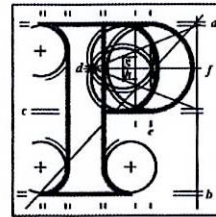


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Brian Walker, Carol Walker, Alison Walker  
34 Terenure Park  
Terenure  
Dublin 6W

**Date:** 15 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](mailto:laps@pleanala.ie)

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

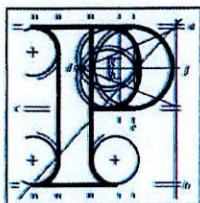
Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02A

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Riomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

Brian Walker, Carol Walker, Alison Walker

(b) Observer's  
postal address

34 Terenure Park, Terenure, Dublin 6w

### 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

Click or tap here to enter text.

(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)

Click or tap here to enter text.

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

Bus Connects Templeogue/Rathfarnham to city centre core bus corridors

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

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

Templeogue/Rathfarnham to city centre - Rathfarnham, Templeogue, Terenure, Harold's Cross, Rathgar, Rathmines, Kimmage, Ranelagh, Sundrive



## 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).

**Brian Walker, Carol Walker and Alison Walker**  
**34 Terenure Park,**  
**Terenure,**  
**Dublin 6w.**

The Secretary  
An Bord Pleánála,  
(Strategic Infrastructure Division),  
64 Marlborough Street,  
Dublin 1.

29th July 2023

To Whom It May Concern,

**Re: The National Transport Authority Bus Connects**  
**Templeogue/Rathfarnham to city centre core bus corridors**

Statement:

## 5. Grounds

We (Brian and Carol Walker) are the owners and occupants of 34 Terenure park, Terenure, Dublin 6w. Alison Walker is an occupant also at this address.

We are writing to you to lodge an **objection** to the National Transport Authority Bus-Connects Templeogue/Rathfarnham to city centre core bus corridors.

This Submission relates to The National Transport Authority Bus Connects Corridor from Templeogue/Rathfarnham to the City Centre.

**Observations:** We submit that Bord Pleanala should refuse the planning application by the National Transport Authority for Bus Connects Corridor from Templeogue/Rathfarnham to the City Centre.

We further believe that the decisions made now will affect the provision of infrastructure, for this area of Dublin for generations to come and, we respectfully request you to consider, carefully, the content, findings and analyses contained in this submission to support our case.

**Main Reasons** as follows include the following;

### 1. Breach of Aarhus Convention and Habitats Directive

- We believe that the lack of consultation on important changes is a breach of the above. Removal of trees along this route which are home to protected bat species is a breach of the Aarhus Convention and the Habitats Directive.



## 5. Grounds

- **Trees at Rathgar** will all be felled, and these have bat routes.
- At **Pearse Bridge in Rathfarnham, there are many species of bat** and this plan will seriously interfere with this protected species.
- The trees will be felled for road widening which is unnecessary. Trees will be **felled in Bushy Park**, which are home to bat species. This is a natural area and the mature trees and bats need to be protected under the law.

### 2. **The National Transport Authority (NTA) have not considered all the possible options**

- **Metro:** The NTA has not considered extending the planned Metro to this area. This may be more beneficial to the public than BusConnects. A proper feasibility study for continuing MetroLink to the area needs to be carried out. We believe that a metro extension to this area, perhaps to Rathmines, would yield immediate benefits environmentally for this area of South West Dublin, and avoid adverse environmental impact. Money should not be wasted on this plan and the metro should be extended to this area. In the alternative, the Luas line should be extended to the area. With only 7 extra buses on the road, the plan is not economically viable.
- **Inconsistent approach:** some areas are being treated preferentially e.g in some circumstances priority signalling and one-way systems are proposed to minimise impact whereas in other areas crude road widening is being proposed. This plan is an inadequate plan for the supply of Public Transport to the area.



## 5. Grounds

- This plan is ill thought out and unworkable. Alleged savings of seven to eight minutes commute time for an estimated €120 million can be **achieved in different and cheaper ways**. It will be a disaster for local communities, businesses and taxpayers. It will destroy local businesses, historical villages and local communities and will create chaos on every side road to town.
- **Traffic integrated modelling not carried out on general bus corridors** – it has been done in silos. The **process should be paused** until integrated modelling is carried out. An expert should be appointed to review this.
- Current plans will have **HGVs travelling down Fortfield and will be going through Terenure**. No plan has been developed to look into this and how it will be managed.
- **A bus stop will be placed at Our Lady's School** and this is a **flood area**.
- This whole plan is supposed to be about **climate action** but in fact **emissions will go up as journeys will be elongated** and there will be **sitting traffic everywhere**.

