Our Case Number: ABP-316272-23

An Bord Pleanála

Claudia Gentile
136 Rathgar Road
Dublin 6

Date: 24 April 2024

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 note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the mean time, 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

HA02

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64 Marlborough Street
Dublin 1
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Kevin McGettigan

From: Eimear Reilly
Sent: Wednesday 10 April 2024 09:22
To: Kevin McGettigan
Subject: FW: Templeogue/Rathfarnham bus corridor

From: LAPS <laps@pleanala.ie>
Sent: Tuesday, April 2, 2024 10:06 AM
To: Eimear Reilly <e.reilly@pleanala.ie>
Subject: FW: Templeogue/Rathfarnham bus corridor

From: Claudia Gentile [redacted]
Sent: Thursday, March 28, 2024 4:04 PM
To: LAPS <laps@pleanala.ie>
Subject: Templeogue/Rathfarnham bus corridor

Case Reference Number ABP-316272-2328th March 2024An Bord Pleanála (Strategic Infrastructure Division),64 Marlborough Street,Dublin 1D01 V902laps@pleanala.ieTempleogue/Rathfarnham to City Centre Core Bus Corridor Scheme

Dear Sir or Madam,

As provided for under section 217B of the Planning and Development Act 2000, as amended, and inaccordance with your letter dated 23 February 2024, we wish to make a further submission to An Bord Pleanála (ABP) in relation to the submission dated 20th December 2023 received from the National Transport Authority (NTA).

I agree with the Rathgar Residents Association who have raised the following issues:

1. Impacts/costs of the Proposed Scheme outweigh the benefits.
2. Minimal bus journey time improvement
3. Inadequacies in the Consultation Process
4. Biodiversity a. Destruction of trees b. Flora and fauna
5. Architectural and cultural heritage
6. Noise and air pollution
7. Compulsory Purchase Order on Terenure Road East and Rathfarnham Road
8. Traffic redistribution due to proposed traffic management measures
9. Bus gate a. St Mary's college in Rathmines
10. One-way operation of Rathgar Road
11. Proposed turn bans
12. Negative effect on businesses a. Loss of street parking/ Loading bays
13. Width of Footpaths on Rathgar Road
14. Safety of proposed cycle tracks

