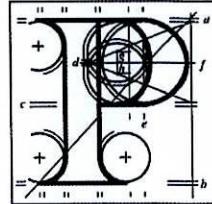


Our Case Number: ABP-316828-23

Your Reference: Maxol Limited



**An
Bord
Pleanála**

RW Nolan & Associates
Basement Office
54 Fitzwilliam Square North
Dublin 2

Date: 20 July 2023

Re: Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.
Tallaght/Clondalkin to Dublin City.

Dear Sir / Madam,

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

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

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

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

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA03

Tel	Tel	(01) 858 8100
Glaó 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



An Bord Pleanála

SID Online Observation

Online Reference
SID-OBS-000938

Online Observation Details

Contact Name
Robert Nowlan

Lodgement Date
03/07/2023 13:11:42

Case Number / Description
Busconnects Tallaght/
Clondalkin Scheme

Payment Details

Payment Method
Online Payment

Cardholder Name
Robert Nowlan

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€ 50

Lodgement No

LDG-065177-23

Reason for Refund

On CPO schedule

Documents Returned to Observer

Yes No

Request Emailed to Senior Executive Officer for Approval

Yes No

Signed

Robert Nowlan
EO

Date

19/7/23.

Finance Section

Payment Reference

ch_3NPIbWB1CW0EN5FC088bhtrY

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

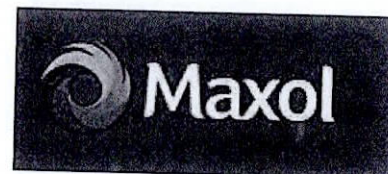
PROJECT NO: 92.01/2023



Submission on the proposed
Tallaght/Clondalkin to City Centre Core Bus
Corridor Scheme

JULY 2023

ON BEHALF OF:



RW Nowlan & Associates | Basement Office, 54 Fitzwilliam Square North, Dublin 2 D02X308 |
Company Reg. No. 565476 Director - Robert Nowlan | Tel: +353 01-8733627 |

1.0 INTRODUCTION

1.1 This submission has been prepared in response to the invitation by the National Transport Authority to make submissions or observations on the proposed 'Tallaght/Clondalkin to City Centre Core Bus Corridor Scheme'. The Scheme forms part of the Bus Connects project for the city. This submission is specifically related to the section 6 of the Scheme: the junction between the Long Mile Road (R110), the Naas Road (R810) and the New Nangor Road (R134). Drawing sheet no. 51 refers (Figure 2.0 below). The submission is made on behalf of Maxol Ltd.

2.0 GENERAL

2.1 The site of concern in this submission is that of a petrol filling station that is situated at the road junction between the Long Mile Road and the Naas Road. The petrol filling station has vehicular entrance and exit points along both road frontages. It is proposed to construct a pedestrian and cycle bridge across the complex junction. To facilitate access to this overbridge, four ramp structures are proposed adjacent to the road junction. One of these is a proposed curved ramp that is proposed to be constructed on lands that form part of the petrol filling station site. These lands currently do not form part of the petrol filling station itself and form a grassed area. However, they are immediately adjacent to underground fuel tanks. The ramp structure is one of four ramp structures to be built in order to facilitate the difference in level between the cycle lanes and the overbridge.

