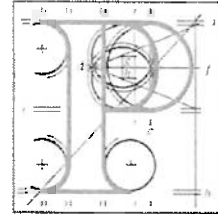


**Our Case Number:** ABP-316272-23



**An  
Bord  
Pleanála**

Mark Duggan and Maria and Brian Bilings  
320 Orwell Park Glen  
Templeogue  
Dublin 6W

**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
Glaó 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

## Kevin McGettigan

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**From:** Eimear Reilly  
**Sent:** Wednesday 10 April 2024 09:20  
**To:** Kevin McGettigan  
**Subject:** FW: Case Ref. ABP-316272-23 Templeogue/Rathfarnham Bus Corridor  
**Attachments:** Submission 28 Mar 2024 ABP-316272-23.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** LAPS <laps@pleanala.ie>  
**Sent:** Thursday, March 28, 2024 3:54 PM  
**To:** Eimear Reilly <e.reilly@pleanala.ie>  
**Subject:** FW: Case Ref. ABP-316272-23 Templeogue/Rathfarnham Bus Corridor

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**From:** Mark Duggan <[REDACTED]>  
**Sent:** Thursday, March 28, 2024 3:48 PM  
**To:** LAPS <laps@pleanala.ie>  
**Cc:** [REDACTED]  
**Subject:** Case Ref. ABP-316272-23 Templeogue/Rathfarnham Bus Corridor

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it concerns:

Please find attached a submission regarding the above case from Mark Duggan, Maria Billings, Brian Billings.

An Bord Pleanála  
Strategic Infrastructure Division  
64 Marlborough Street  
Dublin 1 (D01 V902)

28/03/2024

**Re: Bus Connects Templeogue/Rathfarnham to City Centre Bus Corridor Scheme - case ABP-316272-23**

Dear Sir/Madam,

Following our, Mark Duggan, 320 Orwell Park Glen, and Maria and Brian Billings, 2 Orwell Park Glen, Templeogue Dublin 6W, submission of 10<sup>th</sup> Aug 2023 re the above scheme, An Bord Pleanála, by letter of 23<sup>rd</sup> Feb 2024, invited us to make a submission in response to the submission of 20<sup>th</sup> Dec 2023 from the National Transport Authority (NTA).

We are disappointed that we have been given such little time to respond to such a large amount of documentation provided by the NTA.

In our original submission we outlined that the NTA had not addressed (i) the issue of buses travelling through College Green or (ii) the issue of increased volume of buses travelling to and from the city centre along the quays.

In the NTA submission of 20<sup>th</sup> Dec 2023 section 3.164614 "Mark Duggan and Maria and Brian Bilings" (sic), paragraph 3.164.2, the NTA say that a detailed response to these issues is addressed in Sections 2.1.1 and 2.2.3 of their report.

In section 2.1.1.4 of their submission entitled "No consideration of what happens buses in the City Centre" the NTA state "*In meeting its objectives, the Proposed Scheme will deliver strong positive impacts in terms of promoting active travel and sustainable transport. This is demonstrated in the traffic modelling undertaken, the results of which are presented in Chapter 6 of the EIAR. It is noted that this modelling includes the movement of buses to and through the city and centre, and as such the benefits include the consideration of buses moving through the city centre.*"

In Appendix 1 of this (our) submission are some pages from Chapter 6 of the Environmental Impact Assessment Report (EIAR) referred to by the NTA. The traffic modelling undertaken by Jacobs ARUP Systra regarding the Templeogue/Rathfarnham to City Centre Bus Corridor ends at the junction of South Great George's Street and Dame Street. (We note that the modelling undertaken for the Liffey Valley to City Centre Core Bus corridor ends at Winetavern Street/Christchurch – ref. ABP HA29S 314056 – see Appendix 2). Therefore, it is incorrect of the NTA to say that the modelling "*includes the movement of buses to and through the city and centre.*" Further, since the modelling of the Liffey Valley to City Centre Bus Corridor ends at Winetavern Street/Christchurch it is clear that the

combination of bus corridors travelling to and through the city centre have not been modelled or assessed.

