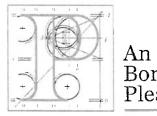
Our Case Number: ABP-316272-23



Bord Pleanála

Ranelagh Village Improvement Group c/o James Wrynn, Coordinator, 27 Chelmsford Road Ranelagh Dublin 6 D06Y638

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

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

Email

To:

An Bord Planala

From:

RVIG (Ranelagh Village Improvement Group)

James Wrynn Co-ordinator RVIG

27 Chelmsford Rd.

Ranelagh Dublin 6 D06 Y638

Mobile: (

Case Number:

ABP-316272-23

Subject:

BusConnects Route 12

Date:

27/03/2024



Submission by RVIG on responses by NTA/BusConnects to our August 2023 submission on the proposals for Route 12.

introduction

RVIG and residents of Ranelagh reiterate support for increased public transport and other non-vehicular modes of movement, particularly walking and cycling. Ranelagh has benefited in this regard from the Luas and dedicated/separated cycle tracks. The movement in this direction should continue but must be balanced by consideration of undue or unnecessary inconvenience for residents and the importance of essential trips by car, particularly by elderly residents who want to access medical and other services. There is a very substantial population of elderly in Ranelagh, as illustrated by the significance of 'Meals on Wheels' and other essential services.

In our earlier submission we raised four crucial points. Since then, the implications of the proposals have become clearer and new further radical proposals have been inserted, of particular concern, the prohibition of certain right and left turns. NTA/BusConnects have published their response to our and other submissions. Below we set out our views on the NTA/BusConnects response and in doing so have amplified our previous submission with further supporting information.

Lack of proper consultation

The response lists various measures implemented as part of what is asserted as having been an adequate consultation process.

As set out in the next section (and elaborated in the Appendix to this Submission), the most marked illustration of the total lack of consultation with many of those affected by the impact of Route 12 was the last-minute insertion of the proposed ban all right-hand turns out of the Beechwood and Belgrave areas (as well as left-hand turns from Chelmsford Rd. & Sallymount Ave.) in the final plan put to an Bord Planála. This is the most egregious example of a token approach to public consultation that almost completely omitted any effort to inform or consult with communities and householders not situated directly on Route 12 but greatly affected by proposals such as the Bus Gate on Lr Rathmines Rd. — with all its knock-on effects in terms of traffic congestion – as well as on the supposed priority of active travel – in surrounding areas.

We reiterate that the only consultation available to residents of Ranelagh was the exhibition on BusConnects in general, rather than Route 12 specifically, that was held in The Hilton Hotel as far back as 2019. This was universally regarded as a farce and pure box-ticking tokenism. The NTA/ BusConnects personnel available at the meeting were unable to provide answers to most queries. In fact, more than one official admitted that the purpose of the meeting was not to provide information but to simply ascertain if local residents had any useful local ideas. And this might have been possible if local people had been given explanations on issues, which attendees assumed was the purpose of the meeting. Unfortunately, the meeting was completely unsuccessful as a consultation exercise.

More importantly, most Ranelagh residents were not even aware of the meeting. This was because NTA confined publicity to people living directly on the route – despite the fact that this proposal has huge implication for residents of all parts of Ranelagh, particularly in terms of accessing Sandford and Clonskeagh roads.

Probably the most damming comment on the consultation process is that RVIG could not find a single example in a 700+page document where any point submitted by a person or group has been incorporated into the current proposals. It may well be that buried in the complexity of the document there is some minor acceptance. But, overall, the almost complete rejection of observations illustrates the bogus nature of the consultation process.

Complexity of documentation

RVIG and others have complained about the complexity of the documentation involved in this planning process. This point is further amplified by the recent NTA Observations document. Every effort seems to have been made to make it as inaccessible as possible. It may seem a small point but the URL, containing 126 characters, must constitute one of the most complex ever designed. It is understandable that an organisation dealing with a very large volume of information needs a systematic approach to organising document

labelling/storage, but it should be user-friendly in the interests of good consultation as well as broader citizen access.

The current document is almost impenetrable, requiring extensive scrolling to access connected/cross referenced passages. A simple device would be to have click to access for cross referenced sections. Again, this seems to be a pattern of frustrating genuine consultation.

