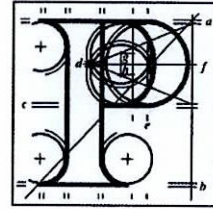


Our Case Number: ABP-316272-23
Planning Authority Reference Number:



**An
Bord
Pleanála**

Darren Twyford
64a Terenure Road East
Dublin 6
D06 V567

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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Glaó Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Darren Twyford
64a Terenure Road East
Dublin 6
D06 V567

Re: Submission Regarding the NTA Application for Planning Permission to Widen Terenure Road East.

I am a resident at the above address and this is my submission in relation to the proposal to widen Terenure Road East (TRE) as part of the bus-connects scheme to accommodate two bus lanes and two car lanes for a substantial section of this route. This submission will be brief and will illustrate my objections to the proposed relevant plans in a bullet point format.

General Points of Observation:

- The proposal to widen a substantial section of Terenure Road seems to be based on potentially outdated data as the plan is founded on a pre-Covid landscape and, as yet, does not factor in the likely long term effects the pandemic may have had on traffic modeling.
- The proposal involves a mere circumvention of recent traffic congestion issues and it is, at most, anticipatory as a solution to traffic problems. It follows that the bus corridors will allow the buses to make way for car traffic on TRE with no guarantee of enticing drivers from their cars. For instance, a lot of the traffic at certain times is caused by school runs, buses will not remedy this, they will only by-pass it.
- The proposal includes the felling of nineteen trees along this part of the route, which, in an era of eco awareness, is, at the very least, bad practice and insensitive to the national and global cause of combating urgent environmental issues, and at worst is environmentally negligent.
- The felling of trees (especially mature trees) will also have a lasting detrimental effect on the character and living heritage of Terenure and Rathgar which will diminish the atmosphere of the area and will likely strip the historic route of its essence and charm.
- The felling of trees is likely to have an adverse effect on the urban wildlife in the area.
- The felling of trees will likely undermine the amenity derived from the trees by many people and families who regularly use the route for recreational walking, jogging and cycling.

- The planting of new trees is not a reasonable consolation because young trees will take many decades, if not generations, to reach the maturity of some of the existing trees.

- The widening of roads has, in the past, destroyed heritage townscapes around Dublin, or has been the death knell for struggling communities. For example, the Cork Street and Clanbrassil Street areas. Road widening is a regressive and short sighted solution to traffic congestion and public transport issues. It does not address the root of the issues adequately, if at all.

- The proposal envisages more bus corridors allowing for more frequent and faster bus transportation on this route. This will make it a less safe environment for pedestrians and cyclists alike. Particularly so for more vulnerable users of the street. In terms of a user-friendly and safe environment for all pedestrians and cyclists, young and old, this is a retrograde measure.

- Rerouting cyclists away from TRE onto back roads may not have the desired effect. Many cyclists will still use the quickest and most direct route into the city. It may require regulation and policing to prevent cyclists from using bus corridors. But as we know from current policy, forcing cyclists to rigidly stick to the rules of the road may be deemed heavy handed and may have the effect of discouraging bicycle usage. Therefore, in consideration of current practise, cyclists are likely to use the corridors where no cycle lanes are provided.

- The proposal pits the well-being of commuters against the well-being of many members of the community in Terenure and Rathgar to the detriment of the latter. It is based on a utilitarian 'the ends justify the means' mindset which involves a forced and unjust sacrifice of a large aspect of a community's amenity to accommodate bus flow. In time this policy will be perceived as disproportionate and flawed because it prioritises a transient group over a settled community.

- The proposed road-widening will cause many of the protected historic cast and wrought iron gates, railings and old brick/granite walls to be damaged or even destroyed. Anything less than the careful and skilled reinstatement of this historic work would be vandalism. The NTA seem to be silent on this aspect of their proposal.

- Other proposed routes on the bus-connects scheme have conceded to a position of deprioritising car traffic offering one-way traffic solutions, this has not been applied to the proposal for TRE, which unfairly sacrifices much of the amenity of the area in order to accommodate car traffic both ways as part of the plan.

- The consultation process was not halted during the pandemic, much of the process moved online in response to social limitations and 'lock-downs'. As a result, many members of the community were unfairly and unreasonably excluded from the process because they were unable to access modern online forums and were not accommodated at a later date. These people may well be the most affected by the proposed alterations to their neighbourhood; this effective exclusion has left them devoid of a platform to express their concerns. The process was not sensitive to the right to be heard of a certain portion of the community.

Conclusion:

Traffic congestion will persist without holistic solutions that span many societal concerns. Concerns such as the lack of affordable city housing or increasing private car usage. Meanwhile, communities will be made to make way for infrastructural developments designed to react to the constantly increasing needs of a growing commuting population. A wider inter-departmental approach to traffic congestion and transportation is required. One policy failure affects the other. It is remiss to alter, and transform our urban villages into thoroughfares on account of failed policies in other important areas that have an effect on traffic.