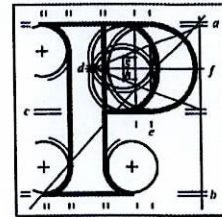


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Ciarán Ahern
Labour Party Representative - Dublin South West
2 Silverwood Drive
Rathfarnham
Dublin 14

Date: 16 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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Submission on Templeogue / Rathfarnham to City Centre Core Bus Corridor

(Case: 316272)

To whom it concerns

I wish to firstly express my broad support for the Bus Connects project. Having grown up in Rathfarnham and now living in the area I am acutely aware of the deficiencies of our existing public transport provision in comparison with other parts of the city. I strongly welcome the Templeogue / Rathfarnham to City Centre Bus Corridor (the “**Proposed Scheme**”) as the biggest investment in our public transport in this part of Dublin South West for decades.

I note that a number of non-statutory consultations have been carried out by the NTA regarding the proposed new Bus Connects routes over recent years. I was pleased to contribute to these non-statutory consultations at the time and I note that a number of changes have been made to the initial proposals following these consultations. I further understand that the present planning application relates solely to the infrastructure needed to better facilitate the new Bus Connects routes.

While I would like to see some further tweaks, I support the Proposed Scheme on the following grounds:

1. Practical considerations relating to the growing population and housing density of Dublin and Dublin South West specifically;
2. Environmental and climate considerations; and
3. Health considerations.

1. Population and Housing Growth

Our population in Dublin South West continues to grow and a growing proportion of our population already relies on public transport and active travel (i.e. cycling and walking) to go about their daily lives. It is important that our road infrastructure is rebalanced to cater for these other road users as well as those using private cars.

Given the ongoing housing crisis in Dublin and across Ireland, and the need to massively increase the supply of social and affordable housing in particular, it must be anticipated that denser housing developments will continue to be proposed and built in Dublin. Many residents will simply not have the means to afford or the space to store a private car and so will be reliant on public transport and active travel. Bus Connects will provide cost-effective transport for households who cannot afford a private vehicle.

Our existing network of narrow roads in Dublin is already at capacity and simply cannot cater for the increased volume of private vehicle traffic that will inevitably accompany our growing population without significantly increasing the provision for and use of public transport and active travel. In this regard I found diagrams 6.6 and 6.7 in Chapter 6 Pages 109 and 111 to be particularly informative. These diagrams clearly set out the differences in people movement in “do minimum” and “do something” scenarios regarding the provision of enhanced bus and active travel facilities over the coming decades. It is clear that doing the minimum will result in ever increasing traffic congestion (and associated quality of life issues) for all road users. It is also clear therefore that that the public transport status quo must change.

It is notable that the Irish High Court recently ruled in favour of Ballyboden Tidy Towns who challenged planning permission that had been granted for a proposed high density housing development in the locality on grounds including that the developer could not demonstrate that there would be sufficient public transport provision for such a dense development.

The increased public transport capacity and availability which Bus Connects will provide, along with provision of other necessary community amenities such as additional schools and child care facilities, doctors, cultural and community spaces, parks and playgrounds, remote working hubs, and shops, is key to the sustainable growth of our city.

In the longer term I fully support and will continue to advocate strongly for the proposal for a Metro South West or a Luas / light rail to be extended from the city centre via Rathfarnham, Templeogue, Knocklyon and Firhouse to Tallaght. The State has unprecedented resources available to it currently due to bumper corporation tax receipts and these surpluses must be ring-fenced and invested in significant capital infrastructure projects such as this which will have long term impacts on our climate goals. However, there is an imperative to reduce emissions from transport immediately (as set out further below) and it is clear that Metro South West is a longer term project (regrettably it does not form a part of the NTA’s draft Transport Strategy for the Greater Dublin Area 2022 - 2042). As such, an enhanced bus network is the best short-term solution. At a time when a metro or light rail is provided for this part of the city it may be necessary to reassess the bus network again.

