Our Case Number: ABP-316272-23

An Bord Pleanála

Fiona Reilly
1 Greenlea Grove
Terenure
Dublin 6W

Date: 18 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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA02A

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08 August 2023

Dear Board Members,

Re: Bord Pleanála Case reference: HA29N.316272 - Case:316272
Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

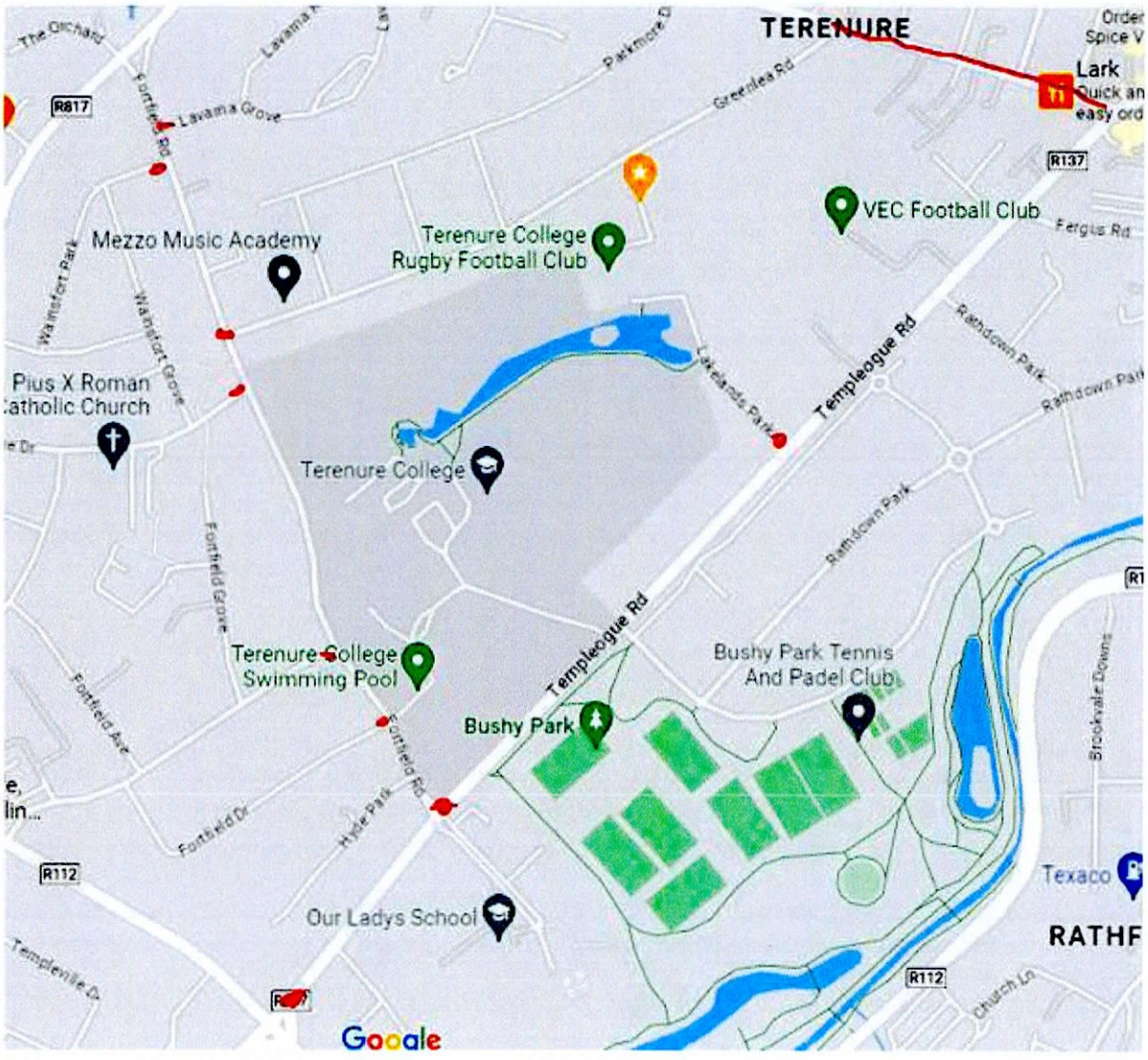
Myself and my young family are Residents living adjacent to the proposed Templeogue Bus Corridor scheme, we welcome and support proposals to move to more sustainable transport options to secure the environment for the future.

