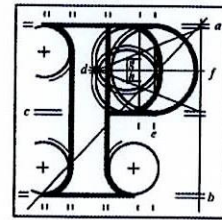


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Christine Artcanuthurry & Lorcan Burke
54 Terenure Road West
Terenure
Dublin 6W

Date: 18 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
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

54, Terenure Road, West,
Terenure,
Dublin 6W
D6WF680

The Secretary,
An Bord Pleanála,
64 Marlborough Street
Dublin 1
D01 V902

14/08/2023

Re: Bus Connects and its impact on Terenure and surrounding areas

Dear Sir/Madame

It was back in 2019 when we first wrote to the NTA regarding this matter, and we had hopefully thought that perhaps some of the points of view that we and others raised would have been considered in the intervening time. Therefore, it was with great disappointment that we read the latest version of the proposals for Bus connect corridors.

After almost 4.5 years we now feel that the objections and points we raised are even more valid, in part, this is borne out by the changes which occurred during and since the Covid 19 pandemic and by the ongoing changes in work practices caused by technology and changing corporate strategies.

Therefore, we wish to again strongly object to the NTA proposal for Bus Connects Corridors 10, 11 & 12 which continues to show a serious lack of a long-term vision for transport for Dublin city and its environs and has serious implications for the residents of Terenure and surrounding communities.

It seems our neighbours and others have expressed the sentiment that we also wished to express, under the banner "Communities not Corridors". This group have eloquently expressed the desire for this to be recognised. Having lived in this area for over 50 years we are well placed to see and benefit from the positive changes to the transport infrastructure.

Transport priorities change as one goes through life with a focus on getting to and from a place of work being a high priority for a long period (if you work) but as a person's life circumstances change, so does the way they live and travel close to their homes. This requirement to get back and forth from home to workplace at specific times of the day is no longer as dominant as it once was, and it also cannot be prioritised over other quality of life issues for thousands of people, just to benefit a certain group for a short period of time per working day and for a period of their lives. Living a distance from a workplace doesn't automatically grant everyone the right to have a transport corridor to and from it while being able to avail of a community space where they live restriction free, to the detriment of the people living in the areas which the *designated corridors* go through. We didn't choose to live on a corridor. We chose to live in a community based upon our family needs and proximity to other family members and amenities. This community is now being designated as a "corridor" and our quality of life will be seriously impacted should these proposals be implemented as currently envisaged.

If implemented these proposals will turn communities into corridors, negatively affecting thousand of people with very little, unproven, unguaranteed benefits for a minority. They will cause untold, lasting,

and irreversible damage to environments and will still not solve the transport problems of Dublin residents.

A more visionary approach is required for once. What sort of legacy does NTA intend to leave for future generations, broken communities? damaged environments?

We have already seen the failed transport policies being reversed in the last 60 years. Train and tram lines being shut down only to be re-opened again 50 years later. Please do not repeat the mistakes of the past. Look abroad and see what can be achieved if there is a vision. Already many years and much money has been wasted on these proposals and there are many objectors and very few supporters of these plans. That is because the proposals are inappropriate and excessive— a **twenty-four-seven plan for a four-hour problem**. Beyond rush hour, these roads are empty and traffic flows freely.

Can we see the research done on traffic times outside peak times? Has there been any research completed on the impact on travel times of smaller journeys that are currently undertaken by the residents in this community. Just a small example, a trip to one of the local supermarkets would be extended by almost 1Km by the implementation of one proposed no right-hand turn ban. Imagine the impact of this and similar nonsensical proposals impacting 1000's of people on a yearly basis. It just doesn't make sense and shows that this has not been thought through. If it has been considered it shows blatant disregard for the environment and a large cohort of residents in many areas.

Some of the proposed changes would be irreversible and therefore have a lasting negative effect on the neighbourhoods for little long-term gain. This, in the name of improving the quality of public transport and reducing journey times by small margins, with absolutely no guarantee that the envisaged benefits can be realised.

Some residents especially older residents will have less access to bus routes because of the increased walking distance to nearest bus stops and the required changes from one vehicle to another for what would today be only one journey. This plan will reduce access to transport to particularly vulnerable sections of the travelling public, both elderly and those with special needs.

It is easy to see how new developments will come about faster than any implementation of these proposals. It seems that the only concession to what will happen in the future, is that the population will rise and therefore drastic steps are being proposed to allow the forecasted increased population to use similar types of transport to that being used today with slight changes to travel times.

One only need look at the rapid changes that occur with respect to transport to see how inappropriate this plan is. There is the slow but steady rise of autonomous vehicles being introduced worldwide, and in Dublin the emergence of electric scooters has shown how rapidly transport requirements are changing and how slow the city is in reacting to accommodate these changes.

Thinking 25 years hence (which we believe is the minimum period that planners should consider for transport infrastructure), the change of how people work and where they work, will also necessitate a change to transport. More and more workers are changing the times and locations of their work which is facilitated by the introduction of new technologies and more flexible work practices. It is not written in stone that workers will continue to flood into the city in the morning and out again in the evening. One only has to look at the changes to the corporate strategies of large firms with respect to workplaces and flexibility of home working. This means that the proposals are addressing a shrinking rush hour peak at a huge cost, to the health and well-being of residents, environmentally and financially.

