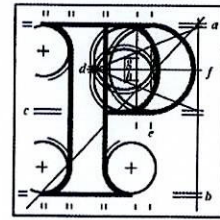


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Cliona Mullen
34, Grosvenor Road
Rathgar
Dublin 6

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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Glaó Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

**34, Grosvenor Road,
Rathgar,
Dublin 6.**

15 August 2023

An Bord Pleanála (Strategic Infrastructure Division),

64 Marlborough Street,

Dublin 1,

D01 V902

Re: Case 316272 - Submission re Tallaght and Templeogue/Rathfarnham to City Centre Core Bus Corridors

Dear Directors,

I participated in the Public Consultation in relation to the Bus Connects Project as it relates to the routes from Tallaght and Rathfarnham through Terenure/Rathgar/Rathmines to Dublin City. I also made a Submission in 2019 to the National Transport Authority in relation to this matter.

I am a Rathgar resident and take great pride in Rathgar's heritage and its many historic buildings and architectural features. The streetscape and public realm of the Rathgar area is an historic urban village and an important part of the fabric of Dublin. I also take great pride in the real sense of community in Rathgar and the nearby villages of Terenure and Rathmines.

The National Transport Authority has applied to An Bord Pleanála for approval for a proposed road development consisting of the BusConnects Corridor for Templeogue/Rathfarnham to the City Centre. This proposed bus corridor would cut through Rathgar and has very significant negative impacts for Rathgar Village and all of the surrounding roads as well as the villages of Terenure and Rathmines.

The claimed gains to the overall average speed of buses are too small to justify the destruction of the architectural heritage of the area and the burden being placed on the community in Rathgar and the surrounding area. Some of these gains in speed of travel along the route are due not to the proposed infrastructural changes on the route but are due to the removal of a number of bus stops, which will not be to the benefit of the community in the Rathgar area who use the routes.

While the initial Busconnects proposals have been amended through various iterations of NTA led "public consultation", the plans continue to unnecessarily overburden Rathgar village and surrounding roads, but offer little benefit by way of improved public transport for the residents of South Dublin residents.

Whilst I support improvements to Dublin's bicycle lanes and public transport network, in particular from an environmental and public health and safety perspective. However, I strongly 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.

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 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 impacting on access to the Church of Mary Immaculate Refuge of Sinners in Rathmines.

As a pedestrian, I am also very 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 which contradicts all the stated objectives of our country in relation to limiting damage to our environment in an effort to minimise climate change.

The proposed Busconnects design is based on outdated traffic count data which was collected in November 2019 and February 2020 which is pre Covid restrictions. This data is no longer indicative of the traffic flows in and around Rathgar. I have timed photographic evidence of traffic flows along Rathgar Road in both a northerly and southerly direction at peak times during the day in 2019 and also in 2022 and 2023 which I would be happy to submit to illustrate this change in traffic flows post the ending of COVID restrictions. CSO statistics confirm the change in commuter traffic and in the continuation of working from home patterns by so many workers.

Terenure Village, 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 which are primarily residential. Bus Connects' plans propose a total change in the dynamic of these roads and this community. For what benefit? If the proposed routes 10 and 12 proceed as planned by the NTA, our area will suffer devastating knock on effects including increased traffic on side roads, increased emissions due to congestion. The proposed routes are a short term solution for public transport in our city and a total waste of taxpayers money.

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 its BusConnects proposal 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? This is a repeat of poor planning /lack of planning in Dublin in the 1960s, 1970s and 1980s which resulted in the wanton destruction of our city's heritage.

The most appropriate solution is a comprehensive underground metro which 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.

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 between the canals and comprehensive park and ride facilities, roll out of proper contactless payment.

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 would ease congestion on our streets and improve South West Dublin's air quality without requiring infrastructural changes. Indeed the publication this week of the results of local air quality measures is extremely concerning for the residents of Dublin city, especially people living along the proposed bus corridor for the combined No 10 and 12 routes. This NTA proposal will lead to a significant decline in our air quality which is not acceptable under any circumstances, and incredible at a time when our country is aiming to improve air quality for all citizens. This will also have a direct adverse impact on the health of the residents in our community.

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.

Any measures should be trialled before planning is granted to fully ascertain the impact of the BusConnects' proposals, particularly as traffic modelling has been performed in a piecemeal fashion. And is based on totally outdated commuting patterns from pre COVID restrictions. 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. Based on this, 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.

The current plans overburden Rathgar village, Rathgar Road 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 Tempoogue/Tallaght and Rathfarnham through Rathgar Village puts a disproportionate burden on Rathgar and 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, 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 and Rathmines..

Moreover, it should be noted that all NTA Busconnects infrastructure public consultations separated the Tallaght/Tempoogue 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 has experienced a huge growth in housing since 2019 with 3 significant new apartments complexes, and where a very sizable new school is being developed at the former Harolds Cross Greyhound Stadium to cater for the growing population and young families in the surrounding area and further afield. The transport needs of the residents of Harolds Cross and future students in the new Educate Together school are totally ignored by the routing of all of the bus routes through Rathgar.

The NTA's decision to totally discount the Harolds Cross Road has the effect of leaving a rapidly growing area 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).

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. 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 NTA planning application.

A full rescoping feasibility study and option assessment, considering population changes in the last 3 years and updated future projections, changed commuting patterns, updated environmental assessment study and access to bus services, is required.

I would be grateful if you will consider my objections in your review of this application.

I also appreciate that the Bord has sole discretion in deciding whether to hold an oral hearing in respect of this case. I wish to register my request that, given the fundamental flaws in this application and the known adverse outcomes for the residents of our community as well as the fabric of our city, that the Bord hold such a hearing.

Yours faithfully,

Cliona Mullen