### 3. A 24/7 proposal is unnecessary

- The NTA has **not** carried out studies in **traffic post-Covid** and has not taken into consideration any reduction in traffic at certain days and times. The NTA should take into account that heavy traffic occurs during rush hour but there are also quiet times outside these hours. It is excessive — a

## 5. Grounds

twenty-four-seven plan for a four-hour problem. Beyond rush hour, these roads are empty and traffic flows freely. **Limited traffic impact studies have been performed and have not assessed the effects of rerouting.**

- **Bus gates should be confined to morning, afternoon and evening peaks.** An example of where this has been applied is at St James gate Hospital where it only applies during peak hours.
- **A new survey should be carried out to see if the demand really exists now.** Traffic surveys were carried out in 2019 and 2020 but none have been carried out post Covid crisis.
- Dublin Bus are also having **difficulty recruiting drivers.** This will not be improved with this plan.

### 4. The time-saving claims are unrealistic

- **No real time savings** on many routes e.g. the NTA estimates that the **7-8 minute improvements** in peak time travel (Feasibility Report (page 22)) (7 minute improvement of bus timings from City Centre to Rathfarnham and a 8 minute improvement the opposite direction ) along the Rathfarnham corridor will be achieved primarily by implementing priority signalling and cashless fares as there are already significant bus lanes along the route. The NTA states that Core Bus Corridor (CBC) is designed to improve bus timing and reliability. This is **not** a sufficient time saving for the cost and impact of this plan.
- We are challenging the National Transport Authority's Proposals for Corridors 10, 11 and 12, which will see the **destruction of communities**



## 5. Grounds

**and heritage to save 7 minutes bus travel time** from Rathfarnham to Dublin City Centre at an estimated cost of up to **€120 million**.

- Crumlin Road and Kimmage Road will only have 7 extra buses provided. On the number 15 bus coming from Knocklyn, there are currently 10 buses per hour and this will be reduced to 5 per hour which will mean that buses will reach full capacity quicker and people will not be able to get on a bus.
- The plan to develop a **six-lane highway** running through the villages of Rathfarnham, Templeogue, Terenure, Rathgar into Rathmines will destroy our communities.
- The key concern is the **scale of the proposal** which outlines the introduction of a 6 lane highway comprising **2 car lanes, 2 bus lanes, 2 cycle lanes and footpaths** along the proposed **Corridor 12**, running into pinch points at the urban villages of Terenure, Rathgar and Rathmines. CPOs of between 4 metres and 6 metres from 255 properties on Corridor 12 alone are proposed. The impact of the development will seriously cause **devastating damage to local communities and businesses, compromise safety, while destroying the environment and heritage of the area.**
- The estimated cost of the proposed Rathfarnham to City Centre Core Bus Corridor scheme infrastructure is anticipated to be in the region of **€40-48 million excluding VAT (page 21)**. However, this cost only relates to infrastructure and does not include CPOs and other expenses including reinstating house entrances and expensive property devaluation payments.

## 5. Grounds

It has been suggested that costs will be in the region of **€120 million for Corridor 12 alone**. Construction of the corridor will **take two years to complete** and will cause **huge disturbance and interference to the community**, including traffic congestion.

### Route 10

There will be **generation of increased traffic/rat-runs along Terenure Road West, Fortfield Road and Greenlea Road** as an implication of Route 10.

There will be a **loss of many trees in Templeogue village and reduced car parking in Templeogue Village** with resultant **business impacts**.

### Route 11

There will be **reduced access to Kimmage Road Lower and Sundrive Road** as an implication of Route 11. This will **impact on local retail and general commercial activity**. There will be an **impact on access to community, religious and educational facilities**.

There will be **increased traffic and congestion on alternative routes** e.g. Stannaway Rd, Whitehall Road, Clogher Road, Clareville Rd, Terenure Road West, Harolds Cross, Terenure.

### Route 12



## 5. Grounds

There will be significant land acquisition from properties on Grange Road, Rathfarnham Road, Terenure Road East.

There will be **generation of rat-runs and congestion due to traffic rerouting.**

There will be **safety issues for residents** entering and exiting their own properties on wide carriageways, especially if forced to reverse out due to land acquisition.

There will be ;

- **a significant change in character** and historical fabric of the area.
- Loss of on-street car parking and loading areas.
- Loss of pavement width.
- Loss of gardens, driveways, trees, walls.
- Loss of amenity of village
- Threat to viability of local businesses
- Impact on property value

## 5. Grounds

- Only route to city centre will be via Castlewood avenue or or via Harold's Cross
- Minimal increases in passenger capacity means that **citizens will still rely on the car for the majority of all journeys**, especially where traditional bus routes and connectivity disappear under new network plans.
- Traffic issues will be enormous due to road closures, re-routing and reassignment of bus lanes, with significant increase in volume on some roads and rat-runs and congestion on others.
- The network re-design leaves **many Dubliners worse off than before** as many will have **reduced frequency or even discontinuation of routes**, particularly if they live away from the main spines.
- **Multiple bus changes may be required** to complete a journey which previously only required one bus.

