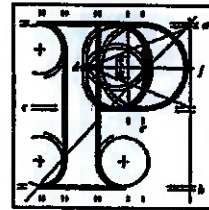


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

John Shanahan
10 Domville Road
Templeogue
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

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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1 Introduction

Project name: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

Location: Dublin

ABP case reference number: HA29N.316272

To whom it may concern,

There are several issues on which I have included observations and I would be grateful if ABP consider these when reviewing the application.

2 General Observations

2.1 Users & Design Vehicles

The Busconnects Preliminary Design Guidance Booklet does not directly address disabled people who cycle, and some of the details within it appear unfavourable to users of adapted cycles.

The scheme should be designed to be inclusive of running chairs and adapted cycles including tandems, wheelchair cycles, handcycles, trikes, Cycling Without Age trishaws and cargo bikes. These types of chairs and cycles are already used around Section 1 (and further along the route).

I ask that ABP consider disabled users of the cycling infrastructure when reviewing the planning application, in particular the details around cycle parking, bus stops, narrow cycle tracks, and space and turns at junctions.



Figure 1 A Van Raam wheelchair cycle and a Hoyt Blade Racer Running Chair

2.2 DMURS

DMURS is a mandatory document for this scheme and the plans should be consistent with it. There are numerous occasions where they are not, e.g., at some signalised junctions, cycle lane provided instead of a segregated cycle track (Templeogue Village), parking inside cycle lanes (Templeogue Village) and walking and cycling not adequately prioritised. The Quality Audit falls short of identifying these issues.

Circular RW 6/2013 outlines in the case where alternative standards are proposed then written approval shall be obtained from the relevant sanctioning authority – written approval has not been included.

Given the NTA are a statutory authority, their approach to DMURS could set a poor precedent for private developers to follow.

2.3 Road Widths & Crossings

General traffic lanes are shown on the typical sections up to 3.6m wide. These lanes widths are more in line with the motorway and dual carriageways lane widths specified in TII publication *Cross Sections and Headroom* (DN-GEO-03036) which not the applicable standard. Lane widths should be in accordance with DMURS (refer above). Reduced lane widths would also reduce the total paved area (thereby reducing run-off) and reduce future pavement maintenance costs. Excess space should be assigned to the footpaths, cycle tracks or the provision of green verges. Where at all feasible, green buffer space should be provided between the cycle track and the road to increase comfort.

Separating cycle tracks and footpath crossings from general traffic lanes could help to reduce road crossing widths and delays, as the ped/cycle crossings can be run on a different cycle to the main junction. This principle is used in the Busconnects Junction Type 4 and the principle should be utilised more widely in the scheme at crossings and junctions where feasible. Reducing the visible cross-section would also help to reduce driver speed.

The benefits of this approach are that the distances pedestrians must cross in one go are reduced and additional junction time can be saved, This additional time can be used for bus or motor traffic or for additional pedestrian/cycle crossing opportunities – which means less waiting and delay. I encourage ABP to visit the excellent SDCC N81 scheme in Tallaght (refer below) to experience the improvements this approach can bring and then to compare it to a Busconnects type crossing at Ballyboden St. Enda's clubhouse on the Firhouse Rd. (visit on Saturday afternoon when children must scramble to get across).

Locations:

