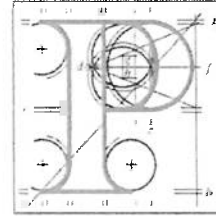


**Our Case Number:** ABP-316272-23



**An  
Bord  
Pleanála**

Margaret Silke  
67 Terenure Road East  
Rathgar  
Dublin 6  
D06 HP60

**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](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,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

To: An Bord Pleanála (Strategic Infrastructure Division)  
64 Marlborough Street  
Dublin 1  
DO1 V902

<b>AN BORD PLEANÁLA</b>	
LDG-	_____
ABP-	_____
25 MAR 2024	
Fee: €	<u>N/A</u> Type: <u>N/A</u>
Time: <u>15.01</u>	By: <u>Hanci</u>

**Case reference number: ABP-316272-23**

**Name and address: Margaret Silke, 67 Terenure Road East, Rathgar, Dublin 6**

I am the owner of 67 Terenure Road East and I am affected by the **Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme 2023**.

I wish to object to the Planning Application made in this connection by the National Transport Authority (NTA).

You will be aware of the fact that the NTA has published a document responding to submissions made by the public. The “responses” do not represent a genuine engagement with the submissions. In the same spirit as the process of “consultation” rolled out by the NTA, the “responses” are a box-ticking exercise which have no interest in permitting even small concessions to the original plan.

It beggars credibility in relation to the NTA submission to ABP of 20 December 2023 that not one point made in writing by hundreds of objectors has been accepted by the NTA. Is it credible that every single one of the numerous points made is incorrect and misled?

My objections to the Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme 2023 are as follows:

**1. The land take proposed for Terenure Road East (TRE) does not make sense when one considers the traffic volume repercussions of the broader Route 12 plan.**

A land take is proposed for Terenure Road East (TRE) to create a dedicated Bus Corridor. The following comments **exclusively** cover the run of houses from Argos House to Greenmount Road. The land take proposal for this run of houses does not make sense when one considers the traffic volume repercussions of the broader Route 12 plan.

An inevitable consequence of the Bus Gate initiative at Military Road (Rathmines) is a massive diversion of outbound traffic away from Rathmines, Rathgar and Terenure. Car traffic coming from town will be obliged to cross the canal at Clanbrassil Bridge (Harold's Cross) or Charlemont Bridge (Ranelagh) to “get home”.

Apart from people who actually live on TRE, most commuters will opt for an alternative route. To include TRE in one's outbound route will make no sense.

Only those living in the immediate area will attempt to enter Rathgar Village via Highfield Road and journey on via TRE. Using TRE as a through route will be hugely challenging, if not insane.

The NTA itself acknowledges this. It accepts that traffic volumes will be much reduced on TRE. In its published documentation ([www.templeogueathfarnhamscheme.ie](http://www.templeogueathfarnhamscheme.ie)) in Chapter Six (Traffic & Transport) on page 161, the NTA predicts an evening peak hour reduction of traffic on Rathgar Road from 782 to 70 and on Terenure Road East from 903 to 386.

Therefore, it is unnecessary to proceed with the proposed new bus corridor on that section of TRE from Argos House to Greenmount Road. A priority bus signalling approach – already in place and operating successfully - will do the job just as well at zero cost.

The bus signalling option had been in place unused for some years but has been activated since April 2022 or so and it is clear that it is working well. In general, outbound buses are travelling the length of TRE smoothly.

In essence, therefore, the NTA (as the acquiring Authority) has not established that there is a compelling need for that portion of the proposed works which I am highlighting (namely from Argos House to Greenmount Road) to proceed. The NTA has not demonstrated that the associated lands to be acquired for this portion of the proposed works are actually needed. Lastly, the NTA has not adequately considered or engaged with alternative solutions.

TRE has a significant natural and built heritage which should not be interfered with, if at all possible. By accepting the logic of the argument outlined above, the NTA will no longer have to remove original railings, stone boundaries, mature trees and parts of gardens.

It goes without saying that, **where possible**, the architectural heritage of our capital city and its few historic suburban villages must be preserved. Streetscapes from Victorian, Edwardian and Art Deco periods containing both listed and unlisted buildings deserve protection. We should never repeat the mistakes that ruined historic Dublin in previous decades.

