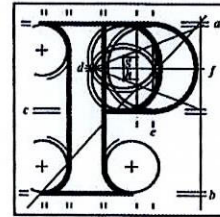


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

John Walsh
7 Mountpleasant Avenue Upper
Dublin 6
D06 H308

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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John Walsh
7 Mountpleasant Avenue Upper
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An Bord Pleanála
Strategic Infrastructure Division
64 Marlborough Street
Dublin 1
D01 V902

Dublin, 11 August 2023

Planning Reference:

Observations in relation to TEMPLEOGUE / RATHFARNHAM TO CITY CENTRE CORE BUS CORRIDOR SCHEME – Focus Rathmines Road Lower and adjoining area

I am supportive of the overall objective of the Bus Connects project and accept that to achieve capacity and reliability of public transportation compromises and adjustments such as the removal of through-traffic have to be made.

However, I believe that the proposed plans fail to maximise the opportunity to deliver a future-proof mobility model for Rathmines which would deliver an efficient bus transport system together with enhanced infrastructure for pedestrians and cyclists. It fails to take into account future increased pedestrian and cycle traffic. It falls short in some locations of the current minimum requirements of the Design Manual for Urban Roads and Streets (DMURS) and did not consider and integrate sufficiently with the Greater Dublin Area Cycle Network Plan (GDACNP). I also think there would have been greater opportunity to improve the public realm in Rathmines. Overall the design proposals are very traffic-engineering led, with designs for bike lanes and pedestrians included as an afterthought.

I am asking An Bord Pleanála to approve the BusConnects proposal but to consider a number of concerns as outlined below and to address those in the form of Conditions in its decision as outlined further below. All of my observations relate to the section of Rathmines Road Lower and impacted roads in this area:

Pedestrian Infrastructure and Public Realm:

- I think it is important that the 30km/h speed restriction on Rathmines Road is supported by appropriate design measures that support slower traffic speeds, e.g. shared surface areas / raised pedestrian crossings at the junctions with Rathmines Road Upper, Castlewood, Leinster Road / outside the library and Military Road / Richmond Hill. **I request that An Bord Pleanála make design measures that support the reduction of traffic speeds, such as those mentioned above, a condition of the planning approval.**

- I am also concerned about the dimensions of some of the footpaths given the large and increasing number of pedestrians in Rathmines and potential points of conflict with cyclists, in particular near bus stops. Design measures should be implemented to slow cycle traffic in those areas and ensure that cyclists yield to pedestrians. A different design with bi-directional bike lanes on one side of the road would have significantly reduced the number of those conflict points. **I request that An Bord Pleanála make a review of the relationship between Cycling, Bus and Pedestrian Infrastructure a condition of the planning approval.**
- I am particularly concerned that the proposed traffic light shuttle system on Mountpleasant Avenue Upper does not comply with the minimum requirement for pedestrian infrastructure and the provision of an accessible and inclusive road design. The shuttle system traffic lights are proposed for installation on footpaths measuring less than 1.0m wide. Vehicles may require to mount footpaths to pass out those cars backed up waiting at the proposed traffic lights, as the carriageway width does not support cars passing each other at this location. Mounting of footpaths was a regular occurrence prior to the implementation of the no-entry for vehicles into Mountpleasant Avenue Upper in 2019. Regrettably, the proposed plans do not include any measurements of the carriage way or footpaths, making an adequate assessment by An Bord Pleanála difficult. **I request that An Bord Pleanála make compliance with the minimum standards for road design (DMURS) and widening of footpaths as required on Mountpleasant Avenue Upper a condition of the planning approval.**

Cycle Infrastructure:

I propose that enhancements to the cycle infrastructure should be considered.