Curtailment of left and right turns

The curtailment of right turns into Ranelagh Rd and Sandford Rd. from the Angle, Ashfield Rd and Merton Drive, and left turns from Chelmsford Rd and Sallymount Avenue will cause extraordinary inconvenience and lengthy detours. These restrictions will result in increased road usage by cars because of the complex alternative access routes required. Residents of Merton Drive, Upper and Lower Beechwood Avenue, Edenvale Rd and Mountainview Rd, for example, will have to drive up to an additional 3 Km to access Sandford Rd and Clonskeagh, including UCD. It will also mean longer and more expensive taxi journeys. The NTA itself has acknowledged that the extra detours will create more CO2. This should be considered in the context of a 2.5 KM detour for Rathfarnham residents being deemed unacceptable. Ranelagh residents were not notified or circulated with information leaflets about the proposals. In fact, many of the affected residents have only become aware of the proposal in recent days. The strength of their response in the Appendix to this Submission speaks volumes for the lack of consultation, which is statutorily required.

These curtailments are some of the most significant and detrimental proposals in the final plan for Route 12. The Meals on Wheels programme, for example, operated out of Woodstock Gardens, delivers 23,000 meals per year which involves weaving through the adjacent roads of Ranelagh in a short time window due to the nature of the work. All of these are affected by the restriction on certain right and left turns, but above all by increased traffic volumes. The NTA Observations document argues that these latter restrictions will reduce 'Rat-Running'. This is not a credible argument and has no supporting evidence. Figures are given on changes in projected traffic numbers throughout the document but there is no substantive evidential base for many of these.

RVIG has argued that these proposals are proposed as a solution to a traffic flow problem exclusively, with no regard to broader environmental and social issues and in particular ignore the knock-on effects of residential areas adjacent to Route 12.

Walking and cycling

Encouraging walking generally and specifically to schools is a transport objective. As stated in our August 2023 submission there are seven schools in Ranelagh which, to the greatest extend possible, should be accessed by cycling and walking. But the diversion of through traffic into residential areas of Ranelagh militates against this. Furthermore, there is no indication of how traffic diversions to Ranelagh will affect

the proposed Clonskeagh-City Centre cycleway through Ranelagh. There is a generalised statement in the Observations document that the proposed plan is integrated into overall strategic traffic plans but there is no given evidence of this in relation to the said proposed cycleway.

Traffic flow numbers

In the most recent RVIG submission we queried the general validity of the traffic flow projections for Route 12 and its environs. There is still no valid basis for these and, in scientific terms, they are merely wishful thinking. There is a bias in the projection and assessment of traffic diversions and impacts – on crucial junctions in particular, such as that between Rathmines Rd. and Castlewood Ave. as being of minor significance. We pointed out that the projected reduction in traffic on Rathgar Rd of a drop of 80% appeared to be greatly exaggerated. No evidence was provided in the original document and there has been no response to the issue. As this is the main source of diversions to Ranelagh and adjacent side roads it is effectively the base factor in determining flows of traffic through the Village and its surroundings. Thus, the projected flows through Ranelagh lose any evidential base they might have had. This undermines the proposition of negligible flows through the adjacent residential streets of Ranelagh. We pointed out that the plan projected a very significant increase on Palmerston Rd., of 200%. The consequences of this inevitably increased traffic flows within Ranelagh are not addressed. We also highlighted the capacity issue on Ranelagh Rd. which is also to get an upgrade cycleway, this reducing vehicular space. How is a 40% increase in vehicular volume to be accommodated? Again, there is no response.

Summary

We argue that the consultation process has been profoundly flawed and it is not possible to assert that it is compliant with Arhus, statutory or social requirements for engagement with the affected public. NTA/BusConnects asserts it has provided certain non-statutory required consultation. While we should be grateful for these crumbs from the table, it transpires that these crumbs had no food value.

Many of the issues we raised in our earlier submission were either not addressed or simply resulted in a reassertion of earlier flawed arguments. In addition, very significant changes, e.g., prohibition of certain exit turns, were introduced without any consultation.

