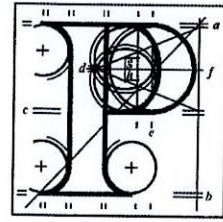


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Grainne O'Neill & Others  
4 Tower Avenue  
Rathgar  
Dublin 6

**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](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
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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**

**Written By Grainne O'Neill**

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Home Address: 4 Tower Avenue, Rathgar, Dublin 6

Email: [REDACTED]

Tel: [REDACTED]

This submission is being supported by the attached residents, whose names and signatures are at the end of this document.

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The technical nature of the online documents has limited the ability of many residents in our community to fully understand the issues. We would also like to note our disappointment with the €50 fee required in order to make a submission to ABP on these plans which directly impact many of our members in Rathgar and residents of South West Dublin. Some residents who will be greatly impacted cannot afford the cost of making a submission or feel like they do not have the technical knowledge to make a submission to ABP.

While the initial Busconnects proposals have been amended through various iterations of NTA led "public consultation", we believe the plans continue to unnecessarily overburden Rathgar village and surrounding roads, but offer little benefit by way of improved public transport. Residents, communities and businesses have been side lined as an inconvenient afterthought in the proposals.

We fully supports improvements to Dublin's bicycle lanes and public transport network, in particular from an environmental and public health and safety perspective. However, we also believe that Dublin's environment, heritage and community should not be compromised by the introduction of the bus corridor proposed by BusConnects. In its current form, it promises to save commuters mere seconds off journey times.

The price is too high for so little gain: heritage, trees and wildlife are threatened across Dublin. Key concerns for the Rathgar area include the impact on environment including increased emissions, noise and loss of trees, Compulsory Purchase Orders on Terenure Road

East (and further afield on Rathfarnham Road), traffic implications on all local streets and roads, the negative impact on the public realm and streetscape, the bus gate at St Mary's College in Rathmines, one way traffic, right/left turn bans and the impact on the businesses in Rathgar during construction phase and due to loss of parking in the village and in the area. The RRA is also enormously concerned about the proposed reduced width of footpaths in the Rathgar area and also question the overall safety of the proposed cycle paths.

Road-widening, which threatens the architectural layout of our streets and will require the felling of mature trees, is strongly opposed. Residents on many of our smaller streets and roads in Rathgar will suffer as a result of increased traffic flows and parking issues. Many villages across Dublin are at risk of losing their identity due to the proposed Busconnects design which is based on outdated road widening and indeed outdated traffic count data which was collected in November 2019 and February 2020. This data is no longer indicative of the traffic flows in and around Rathgar as residents can attest. CSO statistics reveal the change in commuter traffic and in the continuation of working from home patterns by so many workers.

Terenure Road East, Rathgar Village and Rathgar Road are not bus corridors. They form a residential area with schools, hospitals, places of worship, shops and a vibrant community. Spanning out from these roads are a myriad of smaller roads and streets which have their normal ebb and flow. BusConnects' plans propose a total change in the dynamic of these roads, in particular Highfield Road which will now see an increase of traffic and the introduction of a new Orbital bus route. Many other side streets in our area will suffer devastating knock on effects including increased traffic, increased emissions due to congestion, one way systems and parking issues. What the NTA has refused to do, however, is to the trial the proposed traffic changes.

A comprehensive underground metro would allow Dublin's residents, commuters and visitors to access the city and its environs whilst saving Dublin's environment, built heritage and special character. The introduction of school buses would also make a vast improvement to the lives of both families and residents across Dublin.

The NTA admitted in its own material (page 3 public consultation January 2019) that:

*"Growth areas can only be served in the short and medium term by the bus as opposed to the long-term projects such as rail and luas."*

Four years have passed since that statement was made. The NTA admits that this is a short term solution which cannot possibly deal with the real issues; so why fell mature trees? Why CPO land to widen roads? Why undermine established communities? Why permanently destroy the Georgian and Victorian heritage of niche urban villages?

As a short-term solution there are many changes that could be made to make the current bus system more efficient at no cost to community and villages. These include policies aimed at reducing private cars on our roads; for example, implementing congestion charges and comprehensive park and ride facilities.