In relation to the application which has been put to the board for consideration I have concerns on the following matters which impact all Residents of the immediate area detailed in the map below, areas of particular concern are marked

- Traffic Modelling – Modal Shift
- Traffic counts and purported dissipation of traffic at Templeogue\Fortfield area
- Reduction in current Bus service on Templeogue Road
- Overlay of Orbital Routes
- Changes in Access to Community\Commercial concerns
- Environmental concerns
- Lack of Cost Benefit support for proposal
- Safety concerns
- Commercial Traffic
- Construction & Design of adjacent roads
- Emergency vehicle access

Yours sincerely,

Fiona Reilly



Traffic Modelling – Modal Shift

In trying to understand the data contained in the application I was unable to establish a % for Transport Mode shifts or an explanation of how that % can be derived, how can we determine what car use can readily switch within the area

- Elderly people who need to use private transport to get to medical appointments, household duties, carers to come to their homes
- Families with young children whom they need to transport to childcare, school with onward journey to place of work
- Families who need to transport children safely to activities outside of reasonable cycling distances e.g. matches in different locations in the city
- Commercial vehicles

Table 6.42: Modal Shift of 2028 AM Peak Hour along Proposed Scheme

Direction	Time Period	Mode of Transport	Do Minimum		Do Something		Difference	
			Hourly Trips	Modal Split (%)	Hourly Trips	Modal Split (%)	Hourly Trips	Difference (%)
Inbound towards the City Centre	AM Peak Period	General Traffic	470	28%	330	11%	-140	-30%
		Public Transport	950	56%	2,120	72%	1,170	123%
		Walking	170	10%	140	5%	-30	-18%
		Cycling	110	6%	360	12%	250	227%
		Combined Walking/Cycling	280	16%	500	17%	220	79%
		Sustainable Modes Total	**1,230**	**72%**	**2,620**	**89%**	**1,390**	**113%**
		Total (All modes)	**1,700**	**100%**	**2,950**	**100%**	**1,250**	**74%**

Without direction from the NTA team I relied on **Appendix C Mode Shift analysis methodology: Greater Dublin Area Transport Studies Dublin South West November 2021** and assume that an similar factor was applied under the planning application.

*This technical note explains the mode shift calculation used to inform the option development process for each area being considered as part of the Greater Dublin Area Transport Studies. The mode shift calculation is based on the Eastern Regional Model (ERM) and the **planning sheets provided by the NTA with the results** providing an indicative number of additional public transport trips which need to be catered for if a mode shift away from car is achieved.*

A factor is then applied to the car demand to create the mode shift away from car to one of the other modes. Two factors for mode shift have been applied in this study: 25% of car trips shift and 50% of car trips shift. This aims to provide a broad order of magnitude of demand to inform option development and assessment.

I ask the Board to request the planning sheets for the Templeogue\Fortfield and Fortfield\Greenlea Fortfield\Lavarna, Fortfield\College, Fortfield\Terenure Road West junctions and also ask the Board for detail of the Factor applied to understand how the items detailed in the bullets above are accommodated within the factor?

In the planning application - **Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report**

The basis of Junction changes are detailed

4.6.8 Junctions The design and modelling of junctions has been an iterative process to optimise the number of people (rather than vehicles) that can pass through each junction, with priority given to pedestrian, cycle and bus movements. The design for each junction within the Proposed Scheme was developed to meet the underlying objectives of the proposed Scheme

I am unclear as to how this modelling operates as clearly one cannot swap out 10 commercial vehicle movements (10 van drivers) for 10 additional passengers on a bus?

The results of the Modal Shift are detailed in 6.41 below. As a Resident of this area there is difficulty in understanding the results in the diagram which indicates that there will be a significant decrease of traffic on the Templeogue Road without any redirection on to Fortfield Road. There are right turn bans into Residential homes on Greenlea, Parkmore, Lavarna. From a practical perspectine for residents their journey into their homes will require a left turn left onto College Drive driving through a concrete road housing estate to exit onto Fortfield and come back up to make a left turn on to Greenlea @ .5 km more on each journey. For journeys to Terenure traffic diversion will likely end up on Terenure Road West which currently is a very busy road.

- A request was made to reproduce this Diagram of Road links under the scenario that the Proposal is introduced but that the modal shift is at a lower level.
- The NTA were asked to model some sample of journeys where mode shift is unlikely i.e. Family commute to school drop off and onward journey to work or an elderly Resident attending medical appointment in St James hospital.
- The NTA indicated that that there were no traffic counts taken of College Drive however there appears to be a junction count 10-22 so it is unclear how the Model cannot calculate based on Modal shift\assumptions of car journey types in relation to the 22,818 movements at Templeogue Road\Fortfield and No right turn at Greenlea is applied how there is no increase indicated on College Drive and this diversion to come back on to Fortfield to access Greenlea via turn is possible.

