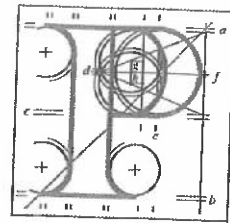


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



An
Bord
Pleanála

Arran Timms & Others
1 The Brambles, Blackberry Lane
Rathmines
Dublin 6
D06 C9Y6

Date: 16 August 2023

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 accept this letter as a receipt for the fee of €50 that you have paid.

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. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. 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

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Arran Timms
1 The Brambles, Blackberry Lane,
Rathmines,
Dublin 6,
D06 C9Y6

Friday, 11 August 2023

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Observation on a Strategic Infrastructure Development Application:
Bord Pleanála Case reference: HA29N.316272
BusConnects Dublin - Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme ("CBC Scheme")

We are residents of the Rathmines Road Lower area, including Blackberry Lane and Grove Park, who will be disproportionately and significantly impacted by the introduction of the CBC Scheme's proposed bi-directional Bus Gate on Rathmines Road Lower, to be located between Richmond Hill and Lissenfield.

We acknowledge this Bus Gate is intended to ensure priority for buses. The rationale and principle for bus priority is accepted. Likewise, the widely accepted positive benefits of the BusConnects concept are accepted, from increased bus frequency to deterrence of private car use. However, it is of fundamental concern that little to no consideration appears to have been given in the EIAR which accompanies the application, as to how the direct impact of the proposals (e.g., the bus gate) and its indirect impact (e.g., vehicular traffic redistribution) will affect established residential areas. The EIAR contains no assessment in this respect. These localised impacts, which include the ability of family housing to continue to be accessible and functional in a manner necessary for everyday life, cannot be ignored.

The EIAR at Chapter 6 notes that:

"There will be an overall reduction in operational capacity for general traffic along the direct study area, given the proposed infrastructural changes to the existing road layout outlined above. This reduction in operational capacity for general traffic will create traffic redistribution from the Proposed Scheme onto the surrounding road network".

Therefore, we consider it to be a significant gap in the EIAR that no attempt has been made to understand the impact of this traffic redistribution, in terms of how existing residential properties which will be affected by the scheme continue to function in the operational scenario.

To be clear, this is not a traffic volume issue in terms of redistribution (which is assessed in the EIAR), but rather a route and travel distance issue. As described below, the Bus Gate will have a hugely disadvantageous impact on travel distances for existing residents, to the extent that some journeys will be made entirely impracticable.

The prohibition of private vehicular access which it mandates for all Rathmines Road Lower area residents, from 6AM to 8PM every day of the week, is extraordinary and will make necessary daily car travel (such as school runs, convenience shopping and other similar journeys) almost impossible within any reasonable time period. The Bus Gate quite literally severs us from our local community, Rathmines, not least our children’s schools, GP surgeries, local shops and our extended families. This prohibition is akin to a kind of near-permanent road closure.

These are not journeys which can on every occasion be made by alternative transport means— certainly not in the middle of a wet January day, in emergencies, or even for the average weekly food shop.

Nonetheless, the various diversions required by route Option RM3, the “PRO for the Rathmines area” will result in vastly extended distance for such essential journeys as tabulated below and demonstrated at the attached route diagrams:

Mapped Journeys:	Kilometres (km)		% Longer
	Now (a)	Proposed (b)	
1. Home to Kildare Place School	1.3	3.7	285%
2. Kildare Place School to Home	1.3	2.6	200%
3. Home to Rathmines Clinic	0.9	3.9	433%
4. Home to Dunnes Stores, Swan Centre	0.6	3.2	533%
5. Home to Grandparents	0.9	3.8	422%

Note:

Journey *time* is a different measure to journey distance. It is difficult to assess the impact on journey time without professional traffic modelling. These journeys were diagrammed in Google Maps, on an off-peak basis. We would argue that time impact would in fact exceed distance impact, on a percentage basis— due to the agreed traffic redistribution noted in the EIAR. That is, Harold’s Cross, Ranelagh and Canal area roads will absorb additional traffic concurrent to our lengthened and diverted journey, making them disproportionately prolonged and more frustrating (especially at peak times.)

These disproportionate impacts are assured except in a scenario where a massive reduction in local vehicular traffic is a generic outcome of the CBC Scheme overall (which is unproven, and quite unlikely.)

Thus, notwithstanding related assertions in the CBC Scheme’s Preferred Route Option Report (Feb-23), route Option RM3 simply cannot “perform well under all criteria”, unless the access criteria in respect of Rathmines Road Lower were categorically ignored.