It is also noteworthy that the NTA has not proposed a new park and ride facilities at the Tallaght/Templeogue M50 turn-off to encourage car drivers out of their cars and onto more environmentally friendly bus services (in the absence of a metro). The NTA is making no actual

effort to take cars out of the system in South West Dublin nor is it encouraging commuting traffic to swap to bus services as they enter Dublin City which. Either would ease congestion on our streets and improve South West Dublin's air quality without requiring infrastructural changes.

There are steps that could be taken now which would improve bus times. It is impossible to understand why the NTA has delayed measures which would prioritise buses over other traffic. The NTA should also be required to introduce non-invasive measures to improve bus journey times for example by introducing priority bus lights, cashless fare on buses and other technical advances. It is exasperating – and frankly cynical - that these measures, in particular cashless fares, have been linked to this BusConnects planning vehicle.

One is left with the impression that the NTA is artificially attempting to obscure that these costly infrastructure changes will provide little improvement in time saving to the bus commuter journey by bundling the tried and tested non-invasive time saving measures in with the bus corridors in an effort to ensure that some positive time saving can be pointed to.

There is simply no sound basis for resorting to archaic road widening and tree removal. Jennifer McElwain, Professor of Botany at Trinity College Dublin, made a submission to the NTA against tree felling. We rely on that submission as hugely valuable trees are still to be lost unnecessarily. (See submission attached for your convenience.)

We urge that all non-invasive improvements be made before any irreversible and detrimental changes are made to our villages, streets and the environment of Dublin and the Greater Dublin Area. We also believe that any proposed measures should be trialled before planning is granted to fully ascertain the impact of the BusConnects' proposals, particularly as traffic modelling has been performed in a piecemeal fashion. The traffic implications of all 12 corridors running concurrently have not been modelled let alone trialled in real time.

The true cost of the environmental fallout of traffic and congestion cannot be understood until traffic modelling for the entire Busconnects project is performed. Therefore, the Environmental Impact Assessment (EIA) submitted by the NTA for this corridor is fundamentally flawed and is not fit for purpose as it does not take into account the fall-out of other bus corridors in the area for example the Kimmage to the City Centre Corridor etc.

Given that the NTA has not proposed any new park and ride facilities for this bus route - and in view of the fact that it is the NTA's own stated aim is that BusConnects is intended to make it more difficult to drive a car in Dublin - an inevitable impact of this proposed corridor (with the traffic changes) is that there will be more not less car traffic; it will simply be rerouted. The NTA proposal offers no alternative parking solutions for commuters. Therefore, they will be forced to make enormously circuitous routes to the city centre thereby increasing emissions, and causing further negative environmental and congestion impacts. The traffic implications for residents and commuters alike have not been modelled; we fear that that is a deliberate lacuna in the data as it would reveal the chaos that will ensue.

The current plans overburden Rathgar village and surrounding roads with an increase of bus frequency which will be detrimental to the liveability of our village and area. The NTA's insistence on routing all buses from Templeogue/Tallaght and Rathfarnham through Rathgar

Village puts a disproportionate burden on Rathgar (and on Rathmines). These bus routes could have easily been separated with a bus service interconnection in Terenure Village and separate bus services along Terenure Road East (towards Rathgar) and, alternatively, along Terenure Road North and Harolds Cross Road. Indeed, the interconnection of bus services lies at the centre of the Busconnects ethos so it is very difficult to understand the proposal to route all those buses along one route only (through Rathgar).

Forcing all buses through Rathgar has the direct impact of overwhelming Rathgar village and community. The route had previously been designated as a cycle route, but that too has been reversed by the BusConnects proposals.

The NTA proposals will also lead to an inadequate public transport service for Harolds Cross Road which is experiencing a huge growth in housing and education facilities.

A major flaw in the BusConnects' plan for this corridor is that the N81 and R137 have been inexplicably bypassed. For years, the Rathfarnham to City Centre Quality Bus Corridor (QBC) has used the Harolds Cross Road as its route into the city centre. The R137 was identified as a QBC because it is a shorter, more direct, unconvoluted, and wider route to the city centre. Instead, BusConnects plans to have buses turning down the mainly residential Terenure Road East.