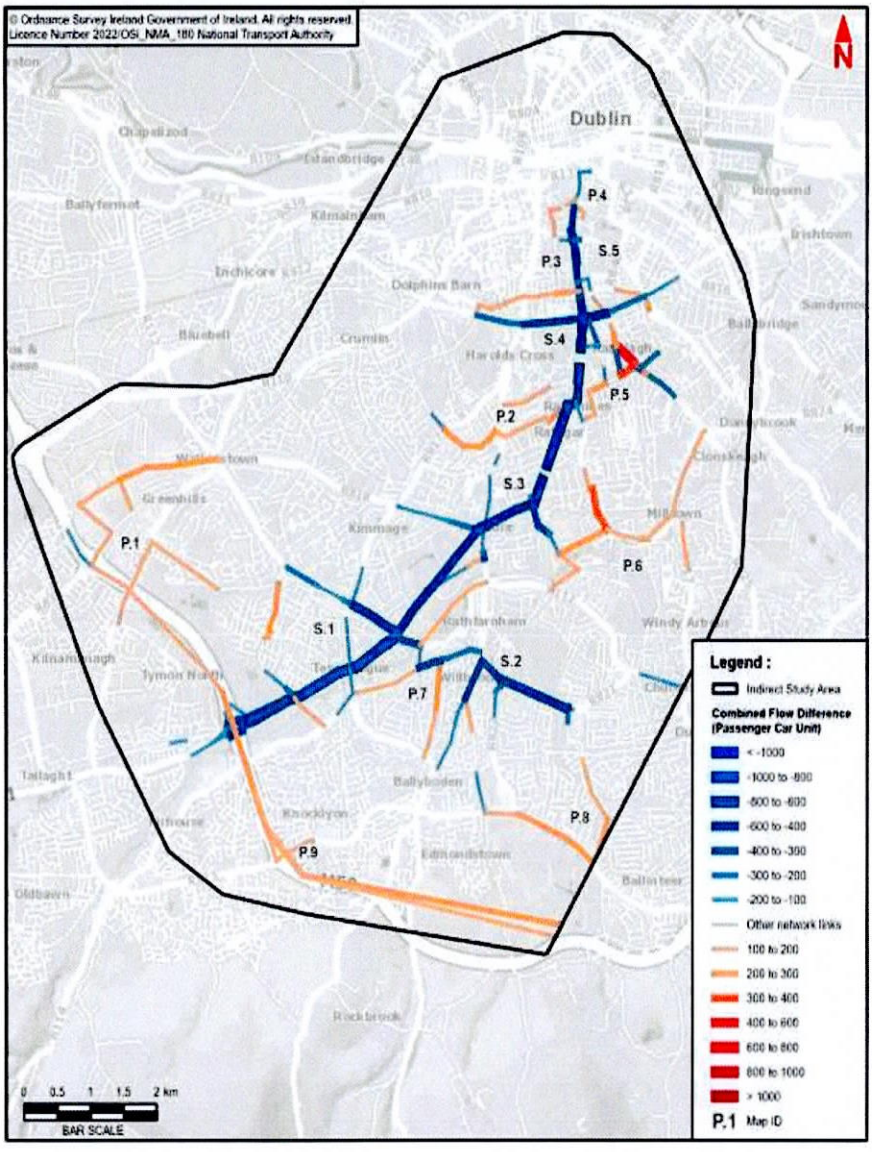


Diagram 6.41: Flow Difference on Road Links (Do Minimum vs. Do Something), PM Peak, 2028 Opening Year

Traffic Counts:

- A Traffic count prepared on behalf of the NTA indicates that there were up to **7,404 daily city** inbound vehicle movements at the Fortfield Road/Templeogue Road which includes over 300 HGV out of **22,818 movement**.
- A Traffic count indicates that there are currently 1,440 vehicle movements daily which turn right from Fortfield into Greenlea out of **8,918 movement**

Clearly there are a significant number of movements at the Fortfield junction which relate to the large school populations in the area and are unconnected with an onward journey city bound.

Table 5.2 JTC Locations

JUNCTION IDENTIFIER	JUNCTION NAME	TYPE	DAILY MOVEMENTS	AM MOVEMENTS	PM MOVEMENTS
10-1	Templeogue Road/Spawell Link Road	Priority	59,414	4,242	4,594
10-2	Templeogue Road/Cheeverstown House	Priority	30,722	1,858	2,140
10-3	Templeogue Road/Corrybeg	Priority	29,633	1,869	2,099
10-4	Templeogue Road/Cypress Grove	Signals	40,104	2,738	2,994
10-5	Templeogue Road/Templeogue Business Centre	Priority	18,255	1,115	1,333
10-6	Templeogue Road/Maxol Exit	Priority	18,614	1,145	1,365
10-7	Templeogue Road/Riverside Cottages	Priority	18,500	1,146	1,368
10-8	Templeogue Road/Springfield Ave	Signals	33,975	2,519	2,577
10-9	Templeogue Road/Springfield Road	Priority	19,242	1,523	1,389
10-10	Templeogue Road/Bushy Park House	Signals	22,818	1,981	1,701
10-11	Templeogue Road/Rathdown Ave	Priority	17,597	1,339	1,250
10-12	Templeogue Road/Rathdown Park	Priority	14,688	946	1,077
10-13	Templeogue Road/Fergus Road	Priority	14,141	923	1,042
10-14	Terenure Pl/Templeogue Road	Signals	22,763	1,548	1,621
10-15	Maxol Entrance/ Templeogue Road	Priority	18,635	1,133	1,346
10-16	Wainsfort Road/Templeville Road	R4	33,754	2,320	2,654
10-17	Fortfield Road/Fortfield Road	Priority	19,014	1,260	1,437
10-18	Greenlea Road/Fortfield Road	Priority	81,91	1,032	632
10-19	Kimmage Road/Terenure Road	Signals	34,672	2,665	2,577
10-20	Terenure Road/Greenlea Road	Signals	10,781	876	828
10-21	Wainsfort Road/College Dr	Priority	18,677	1,225	1,369
10-22	Fortfield Road/College Dr	Priority	8,827	1,153	670

The Traffic counts at the junctions above should be reproduced under the Combined Modelling under the changes proposed in the planning application.

