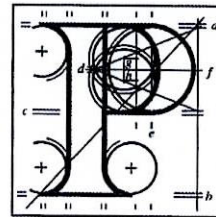


**Our Case Number:** ABP-314056-22



**An  
Bord  
Pleanála**

Jean Early  
11 McDowell Avenue  
Ceannt Fort  
Mount Brown  
Dublin  
Dublin 8  
D08 4YYE

**Date:** 26 September 2022

**Re:** Liffey Valley to City Centre Core Bus Corridor Scheme.  
Fonthill Road to High Street all in the County of Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above 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 be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

BL50A

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

Jean Early  
11 McDowell Avenue, Ceannt Fort,  
Mount Brown, Dublin 8, D084YYE  
Email: j[REDACTED]

11<sup>th</sup> September 2022

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

**Re:Submission–Objection to the development consisting of the construction of the Liffey Valley to City Centre Core Bus Corridor Scheme.**

Dear Secretary

I am resident of Ceannt Fort, Mount Brown, Dublin 8 for over 15 years.

I am an active member of the Dublin 8 Residents Alliance Group (RAG) which is a collaborative group comprising of resident's associations, groups and individuals either directly impacted or bordered by the New Children's Hospital development (NCH) at the St. James site and other local developments in the area. The RAG consists of Ceannt Fort residents association, Old Kilmainham residents association (includes Mount Brown), South Circular residents association, Rialto residents association, 4 Terraces residents association, Drimnagh residents association and Brookfield residents association.

I have looked at the **Liffey Valley to City Centre Core Bus Corridor Scheme** Planning Application Report that is now lodged with you for planning permission.

I wish to make a submission relating to the application proposal along the Mount Brown area of the Liffey Valley to City Centre Core Bus Corridor and object to the proposed bus gate at Mount Brown / James street.

Ceannt Fort estate has just celebrated its 100-year centenary. The introduction of some elements of the proposed Bus Connect will seriously impact the amenity value of our estate as listed below. There are 202 dwellings in Ceannt Fort but only one vehicular entrance / exit which enters/exits onto Mount Brown Hill. This access is smack in the middle of the proposed bus gates with one to the right and one to the left.

Ceannt Fort has a rich historical heritage as acknowledged by DCC when it was put forward as a priority ACA area in the current Development plan. The site was formerly McCaffrey's Orchard associated with the South Dublin Union and the 1916 rebellion as testified with witness statements, historical documents, and photos.



Weblink Reference:

<https://photogallery.militaryarchives.ie/thumbnails.php?album=48>

1. The design and location of the proposed bus gate at Mount Brown / James street will cause great inconvenience and disruption to the communities of Ceannt Fort, Mount Brown Kilmainham , James Street and environs as well as staff, visitors and patients to St James Hospital (SJH).

There is a proposal to add a "bus gate" at SJH entrance along James Street in an eastward direction heading to the city centre which will be operational for 4 hours each morning from 6am to 10am preventing cars from entering the city along this route. A second "bus gate" heading westward towards Kilmainham / Inchicore will be located on Mount Brown beside the new entrance to the New Children's Hospital (NCH). This will be operational for 4 hours a day from 4pm to 8pm. See comments re these hours in Section 8 below.

**\*\*NO ALTERNATE ROUTES OR IMPACT ON EXISTING ROUTES WERE CONSIDERED FOR THIS APPLICATION\*\***

If the bus gate is installed eastwards towards the city on James Street it will add miles onto peoples journey if you want to enter the city or head to the quays as in the morning one will have to go up to Kilmainham along Emmet road, into Inchicore village and Sarsfield road onto the Con Colbert Road back along by Huston station just to get onto the quays..... and the city centre. There will be similar hardship for those trying to head west in the evenings.

Not everyone can use public transport, bikes or walk for various reasons including disabilities. We also have the experience here of buses arriving full with passengers from the earlier stops in the suburbs and not stopping at our local stops so residents most impacted by the bus connect proposal don't benefit from it.

