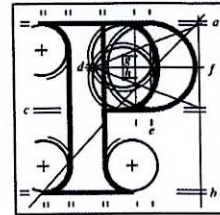


Our Case Number: ABP-313892-22



An
Bord
Pleanála

OCR/Cabra Drive Residents Committee
c/o Eamon O'Ceallaigh
104 Old Cabra Road
Dublin 7

Date: 21 July 2023

Re: Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

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

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

AA02

Teil	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

OCR & Cabra Drive Residents Committee
104 Old Cabra Road
Dublin 7

11 July 2023

FAO The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
11 JUL 2023	
Fee: €	_____ Type: _____
Time: _____	By: <u>Mand</u>

Re: Response to Applicant Submission

ABP Reg. Ref: KA29N.313961
Applicant: National Transport Authority
For: Blanchardstown Bus Corridor

Who are we?

This response has been prepared by a number of representatives of the Old Cabra Road and Cabra Drive (names below) who live adjacent to the proposed Blanchardstown to Ellis Quay Bus corridor

Preamble:

We support in general the concept of bus priority, the objectives of the Bus Corridor scheme and appreciate that the scheme will bring benefits to the citizens of our city and the environment.

Notwithstanding this, we have serious concerns regarding the potential for prohibitively restrictive local access arrangements for the Old Cabra Road residents.

We have reviewed the Applicant's response to all submission received on the proposal, and our concerns relating to local access arrangement to our properties have not been alleviated.

We request that An Bord Pleanala (ABP) take into consideration the importance of unrestricted local access to residential properties along the Old Cabra Road when considering the subject proposal and the knock on impacts diverted traffic will have on the surrounding road networks, namely Glenbeigh Road.

1. RESTRICTIVE TRAFFIC PROVISIONS FOR THE OLD CABRA ROAD

In our submission to ABP in August 2022, we requested the applicant to ease the punitive traffic restrictions on residents along the Old Cabra Road and Cabra Drive to allow the local residents to move freely for the length of the Old Cabra Road travelling in both northbound and southbound direction.

We requested either:

1. An additional Road Sign for 'Local Access Only'; or

2. An amendment to the exceptions as currently proposed on the 'No Straight Ahead'.

The red text indicates our requested amendment to the existing proposed signs set out by the NTA.

Type	Regulatory Sign	Sign Location
New Sign and/or Amendment to NTA Proposed Sign	'Local Access Only' (New Sign) 'No Straight Ahead' Except for public service vehicles, bicycles and access. (Amendment)	Old Cabra Road (north entrance from Navan Road)
New Sign and/or Amendment to NTA Proposed Sign	Local Access Only' (New Sign) 'No Straight Ahead' Except for public service vehicles, bicycles and access. (Amendment)	Old Cabra Road (travelling northbound) at railway bridge.

Table 1.1: Alternative Signs to Allow Unrestricted Local Access

The Applicant's response states "With respect to the proposed alternative measure of addition of "local access" text to the "No Straight Ahead" sign, it is not currently possible to facilitate access for local residents only by private vehicle as the current regulations is based on restricting classes of vehicles"

It should be noted that we had not requested that "local access" be added to the 'No Straight Ahead' sign, rather the request was for the addition of 'and access' to the No Straight Ahead sign.

We would like to re-iterate that the addition of 'Access' as an exemption is in line with The Department of Transport, Tourism and Sport document on 'Regulatory Signs' (Chapter 5, 2019), which provides details of the regulatory signs which may be used on roads in Ireland, including their layouts and symbols, the circumstances in which each sign may be used and guidance on positioning them.

Section 5.9.4 of this Government Document sets out details on the 'No Straight Ahead Sign, RUS 011' which indicates that traffic is restricted from proceeding in the direction indicated. This sign shall only be used in conjunction with Supplementary Plate P 050 detailing exceptions to the restriction or Plate P 051 describing the periods during which the restriction applies.

The list of permitted exceptions is given in Table 5.14 of the Document and is set out below. It is noted that 'Access' is a permitted exemption.