Signage in Terenure currently directs incoming city traffic via Harolds Cross Road. The NTA's decision to totally discount the Harolds Cross Road has the effect of leaving a large wedge of the city underserved by public transport while overburdening Rathgar and Rathmines, the latter which is already serviced by the Luas (at Beechwood and Charlemont).

During public consultations with the NTA, the above flawed analysis was highlighted to the NTA by the Rathgar Residents Association and individually by residents. An alternative routing of this proposed corridor via Harolds Cross Road was proposed, but the submission was dismissed by the NTA with a few paragraphs of generic text in the submission analysis. Failure to consider the Harolds Cross Road comprehensively – in circumstances where it was originally identified by the same agency for BRT – wholly undermines this planning application. A full rescoping feasibility study and option assessment, including population growth and access to bus services, is required.

## **FLAWED INITIAL PREMISE**

The cost of this corridor is significant in terms of the compulsory purchase of land along the route, the build cost and all of the fees including consultancy, design and legal fees. Their stated aim is as follows:

*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 2040*

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

If we are to break that down into its component parts, it immediately becomes clear that the cost and reduction in quality of life and environmental impact far outweighs any theorised improvements.

With regard to environmental impact:

A considerable amount of tree removal will take place – at Rathfarnham Castle Park, Rathfarnham Road, possibly on Templeogue Road and at Rathgar Road.

There will be a particularly significant impact from an environmental perspective at Rathfarnham Castle Park, where a large section of woodland area of up to 10 metres in width by roughly 400 metres in length is set to be removed in order to widen the Grange Road. This particular woodland area borders a peaceful Woodland Playground and natural play space, which is particularly valued by autistic children and families. It contains very many mature trees which will be lost if these plans go ahead. This area is also an important breeding habitat for many protected species including bats, frogs, tufted ducks, mallards and very many protected wintering birds, however it has not been subject to proper environmental surveys in relation to most of these.

There is also an important watercourse, the Whitechurch Stream, which runs under the Grange Road into the Park where it feeds and drains the duck pond and exits again close to Butterfield Avenue. This is very important from a hydrological perspective, yet has not been identified or assessed in the hydrological or hydrogeological assessments. It is an open watercourse at many points within the Park. Overall, it appears that this particular area, Rathfarnham Castle Park, which is proposed to be very significantly impacted by the Scheme proposals, has been almost entirely overlooked in relation to environmental assessments, despite being a significant wildlife habitat and very important public amenity, particularly for local autistic children and families.

There is a likelihood that a lot of essential car journeys will flow through a very small number of roads rendering them stationary due to sheer traffic volumes

The NTA, by their own admission state that the roads surrounding the main corridor will have increased volumes of traffic

Rathgar Road will be a prohibited route outbound, up to 9,925 vehicles that use this route will have to find a different route, as will the up to 522 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 likely to get increased traffic including the lorries, as it seems to be the likely preferred option for accessing Rathgar from Rathmines. It is already a bottleneck and this will cause significant disruption for the residents of this road.

Rathmines Road will be a prohibited route, up to 9,731 vehicles that use this route inbound and up to 9,916 vehicles that use this route outbound will have to find a different route as will the up to 73 inbound lorries.

Every one of those extra vehicles passing through a residential area is a possibility for an accident to happen. They will impact 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.

There are also journeys in the opposite direction to town. Many residents travel out of the city towards the centres of business such as CityWest, Robin Hood Industrial Estate and to colleges such as TUD Dublin, Tallaght Campus. Existing and increasing populations will need access to a means of

transporting themselves to these centres of education and employment. The corridor plans do not take account of any of these needs and the bus network plans assume people will be willing to change buses not just once or twice but up to three times in order to get to their desired location. The fact is that they won't do that, they will take cars and there will be an increase in car volumes on many of the now proposed more limited arteries to these destinations.

Also, given the very unreliable nature of the current Dublin Bus service, I do not have confidence that the new bus service will provide sufficient and reliable service that people can rely on with confidence.

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.

### **Walking**

There is no shortage of well-lit footpaths and safe pedestrian crossings all along the way. Nothing in these plans significantly improves or to be fair reduces walking infrastructure. Therefore, this objective cannot be asserted with regards to this corridor as an improvement.

