

Conor Ryan & Siobhan Ryan  
38 Brookvale Downs  
Rathfarnham  
Dublin 14

**Date:** 15 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](mailto: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

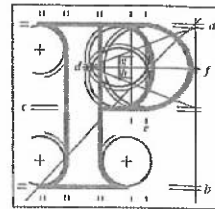
HA02A

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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Conor Ryan and Siobhan Ryan  
28 Brookvale Downs  
Rathfarnham  
Dublin 14

*NOTE: Letter issued  
to incorrect address in  
error. Letter reissued  
to 38 Brookvale Downs*

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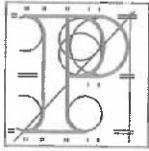
Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02

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64 Sráid Maoilbhride 64 Marlborough Street  
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An  
Bord  
Pleanála

## SID Online Observation

Online Reference  
SID-OBS-001012

### Online Observation Details

Contact Name  
Conor Ryan

Lodgement Date  
09/08/2023 21:11:53

Case Number / Description  
316272

### Payment Details

Payment Method  
Online Payment

Cardholder Name  
Conor Ryan

Payment Amount  
€50.00

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

Yes  No

Request Emailed to Senior Executive Officer for Approval

Yes  No

Signed

EO

Date

### Finance Section

Payment Reference

ch\_3NdIjUB1CW0EN5FC1kpyBPYV

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board  
Member

Date

Date

## **Introduction**

I would like to take this opportunity to submit some observations to An Bord Pleanála in relation to Bus Connects Corridors 10 and 12. Both of these Corridors overlap from Terenure Village onwards to the City Centre. Having grown up in Terenure but now living in Rathfarnham, I am familiar with the built and natural environments along each route.

Rathfarnham, Rathgar, Rathmines and Terenure are communities with busy urban Villages that developed over generations within which many more public and private services exist. This distinguishes them from the outer suburbs of Dublin and satellite towns, which too often have a dearth of services by comparison such as banks, flower shops, health centres, libraries, restaurants and schools.

Preserving the community feel of these above Villages while improving public transport should be a central consideration for An Bord Pleanála. At present, there is a concern among residents and small business owners that the Villages will come to resemble Donnybrook, which is somewhere buses speed through on the way to the City Centre.

Like many other residents, I have engaged in the public consultations since 2017. In doing so, I have attended meetings and submitted observations to the National Transport Authority. Some of them were taken into account based on the final version of the Third Round published in November 2020. However, some were not much to my bewilderment.

## **Bus Stops, Infrastructure & Timetables**

I would like to start off by saying that the reduction in bus stops along both routes is to be welcomed. This should quicken up the journey time along key stretches with less frequent stopping and starting of buses. In return however, there should be more sheltered bus stops with real-time information available to view for those who do not necessarily operate a SMART phone plus additional seats to accommodate the less abled in our society.

To date, in my experience, the new Transport for Ireland App is less user friendly than the now defunct Dublin Bus App. It remains to be seen whether the service under Bus Connects improves due to the occurrence of 'Ghost buses. The 15B/16 buses that operate along what would be Route 12 were among the worst performing Dublin Bus services in recent years based on a Freedom of Information request submitted to the National Transport Authority that I shared with TDs and other public representatives.

Based on a separate submission I made to the National Transport Authority (NTA) there is no way to determine if Route 12 will result in more buses serving commuters than at present over a 24-hour period. It is not possible to obtain bus timetables for either Route after when the services will become operational. At present, the NTA can only provide an indicative bus timetable. In contrast, anyone can download the timetable for the 16 route and calculate the number of buses that should serve Terenure Village on a typical Tuesday. An Bord Pleanála must consider the actual capacity of the new routes' vis a vis existing services before given the new routes the go-ahead. What commuters do not need is a deterioration in the frequency of service.

## Preserving the natural environment



Unfortunately, it is envisaged that a section of what is Bushy Park in Terenure will be turned into a new bus lane along Route 10. In order to do this, large broad leafed mature trees along Templeogue Road opposite Terenure College would have to be felled. This would impact on the overall ambience of the park while walking around its periphery. It would also result in traffic being far closer to pedestrians and players of Templeogue GAA Club and St Joseph's boys' national school who both use the Gaelic football pitch adjacent to Templeogue Road. It should also be pointed out that wildlife such birds and bats use these large trees as part of their natural habitat for nesting.

