[redacted]

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Received
8 - OCT 2014
National Transport Authority

[redacted]

Re. Bus Rapid Transit Swords- City Centre BRT Section

A chara,

Under the Freedom to Access on Information on the Environment Regulations 2007, I seek access to all papers, documents and records held by the National Transport Authority on the allocation of public resources leading up to and the implementation of the decision of the National Transport Authority to proceed with a Bus Rapid Transit Scheme linking Swords/Airport to City Centre, as set out on your Authority's web-site http://www.nationaltransport.ie/bus-rapid-transit/further-information/

The Swords / Airport to City Centre BRT scheme has been identified as the first of the Dublin BRT schemes likely to proceed. It is intended that an application for development consent will be made to An Bord Pleanala later in 2014.

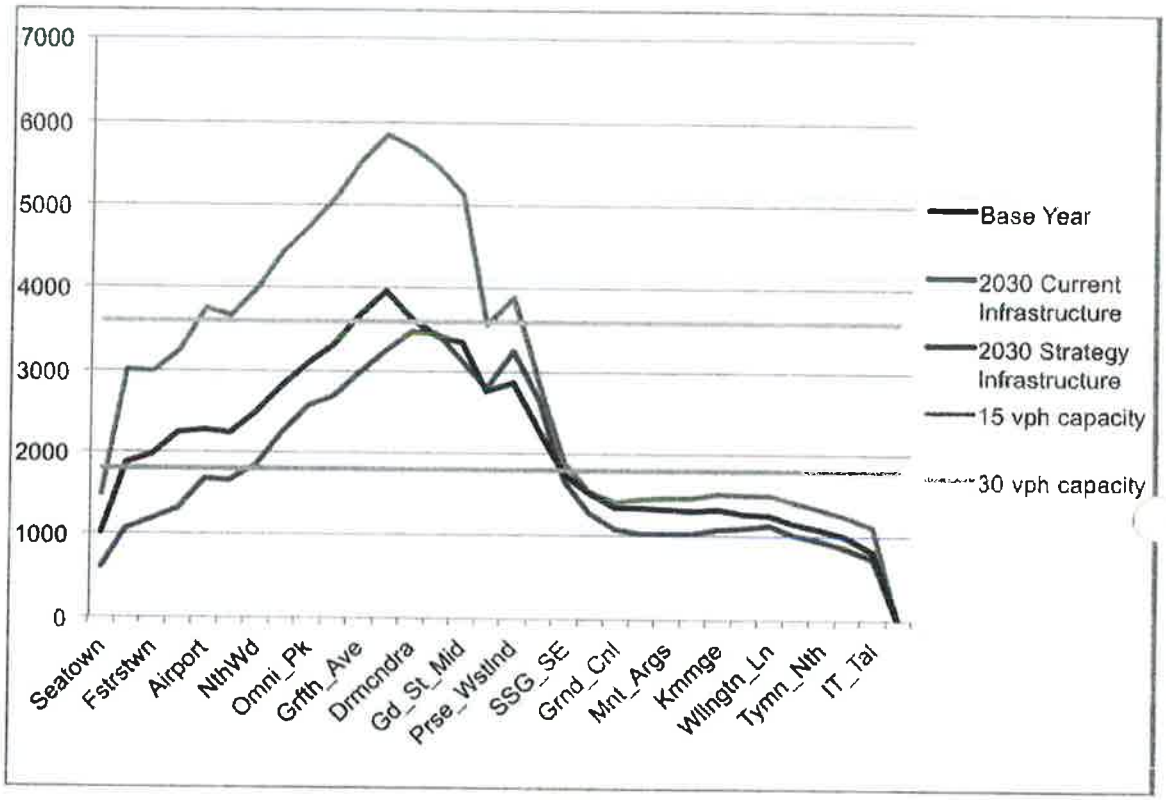
given

the outcome of your Authority's October 2012 Bus Rapid Transit (BRT) Core Dublin Network report (http://www.nationaltransport.ie/projects-schemes/transport-projects/bus-rapid-transit-brt/) which found

1. Inadequate Capacity for the number of passengers identified
   From Figure 37, it can be seen that demand in the Base Year AM peak will likely be strong in this direction, with a peak lineflow of approximately 3,500 passengers at Drumcondra. ***This far exceeds the capacity of a 15vph service and is also very close to the ultimate capacity of 3,600 ppdph.*** *In the absence of Metro North, the 2030 Current Infrastructure scenario shows a peak lineflow of approximately 5,900 at St. Patricks College. This far exceeds the ultimate capacity of 3,600ppdph. The 2030 draft NTA Strategy scenario shows a lower level of demand for the service, which is due primarily to the presence of Metro North in this scenario.* ***In this case the peak lineflow is approximately 4,000, again at St. Patricks College. This also exceeds the ultimate capacity of 3,600ppdph.***

   (NTA: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. p. 49 - my emphasis)

Figure 37 BRT Core Network Study 2012



2. Consequent lack of costing and appraisal

The Swords to Tallaght corridor has a forecast demand that greatly exceeds the capacity of BRT in the current 2030 current infrastructure scenario and also exceed the 3,600 ppdph in the 2030 scenario. It is on the northern section of this corridor – between Swords and the City Centre – that the high levels of demand arise*. The southern section – Tallaght to City Centre – is within BRT capacity. This section of the corridor is common to the Clongriffin to Tallaght proposal which is has been discussed in previous paragraphs. Overall, the link between the city centre and Swords has demand levels that exceed the capacity of a moderate capacity BRT system, in the longer term.* ***While BRT may provide an interim partial transport solution in the shorter term, a higher capacity rail solution, such as a metro, will ultimately be required on this corridor.*** *In light of this, the* ***Swords to City Centre BRT section has not been brought forward*** *to the later costing and appraisal sections of this feasibility study report.....*

(NTA: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. p.72 – my emphasis)

3. The conclusion
   The demand on the Swords to City section greatly exceeds the capacity that can be provided by a BRT system. Based on this level of demand a BRT solution does not cater for the public transport needs of the northern section of this corridor over the longer term. Accordingly, the Swords to City Centre section was not progressed further within this report..... It should be noted that the assumptions used in the demand analysis were for a high quality BRT system, with service and vehicle characteristics similar to the current Luas system. **Any changes to these assumed characteristics would likely result in lower demand on the proposed BRT system.**

   (NTA: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. p.54 – my emphasis)

and

4. Lack of initial consideration of the impact on human beings of noise and air quality arising from the implementation of BRT on any corridor in the section on Environmental Appraisal

   Additionally, environmental topics which were scoped out of the constraint study can be scoped back in as appropriate in subsequent stages of the assessment.
   (NTA: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. p.61-69)

and

5. The misleading information published on your Authority's website
   The report also describes the feasibility study that was carried out on in relation to a proposed core BRT network for Dublin. It identifies a core network comprising of two cross-city BRT corridors: (i) Blanchardstown to UCD; and (ii) Clongriffin to Tallaght. It concludes that the two identified corridors have a significant transport demand commensurate with a BRT system and are appropriate for development as the core BRT network for the city. It also recommends that further detailed planning work should proceed in relation to these corridors.
   Planning and design work in relation to these two corridors is currently on-going.
   (http://www.nationaltransport.ie/projects-schemes/transport-projects/bus-rapid-transit-brt/)

I seek these papers, documents and records in PDF format on a commonly available electronically generated medium.

Is mise

[redacted]

[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

Subject: Proposed Swiftway BRT Swords/Airport to City Centre

I received a leaflet re above in my post today.
I live at Shantalla Drive, Beaumont and it would appear that this new service as presently designed will do nothing to enhance the service from Beaumont to the city. One would think that an improved service ıtering for the inclusion of Beaumont Hospital would be a consideration.
My main concern, however is the reference to the fact that "this will include for some complimentary bus network reorganisation". The last time we had such a reorganisation of services in this area, the service through Beaumont was considerably reduced.
I would like your assurance that services through Beaumont will not be reduced in any way by the introduction of the
new BRT from Swords/Airport to City centre
[redacted]

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0004.

[redacted]

Comments:
So essentially, This is going to take more space away from pedestrians and force them to share what remains with traffic in the form of cyclists?

Traffic and pedestrians should be segregated.

's fairly obvious that pedestrians are only seen as a nuisance in this plan

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0005

[redacted]

I saw in the Metro Herald today (13/10/2014) that you advertise the public consultation for the Swords/ Airport to city centre service. However, I think the consultation should be more widespread as most commuters in the Dublin and even nationally will use the airport service. Therefore, I think that you should not only have the consultation for those living where the proposed the new line will be there. You consider people from throughout Dublin and even the rest of the country will be using the service to the airport at least.

[redacted]

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[redacted]

Hi,

/hat is "Spidersweb" as outlined on the BRT Route and marked in orange? I couldn't find any references to it.

Thank you,
[redacted]

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[redacted]

Comments:
I own a building and operate a business on Hume Street. I am concerned that the proposed traffic changes mean that deliveries will no longer be possible, customers can no longer park on the street, waste will not collectable and our apartment tenant will have no where to park. This will have a major negative impact on the value of the property and the functioning of the business.
I support the initiative in general, but do we have to lose this entire street to normal function? Is Merrion ›w not a more appropriate route and reverse the flow on Kildare street?

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0008

[redacted]

Comments:
Hi,

Is there a drawing BRT-0150_225244-10_P1-63.pdf?

Thank you

[redacted]

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0009.

[redacted]

Comments:
We are 10 years living in knocksedan without a bus route for our children etc could you see if it could come by our estate as it is already serving estates in swords that have a bus route already

[redacted]

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0010

[redacted]

From: Councillor Darragh BUTLER (FF)
Organisation: Fingal County Council
[redacted]

Comments:
BRT Swiftway will not be accepted as a replacement or some sort of consolation prize for Metro North. The people of Swords and North Dublin want Metro North or some sort of light rail system for Dublin Airport, Swords and North County Dublin. It cannot be the case that Luas and light rail is good enough for the south-side but we are expected to make do with bendy buses instead on the north-side. Fuller more detailed submission to follow at a later date.

COUNCILLOR DARRAGH BUTLER (FF)
[redacted]

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0011

[redacted]

Comments:
This is a crazy waste of money.
The use of the words "Swift and "Rapid" to describe this system requires a
A very elastic imagination.
Sincerely
[redacted]

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[redacted]

Comments:
Every counsellor that has called to our door has promised us that theu would do their utmost to provide us with a desperately needed bus sevice. Our estate is now growing with anothet phase being built. Our estate is majority families with young children that are soon to be teenagers going to secondary school and college and a bus service is imperative to our estate. Please take our estate into account when planning the route.

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[redacted]

Comments:
I would like you to consider having a route that would include the Knocksedan estate. We currently have no bus route or access to and at the present time there is construction going on to more than double the size of the estate which would bring it to over 300 households. The average ages would justify the need for a route via Knocksedan. Many thanks if you could consider this as an option for the future..

[redacted]

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[redacted]

I regularly fly home from Germany to Dublin and I am happy to see an improvement in the transport link to the city centre.
In Germany I am part of a team who have developed an electric bus system which is in operation in a ımber of German cities and which may be suitable for this BRT line in Dublin.
Electric buses should be considered for this infrastructure investment in Dublin to bring the Irish capital to the fore in innovation and environmental awareness.
Please check out the link for more details on electric buses.
http://primove.bombardier.com/

[redacted]

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[redacted]

Comments:
This scheme in my opinion is wholly the wrong direction for transport investment in Dublin at this time. The priority for any/all funding at this time should be for the progression of Dart Underground and conversion of the associated Dublin rail network.

Why are we spending another 600 million euros tinkering with bus lanes on roads that are full, while the ıckbone of our future transport system remains in planning deep freeze. We already have express services ıo Dublin Airport and Swords.

Frustrating that the govt are more concerned about "being seen to do something" rather than doing what needs to be done.

[redacted]

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Comments:
knocksedan estate in swords needs transport links.

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[redacted]

[redacted]

[redacted]

Hi

I couldn't submit my comments on the website as it kept coming up with "Validation Errors" after several attempts. Below are my comments:

[redacted]

Organisation:

Please fill the required field.

Address:

[redacted]

Comments:

Could this new service start at Abbeyvale/Swords Manor? There is a huge amount of people that won't be able to avail of this new service because of where the starting point is which seems very unfair. Why not make it more inclusive and change the starting/end point.

Upload your file (.pdf, .doc, .docx and .txt filetypes only. Maximum of 3Mb)

Browse...

J M4 L

Enter the characters above

Send

[redacted]

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0018

[redacted]

Hi

Please find below message for your attention.

Thanks

[redacted]

[redacted]

Time of Call: 15.35

Date of Call: 13/10/2014

[redacted]

Caller would like the terms of reference of the complete works in Dublin.

[redacted]

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This is Service

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Dear Sir/Madam,

You state in your October - November 2014 publication that the Swords/Airport to City Centre corridor is a major transport artery, with several key destinations along the route. Why then would you run a Bus Rapid Transit system on already extremely congested roads? It makes no sense.

Yes the price is better than a light rail or metro system but it does not meet the future needs of the City. Our transport system has to go underground. Millions has already been spent on Metro North planning, CPO's and EIS. Why waste millions more of our tax payers money, doing the same processes for a system which is severely lacking in future proofing our transport needs.

Accept this email as opposition to Swiftway and also reaffirming my support for a Metro project to be built.

[redacted]

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0020

[redacted]

[redacted]

To: Info
Subject: swiftway BRT should Link Fingal

Hello,
I have seen and read your information, but I dont understand why **you think** the city centre is the only way people are going. Currently that is the ONLY choice. For instance - to travel from Howth to you must first travel to the city centre and then travel out again to Clonsilla, this could take up to 4 hours by bus in a raining rush hour.

Why is there no public transport between the large towns on the north side of the county?

Yes the BRT is a good idea, but it falls short, way short, of what north county needs. An imp service once per hour at minimum travelling from howth to sutton, portmarnock, malahide, swords, finglas, blanchardstown, castleknock and on to clonsilla - and maybe - continuing on to town centres that are not in Fingal.

This is needed, expecting people to travel into the city and back out again is short sighted. Maybe people dont need the city centre - but that which is only currently available to them via the city centre. Its as short-sighted as those who agreed to pull up all those Dublin City Tram Lines so many years ago.
Fingal is big now, it has huge enterprise parks dotted all across the county and assuming people can spend hours travelling into and back out from Dublin city is short-sighted and a car-drivers view!

I just want to say I live and work in Swords, and I drive, *so this is not my personal need*, but I see the difficulties of friends and relatives who need and use public transport, or have to taxi to and from work at huge expense.

[redacted]

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0021

RENISHAW (Ireland) Limited

Swords Business Park
Swords Co Dublin Ireland
Telphone: +353 +1 8131111
Facsmile: +353 +1 8131122

NSAI Certified

RENISHAW

Swiftway BRT – Swords / Airport to City Centre Proposed Scheme Consultation
National Transport Authority
Dun Sceine,
Harcourt Lane,
Dublin 2

13/10/14

Dear Sir / Madam,

In relation to "Swiftway BRT – Swords / Airport to City Centre Proposed Scheme Consultation" I note there is no proposed stop at Swords Business Park.

There are a large number of people employed in Swords Business Park with employers such as Noonans, GameStop, Hertz, Abco Kovex.

Renishaw (Ireland) Ltd employs in excess of 180 employees in Swords Business Park.

Could you please consider putting in a stop at Swords Business Park.

Yours faithfully,
Martin Cooney
Finance Director & Co Secretary

Received
17 OCT 2014
National Transport Authority

[redacted]

Comments:
The proposed stop at Airside will not serve Rivervalley. Several Dublin Bus routes and the Swords Express all stop at Airside and none of these services are used by residents of Rivervalley, as Airside is a twenty minute walk from Rivervalley, if not more. Please look into possible stops in Rivervalley as we currently only have one Dublin Bus route to the city centre and this is infrequent and unreliable. The residents desperately need an improved public transport route to the city centre.

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[redacted]

[redacted]

Comments:
1. In general, a system as good as LUAS but cheaper and more flexible is a good idea.
2. It is a pity you appear to be stuck on using diesel. This will appear very short-sighted in ten years' time. Best option would be electric vehicles flash-charged at each stop.
3. Entire system depends on fancy bus-lanes. This will only work if NOBODY drives in it or blocks it. 99% of drivers do not drive in bus lanes, however empty it is and however stuck their lane is. But the 1% cause huge delays, and are rarely penalized. How about having cameras on the buses (including existing normal buses) that record vehicles in the bus lane, that are passed to an automatic fining system, just like speed cameras and toll bridge?
4. I may have comments on the route, but you have made the display at Civic Offices very hard to read, by hanging the maps in the wrong order. So the route is going from left to right on Map 1. Clear enough. Then it continues on the left hand side of Map 2. Fine. But you have hung Map 2 to the left of Map 1. And so on, for all 20 maps. This just makes it painful to work out what you are proposing, and leads to the suspicion that you do not really want us to understand it.

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[redacted]

Comments:
Thank you for your efforts in addressing this important need for a pubic transport artery to/from Swords – Dublin City. Thank you also for consulting the public before proceeding further with plans.

My view on the proposed BRT system is that it is a redundant concept, made so by the existing express bus route from Swords – Dublin city, the Swords Express. This journey takes 20 mins (or 30 mins at peak times) from Swords main street to Tara Street. That is 5-15 minutes faster than projected journey times for the proposed BRT service.

With this in mind, the introduction of an extra bus route simply does not make sense for the large numbers of commuters in Swords, particularly so when it will require additional expensive infrastructure and running costs. The fact that it is 66% cheaper to construct than the proposed light rail system is totally irrelevant if it does not save the commuter time. Please do not waste our money on this.

I implore you to simply bite the bullet and spend the extra time and expense connecting Swords to the red Luas line via Dublin Airport. The considerable additional planning challenges and expense are well worth the investment today in order to create a forward-thinking, connected transport network for years to come.

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[redacted]

Comments:
There is no mention of a bus route to Knocksedan Demesne in Swords we have been waiting on a bus stop outside our estate as we have no safe walkway to a bus stop and now more houses are being build were their will be traffic congestion as no one is able to use public transport! Also if anyone dares walk on the dangerous roads to the nearest bus stop which is so far away their will be an accident soon and I hope it doesn't come to that! Please consider our estate to be on this bus route.

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0026.

[redacted]

[redacted]

Comments:
Can you please extend the new Swiftway bus to include Knocksedan. We are very isolated from rest of Swords and have to continually drop and collect family from bus stop in Swords Manor as it is too dangerous to walk on the back roads. Many thankd

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[redacted]

Comments:
Please can you consider the Knocksedan residents who have no bus stop and no access to a bus stop or or bus service. Thank you.

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Comments:
Just give up on the whole Bus idea and make it into a proper LUAS tram line.

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[redacted]

From: Maura Herrity
Organisation: Beaumont Hospital
Address: Beaumont Road Dublin 9

Comments:
Please find attached document from email mauraherrity@beaumont.ie if you have problems accessint this file please email me directly and I will forward to you.
Kind regards
Maura Herrity
Mobility Manager Beaumont Hospital Dubln 9

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Bosca O.P. 1297 Bóthar Beaumont Baile Átha Cliath 9
BEAUMONT HOSPITAL
P.O Box 1297 Beaumont Road Dublin 9
Guthán: Telephone 8093393 Facs: Facsimile 837 6982
Email: mauraherrity@beaumont.ie

October 2014

Public Consultation on Swords/Airport BRT

Patrons on this route are part of the Beaumont Hospital catchment area and this service would be of benefit to both staff and patients living in this area and coming to the hospital.

Proposal

The NTA would also look at a bus link from the Coolock Lane directly into Beaumont Hospital this would enhance the new service from Swords to the hospital, to walk from Coolock Lane it would take approximately 30 minutes, this would be difficult especially for patients who may be frail or infirmed.

At present there is no direct public transport link from Swords into the hospital, there is a local Fingal County Council NIFTY service. The service links with the 101 from Drogheda transferring at the Pavilions 3 times per day (morning, lunch and afternoon).

These times are not suitable for regular public transport users going to and from work.

There is approximately 3,500 staff 80% of which urrently drive to work due to the lack of public transport into the hospital. 250,000 patients attend the hospital per year.

Survey carried out for Mobility Management Plan Beaumont Hospital

The survey showed the potential for reduced car dependency is highlighted through analysis of travel mode/distance to the hospital. For trips of less than 1km, walking and cycling make up the majority of trips (64%). However, a further 36% (100 employees) are driving to the hospital for this short trip. For trip distances of 1-5km, driving is the most common travel mode with 71% (862 employees) choosing to drive.

Commuting by car to work is predominant with 85.7% of survey respondents driving or being driven to the hospital. Other modes of transport are all used by less than 5% of respondents: walking (4.9%), cycling (3.7%) or public transport (3.8% overall for Dublin Bus / DART / Luas).

Public Transport

The level of awareness of the Public Transport TaxSaver scheme is higher than 70% but the main concern raised by employees through the comments is the lack of quality public transport links to Beaumont Hospital. Indeed, 84% of employee state they do not live within 500m of a direct bus to their workplace.

The lack of direct routes is the main issue some comments from staff:

- "No direct bus route & would take much longer to get here, Bus route into hospital grounds very poor";
- "To take public transport to Beaumont I would need to take 2 buses or Luas and bus and it would take twice as long as using the car".
- "27B could do with running through the hospital at all times, peak hour buses bypass the hospital and in some cases change route to an industrial estate";
- "The sad truth is that there are NO public transport links to the hospital and that in order to travel from Raheny to Beaumont using public transport involves getting 1 bus into the city centre and then a second into the hospital.

- Until there are proper transport links for the hospital, people have little or no other alternative."

Routes from the City Centre, Heuston Station, as well as from Swords and the DART lines, were the main requests.

The number of services to Beaumont Hospital are also rated as poor, as well as connections to other transport modes:

- "You will need to persuade Dublin Bus to provide more buses which come into Beaumont campus";
- "No Luas or Dart and very poor bus routes for those working at 7.30";
- "I used public transport a few days a week for several months last year, when my husband was out of work and we shared a car. Getting home in the evening was a depressing, dispiriting and cold experience, waiting for buses that either never came or arrived late, so that I missed my train."

Overall, the perception of bus services is very poor

- "BH is extremely poorly served by public transport";
- "I would happily use public transport but it's totally impractical".

I would appreciate if you would review a direct link from the new swiftway system to Beaumont Hospital.

Regards

Maura Heerty

Mobility Management Manager
General Services
Beaumont Hospital
Beaumont Road
Dublin 9

0030

[redacted]

Comments:
I have concerns about the routing of northbound BRTs from Merrion Square West into Clare Street and from Lincoln Place into Westland Row. At present buses find negotiating these corners very difficult.

Why not route BRT in both directions along Merrion Street Lower which is a more direct and less difficult route?

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Comments:
Fantastic! Long overdue.

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Comments:
I propose that this route or some route should include stopping at the knocksedan estate. We are now doubling the size of the estate with a the new phase. Buses continue to drive by year after year with no sign of anything ever stopping at our estate. How can the planning authorities give way for more houses in our estate without the provision of some public transport??? Our teenagers are already using 'the forest' to get out of the estate which is unsafe and dangerous! We pay our property tax and deserve some means of public transport.

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[redacted]

Comments:
I would like to have the bus route as far as knocksedan demesne. At the moment it is unacceptable that the teenagers have to go throught a field, Which isn't lite up or no footpath, just a dirt track, to get to the next bus stop. Something has to be done about this for the safety of our children. A bus stop outside the estate is small thing to ask for the safety and independence of all the residence of knocksedan.

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[redacted]

Comments:
Notwithstanding regular efforts on the part of Councillor Butler, Knocksedan is left without any public transport connection. This provides an opportunity to correct that position, especially where further construction work has now commenced on a new phase of the development. The demographic make-up of the Estate is such that there will shortly be a large number of teenage children/young adults left without any public transport.

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[redacted]

Comments:
To whom it may concern,

Looking at the proposals for this scheme, I am both dismayed and disappointed at the lack of forethought and ambition when it comes to providing adequate cycling infrastucture in this city. Having cycled in Copenhagen and Amsterdam, I can only wish for the kind of safe infrastructure that they put in place for their population.

The only way to increase cycling modal share is by getting the infrastructure right and let me be very clear – that does not mean a metre wide strip painted as an afterthought on the side of the road. Only those who have never cycled could possibly propose shared bus/cycle lanes as a good idea. As a vulnerable road user, it is not a pleasant experience to feel a over a tonne of metal whoosh past at high speeds, followed by a faceful of diesel fumes for good measure.

Cycling needs space, that means separate, segregated cycle lanes. You cannot continually give space and headway to cars and other motorized traffic. Not only is it inefficient, it sets a precedent for the livability of the city, which currently, I would not rank Dublin very highly in.

Cycling saves money in the long run both for citizens and government and improves quality of life no end. All of this, without even including the effects of transport on our environment.

I urge you to rethink your planning for cycling and place your priorities with a sustainable form of transport. If you are serious about increasing Dublin's modal share, then infrastructure can only make that possible. I would also think it should be mandatory that those designing, should be made to see their designs in action – that means using them, try cycling in a busy bus lane and I ask if you would put this forward as a reasonable solution.

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0036

[redacted]

Comments:
Re; Santry stops
I strongly believe that the route should be altered to serve the village of Santry and Omni Park shopping centre which is a major destination and employer in the area. The alternative route proposed runs along a comletely segragated road of the N50 serving neither resident nor employees. Surely it is the intention of such a major public project to serve as many members of the public as possible. I would be very interested to see catchment comparisons for these two routes, and indeed will be requesting such as this process continues. The Swords road contains a bus lane along its length thus surely making this a viable option.

[redacted]

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Comments:
This is a dreadful suggestion.

If you intend to do something to improve the flow of commuters and traffic from Swords to Dublin City Centre and back to Swords the answer is to bring METRO NORTH to fruition.

This bendy bus proposal is either an ill thought idea out or willfully trying to mislead the public.

There are excellent bus services providing a quality service to Swords and to the Airport (Dublin Bus, Aircoach and Swords Express).

The only shortfall in transport service in north Dublin is the lack of a quality metro tram from the Airport into Dublin City Centre.

METRO NORTH Project needs to RESTART NOW!

I am sure you have researched the other attempted bendy bus schemes in Europe, and the evidence of their failures. Please be huble and listen to the public – Swords people do not want this bendy bus pretending it is a tram. It is not. It is a bus. And it is no addition to what Dublin Airport and Swords needs NOW –

METRO NORTH.

I hope you listen to ALL the submissions. Not just "key stakeholders".

And LISTEN and INCORPORATE what people SAY in their submissions to you.

[redacted]

[redacted]

Dear Sir,

First of all thanks for considering BRT in Swords- City centre route. The only negative point I noted is the proposed route doesn't cover few major locations in the city.

1) It misses St.James's Hospital and proposed new Children's Hospital
2) It misses Heuston station

I have a proposal to connect both of these points too with the BRT. Instead of planning to and fro routes through the busy Pearse street----St.Stephens Green, plan only One way through it. So return can be through Merrion square-- St.Stephens Green--- Earlsfort terrace--- Kilminham---- St.James's---- Heuston st--- O'Connell St. So that it will connect the busiest city hospitals and Railway station with the Airport and Meets other city transport modes- Dart-Rail-Luas at multiple points.

I have a personal reason for this suggestion too. I am working in St.James's hospital. It will be a great help for people like me who resides in the north of the city.

Wish you all the very best for the project.

[redacted]

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0039.

[redacted]

[redacted]

To whom it may concern,

I am a resident of Swords and I am very disappointed to read the following statement from the National Transport Agency:

"**Bus Rapid Transit (BRT) seeks to emulate the service, performance quality, and amenity characteristics of a modern light rail-based transit system at a reduced cost.**"

A bus system thought it may seek, cannot emulate a light rail system. The BRT is only adding to the already overloaded traffic situation from Swords to Dublin city centre and beyond.

[redacted]

Subject to the disclaimer at http://www.cso.ie/en/emaildisclaimer/

Faoi réir ag an séanadh ag http://www.cso.ie/en/seanadhriomhphoist/

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0040.

[redacted]

[redacted]

Comments:
According to the FAQ section; enforcement along the BRT route will be similar to that in place for existing bus lanes.
Lack of enforcement along bus lanes is one of the main contributors in delays to public transport on existing QBCs.
Take for example the drawing Santry South/Whitehall: currently left turning traffic for Collins Avenue enters this bus lane as far back as where the Shantalla slip road meets the N50 causing long delays to the inbound bus services. According to your drawing and FAQ section it is hoped that this general traffic will no longer queue in the BRT lane. I believe general traffic will continue to queue in the bus lane as Garda enforcement of this bus lane and where left turning traffic blocks other bus lanes is nonexistent.
Widespread use of camera enforcement both on the kerb side and on public transport vehicles is needed across the city in order to keep bus lanes free of general traffic.

I would be very interested in hearing your views on this matter.

[redacted]

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0041

[redacted]

From: Vinny Kearns
Organisation: Xpert Taxis Ltd
Address: C10 The Exchange Calmount Business Park Dublin 12

Comments:
Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre
BRT is suitable for newer cities with longer and wider roads. It will be very difficult to facilitate such long vehicles through our old city streets. There may however be a better use of these buses bringing large numbers to the already existing transport hubs on the outskirts that have a very good service currently allowing these buses return to their starting point avoiding the gridlock and difficult manoeuvres within the city centre. I vaguely remember approx. 12 years ago the trials of "The Bendy Buses "which to my knowledge fared poorly. They had major problems getting around tight corners and I know there were a number of accidents. These type buses on the outskirts and satellite towns could integrate well with the already established nodes enhancing our public transport. Many of our buses and taxis in the city areas are already empty or underutilised.
This city is already slowing down and I worry that we will experience worse congestion than we did during the "Celtic Boom" peaks of 2007. Bring these long buses through the city will create greater chaos.
I have no problems with competition as we now have public and private buses ,Luas, Dart, Hailo, Uber, rickshaws and God knows what other illegal operators to endure. My belief is that once Public Transport is regulated and policed properly that public confidence should encourage more use of all modes of transport.

Regards,

Vinny Kearns C.E.O.

Vinny Kearns
CEO
Xpert Taxis,
C10 The Exchange,
Calmount Park,
Dublin 12
Mob: +353 86 260 4818

0042

[redacted]

Comments:
As a resident of Swords for over 34 years I feel that this Swiftway Bus Rapid Transit will not be beneficial to the community. We have enough buses that go to and from the city. Metro North was a better option! Waste of tax payers money!

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0043

[redacted]

Comments:
This is a waste of tax payers money! We don't need more buses. Traffic on bus corridors is always busy especially at drumcondra! More congestion as you are sharing bus lanes with the like of Dublin bus, Swords Express!!! The community of Swords requires better access links to the city centre! The Luas should have been brought out to the northside!!!!!!!!

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0044.

[redacted]

Comments:
No to Swiftway Bus Rapid Transit! It's a waste of tax payers money yet again! Swords does not need this!
As a daily user of Dublin bus, 41x, the bus corridors are already full and we do not require any further traffic on these bus corridors! How can you promote it as 'Swiftway' when you share bus lanes! Drumcondra is always a bottleneck!!! It's a joke! Metro North / Luas should have been brought out here not some bus!

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0045.

[redacted]

Comments:
Knocksedan requires a bus stop/ route. This has been promised on
Numerous occasions and local election drives.

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0046

[redacted]

Comments:
I welcome this new bus corridor and think it will greatly improve transport times. Where I live on Upper Drumcondra road the paths are in bad condition and an upgrade of the paths would be very welcome.
Cycle paths are also an issue as the previously existing cycle path markings have all worn away. This currently makes it very dangerous to walk on the path especially at night. A designated cycle path would be welcome.
We have a particular problem with cars using a lane to the rear of 49 Upper Drumcondra Road as a short cut. The Lane links Home Farm Road and Wellpark Avenue. The source of the use of the lane is the no left turn at the lights at Home Farm Road and Upper Drumcondra Road. Cars tend to take an illegal left turn there anyway putting pedestrians in danger. During the upgrading of the lights at this junction would it be possible to install a left turn filter from Home Farm Road to Upper Drumcondra road to sync with the pedestrian crossing?

Yours sincerely

[redacted]

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0047

[redacted]

Comments:
To whom it may concern,

As a resident of Swords I am very disappointed to see the plans for the Swiftway Bus Rapid Transit. This will put an end to our hope of getting a light rail connection into the city. We have waited and have been promised for a long time that our town, Swords with a population approaching 50,000 people (bigger than some regional cities in Ireland) would get a light rail system. The light rail system is a tried and tested means of transport that is expensive to build but has lasting benefits. I believe that Swiftway system will be cheaper to build however, as the Fingal area increases in population the Swiftway will lead to more congestion around the Swords area and ultimately fail the people of Swords. Changing the roundabouts on the Swords bypass to signaled junctions feels like a step backwards.
We have waited long enough for the light rail system so if the economic climate is not presently suitable, I would rather wait for another few years to get the light rail system started than have this proposed Swiftway Bus Rapid Transit.

[redacted]

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0048

[redacted]

Comments:
Taxis must be allowed access to the BRT lanes.
Many tourists come in and out of Dublin Airport and while the BRT will facilitate some of them, those laden down with baggage who are not lucky enough to be staying within dragging distance of a BRT stop will continue to use Taxis and will not appreciate being stuck in heavy traffic,
Business users want to be dropped directly to their desired location speedily and in comfort, not in the back of a bus , even if it is quick and near their destination, they too will not be pleased if their Taxi, which usually delivers them quickly to their destination via the bus lane will now be stuck in traffic, this is detrimental to the economic investment the IDA strive to bring in to the City.

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[redacted]

Comments:
I would be very much interested in a route that services DCU and Beaumont Hospital please.
I feel that the proposed routes are generally well serviced by existing Dublin Bus routes already

[redacted]

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[redacted]

Comments:
The proposed route passes in front of my house. We are just before morton stadium. There will be extensive road widening directly outside of my house. I want to ensure that the road & path widening doesn't impact the gross verge and trees outside of my house. The trees provide a lot of privacy and sound dampening.

Also, are there any plans to put any measures in place to slow traffic down on the road between northwood and santry demense?

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[redacted]

From: Robert Keran
Organisation: John Spain Associates
Address: 50 Upper Mount Street, Dublin 2

Comments:
Submission on behalf of J & M Eustace, Highfield Healthcare

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JSA John Spain Associates
Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

50 Upper Mount Street
Dublin 2

Tel 01 662 5803
Fax 01 676 6374
info@johnspainassociates.com
www.johnspainassociates.com

Swiftway BRT - Swords/Airport to City Centre Proposed Scheme Consultation'
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Date: 13th November 2014

Dear Sir / Madam,

RE: SUBMISSION ON BEHALF OF HIGHFIELD HEALTHCARE, SWORDS ROAD, WHITEHALL, DUBLIN 9 IN RESPECT OF THE PROPOSED SWIFTWAY BRT – SWORDS/AIRPORT TO CITY CENTRE

On behalf of our client, [redacted], Highfield Healthcare, Swords Road, Whitehall, Dublin 9, we wish to make a submission on the proposals for the Swiftway BRT – Swords/Airport to City Centre proposed scheme.

Our client has no objection in principle to the proposed Swiftway BRT Swords/Airport to City Centre scheme. The preferred route for the scheme includes Swords Road in Whitehall, directly opposite our client's lands. However, our client is concerned in relation to the potential permanent and temporary landtake that may be required to facilitate the scheme and the impact that this may have upon our client's lands.

The lands at Highfield Healthcare measure approximately 4.03 hectares and are located to the east side of and adjoining the Swords Road, Whitehall, Dublin 9. The lands are roughly rectangular in shape.

The Highfield Healthcare lands are occupied by Highfield Private Hospital, Hampstead Clinic and the Alzheimer's Care Centre. The site also accommodates surface car parking and associated internal distributor roads and is accessed from Swords Road. The location of our client's lands is identified overleaf.

Figure 1: Site Location (site outline approximate only – note that the car parking area to the north-west corner which is under construction in this image has now been completed)
Source: Bing Maps

The road layout at this location currently comprises of a four lane road accommodating a bus lane in each lane, and a footpath on each side of the road. The footpath on the west side of the road incorporates a cycle path.

In order to accommodate the BRT, the following is proposed:

- Two traffic lanes
- Two bus lanes
- Two cycle lanes
- Two footpaths

A comparison of the existing and proposed arrangement is illustrated below on an extract from scheme drawing BRT-0121. The proposals would result in an increased total width at this location of 2.95 metres.

It is understood from initial discussions between Highfield Healthcare and the NTA that permanent landtake from Highfield Healthcare will be a minimum of 2 metres and that a further 2 metres of temporary landtake may be required to facilitate construction.

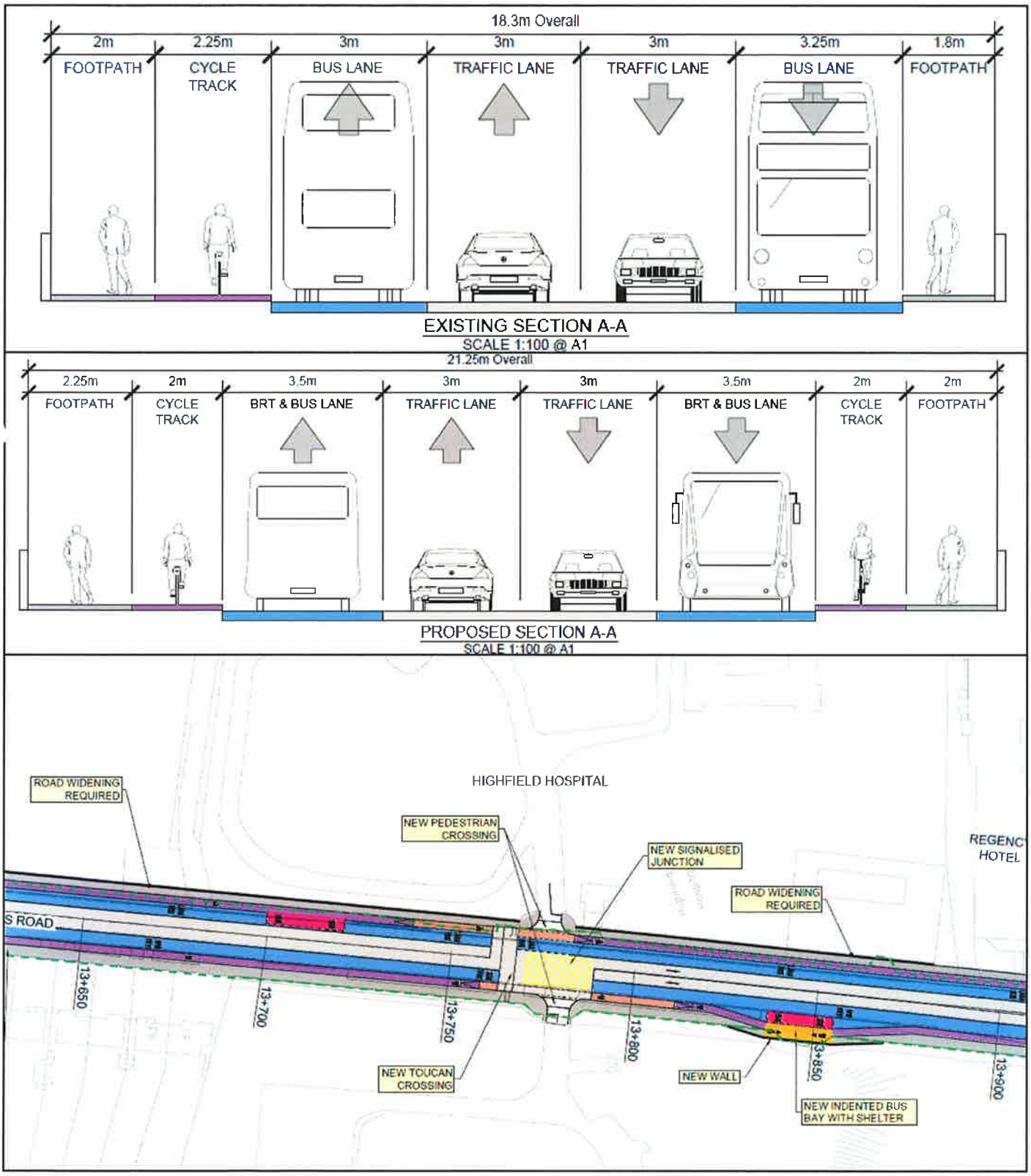

Figure 2: Extracts from scheme Dwg. No. BRT-0121

Drawing No. BRT-0121 indicates that all road widening required will take place on the east side of the road. This will require permanent land-take from our client's lands. Whilst the extent of land-take required is not provided on this drawing or in other available documentation, it is reasonable to assume that up to 2.95 metres of permanent land-take may be required along the full frontage of our client's lands to Swords Road. The extent of temporary landtake that may be required is unclear, but may be 2-3 metres.

There appears to have been no assessment of the impact that this permanent and temporary landtake would have on our client's lands. It is considered that the permanent landtake alone would result in the loss of an important planted boundary at Highfield Healthcare and the loss of up to 14 no. car parking spaces which are located close to the western boundary of our client's lands, to the south-western corner of their lands. 3 no. spaces located further to the north may also be affected.

The planted boundary to the Swords Road is an essential element of the site and provides for the security and privacy of the patients and staff of the hospital. There are no details in relation to the number of trees that would be lost and proposed replacement boundary treatment.

Furthermore, there is a gate lodge built in the early 1700 located immediately to the south of the entrance to the Highfield Healthcare lands, which would be markedly affected by the proposals.

It is apparent that a 3 metre landtake, and even a lesser landtake of circa 2 metres, would have a significant adverse impact.

The permanent landtake that would be required to accommodate the scheme is considered to be excessive and would severely impact upon our client's lands and the operation of the hospital on the lands.

Having regard to the above, it is respectfully submitted that the NTA give consideration to revised proposals which reduce the impact on our client's lands. Such proposals may include the delivery of a cycle path on one side of the road only and / or reduction in widths of the bus, cycle and traffic lanes.

It is further considered that any requirement for temporary compulsory acquisition of our client's lands can be avoided by appropriate traffic management measures during construction which allow the contractor to work from the road, rather than from our client's lands.

It is respectfully requested that these issues be taken into account by the NTA in the evolution of the scheme proposals.

Yours faithfully,

John Spain Associates

0052.

[redacted]

Comments:
Currently only 7 on street parking spaces for 13 properties.These parking places have been allocated due to the fact that we have a dropped foothpath and therefore do not have the option of creating a drive in our front gardens. if these parking places were removed we would have no other alternative unless the Council would cover the cost of raising the footpath to the level of the road.

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[redacted]

Comments:
Hi,
Please find attached letter of Submission regarding the proposed works between Santry South and Whitehall.

[redacted]

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[redacted]

National Transport Authority

14th November 2014

Reference: *Submission in relation to the Proposed Swiftway Bus Rapid Transit Swords/Airport to City Centre – Section: Santry South / Whitehall*

Dear Sir/Madam,
Please find below identified concerns and observations for the development of the Swiftway section from Santry South to Whitehall.

Overall we believe this is a much needed project and support this initiative. However, having experienced the development of the Dublin Port Tunnel in recent years and broken commitments made by Dublin City Council we have a number of concerns. Our concerns are as follows:

1. The junction Collins Avenue/Swords road experiences a large volume of traffic at peak times. We notice it is proposed the current turn lane from ~~Collins Avenue~~ onto the Swords road be removed. Has the impact of this removal been examined? This will cause additional tailbacks on Collins Avenue and cars will use the old Swords road as a rat run to access Santry.
2. Green areas & trees. We notice the removal of green areas and trees from Church car park and along the ~~swords road.~~ We raise concern that trees that have finally started to mature will be removed and not be replaced (like for like) in existing or in close proximity to original site. For example Church car park, residents benefit from the coverage offered by the existing tree line, can this be maintained.
3. Change in swords road between No. 157 and No. 179. We note it is planned to move existing wall and railing into existing green space to facilitate road widening. We are concerned with the loss of green space, the removal of existing trees and the narrowing of existing Swords road. In addition we request assurances that the existing wall and fence will be replace when works are finished and restored in a refurbished state.
4. Swords road from No-197 along to No. 211. Since port tunnel works were completed this road has poor drainage resulting in localised flooding. A promise was made by Dublin City Council to refurbish this section of road on completion of the ~~Port Tunn~~el. This promise was never delivered. Our concern is that works in the vicinity will result in more damage to this road and any fix delivered will add to the patchwork quilt of repairs. We request that this section of road receive a new covering in its entirety to match the quality of works delivered in the area.
5. Finally, as part of the Port Tunnel works the Ellenfield Park boundary wall running from Church to junction of Shantalla road was to be stone clad. This has not materialised and Dublin City Council has reneged on promises made to local residences. In keeping with existing practices in other areas we request as part of the general works that this be included. This is the gateway to the city from Dublin Airport and this finish (as originally proposed), will give an impressive entrance to the city and enhance the planned works.

Yours sincerely,

[redacted]

0054.

Dear Sirs,

I am writing to strongly object to the introduction of this route on the Glen Ellan Road.

I am a resident of Brides Glen and am shocked that you are proposing what you are.

Clearly you have never tried to drive into this estate as the proposal to shorten the drive in is ridiculous as there is literally room for just one car at the moment so basically if you shorten the turn in you would nearly end up in someones driveway upon entering the estate and that alone is just for cars I cannot imagine what will happen when the bin trucks or delivery trucks try to turn in.

Also at busy times due to the local school up the road it is extremely difficult to get out of the estate as people walk their kids or drive them up there, so now on top of this problem we have to try get across 3 lanes of traffic to exit the estate as well which is near to impossible some mornings as it is.

Also you are removing all of the parking for the school further up the road which is going to push all of the traffic into our estate which is going to make it even more difficult as not alone with the new entrance to the estate going to cause a major problem, the traffic will now start in the estate as the mothers will also be looking to exit the estate along with residents of the estate and this will cause some kind of accident for either a child or traffic coming up the road as someone will take a chance and try to get out.

These are just my initial concerns on the car end of things. If my child in a few years time is looking to cross the road to go to the shops she is basically going to try and cross a dual carraigeway which is not safe and the fact you are considering putting childrens lives at risk in order to put these lanes in is a disgrace.

Also children are now expected to walk on much narrower paths which if mounted by a car they will not stand a chance!

As an estate the residents of Brides Glen/Bunbury Gate will strongly oppose these plans and I intend to get on to the Residents of the neighbouring estates as the disruption alone is not worth it.

Also why not improve the service that is there to our side of Swords. Can the current bus service not be improved by quicker bus's to town like the bus for our side of Swords not servicing Rivervalley. On a bad day it can take 40 mins for this bus to tour Swords and finally leave it.

Why not improve that. Why not give us a bus service to connect with the DART in Malahide so people have an option to commute that way. At present the Swords Express is a great bus service to the City Centre which is where I work and alot of people commuting to the City Centre use that already. If you improve the route from our end of Swords with the current 41 bus then your plans to disrupt our whole area will not be necessary and will save everyone money in the long run. The service that is in place is what needs addressing not a whole new system that has no gaurantee's and will never get into town in the proposed 40 mins.

[redacted]

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0055

[redacted]

Dear Sir / Madam

I write on behalf of the [redacted].

We are pleased to see initial plans and discussions in regards the BRT from Beechfield to UCD and we look forward to making a submission on behalf of our residents.

In order to make this submission, we require more information in relation to Beechfield and its role within the BRT. Can further information be provided to us as to how our estate fits in with your plans ? . Is there going to be a bus lane and stops/shelters outside our estate?.These are just some of the points we have, perhaps you can come back to us with further information so we can advise our residents

Look forward to hearing from you

[redacted]

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[redacted]

Dear Sir /Madam,

I refer to my email of March 12th , to date our association has still not received a response from yourselves.

Can we expect a response soon ?

[redacted]

[redacted]

[redacted]

Dear Sir / Madam

I write on behalf of the Beechfield Estate Residents Association (BERA) . Our organisation is mandated to act on behalf of the 373 homes in Beechfield.

We are pleased to see initial plans and discussions in regards the BRT from Beechfield to UCD and we look forward to making a submission on behalf of our residents.

In order to make this submission, we require more information in relation to Beechfield and its role within the BRT. Can further information be provided to us as to how our estate fits in with your plans ? . Is there going to be a bus lane and stops/shelters outside our estate?.These are just some of the points we have; perhaps you can come back to us with further information so we can advise our residents

Look forward to hearing from you

[redacted]

[redacted]

BERA - NOW ON FACEBOOK & TWITTER !

https://www.facebook.com/groups/BeechfieldRA/

http://www.twitter.com/BeechfieldRA

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[redacted]

Dear Sir /Madam

Further to your email below I have resent two emails to yourselves ,one from March and another from September.

I look forward to hearing from you.

Kind regards

[redacted]

https://www.facebook.com/groups/BeechfieldRA/

http://www.twitter.com/BeechfieldRA

On 14 November 2014 16:59, consultation <consultation@nationaltransport.ie> wrote:

Dear Kevin,

Further to your email below, we have reviewed our inbox and it appears we did not receive your original email. It would be greatly appreciated if you could resend the original email to the following addresses:

info@nationaltransport.ie

and

info@swiftway.ie

With thanks.

Kind regards,

The Swiftway BRT Project Team

Dear Sir / Madam

To-date , we have still not received any proper response to our emails. Please do so immediately

Kind regards

https://www.facebook.com/groups/BeechfieldRA/

http://www.twitter.com/BeechfieldRA

2014-09-17 18:56 GMT+01:00 Info <Info@nationaltransport.ie>:

Thank you for your email, it will be reviewed and we will respond to you shortly,

Kind regards,

National Transport Authority

Go raibh maith agat ar do theachtaireacht leictreonach,
beidh freagra d?anta againn agus seolta chugat go luath.

Le dea-ghu?,

An t-?dar?s N?isi?nta Iompair

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T? eolas sa teachtaireacht leictreonach seo a d'fh?adfadh bheith pr?obh?ideach n? faoi r?n agus b'fh?idir go mbeadh ?bhar r?nda n? pribhl?ideach ann. Is le h-aghaidh an duine/na ndaoine n? le h-aghaidh an aon?in at? ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amh?in at? an t-eolas. T? cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an t? a bhfuil an teachtaireacht ceaptha d? b?odh a fhios agat nach gceada?tear nochtadh, c?ipe?il, scaipeadh n? ?s?id an eolais agus/n? an chomhaid seo agus b'fh?idir d'fh?adfadh bheith m?dhleathach.

[redacted]

[redacted]

Comments:
I'm very pleased to see a stop for the RBT at Northwood in this version of the route as it hadn't been included on the earlier version. Having the stop here makes sense for Santry given that it is a large residential area and also a center for employment. regards Louise

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[redacted]

Comments:
Santry South/Whitehall

Concerning the intention to prevent the right turn at the pedestrian crossing into Gaeltacht Park. Access from Dublin North will have to be via the RH turn from swords road to Collins Avenue. This turn is close to capacity most of the time and it will now have a heavier load, the timings on these lights and capacity of the RH turn lane at the lights would have to be increased to accomodate the higher load of traffic, it is almost always backed up into the hatched median at the moment.

The pedestrian crossing at Gaeltacht Park is ignored on Red as a matter of course, I have reviewed it over the years and it is not a simple as red-light runners – I believe the position, orientation of these lights do not register with drivers – this would have to be addressed with the new Toucan crossing.

[redacted]

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0058

[redacted]

Comments:
I object to the closure of the slip lane from Collins avenue to Swords Road for people travelling North.

The works extremely well at the moment and multi use of pedestrians, cyclists and cars operates fine. Closing it off will place a huge burden on traffic volumes on collins avenue if they are completely reliant on traffic light control. Why not place a couple of speed ramps but continue to allow its mixed use.

It is ironic when directly across the road, you are installing what appears to be a filter lane for south bound traffic wanting to turn left on to Collins avenue.

This is important and surely passive filter lanes is an excellent way of moving traffic on its way. It works well, could be tidied up but not eradicated. PLease ensure this plan is amended.

Thank you,

[redacted]

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"DubhLinn"

(Dublin North Business & Cultural Community)

[redacted]

1 North Frederick Street, Dublin 1
T: 086 771 9332 F: 01 872 7674
E: info@cdba.ie www.cdba.ie

10th November 2014

Mr. John Fitzgerald,
Chairperson,
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

Rec...
14 NOV 2014
National Transport Authority

Re: "Swiftway" Bus Rapid Transit – Swords/Dublin Airport to Dublin City Centre.

Dear Mr Fitzgerald,

We believe that this scheme is not cost efficient. In actual fact it's cost on local business will be very high because it will alienate customers and drive them away. It provides NO additional service to them, to the local community or to the Tourism Industry.

Currently there are Private and Public Buses, which can run this route at any frequency demanded. However, unlike most European cities, there is NO rail link from Dublin City Centre to the Airport.

This proposed scheme is contrary to the Government's aim, and the people's aspiration of "growing Tourism substantially"

We would like to highlight our complete opposition an entirely inadequate system, which in reality is only "a tarted up bus lane". We are happy to use the courts, if necessary, to oppose any monumental waste of the State's funds. We are entitled to our constitutional right of equal treatment, as everybody else.

This proposed system is second class and a poor offering to this side of the City and it bears no comparison to that which services the South Side. The priority should be a Rail System using reserved land at Malahide, connecting with the East at Amiens Street and with the West and South at Broadstone. It should be an electric tram with greater capacity than the existing LUAS system, or better still, an enhanced version of the Metro.

Yours faithfully,

Thomas McKeon
Chairperson

"DubhLinn"

(Dublin North Business & Cultural Community)

1 North Frederick Street, Dublin 1
T: 086 771 9332 F: 01 872 7674
E: info@cdba.ie www.cdba.ie

10th November 2014

Mr. John Fitzgerald,
Chairperson,
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

Received
14 NOV 2014
National Transport Authority

Re: "Swiftway" Bus Rapid Transit – Swords/Dublin Airport to Dublin City Centre.

Dear Mr Fitzgerald,

We believe that this scheme is not cost efficient. In actual fact it's cost on local business will be very high because it will alienate customers and drive them away. It provides NO additional service to them, to the local community or to the Tourism Industry.

Currently there are Private and Public Buses, which can run this route at any frequency demanded. However, unlike most European cities, there is NO rail link from Dublin City Centre to the Airport.

This proposed scheme is contrary to the Government's aim, and the people's aspiration of "growing Tourism substantially"

We would like to highlight our complete opposition an entirely inadequate system, which in reality is only "a tarted up bus lane". We are happy to use the courts, if necessary, to oppose any monumental waste of the State's funds. We are entitled to our constitutional right of equal treatment, as everybody else.

This proposed system is second class and a poor offering to this side of the City and it bears no comparison to that which services the South Side. The priority should be a Rail System using reserved land at Malahide, connecting with the East at Amiens Street and with the West and South at Broadstone. It should be an electric tram with greater capacity than the existing LUAS system, or better still, an enhanced version of the Metro.

Yours faithfully,

Thomas McKeon
Chairperson

"DubhLinn" - Dublin North Business & Cultural Community - is a not for profit company limited by guarantee, established in the Republic of Ireland under the Companies Acts 1963-2009. Directors: Thomas McKeon, Jonathan MacCumhaill, Joseph Gavin. Secretary: Ian Ferris. Chairperson: Thomas McKeon. Registered address: 1 North Frederick Street, Dublin 1.

0060

[redacted]

Comments:
Please consider my attached submission re the Proposed BRT corridor from Swords/Dublin Airport to the City Centre.

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[redacted]

National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

[redacted]

Re: Submission Regarding Public Consultation for Proposed BRT Scheme

To whom it may concern,

I wish to lodge some objections/comments regarding the proposed "BRT Dublin Airport/Swords to City Centre" corridor.

I am resident along the route at 176 Upper Drumcondra Road. My main mode of transport is the bicycle, however, I also avail of #16 and #41 buses to the Airport and the #11 bus to the UCD School of Architecture in Clonskeagh.

I have browsed the website and read through the sections of the main report that I can reasonably offer comment on.

The proposed benefits of the scheme are only realisable if the Swiftway service operates along a dedicated corridor. What is proposed is not a dedicated corridor, rather a more congested QBC. Swiftway pretends to operate like a LUAS but this fails to recognise that it is in fact just a bus.

Objections

1) Section 11.7 of the main report details how Swiftway buses might interact with Dublin Buses. The proposal of additional and separate stops along the current QBC, as well as the dwell time for each service behind the other, suggests that extra infrastructure is being created that will offer more disruption than benefits to the current service. Claims of faster and reliable transit times are not a result of the BRT itself but because the Swiftway is servicing fewer stops than a Dublin Bus along the same route.

2) Dublin Buses are constantly overtaking each other at stops. This practice is particularly disruptive to the adjacent car lane and is particularly bad during rush hour. The practice of overtaking is symptomatic of the dwell time of Dublin Buses at stops. A longer articulated Swiftway bus will be unable to overtake a Dublin Buses and is thus, subject to greater dwell times than passengers of Dublin Bus.

3) An 18m long single-storey articulated bus can only provide more passenger capacity than an 11m long double-decker bus if it reduces the number of seats on board thereby increasing standing room. A Swiftway service that travels 15kms from Swords to the River Liffey is asking the very passengers the service is targeted at to stand for an inordinate amount of time. This is not the comfortable journey you are proposing. Public transport allows passengers to read and carry out tasks while commuting. These are not achievable if one is being forced to stand and hold on. Passengers travelling by Swiftway will be as indisposed as if they were behind the wheel of their own cars, this reduces the incentive to travel by public transport. In addition, buses must make ninety degree turns unlike rail services such as the LUAS, these sharp turns are uncomfortable for passengers.

4) The only reason Swiftway can facilitate faster boarding and alighting is because passengers pay before boarding and can access more doors. The same could be true for Dublin Buses if the the driver opened the rear door and if ticketing machines were also provided at stops. Dublin Bus could achieve the same benefits Swiftway is proposing if it wished. This fact makes Swiftway's claims of faster boarding and alighting redundant. The same applies to priority traffic signalling. Indeed, the only reason a Swiftway Bus could be quicker than a Dublin Bus along the same route is because it is servicing fewer stops.

5) The Main Report fails to discuss the biggest Bus Lane users, taxis. The Swiftway will also be forced to dwell behind taxis collecting passengers and dropping passengers off (who must pay first). Taxis can not avail of priority signalling at traffic lights. If a taxi is in the lane ahead of a Swiftway, then the Swiftway is forced to dwell at lights. This reduces the service's reliability considering the inordinate amount of taxis on Dublin streets. Taxis can not reasonably be excluded from servicing the kerb.

6) The proposal does not take into account private coach services that also avail of the existing QBC. These buses cannot avail of priority signalling and sometimes make stops en route, This creates further dwell-times for the Swiftway service.

7) The current QBC from Swords to the city centre is also a main artery for cycle-commuters. As detailed in section 11.6 of the Main Report, cyclists can not reasonably be expected to share a lane with an 18m long articulated bus, nor can they be expected to travel between the bus and the car lane adjacent. The Swiftway proposed is not just reliant on the implementation of the GDA Cycle Network Plan but on cyclists using the network proposed. Uptake of cycle-lane infrastructure is generally poor when it is not thought out from a cyclist's point of view. For example, the provision of a cycle lane along the busy pavement of Upper Drumcondra road into town (per your map) will not be successful. This is a downhill stretch where cyclists will naturally gain momentum and will be travelling at a much greater speed than pedestrians who will take fright. Pedestrians find cyclists a great inconvenience when forced to share the same level of pavement, in addition they tend not to heed cycle lanes marked on pavements causing much disruption to cyclists who must move around them by cycling on the pedestrian side of the pavement. Often it is safer and more convenient for both pedestrians and cyclists if cyclists stick to the road. For the Swiftway to be reliable and safe, the Cycle Network Plan absolutely must be a successful intervention. There is no guarantee of this.

Conclusion
If the BRT is to serve as an upgrade pending the introduction of Metro North or a dedicated light-rail service that will better achieve the results intended, then it is only viable if operating along a dedicated corridor free of Dublin Buses, taxis and cyclists. The removal of one mode of transport from the current QBC will greatly improve the others' operation along it such that there could be no real need for the Swiftway. A more congested QBC with more stops along it to service two bus routes is wholly inefficient and a waste of financial and human resources that should be invested in bringing a dedicated rail corridor closer to reality. Claims of a faster and more reliable service do not stack up as the existing Dublin Bus service along the QBC could easily achieve many of the same gains with less investment.

Suggestions on the proviso a dedicated bus corridor is achievable.

1) Regarding the rationalisation of bus routes servicing the corridor proposed, would it be possible to create a BRT corridor completely free of Dublin Buses? The Swords to City Centre Swiftway replicates the services of Dublin Buses that operate along the existing QBC. This seems an incredibly inefficient way to make something more efficient. The Swiftway would make the #41 bus to the Airport and the #41C to River Valley obsolete. The #1, #16, #33 and #44 buses could be routed from Santry to Beaumont down Collins Avenue (or Grace Park Road and Griffith Avenue) to the QBC on the Malahide Road before reconnecting with their current southbound routes in town. The #11 and #13 buses could run through Glasnevin and Phibsborough before coming down Blessington Street to reconnect with their current route on North Frederick Street. This would improve the reliability of the BRT immensely without disrupting passengers of the existing bus routes as the Swiftway reconnects with all these routes along its proposed route through town. A dedicated BRT would achieve the gains advertised in the Main Report that the proposed mix of QBC and BRT doesn't. The assumption is that passengers will be able to use their existing Swiftway ticket to complete their journey and that there is capacity along the new routes for some extra Dublin Buses. There is no need for multiple buses to run along the Swords/Drumcondra QBC into town. One service using existing/upgraded Dublin Bus stops at frequent intervals makes much more sense.

2) Regarding the Dublin Airport Service, a split service at eight minute intervals must be implemented. As your study concludes, it is not reasonable to expect passengers to connect with another bus on arrival at Dublin Airport Campus to reach the terminal buildings, nor is it reasonable to expect passengers to/from Swords to make the detour to the terminal buildings. A dedicated Swiftway Airport bus in special livery

servicing the terminal buildings reduces confusion for visitors unfamiliar with the airport and city. In addition, a dedicated Airport Swiftway can be better configured to facilitate baggage that a regular Swiftway does not necessarily need to accommodate. Separate services at reliable eight minute intervals will be a significant improvement on existing services for both Swords, Airport and City Centre bound passengers.

I hope my thoughts will be taken into consideration as part of the Public Consultation of the proposed BRT from Swords/DA to the City Centre. Kindly acknowledge receipt of this submission.

[redacted]

[redacted]

Comments:
More buses is a ridiculous proposal. The roads are already overcrowded and likely to get worse. A modern capital city needs a RAIL LINK from its airport to the city centre. The huge successes of the DART and LUAS systems prove that THEY are the systems that work in getting people to use reliable public transport.

I do not support any of the proposed routes and urge that the scheme be scrapped before any more money is wasted on it. Spend money on what is needed and would be preferred y the people – a light rail system!

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[redacted]

Comments:
Thank you for accepting my submission,

When commenting on the provision of Public Transport the NTA, for whatever reason fail to include taxis as playing a part. This was evident when statistics were given at the BRT discussions on 13/11/2014 at Engineers Ireland. I accept that this was not intentional but the NTA failed to acknowledge the role taxis play.
With 11,000 taxis in Dublin averaging 10 jobs per car per day and assuming each trip carried average of 2 passengers then taxis would carry 220,000 passengers a day. This figure is conservative. This in comparison to BRT's projected figures of 30 million annually by 2030 proves that taxis play a crucial role today and could play a better role in the future if integrated properly with all other public transport providers. Despite current economic growth Dublin Bus is only showing 4% growth in passenger numbers and is nowhere near capacity.
The reported growth in traffic movements predict that 50% of traffic movements will be orbital yet the proposed first BRT line is planned from Swords via the Airport and into the city centre. I am not opposed to BRT but would think that these buses could be better used on the outskirts will other modes feeding routes into the city. David van der Spek, Senior Public Transport Expert from Amsterdam stated, "High quality orbital links have proven to be highly successful" In Amsterdam BRT is not the main mode of transport to the city centre. Despite having a track record in operating BRT Amsterdam admitted that punctuality was not satisfactory due to mixed traffic running. Trams remain the backbone of Amsterdam's Public Transport. BRT did not affect Amsterdam's City Centre as the route was orbital. What effect would BRT have on Dublin City traffic and congestion?
BRT is best suited when operated in the median and having exclusivity for this routing with control of traffic lights. As this exclusivity cannot be afforded in Dublin what is the estimated impact on other bus operators and taxis who are all competing for road space and speeds. I would also have concerns regarding taxi access throughout the city especially around Merrion Row and Temple St Hospital.
Josef Mension Dir. Central Services in Barcelona attributed some of the success of BRT to the population density of 1.6 million people per 100 Sq. KM. They average 430 metres between stops which is the polar opposite of our Dublin proposal. Barcelona's taxi and normal bus lanes operate alongside dedicated BRT lanes. Unfortunately Dublin cannot afford this exclusive road space to help BRT operate to maximum efficiency. An average journey in Barcelona is 3KM and passengers are prepared to stand for this short journey. Do you believe that passengers would be willing to stand for a 22KM journey averaging 40 minutes from Swords to the City Centre?

Summing up, there is a place for BRT on Orbital Routes and integrated with all other transport nodes. BRT should not be permitted to reduce road access to other public transport providers which could have an adverse effect on other journey times. If a dedicated BRT lane could be provided then Dublin would benefit best from this additional mode of transport.

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[redacted]

Comments:
Huge problem with the skatepark

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Comments:
Huge problem with the skatepark.

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[redacted]

I have just had the opportunity to examine the plans for the proposed Swiftway.

I wish to lodge a strong objection on behalf of myself and my family. I have three boys who are/will be in attendance at one of the schools adjacent to the proposed bus garage which I feel would affect their current ability to safely walk to and from school. Furthermore the widening of the roads would destroy the current feel of the estates and lead to our being unable to allow our children to safely walk home and play on the greens for fear that they would stray too closely to the new four laned road and putting themselves in danger. This is not to mention the increased car fumes and traffic congestion right around the schools and estates.

I feel that this proposed Swiftway will destroy our current standard of living and a light rail service connecting Swords and the Airport to the City Centre is what is required. We currently have the Swords Express, and putting this money towards yet another bus service and not connecting the main airport to the city by rail would appear to me to be a very rash move and the monies would be better served being saved and ensuring this critical infrastructure is implemented at a later date.

[redacted]

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[redacted]

Comments:
Swiftway is a glorified bus service. By it, the citizens of those areas it is proposed to serve are being sold a pup. After having been promised a metro line, Swiftway represents a huge disappointment to the people of North Inner City Dublin, Drumcondra, Glasnevin and all the other areas linking these areas to the airport. One that no amount of marketing spin, hype and doublespeak can alleviate. While other parts of the city are or will in future be served by rail or light rail links, this part of the city, traditionally disadvantaged, is being further left behind in terms of modern transport infrastructure. It is deeply unjust. I hope the project does not go ahead and the government and the transport authorities have the good sense to invest properly in the Metro line that this City deserves.

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[redacted]

Comments:
I believe no decision has been made if taxis are to be allowed to use BRT lanes?
I think the whole project will be compromised if taxis are allowed to use BRT lanes.
With 11,000 taxis operating in Dublin allowing them to use BRT lanes will cause unacceptable delays. BRT lanes should be for buses only enforced by on street and bus mounted enforcement cameras.

[redacted]

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[redacted]

Comments:
Hi,

I wish to make a submission regaring the BRT proposal regarding the Swords/ Airport to City Centre route. My submission is based on the suitability of BRT for this particular route. My concerns are as follows:

1. BRT shares road space and lanes with other buses and other general traffic at certain parts of the proposed network. This is going to have a significant impact on journey times. If the journey time is not competitive, then people will not continue or resort to using their cars. With economic growth taking hold again, traffic volumes are going to rise regardless of what investment is made in public transport. As long as BRT shares road space with other vehicles, the benefits of this investment will be minimal. As long as journey times remain volatile, which they will in a system that shares road space with other vehicles, the shift in transport modes (to BRT) in this case will be minimal. As LUAS has proved, a reliable system (in terms of journey time etc) shows that people will shift modes if the alternative provides certainty. In my opinion, BRT does not provide this.

2. Rumours of this route costing circa €200 million is a substantial sum of capital investment. While the proposals bring with it public realm improvements at various points of the network, the public realm improvements are restricted to the areas immediate or adjacent to the route.

3. The NTA has openly admitted that Metro North is still rquired in the long run to deal with the expected use and growth in numbers commuting/ travelling on this corridor in the present and future. The NTA admittedly on foot of Government direction is therefore proposing to spend €200 million on a system that will not cater for the long term needs of the corridor. The review by the NTA on transport options for the North Dublin corridor is currently in train and due to issue a report in the first quarter of 2015. My submission in this aspect is that; should the NTA resist pressure to spending this sum of money on this corridor and stick to its own conclusions that Metro North is still required for the long term needs of Dublin and North Dublin. Metro North would provide the "carrot" for sustainable development throughout the entire transport corridor. As a taxpayer, I find it hard to fathom that approx €200 million would be spent on a single project that will not be sufficient for the long term. It is just not acceptable that this sum of capital investment will really only cater for the short to medium term.

[redacted]

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[redacted]

Subject: Objection to proposed Swiftway - BRT

Dear Sirs,

I have just had the opportunity to examine the plans for the proposed Swiftway.

I wish to lodge a strong objection on behalf of myself and my family. I have four children, three of whom are in attendance at Gaelscoil Bhrian Boroimhe, one of the schools adjacent to the proposed bus garage which I feel would affect their current ability to safely walk to and from school. Furthermore the widening of the roads would destroy the current feel of the estates and lead to our being unable to allow our children to safely walk home and play on the greens for fear that they would stray too closely to the new proposed road layout, hence putting themselves in danger. This is not to mention the traffic congestion right around the schools and the neighbouring estates.

I feel that this proposed Swiftway will destroy our current standard of living and a light rail service connecting Swords and the Airport to the City Centre is what is required. We currently have the Swords Express, and putting this money towards yet another bus service and not connecting the main airport to the city by rail would appear to me to be a very rash move and the monies would be better served ensuring this critical infrastructure is implemented at a later date.

[redacted]

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[redacted]

[redacted]

Comments:
The following request was received by Dublin City Council, Traffic Management & Control Section, is being relayed on behalf of [redacted] Please find proposed location for the traffic island in file attached.

Experiencing serious problems entering and exiting Griffith Downs due to inbound traffic not staying in lane and coming in on wrong side of main road.
On 12/7/14 a resident exiting taking a right hand turn got hit by a motorbike coming inbound on wrong side of road.
Another resident coming from city centre and in lane to enter Griffith Downs meets inbound car
head on coming down on wrong side of road.
We would be grateful if an engineer could examine the junction with a view to installing a Bollard or
Island with Illuminated Directional Arrows for inbound traffic to try and make the junction safer
before we have a fatality.

[redacted]

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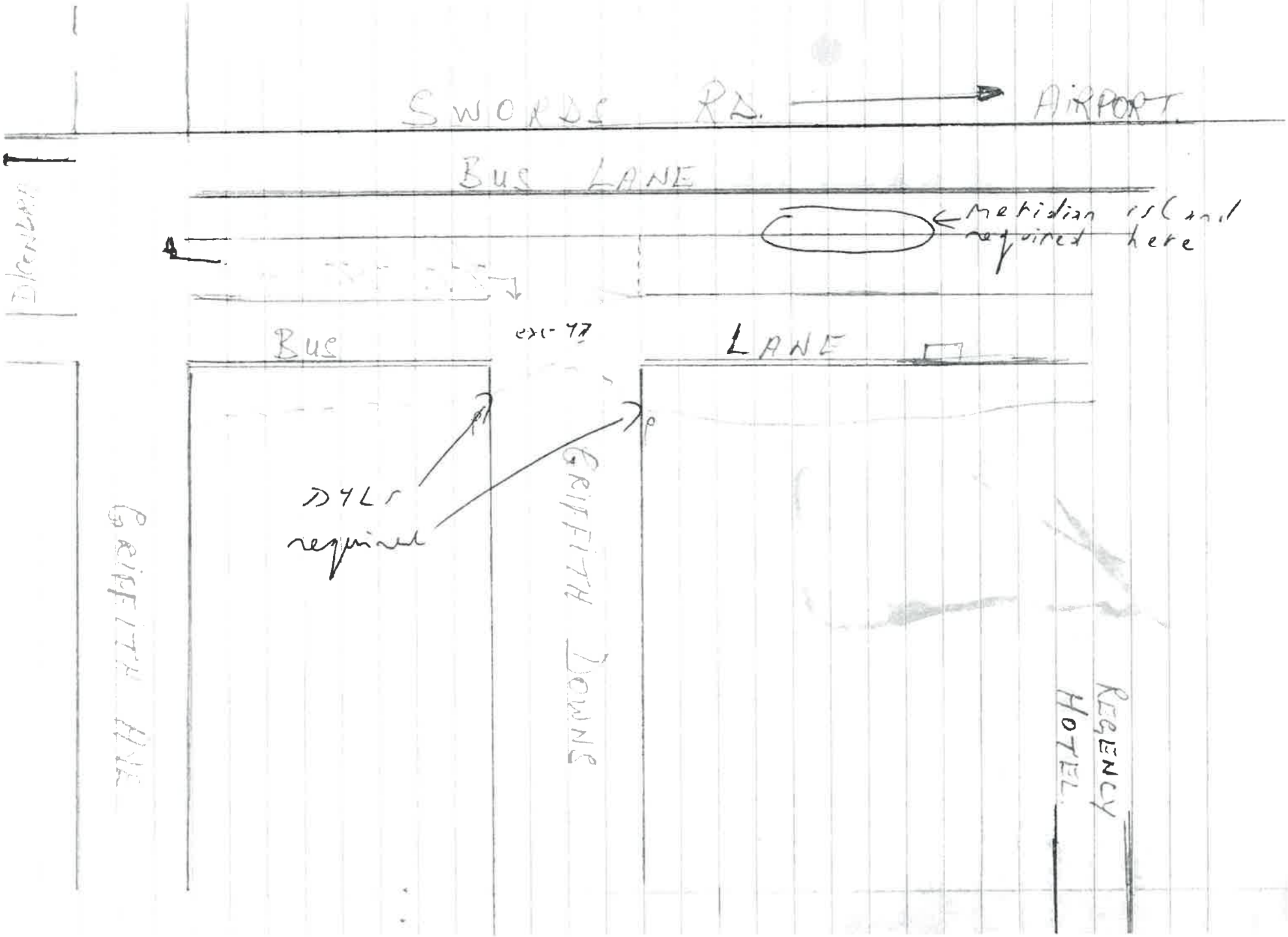
SWORDS RD.
AIRPORT
BUS LANE
Meridian island required here
BUS
LANE
DYLS required
GRIFFITH DOWNS
GRIFFITH AVE
REGENCY HOTEL

0071

[redacted]

Comments:
To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

· The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

· Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

· Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

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[redacted]

Comments:
This looks like an excellent scheme for the city. It is clearly the culmination of a very detailed study, taking due consideration of the needs of Dubliners, and the financial resources available. I have three points/comments to make:

1. The study clearly states that a BRT solution is for the medium term only. The long term plan is still to implement Metro North. Clearly MN is a huge investment for the city. However, at some stage we have to bite the bullet and comit the money. I don't know what the extra cost is, but the benefit would be considerable as we can reasonably expect demand to grow quickly on the route. A max capacity of 1800/hour each way does not sound like a lot of commuters. Having said this, I do think BRT is a reasonable compromise, if funds for MN cannot be found.

2. I think there should be two seperate termini, one in the Airport and one in Swords. I'm not sure if this is already in the plan. The report seems ambiguous as in some places it talks about an Airport terminus, and elsewhere refers to a loop around before going on to Swords. If possible, there should be two stops in the Airport, one at each Terminal.

3. The BRT to the Airport should cater for passengers with luggage, perhaps with fewer seats. You should also consider deliniating it as a seperate route, perhaps making fewer stops so that it could be quicker (an Airport Express). Clearly this will depend on the ability to overtake the Swords BRT although a route throught the port tunnell might be an option.

I just want to reiterate my support. Well done to all involved with this project. Whatever we end up with (BRT or MN) will be a significant addition to the city's infrastructure.

[redacted]

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Comments:

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Points of concern include

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- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

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within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

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I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

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Conclusion

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Upload this file To NTA Website at the following link:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

Closing date for submissions is Friday 28th November at 5pm

0074

[redacted]

Comments:
I live at the above address and wish to make the following comments:

1. At present there is less than 4m between the roots of the trees and my garden wall. This is not adequate to provide a bicycle lane and peestrian footpath. It is at present very dangerous if I exit my gate witrhout due care due to the speed and volume of bikes on the footpath. I have witnessed accidents. In addition cars park on the footpath which further narrows the gap. I would laos like to state that would like welcome the existent trees being removed.

2. I am in favour of the Swiftway Bus Rapid Scheme but would like to know where parking will be provided for drivers who wish to get on a bus in Drumcondra. At present parking spaces on adjoining roads are occupied by drivers parking all day on roads in Drumcondra and getting an existent bus into the city. This will only get worse. As many houses are terraced, this proves extremely inconvenient if you cannot park close to your own house or have visitors. It must be understood that these cars are not all coming from the same direstion as the Swiftway. Many are coming from Ashboune, Finglas, Ballymun etc and there obvious access point to the proposed bus will be Drumcondra.

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[redacted]

Comments:
For the proposed BRT to UCD – instead of terminating at the main entrance – if you extended this through the campus to the Roebuck road side you would make this accessible to Mount Merrion and several major schools e.g. Mount Anvil and the German/International School. There is also a road reservation up through the old Band of Ireland lands that could be utilized with little extra cost/disruption and this would further increase the population that could use this. Indeed you could extend relatively easily up to Dundrum – giving the entire UCD campus access to the Dundrum centre and perhaps the developers would part fund this?

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Removing of Green Space, at Balheary Park
The current proposal requires the removal of existing Green space at Balheary Park which is used by large numbers of individual adults and children and teams from local soccer, Gaelic football, hurling & running clubs.

Removal of Green Spaces along Glen Ellan Road
In addition to the removal of the Green Space at Glen Ellan Park, the current proposal requires the removal of existing Green areas all along the Glen Ellan Road used by local children as play areas at Bunbury Gate, Castle View, Brides Glen, Applewood, Sandford Wood & South Bank.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

• The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

• Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

• Significant issues and concerns relating to the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

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confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

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0078

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0079.

[redacted]

I have just had the opportunity to examine the plans for the proposed Swiftway.

I wish to lodge a strong objection on behalf of myself and my family. I have four girls who are/will be in attendance at one of the schools adjacent to the proposed bus garage which I feel would affect their current ability to safely walk to and from school. Furthermore the widening of the roads would destroy the current feel of the estates and lead to our being unable to allow our children to safely walk home and play on the greens for fear that they would stray too closely to the new four laned road and putting themselves in danger. This is not to mention the increased car fumes and traffic congestion right around the schools and estates.

I feel that this proposed Swiftway will destroy our current standard of living and a light rail service connecting Swords and the Airport to the City Centre is what is required. We currently have the Swords Express, and putting this money towards yet another bus service and not connecting the main airport to the city by rail would appear to me to be a very rash move and the monies would be better served being saved and ensuring this critical infrastructure is implemented at a later date.

Yours

[redacted]

[redacted]

[redacted]

Comments:
The proposed Swiftway is very much to be welcomed.

However, currently there is inadequate road drainage at the major intersection between Swords Road and Collins Avenue West resulting in flooding. The situation has been reported to Dublin City Council on a number of occasions.

The concern locally is that the construction involved in Swiftway could exacerbate this flooding unless the drainage problem is rectified during the construction, including the provision of deep gulleys/shores at a minimum of 9 metres apart.

This major intersection on the road to the Airport carries a high volume of vehicular and pedestrian traffic, including many elderly residents, school pupils and DCU students.

[redacted]

0081

[redacted]

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Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

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Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

• The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

• Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

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Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

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I look forward to the outcome of the consultation process.

[redacted]

0083

[redacted]

Comments:
Attached is my objection to the proposed new rapid bus service (Swiftway Bus)from Applewood Community Centre into the city centre.

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[redacted]

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

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Points of concern include

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Upload this file To NTA Website at the following link:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

[redacted]

Comments:
I absolutely oppose this new bus system for Swords. Call it any name you like – its a bus with a bendy bit in the middle. Whats needed in Swords is a train/metro/underground and I think we all know that if this bus plan goes ahead there will never be Metro North. 240 million for a new bus service. We have two bus services already, no need for a third. I oppose interfering with the skate park and the reduction in Balheary park size. These are much needed amenities in the local area. Also the car parking for the Gaelscoil would be a nightmare. Also, no more footbridges in Swords? And to take this service through Glen Ellen would be a disaster. The fact that you are completely leaving out the Manor, St Cronins, River Valley just goes to show how inept this planning is. Do the right think and give Swords a metro/underground – its not our fault the Government messed up the finances and want to give us a 'bendy bus' instead of the Metro North.

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0036

[redacted]

To whom it may concern:

just a couple of points to consider in relation to the bus rapid transit plan.
We are residents in Clonturk Park and find this proposal quite challenging. However,
1. will the vehicles be using diesel /petrol or be electricity powered? We are very concerned about pollution in the corridor linking the airport to the city centre, adding another set of polluting buses will cause a further strain to the area's air quality.
2. even if more expensive, wouldn't a luas be a better option. In the long term look at how successful it was in the south side?

many thanks

[redacted]

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[redacted]

Comments:
The main glen ellan road and roundabout will be destroyed and the trees will be removed
and we need as much green area as possible.

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[redacted]

Comments:
I attached my objections.

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Impact on Balheary Park

The current proposal will mean that approximately15 metres of the existing park will be removed along the boundary of the Balheary Road up to the Estuary Roundabout to facilitate the widening of the road for the Swiftway Buses. This will result in the green space behind the GAA pitch currently used by Fingallians GAA Club being significantly reduced in length, this will result in footballs and sliotars going onto the new roadway, as the new boundary with the road will be too close to the existing pitch. Also the area that is used by local runners to do their training will be removed. As Balheary Park is used by a number of clubs for both training and matches, the existing parking challenge in this area will be further compounded by the Swiftway proposal.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Impact on Pedestrians

The current plan proposes to re direct the base of the Fingallians pedestrian bridge in to Balheary Park and proposes the removal of all other pedestrian bridges along the route. This will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

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I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

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Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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Closing date for submissions is Friday 28th November at 5pm

0089.

[redacted]

Comments:
Dear Sir,
I object to the National Transport Authority's proposals for a "Swiftway" bus to Swords. I object on the basis that
1. There is no obvious benefit in transport times to Swords
2. It will cause severe traffic disruption along its route
3. Funding for this will come from funds hat could be better utilised

Transport times have been shown in surveys to have no significant improvement over Dublin Bus and will be significantly more than private operator travel times. Overall travel times for the average road user (bus and car) will increase as a result of the reduction in road space for alternative means of transport.

Severe traffic disrupttion will occur all along the route. In particular in school areas like oldtown Swords Educate Together National School the reduction in road space and the elimination of parking will create serious traffic issues and serious safety concerns for school children as a result.

Swiftway will consume significant investment for what can only be a short term solution. This funding would be better spent on true and necessary transport solutions. Swiftway does not provide a solution forr Dublin Airport as walking distance is too far from the Airport. Solutions that do not occupy city streets should take funding instead of this.

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0090

[redacted]

I am emailing as a resident to oppose against this unnecessary bus route that is already available by 41/41c.
This route is going to takeaway green areas that kids play in . Skateboarding park be effected to.

There are areas in swords / kinsealy that dont have bus routes to drumcondra and santry way to town that maybe the money be better invested in

[redacted]

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[redacted]

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C092.

[redacted]

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Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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0093

[redacted]

Comments:
To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

This will cause significant delay to residents trying to access the M1 and M50 to travel to work.

The replacement of the roundabouts with traffic signal controlled junctions will lead to tail backs and make it dangerous, if not impossible for residents of Glen Ellan and Sanford Wood to exist their estate.

The new development at Millers Glen and its planned second phase will add additional traffic volumes to an already congested area and contribute to significant traffic gridlock without free flowing roundabouts.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

• The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

• Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

• Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

The proposed changes to Glen Ellan Road will reduce the safe space available for runners and cyclist to exercise and for families with young children to walk.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

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0094.

[redacted]

Comments:
I strongly oppose this development on the following grounds;
Inadequate effort has been made to inform the residents who will be directly effected by this scheme.
Amenities that are of immense use to same residents are been destroyed without any plan to provide similar.
Our green areas which we, as residents, developed,improved and maintain are been destroyed without any thought or consideration.
Traffic lights on the exit from my road every 4 mins at peak times will negatively impact our lives.
A far more considered improvement would be to develope the exiting bus routes and times.This has been sucessfully proven by Swords Express. A more localised bus service from the various areas in Swords that would be exclusive and more frequent would be a much better proposal and fully supported by residents.
How long is the expected improved journey into city centre?

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[redacted]

Comments:
no necessity for another bus route for this area. The roads are congested enough without Swiftway adding to it. Do not want the boundary to the estate touched. the two stops are too near to the Castleview row.

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0096.

[redacted]

Comments:
I am opposed to this proposal.A feasibility study should be done on the possibility of upgrading the exiting public transport systems. If an area, say Glen Ellan, has it's own dedicated bus route that did not go "sight seeing" around Swords but went directly into City Centre residents and users would be much more supportive.It would cost far less as well. The disruption and inconvenience may seem a fair trade off to some office consultants but will be a hugh burden on residents.Taking land as a trade off may appeal to some, but for us residents, loosing our grass verges,trees,skate park and round a bouts really is beyond fair. There is no proposal to replicaate these amenities.

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C097

[redacted]

Comments:
I am totally against these proposals and I think what you are planning is an absolute disgrace. We bought this house because of the location and the house position and I certainly DO NOT want to be looking at a bus stop.

I am against the boundaries of the estate being changed as I think that it will cause untold problems and has the potential to be very dangerous as the stop is so near to the entrance to the estate. There a lot of families with young children in the estate who like ourselves bought their properties based on the fact the area is so safe for the children to play in. Your proposals are going to increase the amount of cars and pedestrians to the area and the estate where the likes of parking etc is already at a premium.

There is also no need for a FOURTH transport system as we already have Dublin Bus,UR Bus and Swords express which I feel adequately service this and surrounding estates.

I Have looked at the artist impressions and the removal of the roundabout at the end of our road and the creation of a multi lane junction. I think it is preposterious that you plan to do this in an already overly congested area with 5 estates and 3 schools in the area.

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Comments:

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To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Impact on Balheary Park

The current proposal will mean that approximately15 metres of the existing park will be removed along the boundary of the Balheary Road up to the Estuary Roundabout to facilitate the widening of the road for the Swiftway Buses. This will result in the green space behind the GAA pitch currently used by Fingallians GAA Club being significantly reduced in length, this will result in footballs and sliotars going onto the new roadway, as the new boundary with the road will be too close to the existing pitch. Also the area that is used by local runners to do their training will be removed. As Balheary Park is used by a number of clubs for both training and matches, the existing parking challenge in this area will be further compounded by the Swiftway proposal.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Impact on Pedestrians

The current plan proposes to re direct the base of the Fingallians pedestrian bridge in to Balheary Park and proposes the removal of all other pedestrian bridges along the route. This will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

Upload this file To NTA Website at the following link:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

Closing date for submissions is Friday 28th November at 5pm

0099.

[redacted]

Comments:
Community quality of life degraded

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Safety for Children

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Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

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Closing date for submissions is Friday 28th November at 5pm

0100

[redacted]

Comments:
My children use the skate park/basketball park facilities and we would be upset if we lost access to them because of your bus route

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0101

[redacted]

To Whom It May Concern:

I wish to put forward my objections and submissions against the proposed Bus Rapid Transit – "Swiftway" service and the preferred route starting at Oldtown/Castleview. I have the following concerns and objections, in particular affecting myself as a resident of **Bunbury Gate/Brides Glen**:

1. (1) The negative impact on residential amenities.

2. (2) Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre

3. (3) The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service

4. (4) The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin

5. (5) The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express

6. (6) The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre

7. (7) The lack of planning for park and ride facilities

8. (8) Increased noise at night with late buses proposed (and the possibly of unruly behavior with "night-links"

- The removal of walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – unacceptable and will not be allowed by residents

- The removal of existing mature trees and bushes

- The replacement of these walls/railings with a brick/railings not matching current walls

- The moving of the local skateboard park – it took the area long enough to get such a facility and again shows a total lack of consideration for residents and their children

- The increased noise, pollution and risk of accidents along the Glen Ellan corridor road

- The increased pressure on vehicles exiting the estate (at both entrances/exits)

- The lack of planning for signals at these entrances/exits

- The proposed narrowing of the entrances to the estate

- Increased traffic with people from "outside" the area coming to use the service

- Major issues with people using the estate as a car park as there has been NO provision for parking at the new service terminus. This has been viewed as wholeheartedly a major downfall in this proposal and quite frankly insulting to the local residents. People will no doubt use our estate to park their cars in while they get the service into town/to work for the duration of a whole day. This increases the risk of children being hit by vehicles in our estate and makes our estate a less safe place for our children to play

- The fear of pay and display arrangements being introduced to local estates

- The total lack of consideration for parking at the two local schools. This is absurd and shows the absolute lack of consideration for residents, teachers, parents and most importantly school children attending these schools. It is not only ridiculous to remove parking for the two schools but to put our children at risk in such a way is totally unacceptable. On this point ALONE we will be fighting this proposed route.

- An unnecessary and increased risk for children walking to school

- With the average time for journeys being quoted at "40-45 minutes" there really is no time saving for commuters, couple this with having to share an already route with 2 other bus companies!

- No guide has been given as to the cost of journeys

- Increased littering and loitering at proposed bus routes

- Potential decrease in value of property adjacent to a busy bus terminus

On a more personal note I felt the NRA's representation at the local community centre recently was defensive, rude and quite frankly unprofessional. At one point the NRA representative said that in reality "children don't get hit by buses that often". He was unwilling to listen to our concerns – quick to shoot down our concerns and suggestions and dismissive. The whole idea of having such an event is to listen to residents and take on board their concerns. Quite frankly I am shocked and baffled at the total lack of planning or provision with regards to parking near the terminus and local schools.

Thank you for taking the time to read my submission. I would kindly ask that you confirm receipt of same.

[redacted]

I wish to put forward my objections and submissions against the proposed Bus Rapid Transit – "Swiftway" service and the preferred route starting at Oldtown/Castleview. I have the following concerns and objections, in particular affecting myself as a resident of Bunbury Gate/Brides Glen:

1. The negative impact on residential amenities.
2. Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre
3. The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service
4. The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin
5. The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express
6. The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre
7. The lack of planning for park and ride facilities
8. Increased noise at night with late buses proposed (and the possibly of unruly behavior with "night-links")

• The removal of walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – unacceptable and will not be allowed by residents
• The removal of existing mature trees and bushes
• The replacement of these walls/railings with a brick/railings not matching current walls
• The moving of the local skateboard park – it took the area long enough to get such a facility and again shows a total lack of consideration for residents and their children
• The increased noise, pollution and risk of accidents along the Glen Ellan corridor road
• The increased pressure on vehicles exiting the estate (at both entrances/exits)
• The lack of planning for signals at these entrances/exits
• The proposed narrowing of the entrances to the estate
• Increased traffic with people from "outside" the area coming to use the service
• Major issues with people using the estate as a car park as there has been NO provision for parking at the new service terminus. This has been viewed as wholeheartedly a major downfall in this proposal and quite frankly insulting to the local residents. People will no doubt use our estate to park their cars in while they

get the service into town/to work for the duration of a whole day. This increases the risk of children being hit by vehicles in our estate and makes our estate a less safe place for our children to play

• The fear of pay and display arrangements being introduced to local estates

• The total lack of consideration for parking at the two local schools. This is absurd and shows the absolute lack of consideration for residents, teachers, parents and most importantly school children attending these schools. It is not only ridiculous to remove parking for the two schools but to put our children at risk in such a way is totally unacceptable. On this point ALONE we will be fighting this proposed route.

• An unnecessary and increased risk for children walking to school

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Regards

[redacted]

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[redacted]

To Whom It May Concern:

I wish to put forward my objections and submissions against the proposed Bus Rapid Transit – "Swiftway" service and the preferred route starting at Oldtown/Castleview. I have the following concerns and objections, in particular affecting myself as a resident of Bunbury Gate/Brides Glen:

1. The negative impact on residential amenities.
2. Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre
3. The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service
4. The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin
5. The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express
6. The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre
7. The lack of planning for park and ride facilities
8. Increased noise at night with late buses proposed (and the possibly of unruly behavior with "night-links"

• The removal of walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – unacceptable and will not be allowed by residents
• The removal of existing mature trees and bushes
• The replacement of these walls/railings with a brick/railings not matching current walls
• The moving of the local skateboard park – it took the area long enough to get such a facility and again shows a total lack of consideration for residents and their children
• The increased noise, pollution and risk of accidents along the Glen Ellan corridor road
• The increased pressure on vehicles exiting the estate (at both entrances/exits)
• The lack of planning for signals at these entrances/exits

• The proposed narrowing of the entrances to the estate
• Increased traffic with people from "outside" the area coming to use the service
• Major issues with people using the estate as a car park as there has been NO provision for parking at the new service terminus. This has been viewed as wholeheartedly a major downfall in this proposal and quite frankly insulting to the local residents. People will no doubt use our estate to park their cars in while they get the service into town/to work for the duration of a whole day. This increases the risk of children being hit by vehicles in our estate and makes our estate a less safe place for our children to play
• The fear of pay and display arrangements being introduced to local estates
• The total lack of consideration for parking at the two local schools. This is absurd and shows the absolute lack of consideration for residents, teachers, parents and most importantly school children attending these schools. It is not only ridiculous to remove parking for the two schools but to put our children at risk in such a way is totally unacceptable. On this point ALONE we will be fighting this proposed route.
• An unnecessary and increased risk for children walking to school
• With the average time for journeys being quoted at "40-45 minutes" there really is no time saving for commuters, couple this with having to share an already route with 2 other bus companies!
• No guide has been given as to the cost of journeys
• Increased littering and loitering at proposed bus routes
• Potential decrease in value of property adjacent to a busy bus terminus

On a more personal note I felt the NRA's representation at the local community centre recently was defensive, rude and quite frankly unprofessional. Quite frankly I am shocked and baffled at the total lack of planning or provision with regards to parking near the terminus and local schools.

Thank you for taking the time to read my submission. I would kindly ask that you confirm receipt of same.

Regards

[redacted]

[redacted]

To Whom It May Concern:

I wish to put forward my objections and submissions against the proposed Bus Rapid Transit – "Swiftway" service and the preferred route starting at Oldtown/Castleview. I have the following concerns and objections, in particular affecting myself as a resident of Bunbury Gate/Brides Glen:

1. The negative impact on residential amenities.
2. Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre
3. The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service
4. The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin
5. The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express
6. The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre
7. The lack of planning for park and ride facilities
8. Increased noise at night with late buses proposed (and the possibly of unruly behavior with "night-links"

• The removal of walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – unacceptable and will not be allowed by residents
• The removal of existing mature trees and bushes
• The replacement of these walls/railings with a brick/railings not matching current walls
• The moving of the local skateboard park – it took the area long enough to get such a facility and again shows a total lack of consideration for residents and their children
• The increased noise, pollution and risk of accidents along the Glen Ellan corridor road

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Thank you for taking the time to read my submission. I would kindly ask that you confirm receipt of same.

Sent from my iPhone

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[redacted]

[redacted]

24th of November 2014

To whom it may concern,

> As a resident of swords road whitehall, we have concerns relating to the bus rapid transit. We never received your leaflet drop in regard to your Bus rapid transit consultation even though it is in front of our homes.

> We were informed by our councillor . We attended the public consultation which was displayed in the whitehall area. In theses proposals it shows the removal of the railing that are close to our home separating us from the main motorway , you have decided to move it closer to our homes and use our grass verge that is in front of our homes . This is to facilitate space for a pull in area and ticket machine(BTR) etc.. which means also removing established trees.
>
> There is a bus stop just before the Collins ave swords road junction (city centre side) , which is 100 metres away from the bus stop facing our homes.
>
> It would be more suitable as there is already a pull in area and plenty of room for a ticket machine (BTR) etc... This is in front of shops at an existing bus shelter stop. It would not impact on resident in the same way as your proposal in front of our homes. We feel this is a very relevant point and should be addressed. Other concerns are as follows
>
> We would like confirmation that our service road will not be used to direct traffic or used for your work area. This is a narrow slip road which is essential for access to our home
>
> Working times- as we had experiences with the port tunnel we know too well with permission been given for late working hours by the Dublin city council . We would like confirmation of the working hours, as a resident we are entitled to quality sleep . Special licence should be prohibited under ALL circumstances.
>
> Dust levels - with your extensive work closer to the bridge area that will involve large machinery and vibration and dust . We would like to know your plans to address it?
> Any demolition work required in the area will require full consultation including a method statement with residents in line with reasonable health and safety practice.
>
> If you could please address the above issues in full and respond as soon as possible.
>
[redacted]
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>[redacted]
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>
>

[redacted]

[redacted]

To Whom It May Concern:

I wish to put forward my objections and submissions against the proposed Bus Rapid Transit – "Swiftway" service and the preferred route starting at Oldtown/Castleview. I have the following concerns and objections, in particular affecting myself as a resident of Bunbury Gate/Brides Glen:

1. The negative impact on residential amenities.
2. Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre
3. The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service
4. The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin
5. The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express
6. The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre
7. The lack of planning for park and ride facilities
8. Increased noise at night with late buses proposed (and the possibly of unruly behavior with "night-links"

• The removal of walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – unacceptable and will not be allowed by residents
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• The moving of the local skateboard park – it took the area long enough to get such a facility and again shows a total lack of consideration for residents and their children
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• The fear of pay and display arrangements being introduced to local estates

• The total lack of consideration for parking at the two local schools. This is absurd and shows the absolute lack of consideration for residents, teachers, parents and most importantly school children attending these schools. It is not only ridiculous to remove parking for the two schools but to put our children at risk in such a way is totally unacceptable. On this point ALONE we will be fighting this proposed route.

• An unnecessary and increased risk for children walking to school

• With the average time for journeys being quoted at "40-45 minutes" there really is no time saving for commuters, couple this with having to share an already route with 2 other bus companies!

• No guide has been given as to the cost of journeys

• Increased littering and loitering at proposed bus routes

• Potential decrease in value of property adjacent to a busy bus terminus

On a more personal note I felt the NRA's representation at the local community centre recently was defensive, rude and quite frankly unprofessional. At one point the NRA representative said that in reality "children don't get hit by buses that often". He was unwilling to listen to our concerns – quick to shoot down our concerns and suggestions and dismissive. The whole idea of having such an event is to listen to residents and take on board their concerns. Quite frankly I am shocked and baffled at the total lack of planning or provision with regards to parking near the terminus and local schools.

Thank you for taking the time to read my submission. I would kindly ask that you confirm receipt of same.

[redacted]

[redacted]

Comments:
No to another bus transport. No to to tsking away green area, skatepark and so on.

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[redacted]

Comments:
Hi,

I would lie to drop some comments based on the information and understanding that I have at the moment. It seems like Swords Express is already serving for those people that commute to town with a much more convenient and direct route and an excellent service. For those that for example study at dcu, it looks like the route will be very similar to existing 41/41c route. Therefore, there is no justification for investment of tax payers money.

This type of investment would only be justifiable for metro/luas/train commute and does not make sense to create another bus route (that will not even go via Boroimhe for example).

Hope these comments will be taken into consideration

Regards,
Anna

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Comments:
I do not see the need for another bus route from swords to town there is plenty of them already what we actually need is a proper train (Metro) service. one that could connect Dublin Airport to the city center also like almost all other European Cites. The swift way is another half baked idea which will be cheaper than a train service to set up but will probably cost more in the long run and also will not stand to any one in the future , to really help develop the area properly and one that will stand the test of time a train/metro is required.....

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Comments:
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'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

[redacted]

Don té lena mbaineann sé

Is mian liom/linn ábhair bhuartha a ardú maidir leis an mbealach atá beartaithe don scéim nua bus sciopaidh idir Sord/Aerfort agus Lár na Cathrach.

Tá mo pháiste/í/ ár bpáiste/í ag freastail ar Ghaelscoil Bhrian Bóroimhe atá ar an mbealach atá beartaithe don scéim Nua.

Tá mé/muid buartha faoi na nithe seo a leanas:

1. Is gá do thuismitheoirí áirithe a bpáistí a thiomáint ar scoil. Má leanann an sceim ar aghaidh mar atá beartaithe, ní bheidh aon pháirceáil idir an stop ag Coill na nÚll agus an stop ag Seanbhaile. Cruthóidh sé seo neart fadhbanna do thuismitheoirí a bheidh ag iarraidh a bpáistí a thiomáint ar scoil in am agus bainfidh sé an rogha sin uathu.

2. Beidh brú ar thuismitheoirí a gcaranna a pháirceáil sna heastáit ata cóngarach don scoil (Geata Bhunbaire, Radharc an Chaisleáin agus Gleann an Mhuilleora) agus cuirfidh sé sin brú ar na heastáit chéanna

3. Caithfear bheith airdeallach ar shábháilteacht na gcoisithe agus an bealach nua á dhearadh. Níl ach dhá thrasnú beartaithe taobh na scoile agus is gá go mbeadh níos mó ann chun cur le sábháilteacht na bpáistí a shiúlann ar scoil.

4. Beidh níos mó trácht ar an mbóthar, go háirithe ar maidin agus tuismitheoirí ag iarraidh a bpáistí a sheoladh ar scoil agus cruthóidh an trácht bhreise seo contúirt sa bhreis do leanaí.

I/We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

My/Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

I/We have a number of concerns regarding this route:

1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

Is féidir an litir a úslódáil ag an nasc seo a leanas/*Upload this file to NTA Website at the following link*:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

An dáta is deireannaí i gcomhair aighneactaí ná 28-11-14/*Closing date for submissions is Friday 28th November at 5pm*

[redacted]

Comments:
I object to the proposed Swiftway from Swords / Dublin to Dublin City on a number of grounds.

Firstly, I think that a private company, Swords Express, are already providing an excellent express service to Dublin City. The proposed Swift-way would not offer an improvement on the existing services at massive cost to the taxpayer.

Secondly, Dublin Airport has had its best year in terms of passengers numbers since 2008 and is foretasted to increase in the future. Swords and the greater Fingal area has been identified as area that will have large population growth over the next few years as more and more housing developments come on stream. The people of Fingal and Dublin Airport deserve a world class transport link to the City Centre whether it be Metro North, Luas or Dart extension, it needs to rail based solution that in 10,20,30 years time, will form a major part of the transport infrastructure for Dublin Airport and City.

Thirdly, The N.T.A. and Government have both said that a light rail is the medium / long solution for Dublin Airport / Swords. They have said that the proposed Swift-way is an interim solution. I can't believe that the government would propose to spend hundreds of million euros of Tax payers money on an interim solution. In my opinion, the proposal is short sighed. It's a waste of tax payers money. If this is really a "interim solution", they should invest in Dublin bus to run the proposed route at a fraction of cost of this proposal as interim solution. The state needs to invest in a light rail solution in the long term and this proposal would delay or indefinitely postpone future investment in a light rail solution.

Also, as a citizen who commutes into Dublin City on a daily basis, I see Dublin city traffic at peak times in the morning and the evening. Dublin city does not need more buses that would push it to tipping point. The proposed route via Drumcondra and Dorest street area has been a traffic disaster for a number of years. This area does not need more traffic on its streets, it need less. An alternative rail solution could massively reduce the traffic on the streets and travel times that would improve the quality of life for the commuters and residents.

The new Swift-way style bendy buses were introduced to Dublin city by Dublin buses at the start of the last decade. They have been phased as they were not suited to the narrow streets of Dublin City. This proposal would introduce more bendy buses that have already been proved not suitable for Dublin City.

When the powers of be, decide whether this proposal goes ahead, they should consider the long term implications of the plan. Dublin city and greater Dublin area's population will continue to grow and grow over the next number of years. Dublin City, Dublin Airport and Ireland need a world class transport link from the airport to the city centre. Dublin remains one of the only capital cities in Europe that does not have a rail link from its airport to the city centre. If you look back at the infrastructure projects such as the Dart and the more recently the Luas, what would Dublin traffic levels be like without these vital infrastructure projects? Ireland needs to invest in a light rail solution so the generations that come after us can be proud of their capital city's infrastructure and proud of the choices we make today.

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Comments:
Please see file attached

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'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

[redacted]

We have a number of concerns regarding this route:

1. It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

[redacted]

Comments:
I would like to raise my concerns over the plans for the Swiftway Bus Rapid Transit – Swords/Airport to City Centre.

The concerns and my objections are to:
the removal of the skate park on Balheary Road;
the removal of the only parking area for the Swords Educate Together National School;
the removal of the grass verges and trees on Glen Ellan Road;
the closure of Jugback Lane;

All of the changes above combined do not positively affect the local area. The proposed changes will only serve to increase traffic congestion in the already busy area, with reduced facilities for the local community.

I object to the proposed plan for the Swiftway Rapid Bus Transit.

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Comments:
Santry North Stop

Main Concerns:

1. We note the proposal to remove part of the green and footpath at Santry North. We request that you should retain as much of the green area as possible. Your plan shows tree planting on the remaining green area. We trust the result will be aesthetically pleasing.

2. Parking
Management of car parking standards is of concern. At present car parking is haphazard and uncontrolled, and this causes enormous problems to the residents of this estate.

3. We would like to ensure that the yellow box at the traffic lights onto Coolock Lane remains in place.

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Comments:
I personally object to this transport proposal as it is obviously an attempt to deflect and delay the provision of a top quality transport system to the people of Swords as should be provided by Metro North simply for a short temm saving. The proposed erosion of current public amenities is frankly disgraceful and I fear that the net effect will be to increase traffic and gridlock in and around the greater Swords area as a result of this proposed scheme. I feel that my submission along with those submitted by others in the area accurately conveys the feelings of the majority of Swords residents towards this proposed scheme that is quite frankly unwanted.

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To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Impact on Balheary Park

The current proposal will mean that approximately15 metres of the existing park will be removed along the boundary of the Balheary Road up to the Estuary Roundabout to facilitate the widening of the road for the Swiftway Buses. This will result in the green space behind the GAA pitch currently used by Fingallians GAA Club being significantly reduced in length, this will result in footballs and sliotars going onto the new roadway, as the new boundary with the road will be too close to the existing pitch. Also the area that is used by local runners to do their training will be removed. As Balheary Park is used by a number of clubs for both training and matches, the existing parking challenge in this area will be further compounded by the Swiftway proposal.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Impact on Pedestrians

The current plan proposes to re direct the base of the Fingallians pedestrian bridge in to Balheary Park and proposes the removal of all other pedestrian bridges along the route. This will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without the provision of a large scale and free park and ride facility being provided and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need vastly improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North.

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

Upload this file To NTA Website at the following link:

http:/ www.nationaltransport.ie consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

Closing date for submissions is Friday 28th November at 5pm

[redacted]

Comments:
As a home owner in Applewood Swords and parent of child attending applewood educate together I wish to oppose the route location outside the school entirely, I do not believe the use of that road, as a route and terminus is necessary and I strongly disagree with this plan. I wish to oppose also the removal of the parking spaces outside the applewood educate together school, as used by the parents. Existing land should be sought elsewhere, mind you I feel the bus route is not necessary the Swords Express does a fine job.

Thank you.

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Comments:
Please find attached my letter of objection.

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To whom it may concern,

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

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The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

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The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.
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I look forward to the outcome of the consultation process.

[redacted]

Comments:
I strongly disagree with the proposed swiftway, i DO NOT want the skate board park to be removed as it is a vital recreational use for the youth of swords. We need a metro not more buses ????????? what is your thinking behind this, more waste of money and bad thought process

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I had a visit from one of your representatives T Mallon on about 6th Oct 2014.

He explained the reason for his visit and possible consequences for my family.

I want to take this opportunity to totally reject any proposal to take any portion of my garden for this project. I will not agree under any circumstances to allowing any portion of my garden to be used for your proposed project.

I will try to attend one of the information sessions which one I don't know as yet.

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I look forward to the outcome of the consultation process.

[redacted]

[redacted]

Comments:
Hi
I would like to raise my concerns regarding this proposed public transport.
I am resident in Swords and I don't believe that we need a new service. I work in the city centre on a regular basis and use the private coach "Swords Express". This is a fantastic service, it runs regularly and has additional buses at peak times. Also it serves the local housing estates a lot better than the new proposed service.
The new service is very expensive and will cause disruption for a long period.

[redacted]

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IMPACT ON TRAFFIC
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- The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour
- Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding their quality of life.

SAFETY CONCERNS
- There are significant issues and concerns relating to the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT. The removal of footbridges along the route will most certainly lead to accidents and possibly fatalities.

DETERIORATION OF EXISTING SERVICES
- While I agree the Dublin North County deserves a superiour public transport system, BRT cannot substitute or replace the promised Metro North. Installation of the BRT service will no doubt impede the development of Metro North. Furthermore, traffic signal priority to the BRT will have a negative impact on other road users and can only lead to the deterioration of other bus services operating in the area. The existing (private) Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

[redacted]

Comments:
To Whom It May Concern:

We wish to put forward my objections and submissions against the proposed Bus Rapid Transit – "Swiftway" service and the preferred route starting at Oldtown/Castleview. We have the following concerns and objections as residents of Bunbury Gate/Brides Glen:

1. The negative impact on residential amenities.
2. Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre
3. The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service
4. The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin
5. The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express
6. The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre
7. The lack of planning for park and ride facilities
8. Increased noise at night with late buses proposed (and the possibly of unruly behavior with "night-links"

• The removal of walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – unacceptable and will not be allowed by residents
• The removal of existing mature trees and bushes
• The replacement of these walls/railings with a brick/railings not matching current walls
• The moving of the local skateboard park – it took the area long enough to get such a facility and again shows a total lack of consideration for residents and their children

• The increased noise, pollution and risk of accidents along the Glen Ellan corridor road
• The increased pressure on vehicles exiting the estate (at both entrances/exits)
• The lack of planning for signals at these entrances/exits
• The proposed narrowing of the entrances to the estate
• Increased traffic with people from "outside" the area coming to use the service
• Major issues with people using the estate as a car park as there has been NO provision for parking at the new service terminus. This has been viewed as wholeheartedly a major downfall in this proposal and quite frankly insulting to the local residents. People will no doubt use our estate to park their cars in while they get the service into town/to work for the duration of a whole day. This increases the risk of children being hit by vehicles in our estate and makes our estate a less safe place for our children to play
• The fear of pay and display arrangements being introduced to local estates
• The total lack of consideration for parking at the two local schools. This is absurd and shows the absolute lack of consideration for residents, teachers, parents and most importantly school children attending these schools. It is not only ridiculous to remove parking for the two schools but to put our children at risk in such a way is totally unacceptable. On this point ALONE we will be fighting this proposed route.
• An unnecessary and increased risk for children walking to school
• With the average time for journeys being quoted at "40-45 minutes" there really is no time saving for commuters, couple this with having to share an already route with 2 other bus companies!
• No guide has been given as to the cost of journeys
• Increased littering and loitering at proposed bus routes
• Potential decrease in value of property adjacent to a busy bus terminus

We feel the NRA's representation at the local community centre recently was defensive, rude and quite frankly unprofessional. At one point the NRA representative said that in reality "children don't get hit by buses that often". He was unwilling to listen to our concerns – quick to shoot down our concerns and suggestions and dismissive. The whole idea of having such an event is to listen to residents and take on board their concerns. We are shocked and baffled at the total lack of planning or provision with regards to parking near the terminus and local schools.

Thank you for taking the time to read my submission. I would kindly ask that you confirm receipt of same.

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[redacted]

Comments:
I am completely against this. Why do we need a duplication of the bus service being provided by Swords Express? Why should we allow this duplication to remove the skatepark that is heavily used by the youth of the area?

How about we look at alternatives such as a train service (which the rest of the north county has access to) or a metro line to the airport and the city?

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I look forward to the outcome of the consultation process.

[redacted]

BRT Consultation,
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2

Re: Swiftway consultation process - Concerns

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Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

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Comments:
To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.
Points of concern include:

• The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

• Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

• Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

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[redacted]

BRT Consultation,
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2

Re: Swiftway consultation process - Concerns

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[redacted]

SUBMISSION ON SWORDS BRT CONSULTATION - NOVEMBER 2014

Summary:

An analysis of the detailed route design shows that great effort has been made to give a clear uninterrupted route for the BRT. This involves road widening in many places and use of layby bus stops for other buses so that they do not impede progress of BRT vehicles. In most locations care has been taken to ensure that left turning traffic does not block the path of the BRT vehicles. However, there are a number of significant issues to be discussed, including BRT priority compared to Luas, and types of vehicles to be used.

- Good route from Swords to city centre. More work needed on some junctions and bus stops. Some of city centre plans are not ideal and could cause delay and unreliability of BRT, as well as insufficient space for other buses.
- Overall northbound route and stops for Luas, BRT and other bus in Westmoreland St. and O'Connell St. needs to be reviewed. All public transport needs to be considered together, with priority based on expected passenger traffic, even if this means revising the Luas plan.
- Plan needs to take account of impact on other bus routes to ensure that service and stop locations for other parts of the city (e.g. Finglas, Ballymun, also southside) are not sacrificed.
- There is no discussion on vehicle type. This needs to be debated and pros and cons of each type outlined. Artic single deckers with high standee capacity not suitable for long journeys such as Swords.
- The plan needs to focus not only on construction, but also on how a quality service will be delivered. This will include traffic management and culture, as well as operator contracts and performance.

Selection of vehicle type:

The document reads as if articulated single deck buses are the only bus suitable for this service, without any analysis or justification for this. There are a number of factors to be taken into account, and an informed discussion is required.

Articulated single deckers with multiple doors would be closest to the Luas product, and this clearly works well for Luas. It is an "honour" fares system, rather than having to show tickets to a driver or conductor. It is the customers rather than driver who decide when the vehicle is full, based on crush capacity. It is ideal for fast boarding and alighting, and very valuable where both are happening in significant numbers at the one stop. Artics are also the most common bus types on BRT systems in Continental Europe and elsewhere.

Swords BRT is catering for essentially a commuter market. The demand analysis shows that most boardings inbound in the morning are in Swords, so with capacity planned to match peak demand, the buses will be very full out of Swords. Similarly, outbound morning peak buses to Airport are full most of the way, with alighting being

in Airport. The demand analysis boarding and alighting at intermediate points is surprisingly low.

An analysis of Figure 10.6, peak hour demand in the morning to city suggests that, with 15 buses per hour, the average load per bus will be 100. But it also suggests that average load out of Swords will be 80. Expected seating capacity is of the order of 50, so that implies 30 (or 37%) of peak passengers boarding at Swords would be standing. It is likely that passengers boarding at Swords North would have to stand. A similar situation in reverse would apply in the evening peak.

The other factor to consider is the turnover of passengers. The advantage of multiple doors and single deck is in dwell time reduction when there are a lot of people alighting and boarding at the same time. The expected average boarding and alighting per bus at the most significant stops are shown below. These are derived from Figure 10.6:

	on	off
Santry north	10	12
Santry South	8	2
Collins Ave.	13	8
St. Patrick's College	12	6
Drumcondra	13	10

These are not very significant figures, and this suggests that the benefit of single deck artic buses would be quite small on this route.

A similar analysis on a route such as, for example, Whitehall to Terenure, might give a different answer, as

- the numbers boarding and alighting at each stop would be greater
- the average passenger journey would be shorter.

Such a route would be more like most of the systems abroad which use artics.

There is a strong customer resistance to standing. Tolerance of standing is higher when journey is short, or when the time saved is so great that standing is still better than the alternatives. There is also a higher acceptance of standing for longer distances on rail modes, due to higher comfort level. Articulated buses in particular have a poor ride quality in the rear section as there is only one axle, and standing here for long periods would be particularly uncomfortable. The tolerable standing time on a BRT is probably about 15 to 20 mins, no more.

A previous effort called "CitySwift" on the Blanchardstown route in 1993 failed on precisely this point. The concept was high capacity standee single deckers, with high frequency service. But customers were refusing to get on buses with no seating available, opting instead to wait for the next bus. These buses were replaced by double deckers within three years.

"Bendi-buses" were introduced in London in large quantities in the middle of the last decade. They were all withdrawn within a few years and, in fact, they became a high profile political issue in the London Mayor elections. There are very few articulated

buses now in use in UK. These buses are more successful in Continental European cities that have two characteristics:
- higher population density, so journey distances are short. For example, at the recent BRT Conference (CILT/IEI) the Barcelona speaker stated that average BRT journey length was 3 km.
- almost universal use of period tickets, so there is no marginal cost of an additional journey, and therefore people are more inclined to use buses for very short journeys.

It would be a serious error to assume that articulated single deckers are the most appropriate for a long route like Swords without detailed analysis and an opportunity for commentary. Analysis should include:
- average passenger journey length (the shorter the more suitable "bendis" are: for longer a high seat ratio is needed)
- turnover of passengers per journey (ratio all boardings to peak load)
- typical boarding and alighting at busy stops (these look low at most intermediate points)
- boarding and alighting times for various forms of bus (single deck, double deck, number of doors, one or two staircases)
- seating/total capacity ratio and what it means in practice for percentage of passengers standing, and for length of journey standing.

Also to be taken into account is what people are used to. If used to getting a seat on a 41, a 41x or Swords Express, am I going to switch to BRT and stand?

Among the options would be the Wright's London style "New Routemaster", a double decker with multiple doors and stairs. This combines the benefit of high seating ratio with faster boarding and alighting using an "honour" system. A double decker would also take up less space at stops and at layover termini, with some practical benefit. It would need more vehicles per hour at peak to carry the expected demand.

The ideal vehicle would have 80 seats, multiple boarding and room for about 40 standees as well.

If articulated buses are used as planned, then the outcome will be one of the following:

1. demand will not reach expected levels, as boardings in Swords will be much lower due standing not being acceptable
2. more vehicles will be required to and from Swords at peak
3. demand from Swords will be less than expected, but offset by higher demand in Santry/Whitehall/Drumcondra.

The main point is that NTA is stating that type of bus has been decided, and no justification or analytical details has been provided to back up that decision. We need an analysis and debate on this issue to determine the optimum vehicle for this particular market.

Route and traffic management

There are a number of comments on the route and its ability to provide an uninterrupted path to the same level as that of Luas:

1. central median is used on Swords bypass, but lateral lanes for the rest of the route. It is a pity that central lanes are not used more. There are a multiple of reasons why lateral lanes are at risk of being blocked by other traffic, which would not arise with central lanes. It will be an operational challenge to get a culture and enforcement to ensure that BRT gets the same respect as Luas for not having its passage blocked either by deliveries, taxis loading or left turning traffic. It would be easier to overcome these with central BRT lanes.
2. there are a number of locations between city centre and Whitehall in both directions where regular bus stops seem to block BRT. Clarity is needed on how this will be managed.
3. there is significant sharing of road space with general traffic between North Frederick St. and southside terminus. Some of these are likely to cause significant delay to BRT vehicles, which defeats the objective of consistent and reliable journey times, and which will add to operating costs. The greatest risk of delay arises at Merrion St. Upper/Merrion Row junction southbound and North Frederick St. northbound.
4. It is a pity that two-way running at Merrion St. Lower is not provided. I understand that space is an issue. The turns into and out of Clare St. and Lincoln Place are sharp, will cause delay, and no stop is provided here, so no need to serve them.
5. Stop in Lombard St. would be better in Westland Row at station in order to provide connection from rail. One of the key advantages of the route chosen should be to give connection between Leeson St./Earlsfort Terrace area and DART/ Suburban Rail at Pearse.
6. The road space and stopping places for Luas, BRT and other buses both northbound and southbound in O'Connell St., Westmoreland St. and D'Olier St. need to be considered as one combined plan, taking into account all public transport needs. This is developed below in a separate comment.
7. The reduction in lanes for general traffic in certain locations (notably the length of Dorset St. to Drumcondra Station) is noted. This is a necessary change and is supported.
8. Left turn at some junctions is a constraint on the effectiveness of many buslanes. The worst example on the Swords corridor is inbound left turn to Collins Ave., as traffic backing up on Collins Ave. extends into Swords Rd. and backlogs on the buslane as far as Whitehall Church. The additional lane planned will help, but if traffic backs up past the extent of the new lane, it needs to be in the general traffic lane rather than BRT lane. This will require driver education and enforcement.

Other issues that are as important as the route design include the culture that is established for other road users (general car traffic, taxis, deliveries, cyclists and pedestrians) and the operational culture and management. BRT will not work unless these are established with the same acceptance as with Luas.

Route Operational:

1. How will traffic light priority work with other vehicles using the BRT lane? Will BRT trigger light priority if there are other buses in front of it?
2. Will taxis be allowed use BRT lane? Note that taxi volume from Airport on Swords buslane is very high. Taxis using BRT lane could delay BRT progress, but not allowing them would severely congest the general traffic lane and make taxi journey times longer.
3. The general bus stops are designed to cater for one bus, but there will be many occasions when two or more buses will arrive at the one time.
4. Need to inculcate from the very beginning that right of way has to be the same as with Luas. BRT vehicles need to use same loud horn, for example, against all transgressors.
5. It is totally impractical to have cyclists sharing BRT corridor at any location. Cycle speeds are too slow, there is a growing number of cyclists, so impact on BRT progress could be quite significant. In a typical situation, with one BRT lane and one other lane, which is congested, there would be no scope for BRT to pass out a cyclist. BRT must be considered the same as Luas in regards to cyclists, a totally no go area. This must apply in city centre area as much as in the suburbs.

Detailed issues related to bus stops etc.

Care needs to be taken not to increase the walking distance for those using regular bus services. There are some cases where the plans require too long a walk, and these should be changed to limit the impact. For example:

- Inbound at Cloghran Roundabout Stop 3699 - move south to Coachman's rather than north for convenience for users
- Stop 3671 northbound at Airport Roundabout - need to keep this stop. Essential for boarding as is first stop served by both buses from Airport and those not serving Airport. Also as there are two general traffic lanes and low volume, there would be no difficulty with a BRT passing out a regular bus here.
- Stop 3670 at Kealy's (northbound at Airport) is also needed for regular buses. This is a popular boarding stop with airport workers and passengers, especially from Terminal 2. This is shown as BRT only.
- Bus stop 15 at junction Dorset St./ NCR northbound is a very popular stop, taking feed from NCR both sides also Mater Hospital. This should be kept at existing location, not moved north of Innisfallen Parade. With a reduction in traffic lanes planned, it should be possible to retain a stop here without interfering with BRT.

On a positive note, there is a good BRT/Orbital bus (17a) exchange at Coolock Lane. It would be helpful to have stops close to this location in both directions for regular buses serving Santry Village.

Note that bus stops are not identified on O'Connell St./O'Connell Bridge.

Service operational:

1. Given the high frequency, and the fact that there will be some variability in journey time, some dwell time has to be allowed for in city centre. Otherwise there will be bunching and long gaps in service before the northbound journeys even start. No matter how well the route is designed and managed, a journey time variability of at least 5 minutes must be planned for. So layover space, to accommodate at least three buses, is required at Earlsfort Terrace/Hatch St.
2. Unlike Luas and DART, these buses will not pass their depot while in service. A plan for getting vehicles and drivers to and from the operating route needs to be in place to ensure that it supports cost effectiveness and service reliability.
3. Key to customer confidence is that the service is delivered to a high standard of reliability and journey time consistency. Appropriate incentives, management practices and organisation culture need to be in place to ensure delivery of service and customer confidence at the same level that has been achieved by Luas.

Other bus services on corridor:

Due to the size of Swords and the limited penetration of housing areas by BRT, there will still be a need for a considerable number of other bus services in Swords. The frequency and reliability of BRT (more so than speed) will make more people gravitate towards it, but there will be many who will find the distance too far. Change of mode is not popular, and it would be wise to assume that people who need a regular bus to access their home/place of employment will want to use it for their full trip, rather than changing to BRT.

There will also be both CIE Group and private sector services sharing some or all of the corridor. These will include Matthews from Drogheda/Laytown (currently 4 per hour at peak); Bus Eireann 101 from Drogheda/Balbriggan (3ph); Dublin Bus 33 from Skerries/Rush/Lusk (2ph); Aircoach 700 Airport to Leopardstown via City Centre (4ph). It is not practical to either divert any of these routes, or to curtail them with a transfer to BRT. Any suggestion of doing this would have negative customer reaction. Note that Matthews and Aircoach use a very limited number of stops, while BE 101 does not carry local traffic within the BRT area. Dublin Bus 33 acts as a local service within the BRT area, but perhaps that could be reviewed. A service with no local traffic similar to BE 101 might be appropriate. So this is 13 buses per hour in addition to BRT, and this before we get the city services joining at Whitehall.

Other bus services will join the corridor, especially in the Whitehall/Drumcondra area. These will come from Santry, Beaumont, Ballymun and Glasnevin. There should be benefit to speed and reliability of these services due additional priority of BRT, but they will not be as fast as BRT due longer stop dwell times and lack of traffic signal priority.

The corridor is also joined by buses from Finglas and Cabra in the Dorset St. area. At this stage, it is quite crowded, and careful attention will be needed to avoid delay to BRT.

BRT, Luas and regular bus in the city centre area:

First point to establish is - will there be as many regular buses in city centre as there are now? With both Luas Cross-City and Swords BRT, there will be a reduction in regular buses northside, but very little impact southside. This will create issues of service reorganisation, breaking of traditional cross-city linkages, termini for southside routes that do not need a northside leg.
Luas will not have much impact on the bus network. The route mostly affected will be 120, which currently terminates in Parnell St. and does not penetrate the city centre. There may be a reduction in demand for northern leg of route 46a.
BRT should effectively replace route 16 northside. Swords buses currently use O'Connell St. southbound, but not northbound. Other routes feeding into the corridor (44, 1, 13 and 11) will have some rationalisation, but essentially at least three of these cross-city routes will survive. Other cross-city routes to Finglas, Glasnevin, Marino, Cabra and beyond (4, 9, 38, 40, 122, 123, 140) should be largely unaffected, as will radial route 40d. So Luas is likely to have little impact on regular buses through the city centre, while BRT will impact some northside buses, while the southside legs will still be needed. Present number of cross-city routes on this corridor is 13 and could reduce to 11. Peak frequency of 70 buses per hour (O'Connell St. northbound) could reduce to about 56 per hour.

North Frederick St. southbound - currently bus speed here is very slow, due high volume of buses in single lane and multiphase lights at Gardiner Row. Needs to be addressed if BRT is to achieve satisfactory progress.

Parnell Square southbound - may be congested, especially as street is narrower to accommodate northbound BRT. Many buses on regular Dublin Bus routes will have longer than normal dwell time due driver handover. This is unavoidable. See separate comments on driver handover.

O'Connell St. southbound - Why no BRT stop in Lower O'Connell St. to connect with Luas Red Line? Also note existing bus stops in Upper and Lower O'Connell St. are not shown. Bus stops in O'Connell St. are critical. The opportunity of BRT should be used to increase the number of bus stops in Lower O'Connell St. to facilitate convenient locations for access to shopping etc., also connection with Luas Red Line.

D'Olier St. southbound - good idea to separate BRT from other buses, and to install a central bus stop island. However, the volume of buses that require to either traverse or stop in D'Olier St. is very high, and will not change significantly due to either Luas CrossCity or BRT as neither is serving any new southside locations. There may be a considerable reduction in D'Olier St. buses when other BRT lines are built, but not untill then. Note also the loss of College St. and Lower Grafton St. stops due Luas, which puts even more pressure on D'Olier St. for both boarding and alighting of cross-city bus routes. It helps that some regular buses can use the BRT lane, but where will they stop to pick up and set down? The one lane to the right of regular bus island stops will not be sufficient for the volume of buses that use this street. The intent to use multiple buses at one stop at a time is a good one, this will help.

Westmoreland St. and O'Connell St. northbound

The northbound situation is more complicated due to sharing the street with Luas. Good to see Luas lanes are earmarked as "Luas and BRT". This makes more efficient use of what would otherwise be very under-utilised road space. However, the benefit is limited seeing as there are so many Luas stops, and the stops are not shared, i.e. BRT using Luas line would only be on very short stretches. The single lane allocated to the estimated 56 other buses per hour is totally inadequate. Currently, both northbound lanes in O'Connell St. are used by high volumes of buses. All buses need to be able to share the Luas line.

A comparison of expected demand for Luas CrossCity and Swords BRT shows that BRT will have 30% to 60% more passengers than Luas, both northbound and southbound, in O'Connell St. in morning peak. It also shows that BRT boardings and alightings in O'Connell St. will be up to 2.5 times those of Luas CrossCity. Luas, on the other hand, will have more loadings and boardings at Westmoreland St./Trinity. Taking the broader picture, peak loading on BRT in both directions (Drumcondra) will be 40% to 50% more than peak loading on Luas CrossCity on the northside (even with DIT Grangegorman in place). These are rough figures interpreted from the loading, boarding and alighting demand forecast graphs in NTA documents (Luas CrossCity Business Case; BRT Swords Route Options Assessment Report).

COMPARISON OF LUAS BROOMBRIDGE AND BRT SWORDS

	Luas Broombridge	Luas Broombridge	BRT Swords	BRT Swords	Ratio BRT/Luas
Annual passengers (m)		10.5		24.6	234%
Morning peak data					
Loading northbound	Upper O'Connell St.	1800	Rotunda	2300	128%
Peak loading northbound	Grangegorman	1800	Drumcondra	2500	139%
Boardings northbound city centre		600		1400	233%
Loading southbound	Parnell St.	1300	Rotunda	2050	158%
Peak loading southbound	Grangegorman	1500	Drumcondra	2300	153%
Alighting southbound city centre		550		1400	255%
Unit costs					
Capital cost €M		368		265	72%
Distance km		5.6		23.1	413%
Cost/km €M		65.7		11.5	17%
Capital cost per annual passengers		€35.0		€10.8	31%

Loading is everyone on board at that point. Boarding is those getting on at a stop
Data from Luas Business Case and BRT Route Options Assessment Report
Data may not be exactly comparable due different years (both demand and cost)
City Centre is the overlap area between Rotunda and Trinity College

This is a critical issue, and it begs the question of how our scarce city centre street infrastructure is being used optimally to provide mobility for the citizens of Dublin, and to maximise the economic and social benefits that derive from public transport. It is clear that the road space priority being given to Luas CrossCity is wholly inefficient, which is having a negative impact on the street space available for transport to other parts of the city, and therefore on the mobility and economic benefits that can be derived.

For example, in dismissing Marlboro St. as a possible southbound BRT route, the report states:
"Luas CrossCity will be the priority service on this street and Swiftway would therefore have to operate on secondary priority". Given that Swiftway will be carrying significantly more passenger both into and through this area, why should Luas be the priority service? Are we serious about investment in public transport to facilitate mobility for as many people as possible, or are we prioritising one mode over another for other reasons?

So why do we have a stop in Lower O'Connell St. for Luas, yet none for BRT or for the other 11 bus routes? Given that BRT on its own has more passengers in O'Connell St. than Luas, surely it can deliver more connecting passengers to Luas Red Line? Also the other 11 bus routes can deliver connections to Luas Red Line.

Parnell Square northbound
It is not practical to route all regular buses through Parnell Square East and North Frederick St. for a number of reasons:

- capacity at the Frederick St./ Dorset St. junction would be inadequate. Currently buses use two lanes exiting Granby Row, and this is necessary to cope with the volume of buses here
- many of the routes continue up Western Way, and it would be a difficult manoeuvre to get them back on track
- long dwell times at Parnell Square due driver handover requires additional space, which is available on Parnell Square West.

It should be a working assumption that, for these reasons, all buses other than BRT will continue to use Parnell Sq West. This gives BRT a better flow on both Parnell Square and North Frederick St. As BRT will only need one lane, it also gives more space for southbound traffic on Parnell Sq., which would otherwise be quite restricted.

Driver handover
The driver handover issue is worth some comment. Luas and DART have the luxury that all operating lines pass depots, and driver change can easily be done there. This is not the case with the vast majority of Dublin Bus routes. With one meal break on a typical working day, each bus needs a driver change on average every 3.5 hours. Some decades ago, with cross-city routes taking 40 - 45 minutes for a single journey, that meant 20% of journeys required driver change. Now some cross-city routes are up to two hours long, so driver change is needed on about 50% of trips.

There is no practical or cost effective alternative to having driver change at city centre on most routes. Any other arrangement would be costly in terms of drivers needed for

the same schedule and/or buses needed for the same schedule. Other arrangements would reduce flexibility and probably incur larger overhead costs.

Driver change is normally quick, taking about one minute, but it is longer than a normal bus stop dwell time. There will be times, inevitably, that it takes longer. With journey time variability, at times buses arrive at Parnell Sq earlier than expected, and taking up driver may not be there. With RTPI, this can be overcome, but it requires driver flexibility and goodwill. Overall impression is that long dwell times are far less frequent than in the past, but some allowance needs to be made, and this requires some additional bus stop space.

Proposal is that, given the above issues, only BRT routes northbound via Parnell Sq East and Nth Frederick St., with all other buses using Parnell Sq West. Arrangements for Luas on Parnell Sq South can be similar to Beresford Place and James's St. with shared running. Note that Luas trams will only operate along Parnell Sq South about once every 8 minutes in each direction most of the day, while buses are about one a minute. Clearly Luas use is insufficient to merit exclusive or priority use of this stretch.

Impact on other public transport users:

Unlike Luas, BRT is not claiming exclusive use of a corridor and is not pushing out other public transport to fewer streets or less convenient streets. There is some shifting of bus stops and very little rerouting of other buses. The investment in BRT corridor should have a positive impact on other bus routes sharing that corridor. So the impact on other users should be generally positive.

As with Luas, BRT will attract customers from a larger catchment area (once credibility of frequency and reliability is gained). This will have a negative impact on demand for other routes, and will inevitably lead to lower frequency and/or route restructuring, as happened in the Luas corridor. So there will be some areas within 10 to 20 minutes walk of BRT that are likely to have a reduced bus service.

[redacted]

Submission on NTA proposal for BRT, Swords to Dublin City.

1. Removal of the roundabouts on Swords bypass is a regressive step. The roundabouts were installed to assist with traffic flows, to remove them and incorporate pedestrian crossings will result in extreme traffic congestion, particularity at Malahide roundabout.
2. Pavilions shopping centre has planning permission for significant expansion. The BRT proposal does not consider additional vehicular traffic generated as a result of this planned expansion.
3. Residential areas around Pavilions Shopping centre are already congested with both shoppers and commuter cars. How does the NTA propose to deal with this issue?
4. The routing of the BRT along the median of dual carriageway at Swords will cause additional cost and disruption when Metro North is under construction, how does NTA propose to deal with this?
5. Construction of BRT on Balheary Park is in contradiction with Fingal Co Co development plan which has designated this space as amenity.
6. BRT will result in further delays to Metro North.
7. Journey times to City Centre are overly optimistic as BRT from Whitehall to City centre will share road space with other buses and taxis which will have to stop on BRT corridor to allow passengers to alight.
8. Swords Express already provides an efficient bus service to and from City Centre. BRT will not provide faster travel times.
9. At Swords Central BRT stop, passengers will have to cross 4 lanes of traffic to reach the platform.
10. The representation of BRT crossover facility at Pinnock Hill is a total fudge by the planners. There is no detail as to how this will operate in practice along a busy road. The planners have shown to traffic management and no road markings on the map as I reckon they haven't a clue how this will operate.
11. One of the key characteristics of BRT is that it uses shared bus/BRT lane of BRT only lane. This statement is untrue as BRT at Coolock Lane interchange

shares road space with all traffic.
In summary, the BRT doesn't deliver any savings in journey times that are either currently provided (by Swords Express) or could be provided by implementing an "off vehicle" ticketing system for Dublin Bus, coupled with less bus stops.

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NATIONAL TRANSPORT AUTHORITY
DUN SCEINE
HARCOURT LANE
DUBLIN 2

Dear Sir/ Madam,

I am writing with regard to the public consultation phase of the proposed introduction of Swiftway Bus Rapid Transit.

I am the owner of Cheek 2 Cheek Beauty Salon, located at 93 Swords Road, Whitehall, a business that has traded in this location since January 2006.

I would like to raise two issues of concern regarding alterations that have been proposed to facilitate the scheme. These are: the ban on southbound traffic turning right from the Swords Road onto Iveragh Road; and the proposal to remove the parking spaces located at the pedestrian traffic lights on the Swords Road.

Access to Iveragh Road from Swords Road

It is necessary for many of my clients to drive to my premises, for reasons of advanced age and/ or reduced mobility. By placing a ban on traffic turning right from the Swords Road onto Iveragh Road the Authority would be forcing these drivers to access my premises by driving through the Iveragh housing estate. The roads in this estate are very narrow and an increase in the through-flow of traffic can only be a danger to the residents of the estate, many of whom are young children.

Loss of Parking Spaces on Swords Road

As stated previously, some of my clients suffer from reduced mobility. The fact that my premises is located upstairs already presents a challenge to these clients. If they also lose the ability to park beside my salon, these clients will simply be unable to continue to frequent my business. This will obviously result in a loss of business for me, at a time when keeping our heads above water is a constant struggle.

[redacted]

Comments:
Hi
I have concerns with the following re. the Swiftway proposal.
– Removal of grass verges and trees along Glen Ellen Road (particularly in front of Castleview Row). This will mean we are directly fronting onto a road which is busy and people are prone to speed here. There are a lot of children in this area also. I have huge concerns with the safety of this proposal.
– In addition, there will be a huge amount of additional traffic with new Millers Glen Development.
– The increase in parking in the castleview, glen ellen area if people are using this service. Also, parking being removed from applewood community centre is a big disadvantage.
– Removal or reducing in size of Skate park which is a very popular amenity for children in area.
– I feel this is just a government plan so that the Metro North project can disappear, which is what the people of Swords need not another bus adding to congestion. WE DO NOT NEED MORE BUSES IN SWORDS!!!

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[redacted]

Comments:
To Whom it May Concern,

Please find attached my Public Consultation submission in respect of the planned Swiftway Bus Rapid Transit – Swords/Airport to City Centre.

[redacted]

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This section of the proposed route flies in the face of due diligence in respect of proper planning and assessment of local transport objectives and requirements as set out by an elected body for an area, which in turn will lead to unnecessary and unacceptable impacts upon the receiving environment.

While the Route Options Assessment Report assesses transport planning policy documents in respect of the proposed scheme, and states in its conclusion (Section 2.8) that '*The need for the scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North. BRT is identified as serving this purpose and allowing key development areas such as Swords to continue to develop in advance of this*'. The route selected does not take account of the transport objectives within the Fingal Development Plan 2011 to 2017 or the specific objectives of the Oldtown – Mooretown Local Area Plan (LAP).

Within Section 6.2 of the Route Options Assessment Report, where the stage 1 assessment is carried out, a specific route option should have been assessed in accordance with the Key Transport objective of the Oldtown – Mooretown Local Area Plan, i.e. Section 3.2.7 of the LAP 'Quality Bus Network'. This quality bus network route was based upon an Integrated Traffic Model which was prepared for Swords as part of the document 'Your Swords, An Emerging City, Strategic Vision 2035'. The absence of this route which would have been in accordance with Fingal County Councils transport policy for the local area, shows an absence of proper planning assessment within the Route Selection process.

The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellen Road extension, in particular in respect of Section 3.2 'Movement Strategy and Transportation Infrastructure', where section 3.2.5 'Glen Ellan Main Street' of the LAP sets out the proposed objectives of the LAP for the Glen Ellan Road. The LAP objective is for a 6m carriageway with cycle facilities, 4m wide footpaths and 1.5m wide tree lined verges, whereas the BRT is proposing 13m wide carriageway with 2m wide shared surface cycle facilities, 2m wide footpaths and the omission of the tree lined verges. While Section 6.3.2 of the Route Options Assessment Report references the LAP, it then proceeds to disregard the requirements and objectives of the LAP without taking due cognisance of it as a constraint upon the proposed scheme.

Through breaching specific objectives of the LAP, e.g. Key Objectives Transport '*Redesign the Glen Ellan Road Extension so that it's function changes from a distributor road to a main street, which will serve 2 schools, a large park and Local Centre, in addition to dwellings*' the proposed route as planned will have a direct and unacceptable impact upon the existing properties which bound the Glen Ellan distributor Road in respect of noise, air quality, road safety, transport integration, landscape and visual.

Through the planned frequency of buses along this route at 4 minute intervals during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of such duration that it will be in breach of Statutory rights of the residents in accordance with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe), which will subjected to the unacceptable levels of noise.

As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not taken into account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.

At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together and Gaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.

Added to this is the increased road safety issue which would have been identified had a Stage F road safety audit been carried out as the site lines at the estate entranceways are proposed to be substantially reduced due to the increased carriageway width and the proposal to replace the existing footpath/ verge/ segregated cycletrack (circa 5m) with a 2m footpath.

Finally, in response to the economic appraisal carried out as part of this route assessment and in particular the emphasis in the reliability of the journey time in promotion of the BRT. It is of note that while the BRT may replace and improve upon existing public buses, there already exists a private express bus service, serving the Glen Ellan distributor road which provides sufficient frequency and reduced travel times in comparison to the public bus service. As such there could be no appreciable cost benefit in spending money on a service to double up and compete with that already in place.

Whereas should the final section of the BRT follow that proposed within the Oldtown – Mooretown Local Area Plan and the report, 'Your Swords, An Emerging City, Strategic Vision 2035' it would complement the existing transport provisions to the Swords Area, improving the service to a catchment area not already served by a reliable express service and it may make economic sense.

[redacted]

[redacted]

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Through the planned frequency of buses along this route at 4 minute intervals during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of such duration that it will be in breach of Statutory rights of the residents in accordance

with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe), which will subjected to the unacceptable levels of noise.

As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not takeninto account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.

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[redacted]

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[redacted]

Comments:
Please see attached which I fully support.Also, money would be better spent on providing additional buses for Dublin Bus and Swords Express until Metro North can be delivered. Don't see the point in spending millions on this crazy project to save a few minutes on journey times with all the inconvenience it is going to cause. What Swords needs are more express buses at peak times using the port tunnel. Give the two bus companies the funds to buy more vehicles.

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To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

How to Submit This Form
By Post To: BRT Consultation, National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

[redacted]

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[redacted]

Sent from my iPhone

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[redacted]

Comments:
To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

• The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

• Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

• Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Impact on Cyclists

Specifically on Glen Ellan Road.

Swords has a very large cycling club and lots of cycling enthusiasts. One recording application alone (Strava) indicates over 200 sports cyclists currently use Glen Ellan road as part of their training route.
The route is used by countless cycling commuters and the existing cycle paths are used by parents and young children.
The proposed bus design lacks the manoeuvrability to safely over take cyclists currently using this road.
Bendy buses as they have been referred to have been tried and failed by Dublin bus and deemed not suitable for Dublin streets because of their poor manoeuvrability .
Removing the grass verge and having heavy vehicles pass within inches children or adults using the proposed new cycle lane is nothing short of dangerous.
The draft from the heavy vehicle causes and initial push away followed by a suck towards the side of the vehicle. With the grass verge removed there is no

buffer zone between cyclists or for that matter children, adults or pets from this large bus. The grass verge apart from adding to the street scape forms a vital safety buffer between the pedestrian, cyclist and traffic as it stands.
It would be much more suitable to provide a park and ride facility with secure space for bicycles in a central accessible area in swords as was the plan with Metro north and keep the housing estates the safe environment they are currently.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

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I look forward to the outcome of the consultation process.

[redacted]

[redacted]

To whom it may concern

I wish to submit my objection in respect of the proposedSwiftway Bus Rapid Transit – Swords/ Airport to City Centre, with particular emphasis upon the selected emerging preferred route for the BRT from the R132 at the Estuary Roundabout through the Glen Ellan distributor Road to the proposed terminus in Oldtown.

This section of the proposed route flies in the face of due diligence in respect of proper planning and assessment of local transport objectives and requirements as set out by an elected body for an area, which in turn will lead to unnecessary and unacceptable impacts upon the receiving environment.

While the Route Options Assessment Report assessestransport planning policy documents in respect of the proposed scheme, and states in its conclusion (Section 2.8)that '*The need for the scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North. BRT is identified as serving this purpose and allowing key development areas such as Swords to continue to develop in advance of this'*. The route selected does not take account of the transport objectives within the Fingal Development Plan 2011 to 2017 or the specific objectives of the Oldtown – Mooretown Local Area Plan (LAP).

Within Section 6.2 of the Route Options Assessment Report,where the stage 1 assessment is carried out, a specific route option should have been assessed in accordance with the Key Transport objective of the Oldtown – Mooretown Local Area Plan, i.e. Section 3.2.7 of the LAP 'Quality Bus Network'.This quality bus network route was based upon an Integrated Traffic Model which was prepared for Swords as part of the document 'Your Swords, An Emerging City, Strategic Vision 2035'. The absence of this route which would have been in accordance with Fingal County Councils transport policy for the local area, shows an absence of proper planning assessment within the Route Selection process.

The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellen Road extension, in particular in respect of Section 3.2 'Movement Strategy andTransportation Infrastructure', where section 3.2.5 'GlenEllan Main Street' of the LAP sets out the proposed objectives of the LAP for the Glen Ellan Road. The LAP objective is for a 6m carriageway with cycle facilities, 4m wide footpaths and 1.5m wide tree lined verges, whereas the BRT is proposing 13m wide carriageway with 2m wide shared surface cycle facilities, 2m wide footpaths and the omission of the tree lined verges. While Section 6.3.2 of the Route Options Assessment Report references the LAP, it then proceeds to disregard therequirements and objectives of the LAP without taking due cognisance of it as a constraint upon the proposed scheme.

Through breaching specific objectives of the LAP, e.g. Key Objectives Transport '*Redesign the Glen Ellan Road Extension so that it's function changes from a distributor road to a main street, which will serve 2 schools, a large park and Local Centre, in addition to dwellings*' the proposed route as planned will have a direct and unacceptable impact upon the existing properties which bound the Glen Ellan distributor Road in respect of noise, air quality, road safety, transport integration, landscape and visual.

Through the planned frequency of buses along this route at 4 minute intervals during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of such duration that it will be in breach of Statutory rights of the residents in accordance

with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe), which will subjected to the unacceptable levels of noise.

As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not takeninto account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.

At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together andGaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.

Added to this is the increased road safety issue which would have been identified had a Stage F road safety audit been carried out as the site lines at the estate entranceways are proposed to be substantially reduced due to the increased carriageway width and the proposal to replace the existingfootpath/ verge/ segregated cycletrack (circa 5m) with a 2m footpath.

Finally, in response to the economic appraisal carried out as part of this route assessment and in particular the emphasis in the reliability of the journey time in promotion of the BRT. It is of note that while the BRT may replace and improve upon existing public buses, there already exists a private express bus service, serving the Glen Ellan distributor road which provides sufficient frequency and reduced travel times in comparison to the public bus service. As such there could be no appreciable cost benefit in spending money on a service to double up and compete with that already in place.

Whereas should the final section of the BRT follow that proposed within the Oldtown – Mooretown Local Area Plan and the report, 'Your Swords, An Emerging City, Strategic Vision 2035' it would complement the existing transport provisions to the Swords Area, improving the service to a catchment area not already served by a reliable express service and it may make economic sense.

[redacted]

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Comments:
1. Assuming Swiftway will have full Off-Bus ticketing,and will be fully integrated with whatever Ticketing system is then operational on Dublin Bus core routes I would strongly recommend a higher off-peak frequency combined with full 24 hour operations on the initial Swiftway route.(Off Peak ridership to be stimulated by targeted Leapcard specific time based discounting)

Currently,travellers using the earliest departures from Dublin Airport (06.20 departures)do not have mainstream public transport access to the airport to allow for even a minimal 1 hour check-in time (NB:In this instance I do not class added-value luxury services such as Aircoach as being mainstream).

I would suggest a minimum headway of 30 minutes between 00.00 and 04.00.

2.I would also strongly favour Taxi's being restricted from entering the Swiftway lanes.
If Taxi's are to be allowed,it should be by specific and visible Roofsign or Permit,which would be purchased from the NTA/Swiftway under certain conditions,such as the Picking Up and Setting Down of passengers at a limited set of Taxi Specific locations en-route.

3.The provision of High-Quality Park & Ride facilities will be a pre-requisite for success of Swiftway.
Currently there appers to be little actual reference to how Swiftway operation is going to impinge upon general Traffic Roadspace,as somebody throughly familiar with the Whitehall-Earlsfort Tce corridor,it is readily apparent that General Traffic volumes will have to reduce,either voluntarily or by imposition of significant restrictive measures.

As a short term measure I would suggest investigating the provision of pre-fabricated Multi-Story Car Parking facilities along these lines…

http://www.anotherlevelcarparks.co.uk/
http://www.cornerstonegroupasia.com/Modular-Car-Park-page-36.html
http://www.steelconstruction.info/File:M1_Fig47.jpg

The focus would have to be on providing secure and user friendly facilities,again perhaps utilising Leapcard to incentivize usage.

One possible location which could be surveyed for such a facility is the current surface car park at Whitehall Church.

4 The interoperability with pre-existing Dublin Bus services also remains unclear,I would suggest that maximizing this is a definite positive marketing point. I would sugggest the Parnell Square-O Connell St routing be Swiftway specific,with the majority of paralell running Dublin Bus services thus being directed via Gardiner St or Dorset St-Bolton St-North King St/Capel St (All locations currently poorly served by mainstream public bus transport).

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To The BRT Project Manager

Following a review of the preferred route for the Swiftway Bus Rapid Transit Scheme, I would like to make the following submission. I am against the proposed route as it will have an adverse affect on the residents of the housing estates located along the Glen Ellan Road. The proposed Swiftway BRT route along The Glen Ellan Road will be disruptive to residents of the housing estates along this road and it will negatively impact on the residential amenities and the quality of life of the residents of these estates.

The Glen Ellan Road which runs along side a number of housing estates will become a major four lane road. It will have in excess of 300 Swiftway vehicles on a weekday passing from 6.00am in the morning to 12.00am at night at frequencies of up to every four minutes during peak commuter travel times. This level of Swiftway traffic will have a major impact on the area in terms of noise levels, air quality and vibrations, which will affect the residents of the house within the estates along the Glen Ellan Road. In making the decision on the choice of propulsion system, I think that careful consideration needs to be given to the use of an electric propulsion system to eliminate emissions and reduce noise levels, as opposed to a diesel powered propulsion system.

The proposed plan for the Swiftway route involves the acquisition of land from some of the estates along the Glen Ellan Road to facilitate the BRT lanes and Swiftway stops. This will have a negative impact on the residents of these estates by removing green areas that are currently used for recreation and by bringing the perimeter fencing of these estates into very close proximity with houses in certain parts of the estates. This will result in the Glen Ellan roadway (incorporating the BRT lanes) becoming very close to houses along the front of these estates and this will result in increased noise levels and vibrations for the residents of these houses.

There are two primary schools (Gaelscoil Bhrian Bóroimhe and Swords Educate Together national school) and a community centre (Applewood community centre) located along the Glen Ellan Road quite close to the proposed location of the BRT terminus. The proposed Swiftway vehicles will present a danger to

schoolchildren and will result in increased traffic congestion at school drop-off and pick-up times. The BRT lanes are proposed along the kerbside and this will present a further risk to both pedestrians and cyclists and it will also require residents living in the housing estates along the Glen Ellan Road to cross over a BRT lane when entering and exiting the housing estates.

The Glen Ellan Road is currently subject to traffic congestion at certain times of the day with queues of traffic building on the approach to the two roundabouts and at the traffic light junction with the Balheary road. These queues can make it difficult for residents of the housing estates along the Glen Ellan Road to exit the housing estates at these times. The addition of the BRT lanes with Swiftway vehicles passing at intervals of every four minutes during peak commuter travel times will add to the congestion problems and the difficulties in exiting housing estates and will result in an increased potential for accidents.

The proposed plans involve the removal of the existing roundabouts along the Glen Ellan Road and the R132 and replacing them with fully signalised junctions. This will create numerous fully signalised junctions that commuters will have to travel through and in particular commuters traveling in the direction of Dublin city centre. Traffic light sequences will have to allow for the Swiftway vehicles which will be given priority and this will add to the travel times for other road users.

There are limited parking facilities planned along this route and in the vicinity of the BRT terminus. It is therefore likely that commuters who wish to use Swiftway will park their cars in the housing estates along the Glen Ellan Road and walk to a Swiftway stop. This will negatively impact on the residents of the housing estates along the Glen Ellan Road and it will present a safety risk to the numerous children who live in these estates due to the additional traffic volumes and numbers of vehicles parked in these estates which will restrict visibility.

There is a possibility that in order to deter Swiftway commuters from parking in these housing estates, pay and display parking arrangements could be introduced in the housing estates which will inconvenience the residents living in these housing estates and result in visitors having to pay for parking.

In Summary, I am opposed to the Swiftway BRT corridors being constructed along the Glen Ellan Road. I believe that the frequency and volume of Swiftway vehicles and the times of operation will have a negative impact on the residents of the housing estates along the Glen Ellan Road. The Swiftway vehicles will create safety issues for children and pedestrians and have a negative environmental impact through increased emissions, noise, vibrations and the potential use of the housing estates for parking by Swiftway commuters.

The Swiftway vehicles travelling along this road will increase traffic congestion in this highly residential part of Swords and this problem will only increase in future years with the construction of further housing Developments (including the Millers Glen development currently under construction).

I believe that a better solution would be to locate the BRT terminus along the Balheary road and to construct a large park and ride facility and bicycle parking facilities beside the terminus. This area is not highly populated with residential units and there is available land in this area, with the Metro North terminus having previously been considered in this area. Consideration should also be given to running a shuttle bus service between Swords Manor and the BRT terminus at peak commuting times which would serve the housing estates along the Murrough Road and Glen Ellan Road. This proposal would eliminate the need to construct the Swiftway BRT corridor along the Glen Ellan Road which runs through a heavily populated residential area.

I would be much obliged if you could confirm receipt of this submission.

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[redacted]

Comments:
I/We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.
My/Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.
I/We have a number of concerns regarding this route:
1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.
2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.
3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.
4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.
Le meas/Yours sincerely,

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[redacted]

From: Tim Hayes
Organisation: Chartered Institute of Logistics and Transport
Address: 1 Fitzwilliam Place, Dublin 2

Comments:
On behalf of the Chartered Institute of Logistics and Transport please find attached

SUBMISSION FROM THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN IRELAND TO THE NATIONAL TRANSPORT AUTHORITY'S PUBLIC CONSULTATION ON THE PROPOSED SWORDS BUS RAPID TRANSIT ROUTE
Please confirm receipt of submission.

Regards,

Tim Hayes
CEO
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Introduction

The Chartered Institute of Logistics and Transport in Ireland ("the Institute") is the independent professional body for people engaged in logistics and all modes of transport. The Institute is part of an international body with 30,000 members worldwide. As a professional body, the Institute does not lobby on behalf of any sectoral interest, but seeks to take an independent, objective and considered view on matters of public policy.

The Institute welcomes the opportunity to respond to this public consultation.

Institute Strongly Supports BRT

The Institute strongly supports the proposed Swords Bus Rapid Transit project (Swords BRT) and welcomes the commitment of the NTA to develop this and a number of other BRT routes in the Greater Dublin Area. In 2012 the Institute published a policy brief on BRT which called for a fundamental rethink on the potential of bus-based transit solutions for Ireland's major urban areas. It has also organised three seminars to increase understanding and knowledge of the BRT concept, to consider potential applications in Ireland and to learn from the extensive experience of cities which have implemented BRT. The Institute will continue to do everything it can to support and promote the development of BRT in Ireland and the comments which we make below should be considered in that context.

Importance of a Holistic Approach to BRT Design

The focus of the current public consultation is primarily on the proposed route and the physical infrastructure underpinning the project. While this is of critical importance to the success of the project, it is also necessary to have a more holistic view, providing a clear understanding of all the elements of the proposed Swords BRT and how they interact. This includes an exposition of the policy context which underpins the project, greater detail on the expected medium and longer term travel demand and how the project will serve that evolving demand, a fleshing out of the bus services which it is planned to provide on the route, how existing conventional bus services will be modified and how they will interact with the core BRT services. It will also be important to understand in more detail the traffic management arrangements which will ensure that BRT services benefit from the optimum priority. We strongly urge that these issues are addressed when the project comes to its statutory approval stage; a failure adequately to do could undermine support for the project.

We reiterate the point we made in our submission to your earlier consultation that it would be very helpful if the NTA published a short statement outlining its high level policy on BRT,

explaining how it sees BRT fitting into the overall public transport network for the Greater Dublin Area and, most importantly, setting out some of the key technical and performance criteria it proposes to adopt. This would provide a benchmark against which the Authority itself and the wider public could assess specific BRT projects.

The Proposed Route

The Institute broadly supports the proposed route of Swords BRT but wishes to offer the following observations which should be addressed as the planning and design of the project proceeds:

- We strongly urge that, wherever possible, the centre of the road should be used for Swords BRT. Using lanes adjacent to the footpath risks BRT buses being delayed by left turning traffic, parking traffic, vehicles making pickups or vehicles partly parked on the footpath but partly blocking the bus lane. It is also unlikely that the current general driver culture will give BRT buses as much respect as is given to trams since drivers know that a bus can move out of a bus lane to get by while a tram cannot. The current proposals envisage very limited central lane running and we urge the NTA to continue to seek out opportunities to increase this as planning and design proceeds. The more centre lane running that is achieved, the more effective the Swords BRT will be.
- The interaction between BRT stations and conventional bus stops should be carefully assessed. There appear to be a number of locations between the city centre and Whitehall, both inbound and outbound, where conventional stops may interfere with BRT stations.
- The traffic management arrangements in the city centre are of major importance to the success of the Swords BRT. As currently proposed, there appears to be significant sharing of road space by BRT vehicles and general traffic between North Frederick Street and Earlsfort Terrace which could result in significant delays, increase journey times and reduce journey time reliability for BRT services.
- The interface between BRT, Luas and conventional bus services in the O'Connell Street/Westmoreland Street/D'Olier Street area should be considered in an integrated way and a traffic management plan prepared which effectively addresses the competing demands. Decisions should be made on the basis of the level of travel demand served by each public transport mode rather than on the basis of a pre-determined modal hierarchy. The Institute is conscious that this central area is used by a wide range of bus services accessing many parts of the city and it will therefore be important to ensure that priority for the Swords BRT (and indeed Luas CrossCity) is not at the expense of bus services to the rest of the city.
- Interchange between BRT and other public transport services should be as effective as possible. Transfer distances between stations/stops should be minimised and the routes to be taken should be as direct and legible as possible (examples of good

signposting and footpath markings at interchange points in Barcelona were shown in a presentation to a recent CILT/Engineers Ireland seminar). To improve interchange, would it, for example, be possible to move the BRT station serving Pearse railway station into Westland Row and to provide a southbound BRT station on Lower O'Connell Street to facilitate interchange with the Luas Red Line on Lower Abbey Street?

- Left turning at junctions can be a constraint, for example the inbound left turn at Collins Avenue.

Interaction between BRT and other Bus Services

It will be important to provide a clear understanding as to how BRT services will interact with other bus services on the Swords BRT corridor. This has a number of dimensions which we wish to comment on:

- How in specific terms will the existing conventional PSO bus services be modified to take account of the BRT services in the corridor?
- How will the BRT project take account of likely future developments in the public transport network? This could arise from a range of factors such as the need for interchange with future orbital bus routes or from the introduction of new routes to serve future residential or commercial development.
- It appears that the Swords BRT route will be used by other bus services, including Dublin Bus, Bus Eireann and a number of private bus services. The Institute supports this approach but it will be necessary to clearly outline how this will be accomplished in practice given the large variety of services and stopping patterns involved. We note that it is proposed to set back conventional bus stops along the BRT corridor. This is welcome and will undoubtedly help but will it be enough to ensure that the full range of other bus services using the corridor will not interfere with BRT bus services? It appears that the setback stops will only accommodate a single bus. This may not be sufficient in certain circumstances or at certain times and could result in buses obstructing BRT services as they wait to access a conventional bus stop.
- How will priority at traffic lights work in practice? Will priority simply be accorded to the first bus to arrive or will it be triggered only by BRT buses? How this question is answered will have consequences for the speed and reliability of BRT services.

Taxi Access to Swords BRT Corridor

It is not clear if taxis will be allowed to use the Swords BRT corridor. It is a particularly important issue on this corridor given the volume of taxi accessing Dublin Airport. The NTA needs to provide a full assessment of this issue. The Institute favours permitting taxis to use the corridor unless the analysis clearly demonstrates that this would have a seriously

unacceptable effect on the operation of BRT. If taxis cannot be accommodated, it will be necessary to outline what alternative arrangements are proposed.

Interaction between BRT and Cyclists/Pedestrians

The proposals for the Swords BRT corridor include significant provision for cyclists which the Institute broadly supports. However there are some issues of concern:

- Unlike ordinary bus lanes, it is likely to be inappropriate for cyclists to share the same road space with buses in the core BRT corridor, particularly where bus speeds will be high.
- There appear to be some instances where cyclists will share footpath space with pedestrians. Unless there is a physical segregation of cyclists there is a real risk that this will compromise pedestrian safety. Simply using markings to delineate exclusive space for both cyclists and pedestrians is unlikely to be enough. Experience of existing facilities which share space, such as the Clontarf-Sutton coastal pathway, demonstrate that this can create problems for pedestrians because of the speeds at which cyclists travel and the encroachment of cyclists into pedestrian space and vice versa. There is also an increasing problem of cyclists riding on ordinary footpaths and the introduction of shared facilities might reinforce the mistaken impression that this is a lawful and acceptable practice.
- In some locations it is proposed to divert cycle lanes behind BRT stations. This has the potential to create safety problems for pedestrians accessing the stations. It is also proposed that cycle lanes will be located inside BRT lanes, requiring buses to cross the cycle lanes to access BRT stations. This also has safety implications, this time for cyclists. While these arrangements may be unavoidable in many circumstances, they should be avoided wherever possible. It will also be important to undertake a safety education and promotion campaign aimed at all three categories of road user and to provide appropriate signing and marking to alert them to the dangers.

Operational Issues

There are a number of operational issues on which the Institute would like to comment:

- The Institute strongly supports the proposal to operate direct BRT services to/from Dublin Airport as well as to Swords. The direct services to and from Dublin Airport will be of benefit to two distinct travel segments – air travellers, meeters and greeters on the one hand and also people working in the Airport zone. The distinct travel needs of each segment should be assessed and catered for. The demand analysis should also be used to assess how best to meet the travel needs of the likely significant number of people wishing to access the Airport from Swords, particularly as many airport employees live in the area.

