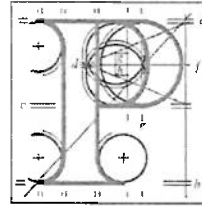


Our Case Number: ABP-317742-23

Your Reference: Shamrock Hill Mgmt. Ltd.



**An
Bord
Pleanála**

R.G. Greene and Associates
Caher House
Loughrea
Co. Galway

Date: 17 October 2023

Re: BusConnects Bray to City Centre Core Bus Corridor Scheme
Bray to Dublin 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 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,



Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

Teil	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

R. G. GREENE & ASSOCIATES
CONSULTING ENGINEERS
Civil, Structural, Environmental & Forensic

Our Ref: 3923/RG

7th October 2023

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

RE: An Bord Pleanála SID Case Reference No KA27.317780

Subject: Bray to Dublin City Centre Core Bus Corridor Scheme Compulsory Purchase Order.

Applicant: NTA

Dear Sirs,

We are instructed by our client **Shamrock Hill Management Co Ltd, Donnybrook Castle, Donnybrook, Dublin 4** to make an observation in respect of the lands to be acquired in respect of the above Scheme by Compulsory Purchase Order from Dublin City Council and The Company Secretary, and as set out as lands which are being **Permanently Acquired**, and are labelled **1012(1).1a**, and lands which are being **Temporarily Acquired**, and are labelled **1012(2).2a**, all in Drawing No 0013-SM-0146 Rev. M01 which was submitted with the SID Application.

We confirm payment of the requisite fee in the sum of €50 in conjunction with the submission of this observation online.

We set out the reasons and arguments for submission of this observation hereunder, as follows:

1. STOP LINE LOCATION

The Works for which the CPO is purported to be necessary would result in the creation of a traffic safety hazard for vehicular access and egress from the Donnybrook Castle development.

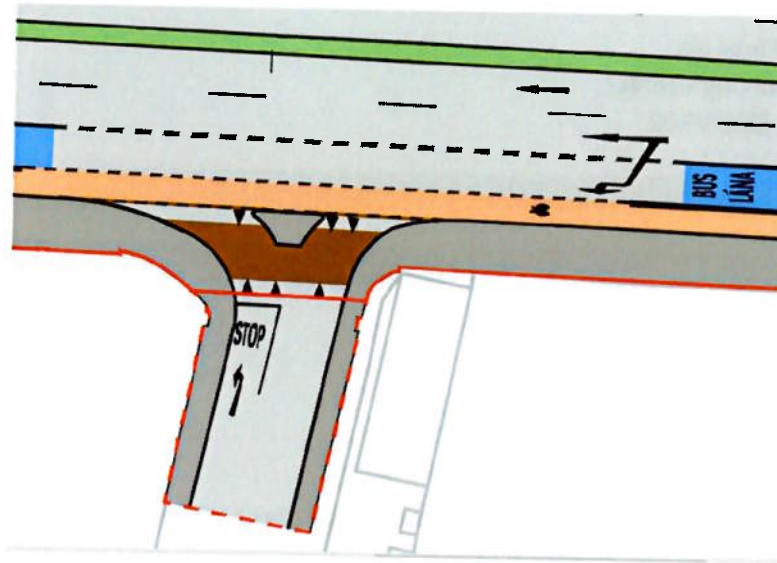
Caher House, Loughrea, Co Galway H62 FF61

[REDACTED]



The Donnybrook Castle development consists of 84 apartment and 20 residential units which all avail of the single vehicular/pedestrian entry off the Stillorgan Road via the lands which are the subject of the CPO in this case.

The proposal involves the provision of a **STOP** line at a location within the mouth off the entrance where there is no visibility splay to emerging vehicular traffic due to the obstruction posed by the Lodge on the southern side of the mouth of the roadway, as shown in the extract from SHEET 09 of the Scheme



It is submitted that a view to the right is essential in the particular circumstances of this case where egressing traffic is entering onto a major traffic route which is heavily used at all times.

The proposed design is not in compliance with Chapter 4, Section 4.4.6 of DMURS which advises that a visibility splay should be provided at junctions, as extracted below :

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Design Manual for Urban Roads and Streets

4.4.5 Visibility Splays

Visibility splays are included at junctions to provide sight lines along the intersected street to ensure that drivers have sufficient reaction time should a vehicle enter their path. Visibility splays are applied to priority junctions where drivers must use their own judgement as to when it is safe to enter the junction. Junction visibility splays are composed of two elements: the X distance and the Y distance.

Longer X distances allow drivers more time to observe traffic on the intersected arm and to identify gaps more readily, possibly before the vehicle comes to a stop, thus allowing increased vehicle speeds through junctions. Furthermore, a longer X distance may encourage more than one vehicle on the minor arm to accept the same gap even where it is not ideal that they do so. Neither circumstance is desirable in urban areas.