I believe that most SJH staff and patients are unaware that on exiting the main hospital after work they won't be able to turn left..... it's a nightmare turning right as the luas tracks and frequency keep the lights red. All SJH traffic will have to go thru this route as the current internal hospital road will be only for buses, taxis and ambulances once the construction of the new Children's hospital is completed, as per planning approval for the New Children's Hospital (NCH)

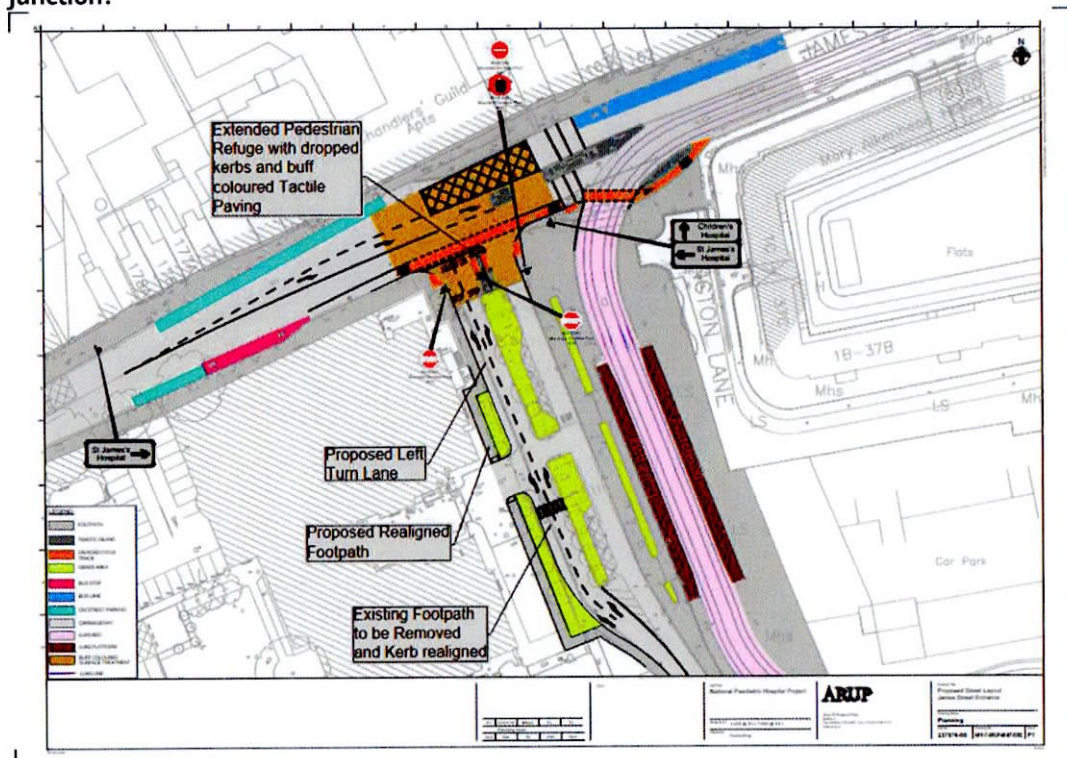
If this bus gate does go ahead at Mount Brown could car recognition registration plates (or other alternatives) for local access be used to allow Ceannt Fort residents pass through? We were told by NTA at an earlier consultation that current road traffic legislation does not allow for this. However we have not been able to find any documents to support this or documents that even refer to a bus gate. Requests to NTA requesting such documents have not been responded to. Please could you provide evidence in support of this claim so that we can review it?

- The new children's hospital (NCH) planning permission requires an additional traffic lane to be added at the St James Hospital (SJH) junction. This was proposed to allow cars exiting west leave the campus and not back up behind cars waiting to turn right towards the city. The traffic lights at this junction are red a lot to prioritise the Luas line crossing causing a big tail back into the SJH site and James Street.