5. There are other simpler, more economical options that should be trialled e.g., improved bus priority signalling, congestion charges, more buses

- This plan **will not increase the number of buses** on the road. There are already considerable bus lanes along these routes. Simple enforcement and increasing bus priority signalling alone would create the biggest impact.



## 5. Grounds

- The accuracy of NTA's land acquisition **costs is questionable** as CPO orders will affect prime residential areas. Costs are likely to go well beyond NTA's estimates.
- It is questionable whether the envisioned CPO of land complies with the legal rules.
- Limited exploration of alternatives e.g. introduction of congestion charges, use of counterflows. Limited use of intelligent bus priority signalling.
- By the time this project is completed, it will most likely be **obsolete** and **population growth** may necessitate **a more sustainable solution**.
- The NTA's focus on Bus Connects **fails to plan for long term strategies** that will serve the area into the future.
- The process so far has been highly unsatisfactory. Piecemeal release of the network redesign and core bus corridors has **diluted the public's capacity to meaningfully engage with the consultation phase** and has the **effect of limiting opposition**.
- Public Consultation process has been **confusing, and this has to limited the ordinary citizen's participation**, especially during the **COVID-19 crisis**.

## 5. Grounds

### 5. Effects on community and the ability to circulate in it

- This plan **will change the physical, economical, historical and social environment of our older suburbs forever**. The project will change the streetscapes, it will change the villages, it will change the way communities operate and circulate. It will **turn communities into corridors**. Loss of access, on-street parking and loading areas will devastate traders and businesses along the corridors. As business suffers, villages and **neighbourhoods will decline**.
- Local communities and businesses need to be taken into account, to **ensure safety for everyone in particular children, older people and disabled people**, to **protect the environment and maintain the unique heritage** of these areas. **Older people and people with disabilities are very distressed about the potential impacts** across the bus corridors from Templeogue, Kimmage and Greenhills. They fear being **isolated and stranded for hours every day**.
- **Multiple bus changes** may be required meaning **disabled people, older people, or people with small children** may find **bus travel impossible**.
- **Rathmines** - the impact of this plan may be dramatic especially for those who live there. **The Church of Mary Immaculate Refuge of Sinners Rathmines is 200 years old** - 200 years serving the local community. The proposal of a 'Bus Gate' at St. Mary's School on Rathmines Road Lower would mean no through inbound or outbound traffic except for bus, bicycles,



## 5. Grounds

and taxies. This would directly impact on all the parishioners who attend Church in Rathmines.

- On a very practical level it would mean that **no cars could access the Church and funerals, weddings, baptisms, and all other celebrations would be directly impacted in a negative way.** The older people, and those with mobility difficulties, would be impacted negatively too.
- As the proposal currently stands it would be a disaster for the Parish Church and without any exaggeration could lead to **an impoverishment of the services provided as well as the Church becoming redundant over time.**
- **“Quiet streets” will not be observed** in all reality.
- **Cycling arrangements are unsatisfactory** in many places. The plan will take away cycle lanes from outside **St Joseph’s Boys Primary School.** This is **contrary** to the idea of providing safe cycling for communities. There will be problems getting to schools with this plan.
- The proposed carriageway widths means that there will be significant **land take from hundreds of private and commercial properties.**
- Proposed **road widening is unsuitable development for village areas and residential conservation areas.**
- There will be a **loss of property value, loss of amenity, loss of privacy, loss of parking spaces.**

## 5. Grounds

- **Construction Depot to be located at Terenure Taxi Rank** – This will cause huge disturbance to Terenure Village

- **A Bus gate at Terenure will be untenable**

- Once the landscape and fabric of the historical suburbs is changed, there is no going back. Streetscapes from **Victorian, Edwardian and Art Deco periods containing both listed and unlisted buildings deserve protection**. We should never repeat the mistakes that ruined historic Dublin in previous decades.

We ***strongly object*** to the National Transport Authority Bus-Connects Templeogue/Rathfarnham to city centre core bus corridors.

Yours truly,

Brian Walker

Carol Walker

Alison Walker



## 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.



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**For Office Use Only**

<b>FEM – Received</b>		<b>SIDS – Processed</b>	
Initials		Initials	
Date		Date	

**Notes**