- The proposal that all ticketing on BRT services will be off-bus is most welcome and strongly supported by the Institute. However it is not clear if users of Leap cards will be able to tag on/tag off (as for rail and Luas) or will have to interact with the driver (as on conventional Dublin Bus services). The Institute firmly favours the former and strongly urges the NTA to implement this approach which already works very effectively for Luas. We also reiterate our call to the NTA to introduce this approach for all bus services. The Authority is actively promoting increased use of the Leap card and using it fares policy to strongly incentivise this. Perversely the more it succeeds, the slower bus boarding times will become as more and more Leap card e-purse users will have to interact with the driver.
- It is not clear how driver changeover will be managed given that there is no bus depot on the proposed Swords BRT corridor. This may necessitate layover facilities at some point, probably in the city centre although this is not particularly desirable because of the dearth of suitable space and the risk of delays at changeover.
- We note that the NTA proposes that Dublin Bus will operate BRT services on the Swords corridor. These services have to be delivered to the very highest standards whoever the operator is and we therefore strongly recommend that they should be covered by a special contract, separate and distinct from the general public service contract for the Greater Dublin Area. This contract should contain more challenging requirements than the general PSO contract, setting down very exacting performance standards and containing particularly strong performance incentives and penalties.

Type of Bus to be used on Swords BRT

The Institute notes that it is proposed to use 18.5 metre articulated buses, with a passenger capacity of 120 and multiple doors, on the Swords BRT corridor and that station platforms will be able to cater for longer vehicles than this. The Institute broadly supports the use of high capacity vehicles and the use of multiple doors for access and egress. However we reiterate what we said in our submission to the Authority's earlier consultation that the choice of bus to be used on the BRT network should be an output of the design studies, not an input to them. The key considerations when selecting vehicles should be: capacity and quality. It is important to purchase vehicles which deliver the optimum passenger carrying capacity and passenger experience.

The Institute has no strong views on the most appropriate type of vehicle to be used on BRT routes, but urges the NTA to make its choice with great care and only following a thorough review of practical experience on other BRT systems. No amount of desk-based analysis will replace the learning experience of travelling on a bus in actual revenue service. The passenger experience should be a very important consideration, including ease of access and egress, comfort during travel and the seating/standing ratio. There is little experience of articulated buses in Dublin but anecdotal evidence suggests that the limited earlier trials

produced some negative passenger reaction, especially from people who had to stand during their journeys. The ratio of seated to standing places will be a significant consideration and there is likely to be user resistance to standing over longer distances. Bus passengers tend to dislike standing more than rail passengers over a similar journey time because of the differences in ride quality.

The analysis should be guided by modelling and other data specific to the Swords BRT corridor, including information on journey patterns (length and time taken), boarding and alighting times, turnover of passengers per journey, seated/standing ratios and forecast standing times.

It is likely that the Swords BRT corridor, serving both the Airport and commuter zones, will have a large number of passengers making relatively lengthy journeys. If this is confirmed by the analysis, there will almost certainly be a need to provide for a higher proportion of seated passengers. Buses serving the Airport will also require a larger than normal capacity for luggage.

While we understand the desire to select a bus design that looks very different and possibly looks like a tram, we urge that the NTA adopts a precautionary approach. The emphasis should be on performance rather than perception. Select a vehicle that has a proven track record rather than one that looks good.

Will buses on the BRT corridor be conventionally powered or are alternative options such as hybrid, CNG or electric buses being considered?

We also repeat our previous recommendation that the NTA begin an early dialogue with the Department of Transport, Tourism and Sport about the scope for authorising buses up to 24 metres in length. In particular, consideration should be given to the use of a more flexible permit system which could authorise the use of longer buses in particular areas or on specific corridors like Swords BRT. This might be easier to achieve than a national authorisation applicable to all public roads.

Access Arrangements for Business

The NTA should give careful consideration to impact of reducing available road space for commercial traffic and to the adequacy of access arrangements for businesses located along the Swords BRT corridor, during construction and during subsequent operation.

An assessment should be made of the level of commercial traffic, the likely impact that the proposed re-allocation of road space will have for that traffic and the measures to be implemented to mitigate the adverse effects where no suitable alternative routes are available. Arrangements for effective consultation with commercial road users should be put in place at the earliest possible opportunity and throughout the planning and design process.

Shops, factories and other business premises have a range of access requirements which should be assessed and provided for. This includes access for deliveries, dispatch, servicing and customer/employee parking. Some premises do not have off-street parking facilities or rear access and appropriate arrangements will have to be made to accommodate them. Some dispatch/delivery operations (such as cash in transit, beer and pharmaceuticals) have significant health and safety or security implications and require special arrangements, for example parking in close proximity to the dispatch or delivery point. Confining deliveries to night time may be an option in some cases but this in turn may be constrained by restrictions on night time deliveries in residential areas or by the particular business model. It is critical that there is effective prior consultation during the planning and design process with businesses likely to be affected. This includes not only the businesses located along or in close proximity to the proposed Swords BRT corridor but also their logistics providers. It is important that the distinct perspectives of both parties are sought and understood.

Importance of Learning from Experience

BRT has been successfully implemented in a wide range of cities worldwide and it is most important that we continue to learn from the wealth of experience that has been assembled – not only the examples of best practice but also the mistakes that have been made. No two cities are alike and it will often be necessary to modify what others have done to suit our circumstances. The BRT seminars which the Institute has co-hosted included presentations from a range of cities. While the topography, layout, population density and other characteristics of those cities may be different to that of Dublin, there are still lessons to be learned and applied. They can be summarised as having a clear vision of what you want to achieve and an unwavering commitment to quality, to meeting the real requirements of passengers, to achieving value for money and above all attention to detail.

Benchmarking of Swords BRT Project

The Institute recommends that the NTA consider benchmarking the Swords BRT project against best practice. A helpful comparison could, for example, be made using the BRT Scorecard developed by the Institute for Transportation and Development Policy which assesses and scores performance under a number of headings: The BRT Basics, Service Planning, Infrastructure, Stations, Communications and Access and Integration. It can be accessed at http://www.itdp.org/library/standards-and guides/the-bus-rapid-transit-standard/.

Chartered Institute of Logistics and Transport
November 2014

[redacted]

Comments:
We did not receive official notice of this proposal even though there is a planned stop outside our home.

We would object to the removal of trees on the green area , some of these have been there for over a hundred years, we would also object to the removal of the trees on the far side of the road at the car park as it took ten years of campaigning to have this area planted.

We object to the removal of the slip road from collins avenue to the M1, this will have the effect of increasing traffic volumes on our road.

We were originally promised a wall on the grass margin area,but instead of a wall the area was fenced, now the fence is to be removed to accommodate the new bus stop.

We object to the widening of this section of the road, as it is already one of the widest sections of the entire route, and if the Rapid Transport Bus can negotiate the narrower sections of the route ,why is it necessary ?

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Comments:
See doc

the poor mans rail system. please make it stop!"!!!!!!!

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Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

· The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

· Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

· Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was

confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.
Signed enclosed.

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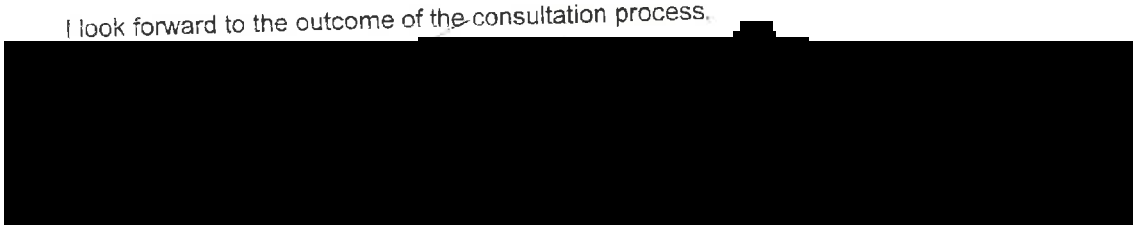

How to Submit This Form
By Post To: BRT Consultation, National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

Closing Date for submissions: Friday 28th November at 5pm

[redacted]

'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

I wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

My child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

I have a number of concerns regarding this route:

1. It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

[redacted]

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[redacted]

[redacted]

Comments:
Please see my attached letter detailing my opposition to the current scheme proposed.

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Upload this file To NTA Website at the following link:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

Closing date for submissions is Friday 28th November at 5pm

[redacted]

Comments:
To whom it may concern,

I object to the introduction of the Swiftway Bus Rapid Transit in Swords as I feel we have sufficient transportation in the area. I disagree with the proposed plans to cut into the existing roads which would cause traffic chaos in the area for some period of time. I disagree with the proposed cutting into of the park and getting rid of the Skate Park which is a great amenity for the kids of Swords. Also will there be security and RPU provided as with the Luas and trains?

[redacted]

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Comments:
Please find attached objection form

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[redacted]

Don té lena mbaineann sé

Is mian liom/linn ábhair bhuartha a ardú maidir leis an mbealach atá beartaithe don scéim nua bus sciopaidh idir Sord/Aerfort agus Lár na Cathrach.

Tá mo pháiste/í/ ár bpáiste/í ag freastail ar Ghaelscoil Bhrian Bóroimhe atá ar an mbealach atá beartaithe don scéim Nua.

Tá mé/muid buartha faoi na nithe seo a leanas:

1. Is gá do thuismitheoirí áirithe a bpáistí a thiomáint ar scoil. Má leanann an sceim ar aghaidh mar atá beartaithe, ní bheidh aon pháirceáil idir an stop ag Coill na nÚll agus an stop ag Seanbhaile. Cruthóidh sé seo neart fadhbanna do thuismitheoirí a bheidh ag iarraidh a bpáistí a thiomáint ar scoil in am agus bainfidh sé an rogha sin uathu.

2. Beidh brú ar thuismitheoirí a gcaranna a pháirceáil sna heastáit ata cóngarach don scoil (Geata Bhunbaire, Radharc an Chaisleáin agus Gleann an Mhuilleora) agus cuirfidh sé sin brú ar na heastáit chéanna

3. Caithfear bheith airdeallach ar shábháilteacht na gcoisithe agus an bealach nua á dhearadh. Níl ach dhá thrasnú beartaithe taobh na scoile agus is gá go mbeadh níos mó ann chun cur le sábháilteacht na bpáistí a shiúlann ar scoil.

4. Beidh níos mó trácht ar an mbóthar, go háirithe ar maidin agus tuismitheoirí ag iarraidh a bpáistí a sheoladh ar scoil agus cruthóidh an trácht bhreise seo contúirt sa bhreis do leanaí.

I/We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

My/Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

I/We have a number of concerns regarding this route:

1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

Is féidir an litir a úslódáil ag an nasc seo a leanas/*Upload this file to NTA Website at the following link*:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

An dáta is deireannaí i gcomhair aighneactaí ná 28-11-14/*Closing date for submissions is Friday 28th November at 5pm*

[redacted]

Comments:
We do not need another bus service that will be held up in traffic again in,Drumcondra. A rather hasty solution to the abandoned metro north which would have been a better solution. A big NO to this development.

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[redacted]

Comments:
To Whom It May Concern,

Please find attached submission from Rohan Holdings on behalf of both Rohan Holdings and Airspace Investments Ltd in relation to the proposed Swiftway Bus Rapid Transit Scheme.

[redacted]

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ROHAN
Rohan Holdings Limited
4th Floor, Block 2, Harcourt Centre, Harcourt Street, Dublin 2.
Phone: +353 1 662 4455. Fax: +353 1 676 5404
Email: info@rohanholdings.ie Web: www.rohanholdings.ie

Submission by Airspace Investments and Rohan Holdings (together 'Rohan') to The National Transport Authority in relation to the proposed Swiftway Bus Rapid Transit Scheme

This submission is made by Rohan in response to the National Transport Authority's public consultation on the proposed Swiftway Bus Rapid Transit Scheme, including the Preferred Route, for the Swords/Airport to City Centre corridor. Rohan have reviewed with interest the proposed scheme drawings and the associated impact on our lands and comment as follows.

Rohan, along with group companies, have developed and currently manage four business parks along the route of the proposed scheme and have retained ownership of the common areas, including the park entrances, on the four parks. The four parks are listed below and are identified on the enclosed drawings. It is worth noting that the estate roads within Airways Industrial Estate have been taken in charge by the local council.

- North Dublin Corporate Park, Swords Road, Swords, Co. Dublin
- North Ring Business Park, Santry Road, Santry, Dublin 9
- Furry Park Business Park, Santry Road, Santry, Dublin 9
- Airways Industrial Estate, Santry Road, Santry, Dublin 9

Rohan were contacted by Arup Engineers (the design engineers on the scheme) in October 2014, and had a follow on consultation meeting with them on 23rd October 2014 where their scheme engineer outlined the preferred route option and the associated impact on the lands owned by Rohan.

In these discussions it was noted by Arups that the proposed scheme will impact to varying degrees on all four of the estates listed above and that the scheme will entail the compulsory acquisition of property at the entrances to all four of the parks (both on a permanent and temporary basis), primarily for road widening purposes. The project engineer also confirmed that the scheme designs are still at draft stage and the full extent of lands to be impacted by the CPO process has yet to be determined. **In light of this the final scheme design will need to be reviewed before we can comment definitely on the scheme and its impact on our lands.** Pending receipt of this information we would like to have the following points noted for incorporation into the design submission to An Bord Pleanala in early 2015.

- Upon completion of the works that all accommodation works employed in the execution of the scheme be reinstated to at least the same standard of finish as currently exists in the parks. Rohan have a long tradition of developing quality business parks to a high standard of finish and request that all reinstatements works be completed to a level that at least maintains the investment value of the lands and minimises any impact on our units and the occupiers of our parks. We request that all new boundary treatments and finishes including the quality of the landscaping (both hard and soft) and the overall aesthetics of the entrances and frontages of the estates shall not by adversely impacted by the proposed works. All new entrance layouts are to be designed in accordance with Rohan standards for prestige business park design and standards. To satisfy ourselves in this regard we request that all proposed designs and finishes are reviewed and approved by us well in advance of the works commencing.

- From the scheme layout drawings received for the various parks it is noted that the lands identified for acquisition are split into lands that are required on a permanent basis and those that are required on a temporary basis. We request that all lands that are temporarily acquired for the works be returned to the land owner as early as possible following completion of the scheme and in the condition outlined in the point above.

- The future development potential of the identified parks should not be compromised by the proposed scheme. Lands acquired for the scheme may result in reduced site areas and associated reductions in site coverage for future redevelopments which would diminish redevelopment values. Due consideration should be taken to the value of the lands planed for compulsory acquisition and the related values applied to any compensation agreements. This is particularly relevant for the land take proposed to the front of North Ring Business Park.

- Consideration should also be given to any loss in value due to the removal of existing assets (whether temporary or permanent) which are located on the lands proposed for compulsory acquisition. Again this is particularly relevant (but not exclusive) to North Ring Business Park where any loss of parking spaces and the loss of premium advertising space and advertising display boards will need to be reviewed in advance and alternative solutions agreed including any relevant compensation.

- **North Dublin Corporate Park**
  In relation to North Dublin Corporate Park it is noted that substantial changes are proposed to the current entrance layout with the proposal to install a fully signalised junction at the entrance to the park. Whilst we do not object to this change in principle at this time we await confirmation from Arups as to the extent of the lands to be acquired before we can fully comment on this development. Pending receipt of this information we note the following points.

  Both the existing entry and exit slip lanes are being removed and replaced with the new signalised junction. This new junction is being provided to specifically serve North Dublin Corporate Park as the Seatown Roundabout is to be removed and hence outbound traffic from Dublin city will no longer be able to access the park in a reasonable manner without providing this new junction layout.

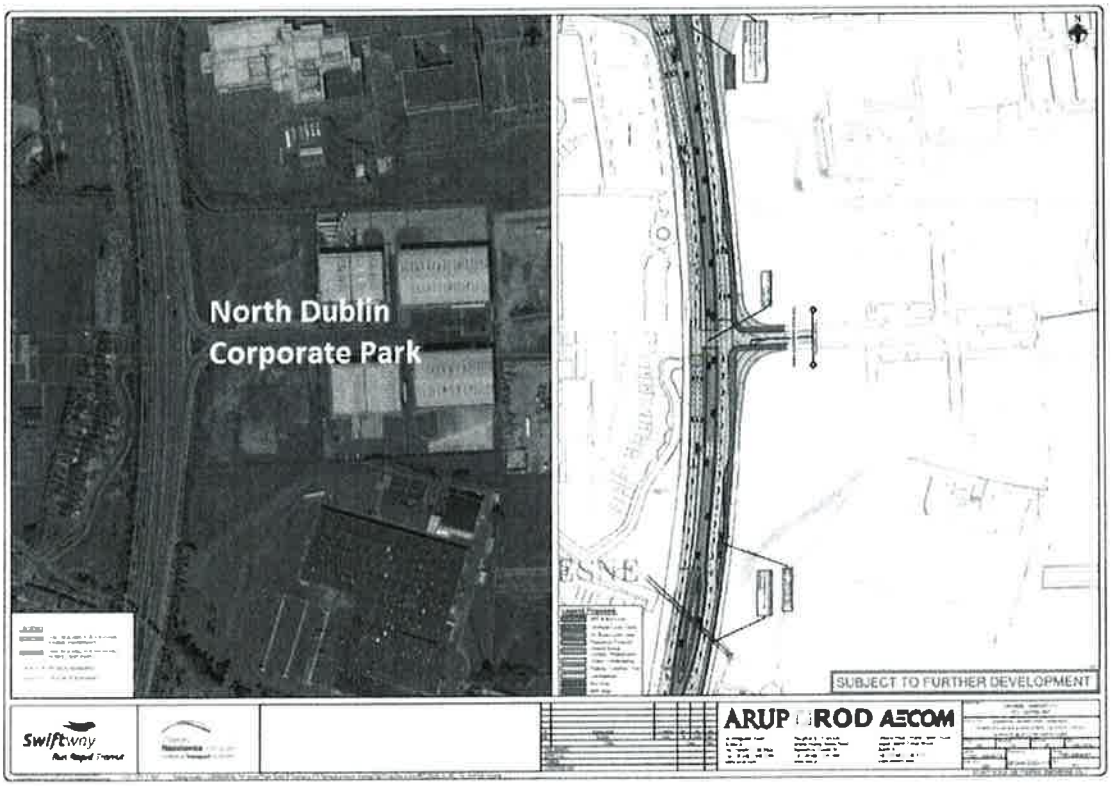
  It is important to note that North Dublin Corporate Park is a functioning business park occupied by large logistics and distribution companies and as such may have high traffic volumes running through the estate particularly when the park is fully developed. It is important that the changed entrance layout does not have a negative impact on the current and future traffic capacities within the park and that due regard be taken to the design of the new junction and associated signalling.

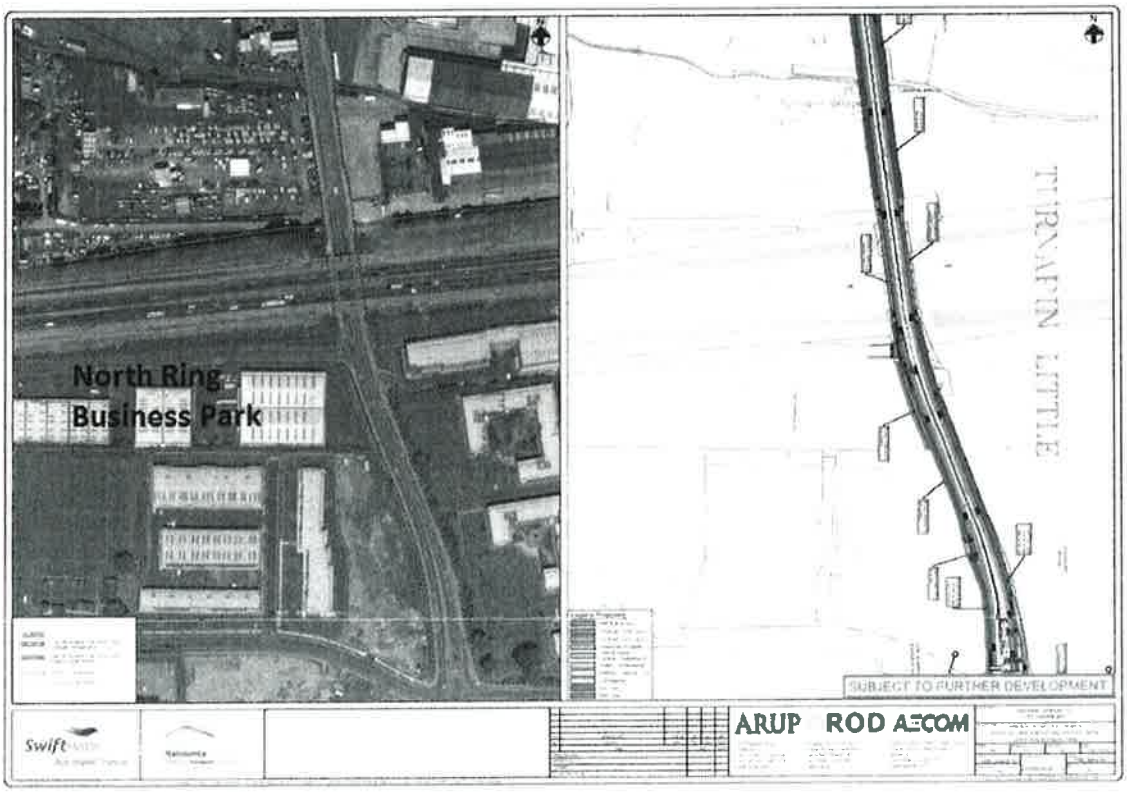
  The current park entrance has been designed to facilitate the efficient turning and movement of large articulated trucks to and from the park using the existing slip lanes. The new junction layouts need to be designed to facilitate the same efficient movement and to ensure truck turning in and out of the park works as efficiently as it is currently.

Conclusion

Whilst Rohan does not object to the proposed new bus scheme and the preferred route option in principle at this time we ask that the above observations and requests be incorporated into the plans for the scheme to ensure that the effect of our landholdings is minimised and where there are impacts of a physical or economic nature that the correct reinstatement and/or compensation practices and procedures be in place.

For on behalf of Airspace Investments Limited and Rohan Holdings Limited


North Dublin
Corporate Park
SUBJECT TO FURTHER DEVELOPMENT
ARUP
ROD AECOM


North Ring
Business Park
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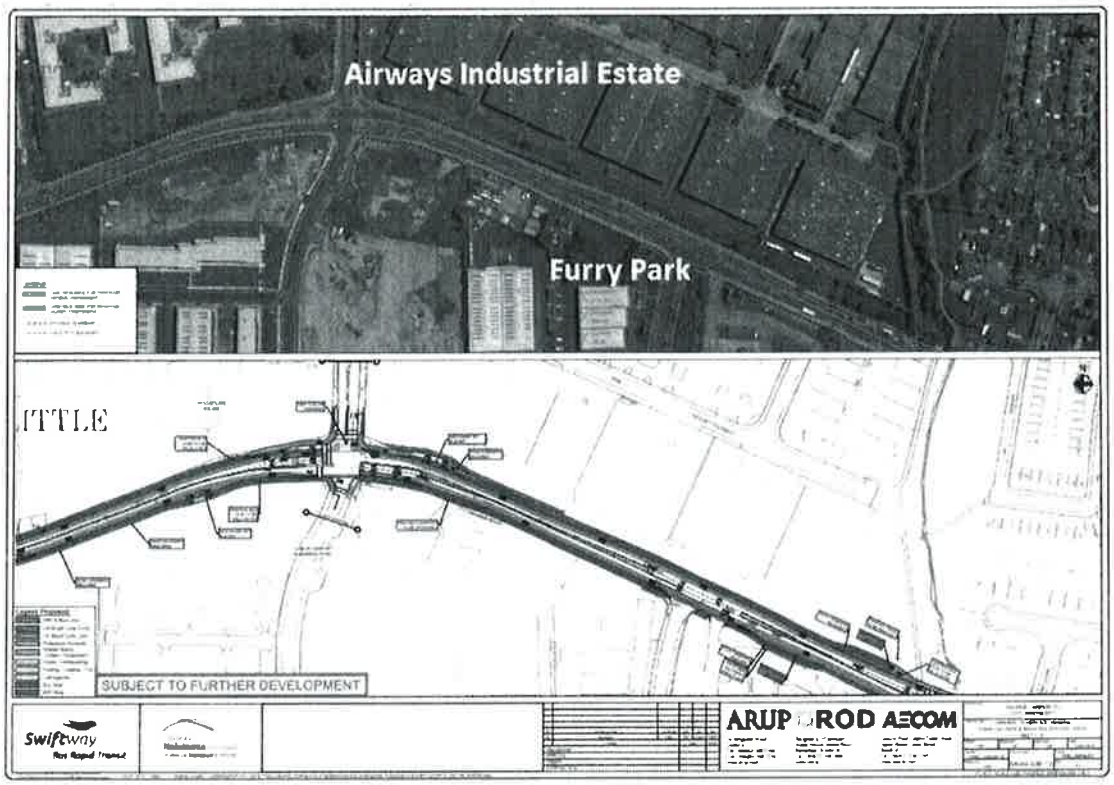
SUBJECT TO FURTHER DEVELOPMENT
ARUP
ROD AECOM


Airways Industrial Estate
Furry Park
ITTLE
SUBJECT TO FURTHER DEVELOPMENT
Swiftway
Bus Rapid Transit
ARUP
ROD
AECOM

[redacted]

From: Glen Redmond
Organisation: Rohan Estate Management Ltd
Address: 4th Floor, Blcok 2, Harcourt Centre, Harcourt Street, Dublin 2

Comments:
To Whom It May Concern,

Please find enclosed submission from Rohan Estate Management Ltd in relation to the proposed Swiftway Bus Rapid Transit Scheme.

Kind Regards,

Glen Redmond

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ROHAN

Rohan Estate Management Limited

4th Floor, Block 2, Harcourt Centre, Harcourt Street, Dublin 2.
Phone: +353 1 662 4455. Fax: +353 1 676 5404

Submission by Rohan Estate Management Ltd to The National Transport Authority in relation to the proposed Swiftway Bus Rapid Transit Scheme

Rohan Estate Management Ltd act as the managing agent for the estate management companies responsible for the below named estates -

- North Dublin Corporate Park, Swords Road, Swords, Co. Dublin
- North Ring Business Park, Santry Road, Santry, Dublin 9
- Furry Park Business Park, Santry Road, Santry, Dublin 9
- Airways Industrial Estate, Santry Road, Santry, Dublin 9

We have reviewed with interest the proposed new Swiftway Rapid Bus Scheme which runs past all of the parks listed above. As representatives of the numerous occupiers in the four estates we would like to make the following observations in relation to the bus scheme and the preferred route.

All four estates are active, busy business parks with substantial traffic volumes moving through the estates from early mornings to late evenings. The proposed works at the entrances to all four estates are quite extensive and include road widening and revising junction designs in some instances. These works will cause significant disruption to the operations of the various business within the estates.

To help alleviate this disruption we request that the programing and scheduling of the works to the above listed parks are well planned and communicated to the occupiers well in advance of the works commencing. Any works which restrict or block access or egress to the estates should be undertaken at times which will cause the least amount of disruption to the occupiers i.e. evenings and weekends. Access to the estates need to remain open at all times and any access restrictions must be kept to an absolute minimum so as to limit economic impact to occupiers.

Method statements and programs for works should be communicated to all occupiers early and regularly so that occupiers can make appropriate plans with their clients and service providers.

Any temporary shutdown of services are to be kept to an absolute minimum (including water, telecoms, drainage, gas and electricity). When such temporary shutdowns are necessary the cut-offs should be restricted to weekends and evenings and restored again as soon as possible to facilitate the normal operating of the estates.

The entrances to the estates must be kept clean and tidy and the estate roads kept clean and clear of construction debris. If the works cause the buildings within the estates to become dirty then procedures need to be put in place to wash down the buildings (and any vehicles impacted) as necessary.

The safety of all occupiers and visitors to the estates is paramount and it is requested that the health and safety of all users be prioritised and procedures are put in place to ensure there are no safety concerns.

For on behalf of Rohan Estate Management Limited

[redacted]

Comments:
'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2. Samhain 2014
Don té lena mbaineann sé
Is mian liom/linn ábhair bhuartha a ardú maidir leis an mbealach atá beartaithe don scéim nua bus sciopaidh idir Sord/Aerfort agus Lár na Cathrach.
Tá mo pháiste/í/ ár bpáiste/í ag freastail ar Ghaelscoil Bhrian Bóroimhe atá ar an mbealach atá beartaithe don scéim Nua.
Tá mé/muid buartha faoi na nithe seo a leanas:
1. Is gá do thuismitheoirí áirithe a bpáistí a thiomáint ar scoil. Má leanann an sceim ar aghaidh mar atá beartaithe, ní bheidh aon pháirceáil idir an stop ag Coill na nÚll agus an stop ag Seanbhaile. Cruthóidh sé seo neart fadhbanna do thuismitheoirí a bheidh ag iarraidh a bpáistí a thiomáint ar scoil in am agus bainfidh sé an rogha sin uathu.
2. Beidh brú ar thuismitheoirí a gcaranna a pháirceáil sna heastáit ata cóngarach don scoil (Geata Bhunbaire, Radharc an Chaisleáin agus Gleann an Mhuilleora) agus cuirfidh sé sin brú ar na heastáit chéanna
3. Caithfear bheith airdeallach ar shábháilteacht na gcoisithe agus an bealach nua á dhearadh. Níl ach dhá thrasnú beartaithe taobh na scoile agus is gá go mbeadh níos mó ann chun cur le sábháilteacht na bpáistí a shiúlann ar scoil.
4. Beidh níos mó trácht ar an mbóthar, go háirithe ar maidin agus tuismitheoirí ag iarraidh a bpáistí a sheoladh ar scoil agus cruthóidh an trácht bhreise seo contúirt sa bhreis do leanaí.
I/We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.
My/Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.
I/We have a number of concerns regarding this route:
1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be

able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.
2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.
3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.
4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.
Le meas/Yours sincerely,

[redacted]

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Comments:
My submission is on the attached word document

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Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre

Having reviewed the proposed BRT Plan for Swords at the Public consultation in the Fingal County Council Civic Offices on the 4th November 2014 and information on the NTA Website for Swords BRT, I wish to make the following submission:

Bus Rapid Transit (BRT)

- BRT has not been fully explained. Where does this fit into the overall Public Transport plans for Dublin. I.e. Connectivity with other transport modes and centres, future transport policy.

- BRT is not a proven means of transport for all cities. It is a relatively new concept. Each city varies and therefore no two cities can be compared like for like when replicating BRT. e.g. Dublin cannot be compared to Toulouse in France for BRT

- The projected cost of BRT (Swords) is €200/250m. This is in my opinion a lot of money to spend on this type of project. There would be a better return on this money economically and environmentally if spent on the Metro North Project

- BRT (Swords) makes no use of the Port Tunnel to save time. It is suppose to be a rapid transit system.

Planning

- The National Transport Authority (NTA) is not independent of Government. It only implements current Government Policy. There has not been sufficient debate on what is the best long term solution for Swords (BRT v Metro) and this proposal is being rushed in ahead of the next general election.

- There needs to be a strategic long term plan developed for Public Transport in Dublin as opposed to badly thought out plans like the Cross City Luas Line. This Strategic Plan should be completely independent of Politicians and reviewed on a yearly basis.

Bus Rapid Transit (Swords v Metro North)

- The Swords BRT scheme is in my opinion being put forward as a replacement for the Metro North Project. It proposes using the centre median on the Swords Bypass that was to be used by Metro North. There is also a proposed separate Dublin City to Dublin Airport BRT Route. This is a waste of resources.

- BRT is being put forward based on cost savings only. This is a mistake.
  I do not think BRT is the correct solution for Swords, the Airport and North County Dublin based on current car usage and the projected growth in housing for North County Dublin in the long term.

- The Metro North project was developed over a longer period of time and it includes two park & ride facilities that are very much needed. It is a well thought out plan and €30 million to date has been spent on it. There are no park & ride facilities for the proposed Swords BRT scheme. BRT does not have the carrying capacity of a Metro at peak times.

- At present Swords is reasonably well served with Buses by Dublin Bus and the privately operated Swords Express.

Articulated Buses

- The type of Buses being suggested for BRT scheme would have a capacity for 120 people. 60 seated passengers and 60 standing passengers. In my opinion this would not be a comfortable way to travel and would not be enough to entice motorist out of their cars and on to Swords BRT.

- The Swords BRT presentation showed no statistics on projected passenger numbers using the service and there was no Business Plan to back it up its case.

- The proposed articulated buses would be powered by diesel. This is old technology and is not environmentally friendly. It would increase our carbon emissions and footprint. Most cities are now using Hybrid, LNG or Electric Buses.

- These Articulated Buses are quite large and would take up a lot of road space. Our road space is limited. Adding Articulated Buses to an already congested road network would be foolish and short-sighted. In the Centre City alone Buses contribute to major traffic congestion because of the sheer number of them and the fact that there are presently no Buses Stations for parking Buses that are not in service.

Swords / Seatown / Malahide Road

- Removal of the Pedestrian flyover across the Swords Bypass into the Pavilions Shopping and replacing it with a controlled crossing makes no sense. This is very busy junction and would put pedestrians at risk of an accident and cause serious traffic congestion at this point. Pedestrian Crossings should never be located in close proximity to a roundabout as is the current practice in Ireland. Controlled Pedestrian Crossings should be minimised and eliminated by Pedestrian Bridges as BRT is supposed to be a rapid transit system.

Swords / Oldtown / Brides Glen / Castleview

- As part of the planning permission for the Gannon Development "Millers Glen" in Swords, Fingal County Council promised a major upgrade of the local road network to accommodate the large increase in traffic volumes. To date this has not happened. The current BRT (Swords) plan proposes a Terminus close to a proposed "Western Distributor Road" on Gannon Lands. Are these upgrades now going to be funded by the NTA for Gannon and Fingal County Council at some later date for donating this land?

- As I am presently resident in the Castleview Estate, I object to the proposed road widening and loss of green space at the entrance to the Castleview Estate for a Bus lane. The proposed road widening has not been explained to the local residents association nor is it included in Fingal County Council plans for this distributor/link road. This is a residential area; it is not designated as a main road. This will seriously impact the valuation of properties fronting this road and will lead to an increase in road usage and noise pollution.

- I object to the proposed BRT Passenger Stop just beyond the entrance to the Castleview Estate. This will make it more difficult for me to enter and exit my estate, thereby devaluing my property. It is a safety issue.

[redacted]

To whom it may concern

I wish to object to the planned Bus rapid Transit Swords / Airport to City Centre.

For the following reasons:

The widening of the roadway of up to 72 feet wide within the access roads of our housing estates.

The removal of grass verge and existing trees from inside our housing estates.

The narrowing of the road ways within out estates.

The dangers the extra traffic (300 buses per day) possess to the children and family.

The narrowing of the exits to and from our estates and so call introduction of speed ramps entering the estates

The lack of parking provisions at the schools and community centre, even to add extra parking outside the school and community centre for an additional 20 or so cars wouldn't solve the dangers to the children and families and would only drive the school run cars back into our estate and create complete carnage within the estates several time per day

The lack or no provision for park and ride commuters which will result in the parking of commuters in our housing estates for long period of time again dangers to children / family's within these estates.

The noise pollution that will be created within our quite estates also at off peak times.

The cost to the tax payers to create this m type motorway within our estates that will never pay

The break out area for the buses will ultimately become hot spot for underage drinking and drug dealing and also for a start point for joy Ryder's again the dangers to other traffic and ultimately bring our estates down

All round this proposal is not in the best interest of myself my family and my neighbours and does not provide any benefit only a negative constant disruption and noise

This money would be best spent on the metro

On a personal note: I found the BRT Reps aggressive, rude, belittling and obnoxious something I took great exception to these people have no concern for our children or estates only their commission .

--
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[redacted]

From: John Spain
Organisation: John Spain Associates
Address: 50 Upper Mount Street, Dublin 2

Comments:
Dear Sir/Madam,

Attached is a submission in .pdf format on behalf of IPUT plc and Irish Life Assurance plc, owners of Phase 1, Airside Retail Park, Swords Road, Co. Dublin in respect of the proposed Swiftway BRT.

Please note that a hard copy of this submission has also been posted to the offices of the National Transportation Authority.

I would appreciate if you could confirm receipt of this submission at your earliest convenience.

Kind regards,

John Spain

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JSA John Spain Associates
Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

50 Upper Mount Street
Dublin 2

Tel 01 662 5803
Fax 01 676 6374
info@johnspainassociates.com
www.johnspainassociates.com

Swiftway BRT – Swords / Airport to City Centre Proposed Scheme Consultation'
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Date: 26th November 2014

Dear Sir / Madam,

RE: SUBMISSION ON BEHALF OF IPUT PLC AND IRISH LIFE ASSURANCE PLC, OWNERS OF PHASE 1, AIRSIDE RETAIL PARK, SWORDS ROAD, CO. DUBLIN IN RESPECT OF THE PROPOSED SWIFTWAY BRT – SWORDS/AIRPORT TO CITY CENTRE

Introduction

On behalf of our clients, IPUT plc and Irish Life Assurance plc who are owners of Phase 1 Airside Retail Park, Swords Road, County Dublin, we wish to make a submission on the proposals for the Swiftway BRT – Swords / Airport to City Centre proposed scheme.

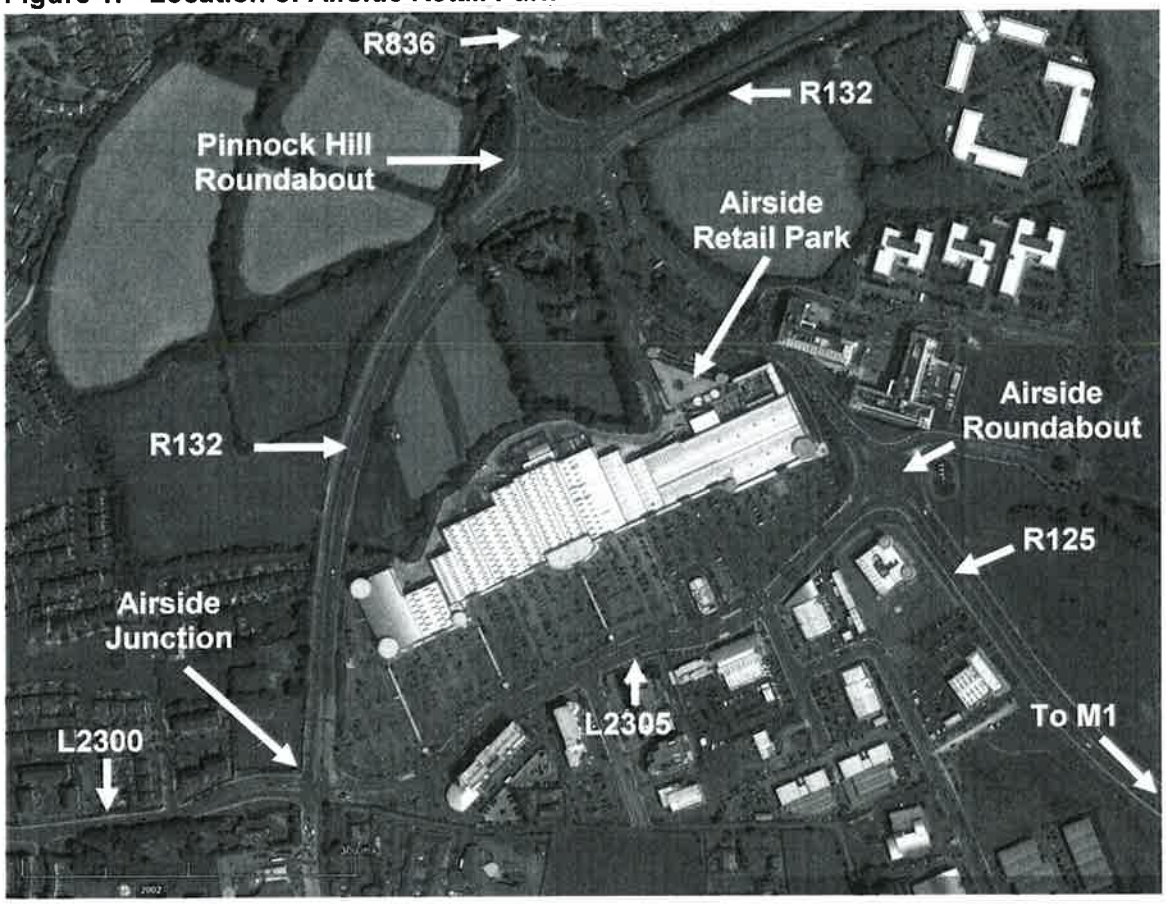
Location of Airside Retail Park

Airside Retail Park is located at Crowcastle, Swords County Dublin. The retail park first opened in 2001 and in 2005 an extension was added to the east of the existing buildings which effectively doubled the original floorspace to its current area of over 33,000 m^2.

It is noted that the preferred route for the Swiftway BRT scheme includes much of the R132 Swords to Dublin Road and includes new BRT stops at Pinnock Hill Roundabout to the north of Airside Retail Park and at the Airside junction directly to the southwest of the Retail Park.

The location of these junctions relative to Airside Retail Park is shown in Figure 1 overleaf which also indicates that the Retail Park is served by the L2305 local road which links the Airside Junction to the Airside Roundabout and in turn to the R125 / M1.

Figure 1: Location of Airside Retail Park



Previous Discussions regarding the Provision of Public Transportation in the Area

At the outset, it is worth noting that our clients have previously consulted extensively with the Railway Procurement Agency during its successful attempts to secure a railway order for the Metro North Light Rail Project.

The Metro North project, as approved by An Bord Pleanala in 2011, included a stop and park and ride facility at Fosterstown to the north of Airside Retail Park. Enabling works and construction works proposed as part of the project was to impact upon the western boundary, car park and access road leading to the rear service area at the Retail Park.

Arising from discussions with the Railway Procurement Agency in relation to this element of the project, our clients secured a number of commitments from the Agency to ensure that the project would not have an undue adverse impact on the operation of the retail park. These commitments specified that:

- the temporary works were not to affect traffic movements to and from the service yard throughout the construction period;
- pedestrian and vehicular access through the Airside Retail Park junction with the R132 was to be maintained during construction; and
- the proposed landscaping along the R132 was to consist of low understorey trees and shrubs similar to the existing landscaping in the area.

Our clients welcomed the open and flexible approach to consultation adopted by the Railway Procurement Agency in relation to the Metro North Project. Based on this previous

experience, they look forward to similar discussions with the National Transportation Authority to ensure that Swiftway BRT Project is delivered in a way which benefits Airside Retail Park and the wider Swords area.

After a brief overview of the main elements proposed under the Swiftway BRT Scheme as they relate to Airside Retail Park, this submission concludes by setting out a number of general observations which merit further detailed discussion with the National Transportation Agency.

Main Elements of the Swiftway BRT Scheme of Relevance to Airside Retail Park

In order to accommodate the Swiftway BRT, it is proposed to make significant changes to the layout and design of the Pinnock Hill Roundabout and the Airside Junctions which form gateways to Airside Retail Park from the north and west.

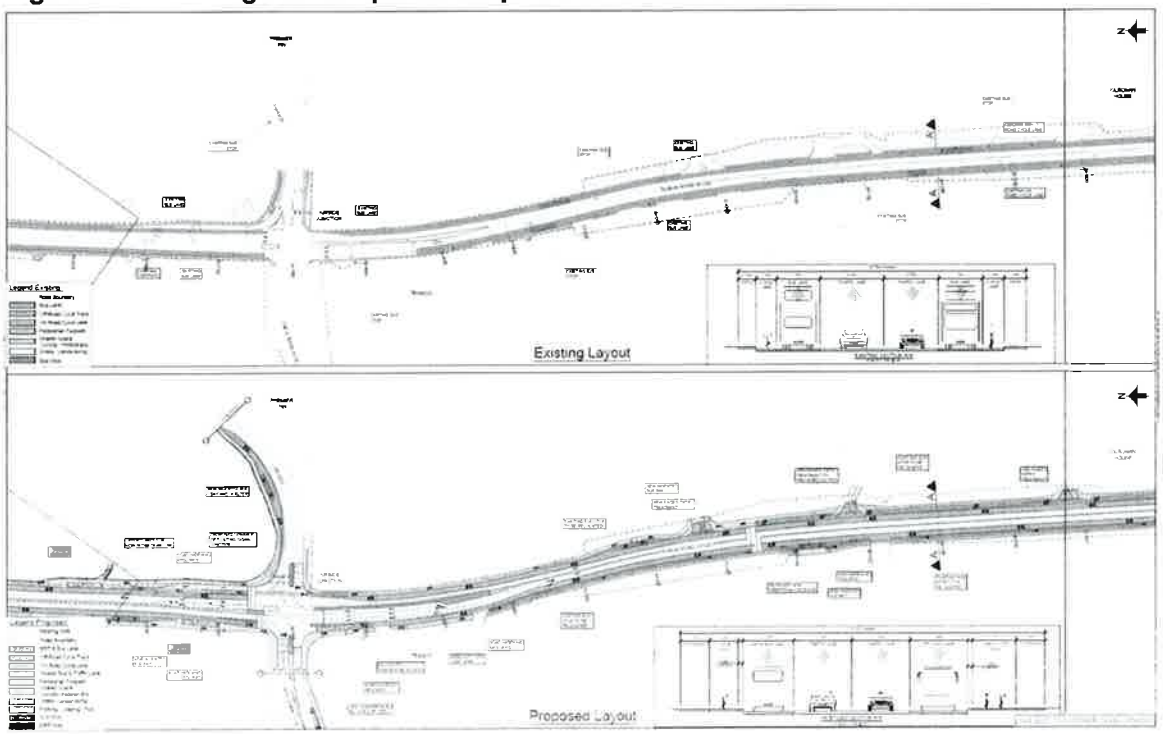
Proposed Changes to Airside Junction

The Airside Junction is a signalised junction which links the R132 Regional Road (Swords to Dublin Road) to the local road network in the form of the L2300 Local Road (Boroimhe Distributor Road) and the L2305 Local Road (Lakeshore Drive).

Figure 2 below, which is an extract from Swiftway Project Drawing BRT-0108 indicates that changes proposed for this junction include:

- an upgrade to the existing signalised junction;
- road widening to facilitate the new Airside BRT stop as well as additional shared space for cyclists / pedestrians;
- opportunities for a new pedestrian link from the proposed BRT stop platform to Airside Retail Park;
- a new indented bus bay and shelter on the northern side of L2305 'Lakeshore Drive'.

Figure 2: Existing and Proposed Map of the Airside Junction



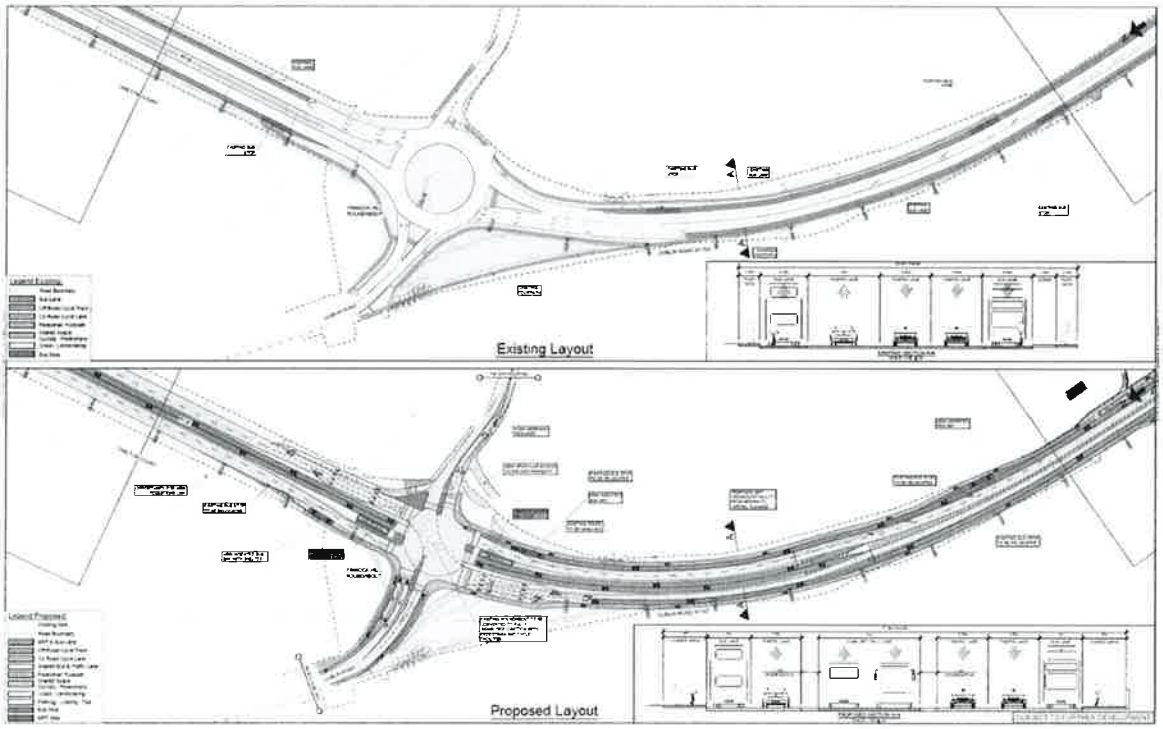
Proposed Changes to Pinnock Hill Roundabout

Pinnock Hill Roundabout a four-armed, non-signalised roundabout connecting the R125, R132 and R836 regional roads thereby providing vehicular access to Airside Retail Park from Swords Town Centre to the north, and Malahide Village to the northeast.

Figure 3 below which is an extract from Swiftway Project Drawing BRT-0107 indicates that the proposed changes to this roundabout include:

- the conversion of the roundabout to a fully signalised junction with pedestrian and cycle facilities;
- road widening of a stretch of L2305 'Lakeshore Drive' to facilitate a new access to an existing private property
- a BRT cross over facility to enable a shift from median to lateral running to the south of the junction itself;
- the relocation of bus stops and the provision of a new Swords South BRT stop; and
- the provision of additional shared space for cyclists / pedestrians;

Figure 3: Existing and Proposed Map of the Pinnock Hill Roundabout



Overall Observations on the Proposed Changes

Our clients have no objection in principle to the upgrades to the existing junctions as well as the provision of the new Airside and South BRT stops.

Our clients would, however, request that prior to the preparation of detailed plans that the National Transportation Authority consult with them directly to discuss the layout and design of these proposals as they relate to Airside Retail Park.

In particular, pedestrian access arrangements to Airside Retail Park from the proposed new stop at the Airside Junction are of critical importance and should be agreed at an early stage to ensure that a satisfactory solution is arrived at.

Furthermore, the potential impact of any road widening proposals at either end of the L2305 Local Road will require further detailed discussion as will the planting and landscaping of areas which will be affected by the upgrade works.

Our clients would also request that due to the potential traffic delays and disruptions arising from construction at the two junctions in question, that any such works will be carefully managed and timed so as not to coincide with critical trading periods for Airside Retail Park such as the months of November and December.

Conclusion

In conclusion, it is respectfully requested that the issues raised be taken into account by the national transportation authority in the evolution of the scheme proposals and our clients, IPUT plc and Irish Life Assurance plc, owners of Phase 1, Airside Retail Park, look forward to more detailed discussion of these issues at some time in the near future.

Yours faithfully,

John Spain Associates

JSA John Spain Associates
Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

50 Upper Mount Street
Dublin 2

Tel 01 662 5803
Fax 01 676 6374
info@johnspainassociates.com
www.johnspainassociates.com

Swiftway BRT – Swords / Airport to City Centre Proposed Scheme Consultation'
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Date: 26th November 2014

Dear Sir / Madam,

RE: SUBMISSION ON BEHALF OF IPUT PLC AND IRISH LIFE ASSURANCE PLC, OWNERS OF PHASE 1, AIRSIDE RETAIL PARK, SWORDS ROAD, CO. DUBLIN IN RESPECT OF THE PROPOSED SWIFTWAY BRT – SWORDS/AIRPORT TO CITY CENTRE

Introduction

On behalf of our clients, IPUT plc and Irish Life Assurance plc who are owners of Phase 1 Airside Retail Park, Swords Road, County Dublin, we wish to make a submission on the proposals for the Swiftway BRT – Swords / Airport to City Centre proposed scheme.

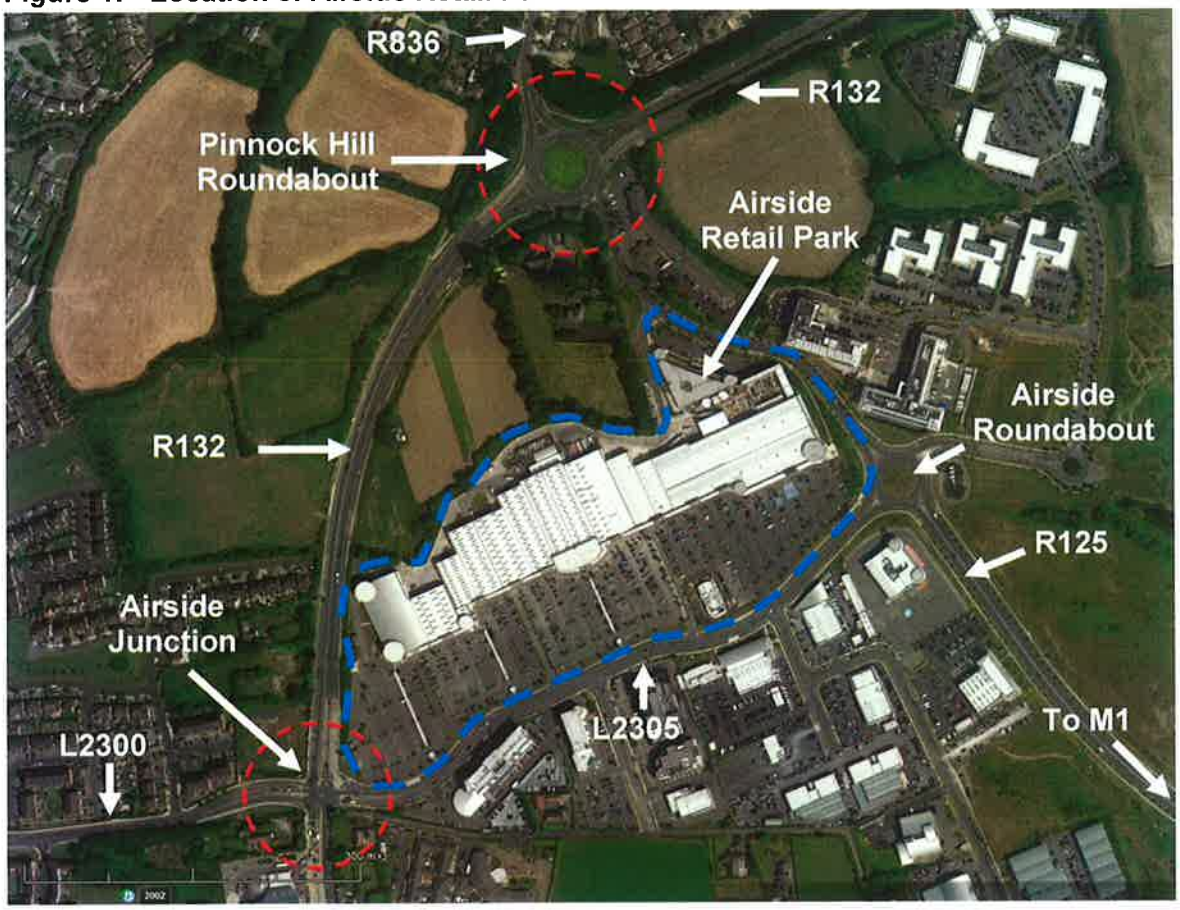
Location of Airside Retail Park

Airside Retail Park is located at Crowcastle, Swords County Dublin. The retail park first opened in 2001 and in 2005 an extension was added to the east of the existing buildings which effectively doubled the original floorspace to its current area of over 33,000 m^2.

It is noted that the preferred route for the Swiftway BRT scheme includes much of the R132 Swords to Dublin Road and includes new BRT stops at Pinnock Hill Roundabout to the north of Airside Retail Park and at the Airside junction directly to the southwest of the Retail Park.

The location of these junctions relative to Airside Retail Park is shown in Figure 1 overleaf which also indicates that the Retail Park is served by the L2305 local road which links the Airside Junction to the Airside Roundabout and in turn to the R125 / M1.

Figure 1: Location of Airside Retail Park



Previous Discussions regarding the Provision of Public Transportation in the Area

At the outset, it is worth noting that our clients have previously consulted extensively with the Railway Procurement Agency during its successful attempts to secure a railway order for the Metro North Light Rail Project.

The Metro North project, as approved by An Bord Pleanala in 2011, included a stop and park and ride facility at Fosterstown to the north of Airside Retail Park. Enabling works and construction works proposed as part of the project was to impact upon the western boundary, car park and access road leading to the rear service area at the Retail Park.

Arising from discussions with the Railway Procurement Agency in relation to this element of the project, our clients secured a number of commitments from the Agency to ensure that the project would not have an undue adverse impact on the operation of the retail park. These commitments specified that:

- the temporary works were not to affect traffic movements to and from the service yard throughout the construction period;
- pedestrian and vehicular access through the Airside Retail Park junction with the R132 was to be maintained during construction; and
- the proposed landscaping along the R132 was to consist of low understorey trees and shrubs similar to the existing landscaping in the area.

Our clients welcomed the open and flexible approach to consultation adopted by the Railway Procurement Agency in relation to the Metro North Project. Based on this previous

experience, they look forward to similar discussions with the National Transportation Authority to ensure that Swiftway BRT Project is delivered in a way which benefits Airside Retail Park and the wider Swords area.

After a brief overview of the main elements proposed under the Swiftway BRT Scheme as they relate to Airside Retail Park, this submission concludes by setting out a number of general observations which merit further detailed discussion with the National Transportation Agency.

Main Elements of the Swiftway BRT Scheme of Relevance to Airside Retail Park

In order to accommodate the Swiftway BRT, it is proposed to make significant changes to the layout and design of the Pinnock Hill Roundabout and the Airside Junctions which form gateways to Airside Retail Park from the north and west.

Proposed Changes to Airside Junction

The Airside Junction is a signalised junction which links the R132 Regional Road (Swords to Dublin Road) to the local road network in the form of the L2300 Local Road (Boroimhe Distributor Road) and the L2305 Local Road (Lakeshore Drive).

Figure 2 below, which is an extract from Swiftway Project Drawing BRT-0108 indicates that changes proposed for this junction include:

- an upgrade to the existing signalised junction;
- road widening to facilitate the new Airside BRT stop as well as additional shared space for cyclists / pedestrians;
- opportunities for a new pedestrian link from the proposed BRT stop platform to Airside Retail Park;
- a new indented bus bay and shelter on the northern side of L2305 'Lakeshore Drive'.

Figure 2: Existing and Proposed Map of the Airside Junction

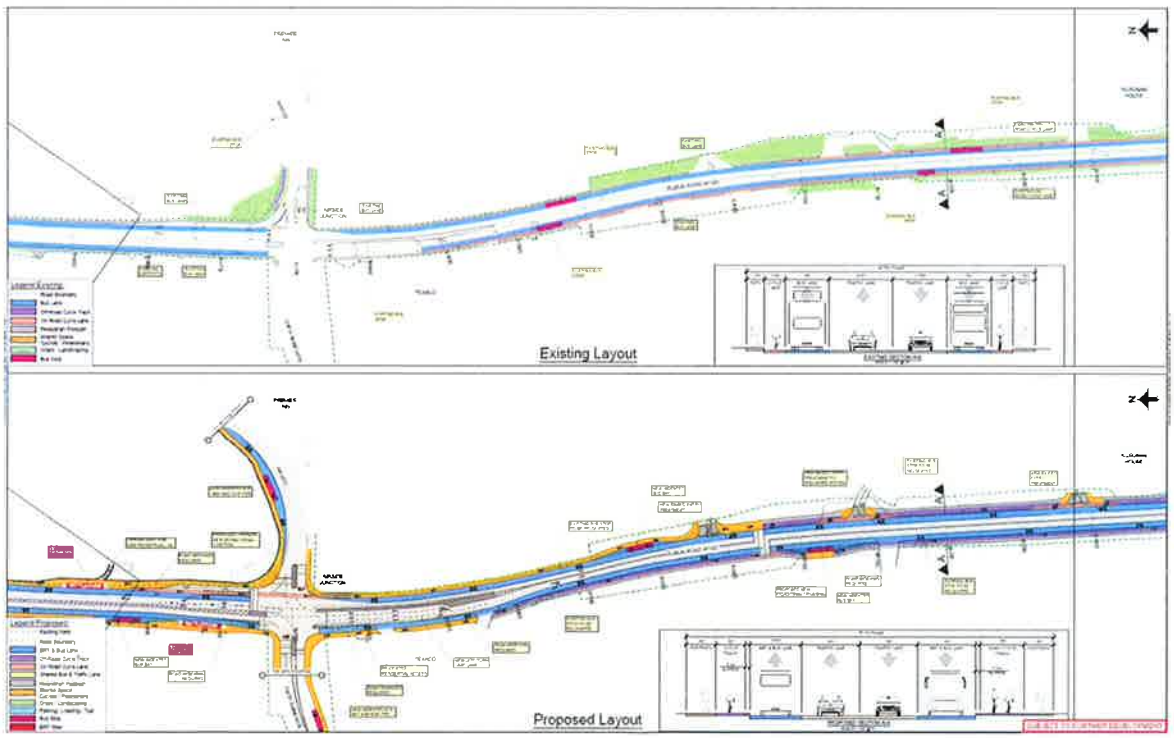


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Figure 3 below which is an extract from Swiftway Project Drawing BRT-0107 indicates that the proposed changes to this roundabout include:

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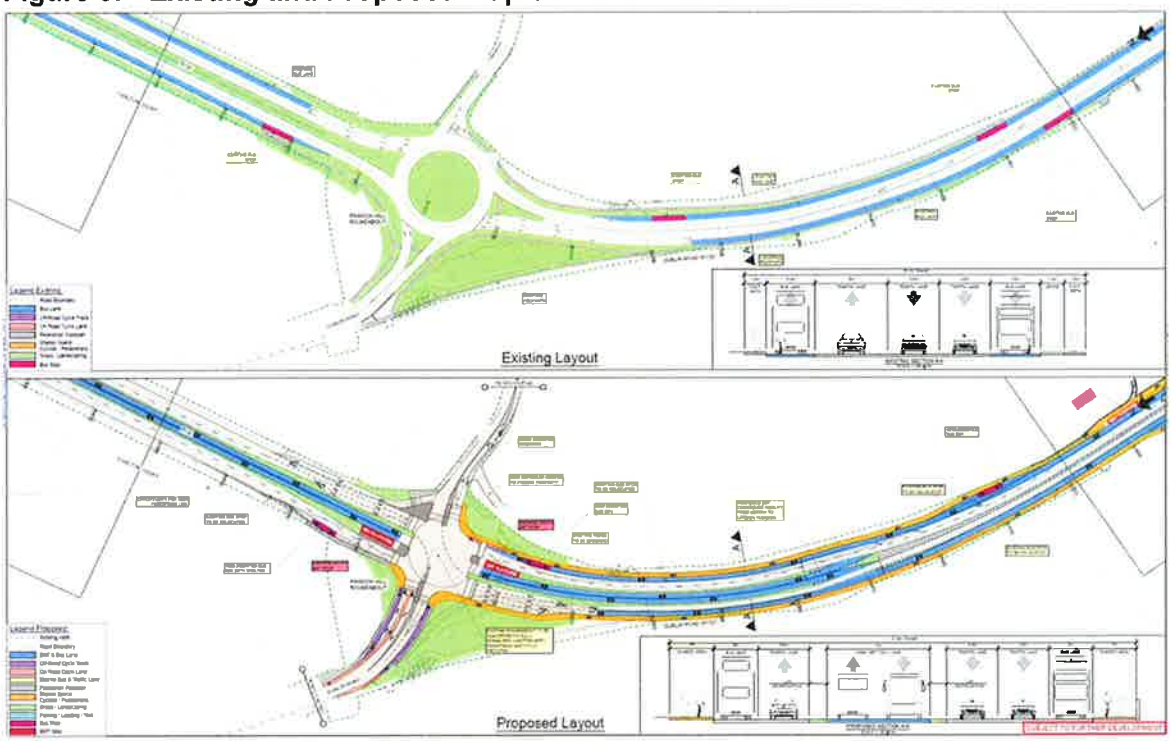
- road widening of a stretch of L2305 'Lakeshore Drive' to facilitate a new access to an existing private property
- a BRT cross over facility to enable a shift from median to lateral running to the south of the junction itself;
- the relocation of bus stops and the provision of a new Swords South BRT stop; and
- the provision of additional shared space for cyclists / pedestrians;

Figure 3: Existing and Proposed Map of the Pinnock Hill Roundabout



Overall Observations on the Proposed Changes

Our clients have no objection in principle to the upgrades to the existing junctions as well as the provision of the new Airside and South BRT stops.

Our clients would, however, request that prior to the preparation of detailed plans that the National Transportation Authority consult with them directly to discuss the layout and design of these proposals as they relate to Airside Retail Park.

In particular, pedestrian access arrangements to Airside Retail Park from the proposed new stop at the Airside Junction are of critical importance and should be agreed at an early stage to ensure that a satisfactory solution is arrived at.

Furthermore, the potential impact of any road widening proposals at either end of the L2305 Local Road will require further detailed discussion as will the planting and landscaping of areas which will be affected by the upgrade works.

Our clients would also request that due to the potential traffic delays and disruptions arising from construction at the two junctions in question, that any such works will be carefully managed and timed so as not to coincide with critical trading periods for Airside Retail Park such as the months of November and December.

Conclusion

In conclusion, it is respectfully requested that the issues raised be taken into account by the national transportation authority in the evolution of the scheme proposals and our clients, IPUT plc and Irish Life Assurance plc, owners of Phase 1, Airside Retail Park, look forward to more detailed discussion of these issues at some time in the near future.

Yours faithfully,

John Spain Associates

[redacted]

Comments:
Sir/Madam,

Firstly I can't understand the need for yet another bus service. At present there is a sufficient number of buses provided by Dublin Bus and the Swords Express to the Applewood area of Swords. There is no need for this service at all.
The Applewood area is already slow to get out of in the morning due to the volume of traffic. This is without the extra traffic which will come from the residents of the newly built Millers Glen. Adding more buses to this is only going toward to this traffic.
The proposed layout for this project means that the road outside my house in Castleview Row will have to be widened thus reducing the already limited green space that my children have to play on. This is completely unacceptable. There is nowhere else for my children to play safely outside our home and it Will NOT be taken on them. This scheme is a waste of taxpayers money. Money which could be used to replace broken paths, speed bumps to slow dangerously fast traffic and more amenities for our children.

I think you should go back to the drawing board and really look at where extra bus services are required. The rivervalley area being the main one.

[redacted]

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[redacted]

From: Mark Feeney
Organisation: Fleet St Car Park Limited
Address: Park rite, 2nd Floor-Block A1, East Point Business Park, Dublin 3.

Comments:
See attached submission from Fleet St Car Park as a response NTA's proposal to provide a Swiftway Service.

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Submission by

ILAC Centre Car Park

To the

National Transport Authority

In relation to

THE PROPOSAL TO PROVIDE A SWIFTWAY SERVICE

Presented by Myles O'Reilly on behalf of the ILAC Centre Car Park
28 November 2014

Introduction

The ILAC Centre is bordered by Jervis Street, Mary Street/Henry Street, Moore Street and Parnell Street. The ILAC Shopping Centre is jointly owned by Chartered Land and Irish Life plc.

The car park has a capacity for 1000 cars and is owned by Dublin City Council.

The car park is operated by Park Rite (Block A1, East Point Business Park, Dublin 3)

Entry to, and exit from, the car park is on the south side of Parnell Street.

Background to Submission

The NTA published plans in early 2014 to introduce a Swiftway service for the route from Swords to St Stephen's Green. On 14 October, 2014 the NTA published its route proposals.

Park Rite has examined these proposals and believes the proposals will damage its car park business as well as other businesses in Parnell Street, Moore Street, Capel Street and the general Henry Street/Mary Street retail area of North Dublin City bounded by O'Connell Street, Parnell Street, Capel Street and the North Quays.

Specifically, Park Rite finds the following difficulties with the proposals:

1. *Cars will be restricted from travelling from Gardiner Street along Parnell Street (east) to cross the top of O'Connell Street by the Parnell monument to get to Parnell Street (west).*

The reason why they will be almost unable to travel through the junction is because the Cavendish Row/Parnell Street/O'Connell Street junction will be dominated by:

- The Luas Cross City service (LCC) which will have two tracks crossing through the junction with traffic light priority (TLP)
- The Swiftway buses – traveling north and south-will cross through the junction and also have TLP
- Other buses, taxis and coaches–travelling north and south- will cross through.

It will not, therefore, be practicable for cars to get through this junction. This seems to be part of a policy of discouraging car drivers from accessing the area.

This car park is already experiencing a decline in customer numbers caused by the Luas Cross City works which are causing delays and traffic congestion. The decline in numbers demonstrates how sensitive customers are to changes to traffic management measures.

2. *Cars will be prohibited from travelling down North Frederick Street/Parnell Sq. East/Cavendish Row to Parnell Street*

This source of customers for the Parnell Street area will be ended.

3. *Cars will be prohibited from entering Gardiner Street from Dorset Street*

Cars will be diverted to Belvedere Road and will need several turns to get into Parnell Street. They will then be unable to get through to Parnell Street west.

4. Cars will not be able to travel up O'Connell Street and turn left on to Parnell Street (west)

The maps provided by the NTA for Swiftway show that, effectively, no cars are being allowed to travel up O'Connell Street except for access to the car park in Prince's Street. It is very difficult for Park Rite to make a full assessment of the difficulties that will be faced by the ILAC Centre car park in the absence of the Traffic Management Plan.

Importance of Gardiner Street traffic

Gardiner Street is an access route to Parnell Street for traffic from the South of Dublin.

It is also used by Northern traffic (M1-Dublin Airport, Swords, Meath, and Belfast etc.)

Importance of Parnell Street (west)

The street is now an important retail and leisure area in the north of the city. In addition, Moore Street, Henry Street, Mary Street and Capel Street depend on Parnell Street traffic for car-user customers.

The North City retailers compete with suburban shopping centres such as the Pavilion in Swords, Santry, Blanchardstown, and Liffey Valley etc.

Damage to Parnell Street Area and to ILAC Centre car park

The Swiftway proposals for the bus to travel through the centre of Dublin City and, in particular, for it to travel down O'Connell Street will severely damage the city and in particular the Parnell Street area. Consequently, the ILAC centre car park will, inevitably, suffer a decline in customer numbers.

Park Rite calls upon the NTA not to proceed with Swiftway or if it does so, to remove it from O'Connell Street corridor.

Conclusions

1. The ILAC Centre car park will be gravely affected if the Route Proposals for Swiftway are implemented.
2. It is essential that the Traffic Management Plan be published as soon as possible.
3. Park Rite would like to meet the National Transport Authority to difficulties that will arise.

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Block A1,
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Dublin 3,
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F +353 1 542 5601
E info@parkrite.com
www.parkrite.ie

National Transport Authority

Dun Scéine

Harcourt Lane

Dublin 2.

27th November 2014

RE: Public consultation submission from Fleet St. car park.

Dear sir/madam,

Please find enclosed a public consultation submission on behalf of Fleet Street multi-storey car park regarding the proposed Swords/Airport to City Centre Swiftway BRT scheme.

Yours sincerely,

Mark Feeney
General Manager Car Park Operations

[redacted]

Comments:
I object to this swiftway. I live on the lawns and I do not want to hear /see a bus at 5am outside my house. I have two young kids and we do not have a front garden and to lose some of the grass verge we have for our kids to play is a travesty . All the green area should stay what green area we have is small enough and I do not want it to be removed . We put up with the development of millers glen the traffic the noise and we do not want this bus near out estate . I don't understand why you need another bus there is plenty of bus routes in this area. Go back
To the original plans for the metro and leave our estates alone.

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Comments:
To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

• The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

• Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

• Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

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Comments:
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[redacted]

To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. As a local parent with schoolgoing children the reasons for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

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The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

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I look forward to the outcome of the consultation process.

[redacted]

[redacted]

Comments:
This service is not needed in swords as it won't serve the majority of estates that are without public transport. The only viable public transport option we have is the Swords Express as Dublin Bus provide a shockingly poor service to Holywell! This new service will disrupt the swords express route and therefore effect us adversely. We would have no public transport option again. Swords express were the only company interested in serving Holywell. Dublin bus have zero interest and have done for the 8 years we Harv lived here. The metro inert his what is needed sand this has been scrapped, which is a disgrace. Why you don't give the m money you are going to spend on this and invest in swords express to allow them to improve their service further. I am strongly against this plan and I hope the swords express do not get adversely affected by their popularity and your plans. Please do not go sheds with this shambles.

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[redacted]

Comments:
completely against this proposal it is a waste of taxpayers money will cause unneccessary delays to swords residents during the consconstructioniod and we already have a perfectly efficient and comfortable private bus service from Swords to town . if they are putting anything in it should be a tram or metro from the airport to the city but don't bring it out to swords village not wanted or needed again waste of money

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[redacted]

Comments:
hello
I would like object to the swords part of Swiftway on the grounds of
1: Swords is already well served by the current Dublin Bus Services (33,41,43).
2: the possibility of the Metro line being built in the future would make the swiftway
a waste of Money

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[redacted]

Comments:
Please find attached a letter of objection in relation to the proposed Swifway bus.

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To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Removal of Green space at Sandford Wood

The location of this stop as outlined in the plan will reduce this much green area for local residents especially children.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

Comments:
Please find attached a letter of objection in relation to the swiftway bus

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I look forward to the outcome of the consultation process.

'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

[redacted]

Don té lena mbaineann sé

Is mian liom/linn ábhair bhuartha a ardú maidir leis an mbealach atá beartaithe don scéim nua bus sciopaidh idir Sord/Aerfort agus Lár na Cathrach.

Tá mo pháiste/í/ ár bpáiste/í ag freastail ar Ghaelscoil Bhrian Bóroimhe atá ar an mbealach atá beartaithe don scéim Nua.

Tá mé/muid buartha faoi na nithe seo a leanas:

1. Is gá do thuismitheoirí áirithe a bpáistí a thiomáint ar scoil. Má leanann an sceim ar aghaidh mar atá beartaithe, ní bheidh aon pháirceáil idir an stop ag Coill na nÚll agus an stop ag Seanbhaile. Cruthóidh sé seo neart fadhbanna do thuismitheoirí a bheidh ag iarraidh a bpáistí a thiomáint ar scoil in am agus bainfidh sé an rogha sin uathu.

2. Beidh brú ar thuismitheoirí a gcaranna a pháirceáil sna heastáit ata cóngarach don scoil (Geata Bhunbaire, Radharc an Chaisleáin agus Gleann an Mhuilleora) agus cuirfidh sé sin brú ar na heastáit chéanna

3. Caithfear bheith airdeallach ar shábháilteacht na gcoisithe agus an bealach nua á dhearadh. Níl ach dhá thrasnú beartaithe taobh na scoile agus is gá go mbeadh níos mó ann chun cur le sábháilteacht na bpáistí a shiúlann ar scoil.

4. Beidh níos mó trácht ar an mbóthar, go háirithe ar maidin agus tuismitheoirí ag iarraidh a bpáistí a sheoladh ar scoil agus cruthóidh an trácht bhreise seo contúirt sa bhreis do leanaí.

I/We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

My/Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

I/We have a number of concerns regarding this route:

1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

Le meas/*Yours sincerely,*

_____

Is féidir an litir a úslódáil ag an nasc seo a leanas/*Upload this file to NTA Website at the following link*:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

An dáta is deireannaí i gcomhair aighneactaí ná 28-11-14/*Closing date for submissions is Friday 28th November at 5pm*

[redacted]

Comments:
To whom it concerns:
I believe the BRT proposal is completely unsuitable as a means of bringing quality transport to North Dublin, Dublin Airport and Swords in particular. Below points cover a non exhaustive list of reasons not to proceed with this project.

1. school car parking spaces will be removed in the area of Applewood, with no alternative proposed
2. BRT to pass through a school route every 4 minutes, in each direction; one BRT every 2 minutes, in addition to existing high school run traffic.
3. Removal of trees along approx. 1km of Glen Ellan Grove – completely against any environmental goals we should have in this country
4. Removal of the skate park, a facility which took many years and a substantial amount of tax payers money to establish in the first place
5. Removal of a large portion of Glen Ellan Park green. Reduced play area for local children
6. Likely chaos from Glen Ellan, Sandford Wood, Bride's Glen and Applewood at peak traffic times due to major road works, road widening, bus stops along Glen Ellan Road
7. Pedestrian dangers due to removal of overpass bridges and the need to cross to the central median to reach the BRT along a long stretch of the Swords bypass
8. Increased traffic delays due to the aforementioned BRT running through the central median, which will require other traffic to stop to allow buses to pass across the existing lanes
9. Pedestrianizing JugBack Lane will again increase traffic volumes on Glen Ellan Road
10. At an estimated €200 – €250m, this would be better spent on a metro/rail system running directly from Swords to Dublin Airport and onwards to Santry, Whitehall, Dorset Street into Dublin City
11. The estimated 2 – 3 years construction time is farcical; residents already have a bus system which can match the proposed travel times closely enough to negate the cost, disruption, increased travel times, increased pedestrian dangers and reduced local amenities which would be required to implement this short term, high cost, politically driven alternative.

[redacted]

From: Bob Laird
Organisation: Laird Aviation and Transport Consulting
[redacted]

Comments:
Please replace submission made on 25th November with this submission. The final version of the document had not been saved when sent yesterday, so it is possible that the document sent was not the final version.

Apologies for this inconvenience.

Bob Laird

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SUBMISSION ON SWORDS BRT CONSULTATION - [redacted]

Bob Laird

Summary:

An analysis of the detailed route design shows that great effort has been made to give a clear uninterrupted route for the BRT. This involves road widening in many places and use of layby bus stops for other buses so that they do not impede progress of BRT vehicles. In most locations care has been taken to ensure that left turning traffic does not block the path of the BRT vehicles. However, there are a number of significant issues to be discussed, including BRT priority compared to Luas, and types of vehicles to be used.

- Good route from Swords to city centre. More work needed on some junctions and bus stops. Some of city centre plans are not ideal and could cause delay and unreliability of BRT, as well as insufficient space for other buses.
- Overall northbound route and stops for Luas, BRT and other bus in Westmoreland St. and O'Connell St. needs to be reviewed. All public transport needs to be considered together, with priority based on expected passenger traffic, even if this means revising the Luas plan.
- Plan needs to take account of impact on other bus routes to ensure that service and stop locations for other parts of the city (e.g. Finglas, Ballymun, also southside) are not sacrificed.
- There is no discussion on vehicle type. This needs to be debated and pros and cons of each type outlined. Artic single deckers with high standee capacity not suitable for long journeys such as Swords.
- The plan needs to focus not only on construction, but also on how a quality service will be delivered. This will include traffic management and culture, as well as operator contracts and performance.

Selection of vehicle type:

The document reads as if articulated single deck buses are the only bus suitable for this service, without any analysis or justification for this. There are a number of factors to be taken into account, and an informed discussion is required.

Articulated single deckers with multiple doors would be closest to the Luas product, and this clearly works well for Luas. It is an "honour" fares system, rather than having to show tickets to a driver or conductor. It is the customers rather than driver who decide when the vehicle is full, based on crush capacity. It is ideal for fast boarding and alighting, and very valuable where both are happening in significant numbers at the one stop. Artics are also the most common bus types on BRT systems in Continental Europe and elsewhere.

Swords BRT is catering for essentially a commuter market. The demand analysis shows that most boardings inbound in the morning are in Swords, so with capacity planned to match peak demand, the buses will be very full out of Swords. Similarly, outbound morning peak buses to Airport are full most of the way, with alighting being

in Airport. The demand analysis boarding and alighting at intermediate points is surprisingly low.

An analysis of Figure 10.6, peak hour demand in the morning to city suggests that, with 15 buses per hour, the average load per bus will be 100. But it also suggests that average load out of Swords will be 80. Expected seating capacity is of the order of 50, so that implies 30 (or 37%) of peak passengers boarding at Swords would be standing. It is likely that passengers boarding at Swords North would have to stand. A similar situation in reverse would apply in the evening peak.

The other factor to consider is the turnover of passengers. The advantage of multiple doors and single deck is in dwell time reduction when there are a lot of people alighting and boarding at the same time. The expected average boarding and alighting per bus at the most significant stops are shown below. These are derived from Figure 10.6:

	on	off
Santry north	10	12
Santry South	8	2
Collins Ave.	13	8
St. Patrick's College	12	6
Drumcondra	13	10

These are not very significant figures, and this suggests that the benefit of single deck artic buses would be quite small on this route.

A similar analysis on a route such as, for example, Whitehall to Terenure, might give a different answer, as

- the numbers boarding and alighting at each stop would be greater
- the average passenger journey would be shorter.

Such a route would be more like most of the systems abroad which use artics.

There is a strong customer resistance to standing. Tolerance of standing is higher when journey is short, or when the time saved is so great that standing is still better than the alternatives. There is also a higher acceptance of standing for longer distances on rail modes, due to higher comfort level. Articulated buses in particular have a poor ride quality in the rear section as there is only one axle, and standing here for long periods would be particularly uncomfortable. The tolerable standing time on a BRT is probably about 15 to 20 mins, no more.

A previous effort called "CitySwift" on the Blanchardstown route in 1993 failed on precisely this point. The concept was high capacity standee single deckers, with high frequency service. But customers were refusing to get on buses with no seating available, opting instead to wait for the next bus. These buses were replaced by double deckers within three years.

"Bendi-buses" were introduced in London in large quantities in the middle of the last decade. They were all withdrawn within a few years and, in fact, they became a high profile political issue in the London Mayor elections. There are very few articulated

buses now in use in UK. These buses are more successful in Continental European cities that have two characteristics:
- higher population density, so journey distances are short. For example, at the recent BRT Conference (CILT/IEI) the Barcelona speaker stated that average BRT journey length was 3 km.
- almost universal use of period tickets, so there is no marginal cost of an additional journey, and therefore people are more inclined to use buses for very short journeys.

It would be a serious error to assume that articulated single deckers are the most appropriate for a long route like Swords without detailed analysis and an opportunity for commentary. Analysis should include:
- average passenger journey length (the shorter the more suitable "bendis" are: for longer a high seat ratio is needed)
- turnover of passengers per journey (ratio all boardings to peak load)
- typical boarding and alighting at busy stops (these look low at most intermediate points)
- boarding and alighting times for various forms of bus (single deck, double deck, number of doors, one or two staircases)
- seating/total capacity ratio and what it means in practice for percentage of passengers standing, and for length of journey standing.

Also to be taken into account is what people are used to. If used to getting a seat on a 41, a 41x or Swords Express, am I going to switch to BRT and stand?

Among the options would be the Wright's London style "New Routemaster", a double decker with multiple doors and stairs. This combines the benefit of high seating ratio with faster boarding and alighting using an "honour" system. A double decker would also take up less space at stops and at layover termini, with some practical benefit. It would need more vehicles per hour at peak to carry the expected demand.

The ideal vehicle would have 80 seats, multiple boarding and room for about 40 standees as well.

If articulated buses are used as planned, then the outcome will be one of the following:

1. demand will not reach expected levels, as boardings in Swords will be much lower due standing not being acceptable
2. more vehicles will be required to and from Swords at peak
3. demand from Swords will be less than expected, but offset by higher demand in Santry/Whitehall/Drumcondra.

The main point is that NTA is stating that type of bus has been decided, and no justification or analytical details has been provided to back up that decision. We need an analysis and debate on this issue to determine the optimum vehicle for this particular market.

Route and traffic management

There are a number of comments on the route and its ability to provide an uninterrupted path to the same level as that of Luas:

1. central median is used on Swords bypass, but lateral lanes for the rest of the route. It is a pity that central lanes are not used more. There are a multiple of reasons why lateral lanes are at risk of being blocked by other traffic, which would not arise with central lanes. It will be an operational challenge to get a culture and enforcement to ensure that BRT gets the same respect as Luas for not having its passage blocked either by deliveries, taxis loading or left turning traffic. It would be easier to overcome these with central BRT lanes.
2. there are a number of locations between city centre and Whitehall in both directions where regular bus stops seem to block BRT. Clarity is needed on how this will be managed.
3. there is significant sharing of road space with general traffic between North Frederick St. and southside terminus. Some of these are likely to cause significant delay to BRT vehicles, which defeats the objective of consistent and reliable journey times, and which will add to operating costs. The greatest risk of delay arises at Merrion St. Upper/Merrion Row junction southbound and North Frederick St. northbound.
4. It is a pity that two-way running at Merrion St. Lower is not provided. I understand that space is an issue. The turns into and out of Clare St. and Lincoln Place are sharp, will cause delay, and no stop is provided here, so no need to serve them.
5. Stop in Lombard St. would be better in Westland Row at station in order to provide connection from rail. One of the key advantages of the route chosen should be to give connection between Leeson St./Earlsfort Terrace area and DART/ Suburban Rail at Pearse.
6. The road space and stopping places for Luas, BRT and other buses both northbound and southbound in O'Connell St., Westmoreland St. and D'Olier St. need to be considered as one combined plan, taking into account all public transport needs. This is developed below in a separate comment.
7. The reduction in lanes for general traffic in certain locations (notably the length of Dorset St. to Drumcondra Station) is noted. This is a necessary change and is supported.
8. Left turn at some junctions is a constraint on the effectiveness of many buslanes. The worst example on the Swords corridor is inbound left turn to Collins Ave., as traffic backing up on Collins Ave. extends into Swords Rd. and backlogs on the buslane as far as Whitehall Church. The additional lane planned will help, but if traffic backs up past the extent of the new lane, it needs to be in the general traffic lane rather than BRT lane. This will require driver education and enforcement.

Other issues that are as important as the route design include the culture that is established for other road users (general car traffic, taxis, deliveries, cyclists and pedestrians) and the operational culture and management. BRT will not work unless these are established with the same acceptance as with Luas.

Route Operational:

1. How will traffic light priority work with other vehicles using the BRT lane? Will BRT trigger light priority if there are other buses in front of it?
2. Will taxis be allowed use BRT lane? Note that taxi volume from Airport on Swords buslane is very high. Taxis using BRT lane could delay BRT progress, but not allowing them would severely congest the general traffic lane and make taxi journey times longer.
3. The general bus stops are designed to cater for one bus, but there will be many occasions when two or more buses will arrive at the one time.
4. Need to inculcate from the very beginning that right of way has to be the same as with Luas. BRT vehicles need to use same loud horn, for example, against all transgressors.
5. It is totally impractical to have cyclists sharing BRT corridor at any location. Cycle speeds are too slow, there is a growing number of cyclists, so impact on BRT progress could be quite significant. In a typical situation, with one BRT lane and one other lane, which is congested, there would be no scope for BRT to pass out a cyclist. BRT must be considered the same as Luas in regards to cyclists, a totally no go area. This must apply in city centre area as much as in the suburbs.

Detailed issues related to bus stops etc.

Care needs to be taken not to increase the walking distance for those using regular bus services. There are some cases where the plans require too long a walk, and these should be changed to limit the impact. For example:

- Inbound at Cloghran Roundabout Stop 3699 - move south to Coachman's rather than north for convenience for users
- Stop 3671 northbound at Airport Roundabout - need to keep this stop. Essential for boarding as is first stop served by both buses from Airport and those not serving Airport. Also as there are two general traffic lanes and low volume, there would be no difficulty with a BRT passing out a regular bus here.
- Stop 3670 at Kealy's (northbound at Airport) is also needed for regular buses. This is a popular boarding stop with airport workers and passengers, especially from Terminal 2. This is shown as BRT only.
- Bus stop 15 at junction Dorset St./ NCR northbound is a very popular stop, taking feed from NCR both sides also Mater Hospital. This should be kept at existing location, not moved north of Innisfallen Parade. With a reduction in traffic lanes planned, it should be possible to retain a stop here without interfering with BRT.

On a positive note, there is a good BRT/Orbital bus (17a) exchange at Coolock Lane. It would be helpful to have stops close to this location in both directions for regular buses serving Santry Village.

Note that bus stops are not identified on O'Connell St./O'Connell Bridge.

Service operational:

1. Given the high frequency, and the fact that there will be some variability in journey time, some dwell time has to be allowed for in city centre. Otherwise there will be bunching and long gaps in service before the northbound journeys even start. No matter how well the route is designed and managed, a journey time variability of at least 5 minutes must be planned for. So layover space, to accommodate at least three buses, is required at Earlsfort Terrace/Hatch St.
2. Unlike Luas and DART, these buses will not pass their depot while in service. A plan for getting vehicles and drivers to and from the operating route needs to be in place to ensure that it supports cost effectiveness and service reliability.
3. Key to customer confidence is that the service is delivered to a high standard of reliability and journey time consistency. Appropriate incentives, management practices and organisation culture need to be in place to ensure delivery of service and customer confidence at the same level that has been achieved by Luas.

Other bus services on corridor:

Due to the size of Swords and the limited penetration of housing areas by BRT, there will still be a need for a considerable number of other bus services in Swords. The frequency and reliability of BRT (more so than speed) will make more people gravitate towards it, but there will be many who will find the distance too far. Change of mode is not popular, and it would be wise to assume that people who need a regular bus to access their home/place of employment will want to use it for their full trip, rather than changing to BRT.

There will also be both CIE Group and private sector services sharing some or all of the corridor. These will include Matthews from Drogheda/Laytown (currently 4 per hour at peak); Bus Eireann 101 from Drogheda/Balbriggan (3ph); Dublin Bus 33 from Skerries/Rush/Lusk (2ph); Aircoach 700 Airport to Leopardstown via City Centre (4ph). It is not practical to either divert any of these routes, or to curtail them with a transfer to BRT. Any suggestion of doing this would have negative customer reaction. Note that Matthews and Aircoach use a very limited number of stops, while BE 101 does not carry local traffic within the BRT area. Dublin Bus 33 acts as a local service within the BRT area, but perhaps that could be reviewed. A service with no local traffic similar to BE 101 might be appropriate. So this is 13 buses per hour in addition to BRT, and this before we get the city services joining at Whitehall.

Other bus services will join the corridor, especially in the Whitehall/Drumcondra area. These will come from Santry, Beaumont, Ballymun and Glasnevin. There should be benefit to speed and reliability of these services due additional priority of BRT, but they will not be as fast as BRT due longer stop dwell times and lack of traffic signal priority.

The corridor is also joined by buses from Finglas and Cabra in the Dorset St. area. At this stage, it is quite crowded, and careful attention will be needed to avoid delay to BRT.

BRT, Luas and regular bus in the city centre area:

First point to establish is - will there be as many regular buses in city centre as there are now? With both Luas Cross-City and Swords BRT, there will be a reduction in regular buses northside, but very little impact southside. This will create issues of service reorganisation, breaking of traditional cross-city linkages, termini for southside routes that do not need a northside leg.
Luas will not have much impact on the bus network. The route mostly affected will be 120, which currently terminates in Parnell St. and does not penetrate the city centre. There may be a reduction in demand for northern leg of route 46a.
BRT should effectively replace route 16 northside. Swords buses currently use O'Connell St. southbound, but not northbound. Other routes feeding into the corridor (44, 1, 13 and 11) will have some rationalisation, but essentially at least three of these cross-city routes will survive. Other cross-city routes to Finglas, Glasnevin, Marino, Cabra and beyond (4, 9, 38, 40, 122, 123, 140) should be largely unaffected, as will radial route 40d. So Luas is likely to have little impact on regular buses through the city centre, while BRT will impact some northside buses, while the southside legs will still be needed. Present number of cross-city routes on this corridor is 13 and could reduce to 11. Peak frequency of 70 buses per hour (O'Connell St. northbound) could reduce to about 56 per hour.

North Frederick St. southbound - currently bus speed here is very slow, due high volume of buses in single lane and multiphase lights at Gardiner Row. Needs to be addressed if BRT is to achieve satisfactory progress.

Parnell Square southbound - may be congested, especially as street is narrower to accommodate northbound BRT. Many buses on regular Dublin Bus routes will have longer than normal dwell time due driver handover. This is unavoidable. See separate comments on driver handover.

O'Connell St. southbound - Why no BRT stop in Lower O'Connell St. to connect with Luas Red Line? Also note existing bus stops in Upper and Lower O'Connell St. are not shown. Bus stops in O'Connell St. are critical. The opportunity of BRT should be used to increase the number of bus stops in Lower O'Connell St. to facilitate convenient locations for access to shopping etc., also connection with Luas Red Line.

D'Olier St. southbound - good idea to separate BRT from other buses, and to install a central bus stop island. However, the volume of buses that require to either traverse or stop in D'Olier St. is very high, and will not change significantly due to either Luas CrossCity or BRT as neither is serving any new southside locations. There may be a considerable reduction in D'Olier St. buses when other BRT lines are built, but not untill then. Note also the loss of College St. and Lower Grafton St. stops due Luas, which puts even more pressure on D'Olier St. for both boarding and alighting of cross-city bus routes. It helps that some regular buses can use the BRT lane, but where will they stop to pick up and set down? The one lane to the right of regular bus island stops will not be sufficient for the volume of buses that use this street. The intent to use multiple buses at one stop at a time is a good one, this will help.

Westmoreland St. and O'Connell St. northbound

The northbound situation is more complicated due to sharing the street with Luas. Good to see Luas lanes are earmarked as "Luas and BRT". This makes more efficient use of what would otherwise be very under-utilised road space. However, the benefit is limited seeing as there are so many Luas stops, and the stops are not shared, i.e. BRT using Luas line would only be on very short stretches. The single lane allocated to the estimated 56 other buses per hour is totally inadequate. Currently, both northbound lanes in O'Connell St. are used by high volumes of buses. All buses need to be able to share the Luas line.

A comparison of expected demand for Luas CrossCity and Swords BRT shows that BRT will have 30% to 60% more passengers than Luas, both northbound and southbound, in O'Connell St. in morning peak. It also shows that BRT boardings and alightings in O'Connell St. will be up to 2.5 times those of Luas CrossCity. Luas, on the other hand, will have more loadings and boardings at Westmoreland St./Trinity. Taking the broader picture, peak loading on BRT in both directions (Drumcondra) will be 40% to 50% more than peak loading on Luas CrossCity on the northside (even with DIT Grangegorman in place). These are rough figures interpreted from the loading, boarding and alighting demand forecast graphs in NTA documents (Luas CrossCity Business Case; BRT Swords Route Options Assessment Report).

COMPARISON OF LUAS BROOMBRIDGE AND BRT SWORDS

	Luas Broombridge	Luas Broombridge	BRT Swords	BRT Swords	Ratio BRT/Luas
Annual passengers (m)		10.5		24.6	234%
Morning peak data					
Loading northbound	Upper O'Connell St.	1800	Rotunda	2300	128%
Peak loading northbound	Grangegorman	1800	Drumcondra	2500	139%
Boardings northbound city centre		600		1400	233%
Loading southbound	Parnell St.	1300	Rotunda	2050	158%
Peak loading southbound	Grangegorman	1500	Drumcondra	2300	153%
Alighting southbound city centre		550		1400	255%
Unit costs					
Capital cost €M		368		265	72%
Distance km		5.6		23.1	413%
Cost/km €M		65.7		11.5	17%
Capital cost per annual passengers		€35.0		€10.8	31%

Loading is everyone on board at that point. Boarding is those getting on at a stop
Data from Luas Business Case and BRT Route Options Assessment Report
Data may not be exactly comparable due different years (both demand and cost)
City Centre is the overlap area between Rotunda and Trinity College

This is a critical issue, and it begs the question of how our scarce city centre street infrastructure is being used optimally to provide mobility for the citizens of Dublin, and to maximise the economic and social benefits that derive from public transport. It is clear that the road space priority being given to Luas CrossCity is wholly inefficient, which is having a negative impact on the street space available for transport to other parts of the city, and therefore on the mobility and economic benefits that can be derived.

For example, in dismissing Marlboro St. as a possible southbound BRT route, the report states:
"Luas CrossCity will be the priority service on this street and Swiftway would therefore have to operate on secondary priority". Given that Swiftway will be carrying significantly more passenger both into and through this area, why should Luas be the priority service? Are we serious about investment in public transport to facilitate mobility for as many people as possible, or are we prioritising one mode over another for other reasons?

So why do we have a stop in Lower O'Connell St. for Luas, yet none for BRT or for the other 11 bus routes? Given that BRT on its own has more passengers in O'Connell St. than Luas, surely it can deliver more connecting passengers to Luas Red Line? Also the other 11 bus routes can deliver connections to Luas Red Line.

Parnell Square northbound
It is not practical to route all regular buses through Parnell Square East and North Frederick St. for a number of reasons:

- capacity at the Frederick St./ Dorset St. junction would be inadequate. Currently buses use two lanes exiting Granby Row, and this is necessary to cope with the volume of buses here
- many of the routes continue up Western Way, and it would be a difficult manoeuvre to get them back on track
- long dwell times at Parnell Square due driver handover requires additional space, which is available on Parnell Square West.

It should be a working assumption that, for these reasons, all buses other than BRT will continue to use Parnell Sq West. This gives BRT a better flow on both Parnell Square and North Frederick St. As BRT will only need one lane, it also gives more space for southbound traffic on Parnell Sq., which would otherwise be quite restricted.

Driver handover
The driver handover issue is worth some comment. Luas and DART have the luxury that all operating lines pass depots, and driver change can easily be done there. This is not the case with the vast majority of Dublin Bus routes. With one meal break on a typical working day, each bus needs a driver change on average every 3.5 hours. Some decades ago, with cross-city routes taking 40 - 45 minutes for a single journey, that meant 20% of journeys required driver change. Now some cross-city routes are up to two hours long, so driver change is needed on about 50% of trips.

There is no practical or cost effective alternative to having driver change at city centre on most routes. Any other arrangement would be costly in terms of drivers needed for

the same schedule and/or buses needed for the same schedule. Other arrangements would reduce flexibility and probably incur larger overhead costs.

Driver change is normally quick, taking about one minute, but it is longer than a normal bus stop dwell time. There will be times, inevitably, that it takes longer. With journey time variability, at times buses arrive at Parnell Sq earlier than expected, and taking up driver may not be there. With RTPI, this can be overcome, but it requires driver flexibility and goodwill. Overall impression is that long dwell times are far less frequent than in the past, but some allowance needs to be made, and this requires some additional bus stop space.

Proposal is that, given the above issues, only BRT routes northbound via Parnell Sq East and Nth Frederick St., with all other buses using Parnell Sq West. Arrangements for Luas on Parnell Sq South can be similar to Beresford Place and James's St. with shared running. Note that Luas trams will only operate along Parnell Sq South about once every 8 minutes in each direction most of the day, while buses are about one a minute. Clearly Luas use is insufficient to merit exclusive or priority use of this stretch.

Impact on other public transport users:

Unlike Luas, BRT is not claiming exclusive use of a corridor and is not pushing out other public transport to fewer streets or less convenient streets. There is some shifting of bus stops and very little rerouting of other buses. The investment in BRT corridor should have a positive impact on other bus routes sharing that corridor. So the impact on other users should be generally positive.

As with Luas, BRT will attract customers from a larger catchment area (once credibility of frequency and reliability is gained). This will have a negative impact on demand for other routes, and will inevitably lead to lower frequency and/or route restructuring, as happened in the Luas corridor. So there will be some areas within 10 to 20 minutes walk of BRT that are likely to have a reduced bus service.

[redacted]

To Whom it May Concern,
I wish to submit my objection in respect of the proposedSwiftway Bus Rapid Transit – Swords/ Airport to City Centre, with particular emphasis upon the selected emerging preferred route for the BRT from the R132 at the Estuary Roundabout through the Glen Ellan distributor Road to the proposed terminus in Oldtown.
This section of the proposed route flies in the face of due diligence in respect of proper planning and assessment of local transport objectives and requirements as set out by an elected body for an area, which in turn will lead to unnecessary and unacceptable impacts upon the receiving environment.
While the Route Options Assessment Report assessestransport planning policy documents in respect of the proposed scheme, and states in its conclusion (Section 2.8)that '*The need for the scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North. BRT is identified as serving this purpose and allowing key development areas such as Swords to continue to develop in advance of this*'. The route selected does not take account of the transport objectives within the Fingal Development Plan 2011 to 2017 or the specific objectives of the Oldtown – Mooretown Local Area Plan (LAP).
Within Section 6.2 of the Route Options Assessment Report,where the stage 1 assessment is carried out, a specific route option should have been assessed in accordance with the Key Transport objective of the Oldtown – Mooretown Local Area Plan, i.e. Section 3.2.7 of the LAP 'Quality Bus Network'.This quality bus network route was based upon an Integrated Traffic Model which was prepared for Swords as part of the document 'Your Swords, An Emerging City, Strategic Vision 2035'. The absence of this route which would have been in accordance with Fingal County Councils transport policy for the local area, shows an absence of proper planning assessment within the Route Selection process.
The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellen Road extension, in particular in respect of Section 3.2 'Movement Strategy andTransportation Infrastructure', where section 3.2.5 'GlenEllan Main Street' of the LAP sets out the proposed objectives of the LAP for the Glen Ellan Road. The LAP objective is for a 6m carriageway with cycle facilities, 4m wide footpaths and 1.5m wide tree lined verges, whereas the BRT is proposing 13m wide carriageway with 2m wide shared surface cycle facilities, 2m wide footpaths and the omission of the tree lined verges. While Section 6.3.2 of the Route Options Assessment Report references the LAP, it then proceeds to disregard therequirements and objectives of the LAP without taking due cognisance of it as a constraint upon the proposed scheme.
Through breaching specific objectives of the LAP, e.g. Key Objectives Transport '*Redesign the Glen Ellan Road Extension so that it's function changes from a distributor road to a main street, which will serve 2 schools, a large park and Local Centre, in addition to dwellings*' the proposed route as planned will have a direct and unacceptable impact upon the existing properties which bound the Glen Ellan distributor Road in respect of noise, air quality, road safety, transport integration, landscape and visual.
Through the planned frequency of buses along this route at 4 minute intervals during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of such duration that it will be in breach of Statutory rights of the residents in accordance

with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe), which will subjected to the unacceptable levels of noise.

As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not takeninto account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.

At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together andGaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.

Added to this is the increased road safety issue which would have been identified had a Stage F road safety audit been carried out as the site lines at the estate entranceways are proposed to be substantially reduced due to the increased carriageway width and the proposal to replace the existingfootpath/ verge/ segregated cycletrack (circa 5m) with a 2m footpath.

Finally, in response to the economic appraisal carried out as part of this route assessment and in particular the emphasis in the reliability of the journey time in promotion of the BRT. It is of note that while the BRT may replace and improve upon existing public buses, there already exists a private express bus service, serving the Glen Ellan distributor road which provides sufficient frequency and reduced travel times in comparison to the public bus service. As such there could be no appreciable cost benefit in spending money on a service to double up and compete with that already in place.

Whereas should the final section of the BRT follow that proposed within the Oldtown – Mooretown Local Area Plan and the report, 'Your Swords, An Emerging City, Strategic Vision 2035' it would complement the existing transport provisions to the Swords Area, improving the service to a catchment area not already served by a reliable express service and it may make economic sense.

[redacted]

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Comments:
I am sure you are aware that GESWRA, my local residents association, have highlighted a number of concerns they have in relation to the Oldtown/Applewood/Swords ByPass (R132) section of your proposed route. The only part that would concern me is the loss of trees along the Glen Ellan Road. Hopefully you have plans to replace these fledgling trees in alternative location(s). Please tell me where.

In contrast to GESWRA I fully support the following:
(i) The pedestrianisation of Jugback Lane – this should have been done ages ago
(ii) Removing the grass verges on Glen Ellan Road. This should encourage more cyclists to use the cyclepaths as they become part of the road and not segregated by the verges
(iii) Reducing Glen Ellan Park green area by 8 metres is not a serious loss in the overall scheme of things. This is a sloping green that is seldom used by children.
(iv) Relocating the skate park at Balheary is a clever idea to not only create a better roadway for the buses but to effectively push back the fire station from the junction and thus allowing safer access and egress. Will the cost of relocating the skate park be borne by the NRA?

Removal of the roundabouts is a double edged sword. It will slow down the traffic flow for sure. Against that it should make all of these junctions safer, for traffic as much as cyclists and pedestrians. The roundabout nearest the Pavillions Shopping Centre is especially awkward and dangerous to navigate at present especially for traffic entering from Feltrim Road. On balance I am in favour of your proposal.

If I understand it properly I gather the pedestrian bridge at the current Estuary Roundabout is to be retained. This will be very important for children playing with Fingallians GAA Club who regularly use the safety of the bridge when crossing in large numbers from the club base to the playing pitches in Balheary Park. This is prevalent every Saturday morning during the playing season.

Away from Swords, in the Santry area I would favour the route away from Santry village out onto the R132 given there is a stop serving Omni SC so close to the Northwood junction.

Finally, congratulations on designing a proposal which I and my household hope comes to fruition sooner rather than later. It would certainly encourage each of us to take the bus into the city rather than drive, even in as far as Drumcondra. The current Dublin Bus routes simply take too long meandering all around Swords before they ever progress towards the city.

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From: John Spain
Organisation: John Spain Associates
Address: 50 Upper Mount Street, Dublin 2

Comments:
Dear Sir/Madam,

Attached is submission on behalf of IPUT plc and Irish Life Assurance plc, owners of Phase 1, Airside Retail Park, Swords Road, Co. Dublin in respect of the proposed Swiftway BRT.

A hard copy of this submission has also been sent by post to the National Transportation Authority offices.

I would be grateful if receipt of this submission could be confirmed at your earliest convenience.

Yours sincerely,

John Spain

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Comments:
Dear Sir or Madam,

I strongly oppose to the proposed Bus Rapid Transit Scheme from Applewood in Swords to the City Centre. The reasons for my objection is based on the following:

Jeopardizing safe route to school for our children:
Road widening will jeopardize hundreds of children who make their way on foot or on bicycle to surrounding schools in Swords (SETNS, Gael School, Thornleigh, St Finnian's Secondary School etc.).

Noise impact:
Road noises will reduce the quality of life for Swords inhabitants. Living in Sandford Wood, we can already hear the traffic noise from the M1, which is 1.5km away.

Removal of Skateboard Park, Balheary Road:
It is a disgrace to even think about removing the skateboard park, which is used by dozens of children and teens, which took many years of work to get built in the first place and which will have a devastating impact on the younger members of our community.

Removal of Green space:
In these modern estates, there is not much green space to start with. Trees and bushes are consistently trimmed and drive bird life away. The proposed removal of green space in Glen Ellan is yet another offense against residents and takes away valuable green space for children at play! Swords has an active soccer community of under 10s. Where are they going to play? On the new junctions?

Jeopardizing existing Swords Express:
Swords Express is an excellent service to the Community. It is a well established bus service to the City Centre. The introduction of BRT would jeopardize the enterprise.

Removal of parking facilities outside primary schools:
Ever walked in heavy rain for 1.5km? Ever had your four year old child walking in heavy rain for 1.5km to school? Sending your child to school drenched? Having 800 parents changing your child's outfit, because it is soaking? Didn't think so! The removal of the existing parking facilities outside the SETNS and the Gaelscoil Bhrian Boroimhe would result in exactly the same scenario as laid out. The removal of the parking facilities outside primary schools will result in heavy traffic and block up roads at peak times.

I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues, that will seriously affect our area are adequately dealt with. There are alternatives, which do not result in DESTROYING local existing communities or PLACING OUR CHILDREN AT RISK along with causing significant disruption and ongoing problems for our local community.

[redacted]

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To whom it may concern;

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

[redacted]

To Whom it May Concern:

We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

We have a number of concerns regarding this route:

1. It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

0175

I Terenure
Come on! Keep it local!

[redacted]

National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Re Public Consultation BRT Routes Swords/Dublin Airport/ City Centre Route

Dear Sirs,

I Love Terenure/Terenure 2030 Project is a collaboration of residents' associations, local businesses and local people whose aim is to develop a Community Framework Plan for the medium and long term enhancement and sustainable development of Terenure Village and wider district serving a catchment of approximately 11,000 persons. It has no political affiliation, Government or Council remit.

We welcome the proposal for the Swiftway route (namely "route 2") that is planned to pass through Terenure and which will serve the wider communities in the catchment area it is intended to serve along this route in Rathfarnham, Templeogue and Tallaght. Currently this area lacks any form of predictable or reliable public transport, and while there are some quite frequent bus routes, journey times covering a modest distance of 5.5km to the city can be up to 45 minutes at peak times.

We also welcome the opportunity to respond to the invitation for submissions in relation to the proposed Swords/ Airport- City Centre route and wish to make the following points-

1. We consider that the northern leg of the Tallaght service (as part of proposed route 2) should be to Dublin Airport and Swords rather than Clongriffin. In other words, route 2 reconfigured to run from Tallaght to the Airport, and route 3 from the city centre to Clongriffin.

2. At present here is no good or reliable direct bus service from the Terenure area to the Airport or indeed from areas further out such as Tallaght, Templeogue and Rathfarnham. Dublin Bus route 16 which currently connects Terenure to the Airport is far too slow to provide an acceptable service. The current scheduled time taken is approximately 1¼ hours. A direct north/south link to the airport would facilitate a greater level of connectivity and integration of the service. It should also benefit tourists entering Dublin from one of the main gateways to the country, Dublin Airport.

3. Consideration could also be given to a combination of routes that could run between Tallaght and the airport and Tallaght and Clongriffin directly without the need for changes in the city centre, which would provide extra choice and flexibility. Part of the reasons behind the recent changes to create cross city routes by Dublin Bus was to address this issue as well as mitigating against the city centre traffic congestion that gives rise to serious "bunching" of buses. The impact of this is to create overlong intervals and lengthy delays.

Terenure Enterprise Centre | 17 Rathfarnham Road | Terenure | Dublin 6w
Tel: 01 499 6561 | email: info@iloveterenure.ie
www.iloveterenure.ie

Terenure West Residents Association

[redacted]

[redacted]

National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Re: Public Consultation Swiftway BRT Route Swords/Dublin Airport/ City Centre Route

Dear Sirs,
This Association represents some 550 households in Terenure. We welcome improvements in public transport and would hope that improved services can be introduced to service this community.

With regard to the Swiftway Bus Rapid Transport proposed routes we hereby set out our observations on same as follows:

There is no direct Rapid Transport service between Dublin South and Dublin Airport. This appears to be a missed opportunity as there is no fast public transport service between south Dublin and the Airport.

We would request you to vary your plan and to have a Tallaght to Dublin Airport route (through Rathfarnham, Terenure etc) instead of Tallaght to Clongriffin as currently proposed. Given the importance of Dublin airport to the region and to improve its connectedness with south Dublin we consider it would serve the people of Dublin in a more optimal manner than what is currently proposed. It would also encourage a more significant changeover from private car to public transport thus boosting the passenger numbers using public transport and reduce dependence on the use of private cars encouraging the growth of more sustainable modes of transport .

The proposed interchange at O'Connell is less than optimal and would detract from the attractiveness of using the BRT to travel to the airport from south Dublin. A seamless north/ south link would be much more beneficial and attractive in encouraging passengers to switch to public transport.

We consider that the Clongriffin route should terminate at the City Centre.

Given the importance of tourism to the Dublin region and the likelihood of increased numbers in future years it is imperative that there is improved connectedness in public transport services in the region. A rapid and connected service from Dublin airport, one of the most important access points to the Ireland, would facilitate movement for visitors in the region.

There is no provision for park and ride facilities in the proposal document. There is sufficient space along the R.Dodder on Dodder Park Road (R112) which could provide some car parking spaces. There are already some 12 car spaces adjacent to the footbridge on the R112.

[redacted]

4. From studying the maps that have been made publicly available thus far, it appears that a passenger who wishes to change in the city centre from the Tallght-Clongriffin route to another, has no obvious interchange points or locations where this can be done, and that this involves a walking journey. Surely a primary object of the Swiftway is to be an integrated service, yet there is no obvious linking between the routes mentioned as currently drafted?

5. We would like to get some idea of the impact the service will have on other road users.

6. We would be most anxious that existing bus services are maintained as they are, except where changes are desirable to provide feeder services to the new system.

We trust that the points raised above are in order, and hope that these are seriously considered by the National Transport Authority in the final determination of the routes.

[redacted]

[redacted]

Comments:
Please find attached on behalf of I Love Terenure/ Terenure 2030 Collaboration our written submission in relation to the National Transport Authority's proposals relating to the Swiftway Bus Rapid Transit – Swords/Airport to City Centre proposed route.

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I ♥ Terenure
Come on! Keep it local!

[redacted]

National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Re Public Consultation BRT Routes Swords/Dublin Airport/ City Centre Route

Dear Sirs,

I Love Terenure/Terenure 2030 Project is a collaboration of residents' associations, local businesses and local people whose aim is to develop a Community Framework Plan for the medium and long term enhancement and sustainable development of Terenure Village and wider district serving a catchment of approximately 11,000 persons. It has no political affiliation, Government or Council remit.

We welcome the proposal for the Swiftway route (namely "route 2") that is planned to pass through Terenure and which will serve the wider communities in the catchment area it is intended to serve along this route in Rathfarnham, Templeogue and Tallaght. Currently this area lacks any form of predictable or reliable public transport, and while there are some quite frequent bus routes, journey times covering a modest distance of 5.5km to the city can be up to 45 minutes at peak times.

We also welcome the opportunity to respond to the invitation for submissions in relation to the proposed Swords/ Airport- City Centre route and wish to make the following points-

1. We consider that the northern leg of the Tallaght service (as part of proposed route 2) should be to Dublin Airport and Swords rather than Clongriffin. In other words, route 2 reconfigured to run from Tallaght to the Airport, and route 3 from the city centre to Clongriffin.

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We trust that the points raised above are in order, and hope that these are seriously considered by the National Transport Authority in the final determination of the routes.

[redacted]

[redacted]

To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

[redacted]

'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

[redacted]

Don té lena mbaineann sé

Is mian liom/linn ábhair bhuartha a ardú maidir leis an mbealach atá beartaithe don scéim nua bus sciopaidh idir Sord/Aerfort agus Lár na Cathrach.

Tá mo pháiste/í/ ár bpáiste/í ag freastail ar Ghaelscoil Bhrian Bóroimhe atá ar an mbealach atá beartaithe don scéim Nua.

Tá mé/muid buartha faoi na nithe seo a leanas:

1. Is gá do thuismitheoirí áirithe a bpáistí a thiomáint ar scoil. Má leanann an sceim ar aghaidh mar atá beartaithe, ní bheidh aon pháirceáil idir an stop ag Coill na nÚll agus an stop ag Seanbhaile. Cruthóidh sé seo neart fadhbanna do thuismitheoirí a bheidh ag iarraidh a bpáistí a thiomáint ar scoil in am agus bainfidh sé an rogha sin uathu.

2. Beidh brú ar thuismitheoirí a gcaranna a pháirceáil sna heastáit ata cóngarach don scoil (Geata Bhunbaire, Radharc an Chaisleáin agus Gleann an Mhuilleora) agus cuirfidh sé sin brú ar na heastáit chéanna

3. Caithfear bheith airdeallach ar shábháilteacht na gcoisithe agus an bealach nua á dhearadh. Níl ach dhá thrasnú beartaithe taobh na scoile agus is gá go mbeadh níos mó ann chun cur le sábháilteacht na bpáistí a shiúlann ar scoil.

4. Beidh níos mó trácht ar an mbóthar, go háirithe ar maidin agus tuismitheoirí ag iarraidh a bpáistí a sheoladh ar scoil agus cruthóidh an trácht bhreise seo contúirt sa bhreis do leanaí.

I/We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

My/Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

I/We have a number of concerns regarding this route:

1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

Is féidir an litir a úslódáil ag an nasc seo a leanas/*Upload this file to NTA Website at the following link*:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

An dáta is deireannaí i gcomhair aighneactaí ná 28-11-14/*Closing date for submissions is Friday 28th November at 5pm*

[redacted]

Comments:
I don't think it is safe to have the Swiftway at Brides Glen due to the kids who walk to the Gaelic and SETNS.
My daughter attends one of these schools and I would be concerned to see a Swiftway every 4 min there.

Thanks

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[redacted]

Comments:
Dear Sir/Madam,

I would be delighted to know how the BRT lane are to be enforced and ask is camera enforcement of the BRT planned? I also think that the enforcement should be rolled out via
All exciting abx networks.

Look forward to hearing from you in due course

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Comments:
Submission/Objection to Swiftway along the Glen Ellan corridor in Swords.

To Whom It May Concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme and in particular, the route from Oldtown/Brides Glen/Castleview and along the Glen Ellan Road of Swords.

I want to object in the strongest possible terms, to the construction of this major project through the heart of our residential area. Not only is the provision of such a service for our area completely unrequired, the total disregard for the impact of this BRT scheme on our neighbourhood, our schools and our safety, removes any slight faith or confidence I may have had in its modification or even its delivery as planned.

I wish to object on the following grounds:

The expansion of the Glen Ellan Road.

The main thoroughfare through our neighbourhood is lined with grass verges and is a safe public amenity for walkers and joggers alike. Not only is it a huge part of the aesthetic of the area, it clearly symbolises our district as residential upon entering.
The widening of the road to facilitate additional bus lanes will not only remove these verges but also encroach inside our estate boundaries, removing walls, mature trees and valuable green playing areas for our children.

The subsequent increased proximity of our houses to the proposed 4 lane road will increase noise pollution through heavy traffic volumes, it will bring additional danger to our children and ultimately diminish the value of our properties. On these grounds alone it is enough to attract the utmost objections.

Proposed Bus Terminus opposite our Schools.

The proposal to build a bus terminus opposite two primary schools calls all common sense into question, but to propose it without any consideration whatsoever (as personally admitted to by your own David King) on how it will affect the schools and surrounding area defies belief.

The removal of parking facilities along the road will cause all sorts of inconvenience for parents and will also encourage parking within the nearby estates. Secondly, the terminus will become an attraction for commuters from further afield to drive to the area and also park in our estates. It could also encourage the introduction of Pay & Display facilities in our estates at a later point.

Ill-conceived and ill considered. Nothing but total disdain shown to the local residents both in drawing up the proposal but also in the public consultations had around the Swords area.

Encroachment inside our Estate Boundaries.

As mentioned above, the proposal to expand inside our estates impinges on the properties and area in which we purchased and abide. It was confirmed that up to 8m of an encroachment in some areas is required to facilitate new BRT bus stops. The loss of the walls around our estate to be replaced with non-matching brickwork will again diminish the look of our area. But overall, the loss of our green areas to bring this traffic closer to our houses is objectionable in the extreme.

Increased Traffic on our main thoroughfare.

It was also admitted to at the local consultation that up to 250-320 BRT buses will pass up and down our road every day of the week from roughly 6am to midnight. On top of what is already a busy road, this increase in heavy traffic is a major hazard in a residential area heavily populated with children. Add the possibility of late night 'reveller' traffic to the nearby terminus and this is a potential problem that is certainly wished to avoid.

Changing of our roundabouts to fully signalised junctions.

Again, the increase in traffic will already slow down access to and from the area, which is congested enough at school times and rush hours. However, the addition of these signalised roundabouts, which provide priority to the BRT's, will grind our neighbourhood to an absolute halt.

Restriction of Access to and from our Estates.

The introduction of the additional bus lanes and traffic will make it extremely difficult and dangerous for residents to pull into and out of our estates. This increased pressure on cars that at many times are laden with young children is unacceptable.

The commencement of a BRT service in an area alongside existing services.

Simply put, the BRT service is not required along the Glen Ellan corridor. The existing Dublin Bus routes along with the Swords Express service cater more than adequately for the area and at no time has any of our Resident Associations been made aware of any sense of a lack of public transport servicing our area. I would be interested to read your own findings in this regard. Secondly, when compared to existing services, the BRT's will not improve on the time it takes to reach the city centre. Considering the newly constructed bus lanes will be heavily congested with taxis anyway, the fastest BRT will only travel at the speed of the fare laden taxi in front of it.

BRT is a second rate replacement for Metro North.

Given the huge expense involved in providing what is essentially just an additional bus route to the city, it seems ludicrous that anyone would consider wasting limited funds on such a folly. Metro North is clearly what is required. It is also proposed not to plough through existing residential areas, causing untold disruption and inconvenience to local residents to provide a service which to all intents and purposes is already provided for.

Conclusion

To summarise, I am wholeheartedly opposed to the construction of the BRT scheme anywhere along the Glen Ellan corridor. Alternative routes nearby are far more suited to such a project should someone completely lose their faculties and still deem it a necessary expense.

Should the NTA genuinely wish to provide a public transport solution to the people of Swords and indeed much needed and lucrative visitors to our country via Dublin Airport, I suggest that the same energies be put into exploring ways to facilitate Metro North and not wasted upon projects that in my opinion have been designed to disrupt, antagonise and endanger local communities rather than serve them.

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The introduction of the additional bus lanes and traffic will make it extremely difficult and dangerous for residents to pull into and out of our estates. This increased pressure on cars that at many times are laden with young children is unacceptable.

The commencement of a BRT service in an area alongside existing services.

Simply put, the BRT service is not required along the Glen Ellan corridor. The existing Dublin Bus routes along with the Swords Express service cater more than adequately for the area and at no time has any of our Resident Associations been made aware of any sense of a lack of public transport servicing our area. I would be interested to read your own findings in this regard. Secondly, when compared to existing services, the BRT's will not improve on the time it takes to reach the city centre. Considering the newly constructed bus lanes will be heavily congested with taxis anyway, the fastest BRT will only travel at the speed of the fare laden taxi in front of it.

BRT is a second rate replacement for Metro North.

Given the huge expense involved in providing what is essentially just an additional bus route to the city, it seems ludicrous that anyone would consider wasting limited funds on such a folly. Metro North is clearly what is required. It is also proposed not to plough through existing residential areas, causing untold disruption and inconvenience to local residents to provide a service which to all intents and purposes is already provided for.

Conclusion

To summarise, I am wholeheartedly opposed to the construction of the BRT scheme anywhere along the Glen Ellan corridor. Alternative routes nearby are far more suited to such a project should someone completely lose their faculties and still deem it a necessary expense.

Should the NTA genuinely wish to provide a public transport solution to the people of Swords and indeed much needed and lucrative visitors to our country via Dublin Airport, I suggest that the same energies be put into exploring ways to facilitate Metro North and not wasted upon projects that in my opinion have been designed to disrupt, antagonise and endanger local communities rather than serve them.

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Comments:
I am opposed to the construction of the BRT system as outlined in the current proposal

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To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

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I look forward to the outcome of the consultation process.

[redacted]

[redacted]

Comments:
Please find attached a submission on behalf of the school community of Swords Educate Together National School.

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Swords Educate Together National School

Roll Number 20145 O

Swiftway BRT Swords to City Centre – Public Consultation

Submission on behalf of Swords Educate Together National School, Applewood, Swords, Co Dublin

To whom it may concern

I write to you at the request of the Board of Management of Swords Educate Together National School. We welcome the opportunity to make a submission in relation to the proposed Swiftway BRT. The NTA proposal has been considered by our Board of Management and by our student council, who represent the interests of children in our school and we are agreed that we strongly object to the route as it is currently designed.

We have two primary reasons for objecting to the proposed route:

1. Safety concerns

The road leading to our school is not open to through traffic. It currently leads to a dead end. While we acknowledge that the development of lands in the area will mean that, at some stage in the future, the road will becomes a through road connecting to the Rathbeale Road; it is our view that the road was only ever intended to be a local road, servicing local traffic from the adjacent existing and planned housing estates. The designation of this road as the Swiftbus Route will upgrade the road from that of a local access road to a primary route. This will inevitably mean considerable traffic on the road. We are concerned that the volume of traffic on the road will

Applewood, Swords, County Dublin.

Phone: (01)-8903899 Fax: (01)-8408752 E-mail: setns.ias@eircom.net Web: www.swordseducatetogether.ie

Principal Teacher: Karl Breen

increase to such an extent as to present a significant danger to the children of our school as they travel to and from school.

Additionally it appears from the plan that buses dropping off and teachers parking within the Applewood campus will need to turn left across the BRT lane when approaching from Applewood (which is the way the majority would be coming). This means turning with the Swiftway bus on your left (passenger side). When exiting the campus car park to turn right to go to Swords, exiting cars will be required to cross two BRT lanes as well as the vehicle road.

In our view this compromises safety for all vehicles and passengers entering and exiting the Applewood campus.

2. Parking Restrictions

The removal of existing on-street parking (immediately in front of the Applewood Campus which is shared by our school, Gaelscoil Bhrian Boroimhe and Fingal County Council) and existing recessed parking adjacent to the proposed BRT terminus is a serious concern for us. At present the majority of our children travel to school by car. As an Educate Together school have traditionally drawn children from across Swords and its environs and most children are not in a position to walk or to take a bus to school. Generally Educate Together schools draw on a larger population demographic given that we are fewer in number. Therefore travelling longer distances to Educate Together schools is common and our school is the same. Car travel to the school and therefore parking for safe dropoff / pickup is a necessity, rather than a decision simply to drive to school.

Our student council recently undertook a survey of children who travel to school by car and the survey revealed that 72% of children travel to and from school by car.

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Parking is a huge issue for our parent body already. There is a small drop off area within the school campus but this does not facilitate those who wish to park and walk with their child(ren) to the assembly area. The combination of on-street and recessed parking available currently allows for the parking of approximately 50 cars. There are 438 children in our school from a total of 299 families. On any given day xx families require to park a car for short periods each day (between 8.15am and 8.45am, 1pm and 1.20pm and 2pm and 2.20pm. This presents significant logistical issues when there are only 50 parking spaces available, if all parking was to be restricted; the situation would be entirely unmanageable.

We have a number of secondary concerns which while they may not impact on our school directly do impact on the children of our school who live in the immediate vicinity of the school. These issues were identified by members of our student council who considered the proposed route:

1. Removal of grass margins along Glen Ellan Distributor Road will mean that children will be in closer proximity to the road than is currently the case.
2. Removal of some green area from Balheary Park will reduce the capacity of the park and impact its current use. Children from the school participate in athletics in the park and many are members of a local GAA club and train and play matches in the area of the park where it is proposed to remove green area.
3. Removal of the Skate Park in Balheary will be upsetting for many of our children who use this amenity on a regular basis to practice their skills in a purpose built facility.
4. The absence of a dedicated park and ride facility for commuters will mean that many will park in housing estates adjacent to the route, impacting negatively on the quality of life for children in those areas. Cars may be parked up from early morning until late evening and will present dangers for children, particularly young

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children who are able to play on roads that are currently primarily used by residents of the estates and are relatively traffic free.

In summary, we at Swords Educate Together National School wish to register our objection to the preferred route identified for the Swiftway BRT. As Swords residents we welcome considered, appropriate improvement to transport infrastructure in our area but we cannot support a proposal which impacts so negatively on the children and families of our school.

We have attached at Appendix 1 a document that captures the views of our student council on the proposal. The student council gave consideration not just to the negative impact of the proposal on the students of the school but also provided a list of suggestions as an alternative to the current proposal.

We appreciate your consideration of this document and of this submission and we look forward to the outcome of the consultation process.

Yours Sincerely

Elaine Bermingham

Elaine Bermingham
Chairperson, Board of Management

Applewood, Swords, County Dublin.
Phone: (01)-8903899 Fax: (01)-8408752 E-mail: setns.ias@eircom.net Web: www.swordseducatetogether.ie
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Appendix 1

Suggestions from SETNS Student Council re: Swiftway bus

Reasons we are against the idea:

" The terminus is at the end of a very busy road that serves two schools, there is no capacity for a bus service"

"Trains are better solution with less impact on traffic"

"Existing bus service will perform the same journey in more or less the same timeframe"

"It's a bad idea because the buses block the view of the cars, it will put children's safety at risk"

" No parking for the school"

"When school is starting and finishing children could get knocked down"

"Children is the new houses won't be able to play on the road"

"It will cause more traffic and pollution in our area"

" Less parking at the school"

"More traffic because people will be leaving cars to get the swiftway"

"People already park cars in the estates beside the schools, this will be way worse if the bus goes in"

Suggestions we would like to make:

"Try and get more land for a new carpark"

"There are places in our locality that are not served by buses, put the stops there instead"

"Build a train line instead"

" Start from a different point"

" Special timetable to ensure that the buses are not on the roads during opening and closing times of the two schools"

" Run the bus down the Rathbeale road not down past the school"

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[redacted]

Comments:
To take away the playing green at Sandford Wood, would move our houses closer, almost on top of an extremely dangerous roundabout. We already have had an incident if a car crashing through the fence and colliding with the front main wall of house on Sandford wood, if you move the roundabout closer to our houses no 99 to 105 you will effectively put us on the roundabout putting all our childrens lives in danger. You will be responsible for any deaths that might occur. The Garda have a record if hiw the car at speed ploughed through the roundabout traversing the green and into the house it is only a miracle that noone was killed. Now you want to put us closer to the roundabout for what us effectively a big bus. Why did you allow some residents of Swords to move this project up here where there are many more young children playing. There is much more space at the end if the road near the GAA where no residents live. Why not have the terminus there.

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Comments:
Dear Sir/Madam, I am submitting my opposition to this service on a number of grounds. Namely. 1. The removal of parking facilities to the two schools located at the proposed terminus. 2. Making Jugback Lane a Pedestrian only road. Although Jugback is currently dangerous I feel that the best solution for this road is a one way system with proper paths running the full length of the road. 3. This service is not necessary for Swords as the Swords Express already provides an excellent service to and from the City Centre. As a local resident I feel that this service would cause huge disruption in the local area. Swords does not need another bus service. It needs a rail link i.e. previosuly proposed Metro North. Kind regards, Robert McDermott

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Comments:
Under no circumstances should there be a pedestrian entrance cut into a wall in Carlton Court. The planning permission for the estate provided for a noise reduction wall to be built where the estate adjoins the Swords Bye-Pass road. The trees on either side of the wall provide for further noise reduction. Very few passengers alight at the existing bus stop.

On examining the plans I do not see any provision for any car parks at the shelters. Please advise where the passengers are going to park their cars.

Please explain why the people in Carlton Court were not put under notice of any proposed changes or alterations to their property.

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[redacted]

Comments:
To whom it may concern.

These are my thoughts on the Swords BRT plans.

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To whom it may concern,

Introduction

I am writing to you as a first year mature student of Planning and Environment management in DIT. I have been following the emergence of this project for a few years and have read many of the supporting documents produced by the various authorities involved over the years. I have also followed the online analysis by experts and the public at large ever since the 2012 documents first undertook a feasibility survey of BRT options for Dublin city.

I, like many, am still slightly surprised that the originally rejected Swords BRT is the first project to go ahead. Considering the comprehensive plans drawn up for Metro North (MN) since its original go-ahead as part of Transport 21, and policy documents as far back as 2000 outlining the traffic demand for it, and that MN is still mothballed.

The Swords BRT corridor is already one of the busiest roads in the country, one which I have experienced on and off for a number of years, commuting or traveling from Drogheda. Ever since I moved from Dublin in 2005 I have taken many different routes into Dublin for education, work, and recreation. Originally the "Commuter" Train service was the most ideal for this. But the price continued to climb, and my ability to pay did not. After the Malahide viaduct collapse I have mostly used Bus Eireanns 101 service, and Matthews Coaches to get to Drogheda.

My father also commutes to Finglas, but uses the N2/M2 via Duleek instead, due to the congestion that forms, and continues to build, from the Swords exit of M1 onwards.

Subtly and slowly, even with some marked infrastructural changes, the traffic along the "North Eastern Corridor" has been increasing all the time. Problems highlighted a decade ago have not received the investment, or the attention they apparently deserve.

A Swords/Rush/Lusk junction change on the M1, or re-paving of Dorset street aside, most change's have been minimal, and traffic continues to build.

The Question of Coaches

As a frequent passenger of long distance coaches along the proposed BRT route, I see constant junction, traffic, and interaction issues between all the various modes of transport, and transport operators.

Bus Eireann and Matthews Coaches are rather frequent along this corridor and interact with many of the same Dublin Bus stops proposed to be set aside for BRT priority. These coaches are all of varying types and ages, and maneuver far more haphazardly and are more bulky than a double decker bus. A coach has a FAR SLOWER loading time than exact fare, 2 door, DB buses, or the more common single door.
With Bicycles, varying ticket types, and even less chance of off bus ticket vending, as well as climbing up stairs, these private and semi-state operators are some of the slowest public transport vehicles imaginable. They take up far more road space and travel time than all other modes likely to share this BRT route, and are thus a major hazard and hindrance to safe operations, and to the public.
I feel that Long Distance coaches are an inferior means of transport for the East Coast Corridor, and to reach Drogheda and beyond, but they are cheaper, more reliable, more comfortable, often faster, and more conveniently located than Rail or private car; for the majority of their journey.

Like it or not, as a mode of transport, Coaches are going to stay on these roads. And as a passenger of the Matthews bus I can attest that since the current college term has started there has been a marked increase in passenger loads at Rush Hour, and has started to leave students and other commuters behind along the BRT corridor itself. Notably the "DCU" stop at Whitehall, where the bus usually reaches full load. Direct city centre services, like the 100x or Matthews IFSC do utilise the Port Tunnel, but many commuter routes still squeeze through Drumcondra/Swords and onwards.

Has the provision of lay-by and set-aside bus stops for Dublin bus services, also taken into account licences for Larger Coach traffic? If this is to be a high frequency "medium open BRT", then why are there competing Dublin Bus routes still present in the first place? Surely the only remaining competition, should be longer distance travel and feeder services?

The best transit mode for the corridor?

Without going into numbers or technology debates, why has so little provision been left for Metro North, and its far greater ability to meet demand? In Swords particularly this BRT is taking up the road median which is earmarked for Metro track. With no Park and Ride facilities on the BRT service, the overall catchment and draw of the service is diminished. With no immediate trust in the idea that BRT is faster than current QBC buses or Private car, less people will be drawn to this Transit corridor because of lower capacity, crowding upon completion, and technological snobbery. A series of branded buses at the medium of standard for BRT will not draw car owners out of poorly designed Swords fringe estates to the related Transit corridor. A "QBC Done Right" approach will not pull in the wider usage and socio-economic good that Metro North could be capable of in my opinion.

The hard infrastructure of a Light Rail tunnel will be seen by all involved as more attractive. The capacity is greater, and so is the potential reach and benefit. Without full segregation and diversion/elimination/merging/feeder-isation of Dublin bus routes, this Transit corridor will be crowded with multiple routes, multiple signage, several competitors, and no clear solution to the traffic demands.

BRT every 2 minutes/15 seconds with dozens of buses and coaches sharing the space will instantly be crowded and simultaneously be delayed by the comings and goings of all public transport vehicles.

The bane of Taxis

Then you have Taxis. Dublins 5th estate when it comes to public transport. They see themselves and are utilised as a stop-gap in the absence of fully Integrated transport, and the shortcomings of Dublin Buses monopoly and the strain it is under in carrying the city. Taxis will effectively insist on use of the shared bus lanes, and scream bloody murder that anything resembling a BRT-ONLY lane could have the audacity to take up road space and create signal and turning priority. In my opinion, though luck, but there is a battle to be seriously fought that can't possibly be fought again when Metro North is eventually needed as a replacement. Why fight a powerful road blocking lobby twice with more money, when you can fight it once?

Human spaces and scale/ Collective Safety

I am all for the added policy of more complete junctions, cycle priority, and human scale use of the roadspace. But with 3 to 4 types of buses moving at speed, ducking into stops, dwelling quickly, and 1 lane of bitter motorists and taxis, the road will get very clogged, very quickly. Currently I try to watch the Cycle lane through Drumcondra with interest, from the bus lane, and I often see it somewhat empty. Due to parking, and suddenly disappearing stretches, the cycle lane is an apparition in places, and a death trap in others. In some sections the idea of 30 /40 km/h cyclists sharing footpaths with residents and footslogging commuters is terrifying. Without dedicated kerbs and further isolation from parking and loading bays, conflicts are likely to be numerous.

One section in particular that bothers me when it comes to cyclists is Westmoreland street. I wholeheartedly welcome the idea of moving as many people as possible through the street scape as conceivable with good engineering, placemaking, and segregation of uses, especially the exclusion of the private car. However, with Luas, BRT, Dublin Bus/Coachs/Aircoach/Emergency services etc etc, sharing 3 different traffic lanes, while pedestrians gain little more space than current capacity allows, this becomes difficult to believe it will work.

Currently the footpath is crowded, barriered by fences, bus stops, signage, and waiting crowds. To shift these crowds meters out from the buildings to a median between cycle paths and the Bus and BRT lanes seems dangerous, and foolhardy. Without clear kerbing, signage, pillars etc, many a pedestrian and queueing commuter will likely want to dash across the active cycle-path to board their respective vehicle, or cross further to the Luas. How can

cyclists expect to move through this space unimpeded with pedestrians coming from every direction?

Exiting shops, traveling at slow and high pace between key streets (sometimes with shopping), queueing, boarding and alighting Buses, Coaches, Trams and BRT, and all across or around the edges of the cycle path.

Earlier NTA renderings of Westmoreland Streets "closure to cars" featured a central bike lane, in between Bus lane and Luas. This older plan also featured a "2 way" D'Olier Street. This is also now a no car zone, and a transit gate of sorts. I welcome the concept, but worry, without a fuller interconnected network that is efficient, the surrounding streets will also become clogged with the now diverted traffic.

Traffic and congestion

I would welcome a congestion charge at the canal's and rivers, but only if a pedestrianised and cycle priority City core existed with multiple modes of integrated public transport. This is a possible future of Dublin if all current and future plans for transport and road re-engineering are implemented within the next 30 years.

City Spine

I fear that the Central spine of our city Grafton Street to O'Connell Street could be jeopardised by half-arsed road markings for transit priority at a time of lower budgets, when large scale infrastructure is also required. Why increase road use by large fast moving multiple occupancy vehicles when part of that axis can be replaced by Underground movement? The Streets above, wide planned ones in this case, could then be further opened up for Public use.

Buses and trams could not possibly disappear from this landscape, but with such massive traffic demand, it seems we're trying to reinvent a solution with tight budgets for the sake of being seen to do something.

How most traffic engineers see your city

How cities should be designed

Copenhagenize Design Co.
2013

Other projects and potential BRT

Blanchardstown to UCD, and Clongriffin to Rathfarnham/Tallaght are perfectly acceptable lower capacity rapid transit corridors, that do not require Light Rail investment. Swords, I fear, is too busy a corridor to withstand the demand and competition without the already planned Metro North.

In my nascent and forming opinion, the Metro West corridor, due to its Overground nature, would also suit a Fully Segregated BRT within the next 15 years, as a deliverable stop gap, and one not restricted by road space. The numbers already speak for themselves in this regard, and as part of an Open feeder service for Dublin bus, orbital routes and maybe the skeleton of a replaced Swords BRT could be briefly served by a Tire based Metro West.. A Pre-Metro BRT of Metro west could help fund the infrastructure ahead of need and prepare the western suburbs for Densification and more sustainable means of living into the late 21st Century.

Jalur Busway (BRT) menggunakan jembatan layang (over pass) / Elevated BRT di Nagoya, Jepang

We have a unique opportunity to get something right in a post-austerity Ireland. The long tendering process is an asset of Public Transport and is important for quelling fears of the potential benefits and harms of such a process. However BRT is utterly new to many people, and the idea of a Metro has already been well seeded into their brains as a necessary concept.

Why spend twice for the same transit corridor?

Final Thoughts:

Upon reading the route assessment report and other supporting documents I have been impressed, and somewhat won over by this project. However I still believe a wider network of options is required to ensure the success of this project in the short to medium term. Without clear connections with other expansions of QBCs, Luas et al in North Dublin, the Swords Corridor will become an isolated and congested Transit route not fit for purpose. With Competition from other Dublin Bus routes I fear some of the advantages and travel times will be lost. A rationalisation of these overlapping routes is required in my opinion, just like adjustments following the introduction of the Luas.

The technology is not the real problem, but capacity and frequency. Without full segregation, or the greater capacity, Swords BRTs main advantage over Metro North is frequency. 4 Minutes between buses is an impressive first goal. And if it is achievable before a larger project like Metro North could be completed, then it is an advantage in the short term. With higher frequency of up to 2 ½ minutes maximum into the future, the BRT option still appears attractive, but will face further capacity restraints.

As areas grow and evolve around the corridor, especially on it's northern fringes, demand and use will change. Development may be slower to be attracted to Buses than is seen with Light Rail in the US currently, or as yet unfinished sub-ways or heavy rail in other urban settings. Development is attracted to fixed rail infrastructure. It see's the potential for growth in guide-ways, power sources and rails. Speculation follows Crossrail in London, and new "Streetcars" in the US. It may struggle to follow marked paint and a bus shelters compared to the Light Rail of Metro North. BRT is aiming to be a lot more medium term than the types of investment new shops and higher density housing can afford. Development of such density aims for longer time spans in order to get a return. Thus BRT is a traffic and transport fix, and not as much of a development attractor. Does this mean shifting development to Luas-Finglas and the regional Railways, or is in-fill of the Swords corridor an after thought for the "market".

I hope to follow the implementation of this consultation process closely, and wish that the wider project is a success. As a student of planning I hope to specialise in Transport Planning myself, so I will be keenly following every aspect of this project from its current nebulous state, to eventually riding the first buses and seeing their socio-economic benefits develop their corridors into the future.

Questions to be asked?

- What provision is there for Coaches?
- Will Coache licenses be re-routed or Fare priority adjusted to other transport modes?
- Is the Cycle Highway element safe without kerbs/bollards?
- What is a Toucan Crossing and how will the public be educated about this?
- Is Swiftway acceptable branding after City Swift?
- Is Dublin Bus the best operator of BRT?
- Are existing DB routes all to be maintained at similar timetables?
- Will Park and Ride facilities be provided in Swords area?
- Is the Transit-Gate re-paving of the City Spine up to the task?
- Will BRT not be crowded in 5 years and require Metro North replacement?
- Will those involved be more accessible to the public in the wake of recent planning and government ire relating to Irish Water Implementation?
- Will PR activities be transparent and approachable, again re-recent poor reception of Irish Water.
- Will Metro North's corridor be safeguarded into the future?
- Will this project receive the appropriate and educated response for successful and informative media coverage?

[redacted]

Comments:
We Would have major issues with the project cost of the project, along with the major works to be undertaken in our area, the prospect of the destruction of a number of tree's along the main Drumcondra road we would totally opposed to the cutting of trees to make way for a proposed station. We would like to take part in future public consultation on the proposed Swiftway Bus Rapid Transit Scheme.

We don't feel we really have been asked where or how and if we want this BRT scheme thought our area.

[redacted]

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[redacted]

From: Conor Kenny
Organisation: Clancourt Group
Address: 4th Floor Two Park Place, Upper Hatch Street, Dublin 2

Comments:
To whom it may concern,
I would like to strongly support the introduction of the BRT. As a significant landowner in both the Earlsfort Terrace, Hatch Street, Charlemont Street and Harcourt Street area we would see the benefits of this for residents, workers and businesses generally in the area. This will hopefully help to put Dublin 2 back firmly on the Map as the Central Business District of Dublin. I would add that with the level of infrastructural investment it is vital that all bodies recognise the importance of utilising the scare resource – land that we have in Dublin 2 and if appropriate to facilitate higher densities of development.
Many thanks and best of luck with the project.
Conor Kenny Chief Executive Clancourt Group

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Comments:
Personally I think this whole idea should be scraped
I have major reservations about the costs
both the cost spent so far on "consultants fees"
and the cost to implement this idea.
the proposed constructions
the proposed time involved
the proposed old of date technology (bendy buses)
the environmental impact
both during construction
and running of buses
the lack of future proofing
this scheme is out of date before
it gets off the ground
this scheme is re-fared to as a Luas on the cheap
I find that statement unacceptable.

this scheme is not a traffic solution fit for Dublin
in the 21st centenary maybe 50 years ago

I will be demanding that not 1 more cent be spent on
this proposal and I will be objecting to An Bord Pleanála.

[redacted]

Comments:
This is a half way house measure that doesn't really add anything for swords residents and commuters. What we had been promised in the last election was a strong push to start work on the metro to dublin airport and swords. Instead we get a compromised bus corridor.

The issue with the route is that it follows swords bypass the r132 even though it is a bus, when not many swords commuters and residents live along th3 r132. E.g. river valley, boroimhe and ridgewood. The excellent swords express service currently serves these areas and commuters have been voting for swords express services with their wallets in droves in recent years. We can already get into the city centre within 35 minutes so this bus service is adding little value,and strikes me as an apology of a service, because fine gael/labour could not commit to the metro project once the 2011 general election was over.

Give us a proper metro line as promised. Otherwise invest in upgrading roads such as the forest road to make them easier for the existing bus services, and safer for walkers, if the budgets for these capital projects has to be so restricted, compared to the splurge in current expenditure that still continues year after year.

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[redacted]

Comments:
The route of the Swords section of this proposed BRT does not make much sense. It will simultaneously bypass large sections of the Swords population whilst also disrupting the current bus services to those and other areas. Currently the Dublin Bus service is poor with long journey times and very few direct services. Any disruption to the already torturous journey will make the commute untenable and this should be kept in mind.

It is ludicrous that a park and ride facility is not being included in this proposed scheme. Long established estates in Swords still have no public transport service whatsoever e.g. Knocksedan, and the lack of park and ride facilities lead to problem parking which can in turn lead to congestion.

Having commuted from Swords to the city centre over several years I do not believe the estimated end-to-end journey time of 45mins is realistic. There is currently little to no enforcement of bus lanes by the Gardai so how will BRT be any different? There needs to be a joint approach by all relevant bodies to make any scheme like this work.

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Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre:

[redacted]

General Issues

Overall, I continue to support the Swiftway concept and consider that the project has so far managed to avoid dilution of its BRT characteristics; in particular, I am very satisfied with the level of segregation provided in the current proposals. However, I note that a lot still appears to be unknown (to the general public) about the current rail study covering the corridor. Based on the 2012 BRT Core Network report, it appears to be envisaged that the BRT service could continue to operate in some form after the completion of a rail line. It also seems sensible to assume that Swiftway services are not to be disrupted unduly by the construction of such a project. In these circumstances, it will be important to ensure that the short/medium-term commitment to Swiftway does not lead to a suboptimal choice of alignment or technology for the longer-term rail project(s).

South City Centre – Westland Row

I note the proposal to divert general traffic away from Westland Row. While this doesn't appear unfeasible, there are a number of issues that haven't yet been publicly addressed; these include:

- the possible impact on residential amenity if traffic is diverted to Sandwith Street, Erne Street and/or Macken Street;
- the treatment of HGVs/high vehicles (bridge clearances on the alternative routes are lower than on Westland Row);
- the possible impact on congestion at the junctions immediately north and south of the Samuel Beckett Bridge (assuming that the changes lead to some traffic which currently uses Butt and Talbot Memorial Bridges being diverted to that bridge).

South City Centre – Lincoln Place/Clare Street/Merrion Street Upper

I have some concerns about the ability of the junction geometry in this area to accommodate future bi-articulated bus operations, although I do acknowledge that significant modifications are proposed. In respect of these modifications, however, I am concerned that pedestrian needs should be taken into account, particularly as regards the removal of traffic islands; this area currently experiences high pedestrian flows and significant pedestrian/traffic conflict.

[redacted]

From: Gaelscoil Bhrian Bóroimhe Cairde na Scoile
Organisation: Cairde na Scoile
Address: Coill na nÚll, Sord, Baile Átha Cliath.

Comments:
Attached please find a submission from the Gaelscoil Bhrian Bóroimhe Cairde na Scoile on the proposed Swiftway Bus Rapid Transit. If you have any queries on our submission please contact Grace Cappock, 087 2024971.

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'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

To whom it may concern,

Cairde na Scoile, Gaelscoil Bhrian Bóroimhe, wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

We have a number of concerns regarding this route:

1. It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

Yours sincerely,

_____

Grace Cappock (087 2024971)
Cathaoirleach
Cairde na Scoile
Gaelscoil Bhrian Bóroimhe,
Coill na nÚll,
Sord,
Co. Bhaile Átha Cliath

[redacted]

To whom it may concern,

Please see this email as my formal objection to the proposed Swiftway BRT system.

From researching all documentation, and reviewing the planning proposal, I truly see no benefit in this system for many reasons.

Firstly the route from Oldtown where the proposed bus terminus is planned and through Glen Ellan; the traffic in this area at peak times is extreamy busy. There are 3 primary schools in this area alone, 4 if you include St. Cronans N.S. I don't see any benefit in adding more traffic to this route.

Secondly you propose to widen the road from the terminus through Glen Ellen and Balheary for the BRT. To say I was disgusted to see this is a huge understatement. As a resident in Castlview Row, your proposed plans are taking most of our road away, including all the green area where my children play and are safe. I bought my house 10 years ago with the added advantage of having this area for my children to play where I could see them. There are children in nearly every house on this road of 21 houses and you are proposing to knock their play area down and build a road. I'm outraged. There is also the issue of road safety for the local children and school children in the area. I am also very concerned about the noise level outside, which is load at peak times as is. Obviously I have a personal interest in this section of the route. However when I see your plans to take more green area from the children at Balheary and the skate park. I really wonder what the thought process was in this planning.

Thirdly the planning of this route does not seem to give any advantage to the community. The route is the exact same as the 41 bus routes which works perfectly fine at present. As does the Swords Express. North County Dublin needs a rail service/ metro service. Traffic needs to be taken off the main roads that are congested. Adding traffic is not a solution. I have read the route will take 35 minutes? I can not understand how this could be possible with bus stops and in rush hour traffic.

My forth point is the cost. The massive cost of this to project to give the people of Swords a service we already have through Dublin Bus and the Swords Express. Fine if the plans for the Metro North won't go ahead but trying to plaster over this with short term costly solution is not the way.

My last point is that this area of Swords as a choice of bus routes public and private, while there are other areas of the town that are seeking improved bus services such as Holywell/Kinsealy and Rivervally/Ridgwood.

[redacted]

[redacted]

[redacted]

Comments:
I am broadly supportive to this initiative to provide additional public transport options in Dublin. However I am very concerned that the only option for running these buses seems to be Diesel.

As the Swiftbus is a completely new proposal, setting a new precedent for public transport investment it seems completely inappropriate to opt for diesel. There are two stark and overwhelming arguments against it. Firstly, Diesel particulate pollution of the local area, and secondly climate change.

Dublin city centre currently suffers a huge image problem for middle-class home owners who already see it as dirty, noisy and crime ridden. As a result urban locations are unpopular, and the nation suffers due to the swathes of car dependent suburbia that people actually choose to live in. In addition the city is also being recognised, finally, as our prime asset in the hugely valuable tourist economy. It is also recognised that the presentation of the city to tourists is lacking in many respects.

While it is accepted that additional public transport is a good thing, greatly increased Diesel transport is not, and adds to the perception (and the reality) of dirty, polluted city streets.

I note studies published in recent years (including by the World Health Organisation) on the harm caused by Diesel particulates to human health, including extreme respiratory and cardiovascular effects, and lung cancer. I would be very interested to learn how the NTA intends to justify the additional urban pollution in its Planning Application submission EIS. This must be explained in the context that this is a wholly new transport service, which does not replace existing bus services. Given the great frequency of the proposed service at peak times I imagine the local pollution effects will be very severe for residents living on the route in dense urban streets.

The second objection to Diesel is on climate change grounds, and is self evident. Following the publication of the recent UN climate change report Irish Environment Minister Alan Kelly said the report was "further irrefutable evidence that climate change challenges our very existence" and that "As a nation, we must do everything in our power to curb our emissions." Irish times 3-11-14.

To finish, while electric, hydrogen or other clean energy sources to power this new bus fleet may be more economically costly, I would suggest that for numerous environmental, social, economic and moral reasons we simply cannot afford Diesel.

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Comments:
I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Impact on the Green space at Glen Ellan Park

As the home owner located closest to the proposed location of the Applewood /Jug Back Lane stop I have significant issues with this specific part of the overall proposal due to the impact that this will have on the Glen Ellan Park Green space.

The plan proposes that the boundary for the green space needs to be pushed back significantly to facilitate the BRT stop; this will reduce the size of this valuable well used play area for children. As the parent of 5 children under 9 years of age who use this space on a daily basis I am particularly concerned as to the potential impact it will have on our children into the future if this plan was to proceed

This is the only safe green area that my children can access and is the main green for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity. There is already a significant gradient on this Green area as it falls towards the Glen Ellan Rd from Glen Ellan Park, the cutting into the green will result in the gradient of this green space becoming dangerously steep at certain points. I am very concerned that children who are playing on the green will run down this slope and be unable to stop before hitting into the wall and rails at the bottom.

In addition it was stated to me at the consultation evening by a BRT representative that a very large area of the green running up to the side of my property will also need to be completely dug up during the construction process, this will have a major impact on my family's quality of live and is completely unacceptable.

I cannot understand the need to locate the stop at this location without taking into consideration the safety of the children who use this green area and the impact that it will have as residents, especially given the amount of undeveloped land on the opposite side of the road in this area.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will also have a significant impact on us as our house backs directly onto Jug Back Lane we are very concerned that once traffic can no longer drive straight through at this junction this area will become a potential black spot for anti social behaviour.

Your Swords – An Emerging City Strategic Vision 2035

I would like to highlight what it is stated on page 45 of Your Swords – An Emerging City Strategic Vision 2035, Fingal County Council about the Glen Ellan Road. It states the "Glen Ellan Road is a 2 lane single carriageway and frontage – free road that has been developed through new residential areas of Applewood and Glen Ellan" in goes on to state that "in the short term this route may provide limited access for parts of Oldtown –Mooretown, but its main function will remain that of a local access road serving the immediate adjoining residential communities."

It further states that "improvements to existing roads in the Balheary / Estruary area will however be insufficient to cater for the full traffic requirements of the Oldtown / Mooretown lands and a new more direct link with M1 Lissenhall interchange is required"

Given that the BRT will reduce capacity on the Glen Ellan Road further to deal with other forms of traffic, it is my opinion that the current proposal is clearly out of step with strategic vision for this area. The Glen Ellan Road is not a main artery it's a "local access road serving the immediate adjoining residential communities"

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment, in particular I object to the removal of trees along the length of Glen Ellan road. This along with the lengthy construction process and increase volumes of traffic on the roadway will significantly impact on our quality of life due to increased noise and air pollution.

Safety for Children

Points of concern include

• As a parent who regular walks and cycles our children up to the Gael Scoile Bhrian Boroimhe the removal of the grass margins, resulting in the footpath being much closer to the road going up the length of the Glen Ellan Road is a particular concern.

• I have significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT, especially at the estate entrances along the route. Also all cyclists not using the left had margin of the roadway and instead sharing the footpath using a partial cycle track is not acceptable.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Removal of the Skate Park, and green space at Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

As a mentor of a number of juvenile teams in the local Fingallians GAA club the significant reduction in the green space behind the goals at the GAA pitch currently used by our club in Balheary Park will result in footballs and sliotars going onto the new roadway, as the boundary with the road will be too close to the existing pitch. Also the area that is used by local runners to do their training will be removed. As Balheary Park is used by a number of clubs for both training and matches, the existing parking challenge in this area will be further compounded by the Swiftway proposal.

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords. I cannot understand how a pedestrian crossing across 8 lanes of traffic (as it will become within the current proposal) on a busy main road can seen as an acceptable alternative to replace the existing footbridges.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North proposal for our area. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project or alternative rail based project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area and my family are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

[redacted]

Comments:
My child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.
I have a number of concerns regarding this route:
1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.
2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.
3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.
4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

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Swiftway Bus Rapid Transit – Swords/Airport to City Centre

[redacted]

Dear Sirs

We wish to express our concerns at the proposed construction of the Swiftway Bus Rapid Transit project due to the impact it will have on our locality both short term during construction and long term once it is complete.

We live on the Swords Road in Whitehall which runs parallel to the N1. The area is only now recovering from the affects of the construction of the Dublin Port Tunnel, a project that we supported.

The greenery and foliage that were planted are now maturing and are providing a benefit to the area. I have no doubt but this area will be disturbed during construction and will take at least 10 years to recover. This greenery provides an excellent barrier to traffic noise from the main road and will be lost. We expect that you will reinstate the existing greenery to a high standard. We are also very concerned that the mature trees at the junction of Swords Road and Collins Avenue will be removed, we object to this.

From a perusal of the plans it appears that traffic travelling east on Collins Avenue will no longer have the benefit of a left turn towards the N1/M1 via a slip road but will be forced to wait at the traffic lights to make the left turn north. Not only will this cause significant tail backs on Collins Avenue but we expect this will force traffic onto our road making it impossible for us to exit from our homes. We will also have difficulty exiting from our road onto Collins Avenue, the presence of a yellow box is of limited assistance.

We were unaware of this project until it was brought to our attention via a flyer from a local politician. We inspected the plans at short notice in Whitehall Columcilles sports hall and were told that flyers were distributed in the area some months ago. We never received any information, nor did many of our neighbours who we contacted.

We do not have any detail on the proposed hours of construction.

We hope you tae this limited submission into account.

[redacted]

[redacted]

Comments:
I object to the proposed Swiftway route from Swords to the City Centre. As a resident of Glen Ellan this proposed route will not help me in any way but will instead hinder access to and from my own home. I strongly object to my taxpayers money being used to make Swords completely inaccesable by car. At the moment traffic flows quite well around Swords because we have so many roundabouts but your proposed plans remove every roundabout in the area and replaces them with traffic lights which in my eyes is a massive step backwards as regards traffic management.
This entire plan seems to be very narrow minded and focuses solely on getting people from the city centre to Swords on the Swiftway without any regard to how this will affect traffic – not everyone has the option of using public transport.
What happened to all the money that was spent planning the Metro?? – which seemed like a much better plan overall for both public transport and private cars.

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Comments:
I wish to object to the proposed swiftway bus route.It is ridiculous that the national transport authority,would remove roundabouts for traffic light junctions, force residents of Swords to become prisoners in their own homes as you tear up nearly every junction that we use, remove social amenities ie skate park, bring extra congestion to our doorsteps,with construction vehicles while building,then people driving to and parking their cars in our estates when heading to city,when the parking is already at a premium in our estates. You give little or no thought to the people of Swords who will have to live with this when your finished, just so you can say you provided a city connection. How about building a proper underground with parking and get it right for once, leaving existing roundabouts in place and not causing unnecessary upheaval for the residents of Swords

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Comments:
Please see submission attached as a document file.

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Submission to National Transport Authority:

SWIFTWAY BRT SCHEME SWORDS/AIRPORT CITY CENTRE PROPOSAL

The proposed Swiftway BRT scheme does not make sense in the context of the high cost of implementing a system which will produce only a marginal improvement in the service it can provide over the existing bus service.
It will neither serve the public's needs for a reliable public transport service nor the National Transport Strategy for a modal shift from private to public transport.

The BRT system will fail to meet the needs of the travelling public because it will not run on a dedicated corridor which is a basic requirement for service reliability. Because it will share a lane with other public service vehicles it will have to compete for road space with them. It will therefore suffer delays through being forced to dwell behind other traffic that stops on the lanes and because of its length will lack the manoeuvrability to be able to bypass halted traffic by moving into an adjacent lane.

Another important reason why it will not achieve its proposed targets is because it is not a tram. It is a known fact that there are many commuters who have a negative attitude towards using a bus but do not have it towards using a tram.

I live on Upper Drumcondra Road and therefore am very familiar with the chaotic traffic situation there. The widening of the lower part of the road will still not solve the congestion problem as even with four lanes throughout its length, the road will still suffer serious congestion. The road was never designed to take the inordinate level of traffic that uses it including in recent times supertrucks despite their being banned from using our roads. The forecast of a significant improvement in the Irish economy will result in an additional increase in traffic on the road further militating against the smooth flow of traffic, an essential requirement for public transport reliability.

Furthermore, introducing a BRT system makes no sense when an alternative system could be installed, namely a Northside Luas system, which would satisfy the requirements of all interested parties. Whilst I accept that the Metro North, as proposed, would be a too expensive alternative considering the current state of our economy, a much cheaper Luas scheme which would run over ground for much of its route, such as was adopted for the existing Luas services, could be installed

I will end this submission with the following:

Luas marks 10th Anniversary

In his remarks the Minister for Transport, Tourism and Sport Leo Varadkar, T.D. said: "Luas is ten years old and has been a phenomenal success. Thirty million passengers use Luas every year and it operates without a Government subsidy. The Luas Cross City extension should add another ten million passengers a year and in future we can hopefully add other lines as well."

Alan Kelly T.D. Minister of State added: "This is a hugely important milestone in Irish public transport. Luas has been one of this country's most successful projects and I look forward to its future growth and development at the core of Dublin's public transport network for many years to come."

Rory O'Connor, Acting Chief Executive of the Railway Procurement Agency said: "The first ten years of Luas has been a remarkable success story, better than anyone expected, and with the construction of the Luas Cross City line now well under way, we are looking forward to even greater success over the next 10 years as the Luas network expands and brings other Dublin communities into the network."

[redacted]

[redacted]

Comments:
To whom it may concern,

I wish to submit my objections to the proposed plans for Whitehall for the Swiftway route.
Thee plans suggest significant permanent disruption to the Old Swords Road as follows

Old Swords road opposite Ellenfield park is to become a shared route for bikes and pedestrians – this is not safe, this is currently a very busy pathway used by a lot of older persons on their way to Church. it is already not a safe road because of the volume of bikes (a large proportion of which use the path) using it. We have already had several incidences where both of our children have nearly been hit by a bike on the footpath as we leave the house to either walk or travel by car.

How are cards meant to use this narrower road – how are we meant to access our driveways?

This area is already significantly disrupted by its closeness to the M1 – all of these works will only bring it closer and add to noise pollution, car fumes – generally making this area a more unpleasant place to live.

Plans to run a bike lane through Ellenfiled park does not make sense – it will involve removing dozens of trees for the sake of a few hundred meters of cycle track? These are beautiful well established trees- why can't the bile route not be left as it currently is (2 way running down Swords road?)

Why has the option of opening up the port tunnel to commuter traffic at reduce cost not been considered?

Why are surveyors (week commencing Monday 25th November) surveying and marking our road late at night and leaving their empty paint canisters on the roadside as litter when this is still at consultation stage.

What plans have been made for residents and likely disruption to our arrangements during these works

Will relocated wall and railing be constructed on materials of similar quality?

As resident if a house that will clearly be affected by this why did we not receive a leaflet through our letterbox – we found out from a neighbour on Monday 25th November

[redacted]

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[redacted]

From: Senator Darragh O'Brien, Councillor Darragh Butler, Councillor Adrian Henchy
Organisation: Fianna Fáil – Dublin Fingal (Swords)
Address: c/o Senator Darragh O'Brien, Leinster House, Kildare Street, Dublin 2

Comments:
BRT Swiftway will not be accepted as a replacement or consolation prize for Metro North. We want Metro North or some sort of light-rail solution linking Swords and North Dublin to Dublin Airport and Dublin City Centre. We cannot allow a situation where LUAS and light-rail solutions are good enough for the south-side but those of us in Swords and on the north-side have to make do with long-extended-bendy buses instead. This is simply not acceptable and we will keep up the fight for Metro North or an equivalent light-rail solution for Swords and North Dublin.

