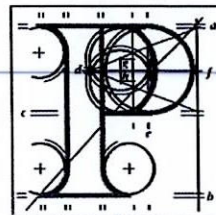


**Our Case Number:** ABP-313509-22

**Your Reference:** Aviva Life & Pensions Ireland DAC



**An  
Bord  
Pleanála**

Virtus  
5th Floor  
The Glass House  
11 Coke Lane  
Smithfield  
Dublin 7  
D07 WNP2

**Date:** 22th July 2022

**Re:** BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme  
Co. Dublin

Dear Sir / Madam,

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

A receipt for the fee lodged is enclosed.

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

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

|                           |                |  |
|---------------------------|----------------|--|
| <b>Tel</b>                | <b>Tel</b>     | (01) 858 8100  |
| <b>Glaó Áitiúil</b>       | <b>LoCall</b>  | 1890 275 175   |
| <b>Facs</b>               | <b>Fax</b>     | (01) 872 2684  |
| <b>Láithreán Gréasáin</b> | <b>Website</b> | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| <b>Ríomhphost</b>         | <b>Email</b>   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

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

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

Yours faithfully,



Sarah Caulfield  
Executive Officer  
Direct Line: 01-873 7287

HA02A

|                    |         |  |
|--------------------|---------|--|
| Teil               | Tel     | (01) 858 8100  |
| Glao Áitiúil       | LoCall  | 1890 275 175   |
| Facs               | Fax     | (01) 872 2684  |
| Láithreán Gréasáin | Website | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| Ríomhphost         | Email   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

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V94 V2VW



The Secretary  
An Bord Pleanála (Strategic Infrastructure Division)  
64 Marlborough Street  
Dublin 1  
D01 V902

|                         |           |
|-------------------------|-----------|
| <b>AN BORD PLEANÁLA</b> |           |
| LDG-                    | 055130-22 |
| ABP-                    | 313509-22 |
| 11 JUL 2022             |           |
| Fee: €                  | 50.00     |
| Type:                   |           |
| Time:                   |           |
| By:                     | AAWD.     |

11<sup>th</sup> July 2022

**RE: OBSERVATION TO AN BORD PLEANÁLA ON THE BELFIELD / BLACKROCK TO CITY CENTRE CORE BUS CORRIDOR SCHEME COMPULSORY PURCHASE ORDER 2022 – NOTICE OF RESTRICTION OF OR INTERFERENACE WITH EXISTING PUBLIC RIGHT OF WAY ON GEORGE'S AVENUE, COUNTY DUBLIN AND THE BUSCONNECTS DUBLIN CORE BUS CORRIDORS INFRASTRUCTURE WORKS ON FRASCATI ROAD, COUNTY DUBLIN**

**AN BORD PLEANÁLA REFERENCE – ABP-313509/23**

Dear Sir/Madam,

On behalf of Aviva Life & Pensions Ireland DAC, Building 12, Cherrywood Business Park, Bray Road, Loughlinstown, County Dublin D18 W2P5, we wish to make an observation on the above scheme. We understand all rights of way of vehicular traffic (except pedal cycles or other bicycles, emergency vehicles, maintenance vehicles, refuse vehicles) over that section of the public right of way on George's Avenue, Blackrock, County of Dublin and between the lines BA1 and BA2, shown coloured green on the deposit map reference 1415-DM-0001, are to be restricted or otherwise interfered.

We do not object to these proposed works and welcome the new right of way from George's Avenue to Frascati Road, as proposed in the Belfield / Blackrock to City Centre Core Bus Corridor Scheme ('Subject Scheme').

We note the proposed Bus Connects Dublin Core Bus Corridors Infrastructure Works along Frascati Road, Blackrock, County Dublin, and to its junctions, in particular with Rock Hill Road. We are not adversely against the subject scheme, illustrated in drawing no. BCIDC-ARP-GEO\_GA-1415\_XX\_00-DR-CR-0003, Rev. M01, however our transport consultant advisor (MHL) has assessed the scheme and make some suggested amendments that would improve the junction between Frascati Road and Rock Hill Road and access to the Blackrock Village



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Centre (owned and operated by Aviva) and the neighbouring Frascati Shopping Centre on the opposite side of Frascati Road (west of the Blackrock Village Centre).

