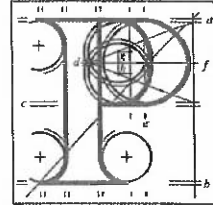


Our Case Number: ABP-316272-23



An
Bord
Pleanála

Jim O'Callaghan TD
Dail Eireann
Leinster House
Kildare Street
Dublin 2

Date: 26 July 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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Jim O'Callaghan TD
DUBLIN BAY SOUTH

An Bord Pleanála,
Strategic Infrastructure Division,
64 Marlborough Street,
Dublin 1.
D01 V902

AN BORD PLEANÁLA	
LDG-	065179-23
ABF-	316272-23
19 JUL 2023	
Fee: €	50
Type:	CHQ
Time:	
By:	post

19 July 2023

Re: Templeogue/Rathfarnham City Centre Core Bus Corridor Scheme.

Dear Sir/Madam,

I wish to make a submission in respect of the planning application submitted to An Bord Pleanála (“the Board”) by the National Transport Authority (“NTA”) in respect of the proposed BusConnects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme. I attach submission fee of €50.00.

Preliminary

In considering this application the Board should weigh up the benefits of this proposed Bus Corridor for the people of Dublin against any detrimental impact it may have in the local area and throughout the city of Dublin. In carrying out this balancing act the Board should take into account both legal and planning objectives. Like many large infrastructural projects that have been on the agenda for more than five years, BusConnects is a project that is still passionately being pursued by the NTA notwithstanding significant changes that have taken place in recent years. The initial objective of BusConnects was to make the bus system in Dublin more effective, expedite bus journey times from suburban Dublin into the City Centre and improve cycling infrastructure through the establishment of segregated cycle lanes.

The proposal submitted to the Board for the Templeogue/Rathfarnham Core Bus Corridor appears to suggest that bus journey times will be reduced by no more than five minutes if all the changes proposed in the planning application were granted. The Board needs to assess whether the significant infrastructural development that is proposed is proportionate and appropriate for the purpose of achieving what is a modest gain, namely speeding up bus journey time by five minutes. The Board also needs to take into account that there is a significant need for improved cycling infrastructure in the city but this could be achieved without extending the size of the roads as proposed in the planning application under consideration.

The likely consequence of increasing the size of the busy thoroughfares is that more traffic will be generated with a consequent increase in emissions. In fact, this increase in traffic appears to have been accepted by the NTA in its planning application.

Dáil Éireann,
Leinster House,
Kildare Street. Dublin 2.
Tel: 01 618 3134

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📍 @OCallaghanJim
👤 Jim O'Callaghan TD
📞 Jim O'Callaghan TD

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In weighing up the proposal the Board needs to keep at the forefront of its mind that the principal objective of the application is to expedite bus journeys by approximately five minutes. That needs to be balanced against the potential detrimental impact that the proposal will cause. As has been outlined already, wider and larger thoroughfares will result in increased vehicular traffic giving rise to increased carbon emissions. It will also result in greater noise, loss of trees, the unnecessary compulsory purchase of properties and inconvenience to many communities by limiting people's ability to access their homes in the most efficient manner.

The total cost of the BusConnects project at €2 billion also needs to be considered when assessing that this is all for the purpose of trying to expedite marginally bus journey times. Also, the fact that all the bus corridors will need to be reviewed by 2040 should emphasise the questionability of such a large investment in what can only be described as a short-term project.

Trees

I am concerned about the lack of adequate consideration given to the removal of garden and street trees and shrubs. No proposals are set out as to how mature trees will be replaced, with the consequent diminution on the ability of trees to absorb carbon.

Bus Gates

The Bus Gate at St. Mary's College on Lower Rathmines Road will be a significant inconvenience to students being dropped off at school at St. Mary's College. Also, persons living in Grove Park Rathmines, particularly elderly persons, will be significantly inconvenienced as cars will not be able to access Grove Park from Rathmines Road on a constant basis. Parishioners attending the Church of Mary Immaculate Refuge of Sinners in Rathmines will find it very difficult to attend their place of worship because of the proposed Bus Gate.

The Bus Gate on the eastern side of Templeogue Road as it enters into Terenure Village will grossly inconvenience the people living in Olney Crescent/Olney Grove and Fergus Road who no longer will be able to turn left and right, respectively, to access Terenure Village.

Compulsory Purchase of Properties on Rathfarnham Road and Terenure Road East

It is perfectly feasible to include segregated cycling lanes on the Rathfarnham Road and Terenure Road East without removing people's property. The enlargement of these roads will simply encourage more vehicular traffic, thereby undermining the whole objective of the BusConnects Scheme which is to get people out of their cars and on to buses or bicycles.

Urban Villages

The villages of Terenure, Rathgar and Rathmines will be changed and, in my opinion, damaged if this application is granted as sought. It will result in those historic villages becoming predominantly thoroughfares into the centre of town. The impact that the project is having on these urban villages is a matter that must be considered by the Board as no consideration has been given to it by the applicant.

Highfield Road

The application seeks to alter the junction at Highfield Road and Rathmines Road Upper by introducing a right turn from Rathmines Road Upper to Highfield Road. This right turn is required in order to facilitate outbound general traffic, primarily with a destination on Rathgar Road, due to the proposal to make Rathgar Road one-way inbound for general traffic. This will have a very significant detrimental impact on Highfield Road and will increase traffic on that road enormously. It does not have the capacity to accommodate such a significant increase by transferring all outbound traffic from the Rathgar Road to Rathmines Road Upper.

Oral Hearing

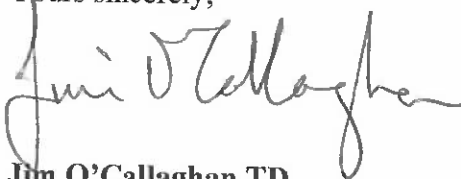
I believe that pursuant to Section 218 of the Planning and Development Act 2000 (as amended) the Bord should hold an oral hearing in respect of the widespread Compulsory Purchase Orders that have been proposed. Similarly, in respect of the planning application for the Rathfarnham/Tempoogue to City Centre Corridor there should also be a oral hearing.

Finally, it is very difficult to assess the general impact of the BusConnects Scheme when individual applications for bus corridors are being submitted on a piecemeal basis, thereby denying the Board the opportunity of taking into account the combined impact that the individual projects will have on the area.

Conclusion

Speeding up public transport and improving cycling facilities are two commendable planning objectives that I support. However, the proposals outlined in the BusConnects project are disproportionate and unnecessary in order to achieve these dual objectives. The costs involved will greatly outweigh the benefits that may be achieved.

Yours sincerely,



Jim O'Callaghan TD