It is misleading of the NTA to state that traffic modelling with regard to the Templeogue/Rathfarnham to City Centre Bus Corridor Scheme "*includes the movement of buses to and through the city and centre.*" We, therefore, make the following points:

1. As no modelling of traffic for the Dame Street/College Green nor for the North/South Quays areas has been done for this Bus Corridor Scheme the application by the NTA should be rejected.
2. As no modelling of traffic for the combined Liffey Valley to City Centre and Templeogue/Rathfarnham to City Centre Bus Corridors for the Dame Street/College Green nor for the North/South Quays areas has been done the application by the NTA for the Templeogue/Rathfarnham Bus Corridor should be rejected.
3. The response by the National Transport Authority in their submission of 20<sup>th</sup> Dec 2023 is disingenuous and entirely inadequate in addressing (i) the issue of buses travelling through College Green and (ii) the issue of increased volume of buses travelling to and from the city centre along the quays as detailed in our submission of 10<sup>th</sup> Aug 2023 and, therefore, the application by the NTA should be rejected.

Further, in regard to this issue we reassert what we stated in our original submission of 10<sup>th</sup> Aug 2023, namely,

The proposed *BusConnects* Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme (ABP Case No. 316272) ends at the junction of South Great George's Street and Dame Street. This scheme does not show how buses arriving at this junction will then travel through the city centre to their destinations. **This is bad planning as it is not planning at all and, therefore, the application should be rejected.**

The current city-wide *BusConnects* network indicates that buses arriving at the junction of Sth Great George's St and Dame St will turn right and pass through College Green. However, on 5<sup>th</sup> Aug 2023, Dublin City Council, on its web site, states that it is holding "an international competition to procure an Architect Led Multi-disciplinary Design Team for the College Green Dame Street Public Realm Project". This will see the area from the George's St/ Dame Street junction to College Green traffic free.

This would indicate a conflict of intention between the *BusConnects* designers and Dublin City Council regarding what is planned for the College Green area. **Until this conflict is resolved the application should be rejected.**

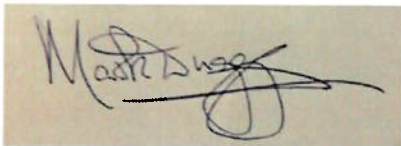
Should the applicant decide that buses arriving at the Sth Great George's St / Dame St junction will turn left (and head towards Parliament St / Christchurch), the applicant must indicate how the buses will then travel through the city centre. **Without such indication, the application should be rejected.**

In the latest *BusConnects* city-wide network, buses on the G spine (from Thomas St) and D spine (from Cork St/Patrick St) travel under Christchurch Arch onto the north quays. If the College Green Plaza should go ahead and prevent traffic from crossing it in an east-west direction, buses from the A spine (from Templeogue /Rathfarnham) must then, at some point, join the traffic on the north quays from the G and D spines as well as buses from the B and C spines that service the north and west of the city. The applicant has not explained how the north quays from Ormond Quay to O'Connell Bridge will cope with the volume of buses that will be using this route. **Without such an explanation the application should be rejected.**

All the buses that travel into the city centre along the north quays must at some time return to the suburbs from which they came. If College Green is closed to east-west traffic, the returning bus will most likely be expected to return along the south quays between O'Connell Bridge and Capel Street Bridge / Parliament Street along Wellington Quay. However, the junction of Wellington Quay and Parliament Street is very constricted and has just two traffic lanes with no scope for widening as the footpath is quite narrow at this junction. Buses travelling on the A spine (Templeogue /Rathfarnham) will be required to use this route. **Without an explanation of how the south quays will handle the additional volume of buses that will travel along this route the application should be rejected.**

With regard to the College Green Plaza, it should be noted that previous plans for the pedestrianised plaza were rejected by An Bord Pleanála in 2018, due to concerns about the "significantly negative impacts" it would have on bus movements and on traffic, particularly on the city quays.