Attached is supporting documentation indicating the significance of these points for local Ranelagh residents (including names & addresses) - in particular on the impact of the proposed right and left-turn restrictions.

Document. reflecting the views of almost 200 residents in Ranelagh.

NTA Bus Connect – Severe implications for Ranelagh residents either side of the Ranelagh/ Sandford Road and between Ranelagh/ Sandford Road and the Luas track

Views of residents in Ranelagh

March 2024

Introduction

The NTA have introduced a proposal preventing right hand turns onto the Ranelagh/ Sandford Road at Merton Drive, Ashfield Road and Charleston Road and left hand turns at Sallymount Avenue and Chelmsford Road. The NTA have described this as "may result in inconvenience" which completely understates the impact on people's lives, their ability to access necessary services, access their place of work / study and has real environmental impacts. It is extraordinary that a proposal to reduce the use of cars, could result in residents of Merton Drive, Upper and Lower Beechwood Avenue, Edenvale Road and Mountainview Road having to drive up to an additional 3.5 km to access facilities on the Sandford Road East of Merton Drive. This should be considered in the context that a 2.5 kilometre detour for Rathfarnham residents was deemed unacceptable or feasible for those residents. The residents of Ranelagh (listed in the attachment) support the use of public transport and have benefited greatly from the Luas and cycle routes to and from town. However, we also have to undertake essential trips by car not serviced by public transport and these need to be recognised. Some solutions to the issue are suggested below.

Lack of proper Consultation

While the NTA have publicly consulted on the new bus corridors and with residents along those corridors, they have not engaged with the residents of Ranelagh. Those Ranelagh residents in residential areas did not understand that the proposals would have the effect of substantially blocking them from accessing the Sandford and Clonskeagh roads without extensive detours. We also understand that these proposed bans on turning right were not included in the original proposal and were only added at a late stage which meant that it was not picked up by many residents.

IMPACT

Meals on Wheels and Woodstock community centre

The Woodstock community centre (which provides sheltered housing for elderly residents) also provides over 100 meals on wheels every day (23,000 per year) throughout Ranelagh and from Irishtown up to Rathgar. The meals are delivered by a group of volunteers who already struggle to meet the demands of vulnerable and elderly residents in the Community. Quite simply, with the proposed restrictions, the group will not be able to deliver the same volume of meals due to the additional time and cost (fuel) in delivering the service. Indeed, some of the existing volunteers are concerned that this proposal will substantially prevent the service from operating. The proposal pushes all the cars onto a limited number of roads and this will also have an impact on the traffic on those roads and the ability to move easily around the neighbourhood.

Elderly Neighbourhood

As a well established neighbourhood, Ranelagh has a high proportion of elderly residents who cannot use public transport and require cars, either driving themselves or family or neighbours to access health care and other services. Depending on where they live there will

be a real impediment in easily accessing services and it will also have the impact of forcing them to drive on what will now be very busy roads.

Access to taxis and lifts

For taxis who do not plan to return to town, the additional mileage just to go east / southside may result in taxis not accepting these fares. This may well put young people in a vulnerable position after a night out.

Environmental impacts

As noted above, and acknowledged by the NTA, this proposal will result in permanent substantial detours for residents of certain roads who wish to travel east on the Ranelagh / Sandford roads. This will add to greater fuel consumption and CO2 emissions.

Access to work, college, hospitals and sporting facilities

While supporting the use of public transport, the fact remains that in many cases, public transport does not serve the specific route, or is not suitable for various reasons, as such, there are valid reasons why people need to use their car and need not to be unreasonably impeded in their journey. In particular, access to St Vincents hospital by both patients and by on call medical staff in the neighbourhood is of concern. Access to schools in Donnybrook and Clonskeagh will also be difficult to access. Furthermore the extended driving times are directly opposite to the aims of a 15 minute city which seeks to increase connectivity and access to services.

Solutions

In recognising that improving public transport benefits everyone we consider that there needs to be a solution or compromise that allows the residents still access to the Sandford and Clonskeagh road while achieving the proposed aims of bus connect.