N81 crossing: <https://goo.gl/maps/LxCo6HyetbuHmwMi6>

Firhouse Road crossing: <https://goo.gl/maps/YzRGuy6VpnrDChGbA>

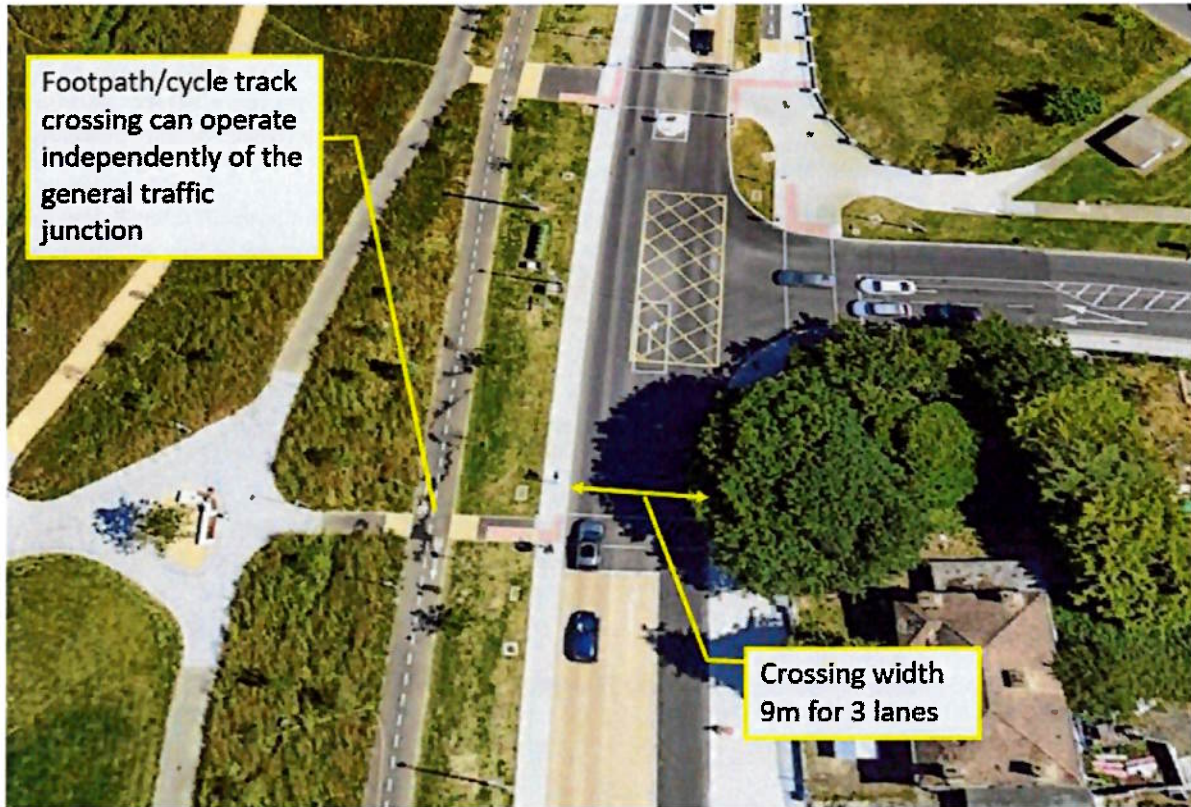


Figure 2 The excellent SDCC N81 scheme in Tallaght with reduced crossing distances and green buffer to the cycle tracks



Figure 3 Poor crossing facilities such as this one on the Firhouse Road outside Ballyboden St. Enda's Clubhouse will be replicated by Busconnects

2.4 Traffic Calming

It is notable that the traffic calming measures used in the cycle tracks (e.g., rumble strips, ramps, chicanes and narrowing) are missing from the motor traffic lanes throughout the scheme. Evidence suggests cycle traffic is not a significant hazard for people walking, with the overwhelming majority of pedestrian fatalities and injuries caused by motor vehicles.

This is a very inconsistent approach. For example, there is a bus stop adjacent to Rathdown Drive (near Bushy Park) and it is an "island bus stop" as it is surrounded by roads. But none of the traffic calming measures are included at the rear of the bus stop because there will be motor traffic.

Some of the traffic calming measures reserved for use in the cycle tracks can have a detrimental effect on some users, such as those who suffer with arthritis or chronic pain (rumble strips) or those who use adapted cycles (tight geometry and cycle tracks that are too narrow).

2.5 Bus Stop Review

The Bus Stop Review should be updated to include the "Proposed Distance to previous stop" for all stops along the routes, as only the current distance is tabulated.

2.6 Road Safety Audit

The Road Safety Audit has not been updated to reflect the latest junction layouts, e.g., Spawell Junction.

2.7 Parking Report

No parking assessment for Section 1 has been completed even though there is on street parking. The reason given for no assessment is there is no on-street parking. This is incorrect, there is on street parking along the scheme in Templeogue village. Also, the fact there is no parking can be an issue too, e.g., lack of disabled parking or loading bays.