### **Cycling**

There is no doubt that the corridor as designed delivers a significant increase in much needed segregated cycling infrastructure.

However, there are two obvious flaws to the scheme as set out which must be considered against the objectives of the entirety of the scheme as they conflict with the provisions of the National Cycling Manual, a publication of the applicant, the National Transport Authority.

The provisions of the manual state:

*The principle of homogeneity is that reducing the relative speed, mass and directional differences of different road users sharing the same space increases safety. This has a beneficial impact on the level and severity of accidents that might otherwise occur. Where the relative speed, mass or direction is not homogenous, different road users may need to be segregated.*

*And in addition to that in the context of the needs of cyclists it states: The cycling network should link all main origin and destination zones / centres for cyclists. A well-targeted cycle network should carry the majority of cycle traffic (in cycle-km terms).*

*Cycling routes within the network should be logical and continuous. Delays, detours, gaps or interruptions should be avoided. Markings and signage should be clear and consistent...*

*Continuity of Route: It is illogical to discontinue cycling provision near busy destinations to accommodate or maintain other traffic flow*

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.

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. See figure above.

The seriousness of supporting the change to cycling needs to be measured when we have a situation where on-street bike storage is more expensive than the cost of a residents parking permit.

**“... 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.

Given that the objective was to change transport modalities, other measures such as for instance congestion charges, subsidised or free bus services and a proper on street or underground metro system did not have to be disproven as a real alternative before such a costly plan was rolled out. The view that this is the only way to achieve the objective without being obliged to model the collective impact of other measures is disproportionate. Nowhere is the rationale of choices made set out, at least if they were explained there might be a greater possibility of buy in. Instead, there are no objective comparisons, even the feasibility study of the alternative South West Metro had its terms of reference gerrymandered by the NTA to a point that the outcome of the report was bound to be inadequate. The blatant lack of any engagement on any alternatives is not just maddening but also legally arguable.

It is not just residents in these suburbs who use public transport, people coming to Dublin for matches, music gigs, hospital appointments and a plethora of other reasons also come to Dublin and a significant portion come by car. If the bus infrastructure is envisaged as a 24/7 travelling system, then why are there no plans for park and ride opportunities throughout the entire bus corridor network – there isn't one!! If the bus gates are needed for Sunday traffic then accommodate all Sunday traffic including those who travel to Dublin for events.

There is a huge need for sustainable public transport and 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.

### **Flawed Public Consultations**

There is no doubt that some changes have come about due to public consultation and public representative lobbying. However, the applicants state that they engaged in stakeholder



consultations and set out the dates for same. Two of the three public consultation periods took place at the height of the covid pandemic and physical public meetings could not be held. Meetings were held on line and engagement was very strictly controlled. This does not constitute public engagement.

While the period for observations to An Bord Pleanála was extended due to a typographical error by the application, the fact of an ability to make an observation must be seriously challenged. The documentation attendant to this application is considerable by any standards. 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.

Also, the fact that there is a charge of €50 to lodge an objection, in these times, makes it prohibitively expensive for many people.

The fact that it is challenging is not an excuse for bullying through a scheme, in fact three schemes that disproportionately affect a small area. The NTA have consistently bullied through these changes from a perspective of “we know best”, and the Minister, Eamon Ryan, has washed his hands of any calls on him to ensure that it is more democratic – and he is a TD in a large part of this route!

The Preliminary Design Report for this corridor cites stakeholder engagement and lists representatives groups – representatives of what? In many instances when requests went in for meetings with Residents Associations, this was rejected and 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.

Amendments to turns and road markings usually undergo a process within the Local Authority that involve public input, Local Authority input and Garda Síochána input – this methodology has a proven track record of being able to take into account the very localised consequences of any changes. Yet this methodology is nowhere in evidence within the plans and it is not clear if An Bord Pleanála will take this into account or how they might go about it if they were even minded to do so. It is my view that this application lends itself perfectly to an oral hearing so that amendments could be made at that level of minute details.