The argument made above shows that we are in the realm here of “where possible”. It is possible, it is desirable and it is logically verifiable that the run of heritage houses adjoining Argos House can be and should be spared.

## **2. The consultative process pertaining to the Core Bus Corridor Scheme has been unfair and undemocratic.**

The Covid-19 pandemic and associated movement restrictions made it virtually impossible for communities to gather and discuss the impact of Bus Connects. Many people could not engage with virtual consultation rooms and were effectively excluded from the process. All in all, the public consultation was unsatisfactory and undemocratic.

Local political input from City and County Councillors to the Bus Corridor process appears to have been neutralised, paying little attention to formal local authority development plans. It seems that no consultation took place with the Dublin City Council (DCC) or South Dublin City Council (SDCC) conservation authorities regarding the impact of the NTA’s proposals on the historic heritage villages and communities of Rathmines, Rathgar, Terenure, Kimmage and Templeogue.

The NTA proposals openly conflict with the Dublin City Development Plan 2016 - 2023 for the future development of Dublin's villages and local communities.

Many members of the public feel that the NTA has not listened to local residents and business owners. The over-riding impression following extended private contact with its officials is that they are going through the consultation motions and have not listened to well-grounded concerns and objections.

The style of the consultation process has been infuriating. Piecemeal release of the network redesign and core bus corridors has diluted the public's capacity to meaningfully engage with the consultation phase and has had the effect of limiting opposition. In effect, the public consultation process has been orchestrated to limit the ordinary citizen's participation.

Members of the public are assured over and over again that all the information they require is on the Bus Connects website, but the layman finds that the available information is obscured by technical language, technical drawings, engineering-speak, etc. It is not possible to access data which is readily understandable.

**Under the Aarhus Convention** members of the public have a right to participate in a range of decisions where there may be an environmental impact. The Bus Connects project may be playing close to the wind in the arbitrary way it defines "consultation" (especially during the pandemic) and it is possible that a future appeal under the Aarhus Convention by disaffected members of the public may result in major scheduling setbacks for the NTA.

The NTA has made little effort to make simple effective communication its byword. Box-ticking "consultation" of this kind is profoundly undemocratic. It erodes faith in the important principle that public servants serve the public. It helps to generate ill-founded conspiracy theories. It leads to a feeling of helplessness in the minds of ordinary citizens. And it undermines the social contract.

### **3. There is no indication that the NTA's plan is robustly costed.**

The NTA puts the cost at €2 billion with exact final costs to be estimated. A trustworthy Cost Benefit Analysis is required; yet there is no clear data suggesting that the current proposals represent good value for money for the taxpayer. An overall improvement of 7 buses per hour (i.e. from the current 63 buses per hour to a projected 70 per hour) hardly seems to warrant such a massive investment. There also appears to be a major problem with bus capacity in terms of procuring bus stock and recruiting bus drivers.

In the aftermath of a pandemic which has **radically affected working patterns**, Bus Connects should be reappraised. A host of assumptions about population movements and traffic volumes are now questionable and pausing the plan seems not just desirable but imperative. In general, given the unreliability of historic public infrastructure costings, the NTA's plans and cost justification for the 12 Core Bus Corridors - for which statutory applications are now being made - are clearly of concern to taxpayers.

#### **4. Bus Connects seems to be an all or nothing plan.**

There is surely merit in trialling or implementing various aspects of the plan to verify the time or money-saving estimates. For example, the NTA itself says that a cashless bus network will provide up to 50% of the bus journey savings it is forecasting. The NTA estimates that the 7-8 minute improvements in peak time travel along the Rathfarnham corridor will be achieved primarily by implementing priority signalling and cashless fares (as there are already significant bus lanes along the route). So why not press ahead first with the cashless bus initiative? This will enable the NTA to put together a transparent budget for this aspect of Bus Connects, to implement this phase, to verify the time savings and all in all to compare its current claims and forecasts with a real world outcome (in advance of spending billions).

In general, so as to be more transparent with the public, the NTA Bus Connects Plan should clearly separate time savings brought about by creative low cost measures and time savings brought about by the proposed bus corridor infrastructure per se. The cost benefits of a Bus Connects Plan minus the low cost measures (which can go ahead independently) may not be compelling.