Moreover, the implementation of this Bus Gate very clearly does *not* “also allow local access for residents” anywhere north of the Bus Gate and south of the new restrictions at La Touch Bridge. In fact, it does the opposite.

It therefore seems evident that none of the Applicant’s assessment undertaken to date considers this local traffic impact.

Not only were these impacts apparently ignored by the Applicant, but we were also never consulted— at any stage. However, after having been independently made aware of the Pre-Application Consultation (Bord Pleanála Case reference HC29N.309584) which was live at the time, we went to great lengths to engage with the Applicant and its agents, mid-2021. We did this through repeated enquiry to local Teachta Dála, eventually securing a meeting with Arup Engineering on Wed 28/07/2021 to discuss our concerns in detail, along with proposed mitigation. Unfortunately, this effort was to no avail. None of our concerns or proposed mitigations were addressed in the application and we never heard from anyone again.

Our list of proposed mitigations is straightforward, and achievable.

Such mitigation could include for example:

1. Relocation of the Bus Gate north, to La Touch Bridge; and/ or
2. Exemption of local residents from the Bus Gate operation, via selective vehicle registration plate identification (or similar); and/ or
3. Revision of the Bus Gate from bi-directional, to northbound direction only.

Our preferred option would be to relocate the Bus Gate north, to La Touch Bridge. It is not obvious to us why such consideration was never made. (An added benefit of this new location would be to remove opportunity for southbound traffic that has not diverted at Grove Park, or earlier, to become literally trapped at the Bus Gate with nowhere to go.)

We are extremely concerned that, in the absence of any such mitigations, our family housing will become close to inaccessible for the majority of the day, every day of the week.

Since the Bus Gate intends to prohibit all vehicles other than “buses, taxis and emergency vehicles”, it would seem our homes would also be substantially less accessible for recycling and waste collection, package or newspaper delivery, maintenance and repair services or third-party access of any kind.

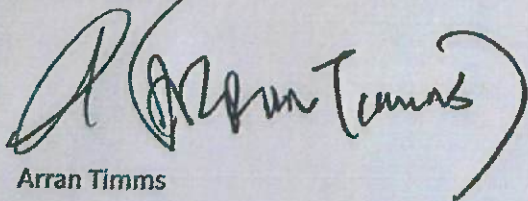
Clearly such impact would be the same for any friends or family who wish to visit.

We do not believe the CBC Scheme’s proposed bi-directional Bus Gate on Rathmines Road Lower is consistent with proper planning and sustainable development for these reasons.

Please be aware that this observation is also made on behalf of the following undersigned residents of the Rathmines Road Lower area, including Blackberry Lane and Grove Park, all of whom share the same concerns, anticipating the same or similar impacts as noted above:

Orla Veale Martin	1 The Brambles, Blackberry Lane, Rathmines, Dublin 6, D06 C9Y6	<i>O. Veale Martin</i>
Maeve Donoghue	2 The Brambles, Blackberry Lane, Rathmines, Dublin 6, D06 E0C5	<i>M. Donoghue</i>
Anne-Marie and Frank O'Reilly	2 Blackberry Lane Rathmines, Dublin 6, D06 P796	<i>Anne Marie & Frank O'Reilly</i>
Tarryn Murphy	85 Grove Park, Rathmines, Dublin 6 D06 DD59	<i>T. Sherry</i>
Conal Sherry	85 Grove Park, Rathmines, Dublin 6 D06 DD59	<i>C. Sherry</i>

Yours sincerely,



Arran Timms

1 The Brambles

+353 (87) 1032498

arran.timms@outlook.com

Items to support our grounds of observation

Route diagrams demonstrating example diversions required by route Option RM3, the “PRO for the Rathmines area” showing vastly extended distance for essential journeys, on a before and after basis.