2.8 Key Junctions

2.8.1 Walking/Cycling Connectivity & Section 1 Key Junctions

The Dodder and M50 Motorway form significant barriers to active travel in this part of the city. Figure 4 shows the Dodder and M50 with four Section 1 Key Junctions highlighted in yellow. Recently SDCC/NTA have completed some off-road greenway bridges, these are marked in blue circles. While they are a significant help to active travel, it is imperative on road facilities are also provided.

Between the Old Mill (Tallaght) and Terenure Village (~6.2km) if you want to cycle across the Dodder River on-road you must use one of these 4 key junctions. It is critically important for active travel that these junctions prioritise walking and cycling, not just along the Busconnects routes, but across them. Access across these junctions will also be key to accessing the Kimmage Busconnects route from areas such as Rathfarnham, Ballyboden, Knocklyon and Firhouse, and to access the Dodder Greenway.

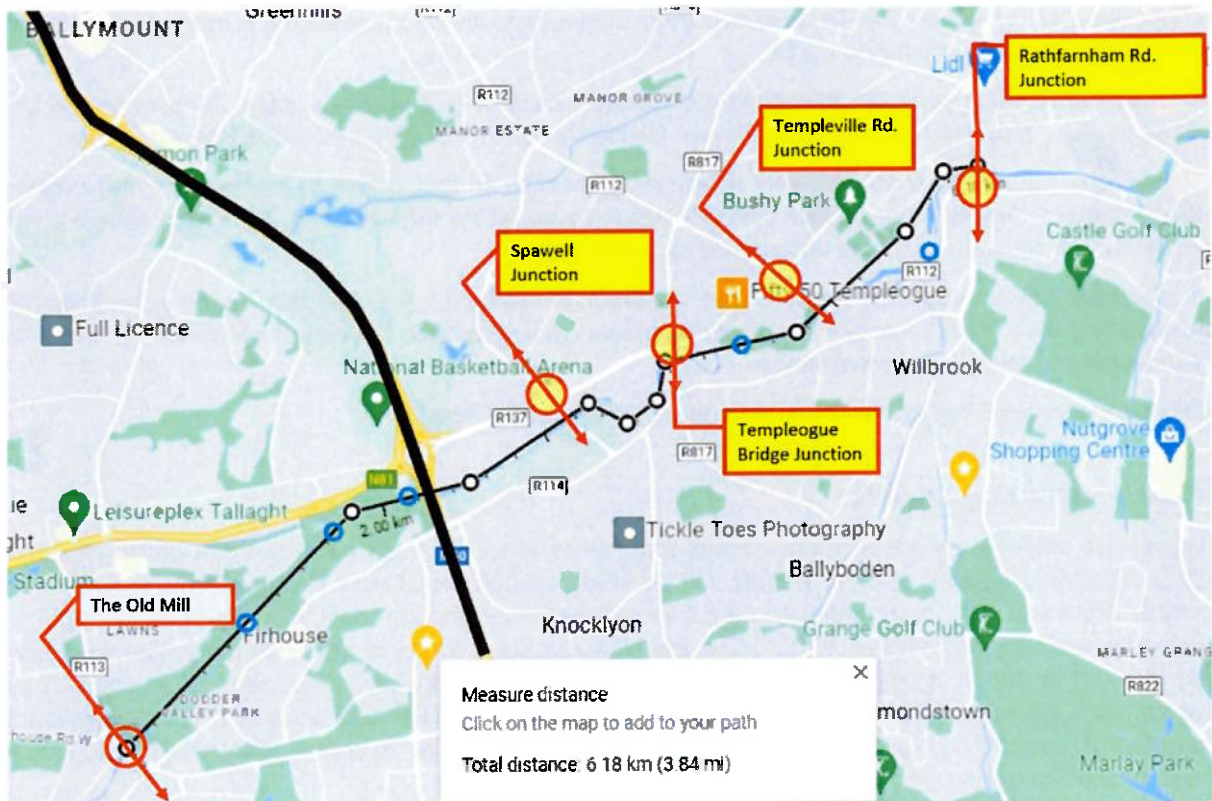


Figure 4 The Dodder and M50 form barriers to active travel & the Busconnects Section 1 Key Junctions are critical to providing access across them

2.8.2 Walking & Cycling Provision at Signalised Junctions

2.8.2.1 Walking & Cycling Crossings

Pedestrian and cycling crossing facilities should be included on all arms of signalised junctions.