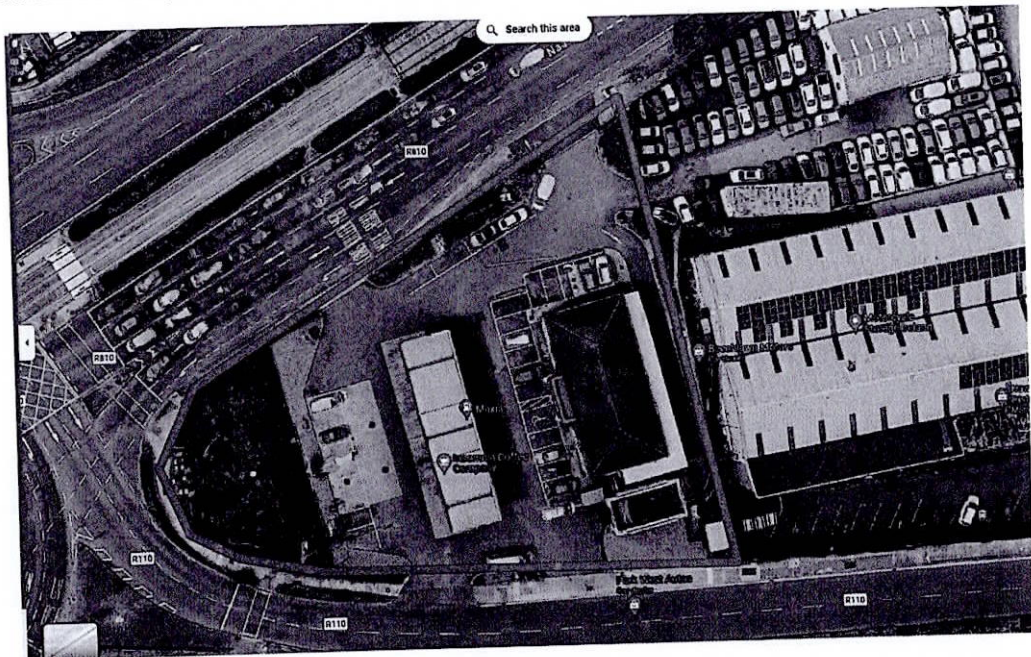


Figure 1.0 Google Map Location of Maxol Station

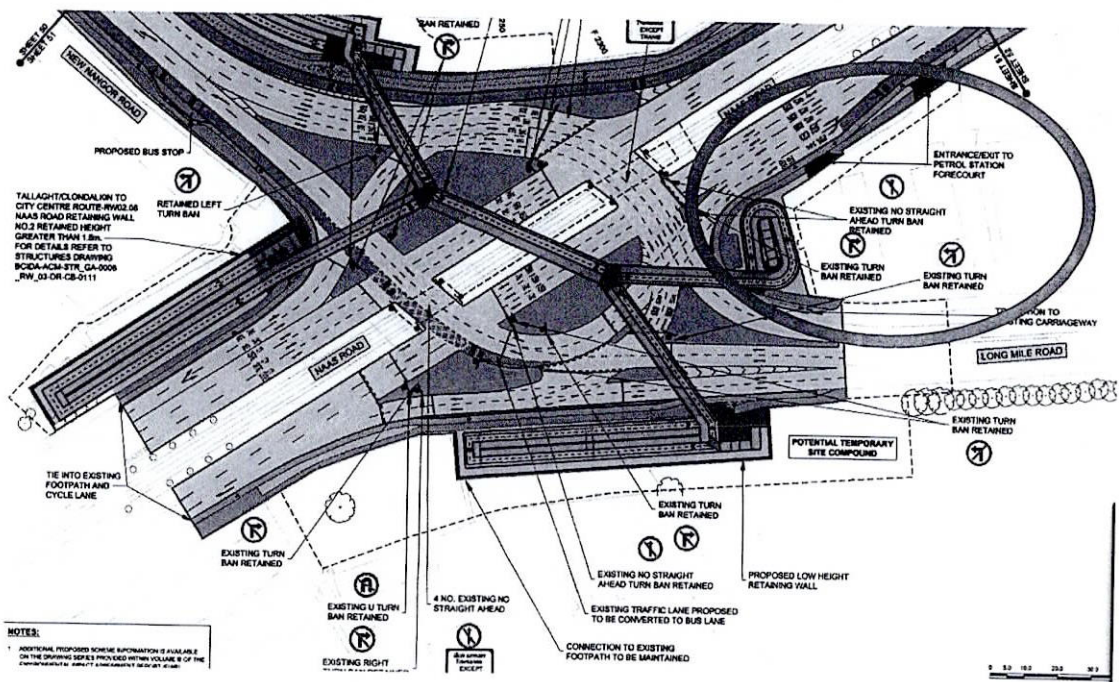


Figure 2.0- Showing Location of Proposed Bus Connects Works and Implications for the Maxol Station.