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FIANNA FÁIL
THE REPUBLICAN PARTY

FIANNA FÁIL – DUBLIN FINGAL (SWORDS)

BRT Consultation
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

[redacted]

Dear BRT / Swiftway Consultation,

SUBMISSION RE:

BUS RAPID TRANSIT (BRT) / SWIFTWAY

SWORDS TO CITY CENTRE ROUTE

- First of all, we welcome that the green open spaces at Pine Grove, Mooretown, Broadmeadows, Castlefarm and Castlegrange have all been protected and that Swiftway will no longer go across this route. However, please note that residents along the new preferred route also have concerns and that these have been submitted separately.

- Secondly under no circumstances will we accept BRT / Swiftway as an alternative or consolation prize in place of Metro North. We want the Government to keep their 2011 pre-election promises with regard to Metro North and we want Metro North approved for development when up for review in 2015.

- We would like to state that we are not necessarily against the concept of BRT / Swiftway and in fact we believe that we need improved transport solutions all across Dublin, especially in Swords which has been left behind for so long when compared to the south-side of the City and the light-rail solutions that have been put in place there. However Fianna Fáil Dublin Fingal will not accept BRT / Swiftway as a replacement for Metro North. Fianna Fáil Dublin Fingal want Metro North delivered to Swords and North County Dublin as promised by the Government in 2011 pre-election promises and under no circumstances will BRT / Swiftway be accepted as an alternative or consolation prize in place of Metro North. The estimated BRT cost is in the region of Euro 200 to Euro 250 million. Would this not be better spent towards a proper Metro North or Light-Rail type solution instead?

- Commuter parking is a major concern for all estates along the new preferred route, that their estates will simply become car parks all day long for commuters who park and walk to the nearest Swiftway stop. The lack of a dedicated Swiftway stop around which a major car park could be built is a major flaw in this proposal. Metro North had a proposed car park stop at Lissenhall. We would predict that Pay and Display would have to be introduced to all estates along the Swiftway route which would prove a major inconvenience for residents.

- What about Knocksedan, Ridgewood, River Valley and Brackenstown? There must be a feeder bus service connecting all of the other parts of Swords and out-lying parts of Swords, including Rolestown, St. Margarets, Donabate and Portrane to a Swiftway stop.

- Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway goes ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

- The R132 Airside stop does not adequately serve River Valley, Ridgewood and the rest of the Forest Road as the leaflet states. This stop is simply too far to be within reasonable walking distance. A feeder bus service must be put in place serving this and other parts of Swords, including Knocksedan, bringing residents to / from the nearest stop. A Swords Bike Scheme and proper secure bike parking options would also assist in this regard.

- A fully integrated Swords and surrounds Cycle Lane Network must be put in place, with safe bike parking options and possibly even an extension or version of the incredibly successful Dublin Bikes scheme. This must also link to the Broadmeadow Way to encourage Swords and Fingal tourism and connect the Donabate / Malahide cycle-way to Swords.

- The replacement Skate Park must be put in place before the existing Skate Park is decommissioned. Under no circumstances should Swords lose this important recreational amenity without the new Skate Park having been put in place. As an act of goodwill on behalf of the NTA / BRT / Swiftway in compensation for the years of disruption that Swords residents will face as part of this, serious consideration should also be given to building a BMX track as part of this, funded and sponsored by the NTA. There is already a campaign for a Swords BMX track underway separate to this at present.

- With regard to Balheary Park, if BRT / Swiftway goes ahead, this should not be allowed to have any negative impact on the sporting use of Balheary Park by Fingallians G.A.A. Club, Swords Rovers F.C., Fingallians Athletic club and others.

- Once and for all as part of this, a safe pedestrian crossing point must be put in place at Pinnock Hill and the other Swords / R132 roundabouts. We need to resolve the issue of Pinnock Hill once and for all.

- The stops at Cloghran and Dardistown must be included from the start. For cost saving reasons, surely it is better to put in place all stops from the start rather than us having to fight campaigns in the future to have these stops added at a later date when costs have increased? There should also be a stop at Turnapin put in place from the start, serving the estate, nearby business parks and nearby hotels. This is a significant business area that should also be served.

- A safer pedestrian crossing point must be put in place at the M1 slip road as you come from the direction of Royal Oak (R104), attempting to cross the M1 and continue on Coolock Lane. Cars come around that roundabout very fast towards the M1 slip road and it is not an ideal crossing point for residents, especially for children and the elderly, as currently configured.

- Hundreds if not thousands of Swords residents work at the airport. There needs to be a logical straight forward solution for commuters coming in both directions to be able to transfer from the Swords / Dublin direct Swiftway, to / from the Airport spur, without having to cross roads and change Swiftway stops. A more logical solution would need to be put in place in this regard.

- The BRT / Swiftway bus stops must be configured in such a way that they can also be used by regular Dublin Bus services and private bus / coach providers, such as Swords Express. Swords Express and other private bus / coach services must be accommodated and included in these plans and must not be prevented from using and linking in to these new stops.

Conclusion

Thank you for taking the time to consider our submission and we would ask that you also seriously consider the concerns of the Glen Ellan and Sandford Wood Residents Association, members of the Bunbury Gate / Brides Glen Neighbourhood Group and the concerns of residents in neighbouring estates including Castleview, Applewood and Southbank who have also made submissions. We have included some of these in a separate submission that will follow this one.

BRT Swiftway will not be accepted as a replacement or consolation prize for Metro North. We want Metro North or some sort of light-rail solution linking Swords and North Dublin to Dublin Airport and Dublin City Centre. We cannot allow a situation where LUAS and light-rail solutions are good enough for the south-side but those of us in Swords and on the north-side have to make do with long-extended-bendy buses instead. This is simply not acceptable and we will keep up the fight for Metro North or an equivalent light-rail solution for Swords and North Dublin.

SUBMITTED BY:

FIANNA FÁIL - DUBLIN FINGAL (SWORDS)

SENATOR DARRAGH O'BRIEN

COUNCILLOR DARRAGH BUTLER

COUNCILLOR ADRIAN HENCHY

C/O: SENATOR DARRAGH O'BRIEN, LEINSTER HOUSE, KILDARE STREET, DUBLIN 2

[redacted]

From: Senator Darragh O'Brien, Councillor Darragh Butler, Councillor Adrian Henchy
Organisation: Fianna Fáil – Dublin Fingal (Swords) on behalf of local residents
Address: c/o Senator Darragh O'Brien, Leinster House, Kildare Street, Dublin 2

[redacted]

FIANNA FÁIL
THE REPUBLICAN PARTY

FIANNA FÁIL – DUBLIN FINGAL (SWORDS)

Submission 2 – Submission on behalf of local residents

BRT Consultation
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

[redacted]

Dear BRT / Swiftway Consultation,

Please see as follows some of the concerns that have been raised by members of the Glen Ellan and Sandford Wood Residents Association, the Bunbury Gate / Brides Glen Neighbourhood Group and residents in neighbouring estates including Castleview, Applewood and Southbank who have also made submissions.

We would ask that serious consideration be given to these submissions.

Best regards,

Fianna Fáil – Dublin Fingal (Swords)

Senator Darragh O'Brien

Councillor Darragh Butler

Councillor Adrian Henchy

C/O: SENATOR DARRAGH O'BRIEN, LEINSTER HOUSE, KILDARE STREET, DUBLIN 2

GLEN ELLAN AND SANDFORD WOOD RESIDENTS ASSOCIATION, SWORDS

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points. This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

[redacted]

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas. Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.
- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.
- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

[redacted]

BRT Concept and Metro North

We believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city. We welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, the Glen Ellan and Sandford Wood Residents Association are opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and on-going problems for our local community.

FROM: BUNBURY GATE / BRIDES GLEN NEIGHBOURHOOD GROUP

- The negative impact on residential amenities.
- Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre.
- The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service.
- The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin.
- The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express.

- The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre.
- The lack of planning for park and ride facilities.
- The removal of walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – unacceptable and will not be allowed by residents.
- The removal of existing mature trees and bushes.
- The increased pressure on vehicles exiting the estate (at both entrances/exits).
- Increased traffic with people from "outside" the area coming to use the service.
- Major issues with people using the estate as a car park as there has been NO provision for parking at the new service terminus.
- At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together and Gaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.

FIANNA FÁIL - DUBLIN FINGAL (SWORDS)

BRT Swiftway will not be accepted as a replacement or consolation prize for Metro North. We want Metro North or some sort of light-rail solution linking Swords and North Dublin to Dublin Airport and Dublin City Centre. We cannot allow a situation where LUAS and light-rail solutions are good enough for the south-side but those of us in Swords and on the north-side have to make do with long-extended-bendy buses instead. This is simply not acceptable and we will keep up the fight for Metro North or an equivalent light-rail solution for Swords and North Dublin.

SUBMITTED BY:

FIANNA FÁIL - DUBLIN FINGAL (SWORDS)

SENATOR DARRAGH O'BRIEN

COUNCILLOR DARRAGH BUTLER

COUNCILLOR ADRIAN HENCHY

C/O: SENATOR DARRAGH O'BRIEN, LEINSTER HOUSE, KILDARE STREET, DUBLIN 2

[redacted]

[redacted]

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following :

Pedestrianisation of Jugback Lane

The proposed pedestrianisation of Jug Back will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finains Community College. In addition it will also result in a potential blackspot for anti social behaviour.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellen/Sandford Wood/Applewood/Castleview/ Brides Glen/Bunbury Gate & South Bank areas.

Points of Concern include :

The removal of the grass verges going up the length of the Glen Ellen Road resulting in children walking in a dangerous and close proximity to the busy road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

Increased volumes and regularity of the BRT vehicles using the Glen Ellen Road will result in children being unable to walk safely across to their local shops, playground and all weather facility.

Significant issues and concerns relating to the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT.

Removal of the Skate Park

It took many years of work to get this valuable recreational facility built and its removal will have a devastating impact on the younger and voiceless members of our community.

In summary I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequatelky dealt with. There are alternatives which do not involve destroying local amednities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

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Comments:
Please find attached my submission.

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[redacted]

To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Sandford Wood

The current proposal to replace the roundabout at Applewood / Sandford Wood with a wider junction and traffic signals as outlined in the plan will have a significant impact on the Sandford Wood green space in front of houses 99 – 105 in particular.
The location of this junction will result in the boundary for the green space being pushed back by about 1 – 2 metres at certain points, bringing an extremely busy road perilously closer to houses 99 -105 in particular. It also reduce the size of this valuable play area for children

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

[redacted]

From: Feargal O'Hanrahan
Organisation: Fingallians GAA
Address: Lawless Memorial PArk, Swords

Comments:
Hi

Please see attached a submission/objection to the proposal. My email address if fohanrahan@gmail.com for further information. Note the way the document scanned the first page is actually the second one.

Regards,

Feargal.

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[redacted]

Fingallians GAA Club

C.L.G. FINE GHALLAINN

FOUNDED 1884

Footbridge
Reviewing the plans we note that the proposal is to alter slightly the existing footbridge. Retention of this facility is vital to us and we want confirmation that it will be contained in the final plans submitted,

Construction Phase

When construction work commences around Balheary – how long are the proposed work likely to take? How long will the footbridge be out of commission? as this is the only way to get all teams from club to the playing pitches in Balheary. What will be the boundary treatment level for the works on top and side of Balheary?

Conclusion

To summarise, we have objections around the implementation of this proposed scheme and we would appreciate more details on the likely impacts on Fingallians GAA Club and the grounds it uses for playing sports.

I look forward to the outcome of the consultation process.

Signed:
Print Name: Aidan Scully
Role vice chairman
Address: Lawless Park Swords

Date:

Lawless Memorial Park, Swords, Co. Dublin.
Ceannróid, Páirc Uí Laighléis, Sórd Colmcille
Tel: 01-8400125 01-8400763 Fax: 01-8400914 Email: information@fingallians.ie www.fingallians.ie

Fingallians GAA Club

C.L.G. FINE GHALLAINN

FOUNDED 1884

To whom it may concern,

I wish to make a submission on behalf of Fingallians GAA Club in relation to the proposed Bus Rapid Transit Scheme. Currently, we want to register an objection so our views will be considered in the development of the next phase of the proposed project.

Impact on Balheary Park

The current proposal intrudes into Balheary Park along the front where the top end GAA pitch is located. This is used by teams from U13 up to adult and our concern is that by reducing the distance from the end of the pitch to the new road will result in sliotars/footballs intruding onto the road. Currently, men's team when kicking footballs or pucking sliotars are capable of reaching the existing hedge boundary. This could result in the top pitch being unusable
Further, the current area inside the hedge is used for some training during the winter period when the park is open as street light allows us to train kids on grass.

The area beside the hedge is also used by local runners to do their training, and once removed, it is important to ensure that there is enough path for them to run around the park without intruding on the pitch as runners tend to follow a set path which has a detrimental impact on playing surfaces.

Traffic Volumes

The road from the fire station to Balheary roundabout does suffer from traffic congestion from 5-7pm, parents dropping kids down to the club adds to this traffic congestion. It would be important that provision is made in your road/traffic plans to accommodate this additional traffic. When Fingallians GAA Club host inter-county matches traffic volumes turning right into estuary road can significantly increase. The volume of cars exiting the club peaks at certain time periods and we would like to see how this has been addressed in your traffic models, in particular, the number of cars that are expected to get out on the green light at the estuary side of the dual carriageway.

Commuter/Match Parking

Discussion on how/what is envisioned here – we have parking areas in the club and would like to understand if there an expectation that there might be an impact here. Visiting teams and mentors also currently park along the hard shoulder of the dual carriage way.

Lawless Memorial Park, Swords, Co. Dublin.
Ceannróid, Páirc Uí Laighléis, Sórd Colmcille.
Tel: 01-8400125 01-8400763 Fax: 01-8400914 Email: information@fingallians.ie www.fingallians.ie

[redacted]

Comments:
Our children either are or will be students of Ghaelscoil Bhrian Bóroimhe and access to the school will be greatly impacted by the proposed works. Improvements to transport options in Swords and surrounding areas are important but not a cost to local access and not where there will be hundreds of children trying to access a place of education. Putting their safety at risk through additional motor traffic and poor parking management.

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Swiftway BRT
Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

[redacted]

[redacted]

Don té lena mbaineann sé

Is mian liom/linn ábhair bhuartha a ardú maidir leis an mbealach atá beartaithe don scéim nua bus sciopaidh idir Sord/Aerfort agus Lár na Cathrach.

Tá mo pháiste/í/ ár bpáiste/í ag freastail ar Ghaelscoil Bhrian Bóroimhe atá ar an mbealach atá beartaithe don scéim Nua.

Tá mé/muid buartha faoi na nithe seo a leanas:

1. Is gá do thuismitheoirí áirithe a bpáistí a thiomáint ar scoil. Má leanann an sceim ar aghaidh mar atá beartaithe, ní bheidh aon pháirceáil idir an stop ag Coill na nÚll agus an stop ag Seanbhaile. Cruthóidh sé seo neart fadhbanna do thuismitheoirí a bheidh ag iarraidh a bpáistí a thiomáint ar scoil in am agus bainfidh sé an rogha sin uathu.

2. Beidh brú ar thuismitheoirí a gcaranna a pháirceáil sna heastáit ata cóngarach don scoil (Geata Bhunbaire, Radharc an Chaisleáin agus Gleann an Mhuilleora) agus cuirfidh sé sin brú ar na heastáit chéanna

3. Caithfear bheith airdeallach ar shábháilteacht na gcoisithe agus an bealach nua á dhearadh. Níl ach dhá thrasnú beartaithe taobh na scoile agus is gá go mbeadh níos mó ann chun cur le sábháilteacht na bpáistí a shiúlann ar scoil.

4. Beidh níos mó trácht ar an mbóthar, go háirithe ar maidin agus tuismitheoirí ag iarraidh a bpáistí a sheoladh ar scoil agus cruthóidh an trácht bhreise seo contúirt sa bhreis do leanaí.

We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

We have a number of concerns regarding this route:

1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

[redacted]

Comments:
I am opposed to the construction of the BRT system as outlined in the current proposal. Issues such as the safety of our children, pedestrians and cyclists. It will cause major traffic implications for cars on an already congested route. The removal of the pedestrian bridges is a disgrace and will cut Swords in two.
Holywell in Swords is already cut off from the rest of Swords as there is no pedestrian crossing at the roundabout between Airside and Swords village.
I can't see how the route planned will get people to the city quicker. The Swords Express route is fantastic and if anything that should be developed.
Mostly though, I'm tired of families and children taking second place to 'advancement'.
regards
Roisin

[redacted]

[redacted]

To whom it may concern

Following a review of the preferred route for the Swiftway Bus Rapid Transit Scheme, I would like to make the following submission. I am against the proposed route as it will have an adverse affect on the residents of the housing estates located along the Glen Ellan Road. The proposed Swiftway BRT route along The Glen Ellan Road will be disruptive to residents of the housing estates along this road and it will negatively impact on the residential amenities and the quality of life of the residents of these estates.

The Glen Ellan Road which runs along side a number of housing estates will become a major four lane road. It will have in excess of 300 Swiftway vehicles on a weekday passing from 6.00am in the morning to 12.00am at night at frequencies of up to every four minutes during peak commuter travel times. This level of Swiftway traffic will have a major impact on the area in terms of noise levels, air quality and vibrations, which will affect the residents of the house within the estates along the Glen Ellan Road. In making the decision on the choice of propulsion system, I think that careful consideration needs to be given to the use of an electric propulsion system to eliminate emissions and reduce noise levels, as opposed to a diesel powered propulsion system.

The proposed plan for the Swiftway route involves the acquisition of land from some of the estates along the Glen Ellan Road to facilitate the BRT lanes and Swiftway stops. This will have a negative impact on the residents of these estates by removing green areas that are currently used for recreation and by bringing the perimeter fencing of these estates into very close proximity with houses in certain parts of the estates. This will result in the Glen Ellan roadway (incorporating the BRT lanes) becoming very close to houses along the front of these estates and this will result in increased noise levels and vibrations for the residents of these houses.

There are two primary schools (Gaelscoil Bhrian Bóroimhe and Swords Educate Together national school) and a community centre (Applewood community centre) located along the Glen Ellan Road quite close to the proposed location of the BRT terminus. The proposed Swiftway vehicles will present a danger to schoolchildren and will result in increased traffic congestion at school drop-off and pick-up times. The BRT lanes are proposed along the kerbside and this will present a further risk to both pedestrians and cyclists and it will also require residents living in the housing estates along the Glen Ellan Road to cross over a BRT lane when entering and exiting the housing estates.

The Glen Ellan Road is currently subject to traffic congestion at certain times of the day with queues of traffic building on the approach to the two roundabouts and at the traffic light junction with the Balheary road. These queues can make it difficult for residents of the housing estates along the Glen Ellan Road to exit

the housing estates at these times. The addition of the BRT lanes with Swiftway vehicles passing at intervals of every four minutes during peak commuter travel times will add to the congestion problems and the difficulties in exiting housing estates and will result in an increased potential for accidents.

The proposed plans involve the removal of the existing roundabouts along the Glen Ellan Road and the R132 and replacing them with fully signalised junctions. This will create numerous fully signalised junctions that commuters will have to travel through and in particular commuters traveling in the direction of Dublin city centre. Traffic light sequences will have to allow for the Swiftway vehicles which will be given priority and this will add to the travel times for other road users.

There are limited parking facilities planned along this route and in the vicinity of the BRT terminus. It is therefore likely that commuters who wish to use Swiftway will park their cars in the housing estates along the Glen Ellan Road and walk to a Swiftway stop. This will negatively impact on the residents of the housing estates along the Glen Ellan Road and it will present a safety risk to the numerous children who live in these estates due to the additional traffic volumes and numbers of vehicles parked in these estates which will restrict visibility.

There is a possibility that in order to deter Swiftway commuters from parking in these housing estates, pay and display parking arrangements could be introduced in the housing estates which will inconvenience the residents living in these housing estates and result in visitors having to pay for parking.

In Summary, I am opposed to the Swiftway BRT corridors being constructed along the Glen Ellan Road. I believe that the frequency and volume of Swiftway vehicles and the times of operation will have a negative impact on the residents of the housing estates along the Glen Ellan Road. The Swiftway vehicles will create safety issues for children and pedestrians and have a negative environmental impact through increased emissions, noise, vibrations and the potential use of the housing estates for parking by Swiftway commuters.

The Swiftway vehicles travelling along this road will increase traffic congestion in this highly residential part of Swords and this problem will only increase in future years with the construction of further housing Developments (including the Millers Glen development currently under construction).

I believe that a better solution would be to locate the BRT terminus along the Balheary road and to construct a large park and ride facility and bicycle parking facilities beside the terminus. This area is not highly populated with residential units and there is available land in this area, with the Metro North terminus having previously been considered in this area. Consideration should also be given to running a shuttle bus service between Swords Manor and the BRT terminus at peak commuting times which would serve the housing estates along the Murrough Road and Glen Ellan Road. This proposal would eliminate the need to construct the Swiftway BRT corridor along the Glen Ellan Road which runs through a heavily populated residential area.

[redacted]

[redacted]

[redacted]

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[redacted]

[redacted]

[redacted]

Comments:
I am against Swiftway.Swords does not need another bus service,what Swords needs is the promised Metro North.
We already have Dublin Bus and Swords Express.The Swords Express is an excellent service and its customer base will be destroyed if this goes ahead.
I also believe there are plans to get rid of the Skatepark.
So again I am wholly against Swiftway in any way shampe or form.
To my mind a lightrail system like Metro North or the Dart are the only acceptable alternatives.

[redacted]

[redacted]

[redacted]

I wish to object having this new swiftway bus placed by my estate. To take away our green area outside our houses is a tragedy. I paid huge money for my house on castleview lawns , i bought my house to have a safe and quiet environment for my two kids with a nice green area for them to play. This estate is busy enough with the new millers glen and the school and to have this bus put in place is just crazy. It's not safe with the school. I object I do not want this near my estate, we have enough buses here. Time to re think and get the metro in.

[redacted]

[redacted]

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

[redacted]

[redacted]

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[redacted]

[redacted]

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[redacted]

[redacted]

[redacted]

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[redacted]

[redacted]

Comments:
I disagree with the proposed BRT through Swords.

While an additional public transport method would be welcomed in the way of the previously proposed Metro North, another largely road-based public transport arm is unwarranted.

The planned route also fails to take into consideration the real needs of the community, such as recreation areas – we need more of them, not for existing areas to be reduced or removed altogether. Schools need access for parents to drop and collect their children. Parents need safe footpaths and cycle paths for recreation with their children and in order to have an alternative to driving their children to school.

I honestly do not believe there is any community support for the BRT and sincerely hope that it does not go ahead.

[redacted]

[redacted]

To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Impact on Balheary Park

The current proposal will mean that approximately15 metres of the existing park will be removed along the boundary of the Balheary Road up to the Estuary Roundabout to facilitate the widening of the road for the Swiftway Buses. This will result in the green space behind the GAA pitch currently used by Fingallians GAA Club being significantly reduced in length, this will result in footballs and sliotars going onto the new roadway, as the new boundary with the road will be too close to the existing pitch. Also the area that is used by local runners to do their training will be removed. As Balheary Park is used by a number of clubs for both training and matches, the existing parking challenge in this area will be further compounded by the Swiftway proposal.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Impact on Pedestrians

The current plan proposes to re direct the base of the Fingallians pedestrian bridge in to Balheary Park and proposes the removal of all other pedestrian bridges along the route. This will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

[redacted]

[redacted]

Comments:
We have petitioned for years to be included on the bus routes serving swords. With 166 houses established in the estate and a phase two and three under construction it is imperative that some public transport is put in place. There will be 1000+ residents in the near future without any source of public transport.

[redacted]

[redacted]

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process (circa 2 and a half years) will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.
- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.
- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

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The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

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Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

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Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

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Safety for Children

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Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.
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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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Closing Date for submissions: Friday 28th November at 5pm

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Points of concern include

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The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

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Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

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The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

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Impact on local bus service and other road users

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

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The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

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The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

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The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the dévelopment of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

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Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

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By Post To: BRT Consultation, National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

Closing Date for submissions: Friday 28th November at 5pm

[redacted]

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

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The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

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- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.
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The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

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Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

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The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

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Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

How to Submit This Form
By Post To: BRT Consultation, National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

[redacted]

[redacted]

[redacted]

[redacted]

BRT Consultation
National Transport Authority
Dun Sceine
Harcourt Lane
Dublin 2

Email: info@swiftway.ie

RE: Swiftway Bus Rapid Transit Proposed Route:
Swords/Airport – City Centre

[redacted]

And:

Joe Boland & Son Motor Salvage
Swords
Co Dublin

Business Premises: Joe Boland & Son Motor Salvage

Location: Premises is on the northbound side of R132 slightly south of Airside

Residence:

Location: on the southbound side of the R132 slightly south of Airside

Dear Sirs

We the above mentioned, Juliana and Joseph Boland are writing to you to make a Submission/Observation on the proposed Swiftway Bus Rapid Transit route: Swords/Airport to City Centre following the Proposed Scheme Public Consultation October – November 2014.

There are several points we wish to make as the proposed Swiftway Swords route could directly affect both our residence and business premises.

Submission/Observations relating to the Business Premises. Joe Boland and Son Motor Salvage : Swords, Co Dublin and Semi Detached Cottage adjacent (northside) to the above business premises with particular concern to the route on the R132 in the vicinity of Airside, Swords

Overview:

We are aware that these are proposed routes, and as such are liable to changes when an actual submission is made to the planning authorities. We would not be in favour of any widening of the roads. The current proposed route does not show any widening of the road directly in front of the above business premises, we would like assurances that there will not be any landtake from the frontage or widening of the road directly in front of the premises.

Our initial concerns would be the possibility of any temporary or permanent landtake to facilitate the implementation of the Swiftway Swords route.

Due to Metro North we have had to endure approximately 5 years already between public consultations, oral hearings via An Bord Pleanala, and the scheme been shelved, of not knowing what is going to be happening with regards to our business. This has put extreme mental/emotional and financial stress on us as we are left in limbo – will it go ahead or wont it, - will there be upheaval to us or not – is this going to be the case for the Swiftway aswell ?

Access and Bus Lanes:

The premises has two entrances : are these going to be obstructed either during works or operation of the Swiftway. This obviously would be totally unacceptable as it would cause total disruption to the running of the business, and in affect would mean that the business would have to cease trading.

There will be increased Bus Lane usage – will this cause access issues for us ?

Temporary Possession and Land Acquisition:

The proposed plans show none, we would be against any CPO of land acquisition on our personal and business premises when formal plans are submitted.

Bus Stop:

There is currently a Dublin Bus bus stop located within 100 feet of the business premises. It is proposed that this is moved. We would approve of the moving of the stop as the evening buses can bring a lot of unsocial behavior.

[redacted]

This stop would be popular with potential customers of Wrights night club – located in Airside. There can be 20 + people disembarking at this stop – running across the road, regardless of traffic, being very loud and noisy, throwing empty alcohol bottles/cans onto the streets and into the gardens of the few premises within the immediate vicinity of the bus stop, and urinating onto the walls and inside peoples gardens – this is probably the most abhorrent of the unsocial behaviour that local residents and businesses have to endure and removal of the bus stop would hopefully put a stop to this behaviour.

Our worry would be that if the Swiftway bus stop is located at the same location then this would only serve to increase the above problem.

[redacted]

Overview:

We are aware that these are proposed routes, and as such the current proposed plans and with conversations with their representative Tim Mullen (ARUP) at Fingal County Council offices on 11th March 2014 and 23rd October 2014 it does not appear that there will be any widening of roads directly in front of our residence.

Temporary Possession and Land Acquisition:
The current proposed plans show that there will be non. We would object to any such acquisitions of any of our properties.

Our initial concerns would be the possibility of any temporary or permanent landtake to facilitate the implementation of the Swiftway Swords route.

From observations of the proposed route maps and discussions with Tim McMullen, David King and Donal McDaid it appears that there will be no physical disruption to our premises. We would like to be assured that final plans will not change this position.

The reasons for our above position is that from the roadway there is a footpath, our wall and then within our premises another footpath in front of our home. i.e. we are only the distance of 2 standard size footpaths (approx 5 foot). Our concern would be that if the road has to be widened where would that leave us ? Will there be no footpath outside for us to safely walk to the village, or would our home be literally on the side of the road with no security of a wall to separate traffic and pedestrians from our property. Leaving our home open to vandalism from pedestrians passing by and also leaving ourselves at risk and our home open to the possibility of damage due to the lack of the extra safety of distance between our home and any possible traffic accident which could occur.

The above would be totally unacceptable to us : we have a child and this could potentially put him at risk. Also we have dogs, it would not be acceptable to have open access to our property.

Due to Metro North we have had to endure approximately 5 years already between public consultations, oral hearings via An Bord Pleanala, and the scheme been shelved, of not knowing what is going to be happening with regards to our home. This has put extreme mental/emotional and financial stress on us as we are left in limbo – will it go ahead or wont it, - will there be

[redacted]

upheaval to us or not – is this going to be the case for the Swiftway aswell ? Are we going to have to put on hold any update work on our home as we feel this would simply be money down the drain if we were to lose any amount of our home.

Access and Bus Lanes:
The premises has two entrances : are these going to be obstructed either during works or operation of the Swiftway. This obviously would be totally unacceptable. I do have concerns as to access to our properties once the Swiftway is up and running.

Swiftway Priority at Traffic Lights
I have grave concerns as to the feasibility of the lane layout and priority status at traffic lights.

Bus Stop:
We welcome the fact that the proposed bus stops are to be located on the Airside side of the Airside/Boiroimhe traffic junction.

The reason for our above position is that there is currently a Dublin Bus bus stop located within 200 feet south of our home. This in itself does not normally cause us any great issues during the day, however our worry is that any additional bus routes would only bring more unsocial behavior in the evening.

This stop would be popular with potential customers of Wrights night club – located in Airside. There can be 20 + people disembarking at this stop – they then have to walk along the footpath directly in front of our home. They are usually very loud and noisy, which is an issue in itself as our son is usually in bed by 9 school nights and normally 9.30 – 10 at the weekends. He is constantly awoken by the raucous behaviour of people passing by going to and coming from the local nightclub. Empty alcohol bottles/cans are thrown onto the streets and into our garden. These pedestrians also urinate onto the walls and gates and have actually on occasion climbed over our wall and urinated inside our property – this is probably the most abhorrent of the unsocial behaviour that local residents and businesses have to endure.

However the most upsetting occasion was when one of our dogs became very sick – fits/seizures of some description. Our local vet was concerned that it could possibly have been some sort of drug. This could only have happened by somebody throwing away some drug into our garden.

Presumably at some stage in the future the operator of the route may start a night link style timetable. This would bring much increased early hours of the morning drunken, pedestrian traffic passing directly in front of our home. Our bedrooms are located at the front of the house and it is not possible due to the layout to relocate these to the back of the house. Would you yourselves like to have this ?

We welcome the fact that the proposed plan shows a Swiftway /bus stop to be relocated actually in front of Airside.

Utilities:
We would be presuming that any upgrade of utilities, especially the water pipes along the route, is carried out pre the Swiftway build and that disruption to the various utilities i.e. gas, electric, water, phones will be kept to a minimum.

Summary

We are aware that these are proposed routes/plans etc.

We found the open days at Fingal County Council very informative and the NTA representatives very helpful in explaining the current proposed plans as they are at present.

The basic idea of improving public transport is good, however I am concerned as to whether a large amount of money is proposed to be spent on upgrading the transport network for all the wrong reasons and not because it is actually needed now or in the future. If the population of Swords and its surrounds increase, one of the reasons used to support the Swiftway, would an improved and increased Dublin Bus fleet not suffice ? After all it is the peak times of the day that more buses are needed. We do not need a bus running every 4 minutes throughout the day. However it does appear to be a less intrusive public transport system than other recent transport proposals.

We are reserving any opinion as to the suitability of the current proposed plans and await the final plans to be submitted to the planning authorities. And in this regard we would strongly recommend from a Tax Payers point of view that a full and complete submission is made, i.e ensuring that all research, reports, tests etc that are needed are carried out pre submission and such results are included in the submission Environmental Impact Statement so as to allow all concerned to have full knowledge of the issues involved.

Dublin City Centre
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21 Dawson Street
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Tel: 01 - 662 2995
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[redacted]

[redacted]

DCBA

National Transport Authority
Harcourt Lane
Dublin 2

Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre

Dear Sir/Madam

You have invited submissions on the above plan.

I enclose the Dublin City Business Association's response.

Should you wish clarification on matters I shall be happy to do so.

Yours sincerely

David Brennan

David Brennan
Chief Executive

Chairman
Raymond Peers

Chief Executive
David Brennan

Directors
D Byrne
J Brereton
B Goff
L Kane
L King
P Lenehan
R Peers
T Coffey
(Company Secretary)

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[redacted]

Submission

by the

Dublin City Business Association

to the

National Transport Authority

in relation to the

Proposed Swiftway Service on the Swords / St Stephen's Green Route

[redacted]

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Chapter 1 – Executive Summary

Overview

1 The Dublin City Business Association (DCBA) is grateful to the NTA for the measures being undertaken to improve all transport in the Greater Dublin Area and, in particular, in Dublin City Centre.

2 The DCBA strongly welcomes measures that will bring more persons to visit the city and particularly welcomes measures that will bring more persons to the city for shopping.

3 The DCBA is pleased to acknowledge the consultation that has been undertaken by the NTA in relation to its proposals for Swiftway and the publication, prior to making an application for planning permission, of the maps showing the proposed routes in detail.

4 However, after very careful study, **the DCBA strongly opposes Swiftway, as proposed,** because of the impact that it would have on the city centre.

5 DCBA requests a meeting with the NTA prior to any application by the NTA for planning permission for Swiftway.

Findings

1 The proposed routes for Swiftway are part of an unpublished plan for a revolutionary traffic management system that would exclude all cars from major parts of the city centre. (Chapter 4)

2 There are a number of alternatives to the route proposals.

   a. There are already two private sector services on the route, which make Swiftway unnecessary.

   b. Swiftway could operate from Swords to Parnell Square where it would connect with Luas Cross City without crossing the city centre.

   c. Funding may become available for Metro North, which would make Swiftway unnecessary. (Chapter 5)

3 Bus Rapid Transit (BRT) systems are an excellent concept and work very well in some cities. However, BRT systems require exclusive road space for their vehicles and do not cross the city centre but end at the edge of the city. Clearly, it is not possible to provide such a service in Dublin city because there are no roads or streets or parts of roads or streets available exclusively for BRT buses. The NTA proposal for Swiftway is, therefore, not for a BRT system but for a 'Bus system with a High Level of Service' (BHLS). This type of system incorporates many of the features of BRT systems but is clearly different. (Chapter 6)

4 'Bendy' buses work very well in BRT systems where there is a separation of the BRT route from all other traffic, that is, separation from other buses, taxis, pedestrians, cyclists, car drivers and freight vehicles. This position does not apply to the Swiftway proposal. DCBA opposes the use of 18 m long 'bendy' buses on safety and practicality grounds. (Chapter 7)

5 The DCBA believes that incremental improvements to the city's transport systems, which will increase transport capacity by a maximum of 2% per annum, are likely to be sufficient for future needs and that the Swiftway proposals for an across-the-city bus service are unnecessary. (Chapter 8)

Damage to city's economy

1 DCBA is very concerned that the proposed street changes, which will allow Swiftway buses to travel through some of the city's most important commercial and retail streets, and the unpublished traffic management plan will severely damage the city's economy. (Chapter 3)

2 DCBA believes that the proposals will have the effect of making Dublin city uncompetitive with other towns in the Greater Dublin Area (GDA) and with suburban shopping centres. The proposals, if implemented, will result in a significant decline in the city's retail and commercial trade.

3 The DCBA believes that the proposals to exclude cars from much of the city centre, except for some local access, are especially damaging to the city. (Chapter 4)

DCBA recommends that:

1 Before any application is made to An Bord Pleanála for approval for Swiftway, the NTA should prepare and publish for consultation:

   a. Its traffic management plan for the city centre to show the proposed motor vehicle access routes. (Chapter 4)

   b. An economic assessment of the effect on businesses in the city centre of the Swiftway proposals and the traffic management plan.

   c. An independent survey of commuters on the Swords / St Stephen's Green route to establish if there is a demand for the service.

   d. A costs and benefits study for the Swords / St Stephen's Green route.

   e. A costs and benefits study comparing Swiftway with Metro for the Swords to St Stephen's Green route.

2 The NTA should consider this submission carefully and postpone for at least five years its plans to bring Swiftway across the city. (Chapter 8)

Chapter 2 – Background

Proposals by the National Transport Authority (NTA)

The NTA published proposals for a Bus Rapid Transit (BRT) system in January 2014.

The system proposed was for three routes:

- Swords / St Stephen's Green
- Blanchardstown / UCD through the city centre, and
- Clongriffin to Tallaght, also through the city centre.

The NTA engaged in consultation with interested parties and published a report on the consultation in July 2014.

The NTA published detailed, second stage, route proposals for the Swords / St Stephen's Green route on 14 October 2014 for pre-planning application consultation. Submissions were requested by 28 November 2014.

The BRT proposals first emerged in the Draft Transport Strategy for the Greater Dublin Area (GDA). This was published in April 2012. The GDA includes the County of Dublin as well as Meath, Kildare and Wicklow.

Review of BRT for the DCBA

In August 2014, the DCBA commissioned a review of the NTA proposals. Following receipt of this review in September, the DCBA decided to prepare a submission to the NTA to express its strong opposition to the proposals.

This DCBA submission relates to Dublin City Centre, that is, to that part of the Dublin City Council area that is 'between the canals'.

NTA transport strategy

The Draft Transport Strategy document, published in April 2012, states (page 11) that, over the lifetime of the strategy, buses will continue to be the predominant public transport mode in terms of network coverage throughout the GDA. Among the bus measures proposed are the upgrade of four major Dublin bus corridors to high quality Bus Rapid Transit type operations: Stillorgan Road, Malahide Road, Lucan Road, and Navan Road.

In relation to rail transport, the Luas Cross City development is noted, and it is stated that 'during the medium-term period of the Strategy – between the years 2017 and 2026 – the focus of delivery will be on the two most significant public transport projects in the Strategy, being the DART Underground and Metro North'.

NTA policy context

Because of an anticipated increase in employment and population and because the Metro North and Dart Underground projects have been postponed for fiscal reasons, the NTA has produced its Swiftway proposals to bring about some improvements for bus passengers on some corridors into the city centre. If Metro North is eventually built, as envisaged in the Draft Transport Strategy, then Swiftway will no longer be required.

Essentially, the case for Swiftway is that the service will get passengers to their destinations more quickly. The service could also have the effect of encouraging commuters to leave their

cars at home or in a park and ride (P+R) facility outside the city centre, thus reducing traffic congestion in the city centre. Clearly, while commuters may benefit from the proposal, car users will be adversely affected, as will be seen in Chapters 3 and 4.

In addition to its plans to develop Swiftway, the NTA is proposing additional measures to promote cycling within the city and to encourage walking.

There does not appear to be any dissatisfaction among commuters with the existing transport services so that the Swiftway proposal is not customer-led but, instead, is an initiative by the NTA to anticipate a future transport requirement and to improve the speed at which buses travel to and from Swords and the city.

The DCBA believes that the NTA, before applying for planning permission, should have an independent survey undertaken of whether a Swiftway service is needed from Swords to the city centre. If commuters are happy with the services they are presently receiving from Dublin Bus, it would seem extraordinary to proceed with the Swiftway project.

Chapter 3 – Concerns of Dublin City Businesses

Dublin is a thousand-year-old, low-rise city with businesses spread over a wide area. It competes internationally with other cities but also nationally with suburban shopping centres like those in Dundrum, Blanchardstown, Liffey Valley and Swords, and retail parks like that in Carrickmines.

The retail trade is very important to Dublin. Many shoppers need to, or want to, bring their cars close to their shopping destination. If access to city streets and car parking is not available, shoppers will travel to suburban centres. The retail trade is a major employer (over 25,000 persons) in Dublin City.

Threats to the economy of Dublin City

- Dublin City retailers are already under threat because of street layout changes.
- A report by CB Richard Ellis (*Economic Assessment of the Impact of the College Green Bus Corridor*, August 2010) concluded that there was a discernible economic impact on a number of businesses in the general vicinity of the bus corridor (often known as 'bus-gate'), part of which may have come directly as a result of the introduction of the bus corridor.
- The convenience of shopping centres outside Dublin City, with subsidised or reduced parking costs, is also a major threat to Dublin City retailers.

The core retail and commercial areas need special transport consideration as a matter of public policy. On the one hand, motor vehicle access is needed, but on the other, the streets need to be accessible to shoppers and visitors who may be walking, cycling or using public transport.

Dublin city businesses are interested in the development and growth of the city centre; they therefore want to see as many people as possible coming to the area.

In considering the Swiftway proposals, the concerns of businesses are that there should be:

- continued access by motor vehicles to the city centre
- access by car drivers to the same amount of off-street parking as at present
- [redacted]

Importance of off-street car parking

[redacted]

Dublin City depends on visitors from elsewhere in the country (who mainly travel to the city by car) and visitors from abroad (many of whom tour Ireland by car) who will not know the city. Simple routes to city centre car parks are needed for visitors.

Some of the visitors (including those from Northern Ireland) attend GAA matches, rugby internationals, international soccer matches and concerts in the "3" arena and other venues in the city centre. They will not know the city. If they have a bad experience by getting lost while trying to park their car, they will not return.

Dublin City's car parks accommodate 16 to 18 million car customers annually. Car shoppers, business persons and persons staying in hotels may only come to the city centre five or six times a year. If there are significant changes to access routes between visits, the habit of parking in the centre city will be broken; they may never return.

Dublin City centre needs to stay open to all of the 6.7 million persons on the island of Ireland. Swiftway will provide a service to about 90,000 potential customers, that is, 1.3% of the population of the island.

While the Swiftway route proposals appear to provide some access to almost all car parks, accessing and exiting these will be much more difficult than at present. In a few car parks, the published plans appear to make access impossible.

Economic engine of Dublin City

Dublin City Council has a significant annual expenditure budget. This expenditure is largely made possible by revenue raised from the city's ratepayers. The largest concentration of ratepayers is in Dublin's 1 and 2 postal districts. The rates paid by retailers and commercial users in Dublin 1 and 2 are an important percentage of the revenue of Dublin City Council.

If the 14 October 2014 Swiftway proposals for the city centre are not radically altered, the DCBA believes that the city will lose its retail trade and that commercial users will migrate to the suburbs. The city will experience a sharp decline in its economic health.

Economic assessment of proposals

The DCBA is concerned that no assessment has been published of the economic effect that the proposals for Swiftway and the traffic management plan might have on the city. There is potential for great damage to the city's economy.

The DCBA calls on the NTA to prepare and publish for consultation an assessment of the economic effects of its proposals on Dublin City.

We give examples below of some of the problems that arise at junctions because of Swiftway and Luas Cross City.

Parnell Street / O'Connell Street

It will be almost impossible for cars to travel on Parnell Street across the top of O'Connell Street because:

- the two Luas tracks will need to go through the junction and will have traffic light priority as compared with cars
- the Swiftway buses will go through (north to south and south to north) with traffic light priority as compared with cars
- other buses, coaches and taxis will be travelling through this junction.

The inability of cars to generally travel through the intersection will adversely affect all businesses in Parnell Street to the west of O'Connell Street. It will also impact on the Capel Street area. Parnell Street is an important access street to North City shopping areas.

O'Connell Street / Quays

The quays are the most used approach to the city centre shopping areas from the gateways around the city. If cars cannot move satisfactorily along the quays, much of the access to the city will be ended.

The proposals envisage two lanes of Swiftway buses crossing O'Connell Bridge and one track of the Luas Cross City. All of these will have traffic light priority compared with the east / west traffic on the quays. This will almost certainly bring about gridlock at times.

College Street / College Green

This area includes the bus corridor or bus-gate. The Swiftway route will cross the two Luas Cross City tracks.

This is manageable if there is no other traffic. However, very many buses already use this route and it is an important route for cars wishing to access South Dublin shopping areas (Grafton Street, Dawson Street, George's Street).

Ending car access through College Green to Dame Street and Nassau Street will severely affect retailers on the south side of the city.

Underpasses

The DCBA is completely opposed to Swiftway going through the city centre.

If the NTA decides that it should do so and planning permission is obtained, serious damage can be lessened by building underpasses to allow traffic to flow freely and to allow for continued access for cars to the important city centre shopping areas, north and south of the city.

The underpasses would be at the junctions of:

- Parnell Street / O'Connell Street – North / South
- O'Connell Street / both Quays – East / West
- College Street / College Green / Dame Street – East / West.

In the next chapter we consider the alternatives to Swiftway going through the city centre.

Chapter 5 – Alternatives to Swiftway Proposals

These alternatives are:

1 Terminate Swiftway at Parnell Square where it will connect with the Luas Cross City.
2 Abandon the proposal as there are already private sector services on the route (Swords Express and Aircoach).
3 Build Metro North, thus making Swiftway unnecessary.

1 Terminate Swiftway at Parnell Square where it will connect with the Luas Cross City.

This proposal would bring Swiftway to the city but not across the city. The Swiftway would go down North Frederick Street, turn right at Parnell Street and go round Parnell Square to re-join North Frederick Street for the outward journey. The advantages of this proposal are:

- Passengers would be delivered to O'Connell Street where they could connect with the Luas Cross City.
- Swiftway would have no impact on O'Connell Street or any of the other city centre streets on the route to Earlsfort Terrace.
- Swiftway journey times would be shortened and the route would avoid a great deal of congestion.
- The cost and difficulty of implementing the system would be greatly reduced.

This proposal could be part of an orbital Swiftway service.

2 Abandon the proposal as there are already private sector services on the route.

As Swords Express is reported to be already achieving the journey times anticipated for Swiftway, the issue arises as to whether a BHLS service is needed from Swords to the city centre. Swords Express uses the Port Tunnel to get quickly into the city centre. Swiftway could either use the tunnel or the NTA could work with Swords Express to provide a fast service to the city centre. This idea would eliminate the need to make significant changes in the city centre.

Similarly, there is an Aircoach service connecting Dublin Airport with O'Connell Street. This is a quality service with a vehicle that is suitable for passengers arriving by air. A Swiftway airport service is unnecessary.

5 Build Metro North, thus making the Swiftway proposal unnecessary.

The principal reason why Metro North is not being built is the unavailability of funding.

While the State and the Eurozone have come through a period of austerity, with limited capital investment, it is expected that the European Commission will propose capital spending of about €300 billion before the end of 2014. It is possible that a Metro North project could be eligible for such funds.

The Swiftway proposal would appear to be substantially cheaper than a metro. However, it is not quite so simple.

The true cost comparison between a BHLS and a metro needs to be examined over a long period. It is suggested that the examination be over a 20-year period.

Among the issues that would have to be considered are the costs of each system, the speed of the service, the effect on the city, the cost of road space used by BHLS systems, the environmental impact, etc. (See Appendix 1 for a more detailed consideration of some of the issues involved.)

While there have been cost–benefit analyses of BRT and Metro North, it is possible that no comparison of the costs, benefits and losses of BRT compared with a metro over a 20-year period has been undertaken.

Almost every other capital city in Europe has an underground system. Most major airports in other countries are connected by rail, heavy or light.

Conclusions

- The NTA should consider the DCBA proposal of providing a Swords / Parnell Square service instead of crossing the city.
- As there are already private sector bus services from Swords and Dublin Airport to the city centre, the NTA should re-think the need for any Swiftway service from Swords / Dublin Airport.
- The NTA should commission and publish a costs and benefits study of Swiftway vs Metro North for the Swords to St Stephen's Green route before making an application for planning permission.

Chapter 6 – Comparison of Proposals with BRT Systems in Other Countries

A BRT Standard was developed by the Institute for Transportation and Development Policy. It published its basic characteristics of BRT systems. We list three of the important characteristics below and give a brief comment on Swiftway's conformity to the standard.

Busway alignment

This defines where a busway's dedicated lane is located on the road (e.g. centre aligned, exclusive road, or along one side of the street). The busway is best located where conflicts with other traffic can be minimized. In most cases, the central verge (or median strip) of a roadway encounters fewer conflicts with turning vehicles than those closer to the curb.

The NTA proposal **does not conform** to the above. It is proposed to use the QBC bus lanes. It will not have a dedicated lane. The bus lanes are also at the side of the road, not in the central verge.

Dedicated right-of-way

An exclusive right-of-way is vital to ensuring that buses can move quickly and unimpeded by congestion. Enforcement of the dedicated lane can be handled in different ways, such as delineators, bollards, or coloured pavement.

The NTA is not proposing a dedicated right-of-way. The bus lanes will be shared with conventional buses and taxis. Therefore, the proposal **does not conform** to this characteristic.

Off-board fare collection

Collecting fares before boarding, either through a 'barrier-controlled' or 'proof-of-payment' method, is one of the most important ways of reducing station dwell time and therefore total travel time, thus improving the customer experience.

The NTA is proposing that fares be purchased before boarding the vehicle, so there will be off-board fare collection. The system will be similar to that used on the Luas. **There will not be a barrier-controlled or proof-of-payment entry method before boarding.**

The Swiftway proposals, however, generally conform to the other characteristics of BRT systems. See Appendix 3.

Awards to European cities

The Institute for Transportation and Development Policy awarded points to those systems that most significantly improve operational performance and quality of service. It gave gold (7), silver (16) and bronze (16) awards. None of the seven gold awards was given to European systems.

One of the 16 silver awards is to a European City – Rouen in France – the principal city in Normandy. Cleveland in Ohio in the USA also received a silver award; it is the only North American city to have received an award.

Of the 16 bronze awards, only two are for European systems – Nantes in France and Cambridge in England.

We provide information on each of these systems in Appendix 4.

Comparisons of existing European BRT Services with the Swiftway proposal for Dublin

	Cambridge	Nantes	Rouen	Dublin Proposals
Exclusive use by BRT of streets outside city centre	Yes	Yes	Yes	No – sharing of bus lanes with other buses and taxis
BRT through city centre	No	No	No – but at edge	Yes
18 m buses	No – double decker	Yes	Yes	Yes
Extensive use of park and ride	Yes	Yes	Yes	No
Competition on route with other buses	No	No	No	Yes
Sharing of route with bicycles	No – but cycleway parallel	No	No	No – where possible but some sharing
Guided way	Yes	No	Partly – optically guided at bus stops	No
Off-vehicle purchase of fares	Yes	Yes	Yes	Yes

Therefore, the significant differences between the NTA proposals for Dublin compared with the other three, internationally recognised European BRT routes are:

- The Dublin proposal will share the use of the streets with other buses, taxis and, possibly, bicycles.
- Only in Dublin is it proposed to bring the Swiftway through the city centre.
- Park and ride sites, which are very important to the success of the other BRT systems, are not part of the Dublin proposal.

After considering the extent to which the Swiftway proposals diverge from the international standard, and, examining in some detail the systems in Nantes, Rouen and Cambridge, which have been recognised by the Institute for Transport and Development, it is clear that the NTA's proposals are not for a Bus Rapid Transit system for County Dublin but instead for a modified form sometimes known as BHLS (Bus with a High Level of Service). It is misleading to publicise the proposals as a BRT system for Dublin. The proposal is **NOT** for a BRT.

The reason why the proposals do not conform to the international standards is simple: they cannot. **It is not possible to find dedicated / segregated routes for a BRT system in Dublin. The unused streets are not there!**

BRT systems have been possible in Nantes, Rouen and Cambridge because of unique circumstances that do not apply in Dublin.

In Nantes, the segregated route is in the centre of a major motorway-type road. There is space on the road for motor vehicles on each side, for two BRT lanes and an additional lane, in effect, for the BRT stations / platforms / bus stops. There is no similar wide road into Dublin city.

In Rouen, the three routes share the same street at the edge of the city and parallel to the river. This is possible because there are parallel streets to which cars can be diverted.

In Cambridge, the BRT / busway route is on a disused railway line. Almost the entire route is through open countryside.

These conditions do not exist in Dublin city and so it is not possible to have a BRT system in Dublin city. It is possible to have a BHLS system that will bring passengers to the city and not across the city.

Conclusions

The following features of the NTA proposals for Swiftway for Dublin are acceptable:

1. Payment off the bus (however, there should be validation on the bus as in Nantes, Rouen and Cambridge)
2. Limited stops (although this is a commercial issue)
3. Sharing of the bus lanes
4. Indented bus stops – this is not a feature of any of the other three systems; it is likely to be necessary because of the sharing of the route with other buses.

The major concerns, however, are:

1. The proposed routes through the city centre and their effect on other road users, car parks and, ultimately, on the economy of the city.
2. There do not appear to be any plans (see below) for reorganising existing bus services to give exclusivity to the Swiftway services on the BRT routes. No proposals have been published in relation to such a reorganisation. Conventional buses should, ideally, 'feed' the Swiftway routes.
3. There are no proposals in relation to park and ride sites, which are essential if commuters' cars are to be kept out of the city centre and for Swiftway to succeed.
4. The use of the 18 m 'bendy' buses. (see Chapter 7)

Existing bus services

There are problems with the existing bus services through the centre of the city. A very high proportion of the bus routes are through O'Connell Street.

In addition, routes are **across** the city centre instead of **to** the city centre. This is because of the lack of a central bus terminus in the city centre. There appears to be a low average load factor on buses crossing the city centre. The NTA should consider, as part of a bus reorganisation on the introduction of Swiftway, constructing a central bus station, possibly underground, close to the centre of the city.

Chapter 7 – Choice of Bus Type

The BRT standard does not specify a particular type of bus – the buses can be single or double decker. The NTA is proposing to use a single decker articulated vehicle that is 18.75 m long instead of a double decker that is already in use in Dublin.

The type of bus is important. There are advantages and disadvantages to both types of bus. It is a question of where the importance is placed. If passengers preferred the single decker, this would be a strong argument in favour because it might lead to increased patronage.

Having four doors on the single decker could mean faster loading and unloading of passengers. As the purpose of the system is to have buses reach their destination faster, this would be a benefit.

However, in order to achieve these savings in time:

- the stops / platforms will be significantly longer, thus taking up valuable path / kerb space
- the road space occupied will be 50% greater, thus reducing the space available to other road users
- it will take extra time to clear traffic lights and intersections, thus disadvantaging other road users
- many passengers will have to stand throughout the journey.

The BRT systems in Nantes, Rouen, Amsterdam and Cleveland all use the single decker bendy bus. It works very well in those cities.

However, Swiftway will not be a BRT and its buses will be required to share road space with other buses, taxis, and, in some cases, with cars and freight vehicles. Because Swiftway will not have segregated road space, there is an enhanced safety risk. In Cambridge, where the BRT buses become conventional buses in the city centre, double decker buses are used on the BRT route.

The DCBA is opposed to the use of the 18 m long 'bendy' buses by Swiftway.

Chapter 8 – Incremental Improvement is Sufficient

Population predictions

In 2011, the population of the GDA was 1.8 million, up approximately 8.3% on the 2006 population of 1.66 million. The CSO Population and Labour Force Projections 2011–2041 estimate that the population of the GDA will grow to 2.29 million by 2030 – an increase of 39% over 2006 levels.

The NTA subdivides the population of the GDA into five categories. The percentage of each is shown in Table 1.

Table 1 – GDA categories and population predictions

Location	1996	2006	2030
City centre	6% (84,000)	6% (100,000)	9% (206,000)
Inner suburbs (within the M50)	49%	41%	37%
Outer suburbs (outside M50)	23%	27%	30%
Rural hinterland	17%	19%	17%
Larger hinterland towns	5%	6%	7%
Total	1.4 million	1.66 million	2.29 million

Therefore, it is predicted that there will be a substantial growth in population, with a significant growth in the numbers living in the city centre. The city centre population is expected to double by 2030.

Table 2 – Employment growth

Location	2006	2030
City centre	25% (200,000)	28% (333,000)
Inner suburbs (within the M50)	34%	29%
Outer suburbs (outside M50)	25%	28%
Rural hinterland	11%	9%
Larger hinterland towns	6%	6%
Total	800,240*	1.19 million

*In 2011, the number was 724,800 in employment, a contraction assumed to be due to the economic downturn.

The numbers working in Dublin city centre are anticipated to increase by 65% by 2030. However, a significant number of the additional persons working in the city centre may also live there. These persons will have different public transport requirements than those living elsewhere in the GDA.

In summary, the predictions are that the numbers residing and working in the city centre will grow substantially by 2030.

Mode share of vehicles and people crossing the canal cordon

Dublin City Council and the NTA jointly published a report on the trends[1] in numbers of persons entering the city in February 2014. A table showing modal share is included in the Appendix 2.

If the count for 2013 is compared with the count for 2006, there has been a significant reduction in the numbers of commuters entering the city centre by private car. The numbers of those

[1] Report on trends in mode share of vehicles and people crossing the Canal Cordon 2006 to 2013

cycling and walking has increased substantially. The numbers of goods vehicles has also fallen. The trends are, therefore, in the right direction.

Comments on population and employment numbers

Population projections are notoriously unreliable. Nevertheless, they must be made if long-term plans for expensive infrastructural developments are to take place.

Between 2004 and 2011, there was a rapid increase in population due to large-scale immigration following the admission of Eastern European countries to the EU.

The population of the GDA grew by 8.6% between 2006 and 2011. If this rate of increase continued up to 2030, the population of the GDA would exceed the 2.29 million projected in the NTA report.

Among the factors that might result in a lower population than the 2.29 million projected for 2030 are:

- emigration of Irish Citizens and the return home of EU immigrants
- a reduction of immigration
- a reduction in the birth rate
- movement of population from the GDA to other regions of the country.

While bodies like the NTA must plan for the long term, it would be useful to make a range of population assumptions that would give rise to different solutions.

The projection is that those working in the city centre will grow by 65%, from 200,000 in 2006 to 333,000. Even if these projections are correct, this is a growth in employment of just over 2% per annum.

However, many of those working in the city will also be living in the city by 2030 so that the public transport provision will increase by less than 2% per annum.

It seems that even if this high level of increase in travelling to the city is realised it could be satisfied by **incremental measures** such as those being implemented by the NTA for the years 2013 to 2018.

In the last ten years, there have been a number of developments that have assisted traffic movement in Dublin:

- the port tunnel, which removed many heavy goods vehicles from Dublin's streets
- the additional lane on the M50 and the removal of the toll booths, which have diverted freight and motor vehicles from the city centre as well as the inner suburbs
- the two Luas lines and their extensions, which have been popular with many commuters and shoppers
- the significant investment in Quality Bus Corridors (QBCs), which have reduced bus journey times
- new bridges across the Liffey.

The NTA, in its Integrated Implementation Plan 2013 to 2018, intends to make investments in the following areas (page 39):

- Luas Cross City from St Stephen's Green to Broombridge
- city centre re-signalling project

- Phoenix Park tunnel link
- level-crossing programme
- ticketing / revenue systems
- central traffic control
- station improvement / other enhancements
- network development.

It is expected that commuter trains using the Kildare line will be able to connect with Connolly Station and the Grand Canal Dock in 2015 or 2016.

Conclusion

Many improvements have been made in recent years that have helped traffic flow in the city.

The NTA is currently taking a number of actions, principally in relation to rail, that will bring about further improvements.

At most, the numbers of persons employed in the city centre is likely to increase by no more than 2% per annum. During the period up to 2030, there can be incremental improvements to the city's transport arrangements (bus, light rail, Dart, taxis) that will accommodate those wishing to travel to the city without making major changes to the infrastructure of the city, as is at present proposed by the NTA.

Any decision to bring Swiftway through the city centre should be postponed for about five years. This will allow for:

- an understanding of the impact of Luas Cross City on commuting trends
- closer investigation of the operation of the BHLS / Swiftway systems
- a greater insight into the effect of the ending of the recession on population and employment movements in the Greater Dublin Area
- greater clarity on the possibility of funding for a metro system / Dart Underground.

Appendix 1 – Swiftway vs Metro

Issues for the Swords / St Stephen's Green route

Issues	Swiftway	Metro
Cost	About €200 million	Between €1 billion and €4.6 billion
Capacity of each vehicle	120	468 (three carriages)
Years of use	Maximum of 8 years	30 to 40 years
Attractiveness to users (persuade to leave car at home)	Will be less comfortable than rail	Passengers prefer rail; more likely to encourage more users to leave car at home
Accessibility	Because BRT is at street level, it may be more accessible	Will require travelling underground by steps or lift
Speed	BRT will be quicker than conventional bus	On dedicated track, will be faster than a BRT – no traffic lights
Effect on city	Will have a major impact on city centre	After construction phase, should leave no impact on city centre
Costs of using roads and streets	The dedication of parts of roads to BRT services is not free; a portion of the original cost of the roads adjusted for inflation should be allocated to the BRT	Metro tunnels are additional infrastructure; the existing roads and streets remain unchanged
Operational cost	One driver per 120 passengers	One driver for 468 passengers
Impact on cars and delivery vehicles	Significant closure of streets to traffic, additional one-way streets, traffic light priority, etc.	None
Impact on environment	Diesel engines with pollution but may be ameliorated	Electrically powered with no impact on environment in city
Noise pollution on streets	Could be considerable but will depend on type of bus	No noise at street level
Reliability of journey times	Likely to be less reliable than Metro but more reliable than conventional bus	Likely to be more reliable than BRT
Inter-modal competition	No competition with rail	Will provide competition with bus
Construction	Should be quicker than metro, but work on city streets will take time	Likely to take longer than a BRT

Appendix 2 – Trends in persons entering the city between 7 am and 10 am

Mode	Number of people 2006	Number of people 2013	% 2013
Bus	59,874	56,177	29.23
Rail	33,534	24,969	12.99
LUAS	9,029	10,835	5.67
All public transport	102,437	91,981	47.89
Car	76,850	68,072	35.60
Taxi	1,453	3,111	1.63
Walk	17,114	17,495	9.15
Cycle	4,839	9,061	4.74
Goods	2,291	1,045	0.55
Motorcycles	2,395	1,423	0.74
Total person trips	207,379	192,188	100.0

Vehicle and travel unit movements between 7 am and 10 am

Mode	2006	2013	Change	% change
	Numbers	Numbers	Numbers	
Bus	1,680	1,539	-141	-8%
Car	58,664	54,458	-4206	-7%
Taxi	3,825	5,458	+1633	+43%
Walk	17,114	17,495	+381	+2%
Cycle	4,839	9,061	+4,222	+87%
Goods	2,291	1,045	-1,246	-54%
Motorcycles	2,395	1,423	-972	-41%
Total	90,808	90,479	-329	0%

There has been a significant increase in those cycling to work and a significant reduction in goods vehicles entering the city between 2006 and 2013.

Appendix 3 – Other characteristics of BRT systems

Intersection treatments

There are several ways to increase bus speeds at intersections, all of which are aimed at increasing the green signal time for the bus lane. Forbidding turns across the bus lane and minimizing the number of traffic-signal phases, where possible, are the most important. Traffic-signal priority, when activated by an approaching BRT vehicle, is useful in lower-frequency systems.

The NTA is proposing to use the above methods to reduce journey time.

Platform-level boarding

Having the bus station platform level with the bus floor is one of the most important ways of reducing boarding and alighting times. The reduction or elimination of the vehicle-to-platform gap is also central to customer safety and comfort. A range of measures can be used to achieve platform gaps of less than 5 cm (2.0 in), including guided busways at stations, alignment markers, Kassel curbs, and boarding bridges.

The NTA is proposing to have platform-level boarding.

In addition to BRT basics, the standard identifies several categories of BRT elements and characteristics which contribute to superior BRT systems:

- Service planning: multiple routes, peak frequency buses, and hours of operation
  The NTA proposals conform to the above.
- Infrastructure: passing lanes at stations, minimizing vehicle exhaust emissions, and improved pavement quality
  The NTA is proposing that all existing bus stops on the route should be indented so that the BRT bus will not be held up by conventional buses. The proposals do not specify the type of engine. It is assumed that the fuel would be diesel which would not minimize exhaust emissions. Improving the road surface of the bus lanes on the BRT routes is one of the elements of the BRT strategy.
- Station design and station-bus interface: safe and comfortable stations, number of doors on buses, and reasonable distances between stations
  These are all part of the BRT proposals.
- Quality of service and passenger information systems: branding and passenger information
  The BRT will have its own brand – Swiftway. There will be a passenger information screen at each stop.
- Integration and access: integration with other transportation, secure bicycle parking, and universal access
  In general, the routes proposed are designed to integrate with other public transport routes. It is essential that there be secure bicycle parking. There will be universal access, particularly for wheel-chair users and prams.

Appendix 4 – BRT systems in other European countries

Rouen

The city centre has a population of 110,000 and is part of a metropolitan region of 532,000. It is in North West France and is the historic capital of Normandy.

The Teor BRT system has three lines with 53 stations. In 2008 it carried 45,000 persons per day. The system length is 32 kms.

Routes

All three lines share a common route along the southern edge of the city centre and parallel to the River Seine. They then separate at each end into three separate routes, mainly to the north east and north west of the city.

All of the three Teor routes connect with the Metro which mainly serves the area south of the city centre. The Metro is underground in the city centre. It serves the mainline train station. The city centre terminus of one of the Teor routes is also the terminus of the Metro.

There are no Teor buses or trams through the city centre. However, there are FAST buses and other buses that pass through two city centre routes that they share with cars. Teor connects with the FAST services and other bus services.

Road space

The Teor road space is exclusive, with no other vehicles (except possibly emergency vehicles) having access to it. The important part of the route is at the edge of the city centre. The giving of exclusivity to Teor on a street at the edge of the city centre is facilitated by the existence of parallel, wide streets along the River Seine which can take the east / west traffic. Outside the city centre, the Teor routes are either exclusively for Teor vehicles or are segregated from other vehicles on wide streets that also accommodate cars. Taxis, bicycles or other buses do not use the Teor road space.

Car parks

Although much of the centre of Rouen is pedestrianized, there are ten car parks within the centre city or close to the city centre. Some of these car parks are underground and very large. The city has been made 'permeable' for cars. There are also park and rides sites on the Metro and Teor routes.

Nantes

Nantes is the capital of Brittany. It has a metropolitan area population of about 900,000. Like Dublin and Rouen, Nantes has a major river (the Loire) running through the city.

Busway route

The busway is one route only – from the south east of the city to Foch Cathedral close to the city centre where there is a bus terminus. The busway does not go through the city centre shopping area. The city centre is largely pedestrianized. There is one tramway route through the city centre on a very wide street which also has cars and bicycle routes.

The BRT route is a wide road with space for two BRT lanes, two car lanes and the BRT stations. The BRT has exclusive use of two lanes on this route. However, as it enters the city, by crossing the river, the bus shares the street with other vehicles and has no priority. At very few places, such as crossing a bridge, there is only one lane for the BRT buses. Traffic lights ensure that only one bus uses the lane. The BRT buses have traffic light priority. The busway is on the centre of the street.

The BRT route meets one of the three tramway services close to the city centre. This tramway meets the other two tramway routes a short distance away.

Car parks

There are park and ride sites outside the city centre – all supporting the busway and the tramway. There are six park and ride sites on the busway route, with two of them free of charge. There are car parks surrounding the city centre, with one car park within the city centre.

Cambridge[2]

The city of Cambridge is a university town and the county town of Cambridgeshire, England. It lies in East Anglia, on the River Cam, about 80 km north of London. According to the United Kingdom Census 2011, its population was 123,867 (including 24,488 students)

Busway

The busway operates between Cambridge and Huntington via St Ives.

The busway starts in the city centre as an ordinary bus. About three or four kilometres from the city centre it enters a 'guideway'. This is a segregated track, similar to a train track.

The guideway track – said to be the longest in the world – is made up of two concrete beams with kerbs. Guide wheels on the bus connect with the kerb and run along it to steer the bus.

Both single and double decker buses use the guideway. The service is frequent. Speeds of over 80 km per hour can be achieved over much of the journey. For most of the journey, the guideway is through open countryside.

The advantage of the busway / guideway is that, at the end of the guideway, the bus, unlike a tram or a train, can use ordinary streets.

[2] All of the background information on the cities has been extracted from Wikipedia.

[redacted]

To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

How to Submit This Form
By Post To: BRT Consultation, National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

[redacted]

[redacted]

Camillo Toselli.
The Airport Take Away,
97 Swords Road,
Whitehall,
Dublin 9.

National Transport Authority.
Dun Sceine,
Harcourt Lane,
Dublin 2.

[redacted]

Dear Sir/Madam,

I wish to respond to the public consultation phase of the Bus Rapid Transport Proposal.

I am the owner of The Airport Take Away on the Swords Road. A large part of our daily business comes from passing trade, which we are heavily dependent upon.

In principle, I have no objection to this project. However, as a very long-established business on the Swords Road, I have major concerns regarding certain aspects of the proposal, and how this will impact directly on my business.

Regarding the southbound **'right turn ban'** proposal for the junction of Swords Road/Iveragh Road, this will have a major impact directly on my business. This makes it much more difficult for my customers to access my Take Away. It will also impact directly on my ability to capture passing trade on the southbound approach to the City. This will also impact on my suppliers when trying to make deliveries to my business as this proposal makes access to my business impossible from that side of the Swords Road.

To alleviate this issue, I would suggest a widening of the carriageway on the eastern side of the Swords Road, this would allow a right turning lane to be accommodated on the southbound approach to the junction.

Regarding the '**loss of parking'** spaces on the Swords Road, this is outside of my premises and will have a detrimental effect directly on my business. Parking is already extremely limited, and removing this bay will again impact on the ability of passing trade to access by business.

I am part of a small business community in this part of Whitehall. Business has been difficult over the last number of years, and this area has also been impacted with the closure of our local busy Bank of Ireland branch along with the closure of our local News Agents, which has already had an impact on my own business. I am worried that these new proposals will have a negative impact on my business. I feel this proposal will make it a far less attractive stopping point for my potential customers and will again negatively impact on my livelihood.

I would ask that both these proposals (**Right-Turn ban & Loss of Parking**) be reconsidered and removed from the proposed plans.

[redacted]

Camillo Toselli

[redacted]

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The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.
- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.
- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project. BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

[redacted]

How to Submit This Form
By Post To: BRT Consultation, National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

[redacted]

[redacted]

To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Impact on Balheary Park

The current proposal will mean that approximately15 metres of the existing park will be removed along the boundary of the Balheary Road up to the Estuary Roundabout to facilitate the widening of the road for the Swiftway Buses. This will result in the green space behind the GAA pitch currently used by Fingallians GAA Club being significantly reduced in length, this will result in footballs and sliotars going onto the new roadway, as the new boundary with the road will be too close to the existing pitch. Also the area that is used by local runners to do their training will be removed. As Balheary Park is used by a number of clubs for both training and matches, the existing parking challenge in this area will be further compounded by the Swiftway proposal.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Impact on Pedestrians

The current plan proposes to re direct the base of the Fingallians pedestrian bridge in to Balheary Park and proposes the removal of all other pedestrian bridges along the route. This will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service, a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

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This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

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Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

[redacted] [redacted]

Dear Sir / Madam,

I am writing in relation to the "Bus Rapid Transit" proposal.

I am a Retail Pharmacy owner on the Swords Road in Whitehall, and am very concerned that the proposal of "no right turn" on Swords Road southbound into Iveagh Road, will impact heavily on my business.

The majority of my customers, and deliveries of supplies, currently use this route for access.

I am already struggling to retain custom coming from the northern side of the catchment area, due to the closure of a busy Bank of Ireland branch in Whitehall.

I sincerely hope that both the proposal for "loss of parking" opposite my Pharmacy, and the "no right turn" will be cancelled; or there will be no businesses left in this area of Whitehall!

[redacted]

National Transport Authority,
Dún Scéine,
Harcourt Lane, Dublin. 2.

[redacted]

THE VISCOUNT HOUSE

89 Swords Road, Whitehall, Dublin 9.
Telephone: 837 4492

[redacted]

National Transport Authority
Dún Scéine,
Harcourt Lane,
Dublin 2

Dear Sir/Madam,

I wish to respond to the public consultation phase of the Bus Rapid Transit proposal.

I am a publican and the owner of The Viscount House on the Swords Road. As with most pubs, I have become more and more dependent on the food part of the business over the past number of years.

I have no objection in principle to the project. However, as a long-established business serving Whitehall/Santry and environs, I have huge concerns about certain aspects of the proposal.

Right-Turn ban

The first is the new right turn ban that is proposed for the junction of Swords Road/Iveragh Road southbound. This proposal will impact extensively on my business, in particular the food element of my business. It will simply make it much harder for customers to access my pub. It will also be impossible to capture any passing trade on the southbound approach to the City. It will make it much harder for deliveries to reach my premises and will make it impossible for me and my staff to access my business from that side.

The obvious solution is to widen slightly the carriageway on the eastern side of the Swords Road so that a right-turning lane can be accommodated on the southbound approach to the junction.

Loss of Parking on Swords Road

The loss of parking on the Swords Road opposite the pharmacy would have a similar detrimental effect on my business. It again weakens the "passing trade" market. More directly, it will inevitably lead to more parking outside my premises and less parking for my customers. This again impacts heavily on the food element of my business.

I am part of a small business community in this part of Whitehall. Apart from the recession, we have also been impacted by the closure of a local busy Bank of Ireland branch. I am concerned that these proposals will have a negative effect on my business. These proposals add up to a far less attractive stopping point for potential customers which will materially impact on my livelihood and I would ask that both of these proposals be deleted from the plans.

Yours sincerely

Seamus O'Connell

Seamus O'Connell

[redacted]

CTTC

Coach Tourism and Transport Council of Ireland

[redacted]

Re: CTTC Swords BRT Consultation Draft Response

To Whom It May Concern:

Please find enclosed the Coach Tourism and Transport Council's submission in relation to the above report.

Yours faithfully,

Kevin Traynor

Enc.

1st Floor,
Chamber Buildings,
North Street,
Swords,
Co. Dublin.

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Mob: 085 858 8395

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Swords/ Airport to City Centre BRT Consultation Submission

For Coach Tourism and Transport Council of Ireland (CTTC)

TRANSPORT INSIGHTS

Final Submission

[redacted]

Transport Insights Limited, Ground Floor, 11/ 12 Baggot Court, Dublin 2, Ireland
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3			

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1. Introduction

1.1. Background

Transport Insights, on behalf of our client, the Coach Tourism and Transport Council of Ireland (CTTC), welcomes this opportunity to respond to the current public consultation for the proposed Bus Rapid Transit (BRT) scheme from Swords/ Airport to the City Centre.

1.2. Coach Tourism and Transport Council of Ireland

The CTTC is the representative body for Ireland's coach touring companies and Ireland's private bus operators. It promotes Ireland's top independent coach hire operators.

The CTTC's members are experts in all types of coach hire and transport solutions including: provision of scheduled services, school transport, airport transfers, day tours, extended touring, incentive travel and golf tours. In addition to long distance scheduled services, many of CTTC's member organisations also operate licensed bus services in towns and cities throughout Ireland.

All CTTC members are family-owned companies with a combined fleet of over 1,000 coaches, employing over 2,000 people directly. The CTTC comments and makes representation regularly on matters of concern to its members such as public transport, school transport, the coach tourism sector and the tourism industry generally.

1.3. About Transport Insights

Transport Insights is an Irish based transport planning consultancy. With a core team of internationally experienced consultants, we provide innovative, effective and deliverable advice and cost effective, sustainable solutions. Since establishment in early 2013, our client list has expanded to include business groups, asset managers, developers, transport operators, local authorities and national government agencies in Ireland and internationally. Recent Transport Insights' experience includes:

- Advice to domestic bus operators in relation to the National Transport Authority's autumn 2013 proposals to directly award bus contracts to Dublin Bus and Bus Éireann (September – October 2013);
- Strategic advice to Cork City and County Councils in relation to the National Roads Authority's ongoing N40/ South Ring Road Demand Management Study (March 2014, ongoing); and
- Demand forecasting, financial and economic appraisal advice for a planned €400+ million renewal programme on Bucharest's Metro system (September – November 2014).

2. Current Scheme Proposals – CTTC Observations

2.1. Overview

CTTC members welcome the opportunity to respond to the National Transport Authority's proposed BRT scheme from Swords/ Airport to the City Centre. CTTC members are supportive of capital investment in public transport, and support the potential role of BRT within an integrated transport network. In addition, in the context of the Swords BRT corridor, they recognise the shorter term potential of certain BRT features to deliver faster journey times in a cost effective and affordable manner. CTTC members have, however, major reservations in relation to the nature of the Authority's current BRT proposals for the Swords/ Airport to City Centre corridor.

The scope of the main technical document – the *'Route Options Assessment Report'* has been to inform the identification of the preferred alignment for the proposed scheme, however information and analysis presented in the document suggests significant further work is necessary to test the robustness of the rationale for the scheme. It also appears to flag up questions in relation to the scheme's value for money and impacts on existing commercial bus operations. These concerns are elaborated upon in the remainder of this submission.

2.2. Need for the Proposed Scheme

The document notes that the proposed Swords/ Airport to City Centre BRT scheme was included in the NTA's Integrated Implementation Plan 2013 to 2018 on the basis of it providing an interim solution along the corridor:- *"While including the proposed scheme in the Integrated Implementation Plan 2013-2018, the NTA Plan also states that while BRT does not have sufficient capacity to serve this link over the longer term, it would provide an interim transport solution in the shorter term, pending the development of a higher capacity rail solution, such as a metro, on this corridor."* The need for the proposed scheme has not however been outlined within the consultation documents. Specifically, no evidence is presented in relation to the:

- levels of current and future demand by mode along the corridor in the absence of the proposed scheme; and
- specific operational performance challenges facing public transport (overcrowding, delay, unreliability etc.) and private transport modes (poor journey times and journey time unreliability).

Without a clear exposition of the current transport challenges facing the corridor and how these are likely to evolve over time, the need for the proposed scheme is unclear. Furthermore, demonstrating

the extent to which the proposed scheme would address these challenges would provide tangible evidence of the proposed scheme's appropriateness - this is, at present, unclear.

2.3. Spatial and Land Use Planning – Regional Planning Guidelines and Fingal Development Plan

The *'Regional Planning Guidelines (RPGs) for the Greater Dublin Area (2010-2022)'* and the interrelated *'Fingal Development Plan (2011-2017)'* set the planning policy for the Greater Dublin Area and Fingal respectively. Both the *'RPGs'* and the *'County Development Plan'* are supported by the Authority's *'Greater Dublin Area Draft Transport Strategy for the Greater Dublin Area 2011 to 2030'*. Within the RPGs, Swords is designated as a Metropolitan Consolidation Town, and the Guidelines state that the 2011 population of 43,000 could reach 100,000 within 25 years (according to the current Swords Masterplan). The County Development reaffirms this level of future growth – *"in the long term, pop. of Swords could grow to 100,000 depending on Metro North."* As such, the designation of Swords as a Metropolitan Consolidation Town in the *'RPGs'*, and the achievement of the level of population growth as envisaged within both the *'RPGs'* and the *'Fingal County Development Plan'*, is predicated upon delivery of Metro North.

Further emphasising the criticality of Metro North, the *'Fingal County Development Plan'* states that only 4,010 residential units out of a total of 9,672 future units are located within zoned lands that are dependent on delivery of Metro North.

2.4. Metro North

Metro North emerged as key element of the Authority's *'Greater Dublin Area Draft Transport Strategy 2011-2030'*:- *"Metro North is a key project of the Strategy, designed to provide a high capacity public transport link serving the northern section of the city area and extending to the Designated Town of Swords. It also connects Dublin Airport, the main entry point into Ireland by air, to the city centre with a modern, high quality rail service."*

A Railway Application Order has been approved for Metro North, however as noted in the current *'Route Options Assessment Report'*, construction of the scheme was officially deferred upon publication of the Department of Public Expenditure and Reform's *'Medium Term Exchequer Framework'* in November 2011. The scheme remains a key element of the Authority's current Strategy, and the Route Option assessment Report states:- *"The need for the (proposed BRT) scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport*

service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North."

The official status of the scheme is 'deferred', however based on our review of the current proposed scheme, it is considered likely that the current proposed BRT scheme could be a major contributory factor in a decision to change its status to 'cancelled' due to:

- significant feasibility challenges adding to the cost and time required to construct Metro North with the proposed scheme in place (e.g. along the R132 where the alignment of the proposed Metro North scheme extends from the Estuary Roundabout in the north to Airside Retail Park in the south, i.e. running along the same alignment); and
- insufficient transport demand to warrant both BRT and metro schemes along the same corridor, and negative implications for the latter scheme's economic case.

2.5. Demand Forecasting, Economic and Financial Appraisal

Chapter 10 of the *'Route Options Assessment Report'* provides an overview of demand and economic appraisal activities undertaken in support of the identification of the alignment of the proposed scheme. The report clearly states that this work has been undertaken in support of a *"comparative analysis of the route options"*, i.e. not as a basis for justifying the case for the scheme itself. It is noted elsewhere in this submission that a Preliminary Business Case would be expected to have been developed at this stage in the development of a transport scheme. In this context, we observe the following:

- ***Model appropriateness***:- The full Greater Dublin Area (GDA) Multi-Modal Transport Model has been used as the basis for demand forecasting. This is considered to represent a potentially appropriate analytical tool, however as the model is strategic in nature, local area model validation would have provided greater confidence in the relatively small changes between the various scenarios analysed. This could also have implications for the overall economic case (and Business Case) for the proposed scheme, however prior to undertaking the required validation checks, the criticality of this issue is unclear.
- ***Overall demand/ demand matrices***:- Future transport demand is derived from assumptions on the location, nature and scale of future development within the model. Land use data within the model is consistent with the *'RPGs'* and *'Fingal County Development Plan'* development aspirations/ allocations. As noted earlier, both of these are predicated on delivery of Metro North, with the population increasing from approximately 43,000 in 2011 to up to 100,000 in the longer

term. The *'Route Options Assessment Report'* states that BRT is *"to be designed however so that it could in the future, subject to demand, be increased to a capacity of 4,500 ppdph by using longer vehicles"*, however should Metro North not be delivered, this may require a review of the scale of development in Swords, potentially capping its ultimate growth at a much lower level.

The Report states that *"Opening year demand matrices for 2018 were derived based on linear growth between the 2006 and forecast year of 2033 demand matrices developed by the* NTA." This approach is considered unsatisfactory as:

- A linear interpolation of growth between 2006 and 2033 would imply that 44% of the growth between both years having been delivered by 2018;
- As a result of the recent recession, and near complete halt in new development activity from 2008 onwards, this level of growth by 2018 appears implausible; and
- Transport user (economic) benefits are derived primarily from journey time savings - reduced journey times on public transport, and traffic decongestion. If the level of future development along the corridor is lower, transport demand would be lower and so will the economic benefits of the proposed scheme. As such the level of economic benefits in 2018, and in each year to 2032 are likely to be lower than currently forecast.

- ***Modelling of BRT demand***:- The *'Route Options Assessment Report'* states that *"the modelling parameters used to define the Swiftway service are more comparable to rail based modes than bus."* While the validity of this assumption is considered appropriate for a comparative assessment of options within this report, for Business Case purposes presenting the evidence in support of this assumption would be beneficial.
- ***Appraisal period***:- A 30-year appraisal period has been selected in undertaking the economic appraisal for the scheme *"as set out in relevant guidelines for major transport schemes."* Relevant Irish guidance[1] states that *"An evaluation period of 30 years should normally be used, where the life of the asset is 30 years or more"*. Furthermore UK guidance[2] states that *"The analyst should set out the evidence justifying the chosen appraisal period."* In light of the Authority's assertion that the proposed BRT scheme shall perform *"an interim transport solution in the shorter term,*

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1 Guidelines on a Common Appraisal Framework for Transport Projects and Programmes, Department of Transport, May 2007.

2 TAG Unit A1.1, Cost-Benefit Analysis, January 2014

pending the development of a higher capacity rail solution, such as a metro" the rationale for a 30-year appraisal period is unclear.

- ***Modelled years***:- Despite appraising the scheme over a 30 year period, it appears that only two future years have been modelled – 2018 representing the assumed Opening Year and 2033 representing an assumed Forecast Year. It is unclear how demand and benefits beyond 2033 have been derived, however in light of the passenger demand implications of future delivery of Metro North on a similar alignment to the current proposed BRT scheme, this could have a major bearing on the economic case for BRT. Conversely if a decision is made to progress with the proposed BRT scheme, it could have major adverse implications of the economic case for Metro North.
- ***Benefits breakdown***:- No apparent breakdown of economic benefits by type has been provided. To provide greater confidence in the economic outputs, it would be helpful to set out a disaggregation of benefits for public transport users (some or all of enhanced journey times, reduced headways, improved reliability, reduced crowding etc.) and private transport modes (decongestion), and the basis for these estimates (e.g. journey time savings of x minutes on public transport from Airport to City Centre and Swords to City Centre, reduction of y no of vehicles kilometres as a result of mode shift, reduction of z minutes in vehicular journey times along the corridor).
- ***Financial appraisal***:- This does not appear to have been undertaken to date, with the *'Route Options Assessment Report'* stating *"It is proposed to undertake a financial appraisal of the preferred scheme in terms of internal rate of return etc. as part of the Preliminary Business Case once the costings, fares etc. are finalised."*

The analysis to date has focussed on comparative analysis of options, rather than the overall scheme justification, and as noted in Section 10.2.18 of the *'Route Options Assessment Report'*, a series of other benefits have yet been quantified. In the context of the apparent absence of an (absolute) economic and financial appraisal for the scheme, the concerns highlighted above reinforce CTTC member concerns in relation to the Authority's proposals.

2.6. Scheme Business Case

The Authority's Guidelines[3] recommend development of a Preliminary Business Case as part of the Scheme Concept and Feasibility phase of scheme development. Despite the scheme having clearly advanced to the subsequent Option Selection phase, the *'Route Options Assessment Report'* indicates that this will be *"prepared as part of the next stage of the project."* In the context of the issues highlighted in relation to the future delivery of Metro North (Section 2.4), and under Demand Forecasting, Economic and Financial Appraisal (Section 2.5), the absence of a Business Case at this stage in the proposed scheme's development represents a major risk to the scheme's viability.

2.7. Impact on Commercial Bus Operations

The proposed BRT scheme operates along the same corridor as existing commercial bus operators, including Swords Express and Aircoach. Swords Express currently operates 100 daily departures on weekdays, carrying 640,000 passenger per annum. As a CTTC member, Swords Express have been consulted by Transport Insights in relation to their expectation of likely impacts on their operations. From the information provided by Swords Express, the following key impacts have been identified:

- Severe disruption to their services during the construction phase, including increased delay and access restrictions to certain stops along the alignment of the proposed scheme. At present, these impacts do not appear to have been quantified, nor does a Construction Phase Traffic Management Plan appear to have been developed to mitigate these impacts.
- The proposed BRT route is to operate on the same corridor as that which is currently used by Swords Express in relation to 39 (out of 48) of its services to the City and 44 (out of 52) services from the City on weekdays.
- 14 Swords Express bus stops are to be relocated, increasing walking times – of up to 800m – from key residential and commercial areas and bus stops.
- A further 5 Swords Express bus stops are to be removed, with no plans for replacement.
- The proposed alignment of BRT within the median of the R132 will result in a loss of existing bus lanes, undermining the capacity of Swords Express to operate a fast and reliable bus service.
- Impaired ability to operate an 'express' brand of bus service.
- Increased passenger confusion, dissatisfaction and journey times.

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[3] Guidelines for the Management of Public Transport Investment Projects Delivered by Conventional Procurement, Table 3.2: Deliverables Required at each Project Gate

- Increased operating costs arising from increased journey times as a result of the proposed loss of bus priority.

In light of the above, it appears that the current proposed scheme is deemed likely to have a severe adverse impact on Swords Express operations, substantially reducing its attractiveness relative to both its present offer, and relative to the proposed BRT scheme. As a result, Swords Express has requested that the Authority provide base and forecast future (do-minimum and do-something) passenger link flows for each operator - Dublin Bus, Swords Express and Aircoach - along the corridor of the proposed scheme.

Based on their bus industry knowledge, and familiarity with the market from Swords to the City Centre, Swords Express has also highlighted the following:

- The lack of evidence in support of an asserted transport deficit along the corridor, and related concerns in relation to the robustness of the 2018 BRT demand forecasts in the vicinity of Swords. These concerns appear to be backed by issues raised under the Demand Forecasting, Economic and Financial Appraisal heading of this submission.
- Concerns in relation to the ability to achieve a target BRT journey time of 35 minutes from Swords to the City Centre in light of the proposed shared use of infrastructure with conventional buses, Luas and taxis.
- Concerns in relation to the size and design of proposed new shared stops – 24m in length, and the inability of such stops to accommodate more than one stopping bus at any one time.
- The absence of revenue projections and breakdown of cost estimates – again this has been noted earlier in relation to the absence to date of a financial analysis for the proposal.
- Concerns in relation to a possible breach of EU State Aid rules should a direct award contract be issued to Dublin Bus to operate the services, and a related need for any future subsidy requirement to be independently investigated before the project is granted Government funding.
- The lack of information in relation to reconfiguration of Dublin Bus services following introduction of BRT gives rise to concerns in relation to the deliverability of the required changes.
- The need to change the focus of planning towards:
    - enhancements to existing bus services and infrastructure (including signal prioritisation and off-vehicle ticketing) in the short-term, which can be implemented at a fraction of the cost to the current proposed scheme; and
    - mass urban transit schemes such as light rail or metro (Metro North) in the longer-term.

Swords Express has also highlighted the lack of any direct engagement to date between the Authority and the management of Swords Express in relation to the implications for its service operations, staff and the ongoing viability of its business.

2.8. Consideration of Alternatives

The consideration of alternatives to date has been undertaken in the context of future delivery of Metro North. As noted above, CTTC members would question the deliverability of the proposed Metro North scheme if the current BRT scheme proposal were to progress. Should Metro North not progress, the appropriateness of BRT on this corridor needs to be reviewed, with consideration given to higher-capacity options such as light rail. The ongoing Fingal/ North Dublin Transport Study commissioned by the Authority appears to represent a timely opportunity to do so (see Section 2.10 for further details).

The role of the private sector in meeting the challenges presented by future growth along the corridor, through for example, enhanced commercial express services from Swords to the City Centre and Dublin Airport to the City Centre should be examined. Such services could play a valuable interim role in meeting future demand along the corridor – in particular as noted earlier, demand forecasting undertaken by the Authority to date appears to overestimate peak period demand. The *'Route Options Assessment Report'* acknowledges the potential role of these services in accommodating demand growth between Swords and the City Centre as follows:- *"It was considered that the routes proposed in Option 1 and 2 (Swords to City Centre) are already covered to some extent by private operators providing 'point to point' services through the Port Tunnel and the level of service can be enhanced in the future by additional capacity provision if necessary."* It does not appear however that the potential role of such services has been examined. Furthermore, it does not appear that the operator of these services – namely the Swords Express - has been consulted to ascertain their interest and capacity to enhance service provision to meet future forecast transport demand. In the absence of demonstrating that these services cannot meet the scale of future along the corridor, the case for substantial exchequer investment as current proposed is unsubstantiated.

2.9. Operation Proposals

It is understood that, following completion of the proposed scheme, the Authority intends to directly award the contract to operate services to Dublin Bus. In the absence of the Authority completing a financial analysis for the proposed scheme within the context of the Preliminary Business Case, the rationale for this proposal is unclear, and its timing appears premature. In addition to the severe impact on existing commercial operations along the corridor arising from the proposed scheme, private operators would be precluded from tendering to operate the services. It is noted that based on current

forecasts (the robustness of which are questioned in Section 2.5 of this submission), future BRT passenger demand per kilometre is likely to be similar to existing Luas operations, with the latter services operating without a state subvention. Even were a state subvention requirement to emerge as an output of the financial analysis, the absence of full route specific financial transparency within Dublin Bus operations risks placing this operator at an unfair commercial advantage in the market. This is particularly concerning in the context of the Authority's upcoming plans to launch competitive tendering in the bus market in Dublin.

2.10. Fingal/ North Dublin Transport Study

It is noted from the Authority's website[4] that a transport study is presently underway in relation to the north-south corridor connecting Swords and the City Centre, and that the Authority's proposed BRT scheme along this corridor has prompted it's commissioning.

The overall objective of the study is *"to identify the optimum medium term / long term public transport solution connecting to Dublin City Centre, which serves the key destinations in the General Scheme Corridor, including, in particular, Dublin Airport and Swords."*

Furthermore, it is noted that *"The study will identify and assess all feasible public transport options to service north –south radial movement in the General Scheme Corridor in the horizon year of 2035."*

While the detailed scope of this study has not been published, It is apparent that the proposed BRT scheme is included as part of future do-minimum scenarios, i.e. its future delivery is assumed, and not forming part of the wide range of options to be assessed by the consultant team. This assumption, while consistent with the Authority's Integrated Implementation Plan 2013-2018, should it impede or preclude delivery of Metro North it would appear to be inconsistent with the Authority's Greater Dublin Area Draft Transport Strategy 2011-2030.

It is recommended that the Authority review the assumptions underpinning this study, and expand upon its scope, as follows:

- Include consideration of short, medium and longer term transport demands and identification of priority challenges along the corridor from Swords/ Airport to the City Centre (and not just the medium-long term as appears to be presently within scope).

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[4] http://www.nationaltransport.ie/news/fingal-north-dublin-transport-study/

- In line with best international practice, include only those schemes within future year do-minimum scenarios that have full funding commitment, i.e. do not take them as a given, but instead objectively assess them alongside other options. In the absence of a Detailed (or even a Preliminary) Business Case, full funding commitment has not yet been secured for BRT, and it should therefore be excluded from future year do-minimum scenarios.
- Consider all options to address the identified priority challenges along the corridor. This should include the options listed on the Authority's website, and BRT. Furthermore increasing the population of Swords from 43,000 to 100,000 would massively increase transport demand on the north-south corridor transport to the City Centre. Should the cost to the exchequer of supporting this level of future population growth be considered unaffordable, the scale of planned future development in Swords may need to be revised.

Should the Authority proceed as proposed above, it is likely that an alternative cost-effective solution to address short, medium and longer term transport demand along the corridor may emerge, rather than delivery of two separate schemes as appears to be currently proposed.

3. Conclusions

3.1. Key Concerns

CTTC members are fully supportive of capital investment in areas that enhance public transport infrastructure and services, and support the potential role of BRT within an integrated transport network. They have however major reservations in relation to the Authority's current proposals for the Swords/ Airport to City Centre corridor. Key issues of concern are:

- The ***lack of Preliminary Business Case*** for the proposed scheme, and apparent inconsistency with the Authority's own Project Management Guidelines, which recommend its development at the earlier Scheme Concept and Feasibility phase of scheme development.
- The ***need for the proposed scheme*** is unclear, with no evidence provided to demonstrate current and future demand along the corridor, and specific transport related challenges arising.
- The current proposed scheme is deemed likely to be a ***contributory factor in Metro North status changing from 'deferred' to 'cancelled'*** due to the significant feasibility challenges of subsequently constructing Metro North and insufficient transport demand to warrant both schemes.
- ***Concerns in relation to the demand forecasting approach underpinning scheme development to date*** – issues which would have been expected to have been addressed as part of a Business Case, had it been developed. Key concerns include:
  - The appropriateness of the current linear growth forecasting approach between 2006 and 2033 – in the context of the near halt in development from 2008 onwards, this assumption is considered implausible. As such, demand up to 2032 is likely to be less than currently forecast.
  - Apparent assumption that the levels of future development as envisaged within the *'RPGs'* and *'Fingal County Development Plan'* will be realised, i.e. population growth in Swords from 43,000 in 2011 to up to 100,000 in the longer term. Such growth is predicated on delivery of Metro North, and as no longer term demand modelling outputs have been provided, it is unclear that the implications of its delivery (delivered/ not delivered scenarios) have been considered in the demand forecasting approach pursued to date:
    - Should Metro North not be delivered, it may require a review of the scale of development along the Metro North corridor, capping its ultimate growth at a much lower level.

- Conversely, if Metro North is delivered, it would provide major competition for BRT, significantly reducing demand for the latter service.

- The demand forecasting issues raised above give rise to ***similar concerns in relation to the economic appraisal approach pursued to date***. In light of the Authority's assertion that the proposed BRT scheme shall perform *"an interim transport solution in the shorter term, pending the development of a higher capacity rail solution, such as a metro"* the rationale for a 30-year economic appraisal period is unclear. While appraising the scheme over a 30-year period is a valid approach, this is predicated on prior addressing of the demand forecasting issues identified above.
- In the absence of the Authority completing a financial analysis for the proposed scheme, ***the rationale for the Authority's proposal to issue a direct award contract to Dublin Bus to operate the services is unclear, and its timing appears premature***. The absence of full financial transparency within Dublin Bus risks placing this operator at an unfair commercial advantage in the market.
- The current proposed scheme is deemed likely to have a ***severe adverse impact on Swords Express operations*** during its construction and operational phases – a service which carries over 640,000 passengers per annum at no cost to the exchequer.
- ***The role of the private sector in meeting the challenges presented by future growth along the corridor does not appear to have been considered to date***. This could include, for example, enhanced commercial express services from Swords to the City Centre and Dublin Airport to the City Centre. Such options could play a valuable interim role in meeting increased future demand along the corridor.

3.2. Recommended Way Forward

In light of these issues, CTTC members recommend (and best practice would demand) that:

- Further scheme planning and design activities be halted pending completion of a Preliminary Business Case for the scheme; and
- Review short, medium and longer term transport related challenges along the Swords/ Airport to City Centre corridor in parallel, and consider the appropriateness of BRT alongside other options including enhanced bus services (Dublin Bus and private), light rail, metro and heavy rail. The ongoing Fingal/ North Dublin Transport Study may represent an appropriate opportunity to do, on the presumption that its assumption and scope are reviewed and expanded to include an assessment of all possible interventions.

Finally, CTTC also request that the Authority engage with existing commercial operators along the corridor of the proposed scheme to identify scope to enhance service provision in accordance with latent current and forecast future passenger demand. In the future, CTTC also emphasise the benefits of engagement with their members at an early stage in the planning of proposed transport schemes to identify commercially funded solutions, and where such solutions are not viable, in assessing the impacts on their operations.

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[redacted]

RE: Public consultation submission from Parnell Centre car park.

Dear sir/madam,

Please find enclosed a public consultation submission on behalf of Parnell Centre car park regarding the proposed Swords/Airport to City Centre Swiftway BRT scheme.

Yours sincerely,

Mark Feeney
General Manager Car Park Operations

Submission by

Parnell Car Park

To the

National Transport Authority

In relation to

THE PROPOSAL TO PROVIDE A SWIFTWAY SERVICE

Presented by Myles O'Reilly on behalf of Parnell Car Park
28 November 2014

[redacted]

Introduction

Parnell Car Park is contained in the Parnell Centre. The car park has a capacity for 500 cars.

The car park is operated by Park Rite (Block A1, East Point Business Park, Dublin, 3).

Entry to the car park is from Parnell Street/Ryder's Row/ Loftus Lane. Exit is from Loftus Lane/Kings Inns /Parnell Street.

Background to Submission

The NTA published plans in early 2014 to introduce a Swiftway service for the route from Swords to St Stephen's Green and for routes from Clongriffin to Tallaght and Blanchardstown to UCD in Belfield. All three routes would be through the city centre.

On 14 October, 2014 the NTA published its route proposals for the Swords/St Stephen's Green route.

Park Rite has examined the 14 October proposals in detail and believes the proposals will damage its Parnell car park business as well as other businesses in Parnell Street, Moore Street, Capel Street and the general Henry Street/Mary Street retail area of North Dublin City bounded by O'Connell Street, Parnell Street, Capel Street and the North Quays.

Specifically, Park Rite finds the following difficulties with the proposals:

1. *Cars will be restricted from travelling from Gardiner Street along Parnell Street (east) to cross the top of O'Connell Street by the Parnell monument to get to Parnell Street (west).*

The reason why they will be almost unable to travel through the junction is because the Cavendish Row/Parnell Street/O'Connell Street junction will be dominated by:

- The Luas Cross City service (LCC) which will have two tracks crossing through the junction with traffic light priority (TLP)
- The Swiftway buses – traveling north and south-will cross through the junction and also have TLP
- Other buses, taxis and coaches–travelling north and south- will cross through.

It will not, therefore, be practicable for cars to get through this junction. This seems to be part of a policy of discouraging car drivers from accessing the area.

2. **Cars will be prohibited from travelling down North Frederick Street/Parnell Sq. East/Cavendish Row to Parnell Street**

This source of customers for the Parnell Street area will be ended.

3. **Cars will be prohibited from entering Gardiner Street from Dorset Street**

Cars will be diverted to Belvedere Road and will need several turns to get into Parnell Street. They will then be unable to get through to Parnell Street west.

4. Cars will not be able to travel up O'Connell Street and turn left on to Parnell Street (west)

The maps provided by the NTA show that, effectively, no cars are being allowed travel up O'Connell Street except for access to the car park in Prince's Street. We hope that there may be an error on the map but until we receive written confirmation of an error, we must assume that no cars are being allowed up O'Connell Street to Parnell Street.

Importance of Gardiner Street traffic

Gardiner Street is an access route to Parnell Street for traffic from the South of Dublin.

It is also used by Northern traffic (M1-Dublin Airport, Swords, Meath, and Belfast etc.)

Importance of Parnell Street (west)

The street is now an important retail and leisure area in the north of the city. In addition, Moore Street, Henry Street, Mary Street and Capel Street depend on Parnell Street traffic for car-user customers.

The North City retailers compete with suburban shopping centres such as the Pavilion in Swords, Santry, Blanchardstown, and Liffey Valley etc.

Suburban centres have easy access to car parking and often good public transport. If access to car parking is too difficult and requires too long journeys because cars are excluded from the centre city retail areas, then shoppers will travel to suburban centres. The retail trade and its rate-paying capacity will decline.

In these circumstances, we will be in a vicious circle whereby the numbers of retail employees commuting to the city will also decline. Swiftway will then not be needed to get commuters to work. Cities can decline because of wrong decisions being made on traffic movements.

Conclusions

Park Rite is broadly in favour of public transport and recognises the need for buses, cyclists and pedestrians to co-exist with motorists.

Park Rite believes, however, that the Swiftway project should not proceed and that the proposed changes to the streets should not take place. Park Rite believes that bringing a Swiftway service through a medieval city like Dublin will inevitably have serious consequences for the city and its many businesses.

Even if Swiftway is introduced, it does not need to cross the city and does not need to go down O'Connell Street. There are alternative routes. The route proposals for Swiftway are part of a wider Traffic Management Plan which has not yet been published.. It is very

difficult for Park Rite to comment on the route proposals without seeing the Traffic Management Plan, of which the Swiftway plans are a part.

In particular, Park Rite is concerned with the proposal that traffic would not be permitted to travel up O'Connell Street to Parnell Street and with the difficulty that cars will have in traversing the junction at the top of O'Connell Street to get from Parnell Street east to Parnell Street west.

Park Rite is also aware that there are plans for Swiftway routes from Blanchardstown and Clongriffin for which the route proposals have not yet been published and which could affect Western and Southern traffic entering the city centre.

Park Rite, therefore, calls for:

- the abandonment of Swiftway, or,
- a decision to terminate the Swiftway routes outside the city centre retail areas, as is done with European BRT Systems

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[redacted]

RE: Public consultation submission from Ilac car park.

Dear sir/madam,

Please find enclosed a public consultation submission on behalf of Ilac car park regarding the proposed Swords/Airport to City Centre Swiftway BRT scheme.

Yours sincerely,

Mark Feeney
General Manager Car Park Operations

[redacted]

Submission by

ILAC Centre Car Park

To the

National Transport Authority

In relation to

THE PROPOSAL TO PROVIDE A SWIFTWAY SERVICE

Presented by Myles O'Reilly on behalf of the ILAC Centre Car Park

[redacted]

[redacted]

Introduction

The ILAC Centre is bordered by Jervis Street, Mary Street/Henry Street, Moore Street and Parnell Street. The ILAC Shopping Centre is jointly owned by Chartered Land and Irish Life plc.

The car park has a capacity for 1000 cars and is owned by Dublin City Council.

The car park is operated by Park Rite (Block A1, East Point Business Park, Dublin 3)

Entry to, and exit from, the car park is on the south side of Parnell Street.

Background to Submission

The NTA published plans in early 2014 to introduce a Swiftway service for the route from Swords to St Stephen's Green. On 14 October, 2014 the NTA published its route proposals.

Park Rite has examined these proposals and believes the proposals will damage its car park business as well as other businesses in Parnell Street, Moore Street, Capel Street and the general Henry Street/Mary Street retail area of North Dublin City bounded by O'Connell Street, Parnell Street, Capel Street and the North Quays.

Specifically, Park Rite finds the following difficulties with the proposals:

1. ***Cars will be restricted from travelling from Gardiner Street along Parnell Street (east) to cross the top of O'Connell Street by the Parnell monument to get to Parnell Street (west).***

The reason why they will be almost unable to travel through the junction is because the Cavendish Row/Parnell Street/O'Connell Street junction will be dominated by:

- The Luas Cross City service (LCC) which will have two tracks crossing through the junction with traffic light priority (TLP)
- The Swiftway buses – traveling north and south-will cross through the junction and also have TLP
- Other buses, taxis and coaches–travelling north and south- will cross through.

It will not, therefore, be practicable for cars to get through this junction. This seems to be part of a policy of discouraging car drivers from accessing the area.

This car park is already experiencing a decline in customer numbers caused by the Luas Cross City works which are causing delays and traffic congestion. The decline in numbers demonstrates how sensitive customers are to changes to traffic management measures.

2. ***Cars will be prohibited from travelling down North Frederick Street/Parnell Sq. East/Cavendish Row to Parnell Street***

This source of customers for the Parnell Street area will be ended.

3. Cars will be prohibited from entering Gardiner Street from Dorset Street

Cars will be diverted to Belvedere Road and will need several turns to get into Parnell Street. They will then be unable to get through to Parnell Street west.

4. Cars will not be able to travel up O'Connell Street and turn left on to Parnell Street (west)

The maps provided by the NTA for Swiftway show that, effectively, no cars are being allowed to travel up O'Connell Street except for access to the car park in Prince's Street. It is very difficult for Park Rite to make a full assessment of the difficulties that will be faced by the ILAC Centre car park in the absence of the Traffic Management Plan.

Importance of Gardiner Street traffic

Gardiner Street is an access route to Parnell Street for traffic from the South of Dublin.

It is also used by Northern traffic (M1-Dublin Airport, Swords, Meath, and Belfast etc.)

Importance of Parnell Street (west)

The street is now an important retail and leisure area in the north of the city. In addition, Moore Street, Henry Street, Mary Street and Capel Street depend on Parnell Street traffic for car-user customers.

The North City retailers compete with suburban shopping centres such as the Pavilion in Swords, Santry, Blanchardstown, and Liffey Valley etc.

Damage to Parnell Street Area and to ILAC Centre car park

The Swiftway proposals for the bus to travel through the centre of Dublin City and, in particular, for it to travel down O'Connell Street will severely damage the city and in particular the Parnell Street area. Consequently, the ILAC centre car park will, inevitably, suffer a decline in customer numbers.

Park Rite calls upon the NTA not to proceed with Swiftway or if it does so, to remove it from O'Connell Street corridor.

Conclusions

1. The ILAC Centre car park will be gravely affected if the Route Proposals for Swiftway are implemented.
2. It is essential that the Traffic Management Plan be published as soon as possible.
3. Park Rite would like to meet the National Transport Authority to difficulties that will arise.

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RE: Public consultation submission from Abbey Street car park.

Dear sir/madam,

Please find enclosed a public consultation submission on behalf of Abbey Street car park regarding the proposed Swords/Airport to City Centre Swiftway BRT scheme.

Yours sincerely,

Mark Feeney
General Manager Car Park Operations

[redacted]

Submission by

Abbey Street Car Park

To the

National Transport Authority

In relation to

THE PROPOSAL TO PROVIDE A SWIFTWAY SERVICE

Presented by Myles O'Reilly on behalf of the Abbey Street Car Park

[redacted]

[redacted]

Introduction

The Abbey Street Car Park is situated on Abbey Street, Dublin 2. The car park has a capacity for 340 cars.

The car park is managed, on behalf of Canada Life/Irish Life by Park Rite (Block A1, East Point Business Park, Dublin, 3).

Background to Submission

The NTA published plans in early 2014 for three Swiftway routes from Swords, Clongriffin and Blanchardstown. All routes are planned to go through the city centre.

On 14 October, 2014 the NTA published its route proposals to introduce a Swiftway service for the route from Swords to St Stephen's Green.

Park Rite has examined these proposals and believes they will damage the Abbey Street car park business as well as other retail and commercial businesses and organisations in the area to the east of O'Connell Street, while it will make it more difficult for shoppers to access the West of O'Connell Street shops in Henry Street and Mary Street.

Importance of Irish Life Car park

The Abbey Street car park is beside the very important transport hub of Connolly Station/Busaras/Luas Red line and Luas Cross City.

It provides a car parking service for businesses on the East side of O'Connell Street including Irish Life Assurance, the VHI, and The Food Safety Authority of Ireland as well as hotels and the Abbey Theatre. It is also favoured by many persons who shop in the Henry Street/Mary Street area.

The Abbey Street Car Park is a critical part of Dublin's infrastructure. It is important that entry and access to the car park be facilitated.

Routes to and from the Abbey Street Car park

Entry to the car park is from Abbey Street but since the Luas Cross City track laying on Marlborough Street at the Abbey Theatre, it is necessary for traffic from the south of the city to access the car park via Batchelor's Walk, O'Connell Bridge or Butt Bridge and onwards to Gardiner Street/Talbot Street/ Marlborough Street/ Abbey Street.

Clearly, these routes which were introduced this year because of Luas Cross City works, make access very difficult, particularly for those who do not know the area.

Traffic from the North of the City can access from Gardiner Street/Talbot Street/Marlborough Street/Abbey Street or via Parnell Street/Marlborough Street/Abbey Street.

Traffic from the west of the city can go down the north quays and then to Beresford Place/Gardiner Street/Talbot Street/ Marlborough Street/ Abbey Street.

The exit from the car park is from Beresford Lane to left on Lower Gardiner Street. It is then necessary to turn left on to Talbot Street/Marlborough Street/ Eden Quay/Beresford Place and to:

- Gardiner Street for North side traffic, or,
- Talbot Memorial Bridge/Moss Street/City Quay/Lombard Street for South side traffic, or
- Talbot Memorial Bridge/Moss Street/Burgh Quay/Aston Quay for West side traffic.

Difficulties arising from Luas and Proposed Swiftway Service

Luas Cross City has already caused changes to the long established routes that customers take to the car park.

North-side cars

The Swiftway proposals provide that access from Dorset Street to Gardiner Street will be prohibited. Cars will instead have to turn left at Belvedere Road then join Gardiner Street at Mountjoy Square.

West-side Cars

West-side cars already have to enter via Talbot Street because they are unable to go through Marlborough Street to Abbey Street.

The difficulty for West-side cars will, if Swiftway proceeds as proposed in the route map, be in crossing from Batchelor's Quay through O'Connell Street to Eden Quay.

This difficulty will be caused by:

- BRT lanes- north and south
- Other buses/Coaches/Taxis
- One Luas Cross City track.

This difficulty can be overcome by an underpass between Batchelor's Quay and Eden Quay to keep public and private transport moving at this intersection.

South-side Cars

Prior to the Luas Cross City works in Marlborough Street, South-side cars were able to access the Abbey Street entrance by travelling via Pearse Street/Tara Street/ Burgh Quay/O'Connell Bridge/Eden Quay/Marlborough Street/Abbey Street.

Following submissions by Park Rite and other parties, it was agreed to retain a right hand turn from O'Connell Street to Eden Quay. However, the Swiftway maps have removed the right hand turn.

The above route will therefore be closed to South-side traffic wishing to access Abbey Street Car Park.

SUMMARY OF SUBMISSION TO THE NATIONAL TRANSPORT AUTHORITY

1. Park Rite, on behalf of the Abbey Street car park is very concerned with the potential effect that the Swiftway proposals, as specified in the route maps published on 14 October, might have on its client's car park and on the many businesses which the car park serves.
2. Park Rite calls upon the NTA to publish the Dublin Traffic Management Plan so that a full assessment can be completed.
3. Park Rite requests the NTA to either abandon its Swiftway project or to bring Swiftway only to the edge of the city and not through the city centre.
4. If Swiftway is to traverse the city, then underpasses connecting the quays on both sides of O'Connell Bridge should be constructed if Swiftway travels over the O'Connell Bridge.
5. Park Rite would like to discuss these proposals with the National Transport Authority.

CLARE DALY TD

Dail Eireann, Kildare Street, Dublin 2

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To Whom It May Concern, [redacted]

The proposed Swiftway/Bus Rapid Transit system for Swords/Airport to the City Centre is a poor substitute for the long-promised but sadly now abandoned Metro North project. This is being done in order to create the illusion of an improvement in a public transport serving the area, but in fact its very implementation will contribute to ensuring a delay in any meaningful improvement. On behalf of the residents in the local community, I would like to highlight that the root of this problem is, the absence of a rail link between the Dublin Airport/Swords and the City Centre. I am delighted for the people of Dundrum and other parts of the Southside of the city that they have the benefits of using the fast, efficient and clean Luas, and hope that someday the people of the Northside will equally enjoy such a service. Implementing Swiftway sets back that goal.

I welcome the fact that the initial consultation period resulted in a rejection of the proposed route going through Pinegrove. This reflects the very serious and determined campaign put forward by the local community to object to that initial proposal. However, it is not good enough to listen to the concerns of one section of the community and then foist the problems onto the backs of another. I am particularly aggrieved at the fact that the consultation period this time round is shorter and that the advertising campaign would appear to be very much inferior to the first round of the process. I trust that this will be rectified.

CLARE DALY TD

Dail Eireann, Kildare Street, Dublin 2

UNITED LEFT **Phone:** 01 6183390 **Email:** clare.daly@oir.ie **www.claredaly.ie**

Having received numerous communications from people living in the area whom I represent, I have some concerns and am happy to support the views of the residents. My objections to the proposed route are summarised overleaf and I strongly urge the National Transport Authority to address them.

I find it hard to see how the initiation of this bus system which will be implemented at considerable inconvenience to the local community, will have any improvement on the access into the city centre for Swords residents , in the context that the Swords Express already exists. It achieves times similar to those being proposed by Swiftway and in essences the arrival of Swiftway may simply result in the elimination of that service to the detriment of those who presently use it. I find it very hard to justify this proposition for all of the reasons outlined.

I look forward to hearing from you.

Regards,

Clare Daly TD

0612

OBJECTIONS TO THE PLANNED SWIFTWAY ROUTE THROUGH RESIDENTIAL AREAS IN SWORDS

1. Removal of amenities

- The removal of the Skate Park, Balheary Park is unconscionable as it is enjoyed by large numbers of children and teenagers from the area and residents worked hard for it to be built. Such amenities are very important for children and young people, and I object to this particular aspect of the plan in the strongest terms. I note that the local authority has said that in the event of the proposal going ahead that the skate park will be relocated, however, going on previous experience, this would not inspire me with confidence and the idea of the community being without this amenity for any time whatsoever is unacceptable.
- The reduction of green space at Glen Ellan Park by up to 8 metres at certain points is very concerning, especially considering the amenity is used by families, walkers and joggers etc. all day, every day, including in winter
- I also question the foresight that has gone in to the removal of approximately 50 car parking spaces outside the two schools (Gaelscoil Bhrian Boroimhe and Swords Educate Together). This will cause serious problems for parents and there doesn't appear to be any plans to provide suitable alternative parking options, despite the fact that up to 900 children attend both schools on any given day
- The felling of trees, along with the removal of green spaces, will negatively affect the aesthetics of the local environment. The lengthy construction process will also impact on the quality of life of local residents

2. Traffic implications

- Replacing all the roundabouts with wider junctions and traffic signals prioritising Swiftway will result in major traffic implications on an already congested route
- The introduction of traffic lights at the Applewood/Bridesglen roundabout will severely restrict the ability of motorists from Sandford Wood and Glen Ellan to exit their estate safely through the only exit available
- The introduction of traffic lights at the junctions on the Swords bypass will cause significant delay and disruption to local people as they travel around Swords and into the city centre and on to the M50. It is ironic that traffic lights are being imposed on this route at the same time as tens of millions are being expended on delivering a free flow operation at Newlands Cross.
- Pedestrianising Jug Back Lane will result in a major bottleneck when students are being dropped off and collected at St Finian's Community College. It may also become a potential black spot for anti-social behaviour. This idea was part of a public consultation process previously initiated by Fingal County Council and was overwhelmingly rejected by residents at the time.
- Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of bus services already operating in the area
- Without a park and ride facility, a major concern is the potential for commuters to drive into estates along the proposed routes and leave their cars there all day, depriving residents of parking, congesting their outdoor space and reducing their quality of life

3. **Safety for children and other pedestrians**

- The removal of grass margins along Glen Ellan Road will result in children walking in close proximity to traffic. This is of particular concern approaching the three local primary schools
- The construction of the roadway itself will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan, Sandford Wood, Applewood, Castleview, Brides Glen, Bunbury Gate & South Bank areas
- Significant issues and concerns relating to the safety of children, pedestrians and cyclists due to the regularity of the new vehicles, particularly at junctions that are intersected or impacted by Swiftway
- Removing the pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords

Clare Daly, TD

[redacted]

JSA John Spain Associates
Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

[redacted]

50 Upper Mount Street
Dublin 2

Tel 01 662 5803
Fax 01 676 6374
info@johnspainassociates.com
www.johnspainassociates.com

Swiftway BRT - Swords/Airport to City Centre Proposed Scheme Consultation'
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

[redacted]

Dear Sir / Madam,

RE: SUBMISSION ON BEHALF OF HIGHFIELD HEALTHCARE, SWORDS ROAD, WHITEHALL, DUBLIN 9 IN RESPECT OF THE PROPOSED SWIFTWAY BRT – SWORDS/AIRPORT TO CITY CENTRE

On behalf of our client, J & M Eustace, Highfield Healthcare, Swords Road, Whitehall, Dublin 9, we wish to make a submission on the proposals for the Swiftway BRT – Swords/Airport to City Centre proposed scheme.

Our client has no objection in principle to the proposed Swiftway BRT Swords/Airport to City Centre scheme. The preferred route for the scheme includes Swords Road in Whitehall, directly opposite our client's lands. However, our client is concerned in relation to the potential permanent and temporary landtake that may be required to facilitate the scheme and the impact that this may have upon our client's lands.

The lands at Highfield Healthcare measure approximately 4.03 hectares and are located to the east side of and adjoining the Swords Road, Whitehall, Dublin 9. The lands are roughly rectangular in shape.

The Highfield Healthcare lands are occupied by Highfield Private Hospital, Hampstead Clinic and the Alzheimer's Care Centre. The site also accommodates surface car parking and associated internal distributor roads and is accessed from Swords Road. The location of our client's lands is identified overleaf.

Figure 1: Site Location (site outline approximate only – note that the car parking area to the north-west corner which is under construction in this image has now been completed)
Source: Bing Maps

The road layout at this location currently comprises of a four lane road accommodating a bus lane in each lane, and a footpath on each side of the road. The footpath on the west side of the road incorporates a cycle path.

In order to accommodate the BRT, the following is proposed:

- Two traffic lanes
- Two bus lanes
- Two cycle lanes
- Two footpaths

A comparison of the existing and proposed arrangement is illustrated below on an extract from scheme drawing BRT-0121. The proposals would result in an increased total width at this location of 2.95 metres.

It is understood from initial discussions between Highfield Healthcare and the NTA that permanent landtake from Highfield Healthcare will be a minimum of 2 metres and that a further 2 metres of temporary landtake may be required to facilitate construction.

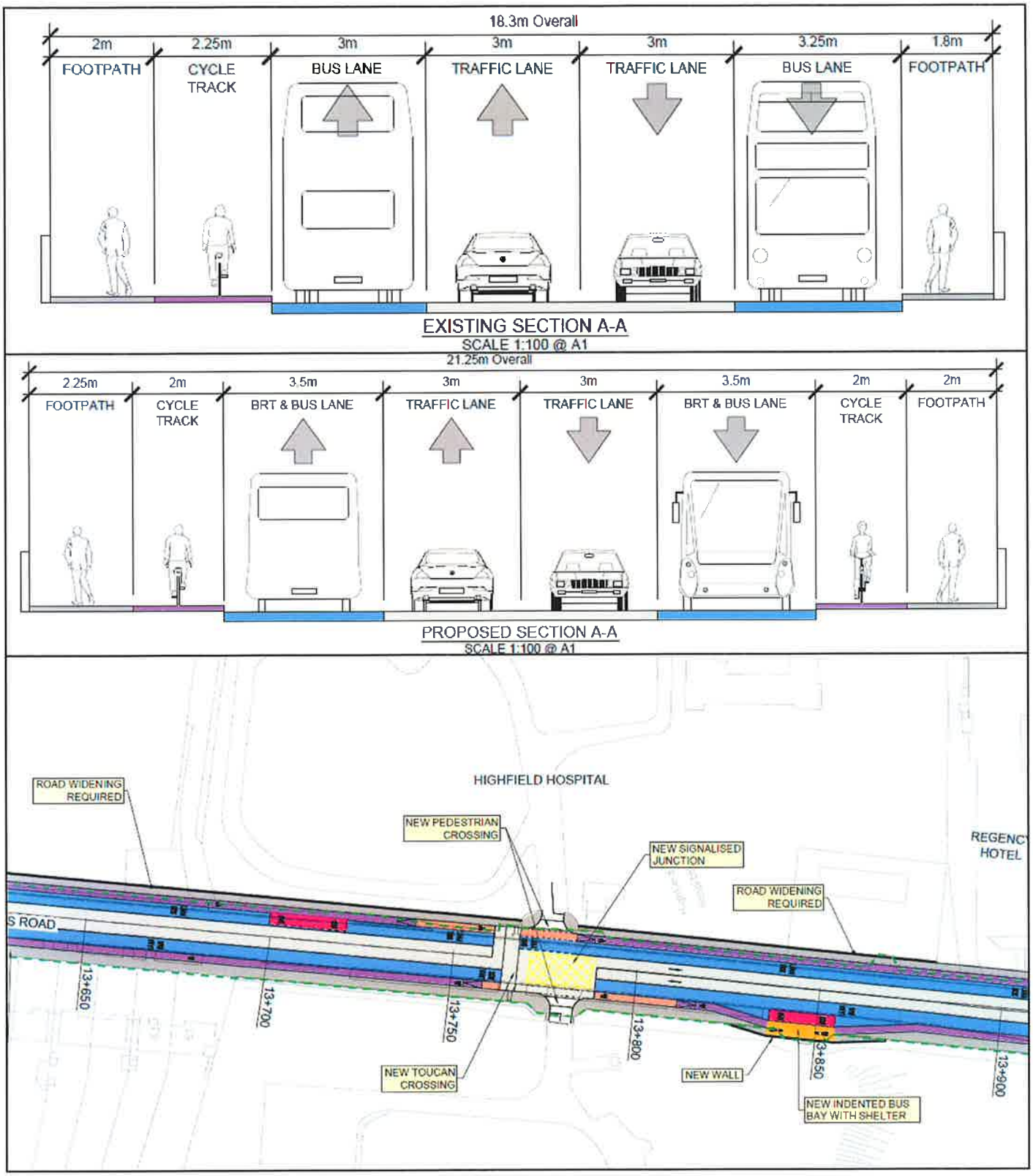

Figure 2: Extracts from scheme Dwg. No. BRT-0121

Drawing No. BRT-0121 indicates that all road widening required will take place on the east side of the road. This will require permanent land-take from our client's lands. Whilst the extent of land-take required is not provided on this drawing or in other available documentation, it is reasonable to assume that up to 2.95 metres of permanent land-take may be required along the full frontage of our client's lands to Swords Road. The extent of temporary landtake that may be required is unclear, but may be 2-3 metres.

There appears to have been no assessment of the impact that this permanent and temporary landtake would have on our client's lands. It is considered that the permanent landtake alone would result in the loss of an important planted boundary at Highfield Healthcare and the loss of up to 14 no. car parking spaces which are located close to the western boundary of our client's lands, to the south-western corner of their lands. 3 no. spaces located further to the north may also be affected.

The planted boundary to the Swords Road is an essential element of the site and provides for the security and privacy of the patients and staff of the hospital. There are no details in relation to the number of trees that would be lost and proposed replacement boundary treatment.

Furthermore, there is a gate lodge built in the early 1700 located immediately to the south of the entrance to the Highfield Healthcare lands, which would be markedly affected by the proposals.

It is apparent that a 3 metre landtake, and even a lesser landtake of circa 2 metres, would have a significant adverse impact.

The permanent landtake that would be required to accommodate the scheme is considered to be excessive and would severely impact upon our client's lands and the operation of the hospital on the lands.

Having regard to the above, it is respectfully submitted that the NTA give consideration to revised proposals which reduce the impact on our client's lands. Such proposals may include the delivery of a cycle path on one side of the road only and / or reduction in widths of the bus, cycle and traffic lanes.

It is further considered that any requirement for temporary compulsory acquisition of our client's lands can be avoided by appropriate traffic management measures during construction which allow the contractor to work from the road, rather than from our client's lands.

It is respectfully requested that these issues be taken into account by the NTA in the evolution of the scheme proposals.

Yours faithfully,

John Spain Associates

[redacted]

See attached the NRA submission on the Swords to City Centre Swiftway. I also submitted this through your website portal.
My colleagues from different sections within the NRA and I have had input into this submission.
We are available to meet with your project team at any time.

Regards,
Helen

Helen Hughes
Senior Project Manager (Strategic Planning)
National Roads Authority

| Tel: +353 1 6602511 | Tel: +353 1 665 88823 (Direct line)
National Roads Authority, St Martin's House, Waterloo Road, Dublin 4, Ireland

[redacted]

NRA
An tÚdarás um Bóithre Náisiúnta
National Roads Authority

Mr. David King
National Transport Authority
Harcourt Lane
Dublin 2

Teach Naomh Máirtín, Bóthar Waterloo, Baile Átha Cliath 4
St Martin's House, Waterloo Road, Dublin 4
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[redacted]

Ár dTag: / Our Ref: Bhur dTag: / Your Ref:

Re: Swords to City Centre Swiftway BRT proposal on N50 National Primary Road

Dear Mr. King,

We note that the proposed Swords to City Centre BRT is located on the N50 National Primary road between the Coolock Junction and Collins Avenue Junction and our observations relate to this section of the route only. Please also consider the contents of the attached letter which the NRA sent on March 13th as part of this submission. The contents of this letter relate to all BRT proposals where they interface with National Roads and are therefore relevant to the Swords to City BRT.

This submission raises the following issues which are of concern to the Authority as follows;

1) Impact of the BRT proposal on the Coolock Rotary Junction

2) Impact of the BRT proposal on the Shantalla Bridge half diamond junction

3) Introduction of a bus stop each side of the N50 at Shantalla Bridge

1 <u>Coolock Interchange</u>

The Authority would not countenance any measures that would significantly diminish the capacity of the Coolock Junction. We would not approve dedicating one lane of the northern arm of the rotary to a BRT lane.

The Authority received the Technical Note prepared by Arup, dated 14th November 2014 on the Junction Assessment of Coolock Junction with the Swiftway BRT scheme. The detailed results of the LinSig assessment imply that there will be AM peak queuing back from the "bus gate" junction to the west of the Coolock junction into the interchange itself. The results also imply that there would be AM peak queuing on the southern arm of the rotary back to the junction at the eastern arm / southbound on-ramp / Coolock Lane East. A stand-alone LinSig analysis cannot adequately represent this scenario where blocking back occurs between junctions/traffic signals.

The plan drawing of the northbound slip road to the Coolock Junction indicates that this slip road has been narrowed between Chainage 12150 and 11900, close to the Port Tunnel. We would require confirmation that there is no encroachment on the Port Tunnel in this location, as safeguarding the integrity of the tunnel is essential. Please provide details of the width of the slip road at this location.

2 Shantalla Bridge Junction

The Authority would require a traffic assessment also of the Shantalla Bridge Junction because of the new layout of the northbound off ramp to Santry. The drawings indicate that the existing dedicated left turn lane (northbound) between Collins Avenue and Shantalla Bridge will be replaced by a new BRT lane. A limited diverge length is now provided on the N50 northbound to Santry at this junction, which involves diverging across BRT vehicles / buses. The impact of this proposal requires assessment.

All of the above suggest that a corridor micro simulation assessment of the N50/R132 from south of Collins Avenue to north of the Coolock junction is required. The assessment should include all junctions such as Collins Avenue, Shantalla Bridge and the full Coolock interchange (including the proposed new "bus gate" junction and the junction at Coolock Lane / Santry Aveune). This should provide a better understanding of the potential impacts of the BRT on the national road network in this location both in the 2014 base year and forecast to an agreed future year.

3 Bus stops at Shantalla Bridge

A further concern to the Authority is the introduction of bus-stops on the three lane section of the N50 at Shantalla Bridge. The NRA traffic counter 1013 is located north of the Shantalla Junction close to the proposed bus stop location and indicates an AADT of 41817 in 2014. We would have concerns about pedestrians crossing the N50 even though the option for using the over bridge is available. In any event a Road Safety Audit would be required on the N50. Finally we would draw your attention to the requirements for Road Safety Impact Assessment (RSIA) in accordance with EU directive 2008/976/EC, SI 472 of 2011 and standard NRA DMRB HD18 on the TENT network.

In summary the Authority is unable to support the proposal as submitted and requires further assessment work to be carried out. I look forward to hearing from you.

Yours sincerely,

Helen Hughes

Helen Hughes

Senior Project Manager

Strategic Planning

NRA
An tÚdarás um Bóithre Náisiúnta
National Roads Authority

[redacted]

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Rphost / Email: info@nra.ie **Idirlíon / Website:** www.nra.ie

Dáta / Date: [redacted]

Ár dTag. / Our Ref.

Bhur dTag. / Your Ref.

[redacted]

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Helen Hughes

Helen Hughes

Senior Project Manager

Strategic Planning

An tÚdarás um Bóithre Náisiúnta
National Roads Authority

BRT Consultation
National Transport Authority
Dún Scéine
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[redacted]

Ár dTag. | Our Ref.
NRA14-89679

Bhur dTag. | Your Ref.

Re: Bus Rapid Transit Public Consultation

Dear Secretary,

Further to notice of consultation with regard to the NTA's plans for a future "Swiftway" Bus Rapid Transit, the Authority would highlight that the DoECLG's Statutory Planning Guidelines on Spatial Planning and National Roads (January, 2012) highlight the need for early engagement and dialogue between the NRA and agencies, in respect of devising appropriate strategies for managing plans and proposals within the broader context of the national road networks functions and operation.

The Authority recognises that BRT is a major component of city transport systems worldwide and would provide an attractive alternative to car transport, with fast and reliable journey times, and will hopefully form a key part of Dublin's overall public transport system. The system proposed appears to be located in a number of areas which coincide with the national road network, in particular the M50, its interchanges and associated national routes.

It is the view of the Authority that it is essential that any plan which could impact on the M50 motorway, its junctions, and the national routes concerned recognises the need to ensure the maintenance and protection of the safety and efficiency of national roads given their central role in catering for business travel and movement of goods to key markets, ports and Dublin Airport. In this regard, the Authority would strongly encourage close collaboration on the development of the system in instances where the interfaces of both networks coincide. The National Roads Authority recommends the following issues be considered/undertaken to facilitate the "Swiftway" BRT future plans:

- Demonstration that all other options for servicing the proposals needs are considered and, in particular, the regional and local roads network have been examined and exploited to the fullest extent practicable;
- Demonstration of the impacts of the BRT on the national road network both on year of opening and future years. The appropriate traffic modelling should be determined in consultation with the NRA;
- Any implications for the safety, capacity and efficient operation of national roads and all road users;
- Demonstration that design complies with NRA Design Manual for Roads and Bridges (NRA DMRB) standards;
- Satisfactory details of the proposed traffic and demand management measures;
- Plans for future upgrades of national roads and other transport infrastructure/services;
- Acceptable funding and delivery proposals for any road improvements/structure required.

The NTA is also reminded of the requirements of NRA DMRB BD 2 - Technical Approval of Road Structures on Motorways and Other National Roads for structures. This Standard specifies the procedures to be followed in order to obtain Technical Acceptance for structures on motorway and other national road schemes and for the submission of as built records. The procedures cover the design of all road structures, including bridges, tunnels, subways, culverts, buried corrugated steel structures, retaining walls, reinforced earth structures, gantries, environmental noise barriers and temporary structures under or over motorways or other roads carrying public traffic. The Technical Acceptance requirements, if any, for the assessment, alteration, modification, strengthening and repair of all road structures affected by national road schemes shall be agreed with the Bridge Management Section of the National Roads Authority (NRA).

Finally, the Authority advises that the NTA should be aware that the Road Infrastructure Safety Management Directive (EU DIRECTIVE 2008/96/EC) was adopted in November 2008 and came into force in December 2010. It was transposed into Irish law by Statutory Instrument S.I. No. 472/2011, entitled 'European Communities (Road Infrastructure Safety Management) Regulations 2011'. The Directive applies to all roads which are part of the Trans-European Road Network (TERN) at design stage, under construction or in operation.

The Directive requires the establishment and implementation of a number of procedures, including Road Safety Impact Assessments. A road safety impact assessment involves a strategic comparative analysis of the impact of a new road or a substantial modification to the existing network on the safety performance of the road network, at the initial planning stage before the infrastructure project is approved. The purpose is to demonstrate, on a strategic level, the implications on road safety of different planning alternatives of infrastructure.

Conclusion

As indicated in Section 2.10, Providing for Public Transport, of the Department of the Environment Community & Local Government "Spatial Planning and National Roads Guidelines for Planning Authorities" though the operation and funding of public transport facilities is outside the normal remit of the NRA, subject to appropriate consultation and where the provision of such facilities is not to the detriment of the operation and safety of the national road infrastructure concerned, national roads infrastructure can support a shift towards more sustainable transport modes.

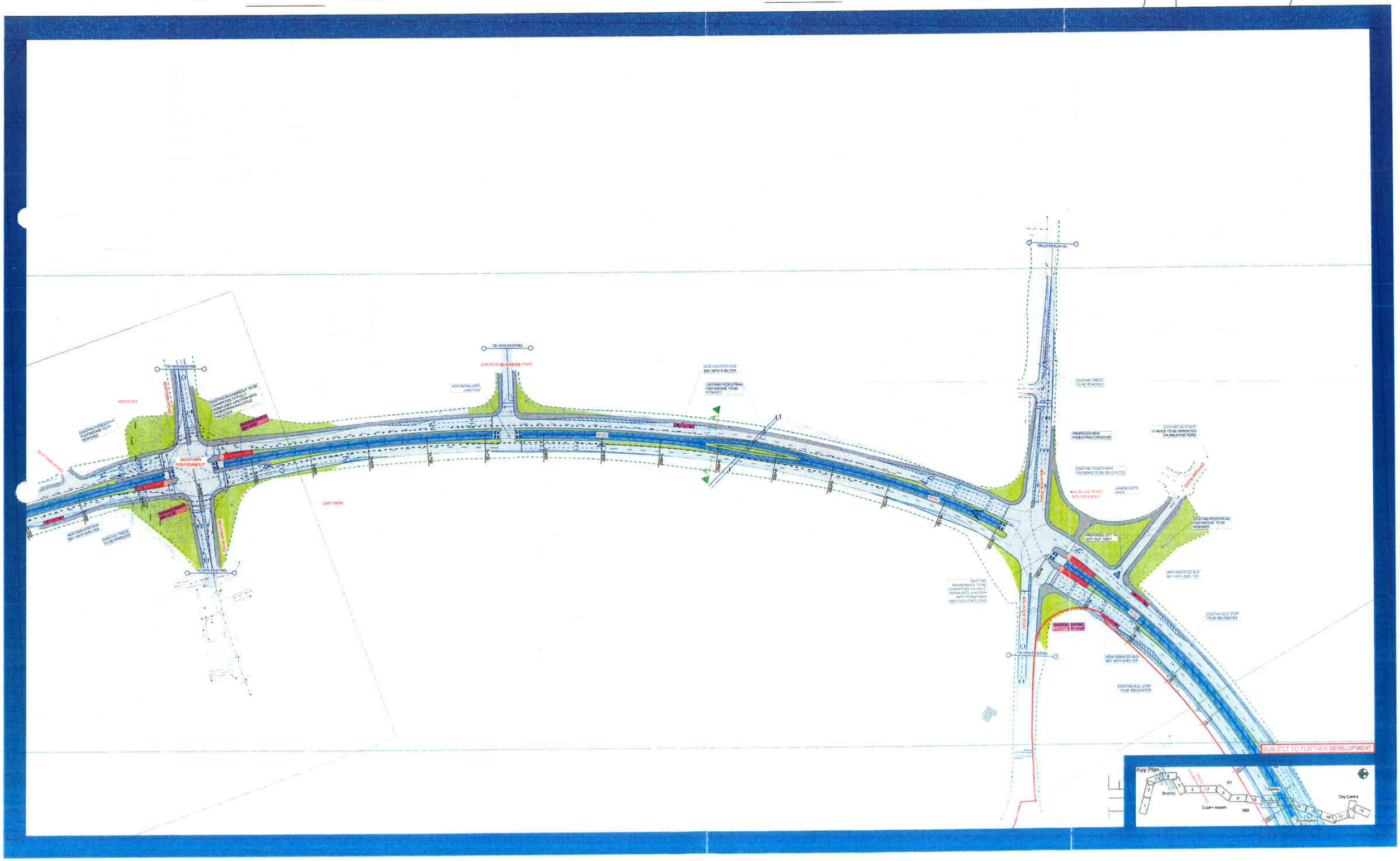
The Authority requests that the above comments are considered in the preparation of future BRT plans in order to protect the strategic investment that has been made in national roads, and also be in accordance with the DoECLG's Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

The Authority is willing to meet to further discuss the issues raised in this correspondence at your earliest convenience.

Yours sincerely,

Tara Spain
Senior Policy Adviser (Planning)

A0_Banner_001.jpg



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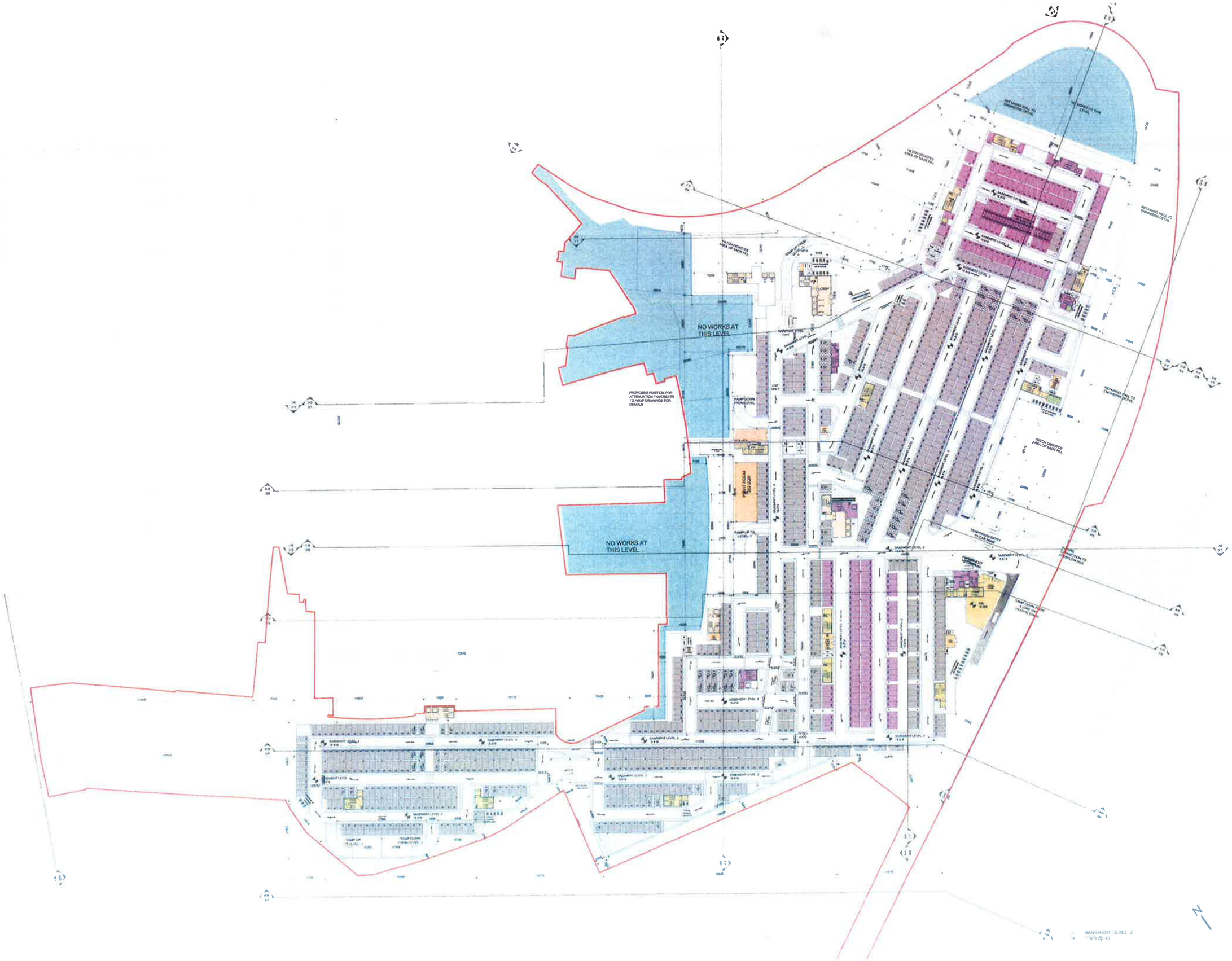

OVERALL KEY PLAN

Ordnance Survey of Ireland
Licence No. AR 0060 08 - MGE Architects
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Level Datum

Malin Head :- Poolbeg Assumed

LEVEL+10 Roof
LEVEL+9
LEVEL+8
LEVEL+7
LEVEL+6
LEVEL+5
LEVEL+4
LEVEL+3
LEVEL+2
LEVEL+1
LEVEL 0
LEVEL-1M
LEVEL-2
LEVEL-3

LEVEL+1M
LEVEL 0M

LEGEND

- ANCHOR UNITS
- RETAIL UNITS/ CIRCULATION CORES
- SERVICE RETAIL UNITS
- SERVICE AREA
- CAFE / RESTAURANT
- OFFICE
- RESIDENTIAL
- MEDICAL CENTRE
- COMMUNITY ROOMS
- ENCLOSED STREET
- OPEN STREET
- BACK OF HOUSE
- PLANT ROOMS
- CARPARKING SPACE
- NO WORK AT THIS LEVEL
- PEDESTRIAN WALK WAYS (CARPARK LEVELS)
- SITE BOUNDARY RED
- SITE BOUNDARY BLUE
- QUARTER BOUNDARY

NOTES

FOR LANDSCAPE DETAILS PLEASE REFER TO BERNARD SEYMOUR LANDSCAPE ARCHITECTS DRAWINGS

FOR ENGINEERS DETAILS PLEASE REFER TO MRUF DRAWINGS

DRAWING STATUS: PLANNING

	SWORDS PAVILIONS	DATE	28.07.2008
	PHASE 3	DRAWN	JR
	CHARTERED LAND LTD	SCALE	1:500@A0
	BASEMENT 2	CHECKED	MB
		DRG NO	A578-AE
		REV NO	JP-3-200

NMA

A1

10cm SCALE BAR CAUTION AS DISTORTED ON SCOUR

STAGE DIAGRAMS

STAGE DIAGRAMS

TRAFFIC SIGNAL LEGEND

- A — Phase Number
- 02 — Pole Number

SIGNAL INFRASTRUCTURE

- Proposed Straight 4m Signal Pole
- Existing Signal Pole

TRAFFIC SIGNAL HEADS

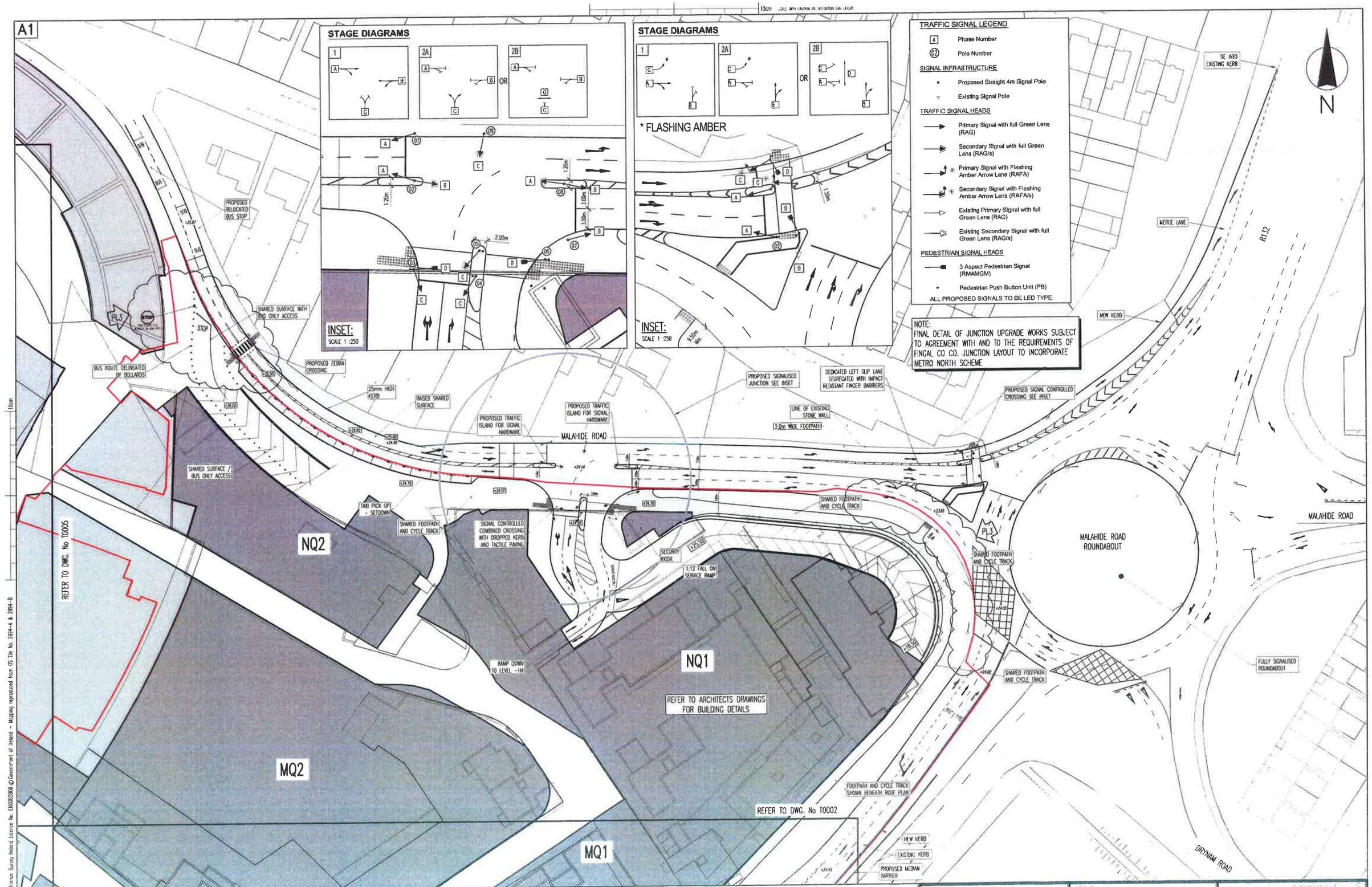
- Primary Signal with full Green Lens (RAG)
- Secondary Signal with full Green Lens (RAG/s)
- Primary Signal with Flashing Amber Arrow Lens (RAFA)
- Secondary Signal with Flashing Amber Arrow Lens (RAFA/s)
- Existing Primary Signal with full Green Lens (RAG)
- Existing Secondary Signal with full Green Lens (RAG/s)

PEDESTRIAN SIGNAL HEADS

- 3 Aspect Pedestrian Signal (RMAMGM)
- Pedestrian Push Button Unit (PB)

ALL PROPOSED SIGNALS TO BE LED TYPE

NOTE:
FINAL DETAIL OF JUNCTION UPGRADE WORKS SUBJECT TO AGREEMENT WITH AND TO THE REQUIREMENTS OF FINGAL CO CO. JUNCTION LAYOUT TO INCORPORATE METRO NORTH SCHEME



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PL3	GMcT	RFI ISSUE	GMcD
PL2	GMcT	RSA ISSUE	TO
PL1	GMcT	PLANNING ISSUE	SWJ

NOTES:

1. (TSM) – TRAFFIC SIGNS MANUAL (DOE) – 1996
   (PCT) – PROVISION OF CYCLE FACILITIES (DOE)
2. ALL ROADSIDE FURNITURE TO HAVE A MINIMUM CLEARANCE OF 0.5m FROM ROADSIDE EDGE OF FURNITURE TO FACE OF KERB
3. LANE INDICATION ARROWS TO BE INSTALLED IN ACCORDANCE WITH FIGURE 7.28 (TSM).
4. YIELD ROAD MARKING TRIANGLES TO BE INSTALLED IN ACCORDANCE WITH FIGURE 7.2 (TSM).
5. ALL ROAD MARKING TO BE 100mm WIDE UNLESS SPECIFIED OTHERWISE
6. ALL ROAD MARKING TO BE WHITE UNLESS SPECIFIED OTHERWISE.
7. THIS DRAWING TO BE READ IN CONJUNCTION WITH ALL RELEVANT SPECIFICATIONS AND ENGINEERING DRAWINGS.
8. ALL EXISTING ROAD MARKINGS WHICH CONFLICT WITH PROPOSED ROAD MARKINGS TO BE REMOVED.
9. ALL PROPOSED ROAD MARKINGS TO TIE IN WITH EXISTING.
10. EXISTING ROAD MARKINGS TO BE BURNT OFF AS INDICATED BY THE ENGINEER
11. WORKS EXTERNAL TO THE SITE SUBJECT TO AGREEMENT WITH FINGAL COUNTY COUNCIL
12. RED SURFACE MATERIAL TO ON ROAD CYCLE LANES BUS CAGES AND CONTROLLED PEDESTRIAN CROSSINGS TO BE EPOXY RESIN BASED MATERIAL TO CLAUSE 935.
13. ALL LEVELS RELATE TO OS DATUM, MALIN HEAD.

KEY:

(2.0-2.0-0.1) 2.0m LINE, 2.0m GAP, 0.1m WIDE LINE MARKING

+26.50 EXISTING LEVEL

26.50 PROPOSED LEVEL

PAVILIONS SHOPPING CENTRE
PHASE 3

CHARTERED LAND LTD

PROPOSED MALAHIDE ROAD
ACCESS LAYOUT

PLANNING

ARUP

1:500 @ A1 (1:1000 @ A3)			C.McTERNAN
SWJ	DMcD	19/11/08	
D5472.20	T0004		PL3

A1

10cm

N

NOTE:
FINAL DETAIL OF JUNCTION UPGRADE WORKS SUBJECT TO AGREEMENT WITH AND TO THE REQUIREMENTS OF FINGAL CO CO.

PROPOSED CONTROLLED PEDESTRIAN CROSSING WITH TACTILE PAVING AND DROPPED KERBS

DUBLIN STREET

FOREST ROAD

PARKING BAY TO BE REMOVED

EXISTING TREES TO BE REMOVED

EXISTING INSET PARKING TO BE RETAINED

PROPOSED 2.5m WIDE RIGHT TURN LANE

PROPOSED 2.8m THROUGH LANE

LEFT TURN OUT ONLY

TOP OF RAMP @ 26.50m

DUBLIN ROAD

PROPOSED SIGNALISED JUNCTION SEE INSET

PROPOSED CONTROLLED PEDESTRIAN CROSSING WITH TACTILE PAVING AND DROPPED KERBS

SEGREGATED ACCESS TO SERVICE YARD

PL3

YIELD

SIGN (FIGURE 5.3) MOUNTED ON NEW POST

BOTTOM OF RAMP @ 26.50m

SERVICE YARD ACCESS CONTROL

ACCESS RAMP TO SERVICE YARD AT 1:30 GRADIENT

STOP

SIGN (FIGURE 5.2) MOUNTED ON NEW POST

EXISTING MSCP

SEE INSET FOR LEVEL -1 DETAIL

RAMP TO +1 LEVEL FOR EMERGENCY VEHICLES ONLY

RAMP TO +1 LEVEL FOR EMERGENCY VEHICLES ONLY (SHOWN DASHED)

EXISTING SERVICE YARD

EXISTING SERVICE YARD

REFER TO ARCHITECTS DRAWINGS FOR BUILDING DETAILS

SQ1

SQ2

TRAFFIC SIGNAL LEGEND

A — Phase Number

02 — Pole Number

SIGNAL INFRASTRUCTURE

- Proposed Straight 4m Signal Pole

TRAFFIC SIGNAL HEADS

- Primary Signal with full Green Lens (RAG)
- Primary Signal with additional Green Arrow Lens (RAGGA)
- Secondary Signal with additional Green Arrow Lens (RAGGA/s)
- Secondary Signal with Amber Green Arrow Lenses (RAGGAA/s)
- Primary Signal with Flashing Amber Arrow Lens (RAFA)
- Secondary Signal with Flashing Amber Arrow Lens (RAFA/s)

PEDESTRIAN SIGNAL HEADS

- 3 Aspect Pedestrian Signal (RMAMGM)
- Pedestrian Push Button Unit (PB)

ALL PROPOSED SIGNALS TO BE LED TYPE

LEVEL -1 - TICKET BARRIER LAYOUT

SCALE 1 :250

BOTTOM OF RAMP @ 23.44m

INSET:
SCALE 1 :250

SIGN (FIGURE 5.10) MOUNTED ON NEW POST

SIGN (FIGURE 5.10) MOUNTED ON NEW POST

+26.52

+26.50

+26.40

STAGE DIAGRAMS

STAGE STREAM 1

1 2 3 4A OR 5B

STAGE STREAM 2

1 2

* FLASHING AMBER

PL3		GMcT	RFI ISSUE	DMcD
PL2		GMcT	RSA ISSUE	TO
PL1		GMcT	PLANNING ISSUE	SWJ

NOTES:

1. (TSH) - TRAFFIC SIGNS MANUAL (DOE) - 1996
   (PCF) - PROVISION OF CYCLE FACILITIES (DOE)
2. ALL ROADSIDE FURNITURE TO HAVE A MINIMUM CLEARANCE OF 0.5m FROM ROADSIDE EDGE OF FURNITURE TO FACE OF KERB
3. LANE INDICATION ARROWS TO BE INSTALLED IN ACCORDANCE WITH FIGURE 7.28 (TSM)
4. YIELD ROAD MARKING TRIANGLES TO BE INSTALLED IN ACCORDANCE WITH FIGURE 7.2 (TSM).
5. ALL ROAD MARKING TO BE 100mm WIDE UNLESS SPECIFIED OTHERWISE
6. ALL ROAD MARKING TO BE WHITE UNLESS SPECIFIED OTHERWISE
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9. ALL PROPOSED ROAD MARKINGS TO TIE IN WITH EXISTING
10. EXISTING ROAD MARKINGS TO BE BURNT OFF AS INDICATED BY THE ENGINEER
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12. RED SURFACE MATERIAL TO ON ROAD CYCLE LANES BUS CAGES AND CONTROLLED PEDESTRIAN CROSSINGS TO BE EPOXY RESIN BASED MATERIAL TO CLAUSE 935.
13. ALL LEVELS RELATE TO OS DATUM, MALIN HEAD.