In short, it is proposed that the flow of traffic entering Rock Hill Road from Frascati Road should be reversed, to the previous route (main entry from the south east and main exit to the north west). This will improve traffic flow at this traffic signalised junction and will give customers, visiting from the south west, easier access to Rock Hill Road and to park at the Blackrock Village Centre and Blackrock Village and visit these centre's, and the Frascati Shopping Centre, from these car parking areas. Please refer to MHL's Technical Report in Appendix 1 for full assessment.

Aviva has significant concerns that the subject scheme will have severe impacts on the business activity to the Blackrock Village Centre through the restricted access point for customers arriving to the Frascati Road and Rock Hill Road junction from the south. Aviva are also concerned that the proposed works will cause major delays and nuisance to drivers using Frascati Road and accessing the Blackrock Village Centre and the Village and the Frascati Shopping Centre, while the upgrades works to Frascati Road are taking place.

The Blackrock Village Centre (Formerly the Blackrock Shopping Centre) and its retailers have suffered immensely from transport upgrades to both Frascati Road (cycle lane scheme, developed between 2017-2018) and the Rock Hill Road, Main Street and Temple Road traffic lane reversal scheme and upgrades. The Frascati Road cycle lane scheme caused traffic delays and closure of the road for a prolonged period and at various times of the day throughout the week, while the cycle lanes were being constructed. The traffic management plan was not implemented and there was poor co-ordination between the developers and utility providers, throughout the development of the scheme, which led to an extension to the programme and further disruption to traffic using Frascati Road. Members of the public were forced to avoid this part of Frascati Road during this time. This cannot happen again, as the disruption in traffic movement on Frascati Road and Rock Hill Road brought a loss of 50%, plus, to the retailers in the then Blackrock Shopping Centre, including the anchor tenant SuperValue. Some of the retailers in the then Blackrock Shopping Centre were on the brink of closing down following a continued loss in revenue.

Aviva are not anti the proposed BusConnects scheme on Frascati Road and are in support of it and the increase in more sustainable modes of transport in this urban and populated area. Nonetheless, customers, service providers and staff will need to access Blackrock Village Centre and Blackrock Village using motor and battery vehicles. The rerouted traffic lane system from Frascati Road to Rock Hill Road and into Blackrock Village, that was constructed in 2020, has significantly reduced customers visiting the Blackrock Village Centre and



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Blackrock Village. The Blackrock Village Centre is dependent on custom from the areas to the south east of Blackrock. Customers from these areas have reported that the existing right turn to Rock Hill Road, from Frascati Road, through the slip lane, is nearly impossible to use when traffic volumes are high on Frascati Road. Customers are therefore forced to bypass the Blackrock Village Centre and Blackrock Village. Changing the traffic lane system in Rock Hill Road and Blackrock Village to the opposite previous arrangement (access from south east, exit at north west), would allow easier access for customers from the south east where the core custom to the Blackrock Village Centre originates. Traffic pressure through this reinstated road arrangement in Blackrock Village would alleviate traffic pressure on the N31. Aviva were unable to comment on the Rock Hill Road and Blackrock Village road upgrade scheme as it is a temporary works scheme and no public consultation was available.

We welcome the cycle lane provision in Rock Hill Road and the ambition to create a more sustainable transport environment in Blackrock, but this cannot be at the expense of the motor and battery vehicle entering and exiting Blackrock Village easily. Customers will continue to drive to Blackrock Village Centre and Blackrock Village for their shopping and service needs, for the foreseeable future.

To avoid the disruptions experienced during the Frascati Road bicycle scheme, the Blackrock Village Centre request that the agreed and implemented construction programme for the proposed BusConnect Scheme on Frascati Road is followed / achieved. The full programme and schedule of works needs to be shared and the scheme's traffic management plan should be managed and executed properly. The least disruption to the Blackrock Village Centre and Blackrock Village should be maintained throughout the construction of the Frascati Road BusConnects scheme.

We trust the concerns raised in this observation are clear and that the suggestions we have made are acted upon and followed in the proposed Frascati Road BusConnects scheme.

