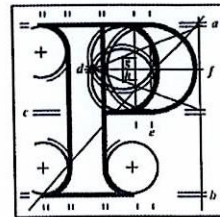


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Senator Michael McDowell
Seanad Éireann
Leinster House
Kildare Street
Dublin 2

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

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Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



SENATOR
MICHAEL MCDOWELL

14th August 2023

**Submission to An Bord Pleanála re: NTA/Bus Connects
Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme**

By way of general comment, I wish to make these overall points regarding the Bus Connects Core Bus Corridor Scheme.

- The current proposals will, if implemented, very severely impact non-bus traffic in the form of lorries, vans, cars and motorcycles.
- If implemented, there will be wide-spread and very severe traffic congestion on major traffic arteries, particularly at peak times and during school term time.
- This severe congestion will be seriously damaging to Dubliners for whom improved bus transport does not meet their daily needs.
- No proper research is evident in the published proposals of the collateral damage to non-bus transportation including commercial vehicles and other forms of public transport including taxis.

In relation to the Route 12 proposals, I wish to make the following observations:

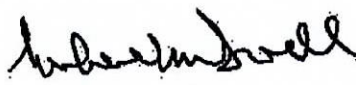
- It makes no sense to have a single lane one-way traffic regime for Rathgar Road, funnelling into the narrow squeeze point at the junction of Lower Rathmines Road and Castlewood Avenue.

- I do not accept that the transportation needs of Dublin city require or justify the Route 12 proposals. The impact of working from home arrangements on public transport demand in the city warrants further detailed examination.
- The proposed traffic gate at Lower Rathmines Road is wholly unjustified and unnecessary. The operation of the bus gate at College Green should be examined in light of certain unintended consequences of removing cars from that route. The proposal to completely remove all buses from College Green has also been significantly delayed with the NTA citing a shortage of drivers as a key factor in delaying the full implementation of the Bus Connects project. This must be taken into account prior to major infrastructural change.
- Likewise, the suggestion that most Rathgar non-bus traffic to the city centre be diverted onto Castlewood Avenue/Belgrave Square/Charleston Road is a recipe for complete congestion and chaos as these roads are predominantly residential and not designed for major traffic volumes. The NTA has categorised the impact of these increased traffic volumes as "low" which is a severe understatement of the likely implications of such increases
- The traffic flow proposals including the banning of right hand turns into Ranelagh village are excessive and will divert local traffic, causing longer journeys and major congestion in the area
- The envisaged reduction of traffic to two single lanes with no filter left lane at the Ranelagh/Chelmsford Road Junction is utterly counter productive and will cause massive delays for the S2 route (formerly the 18 route), an important east-west bus connection
- The environmental impact study is inadequate with no comprehensive analysis of the potential traffic flows from Rathmines bus gate which will operate from 6am – 8pm 7 days a week, diverting all non-bus or bicycle traffic onto Castlewood Avenue/Charleston Road and the Triangle. These include severe congestion issues, delays for private and commercial traffic, noise pollution and a likely deterioration in air quality in the vicinity. A legal challenge to these proposals is likely in light of these and other anomalies in the scheme's design.

- The proposals entail cutting off all non-bus vehicular traffic from Rathmines, Rathgar and Dartry from access to the city centre via Lower Rathmines Road and Mount Pleasant Avenue. In effect, the only means of access to the city for such traffic will be via the already heavily congested Clanbrassil Street and Charlemont Street bridges.
- Diverting all non-bus traffic from Rathgar, Terenure, Rathmines and Dartry to a single canal crossing at Charlemont Street will create enormous traffic congestion, delay, and concentrated emissions on already congested roads.
- The route from Lower Rathmines Road via Castlewood, Belgrave Square North and Charleston Road simply does not have the capacity for all such traffic approaching the city centre. When combined with Inward traffic flow from Sandford Road, Milltown, Goatstown, Dundrum and Sandyford there will be massive congestion at the Triangle in Ranelagh and along Ranelagh and Ranelagh Road.
- No study has been conducted or evidence produced in relation to the consequences of the proposal
- The failure of the NTA to conduct detailed surveys and projections concerning these aspects of their proposal is a fundamental legal error which breaches the requirements of national and EU law in relation to Environmental Impact Assessment (EIA)
- For this reason, the NTA proposal is being made unlawfully and any such proposal would require the submission of a detailed Environmental Impact Study (EIS) in relation to the likely environmental consequences of diverting a large volume of traffic onto the Ranelagh axis and the diversion of traffic onto the Castlewood Avenue/Charleston Road axis, and the resulting congestion at the Triangle.
- Failure to carry out an Environmental Impact Study renders the application unlawful and will naturally be challenged in the courts if the application is pursued or approved.
- The ending of the 18 bus route is completely unjustified as it deprives a very considerable number of working people the means of travel between home and work from Ballyfermot to Sandymount and the suggestion of the S2 route extending to Poolbeg is irrelevant.

- The Ranelagh Village Improvement Group has made a detailed submission and I endorse their observations

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael McDowell', written in a cursive style.

Senator Michael Mc Dowell