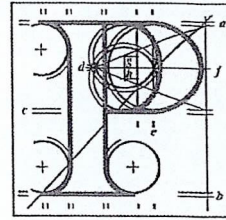


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Elaine J. Wright  
311 Bushy Park House  
Templeogue Road  
Terenure  
Dublin 6W

**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](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

**Submission to An Bord Pleanála in respect of the BusConnects -  
Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme (ABP – 316272-  
23)**

Submitted by: Elaine J. Wright

Home address: 311 Bushy Park House, Templeogue Road, Terenure, Dublin 6W

Tel: [REDACTED] and [REDACTED]

email: [REDACTED]

**This submission focuses on the area around Bushy Park and the impact specific aspects of the proposed Scheme will have on pedestrians and regular bus users.**

I would like to point out that I am not against such a Scheme per se, but that it is clear that this particular Scheme, as currently proposed, has not been subject to the detailed scrutiny such a plan requires and deserves, especially in light of the tremendous expense of implementing it and the disruption to the city's citizens and its infrastructure during the course of its implementation. (Although not otherwise referred to here, in this submission, both the projected cost and time span for the implementation of the Scheme are widely unrealistic, especially in light of other recent and ongoing building projects.)

My overall concern is that the Scheme has not adequately taken into account:

- the city's aging population, the physically disabled of any age and other vulnerable groups
- families, especially those with very young children but with children of any age
- the importance of the city's rich historical and architectural heritage (and its value to the tourism industry)
- the impact of the natural (green) environment on the physical and mental health and overall well-being of the city's residents
- the role of the natural (green) environment in the reduction of carbon dioxide levels in the atmosphere and thus in combatting climate change; instead, the focus is 'merely' on the reduction of carbon emissions

**Bus stops and travelling by bus**

The aim of the Scheme is to encourage people to travel by bus instead of by car, but there are instead several aspects of the Scheme that will surely fail miserably in this respect; others, even more surprisingly, seem designed to achieve the opposite: namely, to 'drive' established bus users into their cars.

**1. Reduced bus journey times is intended as one of main incentives to get people to move from their cars to buses.** Yet, the stated reduction in journey times are minimal. As any regular bus user knows, journey times can vary greatly depending on the time of day and even at the same time of day. Dublin traffic is bizarrely unpredictable, and the impact it has on journey times for bus users is therefore equally unpredictable. The underlying premise of proposed BusConnect Scheme is that by rerouting private cars and lorries off bus routes, buses can travel more easily and quickly to and from the city centre. However, the estimated



reduction in bus journey times (see section 6.4.6.1.11.2, p. 124, of the Scheme, onwards) is inconsequential. In fact, it is almost comical that anyone would think such tiny increases could be an incentive to travel by bus, especially to those existing bus users who know how greatly journey times can vary now.

For example, on p. 125, the Scheme states: ‘Based on the results presented in Table 6.48 the Proposed Scheme will deliver average inbound journey time savings for A3 service bus passengers of **up to 1.6 minutes** (14%) in 2028 (AM) and 0.7 minutes (7%) in 2043 (AM).’

How can such tiny decreases possibly be an incentive to travel by bus, especially in light of other aspects of the Scheme?

**2. In certain cases existing bus stops are being removed or simply relocated**, the aim being, it is said, to lessen the number of times a bus must stop and therefore decrease overall journey times. However, as shown, the decreases in journey times are inconsequential. But, also, as with so many aspects of this Scheme, it seems that the elderly and less physically able have not been considered. It would seem that more, not fewer, bus stops would be an incentive to using the bus. In one case, there is currently an inbound stop in Templeogue village (stop no. 1157), one more or less halfway between Springfield Road and Fortfield Road (no. 1158) and then one in front of Terenure College and opposite Bushy Park House (no. 1159). In the Scheme, this latter stop is to be moved to the western side of Fortfield Road, with the Springfield Road stop (no. 1158) removed completely. (See Vol. 1, General Arrangement Drawings, sheet 33 for stop 1157 and sheet 34 for the existing and proposed location of stops 1158 and 1159.) Whatever the placement of the current stop 1159, the distance between it and stop 1157 is considerable, especially considering that there is a major intersection (across Springfield Road), which pedestrians must cross in two stages (with two separate lights), thus greatly increasing the overall journey time for anyone who now uses the stop in between, no. 1158. Especially, but not only, for anyone with any mobility problems, such a reduction in the number of bus stops could well provide the incentive to drive oneself, instead of taking the bus—or it might make it mandatory that one do so.

