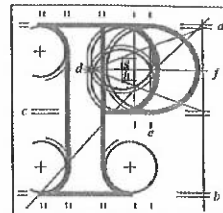


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

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

**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](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

Teil	Tel	(01) 858 8100
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Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## A Submission from The Ranelagh Village Improvement Group (RVIG) on The BusConnects Route 12 proposals

The Ranelagh Village Improvement Group (RVIG) is made up of citizens of the Ranelagh area that are concerned with Ranelagh's longer-term future and specifically with the impacts, both positive and negative, of major infrastructural plans on an area of notable architectural and social heritage and with a vibrant community life.

### Contact

James Wrynn, CoOrdinator RVIG

27 Chelmsford Rd.,

Ranelagh,

Dublin D06Y638

Mobile: [REDACTED]

Email: [REDACTED]

<b>AN BORD PLEANÁLA</b>	
LDG- <u>065619-23</u>	ABP- _____
10 AUG 2023	
Fee: € <u>50</u>	Type: <u>c/c</u>
Time: <u>09:48</u>	By: <u>Hand</u>

# TRANSPORT AND AN 'URBAN VILLAGE' APPROACH TO PLANNING

## 1.0 Introduction

**The Ranelagh Village Improvement Group (RVIG)** is made up of citizens of the Ranelagh area that are concerned with its longer-term future and specifically with the impacts, both positive and negative, of major infrastructural plans on an area of notable architectural and social heritage. BusConnects Route 12, which doesn't pass directly through the area but will have major negative indirect impacts as currently planned, is an issue of real concern for Ranelagh Village and its environs and is the subject of this submission.

RVIG recognises that a great deal of time, effort and resources has gone into the planning and development of the BusConnects initiative in general and of Route 12 (Rathfarnham to City Centre) in particular. We accept that transport planning is a difficult and fraught process – especially in the current period of climate change and other environmental and social challenges. We believe, however, that insufficient attention has been paid in the planning of this and other transport initiatives to the imminent threats to and longer-term impacts on Dublin's inner suburbs and villages – many of them with a strong architectural and social heritage - and particularly to the indirect/off-route effects on our own Victorian and Edwardian village of Ranelagh. The unique role and contribution of these neighbourhood/village areas to urban planning and development, clearly recognised in the recently agreed Dublin City Development Plan 2022-2028, is not reflected in this proposal.

Ranelagh should therefore not be seen as being primarily an access route for the outer suburbs of the Greater Dublin Area but something that has to be cherished and planned for in its own right. Leaving aside other ongoing and proposed threats and challenges, Ranelagh is faced with direct impacts from the Clonskeagh to Charlemont St. Cycleway and from Routes 86,87 & 88 – as well as Orbital Route S2 of the wider BusConnects Plan which it is proposed will pass directly through the Village, alongside the significant commercial and commuter traffic that will be diverted from Route 12 into the area, primarily because of the imposition of a Bus Gate at the bottom of Lower Rathmines Rd.

## 2.0 Consultation Process

These proposals have gone through a series of so called 'consultations'. This consultation process has been completely flawed. We will cite two examples.

Firstly, a consultation meeting was held in The Hilton hotel at an early stage. It was almost completely useless as most of the personnel present on behalf of the plan were completely unable to answer or clarify the issues addressed to them. The vast majority of the people who attended that session left very frustrated.

Secondly, the documentation provided at this stage is enormously complex and extensive, 1,000 pages plus. For example, many members of our resident's group, RVIG, are people who have held senior positions in very substantial organisations. Yet we have found large sections of the document impenetrable. Such a process is not genuine consultation and no serious effort was made to explain the proposals to the local population and interest groups.

The current plan involves a Bus Gate on Lower Rathmines Rd., with only buses and, possibly taxis, passing through it. This is the main reason for greatly increased traffic being diverted

into Charleston Rd. and other parts of Ranelagh (through the Rathmines/Castlewood Ave. junction).