- A double bike lane would be preferable over the 2x single lane routes. This would allow for freer and more efficient flow of cycling traffic. It would further segregate and protect cyclists from traffic and also reduce potential conflict points between pedestrian and cyclists.
- 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 and 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 or in close proximity, this is a missed opportunity to provide safe cycle access to the schools, removing the reliance on private car usage for school drop offs in the area. The cycling infrastructure needs to be designed to such a standard as to allow older children to cycle to school safely.
- In some instances, the width of the bike lanes is below the minimum requirement. It appears that the cycle infrastructure has not been future proofed to account for increased cycle traffic as well as the increasing uptake of non-standard bicycles (such as cargo bikes and trikes used as mobility aids for disabled cyclists).
- It appears that no consideration has been given to how the secondary cycle routes as identified in the Great Dublin Area Cycle Network Plan (GDACNP) Castlewood Road, Charleston Road and Mountpleasant Avenue as well as the feeder routes Richmond Hill and others will be integrated with the primary cycle route Rathmines Road. In fact, the current proposal may negatively impact on cycle safety on Castlewood Road / Charleston Road and the feeder route from Ranelagh via Richmond Hill (crossing Mountpleasant Avenue Upper).

- The proposed closure of Mountpleasant Avenue Lower might provide an opportunity to develop a high-quality secondary cycle routes that runs parallel to Rathmines Road, away from bus traffic and could be a suitable alternative, in particular for less confident cyclists and families with children. I would like An Bord Pleanála to give consideration to extend filtered permeability treatment to Richmond Hill (entered from Rathmines Road Lower) and Mountpleasant Avenue Upper (entered from Belgrave Square) which would provide a safe and enhanced environment for cyclists and pedestrians.

I request that An Bord Pleanála make a review of the Cycling Infrastructure with respect to the above points a condition of the planning approval.

Design for disabled access

While a disability audit has been undertaken for Rathmines Road, I am concerned that sufficient consideration has not been given to disabled pedestrians and cyclists. Designing for people with disabilities will be of particular relevance here as the future Gulistan Development just off Rathmines Road and Mountpleasant Avenue Upper will include a substantial element of senior housing. Cycle lanes proposed for Rathmines Road are relatively narrow and may not be able to accommodate non-standard bicycles such as those used as mobility aids (trikes etc). Furthermore no disability audit has been undertaken for Mountpleasant Avenue Upper, where it is proposed to re-introduce bi-directional traffic and install traffic lights on already very narrow footpaths.

I request that An Bord Pleanála make a Disability Audit and review of the pedestrian impact of this proposal for Mountpleasant Avenue Upper a condition of the planning approval.

The operation of the BusGate

I believe that the removal of through-traffic is critically important to achieve a more reliable bus service. I also welcome the filtered permeability proposal on Mountpleasant Avenue Lower to ensure that Mountpleasant Avenue does not become the default through-road for traffic diverted from Rathmines Road once through-traffic on Rathmines Road is no longer permitted.

I believe that it would be a mistake to reduce the operating hours of the Bus Gate from the current proposal of 6am to 8pm 7 days a week as I think this will undermine compliance with the Gate. Timed operating hours of any type of traffic restrictions tend to see much lower compliance levels. I also believe a bold move is required to support a switch to sustainable travel modes.

However, the local access for some areas is of concern, for example access to Grove Park, Lissenfield apartments, Blackberry Lane, Rathmines Road north of the gate, Rathmines Church of Mary Immaculate Refuge of Sinners as well as St Mary's Day Centre and Meals on Wheels on Richmond Hill.

I think it is important to present a solution that might work for all involved as the Bus Gate is critical for the success for this bus corridor.

I would strongly suggest the introduction of a system that allows local access by making the area between Military Road and the Canal 'local access' only and introduce an automated system based on the technology that is used by toll roads.

By extending this local access area as far south as Military Road would mean Richmond Hill (where the Meals on Wheels operation for the area is located) could also be accessed from both directions on Rathmines Road. There would not be a Bus Gate in a single location as it currently proposed. Instead at the entrance to the 'local access area' signage would alert divers that this is a local access area only and that they can't pass the second virtual gate further along the road.

The local access area should extend from Military Road to Grove Road, which will require blocking off Mountpleasant Avenue Lower, Upper and Grove Park to avoid rat runs, but access to this area is still provided from both north and south direction. Anyone requiring access to the area between Military Road and the Canal will be able to access and exit the area from both directions. Only through traffic is not allowed. This would solve the issue with the access to businesses such as the Music School on Grove Park, access to the church and the facilitate the Meals on Wheels delivery service located on Richmond Hill.

A schematic of how this might work is attached.