**3. Worryingly, throughout the Scheme, it seems that proposed changes have been made in isolation, without taking into consideration aspects of the surrounding environment relevant to the proposed change.** It is clear, throughout, that the individuals who drew up the Scheme are not familiar with the areas for which they are proposing drastic changes, but that, instead, the Scheme has been drawn up by individuals working only off of maps, not the experience of living in the areas affected or even of travelling by bus themselves. Besides the issue with bus stops 1157, 1158 and 1159 referred to above, this is also obvious in terms of the proposed move of bus stop 1159, a heavily used stop by Terenure College and opposite Bushy Park House. The proposed move of the stop to the west side of Fortfield Road seems, on paper, to be a good one, as the stop would then be closer to the existing crosswalk (though immediately before a set of traffic lights), but in fact the placement of a stop there is basically impossible as the footpath there is extremely narrow, and having a row of people waiting for the bus would force any passing pedestrian onto the busy road in order to get around them. If the Scheme planners had taken the time actually to visit the site, this would have been immediately apparent.

**4. Convenience and comfort** are the two things that most bus users want, including—and along with:

- a conveniently nearby bus stop



- a seat on the bus
- a bus that is cool in summer and warm in winter with good ventilation
- a reasonably priced journey
- a fast journey
- a friendly driver who knows how to stop and start smoothly without jerks that throw everyone about
- a nice view out the window, whether it be beautiful trees in the suburbs or interesting buildings and other structures in the city centre

### **Cyclists and Pedestrians**

Section 6.4.6.1.2.2, Cycling Assessment, states: ‘Along Section 1, the Proposed Scheme will provide a **60mm set down kerb segregation between the footway and the cycle track**.

This is of particular importance in the context of providing for pedestrians with visual impairments, whereby the use of white line segregation (as is the case in some areas of the baseline environment) is not as effective for establishing a clear understanding of the change of pavement use and potential for cyclist/pedestrian interactions. In addition, a full height 120mm upstand kerb between the carriageway and the cycle track is provided as part of the Proposed Scheme (120mm kerb height on the bus lane side and 60mm minimum kerb height on the cycle track side).’

However, although the section I have highlighted is a welcome statement, it is, nevertheless, worrisome. Throughout the Scheme, there is repeated reference to the physical segregation of cyclists and motorists for the safety of the cyclists when the cycle path is part of the road. However, segregation of cyclists and pedestrians, when sharing the same path, seems not to be as vital a concern. There is, for example, no such general comment (as above) included in the preceding section (6.4.6.1.2.1) on Pedestrian Infrastructure, and, indeed, throughout the Scheme cyclists seem clearly to be prioritised over pedestrians.

It is, for example, noted in Section 6.4.6.1.2.2, that there is intended to be ‘Segregation of cyclists and pedestrians adjacent to the Templeogue Arch; currently operating as a shared space’, yet no such comment is included for other areas, such as the footpath through Bushy Park along the edge of Templeogue Road. Wherever pedestrians are expected to share a space with cyclists, the pedestrians are in danger, and the Scheme does not seem to take this into account, or, at least, not as thoroughly as it should.