On a wider issue, the NTA's focus on Bus Connects fails to plan for long term strategies that will serve the south west city more favourably, not just in the short term but well into the future. The ideological resistance of the NTA to the logical long term solution to Dublin's transport issues – an underground metro – is not in the public interest. There is a strong possibility that by the time this project is completed it will be obsolete and population growth will necessitate a more sustainable solution.

#### **5. Once the landscape and fabric of the historical suburbs is changed, there is no going back.**

The significant alteration to transport patterns arising as an outcome of the pandemic suggest alternative solutions must be considered by the NTA, as opposed to the destructive impact of bus corridors on the residential roads of this historic area. One also queries the benefits of the minimal bus journey time saved on the Rathfarnham Road section when contrasted with the enormous cost of compulsory purchase compensation and associated construction.

The architectural heritage of our capital city and its few historic suburban villages must be preserved. Streetscapes from Victorian, Edwardian and Art Deco periods containing both listed and unlisted buildings deserve protection. We should never repeat the mistakes that ruined historic Dublin in previous decades.

The implications for side roads of rat-running (to avoid bottlenecks and one-way road systems along the proposed routes) further compromise these heritage areas.

#### **6. The NTA is approaching the project in a very technocratic fashion instead of exhausting all the "common sense" ideas first.**

The proposed massive infrastructure programme needs to be paused. In its place, the NTA should run a major trial (for at least six months) deploying a package of low cost measures, and evaluating the impact of this package before going any further with the high cost aspects of Bus Connects. Here are a number of ideas which might be included in this package of measures:

- (a) introduce the proposed cashless buses system

- (b) introduce hefty fines for drivers of vehicles which encroach illegally on the bus corridors – at least €1,000 plus penalty points for each offence [and enable buses to have cameras on board which provide evidence of such offences, with fine notices going automatically to owners of the vehicle number plates in question]
- (c) provide more buses at peak demand times
- (d) consider later start times for schools and universities, thus evening out traffic flow over the current artificially intense peak hours
- (e) retain independent traffic management consultants to look at traffic flow in the city and, in particular, at inadequate management of traffic light synchronisation and adjustment where delays and build-ups occur [why not transfer traffic light management to a private entity? There is a suspicion on the part of motorists that DCC wants to create congestion along certain routes, and that such manipulation generates traffic figures supporting NTA and DCC policy preferences]
- (f) put mandatory school bus transport in place to reduce the volume of cars bringing children to school
- (g) introduce congestion charges
- (h) establish Park and Ride locations with a free ongoing bus service
- (i) deploy a specific corps of traffic management staff to get to grips with poor driving habits, traffic offences, faulty traffic light synchronisation and change times, counter flow/ intelligent bus priority signalling, breaches of congestion charge laws, etc.

In this context, the NTA should be asked to detail the level of consultation which has occurred to date with the people responsible for monitoring traffic flow, namely the Dublin Regional Traffic Control Centre. The NTA should also detail the ongoing level of consultation with the DRTCC which will obtain.

**7. The Rathfarnham to City Centre corridor will introduce a new right turn for buses, taxis and bicycles at Terenure Cross, from Rathfarnham Road towards Rathgar via Terenure Road East.**

This will add an extra traffic light sequence to an already complex junction, reducing time available for vehicles from Terenure Road West/Templeogue Road to move across the junction. The diversion of buses coming from Rathfarnham down TRE instead of proceeding to Harold's Cross seems justifiable only in terms of NTA & Dublin Bus convenience. Adding an additional 12 right-turning buses per hour to what will now be an extraordinarily busy route (totalling 72 buses per hour going through Rathgar) makes administrative sense but not “real life” sense to the residents affected.

However, if this measure is set in stone, it is unwise to permit taxis and cyclists to turn right at Terenure Cross. Such a measure will wreak havoc at the Cross and guarantee local traffic congestion at even nominally quiet times of the day.

**8. Overall, the scope of the Bus Connects plan is excessive – providing a 24/7 plan for a 4 to 6 hour problem.**

Beyond rush hour, traffic flows freely. The NTA should examine the necessity for certain aspects of the Route 12 proposal to operate for most of the day. For example, must the Bus Gates operate for 14 hours a day (6 am to 8 pm)?