In addressing the flow of bicycles, buses and other types of traffic into and out of the City Centre in this crucial part of Route 12, a number of options have been proposed and have been the subject of a very limited public consultation process - with the NTA only engaging in a limited way with residents' associations and other groups along the Route itself and no account being taken of the major impacts on surrounding areas such as Ranelagh. Two options were originally mooted, with a third option involving the Bus Gate being added fairly late in the process to the two earlier proposals. (Preferred Route Option Report, February 2023 ps.220-235)

Neither of the original proposals envisaged the need for such heavy restriction of traffic flows, with one allowing for the continuation of two-way traffic into and out of the City Centre. Without any obvious local or expert support, the added option, including the Bus Gate, has been selected to be presented in the Planning Application to ABP.

### **3.0 A traffic Flow proposal**

The BusConnects proposal has been developed almost exclusively as a solution to a traffic flow problem where the proposals are evaluated almost from a purely traffic flow perspective. While the proposals nominally engage in an environmental assessment as required by law, it does not in any way locate the proposals in a wider environmental assessment for its effects on routing very significant traffic flows through a network of residential streets of one of the most significant Victorian architectural areas of Dublin and through a neighbourhood of strong local identity and character.

As a consequence of the proposed Bus Gate and the resultant increase in traffic diverted into Ranelagh, the NTA's Planning Application includes a previously undisclosed (and therefore undiscussed!) proposal to ban all right turns into Ranelagh Village for traffic coming from a southerly direction. (Environmental Impact Assessment Report Vol.1 p.22). This involves banning right turns at three different junctions. While this appears to be aimed at preventing the diverted traffic from creating additional problems in the Beechwood area in particular, it will have the effect of diverting all local traffic across the Green LUAS line at Dunville Avenue, increasing traffic volumes and distances travelled, as well as risks for all users – pedestrians (including school-children) cyclists and motorists - at this narrow and already busy crossing. There may be a further unacknowledged effect on the current No.18 bus route (proposed Orbital Route S2), which turns right from the Angle/Triangle into Ranelagh and then left onto Chelmsford Rd.

*Consideration needs to be given to keeping at least one of these crossings open for right - hand turns – especially at non-peak hours.*

### **4.0 Encouraging walking to school.**

In Ranelagh there are 7 schools, 4 primary and 3 post-primary. These schools draw largely on the residential streets around Ranelagh Village. This means there is a huge movement of very young and somewhat older children through these streets. The diversion of very significant traffic through these streets is an irresponsible proposals constructed almost solely through

the prism of traffic flows. It is noteworthy that the NTA has as a policy objective of encouraging school going populations to switch from car delivery to pedestrian and cycling modes. Yet these proposals consist of actions to drive the school going population into cars for considerations of safety.

Ranelagh is a village of strong community identity and a life style revolving around safe access to the facilities of the village- in many ways many of the elements of the '15 Minute' concept of communities advocated by the Dublin City Development Plan. Diverting significant traffic flows through the village will greatly damage the nature of Ranelagh.

## **5.0 Specific issues on traffic flows**

**5.1 Shifts in usage.** The critical objective of the proposal is to reduce the movement of people in private cars by shifting mobility to public transport in particular but also to walking and cycling movement. The proposal argues that the proposal when implemented will reduce private cars by 30(am)/39% (pm). It is difficult to accept this proposition. For people to change transport mode require a better service(that that of a car) The estimated saving of time is given as about 10%. While this amount of time is aggregated over a year, it's hardly the consideration of most who will be evaluating their journey time on the day of travel. Even increased frequency of service will not alter this calculation. Thus, it is not plausible to base a plan on this marginal transition of journey time. It will only be a saving of about 5 minutes for most journeys according to the documentation.. There is also the proposition that traffic volumes inbound on Rathgar Rd will drop for 603 to 109 per hour, a drop of c.80%, an extraordinary implausible proposition.

