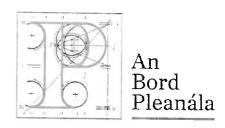
Our Case Number: ABP-316272-23



Margaret and Patrick Kelly 23 Charleville Road Rathmines Dublin 6 D06V1K5

Date: 26 March 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.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. 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.

Eimear Reilly **Executive Officer** 

Direct Line: 01-8737184

HA02A

Email

## **Eimear Reilly**

From:

LAPS

Sent:

2 - 4

Thursday 21 March 2024 14:49

To:

Patrick Kelly

Subject:

RE: comments on NTA response to public submissions on Bus Connects Corridor

Templogue/Rathmines to City Centre

Hi Patrick

I acknowledge receipt of your email. A formal acknowledgement will issue by post in due course.

Kind regards

Eimear

From: Patrick Kelly

Sent: Thursday, March 21, 2024 2:22 PM

To: LAPS < laps@pleanala.ie>

Subject: comments on NTA response to public submissions on Bus Connects Corridor Templogue/Rathmines to City

Centre

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

## To An Bord Pleanala - Case Reference No. ABP-316272-23

Thank you for your letter of 23 February 2024, inviting comments on the NTA response of 20 Dec 2023 to public submisssions on the Rathfarnham/Templeogue Bus Corridor.

While we recognize that it is entirely for the ABP to determine whether or not to hold an Oral Hearing on any application, this significant reduction in the public's opportunity to voice its views on this Scheme is strongly to be regretted. The comment on p. 46 of the NTA response that an Oral Hearing provides for "direct public engagement in the decision making process" of such large scale projects, suggests the applicants themselves regard holding an Oral Hearing necessary to ensuring proper statutory democratic participation in the current decision making process.

The NTA claims in relation to the objection that submitting the Rathfarnham Templeogue Bus Corridor as a standalone application does not amount to "splitting" are contentious, as there are significant differences between the precedents cited and the circumstances of the Bus Corridor Scheme. The 12 corridors of the Bus Connect proposal constitute an integrated scheme in which decisions on individual corridors have significant traffic impacts on traffic movements in immediately adjoining corridors. Submitting the proposed Corridors as stand-alone applications enables the NTA to avoid ABP consideration of these interactions, as for example the knock-on consequences of diverting of all incoming traffic along Rathgar Road/Rathmines Road via Charleston Road onto Ranelagh Road (whether via Castlewood Avenue/ Belgrave Square or via Richmond Hill/Mountpleasant Avenue/Belgrave Square). This "splitting" also serves to obscure the truly astronomical cost of the 12 Corridor Bus Connect Scheme which must exceed 25 billion Euro at current prices, and in the event will probably exceeed the cost of the Bank bail-out.

The 169 trees identified as due for destruction along the corridor include a substantial proportion of mature forest trees, especially along Terenure Road East, whose absorption of pollution will not be adequtely compensated for by replacing them with street trees.

The response to concern over the relocation of existing railings, gateways and garden walls as a result of road widening suggests that these historic features rather than being conserved and moved will be replaced by an unacceptable uniform, one-size fits all model.

Although the NTA response repeatedly emphasises the benefits that will accrue from the Scheme to all sections of the community, there is overall a notable lack of concern over its impact on the elderly, the disabled and those with young children.

No convincing reasons have been advanced against the suggestion that to ensure maximum use of public transport fares should not just be reduced but abolished altogether. Though the novelty of this might initially cause congestion on buses, it would be sure to settle down in a relatively short period.

The arguments against restricting the operation of the Rathmines Road bus-gate to 6 to 9 am and 4 to 8 pm would not seem to compensate for the inconvenience caused to local residents on both sides of the bus-gate.

The NTA synopsis of objections from the Rathmines section of the route ignores two of the matters raised in our submission.

- 1. The failure to identify what provision will be made for the maintenance of the proposed street plantings, a matter of particular significance in the early seasons after planting. The Dublin City Council is unable to maintain its own new plantings properly, as evidenced by the large number of dead saplings in parks, and has abandoned routine maintenance of established street trees. Given the envisaged increased frequence of prolonged summer droughts due to climate change, inadequate maintenance will both be extremely unsightly and result in the waste of the substantial sums expended on installing such plantings in the first place.
- 2. The highly adverse impact the Scheme will have on the main egress route from Charleville Road (which contains four appartment blocks, some eighty individual residences in the street and mews lanes, and a secondary school with over 600 girls) onto Rathmines Road via Wynnefield Road. The exit from Wynnefield Road onto Rathmines Road is on a blind corner giving restricted vision of incoming traffic, which will become considerably more dangerous with the introduction of the new bus-lane, particularly for those requiring to access to Castlewood Avenue and Ranelagh (which as a result of the new bus gate further down Rathmines Road will constitute the bulk of traffic exiting Wynnefield Road). The only other exit route from Charleville Road and its mews lanes is along a narrow link roadway running from the entrance to St Louis Convent to Leinster Road. This roadway is only wide enough for two carriageways, currently set out as a single lane of traffic flanked for most of its length by a lane of parked cars.

Thank you for considering these observations,

Margaret and Patrick Kelly,

- 23 Charleville Road, Rathmines, Dublin 6, D06 V1K5
- 21 March 2024