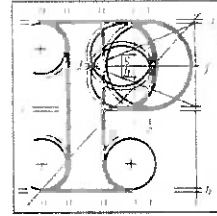


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Residents of The Cloisters and Maple Drive Area
c/o Mary Kenny
3 Maple Drive
Terenure
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

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 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
28 MAR 2024	
Fee: €	_____ Type: _____
Time: 2:00	By: <i>[Signature]</i>

3 Maple Drive,
Terenure,
Dublin 6w.

27th March 2024

An Borde Pleanála,
64 Marlborough Street,
Rotunda,
Dublin 1, D01 V902.

Date: 11/8/2023.

Proposal No: ABP/316272-23

“Templeogue/Rathfarnham to City Centre Core bus Corridor Scheme”

Dear Sir/Madam,

We make the following further observations as part of the next stage in the written process to consider the above proposal. Note that your letter (dated 23rd Feb) inviting a further response was not received until March 8th..... Attempts to access the NTA's on-line response to all submissions was not in fact available through the links communicated to us by phone and by that letter. It took a visit to Marlborough Street last week and an hour and a half of discussion with three young staff before we eventually received the almost 800 page NTA response late afternoon on 21st March. This is not an example of a process working well and an oral hearing would have served us all better.

We asked Bus Connect to address three main issues:

- 1. Whether the proposed corridor met community need or public interest, including in the context of environmental concerns for our immediate area.**
- 2. Traffic diversion, specifically the transfer of traffic flow from major to minor roads within the proposals.**
- 3. Whether extending cycle lane provision in our area requires it to be linked to this core bus corridor proposal.**

Item 1. We always accepted that environmental concerns demanded some shift from dependence on car usage to achieve a low carbon and climate resilient Dublin City, but believe that those concerns must be reconciled with many other concerns relevant to sustaining the structure of viable communities, and that does mean recognising that there is a level at which car use, and minimising pressure on traffic flow around that use will remain a vital part of the planning landscape for the foreseeable future. We should certainly not be worsening its impact through enforced lengthening of car journeys in many cases and further reducing air quality in some areas as a

consequence. These remain two substantial side effects of the proposed scheme that concern us. Throughout the substantial response Bus Connect often appears to concede negative impacts of the scheme (in terms of traffic flow, extra pollution, environmental impacts, difficulties for residents in some areas) but it becomes almost predictably attached to the observation that these factors are out balanced by more positive outcomes as adjudged by the NTA. They assert that such negatives will be short term and eventually diminished as people change their transport habits (fewer and presumably electric cars on city roads will reduce oil and noise pollution; traffic congestion will be reduced as people utilise bus, bicycle and pedestrian alternatives). There may be some legitimacy in the argument in relation to demolished trees, bat habitats, etc. Trees may well be replaced by more and better in 20 or 30yrs of growing time, but there is no established legitimacy in the argument presented in relation to car use in itself. By the NTA's own admission, elsewhere, (and not challenged by staff in the NTA when we visited them in November of 2023) there is no great evidence of high levels of transfer from car use to these alternative transport systems from examination of similar schemes/methodologies to this one across Europe. We may indeed see greater cross over between the use of bus/bike/foot amongst those non-car users, but there is very little real evidence of change amongst those who one may describe as 'change-resistant', either because they just won't even consider an alternative, or because of the nature of their personal and domestic circumstances.

Quicker bus journeys and extended cycle lanes are, of course, desirable outcomes for the city but we continue to maintain that the greatest incentive towards a major shift from the car would be through much improved frequency and a growing reliability of the existing service in terms of matching the timetable - and with the introduction of a free service or a substantially reduced fare structure. The public can take little comfort from the response document relating to details of city services going forward, given that these are matters not ultimately within the control of the scheme. But if we take at face value the 10% increase to the schedule across our area, and a suggested 6 min improvement in total journey time to the city centre we would argue that this reduction is achieved largely by removing nine bus stops off the most populated parts of the route. We concede the improved information now provided about the route 85 service, which will come down through Harolds Cross, but overall we still struggle to balance that limited 6 minute aspiration with the overall cost of the proposed scheme, particularly when taken with all the other negative impacts on wider traffic flow which will beset our area. We would assert that the existing framework of bus stops in fact supports wider public transport access by those most vulnerable members and groups within our community, and the six minute saving will be largely off-set by extra walking time to access it.

