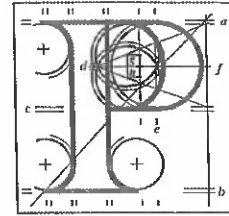


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

The Rathmines Initiative  
c/o Michael Kelly  
49 Lower Mountpleasant Avenue  
Rathmines  
Dublin 6  
D06XD74

**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,



Eirinear Reilly  
Executive Officer  
Direct Line: 01-8737184

Teil	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1890 275 175
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

# RATHMINES INITIATIVE

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

<b>AN BORD PLEANÁLA</b>		c/o 49 Lr. Mountpleasant Avenue	
LDG-	065789-23	Rathmines	
ABP-		Dublin 6	
		D06 XD74	
15 AUG 2023			
Fee: €	50	Type:	CHA
Time:	16:32	By:	HARD
			15 <sup>th</sup> August 2023

Dear Madam / Sir

## RE: TEMPLEOGUE / RATHFARNHAM TO CITY CENTRE CORE BUS CORRIDOR SCHEME

The Rathmines Initiative submits the following observations on the planning application lodged by the National Transport Authority for the above.

The development of the Bus Connect project is a key part of the delivery of the Irish government's policy to prioritise walking, cycling and public transport over the private use of motor cars. The global climate crisis and the need to urgently address it underpins the strategy. Traffic congestion, especially during morning and evening rush hours, needlessly wastes people's time and the earth's resources.

Rathmines residents, who are privileged to live within walking distance of the city, will be inconvenienced by the Bus Connects proposal. The Rathmines Initiative is mindful of balancing inconvenience to residents and businesses with the benefits accruing to those living outside the city centre, should the promised fast and reliable bus service be delivered. The Rathmines Initiative is mindful of the environmental benefits which the Bus Connects proposal should deliver, i.e., reduced traffic pollution, enhanced cyclists' safety and prioritisation of pedestrians.

Lack of public engagement: An essential element of a planning application is that anyone can view the documents, understand the proposals and draw conclusions. Many local residents had difficulty establishing what impacts Bus Connects, if permitted, would have on their communities. The Rathmines Initiative held two public information meetings in an effort to address the deficit in public awareness and knowledge. The NTA's decision not to engage in depth with the different communities along the route undermined the public consultation process and effective public participation.

Delivery of sufficiently integrated bus network through Bus Connects: As the different bus routes are launched and developed on a piecemeal basis, it is difficult to get a sense of the overall integrated strategy for future bus movements within the city. For Bus Connects to be successful and deliver on its' premise to re-allocate travel from private cars to public transport, it is critical that any location within the city can be reached with just one change of bus. In this context additional east west bus routes will be essential to delivering a sufficiently integrated bus network.

Lack of clarity of traffic modelling assumptions: It is unclear what assumptions have been made which underpin the traffic modelling included in the planning application. It appears that a considerable amount of traffic is assumed to migrate from cars to buses. The Rathmines Initiative is concerned that without a high-quality bus network, motor traffic will mainly be re-routed onto different, and in many cases, residential roads. The impact on Castlewood Ave and Charleston Road is of particular concern as these roads may not be able to support all redirected traffic without negatively affecting pedestrians and cyclists.

Enhanced Public realm: The Rathmines Initiative believes that Bus Connects should facilitate much greater urban realm improvements, including increased planting of trees and additional public seating. The Rathmines Initiative considers that the proposed re-design of the junction of Rathgar Road and Rathmines Road is lacking in ambition. The Rathmines Initiative recommends that An Bord Pleanála asks the NTA, by way of the issue a request for additional information, to submit a revised design for this critical urban space. Place making should be prioritised over road engineering considerations.

The Rathmines Initiative considers that a place making opportunity was lost at the very centre of Rathmines. The Rathmines Initiative suggests that the ground surface between the former Town Hall and Swan Leisure could be designed to indicate that requirements of bicycle and vehicular traffic are secondary to urban realm, pedestrian and place making considerations.

Bus Gate: The Rathmines Initiative recommends that the Bus Gate Hours be limited to 7.00 am-10.00 am and 4.00 pm to 7.00 pm, Monday to Saturday. The Rathmines Initiative recommends that electronic monitoring of all traffic movements be introduced to facilitate the issue of fines as a means to foster compliance.

