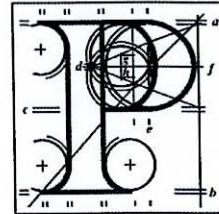


Our Case Number: ABP-316272-23



An
Bord
Pleanála

Margaret and Patrick Kelly
23 Charleville Road
Rathmines
Dublin 6
D06V1K5

Date: 11 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 observation or submission in relation to the case mentioned above 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 be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the applicant and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at www.pleanala.ie and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

BL50A

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64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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23 Charleville Road,
Rathmines,
Dublin 6.
D06 V1K5.

To An Bord Pleanála, Re the Proposed Templeogue Rathfarnham Bus Corridor.

We wish to make the following observations on the National Transport Authority Plan for the Templeogue Rathfarnham Bus Corridor, as submitted for approval to An Bord Pleanála as a Strategic Infrastructure Development.

1. While it would be hard to disagree with the objectives identified of facilitating faster access to the city centre and greater use of public transport, reducing traffic pollution, and improving civic amenities, it is far from obvious that the proposed scheme is capable of achieving these objectives on a scale sufficient to offset its negative impacts.
2. The benefits identified in terms of traffic through cutting journey times are admitted to be so minimal that they fail to justify the enormous sums involved, said to be in excess of two billion euro at present estimates. This is all the more pertinent in that the Templeogue Rathfarnham Bus Corridor is only one of twelve such schemes proposed for the city as a whole. Experience of recent major infrastructural projects in the Dublin area, such as Luas and the National Children's Hospital, suggests the eventual costs will be at least double this.
3. What is presented is a narrow engineering solution to a transport problem with little regard to its broader social impact along the corridor. Implementing it would severely blight the long-established suburban centres of Terenure, Rathgar and Rathmines, through cutting off easy access for the residents to churches, schools, local shops, libraries, sports grounds, &c; diverting heavy traffic through narrow residential streets, and damaging local shops and businesses. There is little concern for the needs of the elderly, the disabled and those with small children. As such it represents a threat to the civic life of these neighbourhoods, and would result in the loss of valuable social capital in these long-established suburbs and lead to the promotion of urban decay.
4. These social implications of the proposal are matters that properly belong to the consideration of Dublin City Council and its elimination from the formal consultative process is not merely regrettable but in the circumstances falls little short of an undemocratic abuse of process.

AN BORD PLEANÁLA	
LDG-	<u>065508-23</u>
ABP-	<u>316272-23</u>
02 AUG 2023	
Fee: €	<u>50</u> C.H.Q.
Time:	<u>POST</u>

5 There is no mention of provision for additional buses to meet the proposed increased use of public transport, and currently the Transport Authority is hard put to find sufficient drivers to service the existing bus service.

6. While considerable tree and shrub planting is envisaged with the objective of enhancing urban amenities, there is no indication who will maintain these plantings. New trees &c. die if not regularly watered in their early years, as has happened on an extensive scale for City Council plantings in the recent dry summers (likely to become increasingly frequent). The City Council lacks resources to maintain its existing stock of street trees, and the NTA gives no indication it will assume responsibility for the new plantings. There is also the question of the proposed destruction of well over one hundred mature trees along the route, which at present serve as important filters to traffic pollution.

7. The assumption that existing railings, gateways and garden walls can simply be moved where roadways are widened after compulsory purchase is not convincing. Many of these boundary features along Terenure Road East and Rathgar Road are granite structures over 150 years old, liable to disintegrate if moved, and it is open to question whether there is a sufficient supply of skilled tradesmen to carry out the extensive works involved.

8. The adverse impact on Rathmines, particularly our immediate neighbourhood around Charleville Road, will be considerable. Egress from Charleville Road (which contains four apartment blocks, some eighty individual residences in the street and mews lanes, and a school with over 600 girls) is at present restricted to two exits. The more widely used is the one through Wynnefield Road onto Rathmines Road, on a corner with restricted vision of incoming traffic. This exit will become considerably more dangerous with the introduction of the new bus-lane, particularly for those bound for Castlewood Avenue and Ranelagh (which with the proposed changes further down Rathmines Road will constitute the bulk of traffic exiting Wynnefield Road).

9. The other exit from Charleville Road onto Leinster Road is already constricted by the effective single transport lane along the north-south section of Charleville Road (which leads to Leinster Road), caused by parking. Furthermore, we note that the proposed scheme involves increasing traffic down Charleville Road from the junction of Rathgar and Grosvenor Road. Visibility at the exit onto Leinster Road is restricted, in both directions, by parked vehicles. This junction also functions as one of the two access points to Charleville Road, particularly used by school users; the other being from the busy junction of Rathgar and Grosvenor Roads.

10. It is unclear whether the exit from Leinster Road onto Rathmines Road will provide for a right hand turn in addition to the existing left-hand one. If it does, provision should also be made for a left-hand turn from Rathmines Road onto Castlewood Avenue thereby giving direct access towards Ranelagh, rather than

requiring traffic inbound to the city from Leinster Road to divert along Richmond Hill, Mountpleasant Avenue on to the corner of Belgrave Square towards Ranelagh.

11. The rationale of the proposed bus gate between Richmond Hill and Grove Road is unclear, and it questionable whether it needs to operate for whole period between 6 a.m and 8 p.m. rather than simply the morning and evening rush hours. Its proposed operating time cuts off the majority of Rathmines residents from access to the front of the Parish Church of St Mary Immaculate, a matter of particular concern for weddings and funerals. The bus gate will also divert traffic destined for the city centre eastwards along Richmond Hill, and then southwards along the narrow Mountpleasant Avenue, and into Ranelagh, a route already carrying the main incoming traffic which has been directed onto Castlewood Avenue, Belgrave Square and Charleston Road . Richmond Hill and Mountpleasant Avenue are narrow streets with residential parking and little scope for converting this into off-street parking. The diverted traffic, which will include heavy lorries, will further disseminate traffic-generated pollution through these small streets, at present restricted to larger and more open streets. It is noteworthy that Britain has decided to re-evaluate the policy of diverting urban and suburban traffic on to smaller roads because of its deleterious impacts on residential neighbourhoods

12. No consideration has been given to the consequences of diverting all incoming traffic down Rathgar Road into Ranelagh Road (whether by the Castlewood Avenue route or the Richmond Hill one). Ranelagh Road, which would provide the only means of access towards the city centre from Rathmines, already carries a heavy volume of incoming traffic from Clonskea, Goatstown, and further out.

13. Before embarking on such a hugely disruptive scheme, which, it must be stressed, was conceived in the circumstances prior to Covid, fundamental reconsideration of the project is required. Changes in working practices have significantly reduced the daily flow of traffic into the city (as evidenced in CSO data). Basing the bus corridor plan on pre-Covid data is analogous to the classic planning error of preparing to fight the last war rather than providing for the next one.

14. There is scope for greatly improving the flow of traffic, reducing pollution, and diverting people to public transport by introducing a congestion charge for the city centre between the canals, increasing parking fees, and reducing if not eliminating fares on public transport. Such measures could be rapidly implemented; would involve minimal disruption; and would avoid the enormous expenditure envisaged in the present proposals.

We enclose a cheque for fifty Euros in favour of An Bord Pleanala to cover the fee for making these observations,

Margaret Kelly

Patrick Kelly

Margaret and Patrick Kelly, 31 July 2023.