Yours sincerely,



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Mark Duggan



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Maria Billings



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Brian Billings

## APPENDIX 1.

Extract from National Transport Authority submission of 20<sup>th</sup> Dec 2023  
Templeogue/Rathfarnham to City Centre Bus Corridor Scheme Appendix A 6.2  
Transport Modelling Report page 9 showing the modelling end point at South Great  
George's Street / Dame Street junction.

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Appendices

**Jacobs**  
**ARUP SYSTRA**



Diagram 3.2 Proposed Scheme Microsimulation Model Network

Extract from National Transport Authority submission of 20<sup>th</sup> Dec 2023  
Templeogue/Rathfarnham to City Centre Bus Corridor Scheme Appendix A6.2  
Transport Modelling Report pages 21-23 showing the Junction Turning Points  
comprising the modelling and which end at South Great George's Street / Dame  
Street junction – see 12-48 below.

**Table 5.2 JTC Locations**

JUNCTION IDENTIFIER	JUNCTION NAME	TYPE	DAILY MOVEMENTS	AM MOVEMENTS	PM MOVEMENTS
10-1	Templeogue Road/Spreewell Link Road	Priority	59,414	4,242	4,594
10-2	Templeogue Road/Cheeversdown House	Priority	30,722	1,868	2,140
10-3	Templeogue Road/Corrybeg	Priority	29,633	1,869	2,099
10-4	Templeogue Road/Cypress Grove	Signals	40,104	2,738	2,994
10-5	Templeogue Road/Templeogue Business Centre	Priority	18,255	1,115	1,333
10-6	Templeogue Road/Maxol Exit	Priority	18,614	1,145	1,365
10-7	Templeogue Road/Riverside Cottages	Priority	18,500	1,146	1,368
10-8	Templeogue Road/Springfield Ave	Signals	33,975	2,519	2,577
10-9	Templeogue Road/Springfield Road	Priority	19,242	1,523	1,389
10-10	Templeogue Road/Bushy Park House	Signals	22,818	1,981	1,701
10-11	Templeogue Road/Rathdown Ave	Priority	17,597	1,339	1,250
10-12	Templeogue Road/Rathdown Park	Priority	14,688	946	1,077
10-13	Templeogue Road/Fergus Road	Priority	14,141	923	1,042
10-14	Terenure PI/Templeogue Road	Signals	22,763	1,548	1,621
10-15	Maxol Entrance/ Templeogue Road	Priority	18,635	1,133	1,346
10-16	Wainsfort Road/Templeville Road	R4	33,754	2,320	2,654
10-17	Fortfield Road/Fortfield Road	Priority	19,014	1,260	1,437
10-18	Greenlea Road/Fortfield Road	Priority	81,91	1,032	632
10-19	Kimmage Road/Terenure Road	Signals	34,672	2,665	2,577
10-20	Terenure Road/Greenlea Road	Signals	10,781	876	828
10-21	Wainsfort Road/College Dr	Priority	18,677	1,225	1,369
10-22	Fortfield Road/College Dr	Priority	8,927	1,153	670
10-23	Old Bridge Road/Butterfield Ave	Signals	30,242	2,423	2,395
10-24	Fairways/Butterfield Ave	Signals	19,395	1,596	1,412
10-25	Dodder View Road/Fairways	Signals	23,113	1,892	1,833
10-26	Templeogue Road/The Morgue Carpark	Priority	18,037	1,111	1,328
10-27	Wainsfort Road/College Park	Priority	17,990	1,191	1,342
10-28	Templeogue Road/The Morgue Carpark	Priority	18,436	1,129	1,318
12-1	Templeogue Road/Springfield Ave	Signals	24,661	1,721	1,913
12-2	Grange Road/St Mary's Boys National School	Priority	18,799	1,230	1,439
12-3	Rathfarnham Road/ Grange Road	Signals	25,588	1,744	1,990
12-4	Rathfarnham Road/ Rathfarnham Road	Signals	26,725	1,829	2,060
12-5	Rathfarnham Road/Castleside Drive	Signals	20,265	1,378	1,594
12-6	Rathfarnham Road/Rathfarnham Road	Priority	17,425	1,233	1,358
12-7	Rathfarnham Road/Dodder Park Road	Signals	37,170	2,591	2,837
12-8	Rathfarnham Road/Rathfarnham Road	Signals	20,442	1,631	1,464
12-9	Rathfarnham Road/Bushy Park Road	Signals	20,888	1,758	1,511
12-10	Rathfarnham Road/Rathfarnham Road	Priority	14,804	1,177	1,064
12-11	Rathfarnham Road/Beechlaw Way	Priority	15,513	1,198	1,062