KEY:

(2.0-2.0-0.1) 2.0m LINE, 2.0m GAP, 0.1m WIDE LINE MARKING

+26.50 EXISTING LEVEL

+26.50 PROPOSED LEVEL

PAVILIONS SHOPPING CENTRE
PHASE 3

CHARTERED LAND LTD

PROPOSED DUBLIN ROAD
ACCESS LAYOUT
GROUND LEVEL

PLANNING

ARUP
DUBLIN CORK LIMERICK

1:500 @ A1 (1:1000 @ A3) | G McTERNAN
SWJ | DMcD | 19/11/08

D5472.20 | T0005 | PL3

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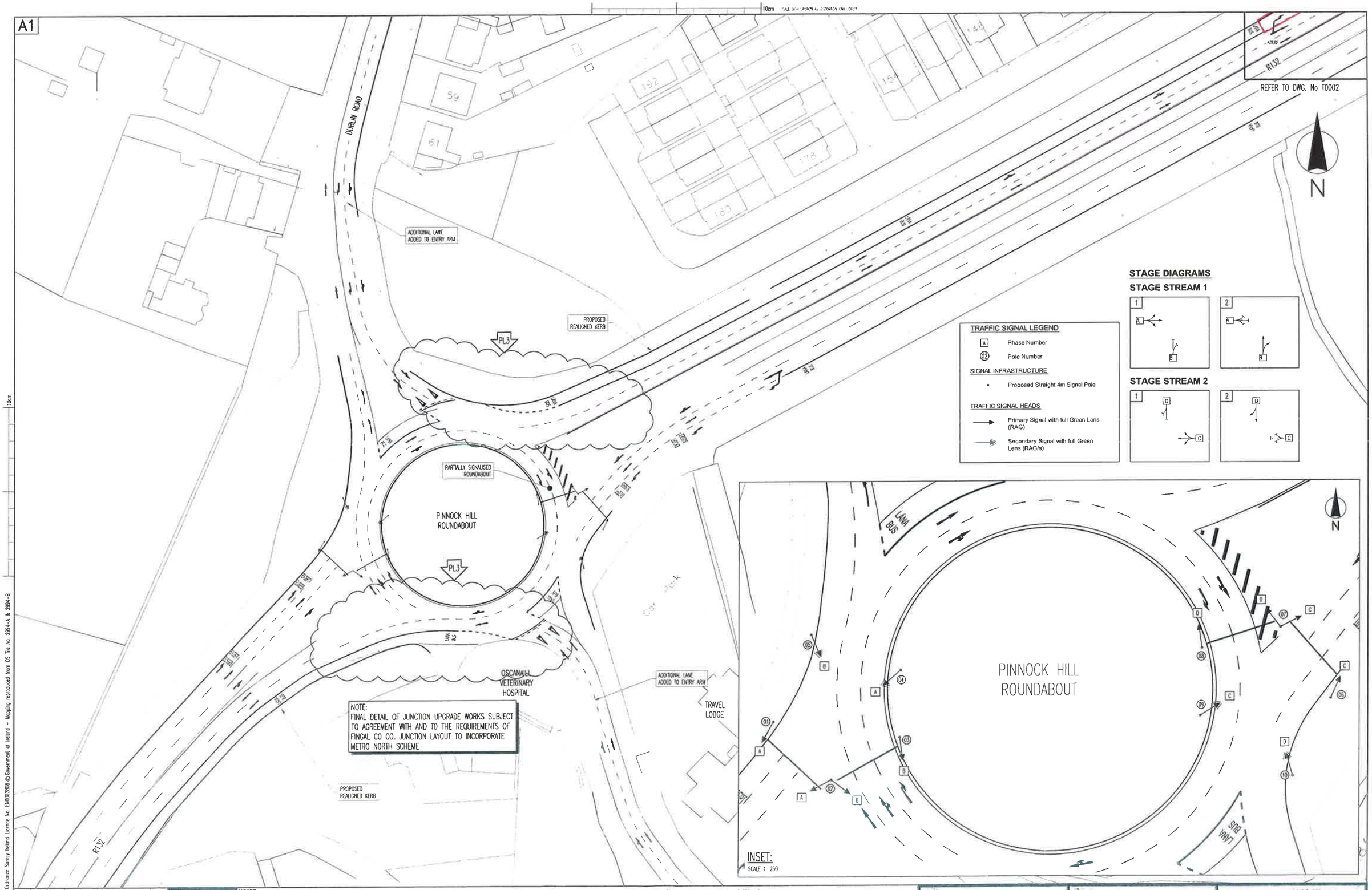

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PL3		GMcT	RFI ISSUE	
PL2		GMcT	RSA ISSUE	TO
PL1		GMcT	PLANNING ISSUE	SVJ

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KEY:

(2.0-2.0-0.1) 2.0m LINE, 2.0m GAP, 0.1m WIDE LINE MARKING

+26.50 EXISTING LEVEL

+26.50 PROPOSED LEVEL

PAVILIONS SHOPPING CENTRE PHASE 3

CHARTERED LAND LTD

PROPOSED MODIFICATIONS TO PINNOCK HILL ROUNDABOUT

PLANNING

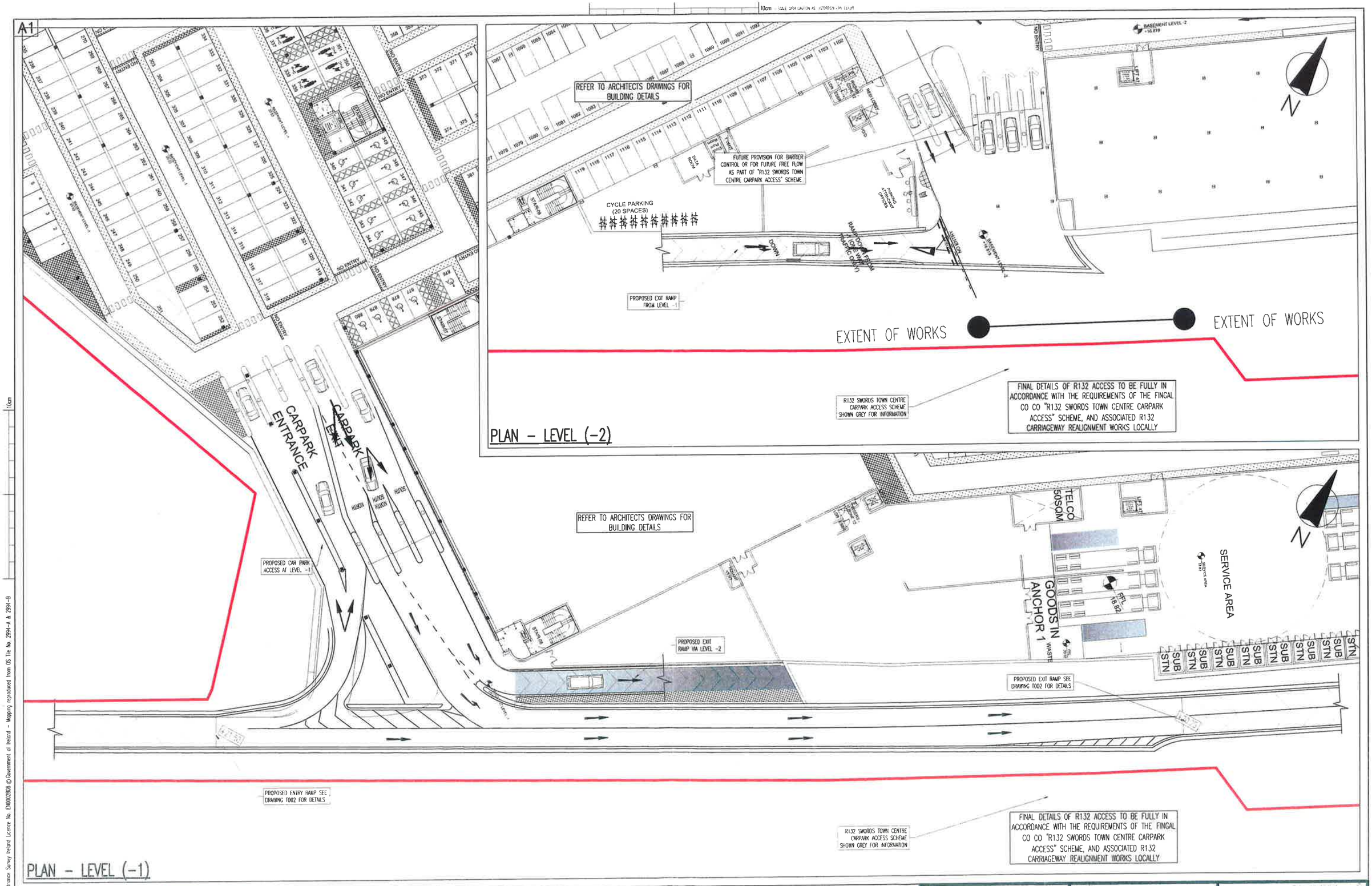
ARUP

DUBLIN CORK LIMERICK

1:500 @ A1 (1:1000 @ A3) G.McTERNAN

SVJ DMcD 19/11/08

D5472.20 T0006 PL3



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PL1		GMcT	PLANNING ISSUE	SVJ

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KEY:

(2.0-2.0-0.1) 2.0m LINE, 2.0m GAP, 0.1m WIDE LINE MARKING

+26.50 EXISTING LEVEL

+26.50 PROPOSED LEVEL

PAVILIONS SHOPPING CENTRE PHASE 3

CHARTERED LAND LTD

R132 DEVELOPMENT ACCESS LAYOUT LEVEL (-1) & (-2)

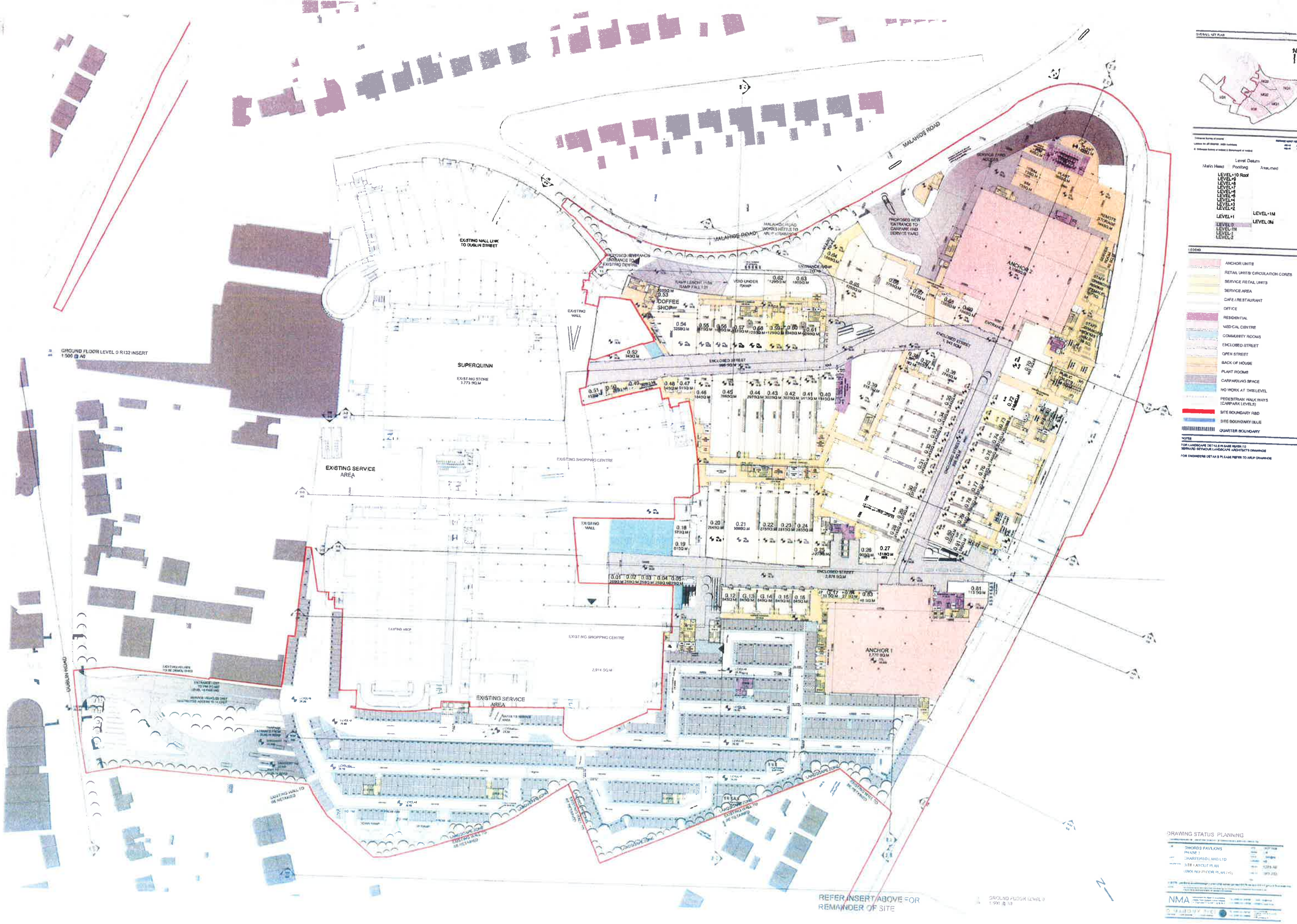
PLANNING

ARUP

1:250 @ A1 (1:500 @ A3) | G.McTERNAN | SVJ | DMcD | 18/08/08

D5472.20 | T0003 | PL1

MALAHIDE ROAD
LONGLANDS
MALAHIDE ROAD
LONGLANDS
MALAHIDE ROAD
NO WORKS AT THIS LEVEL
NO WORKS AT THIS LEVEL
NO WORKS AT THIS LEVEL
VOID
EXISTING SERVICE CORE
EXISTING CARPARK LEVEL -1M
CAR PARK VENT PLANT
PARKING
PARKING
BASEMENT LEVEL -1M
1:500 @ A0
OVERALL KEY PLAN
N
Level Datum
Main Head
Poolbeg
Assumed
LEVEL+10 Roof
LEVEL+9
LEVEL+8
LEVEL+7
LEVEL+6
LEVEL+5
LEVEL+4
LEVEL+3
LEVEL+2
LEVEL+1
LEVEL 0
LEVEL-1M
LEVEL-1
LEVEL-2
LEVEL+1M
LEVEL 0M
LEGEND
ANCHOR UNITS
RETAIL UNITS/ CIRCULATION CORES
SERVICE RETAIL UNITS
SERVICE AREA
CAFE / RESTAURANT
OFFICE
RESIDENTIAL
MEDICAL CENTRE
COMMUNITY ROOMS
ENCLOSED STREET
OPEN STREET
BACK OF HOUSE
PLANT ROOMS
CARPARKING SPACE
NO WORK AT THIS LEVEL
PEDESTRIAN WALK WAYS (CARPARK LEVELS)
SITE BOUNDARY RED
SITE BOUNDARY BLUE
QUARTER BOUNDARY
NOTES
FOR LANDSCAPE DETAILS PLEASE REFER TO BERNARD SEVIGNE LANDSCAPE ARCHITECTS DRAWINGS
FOR ENGINEERS DETAILS PLEASE REFER TO ARUP DRAWINGS
DRAWING STATUS: PLANNING
SWORDS PAVILIONS
PHASE 3
CHARTERED LAND LTD
3316-AE
SP3-202
NMA
O'MAHONY PIKE


MALAHIDE ROAD
DUBLIN ROAD
EXISTING MALL LINK TO DUBLIN STREET
SUPERQUINN
EXISTING STORE 1,773 SQ.M
EXISTING SERVICE AREA
EXISTING SHOPPING CENTRE
EXISTING MALL
COFFEE SHOP
ENCLOSED STREET
ANCHOR 1
ANCHOR 2
PROPOSED NEW ENTRANCE TO CARPARK AND SERVICE YARD
GROUND FLOOR LEVEL 0 R132 INSERT 1:500 @ A0
REFER INSERT ABOVE FOR REMAINDER OF SITE
OVERALL KEY PLAN
Level Datum
LEVEL+10 Roof
LEVEL+1M
LEVEL 0M
LEGEND
ANCHOR UNITS
RETAIL UNITS/ CIRCULATION CORES
SERVICE RETAIL UNITS
SERVICE AREA
CAFE / RESTAURANT
OFFICE
RESIDENTIAL
MEDICAL CENTRE
COMMUNITY ROOMS
ENCLOSED STREET
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BACK OF HOUSE
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CARPARKING SPACE
NO WORK AT THIS LEVEL
PEDESTRIAN WALKWAYS (CARPARK LEVELS)
SITE BOUNDARY RED
SITE BOUNDARY BLUE
QUARTER BOUNDARY
NOTES
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FOR ENGINEERING DETAILS PLEASE REFER TO ARUP DRAWINGS
DRAWING STATUS PLANNING
SWORDS PAVILIONS
PHASE 1
CHARTERED LAND LTD
SITE LAYOUT PLAN
GROUND FLOOR PLAN
NMA

OVERALL KEY PLAN

Level Datum

Malin Head : Poolbeg Assumed

LEVEL+10 Roof
LEVEL+9
LEVEL+8
LEVEL+7
LEVEL+6
LEVEL+5
LEVEL+4
LEVEL+3
LEVEL+2
LEVEL+1
LEVEL+1M
LEVEL 0
LEVEL-1M
LEVEL-1
LEVEL-2

LEGEND

- ANCHOR UNITS
- RETAIL UNITS/ CIRCULATION CORES
- SERVICE RETAIL UNITS
- CAFE / RESTAURANT
- OFFICE
- RESIDENTIAL
- MEDICAL CENTRE
- COMMUNITY ROOMS
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- SITE BOUNDARY RED
- SITE BOUNDARY BLUE
- QUARTER BOUNDARY

NOTES

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FOR ENGINEERS DETAILS PLEASE REFER TO ARUP DRAWINGS

DRAWING STATUS PLANNING

SWORDS PAVILIONS
PHASE 3
CHARTERED LAND LTD

MEZZ GROUND FLOOR PLAN (1:500)

NMA

CINEMAS
EXISTING STORE ARGOS
EXISTING STORE TK MAX
EXISTING MULTI-STOREY CARPARK
DUNNES EXISTING STORE 4,623 SQ.M
FOOD COURT
OPEN STREET
ENCLOSED STREET
CENTRAL STREET
COURT YARD
Crèche 1.08
Community Room
ANCHOR 1
ANCHOR 2
SURFACE CARPARK ON 10M
Level Datum
Main Head
Poolbag
Assumed
LEVEL+10 Roof
LEVEL+9
LEVEL+8
LEVEL+7
LEVEL+6
LEVEL+5
LEVEL+4
LEVEL+3
LEVEL+2
LEVEL+1M
LEVEL 0M
LEVEL 0
LEVEL-1M
LEVEL-1
LEVEL-2
ANCHOR UNITS
RETAIL UNITS/CIRCULATION CORES
SERVICE RETAIL UNITS
SERVICE AREA
CAFE / RESTAURANT
OFFICE
RESIDENTIAL
MEDICAL CENTRE
COMMUNITY ROOMS
ENCLOSED STREET
OPEN STREET
BACK OF HOUSE
PLANT ROOMS
CARPARKING SPACE
NO WORK AT THIS LEVEL
PEDESTRIAN WALKWAYS (CARPARK LEVELS)
SITE BOUNDARY RED
SITE BOUNDARY BLUE
QUARTER BOUNDARY
DRAWING STATUS: PLANNING
NMA

Legend

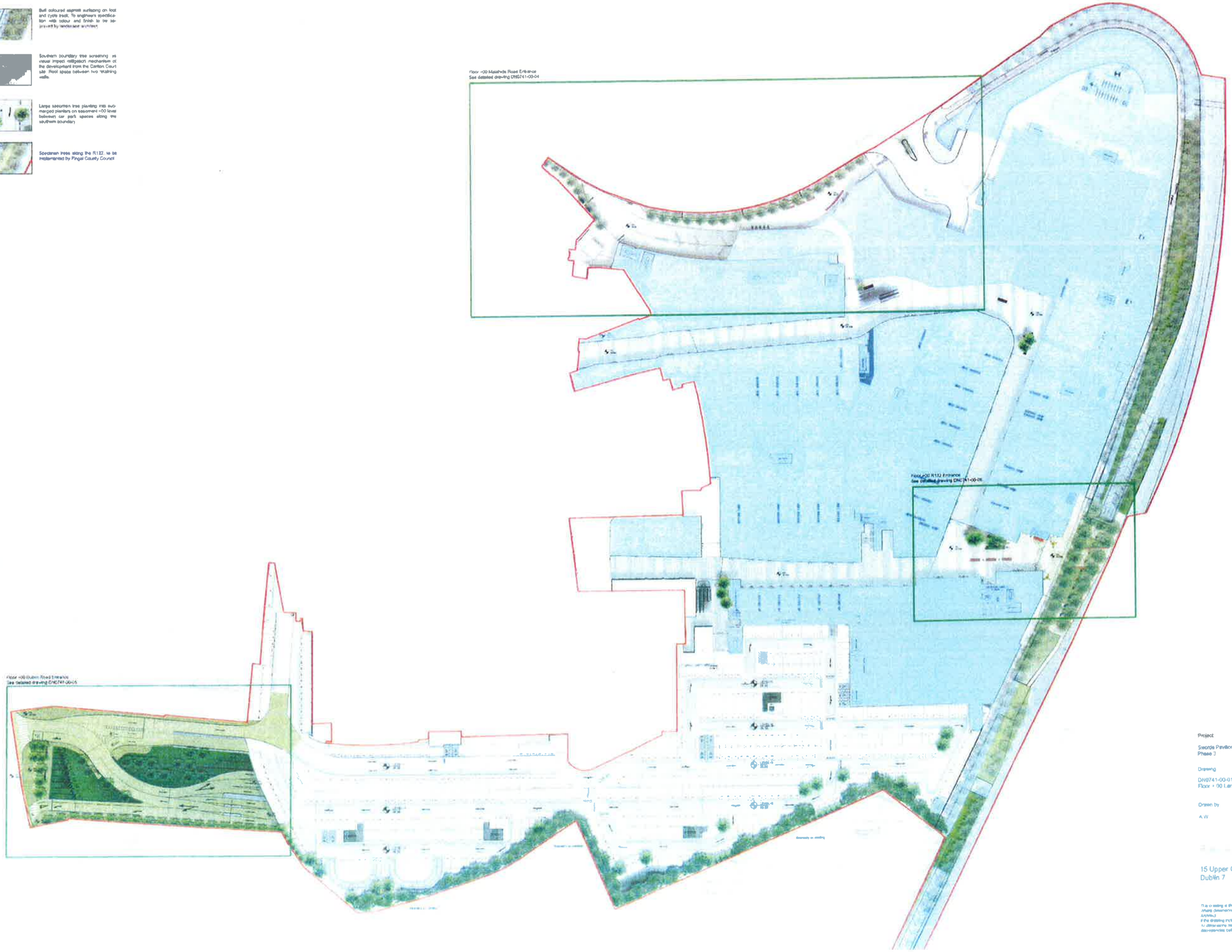
Interior mall paving, roof landscape specification.

Buff coloured asphalt surfacing on foot and cycle track. To engineers specification with colour and finish to be approved by landscape architect.

Southern boundary tree screening as visual impact mitigation mechanism of the development from the Carlton Court site. Root space between two retaining walls.

Large specimen tree planting into submerged planters on basement +00 level between car park spaces along the southern boundary.

Specimen trees along the R132, to be implemented by Fingal County Council.



Project:
Swords Pavilions
Phase 3

Client:
Chartered Land Limited

Drawing:
DN0741-00-01
Floor + 00 Landscape Masterplan

Purpose:
Planning

Drawn by	Checked by	Date	Scale
A.W.	B.S.	[illegible]	1/500 @ A0

Landscape Architects

15 Upper Ormond Quay
Dublin 7

+00 353 1 8747764
+00 353 1 8747875
info@bslarch.com

This drawing is the copyright of the Landscape Architect. Unless otherwise stated all dimensions are in millimetres. Where dimensions are not given, drawings must not be scaled and the matter must be referred to the Landscape Architect.
If the drawing includes conflicting details dimensions the matter must be referred to the Landscape Architect. All dimensions must be checked on site. The Landscape Architect must be informed of the Contractor of any discrepancies before work proceeds.

A1

10cm

FOR INDICATIVE PURPOSES ONLY

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PL3		CMcT	RFI ISSUE	DMcD
PL2		CMcT	RSA ISSUE	TO
PL1		CMcT	PLANNING ISSUE	SWJ

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13. ALL LEVELS RELATE TO OS DATUM, MALIN HEAD.

KEY:

(2.0–2.0–0.1) 2.0m LINE, 2.0m GAP, 0.1m WIDE LINE MARKING

EXTENT OF PROPOSED WORKS EXTERNAL TO THE SITE. ALL WORKS TO BE CARRIED OUT BY, OR TO THE REQUIREMENTS OF FINGAL CO.CO

PAVILIONS SHOPPING CENTRE
PHASE 3

CHARTERED LAND LTD

SITE CONTEXT DRAWING
GROUND LEVEL

PLANNING

ARUP
DUBLIN CORK LIMERICK

1:2000 @ A1 (1:2000 @ A3) G.McTIERNAN
SWJ DMcD 19/11/08

D5472.20 T0001 PL3

A1

10cm SCALE WITH CAUTION AS DISTORTION ON COPY

SQ1

MQ2

REFER TO DWG. No T0004

MQ1

MQ1

EXISTING KERB

REALIGNED KERB

EXISTING LEFT-IN LEFT OUT TO BE EXTINGUISHED

PROPOSED MEDIAN BARRIER

PROPOSED EXIT RAMP UP FROM LEVEL -1 AT 1:12 GRADIENT

REFER TO DWG. No T0005

SQ2

ROOF PLAN OF BUILDINGS SHOWN REFER TO ARCHITECTS DRAWINGS FOR BUILDING DETAILS

FOOTPATH AND CYCLE TRACK SHOWN BENEATH ROOF PLAN

REALIGNED KERB

EXISTING KERB

N

TIE-IN TO EXISTING KERB

PROPOSED BUS BAY

A

B

B

A

FINAL DETAILS OF R132 ACCESS TO BE FULLY IN ACCORDANCE WITH THE REQUIREMENTS OF THE FINGAL CO CO "R132 SWORDS TOWN CENTRE CARPARK ACCESS" SCHEME, AND ASSOCIATED R132 CARRIAGEWAY REALIGNMENT WORKS LOCALLY

EXISTING MEDIAN

PROPOSED ENTRY RAMP DOWN TO LEVEL -1 AT 1:10 GRADIENT

CARLTON COURT

REALIGNED KERB

EXISTING KERB

EXISTING SOUTBOUND CARRIAGEWAY

TIE-IN TO EXISTING KERB

R132

REFER TO DWG. No T0006

AIRSIDE BUSINESS PARK

10cm

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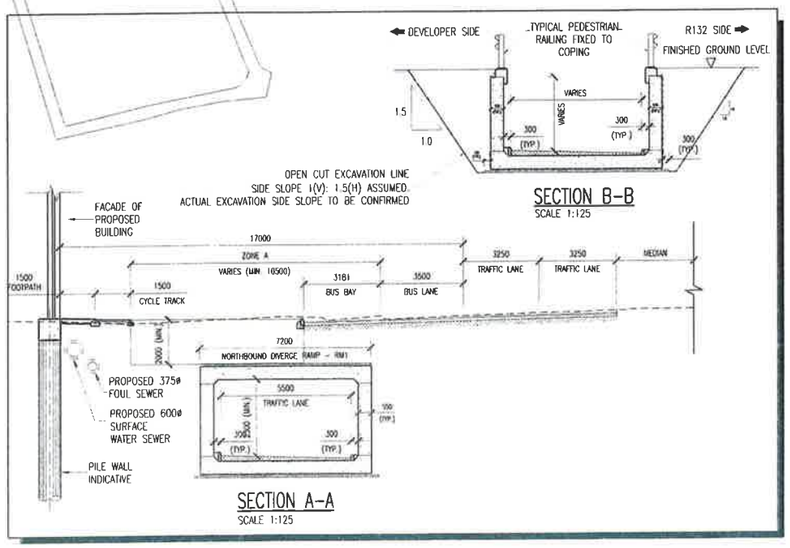

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+26.50 EXISTING LEVEL

(+26.50) PROPOSED LEVEL

PL1	GMcT	PLANNING ISSUE	SWJ

PAVILIONS SHOPPING CENTRE PHASE 3

CHARTERED LAND LTD

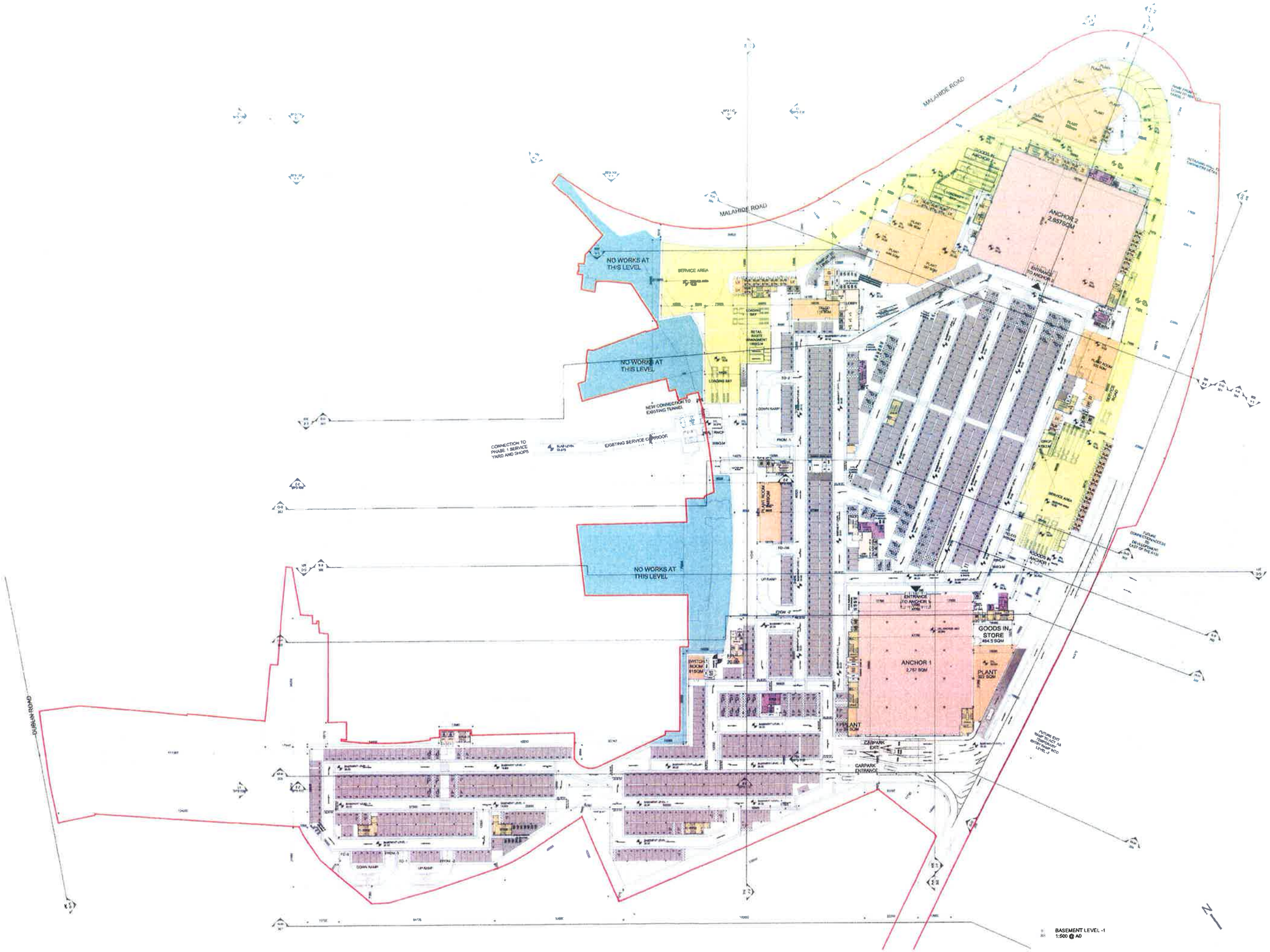
R132 DEVELOPMENT ACCESS LAYOUT LEVEL (0)

PLANNING

ARUP

DUBLIN CORK LIMERICK

1:500 @ A1 (1:1000 @ A3)		C McTERNAN
SWJ	DMcD	18/08/08
D5472.20	T0002	PL1



Level Datum

Main Head	Proofbag	Assumed
LEVEL+10 Roof		
LEVEL+9		
LEVEL+8		
LEVEL+7		
LEVEL+6		
LEVEL+5		
LEVEL+4		
LEVEL+3		
LEVEL+2		
		LEVEL+1M
LEVEL+1		
		LEVEL 0M
LEVEL 0		
LEVEL-1M		
LEVEL-2		

LEGEND

- ANCHOR UNITS
- RETAIL UNITS/ CIRCULATION CORES
- SERVICE RETAIL UNITS
- SERVICE AREA
- CAFE / RESTAURANT
- OFFICE
- RESIDENTIAL
- MEDICAL CENTRE
- COMMUNITY ROOMS
- ENCLOSED STREET
- OPEN STREET
- BACK OF HOUSE
- PLANT ROOMS
- CARPARKING SPACE
- NO WORK AT THIS LEVEL
- PEDESTRIAN WALK WAYS (CARPARK LEVELS)
- SITE BOUNDARY RED
- SITE BOUNDARY BLUE
- QUARTER BOUNDARY

NOTES

FOR LANDSCAPE DETAILS PLEASE REFER TO BERNARD SEYMOUR LANDSCAPE ARCHITECTS DRAWINGS

FOR ENGINEERS DETAILS PLEASE REFER TO MHP DRAWINGS

DRAWING STATUS: PLANNING

JOB	SWORDS PAVILIONS PHASE 3	DATE	08.07.2009
		SCALE	1:500
CLIENT	CHARTERED LAND LTD	DRAWN	
		CHECKED	MB
DESCRIPTION	BASEMENT -1	JOB No.	6378-AE
		DWG No.	SP3-201
		REV	

NMA

O'MAHONY PIKE

[redacted]

SWIFTWAY BUS RAPID TRANSIT

SWORDS/AIRPORT TO CITY CENTRE

Formal Observation

in relation to Swords Pavilions,

ON BEHALF OF TEBA, IRISH LIFE ASSURANCE plc & IPUT (PAVILIONS CO-OWNERSHIP)

Prepared By

SL&A

STEPHEN LITTLE & ASSOCIATES

Chartered Town Planning and Development Consultants

[redacted]

1 INTRODUCTION 2

2 SUBMISSION LANDHOLDING 3

3 SWORDS PAVILIONS SITE CONTEXT 3

3.1 EXISTING CENTRE 3
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1 Introduction

We, Stephen Little & Associates, Chartered Town Planning and Development Consultants, 6 Upper Mount Street, Dublin 2 are instructed by our client, Teba, Irish Life Assurance plc and IPUT, c/o Pavilions Co-Ownership, Pavilions Shopping Centre, Malahide Road, Co. Dublin, as owners of the Pavilions Swords to make this Formal Submission to the National Transport Authority (NTA) in respect of the plans by the NTA for a Rapid Bus Transit system known as Swiftway to operate between Swords/Airport and the City Centre.

This submission follows on from a submission made in March 2014 by Teba, Irish Life Assurance plc and IPUT wherein many of the same issues raised here have already been raised.

The proposed Swiftway project affect lands within our client's control at the Swords Pavilions, Swords, Co Dublin. The Swiftway project is proposed to operate along the R132 (Swords By-Pass) and crosses in front of the existing vehicular access to Swords Pavilions off the Swords By-Pass and would appear to propose a Stop at "*Swords Central*" at the Malahide Road Roundabout. We confirm that we have reviewed the material supplied by the NTA in respect of Swiftway.

From the outset, we wish to confirm that our client, Pavilions Co-Ownership, is wholly supportive in principle of the NTA's Swiftway project and welcomes the opportunity to formally comment upon same. The existing Swords Pavilions along with the rest of Swords Town Centre, is expected to benefit from the development of the Swiftway scheme in the long run. The Swords Central Stop is proposed to be located immediately northwest of the Swords Pavilions, along the R132, in proximity to the existing Malahide Road Roundabout, which is being replaced with a signal controlled 4 arm junction.

This submission relates primarily to the potential impacts of Swiftway on the ongoing and successful operation of the existing Swords Pavilions. Our client is seeking to ensure that the construction and operation of Swiftway will be undertaken with minimal disruption to the existing Centre or inconvenience to its tenants and customers. Based upon the lack of detail and information regarding traffic movements in particular, our clients are extremely concerned that the construction and operation of the BRT Swiftway has the potential to cause significant adverse impacts on the operation of the highly successful Pavilions. Our clients have invested significant sums of money in the past to make Pavilions the successful shopping/leisure destination that it is today. It would be totally unacceptable to our clients for a bus service to cause negative impact on Pavilions and to undermine the investment expended to date.

Of particular concern is that the operational Centre should remain fully accessible to customers arriving by private car and service vehicles and to those arriving by foot or public transport. Continued physical access by vehicles and pedestrians to the Centre during operational and opening hours is imperative to the ongoing success of the Pavilions. However, it is also incumbent on the NTA to ensure that any indirect adverse impact on access to the Centre by way of potential traffic congestion on the local road network serving the Centre, as a result of the proposed works, is adequately mitigated to ensure continued levels of accessibility.

We acknowledge that this phase of the Swiftway project is conceptual only at this stage and that a detailed design and full Environmental Impact Assessment of the proposals has yet to be carried out so as to test the concept. It is hoped that our clients submission will assist the NTA in ensuring that all relevant issues pertaining to the Pavilions is comprehensively addressed in the ultimate scheme.

Our clients are however concerned with the planned timescale of early 2015 for a full application given there remains a number of significant outstanding issues and concerns which our clients are only being afforded the opportunity to highlight now.

2 Submission Landholding

Pavilions Co-Ownership control those lands which currently accommodate the existing and operational Swords Pavilions (Phases 1 & 2), as illustrated in Figure 1, including its associated car parking areas. The existing Pavilions currently comprises approximately of c. 44,000sqm of retail space with over 75no. units and is anchored by Dunnes Stores, Supervalu, Zara and an 11 screen cinema. Ancillary facilities include, restaurants, cafes and a multi storey car park and service areas. There are approximately 2,000 car parking spaces at Pavilions, with approx. 72,000 movements weekly at peak periods. Pavilions adjoins and links with the Swords Central Shopping Centre which is anchored by a Penny's Department Store.

Vehicular access (customers and service vehicles) to the Pavilions Centre, is currently via two points; the Malahide Road entrance and the R132. The Malahide Road connects Swords Main Street and Dublin Street to the Malahide Road Roundabout on the R132. A further vehicular access to the Pavilions Centre is possible from a left-in left-out arrangement at the R132. This access arrangement relies upon the ability of cars exiting Pavilions wishing to go south merge freely with traffic on the R132 and to avail of the roundabout at the Malahide Road junction and turning south.

Pedestrians may access the Swords Pavilions via Malahide Road to a number of entrances along the Centre's northern and eastern facades, and via the Penney's complex from the Dublin Road. There is an existing pedestrian bridge over the R132 which connects the Malahide Road to lands east of the R132.

The existing Swords Pavilions (Phase 1) was opened in 2001. It was further expanded under the Phase 2 scheme, which has been fully operational since Autumn 2007. The Swords Pavilions is the fourth largest and is the second busiest shopping centre out of the top four centres nationwide.

This submission is made in the context of this existing Swords Pavilions, which has the benefit of approx. 2,000 car parking spaces as illustrated in Figure 1. This submission focuses on the existing operation at Pavilions.

3 Swords Pavilions Site Context

3.1 Existing Centre

As stated above the existing Swords Pavilions comprises approximately 75 no. units, and associated circulation and service areas. The Centre has the benefit of approx. 2,000 parking spaces, of which 1,696 are used for the daily operation of the Centre, with a further 300 spaces as an overflow which is used during peak shopping periods. This quantum of 2,000 spaces is required to be maintained so as to protect the current customer shopping experience.

The Pavilions offers an environment which supports a multi-shopping and leisure experience. The typical customer arrives to shop/browse in more than one retailer and as a result moves through the Centre, thereby attracting ancillary spend for the other retailers at Pavilions. The successful operation of the Centre relies upon the ease of access to and availability of car parking for shoppers as customers only have a limited period of time to shop. This is referred to as 'dwell time'; being the time a customer dwells in Pavilions. In the event of the dwell time decreasing due to access to parking being more convoluted or less convenient, this will significantly adversely impact on the operation of Pavilions. In a worst case scenario, if the access/parking experience becomes too negative customers will find an alternative destination to visit.

Clearly for Pavilions to continue to function successfully, it is critical that its customers find accessing and car parking as simple and as convenient as possible. In simple terms, it is important that customers find it easy to access the car park, that the trip from their car to the door of Pavilions and back again is a pleasant one and that when they leave Pavilions that they find it easy to negotiate their way home with ease.

The Swords Pavilions is connected to Dublin Road and Main Street via Malahide Road, off which the main vehicular and pedestrian access points to the Centre are located. A secondary left-in left-out vehicular access to Swords Pavilions exists at the eastern (R132) boundary. Additional pedestrian linkage to the Dublin Road is available via the Penney's Complex, adjoining the west of the Centre. Permission was granted and a link to the Penney's scheme constructed under planning application F06A/1682.

Figure. 1 Existing Swords Pavilions showing current access arrangements

Swords is identified as a Level 2 retail centre under the Retail Strategy for the Greater Dublin Area, and as a Major Town Centre under the Regional Planning Guidelines for the Greater Dublin area and the Fingal County Development Plan. As a significant element of Swords Town Centre, the business at Swords Pavilions is continuing to grow year on year which is consistent with its role in the regional and local planning and retail policy for Swords.

At present access to and from Pavilions by motor vehicle is provided at two locations; firstly off the R132 via a left in – left out arrangement. This results in left out movements using the Malahide Road Roundabout to navigate back to the south. The second access point is off a mini-roundabout on the Malahide Road itself. This facilitates access and egress for vehicles travelling from the east, west or south. The Malahide Road Roundabout plays an important role in managing the flows of traffic in and out of the Swords Pavilions.

3.2 Metro North Scheme (MNS) – Swords Stop and Alignment

It is worth highlighting at this point that there is Permission for a Metro North project which includes provision for various works in the vicinity of the Swords Pavilions (Ref. NA0007).

In this regard the primary insertions in to the local environment resulting directly from Metro North are the introduction of a new at grade Stop on the R132 directly opposite the Swords Pavilions, the creation of an underpass beneath the Malahide Road Roundabout for Metro North so as to maintain vehicle movements on the road and the removal and replacement of the pedestrian over bridge linking lands to the east of the R132 with the Swords Pavilions to the west.

We trust that the NTA will have regard to Metro North when devising the final details of the Swiftway project.

3.3 Pavilions – Phase 3

It is equally worth noting at this point that there is a planning permission in place for what is referred to as Pavilions Phase 3. Whilst this Permission relates to lands controlled by Tempore (a sister company of Teba), as they relate to the lands currently in use as car parking for Swords Pavilions it is relevant to refer to same here and to ensure that the NTA take account of this permitted changed context. The Permission in that case is under Reg. Ref. F08A/1057.

The existing planning permission enables the redevelopment of these lands and the provision of a large mixed-use scheme known as 'Swords Pavilions Phase 3'. 'Swords Pavilions Phase 3' is in compliance with the stated policies and objectives of Fingal County Council, in their aim to create a sustainable new city of over 100,000 people, with improved shopping facilities and strong commercial, cultural and social amenities.

It is important that the NTA have regard to this Permission in their final design.

4 Planning Context

4.1 Regional Planning Guidelines

The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 were built upon the objectives established by the National Spatial Strategy and the Strategic Planning Guidelines for the Greater Dublin Area. The Guidelines embrace the principles of sustainable development and aim to provide a coherent planning framework for county development plans and the provision of major transportation, sanitary services and other infrastructure.

Within the GDA, a distinction is made between the existing built up area of Dublin and its immediate environs i.e. the Metropolitan Area and the Hinterland Area, which have related, although separate development strategies.

The town of Swords is located within the Metropolitan area, where the RPGGDA state that further development should be located so as to maximise the potential of the public transport system. Swords is identified as a Metropolitan Consolidation Town within the Regional Planning Guidelines and has an important role as a developing town within the Dublin City Region. Metropolitan Consolidation Towns are noted as being:-

"strong active urban places within metropolitan area with strong transport links"

The Guidelines continue to support a strategy for the Metropolitan Area to consolidate development with an enhanced multi modal transport system. It is envisaged that this will require a further increase in overall residential development densities, the delivery of well-designed urban environments and measures to ensure priority for public transport. The Guidelines argue that this will lead to a more compact urban form and reduce the overall growth in demand for travel, particularly private car usage. Furthermore, the Guidelines state that priority should be given to the development of infill and renewal sites within urban areas as this will reduce urban sprawl and unnecessary greenfield development, which places pressure on new services and infrastructure.

The success of the Swords Pavilions as a shopping destination has assisted in delivering the objective of the regional planning documents to develop Swords as a Metropolitan Consolidation Town.

4.2 Retail Strategy for the Greater Dublin Area, 2008-2016

The purpose of the Retail Strategy is to guide the activities and policies for retail planning across the Greater Dublin Area. The Retail Planning Strategy for the Greater Dublin Area 2008-2016 was prepared following a review of the 2001 Strategy, and has been influenced by a number of policy documents including strategic policy documents and statutory development plans. The plan aims to inform the statutory planning process and to ensure that adequate provision is made for retail development within the GDA up to 2016.

The overall objective of the Retail Planning Strategy is to provide strategic guidance on the location and scale of new retail development to achieve a distribution that is efficient, equitable and sustainable. The Strategy acknowledges that a critical part of delivering the overall vision for the retail strategy is the recognition of the retail hierarchy as a core spatial policy around which future growth, rejuvenation and expansion in the retail sector needs to be focused.

The Strategy reconfirms the status of Swords as a *'Level 2 Major Town Centre / County Town Centre'* in the Retail Hierarchy and makes reference to the importance of these settlements achieving a sustainable and inclusive strategy through offering *"the widest shopping activities for the greatest number of people"*. It is therefore necessary to adopt a policy of 'structured choice', which concentrates the supply of retail facilities in areas that are easily accessible. In summary, the Strategy states that: -

> *"The most appropriate location for retail growth (outside of the district centres to meet the population growth) is in the Level 1 and 2 centres".*

By implementing this strategic approach, the existing Major / County Towns would be reinvigorated and provide for a more modern and wide-ranging shopping experience. Large town centres are noted as having the potential need for a longer period of time to develop. The Strategy recommends that this should be reflected in both Development Plans and the development management process, whereby longer planning permissions and greater floor areas would cater for demand beyond 2016.

The Strategy also requires that: -

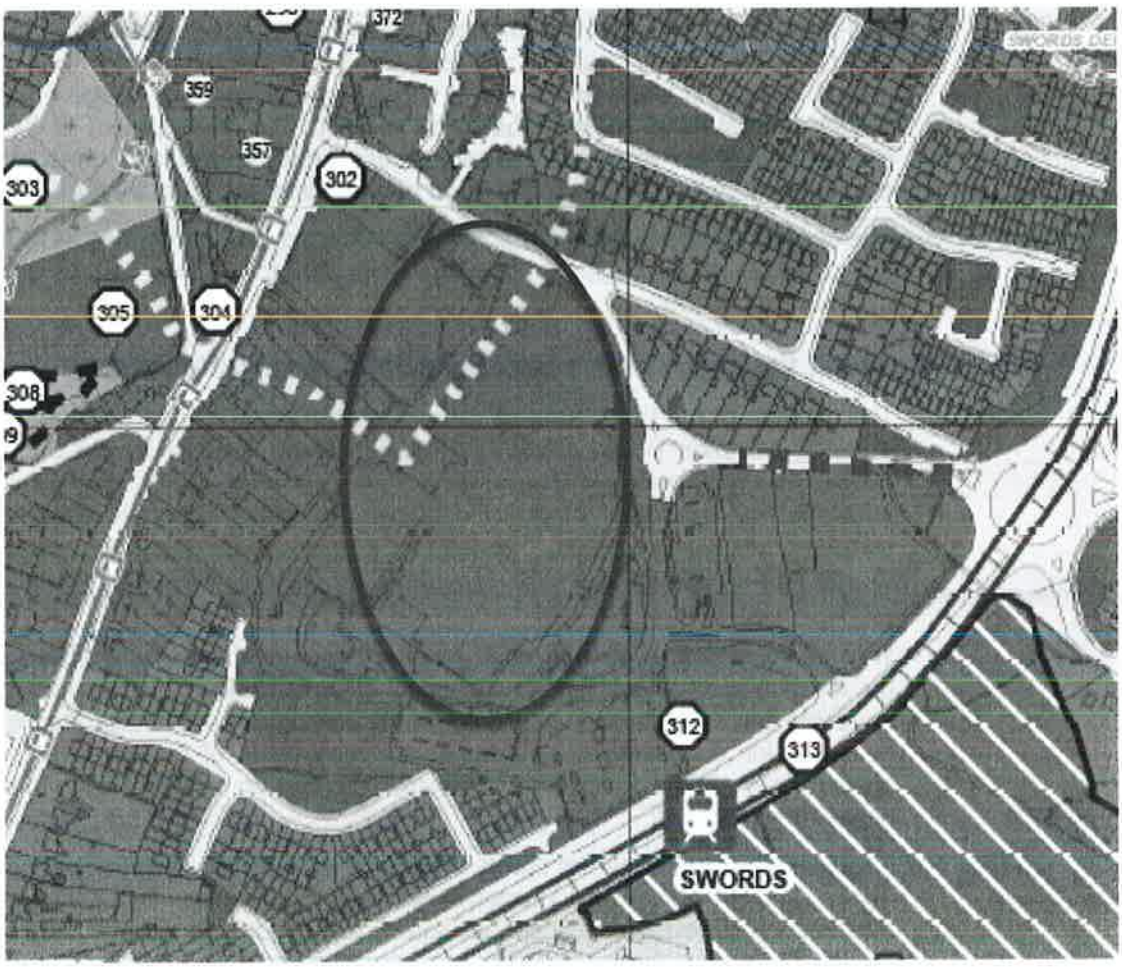
> *"To continue the improvement of the principal major town centres of Blanchardstown and **Swords** in line with their position in the hierarchy, through incorporating a variety of uses including civic, entertainment, office and residential uses, as well as a high quality range of convenience and comparison retail facilities, served by and supporting the provision of high quality public transport including new rail based public transport (Metro North and Metro West) proposed for both centres under Transport 21."*

The *Retail Strategy for the Greater Dublin Area 2008 - 2016* therefore supports the role of the Pavilions in line with the stated retail policy position outlined above.

It is imperative that the function and success of Pavilions is protected in any of the works planned by the NTA in order to ensure Pavilions continues to perform its designated role.

4.3 Fingal County Development Plan 2011 - 2017

The lands at Pavilions are zoned 'MC' – Major Town Centre in the Fingal County Development Plan 2011 – 2017.



The objective for the 'MC' zoning is:-

"protect, provide and/or improve major town centre facilities"

It is critical to our clients as the operators of the existing Swords Pavilions that the NTA ensure that the planned Swiftway protects, provides for and/or improves the current position.

To assist in understanding the significance of this zoning to the Council, the Development Plan provides a Vision for this zoning. It states as follows:-

Vision: *Consolidate the existing Major Towns in the County, (Blanchardstown, Swords and Balbriggan). The aim is to further develop these centres by densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses, and urban streets, while delivering a quality urban environment which will enhance the quality of life of resident, visitor and workers alike. The zone will strengthen retail provision in accordance with the County Retail Strategy, emphasise urban conservation, ensure priority for public transport, pedestrians and cyclists while minimising the impact of private car based traffic and enhance and develop the existing urban fabric. In order to deliver this vision and to provide a framework for sustainable development, masterplans will be prepared for each centre in accordance with the Urban Fingal Chapter objectives.*

4.4 Summary of Planning Context

It is evident from the review of the current planning context that the Swords Pavilions plays a critical role in the realisation of the Council's aspirations for Swords. These aspirations align with the current stated objectives at the Regional level, where Swords is identified as a Metropolitan Consolidation Town.

The protection of the existing operation at Swords Pavilions is vital to the achievement of both regional and local planning policy which seeks to see Pavilions play a significant role in the growth of Swords as a Metropolitan Growth Town.

The maintenance of the ease of accessibility and ease of movement/legibility for customers to get to and from the retail offer at Pavilions is essential to maintaining the growth at Pavilions.

Swiftway Proposals

We have reviewed the Swiftway plans and understand the following key changes are proposed to the R132 in the vicinity of the existing Swords Pavilions:

It is proposed to upgrade the Malahide roundabout to a traffic signal controlled junction to facilitate BRT priority through the junction. As part of this upgrade, entry and exit to Drynam Road will be restricted to left-in/left-out movements. U-turn movements previously catered for by the roundabout would no longer be possible with the upgraded junction. In this area, the BRT lanes run along the centre of the carriageway in the area currently occupied by the central median.

It is equally proposed to make similar alterations to the Pinnock Hill junction on the R132.

The Swords Central Swiftway stop is proposed to be located immediately south of the Malahide Road junction. Access to the stop will be provided at-grade via a new pedestrian crossing. This crossing will negate the need for the existing footbridge at this location and as such it is proposed to remove it. In order to facilitate the BRT lanes, it is necessary to widen the carriageway slightly on the western side of the R132 encroaching slightly on the Swords Pavilions lands.

It is proposed to close the existing left in, left out junction providing access to the Swords Pavilions car parks from the R132 and replace it with a new all-movement junction further south. The decision to provide an all movements junction is understood to be borne out of the requirement to upgrade the Malahide Road roundabout to a traffic signal controlled junction and the resulting removal of U-turn facilities. The existing roundabout at the Malahide Road junction is used by traffic exiting the Swords Pavilions left-in/left-out junction to travel south on the R132.

The new junction on the R132 will result in the existing Emergency Access adjacent to Carlton Court having to be closed. It is unclear how this is intended to be replaced.

It is unclear how the BRT proposals tie in with the previously permitted Metro North initiative.

5 Impact on Swords Pavilions

At this early stage in the development of the Swiftway design, our clients are concerned to re-state their willingness to work with the NTA and Fingal County Council to mitigate any impacts the Swiftway project might have on the current operation of the Swords Pavilions such that the access arrangements and ease of use of the car parks are not impacted adversely by the BRT proposals.

The proposals available at this time are very generic and as such only strategic comment can be made at this time as a result. We believe that the construction and operation of Swiftway will have the potential to impact on the following elements of Pavilions operations and we would invite the NTA to have regard to same in their assessments:-

- Vehicular Access
- Car Park layout
- Servicing, including access to Service Yards
- Pedestrians
- Taxi's
- Buses
- And the wider Swords area if traffic overspills

In the absence of any detail regarding same at this stage of the process, we raise the following concerns for the convenience of the NTA.

5.1 Operational Phase

The removal of the existing left-in left-out access arrangement to the R132 and its replacement with an all movement junction will be the most dramatic impact on the Pavilions. It is acknowledged that this new junction has the potential to be a major benefit to the accessibility of Pavilions. It will however cause a major reconfiguration of the internal car parking area so as to ensure the customer experience of visiting Pavilions results in one that is at the very least as convenient and as pleasant as it currently is.

It is evident from the concept drawings available that there is a significant alteration required to the internal car parking arrangements at Pavilions caused by the proposals to relocate the new access farther east along the R132. Our clients would request sight of the mitigation measures the NTA would intend putting in place to address this significant impact.

Our clients would also like to express some concern over the proposed revision to access to Pavilions from the R132. As we have highlighted previously it is vital to the running of Pavilions that access and egress arrangements remain legible and efficient during both the construction and operation phases of the Swiftway project.

It is unclear as to why the existing access off the R132 is proposed to be closed as part of the BRT project. It is considered that an opportunity may exist to retain the existing left-in left-out access off the R132 serving Pavilions in tandem with the delivery of the new all movement junction outlined by the NTA off the R132. Whilst the precise operation of such a junction can be explored, it could at the very least assist in providing left turn exit movements from Pavilions joining the R132 via the existing merging arrangements.

The efficiency of the new all movement junction needs to be carefully modelled to have regard to the significant volumes of traffic using the Pavilions each day. We would expect that the NTA will be addressing this as part of the EIA process associated with their detailed design. In the absence of understanding such detail, our clients are simply not in a position to support the detail of the BRT proposals as currently presented.

As noted above, the access arrangements to the Pavilions off the R132 involves an inter-relationship as between the left-in left-out access and the roundabouts at both Malahide Road and at Pinnock Hill which affords the ability to make U-turning movements. The BRT proposals seek to remove the left-in left-out access (together with its free flow merging ability) and turn the roundabouts at Pinnock Hill and Malahide Road into signal controlled junctions.

Our clients would also like to see further detail on the proposed traffic flow management measures (to include the modelling outputs) at the Malahide Road roundabout and Pinnock Hill roundabout.

Access to and from Pavilions is of the upmost importance for the successful operation of the Shopping Centre. Customers typically arrive to shop and browse in more than one retailer at Pavilions thus attracting ancillary spend for other non-anchor retailers. Customers have finite time in which to conduct their shopping. Decreasing the amount of time spent in accessing and exiting Pavilions lengthens the customer shopping experience. If the customer experience becomes too negative, potential customers will find alternative destinations. A decline in customer numbers will mean a decline in customer spend, which will affect on the ability of retailers to meet their operating costs and may result in loss of jobs and closure of retail units. It is imperative that the customer experience of accessing the car park is pleasant and efficient, it is also important that access arrangements remain legible.

The new access position off the R132 will automatically cause amendments to be required to the car parking layouts at Pavilions. In addition, the alterations to both the proposed changes to the Pinnock Hill and Malahide Road junctions and the nature of the junction off the R132 and the Malahide Road junction will create an entirely different profile of access and egress associated with Pavilions which needs to be reflected in the

organisation of the car parking at Pavilions. This is a complex issue that can best be explained through a technical discussion with the NTA and their technical team. This is a dialogue which our client would welcome.

The BRT Swiftway will as a result have a direct impact on the layout and organisation of the Pavilions car park. We trust this is something the NTA will take in to account when modelling the traffic implications at Pavilions arising from the BRT proposals. Furthermore, it is expected that the BRT project would carry the costs associated with the necessary internal reconfiguration of the Pavilions car parking so as to ensure that the current accessibility and convenience for Pavilions customers is at least maintained at current levels, or exceeded.

Another obvious issue arising from the proposals being tabled by the NTA is one involving the provision of a Stop at the Malahide Road junction and how pedestrian flows will be altered. We would also like to see further detail relating to the new arrangement to replace the current pedestrian bridge that allows pedestrians cross the R132 and enter Pavilions.

At present that roundabout provides a critical means of catering for traffic movement in and out of Swords Town Centre, including the Pavilions. Our clients would be interested in discussing with the NTA the proposals in hand to address this in the context of the planned Swiftway Stop.

As the NTA are aware, the RPA have obtained permission for Metro North, which is designed so as to maintain the operations at Pavilions. Our clients would be concerned to ensure that the Swiftway project takes this Metro North project in to account (ie the cumulative effect) so as to ensure that the Swords Pavilions is not adversely affected. Our clients would also like to know are there plans for integrating Swift Way with Metro North and how this might be achieved and will it affect the operation of Pavilions.

Our clients would like to see further detail on proposed mitigation measures to ensure any impact to the users listed above would be minimal, and more importantly that the operation of Pavilions is not caused to be altered below the level of service and convenience that is it currently enjoyed both during BRT construction and operation. These key operational issues are as follows:-

- Signalling frequency and duration for traffic entering and exiting the Pavilions via the new all movements junction;
- The traffic management measures required internally;
- The ease of access to the surface and Multi Storey Car Park;
- Pedestrian routes from the Swiftway Stop and bus stops to the shopping centre entrance; and
- Geometric revisions to the junctions in the vicinity.
- Revisions to the car park layout works required as a direct result of the BRT project (at NTA cost)

5.1.1 Mitigation Measures for Incorporation in Swiftway Project

Our client has a number of suggestions to mitigate the potential impacts outlined above, these mitigation measures are as follows: -

- The new junction on the R132 should allow for customer movements in and out of the car park at frequencies that at least maintain the current accessibility of Pavilions
- Maintain the existing R132 entrance to allow left in / left out movement to assist in maintaining the current accessibility at the Swords Pavilions. This access would also replace the existing emergency access;

- Internal revisions of the Pavilions car park to accommodate altered access point and to permit the holding of traffic prior to discharge through this R132 junction. This would mitigate the concerns of our clients with regard to this matter regarding the loss of car parking spaces, the circulation routes through the car parking areas, the convenience for customers generally.

5.2 Construction Phase

There has been no detail provided concerning the construction phase of BRT Swiftway at this time. It is critical to the on-going success of Pavilions that the accessibility and convenience of the existing arrangements are maintained throughout the construction phase.

As noted, the Centre operates with 2,000 parking spaces and it is a requirement that this be maintained throughout the construction phase of BRT.

5.2.1 Consultation / Agreement

Whilst perhaps a little premature at this time, our client seeks clarification and agreement on details of construction works, timing/programme, duration of works, mitigation measures and consultation process, prior to approval and commencement of the Swiftway works.

At present, with so many variables and unknowns, it is impossible to ascertain in any definitive way whether the potential impacts, noted above, can be successfully mitigated so as to ensure the ongoing operation of the existing Swords Pavilions.

As a key stakeholder, our client is requesting that, as part of the Swiftway mitigation measures, it be afforded a position on a steering group to be set up to schedule, implement and approve temporary construction phase impacts such as road closures / service outages etc. This would ensure our client is informed and involved prior to and during the Swiftway construction process. In turn this would allow our client to negotiate and manage any construction stage impacts which may negatively affect operations at the Swords Pavilions. This is considered essential to safeguard the continued operation of the Swords Pavilions, during construction.

6 Conclusion & Recommendations

Given the significance of Pavilions to the economy of Swords and also Fingal as a whole, we would request that the NTA engage directly with our client in advance of making any planning application so as to address our clients concerns and to demonstrate that the BRT proposals will not leave the accessibility and convenience of entering and existing Pavilions and its car parks any worse than it is presently.

Notwithstanding this, our client is concerned that there is potential that the construction and operation of Swiftway could have significant adverse impacts on the ongoing and successful operation of the existing Swords Pavilions. Our client is also acutely aware of the relationship of the existing Centre to the proposed Metro North scheme. We recognise that the design of Swiftway is at an early stage and would welcome the opportunity to engage with the NTA and Fingal County Council in order to ensure that the significant asset to the County that is the Swords Pavilions is not prejudiced by any proposals relating to Swiftway and to minimise any negative impact the BRT project has on the accessibility and convenience of Swords Pavilions.

Our clients would welcome a discussion on how Swiftway can be practically integrated with development at Swords Pavilions in the short to medium term without compromising the operation of Pavilions. There is nothing in the information provided that provides our client with this comfort to date.

We trust that the NTA will have due regard to this submission when considering the detailed design aspects of the Swiftway project.

We confirm that Pavilions Co-Ownership would be available to meet with the NTA to discuss their particular concerns and to discuss viable solutions to addressing same.

We would be grateful for a written acknowledgement of this submission in due course.

[redacted]

SWIFTWAY BUS RAPID TRANSIT

SWORDS/AIRPORT TO CITY CENTRE

Formal Observation

in relation to Phase 3 at Swords Pavilions

ON BEHALF OF TEMPORE

Prepared By

SL&A

STEPHEN LITTLE & ASSOCIATES

Chartered Town Planning and Development Consultants

[redacted]

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1 Introduction

We are instructed by our client, Tempore, Usher House, Main Street, Dundrum, Dublin 14 to make this Formal Submission to the National Transport Authority (NTA) in respect of the plans by the NTA for a Rapid Bus Transit system known as Swiftway to operate between Swords/Airport and the City Centre.

This submission follows on from our clients submission to the NTA in March 2014 regarding the Swords Swiftway project.

The proposed Swiftway project affect lands within our client's ownership at the Swords Pavilions, Swords, Co Dublin. Tempore owns the as yet undeveloped lands at the Swords Pavilions, Swords, including the surface car parking areas. The surface car parking on these lands are for the benefit of the Pavilions. This broadly comprises the lands between the face of the existing centre to the R132.

The Swiftway project is proposed to operate along the R132 (Swords By-Pass) and crosses in front of the existing access to Swords Pavilions off the Swords By-Pass and would appear to propose a Stop at "*Swords Central*" at the Malahide Road Roundabout. We confirm that we have reviewed the material supplied by the NTA in respect of Swiftway.

From the outset, we wish to confirm that our client is broadly supportive in principle of the NTA's Swiftway project and welcomes the opportunity to formally comment upon same.

This submission relates primarily to the potential impacts of Swiftway on our clients ability to implement their extant planning permission, and/or to develop their lands in some other way in the future. There would appear also some of our clients lands required to accommodate the Swiftway proposals.

We acknowledge at this point the submission being made by Teba, Irish Life Assurance plc and IPUT (Pavilions Co-Ownership) which deals with the operational issues arising from the Swiftway project for the operation of the Swords Pavilions.

2 Tempore Landholding

Our client's lands are located at the Swords Pavilions as indicated on Figure 1 below. These lands have the benefit of a planning permission for the expansion of the Swords Town at this location under Reg. Ref. F08A/1057. That scheme is known as 'Swords Pavilions Phase 3'. We provided details of that permitted scheme to the NTA as part of our submission last March 2014.

A portion of the subject Phase 3 lands presently accommodates surface car parking used to serve the existing Swords Pavilions. An access point to this parking and the existing Swords Pavilions is currently in operation, off the RI32. This access is secondary to the retail centre's main access point off the Malahide Road Roundabout (R106). It is envisaged that the Metro North line and the Swords Stop will run adjacent to the planned Phase 3 development of the Swords Pavilions Scheme, along the central median of the R132 (See Fig 1). The planned Metro stop for Swords is proposed to be located within this median, adjacent to the southern boundary of the Phase 3 lands.

Fig 1 Existing and Proposed Swords Pavilions Lands with the Tempore lands highlighted in red

3 Swords Pavilions Context

3.1 Permitted Phase 3 Scheme

As stated previously, our client has significant interest in a sizeable parcel of land, described generally as the proposed 'Swords Pavilions Phase 3' areas of the planned expansion of the Swords Pavilions. The existing Swords Pavilions (Phase 1 & Phase 2) is established since 2001, and was recently expanded under the Phase 2 scheme, operational since 2007.

The existing planning permission enable the redevelopment of these lands and the provision of a large mixed-use scheme known as 'Swords Pavilions Phase 3'. 'Swords Pavilions Phase 3' is in compliance with the stated policies and objectives of Fingal County Council, in their aim to create a sustainable new city of over 100,000 people, with improved shopping facilities and strong commercial, cultural and social amenities.

For the convenience of the NTA, we have set out the main attributes of the Swords Pavilions Phase 3 scheme. The proposed development consists of a mixed used development with a gross floor area of c.147,821m^2, providing for:

- 137 no. retail units including 2 no. retail anchor units generally located at Levels -1 to +3
- 35 no. restaurant / café units located at Level 0 to +3
- 1 no. public house located at Level +1 and Level +2
- Office accommodation located at Levels 0 to +9
- 2no. childcare facilities
- 2no. community rooms
- 1no. radio station
- 1no. medical centre
- A total of 189 no. residential units generally located at Levels 0M to +9,
- Approximately 4,000 car parking spaces at Pavilions will result once this permission has been implemented.

Fig 2 Proposed Swords Pavilions Phase 3 (Reg. Ref. F08A/1057 and ABP Ref. PL06F.232710).

Source: Lafferty Design Studio & NMA

The overall proposed development of the Swords Pavilions Phase 3 development adheres to the vision for Swords in terms of employing the architectural and urban design principles set down by the Swords Masterplan that was published in January 2009 and was prepared in compliance with Objective U01 of the Fingal County Development Plan 2005-2011.

3.1.1 Vehicle Access

In terms of vehicle access to the development, the proposed development seeks the replacement of 3 no. existing vehicular entrances with 1 no. temporary construction entrance in place of the existing emergency entrance at the R132 and 3 no. new permanent vehicular entrances and associated access roads for use during construction and operational phases. The 3 no. permanent vehicular entrances comprise 1 no. new left in/ left-out vehicular access off the R132 on the eastern site boundary, 1 no. new vehicular access off the Malahide Road on the northern site boundary and 1 no. new vehicular access off the Dublin Road on the western site boundary.

An integral part of this permitted access arrangement involves a left in left out arrangement along the R132 serving underground car parks. The exit ramp merges with the traffic entering the Malahide Road Roundabout via a dedicated merge lane. The traffic modelling associated with this permission was on the basis of the roundabout being in place. There were free flow lanes added to this junction to accommodate traffic movements to and from Pavilions.

We have attached for the convenience of the NTA the Floor Plans for the permitted development at Phase 3 of Swords Pavilions covering L-2 to L+1 as prepared by NMA Architects. In addition, to assist the NTA in understanding the permitted context we have also included the Landscape Masterplan for L0 prepared by Bernard Seymour Landscape Architects.

The proposed development will provides a total of 3,145 no. car parking spaces and 625 no. bicycle parking spaces. Metro North Scheme (MNS) – Swords Stop and Alignment

It is worth highlighting at this point that there is Permission for a Metro North project which includes provision for various works in the vicinity of the Swords Pavilions (Ref. NA0007) and which accommodates the permitted Swords Pavilions Phase 3 scheme. Tempore worked extensively with the RPA to ensure that the proposals for Metro North could be accommodated without adversely affecting Phase 3 at the Swords Pavilions. Indeed, there are Conditions of the Phase 3 permission that specifically address this interface.

In this regard the primary insertions in to the local environment resulting directly from Metro North are the introduction of a new at grade Stop on the R132 directly opposite the Swords Pavilions, the creation of an underpass beneath the Malahide Road Roundabout for Metro North so as to maintain vehicle movements on the road and the removal and replacement of the pedestrian overbridge linking lands to the east of the R132 with the Swords Pavilions to the west.

3.1.2 R132 Malahide Road

During the proposed construction phase of Metro North the number of traffic lanes on the R132 will remain unaltered with two general traffic lanes in each direction. It is proposed however, to remove the existing hard shoulder. The existing bus lanes along this part of the R132 will also be closed for the duration of the construction works (Sections 7.6.1 & 7.6.4, EIS Volume 2, Book 1). The published STMP plan, confirms the above and states:

> *'Two traffic lanes northbound and two lanes southbound on the Swords Road (R132) are retained through the works.'*

And

> *'During the construction phase, the number of traffic lanes on the R132 will remain unaltered, i.e. two general traffic lanes in each direction. However, the existing hard shoulder will be removed.'*

Appendix E (Section E.1.10) of the SMTP sets out further details where it is proposed that between the Seatown and Pinnock Hills Roundabouts, the southbound carriageway of the R132 will be moved between 3m and 8m east to accommodate the proposed Seatown and Swords Stops. The SMTP states that the initial phases of work will be to construct new sections of footpaths and carriageway using standard road construction techniques to the east of the existing southbound carriageway and that the inside southbound carriageway will be closed during this work. One lane of traffic will then be switched to the new pavement, whilst the new west kerb to the southbound carriageway is installed. The existing road surface will be planned off and replaced. It is stated that these operations will be planned to allow maintenance of two lanes of traffic.

Permanent widening of the R132 is also required so as to facilitate the construction of a median track and platform stop. A total of 0.4ha of land from our clients adjacent to the R132 is required to accommodate the road widening of the southbound lanes and new footpaths (Table 2.4, p48, EIS Vol. 2 Book 1). The Phase 3 Permission at Pavilions was designed so as to specifically align with the above Metro North proposals.

3.1.3 Malahide Road Roundabout Underpass

The Metro North route is proposed to traverse the Malahide Road roundabout via a new underpass before continuing along the median of the R132 either side of the roundabout. Works to construct an underpass to accommodate the Metro North line will also include replacement of the existing footbridge and creation of a construction compound. The SMTP recognises that the Malahide Road Roundabout is a main crossing point for travel between Malahide and eastern suburbs of Swords. The Plan gives further recognition that the Swords Pavilions and Swords Town also uses this roundabout and as such the roundabout carries substantial volumes of traffic crossing the R132.

The EIS states that it is proposed to replace the existing Malahide road footbridge with a new footbridge, spanning the R132 Swords Road. We refer to the amended drawing of the RPA, Drawing No. MN 0000 BS S001 L01 (March 2009) .

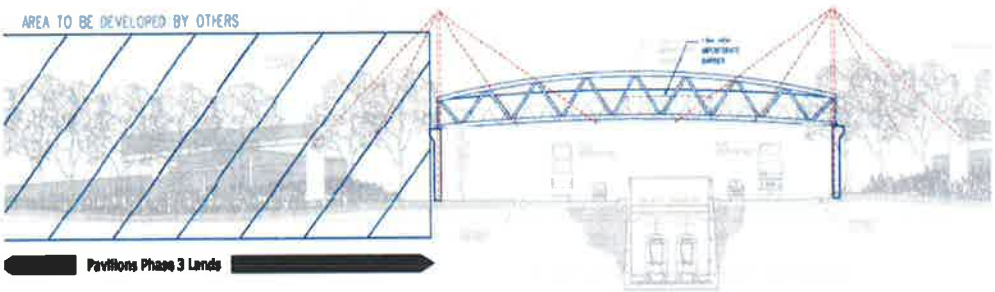

Figure 3: Revised Malahide Footbridge with revisions in red illustrating a span bridge now proposed (Extent of Phase 3 lands identified by black arrows)

The STMP states that the new longer footbridge will be constructed on completion of the Metro North main works to accommodate the road widening in the area. For the clarification of the NTA, we draw attention to the hatched area of this drawing that states 'Development by others' and confirm that these lands comprise part of the Swords Pavilions Phase 3 lands as co-owned by Tempore.

The EIS states that temporary crossing facilities are proposed to be used during construction and erection of the replacement footbridge. The STMP further states that signalised at-grade pedestrian crossing points on the R132 will be provided until the new footbridge is opened (Section E.1.14 Appendix E-1 refers).

We trust that the NTA will have regard to the permitted planning context when devising the final details of the Swiftway project.

4 Planning Context

4.1 Regional Planning Guidelines

The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 were built upon the objectives established by the National Spatial Strategy and the Strategic Planning Guidelines for the Greater Dublin Area. The Guidelines embrace the principles of sustainable development and aim to provide a coherent planning framework for county development plans and the provision of major transportation, sanitary services and other infrastructure.

Within the GDA, a distinction is made between the existing built up area of Dublin and its immediate environs i.e. the Metropolitan Area and the Hinterland Area, which have related, although separate development strategies.

The town of Swords is located within the Metropolitan area, where the RPGGDA state that further development should be located so as to maximise the potential of the public transport system. Swords is identified as a Metropolitan Consolidation Town within the Regional Planning Guidelines and has an important role as a developing town within the Dublin City Region. Metropolitan Consolidation Towns are noted as being:-

> *"strong active urban places within metropolitan area with strong transport links"*

The Guidelines continue to support a strategy for the Metropolitan Area to consolidate development with an enhanced multi modal transport system. It is envisaged that this will require a further increase in overall residential development densities, the delivery of well-designed urban environments and measures to ensure priority for public transport. The Guidelines argue that this will lead to a more compact urban form and reduce the overall growth in demand for travel, particularly private car usage. Furthermore, the Guidelines state that priority should be given to the development of infill and renewal sites within urban areas as this will reduce urban sprawl and unnecessary greenfield development, which places pressure on new services and infrastructure.

4.2 Retail Strategy for the Greater Dublin Area, 2008-2016

The purpose of the Retail Strategy is to guide the activities and policies for retail planning across the Greater Dublin Area. The Retail Planning Strategy for the Greater Dublin Area 2008-2016 was prepared following a review of the 2001 Strategy, and has been influenced by a number of policy documents including strategic policy documents and statutory development plans. The plan aims to inform the statutory planning process and to ensure that adequate provision is made for retail development within the GDA up to 2016.

The overall objective of the Retail Planning Strategy is to provide strategic guidance on the location and scale of new retail development to achieve a distribution that is efficient, equitable and sustainable. The Strategy acknowledges that a critical part of delivering the overall vision for the retail strategy is the recognition of the retail hierarchy as a core spatial policy around which future growth, rejuvenation and expansion in the retail sector needs to be focused.

The Strategy reconfirms the status of Swords as a *'Level 2 Major Town Centre / County Town Centre'* in the Retail Hierarchy and makes reference to the importance of these settlements achieving a sustainable and inclusive strategy through offering *"the widest shopping activities for the greatest number of people"*. It is therefore necessary to adopt a policy of 'structured choice', which concentrates the supply of retail facilities in areas that are easily accessible. In summary, the Strategy states that: -

> *"The most appropriate location for retail growth (outside of the district centres to meet the population growth) is in the Level 1 and 2 centres".*

By implementing this strategic approach, the existing Major / County Towns would be reinvigorated and provide for a more modern and wide-ranging shopping experience.

Large town centres are noted as having the potential need for a longer period of time to develop. The Strategy recommends that this should be reflected in both Development Plans and the development management process, whereby longer planning permissions and greater floor areas would cater for demand beyond 2016.

The Strategy also requires that: -

> *"To continue the improvement of the principal major town centres of Blanchardstown and **Swords** in line with their position in the hierarchy, through incorporating a variety of uses including civic, entertainment, office and residential uses, as well as a high quality range of convenience and comparison retail facilities, served by and supporting the provision of high quality public transport including new rail based public transport (Metro North and Metro West) proposed for both centres under Transport 21."*

The *Retail Strategy for the Greater Dublin Area 2008 - 2016* therefore supports the role of the Swords Pavilions in line with the stated retail policy position outlined above.

4.3 Fingal County Development Plan 2011 - 2017

The lands at Swords Pavilions are zoned 'MC' – Major Town Centre in the Fingal County Development Plan 2011 – 2017.

The objective for the 'MC' zoning is:-

> *"protect, provide and/or improve major town centre facilities"*

It is critical to our clients as the operators of the existing Swords Pavilions that the NTA ensure that the planned Swiftway protects, provides for and/or improves the current

position. Indeed, this is a requirement of the objective contained within the Statutory Development Plan.

To assist in understanding the significance of this zoning to the Council, the Development Plan provides a Vision for this zoning. It states as follows:-

Vision: *Consolidate the existing Major Towns in the County, (Blanchardstown, Swords and Balbriggan). The aim is to further develop these centres by densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses, and urban streets, while delivering a quality urban environment which will enhance the quality of life of resident, visitor and workers alike. The zone will strengthen retail provision in accordance with the County Retail Strategy, emphasise urban conservation, ensure priority for public transport, pedestrians and cyclists while minimising the impact of private car based traffic and enhance and develop the existing urban fabric. In order to deliver this vision and to provide a framework for sustainable development, masterplans will be prepared for each centre in accordance with the Urban Fingal Chapter objectives.*

4.4 Summary of Planning Context

It is evident from the review of the current planning context that the Swords Pavilions plays a critical role in the realisation of the Council's aspirations for Swords. These aspirations align with the current stated objectives at the Regional level, where Swords is identified as a Metropolitan Consolidation Town.

5 Impact on Tempore Lands

At this early stage in the development of the Swiftway concept, our clients are concerned to express their willingness to work with the NTA and Fingal County Council to mitigate any impacts the Swiftway project might have on the current operation of the Swords Pavilions.

The proposals available at this time are very generic and as such only strategic comment can be made at this time. There are however two principal areas of concern to our clients at this time, as follows

- Land Take
- Protecting the Pavilions Phase 3 Permission

Land Take

It would appear from the drawings presented that parts of the lands shown as forming part of the Swiftway project encroaches on lands controlled by Tempore. We attach herewith for the convenience of the NTA a map depicting the lands controlled by Tempore in red outline. The area at issue is in the vicinity of the junction with the roundabout at the Malahide Road junction with the R132.

Pavilions Phase 3

At the outset we note that we provided the NTA with A3 sets of the floor plans of the Phase 3 scheme as granted permission at Pavilions in our submission of March 2014. These are attached again for convenience.

It is an absolute requirement that the BRT project does not prejudice our clients ability to implement their permission. Our clients planning permission remains a valid permission until August 2017, unless previously extended.

The access to Pavilions Phase 3 from the R132 is to be from a new left-in left-out arrangement that served the basement car parking areas via a series of ramps which enabled a free from exit and merge on to the R132. Access via the Malahide Road was also retained. It remains unclear to our client that the NTA have taken this permitted arrangement in to account when devising their current proposals. There seems little correlation between the new all movement junction and our clients permitted junction.

We note also that the BRT project sees the removal of the existing pedestrian bridge over the R132 in the vicinity of the Malahide Road roundabout. Here again this poses a potential difficulty for our clients as the Pavilions Phase 3 scheme (and Metro North) (both permitted) were required to integrate with this bridge crossing.

In addition to this, the Phase 3 permission was fundamentally based upon pedestrian movement being focussed at the Metro Stop. The proposals by the NTA to locate the Swords Central bus stop at the Malahide Road junction will result in a totally different pedestrian movement profile from that which the Phase 3 scheme was specifically designed to accommodate. We would invite the NTA to critically assess how the BRT proposals would tie in to the Phase 3 permitted scheme.

In addition to this, Fingal County Council devised an elaborate landscaping strategy along the R132 to accommodate Metro North. Our clients planning permission reflected those proposals. It is unclear whether the BRT proposals are accommodating these landscape measures.

We acknowledge that the Phase 3 permission consists of a quite complex development and we would welcome the opportunity to outline this to the NTA in order that they may properly take this in to account in the final design of the Swiftway proposals.

5.1 Consultation / Agreement

Whilst perhaps a little premature at this time, our client seeks clarification and agreement on details of construction works, timing/programme, duration of works, mitigation measures and consultation process, prior to approval and commencement of the Swiftway works.

At present, with so many variables and unknowns, it is impossible to ascertain in any definitive way whether the potential impacts, noted above, will actually prove detrimental to the on-going operation of the existing Swords Pavilions.

As a key stakeholder, our client is requesting that, as part of the Swiftway mitigation measures, it be afforded a position on a steering group to be set up to schedule, implement and approve temporary construction phase impacts such as road closures / service outages etc. This would ensure our client is informed and involved prior to and during the Swiftway construction process. In turn this would allow our client to negotiate and manage any construction stage impacts which may negatively affect operations at the Swords Pavilions. This is considered essential to safeguard the permitted Phase 3 development of the Swords Pavilions, during construction.

6 Conclusion & Recommendations

Notwithstanding this, our client is concerned that there is potential that the construction and operation of Swiftway could have significant adverse impacts on the ability to implement the permitted Phase 3 development at Swords Pavilions. Our client is also acutely aware of the relationship of the permitted Phase 3 development to the proposed Metro North scheme. We recognise that the design of Swiftway is at a very early stage and would welcome the opportunity to engage with the NTA and Fingal County Council in order to ensure that the significant asset to the County that is the Swords Pavilions is not prejudiced by any proposals relating to Swiftway.

Our clients would welcome a discussion on how Swiftway can be practically integrated with development at Swords Pavilions in the short to medium term without compromising future provision for a 'higher capacity' transport service.

We trust that the NTA will have due regard to this submission when considering the detailed design aspects of the Swiftway project.

We confirm that Tempore would be available to meet with the NTA to discuss their particular concerns and to discuss viable solutions to addressing same.

We would be grateful for a written acknowledgement of this submission in due course.

[redacted]

To whom in may concern,

I wish to submit my objection in respect of the proposed Swiftway Bus Rapid Transit – Swords/ Airport to City Centre, with particular emphasis upon the selected emerging preferred route for the BRT from the R132 at the Estuary Roundabout through the Glen Ellan distributor Road to the proposed terminus in Oldtown.

This section of the proposed route flies in the face of due diligence in respect of proper planning and assessment of local transport objectives and requirements as set out by an elected body for an area, which in turn will lead to unnecessary and unacceptable impacts upon the receiving environment.
While the Route Options Assessment Report assesses transport planning policy documents in respect of the proposed scheme, and states in its conclusion (Section 2.8) that 'The need for the scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North. BRT is identified as serving this purpose and allowing key development areas such as Swords to continue to develop in advance of this'. The route selected does not take account of the transport objectives within the Fingal Development Plan 2011 to 2017 or the specific objectives of the Oldtown – Mooretown Local Area Plan (LAP).

Within Section 6.2 of the Route Options Assessment Report, where the stage 1 assessment is carried out, a specific route option should have been assessed in accordance with the Key Transport objective of the Oldtown – Mooretown Local Area Plan, i.e. Section 3.2.7 of the LAP 'Quality Bus Network'. This quality bus network route was based upon an Integrated Traffic Model which was prepared for Swords as part of the document 'Your Swords, An Emerging City, Strategic Vision 2035'. The absence of this route which would have been in accordance with Fingal County Councils transport policy for the local area, shows an absence of proper planning assessment within the Route Selection process.

The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellen Road extension, in particular in respect of Section 3.2 'Movement Strategy and Transportation Infrastructure', where section 3.2.5 'Glen Ellan Main Street' of the LAP sets out the proposed objectives of the LAP for the Glen Ellan Road. The LAP objective is for a 6m carriageway with cycle facilities, 4m wide footpaths and 1.5m wide tree lined verges, whereas the BRT is proposing 13m wide carriageway with 2m wide shared surface cycle facilities, 2m wide footpaths and the omission of the tree lined verges. While Section 6.3.2 of the Route Options Assessment Report references the LAP, it then proceeds to disregard the requirements and objectives of the LAP without taking due cognisance of it as a constraint upon the proposed scheme.

Through breaching specific objectives of the LAP, e.g. Key Objectives Transport 'Redesign the Glen Ellan Road Extension so that it's function changes from a distributor road to a main street, which will serve 2 schools, a large park and Local Centre, in addition to dwellings' the proposed route as planned will have a direct and unacceptable impact upon the existing properties which bound the Glen Ellan distributor Road in respect of noise, air quality, road safety, transport integration, landscape and visual.

Through the planned frequency of buses along this route at 4 minute intervals during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of such duration that it will be in breach of Statutory rights of the residents in accordance with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe), which will subjected to the unacceptable levels of noise.

As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not taken into account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.

At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together and Gaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.

Added to this is the increased road safety issue which would have been identified had a Stage F road safety audit been carried out as the site lines at the estate entranceways are proposed to be substantially reduced due to the increased carriageway width and the proposal to replace the existing footpath/ verge/ segregated cycletrack (circa 5m) with a 2m footpath.

Finally, in response to the economic appraisal carried out as part of this route assessment and in particular the emphasis in the reliability of the journey time in promotion of the BRT. It is of note that while the BRT may replace and improve upon existing public buses, there already exists a private express bus service, serving the Glen Ellan distributor road which provides sufficient frequency and reduced travel times in comparison to the public bus service. As such there could be no appreciable cost benefit in spending money on a service to double up and compete with that already in place.

Whereas should the final section of the BRT follow that proposed within the Oldtown – Mooretown Local Area Plan and the report, 'Your Swords, An Emerging City, Strategic Vision 2035' it would complement the existing transport provisions to the Swords Area, improving the service to a catchment area not already served by a reliable express service and it may make economic sense.

[redacted]

[redacted]

[redacted]

[redacted]

Dear sir or madam

I am writing to object to the proposed swiftway bus route. As a resident of castleview estate and as a parent who has children in the gaelscoil the proposed route will cause many delays in an already congested area. The loss of parking at the school is unacceptable and I also believe that building it so close to 2 schools is dangerous for the 900 pupils that attend them not to mention the loss of footpath space along the route.

Please note my objections to your proposed route.

[redacted]

[redacted]

[redacted]

In regards to the proposed route for swift way, as a resident of the castle view estate I have to object to this going ahead the roads around castle view and Glen Ellen are already at bursting point. The amount of traffic that already goes through these roads is ridiculous and with the opening of the schools in the area over recent years and the new housing estate currently being built in Millers glen the traffic is set to increase further more. This area would come to a complete stand still if work was to go ahead on this route. Major Disruption would be caused for residents along this route and increase the already ridiculous traffic problem.

Before any swift way route is built the current state of the roads and the traffic going through it need to be addressed first as these roads were simply not designed for the current volume of traffic.

Please accept this email as my objection to this route being constructed

[redacted]

[redacted]

Good afternoon,

Please find enclosed my submission regarding the Bus Rapid Transit Swiftwat Proposal for Swords to Dublin City Centre.

Kind regards,

Cllr Duncan Smith

--
Cllr Duncan Smith

Labour Party Councillor
(Swords, Donabate, Portrane, Meakstown, St Margarets, Rolestown, Killsallaghan, Turnapin, Santry)

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[redacted]

Submission Bus Rapid Transit "Swiftway"

Cllr Duncan Smith (Labour Party Swords)

[redacted]

To whom it may concern,

As a local Councillor for Swords and resident of the Castleview Estate, I wish to submit my concerns and objections in respect of the proposed Swiftway Bus Rapid Transit – Swords/ Airport to City Centre, with particular emphasis upon the selected emerging preferred route for the BRT from the R132 at the Estuary Roundabout through the Glen Ellan Road to the proposed terminus in Oldtown. The views and concerns outlined below are a reflection of a consultation process I engaged in with my fellow residents in North West Swords in particular over the past number of weeks.

I knocked on doors, dropped information leaflets and requested views to be sent to me via email and social media in order to gauge as wide a view as possible of local people to this proposal. A number of concerns and objections were raised and I would ask that they be taken on board by the NTA in respect of the Bus Rapid Transit (hereafter Swiftway) proposal.

(1) Parking impact at Gaelscoil Brian Boroimhe and Swords Educate Together.

At present, the necessity is for many parents to drive to either primary school in order to leave and collect their children. There are approximately 900 pupils attending these two schools and there is on-street parking for approximately 50 cars at present. Parents currently park long the existing road and walk their children the rest of the way into the respective schools. Parents themselves admit this is not ideal, however the Swiftway proposal as it is currently constituted would wholly remove this option without providing any alternative for parking or set down facility. This would leave parents with no option to bring their children to school except for private bus hire which is not an option for many. Swiftway itself would not provide an alternative for parents as many of them live outside the immediate vicinity of North West Swords with many pupils coming from all over Swords, rural villages such as Ballyboughal and Rowlestown and Donabate. It is not satisfactory to state that the parking consideration of the school is not within the remit of the Swiftway proposal. A project of this size and scope needs to engage with all public and private bodies including schools and Local Authorities even at this preliminary stage. The absence of any parking plan for the school patrons is major problem and a ground for objection to the current proposal.

(2) Widening of the Glen Ellan Road

The existing proposal would necessitate the widening of the existing Glen Ellan Road from two lanes to four lanes, with the two outside lanes dedicated to the Swiftway and public transport vehicles. This element of the proposal is central to its impact on our community in North West Swords. The Glen Ellan Road is the primary road connecting the estates of North West Swords. It is a well landscaped road and is lined with semi mature trees. For a community that is still relatively new, this road is a positive aspect and shared link which we all use on a daily basis as our primary ingress and egress to

our area. Crucially, it is in proportion with the surrounding area in its width and associated landscaping. The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellan Road, in particular in respect of Section 3.2 'Movement and Strategy and Transportation Infrastructure', where section 3.2.5 'Glen Ellan Main Street' of the LAP for the Glen Ellan Road. The LAP objective is for 6m carriageway, with cycle facilities, 4, wide footpaths and 1.5m wide tree lined verges. The Swiftway proposal is contains a 13m wide carriageway with 2m wide shared cycle facilities, 2m wide footpaths and the removal of the tree lined verge, which is most important to the visual aspect of this central road. Section 6.3.2 of the route options assessment report references the LAP, it then proceeds to disregard the requirements and objectives of the LAP without taking into account its constraint upon the proposed scheme. The impact on the Glen Ellan Road is invasive and would be out of proportion to the community it serves. It is a major ground for concern and objection to this proposal.

(3) Ingress and Egress for existing estates along the Glen Ellan Road

We currently experience problems exiting estates, particularly at peak times and school times, due to the existing high volume of traffic. In the current proposal, many access points for estates, including Castleview, Bride's Glen, Bunbury Gate, South Bank, Glen Ellan and Sandford Wood, would be altered without due provision for traffic management at these points. The crossing of a dedicated Swiftway bus lane, before joining the regular traffic lane, without clear traffic management signals is a real safety concern for residents.

(4) Altering of boundary walls for existing estates

The proposal as it stands would necessitate the "pushing back" of existing estate boundary walls by varying amounts depending on estates. This would negatively impact on open, green spaces in the existing estates such as Castleview, Bunbury Gate, Bride's Glen, Glen Ellan and Sandford Wood. Currently, the green space behind the boundary walls, give some manner of distance from the existing road. However, not only would the road become wider, and traffic frequencies become greater and louder, there would be less space between homes and this noise/traffic. This is a particular problem for the estates mentioned above and highlighted below:

- In Sandford Wood, the road would come perilously close to existing houses which are currently closer to the GE Road than any other home or building. According to the plans, the swiftway buses would be travelling within feet of this house. It would be too close to this house.
- In Glen Ellan, the ribbon of green space at Glen Ellan Park is already at a steep gradient sloping downwards to the existing boundary wall. Any further pushing back of this wall would make the existing slope even steeper and essentially rendering it useless as a green space for amenity or children's play.
- In Bunbury Gate, Bride's Glen and Castleview, the pushing back of the boundary wall would remove large tracts of the existing green space with houses on Castleview Lawns for example having no green space at all between their front door and the GE Road (these houses do not have a front garden so the existing green space in front of the boundary wall is extra important to retain).

(5) The closing of Jugback Lane to vehicular traffic

The closing of vehicular traffic to Jugback Lane cannot be implemented without due regard to the St Finian's Community School. Whilst the existing junction is not ideal, the intersection between Jugback Lane and the Glen Ellan Road provides a vital release valve for school traffic. Focus should be placed upon improving it and making it safer for vehicles and pedestrians. The closing off of this junction would mean there was only one vehicle access point to St Finian's CS (from the South through Watery Lane). There are no turning points on Jugback Lane so school-time traffic would go from being very busy, to being chaotic. This would have knock on effects to traffic on Watery Lane and the Rathbeale Road, both very important commercial roads for Swords.

(6) Skate Park in Balheary Park

The Swiftway proposal as it currently stands would necessitate the removal of the Skate Park in Balheary Park. The Skate Park is a very important piece of social infrastructure which provides a positive focus for activity for many young people in Swords and the surrounding areas. The lack of certainty regarding where this Skate Park would be moved to is extremely worrying and further grounds for objection. There is concern from many users of the facility, which has not been assuaged by any existing element within the proposal, that the Skate Park would be removed and that at best there would be a significant delay in it being placed in another location close by or worse, that it would not be replaced at all. The Skate Park is too important a facility for there to be no certainty regarding its future and this is another grounds for objecting to the proposal as it currently stands.

Conclusion

The public transport deficit in Swords needs to be tackled and I as a commuter myself understand that. I am in favour of improved bus networks however, only in the cases when those operate on existing roads and serve as wide an area as possible ie all of Swords including outlying estates such as Knocksedan which at present receive no bus service whatsoever either public or private. The need for dedicated lanes for a Swiftway service is understandable for the main arterial roads into Dublin City Centre such as the R132, M1, and Airport Road through Drumcondra. However it is not appropriate, in keeping or needed for the residential neighbourhood of North West Swords and those estates which border the Glen Ellan Road. A Swiftway Service or light rail service to serve Swords through the main arterial road networks and corridors and which could be accessed by foot and public bike scheme by commuters would be more adequate and would not impact on any residential community in such an invasive way.

I trust his submission will be taken in good faith and its contents are considered as constructive points against the proposal as it currently stands.

Yours sincerely,

_____

Cllr Duncan Smith

[redacted]

[redacted]

I would like to formally register my objections to the proposed Bus Rapid Transit on the following grounds:

- Safety - this is a wholly residential area, with many many families who walk, run, walk their dogs, walk their children to the schools that are directly in the path of the proposed route. This would jeopardise the safety of the children, their parents, walks, runner etc
  Parents frequently drive their children to and from school and park outside it. Where would they park with the bus service running? There would simply be no space for a bus service. And the Swiftway representative's response to my concern "the council would have to sort something out". Something??? Has someone told the Council that they have to "sort" it out?
- Congestion - it is already impossible to enter/exit the estate at peak times. Are you seriously thinking that you can run up to ten buses at peak hour and have no increase in the congestion. No resident will ever be able to get in and out of the estate
- Increase in traffic volumes - ten buses at peak times, starting at 5am. What do you think this will do to the residents in the area, particularly those with small children trying to sleep?
- Pollution - you can have the most effective buses in the world, but there still will be an increase in pollution, which will affect all the residents particularly the children
- Removal of green spaces - the green spaces are part of our estate, who are Swiftway to decide that because it suits them, they can just remove them without the agreement of the residents
- Transport options - our area is already WELL represented by Bus Eireann and the privately owned Swords Express. We do not need another bus service. The need simply isn't there. And providing bus services to users in other locations by sacrificing our estate is simply not acceptable.

I cannot stress strongly enough about how much I object to this proposal and will be making my feelings known to my local councillors and politicians.

[redacted]

[redacted]

To whom it may concern,

I wish to register my objections to the Swiftway bus service proposed route starting at Oldtown/castleview.

My primary reasons for objecting include:
- safety concerns for local residents and the two schools near the terminus based on bus volumes, lack of parking at the school forcing parents to park in the nearby housing estates, increased traffic with inadequate pedestrian crossings, night link safety concerns and night time noise affecting sleep
- neighbourhood and environmental concerns such as the removal of green space in our estate, added congestion due to no park and ride and no parking on roadside near schools, environmental impact including additional littering and removal of nature greenery.

[redacted]

[redacted]

To whom it may concern:

I am writing from Royal Oak Residents Association about the Swiftway Bus Rapid Transit project. Royal Oak estate is located on the border between Fingal and Dublin Council Area and consists of 350 houses approximately.
The residents are in overall support of the project as it will improve access time to Dublin City Centre.

However, we do have some concerns about the impact of the project on our community and the day to day movement of residents. I have outlined them under the following headings : Pedestrian issues / Vehicular issues / Future proofing

Pedestrian issues:

a) Pedestrian crossing on M1/Oscar Traynor Road/Old Coolock Lane Roundabout at Santry.

At the moment, pedestrians are not taken into account on this roundabout. There are a few signs erected advising motorists that pedestrians cross but these are not prominent and road markings that were put in place following representations to Fingal County Council to narrow the entrance on the motorway are long gone. Children cross the motorway entrance/exit twice daily to get to the Gaelscoil Cholmcille on the Oscar Traynor Road, others use it later to get to the Astro Park. Then, residents from Woodlawn use the crossing to get out to the Swords road to access bus routes to the City Centre. The road is extremely busy at most times during the day and traffic is very fast. This is added to at weekends with Santry Demesne being a large local attraction. From a meeting with Fingal County Council, we understand that this junction was to be wired to add in pedestrian crossings, work was undertaken a few years ago.

b) We see that there is a pedestrian crossing on the plans across Coolock Lane at the junction Royal Oak / Oak View. We cannot emphasise the importance of this enough. This has long been needed as no existing pedestrian crossing exists.

c) From the plans, it seems that the junction turning from the Swords Road to Coolock Lane is to change. We want to make sure that the excellent current access to Santry Demesne is still readily accessible to pedestrians. This crossing is very popular at all times and especially during the Summer for anyone using the leisure facilities in the park.

d) The plans show that there will be additional landscaping required opposite the Knightswood houses. We would ask that this is properly completed and takes into account those living along this stretch of the BRT.

Vehicular issues:

a) It appears from the plans that one lane on the M1/Oscar Traynor/Coolock Lane Roundabout will be turned into the BRT only lane. We fear that this will have a massive impact on traffic accessing the motorway and the Oscar Traynor road from Coolock Lane. There are fears that there will be difficulty getting in / out of the estate due to traffic backing up on this route.

b) We would ask that a filter light or additional time is given at existing traffic lights to allow the residents of Oak View and Royal Oak/Knightswood to get in and out of the estate and to access their homes. This will reduce the frustration that may arise with residents being unable to access their home resulting in drivers take chances to cross a road now with the added danger of BRT.

c) There are fears of the impact of a new junction between the roundabout and the Royal Oak estate entrance will have on traffic build up on a limited stretch of the road.

d) From the plans, it seems that there will be reduced parking available at the existing Centra/Fast Fit shops on the inner road at the corner of Swords Road/Coolock Lane. We would ask, what are the plans for parking in the area ? With the BRT stop where it is, we feel it is an ideal location for those wishing to access the service from Coolock and others travelling along the M50 into town and feel that this area may become an unofficial 'park and ride' without proper provisions. This is further aggravated by large events in Morton Stadium which currently involve Garda resources to regulate traffic

Future Proofing :

a) Plans from Dublin City Council involve building 700 houses on the green area off the M1/Oscar Traynor Road/Coolock Lane roundabout, also known as 'St Laurence's' we would ask that this be taken into account under the new plans for the BRT. It may be a more suitable location for the Santry Stops.

[redacted]

Sandra Curtin
Chairperson
Royal Oak Residents Association
39 Oak Green,
Royal Oak, Santry, Dublin 9.
Tel: 087 2227056

[redacted]

Dear Sirs,

Please see the attached letter.

Domhnall Ó Scanaill,
Ó Scanaill & Co.,
Solicitors,
Columba House,
Swords,
County Dublin.

Ph - 01 8137500
Fax - 01 8402290

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Ó SCANAILL & CO.
SOLICITORS

[redacted]

Our Ref: 162/14.dós.ck

National Transport Authority,
Dún Scéine,
Iveagh Court,
Harcourt Lane,
Dublin 2.

By registered post
& by e-mail - info@swiftway.ie

Re: Our Client - Conor Ó Scanaill, Practising as Ó Scanaill Veterinary Hospital Pinnock Hill, Swords, County Dublin
Re: Your Reference - 5xc0002
Re: Swift Way BRT - Swords/Airport to City Centre Scheme.

Dear Sirs,

We refer to your letter of the 8th ult. addressed directly to our above named client, which we understand was hand-delivered to his Veterinary Practice by your agents ARUP. Our client has examined the indicative map presented by ARUP, with particular reference to how the proposed scheme might impact upon him, his property and most especially his professional livelihood.

Whereas we appreciate that the scheme in question is only at design stage, we are very surprised that our client's views were not sought by you or your agents in advance of preparing this design drawing. If our client had been afforded that courtesy he and his advisors could have made it very clear to you the drastic impact your proposed design would have upon his premises, business and livelihood.

The purpose of this letter is to state in unequivocal terms that our client is vehemently opposed to the proposed design as it effects his premises. Our client has no objection in principle to the scheme, but its proposed impact upon his property and livelihood is such that our client will be forced to oppose the scheme at every level and opportunity. If the scheme were to proceed as designed for the Pinnock Hill roundabout area it would have *inter alia* the immediate effect of putting our client out of business, with the loss of his livelihood and that of his twelve employees.

[redacted]

From a planning and traffic management point of view our client finds it extraordinary that your design proposes the replacement of the Pinnock Hill roundabout with a junction controlled by traffic lights. As an observer of the traffic congestion that already exists at that roundabout, this writer is very surprised that such a proposal could have the backing of professional Town Planners and Traffic Management Consultants.

In that regard we would be obliged if you could make available to us now copies of the reports, surveys and other data prepared and collated by the Town Management Consultants and Traffic Management Consultants engaged in this project to date. Any correspondence in that regard should be addressed to this firm on behalf of our client, and all contact with our client should also be made via this office.

Finally we place on record our client's categorical objection to the proposed design of the scheme at and around the Pinnock Hill roundabout, and we put you on notice that we shall be objecting on behalf of our client throughout, for so long as the scheme contains the currently proposed design of the Pinnock Hill roundabout and environs.

Yours faithfully,

Ó Scanaill & Co.

Ó SCANAILL & CO.

Ó SCANAILL & CO.
SOLICITORS

[redacted]

Our Ref: 162/14.dós.ck

[redacted]

National Transport Authority,
Dún Scéine,
Iveagh Court,
Harcourt Lane,
Dublin 2.

By registered post
& by e-mail - info@swiftway.ie

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Re: Your Reference - 5xc0002
Re: Swift Way BRT - Swords/Airport to City Centre Scheme.

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Columba House, Airside, Swords, County Dublin. • D.X. 91001 Swords
Tel: 813 7500 • Fax: 840 2290 • E-mail: dos@scanlaw.ie

Domhnall Ó Scanaill, B.C.L.
Regina O'Brien, B.A.
V.A.T. No. IE 5090314B

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Yours faithfully,

O Scanaill & Co.

Ó SCANAILL & CO.

[redacted]

Dear Sir,

Please find attached soft copy of Submission on Swords BRT prepared on behalf of Dublin Town.

The uploader on the Swiftway website was not working this evening.

Yours faithfully,

Richard Hamilton

Richard Hamilton
Planning Consultant

McCutcheon Halley Walsh

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Swiftway, Swords/Airport to City Centre BRT Proposal –

Pre-Submission Consultation - Stakeholder Submission

by

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Town Planning & Engineering Consultancy Services by

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consulting engineers

McCutcheon Halley Walsh
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[redacted]

Executive Summary

Dublin City Business Improvement District trading as *Dublin Town*, is pleased to make this submission on the proposed Dublin Bus Rapid Transit (BRT), and in particular the Swords to City Centre Route. *Dublin Town* and its members are fully supportive of investment in an improved public transport infrastructure for Dublin. Almost 80% of people visiting Dublin City Centre use modes of transport other than the motor car. It is therefore, in the interests of Dublin city centre that more people opt for sustainable modes of transport including public transport, walking and cycling. International trends would give us hope for optimism that the shift towards these sustainable modes of transport will gather pace.

Dublin Town has a mandate to develop and promote the economic advancement of Dublin City Centre. *Dublin Town* works on behalf of the 2,500 businesses in the central city area to create an attractive, welcoming, vibrant and economically successful space in Dublin City Centre. The contribution of the businesses in this area to the exchequer is of the order of €1Bn. per annum. The goal is to position Dublin City Centre as the location of choice for retail, leisure and business activity. Dublin Town has developed a number of initiatives to create an inviting city; ensuring a safe and secure city and have developed a marketing and communications plan to promote the city centre to Dubliners and visitors alike.

Dublin City Centre – Vision and Policy

The draft National Transport Authority (NTA) transport strategy for the Greater Dublin Area (April 2012) highlights the demographic and economic growth that is driving the need for new infrastructure, and the importance of BRT in addressing that demand. It notes that the population of the Greater Dublin Area grew by 19% in the ten year period between 1996 and 2006 and 8.3% between 2006 and 2011. Employment grew by 40% between 1996 and 2006. Both population and employment are expected to grow by 39% in the period from 2006 to 2030

While the NTA report includes 'Landuse Integration' as an evaluation criteria, there is insufficient consideration of the function and future development of Dublin City centre's streets. In particular, the weighting and evaluation of alternatives does not have regard to City Development Plan policy or the retail, economic and civic function of O'Connell Street as the 'Civic spine' of the city centre.

In particular we highlight the policies of the Dublin City Development Plan 2011 – 2017 and *Your City Your Space: Dublin City Public Realm Strategy (2012)*. The city plan clearly states that the Civic Spine (including O'Connell Street and Westmoreland Street) ***are the most important series of streets and spaces in the city and as such the quality of the public realm is exemplary and of the highest international standard.***

In terms of Retail, the City Plan sets out a hierarchy of Principal Shopping Streets which again highlights the primacy and importance of O'Connell Street for the city as a 'category 1 street', on a par with Grafton Street and Henry Street (Fig. 1).

We also reflect that in planning and regeneration terms, the 1998 Integrated Area Plan (IAP) for O'Connell Street was the start of a new phase in the life of the street and city centre regeneration with integrated design for pedestrians; reduced traffic movement; created a civic space at the GPO.

Overall, like all major cities there is great competition for space on the primary thoroughfares, and Dublin is following international best practice in supporting a Civic core for pedestrians, cyclists and public transport. However, there is a great risk that the investment in improving the quality of our primary streets will be undermined if we return to heavily trafficked streets – be it private or public vehicles. There is a risk of denigration of pedestrian amenities on O'Connell Street and Westmoreland Street to give the appearance of a "transport corridor", instead of the more desirable and more pedestrian friendly city centre "plaza". This would be contrary to the city's vision and policy for a 'Civic Spine'.

International Examples

As part of this submission, we have reviewed examples of BRT schemes from around the world. It is clear from international examples that BRT services can be extremely successful if implemented correctly. The critical factors for a successful BRT include:

- High levels of segregation with "BRT only" dedicated infrastructure
- Off board ticketing to reduce dwell times
- Traffic signal priority and no compromise with other traffic
- High levels of frequency
- Park & ride / bicycle parking facilities provided at stops

It is clear however from a review of the proposed Swords to City Centre BRT route that a number of issues which have been demonstrated to undermine BRTs have not been fully addressed. These include:

- No segregation from other traffic and busses (this is particularly apparent throughout the city centre, where BRT services are compromised, the knock-on effects of which are likely to be felt throughout the network)
- Poor connectivity between multiple bus and transport networks (route is further from Bus Aras and Connolly Station than other routes considered)
- Poor integration with bicycles and pedestrians. It's apparent that an attempt has been made to "squeeze" both a BRT and cycle route along an already constrained corridor, at the expense of a diminished level of service for both modes.
- Lack of provision of Park and Ride facilities in the hinterland to provide people with an "easy choice" of taking public transport.
- Lack of dedicated BRT infrastructure, such as grade-separated fly-overs at junctions, and compromise with existing traffic, for example where roundabouts are retained, results in reduced level of BRT service and risk of the system being undermined by traffic congestion.
- It has been stated that the BRT will only meet short to medium term demand levels, therefore the long term objective of light rail or Metro will be required. The avoidance of dedicated infrastructure noted previously, as well as minimising the diversion/relocation of services to reduce costs in the short term inhibits the potential for conversion to light rail system in the future, resulting in significantly increased long term costs.

As the Dublin BRT is to be a semi open system there is a risk that some of the failings of the Zuitanngent BRT (Amsterdam) will not be appropriately addressed with the Dublin BRT schemes, i.e. compromised infrastructure through the provision of mixed use BRT/traffic lanes leading to delays and falling patronage.

Cycle Lanes

It is proposed to provide a high-quality cycle route along the BRT route, however in significant sections the existing corridor constraints results in compromised provision, with substandard shared cycle/pedestrian spaces and shared BRT/traffic/bus lanes. This will result in a compromised level of service for both the BRT and cyclists. To address this issue the proposed BRT should seek to provide alternative cycle routes not alongside or in BRT lanes.

Route Options Assessment

From the Route Options Assessment Main Report it is proposed that the Gardiner Street route had similar journey times (7-8 minutes), the same capital/operational costs, serving similar attraction and population/employment catchments and a less potential for environmental impacts. The Gardiner Street route scored worse due to apparently having a worse integration between transport modes and cycle network. Additionally it was ranked lower on road safety due to having one more left turning movement. It is noted however that Gardiner Street is a short walk to O' Connell Street and its proposed transport stop, and is in

fact closer to key national transport hubs of Connolly Station and Bus Áras. It is also contended that any issues relating to integration with the cycle network and road safety could be addressed in the detailed design stage. As noted previously it would be favourable to provide a separate cycle route in any case, rather than attempting to "squeeze" both down a narrow corridor, resulting in compromised provision for both. In summary, the Route Options assessment does not present a robust case to suggest that the O'Connell Street route is the best route. Indeed, our analysis suggests that Gardiner Street presents several advantages.

Design Issues

The proposed Swords to City Centre BRT will encounter many design problems throughout the entire route which may affect the overall BRT level of service. If not addressed the issues raised will affect the frequency (2 minute headway), capacity, right of way of the BRT, signal priority and overall quality of the BRT route.

There is a lack of BRT segregation or dedicated infrastructure: throughout significant sections on the route. It is evident that the BRT lanes will be a shared space, open to other bus services, cyclists and potentially taxis. In a number of sections through the city centre, the BRT has no separation from outside traffic. The shared use of the lane, with other buses, cyclists, taxis, deliveries, private cars etc. etc. will invariably compromise the level of service of the BRT, increase journey times poses a significant risk to the overall BRT investment.

Significant revision of the existing traffic flow system, particularly in the southern Georgian quarter of the city, will be required to facilitate the BRT route as indicated. No detail has been provided in relation to future traffic flow routes, therefore we would query whether access to member's premises, for staff, customers and delivers, has been considered.

Capacity

Dublin Town fully acknowledge the potential benefits of BRT for Dublin as a means of enhancing bus transport in the short to medium term, however we would consider a rail option from Swords and the airport as a necessary long-term requirement, and interim options to deliver this important infrastructure must be explored.

The capacity of the Swords to City Centre BRT route is expected to be 3,600 passengers per direction per hour. In order to achieve this capacity a headway of 2 minutes would be needed (30 vehicles every hour). The projected travel time of 35 minutes from Swords down from the current 65 minutes. This improvement is very welcome. However, by comparison the Metro North was due to carry 20,000 people per hour based on 90 metre trains every two minutes. Therefore, it important that Metro North remain as key transport objectives for the city. Indeed, a further extension of the Luas light rail system which utilises the Metro Reservation above ground (from DCU out of the city, and link to Luas Cross City in Cabra or Broombridge) is worthy of further consideration as a means of utilising the investment in Luas Cross City.

It is also important for the city at this early stage of the scheme design, that we ensure the optimum transport solution can be achieved, and that the preferred route proposed is best for Dublin's city businesses. It is clear that there are many flaws in the Route Options Assessment Report presented by the NTA. There is no clear rationale for supporting the O'Connell Street / Westmoreland Street Option as the preferred route, and indeed this proposal presents serious problems for the city's primary Civic spine, and the businesses and retailers located in the area. It is clear that the Gardiner Street option presents a better alternative for the city.

Dublin Town will continue to work on behalf of its members to proactively respond to the proposed Dublin BRT so that short-term challenges can yield long-term benefits for the city centre. The proposed Dublin BRT can have significant benefits for residents, the city as a whole and the city centre businesses. These benefits can only be realised if the BRT is implemented correctly, free from issues and essentially utilising ideas from international best practice BRT examples.

1. Introduction

Dublin City Business Improvement District trading as *Dublin Town*, is pleased to make this submission on the proposed Dublin Bus Rapid Transit (BRT), and in particular the Swords to City Centre Route. *Dublin Town* and its members are fully supportive of investment in an improved public transport infrastructure for Dublin. Almost 80% of people visiting Dublin City Centre use modes of transport other than the motor car. This is in contrast to our competitor locations where almost 80% of patrons travel by motor car. It is therefore, in the interests of Dublin city centre that more people opt for sustainable modes of transport including public transport, walking and cycling. International trends would give us hope for optimism that the shift towards these sustainable modes of transport will gather pace.

Dublin Town fully acknowledge the potential benefits of BRT for Dublin as a means of enhancing bus transport in the short to medium term, however we would consider a rail option from Swords and the airport as a necessary long-term requirement, and interim options to deliver this important infrastructure must be explored. It is also important for the city at this early stage of the scheme design, and we ensure the optimum transport solution can be achieved, and that the preferred route proposed is best for Dublin's city businesses.

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This submission report has been prepared on behalf of *Dublin Town* by JB Barry Consulting Engineers, and McCutcheon Halley Walsh Charted Planning Consultants. The purpose of the report is to provide informed town planning and engineering analysis to review the National Transport Agency's proposals for a new high capacity Bus Rapid Transit corridor from Swords into the city centre. The report will also look at international BRT best practices from around the world and examine the factors affecting both a successful and unsuccessful BRT scheme, and how these factors apply to the proposed Swords to City Centre route. It also highlights the character and function of the streets where BRT is proposed, and the planning policy context that seeks to implement a vision for the city centre environment.

This report will highlight particular concerns for Dublin Town that capacity of BRT is not sufficient to support the city's needs, and could denigrate pedestrian amenities on O'Connell Street and Westmoreland Street to give the appearance of a "transport corridor", instead of the more desirable and more pedestrian friendly city centre "plaza". The NTA's Route Options Assessment Report does not provide a robust case for the use of BRT on O'Connell Street/Westmoreland Street, and any development of the proposal in future should actively reconsider Gardiner Street as the preferred route.

1.1 BRT Overview

The Swords- Dublin City Centre proposal emerged from the draft National Transport Authority (NTA) transport strategy for the Greater Dublin Area (April 2012). This transport strategy maintains that DART Underground and Metro North are medium term priority objectives to be delivered between 2017 and 2026. However, it is clear that budgetary constraints are impacting on this delivery programme, and that BRT has emerged as a potential short-term response to improve public transport service on the Swords/Airport – City Centre corridor in a relatively short timescale.

[redacted]

There are various different types and interpretations of BRT, It can range from a quality bus corridor (QBC) to being a fully guided, fully segregated bus system. Swiftway will be the name of the BRT service in Dublin. The three proposed corridors to be developed as Swiftway routes are:

- Blanchardstown to UCD
- Clongriffin to Tallaght
- Swords to City Centre

The Blanchardstown to UCD and Clongriffin to Tallaght are currently indicative route corridors, pending consultative input and further analysis and development. The draft National Transport Authority (NTA) transport strategy for the Greater Dublin Area for the period up to 2030 includes various measures in relation to BRT. The three BRT routes will be a high quality form of bus transport which is similar to Luas type operations. Its features include:

- Modern, attractive multi-door vehicles
- Uses own BRT lane or shared Bus/BRT lane
- BRT vehicle given priority at traffic signals
- High quality stops and level boarding on and off vehicles
- Off-board ticketing (tickets purchased in advance or Leap cards)
- Conveniently located stops with optimal spacing

1.2 Purpose

This report will pay particular attention to the Swords/Airport to City Centre route. This proposal will seek to improve transport services to the Airport and Swords, but will also have an impact on city streets, and demand more space for bus transport. The review will be undertaken of the whole Swords to City Centre route and the many challenges which face this route. Additionally a further detailed review will be undertaken of the southern extent of the route, beginning on Dorset Street, finishing at the end of the route on Earlsfort Terrace. This south end of the route contains many of the business represented by Dublin Town.

In order to complete the purpose of this submission, a number of tasks have been undertaken. These included;

- A review of retailer survey response information relating to the BRT proposal, collected and collated by the Dublin Town team.
- A review of international best practice and benchmark proposals. Which will include BRT schemes in the UK and France and well known international examples. An analysis of these proposals will be undertaken in order to determine if the schemes are successful, and if they indicate whether the Dublin Scheme is appropriate.
- A review and summary of detailed proposal drawings and all technical information available on Swiftway.ie
- The BRT proposal will be benchmarked in terms of capacity of vehicles, impact on streets, and population catchment. The route selection and robust justification for route alternatives will be anticipated.
- Alternative that should be considered including a link from Luas Cross City in Cabra or Broombridge to the Metro line reservation (at grade) to Dublin airport.
- At the peak rush hour period it has been suggested that Expressway buses linking the Swords with the city should use the Port Tunnel with integrated ticketing. Buses exiting the Port Tunnel can easily link up with the Luas Red Line.

1.3 Key Drivers

The draft National Transport Authority (NTA) transport strategy for the Greater Dublin Area (April 2012) highlights the demographic and economic context for the transport proposals, and the importance of BRT in addressing that demand.

- It notes that the population of the Greater Dublin Area grew by 19% in the ten year period between 1996 and 2006 and 8.3% between 2006 and 2011. Employment grew by 40% between 1996 and 2006. Both population and employment are expected to grow by 39% in the period from 2006 to 2030
- Whereas job growth has also taken place in the Hinterland, most jobs are still located within the Metropolitan area of Dublin, with office based jobs particularly focussed in or close to the city centre. Forecasts up to 2030 assume the large majority of GDA jobs (85%) will continue to be located in the Metropolitan area, with a particularly strong growth in jobs anticipated in the Dublin city centre.
- Over the next ten years or so an additional 40,000 to 50,000 additional people travelling into the city centre each morning – an increase of about a quarter over current numbers;
- The city will not be able to accommodate that number of additional commuters travelling by car – they will mainly have to be accommodated on public transport;
- A number of our key bus corridors, such as the Swords to City Centre corridor, will reach capacity over the next few years.
- To increase the public transport capacity we either go for a rail solution such as Metro North, which is probably a decade away or more, or we more towards a BRT type service which has about 50% more capacity than a conventional bus service;

[redacted]

2. Dublin City Centre – Vision and Policy

The Swiftway Route Option Assessment Report assesses multiple route options through the city centre. However, while the NTA report includes 'Landuse Integration' as an evaluation criteria, it is presented through a transportation lens, and not function and future development of Dublin City centre's streets. In particular, the weighting and evaluation of alternatives does not have regard to City Development Plan policy or the retail, economic and civic function of O'Connell Street as the spine of the city centre.

BRT is not included as a Transport Objective in the current Dublin City Development Plan 2011 - 2017 as passed by the elected members of Dublin City Council. Even in transportation documentation terms, this BRT proposal has only been introduced in the latest transport strategy.

In this section we therefore highlight the function and primacy of the streets BRT is proposed to use, as a business and retail destination and place. This in the context of whether the best route has been advanced in the NTA's proposal. In particular, we focus on the civic spine of the city O'Connell Street – Westmoreland Street and Dame Street.

Dublin City Centre has benefitted from a progressive approach to transportation in the city, which can be traced back to publication of the Dublin Transport Initiative (DTI) report in 1995, and the establishment of the Dublin Transportation Office to continue the on-going transport planning process for the Greater Dublin Area. The first update of DTI was published in 2001 in the DTO report 'A Platform for Change' and this has continued to evolve through Transport 21 and the Greater Dublin Area Draft Transport Strategy 2011 to 2030. This far-sighted approach to transport planning has had a transformative impact on the city centre over time.

2.1 Dublin City Development Plan, 2011-2017

The City Development Plan sets out the following vision for the city;

> ***Within the next 25 to 30 years, Dublin will have an established international reputation as one of the most sustainable, dynamic and resourceful city regions in Europe. Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, a vibrant culture and a diverse, smart, green, innovation-based economy. It will be a socially inclusive city of urban neighbourhoods, all connected by an exemplary public transport, cycling and walking system and interwoven with a quality bio-diverse greenspace network. In short, the vision is for a capital city where people will seek to live, work and experience as a matter of choice.***

A key part of delivering this vision is associated with the improvement of the City's environment and experience to residents, visitors and businesses. This is a goal shared by *Dublin Town* as a positive image and experience is a crucial part of building the economy for *Dublin Town* members in the city centre.

The Plan prescribes a hierarchy of key spaces and connections in the city centre which establishes O'Connell Street and College Green as part of the Civic Spine of the city "Major Strategic Pedestrian Route" (Fig. 5 of the City Plan)

[redacted]

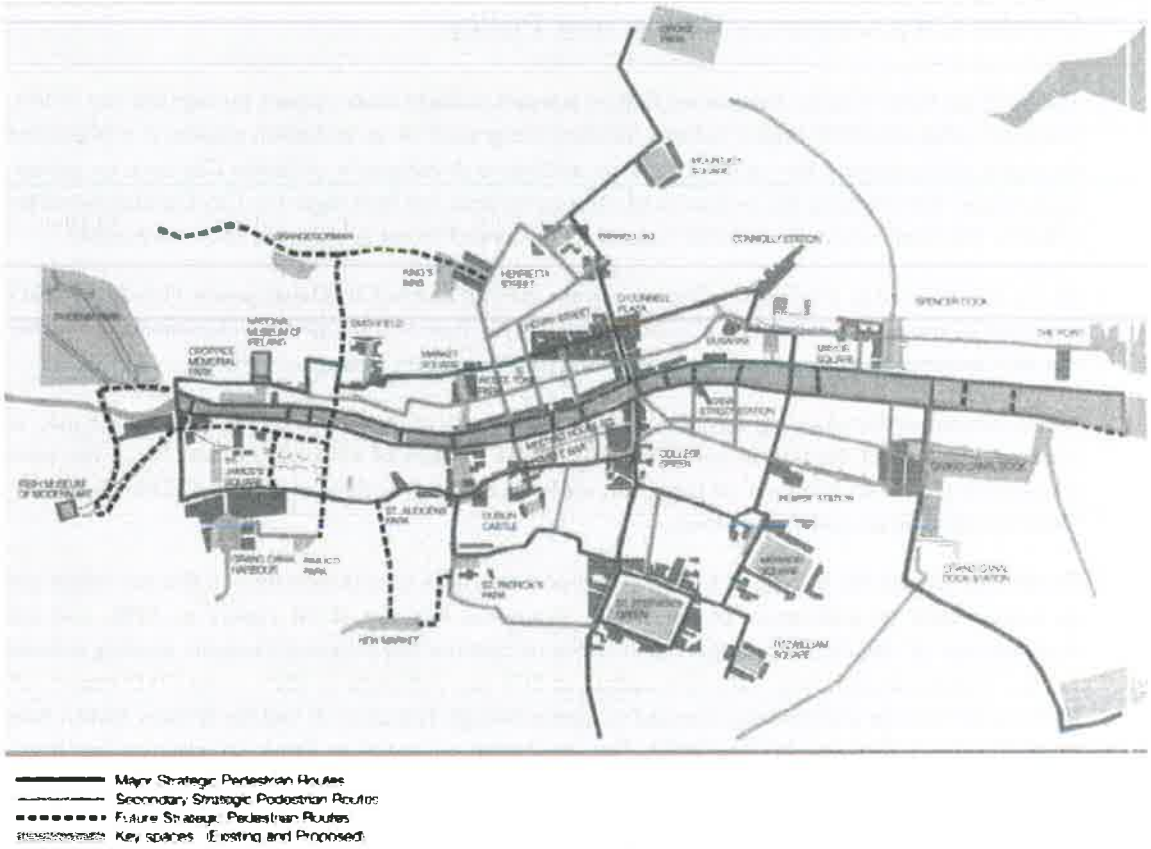


Fig.1 Dublin City Development Plan, Figure 5 Making a Legible City – Key spaces and Connections

The designation of the core pedestrian, and public spaces is closely associated with the economic function of the city in the surrounding areas, and in particular the retail function of the city. The Plan sets out specific objectives to protect and enhance the retail core in association with the general improvement of the city centre as a cohesive product. Objective RD01 sets out the objective;

> ***To implement the environmental and other improvements set out in the Retail Core Framework Plan such as improving facilities for pedestrians, a high quality street environment and better links between the shopping area and new routes, with the refurbishment and extension of the key pedestrian street network including the re-paving of the Grafton Street pedestrian spine and Liffey Street Upper and Lower (All environmental and public realm improvements to be prioritised under the Public Realm Strategy)***

Figure 18 of the City Plan defines the **Principal Shopping Streets (p. 152)** which again highlights the primacy and importance of O'Connell Street for the city as a 'category 1 street', on a par with Grafton Street and Henry Street (Fig. 1).

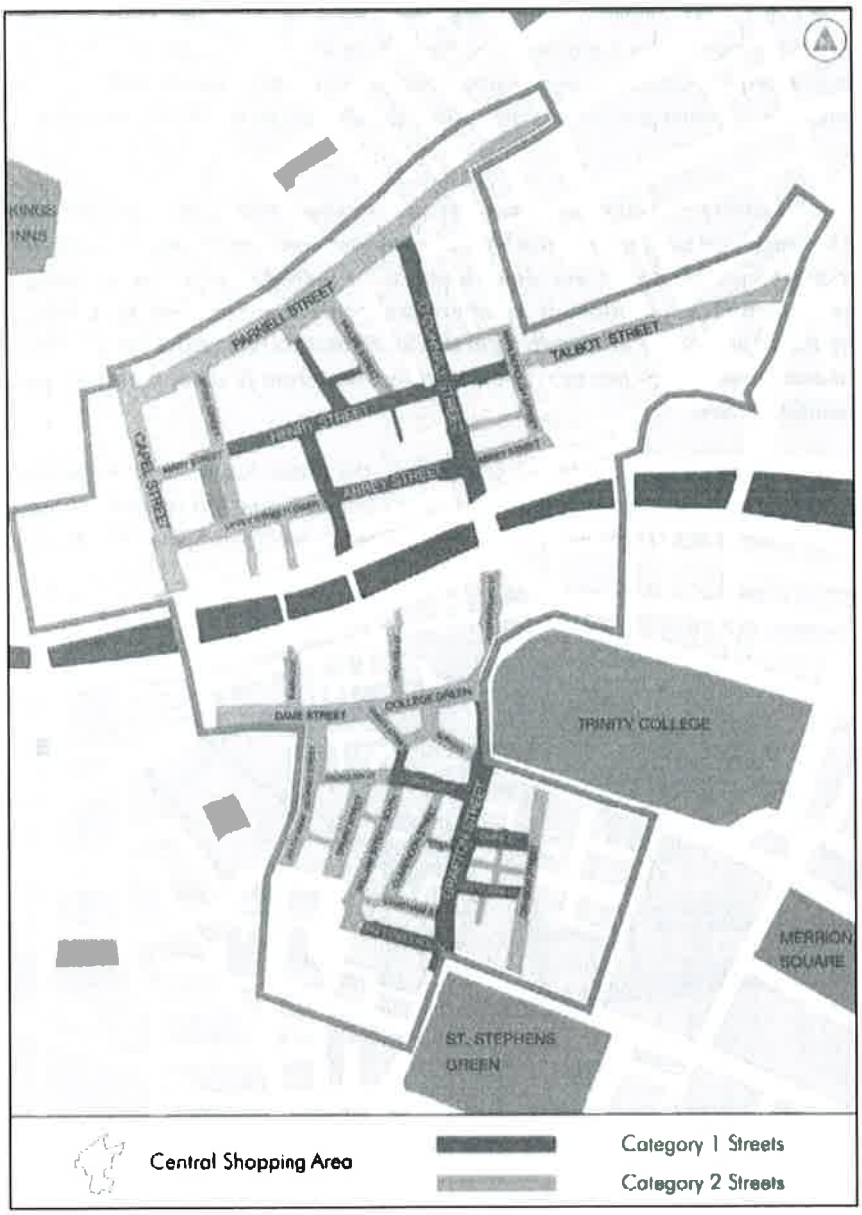


Fig. 2 Dublin City Centre Retail Hierarchy

2.2 Your City Your Space: Dublin City Public Realm Strategy

An eloquent and ambitious policy document that encapsulates that role of the city's principal streets, the Public Realm Strategy is an implementation document that sets out the standards and ambitions for the City's public spaces and how they are to be used. It states at section 1.1:

> ***The Public Realm is an important part of Dublin's identity, of how we understand ourselves and how we want to present ourselves to others. It contributes to Dublin's competitiveness both by influencing the image of the city abroad and by being attractive for people who live in, work in, or visit. The public realm is vital to our city life and this importance requires us to understand it and influence its future through developing vision, appropriate policy and a collaborative approach with people at its centre.***

Dublin Town plays a key role in maintaining and cleaning public spaces, as well providing Street Ambassadors to assist visitors and provide information on Dublin's main streets. *Dublin Town* has played a key role in improving the visitor experience, which supports improved footfall, which in turn supports retail confidence, demand and investment. This is reflected in the following Public Realm Strategy statement:

> ***Dublin's identity is inseparable from the user's experience of the city. Our everyday history, our heritage and culture, and the impact of innovations are all around us in the public realm. It is where we go about our daily business as individuals as well as being an arena for recreation and celebration. It is where we can come together to participate in public activities of all shapes and sizes: from the St. Patrick's Day Festival to the Dublin Marathon; weekend farmers' markets to one-off marches; and from families meeting in parks to tourists on walking tours.***

In common with the Dublin City Development Plan, the Public Realm Strategy defines a hierarchy of streets according to their function and stratus. O'Connell Street, Westmoreland Street, and College Green are positioned at the top of this hierarchy, defined as the 'Civic Spine' (Fig. 3)

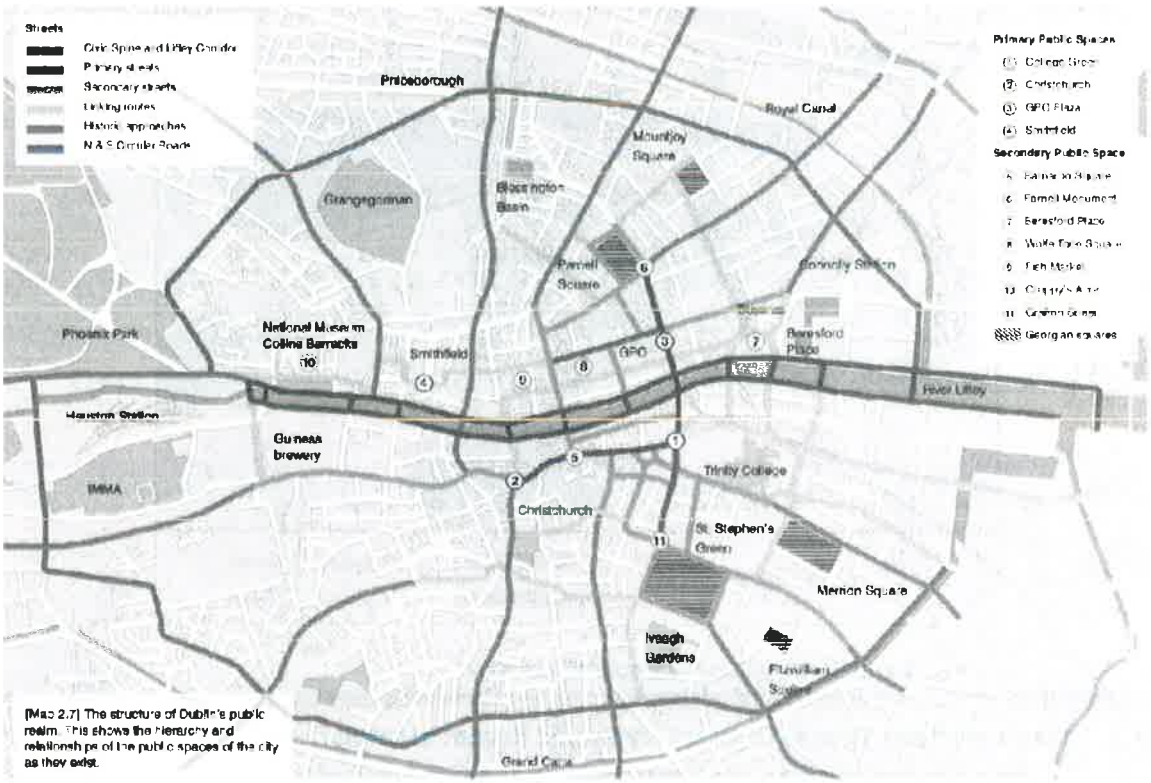


Fig.3. Dublin's hierarchy of public spaces and streets

The strategy elaborates upon the meaning of the Liffey Corridor and the Civic Spine in Table 2.1:

> ***The Liffey Corridor and the Civic Spine are the most important series of streets and spaces in the city and as such the quality of the public realm is exemplary and of the highest international standard. The public realm is coherent and consistent in design, and constructed using the highest quality materials creating a pleasant environment in which it***

is easy to move around. A mix of activities are accommodated which make the Civic Spine a key attraction nationally.

2.3 O'Connell Street Integrated Area Plan

The Public Realm Plan cites the 1998 Integrated Area Plan (IAP) for O'Connell Street as the start of a new phase in the life of the street and city centre regeneration with integrated design for pedestrians; reduced traffic movement; created a civic space at the GPO; and replaced the missing Nelson's Pillar with The Spire.

The plan was to rejuvenate the street to have a strong and dynamic relationship between the quality of its architecture and the uses to which it is put. The IAP aimed to create an environment that allows O'Connell Street to live up to its role as the main street of Ireland's capital city. Millions of Euro were invested in street to serve the following objectives;

- To radically improve the environment for pedestrians.
- To create a perception that the street is safe and secure.
- To generate a sustainable mix of building uses.
- To secure refurbish and the future of Georgian buildings on Parnell Square West.
- To create strong linkages between O'Connell Street and other areas, especially with other integrated area plans, e.g. Historic Area Rejuvenation Project (HARP), North Inner City Integrated Area Plan.
- To achieve sustainable uses for under-used and vacant buildings in the environs of O'Connell St.
- To draw Parnell Square into a more dynamic relationship with O'Connell Street.
- To achieve a quantum leap in the design and presentation of public spaces.

Achievements to Date

- The Spire has been constructed.
- O'Connell Street has been completely refurbished. This has included:
- Laying new carriageways for vehicles
- Widening footpaths and plant street trees
- Upgrading public lighting
- Installing specialist street furniture
- All monuments have been restored and cleaned to their original condition.
- A new central median/pedestrian area has been constructed from O'Connell St Parnell St.
- A new Civic Plaza has been created outside the GPO, for use during celebrations.

Other Achievements

- Numbers 4 and 8 on Eden Quay have been refurbished.
- A new Jury's Inn hotel has been constructed on Parnell Street.
- Work has commenced on the refurbishment of the ILAC centre.

Therefore, the IAP has served to completely re-position O'Connell Street, and change its character from a poor quality urban roadway, to a civic plaza. This project has involved sustained effort over 15 years which are reflected in the current City Development Plan and Public Realm Plan. This also must be placed in the context of the HGV ban from the city centre with the opening of the Dublin Port Tunnel.

[redacted]

3. Review of international BRT implementation

As of October 2014, 186 cities in all continents have implemented BRT systems.[1] A number of well-known international examples of BRT systems around the world will be reviewed in this section. The first of these examples will be a large, well-received BRT example, ranking highly in BRT standards. The other examples will be BRT models similar in size to the proposed BRT Dublin. An overview of these BRT systems will be given along with an indication if the scheme is successful or not. An overview of the critical success factors, and how these apply to Dublin, has been provided.

According to the Institute for Transportation and Development Policy (ITDP)[2], a BRT is a high-quality bus-based transit system that delivers fast, comfortable, and cost-effective services at metro-level capacities. It is generally considered that most important factor in influencing the success of a BRT scheme is the type of operating plan; open or closed (ie. what level of segregation the BRT will include). Closed BRT systems are when a single service operates end to end similar to a Metro or Luas type systems. No other bus services or vehicles are permitted. An open system is where by all busses and cyclist are allowed use the BRT lanes.

The ITDP indicate that a BRT system will need to include a number of the following elements:

- Dedicated Right of way (significant part of their journey within a fully dedicated right of way (busway) to avoid traffic congestion).
- Busway Alignment (Centre of roadway or bus-only corridor).
- Off board fare collection (to reduce boarding and alighting delay related to paying the driver).
- Intersection Treatments (prohibiting turning for traffic across the bus lane and signal priority, reduces delays).
- Platform Level boarding (The station should be at level with the bus for quick and easy boarding).

3.1 Guangzhou BRT (China)

Guangzhou BRT is the bus rapid transit system of the city of Guangzhou in the People's Republic of China. The line was opened in February 2010. The system consists of a 22.5 kilometre corridor of fully segregated rapid bus lanes with a capital cost of $146 million. The BRT has an extremely large daily ridership with approximately 1,000,000 passenger trips daily, with 26 stops. At peak times it has a BRT bus volume of 350 vehicles per hour in a single direction, or roughly one bus every 10 seconds[3]. The BRT lane is provided in the centre of the road, thereby affording unhindered priority to the BRT and avoiding conflicts with side road junctions and commercial activities which would lead to delays and a reduction in the level of service.

The Guangzhou BRT has been an overwhelming success due to a number of reasons;

- The construction of the BRT in the middle of the road segregated from other traffic
- Extremely low headways between vehicles
- Bicycle Parking at BRT stops
- High quality station design

[1] http://www.brtdata.org/
[2] Institute for Transportation and Development Policy (ITDP): International organisation promoting sustainable and equitable transportation worldwide.
[3] http://www.chinabrt.org/en/cities/guangzhou.aspx

The Institute for Transportation and Development Policy report[4] has concluded that the BRT has helped reduce traffic congestion, improve travel times, improve efficiency of the city's bus system, increase the use of public transport and alleviate overcrowding. The system will also provide a 79% return on investment and bring about an estimated reduction in CO2 emissions by 45,000 metric tons in Guangzhou. Despite operating at a far larger size and scale than the Dublin BRT, similar concepts of quality, dedicated infrastructure and user friendly station designs can be implemented in Dublin.

3.2 Cambridgeshire Guided Busway (England)

The Cambridge guided busway is the longest guided busway in the world and was opened in August 2011.[5] The two segregated guided sections make up 16 miles (25 km) of the route. The remainder of the route is made of on road bus lanes. The bus uses a guide wheel against a guide kerb. The guide wheels allow the bus to keep straight along the narrow route at a fast and smooth pace. It also allows for careful positioning at slightly modified bus stops. The segregated guided BRT sections on the route allow for a narrower right of way taking up less road space, complete segregation from other traffic and improved drainage/ecology due to the green space in the middle of the tracks.

The original budget for the project was £116.2 million but due to contract disputes and time issues the final budget was in excess of £180 million. According to Cambridge County Council the scheme has been deemed a success despite its high costs. A total of 2,500,000 trips were made in the first year of operation, which was reported as 40% higher than the predicted figure. The scheme has helped reduce the number of vehicles on the nearby A14 road. During construction special consideration was given to improving the ecology and environment for the wildlife along the route. The guided BRT has been designed to allow maximum accessibility to persons with limited mobility. The segregated design has bought about reliable, fast and frequent journeys. The main reasons for the BRT success are;

- Segregated routes providing dedicated BRT infrastructure
- Disability friendly, quality designed stops
- Well-spaced out stops.

The Swords to City Centre BRT route needs to apply these critical success factors by providing segregated infrastructure to allow reliable and fast journey times.

3.3 Nantes Busway Line 4 (France)

The Nantes Busway (line 4) is a bus rapid transit line operating in France, opening on November 6, 2006. The route is a segregated BRT lane 7km long with 15 stations. [6] Due to the expected increase in passenger numbers on the current Nantes public transport system, a solution was required. A BRT system was chosen due to the low implementation costs and the possibility for rapid expansion. The Nantes Busway was implemented at a cost of €7.5 million per kilometre.

The BRT has been a huge success with over 30,000 daily passengers.[7] During peak times, the headway between busses is as low as 3-3.5 minutes. Similarly to other BRT designs, the segregated route allows for faster, more reliable journey times. The introduction of park and ride at various stations has increased the potential passengers. The BRT has had a positive impact on the traffic volume on adjacent roads. The volume of traffic on the adjacent Vertou to the centre of Nantes route has fallen significantly from over 55,000 passenger cars per day (2006) to just 26,000 passenger cars per day. If ridership continues to grow, plans are in place to convert Busway line 4 into a Tramway line, which is possible due to the

[4] http://ccap.org/assets/CCAP-Booklet_ChinaTransport.pdf
[5] http://www.bbc.co.uk/news/uk-england-cambridgeshire-14401265
[6] http://www.bhns.fr/IMG/pdf/BHNS_Nantes.pdf
[7] http://brt.mercedes-benz.com/content/media_library/brt/mpc_brt/home/services/flyer_2012/cities/en/3223_nantes_uk_final.object-Single-MEDIA.tmp/3222_BRT_Nantes_eng_FINAL_2013-09-20.pdf

segregated design of the route. This concept is strongly recommended to be taken on board in the Dublin BRT designs. Similar park and rise systems would also work well in the Swords and Drumcondra areas. Overall reasons for the BRT success include;

- Segregated, middle of the road route
- The introduction of 4 park and ride stations
- Potential conversion into light rail

It would be prudent to adapt the key success factors of the Nantes scheme, such as segregated dedicated infrastructure, park and ride facilities in the Dublin BRT designs. Additionally provision of a BRT scheme which facilitates easy adaption to a light rail system is also recommended.

3.4 Zuidtangent BRT, Amsterdam (Netherlands)

The Zuidtangent BRT is a bus rapid transit service between Haarlem and Amsterdam. Planning began for the Zuidtangent BRT in 1987. Due to a shift in town planning, an increase in road network congestion, a poor city wide public transport system and the presence of a major international airport. The first route was opened in 2002, 41 km long with a capital cost of €270 million. In core sections of the route (24km) bus lanes and independent busways are provided, elsewhere bus lanes are provided where possible. There is a long average distance between stops, 1.9km. The BRT was designed and built to enable future conversion to light rail. A second route was introduced in 2007, where similar concepts of the first route was not fully applied. There were large area of unsegregated lanes and many of the BRT stops were poorly designed.[8]

The initial service provided 8-10 buses/hr in both directions during peak times. This led to, 32 000 passengers per day on an average working day with the heaviest loadings in Hoofddorp, 13.500 passengers per day (both directions). The service has been a success for Amsterdam due to high commercial speed, high service frequency, high flexibility, high reliability, an increase in public transport use in the city and patronage is over 99% higher than estimated figures. The introduction of park and ride facilities at stops were also deemed a success. However several problems have been noted including; poor design of BRT stops due to physical guidance at some stops being blocked, weather protection at stops not satisfactory and slippery surface at stops. The implementation of ITS was delayed for some years and punctuality was not always satisfactory due to the mixed traffic lanes in several sections. In 2011 the BRT became BHLS (Bus with High Level of Service) with more separate lanes, an increased bus priority at traffic lights and only key routes developed as BHLS. The Amsterdam BRT routes were clear examples of when dedicated BRT infrastructure with well-designed stops can become a big success. Whereas failure is inevitable if BRT infrastructure is compromised and stops are designed poorly.. In conclusion the reasons for success were;

- Segregated BRT routes
- Well-designed BRT stops
- High commercial speeds

However, reasons for failure in certain area were;

- Mixed use BRT/traffic lanes
- Poorly designed stops
- Low commercial speeds

As the Dublin BRT is to be a semi open system, similar problems and issues may occur. There is a risk that some of the failings of the Zuitanngent BRT will not be appropriately addressed with the Dublin BRT

[8] "EXPERIENCES WITH BHLS IN THE AMSTERDAM REGION" David van der Spek (Engineers Ireland Roads & Transportation Society & CILT BRT Seminar)

schemes, i.e. compromised infrastructure through the provision of mixed use BRT/traffic lanes leading to delays and falling patronage.

3.5 Barcelona BRT (Spain)

The Barcelona BRT was an improvement and rearrangement of the Barcelona bus network to create a network of bus rapid transit. The original system catered for 650,000 trips per weekday, using 1,165 buses. The original system was highly valued but had severable problems[9]; it had good links only from the city centre to the outskirts, the system was less efficient system due to redundant routes, too many resources were spent to increase patronage, the layout was old and had not been updated since 2001. An upgrade was introduced creating more connectivity and efficiency between all the bus networks in and out of the city.

The upgraded bus network was a success for a number of reasons.

- Original, redundant routes were remodelled which allowed for maximum connectivity, between routes, demand oriented areas were targeted.
- More routes were given segregated BRT lanes with priority at signals.
- The new network achieved far greater efficiency than the older network. Buses operated at a high frequency (5-8 min) at peak times with stops every 400m.
- The network is gradually expanding with 4-5 new routes every year.
- The new network introduced many additional amenities which are required for BRTs including, real time information, smart shelters and off board fare collection.

It is apparent from the Barcelona scheme that wholescale changes to the existing Dublin Bus regime will be needed. Sharing the BRT lanes with other bus routes will compromise speed and efficiency of the BRT and undermine the overall level of investment. Existing bus routes which currently utilise the proposed route should be rationalised or removed and replaced with radial feeder buses.

3.6 Overview of Critical Success Factors

It is clear from the above examples that if a BRT is implemented correctly is can be an enormous success. As noted previously the most important factor in influencing the success of a BRT scheme is what type of operating plan it will have; open or closed (ie. what level of segregation the BRT will include). Closed BRT systems are when a single service operates end to end similar to a Metro or Luas type systems. No other bus services or vehicles are permitted. An open system is where by all busses and cyclist are allowed use the BRT lanes. All of the above successful BRT systems implement a closed system through all or a significant part of the route. The above BRT examples also indicate many other features which are key to the success of a BRT network, these include;

- Off board ticketing
- Traffic signal priority
- High levels of frequency
- Park & ride / bicycle parking facilities provided at stops

A number of barriers and weaknesses which have been identified in BRT systems include;

- No segregation from other traffic and busses
- Poor connectivity between multiple bus and transport networks
- Stop spacing too low (low operational speed)

[9] "Barcelona's New Bus Network" Josep Mension (Engineers Ireland Roads & Transportation Society & CILT BRT Seminar)

- Stop spacing too high (smaller catchment area)
- No traffic signal priority
- Poor station stop design with no amenities
- Poor integration with bicycles and pedestrians

It is clear from the above that the proposed BRT system in Dublin, which provides an "open" system, with only partial segregation and compromised "mixed-running" through the city centre, with no park and ride facilities, fails to address these critical success factors.

4. Overview of Proposed Swords to City Centre BRT Route

The National Transport Authority (NTA) proposes the Dublin BRT will seek to provide an improvement on current bus services that will deliver a higher capacity on existing busy bus corridors and provide an attractive alternative to car transport, with fast and reliable journey times. The capacity of the Swords to City Centre route is expected to be 3,600 passengers per direction per hour. In order to achieve this capacity a headway of 2 minutes would be needed (30 vehicles every hour). A summary of the catchment details for both the residential population and employment population of the Swords to City centre route is shown in Table 1 below. The information was gathered from the Route Options Assessment Report.

Table 1: Residential and Employment Population Catchments

Walk Distance from Swiftway Stop	Residential Population	Employment Population
0-5 minutes	24,900	52,000
5-10 minutes	49,000	81,900
10-15 minutes	61,900	49,800
15 minutes (total)	91,700	183,700

The NTA intend the Dublin BRT to create the similar benefits as the international best practice BRT projects mentioned above such as reduced traffic congestion and an improved public transport system. Stated advantages of BRTs include that they are relatively quick to commission, cost-effective to install and less intrusive during the construction phase compared to light rail or underground alternatives.

4.1 Potential Issues

As discussed in section 3.6, the most important factor influencing the success of a BRT scheme is the level of segregation. The proposed Dublin BRT will use a semi open system where multiple authorised services can use the BRT route (frequently conventional buses). The more open a BRT route is, the more likely the performance of the service will suffer. Finding the right balance for the operating plan level is vital to the success of the Dublin BRT with investment undermined if not implemented correctly. It was clear from the international examples that sites where an open, unsegregated BRT was provided, resulted in compromised service and failed to achieve the consistently high level of BRT standards required.

A second important factor in influencing the success of a BRT is the quality of stops and distance between them. The proposed Dublin BRT will implement similar stop amenities to successful international BRT services. These include; off board ticketing systems, LED time displays, raised platforms and similar platform fit outs to light rail systems. Dublin BRT has proposed a stop spacing of 800m which will allow for a large catchment area and less time wasted stopping and starting. This stop spacing is similar to other international examples such as Guangzhou BRT (860m), Cambridgeshire (1000m) and Nantes (500m). Furthermore signal controlled priority for BRT's at junctions is a significant factor. Dublin will need to prioritise traffic control signals to ensure preferential treatment of buses at junctions.

It is proposed to provide a high-quality cycle route along the BRT route, however in significant sections the existing corridor constraints results in compromised provision, with substandard shared cycle/pedestrian spaces and shared BRT/traffic/bus lanes. This will result in a compromised level of service for both the BRT and cyclists. To address this issue the proposed BRT should seek to provide alternative cycle routes not alongside or in BRT lanes.

In order for the proposed Dublin BRT to work, it will need to implement all of the above factors mentioned which can influence the success of a BRT service. Utilising these key features from well-known international BRT examples can be a vital part in the success of the Dublin BRT.

4.2 Route Selection

A number of route options had initially been examined for the city centre section of the BRT route. This section of the route was split into two parts; firstly traveling from the Royal Canal to the Liffey, and secondly travelling from the Liffey to a suitable location in the south of the city centre to turnabout. A number of possible streets and roads were identified, analysed and decided upon if suitable for the BRT. Appendix B contains several images of the routes discussed below.

Two of the potential routes proposed for the first section of the BRT were travelling on Dorset Street onto O' Connell Street or travelling on Dorset Street onto Gardiner Street and BusAras. The O' Connell Street route was chosen due to the following reasons[10];

- The lower capital cost and operation and maintenance cost compared to other route options;
- It has low and reliable journey times (6-7 minutes);
- It better integrates with the existing and planned transportation network for the city;
- It is consistent with, and would deliver part of the GDA cycle network;
- It serves a higher number of key trip attractors and greater population and employment catchments; and
- While it ranks lower than some other route options with respect to potential for environmental impact, these impacts can be mitigated through design.

From the Route Options Assessment Main Report it is proposed that the Gardiner Street route had similar journey times (7-8 minutes), the same capital/operational costs, serving similar attraction and population/employment catchments and a less potential for environmental impacts. The Gardiner Street route scored worse due to apparently having a worse integration between transport modes and cycle network. Additionally it was ranked lower on road safety due to having one more left turning movement. It is noted however that Gardiner Street is a short walk to O' Connell Street and its proposed transport stop, and is in fact closer to key national transport hubs of Connolly Station and Bus Áras. It is also contended that any issues relating to integration with the cycle network and road safety could be addressed in the detailed design stage. As noted previously it would be favourable to provide a separate cycle route in any case, rather than attempting to "squeeze" both down a narrow corridor, resulting in compromised provision for both.

Similar issues were also noted in choosing a route from the Liffey to a suitable location to turnabout in the south of the city. The O' Connell Bridge – Pearse Street – Westland Row route option was chosen over a Butt Bridge - Talbot Memorial Bridge - Pearse St - Merrion Street route option for the following reasons[11]:

- The lower capital cost and operation and maintenance cost compared to other route options;
- The likelihood of being able to deliver shorter overall Swiftway route journey times and assurances on Swiftway service journey time reliability when compared to the other route options;
- It better integrates with the existing and planned transportation network for the city;

[10] NTA: Swords/Airport to City Centre, Route Options Assessment, Volume 1: Main Report
[11] NTA: Swords/Airport to City Centre, Route Options Assessment, Volume 1: Main Report

- It serves a high number of key trip attractors and large population and employment catchments; and
- While it ranks lower than one other route option with respect to potential for environmental impact, it is considered that impacts can be avoided or mitigated through careful design

From the Route Options Assessment Main Report it is proposed that the Butt Bridge route option had the same capital and operational costs, as well as the same journey times. Furthermore it has a larger residential catchment, a far less impact in the environment and only a short 5 minute walk from the transport networks served by the O' Connell Bridge route.

The additional benefits of the considered route alternatives include;

- Avoiding O' Connell Street, where BRT/Bus/Luas/Traffic compromise in an already crowded location.
- Additional links with transport hubs of Bus Áras, Connolly Station and Tara Street Station.
- Services the Docklands SDZ which is forecast to experience significant growth in employment and residential in the medium term.

Based on the information provided in the Route Options Assessment: Main Report and research conducted it is submitted that the alternative route traveling via Gardiner Street, Bus Áras and Butt/Talbot bridge is reconsidered as the Preferred Route.

5. Detailed Review of Swords to City Centre BRT Route

5.1 Issues Impacting the BRT Level of Service

The proposed Swords to City Centre BRT will encounter many design problems throughout the entire route. These problems will have to be addressed in order to fully ensure the success of the BRT system. Firstly a number of issues have been identified which may affect the overall BRT level of service. These issues have been identified throughout the entire route. If not addressed the issues raised will affect the frequency (2 minute headway), capacity, right of way of the BRT, signal priority and overall quality of the BRT route. In addition the issues raised should also be considered in terms of adaptability in the future to a light rail system. Addressing these issues now will result in reduced costs in the future should light rail be reconsidered.

A detailed list of the issues identified and their map locations from the Proposed Scheme General Arrangement Drawings, are contained herein.

- Map 1-29 - allowing left turning cars on BRT lanes will result in delays.
- Map 3 - The right turn the BRT undertakes at the Swords Business campus, will result in delays to service if not given signal priority. If will be difficult to achieve a BRT headway of two minutes if other traffic manoeuvres are taken into consideration at this junction.
- Map 4 – The westbound BRT will have to cut across traffic at Balheary Road. If not signalised this manoeuvre will add to delays.
- Map 4 – The right hand turn manoeuver at the redesigned Estuary roundabout will add to delays. A grade separation design should be considered at this location, particular to enhance service provision and facilitate upgrading to light rail in the future.
- Map 7 – The proposed BRT crossing facility from median to lateral running on the Dublin Road will add to service delays as it is not signalised.
- Map 10 – Dublin airport roundabout has a large amount of traffic flow and the introduction of BRT/Bus only lanes may result in unacceptable delays to other road users. As the junction remains unsignalised any queuing in other traffic lanes has the potential to impact on the BRT through the junction. This junction should be redesigned to enhance BRT provision, for example by fully signalising, and care must be taken to ensure that both access to Dublin Airport and BRT is not compromised.
- Map 15/16 – Eastbound BRTs approaching the interchange must merge with normal traffic, resulting in increased potential for delays and reduced level of service.
- Map 21-22 – Existing congestion occurs along Drumcondra Road Upper and at junction with Griffith Avenue. The proposed BRT scheme represents no significant improvement on current situation with BRTs forced to share with left turning traffic with resultant risk of delays.
- Map 23 – Proposed BRT represents no significant improvement on current service on busy Drumcondra Road Lower. The existing bus stops to the east and west of Wellpark Avenue are provided in the BRT lane, therefore any other buses stopping will add to delays to BRT service.
- Map 25 –No BRT lanes or dedicated infrastructure provided on North Frederick Street and Parnell Square East will likely compromise the BRT service.
- Map 26 – No BRT lanes only shared traffic lanes on sections of O Connell Street will likely result in potential delays and compromise the BRT service.
- Map 27 – No BRT lanes only shared traffic lanes on Westmoreland Street and Westland Row will likely result in potential delays and compromise the BRT service.
- Map 28 – No BRT lanes on large parts of Merrion Square West will likely result in potential delays and compromise the BRT service.

- Map 29 – No BRT lanes on Hatch Street will likely result in potential delays and compromise the BRT service.

5.2 Detailed drawing review (Map 16-19)

A detailed review of the BRT route drawings in the city centre has also been undertaken. This review primarily focussed on the city centre as this area contains the businesses *Dublin Town* represents. An overview of the major problems which were identified throughout the course of the detailed drawings review are contained herein. In general the main problems identified were recurrent through the city centre section of the scheme. These main problems included:

- Lack of BRT segregation or dedicated infrastructure: throughout significant sections on the route, it is evident that the BRT lanes will be a shared space, open to other bus services, cyclists and potentially taxis. In a number of sections through the city centre, the BRT has no separation from outside traffic. The shared use of the lane, with other buses, cyclists, taxis, deliveries, private cars etc. etc. will invariably compromise the level of service of the BRT, increase journey times poses a significant risk to the overall BRT investment.
- Pedestrian Crossing: at a number of locations there is a lack of pedestrian crossings in particular in the vicinity of proposed BRT platforms.
- Directional signage: further emphasis is needed in the drawings on the location of directional signage. With the changes being made in traffic flows and road space, highlighting what vehicle manoeuvres are permitted or prohibited is of a significant importance.
- Cycle Lanes: Along the course of the route, cycle lane widths vary from 1.2m to 2m. It is recommended that all cycle lanes are at least 1.75-2m wide due to the high traffic volumes on these roads. These is also no consistency in the routes taken by cyclists. Cyclists are forced to weave in and out of bus stops and parked cars, moving from on road lanes to off road lanes and back again several times in the space of a few hundred meters. It is considered that attempting to "squeeze" both cycle and BRT infrastructure along an already constrained route results in a significant and unacceptable compromises for both modes. The BRT and cycle infrastructure should be provided along alternative routes to ensure adequate level of service is provided for both.
- Access arrangements: BRT lanes and stops result in reduced access to many side lanes and streets. It unclear on what the access arrangements will be for several of these streets, which will affect a number of businesses and residents.
- Significant revision of the existing traffic flow system, particularly in the southern Georgian quarter of the city, will be required to facilitate the BRT route as indicated. No detail has been provided in relation to future traffic flow routes, therefore we would query whether access to member's premises, for staff, customers and delivers, has been considered.

The four maps reviewed below are included with notation in Appendix A of the report. A number of the problems identified in the overall section have been identified in this section, as well as a number of individual problems identified below.

5.3 Dorset Street / Parnell Square (Map 16)

Problems identified include (refer to Appendix for problem locations);

1. Parked cars opening doors onto the cycle lane conflicting with passing cyclists.
2. Weaving cyclists conflicting with right turning vehicles resulting in conflicts.
3. Vehicles accessing side roads on Dorset Street Lower will conflict with BRTs resultings in delays and/or conflicts.

[redacted]

4. Bicycle lane diversion on Dorset Street Lower is unlikely to be utilised and moves through narrow residential roads.

5.4 O' Connell Street (Map 17)

Problems identified include (refer to Appendix for problem locations);

1. Little or no dedicated BRT infrastructure has been provided on O'Connell Street which will likely compromise the BRT service. BRTs will be forced to share space with existing traffic. There is a lack of clarity in how existing bus stops are treated. The location and layout of existing bus stops may impact negatively on BRT level of service.
2. The footpath at Aston Quay and Westmoreland Street is one of the busiest in Dublin City. Providing a cycle route along the footpath results in reduction on footpath width and associated safety problems arising from the potential for conflicts.
3. There are no cycle lane facilities on large parts of O' Connell Street. Shared BRT/Bus/cycle lanes results in both a compromised level of service for BRT which will be delayed behind slow moving cyclists, and also an unattractive environment for cyclists who will be competing for road space with large vehicles.
4. The shared traffic lane terminates abruptly at Princes Street North. It is unclear where vehicles are supposed to go after this section, or how premises further north are intended to be serviced.
5. Access to Henry Street is prohibited with only a BRT lane provided. This results in diminished service for deliveries etc. to these premises.
6. Vehicles turning left onto Earls Street North, Abbey Street Lower and Sackville Place will delay vehicles behind them as they will have to cross a BRT lane and cycle lane, resulting in reduced level of service for BRTs.
7. Section A-A does not match the image shown in the plan drawings.
8. Restricting vehicle access on O' Connell Street Upper or at the south end of Parnell Square East results in diminished service for deliveries etc. to all premises.

5.5 Westmoreland Street / Pearse Street (Map 18)

Problems identified include (refer to Appendix for problem locations);

1. The provision of a shared running lane on Westmoreland Street will likely lead to significant delays to all road users, including BRTs and Buses, and also delivery access etc to local premises. It is unclear how access is maintained to Fleet Street and the Temple Bar area. Fleet Street forms the main access spine for the area, facilitating delivery and emergency access.
2. No cycle lane facilities have been provided northbound on Westland Row. Significant volumes of cyclists in that area due to proximity with Trinity College. Shared BRT/Bus/cycle lanes results in both a compromised level of service for BRT which will be delayed behind slow moving cyclists, and also an unattractive environment for cyclists who will be competing for road space with large vehicles.
3. Bicycle lane moving eastbound on Pearse Street, which cuts across three lanes of opposing traffic, will require toucan signals.
4. Southbound cycle lane on Westmoreland Street suddenly stops before College Green. The intended route for cyclists wishing to continue southbound is not clear. Lack of dedicated cycle provision will increase risk of conflicts.

5. It is not clear how vehicular traffic accesses Westmoreland Street from College Green. If it is intended that all traffic uses the LUAS lines then there is a significant risk to both LUAS and BRT as the level of service of both will be severely compromised.
6. Similarly it is unclear how vehicle traveling on College Street are intended to proceed. If it is intended that all traffic uses the LUAS lines then there is a significant risk to both LUAS and BRT as the level of service of both will be severely compromised.
7. No BRT lane has been provided servicing the Westmoreland Street BRT platform stop. BRTs will be forced to share space with existing traffic which will likely compromise the BRT service.
8. The footpath and bus stops on Westmoreland Street are very busy throughout the whole day. Providing a cycle route along the footpath results in reduction in footpath width and associated safety problems arising from the potential for conflicts with cyclists.

5.6 Merrion Square / St. Stephens Green (Map 19)

Problems identified include (refer to Appendix for problem locations);

1. It is not clear how cars access the on-street parking on Earlsford terrace. Cars manoeuvring into these spaces will delay BRT services.
2. Bicycle lane in front of BRT Platform on Earlsford Terrace is not consistent with other BRT platforms and results in diminished service for both cyclists and BRTs.
3. Bicycle lane on Leeson Street Lower at 1.2m wide is below minimum standards.
4. Indicative streetscape views do not match plan drawings. It is therefore difficult to ascertain the level of impact of businesses and premises with any accuracy.
5. BRT lane only traveling northbound on Merrion Square West and on Ely Place. It is unclear how access is provided to service premises along these streets.

6. Alternatives Considered

Alternative City Centre BRT Routes

The preferred route presented in the NTA document which brings BRT down Parnell Square, O'Connell Street and Westmoreland Street is not supported by *Dublin Town*.

We have shown that both in policy and practical terms, this is the primary economic, retail and civic spine of the city, and its capacity as a public place must be protected.

The route options report does not provide sufficient evidence to suggest that this is best option, and as we have shown does not weight public policy, economic and retail impact in its consideration.

We have also highlighted that in engineering design terms, there are large number of problematic elements in the proposal. The O'Connell Street and Westmoreland Street alignments in particular give rise to a large number of conflicts with other road users, and shared alignments and compromises that will yield delays and increase journey times from that shown in the NTA report.

We submit that route alternatives that use Gardiner Street or Amiens Street are more desirable in terms of transport interchange and are less disruptive on the city's primary streets.

Dublin Port Tunnel

One possibility not explored in the route assessment is the potential to use the port tunnel to commuters from the Swords area at peak times into the city, where they could link up with the Luas red line. We note that the Madrid BRT system goes underground in the central urban area to reduce conflict with other street users, and improve the reliability and speed of the service.

Light Rail Alternative

The Swords BRT is proposed as a Medium Term route pending the implementation of Metro North, which remains as a primary objective of Transport Strategies and the Development Plan for the City. However, the financial burden of implementing the Metro does pose a realistic threat to implementing the high-capacity public transport route which is needed. BRT is supported as an interim measure, but its passenger capacity and need for street space do warrant serious consideration of brining other possibilities forward.

The capacity of the Swords to City Centre BRT route is expected to be 3,600 passengers per direction per hour. In order to achieve this capacity a headway of 2 minutes would be needed (30 vehicles every hour). The projected travel time of 35 minutes from Swords down from the current 65 minutes. This improvement is very welcome.

However, by comparison the Metro North was due to carry 20,000 people per hour based on 90 metre trains every two minutes. Therefore, it important that Metro North remain as key transport objectives for the city. Indeed, a further extension of the Luas light rail system which utilises the Metro Reservation above ground (from

DCU out of the city, and link to Luas Cross City in Cabra or Broombridge) is worthy of further consideration[12] as a means of utilising the investment in Luas Cross City.

The new Luas Cross City line could be extended across Dublin's northside to Finglas, Ballymun and Swords. This may involve the construction of a 2km Luas tunnel, which would provide a high capacity transport link for the northern suburbs of the capital. This proposal would have the advantage of utilising the capacity of that line, while making the most of the design and forward planning investment in Metro (for part of its route) and the development contributions collected from development for its implementation.

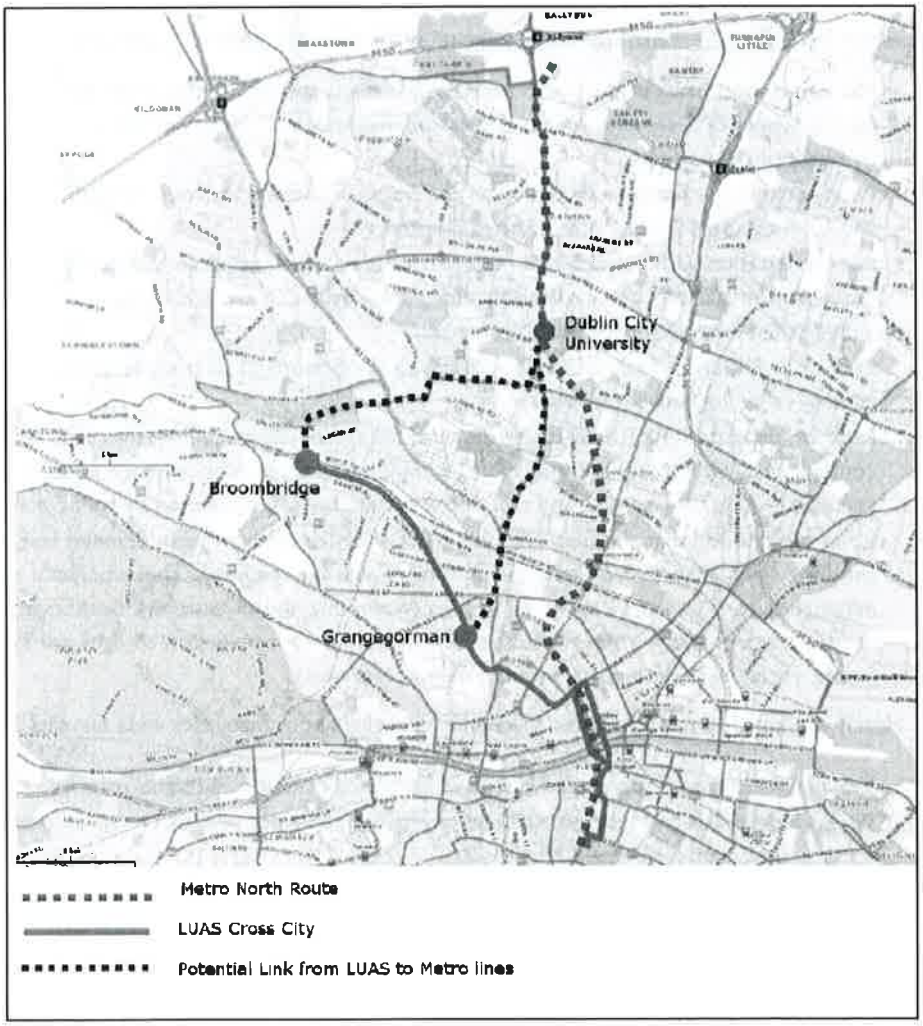


Figure 4 – Potential linkage from Luas Cross City line to Metro North alignment

[12] Irish Independent, 21/11/2014 Further-extensions-to-luas-lines-could-replace-stalled Metro North.

