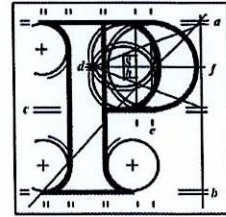


Our Case Number: ABP-316272-23

Planning Authority Reference Number:

Your Reference: Residents of Brighton Road and Brighton Square



**An
Bord
Pleanála**

Ambacht Limited
Fumbally Exchange
Malpas Street
Argus House
Blackpitts
Dublin 8

Date: 16 August 2023

Re: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme
Templeogue/Rathfarnham to City Centre

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 accept this letter as a receipt for the fee of €50 that you have paid.

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 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,

Eirnear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 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

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

August 2023

**SUBMISSION/OBSERVATION ON TEMPLEOGUE / RATHFARNHAM TO CITY CENTRE CORE BUS
CORRIDOR SCHEME DUBLIN**

Applicants:

Lorcan Staines and Shelley Horan	13 Brighton Road
Michael O' Gorman	20 Brighton Road
Mark Deering	25 Brighton Road
Kris Clarkin	59 Brighton Road
Maurice Murphy and Emily King	69 Brighton Road
Conor Smyth	18 Brighton Square
John Kerr and Cathy Kerr	47 Brighton Square
Brigitte de la Malène	5 Rathgar Avenue

Agent:

Bram D'hoedt MRIAI of Ambacht Limited

Agent's Postal Address:

Fumbally Exchange, Malpas Street, Dublin 8, D08 Y273

1.0 Introduction

Ambacht Limited have prepared this submission on the Strategic Infrastructure Development of Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme on behalf of the applicants as listed above. The submission seeks to request for additional Traffic Calming Measures to be installed along Brighton Road to mediate speeding cars along Brighton Road and avoid 'rat running' as a direct result of the proposed Bus Corridor Scheme.

2.0 Location

Brighton Road is a predominantly residential street located to the East of Terenure Village and to the West of Rathgar Village. The road is located in between Harold's Cross Road and Terenure Road East where the A-Spine, a Bus Connects Corridor subject of this Strategic Infrastructure Development Application is proposed. Brighton Road is a mature residential Local Street with a large amount of young families and older residents. The street also contains three childcare facilities and a church which leads to a high concentration of vulnerable road users actively using the street. Furthermore, in 2020 as a Covid mitigation measure, Glenone crèche moved their entrance from Terenure Road East to Brighton Road further intensifying the use of the street as an active neighbourhood street with vulnerable road users. Currently it is a two-way carriageway with on street car parking on both sides.



Image 2.1: View of Brighton Road looking South August 2023. Note narrow width of two-way street and on street car parking on both sides limits visibility of upcoming traffic on pedestrians trying to cross the street.



Image 2.2: View of Brighton Road looking North August 2023.

3.0 Existing Proposal

The current proposal of the Templeogue / Rathfarnham to city centre core bus corridor scheme at the junction of Terenure Road East and Brighton Road shows a raised table at the southern entrance to Brighton Road. No further mitigation measures are being proposed.

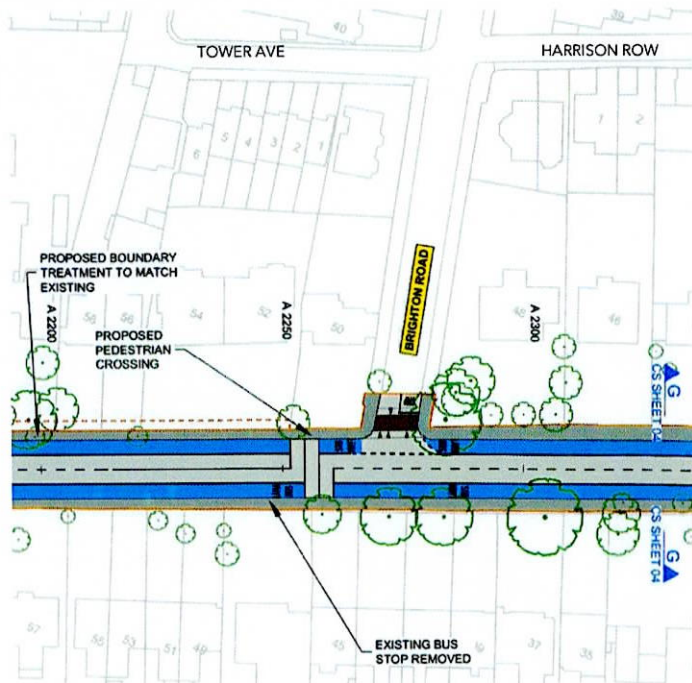


Image 3.1: Extract of the Templeogue / Rathfarnham to city centre core bus corridor scheme General Arrangement Drawings, Sheet 07 of 42, April 2023

4.0 The Observation

Despite recent reduction in speed limit from 50km/h to 30km/h, anecdotal evidence shows high speed rat running on a daily base by vehicles trying to avoid driving through Terenure Village / Rathgar Village by using Brighton Road or Brighton Road + Harrison Row as a bypass with a significant danger to the vulnerable road users and residents on the street as a result. As the transport modelling as part of this application shows, the traffic is expected to intensify down Brighton Road while no mitigation measures are proposed, further increasing the danger to residents and visitors of the child care facilities and church on the street. Brighton Road is designated as a Local Road and as such should be designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists in line with Design Manual for Urban Roads and Streets (DMURS). To date Brighton Road fails to do live up to this standard, and the (lack of) proposed changes to the road layout as part of this application appear to worsen the situation.

5.0 Traffic Calming Measures

As part of the road works associated with the the proposed bus corridor scheme, traffic calming measures should be introduced along the length of Brighton Road to reduce the speed of vehicles driving through and discourage the use of Brighton Road as a short cut and avoid 'rat running'.

A number of traffic calming measures can be appropriate for this location and are welcomed by the applicants as outlined below in order of preference. The aspiration is to reduce overall traffic speed (with associated pollution and safety benefits) and to emphasise to drivers that this is a residential area with a 30km/h speed limit.

- Low Traffic Neighbourhood

Given the three childcare facilities and predominantly residential nature of the street, a low traffic neighbourhood (LTN) would be the preference. By restricting traffic by means of traffic filters (for example planters / benches), the overall traffic speed on the road will be dramatically reduced and the safety of the most vulnerable road users will be increased while allowing continued through access for walking and cycling.



Image 5.1: Example of Low Traffic Neighbourhood with planted traffic filters

- One Way System

As a second preference, restricting the vehicular traffic into a single direction by preventing traffic entering Brighton Road via Terenure Road East. Subsequently, as the road width can be reduced, pavement widening can take place, contra-flow cycle lanes can be introduced and/or additional greening of the street can be added to greatly improve the placemaking of the street.

