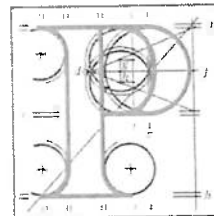


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Michael Bermingham
6, The Townhouses
Terenure Road East
Dublin 6
D06 F7V2

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

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

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

Kevin McGettigan

From: Eimear Reilly
Sent: Friday 5 April 2024 13:13
To: Kevin McGettigan
Subject: FW: Case Reference ABP-316272-23
Attachments: Submission to Bord Pleanala - Reference ABP-316272-23 27 March 2024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

-----Original Message-----

From: LAPS <laps@pleanala.ie>
Sent: Thursday, March 28, 2024 9:47 AM
To: Eimear Reilly <e.reilly@pleanala.ie>
Subject: FW: Case Reference ABP-316272-23

-----Original Message-----

From: Michael Bermingham <[REDACTED]>
Sent: Wednesday, March 27, 2024 8:41 PM
To: LAPS <laps@pleanala.ie>
Subject: Case Reference ABP-316272-23

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.

Dear Sir/Madam,

Please see attached correspondence outlining my objection to CPO and road widening in respect of your case reference ABP-316272-23

Regards,
Michael Bermingham

Submission to An Bord Pleanála regarding the proposed Templeogue/Rathfarnham to Dublin City Centre – Rathgar and Terenure

6, The Townhouses,
Terenure Road East,
Dublin 6,
D06 F7V2.
27th March 2024

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Case Number: ABP-316272-23

To whom it concerns,

We reside at 6, The Townhouses, Terenure Road East, Dublin 6, D06 F7V2. This property, our home, is a property affected by a compulsory purchase order under the proposed Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme 2023.

We wish to object to the Planning Application that has been submitted by The National Transport Authority under Section 51 of the Roads Act 1993 (as amended) in relation to the Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme 2023 to An Bord Pleanála. I also wish to object to the associated Compulsory Purchase Order 2023 on our property and home (Plot List: 1048(1).1,1048(2).2d).

As part of the ongoing consultative process, we submitted comments on bus corridor 12 and on the bus connects project in general on the 14th April 2020. While we remain in favour of improved public transport for all communities and better traffic management enabling all in the city centre area and wider Dublin area commuter belt to travel with ease, in addition to safer cycling and pedestrian routes, we remain opposed to the problems it creates for those living along and surrounding the bus corridor and gravely concerned about the negative impact to the landscape, local community and urban village heritage.

To date, members of this household have attended meetings in 2019 and early in 2020 organised by Bus Connects (Hilton Hotel, Charlemont) and numerous local resident and community meetings. We also participated in the virtual so-called public consultation meetings arranged in respect of corridor 10 and corridor 12 held this November.

Observations and comments that merit consideration and contribute to our opposition to the planned bus corridors 10 and 12, most specifically corridor 12 are submitted as follows:

General Observations:

1. The consultative process conducted at the height of the COVID 19 pandemic proved unfair to many in the local community given the restrictions that were in play at this time. These Level 5 restrictions rendered essential resident and community meetings not possible thereby preventing those who live in impacted areas the opportunity to discuss the shared impact of proposed changes. Many residents are less skilled and knowledgeable about internet technology or have limited access to devices enabling access to virtual zoom meetings. This resulted in many residents being excluded from the consultation process at a very critical time. It would appear that the NTA were trying to drive through this project, not so much under the cover of darkness but under the cover of COVID!
2. For those empowered to join the virtual meetings it was frustrating to find that where questions or observations were addressed or brought to the attention of the participants, the answers given were often very general and did not, in many instances specifically answer the actual question. There is little or no sense that residents, communities, and local business owners were being listened to. Well-grounded concerns and valid objections deserve greater consideration.
3. Proceeding with an application to An Bord Pleanála prior to the Transport Strategy review and a full audit of the effects of the Covid 19 pandemic on future transport requirements is "Putinesque" in its approach.
4. In such uncertain times, it would seem more sensible and democratic to delay this stage in the consultation process until full and active engagement of all in the community was safe and feasible.
5. It was very disappointing that local city and county councillors could not participate in the meeting held on the 4th November despite an early request for a change to the planned date.
6. There is no evidence that the NTA have engaged with those involved with conservation in Dublin City Council or South Dublin City Council. The negative impact of the NTA's proposals on historic urban villages such as Terenure, Rathgar, Templeogue and Rathmines will be dramatic and irreversible. This project looks to negatively impact on those living in this community by facilitating a right of way for those not living in this community.
7. The architectural heritage of Dublin, especially its historic suburban villages must be protected and preserved. In the recent past, parts of the historic city centre including

Georgian Dublin were destroyed to be followed by much regret when later reflected upon.