The Rathmines Initiative notes the negative impact that Bus Gate will have on weddings and funerals accessing Our Lady of Refuge Church from a southerly direction and egressing in a southerly direction. The Rathmines Initiative recommends that An Bord Pleanála asks the NTA, by way of the issue a request for additional information, to consider the above.

The Rathmines Initiative notes that vehicular access to houses and business located on the section of Rathmines Road Lower north of Bus Gate will be severely impacted during Bus Gate hours.

The Rathmines Initiative recommends that access to Grove Park, Blackberry Lane and Lissenfield be deemed residential access only, possibly via plate recognition, and that traffic restriction measures such as tightening of the entrances off Rathmines Road Lower be adopted. The Rathmines Initiative recommends that An Bord Pleanála asks the NTA, by way of the issue a request for additional information, to consider the above.

The Rathmines Initiative notes that vehicular traffic travelling southwards over Portobello Bridge will be able to turn into Grove Park and drive through Grove Park to access Canal Road. In effect Grove Park would become a vehicular rat run. The Rathmines Initiative recommends that An Bord Pleanála asks the NTA, by way of the issue a request for additional information, to consider the above.

The Rathmines Initiative recommends the introduction of a small roundabout at the junction of Mountpleasant Avenue Lower and the canal to allow cars travelling in an easterly direction to turn back to access Rathmines Road Lower.

Cycle Infrastructure: The Rathmines Initiative welcome the enhanced cycle infrastructure described in the Bus Connects proposal. The Rathmines Initiative submits that a double cycle lane, located on the western side of Rathmines Road Lower, would be preferable.

The majority of bus stops along Rathmines Road are designed as 'Island Type' bus stops to reduce the risk of conflict between buses and cyclists. However, one of the bus stops appears to be part of a cycle lane, which is of concern.

It is critical, that the cycle lanes are designed to a standard that would allow less confident cyclists, including families with children, to use the bike lane. With St Mary's and St Louis primary and secondary schools and Harcourt Street, KPS and RMDS primary schools located on Rathmines Road

Lower or in close proximity, this is a missed opportunity to provide safe cycle access to the schools, and thereby removing the need for school drop offs by parents in their cars.

The Rathmines Initiative recommends that loading bays that interfere with cycling paths be relocated and that consideration be given to relocating as many loading bays as possible to side streets.

Realignment of traffic: The Rathmines Initiative welcomes the proposal to permit a right turn from Leinster Road onto Rathmines Road Lower. The Rathmines Initiative recommends that the left turn from Rathmines Road Lower into Castlewood Avenue be reinstated. The Rathmines Initiative notes that disallowing this left turn took place without any consultation with the residents and businesses of Rathmines.

Enforcement of speed limits for buses and e-bikes: The Rathmines Initiative believes that it is important that the 30km/h speed restriction on Rathmines Road Lower and Upper be supported by appropriate design measures to facilitate slower traffic speeds. These measures could include shared surface areas and raised pedestrian crossings at the junctions between Rathmines Road Lower and Upper and all transverse roads.

Mountpleasant Avenue Upper: It is proposed to re-introduce two-way traffic on Mountpleasant Avenue Upper through the installation of a shuttle signal system. The plans do not include any measurements of the widths of footpaths and carriageways at the proposed locations of the traffic lights. The Rathmines Initiative suggests that An Bord Pleanála review the proposed locations for the installation of the traffic lights to satisfy itself that footpath widths would be in compliance with minimum design standards and that the carriageway widths would allow cars to pass each other safely.

Subject to the reservations, caveats and recommendations noted above, the Rathmines Initiative supports the Bus Connects proposal.

A cheque in the sum of €50 in respect of the fee is attached.

Yours faithfully



Michael Kelly  
On behalf of the Rathmines Initiative

The Rathmines Initiative is a group of individuals of differing backgrounds seeking to enhance the quality of life of the diverse community in Rathmines by working in co-operation with statutory, voluntary and commercial bodies and public representatives. The Rathmines Initiative was formed in 1998. The area of interest is Rathmines Road Lower and Upper, i.e. between Portobello Bridge and Dartry.