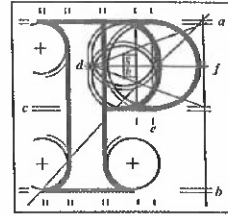


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

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

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

Teil	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

AN BORD PLEANÁLA

LDG- 065786-23

ADP- _____

15 AUG 2023

Fee: € 50 Type: CABA

Time: 12pm By: [Signature]

SUBMISSION TO AN BORD PLEANALA – Belgrave Residents Association:

**BUS CONNECTS BUS CORRIDOR TEMPLEOGUE/RATHFARNHAM TO CITY CENTRE
APPLICATION: 316272**

An Bord Pleanála

64 Marlborough Street, Dublin 1, D01 V902

August 2023

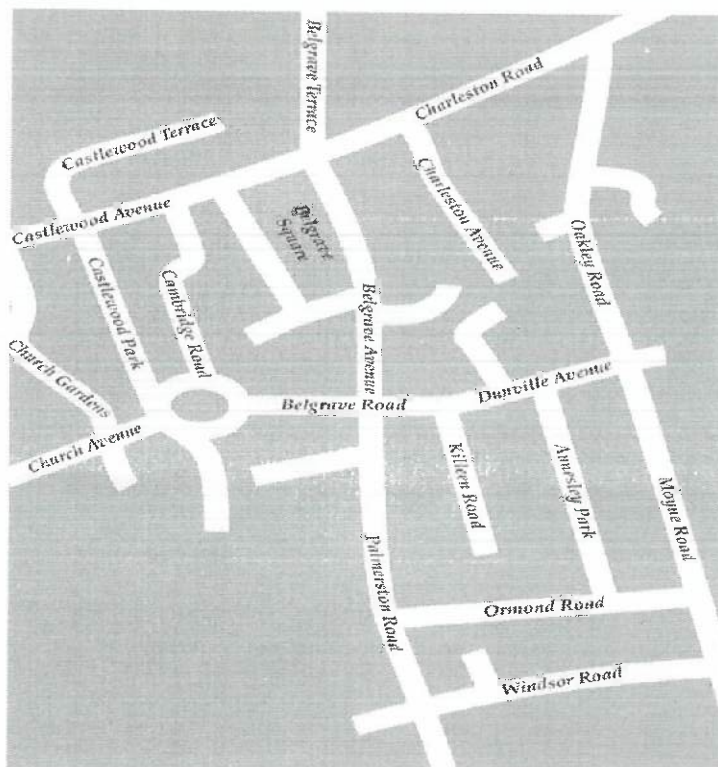
Belgrave Residents Association (BRA) understands that Dublin transport infrastructure needs to be amended for active travel (e.g., by encouraging both walking and cycling), and by the provision of an enhanced public transport structure (bus priority measures being adopted in order to minimise car use,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

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

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

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

Map of area covered by the Belgrave Residents Association



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

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

We therefore oppose this proposed scheme as it stands.

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

Access to Rathmines

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

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

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

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

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

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

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

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

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

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

Bus-gate at peak hours only

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

As an alternative consideration should be given that Dublin City Council's 'Priority Traffic Lights' are a proven solution to manage easy flow of buses with much less negative impact on adjacent residential roads.

Impact of traffic redistribution

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

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

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

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

Upper/Lower Mountpleasant Avenue

The proposal to restrict movements on Mountpleasant Avenue Lower, north of the junction with Richmond Hill to pedestrians and cyclists only through the introduction of planted build-outs this would impede the movement of residents as historically this is a customary route serving the surrounding area which runs (North/South) from Belgrave Square to Cowper Road and (East West) from Moyne Road/Oakley Road to Palmerston Road.

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

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

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

Environmental impact

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

Park and ride

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

On-street parking

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

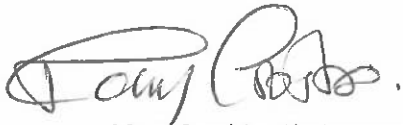
Other issues of concern

The vast amount of felling of trees due to the construction of the 230 KM of bus priority lanes is unacceptable. Slow-growing mature broadleaved trees absorb CO₂, removing and storing the carbon while releasing oxygen back into the atmosphere. They also provide shade and provide wildlife habitat. These are only some examples of the ways in which trees improve our quality of life.

Conclusion

In the light of the points raised here and having regard to the many specific issues which arise in relation to the impact of the wider Rathmines community BRA urge An Bord Pleanála therefore to take full consideration of the general concerns of local residents.

Your sincerely,



Mary Crosbie, Chairperson



Daniele Moloney, Secretary

belgraveresidents@gmail.com, ~~XXXXXXXXXX~~

11th August 2023

Mary Crosbie

27, Ormosel Rd

Rathwines

DOB XKB8