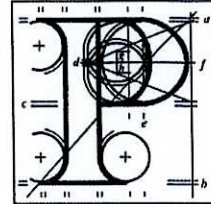


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Cllr. Yvonne Collins
12A Main Street
Rathfarnham
Dublin 14

Date: 17 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

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64 Sráid Maoilbhríde	64 Marlborough Street
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Cllr. Yvonne
COLLINS



12A Main Street, Rathfarnham, Dublin 14. | 086 817 5363 | ycollins@cllrs.sdublincoco.ie

An Bord Pleanála,
An Bord Pleanála (Strategic Infrastructure Division),
64 Marlborough Street, Dublin 1,
D01 V902

Our Ref. YC/LT

14/08/2023

Re: BusConnects – Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

Dear Sirs,

I would like to make the following submissions in relation to the proposed core bus corridor from Templeogue/Rathfarnham to the city centre, concentrating on the corridor within South Dublin County Council.

General observations:

We need a proper public transport infrastructure throughout the Dublin Metropolitan area particularly in areas such as Rathfarnham and Templeogue, which don't have a Dart, a Metro or a Luas nearby. It is essential that we encourage a modal shift away from cars to public transport as soon as possible to reduce congestion, air pollution and most importantly to combat climate change. However, we need to provide, as a feasible alternative, an efficient and reliable public transport system to encourage people to leave their cars at home. I do not believe that buses alone can provide this, as buses alone cannot provide the necessary capacity to cope with existing demand, never mind the projected demand into the future.

I believe that BusConnects has an important role but that ultimately, what is needed is a light rail/ underground system to serve the existing needs of the capital and the needs of our growing population into the future. BusConnects in its current form is simply not the answer. I appreciate that it will take time to achieve a proper and comprehensive light rail/ underground system, but I believe that long term this is the only realistic and feasible solution. We should, in the meantime, concentrate BusConnects on orbital routes where they have been successful, and increase substantially the number of buses on routes going into and out of town, particularly at rush hour. I believe that increased orbital routes and increased frequency on routes going into and out of the city would go a long way towards alleviating traffic congestion.

It should also be noted that traffic volumes are very significantly lighter during the summer holidays when the children are off school. It is generally obvious when the holidays are over as the increase in traffic as children are driven to school is very noticeable. Consequently, I believe that we should actively consider organising an urban school bus system to bring children to and from school, as is done in other countries, as I believe that this would also go a long way towards taking traffic off the roads.

I think the above measures would also encourage more commuters to consider cycling as an option as it would be safer and less stressful with less cars on the road. I believe that eligibility and funding for schemes such as the bike to work scheme should be expanded to allow as many people as possible to purchase electric bikes, which would also be an incentive to switch from driving to cycling.

Templeogue/Rathfarnham to City Centre route:

This corridor, the Templeogue/Rathfarnham to City Centre route, is one of the most contentious routes. It is an older area, and it is difficult geographically to shoehorn the proposed corridor into it. What looks good on a map bears no relation, in my opinion, to the reality on the ground in some parts, and this affects the efficacy of the whole scheme.

I understand that when this scheme was originally being conceived, approximately 23 years ago, that no demand analysis was done, and that the Consultant was not asked to consider options other than buses i.e. no consideration was given to a light rail system/underground. In addition, the network design was based on current rather than potential demand which means that the demand capacity is out of date, given our huge increase in population since.

This corridor, or spine, is the "A" spine. It goes from Rathfarnham/Templeogue to the bottom of South Great Georges Street. The "A" spine also goes from Swords to Parnell Square but there is no connection between the two parts of this spine. There is a hole in the middle of this corridor. It appears that years ago, it was thought that they would connect, however Dublin City Council now wishes to pedestrianize Dame Street from South Great Georges Street to College Green.

If this area is pedestrianised and the buses from either end of the city can't go through, where will they go? The city is the most congested and contested part of the city. The NTA needs to tell us where these buses will go, how many are involved, what will be required to achieve the throughput of buses and what knock-on effect this will have on the surrounding areas. Given the billions of euro in public money being asked for this project, it is essential that full and proper information is provided from the outset to ensure that what is proposed is feasible, sensible and actually results in a significant improvement so that it is actually worth it.

I note the very detailed submissions which have been made by local community organisations and Residents Associations, in particular Recorders Residents Association and Orwell Park (Templeogue) Residents Association. I would ask that the Board please give careful consideration to all of the issues raised and analyses done before arriving at its decision in the matter.

Rathfarnham Castle Park

I have been contacted by many residents who are very concerned, as am I, at the proposal to compulsorily acquire a long swathe of woodland at the boundary of Rathfarnham Castle Park, where it borders Grange Road. Although the Woodland area only takes up a small area of the overall park, it is essential in terms of its biodiversity. The Woodland is located primarily at the boundary of the park beside the Grange Road and is exactly the area where the land is proposed to be taken. Accordingly, any removal of land and mature trees at this location would have a very substantial and disproportionate impact on wildlife and biodiversity in the park overall.