I request that An Bord Pleanála consideration of alternative solutions, such as the one suggested, that would ensure a clear route for buses whilst providing more direct local access and reducing detours for private vehicles, a condition of the planning approval.

Shuttle system on Mountpleasant Avenue Upper:

I fear that the proposed shuttle system will result in vehicles mounting footpaths due to the road's dimensions, as was the case prior to the implementation of the no-entry for vehicles into Mountpleasant Avenue Upper in 2019:

- Due to the dimensions of the carriageway, the proposed shuttle system will not allow cars to pass each other at the proposed location for the shuttle system (traffic light #3), where the width of the carriage way measures just 4.3m. The Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors references the required carriageway width for local streets with a share surface carriage way as 4.8m.
- The proposed shuttle system does not adequately consider the impact of the cars entering Mountpleasant Avenue Upper from Richmond Hill further along the road. At present, the previous issue of cars mounting footpaths has reduced following the introduction of the no-entry from Richmond Hill. The proposed increase in bi-directional traffic flows will adversely affect the full length of the road, which has not been taken into consideration by the proposal.
- The proposal does not comply with the minimum requirement for pedestrian infrastructure and the provision of an accessible and inclusive road design. No widening of footpaths on Mountpleasant Avenue Upper to the required minimum recommended footpaths width (as per DMURS) of 2.0m, with an absolute minimum of 1.8m with permitted localised deviations only. According to the plans, the shuttle system traffic lights (#3 and #5) are proposed for installation on footpaths measuring <0.9m and c.1.0m wide respectively. Any increase in bi-directional traffic flow should only happen with enhanced pedestrian safety measures in place to make the road compliant with DMURS, in particular at the location of the proposed shuttle system and close to the busy junction near Belgrave Square. No disability audit has been undertaken for the proposed measures on Mountpleasant Avenue Upper. Designing for people with disabilities will be of particular relevance here as the nearby Gulistan Development will include a substantial element of senior housing.

I am fully supportive of the separate submission that is being made by a number of residents living in the Mountpleasant area which is highlighting those concerns in greater detail and am asking An Bord Pleanála to reject the re-introduction of the entry from Richmond Hill. I believe that the complete closure of the road to through traffic would have considerable benefits:

- Enhanced experience and pedestrian safety as the road is currently not fit for purpose for any through-traffic due to substandard pedestrian infrastructure
- Enablement of a 'greenway' cycle lane that runs parallel to the busier cycle lane on Rathmines Road
- Facilitation of the 'access only' proposal outlined above.

I request that An Bord Pleanála refuse approval of the proposed reintroduction of 2 way traffic on Mountpleasant Avenue Upper as a condition of the overall planning approval.

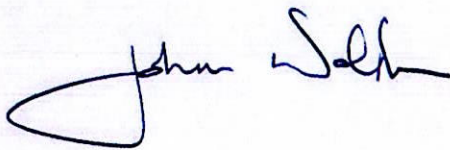
Other local access considerations

While it is important to remove through-traffic, local access by car needs to be maintained and should not result in lengthy detours where this can be avoided. On this basis I suggest the following:

- Local access to and from Rathmines Road could be enhanced by having a right turn onto Rathmines Road from Castlewood Road and a left-turn from Rathmines Road onto Castlewood. This would remove the reliance on Mountpleasant Avenue Upper, which is not suitable for any increase in traffic due to the limited carriage way and very narrow footpaths (<1m in some locations).
- The proposed "no right turn" from Cullenswood Road onto Ranelagh Road should also be carefully evaluated as this restriction will result in considerable detours and push traffic onto smaller residential roads.

The fee of €50 has been paid.

