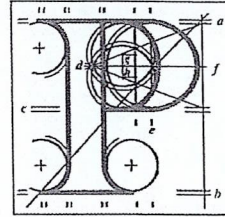


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Danny & Margaret McLaughlin
1 Victoria Rd
Rathgar
Dublin 6
D06P266

Date: 22 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.

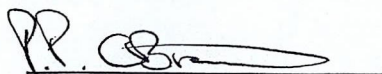
If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Yours faithfully,



Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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Bus Connects Submission to An Bord Pleanála in respect of the Templeogue/Rathfarnham to City Centre Core Bus Corridor

Bord Pleanála Case Reference: HA29N.316272
From Danny and Margaret McLaughlin

Home Address: 1 Victoria Rd, Rathgar Dublin D06P266

Email: [REDACTED]

Tel: [REDACTED]

We are making observations mostly about the areas if this corridor which affect us in Dublin 6 and surrounding areas. We are local residents and have lived on Victoria Road for 30 years.

Aim of the scheme

*The aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver **efficient, safe, and integrated sustainable transport movement along the corridor.** The Proposed Scheme is a key measure that delivers on commitments within the National Development Plan (2021-2030), the Transport Strategy for the Greater Dublin Area (2022-2042) the Climate Action Plan (2023) and the National Planning Framework 2040¹*

The key measures therefore are: efficiency, safety, integration, sustainability.

However our view is that the cost, reduction in quality of life, health and welling being of residents affected in the corridor plus and environmental impact are much greater than proposed improvements.

With regard to environmental impact, a report is not yet available but looking at the scope of the one for Kimmage it is confined to technical aspects rather than overall impact on peoples lives. It focuses on traffic, not people and suggests that the corridor into Dublin city is an end to itself. Since Covid we have seen a dramatic change in people work practises and many offices in Dublin are vacant. Public offices including local authorities are themselves not used except on a once or twice weekly basis by workers. The application does not adequately take into account the impact on Templeogue, Terenure,

¹ [Home - BusConnects Dublin - Templeogue/Rathfarnham to City Centre \(templougherathfarnhamscheme.ie\)](https://www.templougherathfarnhamscheme.ie)
cover page

Rathgar and Rathmines villages and people who live, work and shop nearby. These need to be protected as the fabric of the city will deteriorate.

Tree removals will take place which will affect local communities and – at Rathfarnham Castle Park, Rathfarnham Road, possibly on Templeogue Road and at Rathgar Road.

The NTA, by their own admission state that the roads surrounding the main corridor will have increased volumes of traffic (albeit it is contended that their own figures are flawed) for example (all cited as pm peak times unless otherwise stated): This will mean much increased traffic on smaller roads and reduced quality of life for communities.

Rathgar Road outbound will be a prohibited route outbound, so approx. 10,000 vehicles that use this route will have to find a different route, as will approx. 500 lorries.

Kenilworth Road will be a prohibited route at the five way junction, the cars that use this route will have to find a different route as will the lorries. No data is available on this.

Highfield Road is already very narrow and likely to get increased traffic including the lorries, as it seems to be the likely preferred option for accessing Rathgar from Rathmines. This will make it dangerous for many pedestrians in the locality including those accessing St Lukes Hospital.

Extra vehicles passing through a residential area impacts on residents trying to access and exit their homes. It will lead to increases in stationary traffic due to sheer volumes, all affecting the environment and air pollution.

Not all traffic is into town, there are many people travelling in several directions and this is not taken into account e.g CityWest, Ballymount, Robin Hood Industrial Estate, TUD Dublin, Tallaght.

The environmental cost of air pollution must be factored into this equation and there is guaranteed to be an increase in same, thereby defeating the macro reasoning behind these schemes in the first place. The sustainability reasoning simply doesn't exist.

Environmental Impact Assessments should be obliged to consider the accumulative effect of all of the bus corridors, not merely each one in a silo, that is neither accurate nor reasonable.

