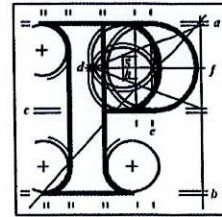


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Claudia Gentile
136 Rathgar Road
Dublin 6

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.

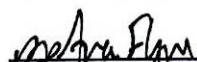
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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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SUBMISSION TO AN BORD PLEANALA

RE: BUS CONNECTS BUS CORRIDOR

TEMPLEOGUE/RATHFARNHAM TO CITY CENTRE

APPLICATION: 316272

I am a resident of Rathgar Road and I agree with the many valid points made by Paula Moore on behalf of The Rathgar Residents Association and Councillor Anne Freeney and have copied both observations below. They both capture all the points I would have made and many, many more. I do hope you will consider all the submissions made, and please think carefully about the long-term, mainly negative, impact to the communities living along this planned corridor and not just about those who will travel on it. For all the money that is being invested here, there must surely be a better way to improve public transport without destroying the city and its communities.

Claudia Gentile

136 Rathgar Road

Dublin 6

14 Aug. 23

Rathgar Residents' Association fully supports improvements to Dublin's bicycle lanes and public transport network, in particular from an environmental and public health and safety perspective. However, we also believe that Dublin's environment, heritage and community should not be compromised by the introduction of the bus corridor proposed by BusConnects. In its current form, it promises to save commuters mere seconds off journey times.

We submit that the price is too high for so little gain: heritage, trees and wildlife are threatened across Dublin. Key concerns for the Rathgar area include the impact on environment including increased emissions, noise and loss of trees, Compulsory Purchase Orders on Terenure Road East (and further afield on Rathfarnham Road), traffic implications on all local streets and roads, the negative impact on the public realm and streetscape, the bus gate at St Mary's College in Rathmines, one way traffic, right/left turn bans and the impact on the businesses in Rathgar during construction phase and due to loss of parking in the village and in the area. The RRA is also enormously concerned about the proposed reduced width of footpaths in the

Rathgar area and also question the overall safety of the proposed cycle paths. Road-widening, which threatens the architectural layout of our streets and will require the felling of mature trees, is strongly opposed by Rathgar Residents Association. Residents on many of our smaller streets and roads will suffer as a result of increased traffic flows and parking issues. Many villages across Dublin are at risk of losing their identity due to the proposed Busconnects design which is based on outdated road widening and indeed outdated traffic count data which was collected in November 2019 and February 2020. This data is no longer indicative of the traffic flows in and around Rathgar as residents can attest. CSO statistics reveal the change in commuter traffic and in the continuation of working from home patterns by so many workers.

Terenure Road East, Rathgar Village and Rathgar Road are not bus corridors. They form a residential area with schools, hospitals, places of worship, shops and a vibrant community. Spanning out from these roads are a myriad of smaller roads and streets which have their normal ebb and flow. BusConnects' plans propose a total change in the dynamic of these roads, in particular Highfield Road which will now see an increase of traffic and the introduction of a new Orbital bus route. Many

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other side streets in our area will suffer devastating knock on effects including increased traffic, increased emissions due to congestion, one way systems and parking issues. What the NTA has refused to do, however, is to the trial the proposed traffic changes.

Rathgar Residents Association submits that a comprehensive underground metro would allow Dublin's residents, commuters and visitors to access the city and its environs whilst saving Dublin's environment, built heritage and special character. The introduction of school buses would also make a vast improvement to the lives of both families and residents across Dublin.

The NTA admitted in its own material (page 3 public consultation January 2019) that: "Growth areas can only be served in the short and medium term by the bus as

opposed to the long-term projects such as rail and luas.”

Four years have passed since that statement was made. The NTA admits that this is a short term solution which cannot possibly deal with the real issues; so why fell mature trees? Why CPO land to widen roads? Why undermine established communities? Why permanently destroy the Georgian and Victorian heritage of niche urban villages?