- Make the access to the Right hand turns only attractive to residents. Traffic calming
 measures or detours within the neighbourhood could be introduced that essentially
 make the route unattractive, other than for those who are residents. These would
 also impact residents but would be preferable to a 3km detour.
- 2. Make the right hand turns (and left hand turns from Sallymount Avenue etc), subject to time restrictions.
- 3. Study the actual volume of traffic turning right on each of the roads to determine the volumes and what the actual impact is on the plans for bus connect.

This Document represents the views of the following in Ranelagh.

Ranelagh Community Response CLG CHY 20206371

Rita Purcell and Padraig Collins

Miriam and John Ryan Ayesha and Safiyyah Jeeva

Joan and Gerard Cullen

Rebecca and Padraig Mathews

Yvonne Kelly

Cooleen McCarthy

Catherine Flanigan

Clodagh Canavan and Barry MacMahon

Ciara and Nils Kickham

Nicola Burns-Kirley

32 Beechwood Avenue Upper, Ranelagh

38, Albany Road

15 Beechwood Avenue Lower

15. Park Drive

47, Merton Drive

15 Beechwood Road

4, Albany Road

7, Beechwood Avenue Upper

60, Merton Drive

39, Beechwood Avenue Upper

44, Park Drive

Michael and Sharon Foley
Ann Sheehan and Brain Maye

Fionnuala McAuliffe

Laura Nolan

Pieter Lemstra and Margaux Kenny

Orla and Ciaran O Conluain

Olivia and Olive Meyrick

Peter and Caitriona O'Brien

Olive and Donal Corbett

Michelle and Graham Farrington-Christie

Deirdre and Eugene Hillery

John and Judy Barnes

Maurice Devitt and Teresa Elford

Aine Leacy

Joe Shortall

John Barnes

Sheila Stephens

Joanne Barrett

Mary Doherty

Teri Kiberd

Clare and Gerry Looby

Philip and Veronica Daly

Penny Dewar, Jacob and Josh Kennedy

Aisling Fleming

Tom and Margaret Bluett

John and Maria Gageby

Michael Smith and Elaine Greene

Sunniva and Declan Kelly Barrett

Carol Louthe

Paul and Dairine Clinton

Ann Boyle

Nora and Alan Palmer

Pat Galvin and Ester McCarthy

Trish and Aidan Mathews

Gerry and Geraldine Grenham

Roger and Ann Costello

Ann Herlihy and Donal Brosahan

Joan and Gerard Cullen

Annemarie McRedmond

Kevin and Muriel Thornton

Djamel Benziane and Ann Cooney

Majella O'Regan

Patrick Collinson and Neil Murphy

Brian Butler and Muriel Moroney

Puala Guerin and Paul O'Callaghan

Maire Nic Fhinn

Freida Ryan

10, Mountain View Road

57, Mountainview Road.

2, Albany Road

52. Beechwood Avenue Lower

13, Merton Drive

6, Merton Drive

21 Park Drive

20 Edenvale Road

22 Merton Drive

15, Frankfort Avenue

9. Albany Road

59 Edenvale road

40 Edenvale Road.

70, Beechwood Avenue Upper

15, Merton Drive

59 Edenvale Road

81, Ashfield Road

31, Edenvale Road

49 Beechwood Avenue Upper

31 Edenvale Road

27 Beechwood Avenue upper

Merton Drive

25 Anna Villa

20 Albany Road

13. Edenvale Road

18. Cullenswood Gardens

61 Edenvale Road

44 Palmerston Gardens

48 Beechwood Avenue Upper

Beechwood Avenue Upper

54 Beechwood Avenue Lower

22 Mountain View Road

65 Edenvale Road

16. Mountainview Road

18, Edenvale Road

27, Edenvale Road

71 Moyne Road

15 Park Drive

Ashfield Road

63 Movne Road

9 Edenvale Road

16, Moyne Road

59 Beechwood Avenue Upper

Beechwood Avenue Upper

?