7. Conclusions

It is clear from international examples that BRT services can be extremely successful if implemented correctly. The critical factors for a successful BRT include:

- High levels of segregation with "BRT only" dedicated infrastructure
- Off board ticketing to reduce dwell times
- Traffic signal priority and no compromise with other traffic
- High levels of frequency
- Park & ride / bicycle parking facilities provided at stops

It is clear however from a review of the proposed Swords to City Centre BRT route that a number of issues which have been demonstrated to undermine BRTs have not been fully addressed. These include:

- No segregation from other traffic and busses (this is particularly apparent throughout the city centre, where BRT services are compromised, the knock-on effects of which are likely to be felt throughout the network)
- Poor connectivity between multiple bus and transport networks (route is further from Bus Aras and Connolly Station than other routes considered)
- Poor integration with bicycles and pedestrians. It's apparent that an attempt has been made to "squeeze" both a BRT and cycle route along an already constrained corridor, at the expense of a diminished level of service for both modes.
- Lack of provision of Park and Ride facilities in the hinterland to provide people with an "easy choice" of taking public transport.
- Lack of dedicated BRT infrastructure, such as grade-separated fly-overs at junctions, and compromise with existing traffic, for example where roundabouts are retained, results in reduced level of BRT service and risk of the system being undermined by traffic congestion.
- It has been stated that the BRT will only meet short to medium term demand levels, therefore the long term objective of light rail or Metro will be required. The avoidance of dedicated infrastructure noted previously, as well as minimising the diversion/relocation of services to reduce costs in the short term inhibits the potential for conversion to light rail system in the future, resulting in significantly increased long term costs.

It is clearly evident that a successful BRT scheme can bring about many city wide benefits[13], including;

- Travel time savings – segregated laneways, off board ticketing and signal priority.
- Green House Gas and local air pollutant emissions reductions – less reliant on private cars and more fuel efficient advanced BRT busses.
- Road safety improvements reductions in fatalities and crashes - reduces interaction with other vehicles and reducing on-the-road competition.
- Reduced exposure to air pollutants - cleaner vehicle technologies and fuels and efficient systems reduce time passengers are exposed to air pollution at stations.
- Increased physical activity– efficient systems increases passengers' willingness to walk to stations.
- Cost effective transport mode – can create economic benefits with a good cost benefit ratio.

The European Cooperation on Science and Technology (ECST) issued a report on buses with high levels of service and concluded that; *"The BHLS success stories are seen where town and country planning, land use and transport planning, and investments are tackled together and simultaneously."* The ECST also stressed the

[13] EMBARQ – "Social-Environmental-Economic-Impacts-BRT-Bus-Rapid-Transit"

importance of including stakeholders and politicians to ensure the successful implementation of the project.

As stakeholders *Dublin Town* recommend the following be addressed for both the proposed Dublin BRT network and also specifically in relation to the Swords to City Centre BRT route as presented:

- It has been stated that the BRT will only meet short to medium term demand levels, therefore the long term objective of light rail or Metro will be required. BRT routes and route corridors should therefore be identified and developed not only in relation to BRT, but in their capacity to be upgraded to light rail should the need arise. This will ensure the avoidance of redundant development and maximise value for the exchequer.
- Alternative should be considered which maximise the return of LUAS CrossCity at minimum cost to the exchequer.
- BRT routes should fully integrate with existing transport hubs. In relation to the Swords route it is recommended that a route which links Connolly Station and Bus Áras should be further examined.
- The future employment and growth area of the Docklands (SDZ) should be considered. Similarly an alternative route serving Connolly Station and Bus Áras would better serve the Docklands also.
- To ensure high levels of service BRT routes should have dedicated BRT infrastructure with compromises minimised. In this regard shared bus/traffic lanes should be avoided, for example on O'Connell Street and Westmoreland Street, where BRT services are compromised, the knock-on effects of which are likely to be felt throughout the network.
- Alternative cycle/BRT routes should be considered to avoid compromises to the level of service of both where insufficient land is available. A cycle route away from bus bus/BRT routes is likely to be more attractive to cyclists in any case.
- Access arrangement to premises should be carefully considered, including the preparation of a detailed traffic management plan which facilitates all assess requirements – for employees, customers and deliveries.

Overall, like all major cities there is great competition for space on the primary thoroughfares, and Dublin is following international best practice in supporting a Civic core for pedestrians, cyclists and public transport. However, there is a great risk that the investment in improving the quality of our primary streets will be undermined if we return to heavily trafficked streets – be it private or public vehicles. There is a risk of denigration of pedestrian amenities on O'Connell Street and Westmoreland Street to give the appearance of a "transport corridor", instead of the more desirable and more pedestrian friendly city centre "plaza". This would be contrary to the city's vision and policy for a 'Civic Spine'.

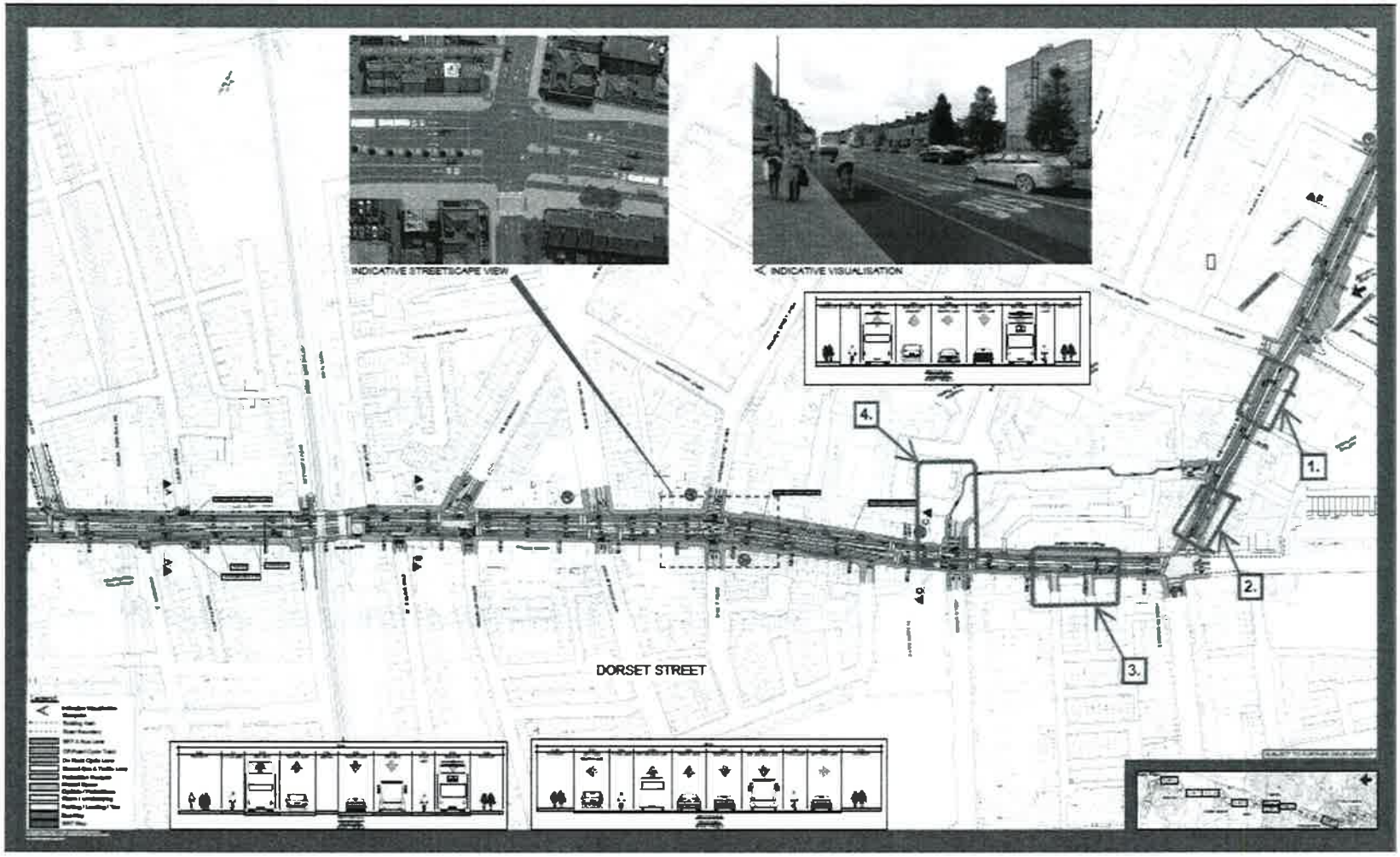
It is important for the city at this early stage of the scheme design, that we ensure the optimum transport solution can be achieved, and that the preferred route proposed is best for Dublin's city commuters and businesses. It is clear that there are many flaws in the Route Options Assessment Report presented by the NTA. There is no clear rationale for supporting the O'Connell Street / Westmoreland Street Option as the preferred route, and indeed this proposal presents serious problems for the city's primary Civic spine, and the businesses and retailers located in the area. It is clear that the Gardiner Street option presents a better alternative for the city.

Dublin Town will continue to work on behalf of its members to proactively respond to the proposed Dublin BRT so that short-term challenges can yield long-term benefits for the city centre. The proposed Dublin BRT can have significant benefits for residents, the city as a whole and the city centre businesses. These benefits can only be realised if the BRT is implemented correctly, free from issues and essentially utilising ideas from international best practice BRT examples.

Appendix A

Swiftway
Bus Rapid Transit

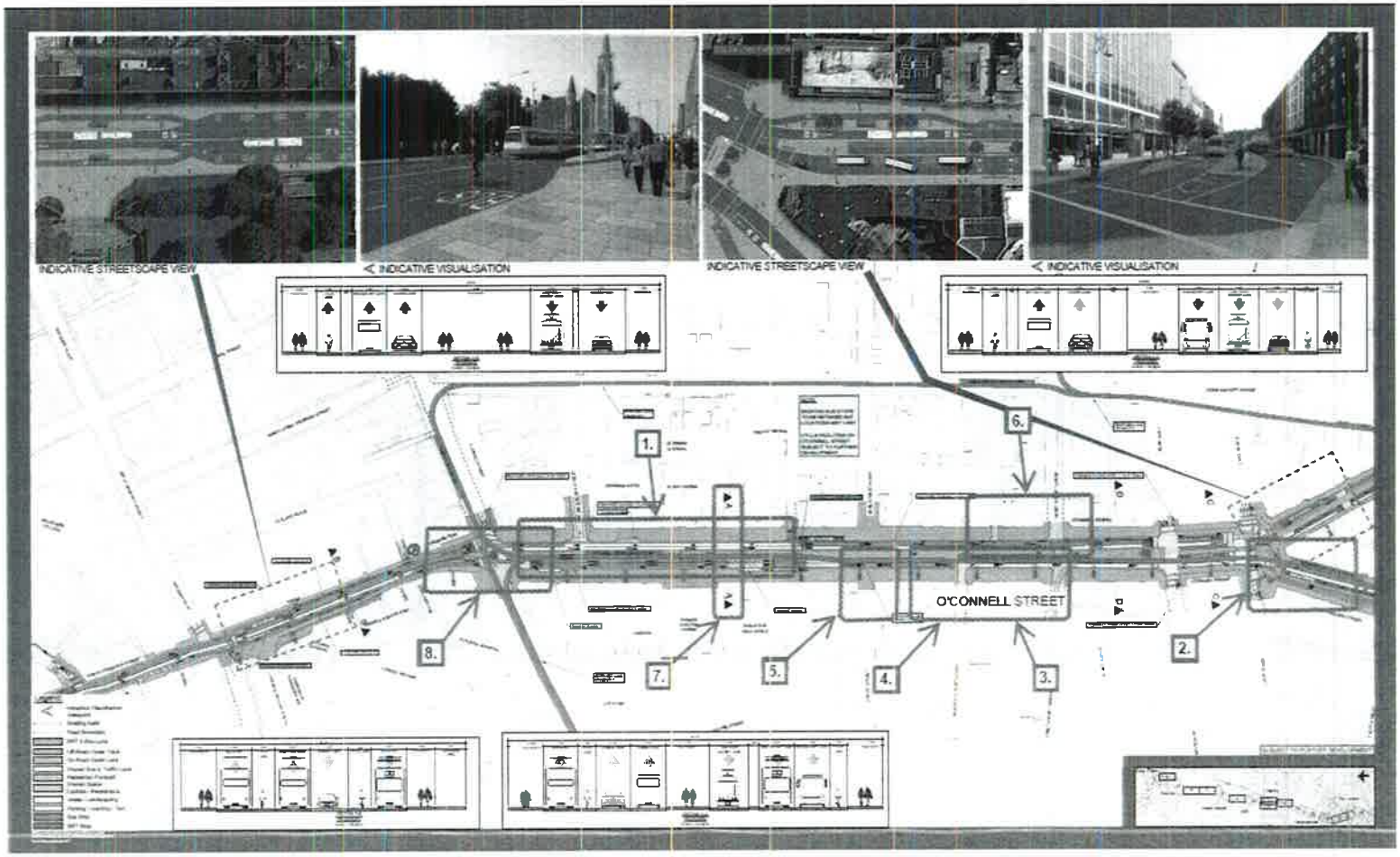
Swords/Airport to City Centre



MAP 17

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre



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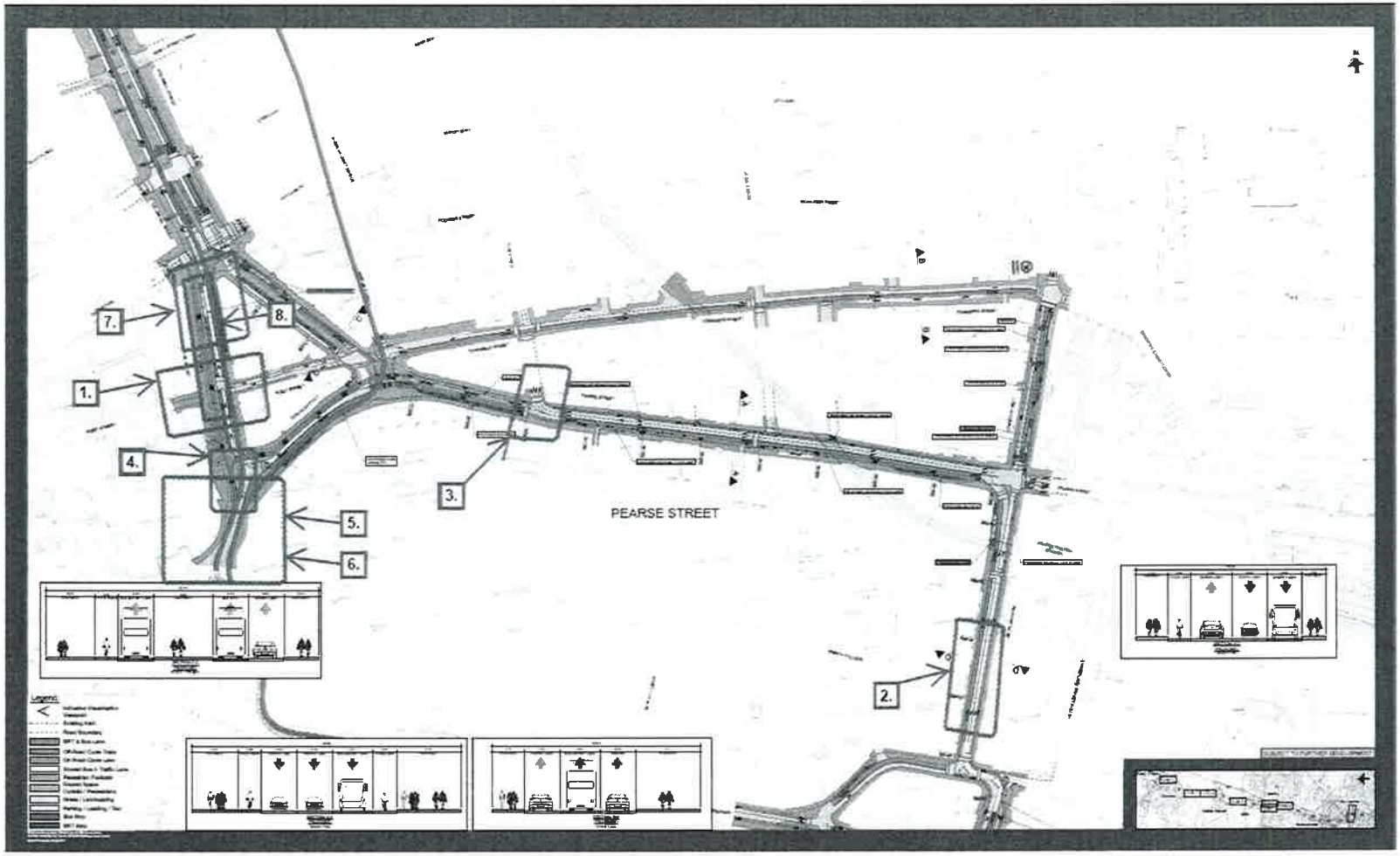
MAP 18

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre



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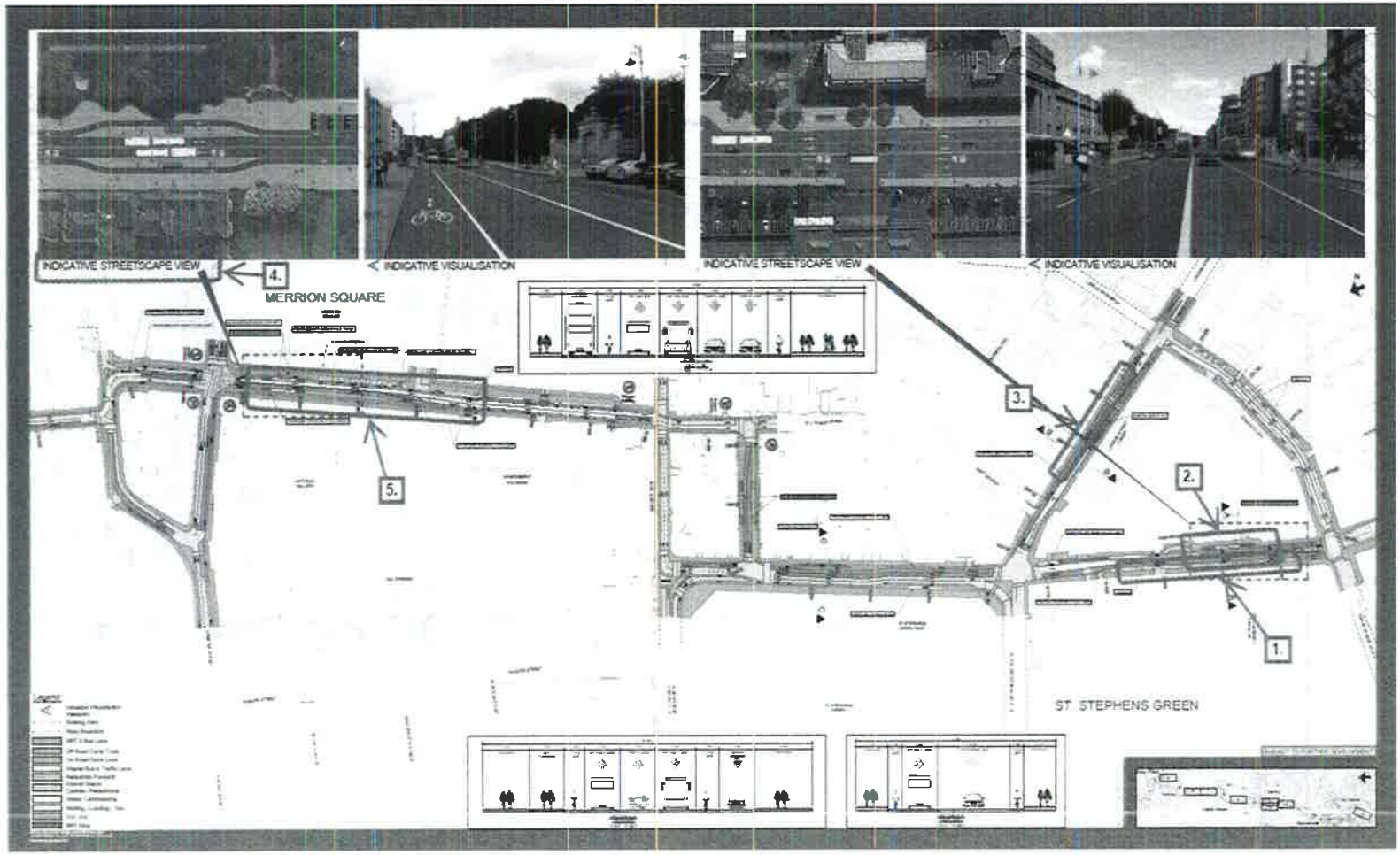
MAP 19

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre



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Appendix B – Photographs of key streets considered for BRT Route Options

O'Connell Street – Northbound – competing for space

O'Connell Street – Southbound – parked buses (in cycle lane) reduce capacity

College Street – Buses vying for space

Amiens Street – Wide road with capacity for BRT less side road activities

[redacted]

Connolly – DART – Commuter – Luas – Bus interchange

Gardiner Street – Wide street with few commercial interruptions /activities / conflicts

Gardiner Street looking north

View of Lombard Street from the Quays

[redacted]

[redacted]

Hi David,

Please find attached Dublin Chamber's BRT submission and many thanks for accommodating us with the extension on this.

I'm sending it via email as the consultation portal on the NTA website has been closed – I'd be very grateful if you could ensure our submission reaches the person responsible for the BRT consultation.

Thanks again,
Orlaith

[redacted]

Hi Orlaith

No problem, that is fine by me.

[redacted]

From: Orlaith Delargy [mailto:Orlaith@dublinchamber.ie]
Sent: 28 November 2014 17:01
To: David King
Subject: BRT submission

Hi David,

Hope all's well with you. I've been working on Dublin Chamber's submission to the BRT consultation since we met at the Engineers Ireland event.

I know the deadline is today but have just received some last minute input from one of our members which I'd like to include - would it be ok if I sent you our submission paper on Monday morning?

Kind regards,

Orlaith Delargy
Public Affairs Executive | LinkedIn | 01 644 7248
Dublin Chamber of Commerce, 7 Clare St, Dublin 2

[redacted]

[redacted]

dublinchamber
of commerce

Submission to the National Transport Authority

Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre

[redacted]

Introduction
Dublin Chamber welcomes the opportunity to input into the National Transport Authority's consultation on the proposed Bus Rapid Transit (BRT) route from Swords to the City Centre.

With over 1,300 member companies, Dublin Chamber is the largest chamber of commerce in Ireland and the most representative and broadly-based business group in the Greater Dublin Area. The Chamber's policy work focuses on developing the Dublin region's infrastructure and transport, promoting competitiveness and improving local governance.

In developing plans for this route, it is essential that the Authority adheres to certain key principles, outlined below.

Integration
It is vitally important that BRT plans are developed in line with a wider strategy for Dublin transport.

Dublin Chamber therefore welcomes the NTA's commitment to enhancing the benefits to pedestrians and cyclists along the proposed route via segregated cycle tracks, improved cycle lanes, cycle parking at Swiftway stops and improved pedestrian routes. At present, BRT plans also account for certain interchange points with existing Luas and DART infrastructure.

However, route plans should also anticipate ways in which future investment projects may interact with the BRT service.

Fingal County Council is developing a plan for a sustainable transportation network to cater for the expansion of Swords from its existing population of 40,000 to an eventual population of 100,000. The plan includes a proposal for a Swords Western Ring Road to relieve traffic volumes on the congested section of the M1.

The NTA has pointed to a public transport deficit along the proposed Swords route, stating that "if development occurs along this corridor as currently planned, further significant investment in rail-based transportation infrastructure along the corridor will be required, which may include Metro North."

The RPA have also proposed plans for heavy rail in Swords and Lucan, while Iarnród Éireann have plans for a heavy rail link to the airport in the form of a spur from the DART line.

BRT's attractiveness as a low-cost solution is weakened if other projects overlap and serve the same or similar catchment areas. All projects must be placed within a strategic transport network to ensure demand is adequately met and avoid duplication of services.

Similarly, the impact of ongoing projects must be taken into consideration. For example, the M50 demand management scheme begun in 2013 is expected to affect traffic on a number of regional roads connecting Swords with the N2/Ballymun/Finglas area.

The NTA should explain its vision for how BRT can interact with future transport projects to absorb demand along the proposed route.

Projected demand
Of the three proposed BRT routes, it is estimated that the Swords to City Centre line will experience greatest demand. According to the 2011 Census, Swords is the largest town in Dublin county and has seen strong population growth in recent years.

However, the Authority should carry out an in-depth demand assessment to ensure that the BRT service is adaptable for maximum and minimum demand scenarios.

Implementing BRT asks existing Swords commuters to switch modes from their current preferred transport option e.g. Dublin Bus, car, private bus operator etc. If this switch is not sufficiently incentivised, demand will not reach expected levels and the BRT service could be in danger of being undersubscribed. Conversely, Amsterdam's experience implementing BRT saw usage in the first year up to 99% higher than had been estimated.

The NTA must find a middle ground between these two demand scenarios, taking careful consideration of the transport services already in operation in the Swords area, and the reasons why commuters choose these.

Speed of implementation
The NTA has acknowledged the need to provide Dublin with a wider set of transport options. Furthermore, it is necessary to move quickly in order to address worsening congestion in the city centre.

Figures from Dublin City Council and the NTA suggest that between 2012 and 2013, there was an increase of 6.9% in the number of public transport users crossing the canal cordon between 7:00 and 10:00. The number of users is up from 86,047 in 2012 to 91,981 users in 2013.

All three modes of public transport – bus, rail and Luas – have shown increases in recent years. Crucially, bus had the largest number of additional passengers with 4,170 additional users between 2012 and 2013. Bus also has the largest modal share of public transport, carrying over 56,000 passengers into the city in 2013 and representing 61% of all public transport trips in the morning peak.

BRT systems are one of the fastest transport solutions to build and operate, and could therefore be a speedy way to tackle this upward trend of public transport users travelling into the city centre.

Proposed Route
The route proposes to take the Swords Bypass and continue on to Airside. This means that the BRT service would be positioned some distance away from densely-populated estates such as River Valley and Rathbeale. If BRT aims to attract commuters who currently choose commercial or Dublin bus services, the service must be within

reasonable walking distance for commuters.

The NTA should carefully consider the case for servicing Dublin Airport, and the times at which this would be most beneficial to the maximum number of commuters.

Dublin Airport's peak hours differ from those of the City Centre. The peak hour in terms of aircraft movements is generally 6/6.30-7.30am. Passengers begin arriving for these flights up to 90 minutes beforehand, that is, from 4.30am onwards for a 6am flight.

Dublin Airport Authority's 2013 survey of staff transport choice suggests that a third of all staff can start their early shift before 6am. Those living in Swords, Santry, Whitehall, Blanchardstown, Clonsilla etc. have no public transport options that will get them into the Airport before this early shift commences. Some 47% stated that there were poor or no public transport options open to them.

For those commuting to the City Centre at peak morning hours, an airport stop would add approximately 10 to 15 minutes to their journey time.

The NTA has suggested that there may be "a separate Swiftway service starting and terminating at Dublin Airport and running to the City Centre." Dublin Chamber considers it prudent to distinguish between direct routes to the city centre and those servicing the airport. The two routes would cater to differing demand periods. For example, early morning and daytime buses (e.g. 5.00-7.00am and 9.30am-4 .30pm) could serve the airport, while other buses could bypass it, catering to 'normal' rush hour times (e.g. 7.30–9.30am and 4.30-6.30pm).

Current route plans would see the BRT service passing through Santry and Drumcondra, which are commonly perceived as bottleneck or pinch areas at peak hours. By contrast, commercial bus operators from Swords use the Port Tunnel to reach the City Centre, thereby bypassing congestion in Santry and Drumcondra. If the public perception is of a 'bypass vs. bottleneck' situation, potential BRT users will need to be convinced that dedicated lanes and improved prioritisation will minimise delays in problem areas.

Comhairle Contae Fhine Gall
Fingal County Council

An Roinn um Pleanáil agus Infrastruchtúr Straitéiseach
Planning and Strategic Infrastructure Department

Mr. Hugh Creegan,
National Transport Authority,
Dun Sceine,
Harcourt Lane
Dublin 2.

Re: Swiftway BRT, Swords to City Centre

Dear Mr. Creegan

I refer to the consultation process in relation to the above and also to our previous submission to NTA dated the 18 March following the first non-statutory consultation, the comments in which are still relevant.

The Planning Authority (PA) has been engaged in a consultation process with the NTA on the details of the draft Scheme and I look forward to continued engagement to resolve any outstanding issues or new issues that may emerge from the current consultation process.

The PA supports the development of BRT between Swords and Dublin City and welcomes in principle the proposed BRT Scheme. The decision to extend the service to the North West area of Swords is also welcome

The PA understands, and this is also the position of the NTA, that while BRT may provide an interim partial transport solution in the shorter term, a higher capacity rail solution, such as a metro, will ultimately be required on this corridor connecting Swords and Dublin Airport to Dublin City Centre.

The PA remains strongly committed to the development of rail based transport solutions between Dublin City and Swords (incl. serving the Airport). While BRT may provide an interim partial transport solution in the shorter term, a higher capacity rail solution, such as a metro, will ultimately be required on this corridor. The PA would also wish the NTA to note that a similar viewpoint has been strongly and consistently articulated by our Elected Members in numerous discussions in relation to BRT. The PA has been assured that the development of

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Recycled Paper

the BRT will not prejudice the development of a future higher capacity rail system on this route in the future.

The PA notes that the NTA has commissioned the Fingal/North Dublin Transport Study. The overall objective of the study is to identify the optimum medium term / long term public transport solution connecting DCC to key destinations in the scheme corridor, including, in particular, Dublin Airport and Swords. The PA as a key stakeholder is engaging with the NTA and their appointed consultants as part of this study which is due to be completed early in 2015 and looks forward to an acceptable solution emerging which will serve the medium to long terms needs of Swords in particular.

The PA looks forward to contuinuing engagement with the NTA on finalising the Scheme.

Regards

Gilbert Power
Director of Planning & Strategic Infrastructure

[redacted]

Public Consultation on Swiftway Bus Rapid Transit Preferred Route Swords-Dublin City Centre

To whom it may concern,

Please find attached a note concerning your recent consultations on the preferred route for the proposed Bus Rapid Transit corridor connecting Swords and Dublin City Centre.

At the outset, I would like to highlight that I feel the development of a high speed connection between Swords, the airport, Drumcondra and the city centre is a long overdue development and as such this is something that I welcome. However, with that, there are both overall concerns and some route specific concerns which I would have, as outlined in bullet points here.

1. **Impact on existing bus services**: I remain unsatisfied as to the potential impact on existing bus services that is envisaged upon the introduction of BRT. There is legitimate concern among citizens along a number of existing routes, which has not been quelled by the vague answers we have received during the route consultations.
2. **Proposed stops for Santry:** these are quite far from a number of population centres, and will prove a walk for citizens living near in both Whitehall and Santry. It would seem to me that splitting this into two stops would be desirable. Given, in your own consultations, you state that each stop takes approximately 20-30 seconds, I can't see this being an issue.
3. **Dorset Street traffic congestion**: when I asked about this at consultation stage, I was assured that BRT would not delay Dublin Bus services when stopping along the route. However, my concern is the inverse, especially around Dorset Street where there are multiple bus stops and limited road space - how will BRT cope with being stuck behind Dublin Bus where no alternate traffic lanes are available? This seems like a serious potential bottleneck.
4. **Pedestrianisation of TCD and changes to D'Olier/Westmoreland Street schemes:** I note the announcement of a trial pedestrianisation of one half of the plaza on college green, with traffic being reduced to one lane in each direction. Has this been factored into your plans? Will it materially impact the proposal if these changes become permanent? These questions, and the answers, appear to be still outstanding.
5. **Prospect of route variance through Ballymun corridor:** Ballymun and Glasnevin North would benefit greatly by varying the route through this corridor. I note that this is being considered in Swords. Why not for this segment of the route? This was, after all, identified as the preferred Metro North route.

All told, I welcome any improvement to public transport on the Northside of Dublin. However, I believe the above four concerns which I have highlighted may pose some difficulties, and I am aware of other concerns being highlighted by stakeholders which may pose similar difficulties.

I look forward to your response.

Kind regards,

Cllr. Noel Rock

[redacted]

[redacted]

[redacted]

This proposal is completely without merit as it is clearly based on policy-driven evidence making.

NTA is not using public funds to good effect by continuing to spend public resources on developing a BRT service for a route that it has already found to have a public transport demand that exceeds the forecast passenger numbers

I attach my submission

[redacted]

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[redacted]

National Transport Authority
Dun Scéine
Harcourt Lane
Dublin 2

Re. **Swiftway Bus Rapid Transit – Swords/Airport to City Centre**

A Chara,

I wish to object to this complete project on the grounds that the proposed Swiftway Bus Rapid Transit (BRT) project will not serve the public transport needs identified in your own reports.

As presented, it is clearly the result of policy-driven evidence making by the National Transport Authority, given that in your 2012 BRT Core Dublin Network report of 2012 concluded that

*"The Swords to Tallaght corridor has a **forecast demand that greatly exceeds** the capacity of BRT in the current 2030 current infrastructure scenario and **also exceed the 3,600 ppdph in the 2030 scenario**.....It is on the northern section of this corridor - **between Swords and the City Centre - that the high levels of demand arise**....Overall, the link between the city centre and Swords has **demand levels that exceed the capacity of a moderate capacity BRT system**, in the longer term. While BRT may provide an interim partial transport solution in the shorter term, **a higher capacity rail solution**, such as a metro, **will ultimately be required on this corridor.** In the light of this, **the Swords to City Centre BRT section has not been brought forward to the later costing and appraisal sections of this feasibility study report**"*

The National Transport Authority (NTA) Board accepted this analysis as reported in the minutes of the September 2012 Board meeting minutes.

21 September 2012

Mr Creegan outlined the main features of the Authority's proposals for the development of a BRT network in the Greater Dublin Area. The strategic proposals will be published in a report in due course.

*The Authority will now start work with a view to securing statutory approval in 2013 for **two cross-city BRT corridors which have been identified as feasible.** The implementation of those corridors will be subject to the availability of the necessary funding in the future.*

http://www.nationaltransport.ie/wp-content/uploads/2012/04/Minutes-of-Board-Meeting-21st-September-1.pdf

The National Transport Authority has not produced any evidence to support any change to this 2012 policy.

In the recently completed Swiftway/Airport to City Centre Route Options Assessment Volume 1 : Main Report (October 2014), it is clearly stated that

Swiftway will operate a high frequency service and is initially planned to operate at a frequency ***of 4 minutes during peak commuter periods*** *along the busiest section, reducing to match demand off peak* (p. 14)

This 4 minute frequency results in capacity of 1,800 ppdph south of the Airport (par. 10.2.4 p. 160 of the October 2014 Report), based on a maximum bus capacity of 120 passengers. The October 2014 report then goes on to assume two separate routes, one operating at 4 minute frequencies and the other at 8 minute frequencies.

In summary, this assumes a 2.66 minute frequency on the Dublin Airport- Drumcondra City Centre corridor.

This is the basis for a Detailed Transport Demand Analysis – Stage 2 (p. 174 – p. 189) which show, with one exception (Figs.10.6 and 10.7) , that passenger numbers exceed the 1,800 ppdph.

The report shows clearly that passenger demand exceeds the BRT capacity assumed for this technology.

"The profile shows that loadings peak in Drumcondra in both directions with loadings of 2,300 southbound and 2,500 northbound which are both below the initial assumed combined service capacity of 2,700 passenger per hours (22.4vph)"

Given that a number of these Options assume that the existing Dublin bus network is in place, what is the point of investing so much for something that will not provide the public transport capacity needed to meet the demand forecast

This is summarised very neatly in Tables 10.5 and 10.6 (p. 187) which summarise the result for the opening year 2018 and the forecast year 2033 for Route Options 2 and 4.
In both cases, the Maximum Load (Combined Lines) shows clearly that the capacity of

1. 1,800 ppdph is exceeded by over
    - 40% in 2018 - the opening year for BRT;
    - 80% in 2033 – the forecast year.
2. 2,700 ppdph is exceeded by
    - 22% in 2033 – the forecast year

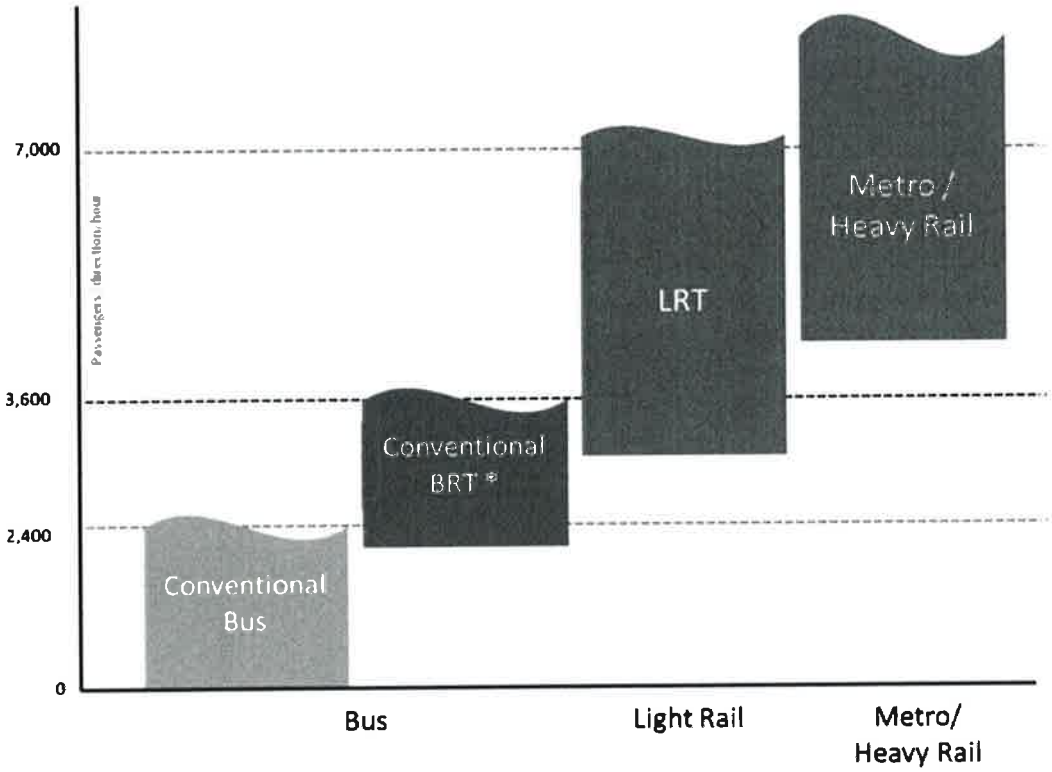
    while being
    - At 95% capacity in 2018.

These Tables indicate clearly that the National Transport Authority is making evidence to suit some pre-judged outcome, based on the same footnote attached to each table

1. *Demand is annualised based on AM peak period fctor of 1,268 derived from 2006 Household Survey Data*
2. *PT travel time includes access, waiting time etc*

It is anticipated that ***demand will increase*** *following a reorganisation of Dublin Bus routes. Results presented are for full GDA model area, not only Swords corridor.*

This shows clearly that the demand for public transport in North Dublin needs at least 2 LUAS lines looped around the North City with a link to the Howth Junction DART station. This is illustrated by these figures taken from the 2012 NTA BRT Core Network Report



* Higher Capacity BRT can be provided under specific conditions:
- dedicated bus lanes
- dual/overtaking BRT lanes
- longer vehicles
→ Not appropriate for Dublin

Note that the footnote points out that Higher Capacity BRT is not appropriate for Dublin. Yet, this is the basis for the current proposal for the Swords-Dublin Airport- Drumcondra-City Centre Swiftway.

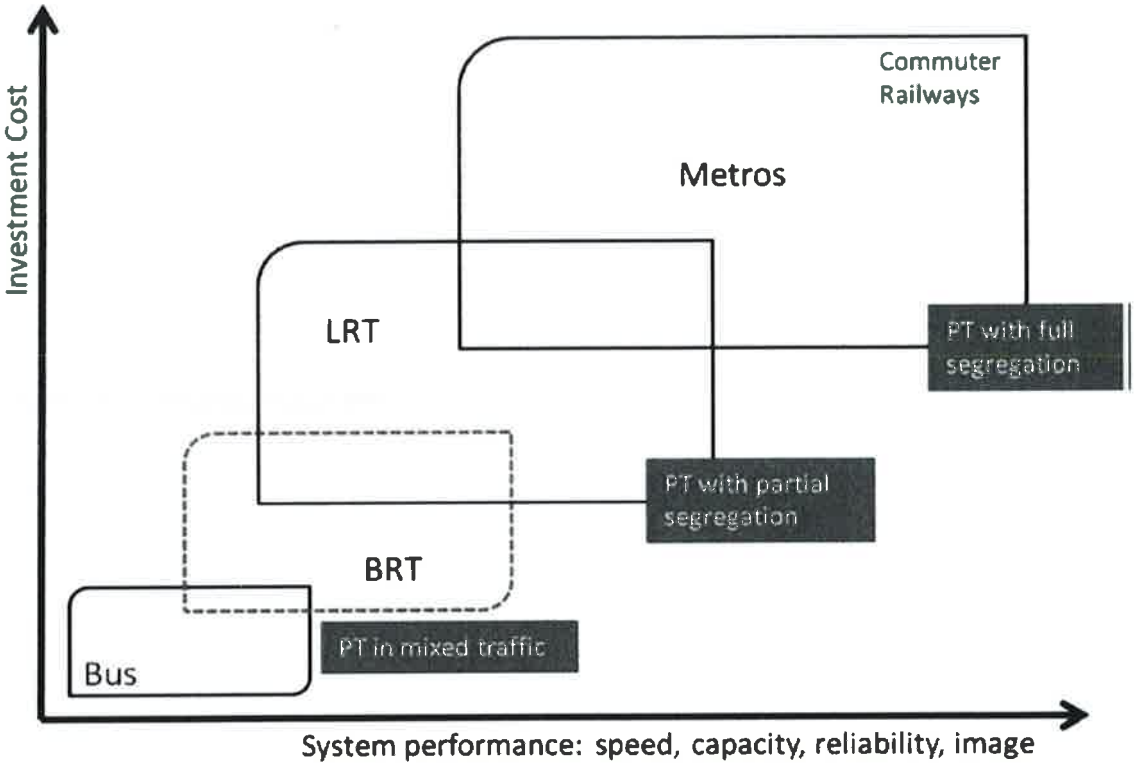
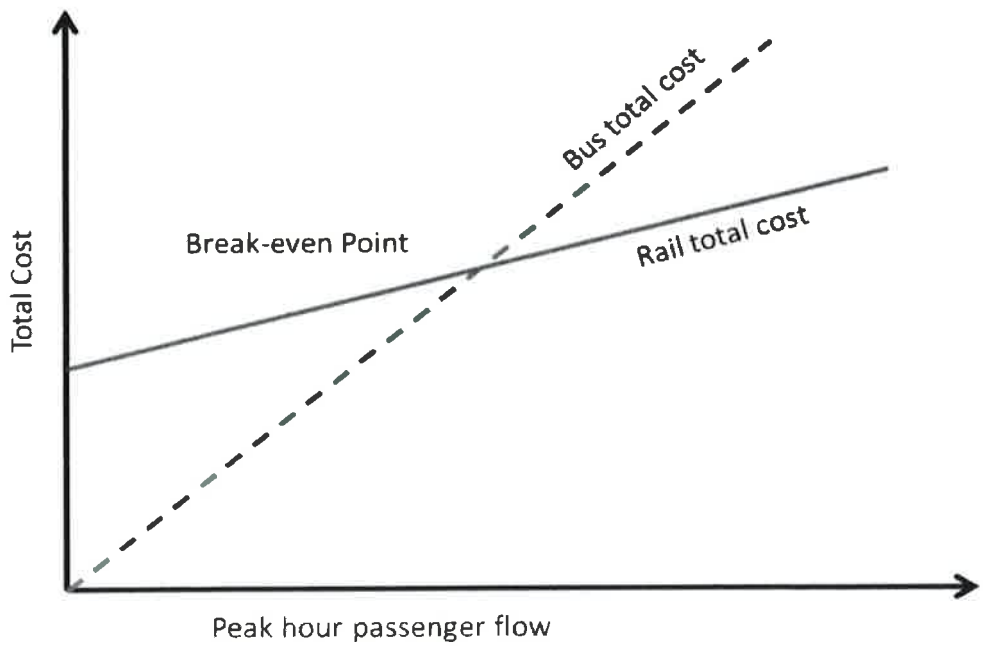


Figure 21 illustrates that if demand justifies it, higher investment costs will be offset by lower operating costs over the full life cycle.



If the NTA is serious about providing a fit-for-purpose public transport system in North Dublin, it must immediately stoop wasting public resources on this ill-thought through BRT and get on with providing LUAS to the North City

[redacted]

[redacted]

National Transport Authority

Dún Scéine

Harcourt Lane

Dublin 2

[redacted]

Dear sir or madam,

Re.: Submission to NTA Swiftway Bus Rapid Transit – Swords/Airport to City Centre Public Consultation

The proposal to deliver a form of Bus Rapid Transit, or High-Level-of-Service bus, for Dublin is very positive. Dublin is a low-density, mid-sized city with a mostly affluent population and an advanced, competitive economy. In spite of that, mobility levels are very low. In the 2011 Census, for the core built-up area (i.e. the "city and suburbs"), only 21% of morning peak hour trips were made by public transport. For the full day and week-time period, the picture is likely to be far worse. A core Transport Network, primarily based on such *High Level of Service* bus corridors, is therefore an appropriate, necessary and sustainable response to the city's low and worsening levels of public mobility.

The opportunity for consultation is welcomed and I would like to make the following comments on the Swiftway Bus Rapid Transit – Swords/Airport to City Centre proposals: -

SHARING OF CYCLE FACILITIES

I would state at the outset, that walking and cycling are also important for the future of mobility within the city. Therefore, it is highly positive that this proposal takes due regard of the *NTA Cycle Strategy for the Greater Dublin Area*. Public transport planners (and indeed all modal planners generally) habitually take a biased view of the need for exclusivity and protection from other modes. Designing for integration between modes is a necessary and commendable step and, even if there is some opposition to the concept, the NTA should still not be dissuaded from this approach. Consideration could even be given to trialling some of the more innovative measures (e.g. cycling-behind-bus-shelters), which mostly work well in other cities but may be new to Dublin.

A CORE DUBLIN TRANSPORT NETWORK

The Swiftway proposal has to be part of a future ***Core Dublin Transport Network***. Regrettably, the entire proposal is fatally undermined by the absence of a relevant, agreed Transport Strategy for the Greater Dublin Area.

Ideally this would present in clear strategic terms the delivery of (a) an effective Core Dublin Transport Network serving all parts of economy and society and (b) quality, sustainable mobility services to all citizens at all times.

CORE DUBLIN TRANSPORT NETWORK

An effective Core Dublin Transport Network implies the eventual introduction of ***High Quality Orbital Services***. This is absolutely essential. Even the outdated *draft* Transport Strategy for the Greater Dublin Area forecasts that in 2030 46% of all peak hour trips will be orbital and suburban in nature. This does not include "directional trips", i.e. trips that may require a transfer.

Recent studies by DIT* (published in ITRN 2014), indicate that between 1 in 3 and 1 in 7 of existing QBC users are transferring from or to another public transport service. This appears very significant in an urban transport market traditionally associated with low or negligible levels of transferability.

At minimum, therefore, any "Swiftway" corridor should be designed to incorporate ***highly effective interchange points*** to accommodate transfers, at zero or minimal penalty, onto the orbital network. (The concept of "Leap Points" is being proposed by DCC Beta** and could be worth investigating and developing in this regard).

HIGH LEVEL OF SERVICE APPROACH

BRT (Bus Rapid Transit) is emerging as a preferred solution in many urban transport markets and it is good that the Authority is considering such a "best-practice" approach. However, compared to many comparative, low-density and dispersed cities, Dublin already has a relatively evolved *Quality Bus Corridor* network. In terms of value-for-money, expedience and optimising transit capacity it may yet be optimal to consider the incremental improvement of Dublin's existing QBC network to a *high level of service*.

The Bus with High Level of Service (BHLS) approach is service-oriented and systems-based. The approach is now becoming generally recognised and the Authority could, for example, consider a ***Level of Service Guarantee*** on designated corridors. This would ideally be people-centred and based on simple, measurable, user-focussed indicators (e.g. mean journey-time, level of connectivity, percentage on-time arrivals, etc.).

Irrespective, all buses operating on a Swiftway corridor should be subject to strict Service Level Agreements and very high Levels-of-Service should apply. In my opinion, there should be no 2-tier services on Swiftway routes (unless they are exclusively local services).

The level of city centre bus priority afforded to Swiftway may be its most essential ingredient. The core QBC network is very successful, carrying over 70% of all trips. However, its performance is seriously affected as buses enter the city centre. Resolving city centre reliability may be the most crucial aspect to delivering an overall mobility network.

TRANSIT-ORIENTED-DEVELOPMENT

The above referenced DIT studies* also demonstrate a clear link between Levels-of-Service and walkability. QBC bus stops in Dublin, where Levels of Service are high enough, have catchment areas

as great, if not greater than rail. While studies are ongoing in this area, it is clear that people are prepared to walk at least 1000m, possibly up to 1500m, to a quality bus service.

This suggests two things: -

> Firstly, as already iterated above, there is no necessity for 2-tier services on quality corridors (except for local services) as stopping patterns improve through better services.
>
> Secondly, there is a strong evidence to support integrated neighbourhood design around transit hubs. This is often termed "***Transit-Oriented-Development***" (TOD, or "Smart-growth", etc.). But in principle, mixes of uses are concentrated around well-designed transit hubs which support high levels of service.

A recommendation in this regard is for Swiftway to commission a similar study as was prepared by Brady Shipman Martin, a landscape and urban design consultancy, for rail hubs around the Greater Dublin Area.

The Authority should, in any respect, consider the preparation of a land use and transportation plan (which would be the norm for the planning of, for example, any new urban rail corridors) as part of the development of Swiftway.

Serving Santry and Swords

A core principle of TOD is that public transport should penetrate the heart of communities and, in this regard, greater effort should be made to serve Swords and Santry town and village centres directly. With good traffic management and space-sharing this should be achievable without expensive land take. It should also be a strong catalyst for regeneration, business development and environmental improvement. There are many successful international examples of this.

At minimum, a future design option should be considered for both places, which could even be retroactively applied once the concept of Swiftway becomes more accepted.

The type of integrated design required to achieve this is precisely that which is required by the *Design Manual for Urban Roads and Streets* (DMURS). DMURS requires a multi-disciplinary approach to environmental design and this will be absolutely essential for Swiftway, particularly as it passes through urban and village centres.

All public realm investments should be subjected to a DMURS multi-disciplinary approach (including, for example, the provision of planning & land use strategies / landscape designs / urban design analysis, etc.).

CAPACITY

Capacity analysis is an imprecise science and is contingent on many factors, such as service planning and operating standards. However, the capacity of the Swiftway corridor appears to be ***greatly under-stated***. In the first instance it is clear that existing Dublin Bus and other private services will also use the corridor. The extent of such services should be openly stated and included in the capacity estimate.

Further still, there is plenty of evidence of much higher capacities on bus corridors in Dublin which have much poorer operating environments than what is proposed within Swiftway.

For example, a paper*** by Mr. Dermot Kinane and Ms. Maggie O'Donnell of the Dublin City Council ICT Office (published in www.itrn.ie 2013), based on Dublin City Council SCATS data, confirms that "at Trinity College there are almost 400 buses in both directions during the peak hour (08:00-09:00)", and that "O'Connell Bridge has around the same, except with competing movements".

Available evidence suggests that current operational capacities of between 4,000 – 16,000 passengers per direction per hour are well being achieved within the Dublin QBC network. Such capacities are counteracted by erratic service levels and that is where a BHLS concept such as Swiftway comes in.

Other Service Issues

There is reference to an "optimised Dublin Bus Network" project, with "some operational savings" based on a Dublin Bus reorganisation. While this may be very positive, the Authority must make explicit the real service impact of Swiftway, including the potential withdrawal or rearrangement of existing services.

It appears that the successful Airport direct services would be replaced by the Swiftway concept. This seems unusual given their popularity and given that Swiftway would offer a lower level of service than the highly-demanded airport-city express route.

The same can be said for other private services. In total 25% of all buses entering the city-centre during the AM Peak (according to the 2013 Canal Cordon Count) are private services. It will be crucial to both regulate and accommodate these services within the new Swiftway environment. Greater dialogue with stakeholders may be helpful in this regard.

Similarly, it is not clear as to the level of access for taxis, and the recent 44-point action plan and dialogue process should be had regard to.

VEHICLE TYPE

Dubliners already accept double-deck vehicles, an unparalleled advantage in running efficient, high capacity, on-street services. In my opinion there is no compelling case for the introduction of articulated or "bendi-" buses.

Bendi-buses have disadvantages: they cannot, for example, divert / branch / feed other parts of the network because of inadequate stop layouts. A more open approach to this issue during this preliminary, non-statutory consultation might have been undertaken.

If an absolute commitment to bendi-buses is made, as appears to be the case, the Authority should strongly consider branding shared services on the corridor with a similar Swiftway livery. All shared services operating on Swiftway corridors should also be part of the off-board ticketing regime. Over time, with off-board ticketing and multi-door access, there may be no material service-level distinction between the articulated and double-decker services.

Most importantly of all, the Authority should commit to exceptionally high Service Level Agreements for ALL services operating on the Swiftway corridor.

Emissions

Equally importantly, the Authority should make a basic commitment, irrespective of fuel-propulsion-technology, to ***only permitting Euro 6 emissions-standard*** vehicles on the Swiftway corridor.

This commitment, alone, would act as a key branding distinction and would help to attract a favourable public attitude towards the overall concept.

CONCLUSION

While there is inevitably much debate and speculation on technical aspects of Swiftway at this point, such as vehicle type, corridor alignment, median-versus-kerbside running way options, etc., the central discussion at this point should be around Levels of Service.

Ultimately, it is hoped that Swiftway can be both a scalable and transferable concept and, above all, ***highly end-user-focussed and service-oriented***. This way it can become a real stepping stone towards a resilient, sustainable and fully-mobile city.

Yours sincerely,

David O'Connor

MSc Spatial Planning Programme Chair and Lecturer in Transport Planning

DIT Environment & Planning

Dublin Institute of Technology

Bolton Street

Dublin 1

REFERENCES

* O'Connor, D., Stillorgan QBC Level of Service Analysis, www.itrn.ie, 2014 and O'Connor, D., Malahide QBC Level of Service Analysis, www.itrn.ie, 2014

** DCC Beta: http://dubcitybeta.wordpress.com/2014/11/07/leap-points/

*** Kinane, D. and O'Donnell, M., Dublin Public Transport Interface Module – a Pilot Study, www.itrn.ie 2013

[redacted]

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Submission by

Arnotts Limited

to the

National Transport Authority

in relation to

THE PROPOSAL TO PROVIDE A SWIFTWAY SERVICE

[redacted]

[redacted]

Introduction

Arnotts Limited is a major Department Store in Dublin city centre with shop frontages onto Henry Street, Liffey Street and Middle Abbey Street. The Arnotts building also consists of a 350 space multi-storey car park with access from O'Connell Street via Princes Lane. Arnotts Limited also owns the Boyers Department Store on North Earl Street which has an additional frontage onto Marlborough Street.

Arnotts employs in excess of 1,200 people and is a major contributor to the exchequer and to city council rates. Arnotts Department store is one of the primary draws to the Henry Street shopping district for shoppers from Dublin and from throughout the country.

Background to Submission

The NTA published plans in early 2014 to introduce a Swiftway service for the route from Swords to St Stephen's Green. On 14 October, 2014 the NTA published its route proposals.

Arnotts Limited has examined these proposals. While generally being supportive of public transport initiatives in Dublin City, we have concerns the Swiftway BRT scheme, as it is proposed, has the potential to seriously damage Arnotts department store business as well as other retail and commercial businesses in the city centre.

We are concerned that private car traffic is being discouraged from entering the city and this will significantly impact on Dublin city centre to the advantage of out of town shopping centres like Dundrum, The Square Tallaght, Liffey Valley, Blanchardstown and Pavilions Swords where private car usage is encouraged and facilitated.

Access to the Arnotts car park and other car parks in the city centre is being made more difficult as greater traffic restrictions are being imposed. The car borne shopper is extremely important to Arnotts.

Specifically, Arnotts finds the following difficulties with the proposals:

We are concerned that there has been insufficient analysis done on the impact of the proposed Swiftway BRT on the economy of the city centre

We are concerned that there has been insufficient analysis produced and no economic impact report to help us assess the merits of the proposed Swiftway BRT. Without such analysis it is not possible to support the proposed scheme.

The complete traffic plan for the city has not yet been published

Arnotts understand that Swiftway BRT is part of an overall plan for the city. Luas Cross City, Swiftway BRT, dedicated cycle lanes, a likely extension of the Busgate operation at College Green and other initiatives will feature in a future vision for Dublin City.

Without the benefit of a comprehensive traffic plan it is difficult to fully assess the impact on the city of the proposed Swiftway BRT and the impact on our business interests.

Indeed your own Bus Rapid Transit Core Network Report of 2012 seems to have completely rejected the idea that BRT system would be suitable and have adequate capacity to cope with demand. We would ask what has changed between the publication of this report and now?

SWIFTWAY BRT PREPARATORY WORKS TO OVERLAP WITH LUAS CROSS CITY WORKS

We are currently concerned by the impact of on-going LUAS Cross City works and the negative impact it is having on access to the city and on our business interests. Car park activity is down and retail business is down. We are concerned this will be compounded if Swiftway BRT preparatory works proceed in 2016 and overlap with LUAS Cross City works.

We would prefer to see LUAS Cross City completed and active in order to properly assess its impact before introducing a new public transport initiative which will compete for cross city business.

WE ARE NOT CONVINCED THAT SWIFTWAY BRT NEEDS TO CROSS THE CITY CENTRE

Our primary concerns with the proposed Swiftway BRT relate to the section of the route that cross the city centre.

As currently presented it appears that the proposal seeks to push more vehicles into an already congested area using the existing infrastructure.

We see more rationale behind a commuter service terminating at the edge of the city centre. The Luas Cross city service can easily facilitate commuters wishing to travel further to the Dublin 2 area where the proposed Swiftway BRT is planned to terminate. We would encourage the further utilisation of the port tunnel, linked to the Luas terminal at the "three" Arena, to facilitate fast delivery of passengers into the city centre.

NTA should consider alternate orbital route options rather than increase the congestion of public transport in the city centre.

IS A BRT SERVICE THE RIGHT SOLUTION

We understand that the primary statistical information used by NTA has been commuter numbers crossing the canals between 7am and 10pm and at evening rush hour. This commuter issue we understand is driving the rationale behind the proposed Swiftway BRT scheme. We are concerned that the proposed solution to solve a weekday commuter problem will have a disproportionate impact on shoppers and business people looking to access the city between 10am and 4pm.

The proposed Swiftway route extends to beyond 20 km. The Swiftway buses only seat approx. 40% of the users while the remaining 60% will have to stand. This would not appear to provide a premium service that will attract high usage. If as expected the majority of commuters board in around the Swords area then a significant number will be expected to stand for 35-45mins on a bus. Identical situation in evening on return back from city centre

We also note that the proposed Swiftway buses are expected to have diesel engines. In our opinion this does not appear to be a forward thinking, environmentally friendly solution.

Is Swiftway BRT a safe solution

We are concerned that the proposed 18m long Swiftway buses pose a high safety risk to others users particularly cyclists and pedestrians. These buses have blind spots and a previous trial by Dublin Bus of "bendy" buses was discontinued. International experience of these buses is also mixed with London completely abandoning them in late 2011.

Conclusions

Arnotts have always, and will continue to support the opening up and on-going improvement of or transport and circulation systems. We would respectfully ask that due consideration is given to the points made above

Regards

Ray Hernan

Chief Executive

[redacted]

174 Carlton Court,
Swords,
Co. Dublin,
[redacted]

Swiftway.

OBJECTION TO PROPOSED PEDESTRIAN ACCESS TO CARLTON COURT.

Dear Sir,

1. Your draft plans as shown on your website and displayed in Applewood Community Centre on 11th November 2014 with regard to the proposed pedestrian accesses to Carlton Court refer.

2. We, the undersigned residents of Carlton Court, strongly object to this proposal for the following reasons:

- **Fly Parking**:
  - The incidence of fly-parking in the vicinity of the proposed entrance and wider area would soar, to the extent that residents would have difficulty exiting their driveways and the Carlton Court estate in general. At present the area around the green at the front of the estate is reduced to 1 car passing at a time due to this practice, as drivers park and commute to the city centre.
  - With increased fly-parking this will block fire brigade and ambulance service access. Also blocking/restricting local deliveries.
  - We also feel that unscrupulous drivers would park on the grass in the vicinity of the proposed entrance and this would create difficulties for Fingal County Council in cutting the grass and thereby affect the maintenance of the estate.

- **Anti-Social Behaviour**:
  - We feel that the opening of the wall would greatly increase the incidence of antisocial behaviour and burglaries.
  - There is currently a de facto entrance from the green area at the Pinnock Hill Roundabout.
  - In the past 12 months the South end of Carlton Court has been subjected to some cars being vandalized and attempted burglaries. As recently as Saturday the 15th November, 1 car was stolen and 2 were broken into from houses 170 to 196.
  - What prevents this area being used more is that it can get quite mucky when it rains. How simpler access will be if there is a proper entrance.
  - This entrance will also provide greater access to the Swords village area from The Wright venue in Airside. This will lead to increased noise in the area from revellers using the entrance as a thoroughfare to go to Wrights at 11.00 pm and returning at 03.00 am.
  - Increase litter in the area from revellers using 24 hr McDonalds in Airside and passing through Carlton Court.

- Pre drinking in the estate on summer evenings prior to going to Wrights.

- **Access From/To Swords Village**:
  - We fail to understand the purpose of this entrance. If it is to facilitate easier access from Swords village to the proposed stop and Pinnock Hill roundabout – it fails. It is quicker to walk from No 1 Carlton Court to the stop using the Dublin road rather than through the estate.
  - Those residents that use public transport to get to the city Centre will continue to avail of Swords Express, which provides a more direct route and has a stop right outside the estate.

3. We request that you take our objections into account when revising your plans before submission to An Bord Pleanala. Failing this, we will strongly object when the matter comes to oral hearing.

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146	Kimmy & Deirdre Gammell
148	DENIS MADDEN
150	JAMES BYRNE GERALDINE BYRNE
152	~~James & Geraldine Byrne~~
154	Brona Snow
156	Rented
158	Lucy & DOMINIC BLUNK
160	Marian Burke
162	Bernie [illegible]
164	Rented
166	Michelle De Leny
168	[illegible]
170	Brendan Costello
172	[illegible]
174	[illegible]
176	B. Cummins
178	David Bell
180	M Edel [illegible]
182	Fiona Glade
184	DNP
188	[illegible]
190	Sheila Farragher
192	Margaret Madden
1943	[illegible]
1964	Yvonne Woods

84	Eleanor Smith
86	DNP
88	Jonal Quill
90	NO ANSWER
92	Brian McGee / A McGee
94	Denis + Mary Nolan
96	Gerard + Oonagh Flaherty
98	
100	Donna Bell
102	Mark Cosgrove + Teresa Cosgrove Carlton Cnt
104	N/A
106	N/A
108	N/A
110	N/A
112	[illegible]
114	N/A
116	Catherine Kirkwood + Declan McGirk
118	
120	V. Donike
122	Karen Reynolds 122
124	Mary + Alan Dunne, 124 Carlton Court
126	[illegible]
128	DNP
130	Eugene + Denise Latin 130 Carlton Court
132	Angela King
134	Frances King
136	Gerard McNamara
138	Adrian Reid
140	DNP
142	HOSPITAL
144	Oliver Woods 144 Carlton Court, Swords

136. Deirdre Butler
134. Meral O'Reilly [redacted]

[redacted]

Clifton Scannell Emerson
Associates

LTR/11_002/8/JI

[redacted]

Mr David King
National Transport Authority
Dún Scéine
Iveagh Court
Harcourt Lane
Dublin 2

RE: Swiftway Bus Rapid Transit/Swords/Airport to City Centre Public Consultations

Dear David

We thank you for meeting myself and George McCullough with your colleague on 29th October 2014, in your office.

As outlined to you Mr McCullough is the CEO of Glasnevin Trust which runs Dardistown Cemetery. He is also the home owner of Dardistown House.

Dardistown Cemetery

1. Initially it would appear that your proposal requires taking down a wall in the ownership of the cemetery on the right-hand side of the cemetery entrance (Photo 1) (your chainage 9+050).

2. Also it appears that you require approximately a 2m strip of lands off the cemetery lands that front onto the Swords Road (Photo 2) (your chainage 9+200). These lands are to the south of Dardistown House and the main entrance to these lands. You require these lands to widen the footpath and create a cycle lane. We note that the road kerb edge appears to remain the same.

Clifton Scannell Emerson Associates Limited, Consulting Engineers, Seafort Lodge, Castledawson Avenue, Blackrock, Co. Dublin, Ireland.
T. +353 1 288 5006 F. +353 1 283 3466 E. info@csea.ie W. www.csea.ie

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Dr. Geraldine Emerson (Finance & HR) B.Sc., M.Sc., C.Chem., MRSC

Associates
Michael Holst B.Sc.Eng., Dip.Eng., MIEI, C.Eng., MIStructE
Pat Davis Dip.Eng., MIEI
Marcus Clifford B.Eng., C.Eng., MIEI, MCIHT, MCIWEM
Oliver Dalton B.Sc.Eng., Dip.Eng., C.Eng., MIEI
Hubert Feneran B.Eng., Dip.Eng., C.Eng., MIEI
Philip Lee B.E., Dip.Geo-Surv., C.Eng., MIEI, MIS, MCIHT, FIHE
Pauraic Matthews B.Eng., Dip.Fire Cert., MIEI

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Dardistown House

3. As per item 2 above a strip of land approximately 2m you required to widen the existing footpath into a footpath and cycle lane. The result of your proposed works will lead to the entrance gate piers being moved back and further loss of land. This relocation of the entrance will **substantially** decrease the sight lines for exiting traffic.

Comments

Mr. McCullough had discussions with Fingal County Council/ NRA and Dublin Bus at the outset of Part 8 Permission for the construction of the newly completed section of the Swords Road. He was informed that no further works were to be carried out on the stretch of the Swords road from the Collinstown Lane junction into town. Construction works were complete with all services installed.

At the consultation stage for the Metro and the planning stage for Terminal 2 for Dublin Airport it was stated that the mass transit system for North County Dublin was to be the Metro system which would link through the Airport to Swords. The Metro system would take commuter traffic off the roads and onto a rail system. Your proposal appears to down grade the proposed status of the Metro system which has been signed up with the local community. The Metro system would also help reduce traffic on the R132 and not increase it as will be the case.

The proposal to construct this Bus Rapid Transit system on the R132 will result in extra bus trips along the road. The bus lane will be outside the gable of Dardistown house. We note that at the house you will be leaving footpath as it is. The bus lane will therefore be approximately 1.5 meters from the boundary wall of the house. Dardistown House dates back to the 1600's and has a number of historic features. This additional heavy traffic has the potential to damage the structural fabric of Dardistown House. The additional traffic will also add to noise levels effecting the house. Your proposal to increase the bus traffic along this route is therefore unacceptable.

We strongly object to the strip of land you have suggested taking from Dardistown Cemetery and Dardistown House. This is the entrance into these lands and this will substantially reduce the sight line for exiting traffic. This is a matter of safety and we

believe has not been taken into consideration. It will also affect any future development potential for these lands with the reduced entrance. We therefore strongly object to your proposal to take these lands and seriously affect the entrance.

Yours sincerely

Michael Holst
for Clifton Scannell Emerson Associates

cc George McCullough

Photo.1-Entrance to Dardistown Cemetery (Section of wall at Lamp post)

Clifton Scannell Emerson
Associates

Clifton Scannell Emerson
Associates

Photo.2-Entrance to Dardistown House

Photo.3-Line of sight to entrance of Dardistown House

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

--
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[redacted]

[redacted]

Right-click here to download pictures. To help protect your privacy, Outlook prevented automatic download of this picture from the Internet.

[redacted]

Comments:
To whom it Concerns,
I wish to submit my objection in respect of the proposed Swiftway Bus Rapid Transit – Swords/ Airport to City Centre, with particular emphasis upon the selected emerging preferred route for the BRT from the R132 at the Estuary Roundabout through the Glen Ellan distributor Road to the proposed terminus in Oldtown.
This section of the proposed route flies in the face of due diligence in respect of proper planning and assessment of local transport objectives and requirements as set out by an elected body for an area, which in turn will lead to unnecessary and unacceptable impacts upon the receiving environment.
While the Route Options Assessment Report assesses transport planning policy documents in respect of the proposed scheme, and states in its conclusion (Section 2.8) that 'The need for the scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North. BRT is identified as serving this purpose and allowing key development areas such as Swords to continue to develop in advance of this'. The route selected does not take account of the transport objectives within the Fingal Development Plan 2011 to 2017 or the specific objectives of the Oldtown – Mooretown Local Area Plan (LAP).
Within Section 6.2 of the Route Options Assessment Report, where the stage 1 assessment is carried out, a specific route option should have been assessed in accordance with the Key Transport objective of the Oldtown – Mooretown Local Area Plan, i.e. Section 3.2.7 of the LAP 'Quality Bus Network'. This quality bus network route was based upon an Integrated Traffic Model which was prepared for Swords as part of the document 'Your Swords, An Emerging City, and Strategic Vision 2035'. The absence of this route which would have been in accordance with Fingal County Councils transport policy for the local area, shows an absence of proper planning assessment within the Route Selection process.
The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellen Road extension, in particular in respect of Section 3.2'Movement Strategy and Transportation Infrastructure', where section 3.2.5 'Glen Ellan Main Street' of the LAP sets out the proposed objectives of the LAP for the Glen Ellan Road. The LAP objective is for a 6m carriageway with cycle facilities, 4m wide footpaths and 1.5m wide tree lined verges, whereas the BRT is proposing 13m wide carriageway with 2m wide shared surface cycle facilities, 2m wide footpaths and the omission of the tree lined verges. While Section 6.3.2 of the Route Options Assessment Report references the LAP, it then proceeds to disregard the requirements and objectives of the LAP without taking due cognisance of it as a constraint upon the proposed scheme.
Through breaching specific objectives of the LAP, e.g. Key Objectives Transport 'Redesign the Glen Ellan Road Extension so that it's function changes from a distributor road to a main street, which will serve 2 schools, a large park and Local Centre, in addition to dwellings'the proposed route as planned will have a direct and unacceptable impact upon the existing properties which bound the Glen Ellan distributor Road in respect of noise, air quality, road safety, transport integration, landscape and visual.
Through the planned frequency of buses along this route during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of

such duration that it will be in breach of Statutory rights of the residents in accordance with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe), which will subjected to the unacceptable levels of noise.
As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not taken into account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.
At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together and Gaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.
Added to this is the increased road safety issue which would have been identified had a Stage F road safety audit been carried out as the site lines at the estate entranceways are proposed to be substantially reduced due to the increased carriageway width and the proposal to replace the existing footpath/ verge/ segregated cycle track (circa 5m) with a 2m footpath.
Finally, in response to the economic appraisal carried out as part of this route assessment and in particular the emphasis in the reliability of the journey time in promotion of the BRT. It is of note that while the BRT may replace and improve upon existing public buses, there already exists a private express bus service, serving the Glen Ellan distributor road which provides sufficient frequency and reduced travel times in comparison to the public bus service. As such there could be no appreciable cost benefit in spending money on a service to double up and compete with that already in place.
Whereas should the final section of the BRT follow that proposed within the Oldtown – Mooretown Local Area Plan and the report, 'Your Swords, An Emerging City, Strategic Vision 2035' it would complement the existing transport provisions to the Swords Area, improving the service to a catchment area not already served by a reliable express service and it may make economic sense.
Yours Faithfully
Martin Blake

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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 10:09
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

From: danny bolger
Organisation: Sandford wood residents Association
Address: sandford wood

Comments:
to who it concers,I would like to object to the proposed ,Swords/city centre swiftway route..As this is a busy road as it is with a lot of schools and housing around it and would in my opinion cause a big concer for the safety of children, in and around the area and bring a bigger volume of traffic on to an already busy road in the mornings and evenings.The goverment should think about putting back the proposed rail link instead(metro north)

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 13:14
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Please extend bus service to knocksedan. With having teenagers having to navigate un lathes walkways or through woods to access bus service it is a case of an accident perhaps fatal accident waiting to.happen

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 25 November 2014 09:37
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
While any effort to alleviate the desperate state of public transport in Swords is to be commended, I'm not entirely sure this is the way to go about it.

It seems short-sighted to exclude (yet again) the outreaches of Swords Manor and even more short-sighted to not take in Holywell. The public is already poorly served by buses in Holywell, with only Swords Express going through regularly. It's a long way from the Pinnock Hill junction to the back of Holywell. If the proposed Tesco goes ahead between Airside and Holywell, the situation will only be made worse.

It furthermore would seem to be unnecessary to relocate the skate park opposite the fire station. It's a much used amenity.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 17:33
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Scrap the whole thing.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:56
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: BRT_Consultation_-_Conor_Brady.docx

[redacted]

Comments:
See attached .docx file for comments

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For the attention of the

National Transport Authority,

a submission on the

Proposed Swiftway Bus Rapid Transit Scheme

[redacted]

1 General Route

The BRT route between the proposed stops at Earlsfort Terrace and Estuary is acceptable. The route north of Estuary does not take full advantage of population catchments in the north Swords area. I suggest the route north of Estuary be modified to follow Castlegrange Road and Broadmeadow Road. The loss of open space amenity is mitigated by the vastly improved public transport infrastructure provided by BRT.

2 Merrion Square

The proposed cycle arrangements on Merrion Square are unacceptable. Best practice indicates that where cycle lanes and car parking are provided side-by-side, the cycle lane should be on the footpath side of the car parking. The proposed arrangement will create conflict between people cycling and people parking cars all along Merrion Square West and Upper Merrion Street. This is a retrograde step in terms of cycle infrastructure in the city. I suggest that the protected cycle track skirting the BRT stop continue the length of Merrion Square West and Merrion Street Upper.

3 Merrion Street Lower

The emerging preferred route indicates a gyratory arrangement at Merrion Street Lower, Clare Street, and Leinster Street. This is inefficient. Both northbound and southbound directions should be accommodated side-by-side at this location. The staggered junction between Merrion Street Lower and Westland Row can be modified to accept two-way bus movements. This in turn allows for Clare Street to become a two-way street for non-BRT bus routes. This suggested arrangement reduces by one the number of junctions that BRT must navigate, leading to time savings. Furthmore, the total distance covered by the northbound route would be decreased.

4 Pearse Street

The proposed junction design at Pearse Street and Westland Row is inappropriate for a city-centre location. The design does not allow cycling northbound from Westland Row to Lombard Street. This is an unacceptable omission that creates impermeability. The "right-turn box" for cycles on the Pearse Street side of the junction is a poor attempt at allowing right turns from Lombard Street to Pearse Street westbound.

5 Tara Street

The addition of a counterflow cycle lane on Pearse Street is welcomed. Provision at the junction of Tara Street should include markings on the road alerting people in cars that there is a contraflow cycle lane. Otherwise this three-lane crossing will be compromised.

6 O'Connell Bridge

Proposed cycle provision at O'Connell Bridge is insufficient. I suggest that a "Dutch style" junction be incorporated here so as to protect cyclists from the many conflicting car movements in this busy junction.

7 O'Connell Street

The proposed northbound and southbound BRT stops on O'Connell Street are too remote from Abbey Street Luas stop. This renders inefficient transferring between BRT and Luas. The stops should be located beside the junction with Princes Street North.

8 O'Connell Street car traffic

Maintaining one southbound lane for mixed traffic, including private car, is unnecessary. I suggest that O'Connell Street be closed as a through route to private car traffic, and that only access to car parks be maintained.

9 Location of BRT Lanes

BRT lanes should run in the centre of the street. Having BRT lanes run laterally undermines the entire BRT Scheme. Centre-running of BRT lanes is standard in BRT provision. Failing to provide for centre running along the majority of the route renders the Swiftway Scheme as non-BRT. What is being proposed is a revamped version of the existing QBC along the route. This is absolutely unacceptable.

10 Reconfiguration of adjacent bus routes.

There is no indication of how adjacent bus routes will be affected. Given the proposed level of service that BRT will provide, it is inevitable that services on routes such as the 41 and 16 will be curtailed. Such curtailment in service may not warrant the addition of "regular" bus stops along the proposed BRT route. In certain instances, and particularly in the city centre, is would be pertinent to examine how non-BRT routes may better be accommodated elsewhere. Routing non-BRT buses down, for example, Capel Street or Gardiner Street would mean that non-BRT bus stops would not

have to be accommodated into the city centre segment of Swiftway. This would speed up the BRT route.

11 Operation of the route

There has been no consultation on how the route will best be operated. The National Transport Authority seems to have begun with the idea of introducing a unique and specific vehicle type, as though that was the most important element of BRT. Nowhere has it been indicated that other service patterns have been investigated. Such may include retaining the existing routes along the corridor and amalgamating them into a "trunk route" with branches along the way.

12 Planning Application

Lodging an application for planning permission for the proposed route, or any modifications thereof, is entirely premature. The National Transport Authority has not indicated what design brief they are working off. Deciding the route before deciding how the system will be operated is an example of poor planning and project execution.

13 Prior Consultations

The results of the first consultation have not been made public. As such, there can be no scrutiny as to whether suggestions from the consultation have been incorporated into the current design proposal. This is undemocratic and should be investigated by the Minister for Transport.

Thank you for your attention. I trust that each of these points will be addressed once the report on this consultation is published. I look forward to seeing an improved project emerge from this public consultation.

[redacted]

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 13:31
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
No bus route would like Knocksedan to be added to route

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 20:37
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Hi
I would like to complain with the proposed location of the swift way bus , I live in [redacted] in swords which is a quite residential location , putting up to 250 buses up and down this is simply dangerous to the numerous children in the area, not to mention the impact for the three junior schools in the location, buses after rush hour are empty there is no need to put this bus in this area and I strongly object.
Regards
Robert Brophy

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:58
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
I would like to welcome the NTA decision not to proceed with putting the Swiftway bus through the green area adjacent to the Pine Grove Estate and hope that the final routing will continue to take all residents concerns in the area on board.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:11
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

--
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Sent: 28 November 2014 16:50
To: Conor McGrath; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; david.king@nationaltransport.ie; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Gannon_Properties_submission_BRT_Consultation_Nov_2014.pdf

From: Clare Burke, Conroy Crowe Kelly Architects & Urban Designers, 65 Merrion Square Dublin 2
Organisation: on behalf of Gannon Properties
Address: 52 Northumberland Road, Dublin 4

Comments:

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C O N R O Y C R O W E K E L L Y
A R C H I T E C T S A N D U R B A N D E S I G N E R S
65 MERRION SQUARE, DUBLIN 2 PHONE 661 3990 FAX 676 5715

0373b

Our Ref: 1228/cb

BRT Consultation,
National Transport Authority,
Dun Sceine,
Harcourt Lane,
Dublin 2.

28th November 2014

RE: Swiftway BRT Swords to City Centre Route – Public Consultation Response - Proposed serving of the Mooretown lands in West Swords by the route

Dear Sirs,

Further to previous submission to the February-March Consultation Process (letter dated 18th March 2014) with respect to the Mooretown lands, please find attached submission, on behalf of our client Gannon Properties, with respect to the Preferred Swords to City Centre Route for the Swiftway BRT Public Consultation Process October – November 2014.

The submission proposes the phased extension of the design of the route to directly serve the Mooretown lands.

We trust the attached is satisfactory, but should you have any further queries please do not hesitate to contact the undersigned.

Yours faithfully,

Clare Burke
CONROY CROWE KELLY
ARCHITECTS AND URBAN DESIGNERS

W:\2012\1228 - Mooretown Masterplan\NTA\1228 Swiftway submission cover let 2014-11-28.doc

Proposed Scheme Public Consultation for the proposed Swiftway BRT Swords/Airport to City Centre Route, October-November 2014
Submission on behalf of Gannon Properties with respect to the lands at Mooretown, Swords, Co. Dublin

---

This submission is in response to the Proposed Scheme Public Consultation for the proposed Swiftway BRT Swords/Airport to City Centre Route, October-November 2014.

It is made on behalf of our client Gannon Properties, who are the owners of land either side of the Rathbeale Road at Oldtown and Mooretown in west Swords. Our clients welcome the provision of such a swift reliable service to serve this growing residential population of west Swords and particularly its extension along the Glen Ellan Road into Oldtown which forms part of the major growth area of Swords on its western edge.

The lands at Mooretown, which lie on the other side of the Rathbeale Road from Oldtown also form part of this growth area. Both the Oldtown and Mooretown lands are planned to provide a new residential district for Swords under the Oldtown-Mooretown Local Area Plan (LAP) 2010. They have the potential to accommodate 3,400 units, at a net density of 35-50 dwellings per hectare, resulting in a population of circa 10,000 people. The planning and development of the lands covered by this Plan is well under way as much development has been permitted and construction commenced.

The land owned by our client Gannon Properties are shown in *Figure 1*, superimposed on the LAP map.

The purpose of this submission is to seek to extend the route into Mooretown on a phased basis as it has the same status as Oldtown in the LAP and the same time-frame for its development. Mooretown, like Oldtown, is a planned new residential area to be served by a local centre with neighbourhood facilities. It is to be served by 2 primary schools and also by a 1000 pupil secondary school. In order to make prvision for the extension of the BRT into Mooretown, i.e. reserve land, some confirmation of intent to allow for the extension on a phased basis is needed.

It can be seen from the Local Area Plan that a new emerging population at Mooretown will provide its own population catchment for the route. Importantly the secondary school at Mooretown will generate a morning movement westward and evening movement eastwards, in the opposite direction of commuter flow, and so fill otherwise empty buses. A BRT service should also save dedicated trips to the two Primary Schools if younger children travel on the BRT accompanied by an older sibling attending the secondary school.

It is also to be noted that without this extension the most direct north-south walking routes to the Oldtown stop would be through the Rathbeale Archaeology Park. Due to the archaeological remains under this park no playing pitches are permitted and so no nighttime sporting activities possible. This will discourage footfall to the stop from the south. Mooretown needs to be served by its own stop.

Two permissions have been granted to date for the Mooretown lands:

<u>1) Permission PL 06F.241634 (F12A/0270)</u>
The first permission granted was for the Mooretown section of the Swords Western Distributor link road. This road forms the western edge of the Mooretown LAP lands. This road connects northwards into Oldtown. At its junction with the Glen Ellan Road the current BRT terminus is proposed.

2) Permission F14A/0012

The second permission is for an access road and services enabling works to serve the future school campus site, at the Mooretown local centre. The Department of Education is actively seeking the development of this schools campus site thence the above planning applications. Permission was granted in August 2014.

An application for planning permission for the first 250 residential units at Mooretown will also shortly be made on behalf of our client. It is anticipated that the first phase of housing and the schools are likely to be in place before the BRT arrives.

Our clients seek that the design of the route extends into Mooretown along the permitted distributor road and also using new residential street network as the turn-around loop for the route (see *Figure 2)*. The potential exists for the roads to incorporate the required segregated lanes for BRT. The detailed design can be worked out as part of the next stage of this route of this design process.

In summary the phased extension into Mooretown will enhance the efficiency of the BRT by encouraging reverse peak journeys. In order to ensure that a reservation is made in Mooretown for the BRT some indication of future intent to extend on a phased basis into Mooretown is required.

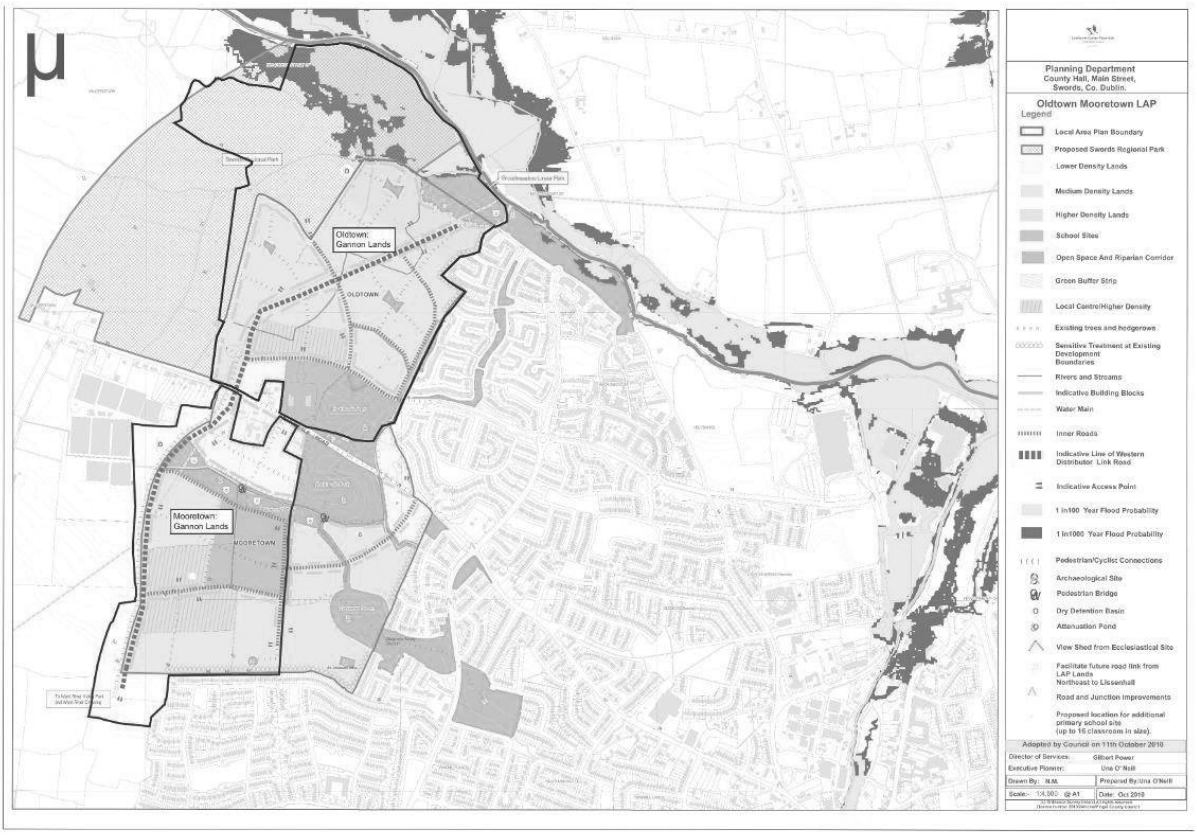

Figure 1

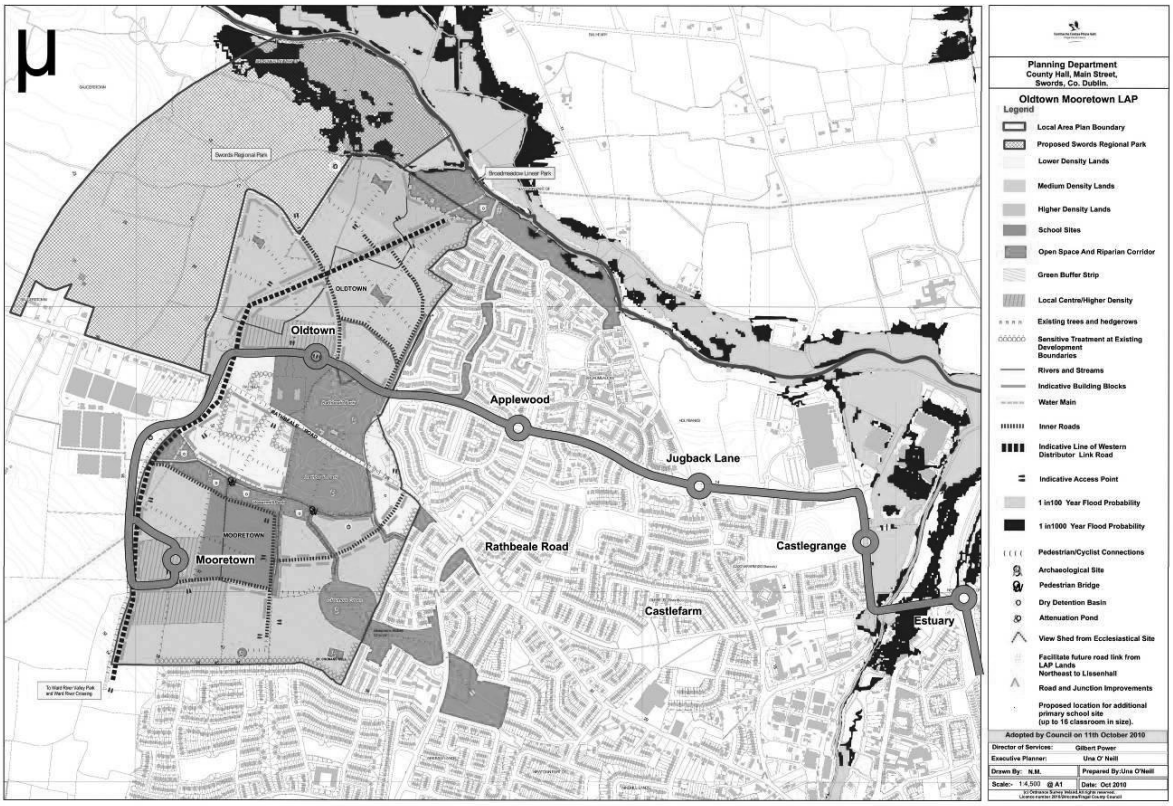
Oldtown
Applewood
Jugback Lane
Castlegrange
Estuary
Castlefarm
Rathbeale Road
Mooretown
Planning Department
County Hall, Main Street,
Swords, Co. Dublin.
Oldtown Mooretown LAP
Legend
Local Area Plan Boundary
Proposed Swords Regional Park
Lower Density Lands
Medium Density Lands
Higher Density Lands
School Sites
Open Space And Riparian Corridor
Green Buffer Strip
Local Centre/Higher Density
Existing trees and hedgerows
Sensitive Treatment at Existing Development Boundaries
Rivers and Streams
Indicative Building Blocks
Water Main
Inner Roads
Indicative Line of Western Distributor Link Road
Indicative Access Point
1 in100 Year Flood Probability
1 in1000 Year Flood Probability
Pedestrian/Cyclist Connections
Archaeological Site
Pedestrian Bridge
Dry Detention Basin
Attenuation Pond
View Shed from Ecclesiastical Site
Facilitate future road link from LAP Lands Northeast to Liesenhall
Road and Junction Improvements
Proposed location for additional primary school site (up to 16 classroom in size).
Adopted by Council on 11th October 2010
Director of Services: Gilbert Power
Executive Planner: Una O' Neill
Drawn By: N.M.
Prepared By:Una O'Neill
Scale:- 1:4,500 @ A1
Date: Oct 2010

Figure 2

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Notes:

Facing Morton Stadium
Serious drainage problem at bus shelter outside my house. Road floods after heavy rain.

One concern is that if the old wall is removed facing our house it should be replaced using the existing stone or a quality granite wall be put in place and not just a block wall.

[redacted]

From: Cormac Ross <Cormac.Ross@nationaltransport.ie>
Sent: 15 October 2014 07:48
To: David King; Donal Mc Daid; Eddie Feely
Subject: Fwd: Bus Rapid Transit Public Consultation

FYI

Begin forwarded message:

[redacted]

From: Councillor Darragh BUTLER (FF)
Organisation: Fingal County Council
Address: Swords

Comments:
BRT Swiftway will not be accepted as a replacement or some sort of consolation prize for Metro North. The people of Swords and North Dublin want Metro North or some sort of light rail system for Dublin Airport, Swords and North County Dublin. It cannot be the case that Luas and light rail is good enough for the south-side but we are expected to make do with bendy buses instead on the north-side. Fuller more detailed submission to follow at a later date.

COUNCILLOR DARRAGH BUTLER (FF)
SWORDS

--
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--
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[http://transportforireland.ie/email/images/footer_r1_c1.png]<http://www.transportforireland.ie/available-apps/>
[http://transportforireland.ie/email/images/footer_r2_c1.png]<http://www.transportforireland.ie/available-apps/>

[http://transportforireland.ie/email/images/footer_r3_c1.png]<https://twitter.com/TFIupdates>

T? eolas sa teachtaireacht leictreonach seo a d'fh?adfadh bheith pr?obh?ideach n? faoi r?n agus b'fh?idir go mbeadh ?bhar r?nda n? pribhl?ideach ann. Is le h-aghaidh an duine/na ndaoine n? le h-aghaidh an aon?in at? ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amh?in at? an t-eolas. T? cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an t? a bhfuil an teachtaireacht ceaptha d? b?odh a fhios agat nach gceada?tear nochtadh, c?ipe?il, scaipeadh n? ?s?id an eolais agus/n? an chomhaid seo agus b'fh?idir d'fh?adfadh bheith m?dhleathach.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 10:13
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
hi will we get a feeder bus to/from knocksedan

--
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From: WordPress <forms@ntawebsite.ie>
Sent: 27 November 2014 21:01
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Gaelscoil_Bhrian_Boroimhe_Cairde_na_Scoile__Submission_on_Swiftway_Bus_Rapid_Transit_November_2014.docx

From: Gaelscoil Bhrian Bóroimhe Cairde na Scoile
Organisation: Cairde na Scoile
Address: Coill na nÚll, Sord, Baile Átha Cliath.

Comments:
Attached please find a submission from the Gaelscoil Bhrian Bóroimhe Cairde na Scoile on the proposed Swiftway Bus Rapid Transit. If you have any queries on our submission please contact Grace Cappock, 087 2024971.

--
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'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

To whom it may concern,

Cairde na Scoile, Gaelscoil Bhrian Bóroimhe, wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

We have a number of concerns regarding this route:

1. It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

Yours sincerely,

_____

Grace Cappock (087 2024971)
Cathaoirleach
Cairde na Scoile
Gaelscoil Bhrian Bóroimhe,
Coill na nÚll,
Sord,
Co. Bhaile Átha Cliath

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 10:21
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:58
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:59
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 13:00
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 13:00
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 13:17
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
A bus service is urgently required for our estate , it's a necessity not a luxury !

[redacted]

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:26
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:17
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: BRT_submission.pdf

[redacted]

Comments:
See attached .pdf file

--
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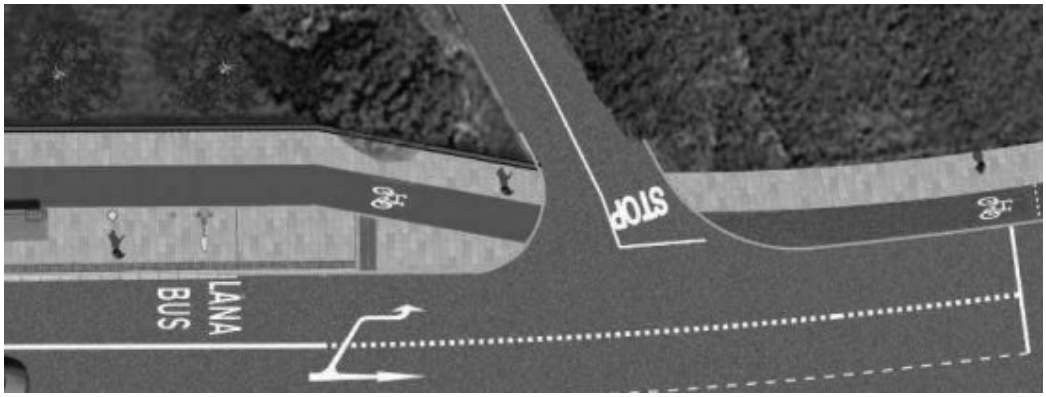
0385b

[redacted]

Re: BRT Consultation; Unclear priority where a new cycle lane passes a side road

Hi,
I noticed in the proposed drawings for the new bus lanes that priority can be unclear where a cycle lane crosses a side road. I've included an example below. The stop line for traffic on the side road extends half way across the cycle lane on the main road and there's no indication to this traffic that they're even crossing a cycle lane. It's unclear whether traffic on the side road should be yielding to cyclists on the main road, or visa versa.



Here's a similar example from the Upper Kilmacud Road, near where I live. This design makes it difficult for cyclists to pass through the junction and, as a result, you generally see cyclists staying in the main traffic lane. I think this is something you'll want to avoid since cyclists using the new bus lases would make the proposed service much less 'rapid'.

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 27 November 2014 22:24
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Submission.doc

[redacted]

Comments:
Comments attached.

--
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[redacted]

Swiftway Bus Rapid Transit – Swords/Airport to City Centre

[redacted]

Dear Sirs

We wish to express our concerns at the proposed construction of the Swiftway Bus Rapid Transit project due to the impact it will have on our locality both short term during construction and long term once it is complete.

We live on the Swords Road in Whitehall which runs parallel to the N1. The area is only now recovering from the affects of the construction of the Dublin Port Tunnel, a project that we supported.

The greenery and foliage that were planted are now maturing and are providing a benefit to the area. I have no doubt but this area will be disturbed during construction and will take at least 10 years to recover. This greenery provides an excellent barrier to traffic noise from the main road and will be lost. We expect that you will reinstate the existing greenery to a high standard. We are also very concerned that the mature trees at the junction of Swords Road and Collins Avenue will be removed, we object to this.

From a perusal of the plans it appears that traffic travelling east on Collins Avenue will no longer have the benefit of a left turn towards the N1/M1 via a slip road but will be forced to wait at the traffic lights to make the left turn north. Not only will this cause significant tail backs on Collins Avenue but we expect this will force traffic onto our road making it impossible for us to exit from our homes. We will also have difficulty exiting from our road onto Collins Avenue, the presence of a yellow box is of limited assistance.

We were unaware of this project until it was brought to our attention via a flyer from a local politician. We inspected the plans at short notice in Whitehall Columcilles sports hall and were told that flyers were distributed in the area some months ago. We never received any information, nor did many of our neighbours who we contacted.

We do not have any detail on the proposed hours of construction.

We hope you tae this limited submission into account.

[redacted]

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:19
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 11:48
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 11:56
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:

--
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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:04
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: 2.2.09.001.BRT_Submission_on_Draft_Proposals.pdf

From: Yvonne Dalton
Organisation: daa
Address: tanya.murray@daa.ie

Comments:

--
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daa cuideachta phoiblí theoranta
Príomhoifig: Aerfort Átha Cliath,
Co. Bhaile Átha Cliath, Éire

T: 353-1-814 1111
F: 353-1-814 4120
www.daa.ie

daa public limited company
Head Office: Dublin Airport,
Co. Dublin, Ireland

Administrative Officer,
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2

Date: 28th November 2014

Ref No: P.2.2.09.001

Dear Sir/Madam,

Re: Draft Swiftway Bus Rapid Transit Proposals - Swords/Airport to City Centre Route

daa, Head Office, Dublin Airport, Co. Dublin, wish to make the following submission regarding the draft proposals for the Swiftway Bus Rapid Transit (BRT), specifically the Swords/Airport to City Centre route.

The daa has previously welcomed the provision of additional public transport proposals which encourage a range of sustainable modes of transport. It is unclear from the display documentation as to whether this proposal will serve Dublin Airport and its employment population.

The proposal as currently envisaged outlines a BRT corridor serving Swords to Dublin City Centre. The route utilises the R132 for this purpose, including the 'airport roundabout' which is the primary interchange between the airport and the motorway network.

The R132 has recently been upgraded as part of the final works associated with the Terminal Two project. This route provides access off the M1/M50 network in addition to linking all permitted long-term airport car parks with the terminal buildings.

In this regard, we would like to understand how the carrying capacity of the airport roundabout will be maintained, particularly having regard to the north/south BRT movement through this junction at four-minute intervals as stated in the consultation documents.

An Bord Stiúrthóirí I Board of Directors: Pádraig O Riordáin - Cathaoirleach/Chairman, Niall Greene, Patricia King, John Lynch, Colm McCarthy, Dos Mullally, Barry Nevin, Eric Nolan, Ann-Marie O'Sullivan, Paul Schütz (German), Doris Smyth, Gerry Walsh, Kevin Toland - Príomhfheidhmeannach/Chief Executive

Oifig Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath, Uimhir Chláraithe: 9401 Éire
Registered Office: Dublin Airport, Co. Dublin, Registered Number: 9401 Ireland

We also note that whilst there is an indicative BRT stop indicated on the South Corballis Road within the airport, there are no details regarding the route through the airport, or how passengers who may use the BRT would ultimately reach the terminal buildings.

We would like to request a meeting to understand how these items will be addressed prior to the lodgement of the planning application for the final Switfway proposals.

Yours sincerely,

Yvonne Dalton,
Head of Planning

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 21:17
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
This proposed bus service will directly affect an excellent local private bus service swords express by effectively taking some of it's route. The private arrive has served local estates such as Holywell extremely well over the past few years with a regular bus route taking just 15 minutes from my door to town via port tunnel.

By allowing this swift service to take business from the swords area will directly affect the viability of swords express meaning that local estates such as mine will not have access to a regular clean and excellent private bus service. This new proposed bus service should only serve the airport to city centre; there is no need to undermine the economic viability of a popular quick and efffcient private bus operator. I object to this current proposal and will lobby who I need to to reject undermining the economic viability of swords express which serves mind and many local estates on swords so well

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 22:35
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

From: Paul Delany
Organisation: Skatepark community of swords
[redacted]

Comments:
On you're drawing plans for the new Swiftway route it states that the skatepark is to be relocated but does not show on any of you're plans where it will be relocated to. This has caused concern to me and to our skate park community. As members of the community we were lucky to have received the skate park in the first place and being at the age of 16 it is a major part of mine and my friends social life and a sport which we a all enjoy bmxers and skateboarders alike. In Swords there is already a serious lack of services for young people. Anywhere else in Swords we are told to move away from buildings and reported to the Gardai and we are treated like delinquents. To demolish our skatepark is the equivalent to demolishing a play ground.
Please could you give me some assurances that a new skatepark of the same size and quality will be built close by.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 10:30
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
I am against the route for swift way as it will cause chaos for our area and major chaos at and near our primary school.
Deirdre Dodd

--
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If you'd like to unsubscribe and stop receiving these emails click here.

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:31
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
I wish to raise concerns about the preferred route identified for the swift way scheme
My child currently attends gaelschoil bhriab boroimhe we have a number of concerns regarding this route
1. It is necessary for some parents to drive their children to and from school the route proposed means that parents can no longer park between apple wood and old town stop. This will create significant difficulties for parents trying to get their children to school as they will loner be able to drive and as a knocksedan resident we are not on any bus route as is…
2 parents will be forced to park cars in nearby estates leading to further congestion in these estates (castleview)
3. There will be an increased volume of traffic on this road creating further congestion and delays for parents trying to get children to school also further danger for children walking to school

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 23:28
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: ConsultationQuestions.odt.pdf

[redacted]

Comments:

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Submission on Swords to Dublin Busway proposal.

[redacted]

These Questions are to be read from the point of view of a cyclist, unless context is clear otherwise.

General comments about the proposed scheme: the nta propose to vastly increase the mixed pedestrian / cycling paths. The National Council for the Blind strongly disagree with these as they seriously impinge and cause alarm to blind path users. They are dangerous as they confuse where are foot paths and where are road traffic. They are also dangerous for families, as young children who have learned to walk on a path will wander aimlessly in front of vehicular traffic. There are also dangerous as cyclists will have to travel very slowly and are thus more likely to wobble or fall, without the stabilising gyroscope effect from spinning wheels.

There are a huge number of traffic lights proposed for cyclists to get from the M1 junction at Lissenhall to the M50 underbridge. At the minute there are 8 sets. Some junctions propose to have 5 traffic lights just to progress 50 metres on the r132…

A corollary to this is the plan proposes no pedestrian crossings across the M50 at the r104, to get from the residential area NE of the junction to the busway

stop NW of the junction. At the public open evening, it was suggested, the nra wouldn't be happy changing this. The NRA claim "the Authority's primary function, under the Roads Act 1993, is to secure the provision of a safe and efficient network of National roads." It is hard to see how not providing safe crossing of the M50 to connect a residential area with public transport infrastructure is in keeping with their primary function.

While less confident cyclists might prefer not to cycle on road, regular commuters should be facilitated by designing for through useage in bus/cycle lanes. The farcical situation Fingal Co Co have at Dublin Airport where cyclists can either use shared walking and cycling paths which keep turning off the r132 route or cycle in the main traffic lane, leaving the left bus only lane, will be remedied, by allowing cyclists legally use bus lanes.

Estuary Roundabout

What is the design speed of cyclists? What is the design speed for motorists?

How are cyclists to turn from r132s to r125?

How to get from r125 to r132s

How to get from estuary to r132n?

What is the increase in cycling time?

What is the projected energy of cyclists wasted?

The proposedR132n has no safe cycle route, unlike now.

R132s has no safe cycle route unlike now.

How do pedestrians and cyclists cross safely from Seatown west to the football pitches?

How do cyclists travel north on Balheary road?

Why no height difference between footpath and cycle lane? Pedestrians will stray onto cycle lane without a kerb.

Why is there no Interchange between 33 bus (and variants) at the North side of Swords? At a public info evening it was suggested 33 passengers could change south of Swords, after sitting in traffic watching the busway busses pass...

Seatown Rab

How to get safely through on r132s

How to get through safely on r132n

how to get from the seatown road to the r132s

how to get from the recycling centre to the r132n

how to get from the r132s to seatown road

how to get from the r132n to estuary?

Why staggered pedestrian crossings on seatown road?

Why no crossing on the original seatown road?

Why get rid of hard shoulder between Seatown road and Malahide road?

What is the design speed of this section?

Malahide Road

How to cycle from Kinsealey to Lusk?

How to cycle north on r132

How to cycle south on r132

How to get to the Pavillions on r132s

How to cycle safely on r132s

How to get from Pavilions to Kinsealey?

Pavillions

The existing bus/bike lane is proposed to be removed. This hardly makes this section safer to cycle.

Mixed pedestrian/bike lane on r132s on Pinnock Hill.

Airside/Boroimhe

r132s mixed bike/pedestrians? wtf is wrong with existing bike/bus lane?

r132n bike lane goes off route?

Are cyclists expected to yield to motorists buying fuel at texaco?

How to get from airside to Boroimhe

How to get from Boroimhe to Airside

How to turn right?

r132s are cyclists expected to divert and yield at chainage 6050?

r132s are cyclists expected to cycle on the right between chainage 6050 and 6150?

r132n are cyclists expected to yield to people waiting for the bus at chainage 6100

Cloghran

Why is yield line on Baskin lane in middle of cycle way?

What is designed method of getting from Lusk to Dublin through Airport rab?

A pelican crossing across the M1 slip and a new cycle way outside the proposed busway would provide a much more direct route towards Dublin.

Cyclists rounding the airport roundabout would get the same green time as

vehicular traffic, and motor traffic on the r132s would only be able to join the m1 at the north slip. I believe very little traffic makes this secondary movement, an busway traffic will reduce this more.

Why do cyclists on r132n have to leave the route at airport rab?

Why the yield line at ulster bank in the middle of the cycle lane?

Is there to be northbound busses @60kmh, Sb cyclists and Nb cyclists, 2-way pedestrians from Chainage 7250 south? What safety separation will be provided from ~100kmh head on collisions?

Airport

Who is going to use the shared cycleway/pedestrian path from chainage 7800 -7950?

Again is there to be separation from nb busses,sb cyclists,nb cyclists on the 2 way cycle path from airport rab to chainage 7950?

There seems to be 4 crossings for cyclists to get sb from 7950 to 8000?

Why is there shared cyclist/pedestrian path outside a pub? drunk patrons should be segregated from cyclists

Why is there not cycle lane across the lane ways to Kealy's car parks or the buildings south of it?

Why is the lane to straight instead of the left/right zig zags at the car park lane at Kealy's?

Why aren't the crossings between 7950 and 8000 tangential to the curve, instead of normal to it? This would allow cyclists maintain speed through the junction when they have the green light.
Will these crossings be weighted to motor vehicles or cycle lane traffic?
Same questions for the junction at 8150 to 8250

Are cyclists supposed to take 6 crossings to get from the r132n to alsaa/car hire?

why the gap in cycle path between 8550 and 8500 nb? This access is for airside qualified personnel and they should be able to drive professionally enough to be able to traverse a cycleway safely?

Why the gaps in cycleway on the sb side from 8550 to 8800?

Collinstown

Why the different marking for the cycle lane on road from 9000 through the junction? sb

What is the planned way for cyclists to cross the junction nb?

Why the curved start of cycleways at this junction? Will these be absolutely flush with the road? or can straight starts be provided at >60deg to the direction of travel?

The shared cycle/footpath egressing the cemetery seems narrower than the nta standard?

From 9150 to 9250 there is shared cycle/footpath and a cycle path on nb is but cycle path and footpath on sb direction?

Outline the cycling access to the park from r132 nb/sb

Why the break in cycle lane at Glen Dimplex 9650?

Turnapin

Are the traffic islands at turnip lane sb to be removed?

Will the junction light sequence be improved for cyclists? It's painfully slow at present

Will curved cycle way start be removed at turnapin lane r132s section?

Why no shared use path at northwood brt stops? how are pedestrians to cross the cycle lane?

The shared use path at northwood brt stop sb is a disaster waiting to happen. cyclists hit speeds of 60 here, down the hill.

How do cyclists get into Northwood from r132s?

There is no footpath from northwood ave. to chainage 10700. Very narrow shared use path. Does this narrow path meet nta rules?

How do the nta propose dealing with vehicles parking on the shared use path from Santry Close south?

If the road is to be widened, why not provide separate cycle paths and footpaths?

Coolock Lane

What is the junction planned for the R104/r132?

Why no cycle lane through the junction of r104/Oak Avenue

Why no cycle lane through junction of oak park avenue r104

How to turn right at this junction?

Why no pedestrian crossing of motorway slips

Why no cycleway crossing of motorway slips?

Why no cycle infrastructure on the n50?

Whitehall

The existing cycle track at the Collin's Avenue Swords road has considerable conflicts with pedestrians walking aimlessly across cyclists. there should be separate, clearly defined, different height paths here.

Consideration should be given to allowing a contraflow cycle lane into Larkhill from the foot of Shantalla bridge, to allow residents, pupils at the schools in Larkhill and on Collins Ave, along with access to DCU. This will help with users of the stop at Shantalla bridge, bussing and biking.

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 21:15
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
To Whom It May Concern:
I wish to put forward my stringent objections against the proposed Bus Rapid Transit – "Swiftway" service and the preferred route starting at Oldtown/Castleview. I have the following concerns and objections, in particular affecting myself as a resident of Bunbury Gate/Brides Glen:

1. The negative impact on residential amenities.
2. Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre
3. The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service
4. The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin
5. The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express
6. The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre
7. The lack of planning for park and ride facilities
8. Increased noise at night with late buses proposed (and the possibly of unruly behavior with "night-links"

I also strongly object to any changes and/or removal of
• walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – this is unacceptable and will not be allowed by residents in the area.
• The removal of existing mature trees and bushes
• The replacement of these walls/railings with a brick/railings not matching current walls
• The moving of the local skateboard park – it took the area long enough to get such a facility and again shows a total lack of consideration for residents and their children
• The increased noise, pollution and risk of accidents along the Glen Ellan corridor road
• The increased pressure on vehicles exiting the estate (at both entrances/exits)
• The lack of planning for signals at these entrances/exits
• The proposed narrowing of the entrances to the estate
• Increased traffic with people from "outside" the area coming to use the service
• Major issues with people using the estate as a car park as there has been NO provision for parking at the new service terminus. This has been viewed as wholeheartedly a major downfall in this proposal and quite frankly insulting to the local residents. People will no doubt use our estate to park their cars in while they get the service into town/to work for the duration of a whole day. This increases the risk of children being

hit by vehicles in our estate and makes our estate a less safe place for our children to play
• The fear of pay and display arrangements being introduced to local estates
• The total lack of consideration for parking at the two local schools. This is absurd and shows the absolute lack of consideration for residents, teachers, parents and most importantly school children attending these schools. It is not only ridiculous to remove parking for the two schools but to put our children at risk in such a way is totally unacceptable. On this point ALONE we will be fighting this proposed route.
• An unnecessary and increased risk for children walking to school
• With the average time for journeys being quoted at "40-45 minutes" there really is no time saving for commuters, couple this with having to share an already route with 2 other bus companies!
• No guide has been given as to the cost of journeys
• Increased littering and loitering at proposed bus routes
• Potential decrease in value of property adjacent to a busy bus terminus
On a more personal note, my partner and I have worked hard to afford a house in a quite estate which is within safe walking distance to schools. We purchased a house in this estate not envisaging that we would be penalised by removing, reducing and interfering with our estate boundaries which provide for a safe environment protecting all residents from the road , allowing the children of our community to play safely within the confines of our estate.

I am shocked and baffled at the total lack of planning or provision with regards this future planned corridor and can see this length of road from the terminus becoming a "drag strip" for anti social driving and a meeting point for so called "boy racers".

It also shocks me that this is being implemented as a short to medium term solution, as the widening of roads and the building of a terminus does not appear to be a short term action, when metro north is implemented will our estate be returned to its original boundaries and the road returned to a 2 lane road?

Also from a personal observation , buses which travel from Swords Manor via Applewood with both Dublin bus and the Swords express are at time practically empty , an increase in buses for these services during peak times would be a more effective use of resources.

Thank you for taking the time to read my submission. I would kindly ask that you confirm receipt of same.

[redacted]

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 11:11
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 11:21
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been trying for over 10 years, without success, to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT/Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops. Please don't leave us isolated once again. Thanks you.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:18
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Please include knocksedan estate as priority for the swift way route. We are completely isolated with no public transport whatsoever. I have 3 children who cannot get to school, meet up with friends, after school activities, etc unless it am available to take them. This is a crazy situation with so many teenagers living in the estate.
Regard,
Linda fagan

--
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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:43
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: BRT_submission_28_November_2014.pdf

From: Garrett Fennell
Organisation: Mountjoy Square Society
Address: 25 Mountjoy Square

Comments:
Please see the attached submission on the proposed NTA route for the BRT on behalf of the Mountjoy Square Society – I hope that this will be taken into consideration in the context of the final route selected.

Regards

Garrett Fennell

--
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National Transport Authority

Harcourt Street

Dublin 2

28 November 2014

Consultation process on route of proposed BRT Swiftway between Swords and Dublin City Centre

Dear Sirs,

The Mountjoy Square Society is a company limited by guarantee which is dedicated to improving Mountjoy Square as a place to live, work and visit.

The MSS had welcomed the original proposed route of the BRT Swiftway between Swords and the City Centre, which envisaged the route coming off Dorset Street, along Belvedere Road and through Mountjoy Square North, before accessing Parnell Square along Great Denmark Street. The revised route, which is the subject of the current consultation has abandoned this proposed route and instead proposes to run the BRT Swiftway along the existing QBC on Dorset Street and coming onto Parnell Square through North Frederick Street.

The rationale for this change of proposed route is stated in the consultation paper as;

> ***30. Why has the BRT route changed from Mountjoy Square to Dorset Street?***
> *Analysis of existing Dublin Bus journey times indicates that the greatest delays along the Swords to City Centre route corridor occur on Dorset Street between Clonliffe Road and O'Connell Street. For this reason, it was initially proposed to avoid this congested route and to instead bypass it via Mountjoy Square North, Gardiner Place and Great Denmark Street, availing of amendments to the traffic circulation regime to achieve BRT priority.*
>
> *As the detailed route options assessment process was advanced, in consultation with Dublin Bus and Dublin City Council, a more detailed assessment of Dorset Street was undertaken to seek to overcome the existing causes of delay to public transport in this area. In consultation with these stakeholders, a number of adjustments to bus stop locations and local traffic circulation arrangements have been identified that can address and overcome the*

Mountjoy Square Society. Company limited by guarantee. 25 Mountjoy Square East, Dublin 1. Tel: 01 8198590, 086 8260761,
info@mountjoysquaresociety.com, www.mountjoysquaresociety.com
Directors; Bernadette Manning, Karin O'Flanagan, Garrett Fennell,
Stephen Bishop. Registered Number; 488654

sources of these delays to ensure journey time reliability. On the basis that these constraints on Dorset Street can be overcome, it now represents the Preferred Route for the Proposed Scheme. Furthermore, it will avoid directly impacting on existing parking and loading arrangements along Gardiner Place / Great Denmark Street, including drop-off and pick-up at Belvedere College. The Mountjoy Square area will remain well served by public transport by virtue of its proximity to the proposed route corridor on Dorset Street and other existing bus services running along Gardiner Street.

We believe that this rationale is deeply flawed and merits revisiting. The BRT Swiftway is meant to be an addition to the public transport network, rather than a new mode of transport which overlays existing routes that are well served by existing public transport. The Dorset Street area is already well served by existing bus routes and benefits from a dedicated QBC. To overlay this route with an additional BRT service will add to existing traffic flows on this street, and involve additional interference with the pathways to facilitate the construction of BRT stops.

Most critically the selection of this route will do nothing to add to transport provision in the immediate area. Reverting to the originally selected route through Belvedere Road and Mountjoy Square North through North Great Denmark Street will bring a new and much needed transport service to a part of the city that has suffered from remoteness and a lack of direct connection with the rest of the city. The arrival of the BRT to Mountjoy Square was seen as playing an important role in ending much of the public transport isolation that attaches to Mountjoy Square and reconnecting the Square with a vibrant and functioning transport mode.

We would also contend that transport provision should also take into account the important contribution that connectivity can play to urban regeneration and renewal. Instead of focusing on treating the originally proposed Mountjoy Square BRT Route as a bypass to aid avoidance of traffic congestion, the focus should be on reviewing the positive attributes of selecting such a route from a range of considerations. These should include;

- Existing public transport provision (through services rather than buses resting over)
- The availability of adequate public transport on alternative routes being considered
- The contribution that the route can make to urban regeneration and renewal
- The compatibility of the route with the general planning policies of the local authority and its consistency with national policy.

By any of these analyses the revised route is suboptimal to the original route involving the BRT travelling through Belvedere Road and Mountjoy Square North. This is demonstrated by the following;

- Mountjoy Square is poorly served by through public transport services – despite the fact that a Dublin Bus Garage opens onto the Square and Mountjoy Square North is a Dublin Bus terminus, there is a very limited Dublin Bus cross city service through the Square during the day and an extremely restricted service at night time.
- Dorset Street by contrast is well served by numerous Dublin Bus routes .
- A BRT route through Mountjoy Square with a stop on Mountjoy Square North would be a significant boost to the regeneration of the Square. In particular it would help connect the Square with the busy airport/city centre route and would provide direct connectivity across the city. For visitors travelling to Dublin City from the airport Mountjoy Square would be their first introduction to Georgian Dublin. The route would assist with removing the current level of transport isolation which has been a feature of public transport and Mountjoy Square for many

years. It also has the added potential of facilitating access to the Croke Park Stadium and the Croke Park Hotel which are also currently ill served by public transport.

- Dublin City Council has also been involved in a programme aimed at assisting the regeneration of Mountjoy Square and Mountjoy Square Park in particular. The conservation management plan for Mountjoy Square Park has referenced a proposed BRT stop at Mountjoy Square North and the positive contribution that this could make to the regeneration of the Square and the regenerated Park. The Dublin City Council Development Plan also supports the regeneration of the Squares and the broader North Georgian Core. In particular it notes the important potential role that Great Denmark Street can play in connecting Mountjoy Square and Parnell Square – running a BRT along this route is entirely consistent with the fulfilling of these objectives.
- We are not convinced that the potential impact of a BRT along Great Denmark Street will negatively impact on normal functioning of buildings, residences and institutions on these streets – including Belvedere College. The fact that a proposed public transport route would be altered in part to facilitate cars dropping or picking up at a school in a dense city centre environment would seem to run counter to most well understood policy contexts underpinning sustainable transport planning in an urban environment. Surely the objective should be to encourage people to use public transport rather than facilitate additional car journeys into an already congested and poorly performing road network.

We request the NTA to revise the proposed route for the BRT Swiftway to facilitate the route through Mountjoy Square North on the basis of the arguments outlined above.

Yours sincerely

Garrett Fennell

Chairperson

Mountjoy Square Society

Mountjoy Square Society. Company limited by guarantee. 25 Mountjoy Square East, Dublin 1. Tel: 01 8198590, 086 8260761,
info@mountjoysquaresociety.com, www.mountjoysquaresociety.com
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Comments:
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[redacted]

MOUNTJOY SQUARE SOCIETY LIMITED

National Transport Authority

Harcourt Street

Dublin 2

[redacted]

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years. It also has the added potential of facilitating access to the Croke Park Stadium and the Croke Park Hotel which are also currently ill served by public transport.

- Dublin City Council has also been involved in a programme aimed at assisting the regeneration of Mountjoy Square and Mountjoy Square Park in particular. The conservation management plan for Mountjoy Square Park has referenced a proposed BRT stop at Mountjoy Square North and the positive contribution that this could make to the regeneration of the Square and the regenerated Park. The Dublin City Council Development Plan also supports the regeneration of the Squares and the broader North Georgian Core. In particular it notes the important potential role that Great Denmark Street can play in connecting Mountjoy Square and Parnell Square – running a BRT along this route is entirely consistent with the fulfilling of these objectives.
- We are not convinced that the potential impact of a BRT along Great Denmark Street will negatively impact on normal functioning of buildings, residences and institutions on these streets – including Belvedere College. The fact that a proposed public transport route would be altered in part to facilitate cars dropping or picking up at a school in a dense city centre environment would seem to run counter to most well understood policy contexts underpinning sustainable transport planning in an urban environment. Surely the objective should be to encourage people to use public transport rather than facilitate additional car journeys into an already congested and poorly performing road network.

We request the NTA to revise the proposed route for the BRT Swiftway to facilitate the route through Mountjoy Square North on the basis of the arguments outlined above.

Yours sincerely

Garrett Fennell

Chairperson

Mountjoy Square Society

Mountjoy Square Society. Company limited by guarantee. 25 Mountjoy Square East, Dublin 1. Tel: 01 8198590, 086 8260761,
info@mountjoysquaresociety.com, www.mountjoysquaresociety.com
Directors; Bernadette Manning, Karin O'Flanagan, Garrett Fennell,
Stephen Bishop. Registered Number; 488654

Comments:
Please find attached submission in relation to the NTA's Swiftway proposal.

I would appreciate acknowledgment that it has been received.

[redacted]

SWIFTWAY BUS RAPID TRANSIT PROPOSAL
SUBMISSION TO SECOND PUBLIC CONSULTATION

Key Points

I preface this submission by stating that I strongly believe that Bus-Based Transit is the appropriate solution for Dublin's transportation requirements. This should be a combination of Bus Rapid Transit (BRT) for the axes of major demand, and what is referred to in Europe as 'Bus with High Level of Service' (BHLS) as a structuring network for the next-level axes of moderate demand. This needs to be progressed quickly, but it needs to be got right first time.

I consider that the Swiftway proposal, as placed to public consultation, is an insufficient and unsatisfactory design as a BRT, due to being based on a flawed design process. Instead of designing a solution to meet stated transportation requirements such as capacity and service characteristics, the current process is about selecting a route and afterwards seeing what can be fit into it.

This will lead to two inevitable outcomes:

1) The effort is not made to design the BRT to meet future transportation requirements on the corridor. Indeed, a separate NTA study is already underway to find alternative means that may prove far more expensive.
2) The Swiftway design, as presented for consultation, is based on a specific operational model that shows limited understanding, and will be incapable of future expansion to what BRTs elsewhere can achieve.

This means that on one hand we are likely to have to invest far more heavily in the future to meet our transportation needs, and on the other we will get far less than we could have from this initial BRT deployment.

It is also noted that Swiftway does not meet the basic criteria for BRT as defined in the 2014 BRT Standard. In reality, it implements a Quality Bus Corridor at the level they should achieve, by resolving known limitations of current QBCs.

The design process should now be put on hold for corrective intervention. Both the design process and the initial Swiftway design should be subject to independent international review. A new design brief should be developed that requires a bus-based solution to meet the stated transportation needs for the immediate, medium- and long-term needs of the designated corridor.

To be absolutely clear, I do not want to see the BRT project itself halted or frustrated. I want the process put on hold temporarily while the design brief is reviewed and revised by international BRT experts, and to then resume work *from the correct starting point* to achieve a better design and a better and higher-value outcome.

1) The current design process is flawed

The design process itself has many weaknesses. Until these are addressed, it cannot possibly deliver the best outcomes.

- It lacks a clear design brief. It does not set out in clear and quantified terms what the BRT is required to do in transportation terms, neither in its own right nor as its contribution to the integrated network for Dublin
- It lacks a clear statement of the line-haul and station throughput capacity required in different design years such as 2020,2025, 2030, 2035, …
- It lacks a comprehensive assessment of the service plan the BRT requires to support, based on which the infrastructure should be designed
- It lacks a clear assessment of the operational mode to be supported, including the target operational speed, based on which the infrastructure and supporting systems should be designed
- There is persistence by NTA that BRT can only meet the medium-term travel demand, and is thus designed as an interim mode (Chapter 2 of the Route Options Assessment Report (ROAR)) despite extensive international evidence to the contrary that has repeatedly been brought to the attention of NTA.
- What is called "Transport Demand" (ROAR, Chapter 10) is actually modeling the transport impacts of the implemented solution. It is not "transport demand", but an estimation of what would be attracted to the scheme as designed. As this reflects what the scheme designers offer rather than a scheme based on the transportation requirements for various design years (capacity, speed, quality), it is necessarily constrained and is by definition a self-fulfilling circular process.
- It commences with a flawed preconception of BRT and its capacity, based on a model of buses operating at maximum of two-minute intervals. This immediately and needlessly constrains the solution.
    - It predetermines that articulated buses must be used (due to the inflexible concept about BRT), meaning that the majority of passengers will be standing at peak times, which greatly diminishes passenger comfort and BRT attractiveness.
    - It becomes a factor on selection of the southern turnaround point, which in turn influences the South City Route Options (ROAR, chapter 9.6), as well as the usability of some streets. The decision on bus type is driving the design instead of being on outcome.
- There is a failure to consider Luas and Swiftway sharing running lanes in the city centre and availing of common infrastructure in constrained areas. Both services will be at moderate frequency, with driver-controlled vehicles so there is neither a safety-based nor a technical case for not doing so. While shared bus and tram running is not usual, it is implemented in some sections in Oberhausen and Pittsburgh, and I believe also in Gothenburg.
    - Failure to consider shared-running eliminates many of the key streets in south Dublin City, and so severely constrains the Swiftway routing options for the South City that the 'options' are just minor variations.
- The focus of the current process is on insertion of a preconceived concept into the existing roadway, while details and "demand" will be figured out afterwards
- Route selection criteria do not include the carrying capacity that can be achieved. (ROAR, table 5.1 and elsewhere theresafter). This is inexplicable.
- The scheme is not future-proofed. Scope for expansion is limited to moving to 24-metre bi-articulated buses, which are undoubtedly inappropriate for Dublin.
- The current process is almost certain to under-design based on these assumptions, and then become a major constraint for further expansion

The current "design" is about establishing a route and lane configurations, without clear reference to what the BRT is required to do in transportation terms. This will establish the primary design of the BRT that will be difficult or impossible to revisit subsequently.

In turn, this will constrain the initial and future capacity of the BRT, such that it can never reach the capacity the NTA modeling indicate is required in the longer-term for the corridor.

Once constructed on lateral lanes and in operation, it will be virtually impossible to develop a high-capacity median BRT on the same road, due to the disruption it would cause to both the operational BRT and to the general traffic. This would mean that corridor capacity enhancements would have only the choices among rail-based solutions with significant underground sections, or to develop further BRTs on one or more of the other arterials serving north Dublin. Both will be expensive and take time.

Finally, the consultation process itself has a key weakness that contributes to the above. The submissions from the first consultation have not been published, with only a brief summary report being issued. The second (current) consultation makes reference only to the comments about routing (ROAR, chapter 1.5.3), and makes no reference to the concerns and advice received about the BRT concepts and design. A consultation process that will not acknowledge the inputs from the public and the professional community creates the conditions for design teams to persist on their preferred course even when its weaknesses have been highlighted.

2) Swiftway, as currently designed, is not BRT by international standards

Swiftway, as presented for this public consultation, cannot be considered as Bus Rapid Transit when compared to international practice. It is somewhat misleading to present it as 'BRT' to a public that it not well-informed of what BRT can actually achieve and accepts it to be so on face-value. It is also a missed opportunity.

- It does not meet the basic criteria of BRT set out in the 2014 BRT Standard:
    - Almost all of the BRT is lateral running (i.e. bus lanes at the side of the road). Median running way only occurs on the Swords Bypass.
    - Among other things, such extensive use of lateral lanes ensures that the BRT is structurally and permanently impaired by roadside activities, conflicts with turning traffic, cycle lanes adjacent to the BRT lane without physical separation, all of which impose operational speed limitations.
- "Top operational speed of 50 kph in suburban area and 30 kph in City Centre area" (ROAR, chapter 5.3.1.3) cannot be classed as Rapid Transit. Surprisingly, the operational speed achievable by the design (end-to-end in-service speed) is never identified even in the route option assessment (ROAR, chapter 10.2).
    - Can Table 10.5-10.6 (ROAR) really mean that the travel time saving is just 30 seconds per passenger trip in 2018, "rising" to 45 seconds by 2033, after a €250 million investment?
- In reality, this is a QBC improvement project, which addresses the many weaknesses of QBCs that should have been resolved years ago. Improved QBC is worthwhile, but it is not BRT and it does not justify this level of investment.
- The magnitude of cost is excessive for what is being delivered in terms of transportation capacity, speed, journey-time savings or passenger comfort.

    - The full cost of a BRT scheme is being incurred (€200-250 million), but the effective increase in capacity and performance is that of QBC enhancement (€30-50 million)
- The attention to cycling is excessive, and impedes the current and future capacity of the BRT. The route should be designated a public transport primary axis, cyclists should be directed to quieter parallel streets.
    - BRT is a significant mass transit investment. It has the potential to avoid the need to make a later investment of many billions in rail-based modes. The cycling strategy for the corridor needs to be adjusted in this light.
    - Achieving the long-term capacity for the BRT should not be compromised. When the BRT has been designed to achieve its full potential, cyclists can then be accommodated to the extent possible.
- To even consider allowing cyclists to share the BRT lane and impede the progress of BRT vehicles (ROAR, chapter 4.5) shows that this is not conceived or designed as a rapid transit system.

It is evident that this BRT is being designed by people who "think tram", and who think that a bus that looks and acts like a tram is the ideal solution. It does not come across that they have sufficient international experience of BRT.

3) Recommended interventions to improve the design process and outcomes

The current design process should be put on hold, on the basis of immediate implementation of the following:

- Commission an independent review by international experts of the design process and brief to date, and comparison of the current design to international practice and capacity in BRT
- NTA to make a clear statement of the transportation requirements for the corridor in the immediate, medium- and long-term (volume of travel, areas to be connected, connection to other transport elements). This could be the design requirements for Metro North, revised to account for changes in recent years.
- Revise the design brief to generate a feasible, unconstrained bus-based solution that fully meets the stated requirements, based on having the same implementation powers and commitment for rail or LRT.
- Establish a multi-party Steering Committee (or equivalent), to oversee the design brief, design phase and outcomes. This must include membership with extensive experience in BRT and urban bus operations.
- Develop a bus-based solution that meets the revised design brief. Ensure that the design team has extensive international experience in BRT.
- Develop a phased concept that can increase capacity and service offer in line with the anticipated growth in demand; identifying the infrastructure elements that must be implemented from the outset, and those that can be enhanced over time.
- Launch a further consultation that is based on a comprehensive concept, service and operational design, routing and quality parameters.

No doubt counter-arguments will be made on grounds such as "the detailed requirements were in other reports"; "we have examined that already"; "we have come too far now to turn back"; and "this will delay things and we need solutions urgently".

The obvious rejoinders are:

- If the scheme design process is wrong, the outcome will certainly be wrong
- If the scheme is not designed for the future requirements, it will be found wanting when the additional capacity is needed
- If the opportunity is spurned now to build for €300 million a scheme that meets the future requirements, we will be forced into solutions that cost €3+ billion
- If serious flaws are not acknowledged and rectified now, they will re-emerge in the planning application phase leading to rejection and redesign of the scheme, with even greater delay and wasted public money

The opportunity is available to improve the concept, the capacity and the value of Swiftway. It should be taken.

[redacted]

Brendan Finn is a transport consultant with extensive international experience in the organisation and operation of urban public transport, including BRT. This submission is made in a personal capacity as citizen, taxpayer, resident of Dublin and user of public transport. It does not seek to advance any commercial interest.

As should be clear from the above, the purpose of this submission is not to obstruct the BRT proposal but to strengthen it. Nevertheless, a point comes where the design and value are so limited and the missed opportunity so great that even advocates must shout "Stop!"

[redacted]

Comments:
I strongly object this planned scheme. This will hugely effect school picks and drop offs and will impact negatively on our lovely area by reducing walk ways, no parking & land grabbing. I do not support this and it can't happen.
The service that is currently provided is sufficient .

[redacted]

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

[redacted]

[redacted]

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[redacted]

[redacted]

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[redacted]

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ort.ie)

[redacted]

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[redacted]

[redacted]

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Comments:

Concern over terminus at Educate Together. High volume of traffic from both extra residential dwellings as well a BRT in an area where there is a high concentration of school children is a serious concern from a safety perspective.

Lack of parking facilities at these schools as well as for BRT (passengers from Swords Manor, Glasmore etc) will raise potential of cars being parked illegally in Burnaby Gate. This will cause a negative quality of life for residents as well as potential safety issues due to high volume of traffic.

Disruption to residents during development phase through a high density area will cause a serious negative quality of life

Reduction of boundary's in Burnaby Gate as well as other areas will impact aesthetics of estate as well as potential loss of re sale value of affected dwellings.

[redacted]

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Comments:

1. Enforcement of persons park + ride

2. Walls and surrounds to be finished to high standard
   – see as comparison
   Nil Donnybrook to Wicklow

[redacted]

Comments:
To whom it may concern,

Both my wife and I own our home at [redacted] Road.Our home is a 5 bedroom terraced residence We have looked at the plans published and note that the Authority are proposing to widen the road going past our home. This would entail reducing the size of our front garden area. We object to this reduction because of the following reasons

1) It would reduce our car parking from 5 cars to 3 cars
2) Reducing our front space would bring pedestrian and traffic closer to our home
3) Noise and vibration inside our home would increase because it would be closer
4) All of the above factors would have a negative impact to our quality of life
5) The above would greatly decrease the market value of our property.

[redacted]

From: Keith Gavin
Organisation: Irish Parking Association
Address: Unit 3, Barrowside Business Park, Sleaty Road, Carlow

Comments:
Dear Sir / Madam,
Please see attached the Irish Parking Association's submission in relation to the Public Consultation on Swiftway Bus Rapid Transit- Swords/Airport to City Centre.

Yours faithfully,

Keith Gavin
Irish Parking Association
Unit 3, Barrowside Business Park
Sleaty Road
Carlow
Tel: +353-59-9136886
Mob: 087-8113624
Fax: +353-59-9135185
email: info@parkingireland.ie
www.parkingireland.ie

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This e-mail was sent from a contact form on National Transport Authority (http://www.nationaltransport.ie)

[redacted]

[redacted]

ParkingIreland.ie
Irish Parking Association

National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

28th November 2014

Re: Public Consultation on Swiftway Bus Rapid Transit- Swords/Airport to City Centre

Dear Sir/Madam,

The Irish Parking Association (IPA), being the representative body for all interested stakeholders in the parking sector in Ireland, is opposed to this scheme, as currently proposed, for the following reasons:

- Dublin has a Georgian and Medieval Historic city centre and the fact is that the city centre can be easily walked. However, a number of factors, such as weak transport infrastructure, the sprawling nature of the city, poor planning enforcement, and inadequate footpaths for pedestrians detract from Dublin's strengths. BRT will further impede on the available footpath space.
- The number of streets that can take a BRT is limited.
- The bus was the most popular transport modal choice with 34% preferring its use to access the city centre, 20% of respondents favoured gaining access to the city centre by car according to Dublin City Council survey of Dubliner's opinions- 'Your City Your Voice' survey in 2012
- The proposed NTA route map is creating unprecedented problems for car-borne shoppers.
- The number of route changes and cessation of junctions is such that we have no confidence that car users will continue to use city centre. To give an example when the Busgate in College Green was introduced, a simple change, it caused a drop of 20% in car users coming into city centre according to Dublin City Council reports.
- Car parks accommodate 16-18 million cars annually. Car-borne shoppers may only come to city centre 5 or 6 times a year. The reality is that significant changes in between visits will break the visitors' habits which, once broken, may never be re-established.
- Infrequent visitors to Dublin e.g. for GAA matches, soccer matches, concerts in The 3 Arena or other venues in city centre will be impeded by restrictions in accessing the city.
- The current use of city centre car parks is down. Can the NTA justify the expected increased growth they are using in their proposal with factual data?
- The extent of no left/right turns for traffic as indicated requires a full overview of a city-wide route map to ensure car bound traffic can travel to all destinations.
- This is not a full consultation as promised as only one route is published and even that is subject to further development according to each drawing. Under EU Law more than one option is required in such a proposal as put forward by Swiftway
- To prepare a plan for BRT without fully considering other modes of transport, particularly cars, is simplistic in the extreme and unwise in the understanding of the outcome expected. There is no Traffic Plan for Dublin as part of the Swiftway proposal for Swords to City Centre.
- BRT is a significant disruption to the existing public transport system.
- BRT is considered suitable only for moderately used traffic corridors. In this proposal all routes are major arteries to the city and heavily used.
- BRT is a short-term solution at best and some research indicates it can be more expensive to operate than a light rail system.
- Is BRT value for money in the present climate?

Irish Parking Association, Unit 3, Barrowside Business Park, Sleaty Road, Carlow. *Co. Registration No. 222580*
Tel: (059) 9136886 Fax: (059) 9135185 Email: info@parkingireland.ie Web: www.parkingireland.ie

- The NTA has not shown the projected passenger load that will use this service. It is difficult to see the economic benefit and NTA's own 2012 report stated that a bigger system is needed. (Bus Rapid Transit Core Network Report 2012 – NTA – Page 72)
- The IPA welcomes public transport but the population in the whole of Ireland is 6.8 million people and they need to be serviced as well, and not only the 42,738 Swords urban area/68,000 Swords local area residents. (Ref. CSO Census 2011 figures).
- Any loss of access to the city centre will drastically affect trade and ultimately the level of rates that can be imposed. It is imperative that the NTA understands that most inward investment decisions for the city centre are made outside of Ireland and that Dublin City Centre is competing with Dundrum, Liffey Valley, Blanchardstown etc. for this investment.
- Have the NTA carried out an economic impact study on Dublin City Centre in light of the fact that Dublin City Council generates €65 million in rates in the prime retail core of Dublin 1 & 2.
- 90% of public transport will go through O'Connell Street.
- Previous experience with long buses ('bendy bus') was, at best, mixed.
- In comparison to light rail, BRT capacity is very low and not much ahead of the bus system.
- BRT is intended to operate for a significant part of the route in a fully dedicated rights of way corridor. Nowhere in this proposal is this evident.
- At no time is there any mention of the rights of private bus operators on that route and how this would affect them.
- If BRT is implemented, are taxis still allowed to use the Airport to city centre bus corridor?
- If BRT is to be implemented the public transport model needs to be changed to the European model.
- BRT systems operating in Europe service, in the main, outside city centre and operate as an ordinary bus service inside city centre.
- The BRT as proposed has a limited integration with other public transport modes. However, if BRT was to run to Bus Aras, there would be integration with other modes of public transport i.e. Luas, rail and Bus Éireann routes.
- This plan, as proposed, is an interim measure- why not look at a more long-term solution, e.g. DART Underground or other options and give existing bus services priority at traffic lights to decrease their journey time.

For the above reasons, and given the likely very negative impact on the operations of our members, we hope that you give serious consideration to these issues and that a review of the proposed scheme be carried out in advance of any implementation. We would be delighted for the opportunity to meet with you and discuss this matter further and to provide our input to this proposed scheme.

Keith Gavin

Keith Gavin
Chairman

Irish Parking Association, Unit 3, Barrowside Business Park, Sleaty Road, Carlow. *Co. Registration No. 222580*
Tel: (059) 9136886 Fax: (059) 9135185 Email: info@parkingireland.ie Web: www.parkingireland.ie

[redacted]

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Comments:

Property - Concerns of land acquisition
Corner of Shaw Road + Swords Road

Bus Stop @ Shaw Road - Can this be removed or relocated from junction

left turn from City Centre - out

Trees to be retained

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been trying for years to have Dublin Bus, Swords Express and Bus Eireann to include Knocksedan on their route without success. If BRT / swift way gets the go ahead Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops

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[redacted]

[redacted]

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[redacted]

[redacted]

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[redacted]

[redacted]

From: Brian Golden, Assistant Secretary, GPRA
Organisation: Gaeltacht Park Residents' Association (GPRA)
Address: c/o 26 Innishmaan Road, Whitehall, Dublin 9

Comments:
Please see attached file from representing the views of the GPRA Committee who represent our members in Gaeltacht Park and the adjoining houses on Swords Road.

All the best,

Brian

[redacted]

[redacted]

26 Innishmaan Road,
Whitehall,
Dublin 9.
[redacted]

Dublin City Council Civic Offices,
Wood Quay,
Dublin 8.

Re: Public Consultation on Swiftway – Bus Rapid Transit

Dear Sir/Madam,

Gaeltacht Park Residents' Association would like to make the following public submission reflecting the views of our 15-person Committee and our membership of over 200 households.

First and foremost, we would like to warmly welcome your overall proposal and the preferred route, which would deliver valuable and long overdue transport links between the airport, the city centre and Swords, for the city and its visitors and for our community. In addition, we welcome the provisions for two metre cycle lanes and two metre foot paths, the minimal construction involved and, in particular, the provisions for older and disabled people in terms of bus entrances level with bus stops.

We would like to raise the following issues in a constructive manner and would welcome further engagement.

A key concern of our members is the removal of the facility to turn right into Iveragh Road from the Swords Road when travelling south. We do not see how Swiftway necessitates the removal of this turn since there is no specific lane provided for turning that could be removed to make place for Swiftway. Access to our estate can be difficult in heavy traffic, which would be exacerbated by removing this facility. A particular problem would arise between 7 and 10 am when there is no right turn into our estate from Collins Avenue, when travelling east. This restriction is in place to prevent what had been a significant rat-running problem. The current proposal would mean anyone travelling by this route would have to undertake a long detour or a U-turn on very busy roads, to access our estate.

Observations we would also like to bring to your attention are:

- The Iveragh Road bus stop has much higher volumes of passengers than the Highfield hospital bus stop, which Swiftway proposes to utilise. This is particularly important in our area where there is a significant concentration of older people;

- Where a tree has to be uprooted, and we hope this is rare, we would ask that another tree be planted as close as is feasible to the original tree;

- We request a commitment that the overall bus service will be significantly improved. This is to assuage any concerns that Swiftway may see a significant degrading of existing services.

- We would also request a commitment that existing plans for public transport on the northside of the city remain on the table to be delivered. Even with Swiftway, the northside of the city will continue to

be at a disadvantage in terms of public transport relative to the city as a whole, and other comparable cities.

Please feel free to contact us in order to engage further on any of the issues that we raise and on any other issues that you would like to bring to our attention. We want to work with you so that your proposals achieve their full potential.

_____

Brian Golden, Assistant Secretary, on behalf of the GPRA Committee

[redacted]

From: Christopher Green, Green Party Press Officer
Organisation: Green Party
Address: 16/17 Suffolk Street, Dublin 2

Comments:
Dear Sir/Madam,

Please find attached the Green Party's contribution to the Swiftway BRT submission.

[redacted]

Chris.

Chris Green
Press Officer
press@greenparty.ie
+353 1 679 0012
+353 86 661 0972
Follow us @greenparty_ie

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[redacted]

Friday 28th November 2014

The Green Party
16/17 Suffolk Street
Dublin 2

Green Party Submission to National Transport Authority Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre

As a political party concerned with improving quality of life for all of Ireland's citizens through improvements in access to social services, quality sustainable housing, access to affordable and modern transport services, and a number of other issues, we are pleased to engage with the National Transport Authority (NTA) on the proposed Swiftway Bus Rapid Transit project.

The Green Party welcomes investment in public transport initiatives and believes that bus services for North Dublin require urgent attention to ameliorate a number of planning, capacity and infrastructure problems. The Green Party, however, remains sceptical of aspects of the Swiftway proposal, including its prioritisation over the Blanchardstown and Malahide Road routes, and fears that it amounts to an indefinite postponement of Metro North. In addition, we are unhappy with the currently proposed design of the project, given competing demands for road space from buses, cyclists and pedestrians.

The Green Party categorically rejects any assertion that Swiftway can replace the proposed Metro North rail project. It is clear that North Dublin is the desired location for increased house building in coming years, and the additional transport demands, adding to already evident public transport shortfalls, cannot be solved by an express bus service. Modern light rail is a proven technology and represents a significant but worthy investment in Dublin's transport future. BRT can only be an interim measure which complements a finalised Metro North.

Underinvestment in North Dublin's roads has led to a dilapidated road stock in several areas, and this requires urgent upgrades in many cases to satisfy the existing needs of car, bus and cycle users. If the introduction of BRT is to provide funding for the necessary upgrades then we would welcome this. However, if the intention is, as is suspected, to add a high-speed bus lane to an already crowded road network, without due regard for the need to provide improved infrastructure on much of the route, then the BRT project will create significantly more problems than it solves.

If the NTA decides to proceed with BRT, the Green Party considers it essential that existing junctions undergo upgrades in order to be cyclist and pedestrian 'proofed' and that the route, both in urban areas and along arterial roads, is designed in accordance with the *Design Manual for Urban Roads and Streets*, which is not the case at the moment. The NTA must also liaise with Dublin City Council's new Cycling Officer, and with other representatives of pedestrian and cyclist road users.

There are evident potential conflicts between cyclists and pedestrians given the high proportion of shared cycle and pedestrian lanes along many sections of the route, and there is currently a lack of detail on how the conflicting demands of cyclists and pedestrians will be managed in these areas. Similarly, the interaction of pedestrians and cyclists should be carefully considered where on-footpath cycle paths have been proposed. As clarified by the

UK's *Design Manual for Streets*, if cycle tracks are provided they should be physically segregated from footways/footpath (DoT, 2007: 6.4.8), primarily for reasons of safety.

The failure to provide a comprehensive network of cycle lanes is also of concern. Notable cases where cycle lanes are lacking along the proposed route include southbound on the Swords Road outside the Omni Park shopping centre, and northbound on Westland Row. We are concerned that cyclists may opt to use BRT lanes without adequate, dedicated infrastructure of their own.

The *National Cycle Manual* comments explicitly on potential conflicts between the provision of bus routes and cycling infrastructure stating that, "Where the only option is shared road space, the infrastructure should be designed and delivered as being for both modes (and other permitted vehicles) with primacy being given to the safety of cyclists." (http://www.cyclemanual.ie/manual/legislation-and-policy/irish-cycling-policy/)

A further area of concern relates to the layout of bus stops. Excluding the city centre (maps for City Centre/O'Connell St, City Centre South/Pearse St. and Merrion Square/Stephen's Green) in-line bus stops are primarily recommended. These require pedestrians and cyclists to share space. This, again, is contrary to the guidance provided in the *National Cycle Manual,* whereby in-line bus stops are only appropriate in areas of low traffic volume, relating to cyclists, buses and pedestrians, specifically where there are ten minute intervals between bus services. It would be more appropriate to use island-type or floating bus stops throughout, rather than only in the city centre.

Junction layout is potentially problematic for cyclists in some cases, especially where crossing right across traffic. One example is the Swords Road/Coolock Lane junction where there is no provision for cyclists continuing south. Providing for cyclists at multi-lane right turns is problematic. The use of box-turns could be considered. This would require stacking zones and secondary signals.

As highlighted by the *National Cycle Manual*, cycling provision requires careful and proactive planning and it is "not acceptable to simply provide whatever space is left over after traffic has been catered for – this approach often results in facilities that are substandard and unsafe for cyclists. Substandard facilities have been shown to be dangerous, increasing the likelihood and severity of conflict. It would be better not to provide any cycling facility at all, and to review the overall cycle network." (www.cyclemanual.ie/manual/designing/linktypes/)

There is also an apparent failure to adequately cater for pedestrians. Outside the city centre, a footpath width of 2 metres has been recommended. This is insufficient given high pedestrian volumes in some areas, the centre of Drumcondra being a pertinent example. According to the *Design Manual for Urban Streets and Roads*, 3 metres is the minimum acceptable footpath width for 'neighbourhood' areas of moderate to high pedestrian activity. Sect. 4.3.1 continues that in such instance of retrofitting "increasing footpath widths should be a priority."

Furthermore, the proposed development fails to contribute to, and indeed reduces, available green space along the route in terms of the number of street trees and verges. In cases of retrofitting, the provision of street trees and additional verges are recommended (*Design Manual for Urban Streets and Roads*, 3.4.5) as they contribute to a sense of place and also

mitigate the noise and visual intrusion that large-scale public transport projects frequently entail.

Overall, while the necessity of new public transport links for North Dublin is self evident, it is entirely unwise to design and build transport infrastructure at the expense of public safety and the convenience of those who walk and/or cycle.

In conclusion, the Green Party and its representatives in North and Inner City Dublin are not currently satisfied that the BRT proposal answers questions about the suitability of the project to meet the needs of a diverse community of road users, and we remain concerned that the Metro North rail project will be sidelined if the BRT scheme is progressed. We would welcome a revised proposal from the NTA which addresses these concerns.

ENDS

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:11
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 10 November 2014 22:53
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
This Proposal will only succeed if there is a localised bus service in the swords area……. As things stand people will not walk from 5to25 mins. to get to a bus stop in all weathers, because of a fragmented and disjointed Dublin bus service. save your 200 million euro. run one bus service every 5 mins. from the city centre to swords main street 25/30 mins. journey time…. backed up by a localised bus service covering the whole of swords, which passes through swords main street at regular intervals to connect for journeys to or from the city centre… in addition all commuters to donebate, skerries and balbriggan would all change at swords for onward journeys. Duplication of the current bus routes,33 / 41 / 41a /41b / 41c from city centre to swords are totally unecomomical.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:54
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Swiftway_Submission.pdf

[redacted]

Comments:
I am in favour of the proposed Swiftway service, but would just like to make a few suggestions. Please see attached file. Thank you for your consideration.

--
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[redacted]

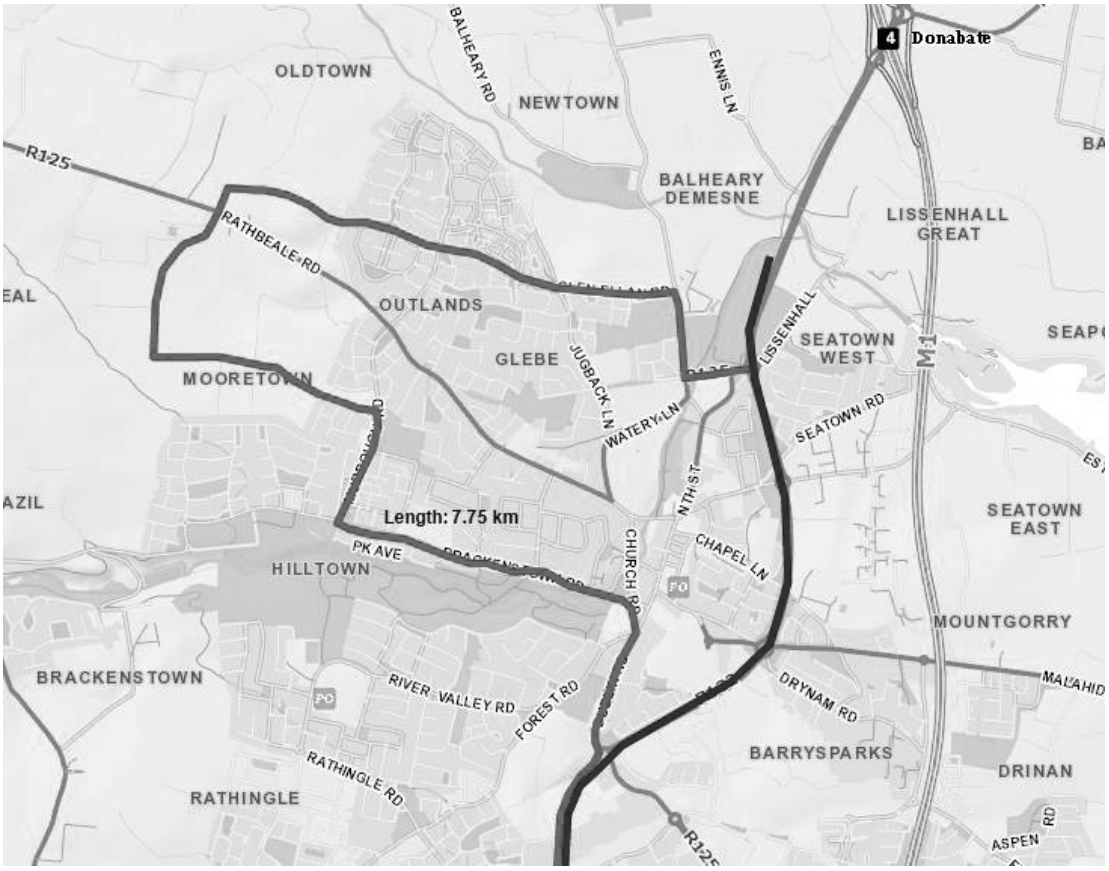
Route through north-west Swords

I am in support of the idea of routing Swiftway into the Oldtown area, because I believe it should make this area more attractive and encourage the early development of the area. However, the section along the Glen Ellan Road Extension through Oldtown should be planned carefully. This road is planned to be a main street for the new neighbourhood in Oldtown, and according to the Oldtown Mooretown LAP: "The main streets front onto the Local Centres and will be designed as slow speed pedestrian friendly streets. A carriageway width of 6m max will be required to accommodate traffic." You need to make sure that widening this road will not turn it into a main road and damage its plans as a "main street". I have noticed that your plans do not include the raised tables at junctions, which were part of the recent planning applications made for these areas. While I can understand that this is to accommodate the BRT vehicles, you should consider putting speed cushions on the car lanes, to slow traffic down and prevent this from becoming a car friendly main road, rather than the pedestrian-friendly main street it should be.

The Swiftway route should be extended from Oldtown to Mooretown, when this area starts to develop. While I am aware that this is part of the eventual plans, due to the fact that Swiftway will take two and a half years to build, development might have already started in Mooretown by the time Swiftway is open. As far as I am aware, the Department of Education intend to open a new school on the site in Mooretown in September 2016. The Oldtown-Mooretown LAP also states that the first phase of development must include parts of both Oldtown and Mooretown, while the second phase of development will take place entirely within Mooretown. It might be better to include the extension to Mooretown as part of the initial planning application, so that this extension can be facilitated quickly if it is required. It might make more sense to start the service with Mooretown as its terminus, rather than constructing a temporary terminus at Oldtown.

In addition to this, provision should also be made for a possible future connection from Mooretown through Lioscian to Murrough Road. The Oldtown-Mooretown LAP proposed that a Swords Western QBC would be provided from the LAP lands along Murrough Road, Brackenstown Road and Dublin Road to the existing Swords QBC. When Metro North is completed it might be more desirable to reroute Swiftway through Swords, rather than keeping it on the same route as the metro. This connection could allow for Swiftway to run in the reverse direction, starting at the Estuary metro stop and running through Applewood, Oldtown, Mooretown, Lioscian, then following the Swords Western QBC route to the Dublin Road, where it would join back onto the existing proposed route. This would also allow for an interchange with Metro at either end of the route through Swords, and would allow the Swiftway service to act as a feeder to the Metro.

Possible route of Swiftway following the opening of Metro North (Swiftway in red, Metro in blue)



Route along R132 Swords Bypass

The section of the route along the R132 Swords Bypass should be constructed very carefully to ensure it will not become a future barrier to the construction of Metro North, which is planned to run along the same alignment. The BRT lanes along the centre of the dual carriageway must be built wide enough to allow for the Metro North line to be easily constructed here, without necessitating the entire reconstruction of the road. A wider median should also be provided at locations where metro stops are proposed to be located. While the R132 is being reconstructed for Swiftway, all enabling works for Metro North, such as the diversion of any utilities, should be carried out, to future proof this alignment for Metro North.

Ideally, the entire alignment of the Metro North line should be constructed between the Estuary and Fosterstown stops, without the railway tracks, allowing Swiftway to use it until it is required for Metro North. I understand that this would be costly to do, however it is only a short section of the overall Metro North route, and it will reduce the eventual costs of Metro North. This option should be made available to the government when looking for funding, because Metro North is only a deferred project, not cancelled. While the government may not be willing to provide funding for the entire Metro North project at this stage, they might be willing to provide funding for a short section of it, due to the fact that it will save them money in the long term.

You should also reconsider the pedestrian crossing access to the proposed stops along the R132 Swords Bypass, due to the fact that this was not considered acceptable by An Bord Pleanála in the previous Metro North railway order application.

River Valley Connections

I would like some clarification on how the River Valley area is going to be served from Swiftway. The location of the Airside stop on the northern side of the R132 Airside/Boroimhe junction makes it difficult for passenger to change buses and connect into River Valley. At present, bus services through River Valley continue through Boroimhe, then turn south onto the R132, where the next Swiftway stop is not until Dublin Airport. If a feeder service was to run from River Valley through Boroimhe, then turn north onto the R132 to connect with the Airside stop, then passengers would have to cross the road to get to the city-bound stop. Similarly, they would again have to cross the road to connect from a Swiftway service from the city to a feeder service to River Valley. Please give more details about this in your planning application.

Cloghran Future Stop

The proposed future stop at Cloghran is located within the safety zone of Dublin Airports proposed northern runway. This is also a green belt separating Swords from the airport, so development is unlikely to ever take place at this location. However, this stop is adjacent to the National Show Centre and could be very useful at times when large exhibitions are being held here. Opening this stop for exhibitions only should be considered.

Road space in City Centre

The proposed scheme appears to show the removal of a large amount of road space within the city centre, particularly around Westmoreland Street and D'Olier Street, which are used by a huge amount of bus services. The removal of this road space, along with space being taken for Luas Cross City will have a huge effect of bus services through this area. I will be very interested in seeing a traffic management report as part of your planning application, and I would particularly like to see what bus services you intend to reroute and where you plan to reroute them through.

Naming of Stops

I would suggest changing the name of the Applewood stop to "Castleview" and the Jugback Lane stop to "Applewood". This is because the Jugback Lane stop is closer and more convenient for Applewood Village, and passengers from Applewood / Glen Ellan are most likely to use this stop.

I would also suggest changing the Swords North and Swords South stops to "Seatown" and "Pinnockhill" respectively. Neither of these stops are located in the north or south of Swords and would all generally be considered to be in the centre of the town. Seatown and Pinnockhill are the names of the adjacent roundabouts, and these names are also well known locally. The Swords Central stop should be just called "Swords", to prevent confusion with the Swords Central Shopping Centre.

You could also consider renaming the Airside stop to “Fosterstown”, because this stop would serve the Fosterstown LAP area and associating this stop with this area through its name could help to encourage the development of the area.

Hierarchy of Transport Services

Swiftway needs to be branded as a higher quality bus service and should be promoted more like a Luas service. Swiftway should be marked on public transport maps as a service alongside Luas and DART.

However, Swiftway should not be promoted as the only high quality bus service in Dublin. The introduction of Swiftway should be used as an opportunity to create a hierarchy of bus services within Dublin. At present, the most high frequency Dublin Bus routes are indistinguishable from other services, particularly with their non-memorable route numbers such as 39a, 46a and 145. These high frequency services should be renumbered using a memorable system (e.g. 1,2,3 or 10,20,30) and should be branded as high frequency services which passengers do not need to check a timetable for. For example, Belfast’s Metro Bus network consists of over 100 routes, but there are 12 core routes (numbered 1-12) which operate every 5-10 mins. This makes it very easy for people who are not regular users and are not familiar with services to use it. While Dublin has a large number of high frequency routes, they are not easily found. The large number of routes, with no clear hierarchy, makes the Dublin Bus network very difficult to understand for people who are not regular users, including tourists.

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 17:06
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Swiftway_Stayaway_-_Proforma_letter_of_objection_-_Final_2.docx

From: Lynne Hartigan
Organisation: Glenellan residents assoc.
Address: 13 Glenellan walk words Co. Dublin

Comments:

--
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To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

Upload this file To NTA Website at the following link:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

Closing date for submissions is Friday 28th November at 5pm

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 25 November 2014 09:11
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Dear Sirs, I wish to make a submission in regards to the proposed Swiftway / BRT route outside Swords Educate Together School in Applewood, Swords. Our children attend this school, and there were few Educate Together Schools to choose from. Living in Portmarnock and being in School in Swords, the only conceivable way of getting to school is by car, and this requires us to drive to Swords and then park our car on the road outside the school for drop off between 08:10 and 08:40 (school starts 08:30) and then again between 13:45 and 14:20 for pick up at the end of the day. Parking is already very restricted with the Irish school and another ETNS located in Applewood village. Schools have helped by staggering start times, but I understand that with the Swiftway, parking along this route will be revoked. There will be no where to park to our children off for school unless we start to park in neighbouring estates (which will not be welcomed) and then children will need to walk along what will become a very busy road with Swiftway, through traffic and new housing estate. This is not a well thought out plan. If Swiftway is to go along this route, provision needs to to be considered for additional parking for the 2 schools to allow safe drop-off and pick up.
Housing has not yet been developed opposite the schools, so there is plenty of time to incorporate suitable parking, preferable by diverting the Swiftway route onto open ground opposite the schools and existing road and leaving the current road untouched.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:58
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
The proposed scheme is fundamentally flawed. The only people to benefit are the Consultants and contractors involved in the construction of the various bus lanes / dedicated routes. Journeys for existing users will be no faster, especially compared with "express" options which run non-stop between Swords and Dublin. Bus stops will be further from peoples homes and this might discourage the use of public transport altogether. The vehicles proposed, the so-called "bendybusses" have been introduced previously in London, Dublin and Malta and had to be withdrawn because they were a disaster. One of the key issues in Boris Johnson's campaign to be Mayor of London was a commitment to withdraw all such buses. Other road users will be adversely impacted by construction works. Does the NTA want to be the next Irish Water?

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:19
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
I welcome greater focus on public transport along this busy and important transport corridor. I am totally in favour of better public transport on this corridor. However, I am concerned that the unless adequate priority and segregation is given to the Swiftway that the journey time reduction will not be sufficient to justify the capital cost and will not be enough to result in mode shift from car to public transport.
Any investment will have to result in dramatically reduced journey times and also be of sufficient scale to allow for future higher density housing developments in north Dublin. Metro North addresses these issues.

With regard to the proposed route the right turn ban from the Swords Road onto Iveragh Road may cause further delays at the junction with Collins Avenue and on Collins Avenue itself.
Also, the footpath on the southbound side of the Swords Road heading towards Highfield Hospital is already very narrow, if the project proceeds – this footpath should be widened as part of the overall realignment.

Currently, traffic on the southbound route on the Swords Road turning left onto Collins Avenue cause significant delays to buses in the bus lane, as cars enter the bus lane to turn onto Collins avenue (at the bottom of Holy Child church carpark) and then cannot get through the junction. This can result in buses missing a number of light changes.
Additionally, traffic heading West on Collins avenue turning to the southbound lane of the Swords Road end up sitting across the bus lane further blocking buses.
As an interim measure could traffic light signals and other low cost engineering measures be put in place reduce the number of these needless delays to buses?