As a short-term solution there are many changes that could be made to make the current bus system more efficient at no cost to community and villages. These include policies aimed at reducing private cars on our roads; for example, implementing congestion charges and comprehensive park and ride facilities. Contactless payment has not been introduced despite being in use in neighbouring jurisdictions. In an age when payments are made via smart phones and/or Revolut, for example, the NTA has consistently failed and/or delayed the introduction of such measures in Dublin.

It is also noteworthy that the NTA has not proposed a new park and ride facilities at the Tallaght/Tempoogue M50 turn-off to encourage car drivers out of their cars and onto more environmentally friendly bus services (in the absence of a metro). The NTA is making no actual effort to take cars out of the system in South West Dublin nor is it encouraging commuting traffic to swap to bus services as they enter Dublin City which. Either would ease congestion on our streets and improve South West Dublin’s air quality without requiring infrastructural changes.

There are steps that could be taken now which would improve bus times. It is impossible to understand why the NTA has delayed measures which would prioritise buses over other traffic. The NTA should also be required to introduce non-invasive measures to improve bus journey times for example by introducing priority bus lights, cashless fare on buses and other technical advances. It is exasperating – and frankly cynical - that these measures, in particular cashless fares, have been linked to this BusConnects planning vehicle.

One is left with the impression that the NTA is artificially attempting to obscure that these costly infrastructure changes will provide little improvement in time saving to the bus commuter journey by bundling the tried and tested non-invasive time saving

measures in with the bus corridors in an effort to ensure that some positive time saving can be pointed to. This can be the only logical reason for the NTA's refusal to deploy effective modern computer-led solutions to bus time savings. There is simply no sound basis for resorting to archaic road widening and tree removal. Jennifer McElwain, Professor of Botany at Trinity College Dublin, made a submission to the NTA against tree felling. We rely on that submission as hugely valuable trees are still to be lost unnecessarily. (See submission attached for your convenience.)

Rathgar Residents Association urges that all non-invasive improvements be made before any irreversible and detrimental changes are made to our villages, streets and the environment of Dublin and the Greater Dublin Area. We also believe that any proposed measures should be trialled before planning is granted to fully ascertain the impact of the BusConnects' proposals, particularly as traffic modelling as been performed in a piecemeal fashion. The traffic implications of all 12 corridors running concurrently have not been modelled let alone trialled in real time.

The true cost of the environmental fallout of traffic and congestion cannot be understood until traffic modelling for the entire Busconnects project is performed. Therefore, the Environmental Impact Assessment (EIA) submitted by the NTA for this corridor is fundamentally flawed and is not fit for purpose as it does not take into account the fall-out of other bus corridors in the area for example the Kimmage to the City Centre Corridor etc.

Given that the NTA has not proposed any new park and ride facilities for this bus route - and in view of the fact that it is the NTA's own stated aim is that BusConnects is intended to make it more difficult to drive a car in Dublin - an inevitable impact of this proposed corridor (with the traffic changes) is that there will be more not less car traffic; it will simply be rerouted. The NTA proposal offers no alternative parking solutions for commuters. Therefore, they will be forced to make enormously circuitous routes to the city centre thereby increasing emissions, and causing further negative environmental and congestion impacts. The traffic implications for residents

and commuters alike have not been modelled; we fear that that is a deliberate lacuna in the data as it would reveal the chaos that will ensue.

In an age where AI is capable of so much and where there have been huge technical advances, traffic modelling is essential prior to any major road infrastructure project. If the NTA does not have access to the technical capability to model all 12 corridors across the wider Dublin area and has not performed this task, then planning permission cannot be granted. The data has simply not been collated. The plans are based on outdated traffic count data, fragmented and disjointed modelling, and a wholly inadequate EIA. We have been asking for this to be done from the outset. RRA submits that the current plans overburden Rathgar village and surrounding roads with an increase of bus frequency which will be detrimental to the liveability of our village and area. The NTA's insistence on routing all buses from Templeogue/Tallaght and Rathfarnham through Rathgar Village puts a disproportionate burden on Rathgar (and on Rathmines). These bus routes could have easily been separated with a bus service interconnection in Terenure Village and separate bus services along Terenure Road East (towards Rathgar) and,

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alternatively, along Terenure Road North and Harolds Cross Road. Indeed, the interconnection of bus services lies at the centre of the Busconnects ethos so it is very difficult to understand the proposal to route all those buses along one route only (through Rathgar).