Yours faithfully,

---

**Gerald Hegarty MRTPI MIPI**  
**Senior Consultant**

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**Virtus**

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**APPENDIX 1 –****TECHNICAL NOTE BY MHL ON THE BUSCONNECTS DUBLIN, CORE BUS CORRIDORS  
INFRASTRUCTURE WORKS**



## TECHNICAL NOTE

|                        |   |
|------------------------|---|
| MHL Project Number:    | 22092TR   |
| Project Title:         | BusConnects Dublin, Core Bus Corridors Infrastructure Works             |
| Author:                | Ken Manley BE CEng  |
| Date:                  | 30/06/2022  |
| Subject:               | Blackrock Village Centre - Section 38 Submission to Dublin City Council |
| MHL Document Reference | 22092TR – Doc01   |



### Introduction

MHL Consulting Engineers have been engaged by Aviva DAC, who are the operators of the Blackrock Village Centre Retail Park (BVC), to address their concerns in relation to the proposed 'BusConnects Dublin, Core Bus Corridors Infrastructure Works' and in particular the Belfield / Blackrock to City Centre Core Bus Corridors Scheme.

The Blackrock Village Centre includes the following retail provision:

| SuperValu<br>Blackrock       |                                     |                           |                    |
|------------------------------|-------------------------------------|---------------------------|--------------------|
| an<br>post                   | Art & Hobby                         | Bewley's                  | Boston Barber Shop |
| b<br>BOWEN'S BEAUTY<br>SALON | Butlers<br>chocolate life           | Crilly<br>Shoe<br>Repairs | DIFFNEY            |
| Dubray                       | ESSENTIAL DRY CLEANERS              | fix<br>it                 | FUJIFILM           |
| hair<br>creations            | Holland Barrett                     | THE<br>HOMECARE<br>CENTRE | Julia Rosini       |
| L'Occitane<br>en Provence    | LISA PERKINS                        | Lloyds Pharmacy           | No Nod             |
| ONYX                         | Scrubbles<br>Landscape<br>Landscape | SuperValu<br>Blackrock    | V                  |