JUNCTION IDENTIFIER	JUNCTION NAME	TYPE	DAILY MOVEMENTS	AM MOVEMENTS	PM MOVEMENTS
12-12	Terenure Cross	Signals	34,978	2,509	2,426
12-13	Terenure Road E/Terenure Road E	Priority	17,343	1,128	1,232
12-14	Terenure Road E/St Josephs Church	Priority	16,411	1,123	1,154
12-15	Healthfield Road/Terenure Road E	Priority	17,445	1,229	1,207
12-16	Terenure Road E/Car Park Entrance	Priority	16,645	1,177	1,150
12-17	Brighton Road/ Terenure Road E	Priority	17,724	1,271	1,208
12-18	Rathgar Road/Orwell Road	Signals	29,697	2,237	2,201
12-19	Rathgar Road/Highfield Road	Signals	23,906	1,855	1,706
12-20	Rathgar Road/Rathgar Road	Priority	17,358	1,211	1,339
12-21	Rathgar Road/Garville Road	Priority	19,074	1,364	1,495
12-22	Rathgar Road/Frankfort Ave	Signals	21,479	1,540	1,717
12-23	Rathgar Road/Rathgar Road	Signals	17,637	1,258	1,322
12-24	Charleville Road/Rathgar Road	Signals	22,808	1,510	1,680
12-25	Rathgar Road/Rathmines Road Upper	Signals	29,681	1,964	2,166
12-26	Rathmines Road Lower/Rathgar Road	Signals	27,830	1,972	2,031
12-27	Rathmines Road Lower/Gastlewood Ave	Signals	27,938	1,509	2,000
12-28	Rathmines Road Lower/Rathmines Road Lower	Signals	23,885	1,505	1,802
12-29	Rathmines Road Lower/Parker Hill	Priority	23,371	1,978	1,780
12-30	Rathmines Road Lower/Observatory Ln	Priority	22,135	1,743	1,713
12-31	Rathmines Road Lower/Richmond Hill	Priority	24,247	1,927	1,848
12-32	Rathmines Road Lower/Rathmines Road Lower	Priority	18,693	1,435	1,480
12-33	Rathmines Road/Grove Road	Signals	35,983	2,942	2,624
12-34	Richmond St/Charlemont Mall	Signals	19,506	1,775	1,551
12-35	Richmond St/Gordon Place	Priority	17,068	1,183	1,285
12-36	Camden St Upper/Harcourt Road	Signals	35,476	2,400	2,347
12-37	Camden St Upper/Charlotte Way	Signals	34,895	2,282	1,999
12-38	Camden St Lower/Camden St Lower	Signals	23,120	1,298	1,591
12-39	Camden St Lower/Camden Pl	Priority	22,193	1,251	1,460
12-40	Wexford Road Road/Montague St	Priority	22,982	1,295	1,530
12-41	Redmonds Hill/Cuffe St	Signals	36,405	2,294	2,058
12-42	Aungler St/Digges St Upper	Priority	21,216	1,314	1,258
12-43	Aungler St/York St	Signals	20,359	1,245	1,237
12-44	Aungler St/LongfoRoad St Lower	Signals	22,641	998	1,591
12-45	South Great Georges St/Stephen St Lower	Signals	20,379	1,050	1,363
12-46	South Great Georges St/Fade St	Priority	17,845	819	1,128
12-47	South Great Georges St/Erchequer St	Priority	17,951	854	1,194
12-48	Dame St/South Great Georges St	Signals	26,316	1,482	1,678
12-49	Mountpleasant Ave Upper/Charleston Road	Signals	15,865	1,089	1,214
12-50	Harold's Cross Road/Kenilworth Square N	Signals	28,124	2,239	2,022
12-51	Harold's Cross Road/Leinster Road	Signals	20,348	1,494	1,361
12-52	Mountpleasant Ave Lower/Mountpleasant Ave Upper	Priority	6,022	722	359