At the heart of the bus corridor proposal there is a major transfer of traffic from the Rathgar Rd to Harolds Cross Rd to facilitate bus traffic through Rathgar. NTA figures indicate a 25% increase in the traffic on a Harolds X Road that is already under pressure at certain times of the day/week/year. The NTA, in its public

documentation already identifies sections of Harolds Cross Road and adjacent areas as having issues of problematic air quality even without an increase of 25% in traffic flow. As residents of this area we find that unacceptable. It is no comfort to be told, as we are here, that once, if, when people reduce car use it will get better; when a more appropriate statement would be that it will get considerably worse before it possibly gets better.

Item 2. Blocked roads and limited right/left turns are a recurrent feature of the corridor plan. We now understand from the response document that it isn't that the NTA have missed a few issues, perhaps not sufficiently considered the impact on traffic flow, and the difficulty of access to certain areas presented by these proposals, and the congestion created at other sites, but, in fact, that they recognise the difficulties only too well, but give them very little regard in what they refer to as the 'balance of outcomes'. We still don't see anywhere evidence of combined modelling of traffic flows in and around the different corridors to honestly reflect the difficulties. The NTA does concede the difficulty presented to some residents from its banned right or left hand turns but we see no solutions presented, because difficulty to residents and car users is the main instrument for change being offer by this scheme. Likewise it offers no guidance or opinion to what extent the restrictions will be practically enforceable without a significant refocussing of garda time. Policing, like time-tabling, like fare structures is, of course, a concern for others.

There is no response to the issues we suggested were created by extra diverted traffic on roads e.g. Harold's Cross, Terenure Rd West, Fortfield Rd, Highfield Rd, in terms of traffic management beyond 'things will get better once...'. It is perhaps useful to remember that those recidivist sections of the community most affected and 'resistant' to aspects of the proposals are not easily characterised as your traditional car junkies. They are those with limited mobility, older residents for whom their car is their life blood, young families moving large numbers of children to schools and sporting/leisure activities, and indeed in many cases just families requiring relative ease of access to shopping areas. These are all categories widely represented along the route of this traffic corridor, and to which the 800 pages offer little comfort.

We have unresolved concerns about wider traffic flow directly around Harolds Cross Road, given the recent increase in population along that route and since this proposal was originally discussed with the NTA in 2017 and 2018. The route is now littered with new apartment blocks and has two recently established schools. We would add our support to the concerns expressed by Harolds Cross National School and its parents group, that there will be increased congestion on Stanaway Road, Clareville Road and Harolds Cross Road as a result of the proposal, and more traffic via Mt Tallant Avenue to Larkfield Grove and Gardens and vice versa. Congestion around that school is already a serious issue and we see nothing new in the plan to reduce that. Restricted private car users will be encouraged by restricted turns, etc., to use our area as a rat run to drive from the Terenure area to the Sundrive/ Kimmage area on what are narrow residential roads.

Many residents retain legitimate fears that extended commutes for work and family obligations (involving increased car emissions) will be an inevitable outcome from these proposals.

We restate our belief that in many areas HGVs will now be diverted onto residential roads and see/hear of no plan from any source to undertake the required work on these roads and pavements to allow them to support that use.

In many cases where Bus Stops are being moved or combined there has been no extra commitment to provision of bus shelters indicated, and we accept that, as a resident's group, this issue will be part of on-going engagement and lobbying into the future.