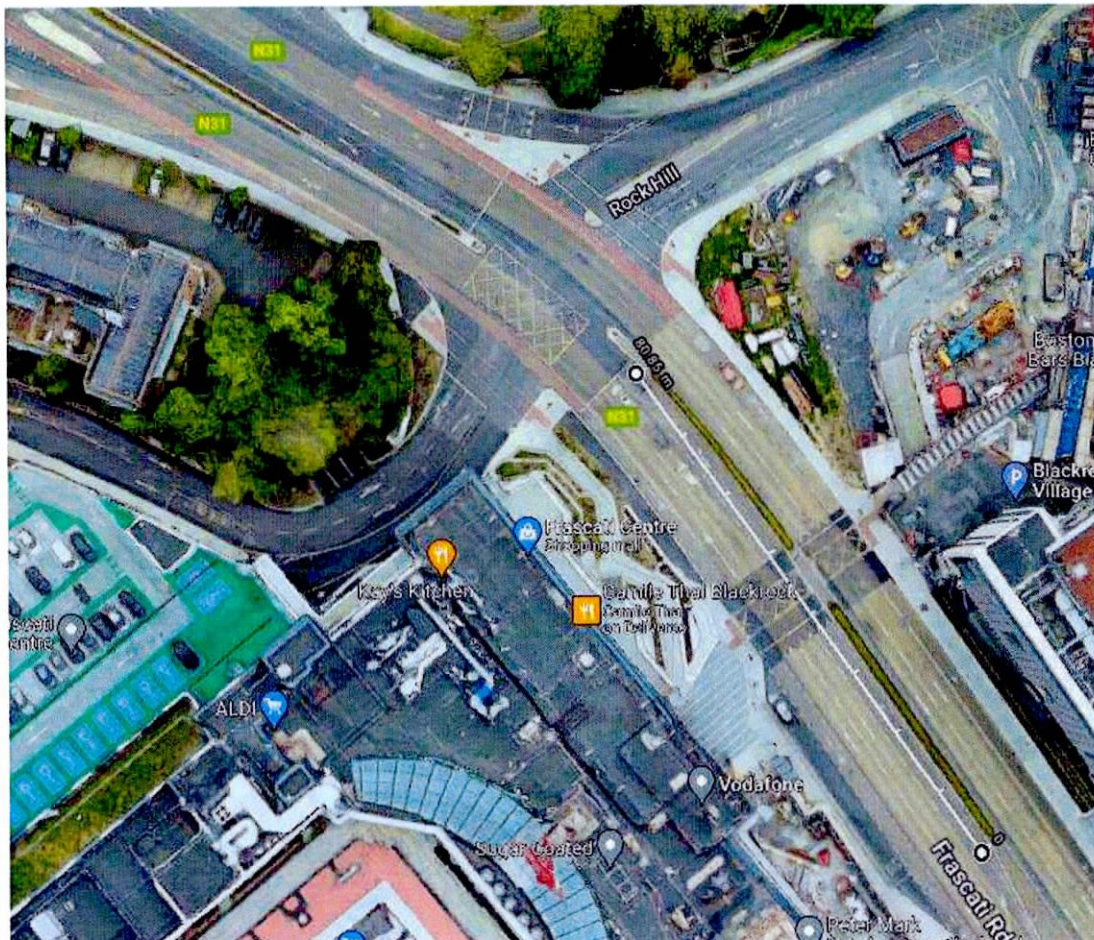


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Centre (and the Blackrock Centre entrance) removes a volume of traffic from the junction implying more storage for through traffic heading east and hence more capacity at the junction.



**Figure 2: Existing Junction (2022)**

The current roads arrangement facilitates access to the Blackrock Village Centre with adequate capacity during peak periods. Patrons wishing to access both the Blackrock Village Centre and the Frascati Centre opposite coming from the east are required to use the N31 at present. This is due to the eastbound one-way system implemented on Rock Hill and Main Street during the Covid Pandemic. The current BusConnects scheme does not extend to encompass this section of Rock Hill / Main-Street so it is assumed that this intervention will be maintained.

The PM peak period (17:00-19:00) would be the critical time-period for the BVC as it would coincide with peak background flows on the N31.



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**Traffic Generation from the Centre**

The operators of the Centre have provided the following information on traffic generation to the BVC based on recorded vehicular movements entering the car park over a 24-hour period (*data provided is for May 2022*).

