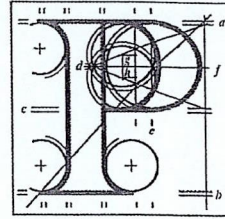


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Bernadette Quigley & Alessandro D'Erme
19 Victoria Road
Dublin 6
D06XD58

Date: 22 August 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 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

HA02A

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 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

Bus Connects Submission to An Bord Pleanála in respect of the Templeogue/Rathfarnham to City Centre Core Bus Corridor

Bord Pleanála Case Reference: APB.316272

By Bernadette Quigley and Alessandro D’Erme of 19 Victoria Road, Dublin 6, D06XD58.

We are a family living on Victoria Road with two children attending primary school in Terenure. Having reviewed the planning application, we find it impossible to see how the many detrimental impacts of the proposed plan are outweighed by any improvements which can realistically be expected. We are also concerned by the lack of modeling, insufficient consultation and apparent disregard for environmental, social, financial and safety concerns which argue against the plan as currently proposed.

The objectives of this planning application as stated by the National Transport Authority are “*to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region*”.

However any detailed consideration of the plan clearly reveals that the cost and reduction in quality of life and environmental impact far outweighs any theorised improvements.

First, a considerable amount of tree removal will take place which is not just a key quality of life issue for many living in the area, it also substantially impacts on natural habitats of birds and wildlife in the area.

Second, and of great concern, is the fact that the entire plan appears to presuppose that all existing car traffic will miraculously cease with all car users transferring to bus users (which even were it to happen there is no bus capacity to accommodate) or to bicycle traffic. In reality however, a substantial amount of car traffic will simply be diverted to smaller residential roads. Quite apart from the fact that such roads were never designed to accommodate such traffic and accidents will be unavoidable, the absence of quieter residential roads on which children can safely walk and cycle will simply force parents to transport them in cars. The objectives of the plan are, in this way, entirely defeated.

Third, no proper account or modeling appears to have been done to alleviate the likely effect of the introduction of substantial traffic volumes on residential roads. For example, while NTA accept that the roads surrounding the main corridor will have increased volumes of traffic (albeit it is contended that their own figures are flawed) the fact that Rathgar Road will be a prohibited route outbound there is no consideration of the reality that up to 9,925 vehicles that use this route will have to find a different route, as will the up to 522 lorries.

Rathmines Road will be a prohibited route, up to 9,731 vehicles that use this route inbound and up to 9,916 vehicles that use this route outbound will have to find a different route as will the up to 73 inbound lorries.

It must be envisaged that, under the plan, every one of those vehicles will instead pass through a residential street. There will be an unavoidable impact on residents trying to access and exit their homes. It will lead to increases in stationary traffic due to sheer volumes, all affecting the environment and air pollution. The traffic will impact on the ability of children to walk and cycle to school. Our daughters walk to and from Presentation Primary School every morning and afternoon. They walk along Wasdale Grove, up Greenmount Road, along Terenure Road East, cross the road in Terenure village and continue along Terenure Road East. There is already too much traffic along narrow main roads to make cycling a viable option. Terenure Road East particularly is far too dangerous to permit a child on a bike. Currently one of the few routes my children can safely cycle is along Highfield Road to Palmerston Park. With the expected increase traffic along that road this is likely to no longer be an option.

Similarly, prohibiting a right turn from Greenmount Road onto Terenure Road East will push all local traffic down Victoria Road and into Rathgar village. Apart from the fact that Victoria Road is a one lane residential road with many small children living on it, this will also create traffic problems at the cross roads in Rathgar village thereby delaying travel times for those traveling through the village.

Fourth, the corridor plans also do not take account of any of the needs of adults with children or elderly people seeking to use the bus network plans as there is an assumption that people will be willing to change buses not just once or twice but up to three times in order to get to their desired location. The fact is that many will be unwilling and a substantial number will be unable forcing them to take cars and there will be an increase in car volumes on many of the now proposed more limited arteries to these destinations.