JUNCTION IDENTIFIER	JUNCTION NAME	TYPE	DAILY MOVEMENTS	AM MOVEMENTS	PM MOVEMENTS
12-53	Canal Road/Mountpleasant Ave Lower	Priority	20,918	1,791	1,457
12-54	Harold's Cross Road/Brighton Square	Priority	16,361	1,501	1,161
12-55	Rathmines Road Upper/The Turrets	Priority	10,643	889	898
12-56	Rathmines Road Upper/Rathmines Road Upper	Priority	11,345	963	902
12-57	Rathmines Road Upper/Cowper Mews	Priority	12,556	1,178	1,047
12-58	Rathmines Road Upper/Palmerston Park	Signals	17,882	1,360	1,432
12-59	Villiers Road/Highfield Road	Priority	6,688	567	450
12-60	Neville Road/Highfield Road	Priority	6,913	587	474
12-61	Templeogue Ave/Highfield Road	Priority	7,954	740	517
12-62	Grosvenor Road/Grosvenor Road	R3	7,176	672	570
12-63	Garville Ave/Rathgar Ave	Signals	8,784	927	754
12-64	Castlewood Ave/Castlewood Park	Priority	10,302	710	697
12-65	Belgrave Square N/Belgrave Square W	Priority	9,555	696	658
12-66	Charleston Road/Charleston Road	Priority	12,216	795	996
12-67	Ranelagh Road/Cullenswood Road	Signals	23,000	1,756	1,588
12-68	Ranelagh Road/Mountpleasant Pl	Priority	16,395	1,283	1,299
12-69	Ranelagh Road/Northbrook Road	Priority	16,556	1,328	1,270
12-70	Ranelagh Road/Dartmouth Road	Priority	16,390	1,335	1,307
12-71	Charlemont Bridge/Grand Parade	Signals	31,903	2,493	2,351
12-72	Charlemont St/Charlemont Pl	Signals	18,027	1,780	1,635
12-73	Harcourt St/Adelaide Road	Signals	24,858	1,343	1,779
12-74	Harcourt St/Hatch St	Signals	20,923	1,387	1,292
12-75	St Stephens Green (W)/St Stephens Green (S)	Signals	26,110	1,621	1,978
12-76	Terenure Road N/Whitton Road	Priority	15,335	1,379	1,059
12-77	Harold's Cross Road/Brighton Sq	Priority	15,723	1,517	1,064
12-78	Main St/Butterfield Ave	Signals	14,100	1,026	1,119
12-79	Kenilworth Sq/Rathgar Ave	Priority	8,436	646	746
12-80	Brighton Sq (E)/Garville Ave	Priority	4,124	588	397

## APPENDIX 2

Extract from National Transport Authority Liffey Valley to City Centre Core Bus Corridor Scheme Appendix 6.2 Transport Modelling Report page 10 showing the modelling end point at Christchurch Cathedral – ref. ABP HA29S 314056

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**Jacobs**  
**ARUP SYSTRA**



Diagram 3.2: Proposed Scheme Microsimulation Model Network

Extract from National Transport Authority Liffey Valley to City Centre Core Bus Corridor Scheme Appendix 6.2 Transport Modelling Report page 21 showing the Junction Turning Points comprising the modelling and which end at Winetavern Street/Christchurch - see 7.34 below.