8. It seems nonsensical to proceed with this costly road widening that impacts on the frontage of numerous properties (Terenure Road East, Rathfarnham Road for example) when it is now evident that post covid working patterns (work from home legislation now in place) are unlikely to revert to pre-Covid patterns. Surveys on working habits and an oversupply of city office space leading to a fall in rental rates provide further evidence of these changes.
9. As the plans stand, it is hard to see (pick any lens) any benefit to only slightly reduced bus times, for example on the Rathfarnham Road when contrasted with the extremely high cost of CPO compensation and associated road construction. **Since making our original submission dated 16th June 2023, a priority bus signalling scheme has been successfully implemented on Terenure Road East and has proved to be very effective to date.** Such evidence of improved public transport timing should be considered a more environment friendly approach that negates the need for CPOs on my property and other properties on Terenure Road East.
10. No indication exists to date that the NTA's plan is properly and robustly costed. A Cost Benefit Analysis is required along with re-evaluation of the movement of population, altered working patterns and resulting traffic volumes to ensure the proposed plans are value for money for all taxpayers. As taxpayers, we would like to see made available the cost benefit analysis for this project along with the Environmental Impact Study.
11. All large cities have found that the only effective way of moving large volumes of people while reducing the need for private transport is by means of a city-wide underground metro. This has proven to be the preferred solution and I suspect will be the most cost effective in the long term, be more efficient and environment friendly and less damaging to the fabric, amenities and historical streetscape of Terenure, Rathgar and other local urban villages. Underground Metro systems have also proved to be the most effective way of getting city dwellers to leave the car at home and use public transport.
12. Removal of a significant amount of designated on-street parking spaces and also the loss of off-peak hours parking in bus lanes will impact negatively on local traders in Rathgar and Terenure. Smaller, local businesses and traders such a pharmacists, newsagents, butchers, bakeries, delis, florists, dry-cleaners, hairdressers, barber shops, cafes and restaurants etc serve local communities well and help generate social cohesion and community spirit.
13. Why has there been little or no investigation of other more practical and easier to implement solutions? Traffic density is not high at all times in any given 24 hour period for 365 days of the year, it exists rather at peak times in the morning and evening. The COVID pandemic adjustment to work from home is already observable with house price increases outside Dublin now growing at higher rates than that of Dublin City. In addition, all commuters know that journey times reduce when school/academic holidays occur. Thus, further consideration should now be given to the following:

- Introduction of a fully cashless bus system
- Better use of the entrance and exit on existing bus services to speed up journey times
- Increased number of buses at peak times in the morning and evening, especially Monday to Friday and in term time
- Local school bus transport schemes
- Incentives to walk/cycle to school/place of education
- Improved bus priority signalling
- Implement congestion charges as in other capital cities
- Increase fines for those driving illegally on bus lanes
- more park and ride locations for commuters from outer suburbs
- improved traffic light synchronisation implemented by independent traffic management consultants
- banning private cars (except for residents) in the city centre at prescribed times
- Making some routes one way rather than opting for extensive road widening

Specific Observations on the consultation process

1. Difficulty experienced by residents and neighbours, as not all were simultaneously in receipt of the revised plans. This is essential to ensure a fair, complete and equitable process.
2. The plan proposes felling mature trees, up to 3000 across the city and 19 on Terenure Road East between the villages of Terenure and Rathgar. All these trees enhance the local landscape of our roads and urban villages, improve the views we enjoy and the aspect of so many homes. These stunning trees are visible from Terenure Cross and Rathgar village and have been an important part of the vista and visual imprint of Terenure and Rathgar for over a hundred years. The trees in our home and in my neighbours' homes support biodiversity, green communities and general good health and wellbeing. Mature trees soften a city landscape and while new saplings should always be planted they do not compensate for environmental vandalism.
3. There remains to date, no clear evidence of how the proposed bus corridors 12 and 10 that will more rapidly funnel bus traffic into the restricted inner-city spaces is of benefit. Impact studies via computer aided traffic modelling remain essential. The impact of diverted traffic to secondary and small local roads remains a concern. Residents are justifiably concerned about the creation of rat-runs along with associated safety issues for more dependent family members and those attending local schools.
4. Erosion of our two local heritage villages to facilitate traffic flow and separation of neighbours by what is akin to a highway for buses threatens the welfare of those who live on Terenure Road East and the surrounding roads. Why must the work of

conservationists to date be swept aside? Now, more than ever the need for strong local communities is imperative.