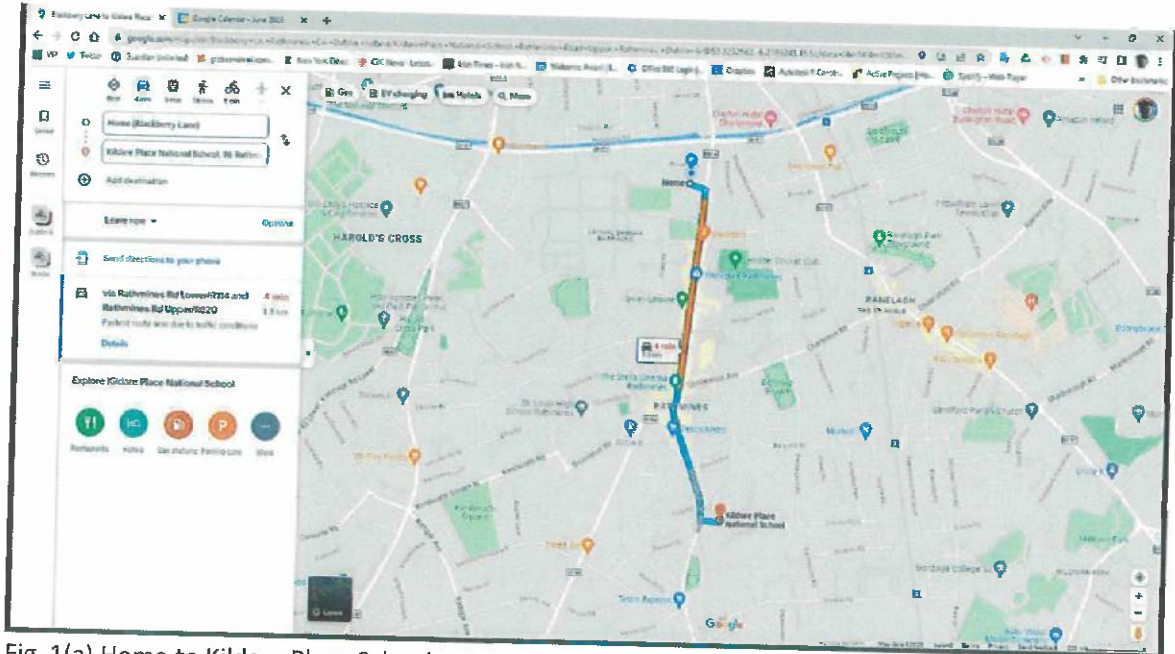


Fig. 1(a) Home to Kildare Place School – Now

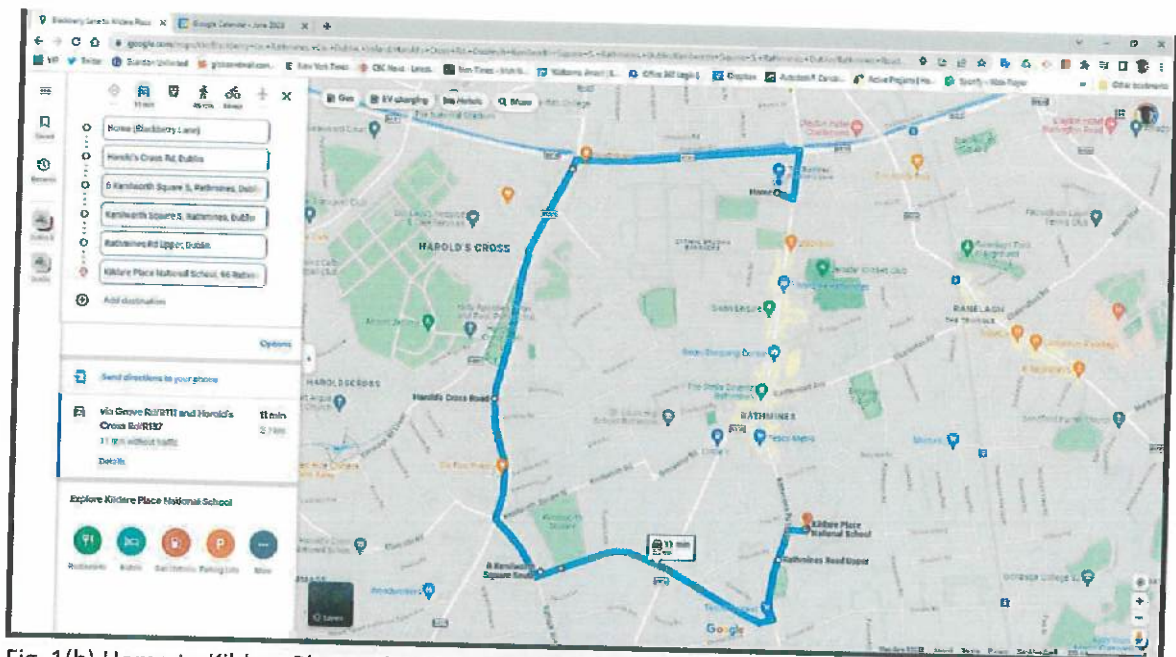


Fig. 1(b) Home to Kildare Place School – Proposed