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Appendices

**Jacobs**  
**ARUP SYSTRA**

Table 5.2: JTC Locations

JUNCTION IDENTIFIER	JUNCTION NAME	TYPE	DAILY MOVEMENTS	AM MOVEMENTS	PM MOVEMENTS
7-1	Fonthill Road/Liffey Valley Red Car Park	Roundabout	7316	218	479
7-2	Fonthill Road/Liffey Valley Yellow Car Park	Roundabout	22602	591	1626
7-3	Fonthill Road/Liffey Valley Green Car Park	Roundabout	36002	1201	2275
7-4	Fonthill Road/Liffey Valley service access	Roundabout	26854	850	1932
7-5	Fonthill Road/Liffey Valley B&Q access	Roundabout	28023	888	2007
7-6	Fonthill Road/Coldcut Road	Signals	37604	1913	2839
7-7	Coldcut Road/Cloverhill Road	Signals	32362	2190	2150
7-8	Kennelsfort Road/Ballyfermot Road	Signals	29816	2024	1984
7-9	Ballyfermot Road/Cherry Orchard Football	Signals	19873	1231	1370
7-10	Ballyfermot Road/Cifden Road	Priority	19119	1205	1005
7-11	Drumfinn Road/Ballyfermot Road	Signals	22009	1497	1155
7-12	Le Fanu Road/Ballyfermot Road	Signals	26861	1966	1591
7-13	Chapelzod Hill Road/Kylemore Road	Signals	18646	1707	1294
7-14	Kylemore Road/Ballyfermot Road	Priority	34646	2422	2314
7-15	St Laurence's Road/Sarsfield Road	Priority	17346	1261	1367
7-16	Sarsfield Road/Landen Road	Signals	17705	1364	1375
7-17	St Marys Ave W/Sarsfield Road	Signals	17453	1386	1361
7-18	Con Colbert Road/Sarsfield Road	Signals	17418	1373	1303
7-19	Inchicore Road/Grattan Cres	Signals	18725	1342	1398
7-20	R839 Grattan Cres/R810 Emmet Road	Signals	27354	1803	1855
7-21	Memorial Road/Inchicore Road	Signals	14005	829	1114
7-22	Emmet Road/St Vincent Street W	Priority	18504	1300	1188
7-23	Emmet Road/Buflin Road	Priority	18481	1263	1176
7-24	Emmet Road/Luby Road	Priority	13385	862	825
7-25	S Circular Road/Old Kilmainham	Signals	32278	2237	1913
7-26	Shannon Terrace/Old Kilmainham	Priority	14758	873	826
7-27	Bow Lane W/James Street	Signals	23773	1688	1571
7-28	James Street/Echlin Street	Priority	25184	1798	1532
7-29	Walling Street/R810 Thomas Street	Signals	23876	1682	1508
7-30	Bridgefoot Street/Thomas Street	Signals	31374	2211	2028
7-31	R810 Thomas Street/Meath Street	Signals	25003	1824	1536
7-32	Commarket/Francis Street	Signals	25478	1860	1356
7-33	High Street/Bridge Street	Signals	45313	3036	2876
7-34	Winetavern Street/Christchurch	Signals	58503	3673	3237
7-35	James Street/Unnamed Road	Priority	19249	1214	986
7-36	Grattan Cres/Inchicore Terrace S	Priority	19318	1346	1428
7-37	Winetavern Street/Cook Street	Priority	17485	1107	1187
7-38	Lower Bridge Street/Cook Street	Signals	37184	2508	1980
7-39	Bridgefoot Street/Oliver Bond Street	Priority	18006	1313	1091
7-40	South Circular Rd/ Old Kilmainham	Signals	21727	1563	1337
7-41	Dolphin Rd/ Grand Canal View	Signals	22198	1698	1516
7-42	Brookfield Rd/ Adelaide Terrace	Priority	9394	671	579
7-43	Brookfield Road/ South Circular Road	Signals	18886	1383	1105