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 20:56
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
I object to this bus service as it does nothing for swords and will cause 2 or 3 years of dealys for me. Also it will take away the green are in front of my house which yous will put a bus stop there and I'm not happy about it. The eta to city center is slower than swords express which is the best bus service anybody could have its a pity they don't take the hole route of dublin bus!

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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:54
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: 141128_Bovale_Developent_Submission_BRT_Swords_City_Centre.pdf

From: Michael Higgins
Organisation: ILTP Consulting
Address: St. Albert's House, Dunboyne, Co. Meath

Comments:
Dear Sir / Madam,

ILTP Consulting have been requested by Bovale Developments to undertake an analysis of the proposed BRT and prepare a submission to the National Transport Authority (NTA), BRT Preferred Route for the Swords / Airport to City Centre Corridor.

Please find attached submission on behalf of Bovale Developments on the BRT Preferred Route for the Swords / Airport to City Centre Corridor.

Can you please confirm receipt of submission and if you have any query please contact me.

Regards,

Mike Higgins

--
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0426b

Submission to NTA Bus Rapid Transit – Preferred Route Swords / Dublin Airport to City Centre Corridor

Client: Bovale Developments

Bovale Developments
Submission

ILTP
consulting

SUBMISSION TO NTA BUS RAPID TRANSIT – PREFERRED ROUTE SWORDS / AIRPORT TO CITY CENTRE CORRIDOR

Description:

NTA Submission

Author:

Michael Higgins

Ben Waite

Approved By:

Christy O'Sullivan

28 November 2014

Distribution:

National Transport Authority

Bovale Developments

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ILTP
consulting

SUBMISSION TO NTA SWORDS / AIRPORT TO CITY CENTRE PREFRERRED ROUTE BUS RAPID TRANSIT

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St. Albert's House Dunboyne Co. Meath
tel: 01-8255700 fax: 01-8255730

1 INTRODUCTION

1.1 Purpose of Report

1.1.1 The NTA launched a public consultation on proposals for the BRT Preferred Route for the Swords / Airport to City Centre Corridor in October 2014.

1.1.2 ILTP Consulting have been requested by Bovale Developments to undertake an analysis of the proposed BRT and prepare a submission to the National Transport Authority (NTA), BRT Preferred Route for the Swords / Airport to City Centre Corridor.

1.1.3 Bovale Developments have a significant landholding adjacent to the proposed BRT on the R132 in Swords. This land is zoned and much of the lands are within the *Barrysparks Local Area Plan 2011* (LAP).

1.1.4 Access to the lands is currently via the R132 and off Drynam Road in the north and the recently constructed Holywell Distributor Road to the south.

1.1.5 The analysis undertaken by ILTP identified a number of areas of concern for our client, particularly pertaining to accessing the subject lands. The concerns and steps that would address the issues are set out below.

1.2 Background to Submission

1.2.1 ILTP previously made a submission to the NTA on the 'emerging preferred route' for the Swords / Airport to City Centre BRT on behalf of Bovale Development in March 2014. The earlier submission stated with regard to Bovale Development lands in Barrrysparks that:

> *"In relation to the lands at Barrysparks, a LAP for the lands has been adopted and Bovale believe that the Barrysparks lands at Swords Town Centre should be developed in advance or in tandem with the BRT and/or Metro North in order to maximise patronage of these high capacity public transport links."*

1.2.2 It remains the view of Bovale that the development of the Barrysparks lands should be developed in advance of, or in tandem with, the development of the BRT and that the BRT should not hinder the development of these strategic zoned lands.

1.3 Format of Submission

1.3.1 Chapter 2 describes the existing access arrangements to the land and the planning context.

1.3.2 Chapter 3 outlines the BRT scheme proposals in the vicinity and analyses the impact of these proposals on the Barrysparks lands.

1.3.3 Chapter 4 outlines proposed modifications to the BRT scheme particularly pertaining to the accessing of the Barrysparks lands.

1.3.4 A summary and conclusion are provided in Chapter 5.

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2 SWORDS POLICY AND DEVELOPMENT OVERVIEW

2.1 Introduction

2.1.1 Bovale Developments has a number of landholdings adjacent to or in the general vicinity of the Swords / Airport to City Centre Corridor. One of these landholdings is in Barrysparks, Swords as shown in Figure 2.1.

2.1.2 This landholding encompasses almost all of the Barrysparks LAP lands and a considerable area of adjacent zoned lands to the south of the LAP Lands that our Client may wish to bring forward for development.

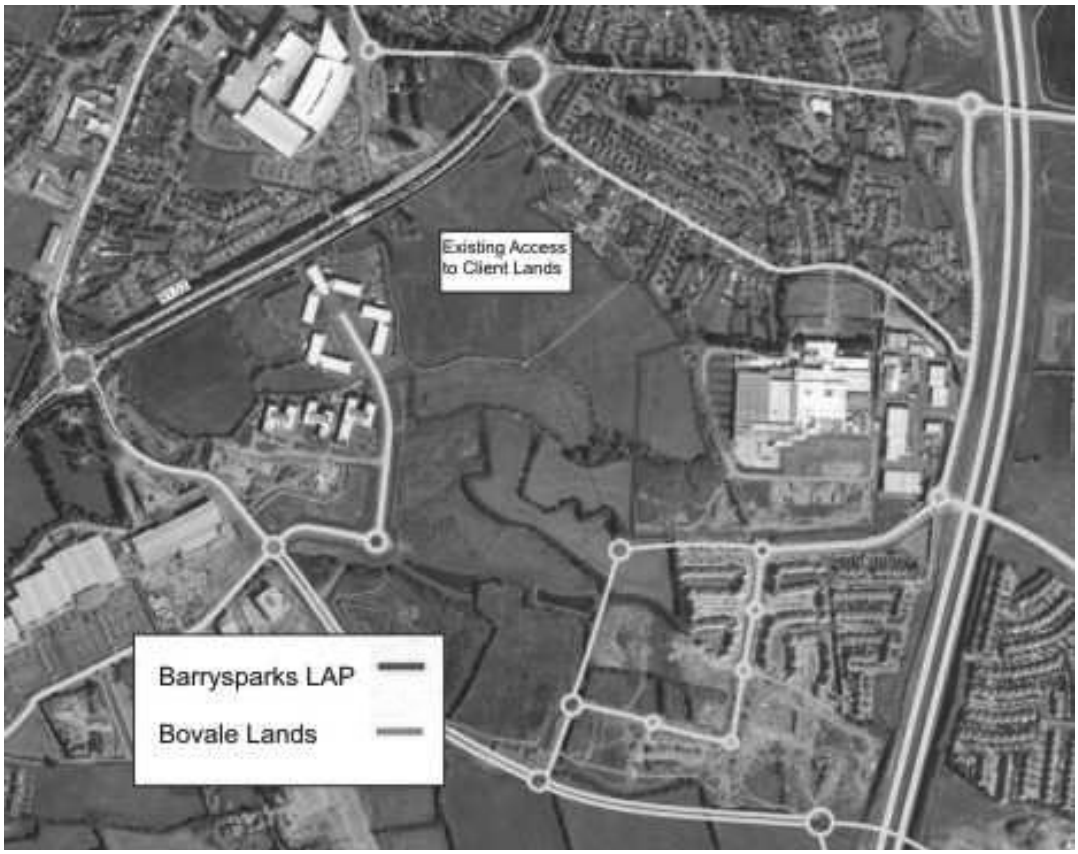

Figure 2.1: Barrysparks Lands, Swords

2.1.3 The lands are currently accessed via the R132 and off Drynam Road in the north and off the Holywell Distributor Road in the south. The location of these accesses is shown in Figure 2.1.

2.1.4 The importance of the lands in facilitating the sustainable growth of Swords has been recognised in regional and local planning policy.

2.2 Barrysparks Local Area Plan

2.2.1 The *Barrysparks Local Area Plan* was adopted in July 2011 to facilitate the sustainable development of the Barrysparks lands as an integral part of Swords town centre. The Barrysparks LAP provides for the orderly development of the Barrysparks lands and the Barrysparks LAP Map is shown in Figure 2.2.

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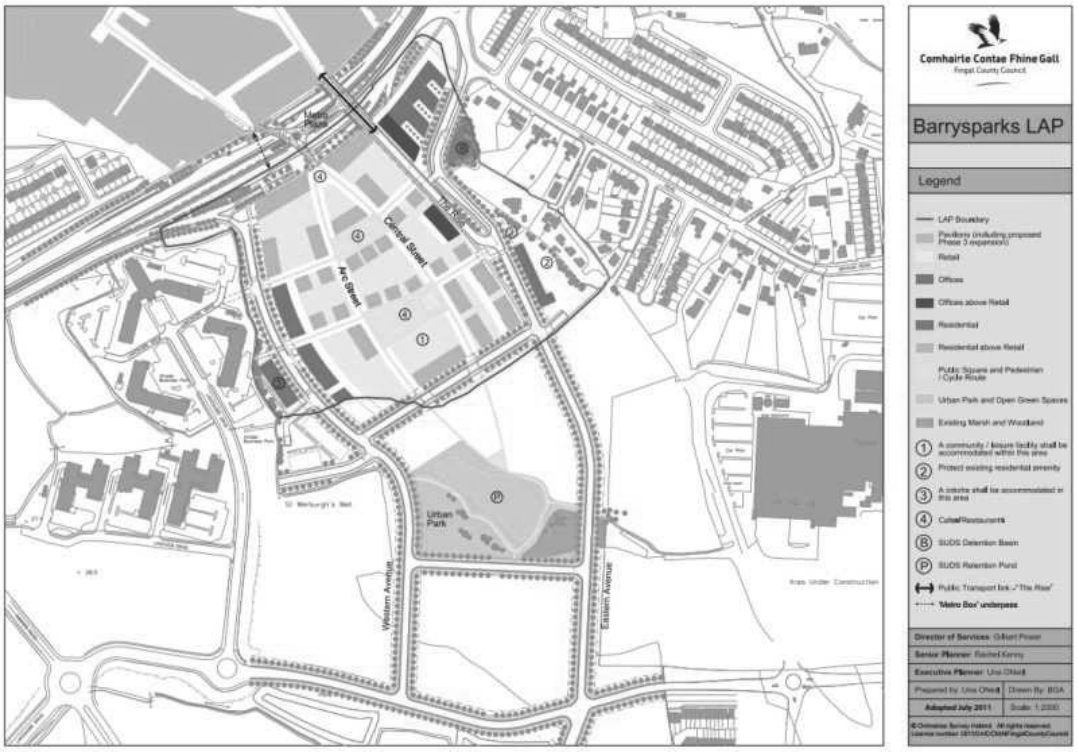

Figure 2.2: Barrysparks Lap Map (Source: FCC)

2.2.2 The first Strategic Objective in the Barrysparks LAP is to:

> *"Contribute to the consolidated development and expansion of Swords town centre, through the creation of a new high-density urban quarter, maximising upon the LAP's town centre location and proximity to planned Swords Metro Stop."*

2.2.3 The importance of the Barrysparks LAP lands and the wider subject landholding to facilitate the development of Swords means that it is crucial that any BRT proposals do not hinder the development of Barrysparks.

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3 OUTLINE AND ANALYSIS OF NTA PROPOSALS – SWORDS TO CITY CENTRE PREFERRED ROUTE

3.1 Introduction

3.1.1 In October 2014 the NTA launched a public consultation on proposals for the BRT Preferred Route for the Swords / Airport to City Centre Corridor.

3.1.2 The route serves Swords and is routed on the R132 adjacent to the Pavilions SC and the Barrysparks LAP lands.

3.1.3 The Swords / Airport to City Centre BRT *Route Options Assessment Report* acknowledge the necessity to accommodate the development of lands to the south of the R132 and Barrysparks and states:

> *"The on-line R132 stop adjacent to the Swords Pavilions needs to take cognisance of existing road and access layouts….and the Swords Town Centre Masperplan proposals for lands to the east and west of the R132 at this location (including Barrysparks LAP)."*

3.1.4 The preferred route drawings provide the first opportunity for our Client to view in any detail the proposed arrangements in the vicinity of the Barrysparks lands and the BRT proposed arrangements are shown in Figure 3.1.

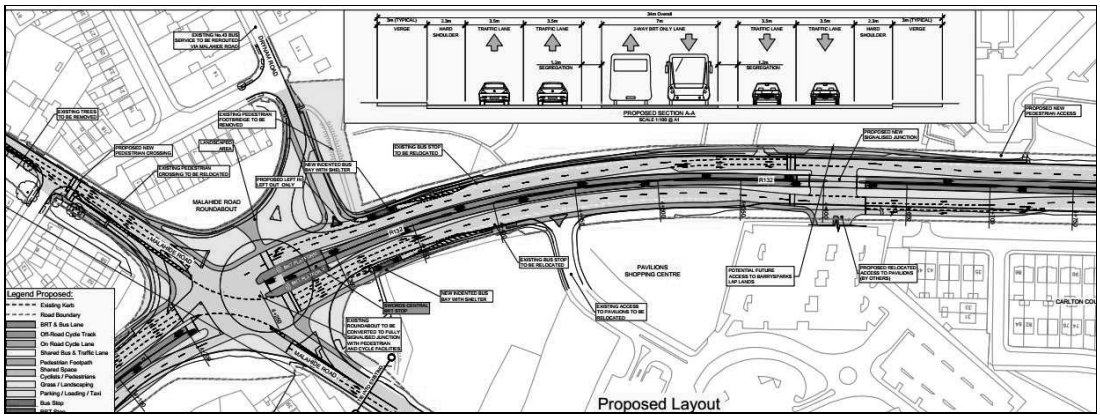

Figure 3.1: NTA Proposed BRT adjacent to Barrysparks Lands

3.1.5 The NTA drawings do not provide for accessing Barrysparks LAP.

- The proposed BRT completely removes an existing all movement access to the Barrysparks LAP lands via Drynam Road off the Malahide Roundabout.
- No access from the R132 is provided. Annotation on the drawing states "*Potential Future Access to Barrysparks LAP lands*" opposite the proposed Pavilions access relocation.

3.1.6 The existing left in left out Pavilions SC access is to be relocated to the south. The annotation with regard to the relocated entrance states *"Proposed relocated access to Pavilions (By Others)"*.

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3.1.7 The BRT proposals also provide for the removal of the pedestrian overbridge adjacent to the Malahide Road Roundabout.

3.1.8 The Malahide Roundabout is replaced by a signalised junction which, in addition to accommodating existing traffic, is to facilitate the proposed BRT. The removal of the roundabout will also remove a U-turn movement on the R132 which is currently used by traffic exiting the Pavilions SC.

3.1.9 The existing Bus Lanes located on the outside lanes of the carriage are proposed to be removed and replaced by BRT & Bus lane in the median area.

3.2 Analysis of NTA Proposals R132 Access

3.2.1 The omission of access to the Barrysparks LAP lands in the proposed BRT scheme from the R132 is not in line with Local Planning Policy and has a number of negative impacts which cannot simply be addressed by the provision of an access at a later time.

3.2.2 The retro-fitting of an access after the construction of the BRT will add significantly to the cost of the provision of such an access.

3.2.3 The proposal that a possible future access may be provided at the location of the proposed Pavilions access will further add to the cost of a retro-fitting of an access and increase uncertainty as regards to access to our Client's lands.

3.2.4 The linking of the Barrysparks LAP with the proposed Pavilions entrance unnecessarily complicates the provision of the Barrysparks access as it is unclear if the proposed Pavilions entrance is consistent with an existent planning permission for the Pavilions Shopping Centre or who will be responsible for the provision of this new Pavilions entrance.

3.3 Proposed Access off Drynam Road

3.3.1 The proposed BRT scheme removes the existing access to the lands from Drynam Road. Currently the Barrysparks Lands can be accessed off the Drynam Road which links to the Malahide Road Roundabout. This existing access is included in the Barrysparks LAP Road Network.

3.3.2 The proposed BRT scheme layout will re-align Drynam Road adjacent to the R132. The BRT Scheme proposes to replace the Malahide Road Roundabout with a signalised junction and a left in left out Drynam Road / R132 junction is proposed.

3.3.3 It is further proposed that the existing access off the Drynam Road to the Barryspark LAP lands is removed and the access is replaced with grass and landscaping.

3.3.4 The proposed BRT completely removes the existing all movement access to the Barrysparks LAP lands via Drynam Road off the Malahide Roundabout.

3.3.5 The BRT Scheme proposals are contrary to the *Barrysparks LAP* and will impact significantly on access to / from the Barrysparks lands.

3.4 Post Construction Management of BRT Carriageway and Services

3.4.1 Arrangements for the post construction management of the BRT line have not been set out. Issues which have not been clarified include:

- Ownership of the BRT network post construction
- Access on/off roadways on which the BRT is routed

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- The use of BRT by private buses
- The use of BRT by taxis
- The management of traffic signals including SCATS
- No funding for the proposed BRT scheme is currently in place

3.5 Transport Study Greater Swords Area

3.5.1 ILTP Consulting have been informed by Fingal County Council that a transport study of the Greater Swords Area is underway. This study will improve greatly our understanding of existing and future travel demands and patterns.

3.5.2 Our Client has not had an opportunity to review this document and such an opportunity would be welcomed by our Client and allow for a more informed engagement on transport proposals and future development in Swords.

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4 PROPOSED MODIFICATIONS TO BRT PROPOSALS

4.1 Introduction

4.1.1 In view of the omission of appropriate access provision from the R132 and Drynam Road to the Barrysparks Lands a number of modifications to the proposed BRT scheme are outlined below.

4.2 Proposed Access Modifications

4.2.1 The development of the Barrysparks lands in line with adopted planning scheme relies upon appropriate, deliverable access arrangements being provided. The proposed BRT must facilitate the provision of these accesses.

4.2.2 As a minimum an all movement access junction off the R132 is required. Such a junction must be located at such a point as to accommodate an all movement junction on lands in the ownership of Bovale Developments.

4.2.3 Access to the Barrysparks lands is currently provided off Drynam Road. The provision of such an access is included in the *Barrysparks LAP.*

4.2.4 Access off Drynam Road to the Barrysparks lands should continue to be provided. The NTA BRT drawings should include a two way all movement access from the Barrysparks lands to the Drynam Road.

4.2.5 Proposed modification to the BRT network incorporating the Drynam Road access are also shown in Figures 4.1 and 4.3 below. Option 1 providing an all movement access at the central location, is the preferred option. Option 2 provides an all movement junction further south.

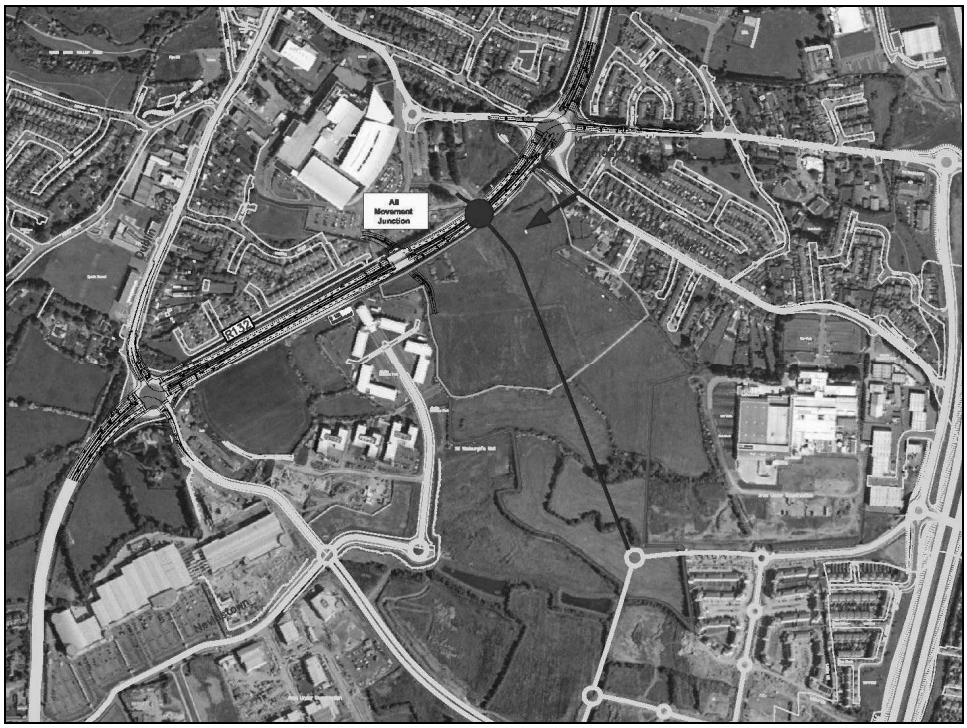

Figure 4.1: Option 1 – Preferred Access to Barrysparks Lands off R132 and Drynam Road

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4.2.6 Option 1 provides an all movement access off the R132 at the location of the existing Pavilions SC entrance and an all movement junction off Drynam Road. The Drynam Road junction with the R132 is a left in left out arrangement.

4.2.7 A roadway through the Barryparks lands will link with the newly constructed roundabout on the Holywell Distributor Road in the south of our Client's lands.

4.2.8 A preliminary design of the proposed R132 junction preferred option is shown in Figure 4.2.

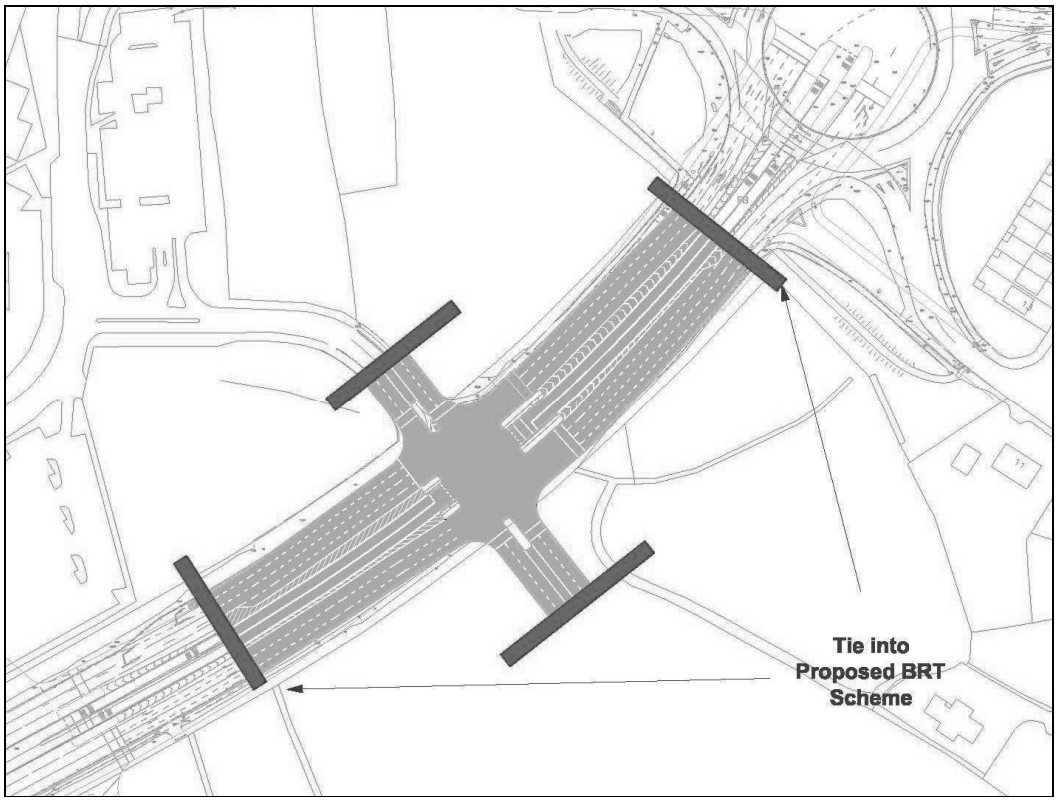

Figure 4.2: Preliminary Design R132 All Movement Junction Preferred Option

4.2.9 It can be seen that the junction provides for all movements into and out of the Pavilions SC and Barrysparks.

4.2.10 The lane arrangements are in line with that proposed in the BRT scheme and, in addition, pedestrian and bicycle facilities are consistent with the proposed BRT scheme.

4.2.11 Option 2, shown in Figure 4.3, provides an all movement access off the R132 to the south of Option 1 at a location similar to the BRT scheme proposed relocated Pavilions SC access. Option 2 will also provide an all movement junction off Drynam Road. The Drynam Road junction with the R132 is a left in left out arrangement.

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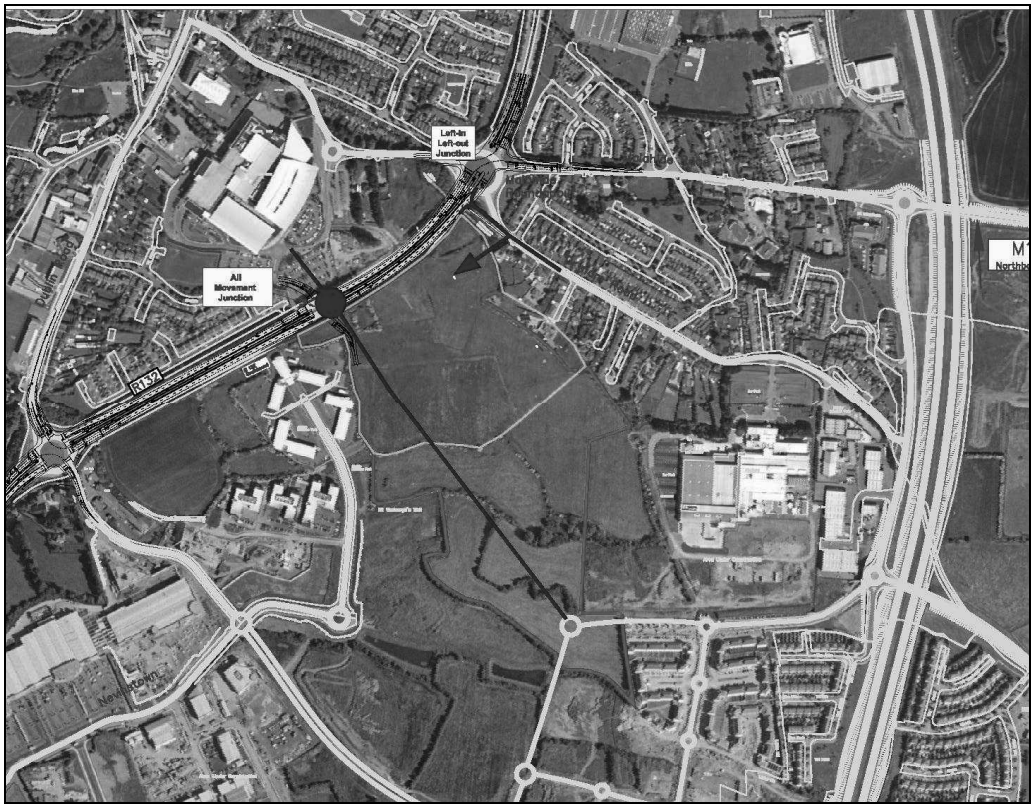

Figure 4.3: Option 2 – Alternative Access to Barrysparks Lands off R132 and Drynam Road

4.2.12 A roadway through the Barryparks lands will link with the newly constructed roundabout on the Holywell Distributor Road in the south of our Client's lands.

4.2.13 A preliminary design of the proposed R132 junction alternative option is shown in Figure 4.4. It can be seen that the junction provides for all movements into and out of the Pavilions SC and Barrysparks.

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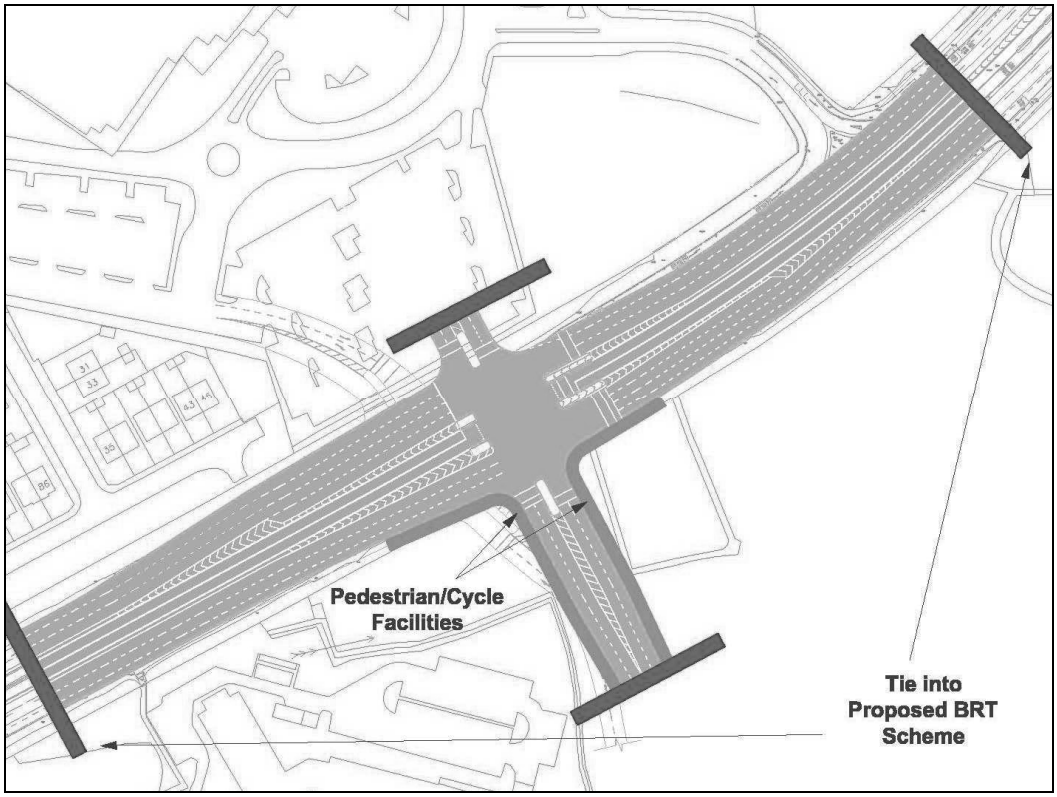

Figure 4.4: Preliminary Design R132 All Movement Junction Alternative Option

4.2.14 The lane arrangements are in line with that proposed in the BRT scheme. Pedestrian and bicycle facilities are included in this layout to ensure such facilities can be provided within client lands.

4.2.15 Access to the Barrysparks lands should be delivered in advance of or in tandem with the BRT scheme and the BRT proposals should facilitate this.

4.2.16 Clarification should also be provided on the ownership and management of the BRT network and services prior to progressing the proposed BRT scheme any further.

4.2.17 Our Client would like an opportunity to review the FCC / NTA Transport Study for the Greater Swords Area in advance of the proposed BRT Scheme progressing.

4.2.18 The uncertainty regarding the management and ownership of the BRT scheme and the lack of opportunity to review the Transport Study for the Greater Swords Area mean that additional items of concern may arise in future consultation and engagement on the BRT proposals.

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5 SUMMARY & CONCLUSIONS

5.1 Summary

5.1.1 This submission has been prepared by ILTP Consulting on behalf of Bovale Developments, the owners of lands at Barrysparks, County Dublin. The landholding includes lands within the Barrysparks LAP and adjacent zoned lands.

5.1.2 In order to support the growth of Swords the development of the Barrysparks lands and the integration of the lands with the existing town centre has been recognised in Local Planning Policy documents.

5.1.3 Local Planning Policy makes clear that the development of the Barrysparks land will include high quality links to the lands from the R132 and linkages with the existing Swords Town Centre north of the R132.

5.1.4 The current BRT proposals do not facilitate the development of the Barrysparks lands as the proposed access arrangements are wholly inadequate.

- The BRT scheme proposes that the existing Drynam Road access be closed
- The BRT scheme proposes only the location of a *'possible future access'* off the R132 to the Barrysparks lands.

5.1.5 The proposed BRT access arrangements to the Barrysparks lands should be modified to provide for:

- The accessing of the lands from the R132 via an all movement junction
- Access to and from the lands via Drynam Road.

5.1.6 The preferred option for the proposed location and provision of an all movement junction on the R132 and access of Drynam Road is shown in Figure 4.1. An alternative arrangement is shown in Figure 4.2. The provision of either of these access arrangements in advance of, or in tandem with, the BRT should be allowed for in the BRT scheme.

5.2 Conclusion

5.2.1 In order to support the development of Swords in line with Regional and local planning policy the preferred route for the Swords / Airport to City Centre BRT should include appropriate access arrangements.

5.2.2 Access to the Barrysparks Lands must be provided as part of any BRT scheme via an all movement junction of the R132 and via Drynam Road. Our Client would be happy to work with FCC and the NTA in resolving these difficulties.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 17:08
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: swiftway_objection.doc

[redacted]

Comments:

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To Whom it May Concern,

I wish to submit my objection in respect of the proposed Swiftway Bus Rapid Transit – Swords/ Airport to City Centre, with particular emphasis upon the selected emerging preferred route for the BRT from the R132 at the Estuary Roundabout through the Glen Ellan distributor Road to the proposed terminus in Oldtown.

This section of the proposed route flies in the face of due diligence in respect of proper planning and assessment of local transport objectives and requirements as set out by an elected body for an area, which in turn will lead to unnecessary and unacceptable impacts upon the receiving environment.

While the Route Options Assessment Report assesses transport planning policy documents in respect of the proposed scheme, and states in its conclusion (Section 2.8) that '*The need for the scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North. BRT is identified as serving this purpose and allowing key development areas such as Swords to continue to develop in advance of this'*. The route selected does not take account of the transport objectives within the Fingal Development Plan 2011 to 2017 or the specific objectives of the Oldtown – Mooretown Local Area Plan (LAP).

Within Section 6.2 of the Route Options Assessment Report, where the stage 1 assessment is carried out, a specific route option should have been assessed in accordance with the Key Transport objective of the Oldtown – Mooretown Local Area Plan, i.e. Section 3.2.7 of the LAP 'Quality Bus Network'. This quality bus network route was based upon an Integrated Traffic Model which was prepared for Swords as part of the document 'Your Swords, An Emerging City, Strategic Vision 2035'. The absence of this route which would have been in accordance with Fingal County Councils transport policy for the local area, shows an absence of proper planning assessment within the Route Selection process.

The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellen Road extension, in particular in respect of Section 3.2 'Movement Strategy and Transportation Infrastructure', where section 3.2.5 'Glen Ellan Main Street' of the LAP sets out the proposed objectives of the LAP for the Glen Ellan Road. The LAP objective is for a 6m

carriageway with cycle facilities, 4m wide footpaths and 1.5m wide tree lined verges, whereas the BRT is proposing 13m wide carriageway with 2m wide shared surface cycle facilities, 2m wide footpaths and the omission of the tree lined verges. While Section 6.3.2 of the Route Options Assessment Report references the LAP, it then proceeds to disregard the requirements and objectives of the LAP without taking due cognisance of it as a constraint upon the proposed scheme.

Through breaching specific objectives of the LAP, e.g. Key Objectives Transport '*Redesign the Glen Ellan Road Extension so that it's function changes from a distributor road to a main street, which will serve 2 schools, a large park and Local Centre, in addition to dwellings*' the proposed route as planned will have a direct and unacceptable impact upon the existing properties which bound the Glen Ellan distributor Road in respect of noise, air quality, road safety, transport integration, landscape and visual.
Through the planned frequency of buses along this route at 4 minute intervals during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of such duration that it will be in breach of Statutory rights of the residents in accordance with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe), which will subjected to the unacceptable levels of noise.

As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not taken into account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.

At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together and Gaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.
Added to this is the increased road safety issue which would have been identified had a Stage F road safety audit been carried out as the site lines at the estate entranceways are proposed to be substantially reduced due to the increased carriageway width and the proposal to replace the existing footpath/ verge/ segregated cycletrack (circa 5m) with a 2m footpath.

Finally, in response to the economic appraisal carried out as part of this route assessment and in particular the emphasis in the reliability of the journey time in promotion of the BRT. It is of note that while the BRT may replace and improve upon existing public buses, there already exists a private express bus service, serving the Glen Ellan distributor road which provides sufficient frequency and reduced travel times in comparison to the public bus service. As such there could be no appreciable cost benefit in spending money on a service to double up and compete with that already in place.
Whereas should the final section of the BRT follow that proposed within the Oldtown – Mooretown Local Area Plan and the report, 'Your Swords, An Emerging City, Strategic Vision 2035' it would complement the existing transport provisions to the Swords Area, improving the service to a catchment area not already served by a reliable express service and it may make economic sense.

[redacted]

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:18
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of swords and we have been attempting for years without success to get dublin bus, swords express & bus Éireann (school bus) to include Knocksedan on their routes. If Brt/swiftway gets the go ahead , Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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Sent: 28 November 2014 12:03
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

· The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

· Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

· Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 11:13
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
I object to the Swiftway on the grounds that you will seriously damage the quality of my life and that of my children and neighbours. You intend to move our house closer to an extremely busy roundabout. I purchased my house from the plans which included a boundary wall and a green inside that for my children to play on, now you intend to come along and basically just to remove it. I am sure that this must contravene some legal rights of mine and will explore this further within the context of my European Citizens consumer rights. The noise and lights and pollution which you intend to inflict on us by effectively bringing the roundabout close to our doors will be entirely unacceptable.

I cannot also believe that you proposed this route having been moved from the original route, you were told by the previous residents group to move it up where there is a young population and that is exactly the reason why what you are planning to do is unacceptable. Local children will not be able cycle or walk safely to school and the local shops if your plan goes ahead. You will benefit some whilst seriously damaging the quality of life of many others and most importantly you will endanger the lives of some potentially. All of this so that we might have what is effectively a huge bus.

Might have been acceptable to stop at the GAA at bottom of Glen Ellan Road thereby having no detrimental effect on the lives of the residents and still serviing the area. However it is all a very poor substitute for the Swords residents compared with that of Southside residents with Luas. We already have a express bus to town.

To finish I would like to point out that we have already had one dangerous incidents on Sandford Wood Green when a car crashed throught the wall into a house, proving that we are already too close to this roundabout and you must not move us closer.

You will seriously damage the quality and safety of our childrens live for the sake of a reduction in 15 minutes approx. on journey time to city!

Please do not go ahead with this ridiculous route.

[redacted]

--
This e-mail was sent from a contact form on National Transport Authority (http://www.nationaltransport.ie)

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 10:08
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Comments:

Removal of left slip from Collins Ave to Swords rd
will cause existing backup of traffic on Collins Avenue
to get worse
Removal of left turn from Swords rd to Collins Ave
where buses will have to cross bus corridor
& existing backup of traffic on Collins Ave towards Beaumont Junction
will cause backup of traffic coming down Swords road

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 25 November 2014 09:33
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: NT_gsbb.pdf

[redacted]

Comments:
We wish to lodge our objecion to this route which will pass by our childs school – Gaeilscoil Bhrian Boroimhe. Please find attached letter outlining same.

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0434b

'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

Samhain 2014

Don té lena mbaineann sé

Is mian liom/linn ábhair bhuartha a ardú maidir leis an mbealach atá beartaithe don scéim nua bus sciopaidh idir Sord/Aerfort agus Lár na Cathrach.

Tá mo pháiste/í/ ár bpáiste/í ag freastail ar Ghaelscoil Bhrian Bóroimhe atá ar an mbealach atá beartaithe don scéim Nua.

Tá mé/muid buartha faoi na nithe seo a leanas:

1. Is gá do thuismitheoirí áirithe a bpáistí a thiomáint ar scoil. Má leanann an sceim ar aghaidh mar atá beartaithe, ní bheidh aon pháirceáil idir an stop ag Coill na nÚll agus an stop ag Seanbhaile. Cruthóidh sé seo neart fadhbanna do thuismitheoirí a bheidh ag iarraidh a bpáistí a thiomáint ar scoil in am agus bainfidh sé an rogha sin uathu.

2. Beidh brú ar thuismitheoirí a gcaranna a pháirceáil sna heastáit ata cóngarach don scoil (Geata Bhunbaire, Radharc an Chaisleáin agus Gleann an Mhuilleora) agus cuirfidh sé sin brú ar na heastáit chéanna

3. Caithfear bheith airdeallach ar shábháilteacht na gcoisithe agus an bealach nua á dhearadh. Níl ach dhá thrasnú beartaithe taobh na scoile agus is gá go mbeadh níos mó ann chun cur le sábháilteacht na bpáistí a shiúlann ar scoil.

4. Beidh níos mó trácht ar an mbóthar, go háirithe ar maidin agus tuismitheoirí ag iarraidh a bpáistí a sheoladh ar scoil agus cruthóidh an trácht bhreise seo contúirt sa bhreis do leanaí.

I/We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

My/Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

I/We have a number of concerns regarding this route:

1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

Le meas/*Yours sincerely,*

[redacted]

Is féidir an litir a úslódáil ag an nasc seo a leanas/*Upload this file to NTA Website at the following link*:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

An dáta is deireannaí i gcomhair aighneactaí ná 28-11-14/*Closing date for submissions is Friday 28th November at 5pm*

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 17:00
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

From: Ruadhán MacEoin
Organisation: Mountjoy Square Community Association
Address: 19 Mountjoy Square, D1

Comments:
Ruadhán MacEoin
Mountjoy Square Community Association
19 Mountjoy Square
Dublin 1

Dear Sir or Madam,

I write in connection with the proposed City Centre – Swords BRT.

The NTA will be aware of my previous submission, not only regarding this matter (filed March 6th), but also previously with regard to the Dublin Public Transport Plan, filed 04-09-2013.

As was previously indicated, the net effect of current public transport provision through the Mountjoy Square area is that it benefits through traffic with little or no use to people along the routes in the north city centre.

This is partially caused by the unwillingness of Dublin Bus to provide two-way transport along these routes and also by their deliberate neglect to provide services to and from Mountjoy Square after 7pm as it apparently simply does not suit them. Attempts to deal reasonably with them have not succeeded.

This situation is greatly exacerbated also by the way by which Dublin Bus have concentrated their services coming through this area funneled along one or two streets going through the area, ie North Frederick and Dorset Streets. While such an arrangement might suit the operations of Dublin Bus, in effect it means that people around here are cheated of services that could be given them.

It is a bit akin to having schools being developed in an area – but that locals are denied access for their kids, as the schools are for kids of people from outside the area: would that be acceptable?

The original proposal by NTA to route the BRT through Mountjoy Square offered some hope to remedy this.

As was suggested in my submission of March 6th, that was a good choice that could even be better were the BRT to be routed via Jones's and Clonliffe Road so that it could also serve Croke Park and the community adjacent; obviously on major event days the route could divert by North Frederick Street to avoid events.

However, now the NTA appears to have adopted the modus operandi of Dublin Bus – and once again the people of the north inner city are to be cheated out of having any significant benefit of infrastructure routed through their area, despite having to carry the burden of infrastructure routed through their area.

A few months ago, the NTA launched the Dublin Public Transport Plan – a central feature of which is to properly use the existing railway between Heuston and Connolly Stations. As was outlined by me in submission, only one northside station is currently open on this and the adjacent railway at Drumcondra, and there is the opportunity to provide stations in the north city centre at Dublin Zoo, Cabra, Phibsborough and Croke Park.

Moreover, there was in my opinion not just the opportunity – but the legal obligation on the NTA to open a station at Phibsborough Cross Guns Bridge along this route, as it has been a clear ongoing objective in the Phibsborough LAP.

Instead of which, no new station is to be opened along this route – and locals can instead just enjoy the view (noise and pollution) of trains passing them by – with no services for them. This appears somewhat comparable to the way the Germans used to route the non-stop trains through the Jewish ghettos.

All of this is clearly not by accident, as the NTA have been made aware of these issues repeatedly through by supposed public consultation processes.

Hence if it is not by accident, it is by deliberate design.

If NTA designed public transport is really only to serve publics outside our area and not in our area despite infrastructure being routed through it, the NTA and its designer discrimination are simply not wanted.

The current proposals would further exclusion and amount to apartheid public transport provision.

Public transport authorities have consistently failed this area and its inhabitants over the years; the NTA is only the latest to join this sorry affair. Resulting, the local community understandably feels excluded and is entitled to act accordingly.

The NTA should be reminded that access to environmental justice has been made remarkably more affordable.

In such instance, the NTA would do well to be lucky all of the time.

[redacted]

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 19:21
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
this ill conceived idea will make living in the ajoining estates a nighmare, it's already served by a great bus service that is the swords express. Where is the park and ride facilities? I used to live beside a dart station and our road would be blocked up with people parking and walking to the station and not returning till 6 or 7 and on a Friday the would be left over night.i also worry about the safety of my son when the road is made in to a duel carriageway. Please rethink this ridiculous plan

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:41
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Bus route for knocksedan

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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:37
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Matthews_Submission_to_NTA_BRT_28th_November_2014.doc

From: Paddy Matthews
Organisation: Matthews Coach Hire Limited
Address: Callenberg, Inniskeen, County Monaghan

Comments:
E-mail address for correspondence is info@matthews.ie

--
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Submission by

Matthews Coach Hire Limited

To

The National Transport Authority

On the
Swiftway BRT - Swords/ Airport to City Centre Proposed Scheme

28th November 2014

Matthews Coach Hire Limited

Matthews Coach Hire Limited currently operates two high frequency commuter services utilising the M1 Corridor to service Dundalk, Drogheda and the East Meath Coastal area. In addition the company operates services to the 3 Arena and the Aviva Stadium. These services also operate along the M1 Corridor and service the same geographical area as the commuter services.
In the context of the nature of the services operated by the company and the significance of the M1 Corridor to these services the company has a particular interest in the proposals regarding the proposed Swords to City Centre link. This company will support any initiative which would increase capacity, reduce journey times and achieve a significant model shift from private cars but this must be achieved in an appropriate and balanced fashion. However it is the opinion of this company that more targeted cost effective options are readily available by working in partnership with private enterprise.
The company made its position clear as regards to a number of aspects of the proposed Swiftway BRT - Swords/ Airport to City Centre Proposed Scheme in our original submission dated 18th March 2014. Nothing in the published scheme would lead us to significantly alter the position adopted in the said submission.

As states in our original submission the feasibility study for this project stated that it 'demonstrates a clear public sector transport deficit in terms of capacity along the routes outlined'. We would continue challenge this conclusion. It is our clear view that the alternatives to the BRT proposal have not been fully evaluated. Perhaps there is a need to accept that the 'big ticket' project is not always the solution and this is particularly true when it comes to public

transport infrastructure projects. There is a significant volume of work to be addressed within the capacity of the existing system and service providers before we move to such a 'big ticket' solution. The proposed BRT system would incur enormous project development costs and significant impact over a protracted period of time. A small part of this money would significantly address the issues of enhancement of bus stops, QBC's, priority at junctions, new park and ride facilities and co-ordinated marketing with little or no impact on the continued operation of existing services arising from infrastructural work. Equally the benefits would be almost immediate with virtually no downside. In particular we note that there is no provision for any new park and ride facilities to be developed in conjunction with the Swiftway Service.
In particular we wish to comment on the following:

1. **It is intended that the initial operational and maintenance contract for the Swords/Airport to City Centre Swiftway service will be assigned to Dublin Bus.** The simple question on this issue is 'why'? Surely in the context of the proposal to commence competitively tendering of a portion of the public bus service market from Autumn 2016 onward consideration should have been given to a public tendering process for the Swiftway Service? Is the NTA assured that on public tendering and procurement grounds that this decision is legally sound? This appears, in the broader context of the overall proposal and its resulting direct effect on private sector operators, to simple be a mechanism to exclude private operator and maintain an effective state monopoly via Dublin Bus.
2. **Our services, in common with other identifiable private operators, will overlap with the proposed Swiftway Service**, in our case from the Whitehall junction into the city centre. Can we be assured that our vehicles will continue to have full access to all existing and proposed dedicated bus lanes and corridors including those specifically developed to accommodate the Swiftway Service? If the answer is anything other than a categorical 'yes' then the only conclusion to be drawn is that those commuters who commence their journey from Swords and who utilise the Swiftway Service will be given priority over those who are utilising public transport, both state provided and privately provided, whose journey originated north of Swords. Is this equitable in the context of the longer journey times involved for those travelling from Dundalk, Drogheda and East Meath?
3. **It is stated as a core objective of the Proposed Scheme is the enhancement of public transport provision along the general scheme corridor**. **To achieve this, existing bus services will be reorganised** to support and complement the enhanced public transport provision brought about by Swiftway along the corridor. **In some instances**, the planned Swiftway service will overlap with existing bus services operating on the

same route, **some of which may be replaced or rerouted**. In other areas, **existing bus services may also be rerouted or have service frequencies altered** to feed into the Swiftway service and improve overall capacity on the corridor to meet demand. Quite simple this is a very worrying proposal. Clearly existing services such as the ones provided by this company have been developed to meet the needs of our passengers, in our case over a period of some 10 years. **Can clarity be provided that the proposals above will only be applied to Dublin Bus services?**

4. It is difficult to accept the statement that 'any bus services that uses the Swords corridor will however benefit from the enhanced bus priority infrastructure proposed along the Swiftway route and will therefore experience overall shorter journey times' in the absence of clarification of the highlighted statements as indicated above.
5. We note that when referring to the possibility of interchange with other transport services along the route, **there is no reference to private operators.** Our services pick-up and set-down significant numbers of passengers at Whitehall, Drumcondra and Dorset Street (Independent Bridge). It is imperative that we retain the ability to facilitates such pick-up and set-down which would also allow interchange with the proposed Swiftway service.
6. Investing a large capital amount in temporary infrastructure is imprudent when alternative measures at much lower costs could effectively deliver equal results.
   (a) **The private sector already provides vehicles at little or no cost to the taxpayer**.
   (b) The incentive to increase existing service provision could only be enhanced by such measures as enhancement of bus stops, QBC's, priority at junctions, new park and ride facilities and co-ordinated marketing.
   (c) The full benefits of integrated ticketing, the 'Leap card', real time information, on-line journey planning and the proposed tendering of 10% of the services operated by Bus Eireann/Dublin Bus have not yet been realised to any great extent.
   (d) The issues above are compounded by the 'decision' that the initial operational and maintenance contract for the Swords/Airport to City Centre Swiftway service will be assigned to Dublin Bus. How was this decision arrived at, what is the period of contract award, what independent oversight applied to this decision?

It appears somewhat disjointed that the NTA should embark on the implementation of a BRT system which is already awarded to an existing state company which has a virtual monopoly on bus services in the Dublin Metropolitan area <u>before there is an opportunity to</u>

examine the outcome and results of these other current and imminent developments.

It is the intention of this company to fully participate in any planning process that will arise in the context of an application for approval of the proposed Swiftway Service to An Bord Pleanála.

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

Enquirers Contact Details:

[redacted]

Comments:

Removal of Right turn facility @ Gaeltacht Park Swords Road Junction is significant inconvenience to residents of Gaeltacht Park. Local community require local access for normal daily activities. Why can Swords Road not be widened as per Bus stop widening recently carried out on inwards leg to city - this would facilitate right turn facility.

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 27 November 2014 10:25
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Swiftway_letter.docx

[redacted]

Comments:
Please find attached our letter of objection against the Swiftway proposal.

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0440b

'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2.

[redacted]

To Whom it May Concern:

We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

We have a number of concerns regarding this route:

1. It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 27 November 2014 15:28
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
To take away the playing green at Sandford Wood, would move our houses closer, almost on top of an extremely dangerous roundabout. We already have had an incident if a car crashing through the fence and colliding with the front main wall of house on Sandford wood, if you move the roundabout closer to our houses no 99 to 105 you will effectively put us on the roundabout putting all our childrens lives in danger. You will be responsible for any deaths that might occur. The Garda have a record if hiw the car at speed ploughed through the roundabout traversing the green and into the house it is only a miracle that noone was killed. Now you want to put us closer to the roundabout for what us effectively a big bus. Why did you allow some residents of Swords to move this project up here where there are many more young children playing. There is much more space at the end if the road near the GAA where no residents live. Why not have the terminus there.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:18
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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Swiftway
Bus Rapid Transit

Swords/Airport to City Centre
Public Consultation

[redacted]

Comments:

Re Griffith Avenue BRT stop:

I am concerned that this new stop will have an enormous impact on the existing green space which is the proposed new site for this stop. This green area, which includes mature trees will be affected in a negative way.

I am also concerned that the two Griffith Downs road signs which are now located in special brick walls will be affected also. This green area gives the entrance to Griffith Downs its unique character as the walls are made from the same Butterly brick as the houses.

The BRT stop could be accomodated without taking away any of the green area as the bus stop is further up towards the Regency Hotel.

I suggest that this BRT stop (Griffith Ave) should be looked at again and perhaps modified to take my points into consideration.

I would like some feed-back before any alterations are made in this location.

Signed- Peter McDonnell

13/11/14

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:47
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:53
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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This e-mail was sent from a contact form on National Transport Authority (http://www.nationaltransport.ie)

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 19 November 2014 22:05
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

This is the main green area for the houses located within Glen Ellen Park and Glen Ellen Avenue with both of these roads having large numbers of young children regularly using this currently safe amenity.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on other roadways in the area, cause significant problems for 550 students attending St Finians Community College. In addition it will result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

· The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

· Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

· Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT must not be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:49
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
As we are in the process of purchasing a new house in [redacted]
in swords,we find it unacceptable that there is no bus service whatsoever to the estate.
Perhaps it would be feasible for the S.B.R.T. to commence at this estate, or at least have a feeder service to it.

Trusting you will give serious attention to our submission.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 22:07
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Submission_to_NTA_regarding_Swiftway_along_the_Glen_Ellan_corridor..docx

[redacted]

Comments:
To Whom it May Concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme and in particular, the route from Oldtown/Brides Glen/Castleview and along the Glen Ellan Road of Swords.

I want to object in the strongest possible terms, to the construction of this major project through the heart of our residential area. Not only is the provision of such a service for our area completely unrequired, the total disregard for the impact of this BRT scheme on our neighbourhood, our schools and our safety, removes any slight faith or confidence I may have had in its modification or even its delivery as planned.

I wish to object on the following grounds:

The expansion of the Glen Ellan Road.

The main thoroughfare through our neighbourhood is lined with grass verges and is a safe public amenity for walkers and joggers alike. Not only is it a huge part of the aesthetic of the area, it clearly symbolises our district as residential upon entering.
The widening of the road to facilitate additional bus lanes, will not only remove these verges but also encroach inside our estate boundaries, removing walls, mature trees and valuable green playing areas for our children.

The subsequent increased proximity of our houses to the proposed 4 lane road will increase noise pollution through heavy traffic volumes, it will bring additional danger to our children and ultimately diminish the value of our properties. On these grounds alone it is enough to attract the utmost objections.

Proposed Bus Terminus opposite our Schools.

The proposal to build a bus terminus opposite two primary schools calls all common sense into question, but to propose it without any consideration whatsoever (as personally admitted to by your own David King) on how it will affect the schools and surrounding area defies belief.

The removal of parking facilities along the road will cause all sorts of inconvenience for parents and will also encourage parking within the nearby estates. Secondly, the terminus will become an attraction for commuters from further afield to drive to the area and also park in our estates. It could also encourage the introduction of Pay & Display facilities in our estates at a later point.

Ill-conceived and ill considered. Nothing but total disdain shown to the local residents both in drawing up the proposal but also in the public consultations had around the Swords area.

Encroachment inside our Estate Boundaries.

As mentioned above, the proposal to expand inside our estates impinges on the properties and area in which we purchased and abide. It was confirmed that up to 8m of an encroachment in some areas is required to facilitate new BRT bus stops. The loss of the walls around our estate to be replaced with non-matching brickwork will again diminish the look of our area. But overall, the loss of our green areas to bring this traffic closer to our houses is objectionable in the extreme.

Increased Traffic on our main thoroughfare.

It was also admitted to at the local consultation that up to 250-320 BRT buses will pass up and down our road every day of the week from roughly 6am to midnight. On top of what is already a busy road, this increase in heavy traffic is a major hazard in a residential area heavily populated with children. Add the possibility of late night 'reveller' traffic to the nearby terminus and this is a potential problem that is certainly wished to avoid.

Changing of our roundabouts to fully signalised junctions.

Again, the increase in traffic will already slow down access to and from the area, which is congested enough at school times and rush hours. However, the addition of these signalised roundabouts, which provide priority to the BRT's, will grind our neighbourhood to an absolute halt.

Restriction of Access to and from our Estates.

The introduction of the additional bus lanes and traffic will make it extremely difficult and dangerous for residents to pull into and out of our estates. This increased pressure on cars that at many times are laden with young children is unacceptable.

The commencement of a BRT service in an area alongside existing services.

Simply put, the BRT service is not required along the Glen Ellan corridor. The existing Dublin Bus routes along with the Swords Express service cater more than adequately for the area and at no time has any of our Resident Associations been made aware of any sense of a lack of public transport servicing our area. I would be interested to read your own findings in this regard.

Secondly, when compared to existing services, the BRT's will not improve on the time it takes to reach the city centre. Considering the newly constructed bus lanes will be heavily congested with taxis anyway, the fastest BRT will only travel at the speed of the fare laden taxi in front of it.

BRT is a second rate replacement for Metro North.

Given the huge expense involved in providing what is essentially just an additional bus route to the city, it seems ludicrous that anyone would consider wasting limited funds on such a folly. Metro North is clearly what is required. It is also proposed not to plough through existing residential areas, causing untold disruption and inconvenience to local residents to provide a service which to all intents and purposes is already provided for.

Conclusion.

To summarise, I am wholeheartedly opposed to the construction of the BRT scheme anywhere along the Glen Ellan corridor. Alternative routes nearby are far more suited to such a project should someone completely lose their faculties and still deem it a necessary expense.

Should the NTA genuinely wish to provide a public transport solution to the people of Swords and indeed much needed and lucrative visitors to our country via Dublin Airport, I suggest that the same energies be put into exploring ways to facilitate Metro North and not wasted upon projects that in my opinion have been designed to disrupt, antagonise and endanger local communities rather than serve them.

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Submission/Objection to Swiftway along the Glen Ellan corridor in Swords.

0448b

To Whom It May Concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme and in particular, the route from Oldtown/Brides Glen/Castleview and along the Glen Ellan Road of Swords.

I want to object in the strongest possible terms, to the construction of this major project through the heart of our residential area. Not only is the provision of such a service for our area completely unrequired, the total disregard for the impact of this BRT scheme on our neighbourhood, our schools and our safety, removes any slight faith or confidence I may have had in its modification or even its delivery as planned.

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The subsequent increased proximity of our houses to the proposed 4 lane road will increase noise pollution through heavy traffic volumes, it will bring additional danger to our children and ultimately diminish the value of our properties. On these grounds alone it is enough to attract the utmost objections.

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The removal of parking facilities along the road will cause all sorts of inconvenience for parents and will also encourage parking within the nearby estates. Secondly, the terminus will become an attraction for commuters from further afield to drive to the area and also park in our estates. It could also encourage the introduction of Pay & Display facilities in our estates at a later point.

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[redacted]

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 22:10
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Swiftway_Stayaway_-_Proforma_letter_of_objection_-_Fingallians-4.doc

[redacted]

Comments:
Concerns for children going to school and removal of play areas

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Impact on Balheary Park

The current proposal will mean that approximately15 metres of the existing park will be removed along the boundary of the Balheary Road up to the Estuary Roundabout to facilitate the widening of the road for the Swiftway Buses. This will result in the green space behind the GAA pitch currently used by Fingallians GAA Club being significantly reduced in length, this will result in footballs and sliotars going onto the new roadway, as the new boundary with the road will be too close to the existing pitch. Also the area that is used by local runners to do their training will be removed. As Balheary Park is used by a number of clubs for both training and matches, the existing parking challenge in this area will be further compounded by the Swiftway proposal.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Impact on Pedestrians

The current plan proposes to re direct the base of the Fingallians pedestrian bridge in to Balheary Park and proposes the removal of all other pedestrian bridges along the route. This will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of Green space at Glen Ellan Park

The location of the Applewood /Jug Back Lane stop as outlined in the plan will have a significant impact on the Glen Ellan Park Green space. The location of this stop will result in the boundary for the green space being pushed back by about 8 metres at certain points, significantly reducing the size of this valuable play area for children. In addition it will also result in the gradient of this green space becoming dangerously steep at certain points.

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Safety for Children

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Glen Ellan / Sandford Wood / Applewood / Castleview / Brides Glen / Bunbury Gate and South Bank areas.

Points of concern include

- The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

- Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

- Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools - Gaelscoil Bhrian Boroimhe and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

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BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

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BRT must not be a cheap alternative to Metro North

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Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Conclusion

To summarise, I am opposed to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

Upload this file To NTA Website at the following link:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

Closing date for submissions is Friday 28th November at 5pm

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 26 November 2014 16:11
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: SwordsBRT.docx

[redacted]

Comments:
My submission is on the attached word document

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[redacted]

[redacted]

Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre

Having reviewed the proposed BRT Plan for Swords at the Public consultation in the Fingal County Council Civic Offices on the 4th November 2014 and information on the NTA Website for Swords BRT, I wish to make the following submission:

Bus Rapid Transit (BRT)

- BRT has not been fully explained. Where does this fit into the overall Public Transport plans for Dublin. I.e. Connectivity with other transport modes and centres, future transport policy.

- BRT is not a proven means of transport for all cities. It is a relatively new concept. Each city varies and therefore no two cities can be compared like for like when replicating BRT. e.g. Dublin cannot be compared to Toulouse in France for BRT

- The projected cost of BRT (Swords) is €200/250m. This is in my opinion a lot of money to spend on this type of project. There would be a better return on this money economically and environmentally if spent on the Metro North Project

- BRT (Swords) makes no use of the Port Tunnel to save time. It is suppose to be a rapid transit system.

Planning

- The National Transport Authority (NTA) is not independent of Government. It only implements current Government Policy. There has not been sufficient debate on what is the best long term solution for Swords (BRT v Metro) and this proposal is being rushed in ahead of the next general election.

- There needs to be a strategic long term plan developed for Public Transport in Dublin as opposed to badly thought out plans like the Cross City Luas Line. This Strategic Plan should be completely independent of Politicians and reviewed on a yearly basis.

Bus Rapid Transit (Swords v Metro North)

- The Swords BRT scheme is in my opinion being put forward as a replacement for the Metro North Project. It proposes using the centre median on the Swords Bypass that was to be used by Metro North. There is also a proposed separate Dublin City to Dublin Airport BRT Route. This is a waste of resources.

- BRT is being put forward based on cost savings only. This is a mistake.
  I do not think BRT is the correct solution for Swords, the Airport and North County Dublin based on current car usage and the projected growth in housing for North County Dublin in the long term.

- The Metro North project was developed over a longer period of time and it includes two park & ride facilities that are very much needed. It is a well thought out plan and €30 million to date has been spent on it. There are no park & ride facilities for the proposed Swords BRT scheme. BRT does not have the carrying capacity of a Metro at peak times.

- At present Swords is reasonably well served with Buses by Dublin Bus and the privately operated Swords Express.

Articulated Buses

- The type of Buses being suggested for BRT scheme would have a capacity for 120 people. 60 seated passengers and 60 standing passengers. In my opinion this would not be a comfortable way to travel and would not be enough to entice motorist out of their cars and on to Swords BRT.

- The Swords BRT presentation showed no statistics on projected passenger numbers using the service and there was no Business Plan to back it up its case.

- The proposed articulated buses would be powered by diesel. This is old technology and is not environmentally friendly. It would increase our carbon emissions and footprint. Most cities are now using Hybrid, LNG or Electric Buses.

- These Articulated Buses are quite large and would take up a lot of road space. Our road space is limited. Adding Articulated Buses to an already congested road network would be foolish and short-sighted. In the Centre City alone Buses contribute to major traffic congestion because of the sheer number of them and the fact that there are presently no Buses Stations for parking Buses that are not in service.

Swords / Seatown / Malahide Road

- Removal of the Pedestrian flyover across the Swords Bypass into the Pavilions Shopping and replacing it with a controlled crossing makes no sense. This is very busy junction and would put pedestrians at risk of an accident and cause serious traffic congestion at this point. Pedestrian Crossings should never be located in close proximity to a roundabout as is the current practice in Ireland. Controlled Pedestrian Crossings should be minimised and eliminated by Pedestrian Bridges as BRT is supposed to be a rapid transit system.

Swords / Oldtown / Brides Glen / Castleview

- As part of the planning permission for the Gannon Development "Millers Glen" in Swords, Fingal County Council promised a major upgrade of the local road network to accommodate the large increase in traffic volumes. To date this has not happened. The current BRT (Swords) plan proposes a Terminus close to a proposed "Western Distributor Road" on Gannon Lands. Are these upgrades now going to be funded by the NTA for Gannon and Fingal County Council at some later date for donating this land?

- As I am presently resident in the Castleview Estate, I object to the proposed road widening and loss of green space at the entrance to the Castleview Estate for a Bus lane. The proposed road widening has not been explained to the local residents association nor is it included in Fingal County Council plans for this distributor/link road. This is a residential area; it is not designated as a main road. This will seriously impact the valuation of properties fronting this road and will lead to an increase in road usage and noise pollution.

- I object to the proposed BRT Passenger Stop just beyond the entrance to the Castleview Estate. This will make it more difficult for me to enter and exit my estate, thereby devaluing my property. It is a safety issue.

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 10:11
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their route. If BRT/Swiftway gets the go ahead, Knocksedan MUST feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 10:14
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
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Sent: 28 November 2014 10:15
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 10:16
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT/Swiftway gets the go ahead, Knocksedan MUST feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 17:38
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
The last thing Swords needs is another bus service. The people of Swords & the two million passengers of Dublin Airport were promised a light rail system and this is the only solution that should be offered. Plugging the hole with more buses is shortsighted, inefficient and typical of the mismanagement & bad decision making that is rife in the Dept of Transport. This is another waste of resources which will cause boundless disruption for years on end only to become another Irish Water debacle. Please stop this nonsense.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 19:42
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Having been a resident for 10 years I am astounded that you think this is a good addition to this area I am horrified by the lack of foresight . Two fantastic schools were built and although the main access road is narrow and parking is difficult you now propose to remove all parking from the area forcing parents to park in nearby estates which will cause havoc for the residents and force children to walk much further to get to school. The imposition on the existing green area In Bunbury gate and brides glen is wholly unacceptable. The road is currently a very busy rd and proposing busses in the volumes described will make it impossible for residents to get out of the estate at all. I don't think this has been really thought about the impact in the locale
I strongly object to the proposed swiftway plans for this area
Chantal murray

--
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From: WordPress <forms@ntawebsite.ie>
Sent: 03 November 2014 13:55
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

From: Declan Myers
Organisation: Centra (Myers Supermarket Santry Ltd)
Address: Coolock Lane,Santry,Dublin 9

Comments:
I own the Centra store located on Coolock Lane ,Santry. I note from the drawings that there is a proposed stop located to the front of my store. My main concern is parking and that people from the local area or indeed Ballymun will drive to the bus stop, park and leave there cars there for long periods of time. This would result in reduced parking for my customers and therefore negatively impact my business.
I fully support the project but I feel that consideration needs to be give to parking control along the route and in particular in front of my store.There are already a number of cars that drive to Coolock Lane each day park there cars and then cycle into work..A one hour parking restriction would go along way to solving this potential problem.

Thank you.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 11:20
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: BRT_Public_Consultation_Submission_20141125.pdf

[redacted]

Comments:
Attached is a submission I wholeheartedly support objecting to the route planned for the Glen Ellen Distributor road.
The addition of the extra traffic along the Glen Ellen Distributor road as well as the disregard for the development plan already in place for the ares is unacceptable for residents currently in place.
Aside from the additional disruption, traffic and noise that will accompany this new route there is the issue of safety in an area with a large young population both in residence and attending the schools.
The area is primarily residential and the shrinking of footpaths, the increased traffic at the entrances and exits to the estates and the increased noise and disturbance which will follow far negate any potential benefit to additional bus services that, in an area already well served, may not be as economically viable or as heavily utilized as envisioned.

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To Whom it May Concern,

I wish to submit my objection in respect of the proposed Swiftway Bus Rapid Transit – Swords/ Airport to City Centre, with particular emphasis upon the selected emerging preferred route for the BRT from the R132 at the Estuary Roundabout through the Glen Ellan distributor Road to the proposed terminus in Oldtown.

This section of the proposed route flies in the face of due diligence in respect of proper planning and assessment of local transport objectives and requirements as set out by an elected body for an area, which in turn will lead to unnecessary and unacceptable impacts upon the receiving environment.

While the Route Options Assessment Report assesses transport planning policy documents in respect of the proposed scheme, and states in its conclusion (Section 2.8) that '*The need for the scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North. BRT is identified as serving this purpose and allowing key development areas such as Swords to continue to develop in advance of this'*. The route selected does not take account of the transport objectives within the Fingal Development Plan 2011 to 2017 or the specific objectives of the Oldtown – Mooretown Local Area Plan (LAP).

Within Section 6.2 of the Route Options Assessment Report, where the stage 1 assessment is carried out, a specific route option should have been assessed in accordance with the Key Transport objective of the Oldtown – Mooretown Local Area Plan, i.e. Section 3.2.7 of the LAP 'Quality Bus Network'. This quality bus network route was based upon an Integrated Traffic Model which was prepared for Swords as part of the document 'Your Swords, An Emerging City, Strategic Vision 2035'. The absence of this route which would have been in accordance with Fingal County Councils transport policy for the local area, shows an absence of proper planning assessment within the Route Selection process.

The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellen Road extension, in particular in respect of Section 3.2 'Movement Strategy and Transportation Infrastructure', where section 3.2.5 'Glen Ellan Main Street' of the LAP sets out the proposed objectives of the LAP for the Glen Ellan Road. The LAP objective is for a 6m carriageway with cycle facilities, 4m wide footpaths and 1.5m wide tree lined verges, whereas the BRT is proposing 13m wide carriageway with 2m wide shared surface cycle facilities, 2m wide footpaths and the omission of the tree lined verges. While Section 6.3.2 of the Route Options Assessment Report references the LAP, it then proceeds to disregard the requirements and objectives of the LAP without taking due cognisance of it as a constraint upon the proposed scheme.

Through breaching specific objectives of the LAP, e.g. Key Objectives Transport '*Redesign the Glen Ellan Road Extension so that it's function changes from a distributor road to a main street, which will serve 2 schools, a large park and Local Centre, in addition to dwellings*' the proposed route as planned will have a direct and unacceptable impact upon the existing properties which bound the Glen Ellan distributor Road in respect of noise, air quality, road safety, transport integration, landscape and visual.

Through the planned frequency of buses along this route at 4 minute intervals during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of such duration that it will be in breach of Statutory rights of the residents in accordance with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe), which will subjected to the unacceptable levels of noise.

As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not taken into account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.

At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together and Gaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.

Added to this is the increased road safety issue which would have been identified had a Stage F road safety audit been carried out as the site lines at the estate entranceways are proposed to be substantially reduced due to the increased carriageway width and the proposal to replace the existing footpath/ verge/ segregated cycletrack (circa 5m) with a 2m footpath.

Finally, in response to the economic appraisal carried out as part of this route assessment and in particular the emphasis in the reliability of the journey time in promotion of the BRT. It is of note that while the BRT may replace and improve upon existing public buses, there already exists a private express bus service, serving the Glen Ellan distributor road which provides sufficient frequency and reduced travel times in comparison to the public bus service. As such there could be no appreciable cost benefit in spending money on a service to double up and compete with that already in place.

Whereas should the final section of the BRT follow that proposed within the Oldtown – Mooretown Local Area Plan and the report, 'Your Swords, An Emerging City, Strategic Vision 2035' it would complement the existing transport provisions to the Swords Area, improving the service to a catchment area not already served by a reliable express service and it may make economic sense.

[redacted]

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

Enquirers Contact Details:

[redacted]

Notes:

Concerned about road widening outside property.

1. What width of land is being taken?
2. High Trees to be retained? (+ hedge).
3.

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

Enquirers Contact Details:

[redacted]

Comments:

The ban on a right hand turn from the Swords Road into Iveragh Road means that all traffic from the North wishing to access Gaeltacht Park will have to turn right on to Collins Avenue and then left into either of the current access points to Gaeltacht Park. These are very narrow quiet roads. This increased traffic will increase congestion in this part of Gaeltacht PK (and Collins Ave) thereby reducing the resident's amenity.

Has there been a traffic survey conducted to measure the impact this may have?

It is already difficult to turn right from the Swords Rd. to Collins Ave so this measure will lead to further tailbacks on the M1.

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 18 November 2014 21:25
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Huge problem with the skatepark.

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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:49
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: BRTSubmission_AT_C.ie_DCC_FINAL__APPENDIX.pdf

From: Damien Ó Tuama
Organisation: An Taisce, Cyclist.ie and Dublin Cycling Campaign
Address: Tailor's Hall, Back Lane, Christchurch, Dublin 2.

Comments:
Dear Sir/Madam,

This document is a combined submission from three organisations working together: An Taisce, Cyclist.ie – The Irish Cycling Advocacy Network, and Dublin Cycling Campaign. We produced our submission collaboratively as thought it would be easier for the designers to consider all of the points when presented in one single coherent thread, rather than spread over three separate submissions (and involving duplication). I would be grateful if you can note the three separate organisations when listing the submissions received.

I would also be grateful if, in the interests of transparent government, the NTA could publish (online) all the submissions received.

Thank you.

Damien Ó Tuama
National Cycling Coordinator
damien.otuama@antaisce.org

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The Tailor's Hall, Back Lane, Dublin 8.
E: Damien.otuama@antaisce.org
T: 01-7077064
M: +353-87-2840799

National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Friday, November 28, 2014

Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre

Dear Sir/Madam,

I am pleased to make a submission in respect to the above proposal. This submission has been jointly prepared by An Taisce (www.antaisce.org), Cyclist.ie – The Irish Cycling Advocacy Network (www.cyclist.ie) and Dublin Cycling Campaign (www.dublincycling.ie).

The submission comprises four main sections:
Section 1: Overarching Remarks / Standard Points Applying to Many Locations
Section 2: Comments on the General Planning of the Scheme
Section 3: Detailed Comments on Public Transport Aspects
Section 4: Specific points on a map-by-map basic with a particular focus on the perspectives of bicycle users
These are followed in the Appendices by schematic maps by An Taisce of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 including the Swords BRT.

Please excuse any formatting inconsistencies / typos etc. in this submission. It took considerable time to examine the voluminous material made available on your website: http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre/

Section 1: Overarching Remarks / Standard Points Applying to Many Locations

1.1 Dublin Cycling Campaign/Cyclist.ie/An Taisce, as indicated in our original submissions, are overall strongly in favour of the concept of BRT and in this case of the proposed BRT public transport preferred route between Swords and City Centre. We are of the view that the provision of high quality public transport and BRT is an essential strand to an efficient and more sustainable transport system where car commuting is de-prioritised. This imperative is all the more pressing as the scientific knowledge around the cumulative build-up of fossil-fuel based emissions crystallizes further – as set out, for example, in the latest publication of the Intergovernmental Panel on Climate Change (http://www.ipcc.ch/pdf/assessment-report/ar5/syr/SYR_AR5_SPMcorr1.pdf).

1.2 We commend the NTA and consultants in producing such a comprehensive and detailed report and route assessment process. We are particularly happy to see the inclusion of 'cycle network integration' as part of the Multi Criteria Analysis (MCA) approach, as outlined in the Route Options Assessment Report.

1.3 The present drawings which, as indicated, are 'subject to further development', contain a number of minor errors in presentation, which create a certain amount of confusion in determining the detail of what is actually proposed in a small number of areas. We look forward to perusing the final iteration of the drawings in order to comment fully.

1.4 We are conscious that the overall design must meet the requirements of the Roads Act, 1993, Sect 13.(5), which states: "In the performance of their functions under subsections (1) and (2), a road authority shall consider the needs of all road users". From our examination of the drawings and as elaborated below, it appears that at too many junctions and along some links, the cyclist is thought of as a 'pedestrian on wheels' rather than a user of a vehicle and this translates into very circuitous, convoluted and ultimately inadequate provision for cycling.

Junctions, Crossings and Shared Cyclist/Pedestrian Spaces

1.5 We have issues with virtually all of the junctions in relation to cycling and these need to be looked at in detail. The final proposed solutions need to be outlined clearly.

1.6 Four arm / complex junctions. On many/most of these junctions, especially north of the canal cordon, there are a number of serious short-comings. These include:

(a) Inadequate treatment for cyclists emerging from or travelling into local roads. It is totally inadequate for bicycle users to have to take right hand turns in 4-5 stages. See for example Map 9.
(b) For every junction, all right turn and straight-ahead movements need to be checked. In too many cases, these manoeuvres are far too convoluted and disjointed. It seems that it is only the left-turn manoeuvre for cyclists that appears to have been considered!

(c) Additionally, how is it proposed that these junctions will be signed for cyclists so as to

explain how they proceed straight-ahead or turn right? It is important to consider this in detail. If you imagine someone driving a car and approaching a complex junction: at a certain point the lanes are arranged to allow vehicles to go left/straight/right depending on the situation. There are clear and timely markings in the middle of the lanes and often signage explaining to vehicles how to negotiate the junction. At no stage is it expected that a car will stop in the middle of the junction to figure out what is going on or to make a u-turn. Now consider a cyclist approaching a similar junction. In many, if not most cases, it is not at all obvious to a cyclist how they can legally and safely make a right turn or even go straight on. If a cyclist is not familiar with the junction - or has not got a detailed engineering drawing with him/her - the information conveyed by the infrastructure will send the cyclists down the road to the left. This is unacceptable.

1.7 We are very much in favour of roundabout removals, as indicated in the Swords area and on R132, and their replacement by signalised junctions, as these are generally more receptive to safe use by cyclists and pedestrians. However, in too many cases, cyclists are simply shunted into shared spaces with pedestrians which contravenes the NTA's own guidance. Section 1.9 of the National Cycle Manual includes the following advice: "Shared facilities between pedestrians and cyclists generally result in reduced Quality of Service for both modes and should not be considered as a first option." (http://www.cyclemanual.ie/manual/thebasics/1-9-pedestrians-and-cyclists/). This advice is entirely consistent with the feedback we receive hear from the National Council for the Blind of Ireland. Please revisit all situations where (potentially fast moving commuting) cyclists are set the share space with pedestrians.

1.8 Where off-road cycle tracks are proposed, it is essential that there is a level difference with the footway. Shared cycle-pedestrians spaces are only acceptable (both for cyclists and pedestrians and especially mobility impaired pedestrians) in very low flow situations. This design feature is very common in the Northwest Swords area Map 2 particularly.

1.9 BRT/QBC passing a side road on the left. There needs to be design provision for car drivers turning left across BRT/QBC lane *and then across cycle-lane on the inside*. There is a serious safety issue here for cyclists. This repeats itself throughout the scheme.

1.10 When off-road cycle tracks are provided, it is unclear / not thought through how cyclists turn right off the off-road track to access developments on the opposite side of the road.

BRT and Other Vehicles

1.11 We are very unhappy with the proposals for cyclists in relation to crossing the Airport roundabout. The proposals as outlined are a particular deterrent to cyclists traveling north to south towards the city: cyclists will be required to make 4 separate crossings of these busy roads just to get through this junction. This junction design needs fresh thinking where cycling is concerned and we recommend that some form of high quality pedestrian/cyclist bridge is carefully considered.

1.12 It is not clear if there are due to be any longitudinal constraints on the BRT lanes at any stage to prevent interference and entry by other traffic. This is a not-uncommon feature

of other BRT systems. Clarity on proposals to restrict unwanted entry of 'other' vehicles into BRT lanes would be welcome.

1.13 Whether taxis are admitted to the BRT lanes needs to be reviewed on a case-by-case basis. Taxis can facilitate public transport trips and are very useful for people who do not have access to cars. However, if the volume of taxis in a bus lane gets to the point where the buses are being delayed then they frustrate the proper functioning of the system. Consideration needs to be given to the average occupancy of vehicles. For taxis it is low, especially given the number of taxis driving around waiting to pick up passengers. Meanwhile buses can efficiently carry large numbers of people. The Canal Cordon Counts of traffic into Dublin City centre show that efficient bus lanes into the city can carry very large numbers of people, to the extent that they can improve the situation in the general vehicle lanes as well. In particular taxis should be removed from many of the congested city centre bus lanes. When designing for taxis the question should be: Are passengers finding it difficult to find a taxi and what needs to be done about it?

Speeds and Places:

1.14 30km/hr. There are many parts of the route in which: (a) there is a very narrow cycle-lane on the inside of the BRT & Bus Lane, and/or (b) there are (multiple) left-turn movements across the cycle-lane, and/or (c) the cycle-lane is positioned on the outside (i.e. the right-side) of bus-stops and/or left-only lanes. Therefore, one can expect there to be weaving of one type or another across the paths that cyclists will be taking. For these weaving movements to occur safely, speeds need to be low. We strongly recommend that for all of the BRT route within the canal cordon area and for those other parts passing through narrow and/or pedestrian heavy corridors, that the speed limit is set as 30km/hr. We expect this will have minimal impact on journey times as bus speeds would rarely rise about 30 km/hr in these streets. This will also have a positive urban design impact in conjunction with good detailing of the infrastructure.

1.15 Consideration needs to be given, especially in city areas, to the reduction of entry/exit points on to the main route. The development of the BRT proposal needs to prioritise main route traffic flow and prioritise side entry/exit points in order to prioritise traffic along BRT route, increase safety for all road users, and reduce the level of 'rat running' by other vehicles, which are disruptive to residential areas.

Links / Other General Points

1.16 What is the legal position re cyclists using BRT lane?

1.17 It is proposed that blue painted cycle track at particular locations.

1.18 Buffer zones between (parallel) car parking / loading / taxi rank spaces and cycle track. There must be adequate width to take account of wider doors of Sports Utility Vehicles etc. Cycle tracks should never be positioned alongside parked vehicles. It is never appropriate to encourage cyclists to cycle in this position where they are vulnerable to being hit by opening doors.

Section 2: Comments on the General Planning of the Scheme

2.1 An Taisce made a submission in March 2014 on the initial consultation on the Swiftway system, which was strongly supportive of the proposals. http://www.antaisce.org/node/978

2.2 An Taisce also drew and published a series of schematic maps illustrating the potential of the various proposals in the National Transport Authority Draft Integrated Implementation Plan 2013-2018. See this press release: http://www.antaisce.org/node/366 and the maps in full in the appendix of this submission: http://www.antaisce.org/node/978

2.3 An Taisce is strongly supportive of the overall concept of Bus Rapid Transit for Dublin, of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 and of the SwiftWay proposals.

2.4 Detailed comments and constructive criticisms follow below. Here we will make some general comments.

2.5 If one goes back and reads the section on Quality Bus Corridor (QBC's) in the 1995 Dublin Transport Initiative report, there is a list of measures which were to be included in the QBC's. The list is very similar to the list in the current proposals, and what is generally considered Bus Rapid Transit.

2.6 Since 1995 there has been much debate about Bus Rapid Transit, QBC's and Light Rail Transit, both nationally and internationally. The concept of Bus Rapid Transit has become widely known among transport policymakers. The Luas in Dublin has been a striking success with the public and has changed the perception of what public transport can be, among a large sector of the population. The QBC's have been a mixed success. Where good priority and frequency were delivered there has been a large shift from private car use to bus use e.g. the Stillorgan, Malahide and Lucan QBC's. Other QBC's have been less successful. Many of the other high quality customer experience elements of the DTI proposals have not been delivered.

2.7 The conclusion that should be drawn is not that the QBC's have failed, but that they have been a partial success due to their partial implementation. What is needed now is to use the Luas as a local benchmark of quality, and to use international experience of BRT, to upgrade the QBC's to the same level of quality as Luas. The SwiftWay proposal will do this if done correctly.

2.8 It should also be noted that much has been achieved since 1995, which will make SwiftWay a lot easier to deliver compared, for example, to what a typical British city might face. E.g.

- Significant priority has already been claimed for QBC's especially on this Swords QBC route.
- We now have the Leap Card integrated ticket.
- We have a National Transport Authority to deliver integrated transport.

- We have built up considerable local skills thought the RPA and QBN Office.
- We have the Automatic Vehicle Location system and a control centre to manage public transport and traffic.
- The College Green busgate
- The Marlborough Street bridge.
- An Integrated Journey Planner and the Google Maps planner.

The missing pieces of the jigsaw are:

- Integrated branding for urban public transport
- Integrated information and mapping for public transport
- High quality vehicles
- High quality public transport interchanges.
- Good running surfaces
- Signal priority in certain areas.

Long Term Potential of BRT

2.9 Dublin has expanded massively over the last generation into a sprawling low density city. We will never provide an integrated Paris Metro public transport system across the entire city using rail due to the size and density of the area to be served.

2.10 It is crucial to deploy our investment as widely as possible and to provide an integrated network. An Taisce has illustrated this network effect in the maps in the Appendix. It can be seen that the SwiftWay and Phoenix Park tunnel projects can for the first time provide a significant integrated network of public transport services across the city. It can be seen how many potential trips could be made by making only one transfer.

2.11 Suggestions have been made in some of the maps in the Appendices for improved integration. Other maps also illustrate the long-term benefits of the Dart Underground proposals.

2.12 Another benefit of the BRT proposals is that they can be deployed quickly. If they are successful, as they have been elsewhere, a debate can be held about extending them to other areas such as Ballymun, Coolock, Finglas and Lucan. See the maps produced here by Aris Venetikidis for the longterm potential: http://www.venetikidis.com/ArisV/DUBLIN_TRANSPORT_MAP.html

Comments on Capacity

2.13 The comments on capacity, that BRT is a mode that fits in between conventional bus and Light Rail Transport, are not valid. International guidance and examples show that BRT can provide the same capacity as Light Rail Transit. There are a variety of criteria for why one might choose between Light Rail Transit and Bus Rapid Transit. It is not a case of deciding the capacity that is required and then selecting the mode. The existing QBC's such as the Malahide, Lucan and UCD ones, have an actual delivered capacity of up to 8000 passengers per direction per hour (i.e. buses with capacities of 91 or 125 at 60 to 120 buses per hour.).

Environmental Concerns

2.14 As noted there are a variety of options for propulsion of the vehicles. Wrightbus in Ballymena manufacture efficient diesel hybrid buses. The Cristalis trolleybus BRT system from Lyon is also an option. When considering the environmental benefits it is important to consider the potential reduction in car use. E.g. A BRT system with diesel buses will still deliver a reduction in local and overall emissions due to the reduction in private car use. Furthermore the lower cost of BRT means that more if it can be deployed. The potential for emissions reduction per euro of investment should be considered.

Section 3: Detailed Comments on Public Transport Aspects

Welcome for the scale of the investment

3.1 An Taisce strongly welcomes the improvement in provision for buses that these proposals represent. They should be able to deliver a proper Bus Rapid Transit service rather than just some sort of super-QBC. In particular we welcome:

(a) The decision to provide continuous high quality infrastructure and to address pinch points through road widening, land purchase, bridge reconstruction and significant construction. In the past QBC's were often limited to working within the existing roadway leading to significant comprimises.

(b) The reallocation of general traffic lanes to bus lanes and the creation of bus only streets in the city centre.

(c) The rationalising of lane widths for all lanes along the route. The consideration of urban design in the City Centre.

The Dublin Port Tunnel Bus Services

3.2 The bus services through the Dublin Port Tunnel from Swords and the Airport will remain attractive for many passengers. They may serve different areas, provide a better door-to-door journey time or provide a better chance of getting a seat. Both should compliment each other. The branding of these Port Tunnel services should be considered in the delivery of the Swiftway to Swords. At BRT platforms in Swords and the Airport there should be clear information on the different options passengers have.

Enforcement of Bus Lanes

3.3 The BRT lanes in the centre of the Swords bypass are a welcome innovation. Where kerb lane BRT lanes are provided: General traffic should not be allowed enter the BRT lane beyond the junction at all. Before the junction all general traffic should generally be excluded. If traffic is allowed in, it should only be left-turning traffic. Traffic going straight-on should not be allowed in as is the present arrangement on many QBC's.

3.4 Consideration should be given to concrete, plastic or rubber physical separators to exclude general traffic.

3.5 The legislation should be amended to allow for enforcement cameras on the front of buses. If they encounter a vehicle illegally in the bus lane they should record this

allowing a fine to be posted out. This would be fair and efficient as, by definition, the illegal car would be delaying the bus.

Bendy Buses

3.6 There appears to be a prejudice against bendy-buses in the London based media. These are run successfully in many places across the world and can be designed to work in Dublin.

3.7 The trial of bendy buses on the No. 4 a few years ago was doomed to fail from the start due to the use of bendy buses with only a single door.

3.8 In the section on cycling we have made detailed comments about bike-bus interaction.

Urban Design

3.9 There is a need to consider a wider range of criteria when designing the system that narrow transport considerations. The routes will run along key urban corridors. For Dublin to be an attractive and competitive city for citizens and investors, we need to design streets that are beautiful and that consider all uses.

3.10 The Line 4 BRT route in Nantes is a leading international example. The design of the Luas on Harcourt Street and the Luas Red line through the City Centre are also good local examples.

3.11 The new Irish Design Manual for Urban Roads and Streets is excellent and should also be used: http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownLoad,32670,en.pdf

3.12 A good reference on integrating BRT into urban streets is the CERTU report on Bus with a High Level of Service (BHLS). It explains the need to provide a façade to façade urban design treatment. http://www.uitp-bhls.eu or available on request from secretary@antaisce.org

Branding

3.13 The SwiftWay branding and graphic design looks weak.

3.14 We already have good and respected brand for this type of service with the Luas brand. This brand should be used for the BRT routes too. The Luas level of quality should be used as a benchmark in delivering a similar level of quality for the BRT routes.

3.15 There is also a need to rationalise and integrate branding of public transport generally in Dublin. London has Cross Rail, Underground and bus. Paris has RER, Metro and Bus. Germany has S-Bahn, U-Bahn and Bus. Spain has Cercanias, Metro and Bus. Ireland should follow this good practice. We should have a hierarchy of services based on the passenger experience not the operator or mode. We should brand the network around a hierarchy of three levels of service: DART, Luas and Bus.
(a) DART: Covers longer distances with greater station spacing with high capacity and a minimum frequency of 4 services per hour. Can be electrified or diesel trains or possibly an express Airport bus service through the Dublin Port Tunnel.
(b) Luas: Serves urban area of Dublin with medium sized distances and stop spacing

and a minimum frequeny of 6 services per hour. E.g. the existing Luas Light Rail services and the proposed BRT services.
(c) Bus: The remaining bus services which compliment Dart and Luas. See the maps by Aris Venetikidis to see how this might look in practice.
http://www.venetikidis.com/ArisV/DUBLIN_TRANSPORT_MAP.html

Points to Consider in the Detailed Design for Part 8

3.16 The detailed design for the Part 8 Planning Application should consider the following points.

3.17 Branding and mapping. A map of high quality public transport including DART Luas and Swiftway must be produced and used. It is pointless displaying maps of independent DART, LUAS and Swiftway systems on each individual service. What the passenger needs is an integrated transport system.

3.18 The detailed design must address signage for integration with other high quality public transport services. e.g. with the train at Drumcondra and the Luas in the City Centre. There needs to be clear information for people getting off a Luas or Swiftway on the platform to guide them to the platform of the next service they wish to get. This will be difficult to design in the O'Connell St. / Abbey Street area but is very important. See for example the new Barcelona Bus Network http://www.tmb.cat/en/nova-xarxa-de-bus where there is information and signage on the footpath to guide passengers from one stop to the next.

3.19 From Parnell Square to Earlsfort Terrace the Swiftway goes through some of Dublin's set-piece urban spaces such as O'Connell Street, Parnell Square, Merrion Square and St. Stephen's Green. A high level of detail will be required for the Part 8 application to demonstrate how these spaces will work as urban places, including street furniture and paving layouts and materials.

Section 4. Specific points

Map 19

- Leeson Street and Earlsfort Terrace
  - As per sections A-A and BB, cycle-lanes of a width of 1.2m are far too narrow. As the designers may well be aware, the research of Parkin & Meyers (2010) showed that drivers pass more closely to cyclists within narrow cycle lanes than to those cyclists on roads without narrow cycle lanes. Such narrow lanes are at best pointless and at worst dangerous. See Earlsfort Terrace point below.
- The Leeson Street / Stephen's Green junction is still hostile for cycling as per these designs. More specifically:
  - The (intimidating for many) right hand turn from Leeson Street onto Stephen's Green West remains the same. this is an opportunity to address this issue

- The provision of a straight ahead eastbound cycle lane from Stephens Green South on to Leeson St is already part of the Stephens Green East scheme yet to be completed fully. This has not been included on this drawing and should be.

- Earlsfort Terrace
  - The National Concert Hall is one of the main cultural institutions in the city, and before and after events, concert goers drift back and forth across the street to the hotel and bar across the road. Surely there is an opportunity here to redefine Earlsfort Terrace as a place – and an attractive public space using high quality materials? As with the existing designs, the street is very much 'channelised' into a series of corridors defined by lines and signs. This represents a lost opportunity.
- Earlsfort Terrace/Hatch st

We note no specific provision for BRT along Hatch Street, and query the viability of the movement from Earlsfort Terrace into Hatch St. Is this feasible with large BRT vehicles?

- Merrion Row.
  - The footways on this street are of an excessively narrow width and have been for decades. The effective width is even narrower given the presence of bollards. Surely this is an opportunity to widen the paths.
  - A contra-flow cycle track on this street linking back as far as Baggot Street Lower is really needed here.
- Merrion Square West

o We do not understand why the nose-to-kerb car parking directly adjacent to the southbound cycle track is retained, as from the drawings it would appear that access to traffic other than public transport and bikes is forbidden.. Surely this is the time to move this parking – and the drawings show extra proposed parking on Merrion St Upper and there is ample parking on the other sides of Merrion Square.

- Merrion Street Lower / Lincoln PlaceWe are happy with the provision of a northbound contra-flow cycle track on Merrion St. Lower, but provision for entry into rear of Trinity College should be included we are concerned about the utility of an off-road cycle track takes a tight (LH) turn onto Lincoln Place - do we want this last piece in!!?
  - LH turn from Westland Row onto M.St. Lower. It is a really bad idea to position a cycle track on the LHS of a tight left turn here. The safer manoeuvre here is for the cyclist to take the lane; otherwise they risk being crushed.
- Leinster Street
  - We strongly endorse the proposal to run a contraflow cycle lane Westwards to link with Nassau Street (and on to Suffolk Street)

Map 18

- Westland Row
  - As per the designs, no northbound cycle lane is shown, even though this is a priority Cycle Route 13 in proposed GDA cycle network; cyclists, it is assumed, will share the BRT & bus lane. It is recommended that the speed limit on this street is set at 30kph.

  There is no p
- Lombard Street

- o We strongly endorse the proposal to run a northbound contraflow cycle track along Lombard St. However, the plans need to be clear on a route for cyclists coming from Westland Row northbound to enter Lombard St. This needs to be addressed. We also suggest that thehis northbound route be extended to Liffey.
- o Similarly the contraflow track needs to continue northwards onto the quays

- Pearse Street
  - o Westbound. Given the proximity of this route to Trinity College Dublin and the nearby Dublin Bikes station, it is preferable that a wide (2.5m +) cycle track is provided here to allow for cyclists of mixed abilities to over-take each other. There is adequate width available from building to building to cater for this proposal.
  - o Eastbound. We strongly endorse the proposal to have an eastbound contraflow cycle lane. However, the tie-in with the D'Olier Street cycle-lane needs to be re-examined/configured. Additionally, the contra-flow cycle track on Pearse Street needs to be extended southbound along the rest of Pearse Street towards Ringsend Road

  We note proposed repositioning of pedestrian crossing on Pearse St close to Shaw Street and wonder why!?
- College Street

o While appreciating that the BRT route does not extend beyond the College Green area , we feel it is incumbent to indicate how the prioritised Cycle Routes 7 & 11 in the GDA Cycle Network, will link in with Dame St/Nassau St It is unclear from Map 18 what is proposed at the junction of College Street and Westmoreland Street. How is it proposed that bicycle users will continue onto College Green (and then onto Dame Street and Grafton Street)? This is too crucial a junction to be left unresolved!

- D'Olier Street/College St/Westmoreland St

We strongly endorse the general proposals for this area. The proposals should greatly improve these areas as public spaces. But, we recommend that the complex junction at CollegeSt/Townsend St be given a clear 'Visualisation' to enable clarity of interpretation. We also suggest that provision be included for cycling to and from Hawkins St.

- o We strongly endorse the proposal to rationalise the space on Dolier St so that there is only one remaining Shared Bus & Traffic Lane. We are concerned however with the design detail, traffic signalling and positioning of the cycle-lane to the left of the BRT & Bus Lane when, presumably, buses will be turning left onto Townsend Street

- Westmoreland Street
  - o It appears as if the proposed off-road cycle track is two-way. The drawings need to show the tie-ins with other tracks more clearly.

Map 17

-
- O'Connell Street

o We note O Connell St plans for cyclists are still to be developed, but also note present plans show no provision for northbound cyclists between O Connell bridge and Henry St Northbound. Plan for cyclists?

- o Southbound. Proposals for cyclists to access Westmoreland St 2 way cycle track from O Connell St should be clarified

- Parnell St and Marlborough St, while not prioritised in the GDA Cycle Network, should be referenced as potential 'low traffic' cycle routes and designs incorporated to faciliate cycle movement avopiding thje busy O Connell St both in north and south directions
- Parnell Square East
    - Northbound. We warmly welcome the provision of a northbound cycle-lane to link with North Frederick Street. We also support the design element of having a cycle track behind the bus-stop. This will work well on the incline as the speeds of cyclists will be low/moderate.

    The proposal as outlined for a 'shared lane' northbound on Parnell Square east needs to be clarified. Is this to include ALL traffic as it would appear!? We are not in favour of 'other' traffic in this area, as it will critically affect BRT and public transport performance.

    - Re: the idea of having the cycle track behind the bus-stop on the southbound direction, we are cautious about the idea of fast-moving cyclists interacting with embarking/disembarking bus passengers here. The detail needs to be right here.

Map 16

- Consider reduction in side entry/exit routes to increase main route traffic flows, improve safety for all road users, and reduce 'rat running' traffic levels.

we note provision at Binn's Bridge for proposed Royal canal cycle route crossing

- North Frederick Street
    - Outbound. Adequate buffer between parking/loading/taxi bay and cycle track?
    - Inbound provision for cyclists between Dorset St and Hardwicke St on N Frederick St needs to be clear as this is also part of GDA Network cycle route 3
- Dorset Street Lower
    - Outbound. Concern that a (narrow) cycle-lane is positioned on the inside of the BRT & Bus Lane and that there are multiple side roads into which cars will be turning. From a Bikeabilty perspective, the cyclist would be safer cycling in the middle of a narrow combined bus and cycle lane.
    - Both cycle lane and BRT lane widths are sacrificed on part of this route (see Section CC) - this design needs to be revisited, favouring sustainable transport options, possibly at the expense of reducing pathway widths and placing public lighting on buildings rather than lamp standards!?

Map 15 (Drumcondra)

- Drumcondra (Tolka River) Bridge
    - Outbound. There is conflict between visualisation diagram and outline plan drawing. If Shared space between pedestrians and cyclists is proposed as in Visualisation it puts both parties at risk. Additionally, the north end of the cycle track brings cyclists back onto the carriageway at the point where vehicles turn left. POTENTIALLY VERY DANGEROUS.

    - Inbound. Cycle lane alongside BRT & Bus Lane looks very narrow. See general point above.
- Upper Drumcondra Road
    - Staggered pedestrian crossing. A single stage crossing would treat pedestrians with more dignity rather than treating them like sheep!
    - Outbound. Outside St. Patrick's College, is the cycle lane part of the BRT platform?
    - Inbound. Junction with Richmond Road. Again, cyclists are being positioned in a less-than-ideal situation with respect to left turners into Richmond Road. This need revisiting.
- Lower Drumcondra Road
- The proposed cycle tracks appear to mirror existing routes. Many seasoned cyclists stay on main road at this location due to poor quality of cycle track and the number of junctions to be negotiated, where present priority is for exiting motor vehicles. The priority for cyclists needs to be clear from all directions!
- The longitudinal profile of the cycle tracks in both directions on this section needs to be improved, particularly at crossings of minor roads. The present profile is one of the reasons why many cyclists remain on the main road. There is also an opportunity to improve the relatively steep entry to the southbound cycle track by relocating the entry point from Drumcondra Road Lower to a point further northwards.
- This section as in many others along the proposed route needs to give consideration to closing off a number of side road entry/exit points, and developing alternative traffic flows. the side road incursions, while necessary at some points are disruptive of main route flow, and need to be prioritised

Map 14 (Drumcondra / Griffith Avenue)

- Outbound
    - Junction with Wellpark Avenue. Left-turn conflict with straight-ahead cyclists - need to be clear on priority.
- Inbound
    - Junction with Griffith Avenue. Left-turn conflict with straight-ahead cyclists - need to be clear on priority.

  major issues again with cycle options at Griffith, especially for right turners, and also for straight ahead priority, both on main route and East-West legs

Map 12 (Whitehall)

- Swords Road / Collins Avenue Junction
    - The same issues in relation to shared facilities occur again
    - major issues again with cycle options at all junctions especially for right turners, and also for straight ahead priority
    - Cyclists mixed with pedestrians here. Not satisfactory.
    - How is it proposed that inbound cyclists on the Swords Road turn right onto Collins Avenue?

    - How is it proposed that eastbound cyclists on Collins Avenue (Whitehall side) turn right onto Swords Road to head inbound?
    - Particular difficulty with cyclists travelling from old Swords Road towards City and how it is proposed that they negotiate this junction
    - No idication of west-east or east-west cycle orovision on Collins Avenue
- Swords Road/Shantalla Road Junction design needs a full revamp to take account of Priority Cycle Route 2A from Swords to City Centre. Design shown on Map 12 is unclear in realtion to priority. Consideration should also be given to close off minor roads to motor traffic at this junction

Maps 11 and 13 (Coolock Lane/Santry)
We assume that proper priority will be given to BRT crossing on Coolock Lane and at Swords Road junction
The same issues in relation to shared facilities occur again
major issues again with cycle options at all junctions especially for right turners, and also for straight ahead priority
While we appreciate that the proposed cycle routing through Santry village is not on the direct route of the proposed BRT, we are very disappointed with the marginal changes proposed through this area, shown on Map 13. This is not in keeping with the stated aims in the Route Options Report Section 2.7, to provide...'cycle infrastructure to the appropriate level and quality of service (as defined by the NTA National Cycle Manual) required for a primary cycle route', nor for what is proposed as major Cycle Route 2A in GDA Cycle Network.

- Outbound
    - Left turn slip lane into Omni Park creates a difficult zone for cyclists. Not recommended as per Cycle Manual: "Slip lanes often give drivers an unreasonable sense of priority, and by virtue of their oblique geometry, they restrict views of cyclists and pedestrians. They should be removed wherever possible." (http://www.cyclemanual.ie/manual/designing/4-5-left-turns/)
    - Crossing of Santry Avenue. It would be advantageous to run large cycle logos across the junctions here - i.e. to link with cycle/bus lane on other side of junction.
- Swords Road / Coolock Lane junction. Provision for cyclists is totally inadequate here. Cyclists appear to be given the crumbs at the table here and are mixed with pedestrians. How is the right turn from Coolock Lane onto Swords for cyclists supposed to work?We would hope that this is not indicative of the standards proposed for Route 2A as outlined in the final GDA Cycle Network Plan!?

Map 10 (Santry Lane / Turnapin)

- South of Santry River (on both sides of the road)
    - Cyclists mixed with pedestrians on a shared surface. This is inadvisable on a commuting route where cyclists will be travelling at speed, and it should be possible to extend the land take on Morton Stadium side to enable full separate provision..
- Turnapin Lane junction
    - Need to avoid mixing cyclists and pedestrians here as well [CHECK GRADIENTS HERE. SPEEDS WILL BE HIGH IF THIS IS DOWNHILL]

Map 09 (Dardistown)

- Junction of Swords Road and Collinstown. The design of this junction needs to be revisited. Cyclists appear to be an after-thought, sharing with pedestrians and losing priority for many movements. More specifically:
    - Provision for northbound cyclists along Swords Road across this junction is too fragmented and discontinuous.
    - Right turn for cyclists from Collinstown onto Swords Road inbound. How does this work?
    - Similarly right turn for cyclists coming from airport on to Collinstown Road

Map 08

- Inbound and outbound. Shared space between (potentially very fast moving) cyclists and pedestrians is unsatisfactory. - this section has just been recently completed as laid out on this drawing. It is essentially no change to the existing situation, which has been praised in a number of quarters!
- Junction of Swords Road and South Corballis (airport entrance) Road. There is terrible service here for cyclists:
    - On every arm of the junction it appears to be assumed that all cyclists turn left! What about (i) straight-ahead manoeuvres and (ii) right hand-turns?! This need to be catered for properly.
- North of South Corballis(Airport Entrance) Road going outbound, heading northwards
    - This provides a very low level of service for cyclists through sharing space with pedestrians and losing priority at six entrances. This is not of a standard consistent with the new cycle manual!
    - It is completely unclear how cyclists will turn right off this 'facility' - turn right to where!!?? - there are no options
- Junction opposite 'Kealy's'.
    - Conflicts / loss of priority for southbound (staight-ahead) cyclists with left-turners. This needs to be revisited. - this at present is a dead end entrance with no activity….but point taken

Map 07 (Airport Roundabout / Cloughran)

- Airport Roundabout
    - North, East and South arms. It is assumed that these will be signalled to provide priority for BRT? - this roundabout is already a signalled roundabout. Are you just making a GENERAL point here as it should be assumed that ALL junctions will give priority!?
    - As mentioned above under 'General Points', the cycle provision at the main Airport Roundabout is unacceptable and will not lead to increased cycling along this route due to the complexity of movements required when heading towards the city. This junction requires a radical solution.
- Clonshaugh Road junction
    - We welcome the conversion of the roundabout to a signallised crossing.
    - However, it is still slightly unclear how each of the right-turn manoeuvres for cyclists will take place. There appears to be little right-turn pockets to support two-stage crossings. Will these be supported by dedicated cycle signals to

enable cyclists to move ahead of the traffic which is behind them (some of which might be turning left)

Map 06

- Two-way cycle track on East side of road. We are uneasy about the provision of two-way cycle tracks alongside roads where there are adjacent developments or side-roads, given that drivers exiting these places may not expect to see cyclists.
- Outbound. Cycle provision outside of Texaco. Given the geometry of entrances to the petrol station here, there is a high risk of conflict with straight-ahead moving cyclists. The design here is totally inadequate to meet the five needs of cyclists: road safety, coherence, directness, attractiveness and comfort - as stressed in the NTA Cycle Manual (http://www.cyclemanual.ie/manual/thebasics/fiveneeds/)
- Dublin Road / Boroimhe Road / Airside four armed-junction and approaches to the junction.
    - See standard point above.
    - Shared space with pedestrians on a commuter cycling route is not satisfactory
    - Both straight-ahead and right turn movement for cyclists are convoluted. They also involve the cyclist interchanging between being a cyclists and pedestrians-on-wheels.

Map 05 to Map 03

1 We fail to understand in the context of the overall design why no cycling provision is proposed along the R132 between the Estuary and Pinnock Hill roundabouts, despite the explanation in Section 3.4.3 of the Options Assessment Report. The R132 is the most obviously direct route from North Swords & North Dublin to the airport and city centre, and there is adequate width to enable cycling provision to be accommodated.

- Pinnock Hill Roundabout/junction
    - We welcome the conversion of the roundabout to a signallised crossing.
    - However, provision for cyclists at this reconfigured junction is still VERY poor.
        - While there are four general traffic lanes plus the BRT lane on the southern approach arm to the junction, cyclists are lumped in with pedestrians and forced to take a convoluted route simply to continue through the junction. This is the type of design we came to expect 15 years ago, but not in 2014! This needs revisiting. Cyclists are not pedestrians whenever a junction appears!
        - All other arms and manoeuvres need to be ‘proofed’ from a bicycle perspective.
- North of junction, what happens to cyclists?!

Map 04

- Junction with Malahide Road
    - While we welcome the conversion of the roundabout to a signallised four armed junction, the proposed design still looks like it represents an incredibly intimidating space for cyclists. By providing so many lanes of traffic(left-only,

straight-ahead, right-only) on the approach to the junction, this has the effect of creating a very long crossing distance for cyclists using the Malahide Road. Even for pedestrians (and especially elderly or more mobility impaired pedestrians) walking across four lanes of traffic to reach the BRT stop will feel intimidating. In the context of ultimately seeking to reduce car trips, these types of designs where so much provision is made for cars need to be phased out.

- Junction with Seatown
    - Similar comments to previous points above apply.

  The cycling links at the Seatown Junction (Map 4) on the R132 need to link in with plans being developed for the Sutton to Swords cycling route, and should indicate these potential links, as this route is likely to be quite busy and used for leisure cycling once developed.
    -

Map 03

- Castlegrange Road / R132 junction.
    - There is inadequate clarity as to how cyclists are to cross the R132, say, to travel from Castlegrange Road to Newcourt Road (? i.e. the road off which Newcourt links). Sharing with pedestrians is not satisfactory. Cyclists are road users not pedestrians! PLEASE STOP TREATING CYCLISTS AS PEDESTRIANS WHEN THEY REACH JUNCTIONS.
- Balheary Road crossroads.
    - Once again cyclists are turned into pedestrians at junctions. This is not satisfactory.
    - How are cyclists to go straight and turn right for each movement through the junction? Clearly this has not been addressed.

Map 02

- West end of scheme
    - Again, the cyclist is assumed to be a pedestrian on wheels. Not satisfactory.

Map 01

- For various stretches on the westbound and eastbound directions, it is unclear / not thought through how cyclists turn right off the off-road track to access developments on the opposite side of the road.

We trust you find the above comments helpful as the scheme advances to the next stage. We look forward to seeing the next iteration of design drawing.

Yours faithfully,

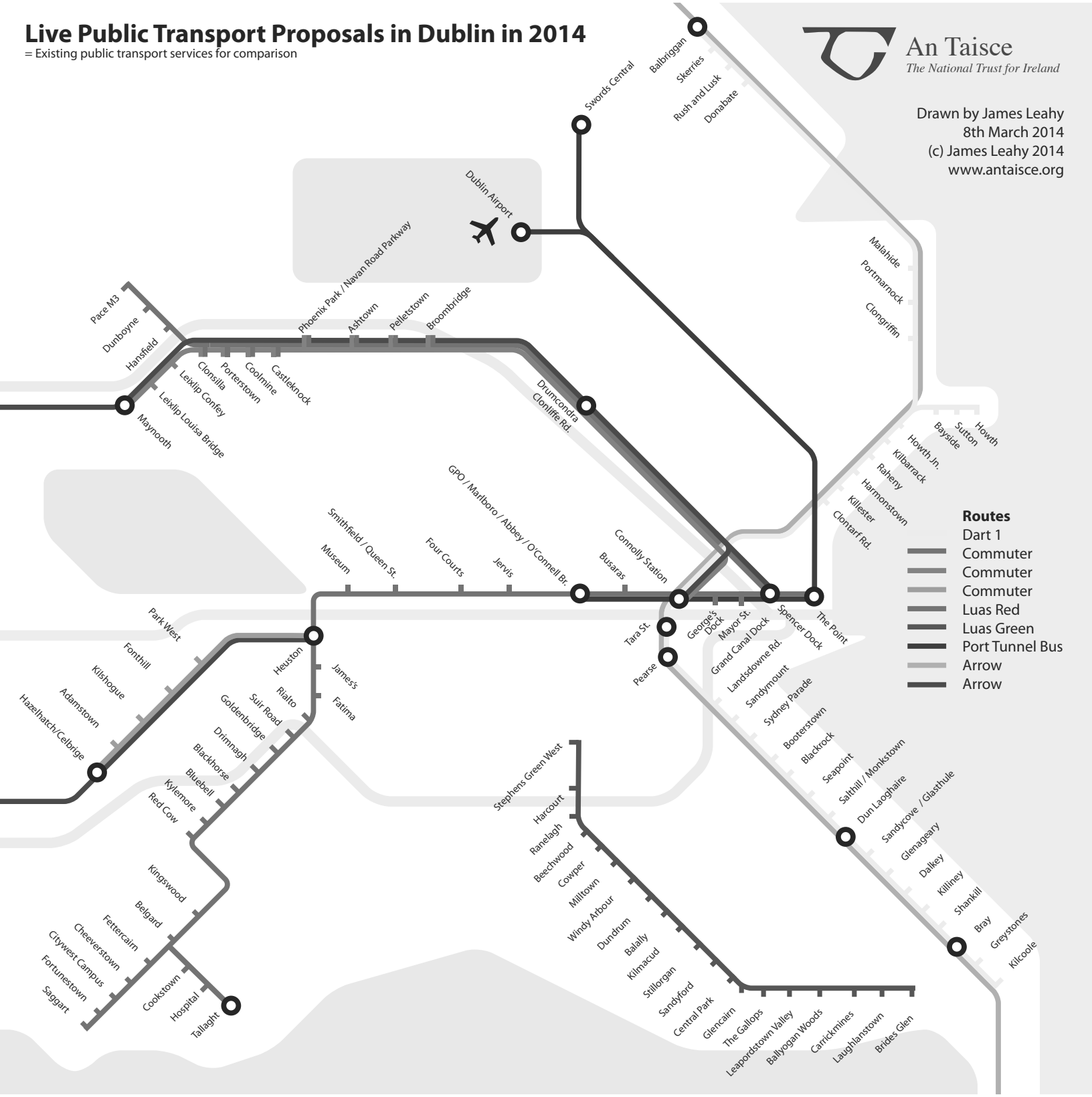
Damien Ó Tuama
National Cycling Coordinator – Cyclist.ie / An Taisce

APPENDIX

Schematic maps by An Taisce of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 including the Swords BRT.

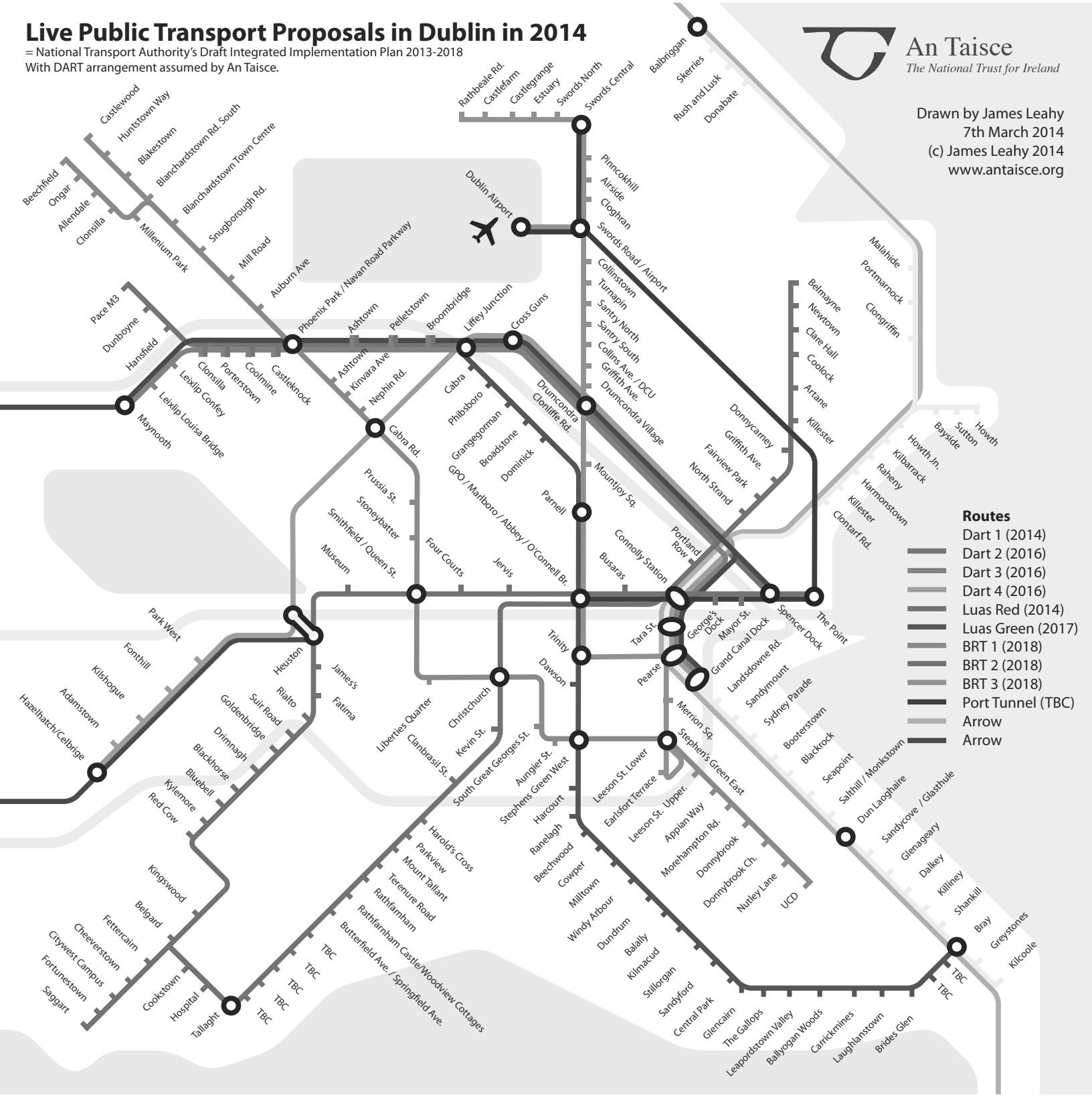
Live Public Transport Proposals in Dublin in 2014

= Existing public transport services for comparison



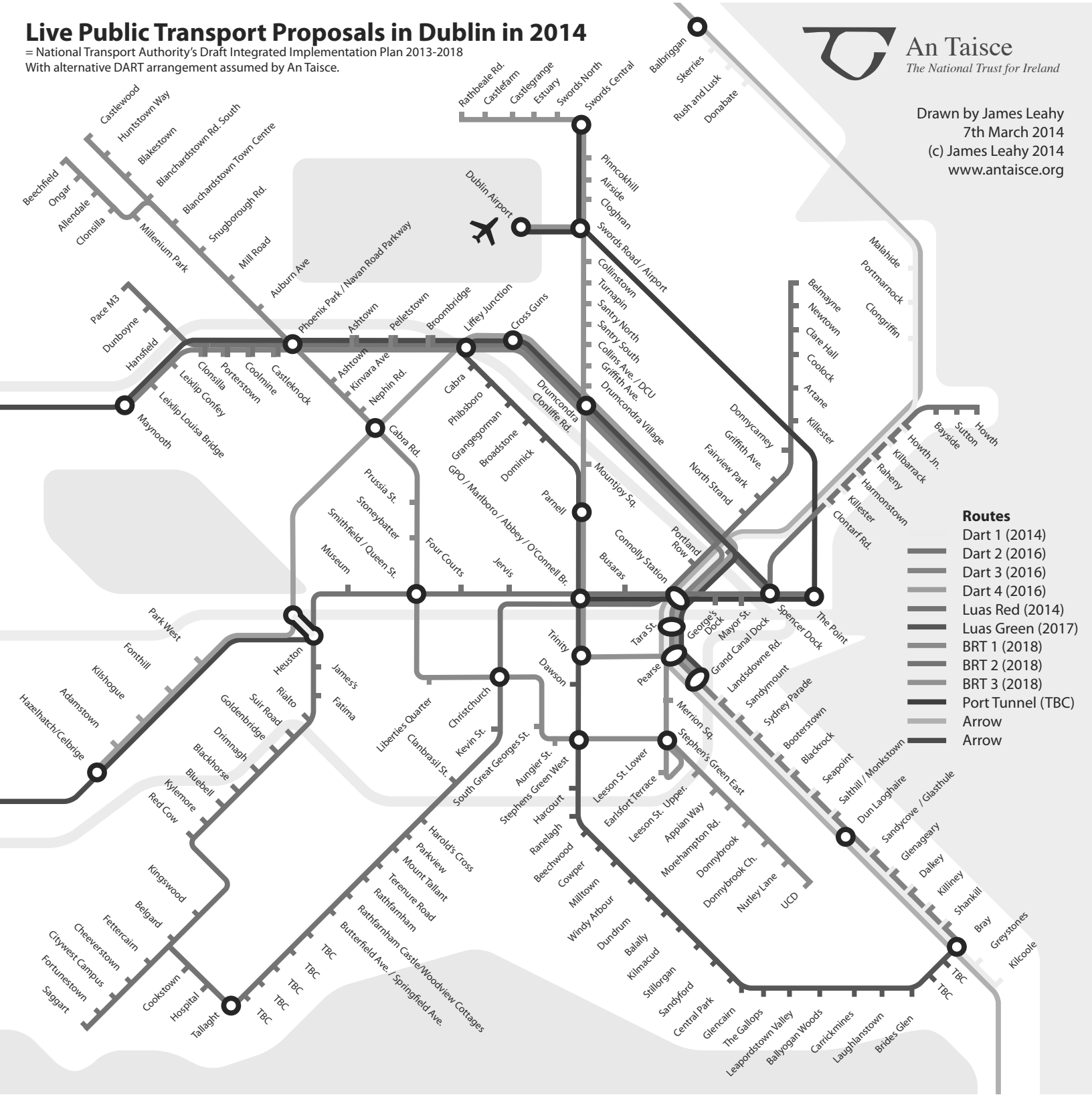
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With DART arrangement assumed by An Taisce.



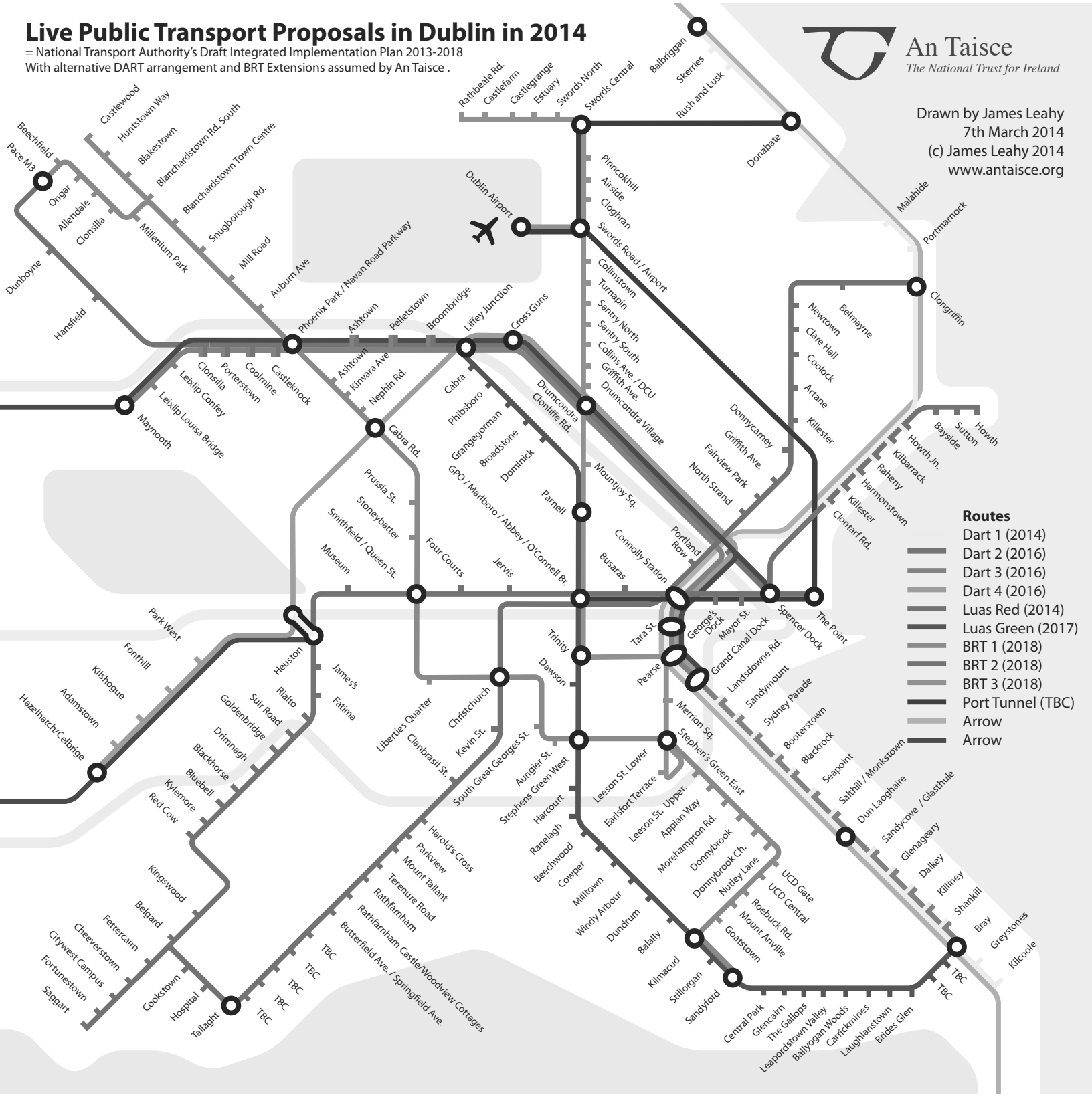
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With alternative DART arrangement assumed by An Taisce.



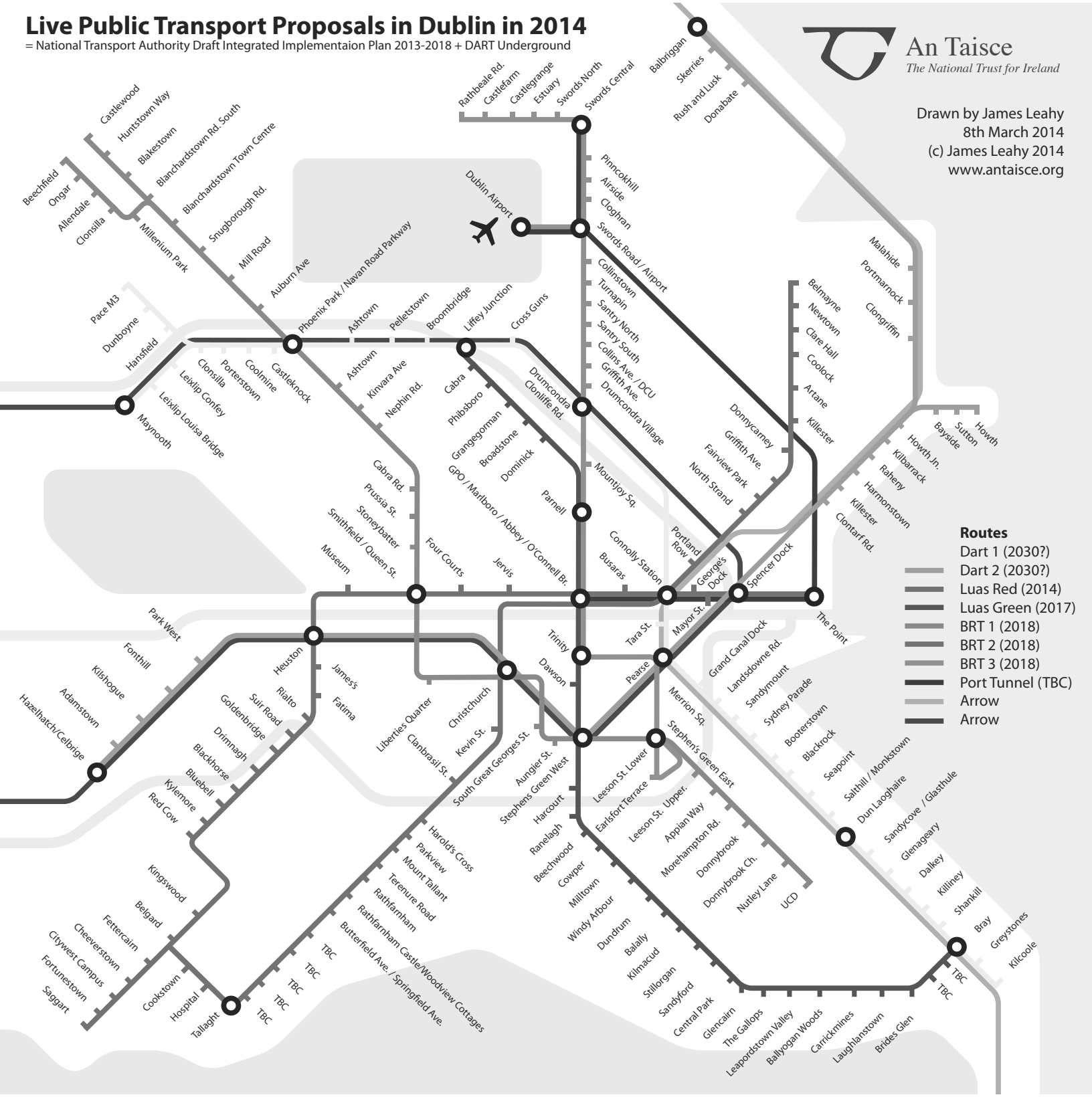
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With alternative DART arrangement and BRT Extensions assumed by An Taisce .



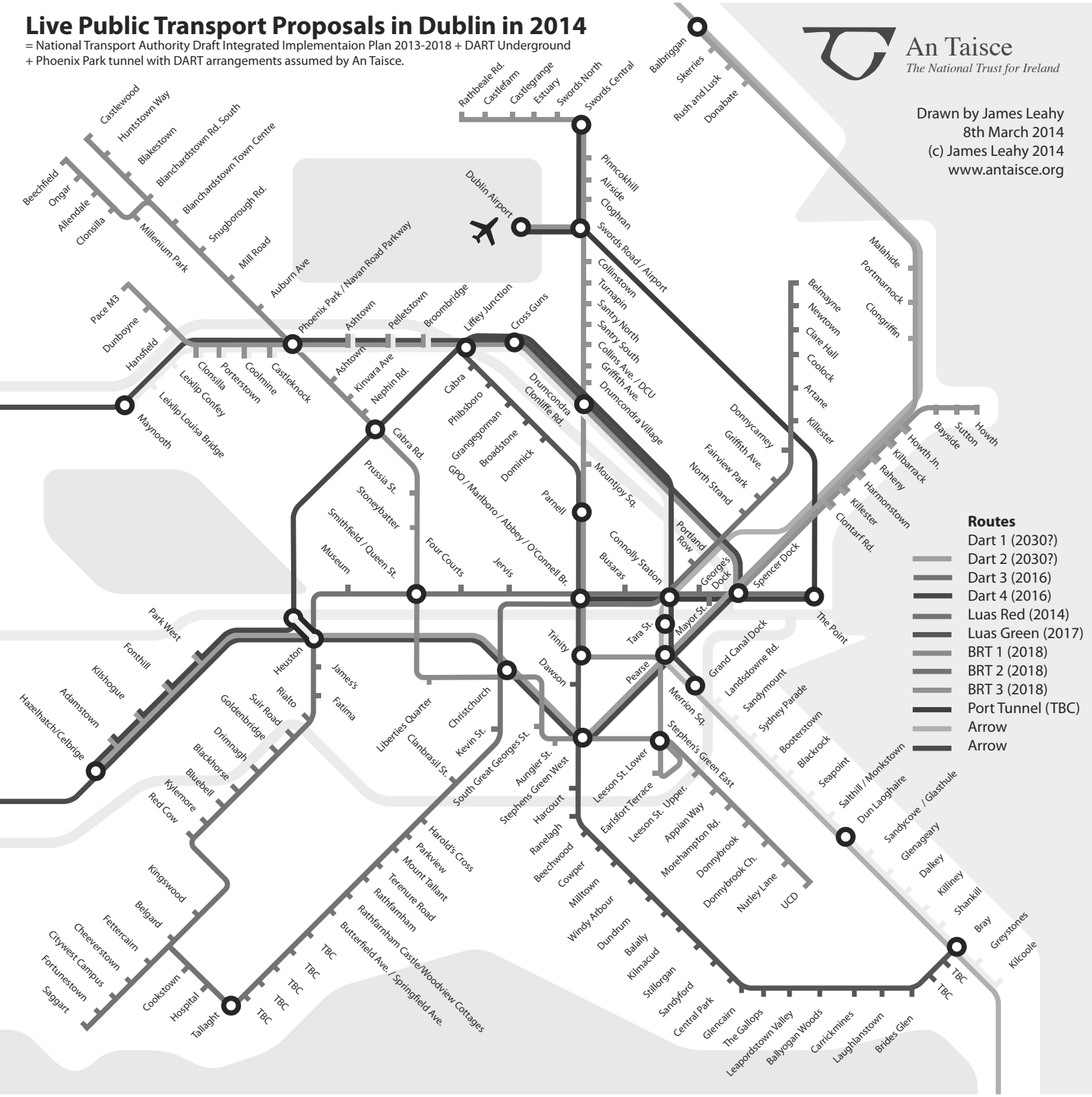
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority Draft Integrated Implementaion Plan 2013-2018 + DART Underground



Live Public Transport Proposals in Dublin in 2014

= National Transport Authority Draft Integrated Implementaion Plan 2013-2018 + DART Underground
+ Phoenix Park tunnel with DART arrangements assumed by An Taisce.



From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:49
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: BRTSubmission_AT_C.ie_DCC_FINAL__APPENDIX.pdf

From: Damien Ó Tuama
Organisation: An Taisce, Cyclist.ie and Dublin Cycling Campaign
Address: Tailor's Hall, Back Lane, Christchurch, Dublin 2.

Comments:
Dear Sir/Madam,

This document is a combined submission from three organisations working together: An Taisce, Cyclist.ie – The Irish Cycling Advocacy Network, and Dublin Cycling Campaign. We produced our submission collaboratively as thought it would be easier for the designers to consider all of the points when presented in one single coherent thread, rather than spread over three separate submissions (and involving duplication). I would be grateful if you can note the three separate organisations when listing the submissions received.

I would also be grateful if, in the interests of transparent government, the NTA could publish (online) all the submissions received.

Thank you.

Damien Ó Tuama
National Cycling Coordinator
damien.otuama@antaisce.org

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National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Friday, November 28, 2014

Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre

Dear Sir/Madam,

I am pleased to make a submission in respect to the above proposal. This submission has been jointly prepared by An Taisce (www.antaisce.org), Cyclist.ie – The Irish Cycling Advocacy Network (www.cyclist.ie) and Dublin Cycling Campaign (www.dublincycling.ie).

The submission comprises four main sections:
Section 1: Overarching Remarks / Standard Points Applying to Many Locations
Section 2: Comments on the General Planning of the Scheme
Section 3: Detailed Comments on Public Transport Aspects
Section 4: Specific points on a map-by-map basic with a particular focus on the perspectives of bicycle users
These are followed in the Appendices by schematic maps by An Taisce of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 including the Swords BRT.

Please excuse any formatting inconsistencies / typos etc. in this submission. It took considerable time to examine the voluminous material made available on your website: http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre/

Section 1: Overarching Remarks / Standard Points Applying to Many Locations

1.1 Dublin Cycling Campaign/Cyclist.ie/An Taisce, as indicated in our original submissions, are overall strongly in favour of the concept of BRT and in this case of the proposed BRT public transport preferred route between Swords and City Centre. We are of the view that the provision of high quality public transport and BRT is an essential strand to an efficient and more sustainable transport system where car commuting is de-prioritised. This imperative is all the more pressing as the scientific knowledge around the cumulative build-up of fossil-fuel based emissions crystallizes further – as set out, for example, in the latest publication of the Intergovernmental Panel on Climate Change (http://www.ipcc.ch/pdf/assessment-report/ar5/syr/SYR_AR5_SPMcorr1.pdf).

1.2 We commend the NTA and consultants in producing such a comprehensive and detailed report and route assessment process. We are particularly happy to see the inclusion of 'cycle network integration' as part of the Multi Criteria Analysis (MCA) approach, as outlined in the Route Options Assessment Report.

1.3 The present drawings which, as indicated, are 'subject to further development', contain a number of minor errors in presentation, which create a certain amount of confusion in determining the detail of what is actually proposed in a small number of areas. We look forward to perusing the final iteration of the drawings in order to comment fully.

1.4 We are conscious that the overall design must meet the requirements of the Roads Act, 1993, Sect 13.(5), which states: "In the performance of their functions under subsections (1) and (2), a road authority shall consider the needs of all road users". From our examination of the drawings and as elaborated below, it appears that at too many junctions and along some links, the cyclist is thought of as a 'pedestrian on wheels' rather than a user of a vehicle and this translates into very circuitous, convoluted and ultimately inadequate provision for cycling.

Junctions, Crossings and Shared Cyclist/Pedestrian Spaces

1.5 We have issues with virtually all of the junctions in relation to cycling and these need to be looked at in detail. The final proposed solutions need to be outlined clearly.

1.6 Four arm / complex junctions. On many/most of these junctions, especially north of the canal cordon, there are a number of serious short-comings. These include:

(a) Inadequate treatment for cyclists emerging from or travelling into local roads. It is totally inadequate for bicycle users to have to take right hand turns in 4-5 stages. See for example Map 9.
(b) For every junction, all right turn and straight-ahead movements need to be checked. In too many cases, these manoeuvres are far too convoluted and disjointed. It seems that it is only the left-turn manoeuvre for cyclists that appears to have been considered!

(c) Additionally, how is it proposed that these junctions will be signed for cyclists so as to

explain how they proceed straight-ahead or turn right? It is important to consider this in detail. If you imagine someone driving a car and approaching a complex junction: at a certain point the lanes are arranged to allow vehicles to go left/straight/right depending on the situation. There are clear and timely markings in the middle of the lanes and often signage explaining to vehicles how to negotiate the junction. At no stage is it expected that a car will stop in the middle of the junction to figure out what is going on or to make a u-turn. Now consider a cyclist approaching a similar junction. In many, if not most cases, it is not at all obvious to a cyclist how they can legally and safely make a right turn or even go straight on. If a cyclist is not familiar with the junction - or has not got a detailed engineering drawing with him/her - the information conveyed by the infrastructure will send the cyclists down the road to the left. This is unacceptable.

1.7 We are very much in favour of roundabout removals, as indicated in the Swords area and on R132, and their replacement by signalised junctions, as these are generally more receptive to safe use by cyclists and pedestrians. However, in too many cases, cyclists are simply shunted into shared spaces with pedestrians which contravenes the NTA's own guidance. Section 1.9 of the National Cycle Manual includes the following advice: "Shared facilities between pedestrians and cyclists generally result in reduced Quality of Service for both modes and should not be considered as a first option." (http://www.cyclemanual.ie/manual/thebasics/1-9-pedestrians-and-cyclists/). This advice is entirely consistent with the feedback we receive hear from the National Council for the Blind of Ireland. Please revisit all situations where (potentially fast moving commuting) cyclists are set the share space with pedestrians.

1.8 Where off-road cycle tracks are proposed, it is essential that there is a level difference with the footway. Shared cycle-pedestrians spaces are only acceptable (both for cyclists and pedestrians and especially mobility impaired pedestrians) in very low flow situations. This design feature is very common in the Northwest Swords area Map 2 particularly.

1.9 BRT/QBC passing a side road on the left. There needs to be design provision for car drivers turning left across BRT/QBC lane *and then across cycle-lane on the inside*. There is a serious safety issue here for cyclists. This repeats itself throughout the scheme.

1.10 When off-road cycle tracks are provided, it is unclear / not thought through how cyclists turn right off the off-road track to access developments on the opposite side of the road.

BRT and Other Vehicles

1.11 We are very unhappy with the proposals for cyclists in relation to crossing the Airport roundabout. The proposals as outlined are a particular deterrent to cyclists traveling north to south towards the city: cyclists will be required to make 4 separate crossings of these busy roads just to get through this junction. This junction design needs fresh thinking where cycling is concerned and we recommend that some form of high quality pedestrian/cyclist bridge is carefully considered.

1.12 It is not clear if there are due to be any longitudinal constraints on the BRT lanes at any stage to prevent interference and entry by other traffic. This is a not-uncommon feature

of other BRT systems. Clarity on proposals to restrict unwanted entry of 'other' vehicles into BRT lanes would be welcome.

1.13 Whether taxis are admitted to the BRT lanes needs to be reviewed on a case-by-case basis. Taxis can facilitate public transport trips and are very useful for people who do not have access to cars. However, if the volume of taxis in a bus lane gets to the point where the buses are being delayed then they frustrate the proper functioning of the system. Consideration needs to be given to the average occupancy of vehicles. For taxis it is low, especially given the number of taxis driving around waiting to pick up passengers. Meanwhile buses can efficiently carry large numbers of people. The Canal Cordon Counts of traffic into Dublin City centre show that efficient bus lanes into the city can carry very large numbers of people, to the extent that they can improve the situation in the general vehicle lanes as well. In particular taxis should be removed from many of the congested city centre bus lanes. When designing for taxis the question should be: Are passengers finding it difficult to find a taxi and what needs to be done about it?

Speeds and Places:

1.14 30km/hr. There are many parts of the route in which: (a) there is a very narrow cycle-lane on the inside of the BRT & Bus Lane, and/or (b) there are (multiple) left-turn movements across the cycle-lane, and/or (c) the cycle-lane is positioned on the outside (i.e. the right-side) of bus-stops and/or left-only lanes. Therefore, one can expect there to be weaving of one type or another across the paths that cyclists will be taking. For these weaving movements to occur safely, speeds need to be low. We strongly recommend that for all of the BRT route within the canal cordon area and for those other parts passing through narrow and/or pedestrian heavy corridors, that the speed limit is set as 30km/hr. We expect this will have minimal impact on journey times as bus speeds would rarely rise about 30 km/hr in these streets. This will also have a positive urban design impact in conjunction with good detailing of the infrastructure.

1.15 Consideration needs to be given, especially in city areas, to the reduction of entry/exit points on to the main route. The development of the BRT proposal needs to prioritise main route traffic flow and prioritise side entry/exit points in order to prioritise traffic along BRT route, increase safety for all road users, and reduce the level of 'rat running' by other vehicles, which are disruptive to residential areas.

Links / Other General Points

1.16 What is the legal position re cyclists using BRT lane?

1.17 It is proposed that blue painted cycle track at particular locations.

1.18 Buffer zones between (parallel) car parking / loading / taxi rank spaces and cycle track. There must be adequate width to take account of wider doors of Sports Utility Vehicles etc. Cycle tracks should never be positioned alongside parked vehicles. It is never appropriate to encourage cyclists to cycle in this position where they are vulnerable to being hit by opening doors.

Section 2: Comments on the General Planning of the Scheme

2.1 An Taisce made a submission in March 2014 on the initial consultation on the Swiftway system, which was strongly supportive of the proposals. http://www.antaisce.org/node/978

2.2 An Taisce also drew and published a series of schematic maps illustrating the potential of the various proposals in the National Transport Authority Draft Integrated Implementation Plan 2013-2018. See this press release: http://www.antaisce.org/node/366 and the maps in full in the appendix of this submission: http://www.antaisce.org/node/978

2.3 An Taisce is strongly supportive of the overall concept of Bus Rapid Transit for Dublin, of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 and of the SwiftWay proposals.

2.4 Detailed comments and constructive criticisms follow below. Here we will make some general comments.

2.5 If one goes back and reads the section on Quality Bus Corridor (QBC's) in the 1995 Dublin Transport Initiative report, there is a list of measures which were to be included in the QBC's. The list is very similar to the list in the current proposals, and what is generally considered Bus Rapid Transit.

2.6 Since 1995 there has been much debate about Bus Rapid Transit, QBC's and Light Rail Transit, both nationally and internationally. The concept of Bus Rapid Transit has become widely known among transport policymakers. The Luas in Dublin has been a striking success with the public and has changed the perception of what public transport can be, among a large sector of the population. The QBC's have been a mixed success. Where good priority and frequency were delivered there has been a large shift from private car use to bus use e.g. the Stillorgan, Malahide and Lucan QBC's. Other QBC's have been less successful. Many of the other high quality customer experience elements of the DTI proposals have not been delivered.

2.7 The conclusion that should be drawn is not that the QBC's have failed, but that they have been a partial success due to their partial implementation. What is needed now is to use the Luas as a local benchmark of quality, and to use international experience of BRT, to upgrade the QBC's to the same level of quality as Luas. The SwiftWay proposal will do this if done correctly.

2.8 It should also be noted that much has been achieved since 1995, which will make SwiftWay a lot easier to deliver compared, for example, to what a typical British city might face. E.g.

- Significant priority has already been claimed for QBC's especially on this Swords QBC route.
- We now have the Leap Card integrated ticket.
- We have a National Transport Authority to deliver integrated transport.

- We have built up considerable local skills thought the RPA and QBN Office.
- We have the Automatic Vehicle Location system and a control centre to manage public transport and traffic.
- The College Green busgate
- The Marlborough Street bridge.
- An Integrated Journey Planner and the Google Maps planner.

The missing pieces of the jigsaw are:

- Integrated branding for urban public transport
- Integrated information and mapping for public transport
- High quality vehicles
- High quality public transport interchanges.
- Good running surfaces
- Signal priority in certain areas.

Long Term Potential of BRT

2.9 Dublin has expanded massively over the last generation into a sprawling low density city. We will never provide an integrated Paris Metro public transport system across the entire city using rail due to the size and density of the area to be served.

2.10 It is crucial to deploy our investment as widely as possible and to provide an integrated network. An Taisce has illustrated this network effect in the maps in the Appendix. It can be seen that the SwiftWay and Phoenix Park tunnel projects can for the first time provide a significant integrated network of public transport services across the city. It can be seen how many potential trips could be made by making only one transfer.

2.11 Suggestions have been made in some of the maps in the Appendices for improved integration. Other maps also illustrate the long-term benefits of the Dart Underground proposals.

2.12 Another benefit of the BRT proposals is that they can be deployed quickly. If they are successful, as they have been elsewhere, a debate can be held about extending them to other areas such as Ballymun, Coolock, Finglas and Lucan. See the maps produced here by Aris Venetikidis for the longterm potential: http://www.venetikidis.com/ArisV/DUBLIN_TRANSPORT_MAP.html

Comments on Capacity

2.13 The comments on capacity, that BRT is a mode that fits in between conventional bus and Light Rail Transport, are not valid. International guidance and examples show that BRT can provide the same capacity as Light Rail Transit. There are a variety of criteria for why one might choose between Light Rail Transit and Bus Rapid Transit. It is not a case of deciding the capacity that is required and then selecting the mode. The existing QBC's such as the Malahide, Lucan and UCD ones, have an actual delivered capacity of up to 8000 passengers per direction per hour (i.e. buses with capacities of 91 or 125 at 60 to 120 buses per hour.).

Environmental Concerns

2.14 As noted there are a variety of options for propulsion of the vehicles. Wrightbus in Ballymena manufacture efficient diesel hybrid buses. The Cristalis trolleybus BRT system from Lyon is also an option. When considering the environmental benefits it is important to consider the potential reduction in car use. E.g. A BRT system with diesel buses will still deliver a reduction in local and overall emissions due to the reduction in private car use. Furthermore the lower cost of BRT means that more if it can be deployed. The potential for emissions reduction per euro of investment should be considered.

Section 3: Detailed Comments on Public Transport Aspects

Welcome for the scale of the investment

3.1 An Taisce strongly welcomes the improvement in provision for buses that these proposals represent. They should be able to deliver a proper Bus Rapid Transit service rather than just some sort of super-QBC. In particular we welcome:

(a) The decision to provide continuous high quality infrastructure and to address pinch points through road widening, land purchase, bridge reconstruction and significant construction. In the past QBC's were often limited to working within the existing roadway leading to significant comprimises.

(b) The reallocation of general traffic lanes to bus lanes and the creation of bus only streets in the city centre.

(c) The rationalising of lane widths for all lanes along the route. The consideration of urban design in the City Centre.

The Dublin Port Tunnel Bus Services

3.2 The bus services through the Dublin Port Tunnel from Swords and the Airport will remain attractive for many passengers. They may serve different areas, provide a better door-to-door journey time or provide a better chance of getting a seat. Both should compliment each other. The branding of these Port Tunnel services should be considered in the delivery of the Swiftway to Swords. At BRT platforms in Swords and the Airport there should be clear information on the different options passengers have.

Enforcement of Bus Lanes

3.3 The BRT lanes in the centre of the Swords bypass are a welcome innovation. Where kerb lane BRT lanes are provided: General traffic should not be allowed enter the BRT lane beyond the junction at all. Before the junction all general traffic should generally be excluded. If traffic is allowed in, it should only be left-turning traffic. Traffic going straight-on should not be allowed in as is the present arrangement on many QBC's.

3.4 Consideration should be given to concrete, plastic or rubber physical separators to exclude general traffic.

3.5 The legislation should be amended to allow for enforcement cameras on the front of buses. If they encounter a vehicle illegally in the bus lane they should record this

allowing a fine to be posted out. This would be fair and efficient as, by definition, the illegal car would be delaying the bus.

Bendy Buses

3.6 There appears to be a prejudice against bendy-buses in the London based media. These are run successfully in many places across the world and can be designed to work in Dublin.

3.7 The trial of bendy buses on the No. 4 a few years ago was doomed to fail from the start due to the use of bendy buses with only a single door.

3.8 In the section on cycling we have made detailed comments about bike-bus interaction.

Urban Design

3.9 There is a need to consider a wider range of criteria when designing the system that narrow transport considerations. The routes will run along key urban corridors. For Dublin to be an attractive and competitive city for citizens and investors, we need to design streets that are beautiful and that consider all uses.

3.10 The Line 4 BRT route in Nantes is a leading international example. The design of the Luas on Harcourt Street and the Luas Red line through the City Centre are also good local examples.

3.11 The new Irish Design Manual for Urban Roads and Streets is excellent and should also be used: http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownLoad,32670,en.pdf

3.12 A good reference on integrating BRT into urban streets is the CERTU report on Bus with a High Level of Service (BHLS). It explains the need to provide a façade to façade urban design treatment. http://www.uitp-bhls.eu or available on request from secretary@antaisce.org

Branding

3.13 The SwiftWay branding and graphic design looks weak.

3.14 We already have good and respected brand for this type of service with the Luas brand. This brand should be used for the BRT routes too. The Luas level of quality should be used as a benchmark in delivering a similar level of quality for the BRT routes.

3.15 There is also a need to rationalise and integrate branding of public transport generally in Dublin. London has Cross Rail, Underground and bus. Paris has RER, Metro and Bus. Germany has S-Bahn, U-Bahn and Bus. Spain has Cercanias, Metro and Bus. Ireland should follow this good practice. We should have a hierarchy of services based on the passenger experience not the operator or mode. We should brand the network around a hierarchy of three levels of service: DART, Luas and Bus.
(a) DART: Covers longer distances with greater station spacing with high capacity and a minimum frequency of 4 services per hour. Can be electrified or diesel trains or possibly an express Airport bus service through the Dublin Port Tunnel.
(b) Luas: Serves urban area of Dublin with medium sized distances and stop spacing

and a minimum frequeny of 6 services per hour. E.g. the existing Luas Light Rail services and the proposed BRT services.
(c) Bus: The remaining bus services which compliment Dart and Luas. See the maps by Aris Venetikidis to see how this might look in practice.
http://www.venetikidis.com/ArisV/DUBLIN_TRANSPORT_MAP.html

Points to Consider in the Detailed Design for Part 8

3.16 The detailed design for the Part 8 Planning Application should consider the following points.

3.17 Branding and mapping. A map of high quality public transport including DART Luas and Swiftway must be produced and used. It is pointless displaying maps of independent DART, LUAS and Swiftway systems on each individual service. What the passenger needs is an integrated transport system.

3.18 The detailed design must address signage for integration with other high quality public transport services. e.g. with the train at Drumcondra and the Luas in the City Centre. There needs to be clear information for people getting off a Luas or Swiftway on the platform to guide them to the platform of the next service they wish to get. This will be difficult to design in the O'Connell St. / Abbey Street area but is very important. See for example the new Barcelona Bus Network http://www.tmb.cat/en/nova-xarxa-de-bus where there is information and signage on the footpath to guide passengers from one stop to the next.

3.19 From Parnell Square to Earlsfort Terrace the Swiftway goes through some of Dublin's set-piece urban spaces such as O'Connell Street, Parnell Square, Merrion Square and St. Stephen's Green. A high level of detail will be required for the Part 8 application to demonstrate how these spaces will work as urban places, including street furniture and paving layouts and materials.

Section 4. Specific points

Map 19

- Leeson Street and Earlsfort Terrace
  - As per sections A-A and BB, cycle-lanes of a width of 1.2m are far too narrow. As the designers may well be aware, the research of Parkin & Meyers (2010) showed that drivers pass more closely to cyclists within narrow cycle lanes than to those cyclists on roads without narrow cycle lanes. Such narrow lanes are at best pointless and at worst dangerous. See Earlsfort Terrace point below.
- The Leeson Street / Stephen's Green junction is still hostile for cycling as per these designs. More specifically:
  - The (intimidating for many) right hand turn from Leeson Street onto Stephen's Green West remains the same. this is an opportunity to address this issue

- The provision of a straight ahead eastbound cycle lane from Stephens Green South on to Leeson St is already part of the Stephens Green East scheme yet to be completed fully. This has not been included on this drawing and should be.

- Earlsfort Terrace
  - The National Concert Hall is one of the main cultural institutions in the city, and before and after events, concert goers drift back and forth across the street to the hotel and bar across the road. Surely there is an opportunity here to redefine Earlsfort Terrace as a place – and an attractive public space using high quality materials? As with the existing designs, the street is very much 'channelised' into a series of corridors defined by lines and signs. This represents a lost opportunity.
- Earlsfort Terrace/Hatch st

We note no specific provision for BRT along Hatch Street, and query the viability of the movement from Earlsfort Terrace into Hatch St. Is this feasible with large BRT vehicles?

- Merrion Row.
  - The footways on this street are of an excessively narrow width and have been for decades. The effective width is even narrower given the presence of bollards. Surely this is an opportunity to widen the paths.
  - A contra-flow cycle track on this street linking back as far as Baggot Street Lower is really needed here.
- Merrion Square West

o We do not understand why the nose-to-kerb car parking directly adjacent to the southbound cycle track is retained, as from the drawings it would appear that access to traffic other than public transport and bikes is forbidden.. Surely this is the time to move this parking – and the drawings show extra proposed parking on Merrion St Upper and there is ample parking on the other sides of Merrion Square.

- Merrion Street Lower / Lincoln PlaceWe are happy with the provision of a northbound contra-flow cycle track on Merrion St. Lower, but provision for entry into rear of Trinity College should be included we are concerned about the utility of an off-road cycle track takes a tight (LH) turn onto Lincoln Place - do we want this last piece in!!?
  - LH turn from Westland Row onto M.St. Lower. It is a really bad idea to position a cycle track on the LHS of a tight left turn here. The safer manoeuvre here is for the cyclist to take the lane; otherwise they risk being crushed.
- Leinster Street
  - We strongly endorse the proposal to run a contraflow cycle lane Westwards to link with Nassau Street (and on to Suffolk Street)

Map 18

- Westland Row
  - As per the designs, no northbound cycle lane is shown, even though this is a priority Cycle Route 13 in proposed GDA cycle network; cyclists, it is assumed, will share the BRT & bus lane. It is recommended that the speed limit on this street is set at 30kph.

  There is no p
- Lombard Street

- o We strongly endorse the proposal to run a northbound contraflow cycle track along Lombard St. However, the plans need to be clear on a route for cyclists coming from Westland Row northbound to enter Lombard St. This needs to be addressed. We also suggest that thehis northbound route be extended to Liffey.
- o Similarly the contraflow track needs to continue northwards onto the quays

- Pearse Street
  - o Westbound. Given the proximity of this route to Trinity College Dublin and the nearby Dublin Bikes station, it is preferable that a wide (2.5m +) cycle track is provided here to allow for cyclists of mixed abilities to over-take each other. There is adequate width available from building to building to cater for this proposal.
  - o Eastbound. We strongly endorse the proposal to have an eastbound contraflow cycle lane. However, the tie-in with the D'Olier Street cycle-lane needs to be re-examined/configured. Additionally, the contra-flow cycle track on Pearse Street needs to be extended southbound along the rest of Pearse Street towards Ringsend Road

  We note proposed repositioning of pedestrian crossing on Pearse St close to Shaw Street and wonder why!?
- College Street

o While appreciating that the BRT route does not extend beyond the College Green area , we feel it is incumbent to indicate how the prioritised Cycle Routes 7 & 11 in the GDA Cycle Network, will link in with Dame St/Nassau St It is unclear from Map 18 what is proposed at the junction of College Street and Westmoreland Street. How is it proposed that bicycle users will continue onto College Green (and then onto Dame Street and Grafton Street)? This is too crucial a junction to be left unresolved!

- D'Olier Street/College St/Westmoreland St

We strongly endorse the general proposals for this area. The proposals should greatly improve these areas as public spaces. But, we recommend that the complex junction at CollegeSt/Townsend St be given a clear 'Visualisation' to enable clarity of interpretation. We also suggest that provision be included for cycling to and from Hawkins St.

- o We strongly endorse the proposal to rationalise the space on Dolier St so that there is only one remaining Shared Bus & Traffic Lane. We are concerned however with the design detail, traffic signalling and positioning of the cycle-lane to the left of the BRT & Bus Lane when, presumably, buses will be turning left onto Townsend Street

- Westmoreland Street
  - o It appears as if the proposed off-road cycle track is two-way. The drawings need to show the tie-ins with other tracks more clearly.

Map 17

-
- O'Connell Street

o We note O Connell St plans for cyclists are still to be developed, but also note present plans show no provision for northbound cyclists between O Connell bridge and Henry St Northbound. Plan for cyclists?

- o Southbound. Proposals for cyclists to access Westmoreland St 2 way cycle track from O Connell St should be clarified

- Parnell St and Marlborough St, while not prioritised in the GDA Cycle Network, should be referenced as potential 'low traffic' cycle routes and designs incorporated to faciliate cycle movement avopiding thje busy O Connell St both in north and south directions
- Parnell Square East
    - Northbound. We warmly welcome the provision of a northbound cycle-lane to link with North Frederick Street. We also support the design element of having a cycle track behind the bus-stop. This will work well on the incline as the speeds of cyclists will be low/moderate.

    The proposal as outlined for a 'shared lane' northbound on Parnell Square east needs to be clarified. Is this to include ALL traffic as it would appear!? We are not in favour of 'other' traffic in this area, as it will critically affect BRT and public transport performance.

    - Re: the idea of having the cycle track behind the bus-stop on the southbound direction, we are cautious about the idea of fast-moving cyclists interacting with embarking/disembarking bus passengers here. The detail needs to be right here.

Map 16

- Consider reduction in side entry/exit routes to increase main route traffic flows, improve safety for all road users, and reduce 'rat running' traffic levels.

we note provision at Binn's Bridge for proposed Royal canal cycle route crossing

- North Frederick Street
    - Outbound. Adequate buffer between parking/loading/taxi bay and cycle track?
    - Inbound provision for cyclists between Dorset St and Hardwicke St on N Frederick St needs to be clear as this is also part of GDA Network cycle route 3
- Dorset Street Lower
    - Outbound. Concern that a (narrow) cycle-lane is positioned on the inside of the BRT & Bus Lane and that there are multiple side roads into which cars will be turning. From a Bikeabilty perspective, the cyclist would be safer cycling in the middle of a narrow combined bus and cycle lane.
    - Both cycle lane and BRT lane widths are sacrificed on part of this route (see Section CC) - this design needs to be revisited, favouring sustainable transport options, possibly at the expense of reducing pathway widths and placing public lighting on buildings rather than lamp standards!?

Map 15 (Drumcondra)

- Drumcondra (Tolka River) Bridge
    - Outbound. There is conflict between visualisation diagram and outline plan drawing. If Shared space between pedestrians and cyclists is proposed as in Visualisation it puts both parties at risk. Additionally, the north end of the cycle track brings cyclists back onto the carriageway at the point where vehicles turn left. POTENTIALLY VERY DANGEROUS.

    - Inbound. Cycle lane alongside BRT & Bus Lane looks very narrow. See general point above.
- Upper Drumcondra Road
    - Staggered pedestrian crossing. A single stage crossing would treat pedestrians with more dignity rather than treating them like sheep!
    - Outbound. Outside St. Patrick's College, is the cycle lane part of the BRT platform?
    - Inbound. Junction with Richmond Road. Again, cyclists are being positioned in a less-than-ideal situation with respect to left turners into Richmond Road. This need revisiting.
- Lower Drumcondra Road
- The proposed cycle tracks appear to mirror existing routes. Many seasoned cyclists stay on main road at this location due to poor quality of cycle track and the number of junctions to be negotiated, where present priority is for exiting motor vehicles. The priority for cyclists needs to be clear from all directions!
- The longitudinal profile of the cycle tracks in both directions on this section needs to be improved, particularly at crossings of minor roads. The present profile is one of the reasons why many cyclists remain on the main road. There is also an opportunity to improve the relatively steep entry to the southbound cycle track by relocating the entry point from Drumcondra Road Lower to a point further northwards.
- This section as in many others along the proposed route needs to give consideration to closing off a number of side road entry/exit points, and developing alternative traffic flows. the side road incursions, while necessary at some points are disruptive of main route flow, and need to be prioritised

Map 14 (Drumcondra / Griffith Avenue)

- Outbound
    - Junction with Wellpark Avenue. Left-turn conflict with straight-ahead cyclists - need to be clear on priority.
- Inbound
    - Junction with Griffith Avenue. Left-turn conflict with straight-ahead cyclists - need to be clear on priority.

  major issues again with cycle options at Griffith, especially for right turners, and also for straight ahead priority, both on main route and East-West legs

Map 12 (Whitehall)

- Swords Road / Collins Avenue Junction
    - The same issues in relation to shared facilities occur again
    - major issues again with cycle options at all junctions especially for right turners, and also for straight ahead priority
    - Cyclists mixed with pedestrians here. Not satisfactory.
    - How is it proposed that inbound cyclists on the Swords Road turn right onto Collins Avenue?

    - How is it proposed that eastbound cyclists on Collins Avenue (Whitehall side) turn right onto Swords Road to head inbound?
    - Particular difficulty with cyclists travelling from old Swords Road towards City and how it is proposed that they negotiate this junction
    - No idication of west-east or east-west cycle orovision on Collins Avenue
- Swords Road/Shantalla Road Junction design needs a full revamp to take account of Priority Cycle Route 2A from Swords to City Centre. Design shown on Map 12 is unclear in realtion to priority. Consideration should also be given to close off minor roads to motor traffic at this junction

Maps 11 and 13 (Coolock Lane/Santry)
We assume that proper priority will be given to BRT crossing on Coolock Lane and at Swords Road junction
The same issues in relation to shared facilities occur again
major issues again with cycle options at all junctions especially for right turners, and also for straight ahead priority
While we appreciate that the proposed cycle routing through Santry village is not on the direct route of the proposed BRT, we are very disappointed with the marginal changes proposed through this area, shown on Map 13. This is not in keeping with the stated aims in the Route Options Report Section 2.7, to provide...'cycle infrastructure to the appropriate level and quality of service (as defined by the NTA National Cycle Manual) required for a primary cycle route', nor for what is proposed as major Cycle Route 2A in GDA Cycle Network.

