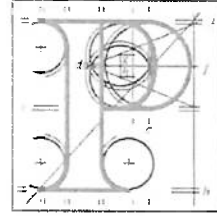


**Our Case Number:** ABP-316272-23



**An  
Bord  
Pleanála**

Senator Michael McDowell  
Seanad Éireann  
Leinster House  
Kildare Street  
Dublin 2

**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
Glaio 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

## Kevin McGettigan

---

**From:** Eimear Reilly  
**Sent:** Wednesday 10 April 2024 09:22  
**To:** Kevin McGettigan  
**Subject:** FW: Submission re: Case Reference No. ABP-316272-23  
**Attachments:** Bus Connects revised.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** LAPS <laps@pleanala.ie>  
**Sent:** Tuesday, April 2, 2024 10:09 AM  
**To:** Eimear Reilly <e.reilly@pleanala.ie>  
**Subject:** FW: Submission re: Case Reference No. ABP-316272-23

---

**From:** Samantha Long [REDACTED]  
**Sent:** Thursday, March 28, 2024 4:52 PM  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** RE: Submission re: Case Reference No. ABP-316272-23

**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.

Dear Ms Reilly,

Please find attached a revised submission due to a typographical error in the original version.

Many thanks,

Samantha

Samantha Long

Secretarial Assistant to Senator Michael McDowell  
Administrator, Seanad Independent Group

Seanad Éireann  
Leinster House  
Kildare Street  
Dublin 2

01 6183466

  
[www.michaelmcdowell.ie](http://www.michaelmcdowell.ie)

Twitter @senatormcdowell

---

**From:** Michael McDowell

**Sent:** 28 March 2024 16:37

**To:** [laps@pleanala.ie](mailto:laps@pleanala.ie)

**Subject:** Submission re: Case Reference No. ABP-316272-23

Dear Ms. Reilly,

Please find attached a submission re: Case Reference No. ABP-316272-23 by Senator Michael McDowell.


You might kindly confirm receipt in due course.

Yours sincerely,

Samantha Long

Secretarial Assistant to Senator Michael McDowell  
Administrator, Seanad Independent Group

Seanad Éireann  
Leinster House  
Kildare Street  
Dublin 2

01 6183466  


[www.michaelmcdowell.ie](http://www.michaelmcdowell.ie)

Twitter @senatormcdowell

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SENATOR  
MICHAEL MCDOWELL

**Re: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme**

**Submission by Senator Michael McDowell**

On 14<sup>th</sup> August 2023 I made a submission to An Bord Pleanála in connection with the NTA Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme. I have been notified that the Board has decided to determine the application without an oral hearing.

I deeply regret that Board decision which I consider to be inappropriate bearing in mind the consequences of the development in question.

I note that I have now been invited to make a further submission in response to the NTA submission dated 20th December 2023 and that the deadline for receipt of this submission is today at 5.30pm.

**Overall comment**

The central issue which underlies what will undoubtedly become a major public controversy is the redesignation and reassignment of road space on Rathgar Road and Lower Rathmines Road. These routes are vital traffic arteries for all forms of vehicular traffic coming from a broad swathe of suburban Dublin from Terenure to Darty and from suburbs inside and outside that arc. They are also roads which are vital parts of local communities.

There has been a fundamental failure by NTA to strike a sensible balance between the needs of cycle traffic and general traffic along the route, and a false ideological prioritisation of the requirement for cycle lanes as opposed to general vehicular traffic.

Rathgar Road is wholly suitable for use as a four lane two-way traffic artery including dedicated bus lanes. With modest modifications to the roadway and pavements two cycle lanes could also be provided. The diversion of inbound general traffic to

Highfield Road is totally unnecessary and will destroy the amenity of a quiet residential living space.

Lower Rathmines Road poses some difficulties, particularly in the stretch between Castlewood Avenue junction and Upper Rathmines Road where the carriageway is very narrow. Alternative cycle routes could be provided by dedicating some of the space on Castlewood Park for special cycle lanes (by using the laneway to the North of Castlewood Avenue connecting Castlewood Avenue to Gullistan Cottages and Mount Pleasant Avenue, a safe and segregated cycle route could be provided for cycle traffic inwards towards the Grand canal and the inner city). Likewise a dedicated cycle route could be opened from Charleville Road to Leinster Square and towards St. Mary's College.

There is absolutely no need for a bus gate on Lower Rathmines Road. The existing route from Lower Rathmines Road to South Richmond Street is adequate with proper traffic management for increased bus use.

#### **Knock-on consequences of the Lower Rathmines Road bus gate**

The proposed bus gate on Lower Rathmines Road will have major knock-on consequences for the Ranelagh area.