We maintain that the provision of Bus Gates for Templeogue Road, Kimmage Road Lower and Kenilworth is introduced within the plan without convincing evidence of need and these will seriously extend journeys and travel time for car users. Residents travelling from our area toward Poddle Park area will be restricted in both directions as far as we can see, having to travel via Sundrive onto Stanaway Road and Captain's Road to get there.

Many other examples of similar issues created by these proposals have been identified by groups and we cannot see that these have been widely addressed so much as out-weighed on the NTA balance.

Residents from other areas have addressed the issues created by having to travel along the canal route to get to the Church and adjacent parts of Rathmines. Local knowledge in almost every case would seem to share the view that accessing local amenities, shopping areas, parks and other affected leisure centres will become increasingly problematic, and once again we draw attention particularly to difficulties entering the Hospice at Harolds Cross from every direction. It will in future involve convoluted route management to access.

Items 3. We have a significant stretch of cycle lane in our area and are not only totally supportive of that but would welcome any safe extension of that provision. Equally though we recognise that cyclists represent only 7% of road users and transport provision has to reflect the widest spectrum of interests as they actually are. Moreover, extending provision for cyclists should not be dependent on acceptance of this particular plan. We do need greater and safer provision in segregated road space where possible, and better systems for policing that provision; but our desire to extend safe cycle lane provision is not in conflict with our response to these particular proposals, which, by and large, we believe will in fact push more and heavier traffic onto more minor road systems, extending polluting travel times and posing a wider threat to public safety, including, in this real context, to the cyclists accessing it.

Conclusion: As residents we would seriously support any genuinely inclusive transport plan for this area. There is an appetite for positive change that we have

engaged with in extensive conversation with local residents throughout this process, but we are being offered a hugely expensive package of proposals that polarise road user groups in a way that we do not believe is helpful or indeed necessary. If it proceeds as it is many of the changes to traffic flow will remain widely unenforceable and battlegrounds for activist groups such as ourselves for decades to come.

We hold that 'good planning' will and can succeed in this area in reframing transport attitudes where policy is seen to have considered the interests of all sectors of road user and not, as in this case, of simply reordering the priority list in an unsubstantiated belief that bold acts in themselves will somehow achieve where persuasion has failed. It is our observation that much as been achieved in terms of establishing some consensus around the goals for city transport policy and these proposals will damage a lot of that goodwill.

Thankyou for your attention,

The following is a list of Co-signatories from the Cloisters and Maple Drive area to the accompanying An Bord Pleannala submission NTA Bus Connect proposals: ABP/316272-23.

Templeogue/Rathfarnham to City Centre core Bus Corridor Scheme.

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STEWART DOWD	Stewart Dowd	15 The Cloisters, Terenure
MARIAN NUGENT	Marian Nugent	
NIAMH M ^C CARTHY	Niamh M ^C Carthy	25 THE CLOISTERS.
Catherine Geaney	CATHERINE GEANEY	26 " "
NANCY BYRNE	NANCY BYRNE	26 " "
Kate Sheehan	Kate Sheehan	65 The Cloisters
NOREEN. WOODS	Noreen Woods	21 The Cloisters
MARY MCKENNA	MARY MCKENNA	28 THE CLOISTERS
MARGO YOUNG	MARGO YOUNG	88 The Cloisters
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DEE DONOHUE	Dee Donohue	31 The Cloisters
MORTON LYNDIA	Lynda Morton	36 The Cloisters
VAN GLEESON	Van Gleeson	34 The Cloisters.
Brendan McKenna	BRENDAN MCKENNA	90 THE CLOISTERS
Claire Flanagan	Claire Flanagan	64 The Cloisters
JAMES MCKILIP	James McKilip	6 The Cloisters
NIKOLA HUMAN	Nikola Human	91 THE CLOISTERS.
KAROLINA HICKET	Karolina Hicket	2 MAPLE DRIVE, D6W
Sinead Grennan	Sinead Grennan	93 The Cloisters