Preserving and restoring Europe's rich biodiversity is one of the EU's top priorities, as outlined in the EU biodiversity strategy for 2030. Biodiversity is not only important in its own right; it is also essential for our economy and well-being. The Birds and Habitats Directives form the cornerstones of EU biodiversity policy. They provide a strong legislative framework for all EU countries to protect the most valuable and threatened biodiversity. Together, the two directives have also created the Natura 2000 network, which is now the largest coordinated network of protected areas in the world. At present, there is already a perfectly good bicycle lane in Bushy Park that 'all users share' heading out of the City Centre. Cyclists heading into the city could also be accommodated with a crossing point at Our Lady's School adjacent to Bushy Park.

Bushy Park House and Estate was the Shaw family home from 1796 until its sale to Dublin Corporation in 1953 for a very modest sum. Dublin City Council attempted to turn part of this large public amenity into a car park adjacent to Templeogue in the past. Thankfully, the planning authorities at the time rejected their application. An Bord Pleanála should reject the NTA proposal under Route 10 to widen Templeogue Road and cut the existing large broad leafed mature trees.



### **Compulsory Purchase Orders for Road Widening**

Similarly, there are also stretches elsewhere along Terenure Road East (27 properties) and the Rathfarnham Road (33 properties) after the Texaco Petrol Station and over Pearse Bridge into Terenure Village, where the natural and built environment would be affected were proposals to go-ahead. The existing bus lane has no fixed camera to deter car drivers from using it from 7-10am and 4-7pm at busy commuting times. Were one to be installed, it would remove the necessity for gardens to be compulsory purchased in order to widen the road.

### **Cycling**

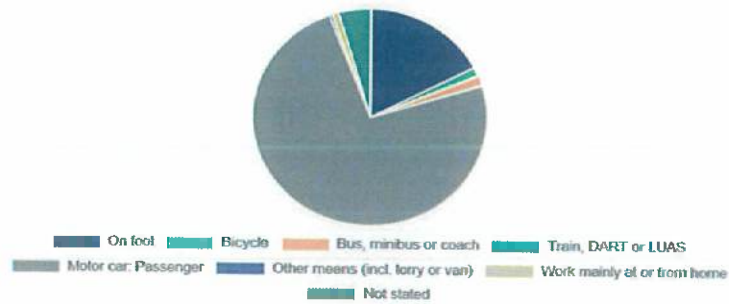
The proposals foresee the insertion of cycle lanes along both sides of Rathfarnham Road and for one to take a right turn along Bushy Park Road. On the matter, I have a few observations to make and data to share that is publicly available at [www.cso.ie](http://www.cso.ie).

The latest census provides an insight into how and when people travel to their place of work, school, college and childcare.

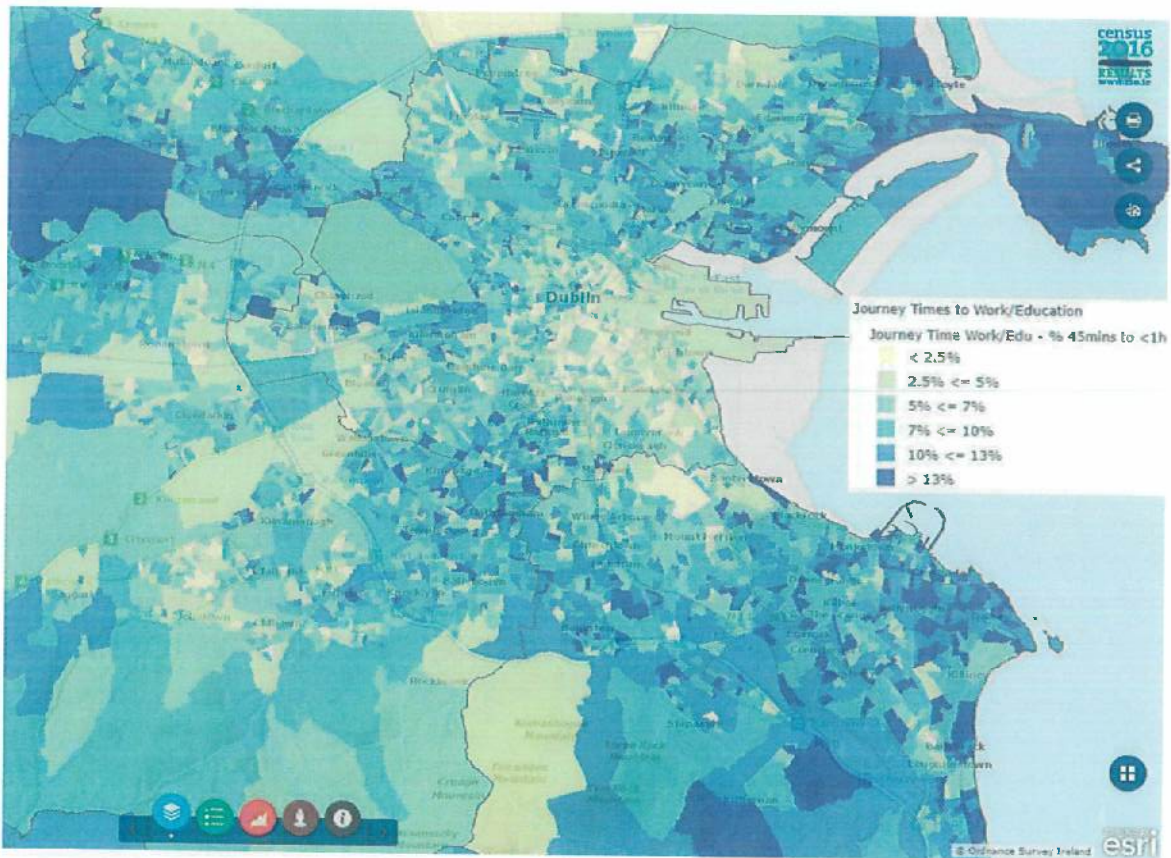
- The number of people who drove to work increased by 4% to 1.2 million between 2016 and 2022.
- There were 4% fewer people commuting to work by train, LUAS or DART.
- A big increase was recorded in the number of people who work mainly at or from home, up 173% to nearly 260,000.
- Fewer third level students commuted to their place of education on foot or by *bike*, but more used public transport and cars.
- The dominant form of transport for school children remained the car with 55% of primary school and 42% of secondary school children being driven or driving to school.
- In 2022, there were 88% more primary school children commuting by bicycle than in 2016, and the number of students aged 13 to 18 cycling to school was up 79%.
- The number of commuters leaving before 6:30am went up 23% between 2016 and 2022, and the number leaving between 6:30 and 7am increased by 47%.
- Fewer commuters left home between 9 and 9:30am to go to work; down by over 50% compared with 2016.
- In 2022, the average commuting time was just over 29 minutes.

The pie-chart overleaf and the map extracted from the AIRO website, highlights some important information. If one examines south-west Dublin, people are spending less time commuting compared to people in the inner suburbs of Terenure, Rathfarnham. That would seem to suggest that people from south-west are not necessarily commuting to the City Centre for work purposes to the extent as the NTA suggests. This calls into question, the basis for aspects of Bus Connects along both routes.

**Figure 5.20 Children aged 0 to 4 years at school or childcare by means of travel, 2022**



© Central Statistics Office, Ireland  
<https://data.cso.ie/table/FY079>



One issue that has dismayed many people is the planned removal of the 15B service. The existing 15B serves several schools along Bushy Park Road (High School, Stratford, Zion National School). Route 12 Rathfarnham to City Centre will not pass any of these schools. This will encourage more parents to drive their children to school instead. Alternatively, children will be forced to walk from the Scouts Den on Rathfarnham Road all the way down Bushy Park Road.

Commuters from Rathfarnham, Terenure have long requested an enhanced service to the Airport, under each phase of the Bus Connection consultation process. The exiting 16 route takes 90 minutes from Rathfarnham alone. These requests have not been taken on board in the final Bus Connects plans submitted to An Bord Pleanála. All that will happen, is that

number of the Route will change and each bus stop will still be serviced. People have repeatedly asked for an Express Service to the Airport that would only service particular bus stops en route.

The new cycle lane built along the Lower Dodder Road in Rathfarnham have *not led* to any sudden surge in people cycling along there. I suspect the installation of new cycle lanes both sides of Rathfarnham Road will not either. The installation of a camera along the bus lane along the Rathfarnham Road would allow cyclists use it safely.

### **Bus Gate Locations**

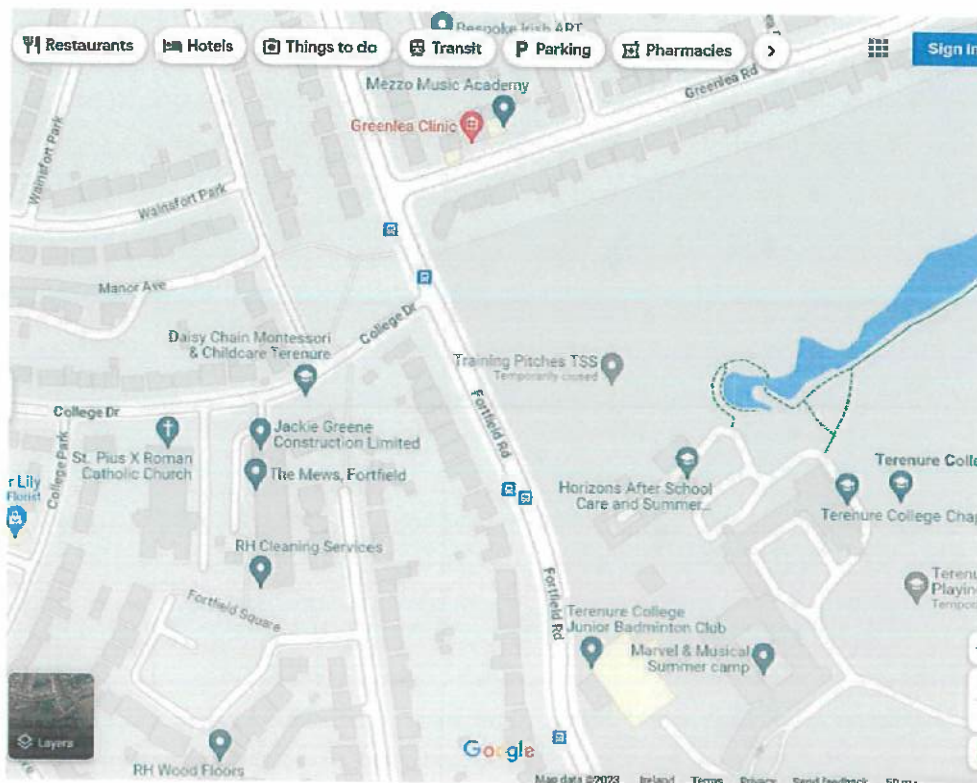
*Proposal: Templeogue Road at Olney Grove (6am -8pm). No general traffic inbound beyond Olney.*

There are certain times of the day (7-11am 4-7pm) when traffic curtailments could occur through the use of bollards. Census data shows peak traffic hours are in the morning and late afternoon. However, either side of these, traffic must be allowed travel up and down Templeogue Road to enable residents get to their houses and drop children to games or drive in their car to the park and bring a dog for a walk around it. At weekends also, the number of people travelling to work diminishes significantly. There is no reason why Templeogue Road can't be open throughout weekends.

Bus Connects proposes to divert traffic from Templeogue Road (opposite Our Lady's School) down Fortfield Road. This road is the dividing line between Dublin City and South Dublin County Council. Bus Connects also proposes to prevent traffic turning right from Fortfield Road into Laverna and Greenlea Road. The later has several public and private services including a doctor's practice, Music School, Pharmacy, Post Office and a Scout Den. This proposal is unacceptable to residents who live in the surrounding estates.

54A bus comes down Fortfield Drive and turns left onto Fortfield Road. It will be exceedingly difficult for this bus to get onto Fortfield Road with the increased volume of traffic. There is an entrance to Terenure College at this point, where children are dropped to school by a guardian. In addition, since the last set of Bus Connect proposals were drafted, a developer has submitted proposals to ABP to build several hundred new houses on rugby pitches owned by Terenure College. See map for more details.





***St Mary's School on Rathmines Road Lower (6am-8pm)). No through inbound or out***

There are people in the likes of Rathmines who own a house. How are they meant to get to their properties if the road is closed off 14-day light hours. There is no justification for this very lengthy time period. Again, it could be reduced from 7-10am and 4-7pm to accommodate all users of the road.

***Terenure Village right turn to Terenure Road East (TNE)***

The 15B that goes along Bushy Park Road is currently the fastest route to the City Centre from Rathfarnham and beyond. Having all these additional buses going along Rathfarnham Road turning right onto TNE is going to block up Terenure Village altogether. Emergency services such as ambulances and fire brigades might be compromised heading in the direction of Saint James Hospital along Terenure Road North.

***Rathgar Road to become one way inbound to the City Centre.***

*Outbound general traffic to go via Upper Rathmines Rd/Highfield Road or Grosvenor Road/Kenilworth/Rathgar Ave or Leinster Road, Harolds Cross etc.*

Making Rathgar Road a one way is unacceptable as there are thousands of people who live in estates, houses and apartment complexes both sides of Rathgar Road. If this proposal goes ahead, it will lead to 'rat runs' all along adjoining areas. This will result in more air pollution occurring. Cars will use more petrol getting to their final destination that if they were traveling direct down Rathgar Road.

## **Right/Left turn bans/changes.**

*No left turn onto Templeogue Road from Olney during bus gate operation.  
No right turn onto Templeogue Road from Fergus Road during bus gate operation.  
No right turn from Templeogue Road into Rathdown Avenue and Rathdown Park.  
No right turn from Greenmount Road onto Terenure Road East.*

*Introduction of right-hand turn from Rathfarnham Road into Terenure Road East – bus/taxi/cycle only*

## **Bus lanes**

*Templeogue Road – outbound only to Bushy Park, then in both directions to Templeogue Village.*

*Terenure Road East - both inbound and outbound*

*Rathfarnham Road - both inbound and outbound*

In relation, the series of proposed right/left turn bans above and making Templeogue Road a bus lane outward to Bushy Park plus making Terenure Road East - both inbound and outbound bus only has angered people. This will trap people into their estates many of whom are elderly and rely on using their car. People are not going to abandon their cars and embrace public transport as the NTA would hope. One of the problems with Bus Connects is that it is too City Centre focused. There are no new orbital routes proposed around Rathfarnham/Terenure. In fact, people will have to jump off buses to get another bus to get places that are currently directly serviced by existing routes.

Finally, the world has changed significantly since the NTA proposals were compiled pre Covid-19. Ireland now has the highest percentages of people working from home in the EU. According to EUROSTAT, *"Ireland is leading the charge in terms of how rapidly remote working is taking the place of traditional office-based work, according to analysis of Eurostat data by BNP Paribas Real Estate. Netherlands has the highest percentage of its workforce engaged in remote working (over 50%), while Ireland is adopting remote working at the fastest rate of any other EU country. In 2019, just 7% of Ireland's workforce said they "usually" work from home – this figure soared to 25% in 2022, the biggest percentage point increase of any EU country".* [RTE 8/8/2023] A new Remote Working from Home piece of legislation was passed by the government in April.

An Bord Pleanála has to weigh up the various interests of different stakeholders. I would urge it to consider that Rathfarnham, Rathgar and Rathfarnham are vibrant communities and not commuter belts. They contain more elderly people than outer suburbs as well as having many more public and private services. In order to keep those services viable, cars will also have to be able to use the public highway outside core commuting times (7-10am and 4-7pm).

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