In particular, general traffic from the outer southern suburbs on an arc from Milltown to Terenure will be restricted when accessing or crossing the city centre using the Ranelagh Road and Harold's Cross Road routes.

The roadway from Rathmines via Castlewood Avenue, Belgrave Square North, Charleston Road, and the portion of The Triangle in Ranelagh known as Cullenswood Road is already heavily congested, particularly in Ranelagh where it accommodates a taxi rank, retail delivery space and a major traffic junction.

That roadway is the route of the S2 bus service recently established. The route is always busy being the entrance to the Swan Centre carparking and delivery facility. The part of Castlewood Avenue nearest to Rathmines Road is very narrow for use as a bus route and is dangerous for cyclists as things stand. The roadway is frequently congested and is grossly inadequate for present traffic volumes. Charleston Road is now a congested and narrow road space serving traffic from Palmerston Road, Dartry, Milltown and Churchtown as well as the S2 bus service. Much of this traffic is radial east-west traffic using Cullenswood Road and Chelmsford Road as an inner city radial route including the S2 bus service.

From Cullenswood Road to Charlemont St. bridge there is already major peak time traffic congestion along Ranelagh and Ranelagh Road. Commercial deliveries and retail activity from Cullenswood Road to Ranelagh Road is very heavy as things stand.

I reject any suggestion in the December submission by the NTA which appears to understate the inevitable traffic chaos that will arise from diverting city bound

general traffic from Rathmines Road down Charleston to the Triangle in Ranelagh. I live on Charleston Road.

I note that it is also proposed to introduce a "no right hand turn" for "general traffic" (not including the S2 bus route, presumably) at the Triangle in Ranelagh so as to require all radial west-east traffic at present using Charleston Road and Chelmsford road to be diverted onto Ranelagh and Ranelagh Road.

It is also proposed to prohibit right hand turns to traffic from Ashfield Road to Ranelagh Road and from Merton Drive to Ranelagh Road (this should be Sandford Road) effectively requiring all general traffic to turn left on Ranelagh Road and proceed towards the city centre. This road space is already massively congested and is a major bus route. It is a retail area requiring deliveries and pick-ups from 7 in the morning until restaurants closing time.

I don't normally like to engage in hyperbole but the combined effect of all of the proposed traffic restrictions in the area goes beyond planned chaos and into the realm of total madness. Nearly all of the wholly unjust proposals for Ranelagh and Sandford Road could be easily avoided by dispensing with the bus gate on Lower Rathmines Road.

While I note various graphs and tables have been submitted by the NTA, I cannot believe that anyone with local knowledge could suggest for one moment that the inevitable consequence of the Lower Rathmines Road bus gate is justified having regard to existing and massive worsening traffic congestion in the Ranelagh area if these proposals are proceeded with. I entirely reject the suggestion that the knock-on traffic consequences of the Lower Rathmines bus gate can be described as "negative, slight and long term" nor do I accept that increased bus capacity is in any way sufficient to cater for general traffic volumes as described on page 206 of the NTA submission of December 2023.

I regard the suggestion that the effects on Charleston Road/Cullenswood Road would be "negligible" is so fanciful as to be dishonest.

In relation to air quality, I note that the present government proposes a massive change in private and commercial vehicles to electric vehicles to take place with an outright ban on new internal combustion vehicles from 2030. Unless that policy has been abandoned, the air quality projections for a scheme commencing in 2028 are frankly ridiculous.

The series of traffic diversion measures set out at page 216 of the NTA document of December 2023 are wholly unnecessary and will lead to traffic congestion in Ranelagh.

The statement that these measures "may result in an inconvenience for those living in the area" is possibly one of the greatest understatements made by the NTA in recent years. These measures will not merely affect local residents, they will

concentrate traffic from far further afield seeking to travel from west to east on the Triangle in Ranelagh and on the massively congested Milltown Road/Clonskeagh road junction.

It is clear to me that the underlying philosophy is the mass reduction of vehicle mobility in Dublin.

Increased availability of buses on a small selection of routes in no way compensates for the damage that will be done. And, as electric vehicles become the norm, there are no compensations for the inevitable reduction in people's capacity to move across, around and into the city.

I attach as an Appendix representations that have been made to me by local residents who will be affected by the proposed consequential restrictions in respect of traffic on Ranelagh and on Sandford Road.

I would add that the public awareness of these knock-on effects have only now been genuinely understood in adjoining areas but I have no doubt that any such proposals would attract outrage and active opposition from residents of greater areas in Dublin 6.