**5.2 Capacity issues for diverted traffic.** The principal diversion is the inbound diversion of traffic from Rathmines to Castlewood Avenue and thus by Charleston Rd to Ranelagh Rd Lower. Traffic for Palmerston Rd will presumably be forced down Charleston Rd as well although some may make an earlier diversion through Dunville to Ashfield Rd. Several issues derive from this. As noted earlier these extra flows are entirely due to an insistence on the Bus gate proposal. The basis of the projected figures is not clear. More importantly, the effects of these diversions are categorised as 'low' or 'moderate'. But no rational or benchmark guidelines for assigning these designations are provided and appear very subjective.

The diverted traffic to Castlewood Ave. will include all commercial vehicles. At the commencement of Castlewood Ave. there is a major pinch point due to the narrowness of the road. Currently it is posing difficulties as two large vehicle, lorries or buses, require difficult negotiation to pass at this point. This will be greatly exacerbated with the increased volumes, particularly including all commercial vehicles slowing traffic considerably. The data indicated that Castlewood traffic will increase 618 to 821, an increase of approximately 30%.

Palmerston Rd will increase from 108 to 304, a 200% increase. Ashfield will increase from 330 to 458, an increase of almost 40% which will be filtering through residential Rds. , busy with school going students. The net effect of these movements is an increase on Ranelagh Rd (at Northbrook junction) from 970 to 1349, an increase of just under 40%. No mention is made of the capacity implications of this apart from a general remark that they are of 'Low Impact'. (Figures from Table 6.48)

**5.3 Integration with other traffic plans.** A major cycle way initiative is planned from Clonskeagh through Ranelagh to the City Centre. On inquiry (in red below, response follows. in black) to the NTA about this omission, Section 21.1 of Chapter 21 was cited as a reason stating that only plans:

*As you are aware a major cycleway project is scheduled for Ranelagh. Part of its design is scheduled to give greater priority to pedestrians and cyclists over cars. This will presumably, reduce speeds of vehicular traffic. Have the effects of this cycleway been integrated into the analysis of the Ranelagh and Ranelagh Roads capacity for the additional traffic resulting from Route 12 implementation?*

Chapter 6 of the EIAR considers the Traffic and Transport Impacts of the Proposed Scheme, linked below.

Section 21.1 of Chapter 21 sets out the methodology by which the Cumulative Assessment has been carried out:

*"This chapter reports the assessment of cumulative impacts of the Templeogue-Rathfarnham to City Centre Core Bus Corridor Scheme (hereafter referred to the Proposed Scheme) in combination with other existing and or approved projects and projects which, at the time of assessment, were yet to be approved, but for which a decision on such project is reasonably foreseeable over the likely consenting and construction period anticipated for the Proposed Scheme."*

At the time of submission, no planning application had been submitted for the proposed Sandyford Clonskeagh to Charlemont Street Pedestrian and Cyclist Improvement scheme, and as such it has not been considered during the assessment of the Proposed Scheme.

(End of response)

This is an extraordinary approach to a relevant development that has a high priority and is likely to be implemented by 2028, the implementation date of Route 12. It is completely unacceptable.

## **6.0 Conclusion .**

**The Ranelagh Village Improvement Group, (RVIG) argues that this proposal should not be allowed proceed as proposed. Specifically:**

- 1) It has had a completely inadequate consultation process which was substantially nominal. The late addition of eliminating the right turn from Ashfield was never subject to consultation. These failures negate the validity of the overall consultation process. This elimination of the right turn will be a huge inconvenience to residents in Ashfield, Mornington and other adjacent roads resulting in circuitous diversions to achieve access to Ranelagh Rd. and with increased pollution and CO2 production. It is a significant element of the proposal.**
- 2) The proposal takes no account of the corollary effects on residential adjacent areas because of the effect of the diverted traffic flows.**
- 3) The plan is detrimental to other plans by the NTA to encourage more 'Walking/cycling 'to schools' policies of the NTA.**
- 4) The effect of the traffic diversions has not been seriously documented, nor taken into account, has capacity issues for the diversions.**
- 5) The plans fail to take into account the effect on other plans being developed (e.g., Cycleway).**