2. Environmental and Climate

In addition to the practical requirements of providing a public transport network fit for a growing city, it is vital that we implement immediate changes to our transport system to meet Ireland’s binding carbon emission reduction targets between now and 2030 as set out in the 2021 Climate Act and particularised in the Climate Action Plan 2023.

19% of Ireland’s overall greenhouse gas emissions come from transport, with private cars making up approximately 65% of transport emissions in Dublin. As part of the Climate Action Plan 2023 our transport emissions must be reduced by 50% between now and 2030. Transport emissions actually grew in 2022 by 6% so it is clear that urgent and radical steps must be taken to address this.

Some of the emissions reductions will be achieved through the electrification of private cars, taxis, the public transport fleet and HGVs. However, switching to electric vehicles is not the full solution in urban areas. EVs don't reduce congestion, still release significant particulate emissions from tyres, brakes and road wear, and present a huge road safety hazard, particularly due to their additional weight and near silence below 30km/h. This is compounded by the trend towards heavier, taller SUVs with bigger blind spots. As such, a large portion of our legally binding emissions reductions are to come from changing how we use our road space, reducing the distance travelled by car journeys by at least 25% and

ensuring that 50% our travel is done by walking, cycling or public transport. The only realistic proposition for increasing public transport and active travel uptake in Dublin South West up to 2030 is via an enhanced bus and cycle network system. I believe Bus Connects has the potential to transform public transport in our city and county for the better and increasing the capacity, frequency, reliability, safety and connectivity of our public transport network will be key to building trust in and increasing use of the new network.

When it comes to inducing behavioural change in relation to public transport and active travel, all evidence suggests "if you build it they will come". Traffic is not displaced to other roads by new public transport and active travel infrastructure; rather it is removed. Reallocating road space will likely mean some minor restrictions for private cars, which may inconvenience some drivers in the short term. However, the majority of car journeys are taken by a single driver with no passengers so every additional person availing of public transport or active travel takes one private car off the road and leaves more space and less traffic for those who must drive.

I am strongly of the view that we must aim to make public transport and active travel the most attractive means of getting around our city. Providing the appropriate infrastructure to facilitate and prioritise public transport and active travel is a key part of this.

3. Health

Recent studies in Dublin have found that our air quality is deteriorating due to traffic and congestion which poses significant risks of respiratory illnesses. Reducing the numbers of private cars on our roads and electrifying the public transport fleet will have direct public health benefits, as well as reducing noise pollution.

A recent study by DCU found that one in four Irish children "cannot run properly" due to low rates of physical activity in their lives. Regular physical activity through active travel has been found to be one of the most sustainable ways of improving health. Countries with the highest levels of active travel have the lowest obesity levels. Children who walk or cycle to school are more likely to have higher overall levels of physical activity, and physically active older people continue to live independently for longer. The NTA's 2019 BikeLife report has calculated that already, every year in Dublin, the physical activity benefits of cycling prevents 490 serious long-term health conditions, and 52 early deaths annually, which is valued at €263 million.

There are numerous health benefits associated with active travel, all of which the Proposed Scheme will facilitate.

Specific Comments on the Proposed Scheme

1. I welcome the fact that the NTA has made numerous changes from previous versions of the Bus Connects proposals based on feedback from previous rounds of consultations.
2. In particular I welcome the changes made to the cycling provision on Rathfarnham Road meaning that cyclists will be catered for on the main road rather than via circuitous routes through local housing estates. However, I would like to see complete and fully segregated cycling routes on this stretch, which is a particularly busy cycle route linking directly to the newly completed Dodder Greenway. Providing safe, wide, segregated and complete cycle routes is key to encouraging less confident groups to take up cycling.