### **Bus Stops**

A considerable number of bus stops are being removed. This alone would bring about shorter journey times as the bus isn't stopping as much as it would otherwise be and does not in any way consider the walking times of elderly or infirm passengers. For example:

- Bus stop at Rathmines Park inbound and outbound removed. It will be necessary to walk to Circle K
- Bus stop at Garville Ave inbound removed to Winton Avenue
- Outbound bus stop at Brighton Road removed
- Inbound bus stop near Brighton Road moved to Rathgar village

### **Flawed traffic modelling and counts**

The traffic counts that form the basis of these plans have not been updated since before the covid pandemic. This week there was an announcement that Ireland has been the country in the EU that embraced remote working the most, this means that traffic counts and needs must have changed. This has not been accommodated within the modelling. On the corollary of that, the expected rise in population hasn't been considered fully, I would venture to add that were it to be properly considered a Metro would be a preferable solution for mass public transportation.

The plans do account for the increase in traffic volumes however the basis of the projection is flawed. The only periods covered in Bus Connects projections of extra traffic are 7am to 10am in the morning and 4pm to 7pm in the afternoon. They have wholly omitted to deal with any other time of day when extra traffic may be more noticeable and will be evident due to the fact that the bus gates are for much longer than would be required and apply seven days a week.

I feel that there will be a number of ratruns on the smaller roads and there will be an enormous volume of lorries and commercial white vans that use Templeogue Road will be forced into residential areas. This will also happen in other roads.

### **Elderly and Disability Access**

The public transport system has very little equality of access for the people with mobility issues. Every bus has a very limited number of spaces to accommodate wheelchairs; priority for mobility impaired people is reliant upon those very people asserting their rights and relying on bystanders to support them in those assertions. Safer and more reliable means of transport for those with disabilities and the elderly is by taxi or by private adapted car and in some instances special transport is required and provided. All of these need access to the roads that these residents live on. While taxis will be able to use the bus corridor, all other private transport will not.

On our road alone, Tower Avenue which has just 14 houses, 20% of the residents are over 80 and require mobility assistance when travelling.

The entirety of the bus corridor plans need to be proofed with the rights of persons with disabilities and the elderly in mind.

St Luke's Hospital

St Luke's Hospital describes itself as follows:

*We are dedicated to being a world class leader in cancer treatment, patient care, research and education. In striving for this excellence, the holistic needs of our patients and their families are our greatest concern.*

*Since it opened in May 1954, St Luke's Hospital in Rathgar, Dublin, has been caring for cancer patients from all over Ireland.*

*In July, 2005, the then Tánaiste and Minister for Health and Children, Mary Harney, T.D., announced plans to develop a national network for radiation oncology services. As a result, in 2007, the National Cancer Control Programme (NCCP) was established.*

*Under the Health (Miscellaneous Provisions) Act 2010, St. Luke's Hospital became part of the HSE and later part of the St. Luke's Radiation Oncology Network.*

*This network operates from three locations - St. Luke's Hospital, Rathgar, Dublin and St. Luke's Radiation Oncology Units, which opened in March 2011 in St. James's and Beaumont Hospitals.*

St Luke's see patients from all over the country – many currently access it by coming off the M50 at the Spawell through Templeogue Village, Terenure Village, Rathgar Road and Highfield Road. There will be an increased delay accessing Highfield Road because of the bus gate at Terenure Place and the traffic system coming into effect at Rathgar Road/Rathgar Avenue meaning there will be additional traffic on Highfield Road as a result of Rathgar Road becoming a one way street.

St Luke's is also the site for LucDoc, the out of hours GP service for Dublin 6W and Dublin 6 as well as Dublin South Central and Dublin South East. It is currently temporarily relocated to Clonskeagh Hospital Campus but St Luke's is its normal residence. Patients registered with the GP practise in Templeogue for instance have to travel to LucDoc for the out of hours service. This is a 3km distance to go directly from Templeogue Village to Highfield Road in Rathgar. Under the new requirements, the same journey will necessitate a 6km distance along roads now more populated with cars.

Immuno-compromised patients cannot take the bus nor would it be desirable for patients with potentially infectious conditions to take public transport, they are dependent on private cars. Nowhere in the plans is there a reference to the difficulties that will arise accessing St Luke's, therefore I can only conclude that it wasn't a consideration.