The Woodland area is currently a home to many wild animals including numerous protected species – ashy mining bees, frogs and many species of birds as well as being a significant roosting place for bats. It also contains the wonderful Woodland Playground, which was substantially revamped at considerable cost by SDCC just last year and is extremely popular with children. Many beautiful mature trees are situated just beside the park boundary wall and would be lost if these plans progress.

I believe that the Woodland area of Rathfarnham Castle Park is a vital resource and should not be interfered with for road widening.

I would like to support the very detailed submission made by Rathfarnham Wood Residents Association and ask that proper and detailed consideration is given to all the items of concern raised by them before a determination is made by the board in the matter. I would be obliged if you could please give particular scrutiny to the environmental, hydrological, and hydrogeological assessments carried out to ensure that all of the environmental consequences of the proposal are fully realised, understood and appreciated before any decision is made given the long-term consequences of same.

I note the conclusion that this Residents Association reaches, which I set out below for ease of reference, and confirm that I support this and call on the board to actively consider this as an alternative to that proposed by the NTA:

“Accordingly, the bus corridor should cease at the end of the dual carriageway beside Rathfarnham Village (at the junction with Butterfield Avenue) rather than extending by 450m past the Park. Bus priority for outbound buses could be achieved by simply utilising a bus priority signal (inbound buses already have a bus lane in any event).

This would:

- (1) prioritise the limited bus routes passing beside the boundary of the beautiful Rathfarnham Castle Park.
- (2) save the very substantial quantity of trees and vegetation which are a vital wildlife habitat for the extensive wildlife population in the park including bats and wild birds and other animals, as well as carrying out an important role in absorbing noise, pollution and carbon.
- (3) maintain the peace and tranquillity of the Woodland area which is so important for people with autism and sensory issues, as well as encouraging wildlife to thrive.
- (4) maintain the wonderful Woodland Playground as a serene and nature-filled environment for children to enjoy and explore; and
- (5) preserve the fragile but very important hydrological ecosystem within the park and support biodiversity.”

Positioning of bus stops

I have also been contacted by residents concerned at the positioning of bus stops. I would be obliged if you could please carefully examine the proposals of the NTA in this regard to ensure that the bus stops have been placed in optimum positions to serve commuters on the route, without adversely impacting on any of the communities along the corridors. Proper location of bus stops is of course crucial and should be done in as user friendly a manner as possible whilst at the same time being sympathetic to the local surroundings and inhabitants. Residents are also concerned at the proposed new location of the bus stop at the top of Rathfarnham village, apparently it is to be moved from outside the Texaco garage to just outside the motorbike shop in the village where the fear is that it will not be visible to buses going towards town. This could constitute a health and safety issue if the visibility of bus drivers is compromised such that they are being obliged to brake at the last minute. If this is the case, I would ask that the proposed bus stop is moved further out to ensure that it can be seen.

Woodview Cottage Green, Rathfarnham

There are also huge concerns from residents at the apparent intention of the NTA to use the car park at Woodview Cottage Green at Spider Hill, behind Rathfarnham Village, as a stockyard for machinery for the duration of the construction of the bus corridors. This notwithstanding the fact that the area is a flood plain, beside the Dodder River, and that hazardous materials will be stored here. If it's flooded, the residents are concerned that this could lead to a major ecological incident.

Residents living close by are also concerned that the proposed mitigation measures will be inadequate to counter dust levels and noise pollution and that there may be significant health implications for those with respiratory issues, the elderly and the immuno-compromised. Residents are concerned that the use of the car park as a construction site will lead to the decimation of a widely used community green space, regardless of it being proposed as a temporary site.

In addition, the Dodder Greenway works have just finished here, carried out by South Dublin County Council at considerable cost, part of which was funded by the NTA. The anticipated permeability and uplift to Rathfarnham Village and indeed to the ongoing route as a whole will be severely adversely impacted by the NTA's plans as it appears that an area where these works have just been completed will be dug up again and cordoned off such that an impediment will be in place to the proper use and enjoyment of the Greenway.

Residents ask that an alternative location which is not a flood plain and not close to a housing estate be actively sought by the NTA. They note that there is a site at nearby Cherryfield which would seem to be far more appropriate. They ask that consideration be given to same and I would like to support the residents in this.

Overall, when arriving at a decision in the matter, I would like the Board to consider whether the cost of the works involved, the removal of trees and woodland areas, the impact on our green areas and irreversible change to the geography of our city justifies any benefits of BusConnects in its current form.

I would suggest that a proper study of continuing Metrolink to Southwest Dublin is urgently required before making a final decision in connection with BusConnects.

Thank you and kind regards.

Yours faithfully,

Cllr. Yvonne Collins
Deputy Mayor South Dublin County Council