2. Raised Pedestrian Table

The Works for which the CPO is purported to be necessary involves the construction of a raised pedestrian table as expressed in Volume 2 Chapter 4 -Section 4.6.2.2 in respect of minor junctions, as extracted below:

Chapter 4 - 4.6.2.2 Pedestrian Crossings

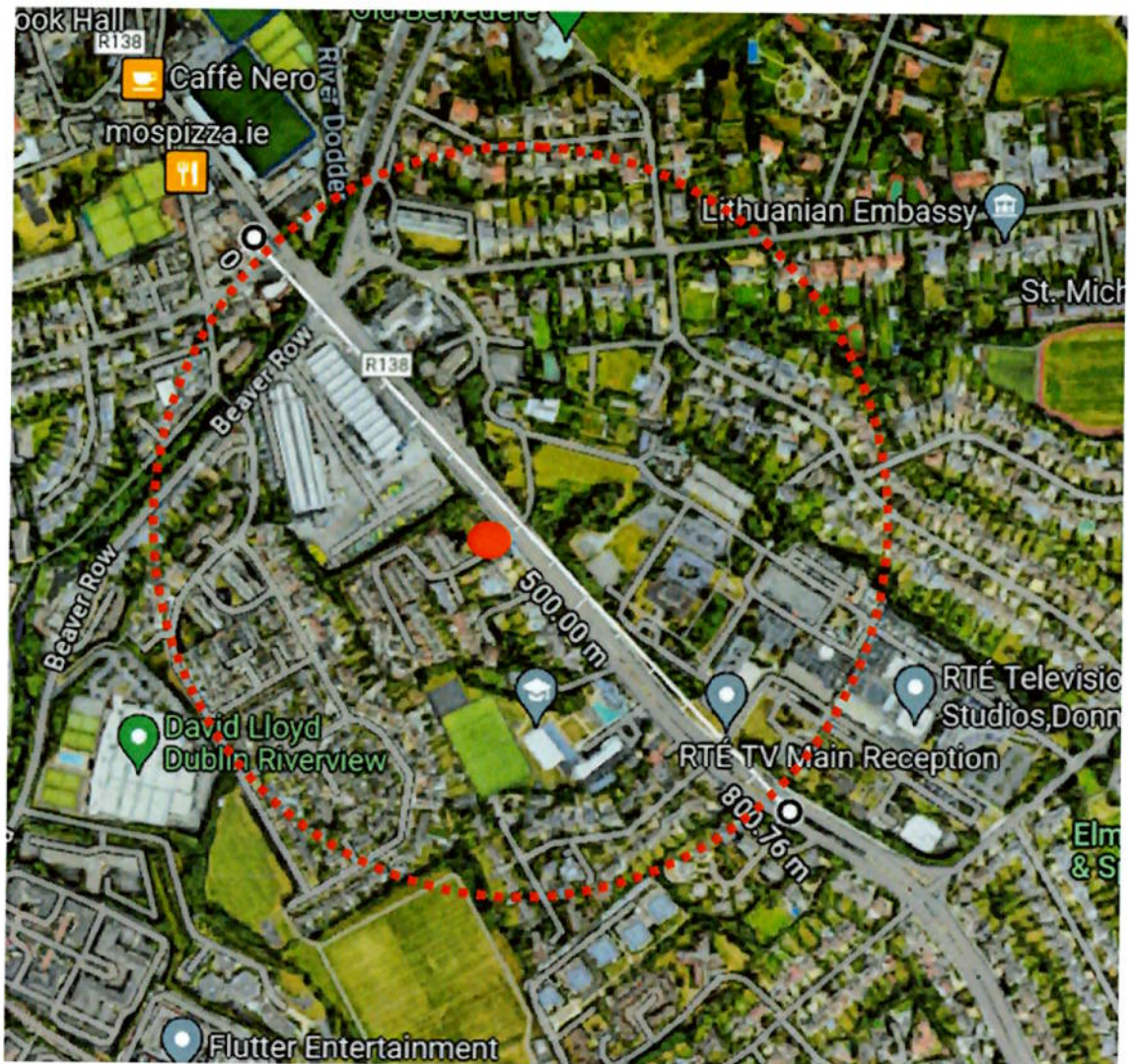
At signalised junctions and standalone pedestrian crossings, the footpath is to be ramped down to carriageway level to facilitate pedestrians who require an unobstructed crossing. At minor junctions, raised tables are provided to raise the road level up to footpath level and facilitate unimpeded crossing. Tactile paving is provided at the mouth of each pedestrian crossing and audio units will be provided on each traffic signal push button to assist mobility impaired users. Pedestrian crossings are indicated in the Landscaping General Arrangement drawings (BCIDB-JAC-GEO_GA-0013_XX_00-DR-CR-9001) in Volume 3 of this EIA.