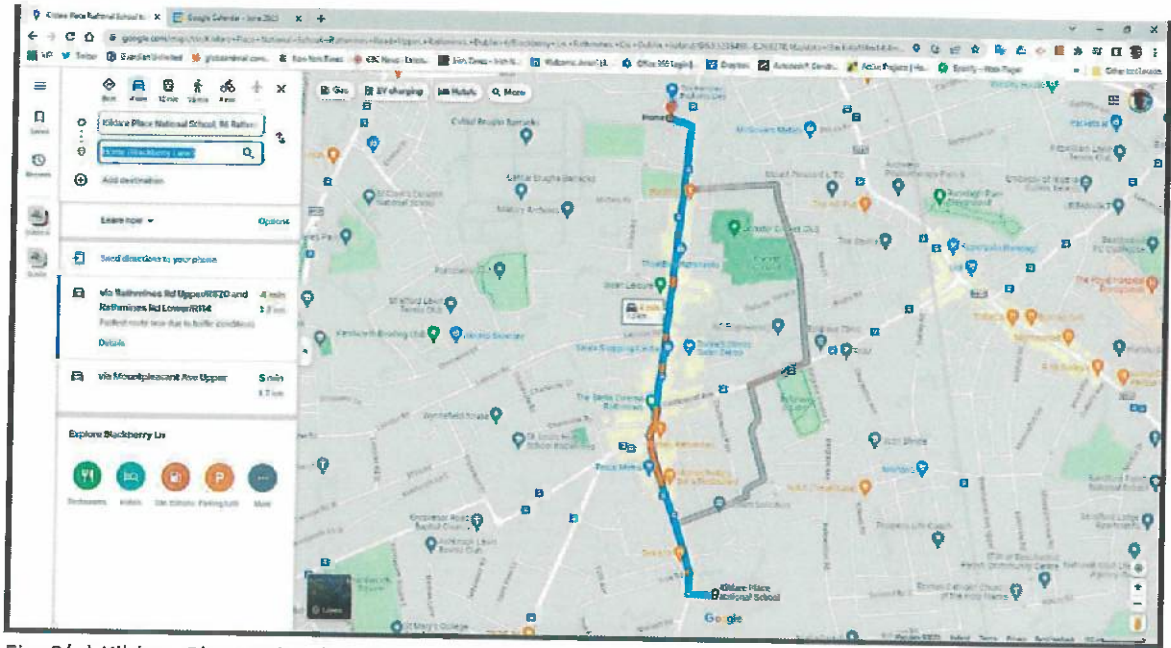


Fig. 2(a) Kildare Place School to Home – Now

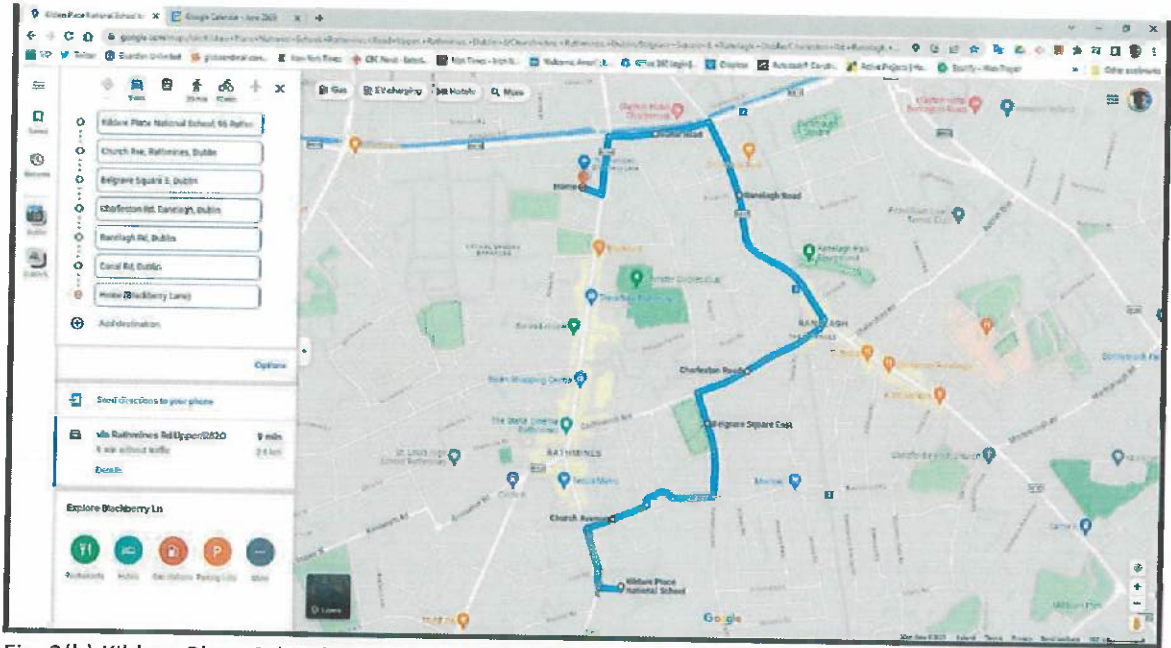


Fig. 2(b) Kildare Place School to Home – Proposed