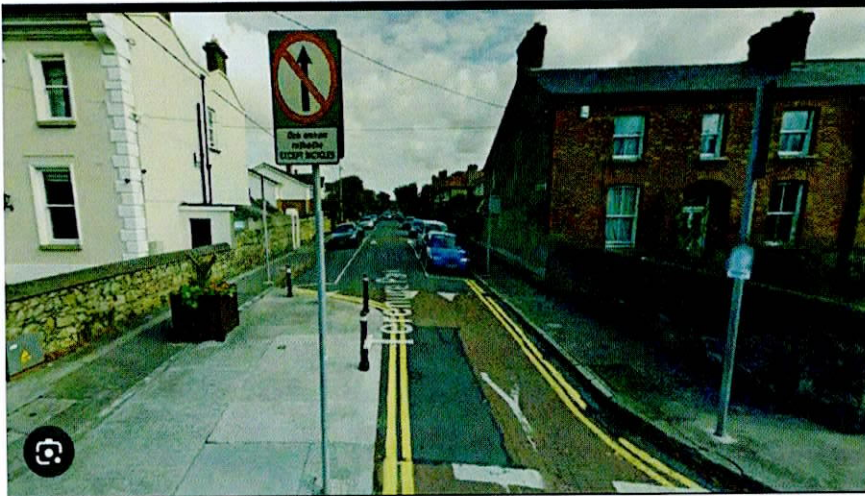


Image 5.2: Example of one-way street implemented in Terenure Park

- Raised Tables

Raised tables, or platforms, executed in the contrasting materiality to the road surface (zebra crossings) supplemented by belisha beacons could be placed strategically throughout Brighton Road to promote lower design speeds, slow turning vehicles at junctions and enable pedestrians to cross the street at grade. The current proposal only shows a raised table where Brighton Road meets Terenure Road East. Additional raised tables with contrasting materiality could be introduced at pedestrian crossings in front of the childcare facilities.



Image 5.3: Raised zebra crossing with Belisha Beacons

- Horizontal Deflections

Horizontal deflections through the use of Traffic Calming Planters could be deployed throughout Brighton Road to discourage through traffic and HGVs. Deflections can be created by varying the kerb line/street alignment causing the carriageway to broaden and narrow and/or creating a series of directional adjustments which could be in particular effective in combination with Raised Tables (see above) and material changes. The current proposal maintains the overall road width at the junction of Brighton Road with Terenure Road East (See Image 3.1). The Applicants would welcome a similar intervention as is currently proposed at the junction of Grosvenor Road with Rathgar Road as part of this application (See image 5.4 below) where the pavement is locally widened to reduce pedestrian crossing distance which guarantees low entering speeds of vehicles further supplemented by a *NO RIGHT TURN* sign.

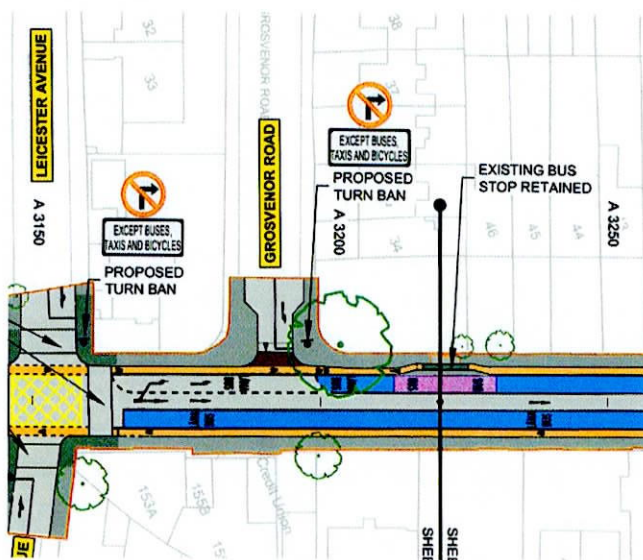


Image 5.4: Extract of the Templeogue / Rathfarnham to city centre core bus corridor scheme General Arrangement Drawings, Sheet 09 of 42, April 2023. Note proposed local widening of pavement to reduce pedestrian crossing distance at raised table at junction of Grosvenor Road with Rathgar Road.



Figure 4.71: An example from Ingress Park, Kent, UK, of how the path and speed of a vehicle is altered within a low speed environment through the use of vertical and horizontal deflections (and material changes).

Image 5.5: Extract from *Design Manual for Urban Roads and Streets May 2019 (Version 1.1)*



Image 5.6: Recently installed parklets in Reuben Street, Dublin 8 making the traffic weave through the street to ensuring no high traffic speeds can be achieved.

6.0 Dublin City Development Plan

As Chapter 8: Sustainable Movement and Transport of the Dublin City Development Plan (2022-2028) sets out, the policies and objectives are to address climate change through sustainable mobility and improve the public realm, streets and placemaking. Several objectives explicitly support the introduction of traffic calming measures in Brighton Road as outlined below:

- **SMT 1: Modal Shift and Compact Growth**
To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.
- **SMT8: Public Realm Enhancements**
To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City - Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.
- **SMT13: Urban Villages and the 15-Minute City**
To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.
- **SMT16: Walking, Cycling and Active Travel**
To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.
- **SMT17: Active Travel Initiatives**
To promote and help develop community-based coordinated initiatives at local level that encourage active travel and modal switch to sustainable transport modes, and to target underrepresented cohorts/groups in such initiatives.
- **SMT18: The Pedestrian Environment**
To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which

link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.