Some junctions do not do so, for example:

- Templeogue Bridge – no pedestrian crossing provided on the western arm.
- No cycling facility provided to turn right from Terenure Place onto Terenure Rd. West.

The proposals should not downgrade the walking or cycling movement options at junctions, however in some cases they do, for example:

- Spawell Junction, Templeogue Bridge and Templeville Road junctions all currently provide they option of two-way road crossing but that will be removed.

2.8.2.2 Overall Junction Cycle Times

The Junction Design Report indicates the overall junction cycle time is up to 150 seconds for motor vehicles at the Section 1 junctions. The Traffic Signs Manual (Section 10.2, page 149) states:

“Cycle times in excess of 120 seconds are not recommended as drivers and pedestrians can get frustrated with delays and can be tempted to take risks. Shorter cycle times (90 seconds or less) should be provided in urban areas in order to minimise delays to pedestrians, cyclists and vehicles.”

Furthermore, in many cases the overall cycle time for pedestrians and cycling will exceed the cycle times described by the developer for private motor vehicles. The Developer should be conditioned to

either reduce the overall cycle times to maximum 90 seconds and/or increase the number of pedestrian and cycling stages per junction cycle.

The NTA are basing some of their protected junction designs (e.g., NTA Junction Type 4) on the UK Cyclops, e.g., Spawell Junction. The relevant UK design guidance LTN 1/20 (10.6.24) states that:

“The overall cycle time should be kept as short as possible so that delays to pedestrians and cyclists are minimised. Allowing the pedestrian/cycle stage to run more than once in the overall signal cycle would further reduce wait times and should be considered.”

It is unclear how the pedestrian/cycle light will function on the Type 4 Junction, and it potentially will have an adverse effect on cycling and lead to people cycling missing the opportunity to cross, which in turn leading to much longer wait times.

Proposed junctions cycles times are also not consistent with DMURS.

2.8.2.3 Crossing Speeds

Pedestrian crossing speeds of 1.2 m/s are proposed however research has shown that walking speeds for a significant number of older people will be below this [Amber Cross Code – Walking speeds in middle-aged and older Irish adults and the implications for pedestrian traffic signals, Orna Donoghue, Rose Anne Kenny- November 2015]. Have the NTA assessed the user profile to determine who may be affected by assuming higher crossing speeds? This will be especially important, as in some case pedestrians are required to walk across up to 8 lanes to cross one arm of a junction and a significant number of people may run out of time mid-crossing. This would be extremely dangerous, is unequal and will lead to a reduction in pedestrian users.

It is not clear what cycling crossing speeds are assumed for the various junctions. These speeds will vary depending on gradients at each junction, and the numerous stop lines imposed on the cycle tracks. A full assessment should be provided for each junction.

2.8.2.4 Junction Times & Stages for Active Travel

Inadequate time has been provided for pedestrians to cross even one arm of some junctions, e.g. even faster pedestrians crossing the western arm of Spawell Junction will run out of time during the crossing. This issue has also been flagged generally in the Road Safety Audit.

It is not clear what cycling movements can be completed within the allotted time as it has not been clearly provided, the focus is on general motor traffic. A full assessment of cycling movements should be provided for each junction demonstrating what movements can be achieved and how it compares to the existing scenario.

The report doesn't analyse the cycle or pedestrian traffic delay duration, which often exceeds motor vehicle delay due to the NTA's design.