#### **Judicial Review**

These proposals (which flow from the unwarranted proposal to establish a bus gate on Lower Rathmines Road) are grotesque. They represent a complete failure to confront their own inevitable consequences. The technical data relied on by NTA to support such utterly unjust proposals is beyond the capability of ordinary residents and retailers to examine in detail. An Bord Pleanála has to apply common sense and act judicially and refuse to accept proposals which on their face seem completely disproportionate, unwarranted and harmful.

Failure to address these issues and concerns will in all probability result in Judicial Review proceedings.

Finally, I want to remind the board that the NTA has previously tried to sever all connectivity between the affected areas in Ranelagh by its ill-considered proposal to close all traffic on the Green Luas line at Dunville Avenue. Only after massive protest and community mobilisation was that arrogant proposal avoided. These proposals are equally high-handed and arrogant requiring hundreds of households to make traffic decisions which are wholly unreasonable and amount to far worse than the "inconvenience" admitted by NTA. These communities have had enough.

Little did they suspect that the Templeogue-Rathfarnham Bus Corridor scheme would by stealth attempt to mitigate its worst deficiencies by introducing wholly unreasonable traffic management sticking plaster solutions on their communities. They deserve better.

Meaningful public consultation as a matter of fairness and law required the NTA to consult with the affected communities and to publish and communicate the proposals to those likely to have an interest in them. The Board decision to dispense with oral hearing and to confine submissions at this stage to those who made earlier submissions ignores the fact that the great majority of people in the affected communities were wholly unaware of the implications of a distant bus corridor for them.

Yours sincerely



Senator Michael McDowell

Sent via email 28<sup>th</sup> March 2024



## Appendix

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

March 2024

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#### **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.

1. 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 residents and community groups.**

Ranelagh Community Response CLG CHY 20206371

Rita Purcell and Pdraig Collins

32 Beechwood Avenue Upper, Ranelagh

Miriam and John Ryan	38, Albany Road
Ayesha and Safiyyah Jeeva	15 Beechwood Avenue Lower
Joan and Gerard Cullen	15, Park Drive
Rebecca and Pdraig Mathews	47, Merton Drive
Yvonne Kelly	15 Beechwood Road
Cooleen McCarthy	4, Albany Road
Catherine Flanigan	7, Beechwood Avenue Upper
Clodagh Canavan and Barry MacMahon	60, Merton Drive
Ciara and Nils Kickham	39, Beechwood Avenue Upper
Nicola Burns-Kirley	44, Park Drive
Michael and Sharon Foley	10, Mountain View Road
Ann Sheehan and Brain Maye	57, Mountainview Road.
Fionnuala McAuliffe	2, Albany Road
Laura Nolan	52, Beechwood Avenue Lower
Pieter Lemstra and Margaux Kenny	13, Merton Drive
Orla and Ciaran O Conluain	6, Merton Drive
Olivia and Olive Meyrick	21 Park Drive
Peter and Caitriona O'Brien	20 Edenvale Road.
Olive and Donal Corbett	22 Merton Drive
Michelle and Graham Farrington-Christie	15, Frankfort Avenue
Deirdre and Eugene Hillery	9, Albany Road
John and Judy Barnes	59 Edenvale road
Maurice Devitt and Teresa Elford	40 Edenvale Road.
Aine Leacy	70, Beechwood Avenue Upper
Joe Shortall	15, Merton Drive
John Barnes	59 Edenvale Road
Sheila Stephens	81, Aisfield Road
Joanne Barrett	31, Edenvale Road
Mary Doherty	49 Beechwood Avenue Upper
Teri Kiberd	31 Edenvale Road
Clare and Gerry Looby	27 Beechwood Avenue upper

Philip and Veronica Daly	Merton Drive
Penny Dewar, Jacob and Josh Kennedy	25 Anna Villa
Aisling Fleming	20 Albany Road
Tom and Margaret Bluett	13, Edenvale Road
John and Maria Gageby	18, Cullenswood Gardens
Michael Smith and Elaine Greene	61 Edenvale Road
Sunniva and Declan Kelly Barrett	44 Palmerston Gardens
Carol Louthe	48 Beechwood Avenue Upper
Paul and Dairine Clinton	Beechwood Avenue Upper
Ann Boyle	54 Beechwood Avenue Lower
Nora and Alan Palmer	22 Mountain View Road
Pat Galvin and Ester McCarthy	65 Edenvale Road
Trish and Aidan Mathews	16, Mountainview Road
Gerry and Geraldine Grenham	18, Edenvale Road
Roger and Ann Costello	27, Edenvale Road
Ann Herlihy and Donal Brosahan	71 Moyne Road
Joan and Gerard Cullen	15 Park Drive
Annemarie McRedmond	Ashfield Road
Kevin and Muriel Thornton	63 Moyne Road
Djamel Benziane and Ann Cooney	9 Edenvale Road
Majella O'Regan	16, Moyne Road
Patrick Collinson and Neil Murphy	59 Beechwood Avenue Upper
Brian Butler and Muriel Moroney	Beechwood Avenue Upper
Puála Guerin and Paul O'Callaghan	?
Maire Nic Fhinn	32, Albany Road
Freida Ryan	29 Upper Beechwood Avenue
JP and Laura Montgomery	4 Beechwood Road
Conor Kelly and Carmen Lopez	47 Park Drive
Ciara and Paul Foxton	9 Merton Drive
Mary Pierse	20 Mountainview Road
Diarmuid and Louise O'Corrbui	17 Cowper Drive

