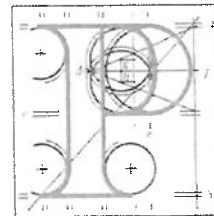


**Our Case Number:** ABP-316272-23



**An  
Bord  
Pleanála**

Belgrave Residents Association  
c/o Mary Crosbie, Chairperson  
27 Ormond Road  
Rathmines  
Dublin 6  
D06XK68

**Date:** 24 April 2024

**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 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 the mean time, please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

An Bord Pleanála (Strategic Infrastructure Division),

ABP- 316272-23

64 Marlborough Street, Dublin 1, D01 V902

26<sup>th</sup> March 2024 Updated Submission re Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

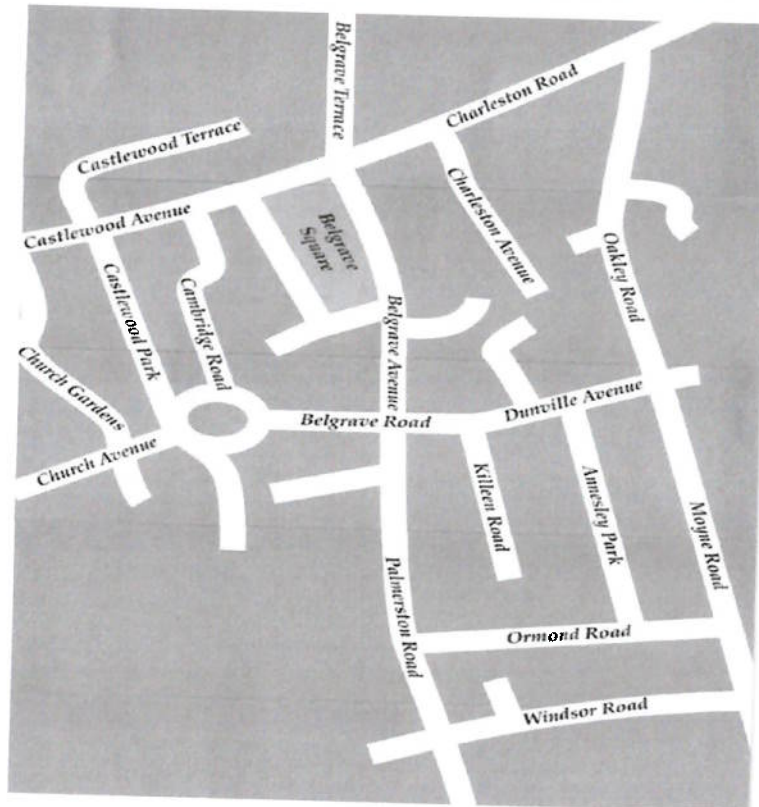
Belgrave Residents Association (BRA) understands that Dublin transport infrastructure needs to be amended for active travel (e.g., by encouraging both walking and cycling), and by the provision of an enhanced public transport structure (bus priority measures being adopted in order to minimise car use, and carbon emissions).

BRA supports these objectives as we believe it is necessary to provide an efficient and effective bus service to cater for the growth of Dublin City and surrounding areas.

BRA feels that currently NTA Bus Connects proposed scheme as it stands would only end up in redistributing traffic to other local roads, and therefore add more congestion to already congested side streets, which would of course negate the initial goals of this project.

The role of BRA is to be a voice for the 800 households in our area between Rathmines and Ranelagh in relation to all proposals. Rathmines is not just an area that traffic travels through; it is a community with a vibrant and thriving commercial centre that provides a range of services to a diverse population.

**Map of area covered by the Belgrave Residents Association**



<b>AN BORD PLEANÁLA</b>	
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Time: 15:09	By: <i>Nard</i>
27 MAR 2024	

As is the case in many parts of Dublin the Rathmines-Ranelagh network of streets is a bit of a "hotch potch" - many narrow streets, awkward angles etc.

Forcing even a reduced level of car traffic onto Castlewood Avenue and surrounding roads is going to create significant congestion in Ranelagh - another important route for existing bus services.

We therefore oppose this proposed scheme as it stands.

Before any permission is granted, we recommend that more light is shed by NTA on the impact Bus Connects would have in the following areas:

### Access to Rathmines

Lower Rathmines is not part of Belgrave Residents Association direct area of membership, but its facilities are much used by many residents living nearby.

We are concerned about access relating to a number of facilities.

These include access to St. Mary's Community Centre, Richmond Hill, along with other services this centre provides meals on wheels for older residents in the Rathmines and Ranelagh area, delivers are by volunteers and driving is essential part of this extremely important service.

Access to Church of Mary Immaculate Refuge of Sinners, to which many elderly and/or disabled people are driven, often before 10.00 am. And this church is much used for weddings and funerals.

It's not clear what provision is being made for deliveries and services to the many households and small businesses on Lower Rathmines Road. And there are a number of houses on Leinster Square, off Rathmines Road, whose only motor exit option is onto Rathmines Road.

And there is the very active Leinster cricket, bowling and social club to which motor access is only off Rathmines Road.

In order to serve and maintain this thriving community and the small businesses that serve it, we recommend that all traffic measures including bus lanes, bus gates and cycle tracks operate on a shared basis with all who access Rathmines. During peak times, this would give priority to bus lanes, bus gates and cycle tracks, so that all can travel safely and efficiently to work and school.