The impact of this structure on the existing junction is shown in the aerial view below, in which the raised pedestrian table is to be located across the full width of the junction and the outer edge will be ramped down to carriageway level on the inner edge of the bicycle lane on the Stillorgan Road.



The provision of a raised table at this location will constitute a significant impediment to the safe use of the junction by ingress and egress traffic.

It is submitted that the provision of this structure is a disproportionate response to the need to facilitate pedestrian crossing requirements at this location.



The junction is located on a very busy arterial dual carriageway route heading in and out of Dublin City from the south environs.

The above aerial view demonstrates that there are no facilities or amenities within the 400m pedestrian radius from the junction. Pedestrian crossing facilities are not provided in the vicinity on the Stillorgan Road.

Accordingly, it can be reasonably concluded that pedestrian travel mode in this area is negligible.

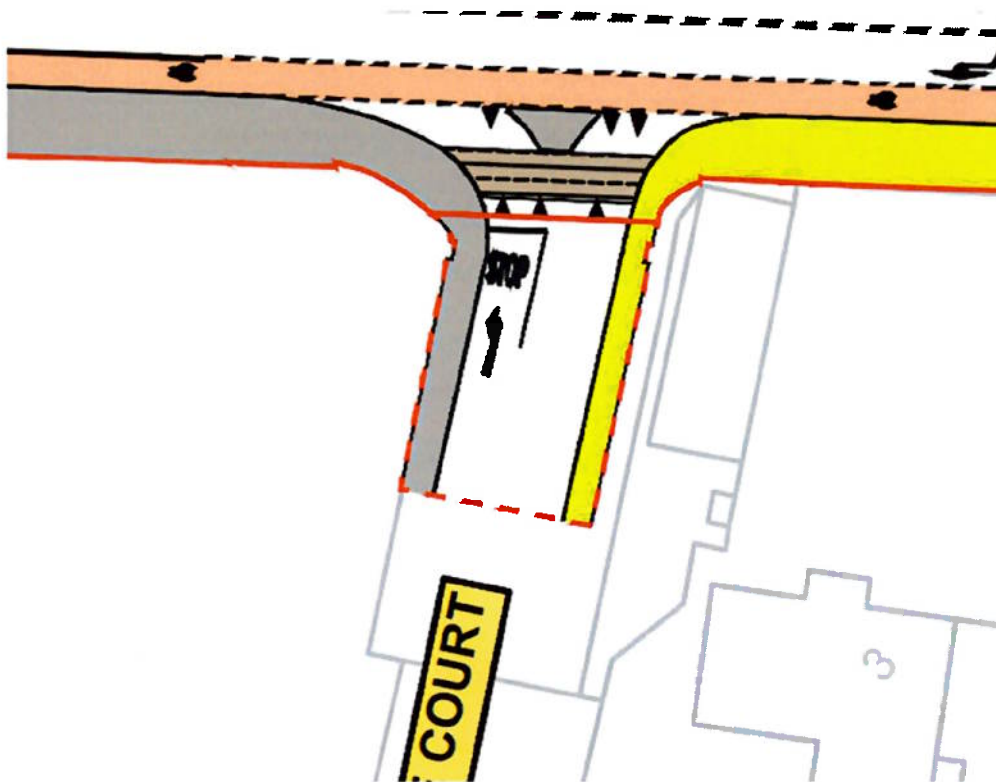
Therefore it is submitted that the use of a raised pedestrian table is not necessary at this location, particularly, where the circumstances cited in DMURS Chapter

4.4.7 for the provision of raised tables do not prevail, and are not advised in the situation which prevails at the junction.

It is submitted that the provision of a courtesy crossing, as outlined in Chapter 4.3.2 of DMURS, and defined by a change in material alone, will be sufficient in the circumstances of this junction to allow pedestrians to informally assert the required degree of priority over drivers.