In order for there to be increased cycle use within the city, there needs to be more vigilant enforcement of bylaws governing cyclists—and these need to be enforced both on roads and on shared footpaths. Although I appreciate that doing so does not fall under the jurisdiction of the National Transport Authority, the Scheme must in some way work to ensure this and thereby to reassure pedestrians. Specifically, it is extremely dangerous for pedestrians, even in areas where the shared space is relatively wide, such as the footpath in Bushy Park. Cyclists suddenly ‘appear’ behind you, with no warning, and travelling at speed. Cyclists must have bells on their bikes (as they are now legally obliged to) and they must use them. There must also be improved lighting for most footpaths, but especially where the path is to be shared with cyclists. The path through Bushy Park, though lit by the lights from the adjacent road and its own lights, is still dark and therefore is especially dangerous being shared with cyclists at night. As part of the implementation of the Scheme, the NTA needs to mount a publicity campaign on the responsibilities of cyclists.



### **Trees**

The legend accompanying each of the various drawings in Vol. 1, General Arrangement Drawings (see, in particular, sheets 34-36) includes a green circular symbol identified as denoting ‘tree (existing and proposed)’. This is extremely ambiguous and might even be considered intentionally deceptive and devious. The potential destruction of mature trees is not a matter to be taken as lightly as the NTA seems to do. It does not make sense to willingly destroy trees, considering the current state of the earth and considering that we know the contribution that trees, especially mature ones, make to helping rid the atmosphere of unwanted levels of carbon dioxide.

Under the European Green Deal, the EU biodiversity strategy for 2030 commits to planting at least three billion additional trees in the EU by 2030. Although this is a pledge to plant ‘additional’ trees—and according to data supplied on the website [https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030/3-billion-trees\\_en](https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030/3-billion-trees_en), Ireland has planted more than 32,000 ‘additional’ trees since the adoption of the EU biodiversity strategy in May 2020—it is counter-intuitive to develop a Scheme intended to cut CO<sub>2</sub> emissions while at the same time destroying mature trees that are decades old—and in many cases surely more than a hundred years old—and which help to rid the atmosphere of CO<sub>2</sub>.

The replacement of mature trees with young trees, which are not capable of harvesting CO<sub>2</sub> to the much greater level of mature trees, is not acceptable and lessens the possibility of Ireland meeting its biodiversity targets. The NTA needs to be clear and open as to what is planned for the trees of every area covered by the Scheme. In fact, no trees, or at least no mature trees at all should be destroyed. There must be a means of achieving our goal of a cleaner atmosphere without doing so.

The Scheme also appears not to recognise at all the important contribution that green spaces make to the mental health of our citizens.

With regard to this, my particular concern are the trees in Bushy Park, along the edge of Templeogue Road, and the trees along Rathdown Drive. Bushy Park is heavily used by people of all ages and although it is large, the destruction of the trees of even a small portion of it should not be tolerated. As for the green area along Rathdown Drive, section 6.4.6.1.2.1 states that the ‘informal path on the green to the north of Rathdown Drive is to become a formalised footway’. This is welcome—as long as none of the trees are removed—but there is concern as to how this will be achieved, as the roots of most of the trees along the path are greatly exposed. Before any action is taken, more precise information than that available in the current version of the Scheme must be provided—and agreed to by the public.

The focus cannot be ‘merely’ on the reduction of carbon emissions with no regard for the (potential) damage done in achieving this.