Moreover, it should be noted that all NTA Busconnects infrastructure public consultations separated the Tallaght/Templeogue to Terenure Village and Rathfarnham to City Centre corridors into two distinct separate consultations and are only now joining both corridors together for the ABP planning process.

Forcing all buses through Rathgar has the direct impact of overwhelming Rathgar village and community. The route had previously been designated as a cycle route, but that too has been reversed by the BusConnects proposals.

The NTA proposals will also lead to an inadequate public transport service for

Harolds Cross Road which is experiencing a huge growth in housing and education facilities.

A major flaw in the BusConnects' plan for this corridor is that the N81 and R137 have been inexplicably bypassed. For years, the Rathfarnham to City Centre Quality Bus Corridor (QBC) has used the Harolds Cross Road as its route into the city centre.

The R137 was identified as a QBC because it is a shorter, more direct, unconvoluted, and wider route to the city centre. Instead, BusConnects plans to have buses turning down the mainly residential Terenure Road East.

Signage in Terenure currently directs incoming city traffic via Harolds Cross Road.

The NTA's decision to totally discount the Harolds Cross Road has the effect of leaving a large wedge of the city underserved by public transport while overburdening Rathgar and Rathmines, the latter which is already serviced by the Luas (at Beechwood and Charlemont).

Prior to BusConnects, there was BRT – Bus Rapid Transport. The Rathfarnham to City Centre Core Bus Corridor Report titled 'CBC FEASIBILITY STUDY AND OPTIONS ASSESSMENT REPORT' and dated December 2017 written for the National Transport Authority by DBFL Consulting Engineers and Transportation Planners and which can be found in the NTA Busconnects documents supporting this planning application on the NTA's website

<https://templeoguerathfarnhamscheme.ie/> is a key document in this planning application. It is the scoping and feasibility study that the entire corridor is based on.

It states:

"The Clongriffin – Tallaght BRT is of particular relevance to section 2 of the Rathfarnham CBC route. The CBC route should complement the BRT service but should not duplicate the potential routing of the Clongriffin – Tallaght BRT route, which is likely to travel via the Harold's Cross corridor as per the Transport Strategy for the GDA (2016 – 2035) and identified in Figure 1.2 of this report."

The above section of the feasibility and options report has huge implications for this planning application. The Clongriffin – Tallaght BRT project while viable in 2017

when the report was written - has since been abandoned. However, the fact that the Harolds Cross Road was excluded at the earliest stages of this current BusConnects project and never fully assessed and analysed is a fundamental flaw of this project.

During public consultations with the NTA, the above flawed analysis was highlighted to the NTA by RRA and individually by residents. An alternative routing of this proposed corridor via Harolds Cross Road was proposed, but the submission was dismissed by the NTA with a few paragraphs of generic text in the submission analysis. Failure to consider the Harolds Cross Road comprehensively – in circumstances where it was originally identified by the same agency for BRT – wholly undermines this planning application. A full rescoping feasibility study and option assessment, including population growth and access to bus services, is required. A refusal to acknowledge the flawed exclusion of what is a major traffic route from consideration when selecting routes leaves huge gaps in the credibility and soundness of this planning application.

Rathgar Residents' Association relies on the submissions and expert reports submitted during the consultation process by Rathgar Road Residents Group and the Terenure Road East Residents Group. Additionally, we support the individual submissions to ABP of our Rathgar Residents' Association members (some of whom are also members of the Rathgar Road and Terenure Road East residents' groups) and of the residents' associations in the South West of Dublin.

Regards,

Paula Moore

Vice Chairperson

Rathgar Residents Association

PO Box No. 9574,

Dublin 6

"I support the development of more user friendly and environmentally friendly transport solutions including cycling, Luas, Metro and low emission buses together with low emission cars.

While this submission relates to the Templeogue/Rathfarnham to City Centre application from the NTA, it is my view that it should be considered in conjunction with the Kimmage to City Centre application which has also recently been lodged. Both of these applications have implications for local residential areas, cyclists, traffic flows, air quality and the environment impact.