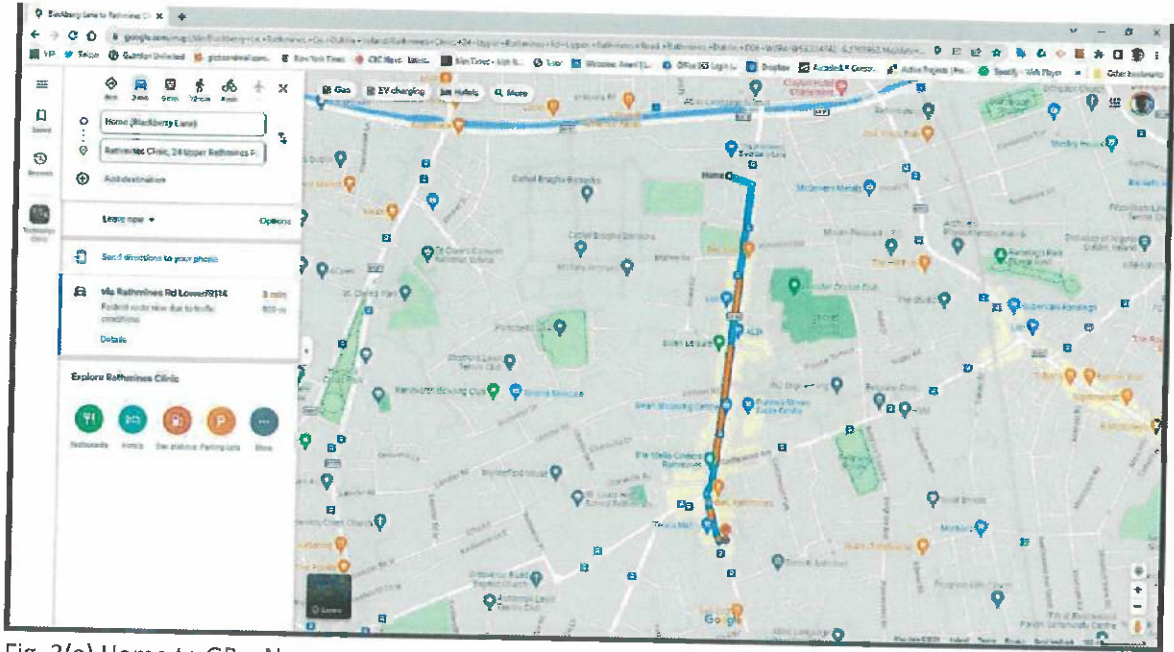


Fig. 3(a) Home to GP – Now

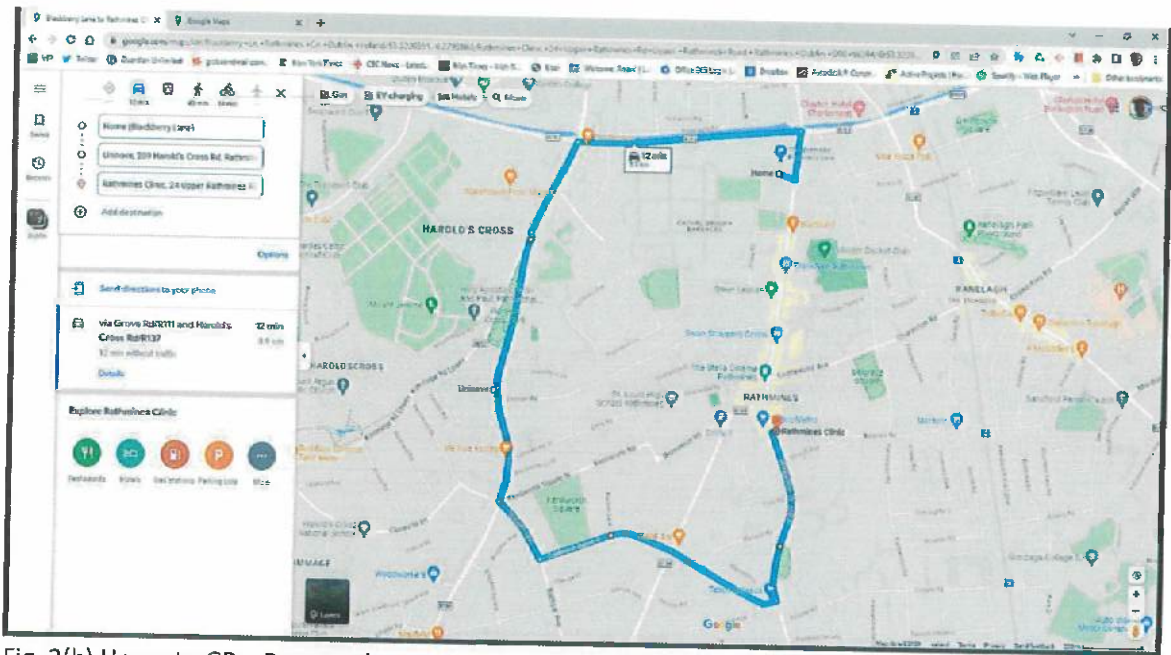


Fig. 3(b) Home to GP – Proposed