We question the actual necessity of these draconian measures for such little benefit. Studies have shown that users of public transport are much more satisfied by reliable and dependable information on the times and availability of transport rather than just quicker journey times from Point A to Point B. It's not as if the promised new journey times are really significant, they are only estimates and they definitely cannot be guaranteed.

User satisfaction with better information could be seen by the overwhelmingly positive reaction to the real time information service which was introduced. Knowing when a bus will arrive is much better from a planning point of view than getting 2-3 minutes (possibly) knocked off a journey time, only to lose 1 or 2 mins of this again by alighting from a vehicle and boarding another to continue an onward journey.

However again this is an area in which the NTA has failed, by not providing a reliable system for the display of RTI and more recently scrapping the timetable app in favour of something less useful for everyday commuters. Addressing this issue properly would encourage more use of public transport rather than shortening the journeys by a few minutes as is proposed at such huge expense.

Interestingly, the travel times shown in the info sheets are:

- current,
- improved time with proposed bus corridors and
- extended time without bus corridors due to the changes in population

but **not** forecasted times of future travel time with changes in population, which could not be as good as the improved times shown now.

This type of planning is extremely short term and some similar ideas (such as making Templeogue Road one way at the Terenure end) were already proposed by consultants (and rejected, ask DCC) almost 20 years ago in expensive reports paid for by the taxpayers. Although this may no longer be in the collective memory of the NTA, it should be as it's been paid for already.

These proposals cannot be the way to tackle the problems we are facing now. Recent success stories of the Luas have come at enormous expense after the previous removal of the train/tram services in and around Dublin only a few short years ago. A great example of short-term planning. Imagine if these train lines had been kept intact, how much less expensive the modern Luas service would have been to introduce?

Simple ideas, such as using trams that allow passengers to take bicycles onboard or using flexible direction traffic corridors on existing roads to deal with direction traffic volumes at different times of the day should be considered. These are proven solutions used in other countries which could go a long way to achieving the desired goals without major negative impacts such as:

1. Loss of community by making it difficult to move around the neighbourhood to local facilities, shops, amenities, friends and families. People spend more time making short journeys around the areas they live in rather than commuting. This will be impacted negatively.
2. Major disruption to community living and how people enjoy their environment, visiting friends and family, and taking part in community activities.
3. Destruction of historic homes and gardens, village and community for residents, businesses and visitors.
4. Endangering pedestrians crossing and moving between vehicles and walking longer distances to reach bus stops and dealing with traffic merging onto wider and busier roads.
5. Devastation of the environment as trees, bird and wildlife habitats are eliminated to facilitate the road users.

6. Major disruption as side and connecting roads become increasingly busy with diverted traffic and parked cars. In the last few years Dublin City Council has actively discouraged and made use of these roads illegal at certain times, actively forcing traffic onto main routes, causing the very congestion that is being addressed by proposing now that traffic be actively diverted down side roads with the inevitable endangerment of road users such as children. This will surely be met with further objection by the same residents who requested that traffic be forced away from residential areas onto main routes in the first place. Luckily, it is a decision that can be reversed whereas as stated above, some of these changes are drastic and will be irreversible when some other great "solution" is proposed.
7. Devaluations of homes and neighbourhood at major cost to taxpayers, residents and businesses.

By the time this project is completed, it will most likely be obsolete and population growth may necessitate a more sustainable solution. A study should be done on all the journeys undertaken across communities by multiple groups of different ages, at different times of the day. These cannot be negatively impacted just to save a short amount of time for a workforce to reach a shrinking number of workplaces. To benefit a small number of people / companies. There is no moral justification for this, and it is the wrong way to approach people's needs. Where are the letters/ submissions of people asking for these changes? A small elite and uncaring group cannot and should not be allowed to impose this flawed plan on the community.

The plan is ill-conceived, and it does not take into account the real future requirements of the city. Looking to other cities for inspiration, it can be seen that properly thought out and planned transport systems can service the residents and visitors to cities for well over 100 years. This expensive proposal will be redundant before it is even completed and needs to be re-considered with real long terms options such as a metro service being considered.

One only has to look to cities such as Copenhagen or Cologne to see how transport systems can be radically overhauled for the benefit of all users, without the negative impacts that are implicit in these new proposals. Also, these plans do not take into account the proposed destruction Victorian Heritage of the areas through which the various bus corridors would pass, which would be a disgrace.

On behalf of the current and most importantly the future residents of the City of Dublin (in particular Terenure, Kimmage and Rathgar) who rely on us to do the right thing today, we request that this proposal is reconsidered.

It is critical that the needs of current and future residents and commuters are addressed in an intelligent manner. These proposals do not do this!

Yours sincerely,

Christine Artcanuthurry & Lorcan Burke

