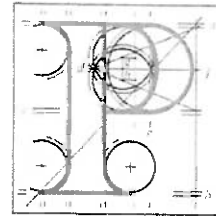


**Our Case Number:** ABP-316272-23



An  
Bord  
Pleanála

WORK Residents Association  
c/o 26 Osprey Avenue  
Templeogue  
Dublin 6W

**Date:** 26 March 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.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter 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

HA02A

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WELLINGTON, WILLINGTON, WILDERWOOD, OSPREY, RUSHBROOK & KENNINGTON

workresidentsassociation@gmail.com

The Secretary,  
An Bord Pleanála,  
Strategic Infrastructure Division,  
64 Marlborough St.  
D01V902

**AN BORD PLEANÁLA**  
LDG- \_\_\_\_\_  
AEP- 316272-23  
**20 MAR 2024**  
Fee: € \_\_\_\_\_ Type: \_\_\_\_\_  
Time: 10:37 By: Post  
Case Reference: **ABP-316272-23**

c/o 25 Rushbrook Road,  
Templeogue,  
Dublin 6W

### Templeogue / Rathfarnham to City Centre Core Bus Corridor

WORK Residents' Association represents in excess of 850 households in the Willington, Wilderwood, Osprey, Rushbrook and Kennington area of south-west Dublin and welcomes the opportunity to make a submission to An Bord Pleanála regarding the Templeogue / Rathfarnham to City Centre Core Bus Corridor scheme.

The area represented by WORK Residents' Association is bounded on the east side by Wellington Lane, on the south side by the Spawell Complex and the R.137, on the north side by the River Poddle and on the west side by the M50 and Tymon Park.

A swathe of South West Dublin, i.e. between the Green Luas Line and the Red Luas Line with a population of over 350,000, has a large deficit of public transport. WORK Residents Association does not believe that the planned supply of public transport to 2042 by *Bus Connects* will meet the forecast demand from a growing population in this area. The traffic gridlock, morning and afternoon, on Wellington Lane, in Templeogue, Terenure, Rathmines, Kimmage, Harold's Cross, Donore, Crumlin and on many narrow streets of the south city continues with increased carbon emissions. WORK Residents' Association would welcome any measures from NTA which are designed to:

- Support the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets;
- Enable compact growth, regeneration opportunities and more effective use of land in Dublin, for present and future generations, through the provision of safe and efficient sustainable transport networks;
- Improve accessibility to jobs, education and other social and economic opportunities through the provision of improved sustainable connectivity and integration with other public transport services.

WORK Residents' Association has given serious consideration to the proposed Core Bus Corridor and the contribution it can make to meeting the travel needs of the commuters of this area and attaining the above targets.

### WORK Residents Association has major reservations about the proposed Templeogue / Rathfarnham Core Bus Corridor

1. We are concerned that NTA sees BusConnects as the ONLY means by which the travel needs of commuters from South West Dublin can be met and seriously concerned at the dismissal by NTA of the contribution which a rail-based public transport system could make. In Chapter Three "Consideration of Reasonable Alternatives" NTA states "As Dublin is a low-density city with a large geographic footprint, there are few areas with the size and concentration of population necessary to support rail based public transport, and the bus system remains essential to serve the needs of much of the region". This is to deny the success of the LUAS and DART lines in transporting an increasing number of passengers from areas of population equally as dispersed as Rathfarnham, Templeogue, Knocklyon, Firhouse, e.g. Balally, Dundrum, Sandyford, Brides Glen. While the bus

system transported 159 million passengers in 2019, LUAS carried 48 million passengers and DART 36 million passengers. WORK Residents' Association rejects the assertion by NTA that a bus-only solution will meet the needs of Dublin South West in 2040 or beyond. "A Platform for Change" published by the Dublin Transportation Authority on 1<sup>st</sup> January, 2002, which detailed its research and transport modelling, indicated that a "bus-only" solution would not work in south-west Dublin and that a Metro would be required.

2. NTA claims in its documentation (Chapter 10, Population Table 10.5 Central Statistics Office 2016) that there are approximately 61,000 daily commuters in the area of the proposed CBC. Of the 61,000 commuters, approximately 9,750 travel to work by bus or mini-bus (16%). 27,500 travel by car / van (45%). While the table doesn't provide the actual numbers of commuters, 75% of commuters in Knocklyon travel by car and only 11% travel by bus. A similar percentage is true of the Firhouse area. Only 12% of the commuters in the Willington area travel by bus and 71% travel by car or van. In Chapter 3 "Consideration of Reasonable alternatives" NTA acknowledges that "In the case of Dublin, the existing public transport system does not currently have sufficient capacity to cater for large volumes of additional users". The mismatch between demand on the one hand and supply on the other hand is not addressed in the application.