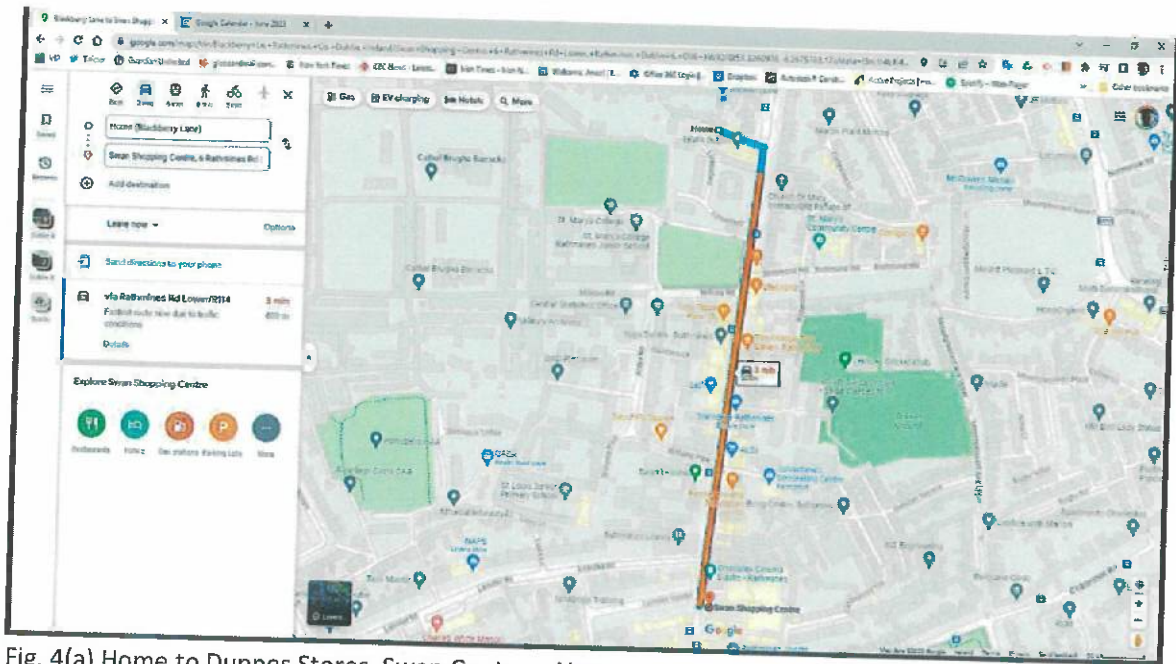


Fig. 4(a) Home to Dunnes Stores, Swan Centre – Now

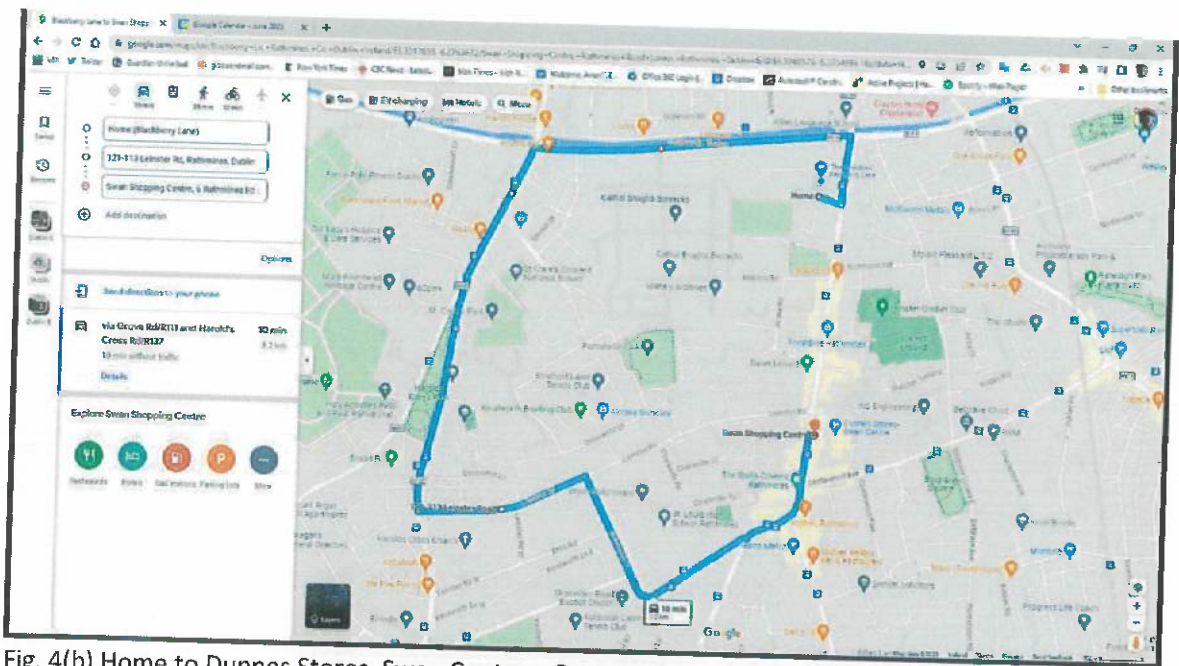


Fig. 4(b) Home to Dunnes Stores, Swan Centre – Proposed