Kind regards

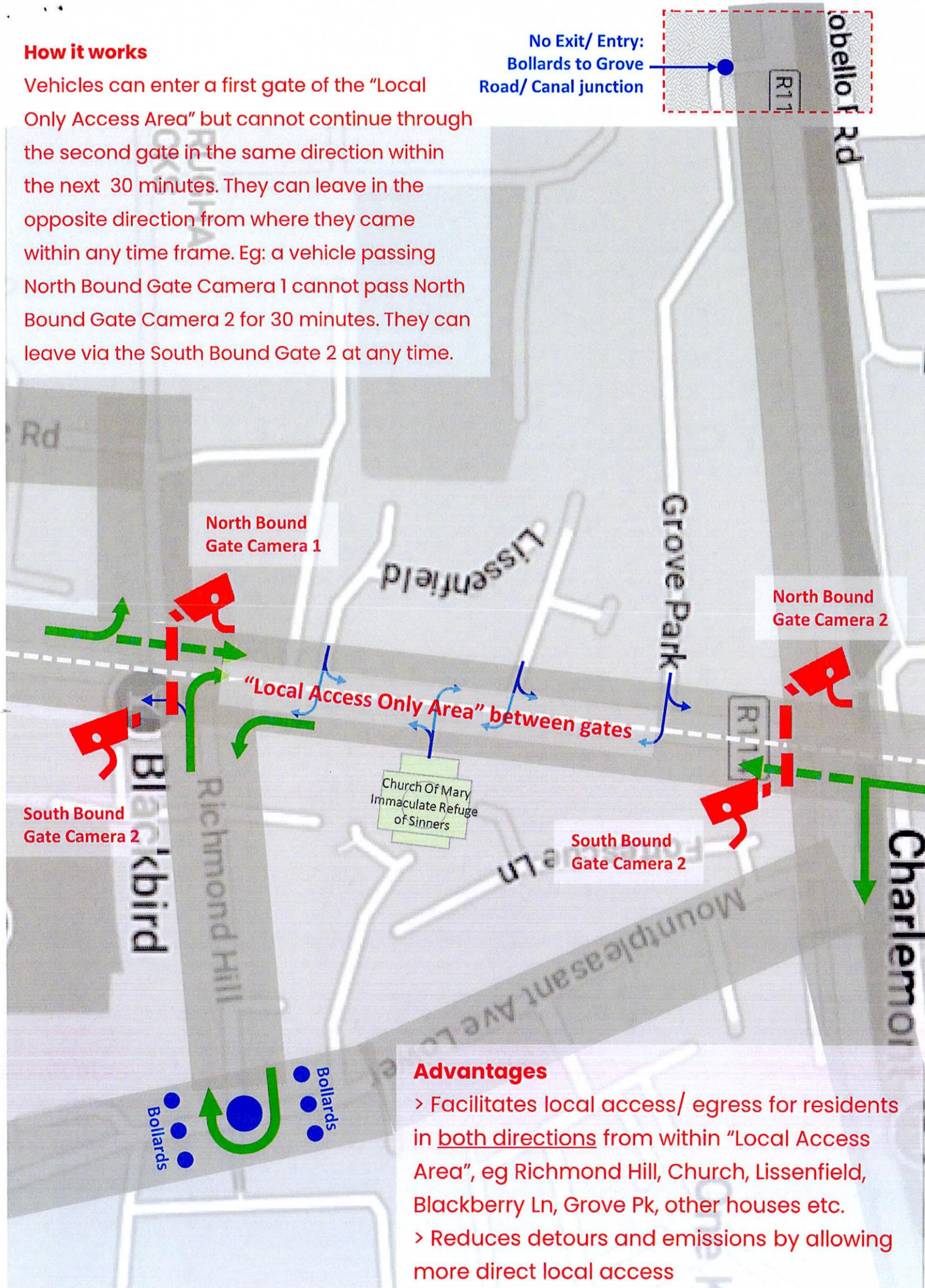
A handwritten signature in black ink, appearing to read 'John Walsh'. The signature is stylized with a large loop at the beginning and a cursive style for the rest of the name.

John Walsh

How it works

Vehicles can enter a first gate of the "Local Only Access Area" but cannot continue through the second gate in the same direction within the next 30 minutes. They can leave in the opposite direction from where they came within any time frame. Eg: a vehicle passing North Bound Gate Camera 1 cannot pass North Bound Gate Camera 2 for 30 minutes. They can leave via the South Bound Gate 2 at any time.

No Exit/ Entry:
Bollards to Grove
Road/ Canal junction



Advantages

- > Facilitates local access/ egress for residents in both directions from within "Local Access Area", eg Richmond Hill, Church, Lissenfield, Blackberry Ln, Grove Pk, other houses etc.
- > Reduces detours and emissions by allowing more direct local access