S4 Orbital Bus

The diagram below taken from the November 2021 Greater Dublin Area Transport Studies Dublin South West details the S4 orbital route which routes via Kimmage and Terenure to UCD. It is unclear how the Templeogue Road Busgate which may potentially divert Terenure bound traffic to Terenure Road West overlays with the route. The over design capacity through Kimmage indicates a potential significant increase volume design capacity.

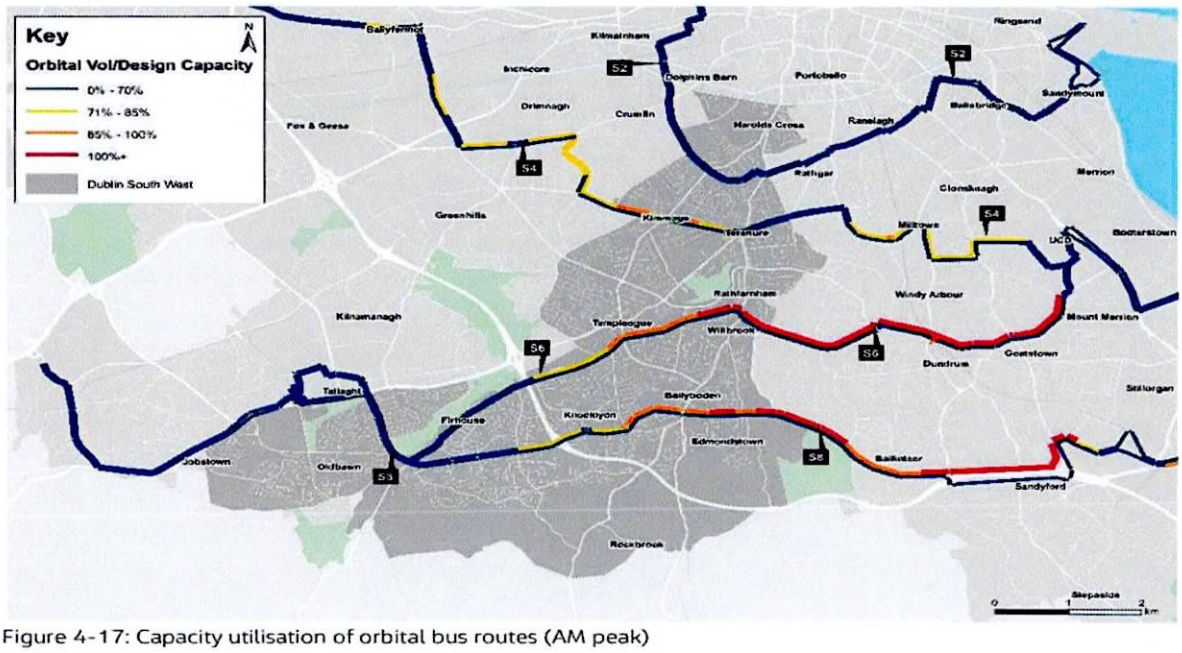


Figure 4-17: Capacity utilisation of orbital bus routes (AM peak)

Bus Capacity

Templeogue road

No	Current Capacity	Proposed
1.	**19** 12X15; 4X49; 2X65; 1X65B	10 A spine *2 1 bus every 12 mins

- **Current Capacity** – As a regular city centre Bus commuter I can attest that AM bus capacity on Templeogue completely full after 7.30 am. At that time in Templeogue Road Buses pass all bus stops until Terenure village where people alight and a few passengers can be picked up

5.2 Options development

To identify options to serve travel demand in the study area in 2042, the following steps have been completed:

- A review of relevant planning and transport policies and strategies has provided the overall context for options, and identified current thinking in relation to the future transport network;
- A baseline analysis of the existing transport network identified existing network issues and opportunities;
- An analysis of planning and travel data from the 2040 Planning Sheet and a Do-Minimum run of the Eastern Regional Model for 2042 provided insights into future travel demand and network capacity constraints; and
- A review of the GDA strategy objectives against which all options should be measured.

The above steps resulted in the preparation of an options long list for each of the key transport patterns as detailed in Table 5-2. The options long list is set out in detail below.