**Table 2.1 Peak hour (am) in-bound buses in South West Dublin**

Bus corridor	Current	Current	BusConnects	BusConnects
	No. of Buses	Passenger capacity	No. of Buses	Passenger Capacity
<b>Kimmage – City Centre</b> (at Mount Argus)	<b>9</b> (3X54A; 6X9 )	<b>720</b>	<b>18</b> ( 6XF1; 6XF2; 6XF3	<b>1,440</b>
<b>Templeogue – Terenure</b> (at Terenure College)	<b>19</b> 12X15; 4X49; 2X65; 1X65B	<b>1,520</b>	<b>10</b> (5 X A1; 5X A)3	<b>800</b>
<b>Rathfarnham – City Centre</b> (at junction with Rathdown Park)	<b>12</b> (6X15B; 6X16)	<b>960</b>	<b>18</b> (5X A2; 5X A4; 2 X74; 6X85)	<b>1,440</b>
<b>Greenhills – City Centre</b> (at Crumlin Hospital)	<b>23</b> 6X27;1X56A; 5X77A; 1X77x; 6X123; 4X151	<b>1,840</b>	<b>24</b> (4XD1; 4XD2; 4XD3; 2XD4; 2ZD5; 2X72; 6X73)	<b>1,920</b>
<b>TOTAL</b>	<b>63</b>	<b>5,040</b>	<b>70</b>	<b>5,600</b>

Table 2.1 BusConnects October 2020 shows current bus provision in the peak hour inbound for all of the corridors in South West Dublin. There is provision of an extra 7 buses. This minimal increase in capacity projected for the Core Bus Corridors in Dublin South West will not incentivise sufficient numbers of car or van drivers from Knocklyon, Firhouse or Willington to switch their mode of travel to work nor does it justify the huge investment involved in procuring this CBC. Nor will the minimal reduction in the time of the average bus journey to the City Centre as projected by NTA make the public bus service a more attractive option for these private car/van users. One of the primary aims of the Greater Dublin Area Transport Strategy was to significantly reduce demand for travel by private vehicles.

Subsequent to the design of BusConnects, the NTA carried out an analysis of demand in preparation for their *Strategy for the Greater Dublin Area 2022 -2042*. In the *Modelling Report* the level of demand in the peak hour, in-bound was estimated for 2042 as 9,300 passengers. The actual supply in 2022 of bus places, peak hour, in-bound on Rathmines Road is 2,640.

3. WORK Residents' Association notes the claim for growth forecasts in bus use attributable to the Core Bus Corridor, made by NTA in its application to An Bord Pleanála and repeated in its response to submissions made by many residents and residents' groups. The projected growth forecast for the number of people travelling by bus in the CBC is up 123% in the AM Peak Hour and 145% in the PM Peak Hour in the opening year 2028 – this is truly remarkable and attributable solely to the time savings/service punctuality improvements attributed to the CBC infrastructure works. But what is the basis for this claim? This level of growth is unprecedented and

cannot be evidenced by any such similar growth elsewhere on these islands. WORK Residents' Association questions the reliability of this claim and believes that An Bord Pleanála should demand a more robust evidence-based answer from NTA regarding potential bus use on this corridor.

4. The imposition of a bus gate (6am to 8pm seven days a week) at Olney Crescent on the approach to Terenure Place together with the Bus Priority signalling in Templeogue village are designed to make it difficult or impossible for the General Traffic to reach Terenure village by the R137; at morning peak time these measures will lead to tailbacks back to Spawell. Car/van drivers will be diverted left or right off this corridor on to neighbouring roads or streets and having taken the diversion will then have to cope with bans on right turns on to other roads, e.g. Greenlea Road and Lavarna Grove "in order to prevent through traffic diverting **inappropriately**". Local traffic (from College Park, St. Pius X Church, Wainsfort Grove etc.) emerging from College Drive onto Fortfield Road will be unable to turn right on to Greenlea Road to access local Post Office, Dentist, shops or to access home if they live on Greenlea Road, Parkmore Drive. How inappropriate is it to prevent residents of Greenlea, Parkmore and Lavarna from turning right on their return drive from morning Mass in St. Pius X Church or a parent who has driven her/his young children to St. Pius X NS and wishes to return to their home or workplace in Greenlea, Parkmore or Lavarna? In order to access their home and to comply with the Bus Corridor scheme these drivers will have to continue on Fortfield Road to the KCR, turn right (if that will be permitted) on to a congested Terenure Road West and turn right (if permitted) off Terenure Road West onto R.818 Lavarna, Parkmore Drive or Greenlea Road.
5. There are three Core Bus Corridors that are intended to address the travel needs of commuters from S.W. Dublin:
  - a. Tallaght/Greenhills to City Centre,
  - b. Templeogue/Rathfarnham to City Centre and
  - c. KCR (Kimmage) to City Centre.

