

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

August 30, 2022

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

AN BORD PLEANÁLA	
LDG-	<u>056687-22</u>
ABP-	_____
30 AUG 2022	
Fee: €	<u>50</u> Type: <u>cash</u>
Time:	<u>1026</u> By: <u>hand</u>

Re: Objection to Application

ABP Reg. Ref: KA29N.313691
Applicant: National Transport Authority
For: Blanchardstown Bus Corridor

Who are we?

This submission 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.

The observation sets out:

- the ambiguous nature of the plans and particulars submitted by the NTA with respect to local access arrangement;
- Grounds of objection and;
- Suggested alternative.

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.

1. AMBIGUOUS LOCAL ACCESS ARRANGEMENTS

Proposals for residential access arrangements along the Old Cabra Road are extremely ambiguous. The supporting planning documentation and associated drawings for the proposed development are not consistent with regards to proposals for local access arrangements for the Old Cabra Road residents and appear to provide for two conflicting options, which are summarised below.

Option No. 1 - (Set out in Section 4.5.5.1 of the Environmental Impact Assessment Report and Associated Drawings)

There are excessive restrictions for local residential access for the Old Cabra Road set out in Section 4.5.5.1 of the Environmental Impact Assessment Report (EIAR), including:

- (i) local traffic will be prohibited to travel southbound on the northern portion of the Old Cabra Road (i.e. will not be able to access the Old Cabra Road from the Navan Road junction); and
- (ii) local access travelling northbound will only be allowed as far as the bus gate at the railway bridge.

These onerous restrictions are also reflected in the Traffic Signs and Road Marking Drawing No. BCIDC-ARP-TSM_GA-0005_XX_00-DR-CR-0028 [Sheet 28 of 40] and BCIDC-ARP-TSM_GA-0005_XX_00-DR-CR-0029 [Sheet 29 of 40].

Proposal No. 2 (Set out in Section 10.4.4.1.2.2)

Contrary to what is stated in the aforementioned sections, Section 10.4.4.1.2.2 indicates that only 'non residential access for private vehicles' will be prohibited on the Old Cabra Road (i.e. residential access for private vehicles will be permitted).

*"The bus gate between Navan Road and Old Cabra Road Junction and the overbridge on Old Cabra Road will reduce **non-residential access for private vehicles** between these two points, only permitting access to buses, emergency vehicles and taxis, with adjacent footpaths and cycle tracks facilitating movement for pedestrians and cyclists. However as local access would still be available access to community facilities from private vehicles will remain, albeit the route length and journey time may increase for those choosing to use private vehicles". (Our Emphasis Added)*

2. GROUNDS OF OBJECTION

We wish to object to the granting of the planning permission for the development as detailed in Section 4.5.5.1 of the EIAR and the associated drawings.

The current application before ABP has included some arrangements to support local access along the bus corridor route however these arrangements are far too restrictive on local residents.

Neither the bus gates nor this level of restrictive access formed part of the original consultation.

The reasons for objection are in the main focused on a loss of residential amenity to the residents adjacent to the proposed bus route on the Old Cabra Road and are set out as follows:

1. The design places onerous and unnecessary restrictions on the vehicular movements of residents living adjacent to the bus corridor on the Old Cabra Road and Cabra Drive.
2. The consequences of the proposed restrictions on residents adjacent to the corridor will cause difficulties including a need to take unnecessarily long circuitous routes when accessing and egressing their homes. These residents have established a long standing legitimate and reasonable expectation of unfettered vehicular access to their homes since their acquisition and we submit that such interference, as proposed, cannot be justified on public policy grounds particularly in light of the alternative measure (outlined hereinbelow) which is an option that would not result in the loss of residential amenity to the residents or have a material adverse effect on the operation of the bus corridor. We propose this solution in the interests of proportionality.
3. The arrangements especially with respect to local access as set out in the NTA's application will increase motor traffic unnecessarily in the area beyond the corridor. In addition, there will be negative impacts on other road users who travel through the Cabra area and share the road resource.
4. The area around the Old Cabra Road and Cabra Drive is a well-established suburban community, which includes a significant number of older persons, and some disabled, who are less able to walk, cycle, carry heavy loads or otherwise access the local facilities that they rely on. The use of a car in some cases is, in fact, their only option.

3. ALTERNATIVE MEASURES

We seek amendments to the proposed plan to ensure the ease of excessive restrictions for the residents of the Old Cabra Road.

It is recommended that punitive traffic restrictions on residents along the Old Cabra Road and Cabra Drive be removed to allow the local residents to move freely for the length of the Old Cabra Road travelling in both northbound and southbound direction.

The number of private vehicles requiring reasonable local access is small and the frequency of vehicle movements are likewise small. It is therefore envisaged that this relaxation of constraints will not have a material adverse effect on the operation of the bus corridor.

We request that an additional Road Sign and/or an amendment to the exceptions as currently proposed on the 'No Straight Ahead' signs be provided at the locations set out in Table 1.1 below. The red text indicates our requested amendment to the existing proposed signs set out by the NTA. (For ease and clarity, please see the Appendix 1 map which sets out the NTA's proposed restrictions on the Old Cabra Road and the suggested alternative signs and exemptions set out Table 1.1).

Type	Regulatory Sign	Sign Location
New Sign Amendment to Proposed Sign	and/or NTA '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 Amendment to Proposed Sign	and/or NTA '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 addition of 'Access' as an exemption would be 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	

4. CONCLUSION

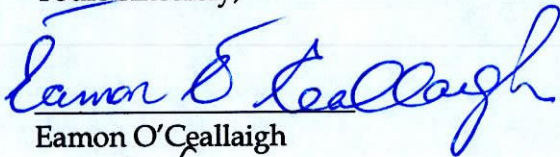
We fully acknowledge and welcome the need to improve accessibility for our city. In this regard, the NTAs investment in sustainable transport to improve the urban environment is welcome, however, we would request that the importance of the local need for access associated with the dwellings on the Old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

We respectfully request that An Bord Pleanála:

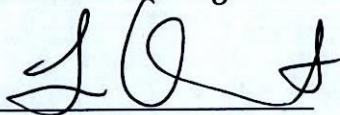
1. Request Further Information from the NTA that would provide for plans and particulars to allow for local access for the length of the Old Cabra Road in both northbound and southbound direction; or
2. In the event of granting planning permission for the proposed development, stipulate a condition that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



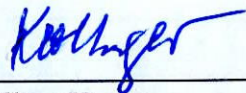
Eamon O'Ceallaigh



Trista Vincent



Robert Nolan





Killian Unger

(Committee members on behalf of residents)

Appendix 1: Alternative Regulatory Signs to Allow for Local Access Along the Old Cabra Road



—	Old Cabra Road and Old Cabra Road/Navna Road Junction	
●	NTA Proposed Regulatory Sign (Local Access Only)	
●	NTA Proposed Regulatory Sign (No Straight Through Except Public Service Vehicles and Bicycles)	
▲	Suggested Alternative/Additional Signage: (i) New Local Access Only Sign or (ii) Amend exemption to restriction to include for Access	