32, Albany Road

29 Upper Beechwood Avenue

JP and Laura Montgomery

Conor Kelly and Carmen Lopez

Ciara and Paul Foxton

Mary Pierse

Diarmaid and Louise O'Corrbui

Ross and Keelin Dawson

John Pearson

Fiona and Philip Meagher

Aoife MacCarthy and Stephen Dowling

Gary and Anne Valentine

Andrew and AnnMarie Dunne

Rose and George McAuley

Eimear McCarthy

Mary and David Diggins

Harry and Laura Colley

Anthony and Sheelagh Gallagher

Sinead and Kevin Daunt

Killian and Mary Lannen

Dee and Darragh Buckley

Jenny Fee

Margaret and Stephen Masterson

Siobhan Clarke and Padraic Moran

Aoife and Tony O Riordan

Jennifer Cunningham & Tom Eschmann

Simone and Colm Brady

Mairead and Damien Corr

Rory McGinley and Orla Ruane

Teresa Elford and Maurice Devitt

Marcus and Paula Thomas

Patrick Campion and Jean Gallagher

Deirdre Dargan

Mary Doyle and Michael O Donovan

Des, Siobhan and Hannah Lennon

Tony and Deirdre Connellan

Rachel Murray and Ronan Nulty

Angela Fulton

Mark McKenna and Maria Olmedo

Nora and Alan Palmer

Derek and Annica White

Susan and Steve Iredale

Fiona and Martin O Donohoe

Emma Tuohy and Peter McInerney

Andrew Simpson

John and Sheila Lynch

Francis and Claire O Keeffe

Fionnuala and Turlough Donnelly

Diarmuid O Se and Patricia Taylor

4 Beechwood Road

47 Park Drive

9 Merton Drive

20 Mountainview Road

17 Cowper Drive

17, Anna Villa

4 Anna Villa

74 Beechwood Avenue Lower

3 Cowper Drive

36 Park Drive

1 Tudor Road

57 Anna Villa

11 Edenvale Road

33 Park Drive

46 Park Drive

29 Beechwood Avenue Upper

34 Mountain View Road

35 Park Drive

39 Anna Villa

39 Merton Drive

35 Merton Drive

27 Merton Drive

40 Park Drive

12 Merton Drive

42 Merton Drive

40 Merton Drive

24 Merton Drive

40 Edenvale Road

32 Merton Drive

Beechwood Avenue Upper

18 Albany Road

14 Albany Road

17 Edenvale Road

4 Cowper Gardens

25 Merton Drive

Tudor Road

22 Anna Villa

22 Mountain View Road

41 Mountain View Road

5 Cowper Gardens

41 Park Drive

24 Mountain View Road

84 Ranelagh Road

Killeen Road

41 Dunville Avenue

2 Oakley Park

1 Merton Drive

Olivia and Colm O Neill Gerry and Anne Dollard Dan and Dee Herbert Elaine and Niall McGirr

Mark Byrne

Dermot and Paula O Doherty Breifne O Reilly and Eavan Doyle

Annmarie and Jonathan Blennerhassett

Phil Coll

Denise Cavanagh

Gerri Skehan and Gerry Griffin

Frank Long

Anne Marie McDaid Conor and Janey Cullen

Eleanor Dunican and Andrew Manies

Marcel and Lisa Klein Cathal and Triona Gibson Colin and Marie Delaney Liam and Helen Bradley