Planning Approval is being sought separately for all three corridors, in isolation from the other, though the impact of any one of these on the other has not been factored into the application to An Bord Pleanála. The General Traffic displacement brought about by the Templeogue/Rathfarnham to City Centre CBC will be exacerbated by the displacement brought about by the KCR to City Centre CBC. While it is clear that this is "a deliberate mechanism on the part of NTA to significantly reduce demand for travel by private vehicles", WORK Residents' Association notes that one of the four objectives which the NTA has specified is "to support sustainable economic activity and growth by improving the opportunity for people to travel for work or business **where and when they need to** and facilitating the efficient movement of goods". This objective rings hollow for the many tradespeople, van drivers, commercial vehicles, small business operators who will meet obstacles to get to their place of work or to their customers and the many residents whose travel needs cannot be met by a public bus service.

#### 6. **Traffic Redistribution:**

The Environmental Impact Assessment Report (EIAR) Main Report, Volume 2, Chapter 3 Page 8 acknowledges that the installation of bus gates on the approach to Terenure and on Kimmage Rd will likely lead to redistribution of trips at certain locations along the corridor onto the surrounding road network. Diagram 6.40 and 6.41 are quite misleading – the thickness of the blue line after the Fortfield Road junction with the R.137 (Templeogue Rd) would indicate that there will be no reduction in general traffic on that stretch of road.

Residents in the WORK area are not just perplexed but angry at the contents of Table 6.60 (Chapter 6) which sets down "**Direct Reductions in General Traffic at Peak Hour Morning**".

NTA projects that on Wellington Lane there will be a reduction of 291, from 2,141 to 1,851, in the number of vehicles using this road at Morning Peak Hour, a reduction from 1,108 to 926 (182) on Cypress Grove Road and a reduction from 1,036 to 689 (348) on Templeville Road. WORK Residents' Association does not accept this projection of the General traffic reduction in this area. In fact, WORK Residents' Association expects that **Wellington Lane will see an enormous increase in general traffic** – traffic from Knocklyon, Firhouse and

Tallaght – that will be displaced by the CBC measures from Spawell to Terenure and will add to the gridlock on Wellington Lane, Whitehall Road, Whitehall Road West, KCR, Stannaway Road, Sundrive, Terenure Road West and other areas. There is a significant risk that a substantial volume of traffic coming off the M50 will divert at the first opportunity inside the M50, i.e. Wellington Lane; if not Wellington Lane then Cypress Grove Rd., Templeville Rd., Fortfield Road. This substantial increase in the volume of traffic will occur not just at morning Peak Time but continue throughout the working day.

7. **Access to recreational facilities.**

Community accessibility relates to the ability of users to access community facilities, recreational resources and residential properties. NTA acknowledges that “changes in traffic flow and parking provision can impact the ability of users to access certain community facilities”. The proposed CBC will see a 24 hour, 7 days a week ban on right-turn off the R.137 on to Rathdown Park and Rathdown Avenue (opposite entrance to Terenure College) making Bushy Park much less accessible for the many citizens who enjoy the many facilities it offers to people of all ages – football pitches, tennis courts, skate-board park, bowling, Saturday morning markets, picnic areas and lakeside walks. WORK Residents’ Association rejects the assertion by NTA that “due to the small number of community facilities in each community area, the overall impact on these community areas is expected to be Negative, Not Significant and Short-Term.” WORK Residents’ Association believes that had this measure been flagged at public consultation meetings, it would have been rejected by local communities. WORK Residents Association believes that the impact will be Negative, Very Significant and Long-Term. WORK Residents’ Association proposes that this element of the NTA application be rejected by An Bord Pleanála.

It makes nonsense of one of the four objectives which the NTA has specified – **“connected communities and better quality of life”**.