- SMT20: Walking and Cycling for School Trips
 - (a) To prioritise and target a significant increase in the number of children walking and cycling to and from schools;
 - (b) To promote walking and cycling for school trips to all educational facilities;
 - (c) To promote and support initiatives such as "Safe Routes to School", the 'Green Schools' and 'Schools Streets' projects, and to prioritise school routes for permeability projects and provision and enhancements of pedestrian and cycle ways.
- SMT21: Accessibility and Design at Schools

To ensure that the development of new schools or expansion of existing schools demonstrate accessibility by sustainable transport options and that the layout and design shall be optimised to prioritise permeability and safe routes for pedestrians, cyclists and users of all abilities.
- SMT33: Design Manual for Urban Roads and Streets

To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.

Editor's note: DMURS provides the practical measures to achieve:

- Highly connected street which allow people to walk and cycle to key destinations in a direct and easy-to find manner.
 - A safe and comfortable street environment for pedestrians and cyclists of all ages.
 - Streets that contribute to the creation of attractive and lively communities.
 - Streets that calm traffic via a range of design measures that make drivers more aware of their environment.
-
- SMT34: Street and Road Design

To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.
 - SMT35 Traffic Calming and Self-Regulation Street Environments

To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists.

7.0 Support for Traffic Calming Measures

Following near-misses and incidents due to traffic speed, a self-organised survey by residents was carried out in November 2019 in support of installation of traffic calming measures in the form of bollards on Brighton Road. Over 50 residents and business signed the petition back then. Since the survey, further incidents have occurred including a vehicle crashing into the car of a pregnant woman at high speed while she was dropping her children off at the childcare facility on Brighton Road.

Petition to install bollards to combat "rat running" on Brighton Road

Petition summary and background	Brighton Road is being used by cars, vans and trucks as a "rat run". Many of these vehicle users are speeding. There are a number of car garages in the area who are using Brighton Road for test driving vehicles. There are three child care facilities on Brighton Road (Glenone Montessori & Nursery, Brighton Day Care and Highfield Montessori). Brighton Road has a large amount of walkers, buggies, scooters, cyclists, dog walkers and children playing on the road. There is a real risk that a child or adult will be injured or killed. Installing bollards to stop the road being a "through road" will eliminate this problem.
Action petitioned for	We, the undersigned, are residents or daily users of childcare on Brighton Road who request Dublin City Council to install bollards on Brighton Road to combat "rat running"



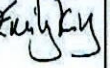
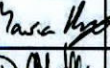
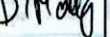
Printed Name	Signature	Address	Comment	
Lorcan Staines		19 Brighton Road, Rathgar, Dublin 6		11/11/2019
Shelley Horan		13 Brighton Road, Rathgar, Dublin 6	My daughter was nearly knocked over recently.	11/11/2019
Emily King		66 Brighton Road, Rathgar, Dublin 6	In addition, Harrison Row (linking Brighton Road to Rathgar Avenue), which for long stretches has no footpath, is dangerous for pedestrians and measures to decrease car speeds are necessary	11/11/2019
Maurice Murphy		66 Brighton Road, Rathgar, Dublin 6		11/11/2019
Daniela Molloy		66 Brighton Road, Rathgar, Dublin 6		11/11/2019

Image 7.1: Extract of Petition organised in November 2019 to combat "rat running" in Brighton Road

8.0 Conclusion

The current proposal of the Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme falls short in ensuring that Brighton Road is designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists.

As outlined above, the submission seeks to request for Traffic Calming Measures to be installed along Brighton Road to prevent cars speeding along Brighton Road and avoid 'rat running' as a direct result of the proposed Bus Corridor Scheme.

Yours Sincerely,



Bram D'hoedt

MRIAI MScArch BScArch

Director

For AMBACHT