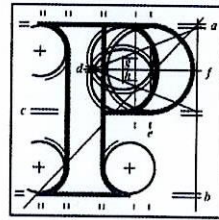


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

The Richview Residents Association
21 Temple Gardens
Rathmines
Dublin 6

Date: 13 July 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.

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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

RICHVIEW RESIDENTS ASSOCIATION

Cowper Road, Merton Road, Temple Gardens, Richmond Avenue South, Richview Park,
Palmerston Park, Palmerston Lane, Temple Road, Temple Villas.

AN BORD PLEANÁLA
LDG- 064983-23
ABP-
12 JUL 2023
Fee: € 50 Type: CHQ
Time: 12:39 By: HAND

21 Temple Gardens
Rathmines
Dublin 6

25 June 2023

Re: BusConnects Templeogue/Rathfarnham to City Centre Route
REF NO ABP No 316272-23

Introduction

This submission is made on behalf of the Richview Residents Association (the Association or the RRA) in response to the submission to An Bord Pleanála for the Templeogue/Rathfarnham to City Centre Route.

The RRA represents the interests of local residents within the Dartry and Rathmines areas of Dublin's southside. More specifically, its membership includes residents of Cowper Road, Merton Road, Temple Gardens, Richmond Avenue South, Richview Park, Palmerston Park, Palmerston Lane, part of Palmerston Road, Temple Road and Temple Villas.

The residents we represent will not be directly affected by the proposed Corridor. However, as residents of Dartry and Rathmines, our members will nonetheless be **significantly** affected by the indirect impact of the Corridor in those areas and in Ranelagh.

The NTA is in charge of Busconnects which forms part of project 2040. This is driven by one entity whereas it should have an interdisciplinary approach. The term 'corridor' itself emphasises the fact that the communities through which it runs will be majorly affected with damaging consequences to the community, built and natural environment.

In this submission, we will make some general comments regarding the proposed Corridor and will then draw attention to some specific impacts that will affect our residents (as well as residents of neighbouring areas).

General comments

We note that the aims of the BusConnects Core Bus Corridors are as follows:

"The Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme (the Proposed Scheme) will support integrated sustainable transport usage through infrastructure improvements

for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future services who will use the corridor.”

While we are very much in favour of safe, efficient, integrated and sustainable public transport, this statement appears to us to be regrettably narrow. In our view, it should include a reference to the potentially significant impacts of the proposals on residents in areas along the corridors and in areas surrounding them. The absence of such a stated aim and of a proper analysis of such impacts is a serious weakness in the proposals and is at the root of the reservations we have regarding the proposed Corridor.

We also think it is highly regrettable that these proposals have been formulated without reference to other highly relevant infrastructure, in particular the development of a metro network whose impact should clearly be considered when devising new bus infrastructure proposals. When the possibility of a metro route to include Harold’s Cross, Rathfarnham, Knocklyon etc was raised by a member of the public at a “Community Forum” meeting in October 2019, the Deputy Chief Executive of the NTA dismissed the suggestion, saying that even if there were a Metro, we would still need improved bus services. But that is not the point – the point is that all forms of public transport for the Dublin area should be designed in a coordinated way that takes account of their interaction on each other and of their respective impacts on the relevant areas. The proposals for the Corridor make no references to other relevant modes of public transport, either present or future.

Specific comments

1 ARCHITECTURAL HERITAGE

Section 8.5.2 of the *Architectural Heritage Protection Guidelines for Planning Authorities* states:

“Exterior fixtures and features of architectural metalwork on walls such as railings, cresting, balustrades and anchor plates are usually an essential part of the character of a protected structure”

At page 194, the Guidelines go on to state:

“Boundary features such as gates were often designed and located to enhance the approach to a building, as seen with this example of an arched lamp bracket sited to light the gateway and path to the front door. Relocating or removing such features would not only make them liable to damage during the works but may also adversely alter the relationship between the structure and the features of its curtilage.”

We have significant reservations about the potential impact of the removal of historic boundaries, railings, gates, pavement and street furniture on sensitive historic streets such as Terenure Road East. The proposal to relocate all the above items would be in direct conflict with the Architectural Heritage Protection Guidelines for Planning Authorities.

2 Arboricultural Impact Assessment Appendix A17.1

This states:

"Trees that are of visual importance to the surrounding area justify special efforts to protect/preserve them, as their loss would have an irremediable adverse impact on the local environment."

Section 4.2 states

"1104 trees were surveyed mainly planted as street trees.