The following should, in my view, form part of the decision process:

- The benefit of having public oral hearings in relation to Bus Corridors to ensure more comprehensive public consultation, particularly given the restrictive online-only consultation during the final phase of design of the Bus Corridors. (Ref. Aarhus Convention).
- Best practice design hierarchy principles for transport and active travel strategies
 - Pedestrians – safe for walking and access to frequent public transport
 - Cyclists – continuous safe cycling lanes; most direct routes
 - Public Transport – frequent services; adequate capacity; accessible for all
 - Private cars/vehicles – secondary to public transport
- Dublin City Council's development plan and emphasis on development of urban villages (15 minute cities).
- The many submissions from local residents and residents associations
- NTA's very limited projection for increasing the number of buses to cater for current and future demand.
- Frequency and accessibility to buses/public transport should be key rather than speed to destination (which is by NTA's own admission modest on this particular Bus Corridor).
- Volume of HGVs diverted onto narrow residential side roads due to Bus Gates needs to be critically analysed in terms of environmental impact and congestion.
- Number of new banned right hand turns for diverted traffic. An Garda Siochana will not be in a position to enforce all of these and as a result, they may be ineffective in terms of managing traffic flows and congestion in Terenure, Rathgar and Rathmines.

General Observations:

I fully appreciate the need for a greatly improved, environmentally friendly public transport system to better serve the people who live, work and visit Dublin. The Active Travel programme being

progressed by Dublin City Council is part of this, as are Bus Connects, Luas, Dart and Metro. Many of the proposed and planned bus corridors can work effectively on the outer parts of the city where roads are wide and with capacity for dedicated lanes for buses. However, I have reservations about the applications for some of the Bus Corridor proposals and in this case the

Templeogue/Rathfarnham to City Centre one. Some aspects of this application are not sensitive to a more comprehensive and multi-user approach to urban planning, particularly when there will be:

- no appreciable increase in buses on the route (NTA source) to meet an increase in demand.
- no significant reduction in time from start to city centre
- insufficient design of continuous safe cycling direct routes
- Significant negative impact for adjacent residential roads with introduction of 24/7 or lengthy bus gates on main arterial routes to the city centre. Dublin City Council traffic officials have confirmed that the current priority bus traffic lights on Templeogue Road and at three other locations in the city work very effectively.
- Significant cost of compulsory purchase orders to properties on the corridor
- Felling of trees where it is not necessary for cycling routes (I.E. Bushy Park and Rathdown Drive median). Safe cycling already in place in both these areas.
- No clear up to date data of the combined traffic impact of proposed Bus Gates and Templeogue/Rathfarnham Bus Corridor and Kimmage Bus Corridor.

Specific Observations for local areas on the proposed Bus Corridor:

TERENURE

The proposed Bus Gate on the current main arterial route from Tallaght to city centre will result in effective closure of Templeogue Road inbound, resulting in traffic from Templeogue and Tallaght being routed onto Springfield Road toward Rathfarnham or onto Fortfield Road down toward the KCR junction where another Bus Gate (Kimmage Bus Corridor) will stop traffic from going on this arterial route of Lower Kimmage Road into the city. Redirected traffic will have to either turn left onto Kimmage Road West (toward Crumlin) or right onto Terenure Road West for city centre. In addition to the diverted traffic, access for local residents to their homes will be impacted by increased congestion on these roads and other adjacent side roads. Access in and out of Terenure Garda station (Terenure Road West) will also be potentially hampered by volume of diverted traffic.

- Road Closures – Templeogue Road inbound at entrance to Fergus Road

- Banned Turns

- Right turn ex Templeogue Road into Rathdown

- Right turn ex Fortfield Road into Greenlea Road and Lavarna Grove

- Road Widening – Terenure Road East (adjacent to church and bus stop)

- Tree Felling

- Close to Terenure Church

- Unclear re median between Templeogue Road and Rathdown Ave and Drive

- Extra traffic on Fortfield Road, Terenure Road West, Greenlea Road, Lavarna

- Bus Stop move – Outbound to Westbourne Road to be removed; Bus stop at Templeogue Road at Terenure College also to be moved.