- Outbound
    - Left turn slip lane into Omni Park creates a difficult zone for cyclists. Not recommended as per Cycle Manual: "Slip lanes often give drivers an unreasonable sense of priority, and by virtue of their oblique geometry, they restrict views of cyclists and pedestrians. They should be removed wherever possible." (http://www.cyclemanual.ie/manual/designing/4-5-left-turns/)
    - Crossing of Santry Avenue. It would be advantageous to run large cycle logos across the junctions here - i.e. to link with cycle/bus lane on other side of junction.
- Swords Road / Coolock Lane junction. Provision for cyclists is totally inadequate here. Cyclists appear to be given the crumbs at the table here and are mixed with pedestrians. How is the right turn from Coolock Lane onto Swords for cyclists supposed to work?We would hope that this is not indicative of the standards proposed for Route 2A as outlined in the final GDA Cycle Network Plan!?

Map 10 (Santry Lane / Turnapin)

- South of Santry River (on both sides of the road)
    - Cyclists mixed with pedestrians on a shared surface. This is inadvisable on a commuting route where cyclists will be travelling at speed, and it should be possible to extend the land take on Morton Stadium side to enable full separate provision..
- Turnapin Lane junction
    - Need to avoid mixing cyclists and pedestrians here as well [CHECK GRADIENTS HERE. SPEEDS WILL BE HIGH IF THIS IS DOWNHILL]

Map 09 (Dardistown)

- Junction of Swords Road and Collinstown. The design of this junction needs to be revisited. Cyclists appear to be an after-thought, sharing with pedestrians and losing priority for many movements. More specifically:
    - Provision for northbound cyclists along Swords Road across this junction is too fragmented and discontinuous.
    - Right turn for cyclists from Collinstown onto Swords Road inbound. How does this work?
    - Similarly right turn for cyclists coming from airport on to Collinstown Road

Map 08

- Inbound and outbound. Shared space between (potentially very fast moving) cyclists and pedestrians is unsatisfactory. - this section has just been recently completed as laid out on this drawing. It is essentially no change to the existing situation, which has been praised in a number of quarters!
- Junction of Swords Road and South Corballis (airport entrance) Road. There is terrible service here for cyclists:
    - On every arm of the junction it appears to be assumed that all cyclists turn left! What about (i) straight-ahead manoeuvres and (ii) right hand-turns?! This need to be catered for properly.
- North of South Corballis(Airport Entrance) Road going outbound, heading northwards
    - This provides a very low level of service for cyclists through sharing space with pedestrians and losing priority at six entrances. This is not of a standard consistent with the new cycle manual!
    - It is completely unclear how cyclists will turn right off this 'facility' - turn right to where!!?? - there are no options
- Junction opposite 'Kealy's'.
    - Conflicts / loss of priority for southbound (staight-ahead) cyclists with left-turners. This needs to be revisited. - this at present is a dead end entrance with no activity….but point taken

Map 07 (Airport Roundabout / Cloughran)

- Airport Roundabout
    - North, East and South arms. It is assumed that these will be signalled to provide priority for BRT? - this roundabout is already a signalled roundabout. Are you just making a GENERAL point here as it should be assumed that ALL junctions will give priority!?
    - As mentioned above under 'General Points', the cycle provision at the main Airport Roundabout is unacceptable and will not lead to increased cycling along this route due to the complexity of movements required when heading towards the city. This junction requires a radical solution.
- Clonshaugh Road junction
    - We welcome the conversion of the roundabout to a signallised crossing.
    - However, it is still slightly unclear how each of the right-turn manoeuvres for cyclists will take place. There appears to be little right-turn pockets to support two-stage crossings. Will these be supported by dedicated cycle signals to

enable cyclists to move ahead of the traffic which is behind them (some of which might be turning left)

Map 06

- Two-way cycle track on East side of road. We are uneasy about the provision of two-way cycle tracks alongside roads where there are adjacent developments or side-roads, given that drivers exiting these places may not expect to see cyclists.
- Outbound. Cycle provision outside of Texaco. Given the geometry of entrances to the petrol station here, there is a high risk of conflict with straight-ahead moving cyclists. The design here is totally inadequate to meet the five needs of cyclists: road safety, coherence, directness, attractiveness and comfort - as stressed in the NTA Cycle Manual (http://www.cyclemanual.ie/manual/thebasics/fiveneeds/)
- Dublin Road / Boroimhe Road / Airside four armed-junction and approaches to the junction.
    - See standard point above.
    - Shared space with pedestrians on a commuter cycling route is not satisfactory
    - Both straight-ahead and right turn movement for cyclists are convoluted. They also involve the cyclist interchanging between being a cyclists and pedestrians-on-wheels.

Map 05 to Map 03

1 We fail to understand in the context of the overall design why no cycling provision is proposed along the R132 between the Estuary and Pinnock Hill roundabouts, despite the explanation in Section 3.4.3 of the Options Assessment Report. The R132 is the most obviously direct route from North Swords & North Dublin to the airport and city centre, and there is adequate width to enable cycling provision to be accommodated.

- Pinnock Hill Roundabout/junction
    - We welcome the conversion of the roundabout to a signallised crossing.
    - However, provision for cyclists at this reconfigured junction is still VERY poor.
        - While there are four general traffic lanes plus the BRT lane on the southern approach arm to the junction, cyclists are lumped in with pedestrians and forced to take a convoluted route simply to continue through the junction. This is the type of design we came to expect 15 years ago, but not in 2014! This needs revisiting. Cyclists are not pedestrians whenever a junction appears!
        - All other arms and manoeuvres need to be ‘proofed’ from a bicycle perspective.
- North of junction, what happens to cyclists?!

Map 04

- Junction with Malahide Road
    - While we welcome the conversion of the roundabout to a signallised four armed junction, the proposed design still looks like it represents an incredibly intimidating space for cyclists. By providing so many lanes of traffic(left-only,

straight-ahead, right-only) on the approach to the junction, this has the effect of creating a very long crossing distance for cyclists using the Malahide Road. Even for pedestrians (and especially elderly or more mobility impaired pedestrians) walking across four lanes of traffic to reach the BRT stop will feel intimidating. In the context of ultimately seeking to reduce car trips, these types of designs where so much provision is made for cars need to be phased out.

- Junction with Seatown
    - Similar comments to previous points above apply.

  The cycling links at the Seatown Junction (Map 4) on the R132 need to link in with plans being developed for the Sutton to Swords cycling route, and should indicate these potential links, as this route is likely to be quite busy and used for leisure cycling once developed.
    -

Map 03

- Castlegrange Road / R132 junction.
    - There is inadequate clarity as to how cyclists are to cross the R132, say, to travel from Castlegrange Road to Newcourt Road (? i.e. the road off which Newcourt links). Sharing with pedestrians is not satisfactory. Cyclists are road users not pedestrians! PLEASE STOP TREATING CYCLISTS AS PEDESTRIANS WHEN THEY REACH JUNCTIONS.
- Balheary Road crossroads.
    - Once again cyclists are turned into pedestrians at junctions. This is not satisfactory.
    - How are cyclists to go straight and turn right for each movement through the junction? Clearly this has not been addressed.

Map 02

- West end of scheme
    - Again, the cyclist is assumed to be a pedestrian on wheels. Not satisfactory.

Map 01

- For various stretches on the westbound and eastbound directions, it is unclear / not thought through how cyclists turn right off the off-road track to access developments on the opposite side of the road.

We trust you find the above comments helpful as the scheme advances to the next stage. We look forward to seeing the next iteration of design drawing.

Yours faithfully,

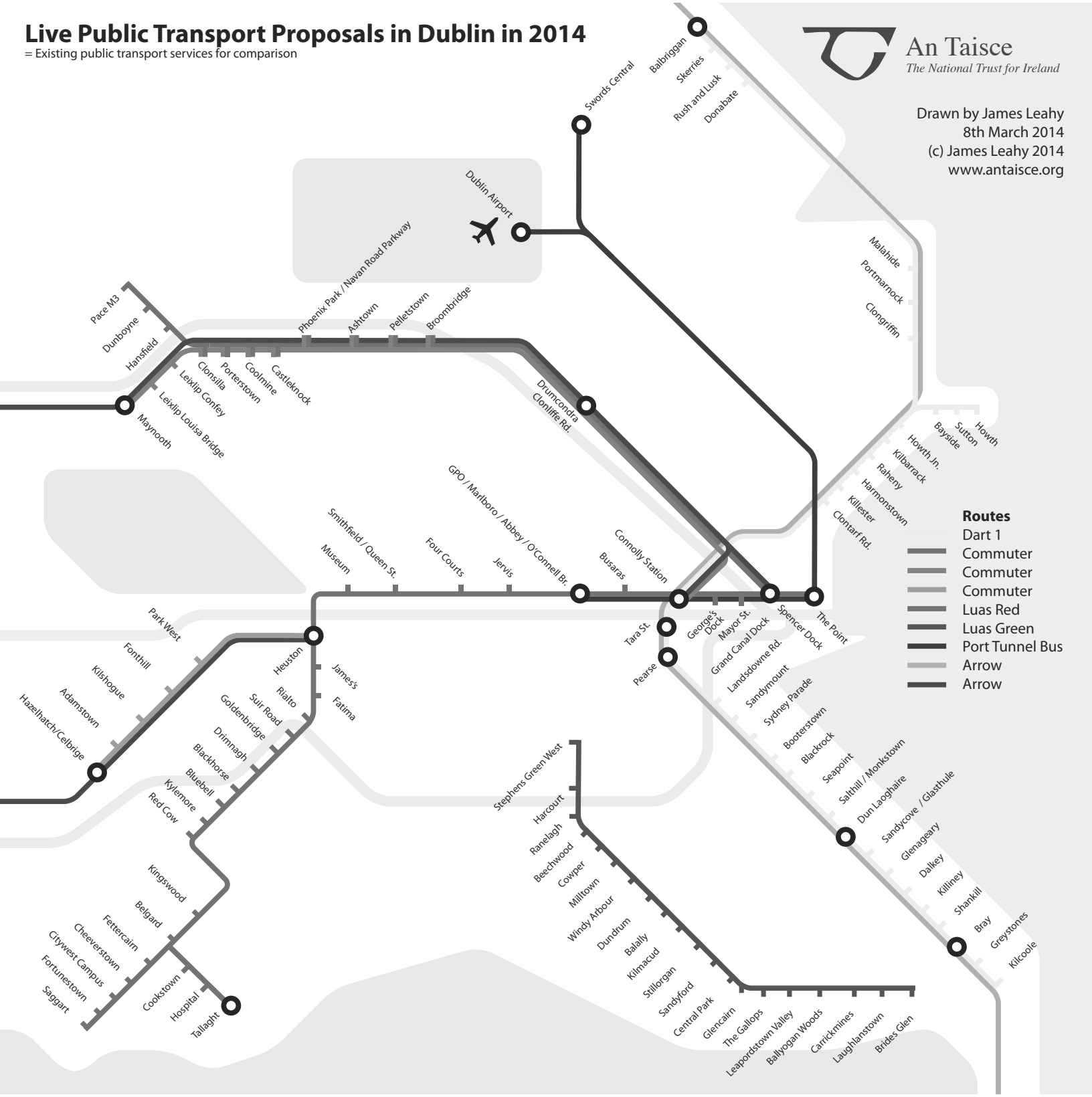
Damien Ó Tuama
National Cycling Coordinator – Cyclist.ie / An Taisce

APPENDIX

Schematic maps by An Taisce of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 including the Swords BRT.

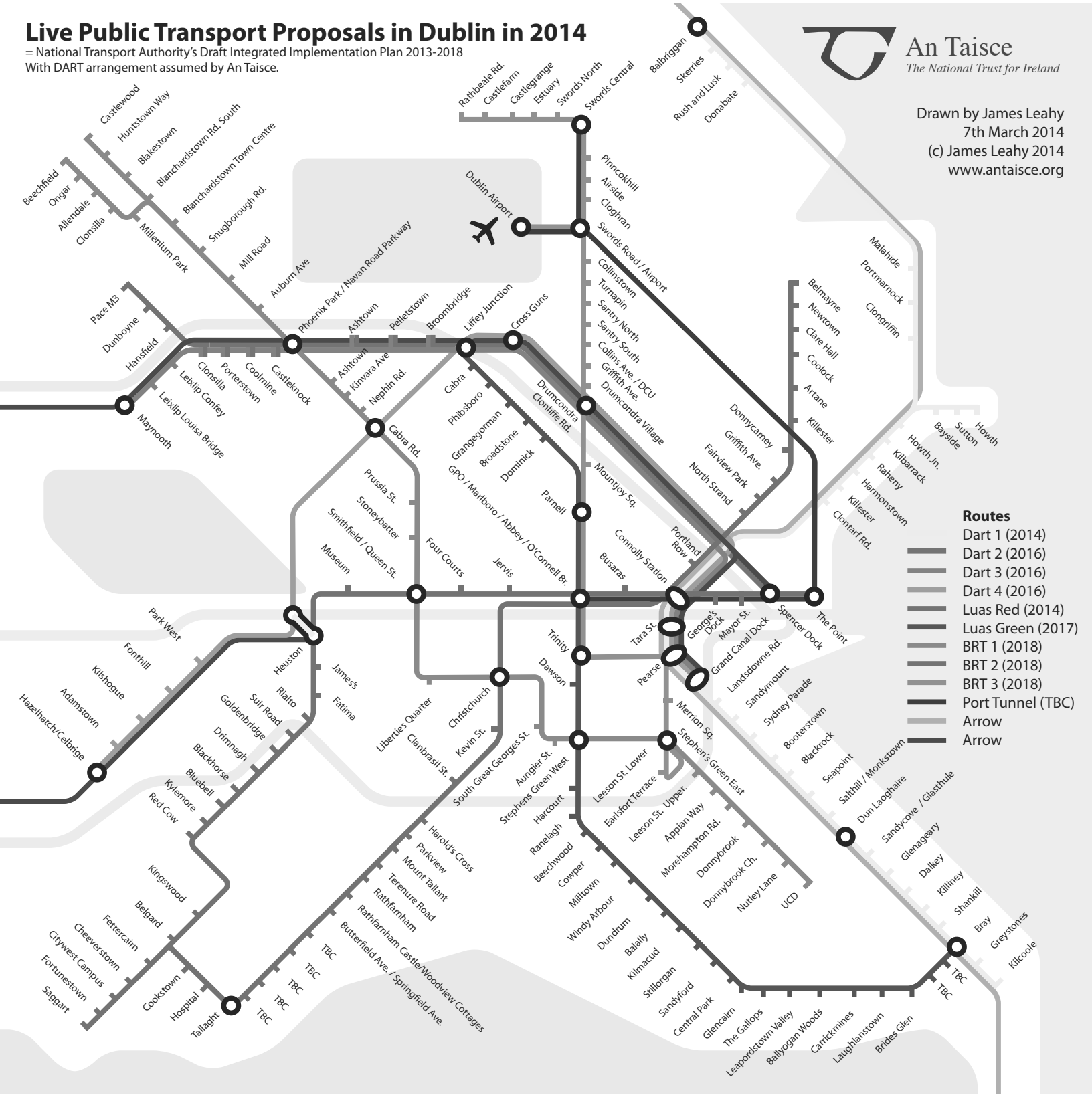
Live Public Transport Proposals in Dublin in 2014

= Existing public transport services for comparison



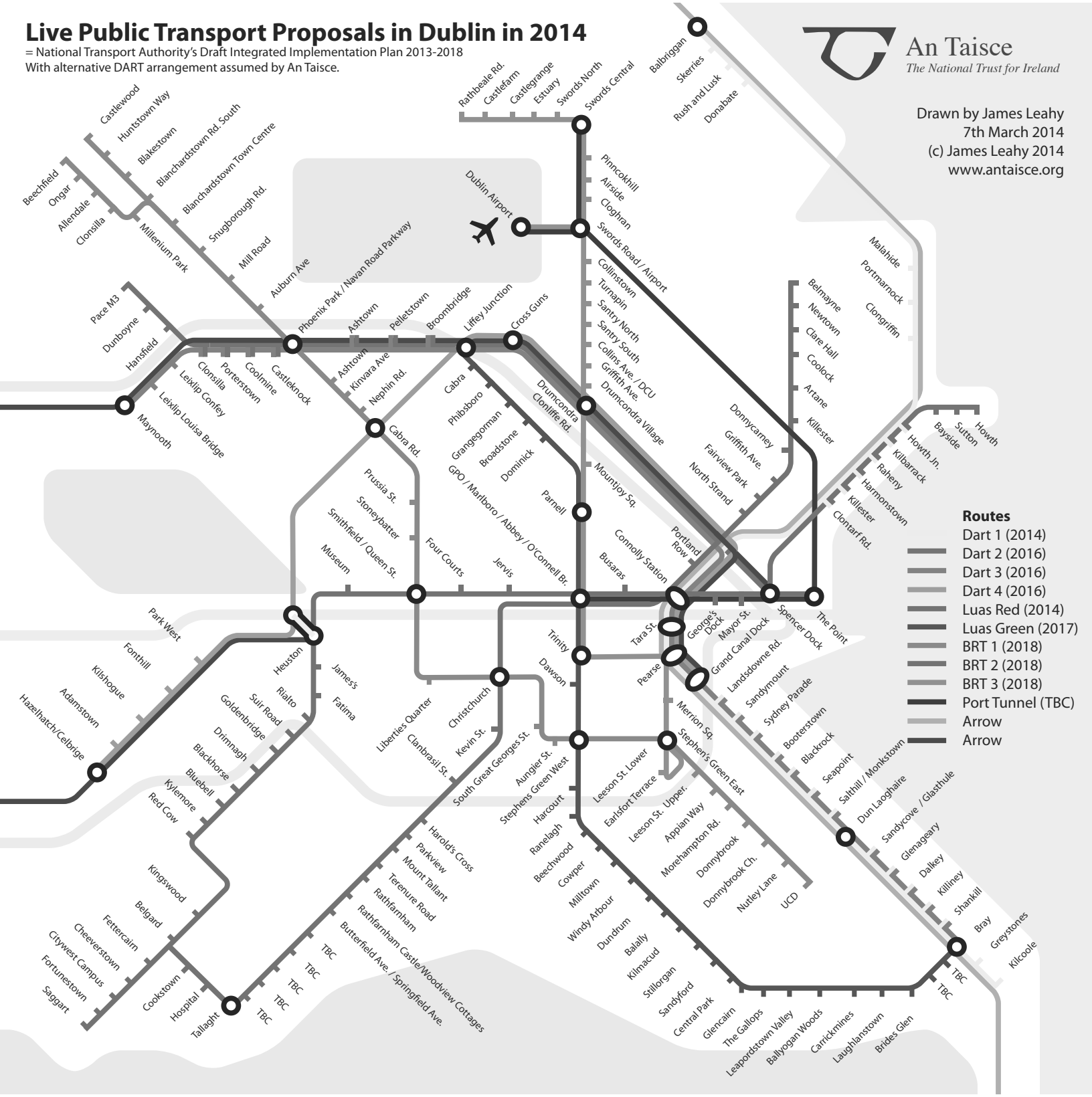
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With DART arrangement assumed by An Taisce.



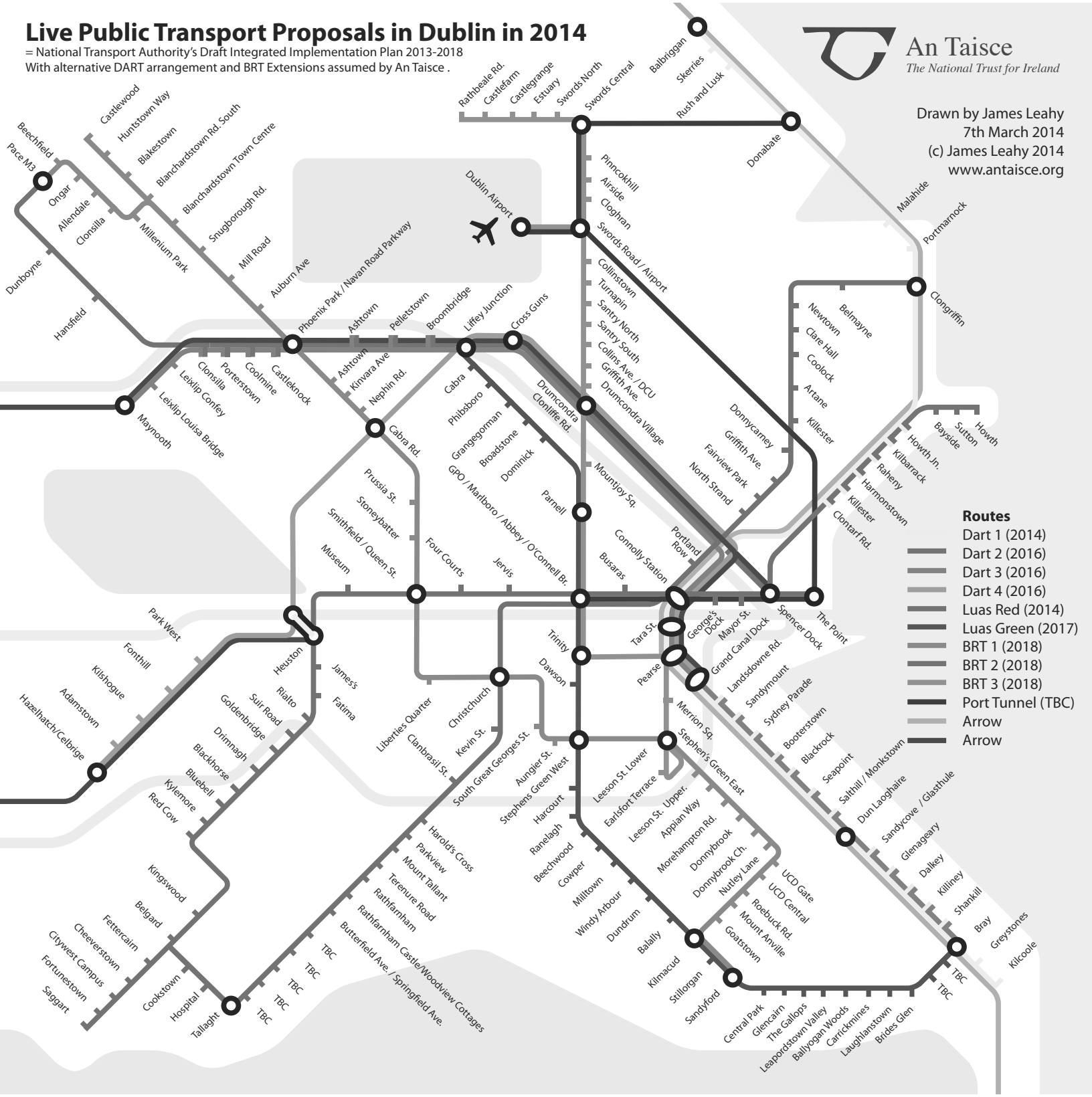
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With alternative DART arrangement assumed by An Taisce.



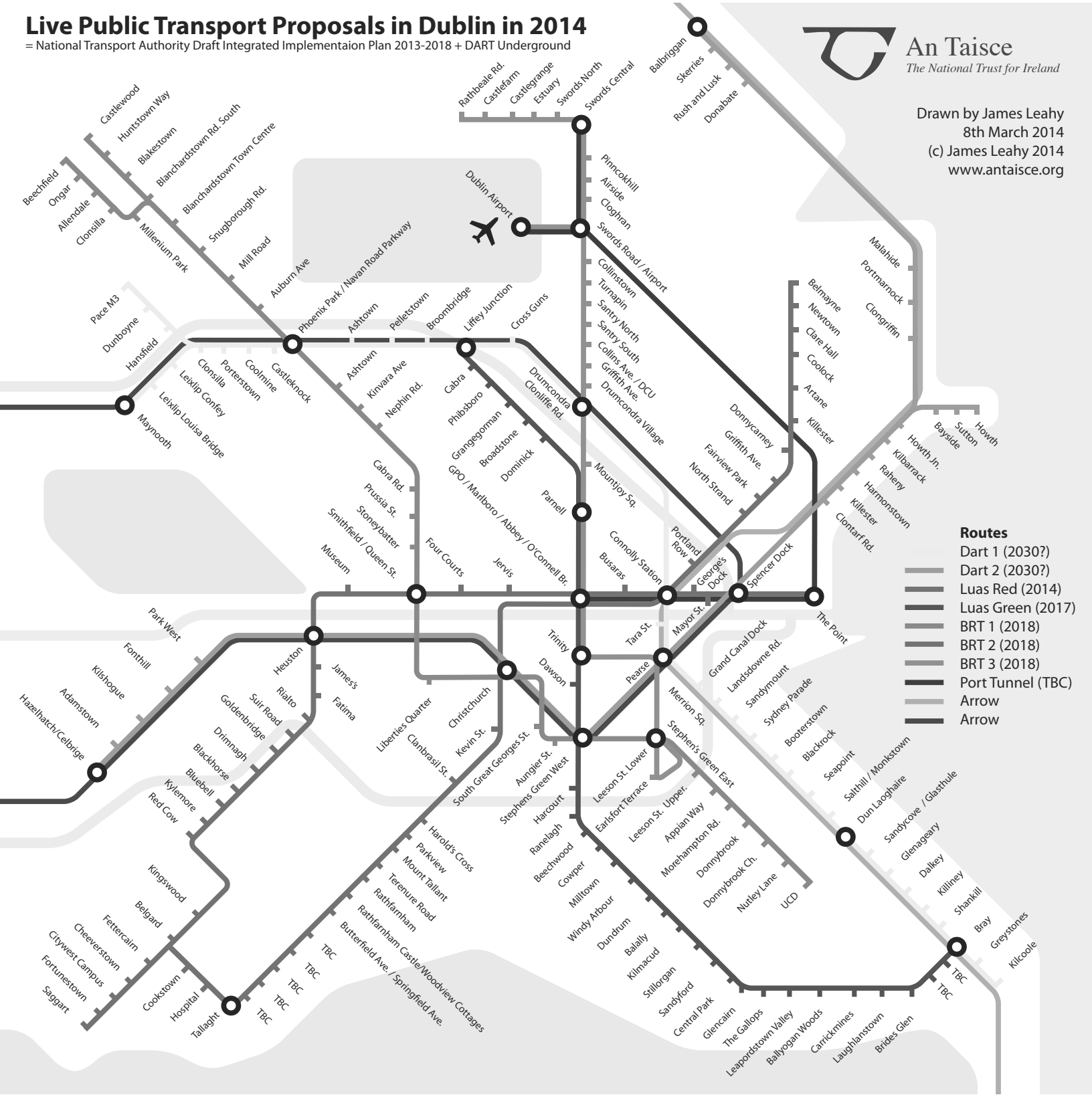
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With alternative DART arrangement and BRT Extensions assumed by An Taisce .



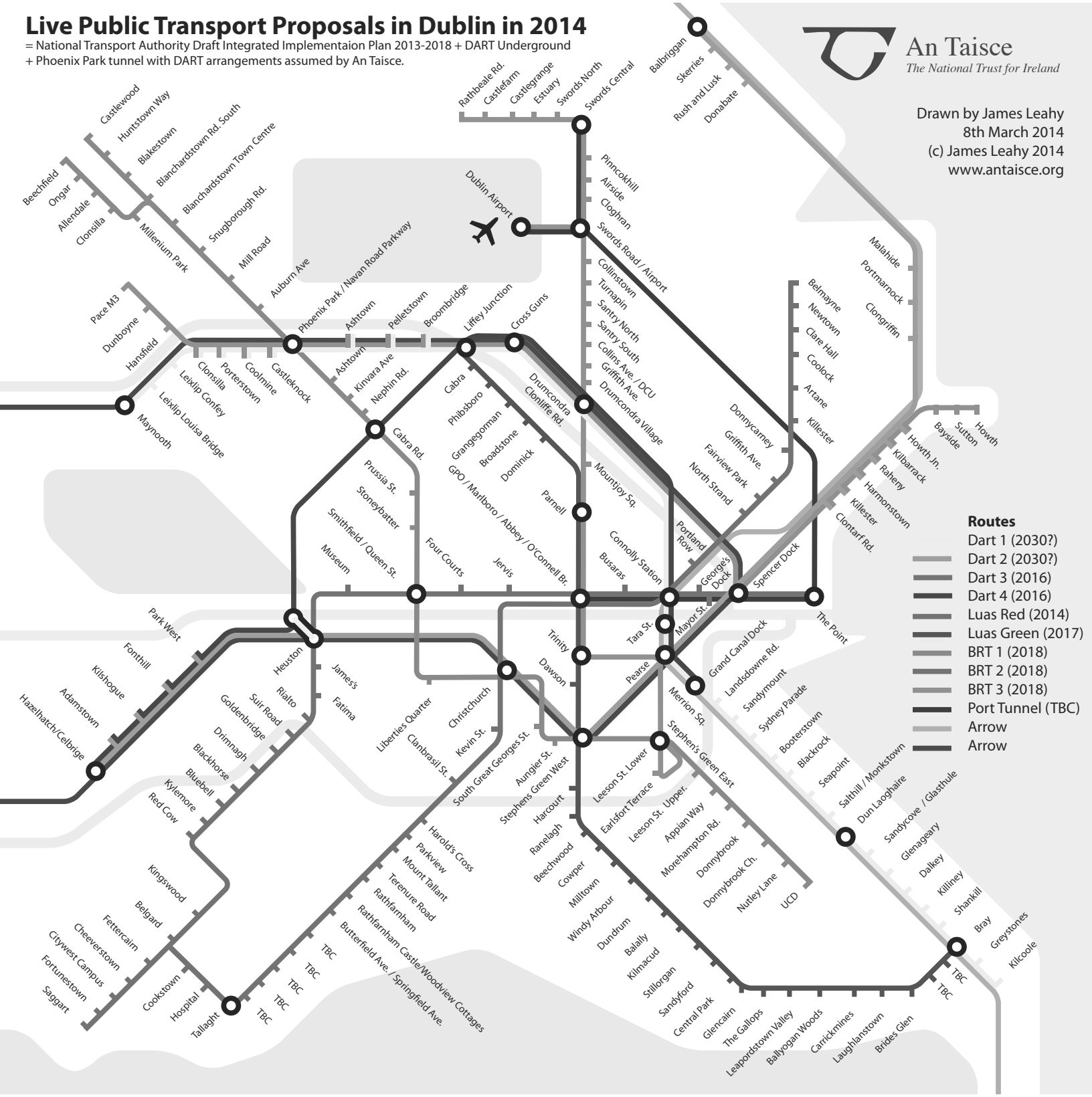
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority Draft Integrated Implementaion Plan 2013-2018 + DART Underground



Live Public Transport Proposals in Dublin in 2014

= National Transport Authority Draft Integrated Implementaion Plan 2013-2018 + DART Underground
+ Phoenix Park tunnel with DART arrangements assumed by An Taisce.



Orla O'Halloran

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:49
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: BRTSubmission_AT_C.ie_DCC_FINAL__APPENDIX.pdf

From: Damien Ó Tuama
Organisation: An Taisce, Cyclist.ie and Dublin Cycling Campaign
Address: Tailor's Hall, Back Lane, Christchurch, Dublin 2.

Comments:
Dear Sir/Madam,

This document is a combined submission from three organisations working together: An Taisce, Cyclist.ie – The Irish Cycling Advocacy Network, and Dublin Cycling Campaign. We produced our submission collaboratively as thought it would be easier for the designers to consider all of the points when presented in one single coherent thread, rather than spread over three separate submissions (and involving duplication). I would be grateful if you can note the three separate organisations when listing the submissions received.

I would also be grateful if, in the interests of transparent government, the NTA could publish (online) all the submissions received.

Thank you.

Damien Ó Tuama
National Cycling Coordinator
damien.otuama@antaisce.org

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National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Friday, November 28, 2014

Public Consultation on Swiftway Bus Rapid Transit – Swords/Airport to City Centre

Dear Sir/Madam,

I am pleased to make a submission in respect to the above proposal. This submission has been jointly prepared by An Taisce (www.antaisce.org), Cyclist.ie – The Irish Cycling Advocacy Network (www.cyclist.ie) and Dublin Cycling Campaign (www.dublincycling.ie).

The submission comprises four main sections:
Section 1: Overarching Remarks / Standard Points Applying to Many Locations
Section 2: Comments on the General Planning of the Scheme
Section 3: Detailed Comments on Public Transport Aspects
Section 4: Specific points on a map-by-map basic with a particular focus on the perspectives of bicycle users
These are followed in the Appendices by schematic maps by An Taisce of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 including the Swords BRT.

Please excuse any formatting inconsistencies / typos etc. in this submission. It took considerable time to examine the voluminous material made available on your website: http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre/

Section 1: Overarching Remarks / Standard Points Applying to Many Locations

1.1 Dublin Cycling Campaign/Cyclist.ie/An Taisce, as indicated in our original submissions, are overall strongly in favour of the concept of BRT and in this case of the proposed BRT public transport preferred route between Swords and City Centre. We are of the view that the provision of high quality public transport and BRT is an essential strand to an efficient and more sustainable transport system where car commuting is de-prioritised. This imperative is all the more pressing as the scientific knowledge around the cumulative build-up of fossil-fuel based emissions crystallizes further – as set out, for example, in the latest publication of the Intergovernmental Panel on Climate Change (http://www.ipcc.ch/pdf/assessment-report/ar5/syr/SYR_AR5_SPMcorr1.pdf).

1.2 We commend the NTA and consultants in producing such a comprehensive and detailed report and route assessment process. We are particularly happy to see the inclusion of 'cycle network integration' as part of the Multi Criteria Analysis (MCA) approach, as outlined in the Route Options Assessment Report.

1.3 The present drawings which, as indicated, are 'subject to further development', contain a number of minor errors in presentation, which create a certain amount of confusion in determining the detail of what is actually proposed in a small number of areas. We look forward to perusing the final iteration of the drawings in order to comment fully.

1.4 We are conscious that the overall design must meet the requirements of the Roads Act, 1993, Sect 13.(5), which states: "In the performance of their functions under subsections (1) and (2), a road authority shall consider the needs of all road users". From our examination of the drawings and as elaborated below, it appears that at too many junctions and along some links, the cyclist is thought of as a 'pedestrian on wheels' rather than a user of a vehicle and this translates into very circuitous, convoluted and ultimately inadequate provision for cycling.

Junctions, Crossings and Shared Cyclist/Pedestrian Spaces

1.5 We have issues with virtually all of the junctions in relation to cycling and these need to be looked at in detail. The final proposed solutions need to be outlined clearly.

1.6 Four arm / complex junctions. On many/most of these junctions, especially north of the canal cordon, there are a number of serious short-comings. These include:

(a) Inadequate treatment for cyclists emerging from or travelling into local roads. It is totally inadequate for bicycle users to have to take right hand turns in 4-5 stages. See for example Map 9.
(b) For every junction, all right turn and straight-ahead movements need to be checked. In too many cases, these manoeuvres are far too convoluted and disjointed. It seems that it is only the left-turn manoeuvre for cyclists that appears to have been considered!

(c) Additionally, how is it proposed that these junctions will be signed for cyclists so as to

explain how they proceed straight-ahead or turn right? It is important to consider this in detail. If you imagine someone driving a car and approaching a complex junction: at a certain point the lanes are arranged to allow vehicles to go left/straight/right depending on the situation. There are clear and timely markings in the middle of the lanes and often signage explaining to vehicles how to negotiate the junction. At no stage is it expected that a car will stop in the middle of the junction to figure out what is going on or to make a u-turn. Now consider a cyclist approaching a similar junction. In many, if not most cases, it is not at all obvious to a cyclist how they can legally and safely make a right turn or even go straight on. If a cyclist is not familiar with the junction - or has not got a detailed engineering drawing with him/her - the information conveyed by the infrastructure will send the cyclists down the road to the left. This is unacceptable.

1.7 We are very much in favour of roundabout removals, as indicated in the Swords area and on R132, and their replacement by signalised junctions, as these are generally more receptive to safe use by cyclists and pedestrians. However, in too many cases, cyclists are simply shunted into shared spaces with pedestrians which contravenes the NTA's own guidance. Section 1.9 of the National Cycle Manual includes the following advice: "Shared facilities between pedestrians and cyclists generally result in reduced Quality of Service for both modes and should not be considered as a first option." (http://www.cyclemanual.ie/manual/thebasics/1-9-pedestrians-and-cyclists/). This advice is entirely consistent with the feedback we receive hear from the National Council for the Blind of Ireland. Please revisit all situations where (potentially fast moving commuting) cyclists are set the share space with pedestrians.

1.8 Where off-road cycle tracks are proposed, it is essential that there is a level difference with the footway. Shared cycle-pedestrians spaces are only acceptable (both for cyclists and pedestrians and especially mobility impaired pedestrians) in very low flow situations. This design feature is very common in the Northwest Swords area Map 2 particularly.

1.9 BRT/QBC passing a side road on the left. There needs to be design provision for car drivers turning left across BRT/QBC lane *and then across cycle-lane on the inside*. There is a serious safety issue here for cyclists. This repeats itself throughout the scheme.

1.10 When off-road cycle tracks are provided, it is unclear / not thought through how cyclists turn right off the off-road track to access developments on the opposite side of the road.

BRT and Other Vehicles

1.11 We are very unhappy with the proposals for cyclists in relation to crossing the Airport roundabout. The proposals as outlined are a particular deterrent to cyclists traveling north to south towards the city: cyclists will be required to make 4 separate crossings of these busy roads just to get through this junction. This junction design needs fresh thinking where cycling is concerned and we recommend that some form of high quality pedestrian/cyclist bridge is carefully considered.

1.12 It is not clear if there are due to be any longitudinal constraints on the BRT lanes at any stage to prevent interference and entry by other traffic. This is a not-uncommon feature

of other BRT systems. Clarity on proposals to restrict unwanted entry of 'other' vehicles into BRT lanes would be welcome.

1.13 Whether taxis are admitted to the BRT lanes needs to be reviewed on a case-by-case basis. Taxis can facilitate public transport trips and are very useful for people who do not have access to cars. However, if the volume of taxis in a bus lane gets to the point where the buses are being delayed then they frustrate the proper functioning of the system. Consideration needs to be given to the average occupancy of vehicles. For taxis it is low, especially given the number of taxis driving around waiting to pick up passengers. Meanwhile buses can efficiently carry large numbers of people. The Canal Cordon Counts of traffic into Dublin City centre show that efficient bus lanes into the city can carry very large numbers of people, to the extent that they can improve the situation in the general vehicle lanes as well. In particular taxis should be removed from many of the congested city centre bus lanes. When designing for taxis the question should be: Are passengers finding it difficult to find a taxi and what needs to be done about it?

Speeds and Places:

1.14 30km/hr. There are many parts of the route in which: (a) there is a very narrow cycle-lane on the inside of the BRT & Bus Lane, and/or (b) there are (multiple) left-turn movements across the cycle-lane, and/or (c) the cycle-lane is positioned on the outside (i.e. the right-side) of bus-stops and/or left-only lanes. Therefore, one can expect there to be weaving of one type or another across the paths that cyclists will be taking. For these weaving movements to occur safely, speeds need to be low. We strongly recommend that for all of the BRT route within the canal cordon area and for those other parts passing through narrow and/or pedestrian heavy corridors, that the speed limit is set as 30km/hr. We expect this will have minimal impact on journey times as bus speeds would rarely rise about 30 km/hr in these streets. This will also have a positive urban design impact in conjunction with good detailing of the infrastructure.

1.15 Consideration needs to be given, especially in city areas, to the reduction of entry/exit points on to the main route. The development of the BRT proposal needs to prioritise main route traffic flow and prioritise side entry/exit points in order to prioritise traffic along BRT route, increase safety for all road users, and reduce the level of 'rat running' by other vehicles, which are disruptive to residential areas.

Links / Other General Points

1.16 What is the legal position re cyclists using BRT lane?

1.17 It is proposed that blue painted cycle track at particular locations.

1.18 Buffer zones between (parallel) car parking / loading / taxi rank spaces and cycle track. There must be adequate width to take account of wider doors of Sports Utility Vehicles etc. Cycle tracks should never be positioned alongside parked vehicles. It is never appropriate to encourage cyclists to cycle in this position where they are vulnerable to being hit by opening doors.

Section 2: Comments on the General Planning of the Scheme

2.1 An Taisce made a submission in March 2014 on the initial consultation on the Swiftway system, which was strongly supportive of the proposals. http://www.antaisce.org/node/978

2.2 An Taisce also drew and published a series of schematic maps illustrating the potential of the various proposals in the National Transport Authority Draft Integrated Implementation Plan 2013-2018. See this press release: http://www.antaisce.org/node/366 and the maps in full in the appendix of this submission: http://www.antaisce.org/node/978

2.3 An Taisce is strongly supportive of the overall concept of Bus Rapid Transit for Dublin, of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 and of the SwiftWay proposals.

2.4 Detailed comments and constructive criticisms follow below. Here we will make some general comments.

2.5 If one goes back and reads the section on Quality Bus Corridor (QBC's) in the 1995 Dublin Transport Initiative report, there is a list of measures which were to be included in the QBC's. The list is very similar to the list in the current proposals, and what is generally considered Bus Rapid Transit.

2.6 Since 1995 there has been much debate about Bus Rapid Transit, QBC's and Light Rail Transit, both nationally and internationally. The concept of Bus Rapid Transit has become widely known among transport policymakers. The Luas in Dublin has been a striking success with the public and has changed the perception of what public transport can be, among a large sector of the population. The QBC's have been a mixed success. Where good priority and frequency were delivered there has been a large shift from private car use to bus use e.g. the Stillorgan, Malahide and Lucan QBC's. Other QBC's have been less successful. Many of the other high quality customer experience elements of the DTI proposals have not been delivered.

2.7 The conclusion that should be drawn is not that the QBC's have failed, but that they have been a partial success due to their partial implementation. What is needed now is to use the Luas as a local benchmark of quality, and to use international experience of BRT, to upgrade the QBC's to the same level of quality as Luas. The SwiftWay proposal will do this if done correctly.

2.8 It should also be noted that much has been achieved since 1995, which will make SwiftWay a lot easier to deliver compared, for example, to what a typical British city might face. E.g.

- Significant priority has already been claimed for QBC's especially on this Swords QBC route.
- We now have the Leap Card integrated ticket.
- We have a National Transport Authority to deliver integrated transport.

- We have built up considerable local skills thought the RPA and QBN Office.
- We have the Automatic Vehicle Location system and a control centre to manage public transport and traffic.
- The College Green busgate
- The Marlborough Street bridge.
- An Integrated Journey Planner and the Google Maps planner.

The missing pieces of the jigsaw are:

- Integrated branding for urban public transport
- Integrated information and mapping for public transport
- High quality vehicles
- High quality public transport interchanges.
- Good running surfaces
- Signal priority in certain areas.

Long Term Potential of BRT

2.9 Dublin has expanded massively over the last generation into a sprawling low density city. We will never provide an integrated Paris Metro public transport system across the entire city using rail due to the size and density of the area to be served.

2.10 It is crucial to deploy our investment as widely as possible and to provide an integrated network. An Taisce has illustrated this network effect in the maps in the Appendix. It can be seen that the SwiftWay and Phoenix Park tunnel projects can for the first time provide a significant integrated network of public transport services across the city. It can be seen how many potential trips could be made by making only one transfer.

2.11 Suggestions have been made in some of the maps in the Appendices for improved integration. Other maps also illustrate the long-term benefits of the Dart Underground proposals.

2.12 Another benefit of the BRT proposals is that they can be deployed quickly. If they are successful, as they have been elsewhere, a debate can be held about extending them to other areas such as Ballymun, Coolock, Finglas and Lucan. See the maps produced here by Aris Venetikidis for the longterm potential: http://www.venetikidis.com/ArisV/DUBLIN_TRANSPORT_MAP.html

Comments on Capacity

2.13 The comments on capacity, that BRT is a mode that fits in between conventional bus and Light Rail Transport, are not valid. International guidance and examples show that BRT can provide the same capacity as Light Rail Transit. There are a variety of criteria for why one might choose between Light Rail Transit and Bus Rapid Transit. It is not a case of deciding the capacity that is required and then selecting the mode. The existing QBC's such as the Malahide, Lucan and UCD ones, have an actual delivered capacity of up to 8000 passengers per direction per hour (i.e. buses with capacities of 91 or 125 at 60 to 120 buses per hour.).

Environmental Concerns

2.14 As noted there are a variety of options for propulsion of the vehicles. Wrightbus in Ballymena manufacture efficient diesel hybrid buses. The Cristalis trolleybus BRT system from Lyon is also an option. When considering the environmental benefits it is important to consider the potential reduction in car use. E.g. A BRT system with diesel buses will still deliver a reduction in local and overall emissions due to the reduction in private car use. Furthermore the lower cost of BRT means that more if it can be deployed. The potential for emissions reduction per euro of investment should be considered.

Section 3: Detailed Comments on Public Transport Aspects

Welcome for the scale of the investment

3.1 An Taisce strongly welcomes the improvement in provision for buses that these proposals represent. They should be able to deliver a proper Bus Rapid Transit service rather than just some sort of super-QBC. In particular we welcome:

(a) The decision to provide continuous high quality infrastructure and to address pinch points through road widening, land purchase, bridge reconstruction and significant construction. In the past QBC's were often limited to working within the existing roadway leading to significant comprimises.

(b) The reallocation of general traffic lanes to bus lanes and the creation of bus only streets in the city centre.

(c) The rationalising of lane widths for all lanes along the route. The consideration of urban design in the City Centre.

The Dublin Port Tunnel Bus Services

3.2 The bus services through the Dublin Port Tunnel from Swords and the Airport will remain attractive for many passengers. They may serve different areas, provide a better door-to-door journey time or provide a better chance of getting a seat. Both should compliment each other. The branding of these Port Tunnel services should be considered in the delivery of the Swiftway to Swords. At BRT platforms in Swords and the Airport there should be clear information on the different options passengers have.

Enforcement of Bus Lanes

3.3 The BRT lanes in the centre of the Swords bypass are a welcome innovation. Where kerb lane BRT lanes are provided: General traffic should not be allowed enter the BRT lane beyond the junction at all. Before the junction all general traffic should generally be excluded. If traffic is allowed in, it should only be left-turning traffic. Traffic going straight-on should not be allowed in as is the present arrangement on many QBC's.

3.4 Consideration should be given to concrete, plastic or rubber physical separators to exclude general traffic.

3.5 The legislation should be amended to allow for enforcement cameras on the front of buses. If they encounter a vehicle illegally in the bus lane they should record this

allowing a fine to be posted out. This would be fair and efficient as, by definition, the illegal car would be delaying the bus.

Bendy Buses

3.6 There appears to be a prejudice against bendy-buses in the London based media. These are run successfully in many places across the world and can be designed to work in Dublin.

3.7 The trial of bendy buses on the No. 4 a few years ago was doomed to fail from the start due to the use of bendy buses with only a single door.

3.8 In the section on cycling we have made detailed comments about bike-bus interaction.

Urban Design

3.9 There is a need to consider a wider range of criteria when designing the system that narrow transport considerations. The routes will run along key urban corridors. For Dublin to be an attractive and competitive city for citizens and investors, we need to design streets that are beautiful and that consider all uses.

3.10 The Line 4 BRT route in Nantes is a leading international example. The design of the Luas on Harcourt Street and the Luas Red line through the City Centre are also good local examples.

3.11 The new Irish Design Manual for Urban Roads and Streets is excellent and should also be used: http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownLoad,32670,en.pdf

3.12 A good reference on integrating BRT into urban streets is the CERTU report on Bus with a High Level of Service (BHLS). It explains the need to provide a façade to façade urban design treatment. http://www.uitp-bhls.eu or available on request from secretary@antaisce.org

Branding

3.13 The SwiftWay branding and graphic design looks weak.

3.14 We already have good and respected brand for this type of service with the Luas brand. This brand should be used for the BRT routes too. The Luas level of quality should be used as a benchmark in delivering a similar level of quality for the BRT routes.

3.15 There is also a need to rationalise and integrate branding of public transport generally in Dublin. London has Cross Rail, Underground and bus. Paris has RER, Metro and Bus. Germany has S-Bahn, U-Bahn and Bus. Spain has Cercanias, Metro and Bus. Ireland should follow this good practice. We should have a hierarchy of services based on the passenger experience not the operator or mode. We should brand the network around a hierarchy of three levels of service: DART, Luas and Bus.
(a) DART: Covers longer distances with greater station spacing with high capacity and a minimum frequency of 4 services per hour. Can be electrified or diesel trains or possibly an express Airport bus service through the Dublin Port Tunnel.
(b) Luas: Serves urban area of Dublin with medium sized distances and stop spacing

and a minimum frequeny of 6 services per hour. E.g. the existing Luas Light Rail services and the proposed BRT services.
(c) Bus: The remaining bus services which compliment Dart and Luas. See the maps by Aris Venetikidis to see how this might look in practice.
http://www.venetikidis.com/ArisV/DUBLIN_TRANSPORT_MAP.html

Points to Consider in the Detailed Design for Part 8

3.16 The detailed design for the Part 8 Planning Application should consider the following points.

3.17 Branding and mapping. A map of high quality public transport including DART Luas and Swiftway must be produced and used. It is pointless displaying maps of independent DART, LUAS and Swiftway systems on each individual service. What the passenger needs is an integrated transport system.

3.18 The detailed design must address signage for integration with other high quality public transport services. e.g. with the train at Drumcondra and the Luas in the City Centre. There needs to be clear information for people getting off a Luas or Swiftway on the platform to guide them to the platform of the next service they wish to get. This will be difficult to design in the O'Connell St. / Abbey Street area but is very important. See for example the new Barcelona Bus Network http://www.tmb.cat/en/nova-xarxa-de-bus where there is information and signage on the footpath to guide passengers from one stop to the next.

3.19 From Parnell Square to Earlsfort Terrace the Swiftway goes through some of Dublin's set-piece urban spaces such as O'Connell Street, Parnell Square, Merrion Square and St. Stephen's Green. A high level of detail will be required for the Part 8 application to demonstrate how these spaces will work as urban places, including street furniture and paving layouts and materials.

Section 4. Specific points

Map 19

- Leeson Street and Earlsfort Terrace
  - As per sections A-A and BB, cycle-lanes of a width of 1.2m are far too narrow. As the designers may well be aware, the research of Parkin & Meyers (2010) showed that drivers pass more closely to cyclists within narrow cycle lanes than to those cyclists on roads without narrow cycle lanes. Such narrow lanes are at best pointless and at worst dangerous. See Earlsfort Terrace point below.
- The Leeson Street / Stephen's Green junction is still hostile for cycling as per these designs. More specifically:
  - The (intimidating for many) right hand turn from Leeson Street onto Stephen's Green West remains the same. this is an opportunity to address this issue

- The provision of a straight ahead eastbound cycle lane from Stephens Green South on to Leeson St is already part of the Stephens Green East scheme yet to be completed fully. This has not been included on this drawing and should be.

- Earlsfort Terrace
  - The National Concert Hall is one of the main cultural institutions in the city, and before and after events, concert goers drift back and forth across the street to the hotel and bar across the road. Surely there is an opportunity here to redefine Earlsfort Terrace as a place – and an attractive public space using high quality materials? As with the existing designs, the street is very much 'channelised' into a series of corridors defined by lines and signs. This represents a lost opportunity.
- Earlsfort Terrace/Hatch st

We note no specific provision for BRT along Hatch Street, and query the viability of the movement from Earlsfort Terrace into Hatch St. Is this feasible with large BRT vehicles?

- Merrion Row.
  - The footways on this street are of an excessively narrow width and have been for decades. The effective width is even narrower given the presence of bollards. Surely this is an opportunity to widen the paths.
  - A contra-flow cycle track on this street linking back as far as Baggot Street Lower is really needed here.
- Merrion Square West

o We do not understand why the nose-to-kerb car parking directly adjacent to the southbound cycle track is retained, as from the drawings it would appear that access to traffic other than public transport and bikes is forbidden.. Surely this is the time to move this parking – and the drawings show extra proposed parking on Merrion St Upper and there is ample parking on the other sides of Merrion Square.

- Merrion Street Lower / Lincoln PlaceWe are happy with the provision of a northbound contra-flow cycle track on Merrion St. Lower, but provision for entry into rear of Trinity College should be included we are concerned about the utility of an off-road cycle track takes a tight (LH) turn onto Lincoln Place - do we want this last piece in!!?
  - LH turn from Westland Row onto M.St. Lower. It is a really bad idea to position a cycle track on the LHS of a tight left turn here. The safer manoeuvre here is for the cyclist to take the lane; otherwise they risk being crushed.
- Leinster Street
  - We strongly endorse the proposal to run a contraflow cycle lane Westwards to link with Nassau Street (and on to Suffolk Street)

Map 18

- Westland Row
  - As per the designs, no northbound cycle lane is shown, even though this is a priority Cycle Route 13 in proposed GDA cycle network; cyclists, it is assumed, will share the BRT & bus lane. It is recommended that the speed limit on this street is set at 30kph.

  There is no p
- Lombard Street

- o We strongly endorse the proposal to run a northbound contraflow cycle track along Lombard St. However, the plans need to be clear on a route for cyclists coming from Westland Row northbound to enter Lombard St. This needs to be addressed. We also suggest that thehis northbound route be extended to Liffey.
- o Similarly the contraflow track needs to continue northwards onto the quays

- Pearse Street
  - o Westbound. Given the proximity of this route to Trinity College Dublin and the nearby Dublin Bikes station, it is preferable that a wide (2.5m +) cycle track is provided here to allow for cyclists of mixed abilities to over-take each other. There is adequate width available from building to building to cater for this proposal.
  - o Eastbound. We strongly endorse the proposal to have an eastbound contraflow cycle lane. However, the tie-in with the D'Olier Street cycle-lane needs to be re-examined/configured. Additionally, the contra-flow cycle track on Pearse Street needs to be extended southbound along the rest of Pearse Street towards Ringsend Road

  We note proposed repositioning of pedestrian crossing on Pearse St close to Shaw Street and wonder why!?
- College Street

o While appreciating that the BRT route does not extend beyond the College Green area , we feel it is incumbent to indicate how the prioritised Cycle Routes 7 & 11 in the GDA Cycle Network, will link in with Dame St/Nassau St It is unclear from Map 18 what is proposed at the junction of College Street and Westmoreland Street. How is it proposed that bicycle users will continue onto College Green (and then onto Dame Street and Grafton Street)? This is too crucial a junction to be left unresolved!

- D'Olier Street/College St/Westmoreland St

We strongly endorse the general proposals for this area. The proposals should greatly improve these areas as public spaces. But, we recommend that the complex junction at CollegeSt/Townsend St be given a clear 'Visualisation' to enable clarity of interpretation. We also suggest that provision be included for cycling to and from Hawkins St.

- o We strongly endorse the proposal to rationalise the space on Dolier St so that there is only one remaining Shared Bus & Traffic Lane. We are concerned however with the design detail, traffic signalling and positioning of the cycle-lane to the left of the BRT & Bus Lane when, presumably, buses will be turning left onto Townsend Street

- Westmoreland Street
  - o It appears as if the proposed off-road cycle track is two-way. The drawings need to show the tie-ins with other tracks more clearly.

Map 17

-
- O'Connell Street

o We note O Connell St plans for cyclists are still to be developed, but also note present plans show no provision for northbound cyclists between O Connell bridge and Henry St Northbound. Plan for cyclists?

- o Southbound. Proposals for cyclists to access Westmoreland St 2 way cycle track from O Connell St should be clarified

- Parnell St and Marlborough St, while not prioritised in the GDA Cycle Network, should be referenced as potential 'low traffic' cycle routes and designs incorporated to faciliate cycle movement avopiding thje busy O Connell St both in north and south directions
- Parnell Square East
    - Northbound. We warmly welcome the provision of a northbound cycle-lane to link with North Frederick Street. We also support the design element of having a cycle track behind the bus-stop. This will work well on the incline as the speeds of cyclists will be low/moderate.

    The proposal as outlined for a 'shared lane' northbound on Parnell Square east needs to be clarified. Is this to include ALL traffic as it would appear!? We are not in favour of 'other' traffic in this area, as it will critically affect BRT and public transport performance.

    - Re: the idea of having the cycle track behind the bus-stop on the southbound direction, we are cautious about the idea of fast-moving cyclists interacting with embarking/disembarking bus passengers here. The detail needs to be right here.

Map 16

- Consider reduction in side entry/exit routes to increase main route traffic flows, improve safety for all road users, and reduce 'rat running' traffic levels.

we note provision at Binn's Bridge for proposed Royal canal cycle route crossing

- North Frederick Street
    - Outbound. Adequate buffer between parking/loading/taxi bay and cycle track?
    - Inbound provision for cyclists between Dorset St and Hardwicke St on N Frederick St needs to be clear as this is also part of GDA Network cycle route 3
- Dorset Street Lower
    - Outbound. Concern that a (narrow) cycle-lane is positioned on the inside of the BRT & Bus Lane and that there are multiple side roads into which cars will be turning. From a Bikeabilty perspective, the cyclist would be safer cycling in the middle of a narrow combined bus and cycle lane.
    - Both cycle lane and BRT lane widths are sacrificed on part of this route (see Section CC) - this design needs to be revisited, favouring sustainable transport options, possibly at the expense of reducing pathway widths and placing public lighting on buildings rather than lamp standards!?

Map 15 (Drumcondra)

- Drumcondra (Tolka River) Bridge
    - Outbound. There is conflict between visualisation diagram and outline plan drawing. If Shared space between pedestrians and cyclists is proposed as in Visualisation it puts both parties at risk. Additionally, the north end of the cycle track brings cyclists back onto the carriageway at the point where vehicles turn left. POTENTIALLY VERY DANGEROUS.

    - Inbound. Cycle lane alongside BRT & Bus Lane looks very narrow. See general point above.
- Upper Drumcondra Road
    - Staggered pedestrian crossing. A single stage crossing would treat pedestrians with more dignity rather than treating them like sheep!
    - Outbound. Outside St. Patrick's College, is the cycle lane part of the BRT platform?
    - Inbound. Junction with Richmond Road. Again, cyclists are being positioned in a less-than-ideal situation with respect to left turners into Richmond Road. This need revisiting.
- Lower Drumcondra Road
- The proposed cycle tracks appear to mirror existing routes. Many seasoned cyclists stay on main road at this location due to poor quality of cycle track and the number of junctions to be negotiated, where present priority is for exiting motor vehicles. The priority for cyclists needs to be clear from all directions!
- The longitudinal profile of the cycle tracks in both directions on this section needs to be improved, particularly at crossings of minor roads. The present profile is one of the reasons why many cyclists remain on the main road. There is also an opportunity to improve the relatively steep entry to the southbound cycle track by relocating the entry point from Drumcondra Road Lower to a point further northwards.
- This section as in many others along the proposed route needs to give consideration to closing off a number of side road entry/exit points, and developing alternative traffic flows. the side road incursions, while necessary at some points are disruptive of main route flow, and need to be prioritised

Map 14 (Drumcondra / Griffith Avenue)

- Outbound
    - Junction with Wellpark Avenue. Left-turn conflict with straight-ahead cyclists - need to be clear on priority.
- Inbound
    - Junction with Griffith Avenue. Left-turn conflict with straight-ahead cyclists - need to be clear on priority.

  major issues again with cycle options at Griffith, especially for right turners, and also for straight ahead priority, both on main route and East-West legs

Map 12 (Whitehall)

- Swords Road / Collins Avenue Junction
    - The same issues in relation to shared facilities occur again
    - major issues again with cycle options at all junctions especially for right turners, and also for straight ahead priority
    - Cyclists mixed with pedestrians here. Not satisfactory.
    - How is it proposed that inbound cyclists on the Swords Road turn right onto Collins Avenue?

    - How is it proposed that eastbound cyclists on Collins Avenue (Whitehall side) turn right onto Swords Road to head inbound?
    - Particular difficulty with cyclists travelling from old Swords Road towards City and how it is proposed that they negotiate this junction
    - No idication of west-east or east-west cycle orovision on Collins Avenue
- Swords Road/Shantalla Road Junction design needs a full revamp to take account of Priority Cycle Route 2A from Swords to City Centre. Design shown on Map 12 is unclear in realtion to priority. Consideration should also be given to close off minor roads to motor traffic at this junction

Maps 11 and 13 (Coolock Lane/Santry)
We assume that proper priority will be given to BRT crossing on Coolock Lane and at Swords Road junction
The same issues in relation to shared facilities occur again
major issues again with cycle options at all junctions especially for right turners, and also for straight ahead priority
While we appreciate that the proposed cycle routing through Santry village is not on the direct route of the proposed BRT, we are very disappointed with the marginal changes proposed through this area, shown on Map 13. This is not in keeping with the stated aims in the Route Options Report Section 2.7, to provide...'cycle infrastructure to the appropriate level and quality of service (as defined by the NTA National Cycle Manual) required for a primary cycle route', nor for what is proposed as major Cycle Route 2A in GDA Cycle Network.

- Outbound
    - Left turn slip lane into Omni Park creates a difficult zone for cyclists. Not recommended as per Cycle Manual: "Slip lanes often give drivers an unreasonable sense of priority, and by virtue of their oblique geometry, they restrict views of cyclists and pedestrians. They should be removed wherever possible." (http://www.cyclemanual.ie/manual/designing/4-5-left-turns/)
    - Crossing of Santry Avenue. It would be advantageous to run large cycle logos across the junctions here - i.e. to link with cycle/bus lane on other side of junction.
- Swords Road / Coolock Lane junction. Provision for cyclists is totally inadequate here. Cyclists appear to be given the crumbs at the table here and are mixed with pedestrians. How is the right turn from Coolock Lane onto Swords for cyclists supposed to work?We would hope that this is not indicative of the standards proposed for Route 2A as outlined in the final GDA Cycle Network Plan!?

Map 10 (Santry Lane / Turnapin)

- South of Santry River (on both sides of the road)
    - Cyclists mixed with pedestrians on a shared surface. This is inadvisable on a commuting route where cyclists will be travelling at speed, and it should be possible to extend the land take on Morton Stadium side to enable full separate provision..
- Turnapin Lane junction
    - Need to avoid mixing cyclists and pedestrians here as well [CHECK GRADIENTS HERE. SPEEDS WILL BE HIGH IF THIS IS DOWNHILL]

Map 09 (Dardistown)

- Junction of Swords Road and Collinstown. The design of this junction needs to be revisited. Cyclists appear to be an after-thought, sharing with pedestrians and losing priority for many movements. More specifically:
    - Provision for northbound cyclists along Swords Road across this junction is too fragmented and discontinuous.
    - Right turn for cyclists from Collinstown onto Swords Road inbound. How does this work?
    - Similarly right turn for cyclists coming from airport on to Collinstown Road

Map 08

- Inbound and outbound. Shared space between (potentially very fast moving) cyclists and pedestrians is unsatisfactory. - this section has just been recently completed as laid out on this drawing. It is essentially no change to the existing situation, which has been praised in a number of quarters!
- Junction of Swords Road and South Corballis (airport entrance) Road. There is terrible service here for cyclists:
    - On every arm of the junction it appears to be assumed that all cyclists turn left! What about (i) straight-ahead manoeuvres and (ii) right hand-turns?! This need to be catered for properly.
- North of South Corballis(Airport Entrance) Road going outbound, heading northwards
    - This provides a very low level of service for cyclists through sharing space with pedestrians and losing priority at six entrances. This is not of a standard consistent with the new cycle manual!
    - It is completely unclear how cyclists will turn right off this 'facility' - turn right to where!!?? - there are no options
- Junction opposite 'Kealy's'.
    - Conflicts / loss of priority for southbound (staight-ahead) cyclists with left-turners. This needs to be revisited. - this at present is a dead end entrance with no activity….but point taken

Map 07 (Airport Roundabout / Cloughran)

- Airport Roundabout
    - North, East and South arms. It is assumed that these will be signalled to provide priority for BRT? - this roundabout is already a signalled roundabout. Are you just making a GENERAL point here as it should be assumed that ALL junctions will give priority!?
    - As mentioned above under 'General Points', the cycle provision at the main Airport Roundabout is unacceptable and will not lead to increased cycling along this route due to the complexity of movements required when heading towards the city. This junction requires a radical solution.
- Clonshaugh Road junction
    - We welcome the conversion of the roundabout to a signallised crossing.
    - However, it is still slightly unclear how each of the right-turn manoeuvres for cyclists will take place. There appears to be little right-turn pockets to support two-stage crossings. Will these be supported by dedicated cycle signals to

enable cyclists to move ahead of the traffic which is behind them (some of which might be turning left)

Map 06

- Two-way cycle track on East side of road. We are uneasy about the provision of two-way cycle tracks alongside roads where there are adjacent developments or side-roads, given that drivers exiting these places may not expect to see cyclists.
- Outbound. Cycle provision outside of Texaco. Given the geometry of entrances to the petrol station here, there is a high risk of conflict with straight-ahead moving cyclists. The design here is totally inadequate to meet the five needs of cyclists: road safety, coherence, directness, attractiveness and comfort - as stressed in the NTA Cycle Manual (http://www.cyclemanual.ie/manual/thebasics/fiveneeds/)
- Dublin Road / Boroimhe Road / Airside four armed-junction and approaches to the junction.
    - See standard point above.
    - Shared space with pedestrians on a commuter cycling route is not satisfactory
    - Both straight-ahead and right turn movement for cyclists are convoluted. They also involve the cyclist interchanging between being a cyclists and pedestrians-on-wheels.

Map 05 to Map 03

1 We fail to understand in the context of the overall design why no cycling provision is proposed along the R132 between the Estuary and Pinnock Hill roundabouts, despite the explanation in Section 3.4.3 of the Options Assessment Report. The R132 is the most obviously direct route from North Swords & North Dublin to the airport and city centre, and there is adequate width to enable cycling provision to be accommodated.

- Pinnock Hill Roundabout/junction
    - We welcome the conversion of the roundabout to a signallised crossing.
    - However, provision for cyclists at this reconfigured junction is still VERY poor.
        - While there are four general traffic lanes plus the BRT lane on the southern approach arm to the junction, cyclists are lumped in with pedestrians and forced to take a convoluted route simply to continue through the junction. This is the type of design we came to expect 15 years ago, but not in 2014! This needs revisiting. Cyclists are not pedestrians whenever a junction appears!
        - All other arms and manoeuvres need to be ‘proofed’ from a bicycle perspective.
- North of junction, what happens to cyclists?!

Map 04

- Junction with Malahide Road
    - While we welcome the conversion of the roundabout to a signallised four armed junction, the proposed design still looks like it represents an incredibly intimidating space for cyclists. By providing so many lanes of traffic(left-only,

straight-ahead, right-only) on the approach to the junction, this has the effect of creating a very long crossing distance for cyclists using the Malahide Road. Even for pedestrians (and especially elderly or more mobility impaired pedestrians) walking across four lanes of traffic to reach the BRT stop will feel intimidating. In the context of ultimately seeking to reduce car trips, these types of designs where so much provision is made for cars need to be phased out.

- Junction with Seatown
    - Similar comments to previous points above apply.

  The cycling links at the Seatown Junction (Map 4) on the R132 need to link in with plans being developed for the Sutton to Swords cycling route, and should indicate these potential links, as this route is likely to be quite busy and used for leisure cycling once developed.
    -

Map 03

- Castlegrange Road / R132 junction.
    - There is inadequate clarity as to how cyclists are to cross the R132, say, to travel from Castlegrange Road to Newcourt Road (? i.e. the road off which Newcourt links). Sharing with pedestrians is not satisfactory. Cyclists are road users not pedestrians! PLEASE STOP TREATING CYCLISTS AS PEDESTRIANS WHEN THEY REACH JUNCTIONS.
- Balheary Road crossroads.
    - Once again cyclists are turned into pedestrians at junctions. This is not satisfactory.
    - How are cyclists to go straight and turn right for each movement through the junction? Clearly this has not been addressed.

Map 02

- West end of scheme
    - Again, the cyclist is assumed to be a pedestrian on wheels. Not satisfactory.

Map 01

- For various stretches on the westbound and eastbound directions, it is unclear / not thought through how cyclists turn right off the off-road track to access developments on the opposite side of the road.

We trust you find the above comments helpful as the scheme advances to the next stage. We look forward to seeing the next iteration of design drawing.

Yours faithfully,

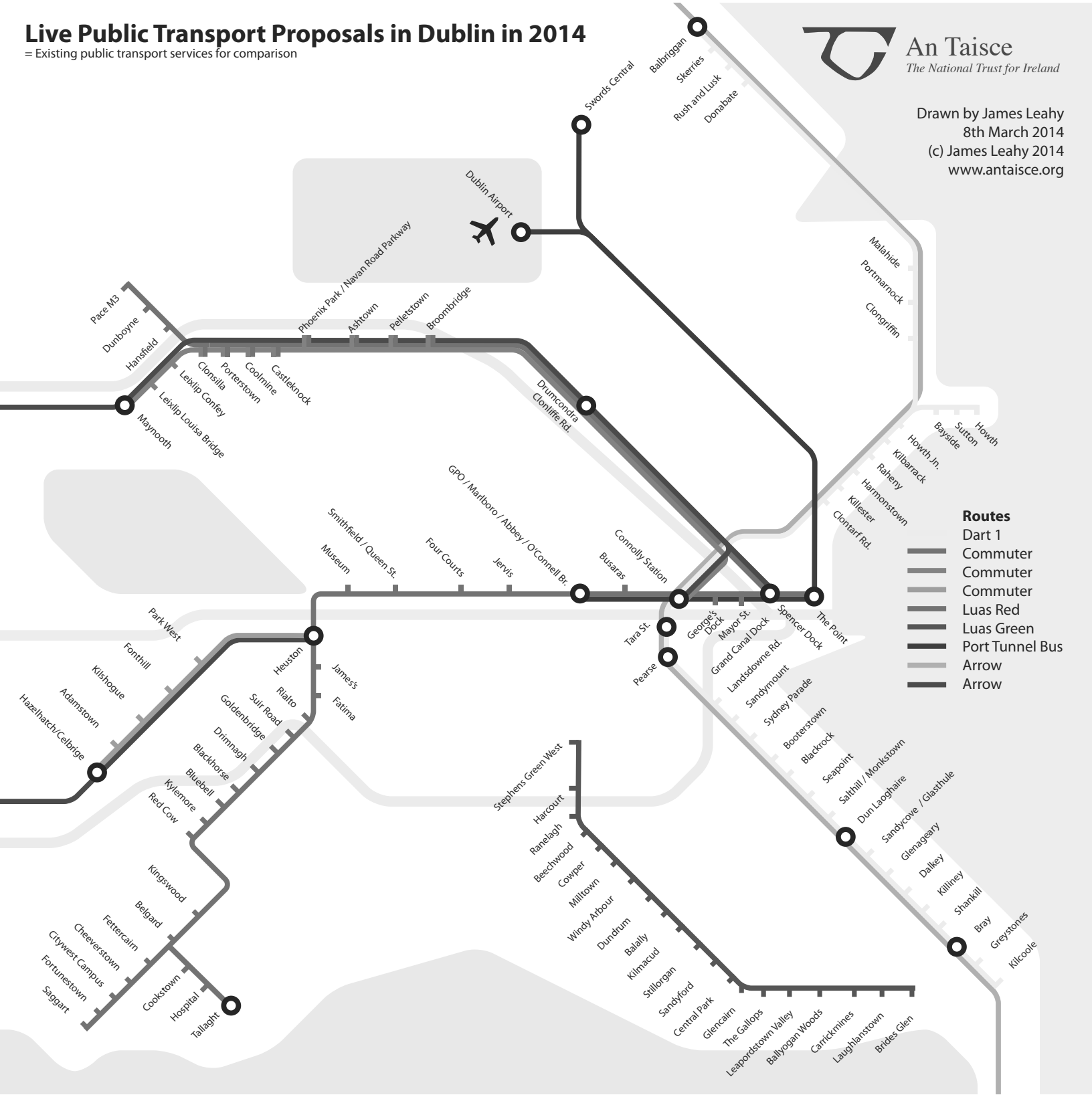
Damien Ó Tuama
National Cycling Coordinator – Cyclist.ie / An Taisce

APPENDIX

Schematic maps by An Taisce of the National Transport Authority's Draft Integrated Implementation Plan 2013 – 2018 including the Swords BRT.

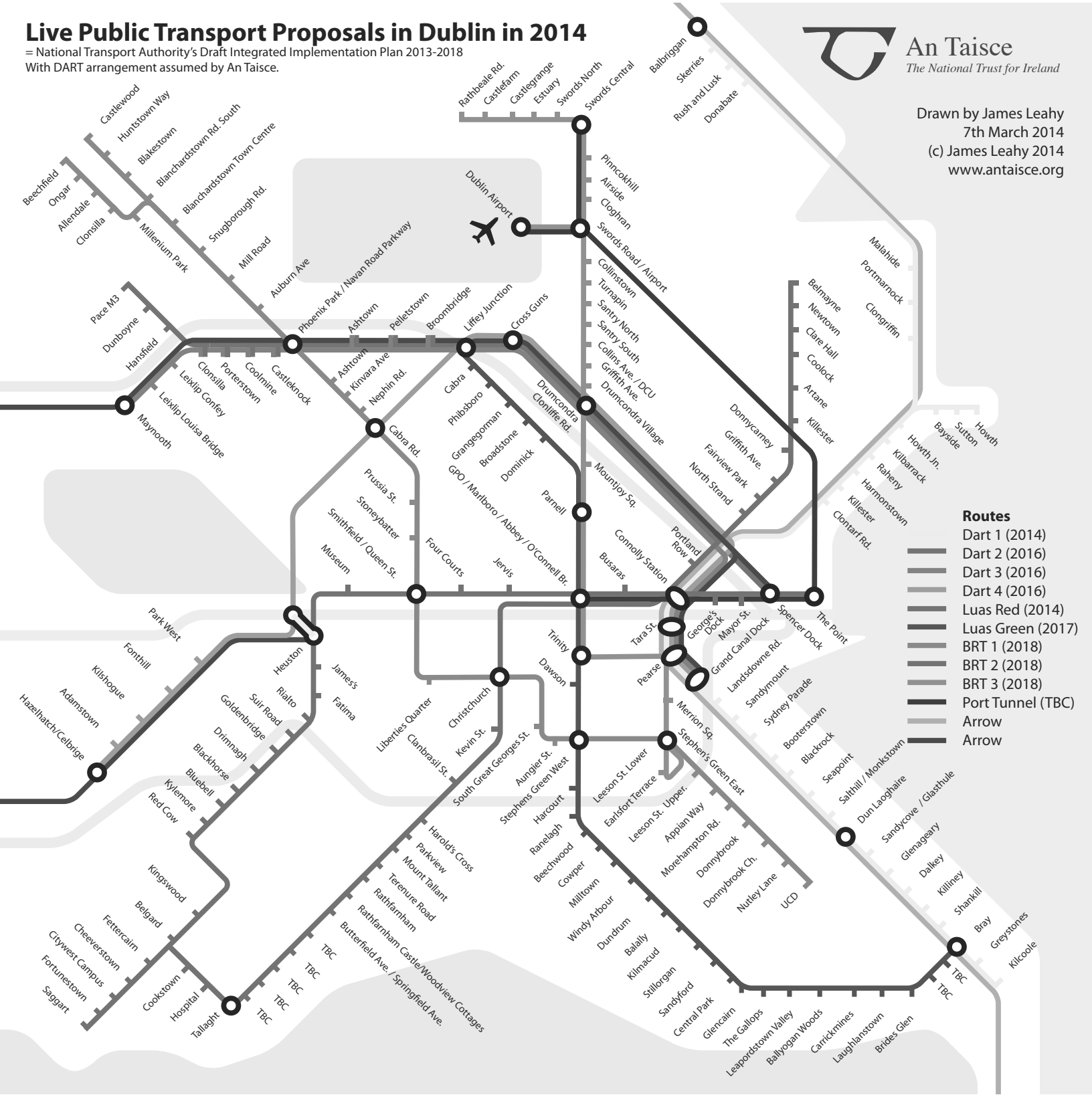
Live Public Transport Proposals in Dublin in 2014

= Existing public transport services for comparison



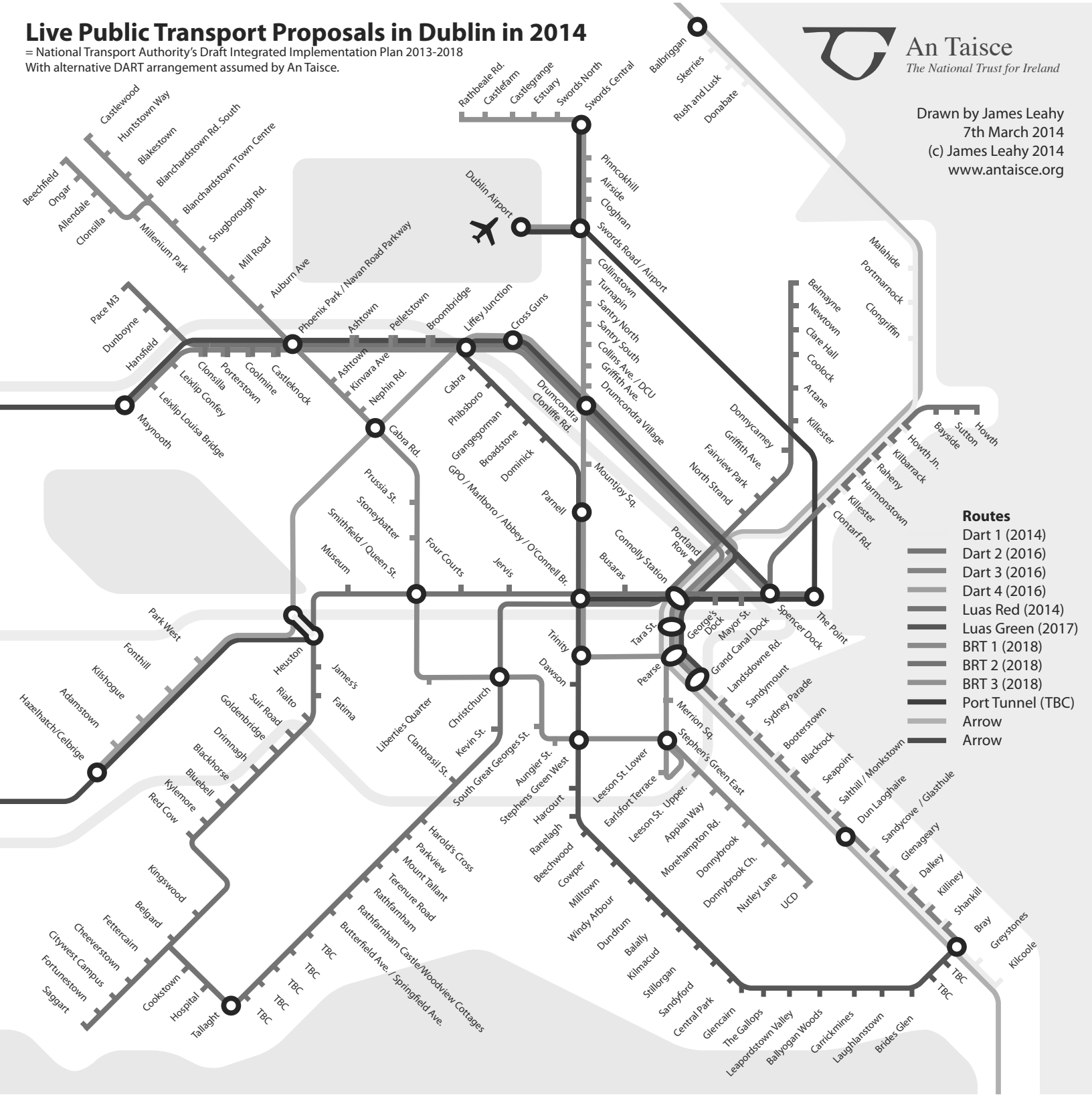
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With DART arrangement assumed by An Taisce.



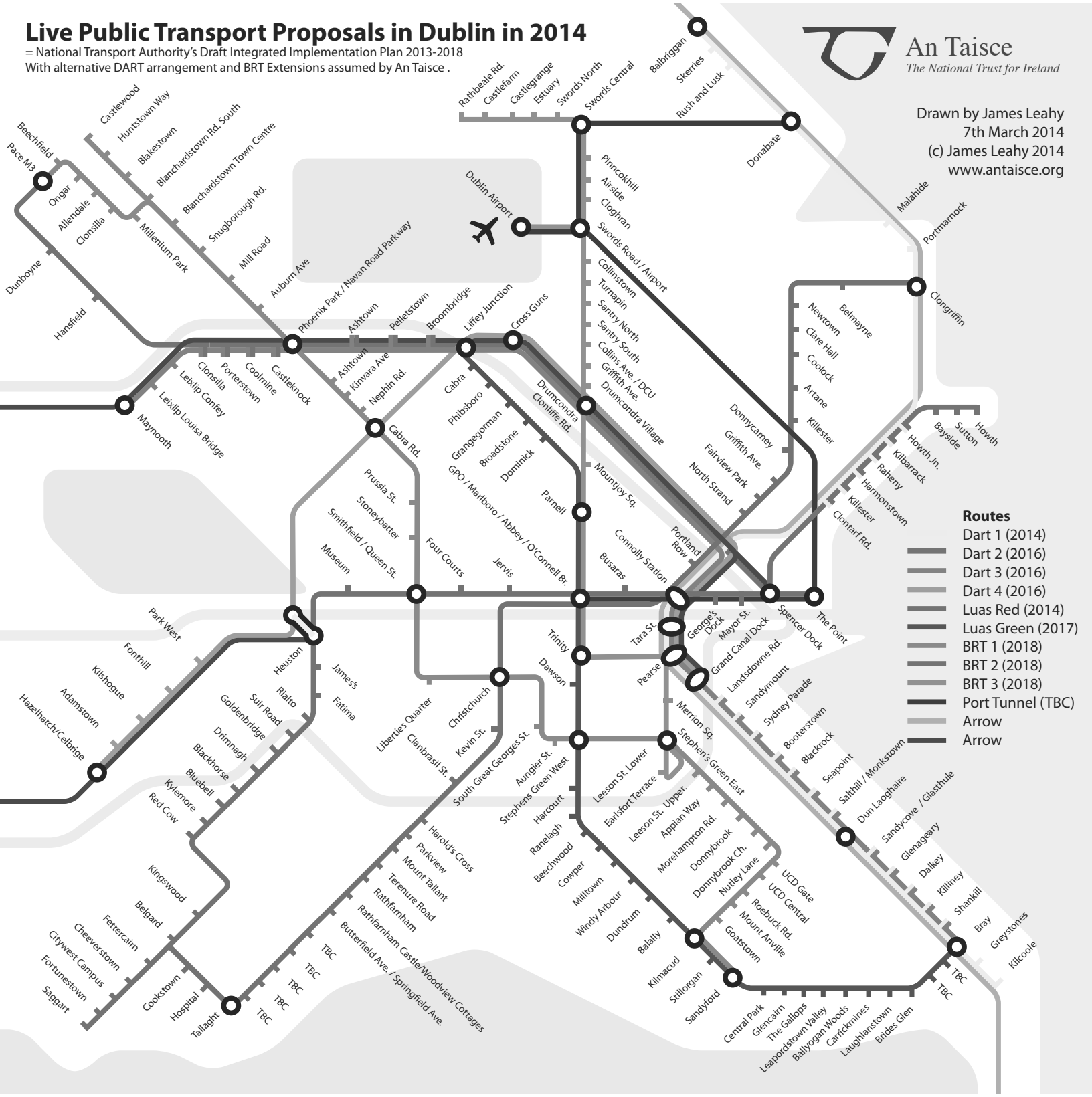
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With alternative DART arrangement assumed by An Taisce.



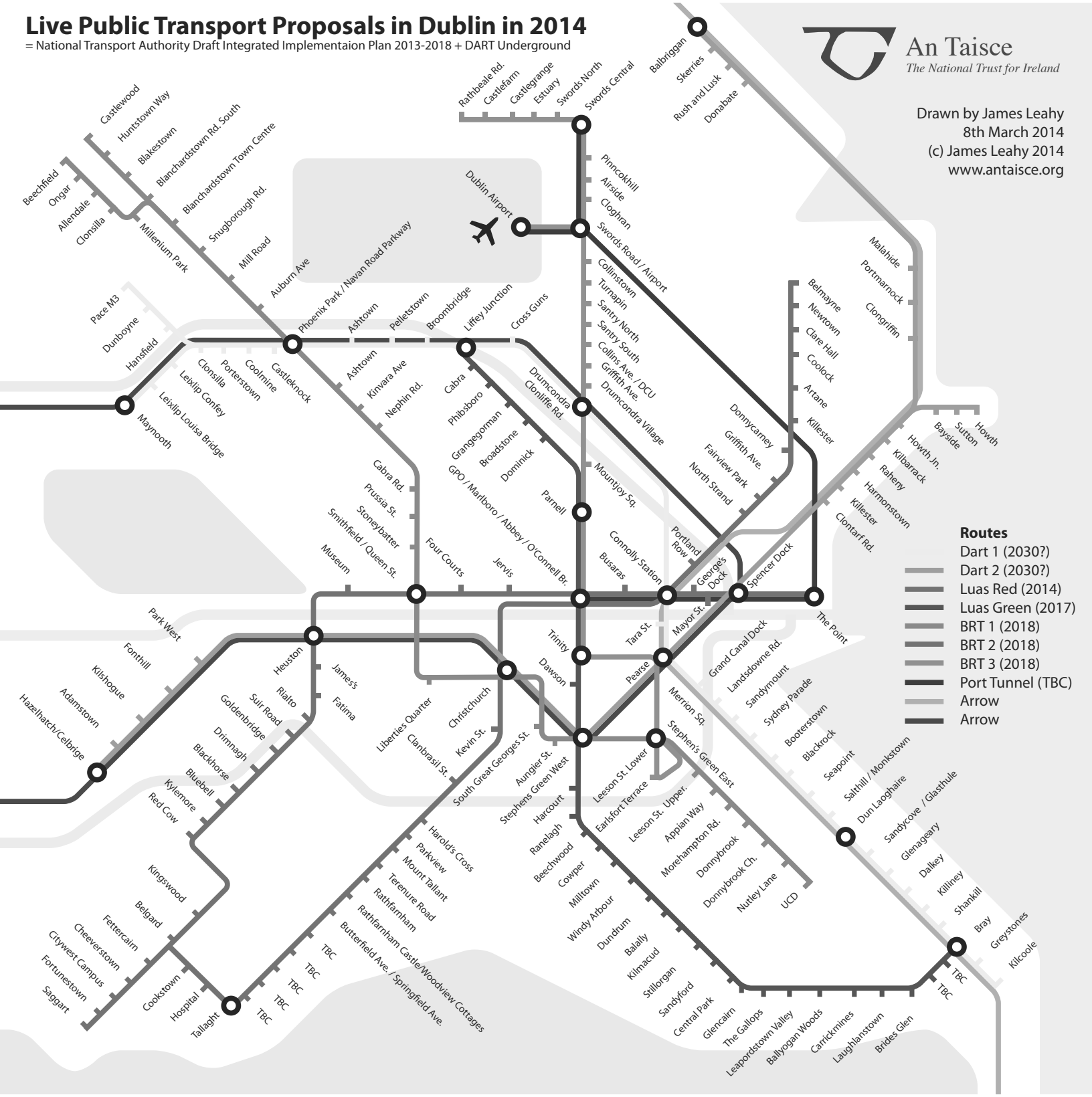
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority's Draft Integrated Implementation Plan 2013-2018
With alternative DART arrangement and BRT Extensions assumed by An Taisce .



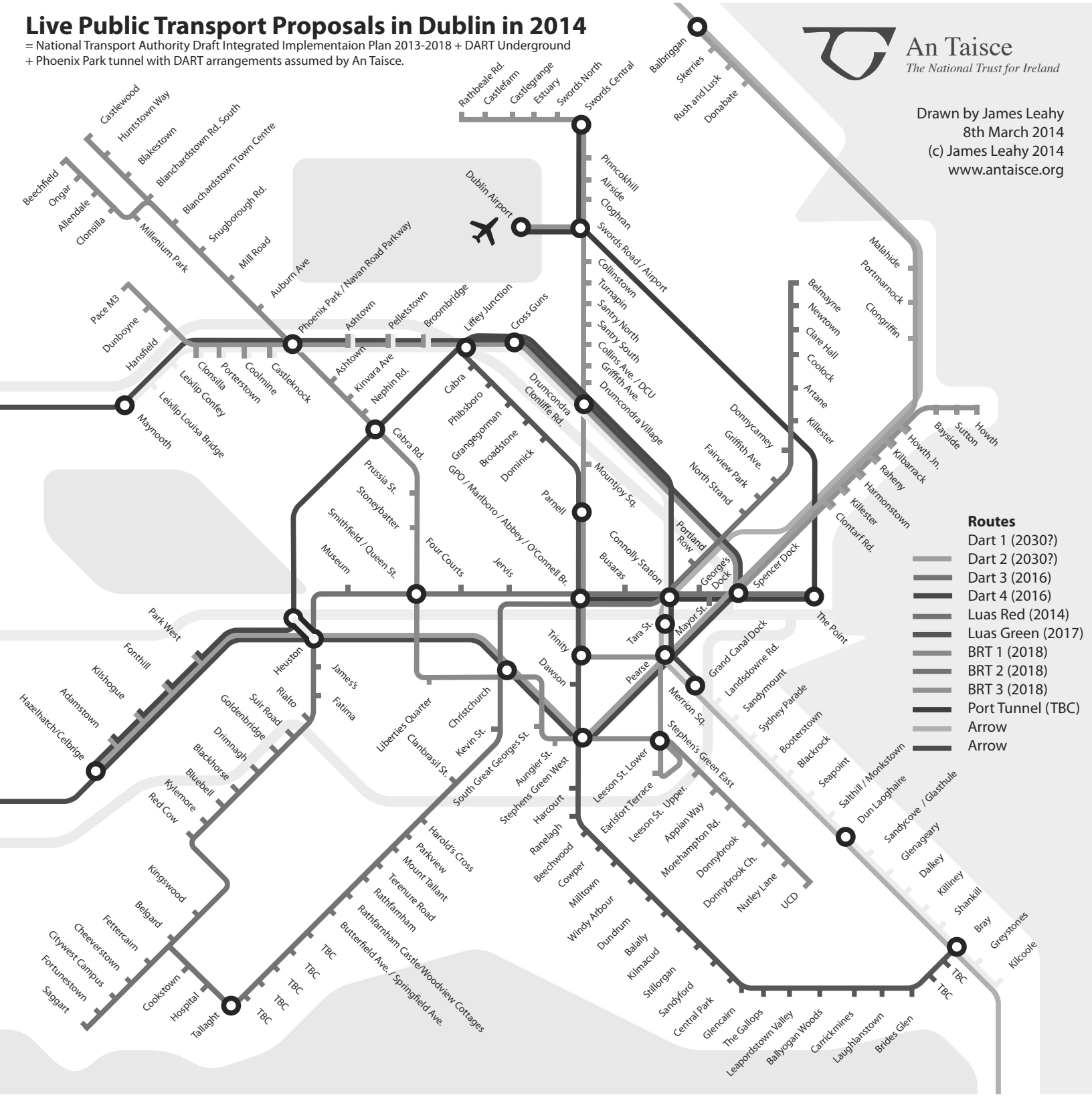
Live Public Transport Proposals in Dublin in 2014

= National Transport Authority Draft Integrated Implementaion Plan 2013-2018 + DART Underground



Live Public Transport Proposals in Dublin in 2014

= National Transport Authority Draft Integrated Implementaion Plan 2013-2018 + DART Underground
+ Phoenix Park tunnel with DART arrangements assumed by An Taisce.



[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:59
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
I have the following opinions on the Swiftway service

It is a good idea, but:
1. If it in any way delays the introduction of a metro it should not be entertained. Swords is the largest town and the 9th largest conurbation generally in Ireland.
It is the largest not to have a train. Dun Laoighre has had a train for over 150 years, and yet the introduction of rail to Swords is still not even being planned in a serious fashion.
2. In order to better deal with the traffic in the city center it should share a route with the Luas over Hawkins Street and to Stephen's Green. This will make it less dependant on traffic volumes.
3. It is too far from Swords Main Street, and the estates to the south of Swords such as Rivervalley, Highfields and Ridgewood to be easily accessible.
One way of bringing it closer to Swords Main Street would be to have it come to the Pavilions Roundabout directly outside McCabes and then go back to the original route. The road is wide enough to facilitate that. Even though that is not quite Main Street, it is much more accessible and then the Swiftway would have a larger user group, and feel more like a transport system for the town of Swords.
4. The provision of a public walkway through the grounds Colaiste Coilm would help make it more accessible from Rivervalley and other estates not provided for.
5. There should be no need to remove parking from the Swords Educate Together school. There is a large body of land directly opposite the school that has no buildings on it. A Compulsory purchase order could be made on that land to secure it for the beginning of the route. Parking is very difficult near that school anyway, but is essential.
6. The Skate park is one of the few facilities for teenagers in Swords, and has been an excellent resource. No steps should be made to remove it without having built another one, perhaps in an unaffected part of the same park, as to remove it would give the youth one more excuse to engage in anti-social behaviour, through sheer frustration.

--
This e-mail was sent from a contact form on National Transport Authority (http://www.nationaltransport.ie)

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:45
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Submission_to_the_NTA_re_BRT_28_November_2014.docx

[redacted]

Comments:

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Submission to the NTA re Updated proposals for BRT in Dublin

[redacted]

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General Comments:

I welcome the revised route plans for the Swords-South City Centre corridor. I think that they probably do provide the most rapid route for the proposed Swiftway service. I have made some detailed comments on the individual route sections further in this submission.

However, I do have several concerns which still have not been tackled in these plans, which I have set out below.

Vehicle Type:

I strongly feel that an 18m articulated vehicle, as planned for this service, with a capacity of approximately 45 seated passengers and 75 standees is not the correct type of vehicle for a journey from north of Swords to the south city centre.

At peak times, this will mean that people will be standing for a considerable distance from Swords to O'Connell Street, a journey that is likely to take about 25-30 minutes. While this may be acceptable on a train, standing on a bus is a completely different experience, as the buses have to start/stop as traffic demands and far more frequently than on a tram or train, and unfortunately the ride quality is never completely smooth.

The peak expected demand numbers quoted in the report indicate that it is already foreseen that passengers will be standing from at least Swords South to O'Connell Street – is this really a high quality form of transport? I don't necessarily think so.

Articulated vehicles would, in my opinion, be far more suited to relatively short trips across the city centre, of approximately 30 minutes duration, with an average passenger journey length of 15 minutes, leading to much shorter periods of standing on board.

With this in mind I would suggest that large capacity double deck vehicles with three doors would be more appropriate for the Swiftway service from Swords.

The MAN Lion's City DD model as used in Berlin (and pictured below) would I believe offer a far superior customer experience on a route such as this. These 13.73m long vehicles incorporate three doors, two staircases, and offer seating for 83 people, and capacity for a further 38 standees, making a total of 120 people, the same as an articulated vehicle. The vehicles offer rapid boarding and egress through multiple doors, much improved seating capacity over an articulated vehicle, and are fully accessible. The design is much better suited to longer journeys, which indeed many of the Swiftway trips from Swords would be.

I would strongly advocate the design team to re-examine the vehicle type selection, as I don't think it will provide the highest quality service that customers deserve at peak times in particular.

On the other hand, the Dublin Airport-Earlsfort Terrace service would be more suited to operation by the 18m articulated vehicles, possibly fitted with additional luggage racks. The journey length to O'Connell Street would in my view be just at the outer limit of how far I would expect people to be standing at peak times.

MAN Lion's City DD in Berlin

picture source:
http://en.wikipedia.org/wiki/MAN_Lion's_City#mediaviewer/File:NEOMAN_A39_2007-03-15.jpg

Service Patterns

I note that peak service frequencies of every 4 minutes from Swords and every 8 minutes from the Airport have been outlined. There may be a need to have short workings in the morning peak, with additional vehicles starting from Santry North for example operating to the city at regular intervals to ensure that peak demand is catered for.

Park & Ride

I do believe that the emerging preferred route is the best option for the service, but I think that there are significant areas of Swords which will be beyond the reach of Swiftway, including much of River Valley, and anywhere south of the Rathbeale Road. Reference was made to providing a Park & Ride facility at Pinnock Hill for Metro North. I would suggest that this facility should be provided from the outset with Swiftway. It would facilitate those who live too far to walk from the Swiftway stops, and also potential users from north of Swords who wish to use the service.

Without providing such facilities, I think the requirement to retain a much higher normal bus service will be compelling.

Impact on Existing Bus Network

I note that reference is made in numerous parts of the report to the need to rationalise and redesign the existing bus network along the corridor served by Swiftway. However, nowhere in any of the documentation is any detail on this provided.

As I stated in my submission to the first consultation:

"It is critical that for people to understand the impact that the introduction of BRT will have on their commute/travel, that at the next consultation phase the full list of proposed changes to the bus service is also provided. Without this, people cannot judge this project correctly."

However, nothing is provided in any of the documentation to help potential users judge this scheme. The planning of Swiftway should not be done in isolation. **At the same time** the opportunity should be taken to include a complete redesign of the public transport network along the corridor, and to explain to customers what the revised indicative routes will be and their projected frequency. The impact on existing bus routes that Swiftway may have could be very significant and I think that people should be informed of what this will be, rather than have it come as an afterthought.

It is impossible for anyone to properly judge this scheme without any indication of:

- How existing routes will be redesigned in both route and service frequency
- What feeder routes would be provided and at what frequency
- Whether these feeder routes would facilitate through ticketing – will people have to pay twice?

Areas of concern to me would be:

- Swords Manor (over 1.5 km away from the BRT route). It has a basic 5 minute peak frequency bus service (10 minute off-peak).
- River Valley - currently a bus every 10 minutes at peak and every 20 minutes off-peak serving this area
- Airport – Will the connectivity with the south city be maintained through the 16 bus route
- Santry Village / Omni Park – This is a major traffic generator that is bypassed

Are these to be serviced by feeder bus routes to/from BRT, or will additional direct bus services to/from the city and beyond be maintained?

While feeder routes could be used in Swords, I think that both the Airport and Santry (and points in between) will need a conventional bus service to be retained (albeit at a reduced frequency), to allow for the additional stops and the extra cross-city dimension.

The lack of any information on the NTA's thinking on this is somewhat alarming, as it seems to be viewed as an afterthought, while it ought to be an integral part of the project.

Ticketing:

Once again there are rather vague comments about the ticketing in the documentation.

Will the ticketing, including period passes, be integrated with the rest of the bus network, or will it become even more fragmented with Bus, Swiftway, LUAS and Rail all considered as separate?

BRT will benefit significantly from off-bus ticketing, but I think that if feeder services are to be used to connect other areas with the BRT service (I'm particularly considering those places such as Swords Manor and River Valley that have a full bus service), that integrated time based tickets will be needed, and which are priced so as not to put customers from those areas at a financial disadvantage.

A simplified ticketing system with transferability is another critical aspect that needs to be addressed as part of the BRT roll out.

Stop Locations:

I welcome the addition of a Northwood stop on the route – this is one of the biggest traffic generators on the route.

I believe that Dardistown should be included at the outset, rather than potentially into the future.

I also believe that an additional stop should be provided at Drumcondra Bridge, between "St Patrick's" and "Drumcondra" stops, as this area generates significant numbers of public transport journeys.

Hours of Operation

Consideration should be given to extending regular operating hours to between 0500 and 0030, with a reduced frequency (every 30 minutes) through the night on each BRT corridor. This is particularly relevant for the Swords/Airport corridor.

Detailed Comments on individual section designs:

Map 19 - St Stephen's Green:

- The space allowed for regular buses stopping on St Stephen's Green East is insufficient for the numbers of buses involved – it should be at least four bus lengths (two buses per stop) if the Rathmines routes revert to their normal routing post-LUAS construction work
- Presumably the inbound bus stop at the northern end of Earlsfort Terrace will be retained (it's not on the map)?
- The southbound bus lane on St Stephen's Green East is now split into two lanes from roughly halfway along that side of the Green, to allow buses turning left into Leeson Street a clear run – this needs to be retained. A result of this is that the northbound bus lane for BRT traffic turning right would start halfway along the Green rather than at the junction with Leeson Street.
- The BRT service should route northbound directly along Merrion Street Lower and Lincoln Place to access Westland Row, rather than looping via the gyratory at Clare Street and Lincoln Place. This would eliminate a very tight lefthand turn from Lincoln Place into Westland Row, and ensure the service takes the most direct route.
- Traffic from Fenian Street and Westland Row should only be able to turn left onto Merrion Square North, rather than having the option of turning onto Clare Street.

Map 18 - Pearse Street:

- Southbound BRT stop on Lombard Street East should be relocated to outside Pearse Station on Westland Row to maximise connectivity.
- Every effort to minimise southbound general traffic on D'Olier Street needs to be taken as the street is being reduced to one general traffic lane from three. This (in my view) requires the College Street Bus Gate to become a 24/7 operation. This would mean that general traffic could only access Townsend Street or Westmoreland Street (via College Street).
- A separate northbound general traffic lane should be provided in Westmoreland Street for access to car parks on Fleet Street from College Street – I would include this at the expense of an unnecessary southbound cycle lane to the west of the bus stops (cycle traffic can continue to use D'Olier Street and College Street). The traffic lane on the east side of Westmoreland Street should be a bus/BRT lane to ensure priority for BRT and public transport.
- The provision of bus stops in the centre of both D'Olier Street and Westmoreland Street is an excellent idea

Map 17 – O'Connell Street:

- Provision needs to be made along O'Connell Street for at least six to eight bus stops in either direction
- Traffic from Gardiner Row for Parnell Street should be re-routed anti-clockwise around Parnell Square North and East, both of which should become two way.
- Sufficient space needs to be provided for buses to stand on cross-city routes – operational delays are an inevitability of a cross-city service and this needs to be allowed for
- With Parnell Square North becoming two way, northbound buses on routes 4, 9, 46a and 140 could then route via Parnell Square East and Parnell Square North to access Granby Row.
- If this suggestion were implemented, then the right turn out of Gardiner Row could be eliminated, or made access only
- As part of this scheme, all tourist bus stops throughout the city centre should be made off-street (separate bays) and sufficient space provided to ensure these vehicles do not block traffic lanes unnecessarily

Map 16 - Dorset Street:

- Good spread of bus stops throughout – all fitting two buses plus entrance/egress

Map 15 - Drumcondra:

- Examine possibility of relocating BRT platforms from north of Clonliffe Road to outside and opposite Drumcondra Station – making transfers seamless
- Move inbound bus stops south of Clonliffe Road to planned southbound BRT platform location north of Clonliffe Road
- Northbound bus stop south of Botanic Avenue is fouling the bus lane and would cause BRT to be potentially delayed – surely there must be some way of having a bus stop in this vicinity that is in a bay?

Map 14 - Griffith Avenue:

- The lack of indentation of bus stops at Home Farm Road outbound, and inbound at Highfield Hospital and south of Griffith Avenue is alarming – these will negatively impact on BRT reliability – these stops are required but need to be indented away from the bus lane to ensure that BRT services keep moving

Map 13 - Whitehall:

- Southbound traffic congestion north of Collins Avenue caused by left turning traffic consistently blocks the bus lane at this location. The left turning lane is insufficient, and needs to be extended north to the planned location of the indented bus bay, which in turn should be relocated to outside Whitehall Church

Map 12 - Santry:

- Bus lanes on Swords Road north of Omni Park Shopping Centre to Swiss Cottage should be swapped over – the main requirement is for a northbound bus lane at this location rather than southbound – queuing traffic causes major delays to northbound buses between Omni Park and Santry Avenue.

Map 11 - Coolock Lane:

- Very clever use of two-way BRT lanes at Coolock Lane and retention of existing bus stops on route 17a adjacent to BRT platforms

Map 10 - Turnapin-Santry:

- Excellent to see Northwood BRT stop now included along with indented bus bays – this is a very busy location and required a stop

Map 9 - Collinstown-Dardistown:

- Removal of all bus stops between Turnapin Lane and Dardistown Cemetery is not acceptable – it creates a gap of 1km between bus stops which is excessive. There are traffic generators in this section of the route (sports facilities and businesses). I would suggest that a set indented bus bays in either direction are needed north of Glen Dimplex to facilitate these generators.
- I would include Dardistown BRT stop from the outset rather than as a planned stop

Map 8 - Airport:

- Existing northbound bus stop at Kealy's Bar has been removed – an indented bus bay is needed here to facilitate northbound bus users from Dublin Airport on routes 33 and 41c

Map 7 - Cloghran-Airport:

- The northbound bus stop immediately north of the airport needs to be reinstated as an indented bus bay - this stop has reasonable loadings
- The existing plans would result in no northbound bus stops between ALSAA and the Coachman's Inn – this is too great a distance

Map 6 - Airside:

- No issues

Map 5 - Swords Malahide Road – Pinnock Hill:

- Is traffic going to be signal controlled at the bottom of Pinnock Hill to allow BRT vehicles to cross to/from the central road space? This is not clear from the plans.

Maps 1 to 4 – Swords (Oldtown) to Seatown-Malahide Roundabout:

- No issues - The segregated BRT on the central road space of the Swords by-pass and along Castlegrange Road is an excellent idea and should contribute towards reliability

Conclusion:

A rethink of the vehicles proposed is needed, if this is to be seen as a quality public transport initiative. Tri-axle double decks would deliver this.

As outlined above this project needs to become a full review of public transport in the Dublin North Central to Swords corridor, and all existing bus services included into the project proposals at the next stage.

The plans that have been developed are impressive, but we need to see what the overall impact of the scheme will be to judge it properly.

I look forward to the next stage in 2015.

Biographical Note:

The author is a Chartered Accountant who is a daily user of public transport across Dublin. He has provided feedback to operators over the years of his experiences that have on occasion resulted in changes in operations. He has made submissions to the Oireachtas Committee on Transport, to the operating companies on service design and timetabling, and to the NTA on several proposals to date.

[redacted]

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 25 November 2014 10:54
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
I do not see the need for another bus route from swords to town there is plenty of them already what we actually need is a proper train (Metro) service. one that could connect Dublin Airport to the city center also like almost all other European Cites. The swift way is another half baked idea which will be cheaper than a train service to set up but will probably cost more in the long run and also will not stand to any one in the future , to really help develop the area properly and one that will stand the test of time a train/metro is required…..

--
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From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 17:09
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
To whom it may concern.

I object in the strongest possible terms to this transport proposal. It does not take account of the severe disruption that the construction and subsequent service will cause to residents in the area. Land grab, reduced pavement space to walk to shops and the ability of actually getting out of the estate will be highly impacted. Not least the impact on school pick ups and drop offs.

I'd be keen to see projected passenger numbers, bear in mind Swords express and Dublin Bus provide a perfectly good service as it stands, I am not enthused by any argument that we need an additional service.

Can't happen, won't happen – that's my mantra.

Good day

--
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From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 20:48
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
To Whom It May Concern:

I wish to put forward my objections and submissions against the proposed Bus Rapid Transit – "Swiftway" service and the preferred route starting at Oldtown/Castleview. I have the following concerns and objections, in particular affecting myself as a resident of Bunbury Gate/Brides Glen:

1. The negative impact on residential amenities.
2. Safety concerns for residents and in particular our children living in the estate and those attending the two local schools and community centre
3. The proposed route creates parking problems as there has been no provision made for both parking at the two local school (adjacent to the proposed terminus) and/or parking for people should they wish to use the service
4. The introduction of the Swiftway will only delay the development of the Metro – a far more sought after service for the residents of North County Dublin
5. The increased number of large vehicles on the Glen Ellan corridor – with a bus planned for every 8 minutes (at peak time) – add this to an already busy road that is currently serviced successfully by Dublin Bus and the Swords Express
6. The massive inconvenience the actual development of the proposed route will have on local residents and the community at large – not to mention bringing large construction vehicles to a quiet residential area with such close proximity to local schools and a community centre
7. The lack of planning for park and ride facilities
8. Increased noise at night with late buses proposed (and the possibly of unruly behavior with "night-links"

• The removal of walls at the edge of our housing estate (Bunbury Gate/Brides Glen) and the reduction of the green space currently being used as play areas for our children – unacceptable and will not be allowed by residents
• The removal of existing mature trees and bushes
• The replacement of these walls/railings with a brick/railings not matching current walls
• The moving of the local skateboard park – it took the area long enough to get such a facility and again shows a total lack of consideration for residents and their children
• The increased noise, pollution and risk of accidents along the Glen Ellan corridor road
• The increased pressure on vehicles exiting the estate (at both entrances/exits)
• The lack of planning for signals at these entrances/exits
• The proposed narrowing of the entrances to the estate
• Increased traffic with people from "outside" the area coming to use the service
• Major issues with people using the estate as a car park as there has been NO provision for parking at the new service terminus. This has been viewed as wholeheartedly a major downfall in this proposal and quite frankly insulting to the local residents. People will no doubt use our estate to park their cars in while they get the service into town/to work for the duration of a whole day. This increases the risk of children being

hit by vehicles in our estate and makes our estate a less safe place for our children to play
• The fear of pay and display arrangements being introduced to local estates
• The total lack of consideration for parking at the two local schools. This is absurd and shows the absolute lack of consideration for residents, teachers, parents and most importantly school children attending these schools. It is not only ridiculous to remove parking for the two schools but to put our children at risk in such a way is totally unacceptable. On this point ALONE we will be fighting this proposed route.
• An unnecessary and increased risk for children walking to school
• With the average time for journeys being quoted at “40-45 minutes” there really is no time saving for commuters, couple this with having to share an already route with 2 other bus companies! Swords express provide a very successful service on this route.
• No guide has been given as to the cost of journeys
• Increased littering and loitering at proposed bus routes
• Potential decrease in value of property adjacent to a busy bus terminus

[redacted]

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From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 19:50
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Definitely against swiftway, as what is needed is a metro/train not another bus service. The swiftway plans are to get rid of the skatepark(which is a much needed facility for kids), parking at schools in Applewood (limited parking already causes grief) & closure of Jugback lane to traffic which all combined will make traffic congestion worse than it already is.
This is just a band aid solution to traffic problems.
Proper funding should be spent on a proper train service….not a half done job by providing another bus

--
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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:40
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
weve been trying to get a bus route for 10 years it's ridiculous how we've been pawned off and this is a vital service us residence need ASAP

--
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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:54
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: 141128_Dublin_Central_and_Ilac_Centre_BRT_Submission.pdf

From: Christy O'Sullivan
Organisation: ILTP Consulting
Address: St Albert's House, Dunboyne, Co. Meath

Comments:
Dear Sir / Madam,

Please find attached submission on proposed BRT Swords / Airport to City Centre prepared by ILTP Consulting on behalf of Chartered Lands (Dublin Central Development) and the Ilac Centre.

Can you please confirm receipt of submission and if you have any queries please contact me.

Regards,

Christy O'Sullivan

--
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0473b

CHARTERED LAND

ILTP consulting

Submission to NTA Bus Rapid Transit – Preferred Route Swords - Dublin Airport to City Centre Corridor

Client: Chartered Land & The Ilac Centre

November 2014

SUBMISSION TO NTA BUS RAPID TRANSIT – PREFERRED ROUTE SWORDS / AIRPORT TO CITY CENTRE CORRIDOR ON BEHALF OF THE ILAC CENTRE AND DUBLIN CENTRAL

Description:

Submission to NTA

Author:

Michael Higgins

Ben Waite

Approved By:

Christy O'Sullivan

28th November 2014

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SUBMISSION TO NTA SWORDS / AIRPORT TO CITY CENTRE PREFRERRED ROUTE BUS RAPID TRANSIT

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1 INTRODUCTION

1.1 Background

1.1.1 ILTP Consulting were engaged by The Ilac Centre and CCL (Chartered Land Limited) to assess the potential impact of the proposed BRT Swords to City Centre and to prepare this submission to the NTA on their behalf.

1.1.2 The Ilac Centre is a major retail centre located off Parnell Street and Henry Street. The Ilac Centre operates in tandem with an adjacent1,000 space multi storey car park owned by Dublin City Council. The Ilac Centre is located in a key trading area in Dublin City centre, and extends between Henry Street, Parnell Street and Moore Street.

1.1.3 The Ilac Centre attracts over 17.5 million visitors a year, and the footfall to the Centre is now the highest of any building in Dublin City Centre. Key retailers include Dunnes, Debenhams, River Island, H&M, Argos and TK Maxx.

1.1.4 The Ilac Centre is approximately 27,000 sq. metres with 85 retail units and 12 kiosks. Including the full extent of Dunnes and Debenhams department stores, Ilac is part of c. 55,750 sq. metres of retail under one roof.

1.1.5 The permitted Dublin Central Site is located on the northern end of O'Connell Street and extends from Parnell Street to the north to Henry Street to the south. The site is bordered by O'Connell Street, Parnell Street, Moore Lane, Rahilly Parade, Moore Street and Henry Street.

1.1.6 The permitted Dublin Central development is approximately 122,000sqm and includes retail units, café/restaurant/bar units, a small number of residential units, a commemorative centre, two new pubic streets, approximately 650 no. bicycle parking spaces and approximately 700 no. car parking spaces accessed from Parnell Street.

1.1.7 In March 2010, a seven year planning permission was granted for the 'Dublin Central' development (Ref 2479/08 & PL29N.232347). The permitted development is one of the most significant developments ever granted permission in Dublin City Centre.

1.1.8 However a condition to first obtain Ministerial Consent for the 1916 National Monument on Moore Street was attached to the Dublin Central permission by An Bord Pleanála. This was achieved in 2013 and the attached condition to same discharged in July 2014. This element of the overall Dublin Central Development is currently at tender stage, with a completion date of Easter 2016. The main Dublin Central project is now capable of moving forward and CCL have confirmed that the main anchor is still interested in the scheme progressing.

1.1.9 The Dublin Central permitted development is of such a scale that on completion it will generate large scale employment and promote retail and economic activity in the north inner city.

1.1.10 ILTP Consulting acted as Transport Consultants for the Dublin Central development throughout the pre-planning and planning processes. Extensive work was undertaken to ensure that the Dublin Central development was accessible for pedestrians, cyclists, public transport users, taxis and car users from all parts of the city and beyond.

1.1.11 ILTP on behalf of The Ilac Centre and CCL also engaged with RPA, Dublin City Council and other stakeholders in the preparation of the Dublin Central planning application and as the BXD Cross City Luas Line and Metro North proposals were progressed. Dublin Central is designed to integrate with the BXD Cross City Luas line currently under construction and the approved Metro North Scheme.

1.2 Purpose of Submission

1.2.1 The NTA launched a public consultation on proposals for the Bus Rapid Transit (BRT) Preferred Route for the Swords / Airport to City Centre Corridor in October 2014.

1.2.2 The preferred route drawings provide the first opportunity for The Ilac Centre and Dublin Central to view and comment on the actual impacts of the proposed BRT on particular roads and junctions and on permitted access arrangements to the developments.

1.2.3 This submission to the National Transport Authority (NTA), BRT Preferred Route for the Swords / Airport to City Centre Corridor outlines the initial findings of this assessment and outlines proposed amendments on behalf of our Clients.

1.3 Structure of Submission

1.3.1 Chapter 2 provides a high level review of existing transport and accessibility provision in Dublin City Centre.

1.3.2 Chapter 3 provides a review of the Ilac Centre, Dublin Central, BXD Cross City Luas line permission and the approved Metro North scheme.

1.3.3 An assessment of the potential impacts of the BRT proposals on the Ilac Centre and the Dublin Central development is provided in Chapter 4.

1.3.4 In order to provide a wider perspective on the NTA BRT proposals a review of BRT schemes, particularly those on primary shopping streets is undertaken and presented in Chapter 5.

1.3.5 The key modifications to the NTA proposed scheme are outlined in Chapter 6.

1.3.6 Chapter 7 provides a summary and conclusion.

2 REVIEW OF CURRENT AND APPROVED TRANSPORT AND ACCESSIBILTY

2.1 Introduction

2.1.1 O'Connell Street is the Nation's Capital Street and forms part of the Tier 1 retail core.

2.1.2 The reduction in spending associated with the economic downturn has had a significant impact on investment in transport infrastructure in the city centre. A number of large-scale projects, including Metro North and the Dart interconnector are currently on hold.

2.1.3 Other smaller scale projects such as the Luas Cross City BXD line are under construction. We also understand there are plans to re-open the Phoenix Park rail tunnel link in the near future. Improved cycle provision and bus priority are ongoing and initiatives such as the Dublin Bike Scheme and LEAP cards have helped promote better accessibility in the city in recent years.

2.1.4 An overview of the existing situation is set out below to provide a full overview of transport and accessibility in the vicinity of the Ilac Centre and Dublin Central.

2.2 Existing Pedestrian and Cycle Network

2.2.1 The Ilac Centre adjoins Henry Street, which is the busiest pedestrian street in the State with a footfall of approximatley30 million per annum.

2.2.2 The permitted Dublin Central Development is located on O'Connell Street Upper. In the last number of years regeneration works have been undertaken on O'Connell Street. Pedestrian footpaths were widened in order to promote non-motorised transport.

2.2.3 Currently there are advisory cycle lanes in place north and south bound along the extent of O'Connell Street. There are also advisory cycle lanes in place east and west on Parnell Street adjacent to the Ilac Centre and Dublin Central.

2.2.4 Dublinbikes stations are located on Parnell Street and Prince's Street North.

2.2.5 The approved Dublin Central Development will create a much finer pedestrian network through the provision of a new east west street between O'Connell Street and Moore Street and an enhanced north – south movements from Parnell Street to Henry Street.

2.3 O'Connell Street Bus Services – Overview of Current and Planned Network

2.3.1 O'Connell Street is at the centre of the Dublin bus network. Bus stops are located north and south bound on the Street as shown in Table 2.1.

Table 2.1: Dublin Bus Routes Serving O'Connell Street

Dublin Bus Routes Serving O'Connell Street	
120	44a
122	41a
123	41b
38	41c
38a	9
38b	13
38d	16
40	16c
8	13
747	4
116	9

2.3.2 The range of bus routes serving O'Connell Street ensures that there is comparatively good public transport connectivity with all areas of the city.

2.3.3 Bus stops are located north and south bound on O'Connell Street, particularly on O'Connell Street.

2.3.4 Some other bus services, such as Aircoach and City Tour buses have stops on O'Connell Street.

2.3.5 ILTP surveys for the Dublin Central planning application found there were 303 buses stopping in the city centre during the AM Peak (08:00-09:00). While in the PM Peak (17:00-18:00) there were 328 buses stopping in the City Centre. These buses currently stop on Parnell Square, Parnell Street and O'Connell Street.

2.3.6 There have been some improvements for the users of public transport, particularly bus transport in recent years. The introduction of the 'Leap card' and real time information for bus services has provided real benefits to passengers.

2.4 Taxi Services

2.4.1 Taxis are currently allowed travel north and south bound on O'Connell Street. A taxi rank is located on Upper O'Connell Street on the north and south bound carriageways. The taxi service is also an important public transport mode particularly for shoppers.

2.5 Rail Services O'Connell Street / Parnell Street - Current, Existing and Planned Overview

2.5.1 The Luas Red line serves Lower O'Connell St. at present. There are stops in the vicinity of O'Connell Street at the Jervis Shopping Centre and Abbey Street.

2.5.2 The BXD Cross City Luas line is currently under construction and is expected to commence service in 2017. The cross city route connects the Luas Green Line from St. Stephens Green with the Luas Red Line at Abbey Street and interchanges with rail services at Broombridge.

2.5.3 Northbound a stop is to be provided on O'Connell Street adjacent to the Dublin Central Development. Southbound a stop is provided on Parnell Street between O'Connell St and Marlborough St as shown in Figure 2.1.

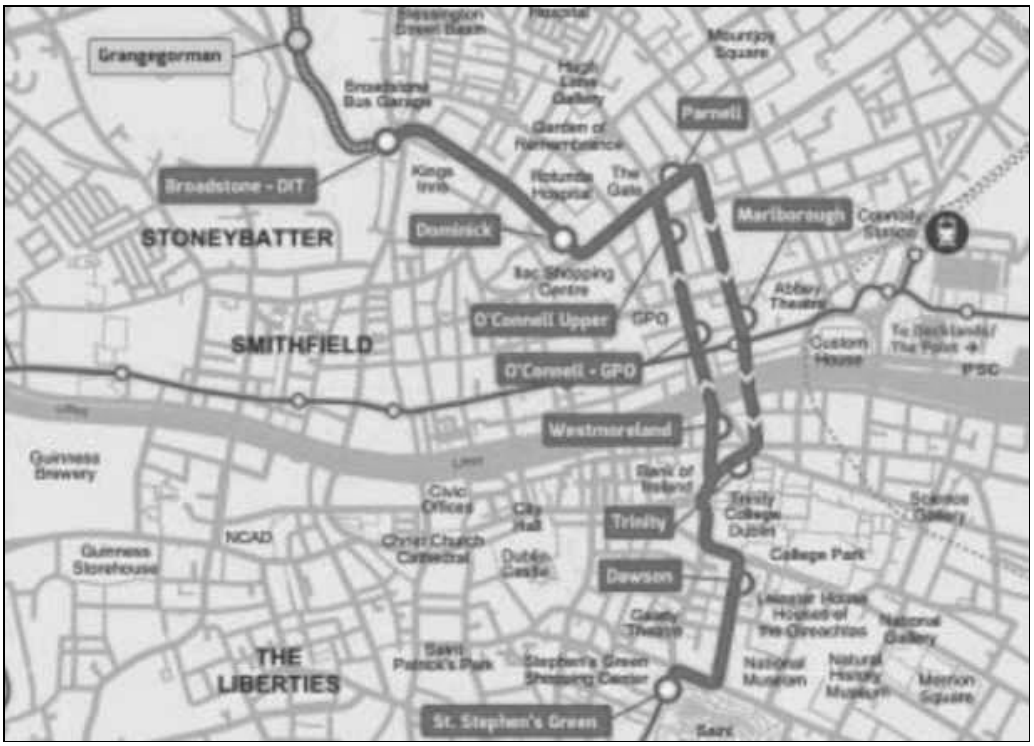

Figure 2.1: BXD Cross City Luas in vicinity of Dublin Central (Source: RPA)

2.6 Vehicle Access in the Vicinity of O'Connell Street

2.6.1 Figure 2.2 shows the existing traffic management system in the vicinity of the site. The blue route signifies the existing Inner Orbital Route (IOR), which runs along the northern edge of the proposed development. The existing orbital route includes Parnell Square as part of the IOR.

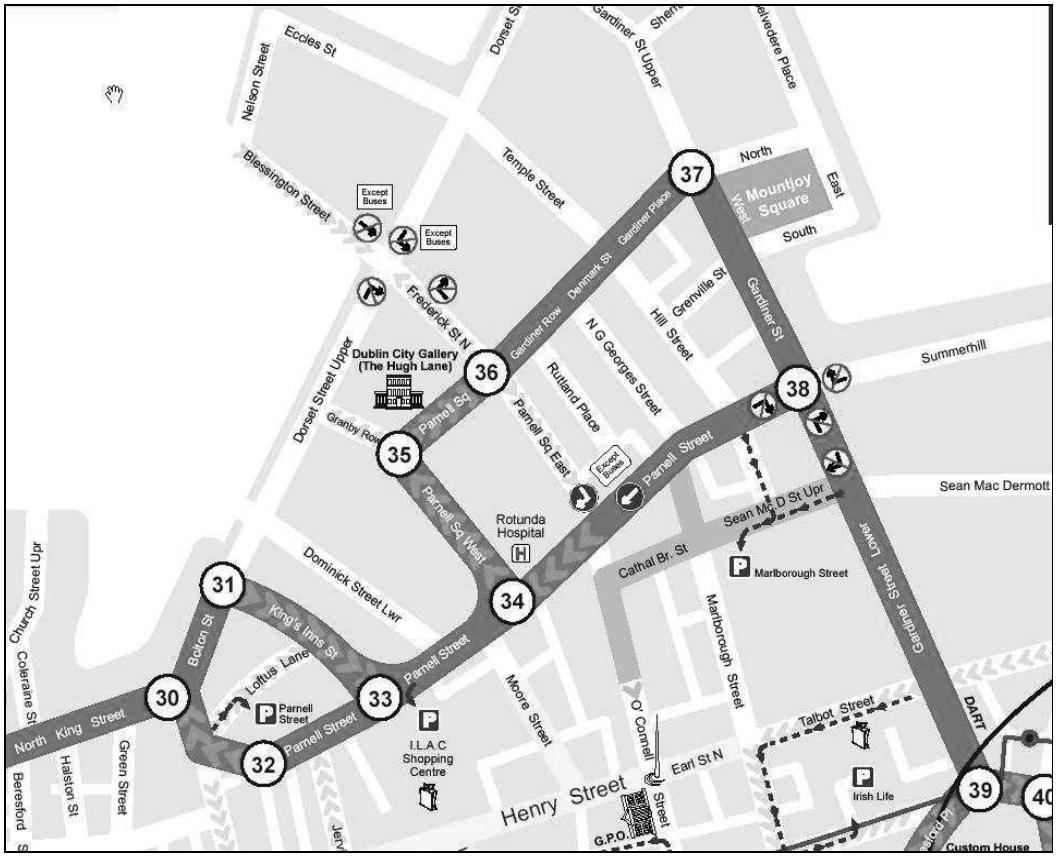

Figure 2.2: Inner Orbital Route DCC (Source: Dublin City Council)

2.6.2 Currently there is one general traffic lane northbound on O'Connell Street. Private vehicles are not permitted to travel southbound on O'Connell Street from Parnell Square east but can access the street vial Cathal Brugha Street.

2.6.3 Two way traffic is permitted on Moore Street and there is an all movement junction at Moore Street / Parnell Street.

2.6.4 Parnell Square West is one way northbound with right and left turning access onto the roadway from Parnell Street.

2.6.5 Vehicular traffic can travel southbound on Parnell Street East and turn right or left onto Parnell Street.

2.6.6 While there are some restrictions on vehicular movements there is currently reasonably direct access and egress arrangements for both the Ilac Centre and permitted Dublin Central Development.

2.6.7 The provision of a reasonable level of vehicular access was a key issue in the planning of Dublin Central and access for car bourn customers for all areas of the city and surrounding counties was and remains central to the economic viability of the scheme. The approved development also included for 700 no. parking spaces as necessary for the overall viability of the development. Accessibility to these spaces is vital as customers will be drawn from all parts of Dublin City and beyond the city.

2.6.8 ILTP Consulting on behalf of the Dublin Central project team engaged with both the RPA and Dublin City Council in the planning of the Luas Cross City BXD line. These negotiations ensured that Luas tracks were placed to the north side of Parnell Street and the all movement Moore Street / Parnell Street junction was maintained.

2.6.9 Access to the existing car parking adjacent to the Ilac Centre is crucial to the commercial viability of the Centre.

2.7 Summary

2.7.1 Access by all modes of travel to the Tier 1 Retail Core is essential, but it is particularly important for Upper O'Connell Street and the surrounding area, which is in urgent need of rejuvenation. The permitted Dublin Central development in tandem with the Ilac Centre will be a major catalyst in the rejuvenation of the area, which will be complimented by the already thriving retail core surrounding Henry Street, including the Ilac Centre.

2.7.2 Vital to the success of this Dublin Central scheme is ensuring good access by all travel modes. Access to the development by car based shoppers for a wide catchment area was and remains an essential and vital component in ensuring the development progresses. Similarly maintaining good levels of accessibility to the existing Ilac Centre is key.

3 REVIEW OF THE ILAC CENTRE AND DUBLIN CENTRAL, BXD LUAS LINE AND METRO NORTH PERMISSIONS

3.1 The Ilac Centre

3.1.1 The Ilac Centre is a major retail development located on Parnell Street and includes a 1,000 space multi storey car park. The Ilac Centre is located in a key trading area in Dublin City centre, and extends between Henry Street, Parnell Street and Moore Street.

3.1.2 The Ilac Centre attracts over 17.5 million visitors a year, and the footfall to the Centre is now the highest of any building in Dublin City Centre. Key retailers include Dunnes, Debenhams, River Island, H&M, Argos and TK Maxx.

3.1.3 The Centre is approximately 27,000 sq. metres with 85 retail units and 12 kiosks. Including the full extent of Dunnes and Debenhams department stores, Ilac is part of c. 55,750 sq. metres of retail under one roof.

3.1.4 The Ilac Centre forms part of the City Centre Retail Core as identified in the *Dublin City County Development Plan 2011 – 2017* and shown in Figure 3.1 taken from the County Development Plan.

3.1.5 The primacy of the city centre as a shopping development is recognised in the County Development Plan. Objective RD11 states:

> *"To maintain and reinforce the dominant position of the central shopping core as the premier shopping area in the state and to address the challenges and reposition the city as a premier shopping destination, supported by a rich diversity of leisure, cultural and other uses"*

3.2 Dublin Central

3.2.1 The Dublin Central site is located on the northern end of O'Connell Street and extends from Parnell Street to the north to Henry Street to the south. The site is bordered by O'Connell Street, Parnell Street, Moore Lane, Rahilly Parade, Moore Street and Henry Street.

3.2.2 A condition attached to the decision to grant permission required Ministerial Consent for works within the National Monument at 14 – 17 Moore Street to be obtained before the scheme progressed. Ministerial Consent was obtained and compliance with the attached conditions was achieved in July 2014. The project team are tendering the works on the National Monument and it is anticipated to be completed by Easter 2016.

3.2.3 The Dublin Central site also forms part of the City Centre Retail Core as identified in the *Dublin City County Development Plan 2011 – 2017*.

Fig 18 City Centre Retail Core - Principal Shopping Streets.

Figure 3.1: City Centre Retail Core (Source: DCC Development Plan)

3.2.4 The permitted development is c. 123,000sqm and includes approximately 75 retail units, 14 café/restaurant/bar units, a small number of residential units, a commemorative centre, some office space, two new pubic streets, approximately 650 no. bicycle parking spaces and approximately 700 no. car parking spaces.

3.2.5 The Dublin Central development is one of the largest developments ever planned within the state. The scale of the development has the capacity to transform the north inner city. On completion the development will provide employment for thousands of people and greatly enhance the shopping experience in the city centre.

3.2.6 A new east-west pedestrian route from O'Connell Street to Moore Street is provided and a north south pedestrian route from Henry Street to the new east-west route is also provided. This will create a much finer pedestrian network which will benefit the area in general.

3.3 Access to Dublin Central and the Ilac Centre

3.3.1 The Dublin Central Development, due to its scale and prime location in the centre of Dublin City, can be expected to draw visitors from all over the city. The economic viability of the development is premised on attracting visitors from all over the city and by all modes of travel.

3.3.2 As outlined at the Oral Hearing for Dublin Central approximately 20,000,000 visitors to Dublin Central are expected annually. This equates to approximately 55,000 visitors per day. Approximately 10 to 15% of these were estimated to arrive by private car, with the balance arriving by other modes.

3.3.3 The Ilac Centre attracts an average of 17.5 million visitors per year. Recent surveys of customer profiles for the Ilac Centre indicate that 49% of visitors come by public transport, 26% by car, and 23% walk.

3.4 Vehicle Access to Dublin Central and the Ilac Centre

3.4.1 The Dublin Central development is of such a scale and will host retailers that will attract visitors from all areas of the city, but also beyond the city. These visitors may not be able to rely on public transport and will in some cases use, as the only practical alternative private cars.

3.4.2 Permitted Car park vehicular access and egress is via Rahilly Parade from Moore Street via an all movement junction at Parnell Street.

3.4.3 Deliveries are to be one-way via Parnell Street, Moore Street, O'Rahilly Parade and Moore Lane and shall exit the service yard one way via Moore Lane onto Parnell Street.

3.4.4 Exiting vehicles can also use this all movement junction at Moore Street or via a left only exit from Moore Lane onto Parnell Street.

3.4.5 An all movement junction at Parnell Street is vital as this allows traffic into and out of Dublin Central development travel relatively directly to all areas of the city. The approved access arrangements are shown in Figure 3.2.

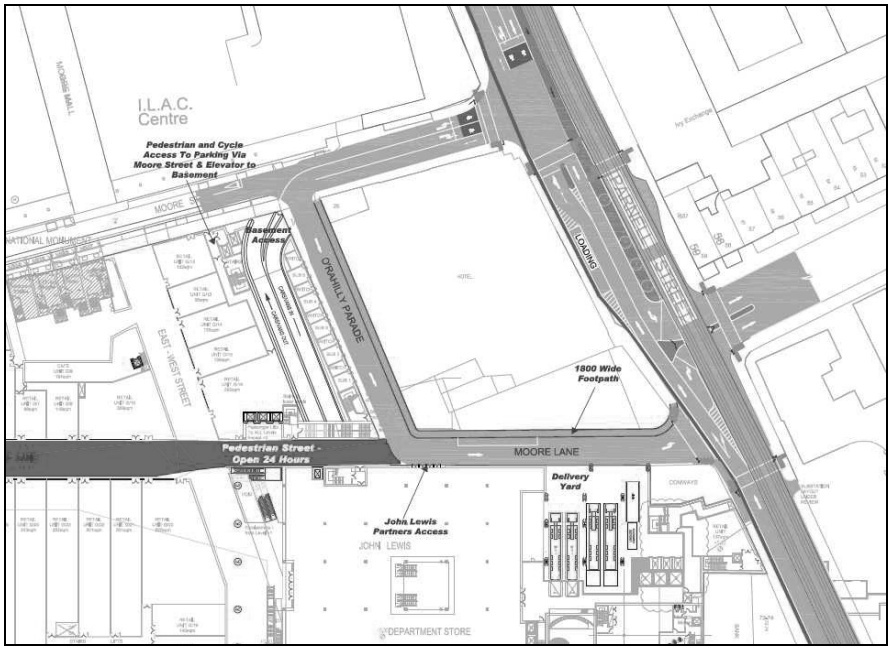

Figure 3.2: Approved Dublin Central Access and Egress Arrangements with Luas BXD in place

3.4.6 Existing access to the Ilac Centre car park is off Parnell Street.

3.5 Cordon Count Results

3.5.1 The number of people accessing the City Centre and their mode of transport is measured annually in the Canal Cordon survey undertaken by DCC and the NTA.

3.5.2 Figure 3.3 shows the results of this survey over the last 8 years for a typical weekday. This shows that in overall terms the total number accessing the city by all modes decreased, which is to be expected given the overall economic downturn in recent years. Fortunately there has been some increase in recent years and this trend in likely to continue as economic growth is re-established.

3.5.3 The cordon results show some decrease in private car and a significant and surprising drop in public transport usage. The only modes to show any significant increase were taxi and cycle over the period. There was a notable drop in Goods vehicles during the period and this is likely to have been exaggerated by the virtual collapse in construction activity in recent years.

3.5.4 For public transport there is a very noticeable drop in rail patronage and to a lesser extent in bus patronage. LUAS levels have increased slightly but this should be expected given the extension to City West, Cherrywood and the Point over that period.

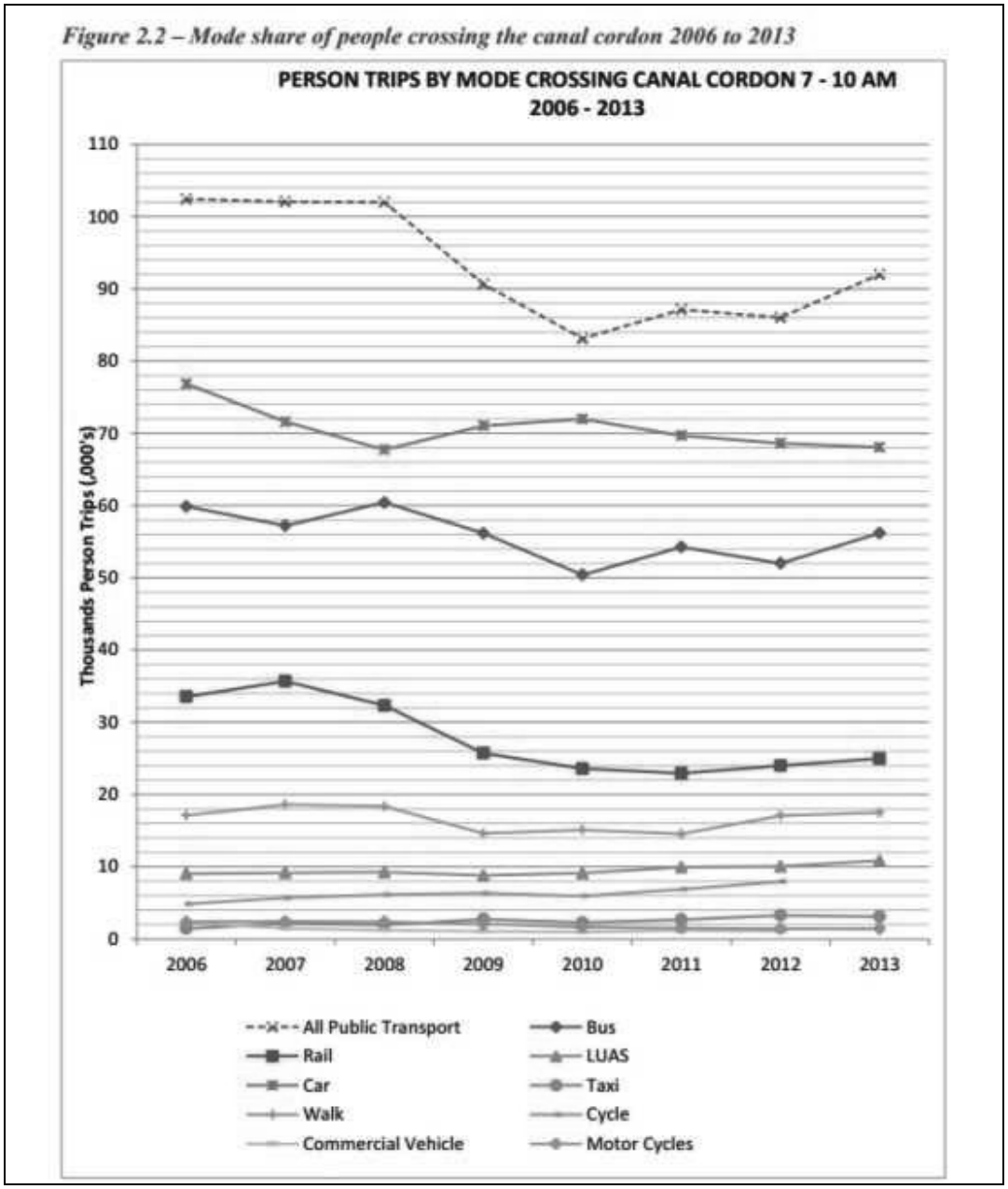

Figure 3.3: Canal Cordon Survey Results 2006 – 2013 (Source: NTA)

3.5.5 The results show that despite ongoing investment in public transport, its overall mode share has in fact decreased during this period. This demonstrates that despite recent investments in rail signalling, increases to LUAS network and ongoing improvements in Bus Priority and technology advance, public transport has failed to deliver any real increase in either overall carrying capacity or mode share.

3.5.6 The data also suggests that the existing public transport has the capacity to deliver far greater numbers of passengers using the existing infrastructure. ILTP estimate that the existing public transport could deliver between 10,000 and 20,000 additional capacity using the current infrastructure. We therefore urge the NTA to undertake a review of existing PT usage and performance with the view of maximising the use of existing infrastructure before embarking on further capital projects.

3.5.7 We also note a proposal by DCC and NTA to implement a trial involving the removal of cars and buses from College Green, planned for next year, on a number of Sundays. We would suggest that these are extended to include Friday PM peak also to see the impact of such a proposal if introduced on an all day basis. Given the far wider implication of the changes proposed in the BRT Scheme, we would also urge that any decision on progressing with BRT be deferred until the outcome of such trials are known.

3.6 Importance of Car Access for Shoppers

3.6.1 Goodbody Economic Consultants studied the impact of access on shopping in the city centre on behalf of Dublin City Council in 2009. This study found that 19.5% of shoppers access the city centre by car and are responsible for 37% of shopping in city centre retail areas. The study found that on average customers arriving by car planned to spend approximately €118 compared to €49 by other city centre shoppers.

3.6.2 An increase in access restrictions and in journey time caused by traffic movement restrictions resultant from the proposed BRT will impact negatively on spending in the City Centre and damage the viability of the Dublin Central development in particular.

3.6.3 In overall term between 10% and 15% of shoppers to the proposed Dublin Central Development are anticipated to arrive by private car. However the spend profile means that they will account for between 20% to 30% of turnover. Any notable reduction in car accessibility could significantly undermine the viability of this development.

3.6.4 Furthermore, 26% of visitors to the Ilac Centre currently travel by car.

3.7 BXD Cross City Luas Scheme Evaluation Process

3.7.1 The BXD Cross City Luas line was approved in August 2012 (Ref. 29N.NA0004). The BXD Cross City Luas line is currently under construction and is due to open in Autumn 2017.

3.7.2 The Luas Cross City route connects the Luas Green Line from St. Stephens Green with the Luas Red Line at Abbey Street and interchanges with rail services at Broombridge. The trams are to be 43m in length and will have a capacity for 310 people.

3.7.3 A Luas stop will be located northbound on O'Connell Street close to the junction with Cathal Brugha Street and adjacent to the Dublin Central Development. Southbound Luas stops will be located on Parnell Street East and on Marlborough Street. There will also be a northbound and southbound stop on Dominick Street close to the junction with Parnell Street, which will be convenient to the Ilac Centre.

3.7.4 The approved BXD Cross City LUAS currently under construction and the associated changes to the road network were not shown in separate BRT drawings published for public consultation. The failure to do so makes it difficult to disaggregate the impacts of the approved BXD Luas Cross City Line and the proposed BRT. The failure makes it much more difficult for members of the public or stakeholders to comment on the base year scenario, with or without the proposed BRT in place.

3.7.5 The process of identifying the emerging preferred route for the LUAS BXD scheme was described in the EIS. This is described in Section 6, the 'Alternatives' section of the EIS

3.7.6 Options A – E were identified in the EIS. Option A was initially proposed as the preferred route. Option A proposed to route north and southbound Luas services on O'Connell Street. This was then modified as outlined in the EIS:

> *"In consideration of the feedback from consultation on the Route Options A– E and the concerns expressed by stakeholders with respect to the impacts on the newly completed O' Connell Street refurbishments, a revised proposal for Route Option A was developed following consultation with DCC, BAC and other key stakeholders. These concerns revolved around the necessary provision of a track crossover within the O' Connell Street median in the GPO Plaza and the requirement to permanently set back the O' Connell Street footpaths. The revised Route Option A is illustrated in Figure 6.9."*

3.7.7 The revised Route A continued to route services north and south on O'Connell Street. This was then modified further for reasons as stated in the EIS.

> *"Further to discussions with DCC, BAC and other key stakeholders, a sixth route option emerged in tandem with the development of the revised Route Option A which sought to address some of the remaining difficulties associated with Route Option A. This route corridor option became known as Route Option F and is illustrated in Figure 6.10."*

3.7.8 Route F routes services northbound via O'Connell Street and southbound via Marlborough Street and is the alignment which was subsequently approved. The EIS states with regard to Option F:

> *"It represents a more feasible operating environment for a tramway and although it would be more expensive to implement, the wider accessibility to the system is of greater attraction to future users. It has the potential to act as a catalyst for the future regeneration of the northeast inner city area and in particular Cathal Brugha Street and Marlborough Street."*

3.7.9 During the pre-planning phase of the proposed Dublin Central Development, meetings were held with the LUAS Cross City BXD Project Teams and Dublin City Council Roads & Transportation Departments, during which the appropriate integration of the proposed LUAS proposals with Dublin Central Project was developed.

3.7.10 These meetings resulted in the LUAS on Parnell Street being located to the north side of the carriageway and an all movement junction at Moore Street / Parnell Street to / from the Dublin Central Development being provided.

3.7.11 ILTP are currently in discussion with DCC and RPA on the detailed junction design and the discharge of the planning conditions in respect of the Dublin Central project. This demonstrates the commitment of our clients in working with DCC and the transport agencies on finding mutually agreeable solutions that will benefit all stakeholders to promote the redevelopment of the city centre.

3.8 Metro North Project

3.8.1 The Metro North Rail Order was approved in 2010 (Ref. 06F.NA.0003). This approved a Metro from St. Stephen's Green to Swords via the city centre, where it would be tunnelled. Metro Stations are to be located at O'Connell Bridge and Parnell Square in the vicinity of the Dublin Central development and the Ilac Centre.

3.8.2 In 2011 the Government published the *Infrastructure and Capital Investment 2012 – 16: Medium Term Exchequer Framework*. This stated with regard to Metro North:

> *"In the context of reduced resources, larger public transport projects proposed for the GDA (such as Metro North and DART Underground which were to be advanced as PPP projects, but which require very significant Exchequer contributions) cannot proceed at this time. They are being postponed for consideration in advance of the next capital programme which will be drawn up in 2015 and will cover the period from 2016 onwards. These projects are being deferred, not cancelled: they remain key elements of the overall integrated transport strategy for the GDA and will be progressed when fiscal and market conditions improve."*

3.8.3 The provision of Metro North therefore remains central to Government planning and is to be reviewed next year.

3.8.4 The National Transport Authority continues to view Metro North as necessary. The NTA report *Bus Rapid Transit Core Dublin Network (2012)* states:

> *"Overall, the link between the city centre and Swords has demand levels that exceed the capacity of a moderate capacity BRT system, in the longer term. While BRT may provide an interim partial transport solution in the shorter term, a higher capacity rail solution, such as a metro, will ultimately be required on this corridor. In light of this, the Swords to City Centre BRT section has not been brought forward to the later costing and appraisal sections of this feasibility study report."*

3.8.5 At present rail services on and in the immediate vicinity of O'Connell Street is limited. The completion of the construction of the Luas BXD line and commencement of services will improve rail services. If the approved Metro North scheme is implemented Dublin Central and the Ilac Centre will have significantly improved rail connectivity.

3.8.6 It is proposed that Metro Stations will be located on Lower O'Connell Street and Parnell Square East as shown in Figures 3.4 and 3.5 respectively.

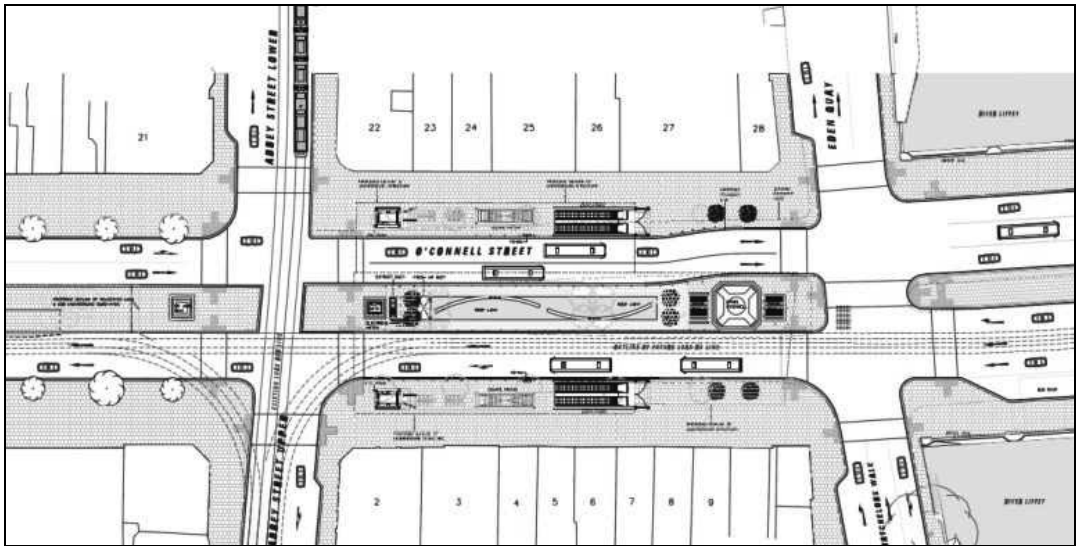

Figure 3.4: Permitted Metro Stop O'Connell Street (Source:RPA)

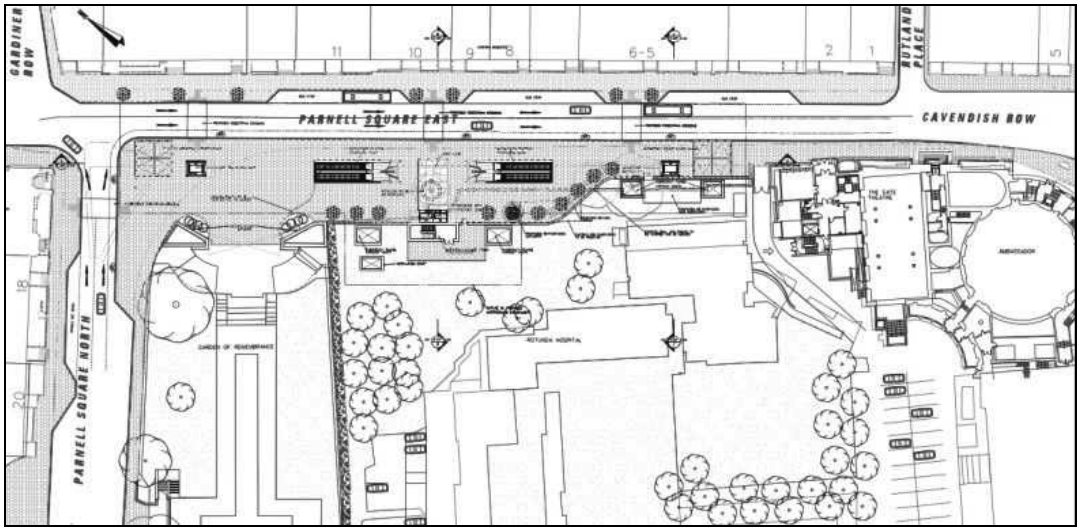

Figure 3.5: Permitted Metro Stop Parnell Square East (Source: RPA)

3.8.7 It is clear that if the proposed BRT scheme proceeds as proposed then it will significantly impact on the current approved Metro North Scheme. Therefore the proposed scheme should include the alternative alignment that the BRT will take if Metro North is to proceed. Also the additional costs associated with same should be included in the BRT scheme.

4 IMPACT OF PROPOSED BRT ON DUBLIN CENTRAL AND THE ILAC CENTRE

4.1 Introduction

4.1.1 The Dublin Central development was planned and granted permission in the context of plans for light rail and metro in the vicinity being progressed. The Dublin Central project team worked closely with the RPA, Dublin City Council and other stakeholders to ensure that Dublin Central would integrate with future planned rail infrastructure.

4.1.2 The provision of a BRT route from Swords to the city centre passing north and south bound on O'Connell Street was not mooted or foreseen when the Dublin Central project was being planned.

4.1.3 As such the impacts a BRT scheme might have on the Dublin Central project and the Ilac Centre were not previously considered. The analysis of the BRT proposals currently on public display and the wider transport context has revealed a number of issues of major concerns.

4.2 NTA Assessment Failed to Consider Alternatives Adequately

4.2.1 The alternatives to the proposed BRT as stated in the *Route Options Assessment Volume 1 Main Report* are:

- a) Do-Nothing,
- B) Enhanced QBC (Do Minimum)

4.2.2 The NTA in their 2012 assessment of the *BRT Core Dublin Network* found with regard to the Swords City Centre that, *"a higher capacity rail solution, such as metro, will ultimately be required on this corridor".*

4.2.3 In view of such a conclusion and recent removal of articulated buses from Dublin Bus the option of a Light Rail Route or a Metro should have been included in the consideration of alternatives. The omission of both of these alternatives means that the consideration of alternatives is inadequate.

4.3 Description of Proposed BRT Scheme

4.3.1 As outlined elsewhere in this report the NTA published *Bus Rapid Transit Core Dublin Network* in 2012. This report identified three BRT routes, two of which might potentially impact directly on Dublin Central; Swords to Tallaght and Blanchardstown to UCD.

4.3.2 The report concluded the Swords to City Centre BRT section would not be brought forward to the later costing and appraisal sections of this feasibility study report because a higher capacity public transport provision will be required on this corridor.

> *"While BRT may provide an interim partial transport solution in the shorter term, a higher capacity rail solution, such as a metro, will ultimately be required on this corridor. In light of this, the Swords to City Centre BRT section has not been brought forward to the later costing and appraisal sections of this feasibility study report."* (NTA, 2012)

4.3.3 In 2013 the NTA published the *Integrated Implementation Plan 2013 – 2018*. This plan confirmed that the Swords / Airport – Dublin City Centre corridor requires greater capacity, but outlines a significant evolution in NTA policy on the Swords to City Centre BRT.

4.3.4 The 2013 NTA report states:

> *"that while the BRT does not have sufficient capacity to serve this link over the longer term, it would provide an interim transport solution in the shorter term, pending the development of a higher capacity rail solution, such as a metro, on this corridor. It would complement any rail based solution in the long term, and continue to perform strongly in terms of passenger usage."*

4.3.5 The preferred route for the Swords to City Centre was published in October 2014. This shows the proposed BRT travelling north and south on Frederick Street and O'Connell Street and onto Westmoreland Street / D'Olier Street as shown in Figure 4.1.

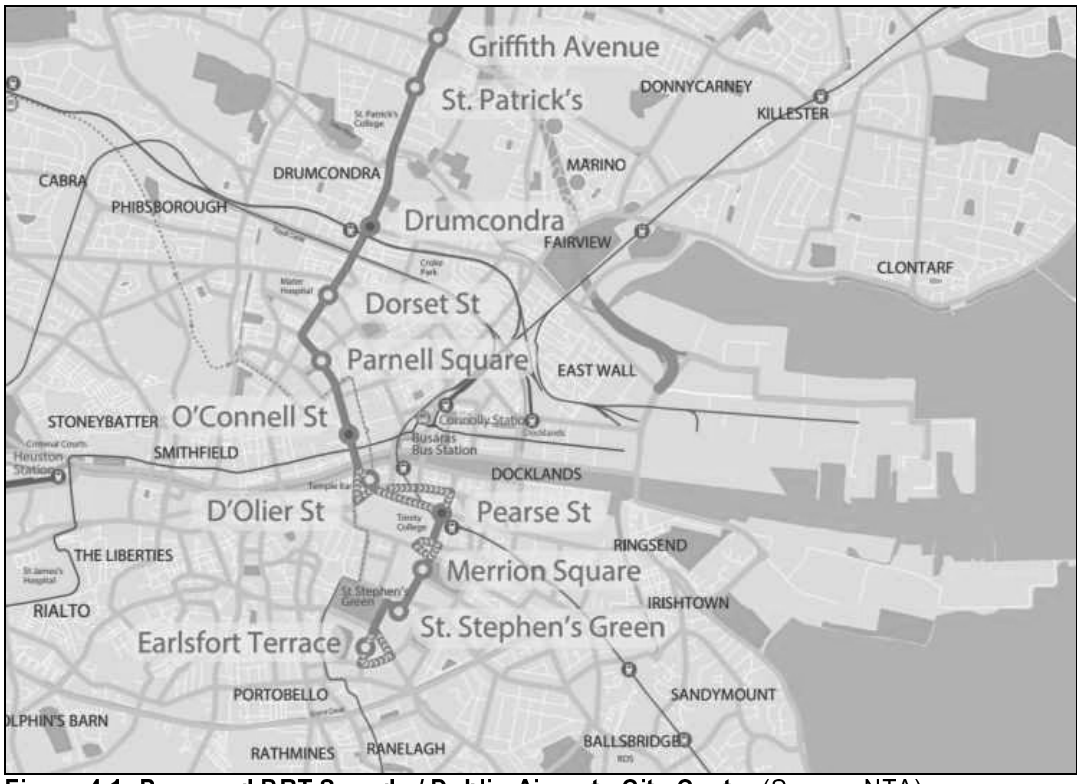

Figure 4.1: Proposed BRT Swords / Dublin Airport - City Centre (Source: NTA)

4.3.6 North and south bound BRT stops are proposed adjacent to the Dublin Central development.

4.3.7 Adjacent to the Dublin Central development O'Connell Street will have northbound a cycle lane, 2 bus / BRT lanes and a Luas. Southbound there will be two shared lanes, a cycle lane and a number of bus stops.

4.3.8 The specific elements of the proposed BRT Scheme that impact most adversely on the Ilac Centre and the permitted Dublin Centre development include:

- Private vehicular traffic will no longer be permitted northbound on O'Connell Street north of Prince's Street North.
- Private vehicular traffic will no longer be permitted southbound on Parnell Square East.
- The existing cycle lane northbound on Upper O'Connell Street is to be removed but this element of the scheme is subject to review.

- The taxi rank located adjacent to the Dublin Central Development and Gresham Hotel is to be removed but no alternative location is shown.
- Existing bus stops are to be retained but locations may vary.
- A bus and traffic lane is to be provided southbound along the entire length of O'Connell Street.

4.3.9 The proposed layout of the BRT Scheme on Upper O'Connell Street is shown in Figure 4.2

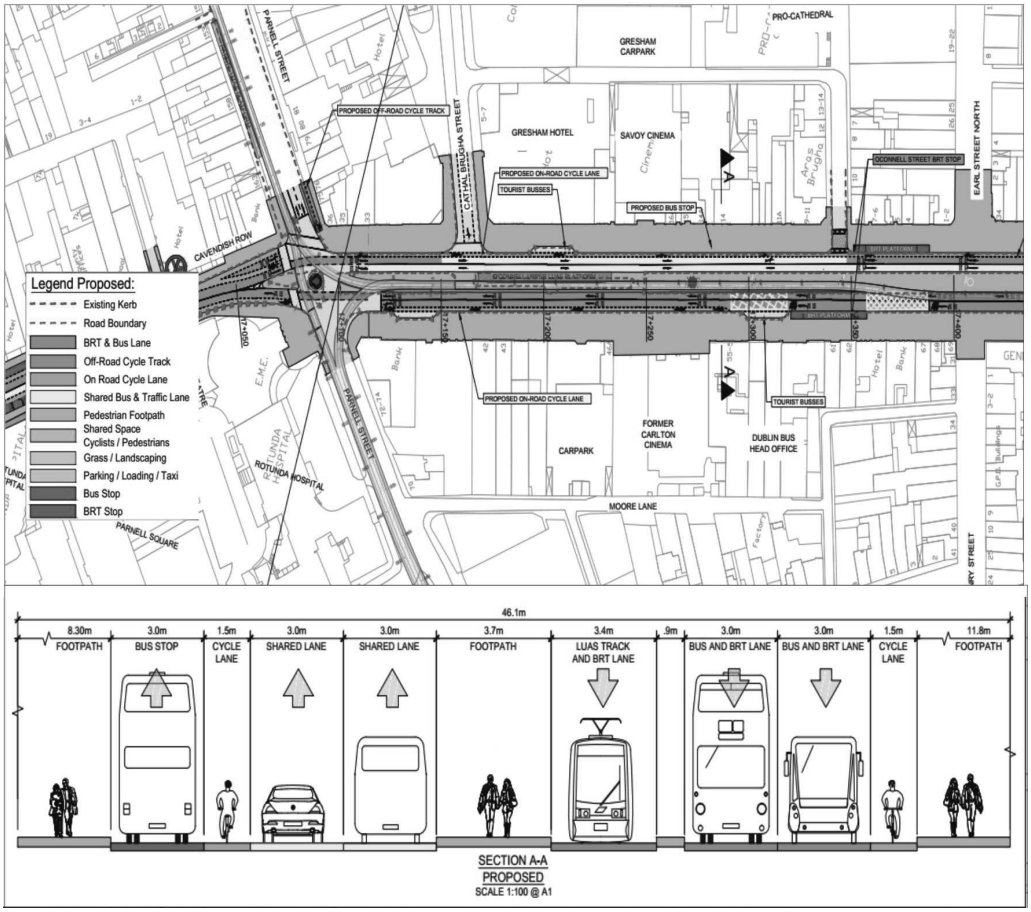

Figure 4.2: Proposed BRT in vicinity of Dublin Central (Source: NTA)

4.4 Proposed BRT Project Patronage by NTA

4.4.1 The boarding, alighting and loading for the preferred scheme are reproduced below for the proposed BRT for the design year 2033. These AM boarding, alighting and load projections north and southbound in the *Route Options Assessment Volume 1: Main Report* are shown for 2033 in Figure 4.3 and 4.4.

4.4.2 A comparison between the opening year and design years appears to reveal a simple extrapolation of opening year trends. This suggests that the modelling has not captured future growth patterns or new developments such as Dublin Central or other zoned lands along the route, which could underestimate the patronage of the scheme. Increased patronage on a limited capacity scheme would mean that its useful duration to meet passenger demand would be far shorter than projected.

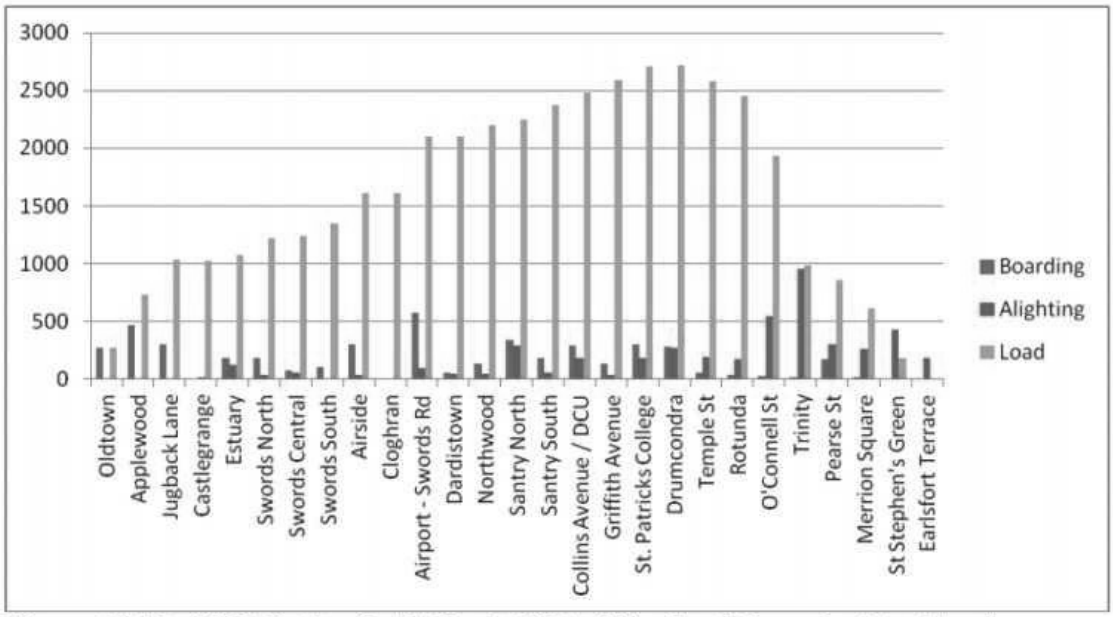

Figure 10.16: 2033 Option 2 AM Peak (08 to 09) – Southbound – Combined Swords/Airport

Figure 4.3: Boarding, alighting and load projections Southbound (Source: *Route Options Assessment Volume 1: Main Report)*

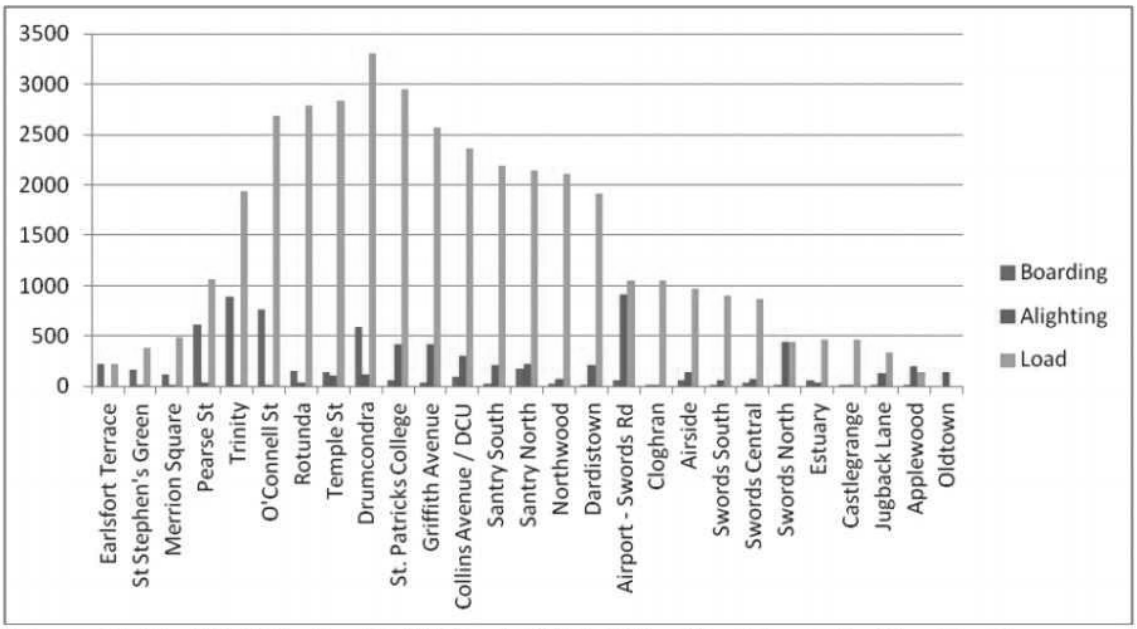

Figure 10.17: 2033 Option 2 AM Peak (08 to 09) – Northbound - Combined Swords/Airport

Figure 4.4: Boarding, alighting and load projections Northbound (Source: *Route Options Assessment Volume 1: Main Report)*

4.4.3 The highest occupancy occurs mid way along the route, with little boarding on southbound from Parnell Square. This would suggest that PT user would instead opt to use the more direct and faster LUAS BXD. This raises the option of terminating the proposed BXD at Parnell Street.