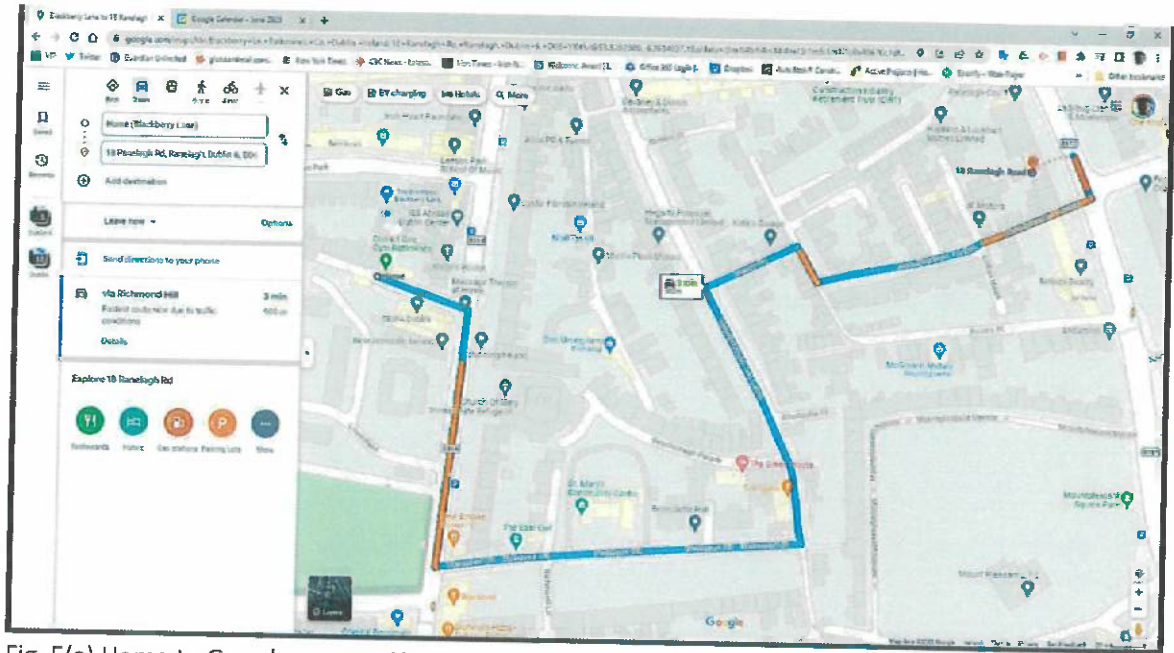


Fig. 5(a) Home to Grandparents – Now

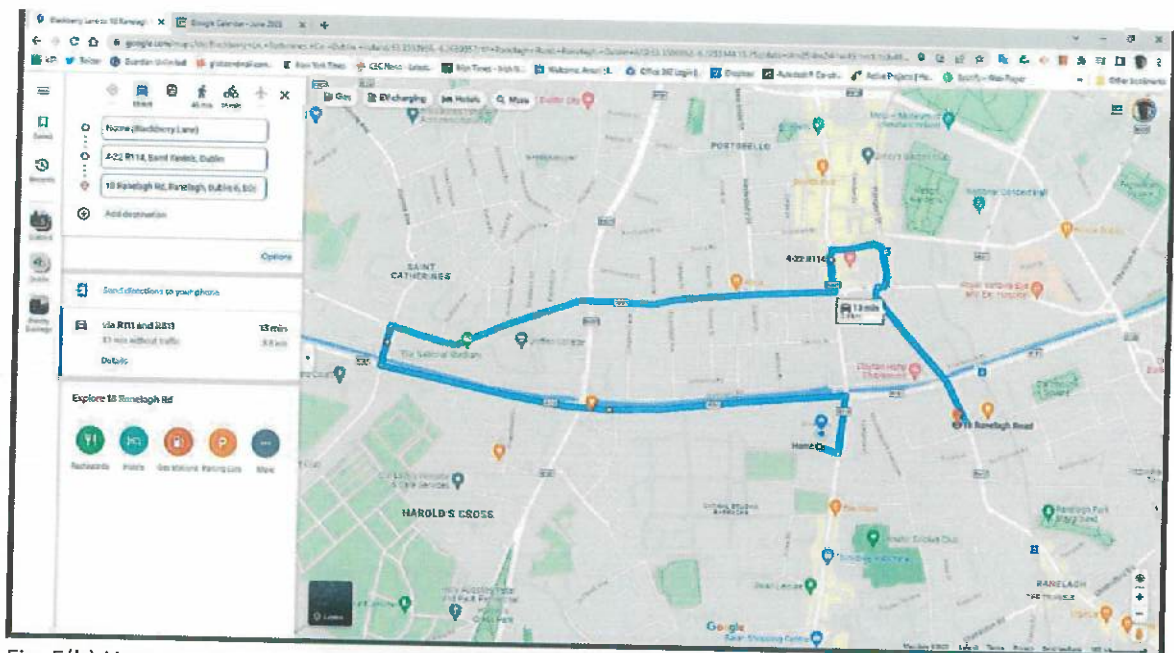


Fig. 5(b) Home to Grandparents – Proposed