Table 5-2: Options long list

Type of option	Description
PT corridor	Radial public transport option connecting Tallaght to Dublin City Centre
PT corridor	Orbital public transport option connecting UCD to Naas Road
PT corridor	Orbital public transport option connecting UCD to Sandyford and Tallaght
BusConnects bus service	Service A1 – Decrease AM headway

In relation to the proposed decrease of the **A** service there is a suggestion that the volume of buses directed to Rathmines and city centre under BusConnects cannot cope with any additional volume so this may explain the decrease in service.

Table 6:47 of the application indicated that there will be 2,270 additional passengers in the AM, a request was made to NTA to provide an analysis to support the statement which is still open.

Table 6.47: 2043 Peak Hour Bus Boardings on Routes using the Proposed Scheme (inc. boarding at stops outside Proposed Scheme)

Time Period	Do Minimum	Do Something	Difference in Boardings	Difference (%)
AM Peak Hour	21,600	23,870	2,270	10.5%
PM Peak Hour	16,329	18,200	1,871	11.5%

Table 6.47 shows that there will be a 10.5% increase in people boarding bus routes which use the Proposed Scheme during the AM Peak Hour. This represents an addition of 2,270 passengers in the AM Peak hour.

In the PM Peak hour, there will be a 11.5% increase in people boarding bus routes which use the Proposed Scheme, representing an additional 1,871 passengers.

Table 6:10 of the application indicated that there will be 2,400 additional passengers in the AM Templeogue- Terenure , a request to NTA to provide the analysis to support the data above is still open.

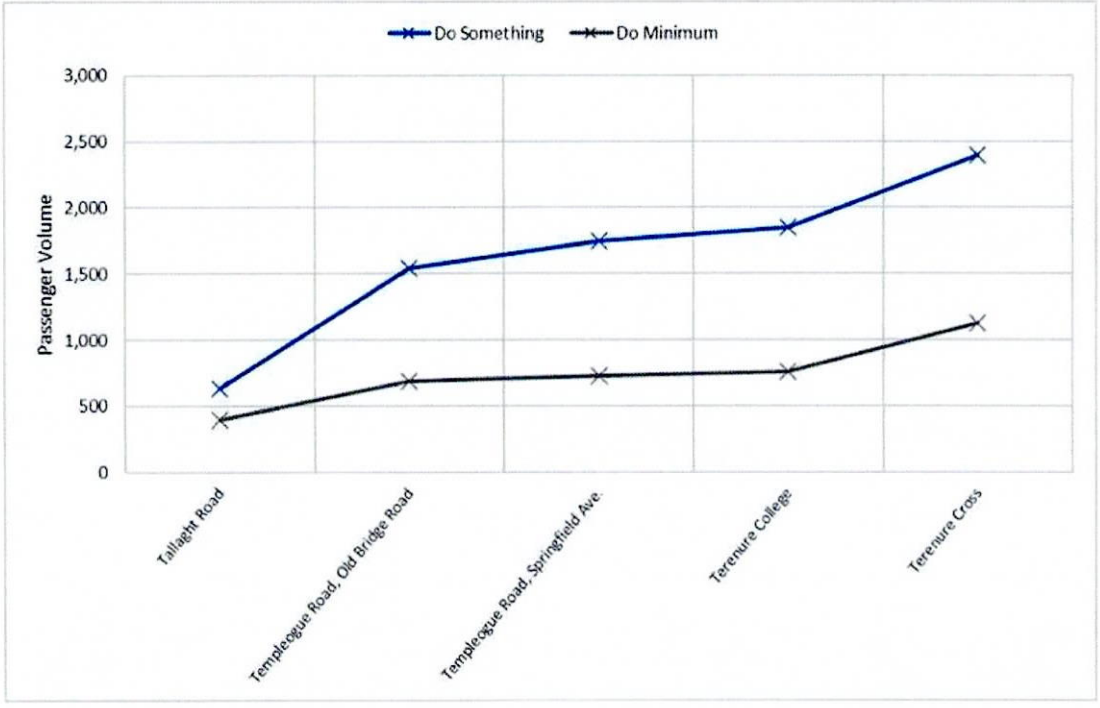


Diagram 6.10: 2028 AM Peak Hour Passenger Volume Along Proposed Scheme (inbound direction – Templeogue to Terenure)

Diagram 6.10 shows higher levels of bus passenger loadings along the Templeogue to Terenure section of the Proposed Scheme with a peak at Terenure Cross where the volume of passengers reaches 2,400 passengers in the AM Peak hour, compared to approximately 1,100 in the Do Minimum scenario.