The traffic numbers in the EIS and as presented at the oral hearing for the New Children's Hospital claimed that this was necessary due to the volume of traffic predicted as SJH will only have the one access / exit route once the through road from Rialto gate in the hospital is closed to general traffic. In the evenings it was estimated by the NCH that an additional 140 cars PER HOUR from SJH would be using this exit to turn left, this is in addition to the bumper to bumper traffic heading out of town. How can the Bus Connects proposal, if approved, be allowed to make this current situation worse by preventing a left turn in the evenings?

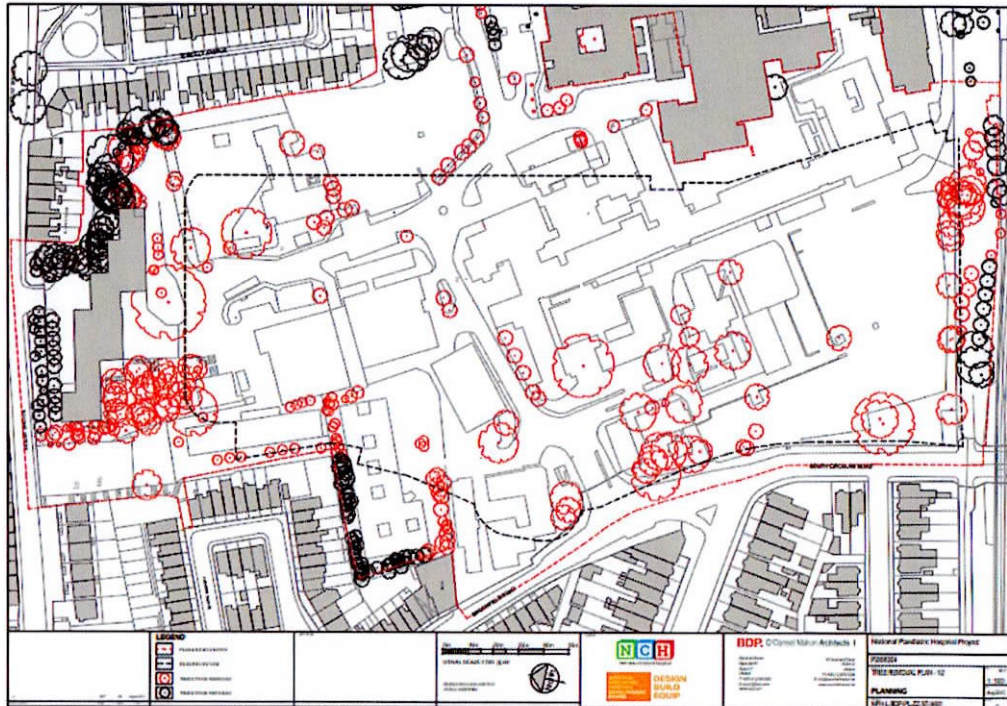
Planning Reference no: Ref No. PL29N. PA0043 drawing No: NPH-T-ARUP-00-ST-0002 copy below

**How can 2 different planning permissions co-exist for the same site and same busy traffic junction?**



3. The proposed westbound bus gate location at the new entrance to the New Children's Hospital bus gate at Mount Brown involves the removal of trees outside the St. James Hospital Energy Centre to facilitate the construction of a new slip road.

As part of the planning application for the New Children's Hospital (NCH) Planning Application Ref No. PL29N. PA0043 these trees were to be retained. See EIS and drawing number NPH-L-BDP-PL-ZZ-ST-9401. Copy below