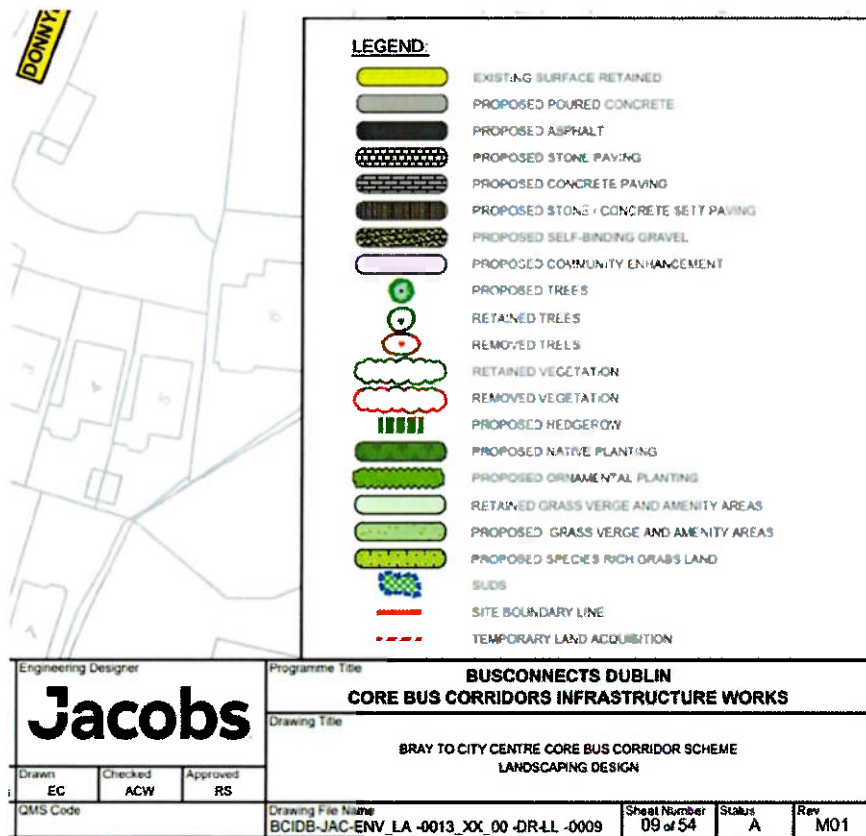
3. Landscape

The impact of the scheme is particularly delineated on SHEET 09 Volume 3 Chapter 4 in respect of Landscape, as extracted below:



In the first instance, it is to be noted that the layout of the raised pedestrian table is not in agreement with the plan shown in the General Arrangement Section, as abstracted in Section 1 above. It is now shown offline from the 'desire' route, as determined by the existing adjoining footpaths on either side. This layout is contrary to advice in Chapter 4.3.2 of DMURS.

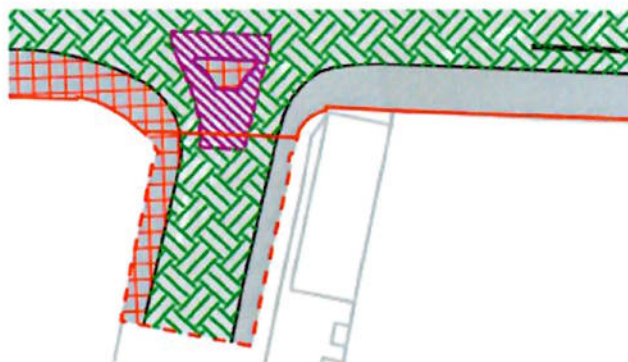
It is to be noted, having regard to the Legend to the above Drawing, as abstracted below:



that the existing footpath surface to the south of the junction, and extending into the junction, is denoted as 'existing surface retained'.

However, the footpath surface to the north of the junction, including that extending into the junction is to be replaced with 'proposed poured concrete'.

This proposal is further set out in the SHEET 09 Pavement Treatment Plan, abstracted below:



It is clear that the entire area of the 'temporarily acquired' lands are to receive a 'proposed overlay'.

It is submitted that the existing internal footpaths on either side of the junction are in similar satisfactory condition .

The partial renewal of surfaces, as proposed under this scheme, will have a negative impact on the appearance of the entrance to the development and will detract from the value of the property.

4. Conclusion

It is submitted that the design and layout of the junction of Donnybrook Castle Development with the Stillorgan Road is in good condition and has fulfilled its function in a manner which is fit for purpose and is safe, for a period in excess of thirty years.

It is submitted that the design and layout of the junction, in its current condition, does not negatively impact or restrict the construction of the Bray to Dublin City Centre Core Bus Corridor Scheme.

Accordingly, it is submitted that the design and layout of the junction should remain unchanged, and that there is no need for the planned intervention, as set out in the Compulsory Purchase Order, save for the provision of a courtesy crossing, in the style as set out in Chapter 4.3.2 of DMURS- defined by a change in material alone, and associated minor modification of the existing splitter island at the junction.

It is further submitted that the overall design of this junction has been overlooked, and thereby not been given proper and adequate consideration at the planning stage of the scheme.

It is submitted that Shamrock Hill Management Company Limited should be indemnified against all future liability arising out of any acts of misfeasance in relation to the reinstatement/condition of the surface of the lands which are subject to temporary acquisition as a result of this project .

Signed,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

R. G. Greene & Associates