English	Irish
EXCEPT BUSES	Ach Amháin Busanna
EXCEPT BUSES AND BICYCLES	Ach Amháin Busanna agus Rothaithe
EXCEPT BUSES AND TAXIS	Amháin Busanna agus Tacsaithe
EXCEPT BUSES, TAXIS AND BICYCLES	Ach Amháin Busanna, Tacsaithe agus Rothaithe
EXCEPT BUSES AND TRAMS	Ach Amháin Busanna agus Tramanna
EXCEPT BUSES, TRAMS AND BICYCLES	Ach Amháin Busanna Tramanna agus Rothaithe
EXCEPT BICYCLES	Ach Amháin Rothaithe

EXCEPT TRAMS	Ach Amháin Tramanna
EXCEPT TRAMS AND FOR ACCESS	Ach Amháin Tramanna agus Rochtain
EXCEPT FOR ACCESS	Ach Amháin Rochtain
EXCEPT AUTHORISED VEHICLES	Ach Amháin Feithiclí Údraithe
Other combinations of the above exceptions may be used	

If the applicant was not willing to provide this addition to the 'No Straight Ahead' sign, a separate sign for 'Local Access Only' should be considered. A 'Local Access Only' sign is already proposed along the Old Cabra Road traveling northbound past Cabra Drive.

2. TRAFFIC IMPACTS ASSOCIATED WITH THE RESTRICTIONS

The applicant has claimed that the Proposed Scheme will result in a reduction of traffic flows on Glenbeigh Road during AM peak hour and PM peak hours. The calculated traffic flow reduction was set out in Table 6.64 and Table 6.69 of the Traffic and Transport Chapter. The results for Glenbeigh Road have been isolated and summarised below.

Road Links that Experience a Reduction of ≥ 100 Combined Flows during AM Peak Hour (Indirect Study Area)			
Road Name	Do Minimum Flows (PCUs)	Do Something Flows (PCUs)	Flow Difference (PCUs)
Glenbeigh Road	337	170	-167
Road Links that Experience a Reduction of ≥ 100 Combined Flows during PM Peak Hour (Indirect Study Area)			
Road Name	Do Minimum Flows (PCUs)	Do Something Flows (PCUs)	Flow Difference (PCUs)
Glenbeigh Road	304	142	-162

We respectfully submit that this is unlikely to be the case, and rather the level of traffic on Glenbeigh will be increased as a result of the Bus Gates and restrictive access on the Old Cabra Road. This view is based on the following:

- a) Residential access to the north-western section of Old Cabra Road by car and other vehicles will be available via Glenbeigh Road, therefore increasing traffic levels.
- b) Residential access to the southern section of the Old Cabra Road for those travelling southbound on the Navan Road are likely to use Glenbeigh Road, therefore increasing traffic levels.
- c) Access to the 'Go Station' located on the north-western section of the Old Cabra Road by and other vehicles will only be available via Glenbeigh Road, therefore increasing traffic levels.

In relation to point (c) above, it is our view that the traffic associated with the 'Go Station' has not been taken into consideration in the assessment. The EIAR states that traffic surveys undertaken to inform the assessments of the EIAR were undertaken in November 2019 and February 2020. However, the 'Go Station' only became operational in July 2022. Therefore, we respectfully submit that there is a significant lacunae in the EIAR, and the traffic impacts on Glenbeigh Road have been underestimated.

3. CONCLUSION

We fully acknowledge and welcome the need to improve accessibility for our city. In this regard, the NTAs investment in sustainable transport to improve the urban environment is welcome, however, we would request that the importance of the local need for access associated with the dwellings on the Old Cabra Road and Cabra Drive be recognised.

We respectfully request that An Bord Pleanála:

1. Request Further Information from the NTA that would provide for plans and particulars to allow for local access for the length of the Old Cabra Road in both northbound and southbound direction; or
2. In the event of granting planning permission for the proposed development, stipulate a condition that provides for unrestricted local access for the length of the Old Cabra Road in both northbound and southbound direction.

We would be grateful if you could acknowledge receipt of this observation.

Yours sincerely,



Eamon O'Ceallaigh



Trista Vincent



Robert Nolan



Killian Unger