Ross and Keelin Dawson	17, Anna Villa
John Pearson	4 Anna Villa
Fiona and Philip Meagher	74 Beechwood Avenue Lower
Aoife MacCarthy and Stephen Dowling	3 Cowper Drive
Gary and Anne Valentine	36 Park Drive
Andrew and AnnMarie Dunne	1 Tudor Road
Rose and George McAuley	57 Anna Villa
Eimear McCarthy	11 Edenvale Road
Mary and David Diggins	33 Park Drive
Harry and Laura Colley	46 Park Drive
Anthony and Sheelagh Gallagher	29 Beechwood Avenue Upper
Sinead and Kevin Daunt	34 Mountain View Road
Killian and Mary Lannen	35 Park Drive
Dee and Darragh Buckley	39 Anna Villa
Jenny Fee	39 Merton Drive
Margaret and Stephen Masterson	35 Merton Drive
Siobhan Clarke and Padraic Moran	27 Merton Drive
Aoife and Tony O Riordan	40 Park Drive
Jennifer Cunningham & Tom Eschmann	12 Merton Drive
Simone and Colm Brady	42 Merton Drive
Mairead and Damien Corr	40 Merton Drive
Rory McGinley and Orla Ruane	24 Merton Drive
Teresa Eford and Maurice Devitt	40 Edenvale Road
Marcus and Paula Thomas	32 Merton Drive
Patrick Campion and Jean Gallagher	Beechwood Avenue Upper
Deirdre Dargan	18 Albany Road
Mary Doyle and Michael O Donovan	14 Albany Road
Des, Siobhan and Hannah Lennon	17 Edenvale Road
Tony and Deirdre Connellan	4 Cowper Gardens
Rachel Murray and Ronan Nulty	25 Merton Drive
Angela Fulton	Tudor Road

Mark McKenna and Maria Olmedo	22 Anna Villa
Nora and Alan Palmer	22 Mountain View Road
Derek and Annica White	41 Mountain View Road
Susan and Steve Iredale	5 Cowper Gardens
Fiona and Martin O Donohoe	41 Park Drive
Emma Tuohy and Peter McInerney	24 Mountain View Road
Andrew Simpson	84 Ranelagh Road
John and Sheila Lynch	Killeen Road
Francis and Claire O Keefe	41 Dunville Avenue
Fionnuala and Turlough Donnelly	2 Oakley Park
Diarmuid O Se and Patricia Taylor	1 Merton Drive
Olivia and Colm O Neill	26 Merton Drive
Gerry and Anne Dollard	62 Beechwood Avenue Upper
Dan and Dee Herbert	Cullenswood Gardens
Elaine and Niall McGirr	18 Park Drive
Mark Byrne	17 Park Drive
Dermot and Paula O Doherty	16 Beechwood Avenue Upper
Breifne O Reilly and Eavan Doyle	51 Edenvale Road
Annmarie and Jonathan Blennerhassett	6 Anna Villa
Phil Coll	34 Park Drive
Denise Cavanagh	41 Edenvale Road
Gerri Skehan and Gerry Griffin	Tudor Road
Frank Long	27 Beechwood Avenue Lower
Anne Marie McDaid	Annesley Gardens
Conor and Janey Cullen	1 Oakley Park
Eleanor Dunican and Andrew Manies	8 Anna Villa
Marcel and Lisa Klein	67 Beechwood Avenue Lower
Cathal and Triona Gibson	25 Park Drive
Colin and Marie Delaney	33 Dunville Avenue
Liam and Helen Bradley	23 Edenvale Road
Louise Halpin	43 Dunville Avenue