Cycling

The segregated cycling tracks are not continuous along the CBC routes. There are sections of road where segregated cycling lanes cease altogether in order to prioritise bus lanes. This is a very significant flaw that prioritises the minutes shaved off bus journey times (a theorised objective that only impacts during peak traffic travel times, if at all) over the safety of cyclists who are obliged to road share without segregation for significant sections of the road on a 24/7 basis. The balance is completely wrong to prioritise bus routes where the demand fluctuates over cycling where the need is 24/7. There are attendant roads that will have no cycling infrastructure at all, for example, there will be no cycle lanes on Terenure Road East. Cyclists will use the bus lane as far as St Joseph's and then be forced to use the general road, see maps 6 and 7 in the General Arrangement for proof.

1. Also of concern is the fact that considerable advertising monies are spent on ensuring that cars leave adequate room for cyclists when passing them out, and rightly so. This becomes a

non-issue when you have continuous segregated cycling lanes and lends itself to the fact the urban traffic is going to travel in closer proximity to cyclists, hence the need for segregated cycling as a safe area for cyclists who are the more vulnerable road users. However, the width of cycling lanes as set out in the National Cycling Manual, should be 2 meters to accommodate the space for the cyclist themselves, wobble room, the space to the left of a cyclist that must accommodate gullies and drains and the space to the right of the cyclist that will come into the proximity of other road users. This minimum of 2 meters is not reached throughout whole sections of the proposed cycle tracks. This means that cyclists are obliged to travel less than the recommended space on the road alongside traffic that can quite often be less than mindful of their needs.

“... Bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor”

A key issue with this statement of the NTA objective is that while it may well deliver bus infrastructure along the corridor, the reality of which is disputable, and perhaps it delivers integrated sustainable transport movement along the corridor, it does so at a significant cost to all other transport movement in the peripheral road network surrounding the corridor and other transport options such as metro etc which should be explored for medium longer terms plus options such as congestion charges.

There is a huge need for sustainable public transport and we agree that an enormous level of change is needed to achieve it, this application should be about whether this is the right change or the best change to make in order to achieve that objective.

The area of this corridor is the one that will provide the A spine. However, this must be viewed in the context of the F and D spine also. Roads along which the A and F spines will run in the areas within the oval shape will be effectively be closed to all other traffic between 6am and 8pm seven days per week by the bus gate. A substantial number of residents within that area will require access and egress but will be denied the right hand turns into alternative routes leaving some narrow residential streets as rat runs to cut across the closed roads and work around them.

There is a heavy concentration of bus corridors influencing a small area outside of the city centre, this is unusual across the entirety of the network and creates a disproportionate burden on the communities living there.

Flawed Public Consultations

Maybe COVID is the reason but public consultation has been woefully inadequate. Most people struggled to understand the changes and Implications for them and the wider community.

Ordinary citizens are expected to unpack and piece together implications of these changes in order to render themselves able to envisage the impact on their lives and comment on it. It is a completely unsatisfactory and unfit for purpose means of providing for the input of the public.

It is clear that the design of the Bus connect has been mainly an engineering / technical exercise without input by city designers, architects and community representatives to ensure buy in and

support from various sectors. The bus corridors were set out as vertical roadways into city without considering the human factors and behaviours.

Residents Associations were met on a one to one basis, never as a collective. Consequently, arrangements are included that favour one residents group at the cost of others. Again this cannot possibly constitute adequate stakeholder consultation. The NTA has left themselves open to a challenge under the Aarhus Convention for a failure to properly engage in public consultation.

Greater gain to the community by way of Bus corridor

Changes in the way we live our lives are necessary if we are to properly play our part in climate change, But the changes must respect their investment into communities, into the shared living spaces of villages, public parks and shopping patterns. We cannot bully through bus routes to effect climate change while causing traffic chaos that will increase air pollution, reduce footfall to businesses and inadequately deal with the need to provide complete cycling infrastructure. We must have consistency in decision making – we cannot rob Peter to pay Paul and this plan appears to do that.

We urge you to either send the NTA/Bus Connects back to the drawing board for alternatives and proper environmental impacts and consultation, for complete cycling infrastructure and for quality of life or make the detailed changes that are needed to make this viable.