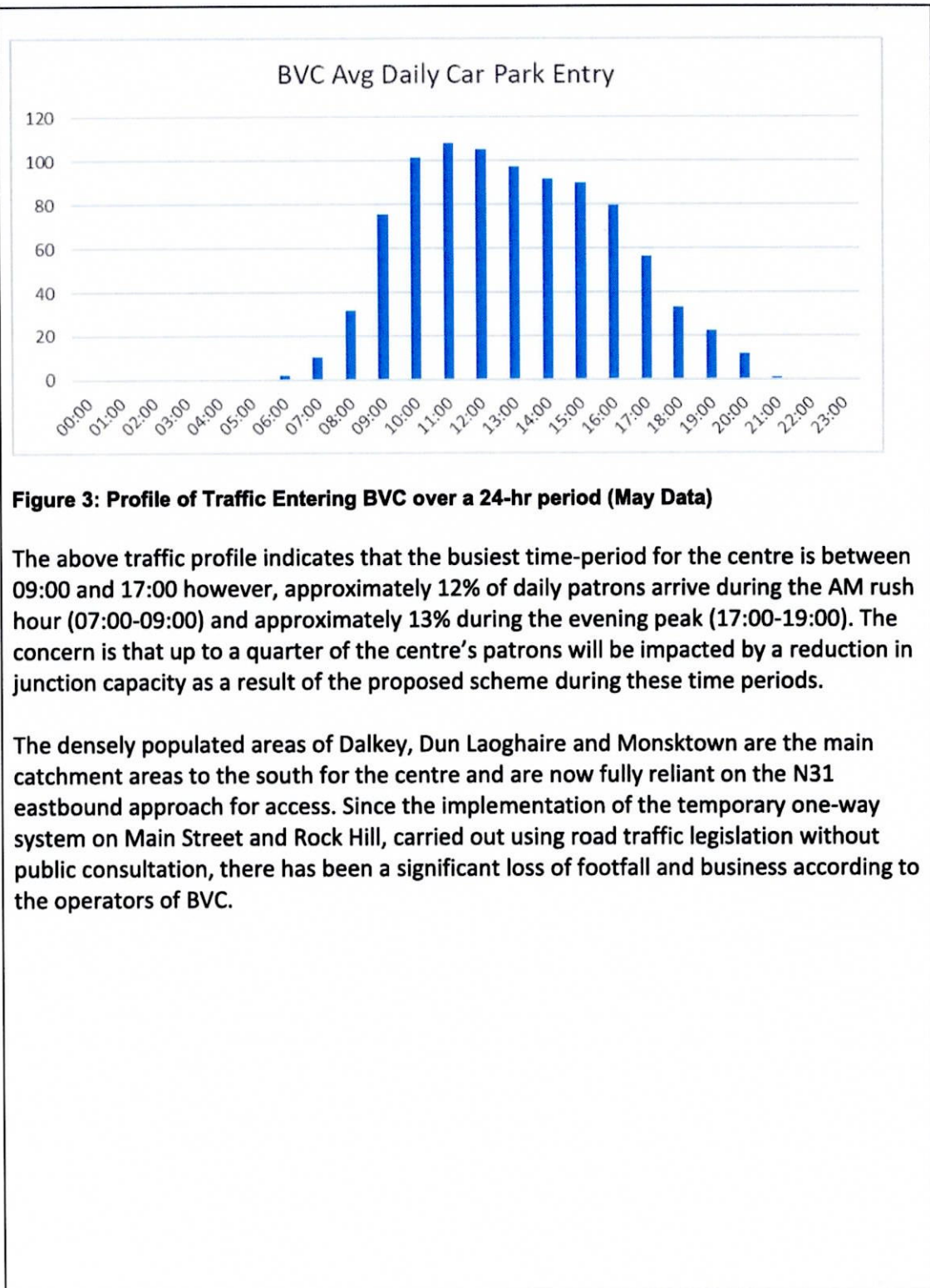
| Daily Avg. | Total Entries | Daily %        |
|------------|---------------|----------------|
| 00:00      | 0             | 0.00%          |
| 01:00      | 0             | 0.00%          |
| 02:00      | 0             | 0.00%          |
| 03:00      | 0             | 0.02%          |
| 04:00      | 0             | 0.02%          |
| 05:00      | 0             | 0.03%          |
| 06:00      | 2             | 0.18%          |
| 07:00      | 10            | 1.13%          |
| 08:00      | 31            | 3.43%          |
| 09:00      | 76            | 8.24%          |
| 10:00      | 101           | 11.06%         |
| 11:00      | 108           | 11.78%         |
| 12:00      | 105           | 11.46%         |
| 13:00      | 97            | 10.59%         |
| 14:00      | 92            | 10.03%         |
| 15:00      | 90            | 9.82%          |
| 16:00      | 80            | 8.70%          |
| 17:00      | 56            | 6.13%          |
| 18:00      | 33            | 3.59%          |
| 19:00      | 22            | 2.43%          |
| 20:00      | 12            | 1.27%          |
| 21:00      | 1             | 0.08%          |
| 22:00      | 0             | 0.00%          |
| 23:00      | 0             | 0.01%          |
|            | <b>916</b>    | <b>100.00%</b> |

**Table 1: Daily Average – Car Parking Entry Data (May 2022)**

The data shows that 98.39% of traffic (902 vehs) enter the site between 07:00-19:00 using the existing Frascati Road/ Rock Hill junction. The peak hour flows shown are 'in-only' so the recorded figures could be doubled to represent the BVC traffic impacting on the N31 junction. Added to this are background N31 traffic flows (including Frascati Centre traffic) to determine the full operational demand on the signalised junction at peak periods (07:00-09:00 & 17:00-19:00).