The NTA are basing some of their protected junction designs (e.g., Junction Type 4) on UK Cyclops protected junctions which have a cycling and pedestrian only stage, e.g., Spawell Junction. UK design guidance LTN 1/20 states that for a cycling and pedestrian only stage:

“The duration of the cycle and pedestrian stage should at least be the time taken for a pedestrian to cross the longest arm and preferably the time required for a cyclist to make the longest right turn movement.” (10.6.24)

Clearing some junctions by walking or cycling will take significantly longer to complete than by driving a private motor vehicle. It could take >>1 junction cycle to clear a junction by foot or cycling but only one cycle to clear it by car. For example,

- the Spawell junction can be cleared in 1 cycle by car but may take close to 3 junction cycles by foot (~6.5 minutes to clear the junction diagonally).
- Providing an incoherent, deprioritised, and unsafe solution for cycling, e.g., travelling south from Cypress Grove Rd through Templeogue Bridge to Old Bridge Road.

2.8.2.5 Stacking Areas

Generally, inadequate space has been provided for stacking of cycle traffic at junctions, especially when cargo bikes, trikes, tandem, wheelchair cycles and other adapted cycles are considered.

2.8.2.6 Summary - Walking & Cycling at Signalised Junctions

The NTA has produced large junctions with long cycle times, sometimes complex incoherent crossings for cycling and limited opportunities for crossing that deprioritise people walking and cycling and create long delays for them, and longer than if they were to drive a private car. This directly affects the quality of service of the offered cycling and walking routes. It will introduce additional safety issues for people cycling and walking as they will not always wait and will look to cross multi-lane roads during their red-light phases. These points were ignored as criteria by the NTA's EIAR effects analysis, refer to section 2.9 of this submission.

A lot of detailed traffic analysis and modelling has been completed however it is heavily skewed in assessing the delays and flows of private motor vehicles. A very simple measure to assess cycling and walking provision at a particular junction is "will it take me longer to walk or cycle through the junction than drive through it?", by this measure the Developer's proposals often fail.

The Developer should complete a walking and cycling assessment for each junction along the scheme, using the LTN 1/20 Junction Assessment Tool.

2.9 EIAR Chapter 6 - Traffic & Transport

2.9.1 Cycling Baseline Description

The baseline environment description of the existing cycling infrastructure (EIAR 6.3.2.2) is incomplete. The existing infrastructure not listed includes:

- toucan crossings at each arm of Spawell Roundabout, allowing two-way cycle crossings.
- The two-way cycle track on the north side of the R137 does not only connect to St Michael's House. It provides a key link to the greenway path into Rossmore estate, linking to the wider residential areas and local amenities such as the primary schools, church and shops.
- toucan crossings at two arms of the Templeogue Bridge junction, allowing two-way cycle crossings. There is also shared space footpaths at the toucan crossings, over the bridge and connecting to a third toucan crossing just south of the bridge on Old Bridge Road. The shared space allows for cycle crossings of the southern arm of the junction and enables crossing the junction to access the Dodder Greenway at Butterfield Avenue.
- There is shared space along both footpaths between Templeogue Bridge and Templeogue Village. There used to be red asphalt cycle tracks on the footpaths however this was removed a few years ago to create the shared space, but the outline of the cycle track can still be seen on the footpath.
- The description in Templeogue Village is inaccurate, the northernmost cycle lane is on road with no kerb protection and located adjacent to the general lanes while also being in the reverse zone of parked vehicles. The southern cycle track is also driven along and reversed over to access/exit parking.

There are also numerous inaccuracies and inconsistencies in the drawings in Figure 6.4a for Section 1, between the drawings and reality, and between the drawings and the written description. In some cases, the written description and the drawings do not align with each other, or they don't reflect the actual infrastructure. Examples include the road between Templeogue Bridge to Springfield Avenue, Rathdown Drive.

There is also a notable inconsistency in how the pedestrian and cycling existing infrastructure is presented in the EIAR. The existing provision for cycling at junctions and crossings is not described in the baseline for cycling. This is important in the context of junctions as it does not allow a full assessment of the proposed versus existing cycling provision and in some cases allows the developer to present

the proposals as bringing improvements which were either already there or provided a better level of service than the Busconnects proposals.

2.9.2 Cycling Assessment - Proposed v Existing (6.4.6.1.2.2)

The cycling Assessment is incomplete. Table 6.24 omit significant lengths of Section 1, for example the M50 junction to Cheeverstown House, Cypress Grove to east of Templeogue Village. The key junctions - Spawell, Cypress Grove, Springfield Avenue are not assessed individually for cycling yet they are for other modes.