Brian and Jennifer Cooney	41 Merton Drive
Carole O'Donnell	23 Albany Road
Miriam Ahern	77 Beechwood Avenue Lower
Joe, Janet and Maeve O'Brien	12 Albany Road
Helen Arnold	14 Tudor Road
Shane and Dee O'Brien	44 Mountain View Road
Damien Maloney	46 Merton Drive
Paul Bushe	19 Anna Villa
Mary Byrne	57 Anna Villa
Ann and Liam Hagan	Tudor Road
Caitriona Fisher and Rebecca Graham	11 Albany Road
Bernard Ryan	Merton Drive
Fred Schelbaum and Fergal Scott	1 Edenvale Road
Richard and Helen Rutledge	Cowper Gardens
Maura and Cyril Doyle	50 Beechwood Avenue Upper
Caitriona and Noel Gaughran	36 Beechwood Avenue Upper
Terry and Tony O'Dwyer	8 Beechwood Avenue
June Linnane	28 Annesley Park
Maeve Valentine	22 Cullenswood Garden
Hazel Piggot and Diarmaid Moran	28 Park Drive
Christine Kennard and Brendan Cleary	10 Edenvale Road
Neill and Frances Murphy	32 Tudor Road
Mary and David Gill	41 Beechwood Avenue Lower
Rhona O'Connor	61 Ranelagh Roady
Geraldine Magnier and Aidan Connolly	53 Edenvale Road
John and Grace Healy	8 Tudor Road
Mark Haverty and Mairead Byrne	Elmpark Avenue
Conor and Jenifer Mahon	34 Merton Drive
Fionnuata Ni Chasaide	Merton Drive
Joanne and Darren Whelan	Anna Villa
Brian Murray and Aideen Loftus	Mountain View Road

Agnieszka and Naeem Bismilla

46 Edenvale Road



## Kevin McGettigan

---

**From:** Eimear Reilly  
**Sent:** Wednesday 10 April 2024 09:22  
**To:** Kevin McGettigan  
**Subject:** FW: Submission re: Case Reference No. ABP-316272-23  
**Attachments:** Senator McDowell submission 28 March 2024.pdf

---

**From:** LAPS <laps@pleanala.ie>  
**Sent:** Tuesday, April 2, 2024 10:09 AM  
**To:** Eimear Reilly <e.reilly@pleanala.ie>  
**Subject:** FW: Submission re: Case Reference No. ABP-316272-23

---

**From:** Michael McDowell <[Michael.McDowell@oireachtas.ie](mailto:Michael.McDowell@oireachtas.ie)>  
**Sent:** Thursday, March 28, 2024 4:37 PM  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** Submission re: Case Reference No. ABP-316272-23

**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.

Dear Ms. Reilly,

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You might kindly confirm receipt in due course.

Yours sincerely,

Samantha Long

Secretarial Assistant to Senator Michael McDowell  
Administrator, Seanad Independent Group

Seanad Éireann  
Leinster House  
Kildare Street  
Dublin 2

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086 2331489

[www.michaelmcdowell.ie](http://www.michaelmcdowell.ie)

Twitter @senatormcdowell

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Oireachtas email policy and disclaimer. [oireachtas.ie/en/email-policy/](http://oireachtas.ie/en/email-policy/)



SENATOR  
**MICHAEL McDOWELL**

**Re: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme**

**Submission by Senator Michael McDowell**

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In particular, general traffic from the outer southern suburbs on an arc from Milltown to Terenure will be restricted when accessing or crossing the city centre using the Ranelagh Road and Harold's Cross Road routes.

The roadway from Rathmines via Castlewood Avenue, Belgrave Square North, Charleston Road, and the portion of The Triangle in Ranelagh known as Cullenswood Road is already heavily congested, particularly in Ranelagh where it accommodates a taxi rank, retail delivery space and a major traffic junction.

That roadway is the route of the S2 bus service recently established. The route is always busy being the entrance to the Swan Centre carparking and delivery facility. The part of Castlewood Avenue nearest to Rathmines Road is very narrow for use as a bus route and is dangerous for cyclists as things stand. The roadway is frequently congested and is grossly inadequate for present traffic volumes. Charleston Road is now a congested and narrow road space serving traffic from Palmerston Road, Dartry, Milltown and Churchtown as well as the S2 bus service. Much of this traffic is radial east-west traffic using Cullenswood Road and Chelmsford Road as an inner city radial route including the S2 bus service.

From Cullenswood Road to Charlemont St. bridge there is already major peak time traffic congestion along Ranelagh and Ranelagh Road. Commercial deliveries and retail activity from Cullenswood Road to Ranelagh Road is very heavy as things stand.

I reject any suggestion in the December submission by the NTA which appears to understate the inevitable traffic chaos that will arise from diverting city bound

general traffic from Rathmines Road down Charleston to the Triangle in Ranelagh. I live on Charleston Road.