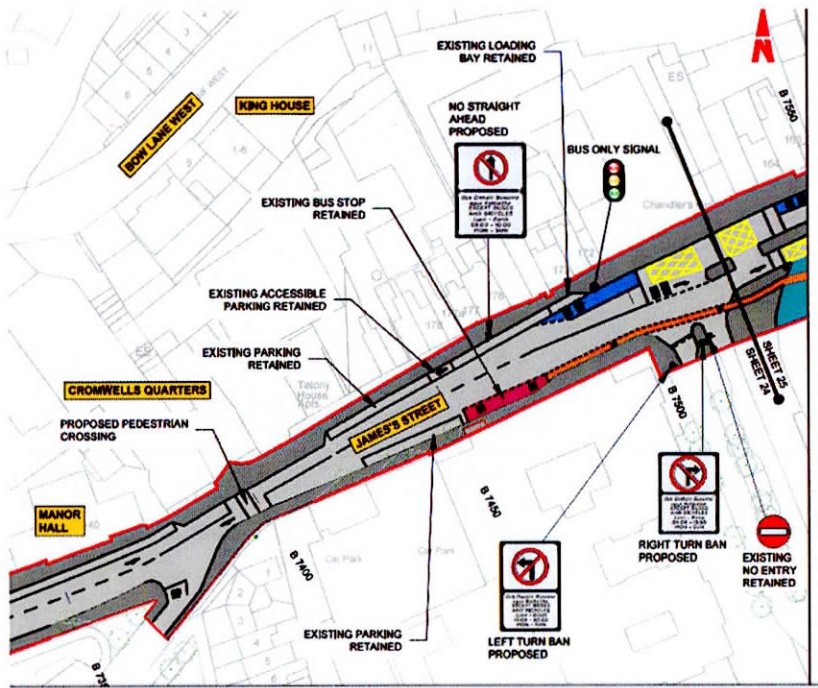


4. The traffic numbers used for this planning application aren't a true reflection of traffic numbers as they were recorded during the Pandemic Covid lockdown. Calculations are flawed as they do not reference the fact that the true road through St James Hospital is due to be closed next year to through traffic (apart from buses and emergency vehicles) so there will be no access for local residents from rialto to mount brown. These road closures are part of the New Children's Hospital (NCH) Planning Application Ref No. PL29N. PA0043, Development Type: Strategic Infrastructure Development (SID)

Under this planning application it should be noted that there is only going to be one access route to / from St James Adult Hospital for all staff, patients, and visitors. This is via the entrance on James Street. How can it be considered acceptable that there will be no left turn (west bound) in the evenings or right turn (east bound) in the mornings? Again this goes against the design and permission for the NCH where an additional traffic lane to allow additional cars turn left to accommodate flows in the evening based on the traffic numbers in the EIS for the NCH planning application.

- The submitted drawing no BCIDB-JAC-GEO\_GA-0007\_XX\_00-DR-CR-0024 sheet no 24 Of 28 is flawed and should invalidate the application as NO bus gate is located or referenced on the drawing at the St James Hospital entrance. The westbound bus gate at the NCH Mount Brown entrance is shown and referenced on drawing no BCIDB-JAC-GEO\_GA-0007\_XX\_00-DR-CR-0023 sheet no 23 Of 28.

**\*\*THIS SHOULD INVALIDATE THE APPLICATION or as a minimum REMOVE THE BUS GATES ELEMENT FROM THIS PLANNING APPLICATION\*\***



- Removal of disabled parking along James Street / Thomas Street. The statement in Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report Chapter 04, Section 4.5.3.7 Table 4.20 section 3 shows that on James street /Bow lane west there are currently 13 parking spaces which are all to be removed. On Thomas Street / High Street all 22 parking spaces are to be removed in addition 2 of the 3 disabled parking spaces are to be removed. Having 1 no disabled space for this street is unrealistic and unsustainable as invalid parking spaces beside a national hospital and the heart of the liberties needs increasing not reducing to 1 space. Not all people with disabilities can use buses or walk and need to use cars for transport. This application does not give any consideration to this fact.