The Developer's proposals sometimes downgrade the existing cycling provisions, particularly at junctions which have been omitted from the assessment.

2.9.3 Cycling Assessment

Table 6.24: Section 1 – Cycling Impact during Operational Phase does not assess the junctions. Individual junction assessments should be completed for cycling and walking, for example using the tool in LTN 1/20.

2.9.4 Chapter 6 Cycling Assessment Summary

An important step of the project development process should have been to clearly identify the existing cycling infrastructure (this is incorrect in the documents), identify the strengths and weaknesses, propose measures that build on the strengths and address the weaknesses, demonstrate the process and show clearly how the proposals improve the level of service for cycling along the route. The proposals and assessment do not do this.

Also, people walking and cycling are sometimes segregated by space (e.g., a segregated cycle track) and sometimes by time (e.g., the junctions or a toucan crossing). The NTA's assessment does not adequately assess time for walking and cycling (e.g., excessive delay at junctions). Individual junction assessments should be completed for cycling and walking using the tool in LTN 1/20.

2.10 Drainage

For ease of reference, the following figure lists the drainage catchments near Templeogue with the correct chainages, as the design information is often unclear and incorrect.

Existing Catchment Reference	Chainage
Catchment 15	J1429 - J1550
Templeogue Village Catchment	J1550 - J2116
Catchment 16	J2116 - J2200
Catchment 17	J2200 - J2717

Figure 5 Drainage Catchments and their chainages

There are a series of inaccuracies and errors included the planning documents relating to the drainage and catchments, please refer to the following table.