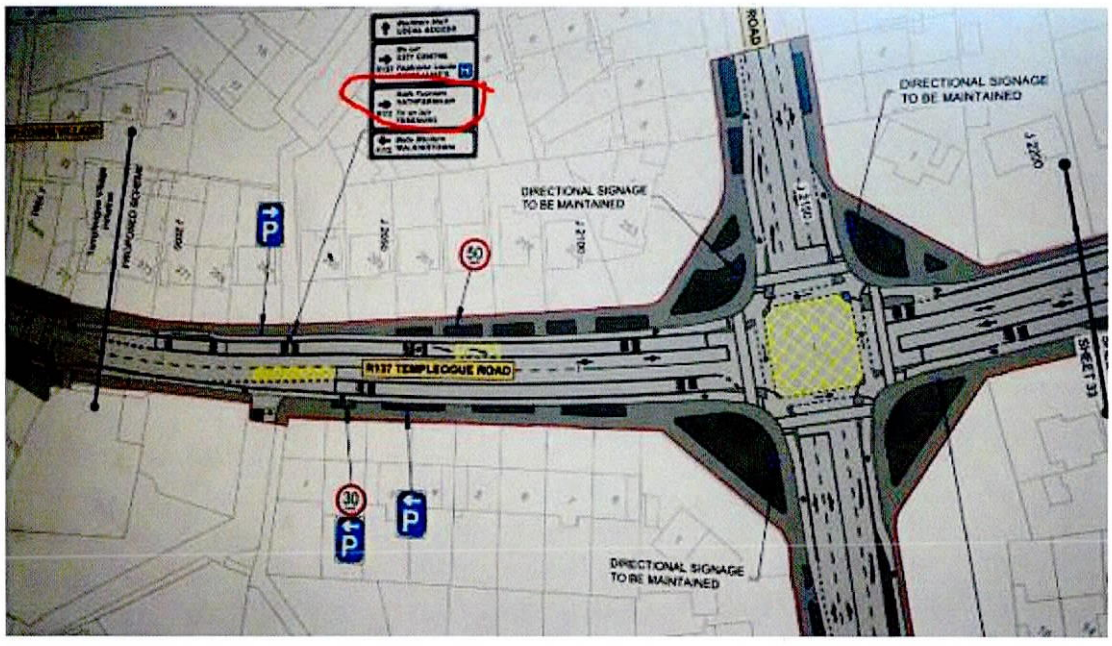
The increase in bus passengers remains at a high level along this section of the Proposed Scheme with approximately 1,000 additional users on most of the corridor, compared to the Do Minimum scenario.

Terenure Road West (TRW)

TRW is a very busy road which serves a very important orbital bus service (17), this service bring transports students from west to schools in Rathfarnham, Stillorgan and UCD. Under the proposal it is likely that the junction at Terenure Place will get very busy in the morning and will negatively impact the journey times for these students.

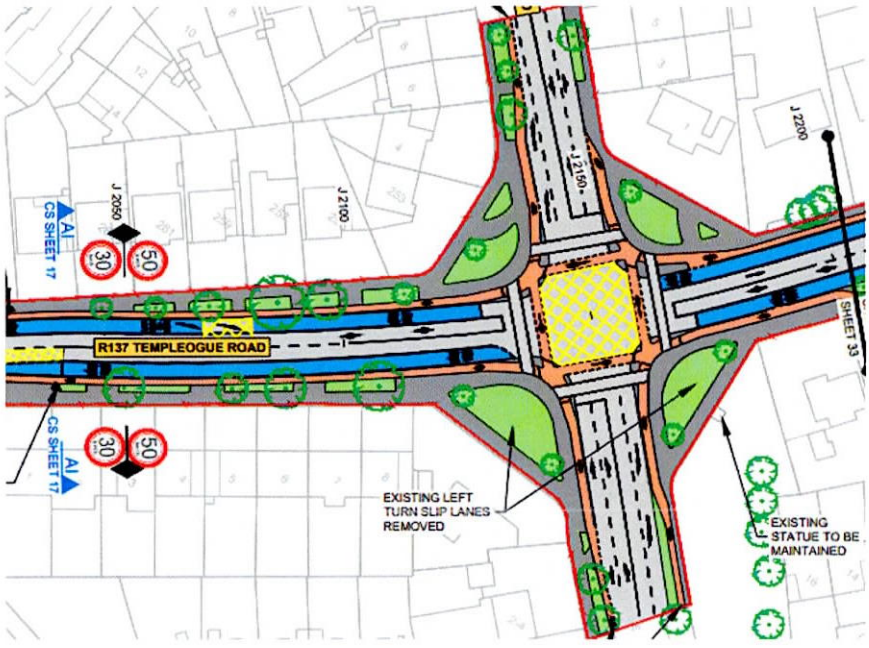
Changes in Access to Community\Commercial concerns

The NTA acknowledges that "changes in traffic flow and parking provision can impact the ability of users to access certain community facilities", the proposed changes with the Templeogue Busgate, road layout at Spawell (change of roundabout to traffic lights) and turning bans at Rathdown will have very significant impacts which are not adequately covered in any mode shift calculations i.e. it is not practical for visiting teams to switch on to a Bus to get to a match.