LEGEND:	
	BUS LANE
	CYCLE TRACK
	FOOTPATH
	CARRIAGEWAY
	GRASS AREA / VERGE
	PEDESTRIAN PRIORITY ZONE
	RAISED TABLE
	BUS STOP LOCATIONS
	BUS SHELTER
	TREE (EXISTING AND PROPOSED)
	HERITAGE FEATURES
	SITE BOUNDARY LINE
	TEMPORARY LAND ACQUISITION

3.0 NEED FOR A BICYCLE AND PEDESTRIAN OVERPASS STRUCTURE

3.1 The Non-Technical Summary states the following in relation to the proposed cycle way facilities along this section 6 of the proposed bus corridor scheme: *...“The Proposed Scheme is routed along the Naas Road (R810) until the junction with Walkinstown Avenue (R112), generally maintaining the existing lane provision of one bus lane and two traffic lanes in each direction with a proposed segregated two-way cycle track on the inbound direction and segregated one way cycle track on the outbound direction.”*¹

¹ Environmental Impact Assessment Report (EIAR), Non-Technical Summary, p. 21.

3.2 It should be noted that the proposed segregated two cycle track (inbound) and one way cycle track (outbound) would require cyclists to following the ramp structures resulting in a significantly longer distance plus need to cycle up the slope of the ramps. It is acknowledged that the existing cycle lanes do not provide continuous connection across the road junction. Such a continuous connection would be facilitated by the proposed overbridge but at a significant additional travel distance and travel effort for the cyclists (and pedestrians) following this overbridge option. In practice, it is unlikely that cyclists would follow this route and it is more likely they will prefer to follow existing routes along the road using crossing points at different locations around the road junction. These crossing points currently exist in the form of traffic light controlled pedestrian crossing that can be used by cyclists also.

4.0 VISUAL IMPACT AND OBSTRUCTION

4.1 The proposed curved ramp structure would result in a significant scale structure that would be right in front of the petrol filling station. The ramp structure would not only reduce the visibility of the petrol filling station but also detract from the visual amenity of the area. While the road junction is not a piece of visual beauty, it is an important traditional landmark in the city of Dublin and the petrol filling station forms a clear and distinctive visual landmark marking the well-known V-shaped junction between two important radial routes into the city.

5.0 HEALTH AND SAFETY ISSUES

5.1 The construction of the proposed curved ramped bicycle/pedestrian route requires the acquisition of lands that currently form part of the petrol filling station. The permanent take line is right up to the back of the existing petroleum vent stack, the Vapour recovery pipe and the Offset Fill delivery points. These elements are all classed as within the hazard zones and are subject to minimum dimensions from buildings, sources of ignition and public roads and footpaths. As the proposed cycle track and footpath bridge would be classed as public footpath in this situation, there are clear health and safety implications arising from the proximity of the proposed curved ramp structure to the petrol filling station infrastructure. Where currently a grassed area is provided to separate the footpath from the petrol filling station, this buffer would disappear.

5.2 In addition, there are concerns about the level of the proposed curved ramp in relation to the vent stack. Under regulations, the vent stack must be 4.5 m above the ground level under regulations.

The concern here is that a lighted flame or cigarette at that level would be a danger. These issues appear not to have been addressed in the Environmental Impact Assessment Report (TBC).

6.0 LAND TAKE ALONG NAAS ROAD FRONTAGE

6.1 It would seem that under the proposed scheme there are no changes proposed along the Naas road frontage of the existing petrol filling station. At the location of the petrol filling station, the outbound bus lane ends in the current layout, a single track cycle lane continues and the outbound road changes from two lanes plus bus lane to five lanes as part of the road interchange. This situation remains unchanged under the proposed plan (sheet 51 refers). Clarification is required whether any lands are required from the existing petrol station site to facilitate the proposed scheme along this road frontage.

5.0 CONCLUSION

- **The proposed pedestrian and cycle way overbridge with associated necessary ramp structures is ill advised as it creates a tortuous route for both cyclists and pedestrians to cross the road junction.**
- **The proposed pedestrian and cycle way overbridge with associated necessary ramp structures would create a visually overbearing structure that would exacerbate the visual scale and dominance of the existing road junction.**
- **The curved ramp structure that is proposed on the existing grassed area of the petrol filling station between the Naas Road and Long Mile Road would seriously injure the visual amenity of the area as it would block views of the petrol filling station that currently provides a landmark in the junction between the two radial routes into the city.**
- **Clarification is needed whether any land take along the Naas Road frontage of the petrol filling station is required having regard to the fact that the scheme does not propose any changes in the division of traffic lanes or the width of the existing road.**