Louise Halpin

Brian and Jennifer Cooney

Carole O Donnell Miriam Ahern

Joe, Janet and Maeve O'Brien

Helen Arnold

Shane and Dee O'Brien

Damien Maloney

Paul Bushe Mary Byrne

Ann and Liam O'Hagan

Caitriona Fisher and Rebecca Graham

Bernard Ryan

Fred Schelbaum and Fergal Scott

Richard and Helen Rutledge

Maura and Cyril Doyle

Caitriona and Noel Gaughran

Terry and Tony O'Dwyer

June Linnane Maeve Valentine

Hazel Piggot and Diarmaid Moran Christine Kennard and Brendan Cleary

Neil and Frances Murphy

Mary and David Gill Rhona O'Connor

Geraldine Magnier and Aidan Connolly

John and Grace Healy

Mark Haverty and Mairead Byrne

26 Merton Drive

62 Beechwood Avenue Upper

Cullenswood Gardens

18 Park Drive

17 Park Drive

16 Beechwood Avenue Upper

51 Edenvale Road

6 Anna Villa

34 Park Drive

41 Edenvale Road

Tudor Road

27 Beechwood Avenue Lower

Annesley Gardens

1 Oakley Park

8 Anna Villa

67 Beechwood Avenue Lower

25 Park Drive

33 Dunville Avenue

23 Edenvale Road

43 Dunville Avenue

41 Merton Drive

23 Albany Road

77 Beechwood Avenue Lower

12 Albany Road

14 Tudor Road

44 Mountain View Road

46 Merton Drive

19 Anna Villa

57 Anna Villa

Tudor Road

11 Albany Road

Merton Drive

1 Edenvale Road

Cowper Gardens

50 Beechwood Avenue Upper

36 Beechwood Avenue Upper

8 Beechwood Avenue

28 Anneslev Park

22 Cullenswood Garden

28 Park Drive

10 Edenvale Road

32 Tudar Road

41 Beechwood Avenue Lower

61 Ranelagh Road

53 Edenvale Road

8 Tudor Road

Elmpark Avenue

Conor and Jennifer Mahon

Fionnuala Ni Chasaide

Joanne and Darren Whelan

Brian Murray and Aideen Loftus

Agnieszka and Naeem Bismilla

Andrew Woolfe

Anne and Lance Graham

Frances Stafford

Pat and Rita Garvey

Brian and Orla Daly

Ivan and Anne Duncan

Peter and Hilary Carey

Dominic Barnes

Sheila McHugh

Eugene and Claire McLoughlin

Pierce and Pippa Casey

Andrew Murtagh

Brian McAnallen

Mary Leonard and Frank O'Connor

Paddy and Una Adams

Aisling Foley Nolan

Katrice Sheridan

34 Merton Drive

Merton Drive

Anna Villa

Mountain View Road

46 Edenvale Road

19 Albany Road

23 Park Drive

31 Beechwood Avenue Upper

Park Drive

Cowper Drive

Park Drive

31 Tudor Road

59 Edenvale

49 Dunville Avenue

75 Beechwood Avenue Lower

31 Mountain View Road

30 Tudor Road

15A Park Drive

67, Moyne Road

36 Merton Drive

38, Merton Drine

50, Dunville Avenue

Conor and Jennifer Mahon Fionnuala Ni Chasaide Joanne and Darren Whelan Brian Murray and Aideen Loftus

Agnieszka and Naeem Bismilla

Andrew Woolfe

Anne and Lance Graham

Frances Stafford
Pat and Rita Garvey
Brian and Orla Daly
Ivan and Anne Duncan

Peter and Hilary Carey

Dominic Barnes Sheila McHugh

Eugene and Claire McLoughlin

Pierce and Pippa Casey

Andrew Murtagh Brian McAnallen

Mary Leonard and Frank O'Connor

Paddy and Una Adams Aisling Foley Nolan

Katrice Sheridan

34 Merton Drive Merton Drive

Anna Villa

Mountain View Road

46 Edenvale Road

19 Albany Road

23 Park Drive

31 Beechwood Avenue Upper

Park Drive

Cowper Drive

Park Drive

31 Tudor Road

59 Edenvale

49 Dunville Avenue

75 Beechwood Avenue Lower

31 Mountain View Road

30 Tudor Road

15A Park Drive

67, Moyne Road

36 Merton Drive

38, Merton Drine

50, Dunville Avenue

RVIG -Ashfield Road/ Ashfield Avenue/Mornington Road

27 Ashfield Road D06FN53
27 Ashfield Road D06FN53
27 Sandford Road
47 Ashfield Rd, D06 VW77
41 Ashfield Road
44 Ashfield Road
44 Ashfield Road
28 Ashfield Road
63 Ashfield Road, Ranelagh. D06 A563
91 Ashfield Road Ranelagh
11 Ashfield Road
11 Ashfield Road
3 Ashfield Road
33 Ashfield Road
3 Mornington Road
32 Mornington Road
35 Mornington Road
17 Mornington Road
19 Ashfield Avenue
42 Killeen Road
20 Annesley Gardens
38 Mornington Road