Moreover, as any bus user can tell you, each bus can accommodate either one wheelchair or pram. Accordingly, as a mother with a pram I was regularly passed by three buses in a row because there was no capacity to allow my pram on board. The plan in no way addresses capacity issues which effect those traveling with small children, the elderly or those with disabilities. It is a plan focused entirely on taking a couple of minutes off the journey time of those with good health and mobility without any consideration for the impact on the rest of society.

The environmental cost of air pollution must also be factored into this equation and there is guaranteed to be an increase in air pollution, thereby defeating the macro reasoning behind these schemes in the first place. The sustainability reasoning simply hasn't been provided.

Fifth, the segregated cycling tracks are not continuous along the CBC routes. In fact, there are sections of road where segregated cycling lanes cease altogether in order to prioritise bus lanes. This is a very significant flaw that prioritises the minutes shaved off bus journey times (a theorised objective that only impacts during peak traffic travel times, if at all) over the safety of cyclists who are obliged to road share without segregation for significant sections of the road on a 24/7 basis. The balance is completely wrong to prioritise bus routes where the demand fluctuates over cycling where the need is 24/7. There are attendant roads that will have no cycling infrastructure at all, for example, there will be no cycle lanes on Terenure Road East. Cyclists will use the bus lane as far as St Joseph's and then the general road. For this reason, it remains extremely dangerous for young children to cycle from our area to Presentation Primary School. This is just one example of the fatal flaws which underpin the plan.

Sixth, we attend the Church of the Three Patrons in Rathgar, regularly driving our children and elderly parents (aged 89 and 85) there for Sunday Mass. On the basis of the plans as published it is impossible to see how elderly parishioners will continue to attend.

Seventh, even if the plan would deliver a more efficient bus infrastructure along the corridor, the reality of which is disputable, it does so at a significant cost which cost is entirely disproportionate to the benefits promised. There is a huge need for sustainable public transport throughout Dublin and everyone agrees that an enormous level of change is needed to achieve it. However, this application should be about whether this is the right change or the best change to make in order to achieve that objective. It seems to us that there has been absolutely no engagement on this issue at all. Rather the NTA have sought submissions on individual bus corridor plans without regard to the overlapping nature of the plans and the combined effect on residents and all road users. Environmental Impact Assessments should be obliged to consider the accumulative effect of all of the bus corridors, not merely each one in a silo, that is neither accurate nor reasonable.

Moreover, reading the plan is extremely difficult and terms used therein are not clearly defined. Accordingly, it is impossible not to seriously question the appetite for genuine consultation as opposed to a formulaic box ticking exercising on the part of the NTA. What precisely is a "quiet street"?

Eighth, it is difficult to confidently predict the ability of the scheme to meet the stated objectives and result in any real change in either bus journey times or environmentally preferred outcomes.

A considerable number of bus stops are being removed. This alone would bring about shorter journey times as the bus isn't stopping as much as it would otherwise be. Moreover, the predicted improvements in journey times do not account for increased walking times to stops.

The traffic counts that form the basis of the published plans do not appear to have been updated since before the covid pandemic.

There is no explanation as to why bus gates are for much longer than would be required and apply seven days a week.

The boast of the NTA is increased capacity and reduced journey times. However, the reduced journey times are minimal. This is a screen shot from the Traffic and Transport Chapter 6 document, page 136:

Based on the results presented in Table 6.53, the Proposed Scheme will deliver average inbound journey time savings for A2 service bus passengers of circa 6 minutes in the AM in 2028 and 4 minutes in the AM in 2043.

This figure arises when you compare “do something” with “do nothing” projections – so ultimately we are talking about a reduction in travelling times of 4 minutes in the long run. As noted above, this 4 minutes does not account for increased walking time to bus stops or the impact on those who for mobility reasons have difficulty accessing bus services or indeed the impact on other road users such as children seeking to walk and cycle or the impact on residential streets. By 2043 we could have a very accessible Metro system in place that could cater for increased population and would be significantly more attractive to changed modalities.

When considered in this light it is difficult to ignore the reality that there are better ways to achieve the macro objective of changing modalities than this considerable expense for such a limited improvement accompanied by the creation of safety issues and travel difficulties for so many disregarded under the plan.