We believe a clear plan should be developed before the granting of permission to proceed.

This could include a relaxation of the bus gate outside peak hours.

And consideration should also be given to operating a single lane for motor traffic with traffic travelling in the city centre direction having to turn left or right at the canal

### **Bus-gate at peak hours only**

In addition, we would propose that the bus-gate on the Lower Rathmines Road should only operate during peak hours, as was originally the case for the bus-gate at College Green. The Lower Rathmines Road is a natural access route for the whole area especially residents of the Liesenfeld which is north of the proposed bus-gate and should be fully utilisable when the demand for use by buses is lower, e.g. at night.

### Impact of traffic redistribution

#### **Castlewood Avenue - Charleston Road, Ranelagh & Harold's Cross**

The proposal to close the Lower Rathmines Road to through-traffic by cars means that inbound city-centre car traffic will be diverted down Castlewood Avenue or through Harold Cross. In terms of the area served by the Belgrave Residents Association, this would greatly increase traffic along Castlewood Avenue/Charleston Road and increase congestion in Ranelagh, which is already very congested at peak times and may well be introducing its own traffic calming proposals. As one of our members put it, "Ranelagh village, which has always been congested, will become a nightmare"

Footpaths along Castlewood Avenue/Charleston Road are not sufficiently wide to ensure that pedestrians would not feel crowded-in by the increased traffic that would result from this proposal.

**There are a number of residences with off street parking on Castlewood Avenue; one of our members living there has drawn attention to what is currently a major exiting problem which will be exacerbated by much increased traffic diversion .**

As it is this area is residential, with children living in the area, an additional pedestrian crossing should be designed to ensure people of all abilities can walk across the road safely, at the Castlewood Park/Ave junction towards the Swan Centre etc. Timing of traffic lights should prioritise pedestrians.

### **Upper/Lower Mountpleasant**

The proposal to restrict movements on Mountpleasant Avenue Lower, north of the junction with Richmond Hill to pedestrians and cyclists only through the introduction of planted build-outs this would impede the movement of residents as historically this is a customary route serving the surrounding area which runs (North/South) from Belgrave Square to Cowper Road and (East West) from Moyne Road/Oakley Road to Palmerston Road .**And it is not clear where and how car owning residents on and connecting to the street will be able to access those cars.**

There is a tendency to refer to all through-traffic as 'rat-running'. For many residents living in the area, Mountpleasant Avenue would be a normal route towards the canal.

Traffic on some streets which are already congested would undeniably be increased, namely the impact on Castlewood Avenue, Dunville Avenue have not been fully surveyed, even when Bus Connects have produced some estimates in respect of 10 roads. For instance, these projections for evening peak traffic increases areas follows according to Jacob Av Arub: 7.00 pm Castlewood Avenue + 36%, Charleston Road + 52 %, Church Avenue +56%, Belgrave Sq North + 45 %

No full survey of the impact of potentially huge increases in traffic on certain roads appears to have been done. These is one of the reasons why we oppose the proposed scheme as it stands.

### **Environmental impact**

The potential increase in Carbon emissions for school children and parents who walk and cycle in large numbers on these streets, in particular streets which allow access to local schools, should be assessed. For example, there are two large primary schools on Oakley Road which is accessed at one end from Dunville Avenue and at the other from Charleston Road (on which the current proposal will result in very significant traffic increase)

### **Park and ride**

Although NTA website stresses desirability of park and ride, this does not feature at all in the planning application as far as BRA can see.

### **On-street parking**

It would be important to retain a level of on-street parking, including disability parking, on the Rathmines Road. This would have benefits, in particular allowing deliveries to small businesses, providing opportunities to shop local. At present, there is a high level of compliance with, and enforcement of, such time-based parking restrictions.

### **Other issues of concern**

The vast amount of felling of trees due to the construction of the 230 KM of bus priority lanes is unacceptable. Slow-growing mature broadleaved trees absorb CO<sub>2</sub>, removing and storing the carbon while releasing oxygen back into the atmosphere. They also provide shade and provide wildlife habitat. These are only some examples of the ways in which trees improve our quality of life.

### **Additional Comment**

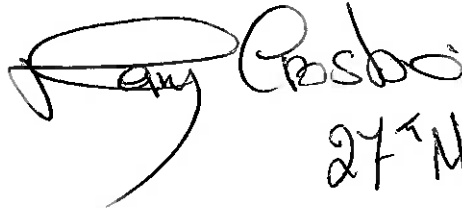
**We are aware of much adverse comment from several hundred residents in our own and adjoining areas concerning the very significant proposed ban on right hand turns into Ranelagh from adjoining roads on the Western side.**

**This will force those using cars to make much longer journeys which seems contrary to the objective, desired**

by all, of achieving reduced use of cars. Such use often will include ferrying sick adults or children to hospital and bringing disabled people on necessary journeys.

We continue to urge further research and consultation on these issues. And we continue to support the overall objective of improved bus services and accept that some reduction in car use is desirable but stress that plans should be capable of accommodating practical realities.

Chairperson ( Mary Crosbie)  
Belgrave Residents Association  
27 Ormond Road  
D06 XK68

A handwritten signature in black ink, appearing to read 'Mary Crosbie', written in a cursive style.

27<sup>th</sup> March 2024