8. **Bus Gates:**

There are two bus gates in the proposed Core Bus Corridor scheme, one on Templeogue Road (Olney Crescent) and one on Rathmines Road Lower. WORK Residents Association expects that another bus gate will be a feature of the KCR to City Centre CBC on Kimmage Road Lower. All of these bus gates are planned to operate daily between 06.00 and 20.00. This restriction, 14 hours a day, 7 days a week, on the movement of general traffic is uncalled for and WORK Residents’ Association is asking that they be reserved for morning rush hours, Monday to Friday, 07.00 to 10.00 only, and that measures be implemented to regulate through traffic outside these hours. *“Constraining commuters from making journeys by car and requiring them to use other modes, without these modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system”* EIA Main Report Vol 2

9. The NTA application proposes changes to the roundabout at the junction of Wellington Lane and the R 137 – the Spawell Junction. It is proposed to make it a signalled junction with priority for bus traffic on the R.137. On the BusConnects network this junction is the starting point of the F2 Spine. The documentation supporting the NTA Application provides no information on where the turning point will be for buses on the F2 Spine after the removal of the roundabout; more Information is required on this aspect of the CBC project. The solution which NTA puts forward for the implications of this new junction layout is that buses will travel to the roundabout on the M50 and turn around heading back in towards Templeogue on the R.137 that will have a long queue of traffic waiting to divert off the R.137 on to Wellington Lane.

10. Planning permission is being sought by the NTA for the Templeogue / Rathfarnham CBC in isolation from all other CBCs and the supporting documentation provides very limited information on what becomes of the corridor when it reaches the junction of South Great George’s Street and Dame Street. *“The Proposed Scheme ties into the existing road network on Dame Street”* is the only information that WORK Residents’ Association could find in the documentation. From that terminal point of the proposed CBC do buses turn left onto Dame Street and cross the River Liffey by Capel Street Bridge or will provision be made in the plans by Dublin City Council for the pedestrianisation of College Green / Dame Street to allow for a right turn by buses at the terminal point of the proposed corridor? How does the “A” corridor on the south side of the city connect with the corresponding “A” corridor from Swords to Parnell Square in the north side? The NTA response to the

observations submitted to An Bord Pleanála in respect of this lacuna in the documentation offers no clarity to the public. WORK Residents' Association asks that An Bord Pleanála and the public be provided with this information before a decision can be made on the application and on the other CBCs.

11. WORK Residents' Association is seriously concerned at the lack of data and research from NTA on the serious negative effects which the Proposed Scheme will have on the business community in Terenure Village and on the many tradespeople and workers who rely, of necessity, on their private car/van for the conducting of their business. In its supporting documentation the NTA states that it examined 12 options, S2-01 to S2-12 when it was considering the section of the CBC between Fortfield Road junction and Terenure Road West junction and the impact of the measures on accessibility to Terenure.

NTA declares that *"With regard to Land Use Character, it was considered that Option S2-4 had significant advantages over route options due to the greater impacts that other options have on the accessibility to the businesses in Terenure village"*. Yet, despite the significant advantages which Option S2-4 holds over all of the other routes, S2 -12 was selected by the NTA.

12. **Bus Congestion**

In the documentation supporting its application to An Bord Pleanála, NTA estimates that in 2043 (based on the *Modelling Report for the Greater Dublin Area Transport Strategy 2022 – 2042*) there will be 4,250 passengers on Terenure Road East in the peak hour (am) – about 55 buses. This number of buses, one per minute and travelling, one behind another and unable to overtake while the leading bus is stopped to pick up its passengers together with general traffic and cyclists, is a recipe for bus congestion and cannot be an attractive or a sustainable option for commuters from the Dublin south-west area.

13. WORK Residents' Association welcomes the provision of cycle tracks and cycle lanes on stretches of this corridor and on quieter streets. We particularly welcome the east-west cycle facility on Bushy Park Road, Wasdale Park, Wasdale Grove and Zion Road and the cycle facility within Bushy Park and on Rathdown Drive.
14. WORK Residents' Association also welcomes the measure in the Proposed Scheme to reposition the footpath to the inside of the Arch beside Templeogue House and to position the cycle lane outside the Arch beside the carriageway. We also welcome the measures to strip the ivy off the Arch and secure the stonework, to install decorative lighting, stone paving, ornamental planting and areas of seating.

**In light of the serious issues raised in this and in many other submissions, WORK Residents' Association believes that An Bord Pleanála should not grant approval for Planning Permission for the Templeogue / Rathfarnham Core Bus Corridor Scheme.**

Ian Heffernan,

Chairperson

WORK Residents' Association

18<sup>th</sup> March, 2024.