15. Outdated Traffic Count Information
16. Changes to work/commuting patterns due to the COVID-19 pandemic
17. Trialling of the Proposed Scheme
18. Alternative options a. Metro b. School buses c. Congestion charges d. Park and ride facilities e. Cashless fare payment f. Bus priority traffic lights
19. No assessment of cumulative impact of 12 corridors
20. Routing of buses via Terenure Road North and Harold's Cross
21. Separate consultation on CBC10 and CBC12 3.219.2 Response to submission Detailed responses to the issues raised by this submission have been provided in Section 2.1.1, 2.4.3 and 2.5.3 of this report.'To be very clear, the concerns and issues raised by the Rathgar Residents Association have not been adequately or sufficiently responded to 'in Section 2.1.1, 2.4.3 and 2.5.3 of this report' or any other part of the NTA's submission.We note the NTA's equally lacking response to issues raised by the Rathgar Business Association and other members of the community. We, and all others who took the time to review and make submissions on the NTA's Busconnects road development planning application as submitted to ABP under section 51(2) of the Roads Act 1993 as amended, expected and merited a direct and satisfactory response by the NTA to the concerns raised.What is strikingis the similarities between the response received from the NTA now in its submission and in earlierNTA lead Busconnects 'public consultations' which were viewed by many as mere box- ticking exercises. There are very few answers given to any of the real concerns of the Rathgar Residents Association in the NTA's response and we look forward to those issues as highlighted in our initial submission to ABP being considered by the Board in full. The Rathgar Residents Association is very supportive of the requirement of safe cycling facilities and the need for good public transport. To that point,as we know,the Metrolink application is currently being considered byAn Bord Pleanála and we would like to take this opportunity to support the residents of Dublin South West and Rathgar who support the extension of the Metrolink from Stephens Green to Rathfarnham and Knocklyon. Dublin South West is the only area in Dublin not served by any rail infrastructure. A south west bound rail link would remove thousands of cars from our roads allowing freer movement of pedestrians, cyclist, and buses, unlike the Busconnects project, which shoehorns all road users onto 'corridors' and will cause traffic chaos. One of the most important questions posed by the Rathgar Residents Association on traffic modelling summarised by the NTA above as '19. No assessment of cumulative impact of 12 corridors' and whichhas glaringly not been answered by the NTA in this submission or indeed any previous NTA submission, is how will all Busconnects corridors running together affect surrounding roads and villages, and indeed the entirety of Dublin City. The NTA's piecemeal approach to traffic modelling, by modelling each corridor separately and individually, is highly flawed. Unless all corridors are modelled concurrently, the NTA do not know or cannot predict the true affects that these traffic restrictions and redistribution of historical commuter traffic routes will have on our city. Why has this question not been answered?We also take this opportunity to restate our vehement opposition to the archaic planning proposal of road widening in an historic city which results in the removal of historic fabric and mature trees and hedges in Rathgar, in particular on Terenure Road East, but also all along this corridor and across Dublin for a bus project which bases its analysis on outdated data. It is noteworthy that a bus priority traffic light that has been installed on Terenure Road East recently is working most efficiently. Why was a bus priority traffic light not trialled on initial public consultation phase when we called for non-invasive measures to be trialled and modelled thoroughly before road widening plans were considered? Noteworthy also is the lack of response to the Rathgar Residents Association's query summarisedin the NTA's submissionas '21. Separate consultation on CBC10 and CBC12'. The only time the words 'Separate consultation on CBC10 and CBC12' are mentioned in the NTA submission is in the summary of issues raised in other submissions. This lack of responsefrom the NTA with regards to this issue is not limited only to this issue. Why was this question not answered when it is so important as highlighted below?The NTA during the public consultation phases held separate consultations on the Busconnects Core Bus Corridor (CBC) 10 Tallaght/Templeogue and Core Bus Corridor (CBC) 12 Rathfarnham. When applying to ABP both CBCs were inexplicable merged, given the resultant implications, and sent forward to planning which means that all buses from both the Rathfarnham area and the Templeogue area will be sent through Rathgar and Rathmines. While the NTA keep stating that the Busconnects Infrastructure design changes which are being considered by planning are separate to the Busconnects Network redesign, in fact the merging of these two bus corridors and as a direct result their high volumes of buses, will have an even greaterimpact on the roads and the public realm of the Rathgar area. Just one of these bus corridors and its volume of high frequency buses directed through Rathgar would be appropriate to meet commuter demand and bus volumes could be tweaked as required in operating service. To add to the issue, the NTA