<i>A Trees of high quality</i>	<i>149</i>	<i>13%</i>	6 to be removed
<i>B Trees of good quality</i>	<i>656</i>	<i>59%</i>	89 to be removed

169 in total to be removed"

"National Planning Framework

The National Planning Framework (NPF) seeks to ensure that new development is sustainable and underlines the importance of Green Infrastructure, of which trees form an integral part. This encompasses recognition of the importance of trees in relation to the management of air, soil and water quality along with other associated ecosystem services and climate change adaption. The NPF also seeks to achieve the protection and enhancement of landscapes and a net gain in biodiversity.

Dublin City County Development Plan

"Section 10.5.7 of the Dublin City Development Pan recognises the benefits of trees in humanising spaces, enhancing the environment and minimising the impacts of climate change. "

"Appendix 1: Existing Tree Preservation Orders in Dublin City 2016-2020 of the Dublin City Development Plan has been reviewed and it has been concluded that there are no TPO's identified within the study area."

While there are no TPOs within the area, this is because Dublin City Council has failed to initiate Tree Protection Orders since the above document was made. The only trees with TPOs are those in Dartmouth Square due to the battle between the previous owner of Dartmouth Square and DCC. **So the above statement should not be relied upon.**

Appendix 1

We attach a submission from Trinity College Dublin on the importance of mature trees dated 28th April 2019 whose concerns we share.

3 BUS GATE, RATHMINES ROAD LOWER

We note the following statement in the Brochure relating to the Rathfarnham > City Centre Corridor, (pp.15/16):

"Between Castlewood Avenue and Grove Road, a general traffic lane and a cycle track in each direction is proposed, with the provision of a bus gate between Richmond Hill and

Lissenfield which will restrict general traffic movements. In addition, to remove the potential for motorists to bypass the bus gate via Mountpleasant Upper and Lower, it is proposed to close Mountpleasant Lower to traffic at the junction with Richmond Hill, while maintaining access for pedestrians and cyclists. This proposal was introduced to improve access for local residents to/from the Richmond Hill/ Mountpleasant areas while also restricting BusConnects Core Bus Corridors / 12. Rathfarnham > City Centre vehicular through movements. This bus gate proposal generally allows for some increase to footpath widths through Rathmines and the provision of 2m wide cycle tracks in each direction through the village."

This statement contains no explanation as to why a bus gate is necessary at this junction. (The statement that the proposed bus gate "generally allows for some increase to footpath widths through Rathmines and the provision of 2m wide cycle tracks in each direction through the village" can hardly be regarded as an explanation or justification for its creation.) We have failed to find any analysis in the published documentation as to why a proposal with such disruptive effects on traffic flows in the immediate and surrounding areas is a proportionate measure when account is taken not just of the needs of public transport and cyclists, but also of others who need vehicular access to the city (such as commercial traffic, providers of essential services, parents with small children, the disabled and the elderly). It is, of course, obvious that the creation of a bus gate at the Canal end of Lower Rathmines Road will prevent private vehicles from accessing the City by this route. But this should be stated clearly as its purpose with a reasoned justification as to why such a draconian measure, with all the likely effects on the surrounding areas, is necessary to achieve the overall aims and objectives of the proposed Corridor.

It is also disturbing that the proposal provides no detailed analysis of the likely knock-on effects on traffic flows in the surrounding residential areas, something we would expect to find in any comprehensive, integrated traffic management plan.

Traffic diversions in Rathmines, Rathgar and Ranelagh

For the avoidance of doubt, we set out here our understanding of some indirect impacts of the proposed Corridor on the immediately surrounding area – an area that is accessed by our residents on a daily basis.

We note that the Corridor proposes that Rathgar Road will become one-way for **Northbound** private vehicle traffic. When such traffic reaches **Rathmines from Rathgar** and beyond, its only way of accessing the City will be to turn right onto Castlewood Avenue and to continue onto Chelmsford Road into Ranelagh.

Southbound private vehicle traffic from **Rathmines to Rathgar** will not be able to use Rathmines Road Lower as a direct route from the City nor will it be able to use Rathgar Road, which will be closed to Southbound traffic. It therefore seems likely that such traffic will access Rathgar either through (a) Ranelagh, Palmerston Road and Highfield Road or (b) through Ranelagh, Rathmines Road Upper and Highfield Road (if permitted by the new right-hand turn).