5. The proposed street furniture and fittings are not in keeping with a Z2 conservative area, including the recent addition of harsh industrial street lighting
6. The loss of on-street parking, loading bays and local access will negatively impact local and long-established businesses with the potential to have a detrimental decline on our villages.
7. There is no guarantee that cyclists will use all the new cycle tracks. In attempting to divert cyclists to longer routes when the reality is they are likely to follow shorter more direct access routes, namely Terenure Road East, to the city centre. In general, more provision for cyclists is worthwhile but consideration must be given to the expected level of use, how the current plan is at odds with the NTA's own Greater Dublin Area Cycle Network Plan and the concerns of residents along the proposed 'Quietways' who were not consulted in advance.
8. Merging cycle paths and bus lanes together has resulted in ultimately unsafe cycle paths and the doubling up of 2 major transport systems running along the same routes – e.g. bus and cycle paths.
9. The road widening on Terenure Road East is unnecessary. The NTA should trial all road changes in advance to fully assess the impact on all roads of the Bus Connects proposals. Traffic modelling, as stated previously, is essential and there is a precedent i.e. Mountpleasant Avenue.
10. The land take proposal/road widening on Terenure Road East is unnecessary and potentially costly, especially so since the successful introduction of a new priority bus corridor is proving to be highly effective both in terms of purpose and cost.
11. The new right turn for buses, taxis and cyclists at Terenure Cross from Rathfarnham Road onto Terenure Road East should be reviewed. This will increase local traffic congestion and creates a highly busy route heading from Terenure to Rathgar. This is a residential road not the Stillorgan dual carriageway.
12. Reduced pedestrian space that is in conflict with DEMURS for urban streets. The failure to demonstrate that massively reducing the existing footpaths on both sides of Rathgar Road/Terenure Road East will not be unsafe and that these proposed 2 metre wide footpaths will have the capacity to accommodate the increased numbers of pedestrians due to the promotion of a modal shift to walking in national transport planning policy.
13. Flawed proposed bus stop relocations in Rathgar Village, Terenure Road East & Rathgar Road: safety, accessibility, interconnectivity issues arise as a result of these proposals
14. Flawed route selection process based on outdated data (2011 and 2016 census data). No Environmental Impact Assessment performed for the original route selection process
15. The proposed permanent infrastructure changes have a disproportionate cost in terms of environment, conservation of period structures and community disruption.
16. Poor air quality and noise pollution as a result of the volume of diesel hybrid and old diesel buses along the proposed route


17. Local access: Given legislation change is needed to permit the planned erection of traffic enforcement cameras, technology and legislation should be used to permit local access via number plate recognition.
18. The Bus Connects plan to provide a 24/7 bus service is excessive. This is not the solution to what was at most a 4-hour a day problem (split morning and evening) five days a week during school term in pre-Covid 19 times. 72 buses per day via Rathgar village will have a detrimental effect on the village. This should be reconsidered considering more recent changes in work from home habits.
19. The removal of the current Rathfarnham Quality Bus Corridor from Harold's Cross Road will have significantly negative impacts for bus transport, in the light of the scale of the proposed re-routing of buses, the critical importance of bus transport to the city, and its future role in facilitating modal shift from public car usage, in line with national policy.
20. The narrow junctions in both Rathgar and Terenure villages and the proposed 'new' 90 degree turn for buses at Terenure Village will cause massive issues for traffic flow.
21. An environmental impact study is essential in regard to the cycle route and planned new bridge within the Dodder Valley ecological zone. This is an area of exceptional biodiversity and it must be protected. A second bridge for a cycle route just 400metres from the Dodder Greenway at a 9 metre high level is a proposal that will have a huge negative impact on the environmental character of the Dodder Bank and Valley green space. It will require the felling of far too many mature trees and is not acceptable for environmental reasons nor for the enormous cost involved.
22. Two billion euro appears to be the minimum spend estimate (Is this going to be another "Childrens Hospital" estimate): Have any value for money or procurement audits on the project spend to date or on the budgeted cost of the latest proposals been carried out?
23. The information available on the Bus Connects website is not clearly and effectively communicated. More data on traffic modelling for new routes imposed on private car drivers for inbound and outbound journeys to and from the city centre is essential. This should be implemented prior to the NTA seeking planning permission. Details on NTA consultation with DRTCC should also be made available. Why does the NTA refuse traffic trials but relies instead on isolated and outdated computer modelling? Modelling of all sixteen core bus corridors together should be possible and available to review. Artificial separation of the 16 Corridors and proposed Orbital Routes-overall impact is critical. Dublin is one city. No holistic city-wide assessment of traffic or environmental impact has been forthcoming
24. Environmental Impact Assessment (EIA) has not been performed in conjunction with these plans: when will we get final EIA?

Our home remains affected by a proposed loss of land at the front and the felling of mature trees enjoyed by us, neighbours and those passing through the locality. How we live and enjoy our local villages of Terenure and Rathgar and navigate the locality will be adversely affected by the proposed road widening and changes in through traffic in all the ways outlined above.

The NTA plan does not enhance either the Rathgar or Terenure communities nor the public realm. We respectfully request that all points raised in support of our objection are considered and respectively acted on.

We kindly request confirmation, acknowledging your receipt of this submission. As our property is subject to a CPO under the Templeogue/Rathfarnham to City Centre Core Bus Corridor 12 Scheme 2023, it is my understanding that I am not obliged to pay the customary fee of €50.

Yours sincerely,

 27/3/2024

Michael Bermingham