3. I welcome the transformation of the Spawell roundabout into a signalled junction. This will connect the existing Dodder Greenway and new Wellington Lane active travel scheme that South Dublin County Council has recently built, as well as providing a vastly safer and superior means for pedestrians and cyclists to get through that junction.
4. I am disappointed at the proposal to acquire land at Rathfarnham Castle Park, which is a sanctuary for many residents and visitors, and is home to many beautiful old trees and a new woodland playground. It is especially important for local autistic children who find the natural play space calming and very beneficial from a sensory perspective. It is a diverse wildlife habitat, with many protected species including bats, birds, bees, frogs and many others. I would hope that, rather than widening the road, consideration would be given to providing bus priority for outbound buses by way of signal-controlled bus priority lights at the Rathfarnham Village by-pass (at the junction with Butterfield Avenue) or some other creative solution e.g. a bus gate, bus priority lights (with necessary enforcement measures) or one-way or contra-flow traffic systems (possibly only at peak hours). Given the importance of this woodland area both in terms of biodiversity and for vulnerable groups such as autistic children, every effort should be made to avoid this loss of important (and increasingly scarce) urban parkland.
5. I welcome the bus gate in Rathmines and would be in favour of seeing similar creative traffic management systems such as this along the route.
6. I would like to see electronic bollards and other filtered permeability measures used to prevent the potential for rat running through local estates.
7. Overall I would prefer to see the re-allocation of existing road space for public transport and active travel at all parts of the Proposed Scheme, rather than any compulsory land acquisition. Compulsory purchase orders run the risk of legal challenges and related delays to the roll out of this vital infrastructure, and of course will result in disruption for the residents concerned.
8. I note the submission on the Proposed Scheme from Dublin Cycling Campaign and endorse the points made regarding the need for further revisions to the Proposed Scheme to provide for enhanced cycle track widths, cycle track continuity, filtered permeability networks, quiet street treatments and speed limits.
9. A strong and sustained communications campaign must accompany the new bus routes and infrastructure. Significant advance notice must be provided to allow individuals to understand any changes that they may be required to make to routes they are accustomed to driving and to plan their journeys. Previous rounds of NTA non-statutory consultations regarding Bus Connects were accompanied by significant helpful literature in both hard copy and electronic format and it is important that this is rolled out again on commencement of the Proposed Scheme.
10. If the NTA envisages that it may be necessary to further restrict private cars from certain roads over time if public transport needs increase, it would be helpful to outline the future strategy in this regard sooner rather than later and to outline how those who do not have any choice but to drive can be facilitated.

Immediate Enhancements Needed

I am keen to see this planning application for the infrastructure required for Bus Connects approved without delay. However, in the meantime, certain vital improvements to our Dublin Bus network can be implemented immediately:

- The bus network redesign should commence;
- Increased number and frequency of busses on all routes;
- Increased reliability of real time passenger information (“ghost” busses must be eliminated);
- Enhanced safety measures on busses for the benefits of both passengers and drivers;
- Contactless payment on busses;
- €9 monthly integrated transport ticket allowing unlimited travel on all modes of public transport;
- Free public transport for children and students.

Conclusion

The latest polling suggests that 60% of people are willing to make changes to their personal lives to support climate action and 90% of car drivers are willing to leave their car at home in favour of walking, cycling and public transport for short journeys of less than 2km.

I believe it is the responsibility of public representatives to lead on matters which will be of benefit to our communities, but which require considerable public buy-in and around which there are can be some understandable concerns. It is incumbent on all responsible public representatives to communicate the societal benefits and practical necessities of changing how we move, and to engage with the responsible authorities to address reasonable concerns.

In Dublin South West the most effective means we have of reducing our greenhouse gas emissions in the short term is to switch from driving to walking, cycling or public transport for as many journeys as possible. Bus Connects and its active travel infrastructure will facilitate the 50% of the population that the Climate Action Plan 2023 states must use public transport and active travel if we are to meet our climate goals and create a sustainable city and climate for future generations.

I ask that an Bord Pleanála approves the Proposed Scheme, subject to the above alterations.

10 August 2023

Ciarán Ahern

Labour Party Representative - Dublin South West

2 Silverwood Drive

Rathfarnham

Dublin 14