have commenced a new bus service, Busconnects Orbital S4 route, along Highfield Road in Rathgar which is causing issues for residents along Highfield Road. The high frequency of these buses is already having an impact of clogging the system in Rathgar even before the Rathfarnham and Templeogue proposed bus corridors are introduced. Combining the bus volumes of the Rathfarnham and Templeogue proposed bus corridors, two distinctly separate corridors as presented during the NTA's public consultation phase,at Terenure Cross and forcing that combined volume of buses down Terenure Road East and into Rathgar is a burden too great for the Rathgar area to take.Instead, one of these bus corridors should have been sent down Terenure Road North/Harolds Cross Road which is the original route of the Rathfarnham Quality Bus Corridor and the other corridor should have been directed through Rathgar. The NTA's proposals submitted to ABP results in an overloading and overburdening of buses through Rathgar and the stripping of a high frequency bus service along Terenure Road North/Harolds Cross Road which was the route of the Rathfarnham QBC into the city centre.One of the key issues referred to by the NTA above as '20. Routing of buses via Terenure Road North and Harold's Cross' that the Rathgar Residents Association and indeed many residents have pointed out since the initial stages of the NTA's public consultation process and which the NTA initially ignored and are now trying to make poor excuses for in their submission is that the NTA, from the very start of the Busconnects planning process/route selection stage, ruled out the Terenure Road North/Harolds Cross Road as a possible route due to the Bus Rapid Transit (BRT) and this remains an indisputable issue which remains to be adequately answered. The statements below come directly from the CBC Feasibility Study and Options Assessment Report, Rathfarnham to City Centre Core Bus Corridor (commenced in 2016 and completed in December 2017, conducted by DBFL Consulting Engineers and Transportation Planners on behalf of their client, the National Transport Authority of Ireland):'6.1.3 The Clongriffin – Tallaght BRT is of particular relevance to section 2 of the Rathfarnham CBC route. The CBC route should complement the BRT service but should not duplicate the potential routing of the Clongriffin – Tallaght BRT route, which is likely to travel via the Harold's Cross corridor as per the Transport Strategy for the GDA (2016 – 2035) and identified in Figure 1.2 of this report''4.4.29 It should be noted that in the case of route options which converge with other CBC, BRT or other public transport corridors the residential and employment population served by these different corridors have been deducted to avoid duplication of population figures.'As the BRT has now been replaced by the Busconnects Project, then the methodology for the Rathfarnham Busconnects Core Bus Corridor route selection through Rathmines and Rathgar Villages is based on considerations and constraints that no longer exist i.e. that Rathfarnham Busconnects route selection should not 'duplicate' the potential routing of the BRT.The NTA are now trying to cover their tracks on page 148 of the NTA's submission dated 20th December 2023 by stating:'The primary reason for this is the significantly stronger demand for bus along the Rathgar Road / Rathmines Road when compared to Harold's Cross Road. This route corridor serves the urban village of Rathmines, which is a significant trip attractor on southern side of the city. The strength of the high demand for bus in Rathmines compared to Harold's Cross Road is clearly evident from the extracts from the Dublin Area Bus Network Redesign Revised Proposal (October 2019) presented in Figure 4.27 and Figure 4.28. The patronage shown in Figure 4.27 is based on existing bus services.'The NTA's submission also states on Page 147 that 'Section 3.4.1.1.2.2 of Chapter 3 Reasonable Alternatives of Volume 2 of the EIAR identifies that consideration of the routing the corridor along Harold's Cross Road: Option of the CBC following Harold's Cross Road and connecting to the Kimmage to City Centre CBC. The primary reason that this option has not been progressed is the significantly stronger demand for bus along the Rathgar Road / Rathmines Road when compared to Harold's Cross Road. This route corridor serves the urban village of Rathmines, which is a significant trip attractor on southern side of the city. The strength of the high demand for bus in Rathmines compared to Harold's Cross Road is clearly evident from the extracts from the Dublin Area Bus Network Redesign Revised Proposal (October 2019)'The Combined Activity Density Map presented in Figure 4.28 of the Dublin Area Bus Network Redesign Revised Proposal (October 2019) referred to in the extract from the NTA's submission dated 20th December 2023 above based its data on the Central Statics Office Census 2011 data and the Busconnects Environmental Impact Assessment Report (EIAR) uses extracts from the Dublin Area Bus Network Redesign Revised Proposal (October 2019) on which to base its analysis on demand in Rathmines versus the Harolds Cross Road. The report states that 'Combined Activity Density (population,employment,and student enrolment density) indicates the total level of daily activity in an area, as most trips begin or end at a residence, workplace, commercial, or educational establishment.' Combined Activity Density Maps are very important at establishing real time requirement for public transport for an area rather than Daily Bus Patronage which is based on service levels available to an area rather than services required. The arguments set out in Page 150 and Page 151 of the NTA's submission are based on bus service available and not bus service proposed.On page 149 of the NTA's submission dated 20th December 2023, it states:'It is noted that the above graphic was based on the 2011 census. At the time of