I note that it is also proposed to introduce a "no right hand turn" for "general traffic" (not including the S2 bus route, presumably) at the Triangle in Ranelagh so as to require all radial west-east traffic at present using Charleston Road and Chelmsford road to be diverted onto Ranelagh and Ranelagh Road.

It is also proposed to prohibit right hand turns to traffic from Ashfield Road to Ranelagh Road and from Merton Drive to Ranelagh Road (this should be Sandford Road) effectively requiring all general traffic to turn left on Ranelagh Road and proceed towards the city centre. This road space is already massively congested and is a major bus route. It is a retail area requiring deliveries and pick-ups from 7 in the morning until restaurants closing time.

I don't normally like to engage in hyperbole but the combined effect of all of the proposed traffic restrictions in the area goes beyond planned chaos and into the realm of total madness. Nearly all of the wholly unjust proposals for Ranelagh and Sandford Road could be easily avoided by dispensing with the bus gate on Lower Rathmines Road.

While I note various graphs and tables have been submitted by the NTA, I cannot believe that anyone with local knowledge could suggest for one moment that the inevitable consequence of the Lower Rathmines Road bus gate is justified having regard to existing and massive worsening traffic congestion in the Ranelagh area if these proposals are proceeded with. I entirely reject the suggestion that the knock-on traffic consequences of the Lower Rathmines bus gate can be described as "negative, slight and long term" nor do I accept that increased bus capacity is in any way sufficient to cater for general traffic volumes as described on page 206 of the NTA submission of December 2023.

I regard the suggestion that the effects on Charleston Road/Cullenswood Road would be "negligible" is so fanciful as to be dishonest.

In relation to air quality, I note that the present government proposes a massive change in private and commercial vehicles to electric vehicles to take place with an outright ban on new internal combustion vehicles from 2030. Unless that policy has been abandoned, the air quality projections for a scheme commencing in 2028 are frankly ridiculous.

The series of traffic diversion measures set out at page 216 of the NTA document of December 2023 are wholly unnecessary and will lead to traffic congestion in Ranelagh.

The statement that these measures "may result in inconvenience for those living in the area and for residents of the xxx roads" is possibly one of the greatest understatements made by the NTA in recent years. These measures will not merely

affect local residents, they will concentrate traffic from far further afield seeking to travel from west to east on the Triangle in Ranelagh and on the massively congested Milltown Road/Clonskeagh road junction.

It is clear to me that the underlying philosophy is the mass reduction of vehicle mobility in Dublin.

Increased availability of buses on a small selection of routes in no way compensates for the damage that will be done. And, as electric vehicles become the norm, there are no compensations for the inevitable reduction in people's capacity to move across, around and into the city.

I attach as an Appendix representations that have been made to me by local residents who will be affected by the proposed consequential restrictions in respect of traffic on Ranelagh and on Sandford Road.

I would add that the public awareness of these knock-on effects have only now been genuinely understood in adjoining areas but I have no doubt that any such proposals would attract outrage and active opposition from residents of greater areas in Dublin 6.

#### **Judicial Review**

These proposals (which flow from the unwarranted proposal to establish a bus gate on Lower Rathmines Road) are grotesque. They represent a complete failure to confront their own inevitable consequences. The technical data relied on by NTA to support such utterly unjust proposals is beyond the capability of ordinary residents and retailers to examine in detail. An Bord Pleanála has to apply common sense and act judicially and refuse to accept proposals which on their face seem completely disproportionate, unwarranted and harmful.

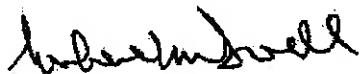
Failure to address these issues and concerns will in all probability result in Judicial Review proceedings.

Finally, I want to remind the board that the NTA has previously tried to sever all connectivity between the affected areas in Ranelagh by its ill-considered proposal to close all traffic on the Green Luas line at Dunville Avenue. Only after massive protest and community mobilisation was that arrogant proposal avoided. These proposals are equally high-handed and arrogant requiring hundreds of households to make traffic decisions which are wholly unreasonable and amount to far worse than the "inconvenience" admitted by NTA. These communities have had enough.

Little did they suspect that the Templeogue-Rathfarnham Bus Corridor scheme would by stealth attempt to mitigate its worst deficiencies by introducing wholly unreasonable traffic management sticking plaster solutions on their communities. They deserve better.

Meaningful public consultation as a matter of fairness and law required the NTA to consult with the affected communities and to publish and communicate the proposals to those likely to have an interest in them. The Board decision to dispense with oral hearing and to confine submissions at this stage to those who made earlier submissions ignores the fact that the great majority of people in the affected communities were wholly unaware of the implications of a distant bus corridor for them.