- Terenure Cross:

- o No slip lane at Bank of Ireland for turning left?

- o Construction Depot at car park in Terenure village for duration of construction of Bus Corridors.

- o Sharp right hand turn for buses at Terenure village junction (from Rathfarnham road to Terenure Road East) – dangerous junction currently.

- o Taxis (as well as buses) will be able to turn right onto Terenure Road East

- o Traffic light sequencing negative impact for Terenure Road West and other converging roads. Current sequencing results in lengthy back logs on Terenure Road West off peak as well as peak times.

RATHGAR

- Road Closures – Rathgar road outbound (all turns into Rathgar road) will be affected by one-way system).

- Banned turns – onto Rathgar road and slipway outside Supervalu (parking bay to close)
- Roads that will get extra traffic – Highfield road
- Bus stops to move – Rathmines Park inbound and Garville Ave inbound will be removed; Brighton Road outbound will be removed.

RATHMINES

- Road Closures – Lower Rathmines Road closed to through traffic in both directions with a Bus Gate from 6am-8pm between entrance to St. Mary's and Lissenfield.
- Mountpleasant Ave. cut in two at Bessborough (areas to the north can only be accessed from the Grand Canal. Areas to the south will be accessed via Ranelagh or Rathmines village).
- Banned Turns – left turn into William's Park and any exit out of Williams Park (right turn will be permitted out of Leinster Road)
- Roads that will get extra traffic – Castlewood Ave; Castlewood Park; Church Ave; Grosvenor Rd and Place (7am-10am and 4pm-7pm); Leinster Rd; Belgrave Sq; Rathmines Road Upper. Harold's Cross (area between Templeogue/Rathfarnham Bus Corridor and Kimmage Bus Corridor)
- Road Closure – Kenilworth Road at five way junction will be closed outbound.
- Roads that will get extra traffic – Terenure Road North
- Cycle Lanes – continuous safe cycling route from Terenure Village to Harold's Cross Park both ways
- Bus service frequency – Currently served well by the number 16 will have a much reduced bus service.

KIMMAGE

- Bus Gate at Lower Kimmage Road (Ravensdale Park junction) and at Mount Jerome. Impact will not only be for Mount Argus and Kimmage, but also for Terenure and Harold's Cross.
- Roads that will get extra traffic Terenure Road West, Clareville Road, Larkfield Ave, Larkfield Park, Sundrive Road

Conclusion:

In conclusion, Bus Corridors with no appreciable improvement in bus numbers are an over-engineered and costly approach for the Templeogue/Rathfarnham route. There is inadequate

consideration of cycling requirements in terms of direct and continuous safe cycling lanes; the impact for pedestrians and businesses in urban villages that the Bus Corridor goes through; the

residential roads impacted by severity of Bus Gates; access for local residents who will have to make long diverted journeys (more emissions) to reach their homes due to banned turns and congestion on otherwise quiet roads. This application is based on the needs of buses and not necessarily their users. There is no appreciable increase in buses or reduction of travel time and this can be confirmed with the NTA.

The introduction of Bus Gates on Templeogue Road, Rathgar Road, Lower Kimmage Road and Rathmines Road Lower are unnecessary given that Dublin City Council's 'Priority Traffic Lights' are a proven solution to manage easy flow of buses with much less adverse impact on adjacent residential roads.

Longer term solutions must be considered for our capital city and include environmentally friendly Light Rail and/or Metro South West for a growing part of the south west of the city to properly meet the needs of future generations of commuters and to incentivise greater building density along these type of commuter routes. Bus Corridors where they make sense should be progressed but consideration of Metro South West would be a much better long term planning solution for the south west of the city.

I appreciate you considering the issues I have raised and I trust that An Bord Pleanála will take on board all of the submissions made in relation to this application in arriving at the right planning decision for commuters, residents, businesses and local communities''.

Councillor Anne Feeney PC

Dublin City Council

8/8/2023