Traffic on Rathmines Road Lower will remain two-way. But the **Bus Gate** at Military Road/Richmond Hill will allow only buses, taxis, cyclists and pedestrians beyond that point in either direction. The only exit for **Northbound** private vehicles from Rathmines Road Lower at the Bus Gate will be to turn left onto Military Road - a right-hand turn onto Richmond Hill will not be permitted. It seems that **Southbound** private vehicle traffic will only be able to access

Rathmines Road Lower via Richmond Hill or Military Road. (The proposed closure of Mount Pleasant Avenue Lower will prevent this route being used as a means of accessing Rathmines Road Lower.) It therefore seems unlikely that Rathmines Road Lower will generate much private vehicle traffic in either direction – which, of course, is the purpose of the Bus Gate. But the effective closure of Rathmines Road Lower to through traffic raises the question as to where private vehicle traffic that currently uses that route will go? It seems clear that much of it would be likely to travel via Ranelagh, which is already at full vehicular capacity at peak times and often at other times of the day.

We have noted the following comments relating to Rathmines in BusConnects publication “Urban Realm Concept Designs”¹:

- *“The irregular layout of the junction of Rathmines Road and Rathgar Road, together with the proposed rationalisation of vehicular movements, provides a substantial opportunity to reduce the current traffic dominance and establish a strong urban focal point. The proposal reduces the amount of road space, provides shorter and safer pedestrian crossings, and creates an attractive pedestrian space along the frontages of the shops on the eastern side of the junction.” [p.18]*
- *“The proposal is to introduce a Bus Gate that will reduce through-traffic in Rathmines Village north of the Castlewood Ave junction. The reallocation of road space proposed, including reduction to two vehicle lanes, provides an opportunity to enhance the public realm along both sides of the street and to reduce the sense of vehicular dominance.” [.19]*

These proposals relating to the enhancement of the “public realm” sound attractive in themselves. They would, however, like the other measures noted already have the purpose and effect of reducing private vehicle volumes through Rathmines Road Lower. *But unless the overall volume of private vehicle traffic decreases significantly as a result of the various initiatives along the Corridor, all of these measures will clearly result in the diversion to Ranelagh and adjacent areas of a large volume of private vehicle traffic that currently uses Rathmines Road Lower.*

So the question – and the major concern - for our area remains:

What analysis has the NTA undertaken to show that the consequences of the proposed Corridor – in particular, the proposed Bus Gate – will not overwhelm our area and - in particular, Ranelagh - with private vehicle traffic that currently uses Rathmines Road to travel to and from the City?

We would be surprised and disappointed if the NTA had not conducted such an analysis. Assuming it has done so, the results should be published immediately.

4 OTHER ISSUES

- retain a level of on-street parking, including disability parking, on the Rathmines Road during off-peak times. This would have benefits, in particular allowing deliveries to small businesses, providing opportunities to shop local etc.

¹ <https://busconnects.ie/media/2089/busconnects-urban-realm-concept-designs.pdf>

- If the bus gate is to be retained, it should only operate during peak hours, The Lower Rathmines Road is a natural access route for the whole area and should be fully utilisable when the demand for use by buses is lower.
- Access to Rathmines Church (Church of Mary Immaculate, Refuge of Sinners), must be retained regardless of the bus gate, especially for funerals and weddings. Access should also be permitted via the bus gate for services such as deliveries to households and bin lorries.
- The vast amount of felling of trees due to the construction of the 230 KM of bus priority lanes is unacceptable.

QUERIES

- 1 While right hand turns will not be permitted from Merton Drive in Ranelagh onto Sandford Road, will it be possible to access Marlborough Road as at present ?
Refer to DRW BCIDC_GEO_GA-1012_XX_00-DR-CR-0042. This junction is effectively a skewed cross roads with 5 arms serving Gonzaga College and Sandford Park National School. This junction must remain as it exists. Similar queries apply to many of the proposed restrictions on Right Hand Turns.

Turning restrictions are proposed at a number of locations off the immediate CBC route to prevent through traffic diverting inappropriately. These locations are summarised below:

- Proposed right turn ban from Grand Parade onto Dartmouth Place;
- Proposed right turn ban from Cullenswood Road onto Ranelagh Road;
- Proposed right turn ban from Ashfield Road onto Ranelagh Road;
- Does the proposed ban on the right turn at Ranelagh from Cullenswood Road to Ranelagh and Chelmsford Road remove the existing bus route?

Proposed left turn bans from Chelmsford Lane and Sallymount.
It is unclear from the documents how local traffic will be impacted.

- 2 Has the change in working from home been factored into the calculations'?

Finally, we think it is regrettable that this consultation was conducted over a relatively short period and during a time that coincided with a Covid-19 lockdown. This is contrary to the Aarhus Convention. This increased the difficulty for individuals and voluntary organisations such as ours to formulate our views in consultation with neighbouring Resident Associations on the proposals by the specified deadline.

Enclosed Fee of 50 Euro.

Submitted on behalf of the Richview Residents Association

by



Marion Cashman, Chairperson