### **Parks, Sports Facilities and Playgrounds**

Sports facilities for the young and old are at a premium across the South City area. Every smidgeon of park is booked by several entities and well used by all sports groups/clubs and running clubs. Young children are reliant on lifts from parents to get to the parks and access is needed to successfully accomplish this.

While it might be counter intuitive to drive to a park for fresh air and exercise, the fact is that it happens and bus routes are not always direct to the parks utilised by the community. How is access to Bushy Park going to be achieved? Where are car users going to park? Access to this park is going to be very limited or cars are going to park on the already overburdened and congested Fortfield Road as a consequence of the Templeogue Road changes and walk down. In the alternative there is going to be a huge round trip along the Dodder View Road onto Rathfarnham Road and into Rathdown that way to be able to park to access the park. Consideration must be given to users during the winter and the fact that it isn't safe for young men and women in general due to antisocial behaviour in the vicinity. And the solution to that isn't gardai, nor should it be left to the Gardai – we really need to give proper consideration to the fact that safety must be paramount.

### **Heritage**

The areas of Springfield and Bushy Park were all originally manor houses that gave their names to the residential roads and park now sitting on what was once their estates. The boundary wall of Bushy Park that is currently under a CPO is the only remaining part of the boundary wall between the Bushy Park House estate and the Terenure House Friary that pre-existed the College. The road was built in 1800. Terenure College which was built on the Carmelite lands in response to the need for Catholic Schools that arose following Catholic Emancipation, the college was established in 1860. A plaque on the original wall commemorates the still existing recess created within the wall structure that was the stone depot for the local authority when building the road between these two estates in 1800, now Templeogue Road. This area with trees on it that have predated its construction is now scheduled to become a cycle lane tracking the worn route on the grass by joggers.

The Chapter 3 document concedes that architectural heritage will be impacted stating:

- ***Archaeological, Architectural and Cultural Heritage*** – *there is the potential for impacts on archaeological, architectural and cultural heritage when providing CBC infrastructure. The assessment had regard to Recorded Monuments and Protected Structures (RMPs), Sites of Archaeological or Cultural Heritage and on buildings listed on the National Inventory of Architectural Heritage adjacent to the corridor;*

### **A Quick Note on Reasonable Alternatives**

Chapter 3 of the Documentation entitled "Consideration of Reasonable Alternatives" is supposed to deal with alternatives. One might expect that detailed explanations would be found therein that

would give residents the confidence that this is the best way forward and nothing else would be as effective.

The document has one sentence the length of two lines that dismisses the option of rail based public transport as not having the population to support it. Areas within this corridor and to be served by this corridor have seen a population rise of up to 10.2% (CSO 2021), and more housing is scheduled to be built along and around it.

We are talking about 2040 plans that appear not to be able to conceive population growth. On top of normal nature population growth as evidenced in the recent census, according to government sources over 30,000 Irish people return to Ireland from abroad to live and work every year. We have had over 80,000 Ukrainians come to Ireland in a little over a year and a half, it is estimated a significant number of them will not return to Ukraine but will make their long term home in Ireland. We are incentivising housing developments in these areas and yet we cannot plan for a population increase!!

The metro alternative at paragraph 3.2.6 merits 201 words over three paragraphs.

This is not a consideration of any sort of reasonable alternative – an abject failure to consider population growth and metro when citing a reduction of travel times over that same period of 45 seconds is a very small improvement in journey times at a huge cost.

### **Disproportionate Impact For Very Little Gain**

The boast of the NTA is increased capacity and reduced journey times. In the past residents have calculated the numbers of actual seats travelling into town on specific routes comparing now with what is planned, and on the 15 route for instance, the number is significantly reduced under the proposed plans. The current published timetable for the 15 indicates fifteen buses leaving the Ballycullen terminus between 07.00 and 07.59. However, this is to be reduced to five when this route becomes the A1.

The reduced journey times are claimed as a significant reason for the changes however these are minimal, this is a screen shot from the Traffic and Transport Chapter 6 document, page 136:

**Based on the results presented in Table 6.53, the Proposed Scheme will deliver average inbound journey time savings for A2 service bus passengers of circa 6 minutes in the AM in 2028 and 4 minutes in the AM in 2043.**

This figure arises when you compare “do something” with “do minimum” projections – so ultimately we are talking about a reduction in travelling times of 4 minutes in the long run.