writing this response, the 2022 census data was not yet available, however an updated combined activity density map has been prepared based on the 2016 census and is presented below, confirming that the demand has not changed in any significant way'.In fact, what the 'updated combined activity density map has been prepared based on the 2016 census'on Page 149 of the NTA's submission and referred to above does show is the distinct need for a bus corridor along Terenure Road North/Harolds Cross Road even in 2016,which importantly would also provide an interconnection between other Busconnects corridors (linking Kimmage/Rathfarnham/Templeogue) in the area which is a stated goal of the Busconnects Project. Did the NTA update their EIAR also when updating their CombinedActivity DensityMap based on 2016 census as opposed to the 2011 census?While it is strange that the NTA in 2019 had based their initial Busconnects route selection analysis on 2011 data, it is totally bewildering why it is not evident to them now thatTerenure Road North/Harolds Cross Road requires a bus corridor given the need shown in the 2016 data, coupled with the fact that in the last eight years since the 2016 data was captured, that the Terenure Road North/Harold's Cross Road has had an explosion of home building, commercial and school building projects which has a direct impact on population, education and employment levels in the area and hence bus/public transport requirements. The NTA's proposals amount to the removal of an adequate bus service to the Terenure Road North/Harold's Cross Road which has ample areas of Zoned Z1 Sustainable Residential Neighbourhoodin the environs either side of it and an overloading of two core bus corridors merged into one, which are proposed to be funnelled down Terenure Road East and into Rathgar which is largely Zoned Z2 Residential Neighbourhoods (Conservation Area).The Dublin City Development Plan 2022-2028 Mapset H shows the vast potential of building growth into the futurealong Terenure Road North/Harold's Cross Road whereas its glaringly obvious that this population growth potential is not possible along the corridor proposed down Terenure Road East, into Rathgar Village and down Rathgar Road, mainly designated a conservation area. It is also noteworthy that between 2011 and 2016, Ireland was in still in the grips of the fallout of the recession. The NTA is proposing a project for the past, not a solution for the future. In effect, by using Census 2016 population data, the NTA is essentially using pre 2008 recession data instead of mapping, computing, and predicting futurebus user volumes for the area. The Central Statistics Office's Census 2016 data is used throughout the project and not only as the NTA's paltry excuse as to why the shorter and more time efficient and historical route of the Quality Bus Corridor (QBC) from Rathfarnham to the City Centre along the Terenure Road North/Harold's Cross Road was not considered properly in the planning stages of this project. It is most significant that the NTA kept both the Templeogue and Rathfarnham to City Centre routes separate during public consultations, only joining them together when planning was brought to ABP.It is also noteworthy that Transport Infrastructure Ireland who are managing the proposed Metrolink Project on behalf of the NTA are using the Central Statistics Office Census 2022 data in their presentation to the An Bord Pleanála Metrolink Oral Hearing which commenced on the 19th February and which I attended. On page 149 of the NTA's Busconnects submission dated 20th December 2023, it states: 'It is noted that the above graphic was based on the 2011 census. At the time of writing this response, the 2022 census data was not yet available'. The NTA submission that we have been invited to respond to is dated not two months earlier the start of the Metrolink oral hearing. Why was the Census data 2022 available two months later in February 2024 and not in December 2023 orwhy didn't the NTA request to delay its response for another two months if the data wasn't available in December 2023 to ensure the most accurate response to guarantee the best outcome for the Busconnects project? Both Busconnects and Metrolink are huge public infrastructure projects and bothwill cost the taxpayers billions. How is it correct to base the planning application of one of those projects on Census 2022 data and the other on Census 2016 data and in particular census data on population? Also, Transport Infrastructure Ireland in their presentation to the An Bord Pleanála Metrolink Oral Hearing presented changes in the proposed project including to the Environment Impact Assessment Report (EIAR) since the railway order planning application was lodged to ABP in September 2022. Changes made to the EIAR since the original application include updates due to public policy changes, the new Greater Dublin Area Transport Strategy 2022-2042, the Cycle Network Plan 2022, climate legislation, new planning applications and planning updates near the proposed Metrolink alignment, and changes requested by ABP to the proposed planning.The Busconnects Project could have also benefited from these new amendments being included in its planning application by way of submission in the NTA's response dated 20th December 2023 which we have now been given an opportunity to respond to. It would have made the planning process more robust and less likely to been held up by judicial reviews in the future. However, we have been left with very little to respond to in the NTA's submission which reads like a data filing exercise where submissions are correlated and summarised with no genuine answers given. One would expect an AI generated response to have produced a more sincere effort to provide answers.The Rathgar Residents Association wrote to ABP to request an oral

hearing and we note in the Board's letter dated 23rd February that it has been decided not to hold one. We are disappointed that the Busconnects Project will not be presented by the NTA at an ABP oral hearing and the public not given an opportunity to respond as has been granted to the Metrolink Project. Indeed, throughout this process of very active engagement with the NTA since 2019, many residents have felt and still feel they have not been heard and this submission by the NTA reinforces that stance, given that it is 795pages of non-answers to residents and organisations that took the time to engage and make submissions on this planning application to ensure the best outcome to the process. An oral hearing would have provided a fair, balanced, and impartial public forum for the public to make submission.It is important to note that Busconnects has a far greater potential impact on Dublin and in particular its streetscape and public realm than an underground metro could ever have - precisely because it impacts on the surface. It will directly affect more trees and hedges, more historic features, more people, and more property than Metrolink which will run almost entirely underground.

Yours faithfully

Claudia Gentile