4.4.4 The truncated scheme would bolster patronage on the LUAS BXD, thereby increasing its economic return and would reduce significantly the cost of BXD and eliminate the disruption in the city centre. It would also reduce much of the conflict with the Approved Metro North Scheme. The combined LUAS/BRT would have a very significant catchment along a spine running from Dublin Airport to Cherrywood and would require only a single interchange as illustrated in Figure 4.5.

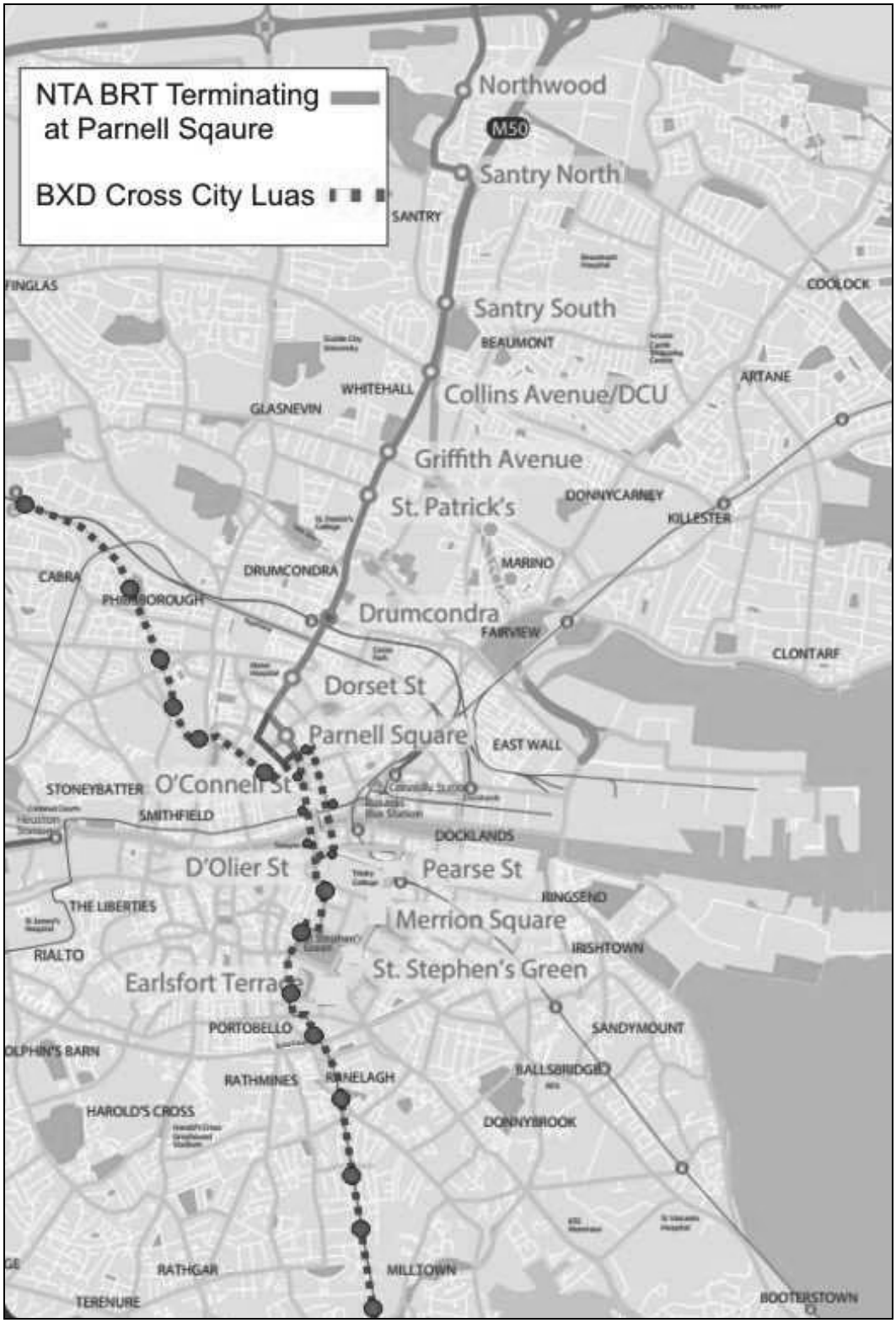

Figure 4.5: BRT terminating at Parnell Square and Interchanging with Luas BXD Cross City

4.5 Impact of Proposed BRT on Private Car Access to the Ilac Centre and Dublin Central

4.5.1 The importance of access to the Dublin Central development from all areas of the city was a key consideration in the planning of the Dublin Central development. As outlined elsewhere in this submission car access to the Dublin Central development is important because of the higher spend by car visitors to the city centre.

4.5.2 The proposed BRT will have a dramatic impact on the allocation of road space and permitted movements of cars along the full extent of the network but particularly in the City Centre.

4.5.3 The impacts of the BRT proposals for accessibility to Dublin City Centre including Dublin Central, the Ilac Centre, the Jervis Shopping Centre and Henry Street will be dramatic.

4.5.4 The ongoing negative impacts on city centre access are all to be incurred to implement a temporary solution which the NTA itself considers as a short to medium term solution

4.5.5 There are a number of important access routes to the Ilac Centre and permitted Dublin Central Development which will be removed by the proposed BRT Scheme. The main restrictions are shown in Figure 4.6.

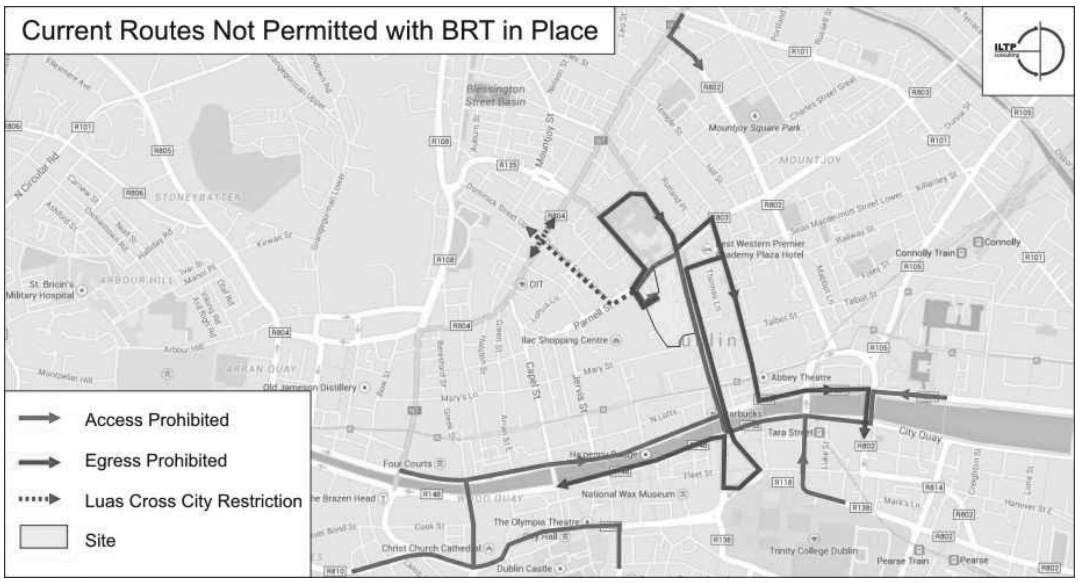

Figure 4.6: Private Vehicle Movement Restrictions

4.5.6 These proposed changes will impact very negatively on route choice and journey time for those wishing to access the Dublin Central development, the Ilac Centre and other adjacent retail areas within the DCC defined retail core. Access and egress from the major traffic route and from the south city area would be very adversely impacted, which in turn would impact significantly on the existing Ilac Centre and permitted Dublin Central Developments.

4.6 Impact of Proposed BRT Construction Traffic

4.6.1 It is estimated by the NTA that the construction of the proposed BRT will take approximately 2.5 years. The proposed BRT will have very significant construction impacts on an ongoing basis. In the immediate term this will impact negatively on businesses located adjacent to the proposed BRT as it becomes more difficult to access businesses.

4.6.2 There is also a longer term impact as people change travel routes and shopping patterns in order to avoid the construction works altogether. The Luas BXD line is currently under construction. If the proposed BRT is approved and constructed then construction works on the two schemes will most probably be ongoing in the city centre from 2013 to 2017 / 2018.

4.6.3 Such a prolonged period of ongoing significant construction and road restrictions will alter customer behaviour and deter some people from accessing the city centre.

4.6.4 The possible future commencement of Metro North construction would further exacerbate this problem.

4.7 Proposed BRT Parking Overlay / Terminus

4.7.1 There is no BRT parking area or Terminus shown in the *Proposed Scheme General Arrangement Drawings.*

4.7.2 *The Route Options Assessment Volume 1 Main Report* states the following with regard to a terminus:

> *"Terminus: To minimise the amount of 'dead running' by the Swiftway vehicles, a Swiftway terminus facility needs to be located close to the final stop on the route. A Swiftway terminus will typically facilitate temporary vehicle layover with parking for three vehicles. A dwell time of about 5 minutes per Swiftway vehicle is anticipated at the terminus facility. A welfare facility is required to accommodate Swiftway drivers during the layover time. This layover time will facilitate comfort breaks for drivers, let drivers carry out quick inspections of the vehicle if required and allow scheduled headways between Swiftway vehicles to be maintained. For the proposed scheme a terminus will be located at the northern end of the route. It is not proposed to facilitate a terminus facility in the City Centre."*

4.7.3 The omission of a terminus or layover at the city centre end of the service will make the maintenance of scheduled headways difficult to achieve at all times.

4.7.4 It is probable that BRT or Bus services, particularly northbound, will have to park or stop for a number of minutes in the city centre to maintain scheduled headways.

4.7.5 A likely location for this parking and / or stopping for a few minutes is at locations where there are two BRT / bus lanes together, such as northbound on O'Connell Street. The proposed arrangement on O'Connell Street has the potential to increase the number of buses parked on the street and impact very negatively on the visual quality of a street of such major national importance.

4.7.6 The design detail shows that the proposed BRT stop forms a 'traffic plug' on Parnell Square. Therefore all vehicles including buses and taxi would be stopped while BRT vehicles are loading or unloading passengers. In the event of a BRT breakdown at a stop significant congestion would arise.

4.8 Impact on Cyclists and Pedestrians

4.8.1 The first objective of the proposed BRT as stated in the *Route Options Assessment Volume 1 Main Report* is:

> *"To deliver a high quality public transport service along the Swords/Airport to City Centre corridor, encompassing all aspects of BRT, including BRT lanes*

and associated pedestrian and cycle facilities along the route, Swiftway vehicles, operational standards and customer service"

4.8.2 No comprehensive analysis of the impacts of the NTA proposed BRT on cyclists and pedestrians has been undertaken.

4.8.3 The provision of the proposed BRT will have directly negative impacts on pedestrians and bicyclists. The BRT as proposed includes:

- Introduction of 18m – 26m vehicles on the city road network
- Reduced footpath width
- Increased road carriageways
- Removal of pedestrian footbridges

4.8.4 The dangers to cyclists posed by articulated vehicles have long been acknowledged internationally and the almost complete removal of articulated lorries from the City Centre is regarded as one of the key benefits of Dublin Port Tunnel.

4.8.5 The proposed BRT will increase the number of articulated vehicles in the city centre. By virtue of their size the BRT buses will act a as a deterrent to existing and potential cyclists.

4.8.6 We also note that the cycle lane provision on O'Connell Street is not yet resolved and we may wish to comment further on this once details are available.

4.9 Management of Proposed BRT Network

4.9.1 There are a number of items pertaining to the management of the proposed BRT network which have not been defined. The failure to provide information on these items makes a full analysis of the proposed BRT impossible. Among the issues which have not clarified andwhich our Client would like to reserve the right to comment further are:

- It is not clear if the BRT lane will be used by private buses.
- It is not clear if the BRT lane will be used by taxis.
- Responsibility for the management of traffic signals including SCATS is not clearly defined.
- Responsibility for the post construction maintenance and upkeep of the proposed BRT network is not clearly defined.

4.10 Management of Proposed BRT

- The provision of funding of BRT vehicles has not been identified.
- The body responsible for the operation of BRT services has not been identified. While Dublin Bus may operate the service it is so far not certain that this would be allowed under EU rules and the plans to privatise 10% Dublin Bus routes
- It is unclear if the NTA, DCC or other party will own the BRT traffic lanes post construction.
- Who would be responsible for any future changes in traffic management requirement to facilitate new development?

4.10.1 Cumulatively there is a high level of uncertainty about how BRT services are to be delivered and managed. This requires clarification

4.11 Cumulative Impact – Additional Proposed BRT Routes

4.11.1 Initial emerging routes for three proposed BRT routes including the Swords / Dublin Airport to the City Centre published in February 2014.

4.11.2 The other routes are the Blanchardstown to UCD route and the Clonliffe to Tallaght route.

4.11.3 The emerging preferred route for the Blanchardstown to UCD included O'Connell Street in the Study area but showed a route in the city centre which avoided the O'Connell Street / Henry Street area and crossed the Liffey at Smithfield.

4.11.4 The preferred route for the Blanchardstown to UCD BRT has not been published. It is not known if the preferred route will differ from the emerging preferred route and therefore if the Blanchardstown to UCD BRT will impact directly on the Ilac Centre and the Dublin Central development.

4.11.5 The emerging preferred route for the Clonliffe to Tallaght crosses O'Connell Street eastbound at the Quays. The preferred route for the Clonliffe to Tallaght BRT has not been published.

4.11.6 It is not known if the preferred route will differ from the emerging preferred route and therefore if the Clonliffe to Tallaght BRT could impact further on the Ilac Centre and the Dublin Central development.

4.11.7 The cumulative impact of the full BRT network is not known. However the additional routes could further impact on the Ilac Centre and permitted Dublin Central development. Therefore the full BRT network should be published so that the cumulative impacts can be assessed by our clients and commented on if necessary, before this particular scheme progresses to the planning stage.

4.12 Planning Blight Potential and Wider Policy Consideration

4.12.1 Prior to construction work commencing on the proposed BRT a number of further steps have to be undertaken:

- Completion of Scheme Design
- Environmental Assessment
- Completion of CPO
- Oral Hearing
- Procurement of Funding Approval
- Infrastructure and Fleet procurement

4.12.2 In addition to all these steps the NTA have estimated that construction will take 2.5 years.

4.12.3 At this point the NTA estimate the BRT will commence services sometime in 2018. Such a timeline does not accord with recent experience of other transport and major infrastructure projects in Dublin City Centre.

4.12.4 Metro North was granted permission in 2010, construction has not yet commenced and will not commence until 2016 at the earliest.

4.12.5 The BXD Cross City Luas line was approved in 2012 after years of planning and is not projected to commence services until 2017.

4.12.6 Given the delays which have characterised other large scale transport infrastructure projects in the City Centre the NTA timeline is optimistic and it can be expected if the project proceeds construction work will not be completed until 2019 / 2020 at the earliest.

4.12.7 Most significantly the proposed BRT should not proceed until funding is in place. The approval of a scheme with no funding in place may hinder development in the city centre due to uncertainty on access, as is evident on other development projects. The NTA assessment appears very confined and single issue focused. In the scheme appraisal the NTA should therefore have regard for wider Government and DCC Policies which seek to promote urban rejuvenation and employment.

5 REVIEW OF SAMPLE BRT SCHEMES AND PREVIOUS EXPERIENCE WITH ARTICULATED BUSES

5.1 Introduction

5.1.1 Bus Rapid Transit schemes have developed over the last 30 – 40 years as a medium capacity public transport route.

5.1.2 BRT is often presented as a cost effective alternative to rail or light rail and has therefore often been linked with developing countries. The city of Curitiba in Brazil is generally regarded as a pioneer in the development of BRT systems and introduced the Rede Integrada de Transporte, in 1974.

5.1.3 Since then there has been a gradual increase in BRT schemes, particularly in South America, Asia and increasingly in developed cities in Europe.

5.1.4 Key elements of a BRT system are:

- The Running Way – Level of priority for BRT Vehicles, whether system is open / semi-open / closed
- Stations / Stops – Include shelters, real time information, ticket machines, CCTV, etc
- Branding – Separate unique brand identity for infrastructure and / or buses
- Travel Time – Reduced and more reliable journey times
- Capacity – Greater capacity than regular bus service, 2,500 – 5,000+ ppdph
- Accessibility – Greater accessibility for mobility impaired users than regular bus services

5.1.5 There is significant variation in the existing transport network, implementation and success of BRT schemes worldwide.

5.1.6 The most important factor is the degree to which the system is separate from the existing road network and the level of priority for the BRT. Some systems are closed meaning the BRT operates on a separate roadway with full priority. Such a system has the highest capacity and the lowest travel time. A closed system is the most expensive to construct.

5.1.7 The system proposed in Dublin is not closed and is described by the NTA as “semi-open”.

5.1.8 ILTP have undertaken a preliminary assessment of existing BRT networks. The assessment has focussed on cities of an approximately similar scale and income level.

5.2 Brisbane

5.2.1 Brisbane Metropolitan area has a population of 2.2m. The city has invested significantly in BRT in the last 10 – 15 years. The busway network is approximately 25km of grade-separated bus only corridors.

5.2.2 BRT stops are of a high standard with real time information, CCTV, ticket machines, bicycle parking and storage.

5.2.3 Articulated buses are not used in Brisbane. Two axle buses with a capacity for 62 no. passengers are commonly used.

5.2.4 Ridership has increased hugely over the last decades and is currently in the order of 70 million per annum.

5.2.5 The success of the BRT network is now causing capacity issues. Buses can now get backed up at pinch points such as bridges. During peak hours there can also be congestion in the Central Business District and some streets can be filled with buses.

5.2.6 In order to address these issues there are now suggestions that a city centre section of the BRT be routed underground.

5.2.7 Interestingly Brisbane Airport which handles handles 20 – 25 million passengers and can be considered very similar in size to Dublin Airport is served by rail rather than BRT services. The airport is served by the Brisbane Airtrain, which provides a rail service from Brisbane's city centre to and from the airport.

5.3 Ottawa

5.3.1 Ottawa has a population of approximately 900,000 within the city and 1.2m in the wider metropolitan area.

5.3.2 The Transitway in Ottawa is considered one of the most extensive and successful implementations of BRT worldwide. Services began in 1983. The Transitway consists of approximately 43 km of mainly grade separated bus lanes, using overpasses, bridges and trench highways. The BRT has priority traffic signal controls and therefore are able to travel significant distances without stopping.

5.3.3 There are a number of different vehicle types used for BRT services in Ottawa. These include articulated and double decker buses. The double decker buses have a capacity for 82 seated and passengers and 90 passengers in total.

5.3.4 Stations are of a high quality and 7,000 free park & ride spaces are provided.

5.3.5 The BRT was very successful and achieved by North American standards very high rates of public transport usage. This has caused capacity issues on the network in the city centre area. The network is overloaded with over 175 buses per hour on the downtown section and the BRT platforms being quite congested.

5.3.6 The level of congestion has generated significant debate in the city about BRT and/or Light Rail Transit. There is a feeling that BRT can provide high quality public transport services, but that ultimately in city centre locations capacity issues will arise.

5.3.7 In 2001 a first light rail line was opened on largely existing rail lines. A second LRT line is now under construction with an underground city centre section.

5.4 Articulated Buses in Dublin – Recent History

5.4.1 Articulated buses have already been tried in Dublin. In 2000 / 2001 approximately 20 number articulated buses as shown in Figure 5.1 and similar in size to the BRT now proposed were put in services by Dublin Bus.

Figure 5.1: Articulated Buses Removed from Service in 2010

5.4.2 The use of these buses raised a number of concerns regarding the size of the buses, mounting and alighting from the buses, usage of the rear door and the safety of the service for users and other road users. These buses were gradually phased out and by 2010 all of these buses were withdrawn from service.

5.4.3 In view of the failure of articulated buses in Dublin in the last decade any new consideration of medium to high capacity public transport alternatives should only proceed after an appropriate consideration of their suitability for Dublin.

5.4.4 The Board has alsobeen cognisant of issues with bus based public transport. The Inspector's report on the BXD Cross City Luas states:

> *"The bus based concept was rejected because; it would be less attractive to passengers; light rail would have greater potential integration benefit; and light rail could have a greater effect on commercial investment decision making."*

5.4.5 It would be prudent to first test the existing network using the planned new BRT vehicles so that their suitability could be examined. They could readily be introduced on to one of the existing QBCs and their performance in terms of kinematics, passenger capacity and performance be assessed in advance of further progressing BRT.

5.5 Conclusions

5.5.1 There is little doubt that BRT can deliver medium – high capacity in developing cities. There is great variation in BRT schemes worldwide and key determinants of success include; the degree to which a system is open or closed, and junction design.

5.5.2 In order to deliver real benefits in travel time and comfort BRT require a high degree of priority and the more 'closed' the system is the more likely it is to deliver this.

5.5.3 It is not obvious that the BRT scheme as currently proposed will deliver significant improvements in journey time or passenger capacity.

5.5.4 BRT take up a considerable amount of road space and in city centre locations this can be problematic. BRT requires more space than higher capacity light rail due to alignment, clearance and overtaking facilities at stops. Past experience in Dublin show that articulated buses proved to be unpopular and were withdrawn from service. The patronage figures would suggest that most users of the service would be drawn from existing bus services and that the overall public transport usage might increase very little, despite the costs and potential disruption to other travel modes particularly in the city centre. This would mean that existing bus passengers, who are largely seated, would be asked to transfer to a service where up to 50% would be required to stand.

5.5.5 It is therefore recommended that the proposed BRT vehicle be trialled on one of the existing QBCs to determine if past difficulties experienced with similar vehicles can be overcome.

6 SUMMARY OF MAIN CONCERNS AND MODIFICATIONS PROPOSED

6.1 Introduction

6.1.1 Access from all areas of the city and by all transport modes is vital for the economic viability of the north city retail core, including the Ilac Centre and the permitted Dublin Central project in particular.

6.2 Proposals and Modifications

6.2.1 The current BRT scheme as proposed will have major negative impacts on accessibility to the existing and permitted retail developments located off Upper O'Connell Street unless appropriately modified.

6.2.2 Given that the LUAS Cross City is now under construction and will provide a high capacity PT link between Parnell Square and St. Stephen's Green serious considerations should be given to terminating the BRT at Parnell Square. This would also allow passengers to readily transfer from one PT form to another (LUAS Cross City), without impacting negatively on the city centre core. The indicative patronage of the proposed BRT, south of O'Connell Street, (based on the estimates by the NTA), is significantly reduced.

6.2.3 Given the availability of the more direct LUAS Cross City route to serve this travel need, there is likely to be little overall reduction in overall public transport patronage on the network. There would however be significant scheme cost savings and reduced disruption to all other travel modes in the city centre. This could also enhance patronage (and economic return) on the LUAS Cross City scheme, creating a win, win situation. This alternative option needs to be considered further as it was not one of the Options considered to date.

6.2.4 Similarly the reduced BRT Scheme would not be in significant conflict with the Board approved Metro North Scheme on O'Connell Street or the permitted Dublin Central development. It is noted that there are no costs allowed in the BRT scheme to facilitate the significant changes to the BRT, which would be necessary to facilitate Metro North if it were to proceed.

6.2.5 If the BRT is to continue through the city centre then alternative routes should be considered as occurred in the case of LUAS Cross City. This should avoid the over concentration of public transport services on the O'Connell Street – St. Stephen's Green axis.

6.2.6 At a minimum ILTP are proposing that the proposed BRT through the city centre should use shared running with the LUAS Cross City northbound on O'Connell Street. A general traffic lane should be retained on O'Connell Street northbound.

6.2.7 A southbound BRT lane could be accommodated on O'Connell Street. Shared running on Marlborough Street is another option, which would utilise the recently constructed Rosie Hackett Bridge, a dedicated PT, cycle and pedestrian facility. This would retain essential vehicular access both ways on O'Connell Street.

6.2.8 If the BRT scheme is progressed then the left turn from Dorset Street to Gardiner Street Upper should be retained.

6.2.9 The proposed location of bus stops and taxi ranks also needs to be identified so that the full impact of the proposed BRT can be correctly evaluated and commented on.

6.2.10 The issue of the public realm, particular on O'Connell Street Upper needs more consideration and detailed design. The proposed Dublin Central development is designed to improve permeability and accessibility by all modes of transport and ensure that Dublin Central is well integrated with the local street network. This should be mirrored in any BRT scheme.

6.2.11 The BRT Scheme should not proceed to planning stage unless and until funding is in place and an agreed timeframe for construction is known. The presence of an approved scheme that has no funding in place could result in significant planning/development blight due to uncertainty posed.

6.2.12 The scheme should not go forward to the planning approval stage until the planned trials of traffic management measure in College Green are known. Similarly we would urge that the proposed BRT vehicles are trialled on the existing QBC network, given the poor past experience of articulated bus operation in Dublin City Centre.

6.2.13 Clarification on the ownership, operation and management of the BRT route network is required.

6.2.14 Given the previous experience with articulated buses in Dublin and based on experience elsewhere it would be prudent to first test the planned new BRT vehicles so that their suitability could be determined. They could readily be introduced on to one of the existing QBCs and their performance in terms of kinematics, passenger capacity and performance assessed in advance.

6.2.15 Given the proposed length of the vehicles, (18m to 25m), the fact that up to 50% of passenger could be standing and the long routes proposed, this trial would establish if the BRT scheme as proposed would be suitable to service the needs of Dublin City. The suitability of the vehicles to operate on our narrow and varied streets and how the vehicles would interact with other road users, particularly cyclists and pedestrians would also be established.

6.2.16 The proposed location of bus stops and taxi ranks also needs to be identified so that the full impact of the proposed BRT can be correctly evaluated and commented on.

6.2.17 The issue of the public realm, particular on O'Connell Street needs more consideration and detailed design. The proposed Dublin Central development is designed to improve permeability and accessibility by all modes of transport and ensure that Dublin Central is well integrated with the Ilac Centre and the local street network.

7 SUMMARY AND CONCLUSION

7.1 Background

7.1.1 ILTP have been appointed by the Ilac Centre and CLL to advise them on the likely impacts of the proposed Swords / Airport to City Centre BRT and to prepare a submission on any proposed modifications deemed necessary and appropriate to the scheme.

7.1.2 The Ilac Centre is a major retail attraction located off Parnell Street and Henry Street and the associated car parking and access to same is very important to the success of the Centre.

7.1.3 The Dublin Central site is located on the northern end of O'Connell Street and extends from Parnell Street to the north to Henry Street to the south. The site is bordered by O'Connell Street, Parnell Street, Moore Lane, Rahilly Parade, Moore Street and Henry Street and is adjacent to the Ilac Centre.

7.1.4 ILTP have worked with both the Ilac Centre and CLL over a number of years on the Dublin Central development and on providing improved access to the Ilac Centre. ILTP have also been involved in preparing submissions and undertaking detailed design discussions with DCC and RPA in ensuring that other proposed public transport schemes are appropriately designed and to ensure that as well as providing improved PT infrastructure the accessibility to this key retail area is maintained and improved.

7.1.5 The Ilac Centre and CLL have very actively engaged with DCC and the RPA in the past to ensure that the rejuvenation of O'Connell Street as a Tier 1 retail core, attracting visitors from all parts of the city and beyond, could happen in tandem and supportive of improved accessibility to the area by all travel modes including public transport.

7.1.6 Through the consultation stage of the LUAS BXD Cross City and the Metro North Scheme active engagement with DCC and the RPA meant that the schemes were suitably modified so that public transport provisions and the regeneration of the retail core could coexist.

7.1.7 We would on behalf of our clients The Ilac Centre and CLL to continue to work with DCC and the NTA in developing a public transport and accessibility strategy that would see enhanced access to the city centre in a manner that promotes and foster the competitiveness of the City Centre as the primary retail destination in the State and promotes the rejuvenation of Upper O'Connell Street.

7.2 Summary of key Issues of Concern

7.2.1 The removal of general vehicles from O'Connell Street northbound is particularly significant as it will reduce options and increase travel time for those accessing the existing north city retail core from the southern part of the city.

7.2.2 Upper O'Connell St northbound is to have two bus lanes and a Luas line and no provision for general traffic if the BRT proposals are implemented, which is disproportionate and not necessary for BRT to be accommodated.

7.2.3 The approved Metro North cannot be physically built if the BRT as currently proposed is first constructed. It is not clear that there will be sufficient passenger demand for a BRT and Metro on essentially the same route to justify the level of investment required. This may also deter private funding for a Metro, which will have to compete directly with a BRT for ridership.

7.2.4 The impact of having approved BRT and Metro North at varying stages of planning and with varying degrees of certainty regarding delivery could cause planning blight in O'Connell Street and the environs and deter investment into the rejuvenation area.

7.2.5 The proposed BRT should not proceed further until funding is in place and/or a decision on whether or not to proceed with Metro North is made by Government.

7.2.6 There are also a number of items pertaining to the ownership, management of the proposed BRT route, and services that need to be clearly defined.

7.3 Conclusion

7.3.1 Proposals to improve accessibility by all modes to the city centre and the Upper O'Connell Street area in particular are generally welcome. Our clients The Ilac Centre and CLL have a proven track record in working with DCC and RPA in ensuring that this has occurred in the past. The current BRT proposals could if not appropriately modified have a major negative impact on this part of the City Centre. The suggested alternative of terminating the BRT at Parnell Square and other proposed modifications contained in this report should be regarded as preliminary only as there was insufficient detail and significant uncertainties contained in the Consultation documents to make a full evaluation of the overall scheme impacts as proposed.

7.3.2 Finally our clients, The Ilac Centre and CLL, would like to continue to engage further with DCC and the NTA, as they have done on previous PT schemes to ensure that the Preferred Scheme is appropriately modified to ensure that it is the most appropriate in overall terms having regard to the overall needs of the City Centre and in ensuring that access by all modes is maintained or enhanced.

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:59
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: NTA_Consultation_-_Bus_Rapid_Transit_November_2014.doc

From: Allen Parker
Organisation: Aircoach
Address: Airport Business Park, Dublin Airport, Co Dublin

Comments:
Dear Sir,

Please find attached submission relating to the Swords – Airport – City BRT.

As outlined we urgently wish to engage with the NTA to fully understand these proposals.

We look forward to hearing from you.

Regards,

Allen Parker,
Managing Director,
Aircoach.
00353879598672

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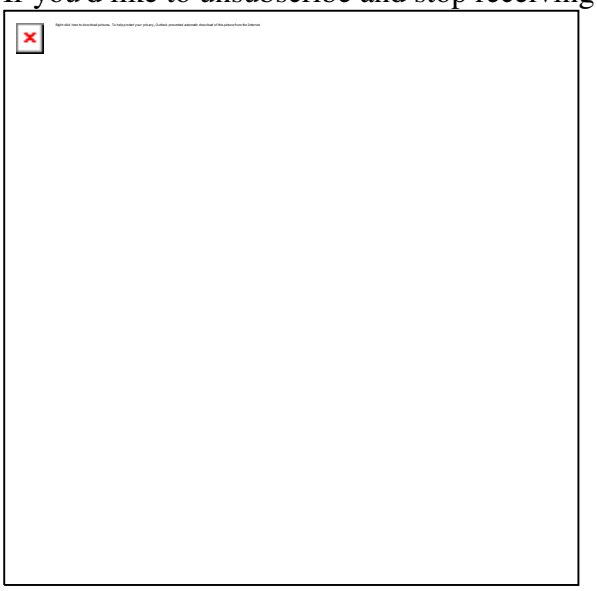

0474b

National Transport Authority

Bus Rapid Transport

Public Consultation

Presented by: Aircoach

Date: November 2014

Aircoach is Ireland's leading private bus and coach operator and provides a range of high frequency, quality scheduled coach services to and from Dublin City Centre and Dublin Airport. Aircoach operates five key services connecting Dublin Airport with Dublin City Centre and its suburbs, as well as non-stop express services connecting Dublin Airport with both Cork and Belfast. Projected passenger numbers in the current year will be in excess of 1.9m passengers.

Aircoach is a 100% owned subsidiary of First Group plc which is one of the world's largest surface transportation companies with turnover of £6.9 billion a year and some 120,000 employees across UK & Ireland and North America.

Our vision is to provide solutions for an increasingly congested world … keeping people moving and communities prospering.

Across the UK and Ireland, First's bus businesses provide approximately 2.5 million journeys a day for customers across a broad range of operating environments. This wide range of services includes commercial urban bus networks, Bus Rapid Transit services, inter urban routes, Park & Ride services, private hire, rail replacement services and further key airport connections including Heathrow RailAir, Glasgow Shuttle, Bristol International Flyer and Stansted Aircoach.

Aircoach has vast experience in operating high quality scheduled bus and coach services and has been instrumental in increasing the level of public transport usage in Ireland over the last 14 years, forecasting to carry in excess of 2 million passengers this year on its high quality services.

Our current services are as follows:

- Dublin Airport – Dublin City Centre – Donnybrook - Leopardstown
  (high frequency 24hr service operating up to every 15 minutes.)
  The only operator providing a 24hr service between Dublin Airport and Dublin City.

- Dublin Airport - Port Tunnel - Blackrock - Shankill - Bray – Greystones
  (24hr service operating hourly)

- Dublin Airport - Port Tunnel - Blackrock – Dalkey - Killiney
  (24hr service operating hourly)

- Cork - Dublin City – Dublin Airport
  (36 services daily non-stop express service)

- Belfast – Dublin Airport – Dublin City
  (44 services daily non-stop express)

Aircoach is committed to providing and developing high quality public transport services that will offer an attractive alternative to the travelling public and has demonstrated over the last fourteen years that it is able to deliver such services.

We are committed to working in partnership with all stakeholders to improve both the range and quality of public transport services in Ireland.

In general, Aircoach supports the concept of Bus Rapid Transit and is supportive of the National Transport Authority's strategy of delivering a high quality, efficient public transport system that will be attractive to the travelling public and that will result in greater usage of public transport and the associated benefits. We are supportive of the view that Bus Rapid Transit has a role in the development of an integrated public transport system for Dublin and that such systems can provide higher capacity on existing busy bus corridors and provide an attractive alternative to car transport, with fast and reliable journey times.

The current public consultation is very much based on requesting submissions in relation to the proposed route alignment for the Swords – Airport – City route. Whilst this is an important element, we believe that a full public consultation is urgently required on the overall business case behind the proposed BRT schemes and we would request that the National Transport Authority issue the full business case proposals behind the BRT schemes as a priority.

In relation to Bus Rapid Transit, Aircoach's parent company, First Group plc (www.firstgroup.com), has extensive experience of developing, implementing and operating BRT services in partnership with a number of different stakeholders. Key examples are in Swansea and more recently in South Hampshire with an award winning BRT service between Fareham and Gosport in partnership with Hampshire County Council

As outlined in our previous submission to the initial public consultation in March 2014, whilst supportive in principle of the BRT concept, Aircoach wishes to urgently engage further with the National Transport Authority to fully discuss and understand the BRT proposals as outlined in the initial public consultation documents. We are disappointed that to date we have received no contact from the National Transport Authority.

As previously outlined we would see this engagement being on a number of levels:

1. Aircoach's parent company, FirstGroup plc, has considerable experience and knowledge in the Bus Rapid Transit area and we would be delighted to share this knowledge and experience to assist in the development of a top quality BRT system for Dublin.

2. We would also appreciate the opportunity to discuss the appropriate operating model for the proposed BRT network. It is our view that a model should be put in place that would provide for the private sector to be given with the opportunity to deliver these services. Given the knowledge, skills and experience that exist within this sector, and to ensure that the provision of these new services is carried out in the most cost effective manner, we believe such a structure is the most appropriate to put in place. We would be very keen to understand the rationale and justification behind the current position as put forward by the National Transport Authority that the operation of this new service will be provided by a direct award contract to Dublin Bus.

3. As you are aware, over the last 14 years Aircoach has operated a 24hr, 7 day week commercial service from Dublin Airport to Dublin City Centre and southern suburbs and has successfully grown and developed the public transport usage on this corridor over this time. In the current year we will carry in excess of 1.5 million customers between Dublin Airport and Dublin City Centre and suburbs and we are the only operator to provide a service 24 hours per day, 7 days per week. These services are provided at zero cost to the State, receiving no subvention, either in the way of operating cost support or capital support to purchase assets.

   As previously requested we wish to immediately engage with the National Transport Authority to fully understand the detail behind the BRT proposals on this corridor. In particular, we would appreciate if you could provide detail of the full business case to support the proposal to operate a dedicated BRT service from Dublin Airport to Dublin City Centre.

   We would like to understand the potential implications the introduction of the proposed Airport BRT service may have on our existing commercial service. Whilst limited information is currently available, and we do need to engage to fully understand the proposals, it would appear that the proposed Airport – City Centre BRT proposal will be a direct replica of our existing commercial operation, targeting the same market segments. Such a proposal is likely to have significant implications for the financial viability of our existing commercial service which we need to fully understand. As you are aware our existing services operate with zero State support, whilst the proposed Airport – City BRT service is likely to be at a significant cost to the tax payer, both in terms of capital costs to purchase vehicles and on-going operating cost support.

We look forward to playing a full role in the planning and development of the proposed Bus Rapid Transit system and look forward to discussing the proposals in more detail in order fully understand the details of the proposals, including the full business case, so we may provide a comprehensive response to the statutory consultation process on the overall scheme.

We look forward to hearing from you in the near future in order to discuss the Bus Rapid Transit proposals in more detail.

Regards,

Allen Parker,
Managing Director,
Aircoach.

Tele: 00 353 87 9598672

Email: allen.parker@aircoach.ie

Aircoach
November, 2014.

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:57
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: NTA_Submission__Q_Park_Ireland_Nov_2014.pdf

From: Raymond Peers
Organisation: Q-Park Ireland
Address: Head Office, Marlborough Street, Dublin 1

Comments:
Please find attached formal submission regarding this proposal.

--
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Q-Park Ireland
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W. www.q-park.ie

National Transport Authority

Dún Scéine

Harcourt Lane

Dublin 2

25.11.2014

Dear Sir/Madam, **Re: Bus Rapid Transit (BRT) plans for Dublin City Centre**

I am writing to inform you that Q-Park Ireland is very much opposed to the proposed Swiftway BRT – Swords/Airport to City Centre Scheme as it is currently proposed. As one of the leading off-street parking operators in Dublin who have invested over €16m in refurbishing our car parks in Dublin since 2007, we are very much concerned about ease of access for car users to the city centre and we feel that the proposed BRT, in its current guise, will turn people away from the city.

We have highlighted below several reasons as to why we oppose the plans;

- BRT will impede on available footpath space detracting from the overall experience for shoppers.
- The proposed NTA route map is creating unprecedented problems for car borne shoppers and business communities within the City.
- The number of route changes is such that we have no confidence that car users will continue to use the city centre as a shopping or business destination.
- Car parks accommodate 16 -18 million cars annually and any significant changes in between visits will break the visitors' habits which, once broken, may never be re-established.
- To prepare a plan for BRT without fully considering other modes of transport, particularly cars, is simplistic in the extreme.
- Is BRT value for money in the present climate?
- Any loss of access to the city centre will drastically effect trade and ultimately the level of rates that can be imposed.
- 90% of public transport will go through O'Connell Street which is wholly unsatisfactory.
- It should be considered very strongly that any effect on the retail and business community may effect Dublin as the centre and economic engine of Ireland

In addition to the above points, we are very dissatisfied with the level on consultation to date with regards to the BRT proposal and I would hope that Q-Park will be included in any consultation process going forward.

I look forward to your response.
Kind regards,

Raymond Peers

Raymond Peers
Managing Director
Q-Park Ireland Limited
T: +353 1 8788957

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:50
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

I would like to state my opposition to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Impact on Balheary Park

The current proposal will mean that approximately15 metres of the existing park will be removed along the boundary of the Balheary Road up to the Estuary Roundabout to facilitate the widening of the road for the Swiftway Buses. This will result in the green space behind the GAA pitch currently used by Fingallians GAA Club being significantly reduced in length, this will result in footballs and sliotars going onto the new roadway, as the new boundary with the road will be too close to the existing pitch. Also the area that is used by local runners to do their training will be removed. As Balheary Park is used by a number of clubs for both training and matches, the existing parking challenge in this area will be further compounded by the Swiftway proposal.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 11:41
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan is on the outer edge of Swords and we have been attempting for years without success to get Dublin Bus, Swords Express and Bus Eireann (school bus) to include Knocksedan on their routes. If BRT / Swiftway gets the go ahead, Knocksedan must feature prominently on a feeder bus route to one of the main Swords Swiftway stops.

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:55
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Knocksedan so on the outer edge of swords and we have been attempting for years without success to get dublin bus, swords express, bus Eilean (school bus) to include knocksedan on their routes. If BT Swift way gets the go ahead knocksedan must feature prominently on a feeder bus route to one of the main school words swift way stops

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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 14:51
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: 141126_BRT_Submission_to_NTA_Swords_City_Centre.pdf

From: Ken Swaby
Organisation: ILTP Consulting
Address: St. Albert's House, Dunboyne, Co. Meath.

Comments:
Dear Sir / Madam,

The Comer Group have requested ILTP Consulting to conduct a preliminary analysis of the BRT proposals and the impact the proposals may have on their landholding in Dardistown, Co. Dublin.

The analysis identified some issues of concern and the attached submission provides details on these concerns.

Can you please confirm receipt of submission and if you have any concerns please contact me.

Regards,

Ken Swaby

--
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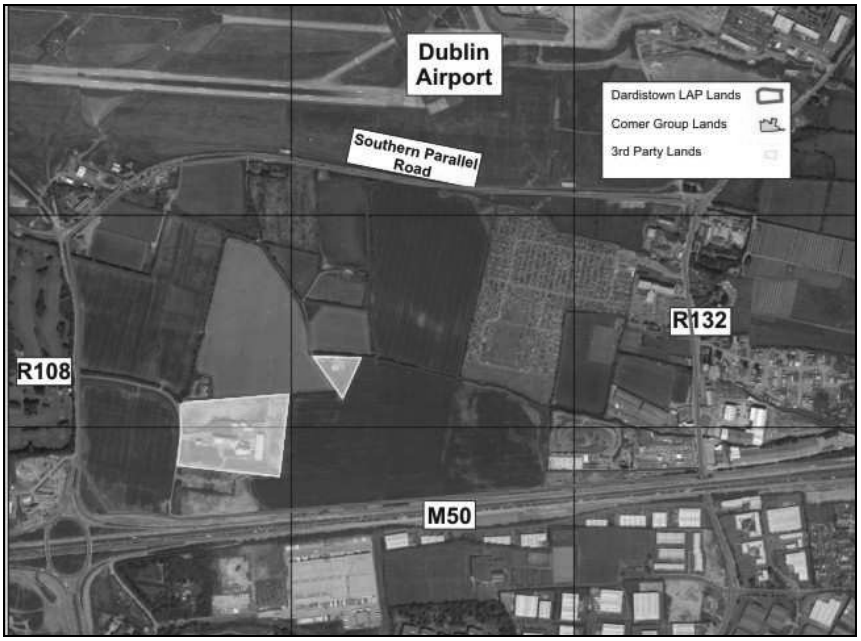
0479b

COMER PROPERTY MANAGEMENT

ILTP consulting

Submission to NTA Bus Rapid Transit – Preferred Route Swords / Dublin Airport to City Centre Corridor

Client: Sainfoin Property Company (part of the Comer Group) - Metropark



November 2014

ILTP
consulting

SUBMISSION TO NTA BUS RAPID TRANSIT – PREFERRED ROUTE SWORDS / AIRPORT TO CITY CENTRE CORRIDOR

Description:

NTA Submission

Author:

Ken Swaby

Michael Higgins

Approved By:

Christy O'Sullivan

26 November 2014

Distribution:

National Transport Authority
Sainfoin Property Company

ILTP
Head Office:
St. Albert's House
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SUBMISSION TO NTA SWORDS / AIRPORT TO CITY CENTRE PREFRERRED ROUTE BUS RAPID TRANSIT ON BEHALF OF SAINFOIN PROPERTY COMPANY

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1 INTRODUCTION

1.1 Purpose of Report

1.1.1 The NTA launched a public consultation on proposals for the BRT Preferred Route for the Swords / Airport to City Centre Corridor in October 2014.

1.1.2 Sainfoin Property Company (part of the Comer Group) have very recently completed the purchase of a large zoned landholding within Dardistown LAP adjacent to the preferred route of the BRT Swords / Airport to City Centre, known as Metropark.

1.1.3 ILTP Consulting acted as transport and land use consultants to the previous owners of the land and are very familiar with the lands and all issues pertaining to accessing and servicing these lands.

1.1.4 The Comer Group have requested ILTP Consulting to conduct a preliminary analysis of the BRT proposals.

1.1.5 This analysis identified significant issues of concern regarding the BRT Preferred Route and its impact on the zoned lands in Dardistown.

1.1.6 This submission to the National Transport Authority (NTA), BRT Preferred Route for the Swords / Airport to City Centre Corridor outlines the findings of this assessment specifically and outlines proposed amendments on behalf of our client.

1.2 Format of Submission

1.2.1 Chapter 2 provides an overview of the existing land holding, access arrangements and planning policy.

1.2.2 The BRT proposals in the vicinity of the lands and their impact on the lands are described in Chapter 3.

1.2.3 In Chapter 4 the appropriate modifications are proposed and clarifications are requested on a number of issues regarding the ownership and management of the BRT network.

1.2.4 The Summary and Conclusions are set down in Chapter 5.

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2 EXISTING LANDHOLDING STATUS

2.1 Introduction

2.1.1 The Comer Group have very recently completed the purchase of approximately 85ha of zoned lands in Dardistown, Co. Dublin. The extent of these lands is shown in Figure 2.1.

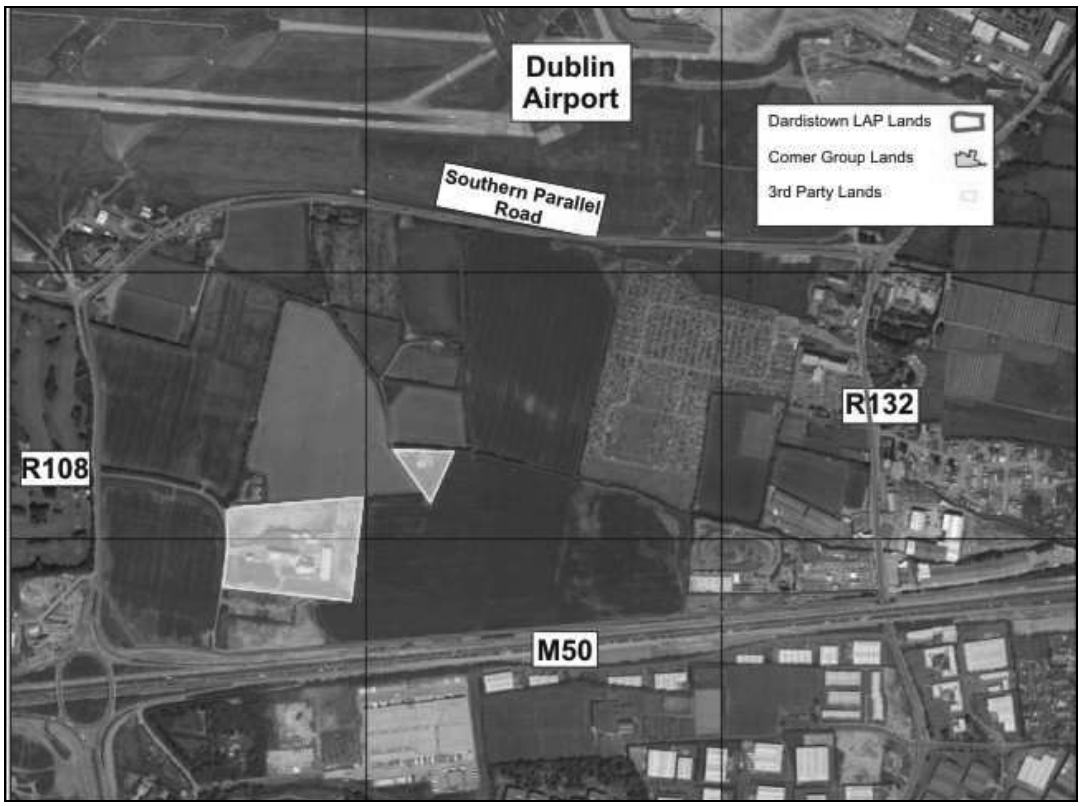

Figure 2.1: Extent of Comer Group Lands

2.1.2 These lands are strategically located between Dublin City Centre and Dublin Airport and within the Dardistown LAP and are zoned for development.

2.2 Existing Access Arrangements

2.2.1 The lands are currently accessed from the R108, the Southern Parallel Road and the R132. The proposed BRT will impact only on the single access to the lands off the R132.

2.2.2 It can be seen in Figure 2.2 that the R132 has a broken line in the middle of the carriageway and the existing access allows for an all movement entrance and egress to the lands.

2.2.3 The access road off the R132 also provides access to our Client's lands and a number of existing businesses located within the lands and to other lands to the north of the access road.

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Figure 2.2: Existing Access off R132

2.2.4 The existing R132 roadway at the junction has north and south bound bus lanes, a lane for general traffic northbound and southbound, advisory on road cycle lanes north and southbound and a footpath on each side of the roadway.

2.3 Planning Policy – Zoning

2.3.1 The subject lands are zoned in the Fingal County Development Plan. As shown in Figure 2.3 the lands are zoned GE – *Provide opportunities for General Enterprise and Employment* and HT- *Provide for office, research and development and high technology / high technology manufacturing type employment in a high quality built and landscaped environment*.

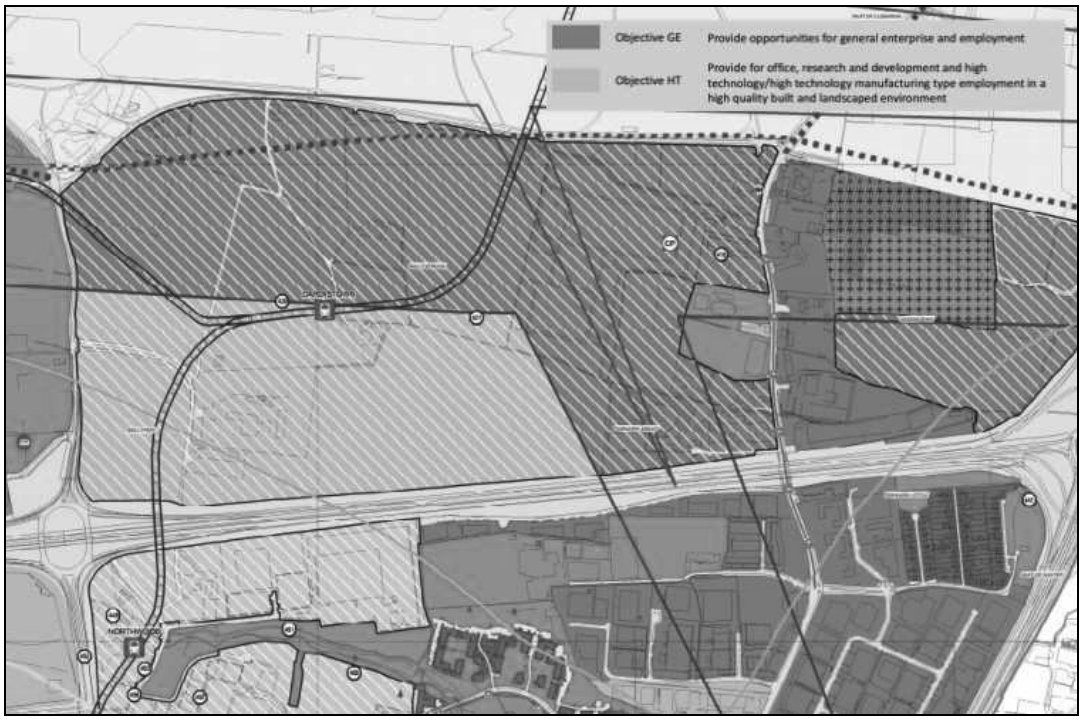

Figure 2.3: Zoning of Comer Group Lands (Source: FCC)

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2.3.2 The *Fingal County Development Plan* also required that a Local Area Plan be prepared. This LAP, the *Dardistown LAP 2013,* has been prepared and adopted by Fingal County Council.

2.3.3 The LAP provides for the development of the lands and the strategic vision for the lands as stated in the LAP is:

> *"To develop a sustainable, legible, high quality employment district supporting a broad mix of strategic employment and complementary uses integrated with high quality internal and external movement networks, centred on a higher-density node supported by existing and planned investment in transportation and services infrastructure including future public transportation provision (QBCs and Metro) and road network improvements, while enhancing and protecting surface access to the Airport."*

2.4 Planning Policy – Transport

2.4.1 The LAP provides a framework for the provision of transport to and within the LAP lands. Figure 2.4 below shows the planned QBC and Metro North within the LAP. A transport hub with bus, metro and bicycle facilities is planned adjacent to Dardistown Metro Station.

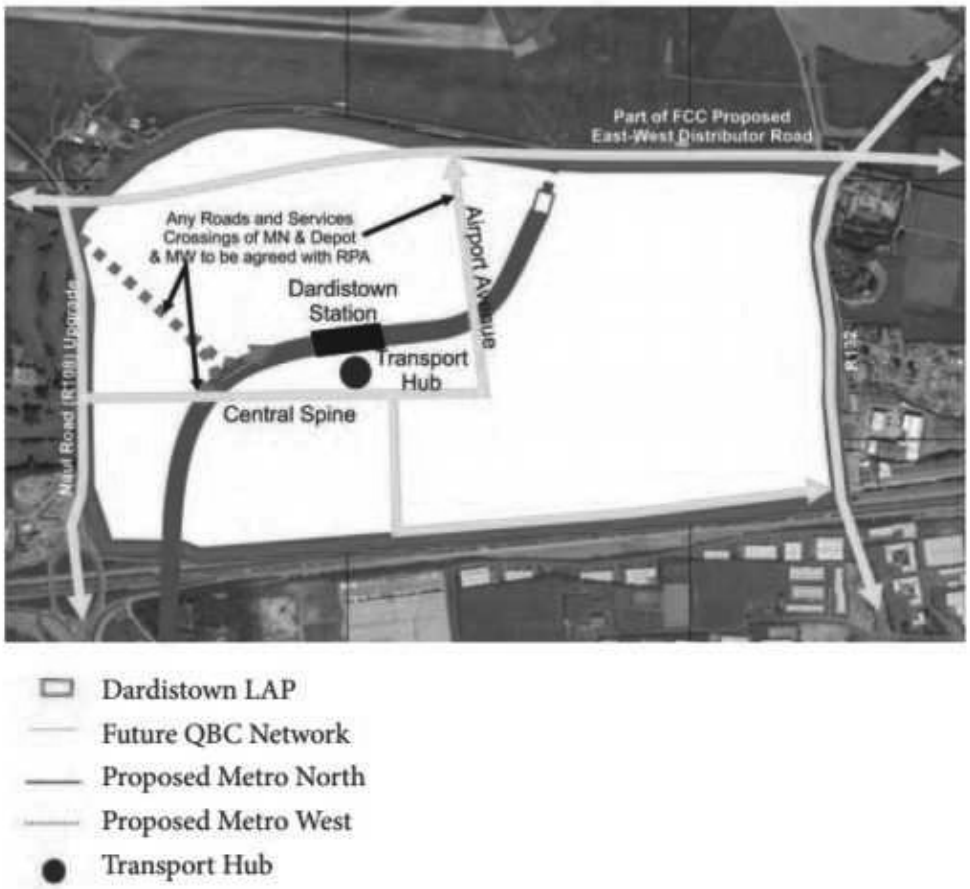

Figure 5.1: Proposed Internal & External QBC Network

Figure 2.4: Transport Network (Source Dardistown LAP)

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2.4.2 It can be seen that one of the major accesses planned to serve the LAP lands is off the R132 within the subject lands.

2.5 Planning Policy - Servicing

2.5.1 The servicing of the land is also set out in the Dardistown LAP. All phases are serviced via the R132 as shown in Figure 2.5.

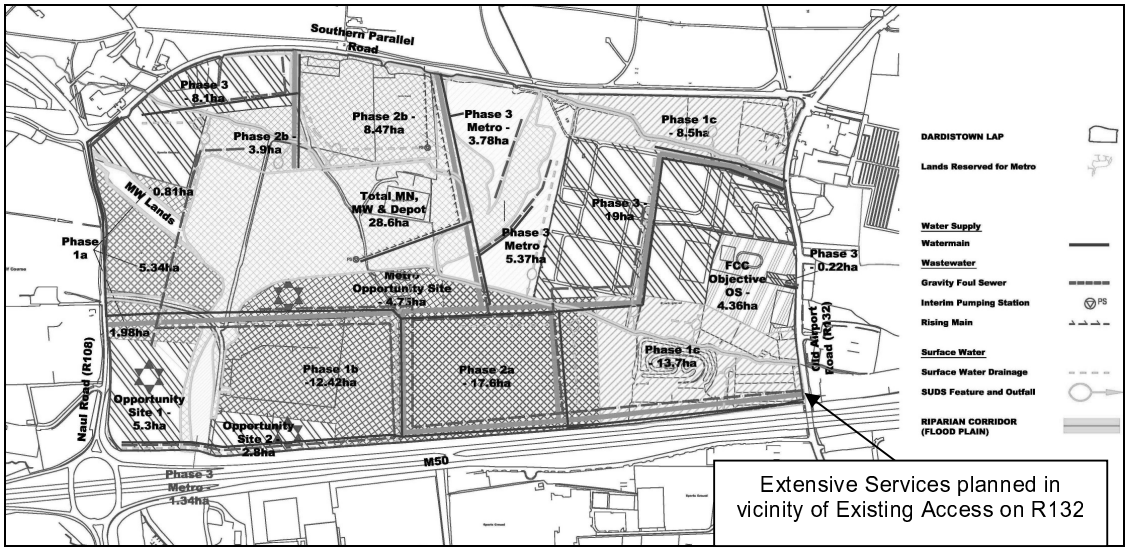

Figure 2.5: All Phasing - Servicing via the R132 (Source: Dardistown LAP)

2.5.2 Construction access from the R132 will also be required for the development of Metropark lands, including for the extensive service installation shown in Figure 2.5. It is therefore vital that the proposed BRT scheme would not impede, delay or add to the cost of servicing these lands.

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3 NTA PROPOSALS AND ANALYSIS OF PROPOSALS

3.1 Introduction

3.1.1 The preferred route for the Swords / Airport to City Centre BRT was published in October 2014. The preferred route drawings are the first public drawings to show the impacts the proposed BRT development will have on the subject lands.

3.2 Description of NTA Proposed Layout

3.2.1 The proposed layout is shown in Figure 3.1.

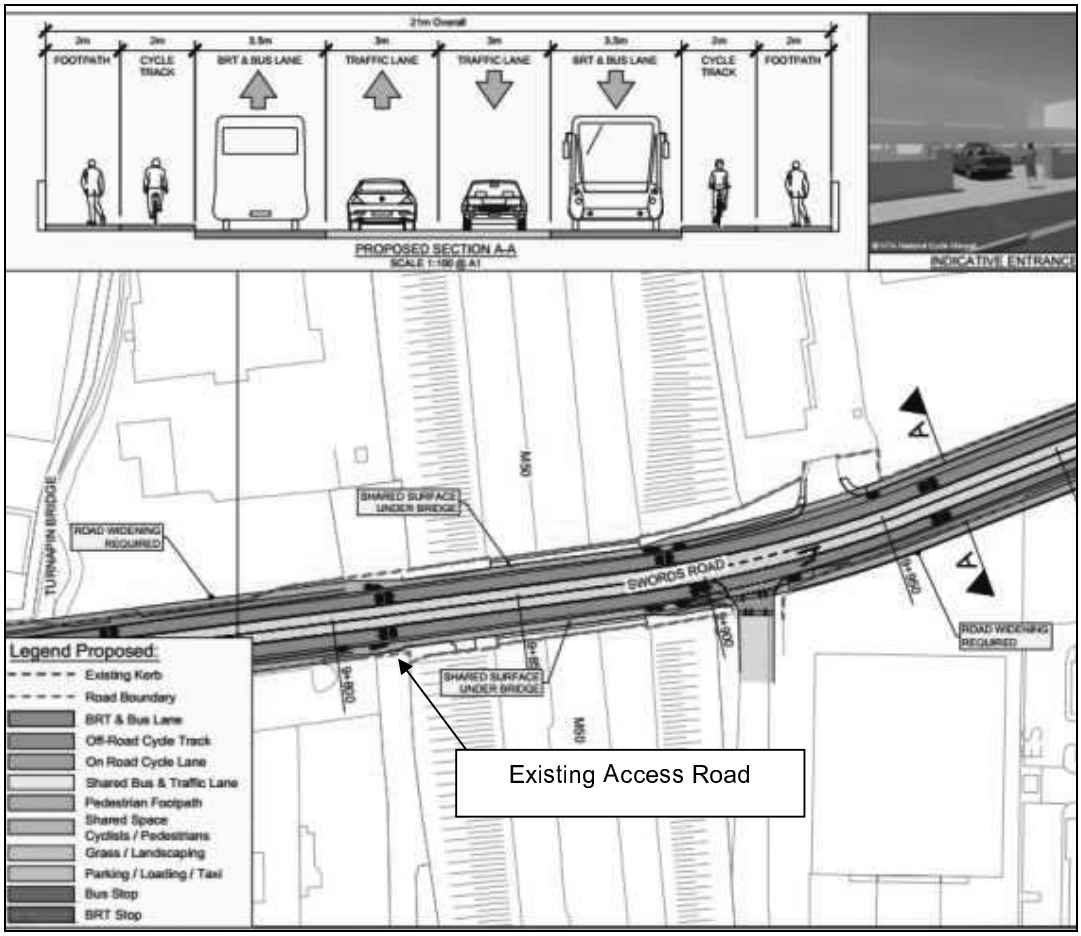

Figure 3.1: Proposed BRT and Road Layout (Source: NTA)

3.2.2 The overall carriageway remains the same width, but a number of changes to the road layout are proposed at the existing access to the subject lands and other existing businesses:

- A solid line is shown in the middle of the R132 carriageway. This restricts right turning movement into and out of the access road. It is noted from the BRT and Road Layout shown in Figure 3.1 however that no such restriction is proposed for the access road immediately to the south of the M50 overbridge.
- The north and south bus lanes are modified to BRT & Bus lane and are widened from 3m to 3.5m.

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- The separate footpaths and cycle lanes become a Shared Space Cyclists / Pedestrians.
- The continuous cycle lane in the vicinity of the access is replaced by cycle facilities which vary between on road cycle lane and off road cycle track.

3.3 Issues Arising from Proposed BRT and Proposed Modifications

3.3.1 The proposed BRT Scheme proposals could have a number of impacts which are of concern to our Client. These concerns pertain to:

- Restriction on Vehicular Access movements to and from the lands off the R132, particularly right turning manoeuvres
- Potential impact on service installation to the lands if the BRT scheme progresses
- Lack of integration with *Dardistown LAP 2013*
- Delay to the Metro North scheme that could result from the BRT Scheme progressing, could result in a planning blight on Metropark lands.

3.4 Restrictions on Vehicular access to Dardistown LAP lands off the R132

3.4.1 The NTA arrangements as currently proposed include a solid white line in the centre of the R132. This will replace the existing broken line and will change the existing all movement access to a left in, left out only arrangement.

3.4.2 Such a change will have significant negative impacts on the movements facilitated by the access and the practicality of routing future bus services through this access road as provided for in the *Dardistown LAP 2013* and shown in Figure 2.4.

3.4.3 There are a number of existing business that currently use this access and they would be adversely impact by the proposal.

3.4.4 In addition to this issue there are future uncertainties regarding access movements. Along the route of the proposed BRT it is proposed to CPO lands. On completion of the construction of the scheme it is uncertain who will own these lands and indeed the entire BRT network.

3.5 Impact on Servicing Arrangements set out in Dardistown LAP

3.5.1 The ownership of the network may impact on the provision and use of accesses onto the R132 and other roadways in the future.

3.5.2 An additional concern is the impact the ownership and management of the BRT may have on the provision of services to the subject lands in line with the *Dardistown LAP 2013* and shown in Figure 2.4. It is also unclear what the procedure will be for progressing services within the confines of the R132 with the BRT in place.

3.5.3 There is some uncertainty regarding the management and ownership of the BRT network post construction which in itself could impact negatively on the development of the lands.

3.6 Provision of Public Transport for Dardistown LAP

3.6.1 The *Dardistown LAP 2013* provides for public transport including QBC routing through the Dardistown LAP lands as shown in Figure 2.4.

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3.6.2 The restrictions proposed by the NTA on the access to the R132 immediately north of the M50 mean this QBC route cannot be provided.

3.7 Cyclists and Pedestrians

3.7.1 The dangers to cyclists posed by articulated vehicles has long been acknowledged internationally and the almost complete removal of articulated lorries from the City Centre is regarded as one of the key benefits of Dublin Port Tunnel.

3.7.2 Notwithstanding the intention to provide, as much as possible, segregated cycle facilities along the BRT corridor, the increase in articulated vehicles on the road network may increase risks for cyclists.

3.7.3 The BRT network and vehicles should be so designed as to impact positively or at a minimum have a neutral impact on cyclists and pedestrians.

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4 ILTP PROPOSED MODIFICATIONS

4.1 Introduction

4.1.1 An analysis of the proposed BRT scheme has identified a number of areas of concern which can be addressed. These concerns pertain mainly to the access arrangements, the impact on future servicing arrangements for zoned lands set out in the Dardistown LAP and the impact on existing and planned pedestrian, cyclist and public transport facilities.

4.1.2 The full extent of these impacts is not yet clear as insufficient information has been made available by the NTA and our Client would like to reserve the right to comment further if and when greater details on the scheme and other items are made available.

4.2 Access off R132

4.2.1 The existing access arrangements allowing for all movements at the R132 / Access Road junction should be maintained.

4.2.2 The BRT Scheme should provide for future public transport and vehicular access to the Dardistown LAP lands as set out in the *Dardistown LAP 2013.*

4.3 Terminus Facilities

4.3.1 The *Dardistown LAP 2013* provides for a transport hub with bus, rail and bicycle facilities to be provided. The GE landzoning also includes 'Road Transport Depot' as a use, which is permitted in principle.

4.3.2 It is noted that the Proposed BRT Scheme does not propose to provide any terminus facilities in the City Centre and the only terminus facilities proposed are at Oldtown at the northern end of the proposed BRT route. The proposed terminus facilities will not be able to serve the Airport to City centre element of the proposed scheme due to their remoteness.

4.3.3 The location originally proposed by the RPA for the Metro North Deport was north of Swords, which rejected by An Bord Pleanala as it was located at the end of the route. The permitted Metro North depot was subsequently relocated to Dardistown after the location was identified by the Board as being suitable for a depot and park and ride facility.

4.3.4 If the Board was of a similar view in respect to the proposed BRT, then alternative terminus facilities would need to be identified mid way along the route. Our client would be willing to consider layover / terminus facility that would be located within the subject lands, even on a temporary basis. The provision of a mid-way layover facility would allow scheduled headways between Swiftway vehicles to be better maintained and accord with the previous Board's thinking in respect to metro North.

4.4 Servicing of the Dardistown LAP lands

4.4.1 Plans for the servicing of the Dardistown LAP lands have been set out in the *Dardistown LAP 2013.* The BRT scheme must be consistent with this statutory planning policy document and support its implementation.

4.4.2 Sufficient access under the BRT network required to service the lands in line with the LAP must be provided. In addition, the means by which this will be delivered must be set down prior to any further development of the BRT.

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4.5 Post Construction Management of BRT Carriageway and Access to Services

4.5.1 Arrangements for the post construction management of the BRT line have not been set out. Issues which have not been clarified include:

- The use of BRT by private buses, taxis, etc.
- Future access on/off roadways on which the BRT is routed
- Future provision and maintenance of Services located under the BRT network
- Future ownership of the BTP network need to be clarified.

4.6 Cyclists and Pedestrians

4.6.1 The BRT network and vehicles should be designed so as to impact positively or at a minimum have a neutral impact on cyclists and pedestrians.

4.7 Transport Study Greater Swords Area

4.7.1 ILTP Consulting have been informed by Fingal County Council and the NTA that a transport study of the Greater Swords Area is currently underway. This study could materially affect our Client's view on the proposed BRT Scheme. At a minimum it would improve greatly our understanding of existing and future travel demands and patterns and possible alternative scheme. Progressing of the BRT further prior to the finalisation and publication of the Transport Study for the Greater Swords Area is premature.

4.8 Potential Delay to Metro North Approved Scheme

4.8.1 Any delay to the Metro North Scheme arising from the BRT Scheme progressing could have an adverse impact on our client lands, which are currently reserved for the Metro North Scheme. There is currently no funding confirmed for the propose BRT Scheme. The danger is that the proposed BRT Scheme could get approval and not be implemented for a number of years, potentially causing further delay to Metro North and adding to planning blight on our client lands.. Therefore the proposed BRT Scheme should not be progressed further until specific funding is made available for the scheme and a defined timeline for its implementation is known.

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5 SUMMARY & CONCLUSIONS

5.1 Summary

5.1.1 The NTA launched a public consultation on proposals for the BRT Preferred Route for the Swords / Airport to City Centre Corridor in October 2014.

5.1.2 The preferred route drawings are the first public drawings to show the impacts the proposed BRT development will have on individual landowners.

5.1.3 The Comer Group have very recently purchased approximately 85ha of land adjacent to the proposed BRT network in Dardistown, Co. Dublin.

5.1.4 The lands are all zoned for General Employment and Enterprise and High Technology and are located within *Dardistown Local Area Plan.*

5.1.5 Having reviewed the BRT proposals a number of specific issues of concern have been identified:

- Restriction on Vehicular Access to and from the lands off the R132
- The potential impact of the BRT on the Servicing of the Dardistown LAP lands
- Lack of funding commitment for the proposed BRT Scheme
- Future ownership of the BRT Route Network and management of same.
- Potential delays to the Metro North Scheme

5.1.6 Cumulatively these impacts may cause planning blight and/or significantly delay the development of Dardistown LAP.

5.1.7 In order to address these concerns a number of modifications have been proposed.

5.1.8 Proposed Modifications Requested

5.1.9 The existing access arrangements allowing for all movements at the R132 / Access Road junction should be maintained.

5.1.10 Ready access under the BRT network required to service the lands in line with the LAP must be provided for. In addition, the means by which this will be delivered must be set down prior to any further development of the BRT.

5.1.11 Provision for future access to the Dardistown LAP should be included in the scheme.

5.1.12 It is proposed that a layover / terminus facility located within the land, even on a temporary basis be considered. The provision of a layover facility would allow scheduled headways between Swiftway vehicles to be maintained.

5.2 Conclusion

5.2.1 The current BRT proposals have the potential to significantly delay the development of zoned lands within the *Dardistown LAP 2013,* due to funding uncertainty and the potential delay to the approved Metro North Scheme.

5.2.2 The NTA proposed access arrangements off the R132 do not have sufficient regard for the *Dardistown LAP 2013.* In addition the proposed BRT may hinder the servicing of the lands as per the *Dardistown LAP 2013.*

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5.2.3 Our client would be happy to work with the NTA and FCC to address out client's concerns as they are proposing to bring the lands forward for development in the near future. They would also be happy to consider the inclusion of BRT layover facilities on their lands as they could be an optimal location for the provision of such facilities.

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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:12
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: 141128Frank_Grant_Garages_Submission_proposed_BRT_NTA_Swords_City_Centre.pdf

From: Ken Swaby
Organisation: ILTP Consulting
Address: St. Albert's House, Dunboyne, Co. Meath

Comments:
Dear Sir / Madam,

ILTP Consulting were asked by Frank Grant Garages Ltd to prepare a submission on the proposed BRT Swords / Airport to City Centre scheme.

Can you please confirm receipt of submission and should you have any queries please contact me.

Regards,

Ken Swaby
ken@iltp.ie

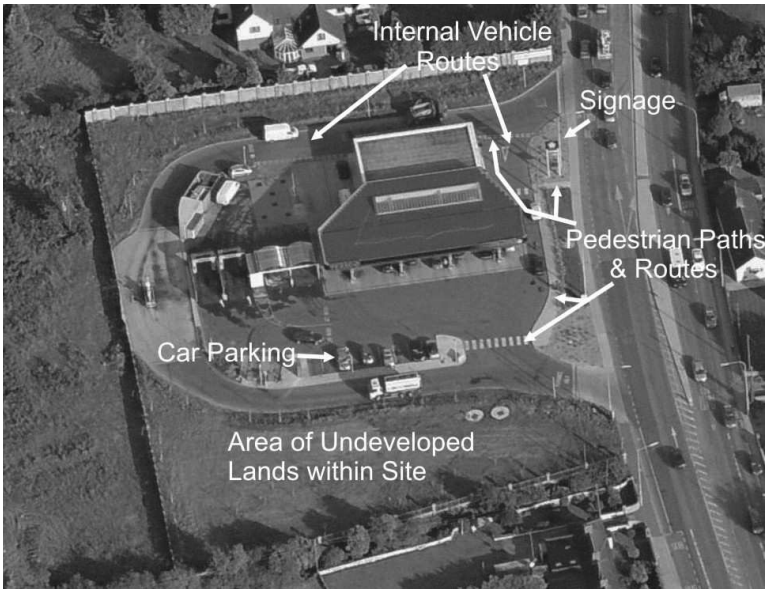
--
This e-mail was sent from a contact form on National Transport Authority (http://www.nationaltransport.ie)

If you'd like to unsubscribe and stop receiving these emails click here.

0480b

Submission to NTA Bus Rapid Transit – Preferred Route Swords / Dublin Airport to City Centre Corridor

Client: Frank Grant Garages Ltd.



Frank Grant Garages Ltd. Submission

November 2014

ILTP
consulting

SUBMISSION TO NTA BUS RAPID TRANSIT – PREFERRED ROUTE SWORDS / AIRPORT TO CITY CENTRE CORRIDOR

Description:

NTA Submission

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Approved By:

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28 November 2014

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SUBMISSION TO NTA SWORDS / AIRPORT TO CITY CENTRE PREFRERRED ROUTE BUS RAPID TRANSIT ON BEHALF OF FRANK GRANT GARAGES LTD.

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1 INTRODUCTION

1.1 Purpose of Report

1.1.1 The NTA launched a public consultation on proposals for the BRT Preferred Route for the Swords / Airport to City Centre Corridor in October 2014.

1.1.2 Frank Grant Garages Ltd run a service station and retail outlet on the R132 adjacent to the proposed BRT route.

1.1.3 ILTP Consulting were requested by Frank Grant Garages Ltd. to examine the impact the proposed BRT Preferred Route for the Swords / Airport to City Centre Corridor would have on his business from a traffic and transport perspective.

1.1.4 This analysis identified significant negative impacts the BRT Preferred Route would have on the service station and retail outlet. This submission to the National Transport Authority (NTA) on the BRT Preferred Route for the Swords / Airport to City Centre Corridor outlines the findings of this assessment specifically and outlines proposed amendments on behalf of our client.

1.2 Format of Submission

1.2.1 Chapter 2 provides an overview of operations at Frank Grant Garages Ltd and the existing traffic and transport arrangements.

1.2.2 The BRT proposals in the vicinity of the Hotel are described in Chapter 3.

1.2.3 In Chapter 4 the impact of the BRT proposals is outlined and in some cases modifications are proposed or clarifications sought.

1.2.4 A summary and conclusion is provided in Chapter 5.

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2 EXISTING TRAFFIC AND TRANSPORT PROVISIONS

2.1 Introduction

2.1.1 Frank Grant Garages Ltd runs a service station and retail outlet on the R132 at Airside in Dublin. The facility, on a site of approximately 0.84ha includes:

- 4 no. pumps
- Car wash facilities,
- Convenience Shop (Spar)
- Hot food deli

2.2 Existing Internal Movement Arrangements and Layout

2.2.1 The existing arrangements within the service station are shown in Figure 2.1.

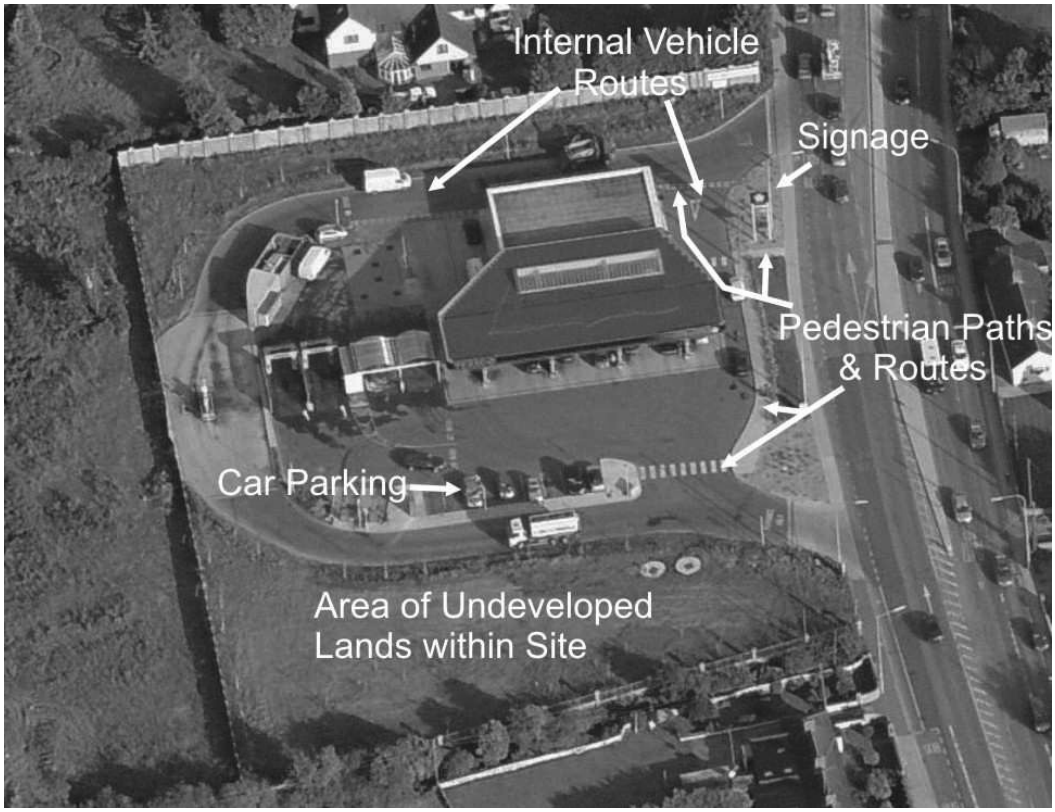

Figure 2.1: Existing Service Station and Road Layout

2.2.2 It can be seen that there are 9 formal car parking spaces and substantial areas for additional car parking.

2.2.3 Pedestrian movement is provided for with defined pedestrian routes and footpaths.

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2.2.4 Signage including statutorily required signage regarding price is provided within the landscaped area adjacent to the road.

2.2.5 Internal vehicular movement is provided for via a vehicular route between the landscaped area and the forecourt and a route to the rear of the forecourt.

2.2.6 There is an area of undeveloped land within the site to the south of the existing service station.

2.2.7 The service station and associated facilities are currently well used and a number of people are employed in the service station.

2.2.8 Our Client has informed us that there is also an existing right of way through the service station which provides access from the R132 to the lands located west of the service station.

2.3 Existing Road Access Arrangements

2.3.1 The existing road alignment and access arrangements are shown in Figure 2.2.

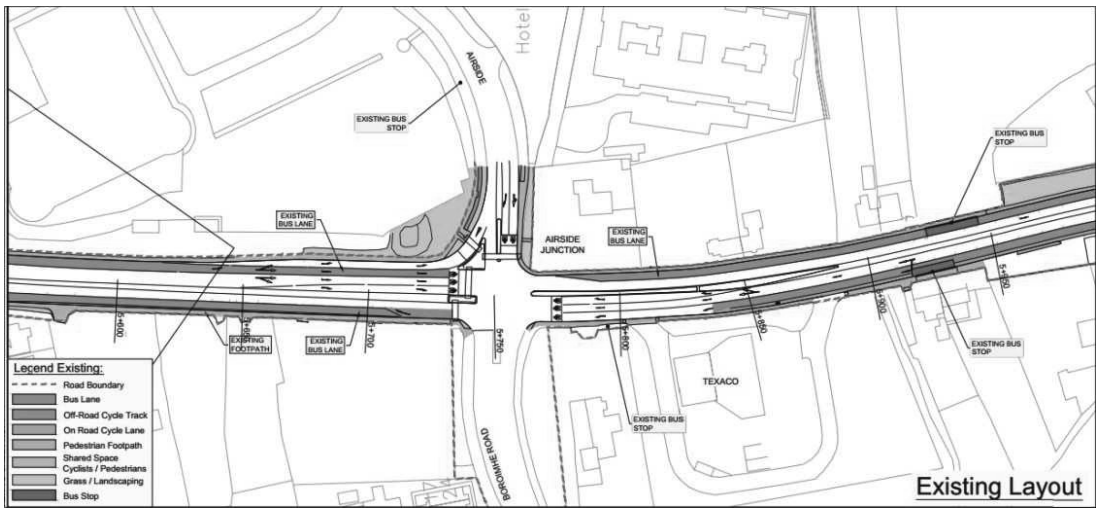

Figure 2.2: Existing Road Layout (Source: NTA)

2.3.2 As shown in Figure 2.1 there is a left in left out access arrangement to the service station from the R132. There is a raised central island preventing right turning movements.

2.3.3 The northbound carriageway adjacent to the service station is two lanes, one of which is a bus lane. At the northern end of the service station the northbound carriageway widens and lanes are provided for left, straight on and right turning movements at the R132 / Boroimhe Road junction. There is also an on road advisory cycle lane and a footpath.

2.3.4 The southbound carriageway also has two lanes in addition to a footpath. One of the lanes is a bus lane. The total width of the existing carriageway is approximately 19.75m. There is no specific provision for cyclists southbound.

2.3.5 There are bus stops north and south bound on the R132 approximately 55m south of the Service Station.

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2.3.6 The R132 / Boroimhe Road junction junction is approximately 40m north of the service station exit. There are very large areas of residential development and a considerable population located west of this junction. Consequently there is a significant level of left turners at this junction.

2.3.7 The existing egress arrangements from the service station operate well. Exiting vehicles can move to the edge of the carriageway. Here there are good sightlines and visibility and vehicles can exit without undue internal queuing.

2.3.8 Cars on the R132 sometimes slow down to allow cars exit the service station and there is a de facto priority existing for cars exiting and cars can generally move across the lanes to make a right turn at the Airside Junction if required without undue difficulty in the existing arrangement.

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3 NTA PROPOSALS – SWORDS TO CITY CENTRE PREFERRED ROUTE

3.1 Introduction

3.1.1 The preferred route for the Swords / Airport to City Centre BRT was published in October 2014. The preferred route drawings are the first public drawings to show the impacts the proposed BRT development will have on the subject service station.

3.2 Description of NTA Proposed Layout

3.2.1 The proposed layout is shown in Figure 3.1.

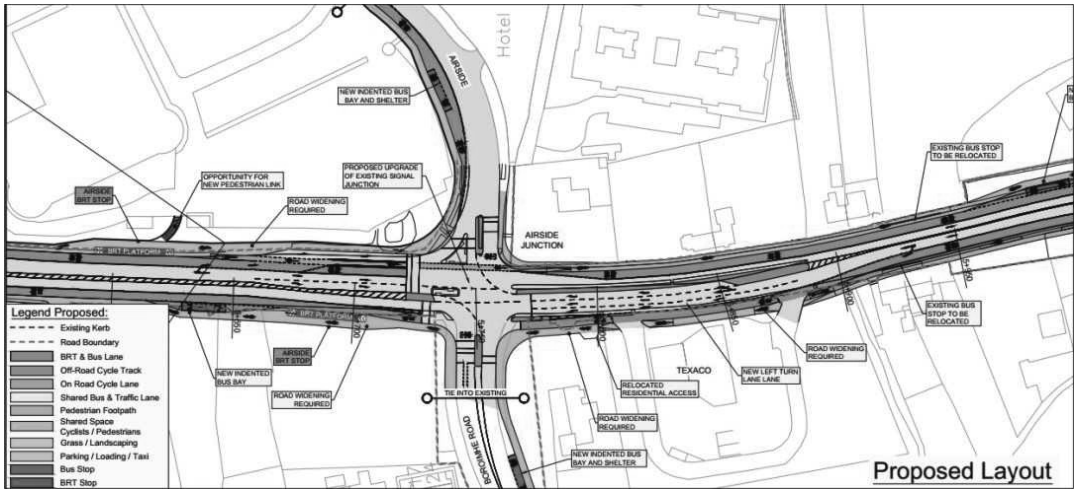

Figure 3.1: Proposed BRT and Road Layout (Source: NTA)

3.2.2 The proposed arrangements require the widening of the R132 roadway adjacent to the service station. This widening takes place entirely on the service station side of the carriageway. The proposed carriageway will be approximately 25m.

3.2.3 The proposed road layout at the service station includes:

- CPO of strip of land along extent of service station approximately 4 – 6m in width
- Shared cyclist / pedestrian space Northbound
- BRT lane Northbound
- Three vehicular lanes Northbound (Right turning, left turning and straight ahead)
- Shared space for cyclists and pedestrians Southbound
- 1 no. traffic lane southbound
- BRT lane southbound

3.2.4 The traffic signal sequencing and phasing at the R132 / Boroimhe Road is not detailed. However the addition of the BRT will require significant modifications and reduce vehicular capacity through the junction.

3.2.5 It is proposed to relocate the bus stops located south of the service station further to the south of the Service Station.

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3.2.6 The closest BRT stop proposed is the Airside BRT which is proposed to be located north of the R132 / Boroimhe Road junction approximately 150m north of the service station.

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4 ISSUES ARISING FROM PROPOSED BRT AND PROPOSED MODIFICATIONS

4.1 Introduction

4.1.1 An analysis of the proposed BRT scheme has identified a number of areas of concern for the service station. These concerns pertain to the particular arrangements proposed in the vicinity of the service station and also wider concerns regarding the overall management and functioning of the BRT. These concerns are set out below.

4.2 Loss of Area at front of Service Station

4.2.1 A strip of land at the front of the service station is proposed to be subject to a permanent CPO. It is estimated that this will be approximately 4 – 6 metres in width across the entire service station.

4.2.2 In addition a further strip may be the subject of a CPO to allow for the construction of the BRT.

4.2.3 The CPO will have a negative impact on the service station. As a result of the CPO it may not be possible to maintain the existing vehicular and pedestrian routes within the service station between the forecourt building and the public road.

4.2.4 The existing provisions for vehicular and pedestrian movement within the service station is as per the conditions attached to the decision to grant permission for the service station (Ref. F05A/0123).

4.2.5 The elimination of either the footpath or vehicular route will, at a minimum, impact negatively on the convenience and safety of the service station.

4.2.6 Indeed if the internal roadway cannot be provided the service station may not be able to continue in operation.

4.2.7 Existing signage detailing the price of petrol and diesel, which is a legal requirement, is located in the area which is to be subject to a CPO. It is not clear where new signage may be provided that is easily visible for road users.

4.2.8 In addition, a high quality landscaped area at the front of the service station will be permanently removed and there will be a consequent negative impact on the visual amenity.

4.2.9 The provision of “a satisfactory scheme of landscaping” was a condition attached to the grant of permission by the planning authority (Ref. F05A/0123).

4.2.10 The area that is subject to CPO was identified within the approved Metro North (Ref. 06F.NA.0003) plans as being used for a stormwater separator and a pump sump as shown in Figure 4.1. The CPO of these lands will therefore negatively impact on the planned future provision of Metro North.

4.2.11 As the full extent of the CPO is not yet known the full extent of the impact on the service station are not yet known.

4.3 Exit Arrangements

4.3.1 The proposed R132 carriageway at the exit is significantly different from that which currently exists. The proposed roadway will consist of four traffic lanes; left and right turning and straight ahead and also a BRT.

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4.3.2 The addition of an extra lane to cross will in itself make exiting more difficult. The extra lane being a BRT will further increase these difficulties.

4.3.3 The size of the BRT buses may significantly impact on the sightlines and visibility of drivers exiting the service station. This will compound the impact of a reduction in sightlines caused by the removal of the landscaped area.

4.3.4 In addition the *Route Options Assessment Volume 1: Main Report* states "*BRT lanes will require stringent traffic management enforcement".* Stringent enforcement will compound the difficulties experienced by drivers exiting the service station as drivers will not be able to nudge forward onto the network.

4.3.5 Prioritisation of BRT movement through the junction may mean BRT buses will pass by the petrol station and through the junction at speed making movement of a vehicle exiting the service station onto the BRT lane potentially unsafe.

4.4 Right of Way

4.4.1 The proposed BRT may also impact negatively on the right of way access through the existing service station and providing access from the R132 to the lands located west of the service station.

4.5 Impact of Modification of Boroimhe Road / R132 Junction

4.5.1 The Boroimhe Road / R132 junction is located approximately 40m north of the service station. This junction is proposed to be altered as part of the BRT scheme and may have a significant impact on the service station due to its close proximity.

4.5.2 The revised junction including the BRT lanes may have a reduced capacity. The omission of any details of signal sequencing and phasing mean it is impossible to estimate accurately the full extent of the impact of the proposed changes.

4.5.3 There are very large areas of residential development and a considerable population located west of this junction. Consequently there is a significant level of left turners at this junction. It is clear that a reduction in vehicle capacity at the junction will impact negatively on traffic movement.

4.5.4 Left turning traffic northbound on the R132 including existing Dublin Bus services will, in the proposed junction layout, be in conflict with the straight through movement of the BRT buses.

4.5.5 A queue of turning vehicles or Dublin Bus services at the Boroimhe Road / R132 junction will block all vehicles exiting the service station as currently proposed.

4.6 BRT and Impact on Metro North

4.6.1 Metro North is an approved metro scheme connecting Swords with the City Centre and serving Dublin Airport (Ref. PL6F.NA0003). The BRT may impact on the physical construction and economic viability of Metro North.

4.6.2 The BRT is not viewed by the NTA as a replacement for the planned Metro North. The NTA state in the FAQ section of the BRT information publications:

> *"The Swords/Airport to City Centre Swiftway is not intended as a substitute for Metro North. The proposed Swiftway service is the appropriate transport solution to serve the existing public transport deficit along this corridor in the short to medium term. If development occurs along this corridor as currently*

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planned, there will be a requirement to deliver a rail based solution such as Metro North to fully serve the broad Swords to City Centre corridor in the longer term."

4.6.3 Metro North was approved by the Board in October 2010 (Ref. 06F.NA.0003). The Railway Order provides for the works to be substantially completed by the end of the period of 10 years beginning on the date on which the order came into operation.

4.6.4 The project has been deferred, as set out in the *Infrastructure and Capital Investment 2012-16 Medium Term Exchequer Framework,* but the deferment will be subject to review in 2015.

4.6.5 At some points the BRT and Metro North lines have the same at grade horizontal alignment. Therefore if the BRT is first constructed the approved Metro North cannot be provided at a later stage without the subsequent removal of the BRT.

4.6.6 These issues arise in the immediate vicinity of the service station. As has been noted the area of the service station that is subject to CPO is identified within the approved Metro North plans as being used for a stormwater separator and a pump sump. As such these lands are already subject to a CPO approved for Metro North. The use of the subject site for Metro North infrastructure can be seen in the RPA drawings of the approved Metro North scheme shown in Figure 4.1.

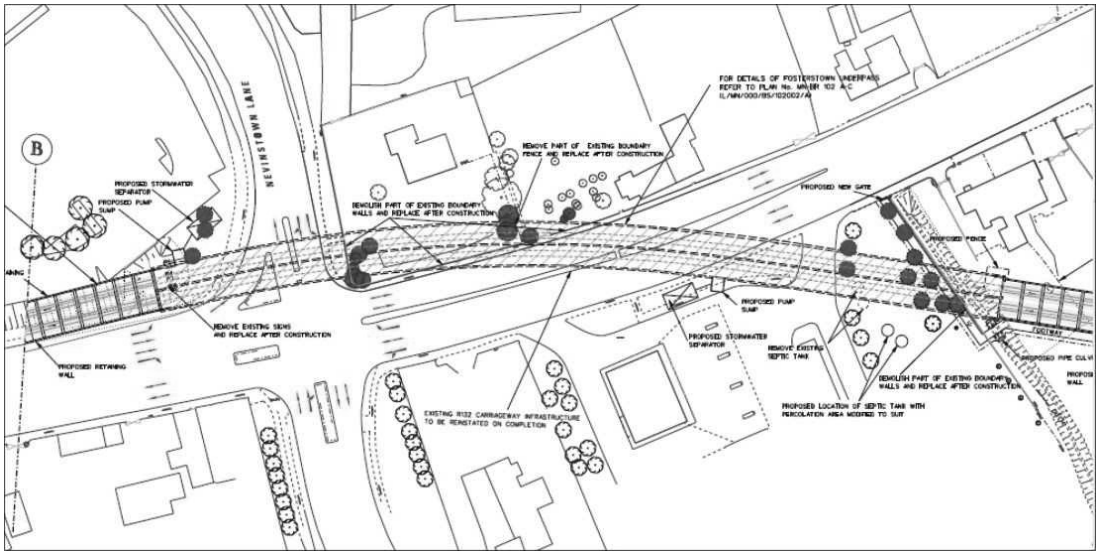

Figure 4.1: Approved Metro North Alignment Drawings (Source: RPA)

4.6.7 In addition it can be seen in Figure 4.1 that a retaining wall is required to facilitate tunnelling adjacent to the R132 to the north of Nevinstown Lane.

4.6.8 There is limited information on the proposed BRT available, however the construction of both the approved Metro North and the BRT as proposed does not appear to be possible.

4.6.9 If the BRT is re-aligned westward to accommodate the approved Metro North this will require an additional area of the service station to be compulsorily purchased.

4.6.10 The CPO of an additional area of the service station would almost certainly mean the service station could not continue to operate as the required internal circulation routes could not be provided.

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4.6.11 The construction of the approved Metro North will require the removal or modification of the BRT in the short to medium term.

4.6.12 Alternatively both a modified BRT and the approved Metro North could be provided. However no assessment of the impact of the BRT on Metro North appears to have been undertaken. The impact of a BRT which has a stated capacity of 3,600 - 4,500 ppdph on the viability of the Metro can be expected to be quite dramatic. It is not clear that there will be sufficient passenger demand for a BRT and Metro on essentially the same route to justify the level of investment required.

4.6.13 Indeed, Metro North was to be delivered by means of public private partnership, but the likelihood of the Metro North project attracting private funding may be severely compromised by the provision of the BRT.

4.6.14 The analysis of the BRT, insofar as it has been analysed, appears to have been undertaken without due regard for the approved Metro North. As such the assessment process is significantly deficient and has failed to assess the impacts the proposed BRT may have on the approved Metro North scheme either in terms of the ability to physically build the Metro, passenger demand and the impact on funding for the Metro.

4.7 Planning Blight

4.7.1 The NTA is projecting an An Bord Pleanala decision on the BRT in Q3, 2015. Following this, provided there is funding approval, infrastructure and fleet procurement can proceed. After that a construction period of approximately 2.5 years is projected for the BRT.

4.7.2 The NTA estimate that subject to funding approval, construction could begin in Q4 2015. This would mean construction will continue from Q4 2015 to Q2 2018.

4.7.3 Metro North was granted permission in 2010, construction has not yet commenced and will not commence until 2016 at the earliest.

4.7.4 The BXD Cross City Luas line after years of planning was approved in 2012 and is not projected to commence services until 2017.

4.7.5 Given the delays which have characterised other large scale transport and infrastructure projects in the planning, funding and construction phases this is an extremely optimistic timeline.

4.7.6 The uncertainty regarding the speed with which the BRT or Metro North will progress and the impossibility of both schemes progressing as currently conceived means developers will have to operate in a context of great uncertainty.

4.7.7 Such uncertainty will make the sourcing of funding for any proposed development, which is already immensely challenging even more difficult.

4.7.8 Even if development was now proposed along the Sword – City Centre corridor there is a significant risk of permission being refused due to concerns regarding the impact the proposed development might have on the permitted Metro North scheme or the proposed BRT scheme.

4.8 Impact on Future Development Options

4.8.1 The subject site includes the service station and also an area of land to the south of the service station which is not currently developed. These lands are zoned RS *"Provide for residential development and protect and improve residential amenity".*

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4.8.2 The development of the BRT may impose additional difficulties in developing these lands.

4.9 Cyclists

4.9.1 Northbound south of the service station an off-road cycle track is proposed. Outside the service station this changes to a shared space. Changes in grade and alignment such as this are always unwelcome to cyclists.

4.9.2 It should be noted that there is currently very few cyclists using this route and it may not justify a dedicated cycle facility.

4.9.3 All vehicles entering the service station are left in. This turning movement across a bicycle route places cyclists in a very vulnerable position. In this instance the vulnerability of the cyclist will be increased by the BRT lane. 18m – 26m buses will pass the cyclist and make visibility very difficult for motorists of cyclists on the off-road cycle path.

4.10 Construction and Construction Traffic Impacts

4.10.1 There is very little detail available at this point regarding the construction and construction traffic impacts of the proposed BRT. The construction of the Luas is indicative of the level of traffic and disruption that may be caused.

4.10.2 The NTA have estimated a construction period of 2.5years for the BRT. It can be expected that road and lane closures and significant levels of construction traffic will be experienced on an ongoing basis on many parts of the road network for a period of months, if not years.

4.10.3 Roadworks adjacent to a service station are particularly negative. By definition a service station provides fuel for motor vehicles and any works which hinder accessing of the station by vehicles will impact negatively on the business.

4.10.4 In addition road works, particularly the large scale ongoing works that will be required to deliver the BRT, will change motorists' behaviour. Drivers will use other routes rather than the R132 and the level of pass by trade in the service station will be reduced.

4.11 Post Construction Ownership of BRT Carriageway

4.11.1 Along the route of the proposed BRT it is proposed to CPO land. On completion of the construction of the scheme it is uncertain who will own these lands and BRT network. The ownership of the BRT line will impact on the maintenance and management of the carriageway and traffic signals.

4.11.2 In addition the ownership of the network may impact on the provision and use of accesses onto the R132 and other roadways. The effect of the BRT may be to blight lands along the length of the network.

4.12 Post Construction Management of BRT Carriageway and Services

4.12.1 Arrangements for the post construction management of the BRT line have not been set out. Issues which have not been clarified include:

- The use of BRT by private buses
- The use of BRT by taxis
- The management of traffic signals including SCATS
- Future Access on/off roadways on which the BRT is routed

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- Future ownership of the BRT Network

4.12.2 In the absence of detail on any of these arrangements it is impossible to comment on the post construction management of the BRT.

4.13 Transport Study Greater Swords Area

4.13.1 ILTP Consulting have been informed by Fingal County Council that a transport study of the Greater Swords Area is underway. This study will improve greatly our understanding of existing and future travel demands and patterns. Progressing of the BRT further prior to the finalisation and publication of the Transport Study for the Greater Swords Area is premature.

4.14 Development Contribution

4.14.1 The subject service station was redeveloped following a planning application in 1999 (Ref. F99A/0349) and again following a planning application in 2005 (Ref. 05A/0123). Conditions requiring the payment of development contributions were attached to both permissions.

4.14.2 Cumulatively development contributions of approximately €94,000 have been paid to the Planning Authority within the last fifteen years.

4.15 Summary of Client Concerns

4.15.1 The current BRT proposals will have extremely negative consequences for our Client. Key concerns of our client are:

- The extent of the area of the CPO may preclude the continued safe operation of the service station and the business may have to close.
- The proposed modifications to the road network along the R132 and at the R132 / Boroimhe Road junction will make it considerably more difficult to exit the service station efficiently and safely. This may impact significantly on road safety and business.
- The proposed NTA BRT and the approved Metro North scheme cannot both be delivered. This uncertainty has and will continue to cause planning blight impacting on the undeveloped portion of the site. Also there is the possibility that additional lands may be required to be Compulsorily Purchased to accommodate both schemes. This would almost certainly cause the service station to have to cease operations.
- There is no detail on the future management and control of the BRT network and services.

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5 ILTP PROPOSED MODIFICATIONS TO NTA BRT SCHEME

5.1 Introduction

5.1.1 As outlined above the current NTA BRT proposals will have negative impacts on our Client. The full extent of these impacts is not yet clear as insufficient information has been made available by the NTA and our Client would like to reserve the right to comment further if and when greater details on CPO and other items are made available.

5.1.2 The provision of the BRT as currently proposed by the NTA may not allow the service station to continue to operate satisfactorily.

5.1.3 The NTA proposed BRT directly contravenes the stated policy objective which is, "*To minimise adverse impacts on the natural and built environment.*"

5.1.4 In view of the seriousness of the impacts of the current proposals on our Client the following modifications are proposed.

5.2 Proposed Modifications

5.2.1 There is currently a bus lane north and southbound on the R132 and adjacent to the service station. Buses pass along the road in dedicated lanes without impediment or delay.

5.2.2 The NTA BRT proposals will have a negligible impact on efficiency and travel times on the R132 in the vicinity of the subject site.

5.2.3 It is therefore proposed that:

5.2.4 The existing road and bus lane arrangements from north of the R132 / Boroimhe Road junction to south of the existing bus stops located south of the service station be maintained in their current arrangement.

5.2.5 Such a modification would remove conflicts between the NTA proposed BRT and the approved Metro North, would allow the existing service station continue to operate and would maintain vehicle capacity at the R132 / Boroimhe Road.

5.2.6 If it is considered that modification to the road network is required then these works and any CPO that may be required should be undertaken on lands to the east of the R132 and no works should be undertaken within Client's lands.

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6 SUMMARY & CONCLUSIONS

6.1 Summary

6.1.1 The NTA launched a public consultation on proposals for the BRT Preferred Route for the Swords / Airport to City Centre Corridor in October 2014.

6.1.2 The preferred route drawings are the first public drawings to show the impacts the proposed BRT development will have on individual landowners.

6.1.3 Frank Grant Garages Ltd, the owner of a service station on the Old Airport Road, County Dublin engaged ILTP Consulting to examine the impacts of the NTA proposed BRT on the service station.

6.1.4 This assessment has found the current NTA BRT proposals will have extremely negative consequences for our client. Key concerns of our Client are:

- The extent of the area of the CPO may preclude the continued safe and efficient operation of the service station and the business may have to close.
- The proposed modifications to the road network along the R132 and at the R132 / Boroimhe Road junction will make it considerably more difficult to exit the service station efficiently and safely. This will impact significantly on road safety and business.
- The proposed NTA BRT and the approved Metro North scheme cannot both be delivered. This uncertainty has and will continue to cause planning blight impacting on the undeveloped portion of the site. Also there is the possibility that additional lands may be required to be Compulsorily Purchased to accommodate both schemes. This would almost certainly cause the service station to have to cease operations.
- There is no detail on the future management and control of the BRT network and services.
- The progressing of a BRT on the Swords / City Centre corridor at this time is premature pending the finalisation and publication of the Transport Study for the Greater Swords Area.

6.1.5 In broader transport terms the NTA proposed BRT in the environs of the service station will:

- Have negligible impact on efficiency and travel times on the R132 in the vicinity of the subject site
- Reduce vehicle capacity on the R132/ Broroimhe Junction
- Have negative impacts for cyclists

6.2 Conclusion

6.2.1 The proposed BRT will impact very negatively on the existing service station and will prevent the approved Metro North being constructed.

6.2.2 The BRT proposals will reduce capacity on the R132 / Boroimhe Road junction and has a number of negative impacts on cyclists.

6.2.3 It is therefore proposed that:

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6.2.4 **The existing road and bus lane arrangements from north of the R132 / Boroimhe Road junction to south of the existing bus stops located south of the service station be maintained in their current arrangement.**

6.2.5 Our client would like to continue to liaise with the NTA in seeking to address these concerns.

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From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:14
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: 141128 _Carlton_Hotel_submission_on_proposed_BRT_Swords_City_Centre_Carton_Hotel.pdf

From: Ken Swaby
Organisation: ILTP Consulting
Address: Albert's House, Dunboyne, Co. Meath

Comments:
Dear Sir / Madam,

ILTP Consulting were asked by Carlton Hotel Dublin Airport to prepare a submission on the proposed BRT Swords / Airport to City Centre scheme.

Can you please confirm receipt of submission and should you have any queries please contact me.

Regards,

Ken Swaby
ken@iltp.ie

--
This e-mail was sent from a contact form on National Transport Authority (http://www.nationaltransport.ie)

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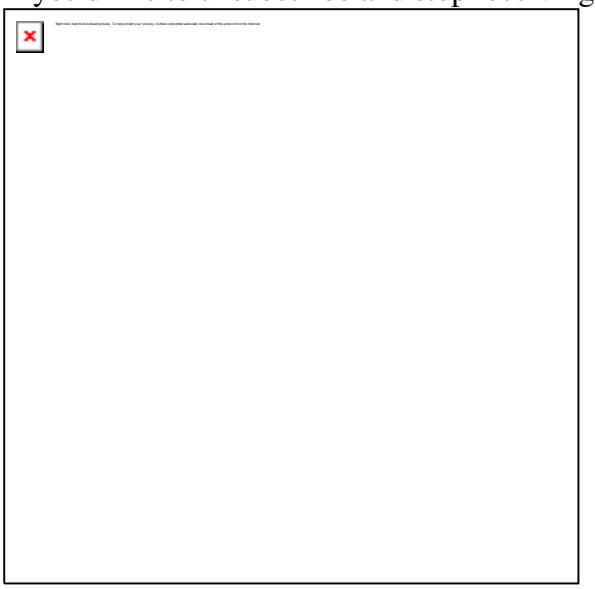

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Submission to NTA Bus Rapid Transit – Preferred Route Swords / Dublin Airport to City Centre Corridor

Client: Carlton Hotel Dublin Airport

ILTP
consulting

SUBMISSION TO NTA BUS RAPID TRANSIT – PREFERRED ROUTE SWORDS / AIRPORT TO CITY CENTRE CORRIDOR

Description:

NTA Submission

Author:

Michael Higgins

Ben Waite

Approved By:

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28 November 2014

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SUBMISSION TO NTA SWORDS / AIRPORT TO CITY CENTRE PREFRERRED ROUTE BUS RAPID TRANSIT ON BEHALF OF CARLTON HOTEL DUBLIN AIRPORT

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1 INTRODUCTION

1.1 Purpose of Report

1.1.1 The NTA launched a public consultation on proposals for the BRT Swords / Airport to City Centre Corridor Preferred Route in October 2014.

1.1.2 ILTP Consulting were requested by Carlton Hotel Dublin Airport to examine the impact the proposed BRT Preferred Route for the Swords / Airport to City Centre Corridor would have on the Carlton Hotel Dublin Airport and wider impacts from a traffic and transport perspective.

1.1.3 Chapter 2 provides an overview of activities at the Carlton Hotel Dublin Airport and the existing traffic and transport arrangements.

1.1.4 The BRT proposals in the vicinity of the Hotel are described in Chapter 3.

1.1.5 In Chapter 4 the impact of the BRT proposals is outlined and in some cases modifications are proposed or clarifications sought.

1.1.6 A summary and conclusion is provided in Chapter 5.

1.2 Meeting and Consultations

1.2.1 ILTP met with representatives of the NTA to seek further clarity on the proposals. ILTP and the Client also met with representatives of the NTA on-site to discuss and outline our Client's concerns. Our Client would like to continue the dialogue with the NTA post this consultation stage and prior to the scheme finalisation.

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2 DESCRIPTION OF EXISTING HOTEL ACTIVITIES AND TRANSPORT NETWORK

2.1 Introduction

2.1.1 The Carlton Hotel Dublin Airport is a 4 Star Hotel on a strategic route between Dublin City Centre and Dublin Airport located close to the airport at Dardistown.

2.1.2 The hotel has:

- 118 bedrooms and suites.
- Bar and restaurant facilities
- The hotel also frequently hosts conferences and weddings.

2.1.3 The hotel operates a 24 hour shuttle bus transfer service to Dublin Airport. This connectivity with the airport is important for the hotel as the main customer base comes via Dublin Airport.

2.2 Existing Layout Access Arrangements

2.2.1 The Carlton Hotel Dublin Airport is located off the R132. The hotel is set back from the road and there is a high quality landscaped area with signage and car parking to the front of the hotel adjacent to the roadway.

2.2.2 Currently vehicular access to the hotel is by means of an all movement junction as shown in Figure 2.1.

Figure 2.1: Existing Hotel and Access Arrangements with Hotel Landscaping

2.2.3 Right turning access from the R132 to the hotel is particularly important as the hotel relies on business from Dublin Airport located to the north.

2.2.4 In the general vicinity of the Hotel the R132 is a four lane carriageway with a bus lane in each direction.

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2.2.5 Northbound on the R132 there is an advisory on road cycle lane to the south of the hotel and an off-road cycle track to the north of the hotel. Southbound there is an advisory on road cycle lane north and south of the hotel.

2.2.6 The existing road layout as shown in the NTA *Proposed Scheme General Arrangement Drawings* is shown in Figure 2.2.

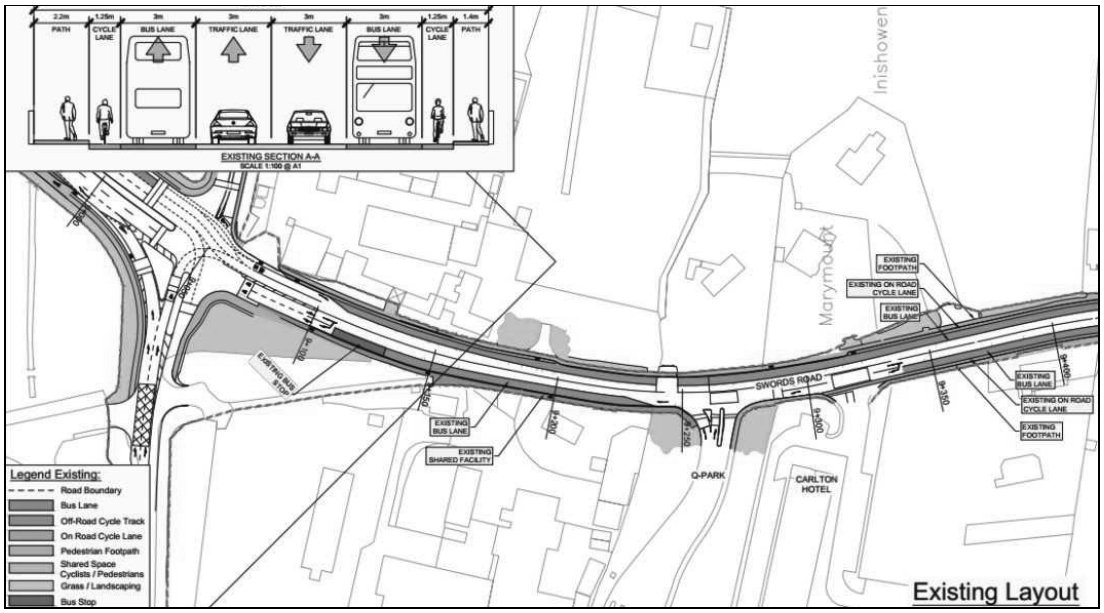

Figure 2.2: Existing Road Layout (Source: NTA *Proposed Scheme General Arrangement Drawings)*

2.2.7 One off houses and businesses are located in a linear fashion on both sides of the roadway in the vicinity accessing directly onto the roadway. Almost immediately to the north of the hotel is the access to the 'Quickpark' long stay airport car park. A bank is also located north of the hotel.

2.3 Planning Context and Future Development Potential

2.3.1 Local planning in the area is guided by the *Fingal County Development Plan* and the *Dardistown Local Area Plan* (LAP).

2.3.2 There is a local objective associated with the lands in the *Fingal County Development Plan* which states:

> *"416: Permit a hotel/conference centre subject to compliance with the recommendations of the ERM Report on Public Safety Zones."*

2.3.3 The Carlton Hotel is located within the Dardistown LAP lands. The hotel lands are zoned GE – General Employment, the objective of which is to, *"Provide opportunities for general enterprise and employment."* This allows for a wide range of land uses in principle.

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2.3.4 The subject site is located within Phase 1C in the phasing of the *Dardistown LAP*. This allows for the immediate development of the lands.

2.3.5 The existing hotel was granted permission in February 2005 (Ref. F04A/1519). One of the main items that was overcome during the planning was securing approval for the current access arrangement.

2.3.6 Our Clients lands are not fully developed. The Client has informed us that it is their intention to apply for planning permission for additional facilities and bedrooms at the hotel in the near future. Any proposed changes to the existing access arrangement that could adversely affect the development potential of these zoned lands is a major concern as it would affect the value of the lands and could curtail development which has the potential to increase employment in the area and provide for additional bedrooms in the vicinity of Dublin Airport.

2.3.7 It is noted that there is no funding currently in place for the proposed BRT scheme. There is a concern that if the scheme progressed through to the approval stage and was not implemented this could result in greater planning blight on these lands.

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3 DESCRIPTION OF NTA PROPOSALS – SWORDS TO CITY CENTRE PREFERRED ROUTE

3.1 Introduction

3.1.1 The preferred route for the Swords / Airport to City Centre BRT has now been published. The preferred route drawings are the first public drawings to show the impacts the proposed BRT development will have on the Carlton Hotel Dublin Airport.

3.2 BRT Proposals Adjacent to Carlton Hotel

3.2.1 The preferred route for the Swords / Airport to City Centre BRT passes the Carlton Hotel on the R132. The proposed arrangement is shown in Figure 3.1.

3.2.2 The carriageway width will increase from approximately 18.1m to 21m in the vicinity of the hotel. This will require an area of land at the front of the hotel to be the subject of a compulsory purchase order.

3.2.3 The area of land to be CPO will be larger than that required for the widening of the carriageway as an additional area of land will be required for construction works. Based on the drawings on public display it is expected that a strip of land of approximately 5m at the front of the hotel will be compulsorily purchased.

3.2.4 In addition to the CPO the NTA are proposing to make a number of other changes to the road layout in addition to the provision of the BRT line in the immediate vicinity of the hotel, including:

- Remove the yellow box at the entrance to the hotel.
- Removal of the right turning access to the hotel.
- Removal of the right turning egress from the hotel.
- Remove existing bus stops, which are currently provided approximately 160m south of the Carlton Hotel Dublin Airport. No replacement bus stops are indicated on the scheme drawings.
- An off road cycle track is to be provided southbound which will replace the existing on road cycle lane facilities.
- An on road cycle lane is to be provided northbound which will replace the existing on road cycle lane and off road cycle track facilities.

3.2.5 No BRT stop in the immediate vicinity of the Carlton Hotel is proposed in the initial stage of the scheme and only a possible future stop is shown. The closest BRT stops proposed for immediate construction are Swords Road/Airport BRT Stop to the north and the Northwood BRT Stop to the south. Both stops are approximately 1.2km from the Carlton Hotel.

3.2.6 There is a Future BRT stop proposed at Dardistown, but it is unclear if or when this BRT stop will be provided.

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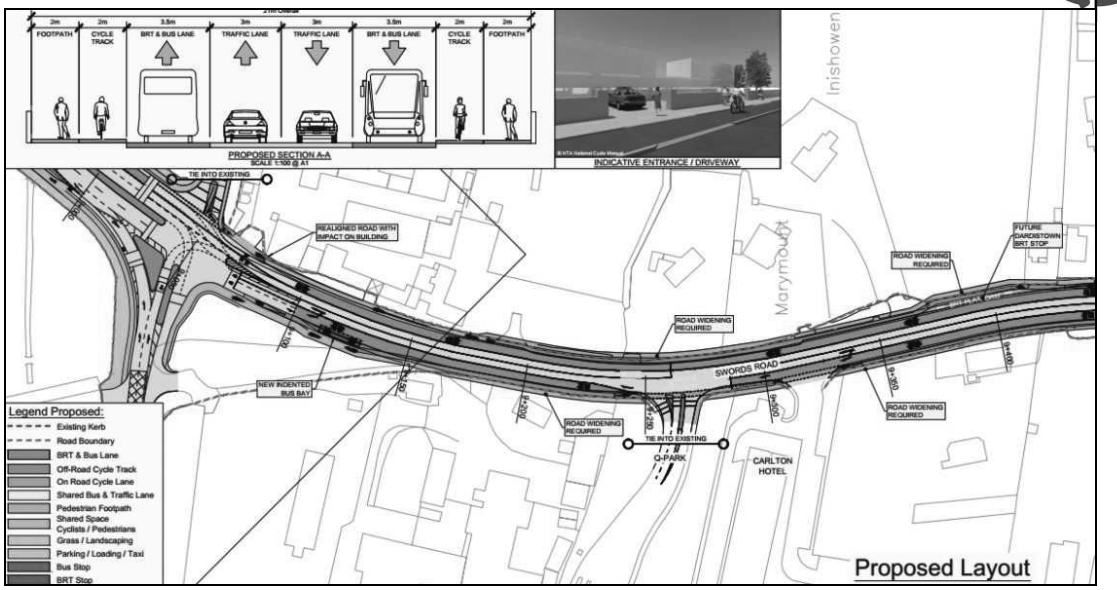

Figure 3.1: Proposed BRT arrangements adjacent to Carlton Hotel (Source: NTA)

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4 ISSUES ARISING FROM PROPOSED BRT AND PROPOSED MODIFICATIONS

4.1 Introduction

4.1.1 An analysis of the proposed BRT scheme has identified a number of areas of concern for the Carlton Hotel. These concern the particular arrangements proposed in the vicinity of the Carlton Hotel Dublin Airport and also wider concerns regarding the overall management and functioning of the BRT. These Concerns are outlined below.

4.1.2 Modifications to the scheme are proposed which address these concerns. The proposed modifications will provide improved facilities for pedestrians and cyclists and reduce the scope of works and will have a negligible impact on the overall efficiency of the proposed BRT scheme.

4.2 Loss of Landscaped Area to the Front of Hotel

4.2.1 A strip of land at the front of the hotel is proposed to be subject to a permanent CPO. It is estimated that this will be approximately 4 – 6 metres in width across the entire hotel.

4.2.2 The CPO could have a very negative impact on the hotel. Most obviously a high quality landscaped area at the front of the hotel will be permanently removed. An entrance of high quality for a 4 star hotel is crucial to promoting business. Not alone does it attract passing trade, but it can be an important factor in the selection of a hotel for a wedding or conference.

4.2.3 While in the long term new landscaping could be provided this would require the removal of 4 no. car parking spaces and has not been provided for as part of the BRT Scheme. The four spaces in front of the hotel are very important as these facilitate short term visitors, particularly those booking events and conferences.

4.2.4 The CPO is proposed to facilitate the widening of the road. The impact of this will be to bring the roadway closer to the hotel and may impact negatively on the visual amenity and on noise levels for guests within the hotel.

4.3 Right Turn Access and Left Turning Egress

4.3.1 The proposed BRT scheme arrangements will change the access arrangements at the hotel from an existing all movement access to a left in, right out arrangement. There are no easy, convenient U-turn facilities close to the hotel.

4.3.2 Such a change will significantly curtail access to the hotel. Right turning access to the hotel is particularly important as the hotel is reliant on easy access from the airport, business clients and hosting meetings and conferences. The shuttle bus service from the Airport currently turns right into the hotel, which under the proposals would be prohibitied.

4.3.3 It is vital for the hotel in attracting business that an all movement vehicular access to the hotel be maintained.

4.4 Removal of Yellow Box

4.4.1 It is proposed to remove the existing Yellow Box on the R132 at the entrance to the hotel. The removal of the yellow box is linked with the removal of right turning access and right turning egress from the hotel. The provision of the yellow box also facilitates left turn vehicles egressing the hotel.

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4.4.2 The removal of the Yellow Box, particularly in the context of the widening of the carriageway and the introduction of up to 18m vehicles and potentially 26m vehicles onto the roadway, will make access and egress from the hotel more difficult.

4.5 Impact on Cyclists

4.5.1 The introduction of 18m or possibly 26m BRT vehicles onto the road network will have a negative impact on cyclists. By virtue of their size alone these buses will intimidate cyclists and potential cyclists and be a hindrance to the promotion of cycling.

4.5.2 There are specific issues with regard to the NTA proposed cycle facilities in the vicinity of the hotel. An off-road cycle track is proposed for the Northbound lane to the south of the hotel. Outside the hotel this changes to an on road cycle lane. Changes in grade and alignment such as this are unwelcome to cyclists.

4.5.3 All vehicles entering the hotel with the proposed new arrangement will be left in only. This increased turning movement across a bicycle lane places cyclists in a more vulnerable position. In this instance the vulnerability of the cyclist may be increased by the BRT lane.

4.6 Construction and Construction Traffic Impacts

4.6.1 There is very little detail available at this point regarding the construction and construction traffic impacts of the proposed BRT.

4.6.2 It can be expected that road and lane closures and significant levels of construction traffic will be experienced on an ongoing basis on many parts of the road network. The NTA have estimated a construction period of approximately 2.5 years.

4.6.3 Construction works impact particularly negatively on hotels as the works deters passing trade and have a lingering impact on forward bookings for weddings and conferences.

4.7 Impact on Future Development and Potential Blight

4.7.1 The hotel site is zoned GE – General Employment in the *Dardistown Local Area Plan*. There is a local objective associated with the lands in the *Fingal County Development Plan* 2011 – 2017 which states:

> *"416: Permit a hotel/conference centre subject to compliance with the recommendations of the ERM Report on Public Safety Zones."*

4.7.2 The Client has informed us that it is their intention to apply for planning permission for additional facilities and bedrooms at the hotel within the existing site in the near future. Such a development would generate construction and post construction permanent jobs and promote development along the Airport to City Centre corridor.

4.7.3 If the Proposed BRT Scheme is implemented as proposed, it could have a very negative impact on the future development potential of our Client's lands. In addition to the access restriction, additional landscaping could be required as part of any future planning permission, to replace the current landscaping to the front of the hotel. Therefore the loss of important front parking spaces could arise in the future as a result of the scheme.

4.7.4 The issue of planning blight could also arise if the scheme progresses to approval stage but is not implemented, as is the case with Metro North. Therefore the scheme should not progress to planning stage until funding commitments and precise timelines for implementation are agreed by Government.

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4.8 Adjacent Junction to Quick-Park

4.8.1 The hotel entrance predates the adjacent entrance, which is signalised. The layout of this junction is problematic due to the poor junction layout. This requires buses to the car park to enter the existing bus lane to make the right turn into the site. This will arise with the proposed BRT also if not addressed in next stage of evaluation.

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5 PROPOSED MODIFICATIONS

5.1 Introduction

5.1.1 Following on from our appraisal of the current BRT proposals there are significant concerns with the proposed scheme in the vicinity of out Client's lands.

5.1.2 The following are a range of suggested modifications, which could be considered. However our Client would like to have further dialogue with the NTA on any proposed alterations prior to scheme finalisation.

5.2 Overall Road Layout

5.2.1 In the absence of measures to address the concerns raised in respect to the Carlton Hotel we would request that the status quo remains.

5.2.2 Proposed Modification:

The existing bus lane arrangements and road layout in the vicinity of the Carlton Hotel Dublin Airport be maintained in any BRT system.

5.3 Removal of Bus Stops

5.3.1 It is currently proposed by the NTA to remove existing bus stops which are currently provided north and southbound on the R132 approximately 160m south of the Carlton Hotel. No replacement bus stops are indicated on the scheme drawings in the southbound direction.

5.3.2 The removal of these bus stops will make accessing of the hotel for guests and staff more difficult. The stops are served by bus routes 16, 16c, 33, 41, 41a, 41b and 41c. The removal of these bus stops will weaken public transport linkages with the City Centre, South Dublin city and areas such as Balinteer and Rolestown.

5.3.3 Proposed Modification:

It is proposed that the existing bus stops approximately 160m south of the Carlton Hotel Dublin Airport be maintained in their current location

5.4 Proposed New Access Arrangement

5.4.1 If the scheme progresses, then the existing junction to Quick-Park should be appropriately modified to overcome the current design problems associated with the layout and in particular with the right turn movement of buses into the site. This would also offer the opportunity to improve the BRT scheme and facilitate a more convenient BRT stop and pedestrian crossing facilities.

5.4.2 Proposed Modification

It is proposed that the existing access to Quick-Park be modified to better accommodate the proposed BRT scheme

5.5 Proposed Location of BRT Stops

5.5.1 No BRT stop in the immediate vicinity of the Carlton Hotel is proposed in the initial NTA scheme. The closest BRT stops proposed are Swords Road / Airport BRT Stop to the north and Northwood BRT Stop to the south. Both stops are approximately 1.2km from the Carlton Hotel.

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5.5.2 There is a Future BRT stop at Dardistown, but it is unclear if and when this BRT stop will be provided, therefore the Swords Road / Aiport and Northwood BRT Stops will be the closest stops to the Carlton Hotel.

5.5.3 Users of BRT services are not expected to walk 1.2km to access BRT services. Hotel guests, or those with luggage are even less likely to use the BRT. Effectively the BRT will be of no use to guests or staff of the Carlton Hotel.

5.5.4 Proposed Modification:

It is proposed that the future Dardistown BRT stop be relocated to the location shown in Figure 5.1 and be put in place from the commencement of BRT services.

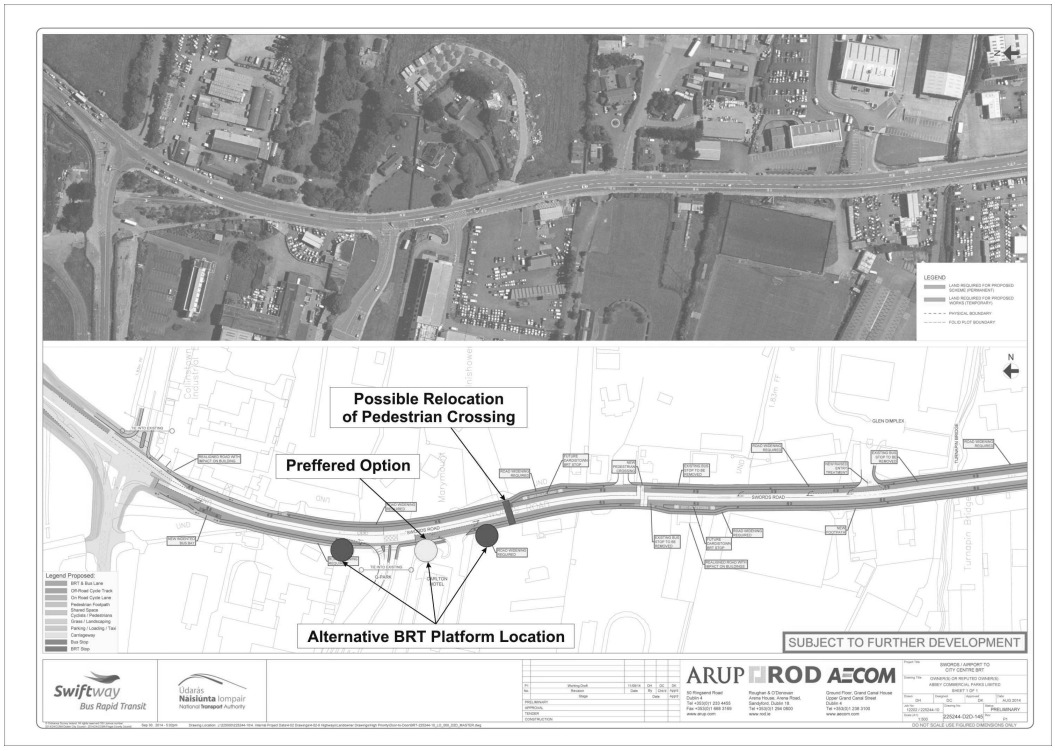

Figure 5.1: Proposed Relocation of BRT Dardistown Stop

5.6 Pedestrian Crossing R132

5.6.1 There is a proposed pedestrian crossing of the R132 150m south of the Carlton Hotel Dublin Airport. This crossing is located away from pedestrian desire line.

5.6.2 The proposed pedestrian crossings should be located at the areas of greatest pedestrian activity and demand. On the section of the R132 between the M50 and the Old Airport Road the greatest level of pedestrian activity will be generated by the Carlton Hotel and the nearby Quickpark and Bank located to the north of the hotel. Therefore any pedestrian crossing should be located in the vicinity of these facilities and adjacent to the relocated Dardistown BRT stop.

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5.6.3 Proposed Modification:

It is proposed by ILTP that any new pedestrian crossing of the R132 be provided at the location shown in Figure 5.1 adjacent to the relocated Dardistown BRT Stop.

5.7 Wider Issues of Concern

5.7.1 In addition to these issues specific to the general vicinity of the Carlton Hotel Dublin Airport there are other more general items which are nonetheless a cause for concern.

5.8 Post Construction Ownership of BRT Carriageway

5.8.1 Along the route of the proposed BRT it is proposed to CPO land. On completion of the construction of the scheme it is uncertain who will own these lands and the BRT network. The future ownership of the BRT lanes could impact on the maintenance and management of the carriageway and traffic signals.

5.8.2 In addition the ownership of the network may impact on the provision and use of accesses including future planning application that access onto the R132. The effect of the BRT may be to blight lands along the length of the network. Clarity is required as to the future ownership of the BRT carriageway.

5.8.3 Proposed Modification:

Clarification as to the implementing and maintaining authority of the BRT network should be set out in the Scheme and any likely consequences identified.

5.8.4 Should this not be accepted and lands adjacent to the hotel be the subject of a CPO then an alternative proposed modification is outlined below.

5.8.5 Alternative Proposed Modification:

The ownership of the BRT network be ceded to Fingal County Council as Roads Authority and managed by them post construction.

5.9 Post Construction Management of BRT Carriageway and Services

5.9.1 Arrangements for the post construction management of the BRT line have not been set out. Issues which have not been addressed and make a full evaluation of the proposed scheme impossible include:

- The use of BRT by private buses
- The use of BRT by taxis
- The management of traffic signals including SCATS
- Access on/off roadways on which the BRT is routed
- The body responsible for the provision of BRT vehicles has not been identified
- The body responsible for the provision of BRT services has not been identified

5.9.2 In the absence of detail on any of these arrangements it is impossible to comment on the post construction management of the BRT in detail.

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5.9.3 Proposed Modifications:

The NTA should confirm which modes of transport will be permitted for use on the proposed BRT route and to clarify if they can be used by private buses and taxis

A detailed report clarifying the items above and other management issues is required. An opportunity for third parties to comment on the proposed arrangements is also required prior to the progressing of the BRT.

5.10 BRT Funding, Delivery and Impact on Future Development

5.10.1 The presence of a scheme that has no funding in place can have serious negative consequences on the existing businesses and properties and can result in significant planning blight as occurred with Metro North and many other schemes.

5.10.2 Proposed Modification:

The proposed BRT project should not be taken forward to planning stage until there is a clear commitment from Government on Funding and a clear timescale for implementation so as to avoid unnecessary planning blight on properties subject to CPO or adjacent to the proposed route.

5.11 Transport Study Greater Swords Area

5.11.1 ILTP Consulting have been informed by Fingal County Council and the NTA that a transport study of the Greater Swords Area is currently underway. This study could materially affect our Client's view on the proposed BRT Scheme. At a minimum it would improve greatly our understanding of existing and future travel demands and patterns and possible alternative scheme. Progressing of the BRT further prior to the finalisation and publication of the Transport Study for the Greater Swords Area is premature.

5.11.2 Proposed Modification:

The Transport Study of the Greater Swords Area should be finalised and published as a matter of urgency. No further work on the Swords / Airport City Centre BRT should be undertaken pending the publication and analysis of the findings of this study with regard to the BRT.

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6 SUMMARY & CONCLUSIONS

6.1 Summary

6.1.1 This submission has been prepared by ILTP Consulting on behalf of Abbey Commercial Parks Ltd, the owners / operators of the Carlton Hotel at Dardistown, County Dublin.

6.1.2 The proposed BRT will have a number of potentially negative impacts on the transport network and the viability of the Carlton Hotel Dublin Airport including:

- The CPO of an area at the front of the hotel requiring the loss of high quality landscaping, signage and possibly 4 no. car parking spaces.
- Removal of the yellow box at the entrance to the hotel.
- Removal of the right turning access to the hotel.
- Removal of the left turning egress from the hotel.
- Removal of the existing bus stops which are currently provided north and southbound on the R132 approximately 160m south of the Carlton Hotel Dublin Airport.
- Negative impacts on cyclists
- Uncertainty regarding the management and overall operation of BRT services may hinder development.
- Potential planning blight on the subject lands
- Construction will reduce passing trade and dissuade future conference and wedding bookings

6.1.3 The current proposed BRT scheme in the vicinity of the Carlton Hotel will have a number of very negative impacts and will deliver no tangible benefits unless the scheme is modified.

6.1.4 Therefore a number of proposed modifications have been set out in Chapter 5 for further discussion and consultation with the NTA.

6.2 Conclusion

6.2.1 The proposed BRT scheme in the vicinity of the Carlton Hotel Dublin will deliver no improvement in bus efficiency or travel time and due to the removal of existing bus stops may in fact disimprove public transport in the immediate area in the short term.

6.2.2 The proposed BRT scheme will also significantly reduce vehicular accessibility to the hotel and as a result this could undermine the business model for the Carlton Hotel. The proposals could also reduce the future development potential of the lands.

6.2.3 There are a number of modifications proposed, which could help address many of these concerns and we would ask the NRA to continue dialogue with us and our Client in addressing these concerns.

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tel: 01-8255700 fax: 01-8255730
www.iltp.ie info@iltp.ie

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:45
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: 141128Submission_Dan_Dooley_Group_Ltd_Proposed_BRT_Swords_Airport_to_City_Centre.pdf

From: Ken Swaby
Organisation: ILTP Consulting
Address: St. Albert's House, Dunboyne, Co. Meath

Comments:
Dear Sir / Madam,

ILTP Consulting were asked by Dan Dooley Group Ltd. to prepare a submission on the proposed BRT Swords / Airport to City Centre scheme.

Can you please confirm receipt of submission and should you have any queries please contact me.

Regards,

Ken Swaby
ken@iltp.ie

--
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0482b

ILTP consulting

National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2.

28/11/2014

Dear Sir / Madam

Re. Proposed BRT Swords / Airport to Dublin City Centre Submission on behalf of Dan Dooley Group Ltd., Knocklong, Co. Limerick

Our Client Dan Dooley Group Ltd. has very recently become aware of the proposed BRT scheme from Swords / Airport to City Centre. Dan Dooley Group Ltd. own lands adjacent to the proposed BRT route on the R132 at Dardistown, Co. Dublin. The subject lands are located south of the Carlton Hotel Dublin Airport and north of the Royal College of Surgeons Sports facilities.

The subject lands are currently used commercially as a petrol station and for car and motor related services. All movement access to the lands from the R132 is currently provided and the lands form part of the Dardistown LAP.

A preliminary analysis of the proposed BRT scheme has identified key areas of concern for our Client including:

- The CPO of Client lands
- Access to the subject lands
- Impact on existing business
- The post construction management and ownership of the BRT network.

Our client would like an opportunity to discuss with the NTA the impacts of the proposed BRT scheme and to liaise with the NTA in seeking to fully understand and address these concerns and other issues that may arise on greater analysis of the proposed BRT scheme.

Yours faithfully,

Christy O'Sullivan

Managing Director

c.c. Dan Dooley Group Ltd.

ILTP Limited
Registration No. 336330
Directors:
Christy O'Sullivan, Marie O'Sullivan

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Regional Office:
Cork: cork@iltp.ie

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 16:59
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Proposed Swords BRT
1. Overall it is good to see investment in transport for Swords.
2. Proposed route will cause traffic problems in some areas which will not be alleviated by the BRT.
3. I see no reason for all the proposed BRT lanes as there is a QBC along much of the route with only minor upgrading of certain junctions required. Areas such as Santry, Whitehall and Drumcondra are more of a problem traffic wise. The Swords bypass along the R132 would only require minor upgrades as opposed to the major disruption which is proposed.
4. Removal of road footbridges at Seatown and Drinam Road should be reviewed. These are very busy footpaths crossing the R132. The safest route for pedestrians is total separation from traffic, the proposed pedestrian crossings would involve three pelican crossings to cross one road which is totally unacceptable. My family are regular users of the Drinam road bridge and would be endangered by having to use road level crossings.
5. As the bridge crossings are very busy at peak periods, transferring them to road level with pelican crossings will have a negative impact on traffic flow along the R132.
6. The proposed route and rearrangement of the Drinam road/R132 junction would make trying to turn onto the R132 to head north very problematic for residents of Foxwood and Drinam road.
7. Considering the number of Swords residents who work in the airport there is no real benefit offered by BRT to those residents. As the BRT has priority along the route current car traffic would be disrupted while offering no benefit to local use.
8. No proposed schedule is included. As above, many Swords residents could switch to public transport if a service was provided to the airport from Swords, especially early morning as many staff in the airport start from 0400 onwards.
9. Why are bus and BRT stops segregated?
10. Has any thought benn put into providing a park and ride facility. Currently, many estates adjacent to bus stops and shopping centers are used by commuters and shoppers.

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 26 November 2014 12:20
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: GSBB_-Swiftway-Bus-Rapid-Transit-Route.docx

[redacted]

Comments:
Please find attached objection form

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0484b

'Swiftway BRT – Swords/Airport to City Centre Proposed Scheme Consultation',
National Transport Authority,
Dún Scéine,
Harcourt Lane,
Dublin 2. **Samhain 2014**

Don té lena mbaineann sé

Is mian liom/linn ábhair bhuartha a ardú maidir leis an mbealach atá beartaithe don scéim nua bus sciopaidh idir Sord/Aerfort agus Lár na Cathrach.

Tá mo pháiste/í/ ár bpáiste/í ag freastail ar Ghaelscoil Bhrian Bóroimhe atá ar an mbealach atá beartaithe don scéim Nua.

Tá mé/muid buartha faoi na nithe seo a leanas:

1. Is gá do thuismitheoirí áirithe a bpáistí a thiomáint ar scoil. Má leanann an sceim ar aghaidh mar atá beartaithe, ní bheidh aon pháirceáil idir an stop ag Coill na nÚll agus an stop ag Seanbhaile. Cruthóidh sé seo neart fadhbanna do thuismitheoirí a bheidh ag iarraidh a bpáistí a thiomáint ar scoil in am agus bainfidh sé an rogha sin uathu.

2. Beidh brú ar thuismitheoirí a gcaranna a pháirceáil sna heastáit ata cóngarach don scoil (Geata Bhunbaire, Radharc an Chaisleáin agus Gleann an Mhuilleora) agus cuirfidh sé sin brú ar na heastáit chéanna

3. Caithfear bheith airdeallach ar shábháilteacht na gcoisithe agus an bealach nua á dhearadh. Níl ach dhá thrasnú beartaithe taobh na scoile agus is gá go mbeadh níos mó ann chun cur le sábháilteacht na bpáistí a shiúlann ar scoil.

4. Beidh níos mó trácht ar an mbóthar, go háirithe ar maidin agus tuismitheoirí ag iarraidh a bpáistí a sheoladh ar scoil agus cruthóidh an trácht bhreise seo contúirt sa bhreis do leanaí.

I/We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme. We wish to raise concerns about the preferred route identified for the proposed Swords/Airport to City Centre Swiftway scheme.

My/Our child currently attends Gaelscoil Bhrian Bóroimhe, which is on the preferred route identified for the proposed Swiftway scheme.

I/We have a number of concerns regarding this route:

1.It is necessary for some parents to be able to drive their children to and from the school, the preferred route identified means that parents will no longer be able to park between the proposed Applewood and Oldtown Stops. This will create significant difficulties for parents trying to get their children to school on time and will mean they are no longer in a position to drive their children to school.

2. Parents will be forced to park their cars in nearby estates (Bunbury Gate, Castleview and Millers Glen) leading to further congestion in those estates.

3. Pedestrian safety needs to be taken into consideration when new bus routes are being designed. There are only two pedestrian crossings proposed on the preferred route between Castlewood Avenue and the Gaelscoil. Additional safe pedestrian crossings are required on this route to ensure the safety of children walking to school.

4. There will be an increased volume of traffic on this road, particularly at morning peak times, leading to further congestion and delay for parents trying to get their children to school and also further danger for children walking to school.

[redacted]

Is féidir an litir a úslódáil ag an nasc seo a leanas/*Upload this file to NTA Website at the following link*:

http://www.nationaltransport.ie/consultations/public-consultation-on-swiftway-bus-rapid-transit-swordsairport-to-city-centre

An dáta is deireannaí i gcomhair aighneactaí ná 28-11-14/*Closing date for submissions is Friday 28th November at 5pm*

[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:47
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
It's a disgrace that we have no bus service

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:46
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
We desperately need a bus service. We are a young estate with lots of children who really need this .

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 12:31
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation
Attachments: Knocksedan_Residents_Submission.docx

From: Pat Ward
Organisation: Knocksedan Residents
[redacted]

Comments:
Please find attached submission of behalf of the residents of Knocksedan.

--
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Submission on behalf of Knocksedan Demesne Residents Management Company

28th November 2014

BRT Consultation
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2

Re: Bus Rapid Transit (BRT) / Swiftway Swords to City Centre Route

To whom it may concern

Knocksedan Demesne is a residential development now ten years in situ on the outer edge of Swords and must prominently feature on a feeder bus route to one of the main Swords Swiftway stops.

There are 163 houses within the development and building has commenced on phase II which will see a further 189 houses built in the short term.

Presently there is no public transport service whatsoever servicing the residents of Knocksedan despite our best efforts to secure same over this past 10 years. This coupled with an increase in family size alongside the additional houses currently under construction is not acceptable.

We as residents require and deserve access to a public transport service which should also include a school bus service for the ever increasing demand.

It is in this context, we urge you to seriously consider and approve as part of your deliberations a feeder bus service connecting Knocksedan with the BRT / Swiftway proposal should it proceed.

Should you require any further information or wish to meet directly with the resident directors, please do not hesitate to contact me directly.

Looking forward to your favourable response.

Yours Sincerely

Pat Ward
Resident Director
On behalf of Knocksedan Demesne Residents.

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:58
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

From: Garret Weldon
Organisation: JW Weldon
Address: 55 clarendon street, Dublin 2

Comments:
Dear Sirs

JW Weldon of Clarendon Street, Dublin 2 has traded in Dublin city centre for four generations. We are opposed to the Proposed Swiftway BRT – Swords/Airport to City Centre Scheme as it is currently proposed.

• Dublin City has a Georgian and Medieval Historic city centre; the city centre can be walked easily. However, a number of factors such as weak transport infrastructure, the sprawling nature of the city, poor planning enforcement and inadequate footpaths for pedestrians detract from Dublin's strengths. BRT will further impede on the available footpath space.
• The number of streets that can take a BRT is limited.
• The bus was the most popular transport modal choice with 34% preferring its use to access the city centre, 20% of respondents favoured gaining access to the city centre by car according to Dublin City Council survey of Dubliner's opinions Your City Your Voice Survey in 2012
• The proposed NTA route map is creating unprecedented problems for car borne shoppers.
• The number of route changes and cessation of junctions is such that we have no confidence that car users will continue to use city centre. To give an example when the Busgate in College Green was introduced, a simple change, it caused a drop of 20% in car users coming into city centre according to Dublin City Council reports.
• Car parks accommodate 16-18 million cars annually. Car borne shoppers may only come to city centre 5 or 6 times a year. Significant changes in between visits will break the visitors' habits, which once broken it may never be re-established.
• Infrequent visitors to Dublin to for instance GAA matches, soccer matches, concerts in The 3 Arena or other venues in city centre will be impeded by restrictions in accessing the city.
• The current use of city centre car parks is down. Can the NTA justify the expected increased growth they are using in their proposal – factual data.
• The extent of no left/right turns for traffic as indicated requires a full overview of a city wide route map to ensure car bound traffic can travel to all destinations.
• This is not a full consultation as promised as only one route is published and even that is subject to further development according to each drawing. Under EU Law more than one option is required in such a proposal as put forward by Swiftway
• To prepare a plan for BRT without fully considering other modes of transport, particularly cars is simplistic in the extreme and unwise in the understanding of the outcome expected. There is no Traffic Plan for Dublin as part of the Swiftway proposal for Swords to City Centre.
• BRT is a significant disruption to the existing public transport system.
• BRT is considered suitable only for moderately used traffic corridors. In the proposal all routes are major arteries to the city and heavily used.
• BRT is a short-term solution at best and some research indicates it can be more expensive to operate than a light rail system.
• Is BRT value for money in the present climate?

• NTA has not shown the projected passenger load that will use this service. Difficult to see the economic benefit, NTA's own 2012 report stated a bigger system is needed. (Bus Rapid Transit Core Network Report 2012 – NTA – page 72)
• JW WELDON welcomes public transport but the population in the whole of Ireland is 6.8 million people and they need to be serviced as well. Not only the 42,738 Swords urban area/68,000 Swords local area. (According to the CSO last census (2011) figures.)
• Any loss of access to the city centre will drastically effect trade and ultimately the level of rates that can be imposed. It is imperative that the NTA understands that most inward investment decisions for city centre are made outside of Ireland. Dublin City Centre is competing with Dundrum, Liffey Valley, Blanchardstown etc for this investment.
• Have NTA carried out an economic impact study on City Centre in light of the fact that Dublin City Council generates €65 million in rates in the prime retail core in Dublin 1 & 2.
• 90% of public transport will go through O'Connell Street.
• Previous experience with long buses (bendy bus) were at best mixed.
• In comparison to light rail, BRT capacity is very low and not much ahead of the bus system.
• BRT is intended to operate for a significant part of the route in a fully dedicated rights of way corridor. Nowhere in this proposal is this evident.
• At no time is there any mentioning of the rights of private bus operators on that route and how would this affect them.
• If BRT is implemented are taxis still allowed to use of the Airport to city centre bus corridor.
• If BRT is to be implemented the public transport model needs to be changed to the European model.
• BRT systems operating in Europe service in the main outside city centre and operate as an ordinary bus service inside city centre.
• The BRT as proposed a limited integration with other public transport modes. However if BRT was to run up to Bus Aras there will be integration with other modes of public transport ie Luas, rail and Bus Éireann routes.
• This plan as proposed is an interim measure why not look at a long term solution. DART Underground or other options.
• Give existing bus services priority at traffic lights to decrease their journey time.

Kind regards

Garret Weldon

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 11:33
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:44
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
To whom it may concern,

I wish to make a submission in relation to the proposed Bus Rapid Transit Scheme. I would like to state MY OPPOSITION to the construction of the scheme as it is currently proposed. The reason for my objection is based on the following:

Safety for Children / Adults

The construction of such a roadway will inevitably constitute an increased risk to the safety of children playing in the Bunbury Gate / Brides Glen / Glen Ellan / Sandford Wood / Applewood / Castleview / and South Bank areas.

Points of concern include

• The removal of the grass margins going up the length of the Glen Ellan Road resulting in children walking in close proximity to the road. This is of particular concern at areas of high pedestrian traffic approaching the three local primary schools.

• Increased volumes and regularity of the BRT vehicles using the Glen Ellan Road will result in children being unable to walk safely across to their local shops, play ground and all weather facility.

• Significant issues and concerns relating the safety of children, pedestrians and cyclists crossing the roads at any of the junctions that are intersected or impacted by the BRT

Impact on Pedestrians

The removal of pedestrian bridges along the route will significantly impact on pedestrian safety and ability to access other parts of Swords.

Removal of the existing Parking Facilities at local Primary Schools

Within the current proposal all of the on street parking rights outside the two schools – Gaelscoil Bhrian Boroimhe (where both my children attend) and Swords Educate Together will be completely removed. Together these schools have almost 900 pupils attending with many of the children travelling some distance each morning. As was confirmed at the recent consultation there are no plans to make any provision for the approximate 50 car spaces that will be removed with the development of the BRT directly outside the schools. Without the provision of a suitable number of car parking spaces in close proximity to the school

all roads within the area will be blocked up at peak times in the morning. This will impact significantly on all the neighbouring estates and the local community.

Commuter Parking

Without a park and ride facility and in the absence of an alternative transport service; a major concern is the potential for people commuting to drive into the estates along the proposed route, leaving their cars for the day to use the bus – thus depriving residents of their parking and further eroding the quality of life.

Impact at all Traffic Junctions

The current proposal to replace all roundabouts along the Swords route with wider junctions and traffic signals that will prioritise the Swiftway bus, resulting in major traffic implications for cars travelling on what is already a very congested route.

Pedestrianisation Jug back lane

The proposed pedestrianisation of Jug Back Lane will have a major impact on traffic on the other roadways in the area, in particular it will cause significant problems for 550 students attending St Finians Community College resulting in a major bottleneck when students are being dropped off and collected. It will also result in a potential black spot for anti social behaviour.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

BRT Concept and Metro North

I believe that we need improved transport solutions in Swords which is a public transport wasteland in comparison to the rest of the city.

I welcome the commitment to review the proposal for Metro North. However, it is inevitable that the development of this BRT programme will delay the development of the Metro North project: firstly by reducing the funds available for capital transport infrastructure investment and secondly by catering for some of the demand that would have been there for the Metro thus lessening the urgency to develop the Metro project.

BRT MUST NOT be a cheap alternative to Metro North

Impact on local bus service and other road users

Traffic signal priority to the BRT will have a negative impact on other road users and may lead to the deterioration of other bus services operating in the area. The existing Swords Express route via Dublin Port is currently achieving similar travel times to those proposed by BRT and along with Dublin Bus currently serves our community well. This subsidised state BRT system will be competing with these bus services and may make existing routes unviable.

Environmental impact

Felling of trees will be required along the route negatively affecting the aesthetics and local environment. This along with the lengthy construction process will significantly impact on local resident's quality of life.

Conclusion

To summarise, I am VEHEMENTLY OPPOSED to the construction of the BRT system as outlined in the current proposal unless all of the above issues that will seriously affect our area are adequately dealt with. There are alternatives which do not involve destroying local amenities, placing children and families at risk along with causing significant disruption and ongoing problems for our local community.

I look forward to the outcome of the consultation process.

Grainne White

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 15:49
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
To Whom it May Concern,

I wish to submit my OBJECTION in respect of the proposed Swiftway Bus Rapid Transit – Swords/ Airport to City Centre, with particular emphasis upon the selected emerging preferred route for the BRT from the R132 at the Estuary Roundabout through the Glen Ellan distributor Road to the proposed terminus in Oldtown.

This section of the proposed route flies in the face of due diligence in respect of proper planning and assessment of local transport objectives and requirements as set out by an elected body for an area, which in turn will lead to unnecessary and unacceptable impacts upon the receiving environment.

While the Route Options Assessment Report assesses transport planning policy documents in respect of the proposed scheme, and states in its conclusion (Section 2.8) that 'The need for the scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North. BRT is identified as serving this purpose and allowing key development areas such as Swords to continue to develop in advance of this'. The route selected does not take account of the transport objectives within the Fingal Development Plan 2011 to 2017 or the specific objectives of the Oldtown – Mooretown Local Area Plan (LAP).

Within Section 6.2 of the Route Options Assessment Report, where the stage 1 assessment is carried out, a specific route option should have been assessed in accordance with the Key Transport objective of the Oldtown – Mooretown Local Area Plan, i.e. Section 3.2.7 of the LAP 'Quality Bus Network'. This quality bus network route was based upon an Integrated Traffic Model which was prepared for Swords as part of the document 'Your Swords, An Emerging City, Strategic Vision 2035'. The absence of this route which would have been in accordance with Fingal County Councils transport policy for the local area, shows an absence of proper planning assessment within the Route Selection process.

The preferred route selected for this section of the BRT is also in breach of the Local Area Plans Strategic Vision and Development Strategy for the Glen Ellen Road extension, in particular in respect of Section 3.2 'Movement Strategy and Transportation Infrastructure', where section 3.2.5 'Glen Ellan Main Street' of the LAP sets out the proposed objectives of the LAP for the Glen Ellan Road. The LAP objective is for a 6m carriageway with cycle facilities, 4m wide footpaths and 1.5m wide tree lined verges, whereas the BRT is proposing 13m wide carriageway with 2m wide shared surface cycle facilities, 2m wide footpaths and the omission of the tree lined verges. While Section 6.3.2 of the Route Options Assessment Report references the LAP, it then proceeds to disregard the requirements and objectives of the LAP without taking due cognisance of it as a constraint upon the proposed scheme.

Through breaching specific objectives of the LAP, e.g. Key Objectives Transport 'Redesign the Glen Ellan Road Extension so that it's function changes from a distributor road to a main street, which will serve 2 schools, a large park and Local Centre, in addition to dwellings' the proposed route as planned will have a direct and unacceptable impact upon the existing properties which bound the Glen Ellan distributor Road in respect of noise, air quality, road safety, transport integration, landscape and visual.

Through the planned frequency of buses along this route at 4 minute intervals during peak times in conjunction with the traffic corridor being moved closer to properties, this will create a noise so loud, so continuous, so repeated, of such duration that it will be in breach of Statutory rights of the residents in accordance with the Environmental Noise Regulations 2006. This in addition will be accentuated as the proposed scheme removes the existing verge and trees along the distributor road which would have provided some level of noise screening (however minor). The route also proposes to run with these bus frequencies past the 2 existing sensitive receptors in the 2 Primary Schools (Swords Educate Together and Gaelscoil Brian Bóroimhe (where both my children attend), which will subjected to the unacceptable levels of noise.

As the Route Options report ignores the transport objectives set out in 'Your Swords, An Emerging City, Strategic Vision 2035' and seeks to rely on the end to end transport demand modelling carried out in the route assessment, it has not taken into account the local traffic vagaries that would be identified had any micro-simulation modelling been carried out on the Glen Ellan Distributor Road.

At present during peak traffic there is bottle necking of traffic seeking to exit the Castleview/ Bunbury Gate and Brides Glen estates at peak times. This is in particular due to vehicles dropping off children up to Swords Educate Together and Gaelscoil Brian Bóroimhe. This will not be reduced by the BRT as the school traffic is internal traffic movements within the Swords area as opposed to the traffic corridor being served by the BRT. As such with the addition of buses at 4 minute frequencies this will only add to the inability of people trying to exit their estates which in turn will create safety hazards as frustrated drivers seek to speed through gaps in the traffic across 2 lanes of traffic.

Added to this is the increased road safety issue which would have been identified had a Stage F road safety audit been carried out as the site lines at the estate entranceways are proposed to be substantially reduced due to the increased carriageway width and the proposal to replace the existing footpath/ verge/ segregated cycletrack (circa 5m) with a 2m footpath.

Removal of the Skate Park, Balheary Park

The current proposal requires the complete removal of the existing Skate Park, which is used by large numbers of children and teens from the area. It took many years of work to get this valuable recreational amenity built and its removal will have a devastating impact on the younger and voiceless members of our community.

Finally, in response to the economic appraisal carried out as part of this route assessment and in particular the emphasis in the reliability of the journey time in promotion of the BRT. It is of note that while the BRT may replace and improve upon existing public buses, there already exists a private express bus service, serving the Glen Ellan distributor road which provides sufficient frequency and reduced travel times in comparison to the public bus service. As such there could be no appreciable cost benefit in spending money on a service to double up and compete with that already in place.

Whereas should the final section of the BRT follow that proposed within the Oldtown – Mooretown Local Area Plan and the report, 'Your Swords, An Emerging City, Strategic Vision 2035' it would complement the existing transport provisions to the Swords Area, improving the service to a catchment area not already served by a reliable express service and it may make economic sense.

Joe White

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 24 November 2014 21:07
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
totally against with the swiftway, it will cause damage to swords express

--
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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 25 November 2014 10:45
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
Hi,

I would lie to drop some comments based on the information and understanding that I have at the moment. It seems like Swords Express is already serving for those people that commute to town with a much more convenient and direct route and an excellent service. For those that for example study at dcu, it looks like the route will be very similar to existing 41/41c route. Therefore, there is no justification for investment of tax payers money.

This type of investment would only be justifiable for metro/luas/train commute and does not make sense to create another bus route (that will not even go via Boroimhe for example).

Hope these comments will be taken into consideration

Regards,
Anna

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[redacted]

From: WordPress <forms@ntawebsite.ie>
Sent: 28 November 2014 13:03
To: Conor McGrath; david.king@nationaltransport.ie; frances.murphy@nationaltransport.ie; eoin.ocathain@rod.ie; Eddie Feely; Cormac.Ross@nationaltransport.ie; consultation@nationaltransport.ie
Subject: Bus Rapid Transit Public Consultation

[redacted]

Comments:
The route through brides glen which goes past the schools is dangerous and disruptive for the children attending both schools on the route.The current road layout barely allows for 2 cars to pass each other. There is no parking available for safe school pick up as it is and this would make things worse.There are many safer route a for this service to take.

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Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Notes:

Concerned re:

- loss of trees outside house
- conflict with cyclist at revised green area at Collins Ave junction.
- Registered Blind - needs ~~to stop~~ lighting or some measures to stop cyclists colliding with pedestrians.

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Comments:

Concern raised re feasibility of Rail / Bus would be a far better system.

[redacted]

There is concern that some businesses and property owners will be issued with CPO's in respect of spaces outside the front doors of their buildings, so as existing footpaths can then be converted into roadway. Property owners in Dublin North Central will resist any such moves.

[redacted]

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Notes:

- Use of median - can Swords Express happen.
- Route Option - Jugback Lane - closed to traffic
- Bus Route - running up Jugback - ~~not~~ - junction not closed.
- Indented bus stops - length - 24m?
  - Concerned that not long enough.
- Are Swords express being
  - Bulbuggin express
  - Pontoon
- Swords Express - 98 departures a day - one 10/15 minutes.
- Confirm that we are not Rationalising private bus services
- 20 buses on the services - no Consultation with Swords Express
- Why is an 8-9am model being used as opposed to 7-10am
- Total ~~am~~ boardings 7-10am in Swords 15,000

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Comments:

I STRONGLY OBJECT TO ANY PROPOSED ENTRANCE THROUGH THE BOUNDARY WALL OF CARLTON COURT.

(A) IT WOULD ENCOURAGE MORE ON STREET PARKING IN CARLTON COURT BY NON RESIDENTS

(B) IT WOULD ENCOURAGE LATE NIGHT PEDESTRIAN TRAFFIC THROUGH CARLTON COURT ENCOURAGING NOISE AND ANTI SOCIAL BEHAVIOUR.

[redacted]

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

Enquirers Contact Details:

[redacted]

Comments:

I have major concerns regarding the bus route @ the Educate Together School & Gaelscoil. There is a large volume of traffic along this route @ peak school times & many parents park along this road @ these times, particularly in wet weather. There is a major traffic management issue to be addressed.

Additionally there is a health & safety issue for the children walking to school when you combine this bus & its attendant commuter traffic & the school traffic.

The route & re-design of streetscape up to Applewood is an improvement however I believe that the terminus needs to relocated. I object to its current location unless traffic mgmt & parking issues are satisfactorily addressed.

[redacted]

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Notes:

- Access at no 101-111 (approx) - safe access to driveways with proposed narrowing of footpath.
- Collins Ave Junction:
  - neighbourhood replaced aesthetically.
  - existing wall (east side) north of Everglade Rd. - existing wall & trees reinstated to existing or better.

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Comments:

wall @ Whitehall Colmcille - Swords Road
to be retained or replaced to match existing
Existing planting - if replaced to be replace with semi native local
Trees in car park to be replaced if removed with semi native local.
Why was issue of junction left turn raised at last
public consultation?
A section on southside scheme should be mirrored
on this Northside Scheme
Concerns / Objection to reduction of footpath width
safety of parking cars whilst looking gate where
leaving property.

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre
Public Consultation

[redacted]

Comments:

The ban on a right hand turn from the Swords Road into Iveragh Road means that all traffic from the North wishing to access Gaeltacht Park will have to turn right on to Collins Avenue and then left into either of the current access points to Gaeltacht Park. These are very narrow quiet roads. This increased traffic will increase congestion in this part of Gaeltacht Pk (and Collins Ave) thereby reducing the resident's amenity.

Has there been a traffic survey conducted to measure the impact this may have?

It is already difficult to turn right from the Swords Rd. to Collins Ave so this measure will lead to further tailbacks on the M1.

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Notes:

10th House down from Santry Close (southbound).
Concerned about the loss of the green patch outside this garden wall.

Swiftway
Bus Rapid Transit

Swords/Airport to City Centre Public Consultation

[redacted]

Comments:

Junction of Collins Ave (west) turning left onto Swords Road - Toll back
Residents Old Swords Road turning left onto Collins Ave
Against
Access to houses
Concerned about trees
Reinforced concrete wall - must be retained
Plant + trees to be retained where possible
Existing left turn traffic is causing safety issues at junction
Noise dust + vibration concerns
Night working - experiences from Dublin Port Tunnel not favourable