I am advised that this is the second lowest time saving claimed across the 12 bus corridors, and this is on the Rathfarnham to George’s Street route. Of even more astounding figures are those of the Spawell to City Centre time saving by 2028 and 2043, cited on page 131 of the same document ... cited as follows:

**Based on the results presented in Table 6.51, the Proposed Scheme will deliver average outbound journey time savings for A3 service bus passengers of up to 1.6 minutes (15%) in 2028 (PM) and 0.8 minutes (8%) in 2043 (PM).**

Let us be clear ... the calculation is that by 2043 we will save 0.8 of a minute, that’s 45 seconds shorter travel time!!!!

By 2043 we could have a very accessible Metro system in place that could cater for increased population and would be significantly more attractive to changed modalities.

These plans are warranted from a cycling infrastructure perspective albeit even that needs to be improved, but from any other perspective there are better ways to achieve the macro objective of changing modalities than this considerable expense for such a limited improvement.

## **SPECIFICS OF THE ROUTE THAT HAVE NOT BEEN ADDRESSED OR WHERE CONGESTION AND INACCESSIBILITY WILL BE AT IT'S HEIGHT.**

The Rathgar Road plans to turn it into a one way system is draconian and totally unnecessary. This is a wide road, and it comes into narrower two way stretches so it would appear that this road is being used to gain the 45 second advance in travelling times. However, at what cost? If you live on any of the road off that road and want to get to Terenure you now have a circuitous route all the way around Grosvenor Road if you live sufficiently down towards the Rathmines end of the road, or double back and go via the Harold's Cross Road and Terenure Road North to get there. The bus lane will still have to stop at bus stops cutting across the cycle track. There is no safety improvement at a considerable cost of emissions due to longer journeys brought about by the one way system.

The right turn bans are going to lead to a lot of u-turns in the areas where they apply and these will be done on roads that already have increased traffic volumes which is why the turn bans have been put in place. The peripheral roads will become rat runs as a means to do a "lawful" u turn.

There are concerns about the church in Rathmines and many of the parishioners who believe that the traffic restrictions being brought to Rathmines will effectively lead to the closure of the church.

Huge changes in the way we live our lives are necessary if we are to properly play our part in climate change.

However, the communities, villages and individuals, especially with disabilities or mobility issues, must be considered.

## **DUBLIN CITY DEVELOPMENT PLAN**

The proposed Dublin Bus Corridor plan is in direct contravention of many of the aims set out in the Dublin City Development Plan.

The following section is all related to how the proposal is in contravention of the Dublin City Development Plan.

In the Executive Summary, it states that the aim of the development plan is to

*Urban villages and smaller neighbourhood centres will also play a central role in developing the concept of a 15-minute city. This means people's daily requirements can be reached within 15 minutes by foot, bike or public transport. The plan aims to continue to consolidate and environmentally upgrade these local centres*

As a village, Rathgar has struggled to retain shops. This proposed developed along the bus corridor will completely destroy the village, and we will have even more vacant shops. This means that we

may end up having to go to these out of town shops (which the development plan wants to discourage us doing). What alternative do we have if our local shops are closed?

Later in the document, it also states:

*The city's Key Urban Villages, urban villages and neighbourhood centres have their own identity and sense of place. They allow people living in different parts of the city to access a wider variety of commercial, community, social and cultural services locally. These centres will support the 'proximity principle'*

Rathgar will definitely not have its own identity and sense of place. The plan is to knock down trees and destroy the walls, many of which were built in the 19<sup>th</sup> and early 20<sup>th</sup> century.

In the Introduction, it also states:

*d) Cultural/Built Heritage – making provision for cultural facilities throughout the city and increasing awareness of our cultural and built heritage*

This plan is showing no awareness of our cultural and built heritage and is destroying the built heritage which is part of the character of the area.

In Chapter 4 it also states:

*These features, coupled with the larger areas of Victorian and Edwardian architecture north and south of the canals, and the urban villages, underpin the city's strong character and identity, which is recognised internationally. Dublin's character is derived from its historical layers, ranging from its medieval origins to substantial new contemporary interventions in the built environment in areas such as the Docklands*

Dublin is a city and is not just confined to Dublins 1 and 2. The whole character of the city needs to be preserved. This is what attracts people to our city.