7. The statement in Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report Chapter 04, Section 16.3.1.4 Architectural Conservation Areas (ACAs) states: *"An ACA is a place, area, group of structures or townscape that is of special architectural, historical, archaeological, technical, social, cultural, or scientific, interest, or that contributes to the appreciation of a protected structure or group of protected structures. A review of the Dublin City Development Plan 2016-2022 (DCC 2016), Draft Dublin City Development Plan 2022 - 2028 (DCC 2021), South Dublin County Development Plan 2016-2022 (SDCC 2016) and Draft South Dublin County Development Plan 2022-2028 (SDCC 2021) indicates that there is one ACA located within the study area of the of the Proposed Scheme, the Thomas Street ACA"*

**THIS IS INCORRECT.** The Dublin City Development Plan 2022 - 2028 (DCC 2021) Objective BHA02 states "to identify and designate further Architectural Conservation Areas within the identified priority areas in accordance in accordance with the Architectural Heritage Protection Guidelines 2011"

Section 11.5.2 of The Dublin City Development Plan 2022 – 2028 lists "Ceannt Fort" as one of the Priority Architectural Conservation Areas which means it will be one of 15 ACAs to be progressed over the development plan period. THIS HAS NOT BEEN CONSIDERED AS PART OF THIS APPLICATION. The Ceannt Fort estate and access to and from it needs to be treated with greater sensitivity.

Ceannt Fort is currently zoned Z2, Residential Neighbourhoods (Conversation Areas). It is also located within a zone of Architectural interest.

8. The statement in Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report Chapter 04, Section 4.6.4.3 Bus Gates states: *"The hours of operation of the bus gates will be subject to on-going review based on prevailing traffic conditions and the goal of achieving the project objectives. The NTA and local authorities will co-operate in good faith to address any issues with the hours of operation that may arise during the lifetime of the Proposed Scheme"*. This statement does not address local residents concerns as submitted previously, it is an unambiguous sentence open to interpretation whenever bus connects wishes to change the parameters to suit the narrative of community engagement.

This statement raises real concern to all local residents as we feel its an excuse to revert back to the 24 hour bus gate as originally proposed. We have no confidence that the proposed hours for the bus gate will be retained. These hours are for a total of 8 hours consisting of east bound bus gate , towards city centre, 6am-10am (4 hours) and west bound busgate, towards Inchicore and the west of Ireland, 4pm -8pm (4 hours)

9. As part of the New Children's Hospital (NCH) Planning Application Ref No. PL29N. PA0043, Development Type: Strategic Infrastructure Development (SID) a traffic mobility plan is required to be developed by SJH and co-ordinated by DCC. Ref ABP Inspectors report.

A Traffic and Mobility Workshop group was set up to explore how mobility and traffic (Parking, Car, Cycle, Pedestrian and Public Transport) might be facilitated and planned in an environmentally sensitive and sustainable manner in the Dublin 8 area. The Objective is to open discussion and explore possible key actions that anticipate and prepare for challenges related to mobility and use of the urban landscape with increased human traffic moving into and out of the hospitals and throughout the Dublin 8 area.

The Participants are the Mobility Management team in the two hospitals (SJH & NCH) : a representative group (max 8 persons) drawn from the local community via the residents

representation on the NCH Residents Project Monitoring Group and Residence Alliance Group (RAG): elected members of Dail and Council representing Dublin South Central ; the senior relevant decision makers and key stakeholders including Dublin City Council Traffic/Planning ; Dublin Bus, Transport Infrastructure Ireland and Bus Connect team. The first meeting was held in June and the next one is scheduled for late September.

**The aim of the Workshop is to open discussion and identify a series of actions** that the key stakeholders might consider assisting the two hospitals with their own mobility plans and to ensure that increased traffic flow does not negatively impact on the local community.

The outputs of the first workshop were an agreed set of issues and concerns to be addressed in the immediate future, to report back to the second Workshop in Sept/Oct. the biggest item of concern was the proposed bus connect corridor bus gate, which at the time was to be located at Mount brown. We were NOT informed that the eastbound bus gate was to move to SJH entrance which as stated above creates a worse impact for us resident and we respectfully request that the BUS GATE is omitted from the scheme and the planning application.

**I would like to request that this planning application goes to an oral hearing.**

I enclose a payment for €50 to An Bord Pleanála for my application.

Yours sincerely  
**Jean Early Dip Arch, MRIA**