Yours sincerely



**Senator Michael McDowell**

**Sent via email 28<sup>th</sup> March 2024**

## Appendix

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

**March 2024**

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#### **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**

##### **Meats 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.

1. 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 residents and community groups.**

Ranelagh Community Response CLG CHY 20206371

Rita Purcell and Pdraig Collins

32 Beechwood Avenue Upper, Ranelagh

Miriam and John Ryan	38, Albany Road
Ayesha and Safiyah Jeeva	15 Beechwood Avenue Lower
Joan and Gerard Cullen	15, Park Drive
Rebecca and Padraig Mathews	47, Merton Drive
Yvonne Kelly	15 Beechwood Road
Cooleen McCarthy	4, Albany Road
Catherine Flanigan	7, Beechwood Avenue Upper
Clodagh Canavan and Barry MacMahon	60, Merton Drive.
Ciara and Nils Kickham	39, Beechwood Avenue Upper
Nicola Burns-Kirley	44, Park Drive
Michael and Sharon Foley	10, Mountain View Road
Ann Sheehan and Brain Maye	57, Mountainview Road.
Fionnuala McAuliffe	2, Albany Road
Laura Nolan	52, Beechwood Avenue Lower
Pieter Lemstra and Margaux Kenny	13, Merton Drive
Orla and Ciaran O Conluain	6, Merton Drive
Olivia and Olive Meyrick	21 Park Drive
Peter and Cairiona O'Brien	20 Edenvale Road
Olive and Donal Corbett	22 Merton Drive
Michelle and Graham Farrington-Christie	15, Frankfort Avenue
Deirdre and Eugene Hillery	9, Albany Road
John and Judy Barnes	59 Edenvale road
Maurice Devitt and Teresa Eford	40 Edenvale Road.
Aine Leacy	70, Beechwood Avenue Upper
Joe Shortall	15, Merton Drive
John Barnes	59 Edenvale Road
Sheila Stephens	81, Aisfield Road
Joanne Barrett	31, Edenvale Road
Mary Doherty	49 Beechwood Avenue Upper
Teri Kiberd	31 Edenvale Road
Clare and Gerry Looby	27 Beechwood Avenue upper

Philip and Veronica Daly	Merton Drive
Penny Dewar, Jacob and Josh Kennedy	25 Anna Villa
Aisling Fleming	20 Albany Road
Tom and Margaret Bluett	13, Edenvale Road
John and Maria Gageby	18, Cullenswood Gardens
Michael Smith and Elaine Greene	61 Edenvale Road
Sunniva and Declan Kelly Barrett	44 Palmerston Gardens
Carol Louthe	48 Beechwood Avenue Upper
Paul and Dairine Clinton	Beechwood Avenue Upper
Ann Boyle	54 Beechwood Avenue Lower
Nora and Alan Palmer	22 Mountain View Road
Pat Galvin and Ester McCarthy	65 Edenvale Road
Trish and Aidan Mathews	16, Mountainview Road
Gerry and Geraldine Grenham	18, Edenvale Road
Roger and Ann Costello	27, Edenvale Road
Ann Herlihy and Donal Brosahan	71 Moyne Road
Joan and Gerard Cullen	15 Park Drive
Annemarie McRedmond	Ashfield Road
Kevin and Muriel Thornton	63 Moyne Road
Djamel Benziane and Ann Cooney	9 Edenvale Road
Majella O'Regan	16, Moyne Road
Patrick Collinson and Neil Murphy	59 Beechwood Avenue Upper
Brian Butler and Muriel Moroney	Beechwood Avenue Upper
Puala Guerin and Paul O'Callaghan	?
Maire Nic Fhinn	32, Albany Road
Freida Ryan	29 Upper Beechwood Avenue
JP and Laura Montgomery	4 Beechwood Road
Conor Kelly and Carmen Lopez	47 Park Drive
Ciara and Paul Foxton	9 Merton Drive
Mary Piarse	20 Mountainview Road
Diarmaid and Louise O'Corrbui	17 Cowper Drive