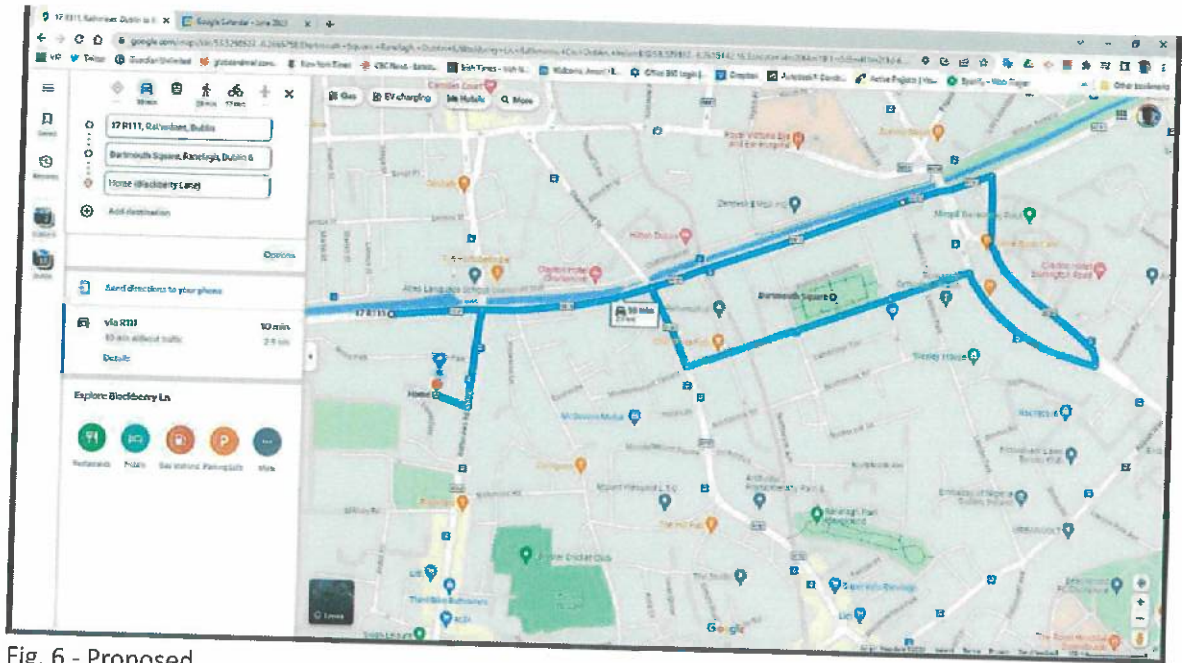


Fig. 6 - Proposed
Showing the convoluted manner in which we will be forced to access our home, when arriving from
a western direction