In Chapter 4 it states:

*The development plan aims to protect and enhance the unique character of the city, derived from both the natural and built environments. Opportunities for new development will be required to respect the character of the city by taking account of the intrinsic value of our built heritage, landscape.*

The proposed bus corridor does not protect the areas in any shape or form.

*4.3 Challenges Key challenges for the city include: ♣ achieving the balance between providing for compact growth, appropriate densification and placemaking in accordance with national and regional policy, yet ensuring innovative and sensitive development that respects the city's unique character and enhances its natural and heritage assets;*

Again, this plan does not adhere to the principles above.

*4.4 The Strategic Approach The vision for the urban form and structure of the city is to achieve a high quality, sustainable urban environment, which is attractive to residents, workers and visitors. ....*

*♣ The creation and nurturing of sustainable neighbourhoods and healthy*

*♣ The promotion of development that enhances and nurtures our natural heritage assets, which improves biodiversity and which develops a green infrastructure network for recreation and amenity.*

This development will kill off Rathgar village completely again meaning that we will have to travel further.

Further on, it states that it aims to:

*♣ To encourage development that enhances, integrates and respects the city's heritage and cultural assets and that is sensitive to the setting and context of buildings and features of conservation and archaeological merit.*

Again, the plan does not do this.

*SC19 High Quality Architecture To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods*

The Bus Corridor does not positively contribute to the built or natural environment and is not befitting of the city's environment and heritage and diverse range of locally distinctive neighbourhoods.

*SC22 Historical Architectural Character To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures*

Again, the bus corridor is not in harmony with the area's historical spaces and structures.

#### *Chapter 5*

*Older People: In 2016, 72,355 people were aged 65 years and over, comprising 13% of the city's population and representing an 8.8% increase since 2011. Under most recent Central Statistics Office (CSO) population projections, trends indicate that the number of people over the age of 65 is expected to increase nationally by approximately 34% in the period 2021-2031.*

Older people's needs are not being taken into account at all with this bus corridor. Those with restricted mobility will have to walk further to bus stops, and those who do drive, will be directed through a series of one way routes. At present, only those who take taxis will be able to be collected easily at certain times. Usually, the older demographic would not be in the position financially to regularly take taxis.

*QHSN17 Sustainable Neighbourhoods To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.*

There is no evidence that that the plan caters for people who are not in the whole of their health.

*QHSN12 Neighbourhood Development To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which: ♣ build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places;*

*♣ promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects;*

the proposed Dublin Bus Corridor will certainly not be attractive

*♣ cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion;*

the plan does not cater for all age groups and people of different abilities

*♣ provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life;*

As the plan is likely to have a detrimental effect on Rathgar village, it is likely that the few shops remaining will struggle to stay open.

*Investment in Key Urban Villages In the suburbs, there are challenges relating to the traditional street, the parade of local shops or older shopping centres that are no longer strongly competitive and have now to compete with the growing presence of convenience supermarkets and on-line retailing.*

The proposed bus corridor will not support the trade of the local village in Rathgar. It is likely to lead to a further deterioration of the village with more shop closures.

#### Chapter 7.4

*Promote and consolidate the role of urban villages and neighbourhood centres so that they can provide convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.*

*CCUV25 Neighbourhood Centres / Local Shopping To support, promote and protect Neighbourhood and Local Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities.*

Both of the above paragraphs recognise the importance of retaining the local village. The Dublin Bus Corridor will destroy the village completely.

## Conclusion

I urge to take on board the objections and ask NTA to go back to the drawing board. A plan is needed that will take more cars off the road while at the same time, taking into accounts the needs of people with different abilities and mobility, while also aiming to preserve the historic nature of the area, and allowing local villages to continue to be viable for the communities.

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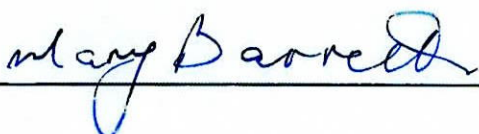
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