- **Bushy Park Facilities** – The Park provides facilities for a number of direct users e.g. Weekend Market, Soccer, Tennis, GAA, Padel, etc. How are people who travel by car e.g. how are visiting teams to navigate from the sign at Springfield (see below identified in **RED**) **that the only access into Bushy is via Rathfarnham road.** How does the Traffic Model provide for Park users who cannot switch to Bus? There will be a large overspill parking on to Fortfield Road\Lakelands.
- **Wellington Road Recreational Facilities** – Along with the large Park with a myriad of uses (soon to be expanded into a wider community facility) there are several very large Sporting facilities on this road which will be severely impacted due to proposed changes at the Spawell junction – Spawell centre, Faughs Hurling & Camogie, Judes GAA, Ballyboden GAA, Templeogue United soccer Club.
- **Terenure Rugby Club and All Weather facility** – Access to the Terenure Rugby Club and All Weather facility will be severely impacted by the additional traffic diversions which will likely result in parking in Lakelands
- **Terenure, Rathmines, Rathgar, Ranleagh Commercial centres**– Access to local commercial centres will be severely inhibited due to traffic re-diverts including the local Enterprise Centre.
- **Bus Stops** – the proposed changes to the Bus Stops on Templeogue Road will create safety issues particularly the proposed relocation of the stop at Our Lady's school which is to be moved to a narrow footpath closer to a very busy junction, the other stops closer to Terenure village are busy servicing Rathdown, Lakelands, Greenlea etc
- **Onley\Lakelands** – Introduction of the BusGate is likely to lead to disruptive oversplill parking in residential areas unsuitable for parking.

- **Emergency vehicles** – The could be significant time delays for emergency services circulating in the area particularly on Terenure Road West.
- **Inclusivity** – How does the Mode change factor used in the model accommodate people who are car dependant and cannot change patterns e.g. people with mobility issues, elderly access, carers who provide support to older Residents and then have to move to another elderly person in the area.
- **Slip roads, left turns** – The removal of key slip roads at Templeogue Road\Springfield Avenue and at the Bank of Ireland in Terenure village will cause significant difficulties in circulation for all.



Environmental concerns

Within the planning application documentation, I was unable to locate cost benefit analysis of the items below indeed the Case study comparisons used were of Toronto and London, cities which have well establish public transport infrastructure across the respective city

- CO2 impacts of removal of significant amounts of Trees on Terenure Road East and possibly on the CPO area on Templeogue Road
- Habitat disturbance along the Dodder river
- CO2 impacts from the traffic re-directs

Commercial Activity – HGV

There are large volumes of vehicles which access the proposed route to the numerous commercial centres. The commercial vehicle activity will continue and will divert on to roads which are unsuitable and unsafe.

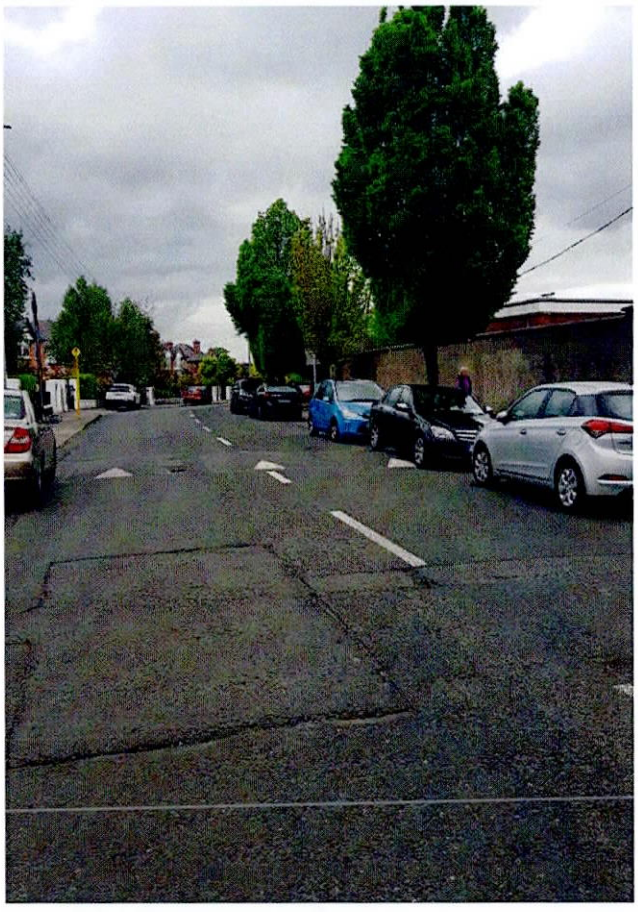
Safety Concerns:

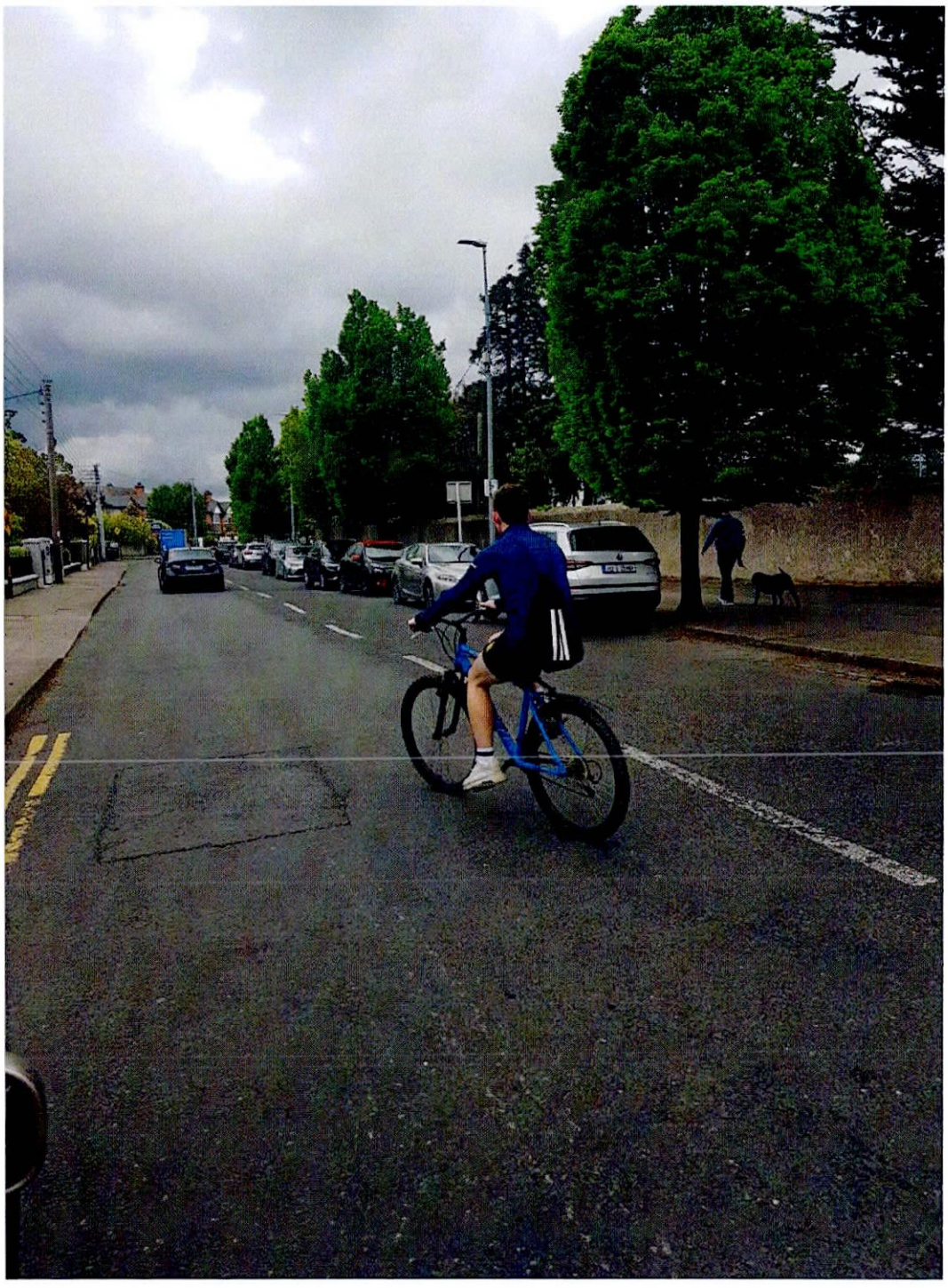
School Population:

There is a huge school population in the Terenure area which would be immediately affected under the proposal by traffic re-directs – Pius, Presentation, Terenure College, St Joseph's, Our Lady's, High School, Templeogue. Many children walk and cycle to school. Fortfield Road is acknowledged as particularly dangerous with 2 school traffic wardens present every day, Fortfield Drive potentially will see a very large AM increase – see photos of current traffic, parking at Terenure College (note U turns at Fortfield which will become a very busy circulation artery under the proposals.

Fortfield Road\Fortfield Drive: Note school railings opposite Fortfield Drive which shows a car making an illegal movement on the Road.

Busy Fortfield Road Road users – Cars, Commercial vehicles, Cyclists, Pedestrians





The Construction & Design:

Adjacent roads which will have to absorb traffic volume re-direct are unsuitable e.g. concrete construction of College & Wainsfort & Greenlea Road, two lane width of Terenure Road West, width of Fortfield Road to accommodate cyclist, parking, buses and cars.

Conclusion:

The vast majority of the issues above result from the proposed Bus Gate & right turn bans on Templeogue Road and the Spawell junction reconfiguration, a change in the planning application on these aspects could alleviate many concerns. The Bus priority system currently in place on Templeogue Road functions very well, the proposal as presented is very positive on Bus Priority with 12 included in the proposal. It was unclear what Modal Shift has been applied and how Journey types for Residents in the area (i.e. Journeys which cannot shift to another mode) are accommodate in the model. Road configurations will cause difficulties. The reduction of bus service on Templeogue Road is extremely disappointing.