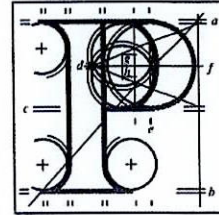


Our Case Number: ABP-316272-23



An
Bord
Pleanála

Christian Schaffalitzky
14 Vernon Grove
Rathgar
Dublin 6

Date: 05 July 2023

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 accept this letter as a receipt for the fee of €50 that you have paid.

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. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. 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.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

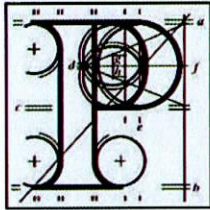
Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

Tel	Tel	(01) 858 8100
Glaó 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



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Christian Schaffalitzky FIMMM CEng

(b) Observer's postal address

14 Vernon Grove, Rathgar, Dublin 6

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not Applicable

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

316272

- (b) **Name or description of proposed development**

Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Templeogue / Rathfarnham to City Centre Dublin

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

As a resident of Rathgar, I am making this submission. I am also experienced in assessing EIA's and indeed preparing them. I am focused on the change in traffic volumes on my road and adjacent routes. I refer to it, as they do, as the **Proposed Scheme**. This observation is limited as I have a job and cannot spend large amounts of time exploring it further.

I have reviewed the EIAR submitted in this application. I have one general observation before commenting in detail.

In the data provided, a classification is used for the work proposed: “**do nothing**”; “**do minimum**”; “**do something**”. “**do minimum**” is the base case used, which states: “...(*Opening Year 2028, Design Year 2043*) represents the likely traffic and transport conditions of the direct and indirect study areas including for any transportation schemes which have taken place, been approved or are planned for implementation, without the Proposed Scheme in place.”

The flaw in this approach is that it is impossible to assess the changes expected when they do not provide the current volumes of traffic. It assumes that earlier plans already implemented have their measured affects in 2028 as a baseline, NOT TODAY. How do we know what traffic is generated between today and 2028, the start date?

5. Grounds

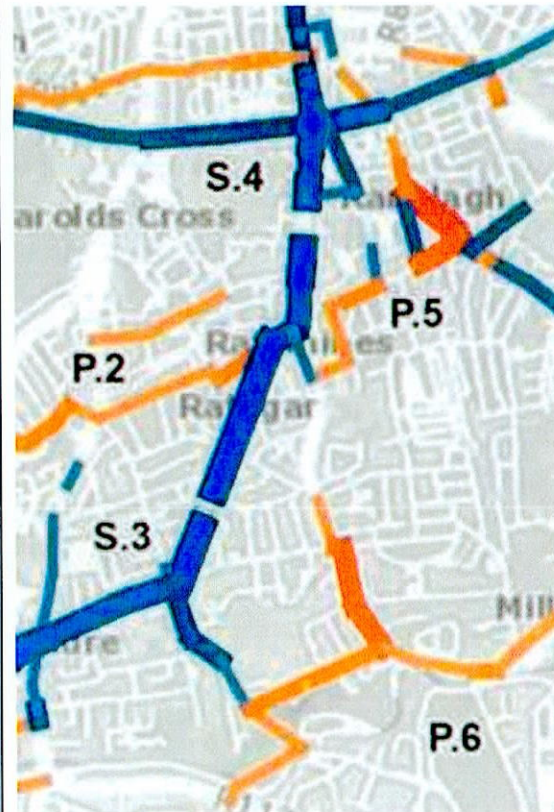
On enquiry, it has been confirmed that much of the traffic data has been modelled. Certainly traffic today seems to have been significantly underestimated with respect to the roads I discuss below.

My detailed comments flow from this poor baseline data. I have assumed herein that the numbers provided under “do something’ are similar or slightly greater than the reality today.

The report refers to the “Indirect Study Area” (Diagram 6.2) wherein all my comments refer. It is my view that the Proposed Scheme is a plan for the CBC as part of the GDA transport strategy but takes inadequate account of the effects in the Indirect Study Area. In fact, it is transferring traffic from the CBC to all the adjoining roads and districts. By default, it is creating ‘rat runs’ for ourselves as we drive around trying to get from A to B.

Table 6.6.3 illustrates the future environment planned for our area. Highfield Road is shown as having reduced traffic – this makes no sense as if you want to go to Rathgar from Rathmines with the new one way system, it is the obvious route now that they have planned a new right turn from Rathmines Road Upper. As a result, Templemore Road, Neville Road and Vernon Grove are at risk to higher levels of ‘shortcut’ traffic, in my view.

5. Grounds



Extract from Diagram 6.41

Upper Rathmines Road (URR) is shown correctly as very heavy from the Highfield Road junction down Dartry Road but how come no traffic is shown on its approach from Rathmines? The logjam on URR to the Highfield junction will start at Cowper Road or perhaps even further north – some days it does already.

Frankfort Avenue - some mornings the queue of cars can be back to the Maxwell Road junction.

5. Grounds

From this micro-study of the this detailed report, it is very disappointing to learn that the data is so poor. The detailed assessment and large budget allocated to this CBC has sacrificed the neighbours to traffic hell.

I cannot understand the logic of this EIAR. They assume falling volumes of traffic without a significant increase in public transport – the increases proposed here are woefully inadequate. I have no problem with improving safety for cyclists and pedestrians and this could be prioritised together with providing alternative public transport. Cars will reduce in that case naturally – the cure described in this EIAR is worse than the problem.

Finally, I must complain about the very poor effort to inform us of these plans. No-one in the Indirect Study Area has been consulted on this plan – yet the negative consequences are entirely ours – clearly set out in the EIAR. This is a direct breach of the Aarhus Convention but I will not accuse them of deliberately ignoring us. Rather, I prefer to assume that professional arrogance rules the day!

5. Grounds

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to **request the Board to hold an oral hearing**, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes