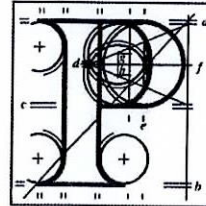


Our Case Number: ABP-316272-23
Planning Authority Reference Number:



**An
Bord
Pleanála**

Councillor Anne Feeney
Members Room, City Hall
Dame Street
Dublin 2

Date: 17 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.

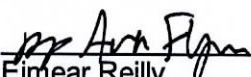
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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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OBSERVATION TO AN BORD PLEANÁLA

RE: BUS CONNECTS BUS CORRIDOR TEMPLEOGUE/RATHFARNHAM TO CITY CENTRE

APPLICATION: 316272

From: Councillor Anne Feeney
Members Room, City Hall, Dame Street, Dublin 2
Anne.feeney@dublincity.ie

I am a Dublin City Councillor for the Kimmage Rathmines Local Electoral Area which is impacted by both the Templeogue/Rathfarnham to City Centre Bus Corridor and the Kimmage to City Centre Bus Corridor. I am making this submission both as a public representative and also in my own capacity as a local resident of Terenure.

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

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 Bus Corridor application** which has also recently been lodged. Both of these applications have implications for local residential areas, cyclists, traffic flows, air quality and environmental impact.

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

- **Best practice design hierarchy** principles for transport and active travel strategies
 - o **Pedestrians** – safe for walking and access to frequent public transport
 - o **Cyclists** – continuous safe cycling lanes; most direct routes
 - o **Public Transport** – frequent services; adequate capacity; accessible for all
 - o Private cars/vehicles – low emissions and secondary to other transport options
- **Dublin City Council's development plan** and emphasis on development of urban villages
- **Submissions from local residents, resident associations, community groups, businesses and other relevant stakeholders.**
- **NTA's very limited projection for increased number of buses** for future demand.
- **Frequency and accessibility to buses/public transport** should be key rather than speed to destination (NTA's own admission is for modest time saving on this Bus Corridor).
- **Volume of HGVs and cars diverted onto narrow residential side roads due to Bus Gates** needs to be critically analysed in terms of environmental impact and congestion.
- **Capacity for An Garda Síochána to enforce banned turns**

General Observations:

I fully appreciate the need for a greatly improved 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 developments. 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-stakeholder approach to urban planning, particularly when there will be:

- **No appreciable increase in buses on the route** (buses are currently and will continue to be full to commuters, before reaching the Terenure, Rathgar, Rathmines areas).
- **No significant reduction in time from start to city centre**
- **Insufficient design for continuous safe cycling route**
- **Significant negative impact for residential roads** by placing Bus Gates on main arterial routes to the city centre. **Dublin City Council traffic officials have confirmed to me that the current Priority Bus Traffic lights on Templeogue Road and at the three other locations in the city work very effectively in terms of ease of flow for buses.** No clear up to date data of combined traffic impact (different times of day) for residential roads that have to absorb traffic as a result of the proposed Bus Gates.
- **Significant cost of compulsory purchase orders** to properties on the corridor
- Significant construction cost and **cost to businesses in the villages** of Terenure, Rathgar and Rathmines.
- **Felling of trees where it is not necessary** for cycling routes (i.e. Bushy Park and Rathdown Drive median). Safe cycling already in both of these areas.

Specific Observations for locations 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 for vehicles, 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 and Stannaway Road or right onto Terenure Road West for city centre. In addition to the diverted traffic, access for local residents to their own roads and homes will be impacted by increased congestion on these roads and other adjacent side roads. Access to and from Terenure Garda Station (Terenure Road West) for patrol cars may be potentially adversely affected.

- 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 Taxi rank in Terenure College for duration of construction Bus Corridors.
 - o Sharp right hand turn for buses at Terenure village junction (from Rathfarnham road to Terenure Road East). Dangerous junction currently with reported pedestrian accidents.
 - o Taxis (as well as buses) will be able to turn right onto Terenure Road East
 - o Traffic light sequencing impact for Terenure Road West and other converging roads. Current sequencing (without diverted traffic) results in lengthy back logs on Terenure Road West off peak as well as at 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 loading bay to close
- Roads that will get extra traffic – Highfield road as a result of Bus Gate on Rathgar 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. Local residents and Church will be severely impacted by road closed to private vehicles.
- Mountpleasant Ave. cut in two at Bessborough (areas to the north can only be accessed from 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

- Road Closure – Kenilworth Road at busy five way junction will be closed outbound.
- Roads that will get extra traffic – Terenure Road North
- Cycle Lanes – continuous from Terenure Village to Harold's Cross Park both ways
- Bus service frequency to decrease significantly on Terenure Road North and Harold's Cross Road. Significant number of new apartment developments as well as houses on this route

Kimmage

- Bus Gate at Lower Kimmage Road (Ravensdale Park junction) and at Mount Jerome
- Some of the roads that will get extra traffic Clareville Road, Larkfield Ave, Larkfield Park, Sundrive Road, Stannaway Road.

Conclusion:

In conclusion, Bus Corridors with no appreciable improvement in bus numbers are an over engineered and costly approach for the Templeogue/Rathfarnham routes. 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; 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 along the routes. 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 and Lower Kimmage Road and Rathmines Road Lower are unnecessary given that Dublin City Council's 'Priority Traffic Lights' are a proven solution to ease flow of buses on narrow urban roads and have a much less adverse impact on adjacent residential roads.

What is needed right now are more buses, more priority bus lights, more continuous and segregated cycling and more pedestrian oriented traffic light junctions.

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 (on wider arterial routes), 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 and this needs to be our planning vision.

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

Kimmage Rathmines LEA

Dublin City Council