Ross and Keelin Dawson	17, Anna Villa
John Pearson	4 Anna Villa
Fiona and Philip Meagher	74 Beechwood Avenue Lower
Aoife MacCarthy and Stephen Dowling	3 Cowper Drive
Gary and Anne Valentine	36 Park Drive
Andrew and AnnMarie Dunne	1 Tudor Road
Rose and George McAuley	57 Anna Villa
Eimear McCarthy	11 Edenvale Road
Mary and David Diggins	33 Park Drive
Harry and Laura Colley	46 Park Drive
Anthony and Sheelagh Gallagher	29 Beechwood Avenue Upper
Sinead and Kevin Daunt	34 Mountain View Road
Killian and Mary Lannen	35 Park Drive
Dee and Darragh Buckley	39 Anna Villa
Jenny Fee	39 Merton Drive
Margaret and Stephen Masterson	35 Merton Drive
Siobhan Clarke and Padraic Moran	27 Merton Drive
Aoife and Tony O'Riordan	40 Park Drive
Jennifer Cunningham & Tom Eschmann	12 Merton Drive
Simone and Colm Brady	42 Merton Drive
Mairead and Damien Corr	40 Merton Drive
Rory McGinley and Orla Ruane	24 Merton Drive
Teresa Elford and Maurice Devitt	40 Edenvale Road
Marcus and Paula Thomas	32 Merton Drive
Patrick Campion and Jean Gallagher	Beechwood Avenue Upper
Deirdre Dargan	18 Albany Road
Mary Doyle and Michael O'Donovan	14 Albany Road
Des, Siobhan and Hannah Lennon	17 Edenvale Road
Tony and Deirdre Connellan	4 Cowper Gardens
Rachel Murray and Ronan Nulty	25 Merton Drive
Angela Fulton	Tudor Road

Mark McKenna and Maria Olmedo	22 Anna Villa
Nora and Alan Palmer	22 Mountain View Road
Derek and Annica White	41 Mountain View Road
Susan and Steve Iredale	5 Cowper Gardens
Fiona and Martin O'Donohoe	41 Park Drive
Emma Tuohy and Peter McInerney	24 Mountain View Road
Andrew Simpson	84 Ranelagh Road
John and Sheila Lynch	Killeen Road
Francis and Claire O'Keefe	41 Dunville Avenue
Fionnuala and Turlough Donnelly	2 Oakley Park
Diarmuid O'Se and Patricia Taylor	1 Merton Drive
Olivia and Colm O'Neill	26 Merton Drive
Gerry and Anne Dollard	62 Beechwood Avenue Upper
Dan and Dee Herbert	Cullenswood Gardens
Elaine and Niall McGirr	18 Park Drive
Mark Byrne	17 Park Drive
Dermot and Paula O'Doherty	16 Beechwood Avenue Upper
Breifne O'Reilly and Eavan Doyle	51 Edenvale Road
Annmarie and Jonathan Blennerhassett	6 Anna Villa
Phil Coll	34 Park Drive
Denise Cavanagh	41 Edenvale Road
Gerri Skehan and Gerry Griffin	Tudor Road
Frank Long	27 Beechwood Avenue Lower
Anne Marie McDaid	Annesley Gardens
Conor and Janey Cullen	1 Oakley Park
Eleanor Dunican and Andrew Manies	8 Anna Villa
Marcel and Lisa Klein	67 Beechwood Avenue Lower
Cathal and Triona Gibson	25 Park Drive
Colin and Marie Delaney	33 Dunville Avenue
Liam and Helen Bradley	23 Edenvale Road
Louise Halpin	43 Dunville Avenue

Brian and Jennifer Cooney	41 Merton Drive
Carole O'Donnell	23 Albany Road
Miriam Ahern	77 Beechwood Avenue Lower
Joe, Janet and Maeve O'Brien	12 Albany Road
Helen Arnold	14 Tudor Road
Shane and Dee O'Brien	44 Mountain View Road
Damien Maloney	46 Merton Drive
Paul Bushe	19 Anna Villa
Mary Byrne	57 Anna Villa
Ann and Liam Hagan	Tudor Road
Caitriona Fisher and Rebecca Graham	11 Albany Road
Bernard Ryan	Merton Drive
Fred Schelbaum and Fergal Scott	1 Edenvale Road
Richard and Helen Rutledge	Cowper Gardens
Maura and Cyril Doyle	50 Beechwood Avenue Upper
Caitriona and Noel Gaughran	36 Beechwood Avenue Upper
Terry and Tony O'Dwyer	8 Beechwood Avenue
June Linnane	28 Annesley Park
Maeve Valentine	22 Cullenswood Garden
Hazel Piggot and Diarmaid Moran	28 Park Drive
Christine Kennard and Brendan Cleary	10 Edenvale Road
Neill and Frances Murphy	32 Tudor Road
Mary and David Gill	41 Beechwood Avenue Lower
Rhona O'Connor	61 Ranelagh Roady
Geraldine Magnier and Aidan Connolly	53 Edenvale Road
John and Grace Healy	8 Tudor Road
Mark Haverty and Mairead Byrne	Elmpark Avenue
Conor and Jenifer Mahon	34 Merton Drive
Fionnuala Ni Chasaide	Merton Drive
Joanne and Darren Whelan	Anna Villa
Brian Murray and Aideen Loftus	Mountain View Road

Agnieszka and Naeem Bismilla

46 Edenvale Road