### **The Built Heritage**

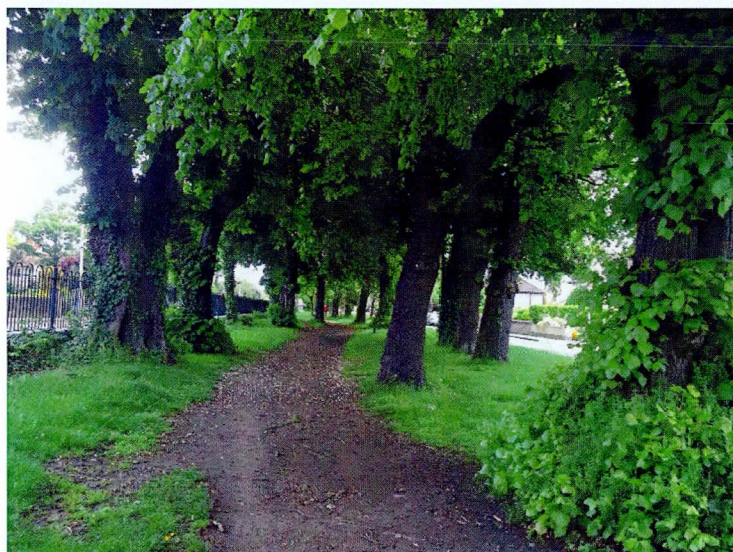
Much of what makes Dublin unique is its architectural heritage and other features of its built environment. Running along the Templeogue Road side of Bushy Park is a stone wall built in 1800. Sheet 35 of Vol. 1, General Arrangement Drawings, which shows this section of the park, includes a note stating that the area includes a number of ‘high value heritage lighting columns’ and ‘lengths of historic granite kerbs’. It states that the latter will be retained ‘where practicable if kerbs are not being adjusted’ and that ‘if kerbs are to be realigned [they will] be



reused where practicable.’ The repeated use of ‘if practicable’ is highly worrying and again seems intended to give the Scheme the leeway to do as it pleases. However, it is especially worrying that it makes no mention of the stone wall, merely the ‘high value’ lighting fixtures and the granite kerbs, seemingly making it clear that the wall (and the trees next to it) are considered to be of no consequence and therefore may well be destroyed. It is unacceptable that the historic structures of the city be treated so apparently flippantly. The wall must be retained.

Similarly, there is a section of stone wall along the green space of Rathdown Drive and set within it is a plaque (approximately opposite house no. 41; see sheet 35 of Vol. 1, General Arrangement Drawings), which states ‘Dublin City Council Stone Depot, built in 1800 to hold stones for the construction and maintenance of the then new road from Terenure to Templeogue’ (a photo of which is included below). This, too, is an important historical structure, though admittedly a modest one, and must be retained, though, again, there is no specific mention of it at all in the Scheme. (Again, this is probably because none of the individuals drawing up the Scheme ever bothered to visit the site and so have no knowledge whatsoever of it.)

It is seemingly unimportant structures such as these that make Dublin the great and intriguing city that it is—and I say this as relative newcomer to the city, having lived here only since 1998. Destroy such structures and the city’s wonderful trees and you destroy the city itself. It will be turned into simply ‘any old city’ with nothing to attract visitors from around the world—and with nothing to keep its own citizens here and to draw back those who have left.

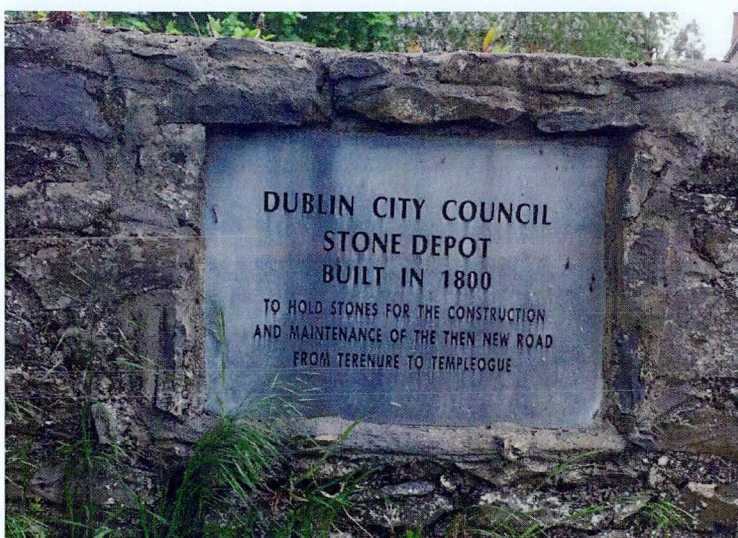


the foot path along Rathdown Drive that is to be ‘formalised’





the stone wall with plaque along Rathdown Drive



detail of the plaque set in the stone wall along Rathdown Drive