### **9. Cycling arrangements are unsatisfactory and piecemeal in many places.**

The proposed arrangements give the illusion of a plan when in reality the lookout for cyclists is both chaotic and dangerous. Allowing cyclists to turn right at Terenure Cross onto Terenure Road East, for example, is unsafe.

It is puzzling how the much vaunted “segregated cycling lanes” will be kept segregated (i.e. unoccupied by cars parking or pausing). To be fair to cyclists, they cannot be blamed for expecting cycling lanes to be reserved for exclusive cycling use. The Camden Street / Georges Street area is especially chaotic for cyclists, with many businesses operating along this route such that loading bays are extremely busy.

Several of the cycling campaign groups have indicated what is already obvious - cyclists will always take the most direct route. They will not take a circuitous alternative (i.e. where no cycling lane is provided and a diversion is recommended and put in place). Any proposed “diversions” are not credible.

### **10. The inevitable creation of rat-running to avoid bottlenecks and one-way road systems along the proposed routes will seriously compromise the safety of local residents of all ages.**

Many of the routes under threat of increased traffic volumes are local suburban roads, some of which also contain schools. They were never designed or intended to carry the anticipated traffic volumes arising from displaced through-traffic.

The NTA’s bus corridor model assumes that impacted traffic can be streamed onto neighbouring radial roads. The logic of this approach is founded on a grid-based street model. Such models come unstuck where the proposed orbital routes do not have the capacity to accommodate the proposed volume of traffic or where the orbital options ultimately lead back towards the same downstream bottlenecks.

While it is difficult to assess the likely level of extra traffic that will try to use residential streets to bypass the bus gates on their journeys to and from the city, it should not be beyond the capability of the design team to provide modelling scenarios which forecast various “rat-running” possibilities. The planners should also make it plain where all the heavy goods vehicles are going to be diverted: this is an issue studiously avoided in the NTA documentation.

### **11. The combined impact on private cars of the bus gate at Military Road and the one-way system on Rathgar Road are very profound.**

Locals driving into town will only have two access options – turning right onto Castlewood Avenue (opposite the Stella Cinema) or going through Harold’s Cross. Locals driving out of town will have to cross the Canal at either Harold’s Cross Bridge or Charlemont Bridge (Ranelagh).

All of these inbound and outbound options guarantee congestion. The NTA must flesh out this part of its plan in modelling terms and describe clearly what they reckon will happen in a post-Bus Connects world. The planners should go through various scenarios – for example, travelling by car from Christchurch to Harold’s Cross Bridge to Terenure to Rathfarnham; and travelling by car from Camden Street to Charlemont Bridge to Ranelagh and on to Terenure and Rathfarnham. These journeys should be modelled in off peak as well as peak traffic scenarios.

The NTA needs to spell out (under various location scenarios) how elderly residents will find their way home from Rathmines by car if they live on or adjacent to Rathgar Road or Terenure Road East. The full implications of the bus gate and one-way system proposals are not being spelt out. [Equally, no attempt is being made to model various likely traffic outcomes to residents of Castlewood Avenue and the Mount Pleasant area].

A particular issue arises on Rathgar Road. Between cyclists heading downhill towards Rathmines at high speed and frequent buses travelling at relatively low speeds, it will be a very tricky operation for residents to emerge safely in their cars onto the roadway.

A number of vulnerable elderly people are affected by possible compulsory purchase orders. They are learning of the proposed developments only by means of technical communications from the NTA. They have not yet been approached by a human being. (Other residents whose property is affected - and who would not regard themselves as vulnerable - are having great difficulty arranging personal meetings with an NTA representative to have the implications explained to them).

A further significant point relates to the **independent** traffic modelling put in place by the NTA for each of the routes Templeogue/Rathfarnham to City Centre; Kimmage to City Centre; and Tallaght/Clondalkin to City Centre. No attempt has been made so far to arrange **integrated modelling** (i.e. the cumulative and inter-related impact of these three routes working together). Until this critical level of modelling is provided, the potentially chaotic impact generated by all the proposed measures being implemented at the same time will be masked.

Thank you for giving your time and attention to this letter of objection.

*Margaret Silke*

Margaret Silke  
67 Terenure Road East  
Rathgar  
Dublin DO6 HP60

25 March 2024