# TECHNICAL NOTE

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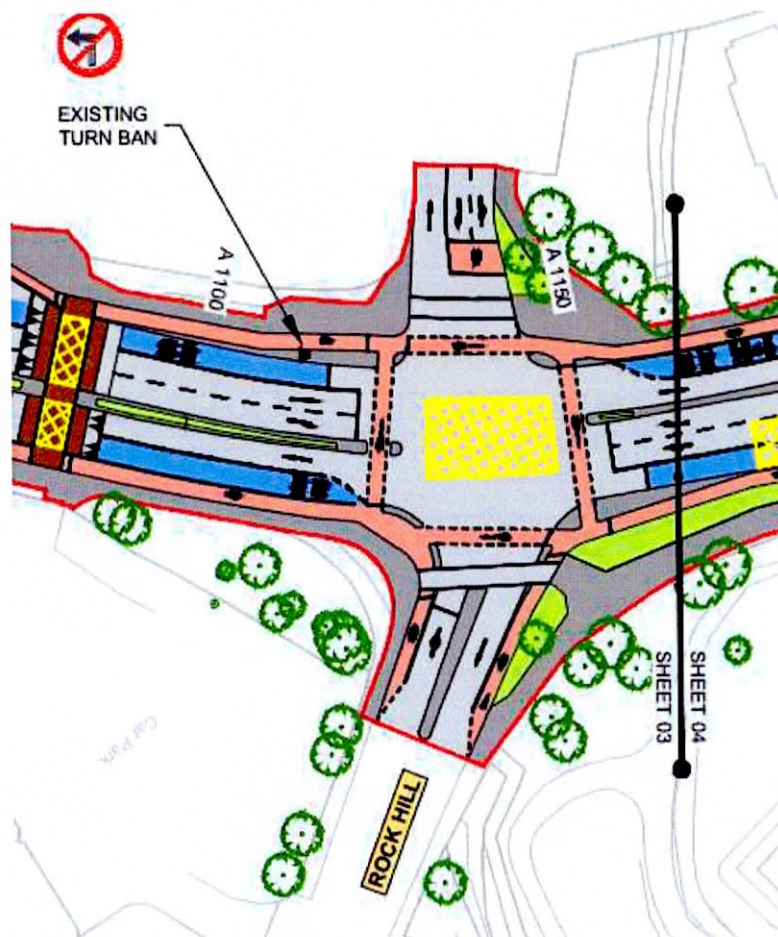
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## Proposed Roads Scheme

The proposed works at the junction are shown in the following figure and include provision for cycle crossings at the Rock Hill / Frascati Road junction as well as dedicated bus lanes on Frascati Road. The proposed arrangement results in a reduction to one-lane for east/west and west/east traffic flows. The slip-lane on the western approach has also been removed requiring left turning traffic to queue with straight ahead traffic at the signals.



**Figure 4: Proposed BusConnects Scheme on Frascati Road**

A review of the traffic modelling report accompanying the scheme indicates that the capacity of the junction will reduce significantly for vehicular traffic because of the loss of lanes as well as an increase in cycle time to accommodate cycle crossings of Frascati Road. The expectation is that this will be mitigated against through an increase in modal shift (primarily public transport usage) and a resultant reduction in private car usage.

Our client is concerned that given the nature of both the Blackrock Village Centre and



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the Frascati Centre opposite as retail offerings, it is unlikely that a large increase in modal shift towards public transport will occur amongst their patrons. While remaining reliant on the N31 as the only means of vehicular access there is a serious concern that patrons will be stuck in queues of traffic during peak traffic periods heading west along Frascati Road, unable to reach the right turn lane to enter the BVC. Patrons will be attracted to alternative destinations that are easier to access and the resultant loss in custom could be economically catastrophic for businesses already under pressure.

Our client urges the City Council/NTA and designers of the scheme to consider reversing the one-way traffic flow through the Village which would provide an alternative route for traffic to access both the BVC and the Frascati Centre opposite. This would reduce traffic flow on the N31 as well as providing patrons the opportunity to use on-street parking or the BVC parking or the Frascati Centre parking based on availability.

### Conclusion

It is our opinion that the Blackrock Village Centre has very significant and well-founded concerns in relation to the impact of the proposed BusConnects scheme on their businesses. While the client realises the importance of active travel schemes such as this one and the associated benefits for the community, they believe the proposed design will have a number of significant negative impacts on their businesses and the surrounding area. The main arguments expressed by our clients are as follows:

- The proposed road scheme will result in the removal of significant junction capacity at the only access point to the BVC (as a result of the current one-way system operating on Main Street/Rock Hill).
- The one-way system through the Village Centre as currently in place will severely restrict access from the south and east with the potential for a significant loss of patrons.
- Consideration should be given to reversing the one-way flow of traffic on Main Street and Rock Road which better reflects historic desire lines allowing circulating traffic the option of parking in various locations. This could be further assisted through the provision of real-time parking availability signage.
- There is a concern that the construction stage of this scheme will extend over a long time-period further eroding patrons association with the BVC. To prevent this our client asks that careful consideration is given to the traffic management plan associated with the construction stage and every effort is taken to reduce the impact on the Centre's operation.