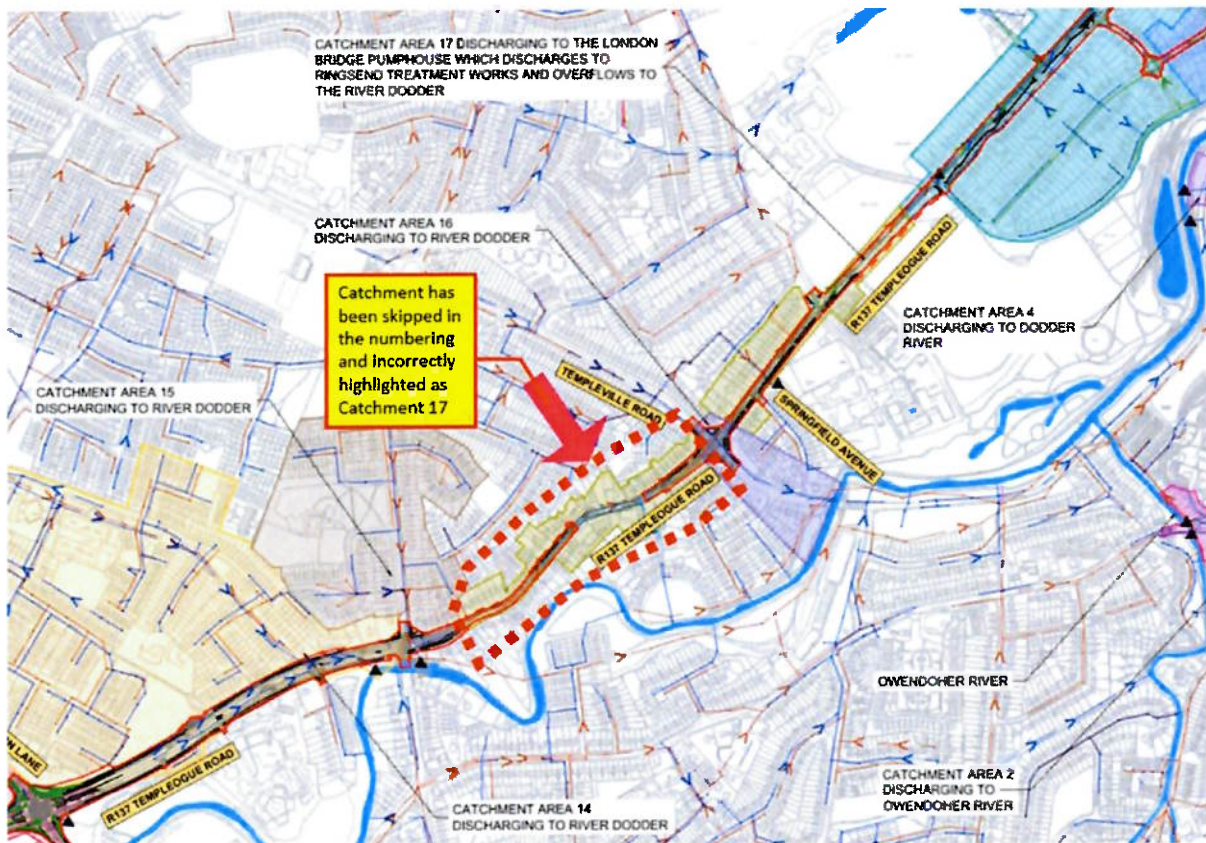


Figure 6 Extract from the drainage drawings showing the omitted Templeogue Village Catchment

Table 1 Issues relating to drainage

Preliminary Design Report		
Reference:	Issue:	Comment:
9.3 Existing Drainage Description	"There are no SuDS/attenuation measures on the existing drainage networks to treat or attenuate runoff from the existing highway."	This is not correct. There are existing attenuation tanks in Templeogue Village which were previously installed during the works completed in 2022. These tanks are marked as future works on the drainage drawings.
Overall Catchment Areas (Sheet 1 of 3), Proposed Drainage Drawings	On the drawings the catchment between Cypress Grove Rd. and Templeville Road (including Templeogue Village) has been skipped in the numbering and incorrectly highlighted as being part of Catchment 17. Also, the Templeogue Village Catchment discharge into the River Dodder is not indicated on the drawings.	The drawing presentation is incorrect. The Templeogue Village Catchment should be numbered and highlighted as its own catchment, which discharges to the River Dodder through the attenuation tanks referenced above. Catchment 17 discharges through a pumphouse to Ringsend Treatment Works. There are additional impermeable areas within the Templeogue Catchment which discharge to these attenuation tanks.
Table 9.2: Summary of Existing Catchments	The Templeogue Village Catchment (chainage J1550 to J2115) has been omitted from the table. It has incorrectly been listed under Catchment 17 and the discharge	The Templeogue Village Catchment should be numbered, and the discharge accurately described. It does not discharge to a treatment plant, but rather through the Templeogue Village

Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

	incorrectly described as being to a water treatment works.	Attenuation Tanks which were constructed before the environmental assessments were completed.
Table 9.3: Summary of Increased Permeable and Impermeable areas	The Templeogue Village Catchment (chainage J1550 to J2116) and associated increase in impermeable areas has been omitted from the table	There are additional impermeable areas on both sides of Templeogue Village which will drain into the Templeogue Village Catchment, flow into the existing attenuation tanks and discharge to the River Dodder at Riverside Cottages. The TV Catchment is omitted, and these additional impermeable areas are not correctly listed in the table.
Table 9.4: Summary of Proposed Surface Water Infrastructure	This is the first table that the TV Catchment is (partially) referred to, and it is incorrectly referred to as Catchment 17. The chainages describing the proposed drainage infrastructure extend through Templeogue Village, however this is outside the proposed red line boundary.	It is claimed the existing attenuation scheme was designed and constructed to accommodate the proposed Busconnects discharge. This infrastructure was constructed in advance of any environmental assessment or screening being completed.
Table 9.5: Summary of Proposed Attenuation Features, SuDS & Outfalls	The Templeogue Village Catchment (chainage J1550 to J2116) has again been omitted from the table "J2149 to J2200 (left)" is called up as Catchment 17 but it is Catchment 16.	The existing Templeogue Village Attenuation Tanks, which it is claimed have been designed to accommodate the proposed Busconnects discharge, have been omitted from the table.
Appendix B11 - Proposed Surface Water Drainage Works, Sheets 32 and 33	The Templeogue Village drainage network and attenuation tanks are indicated as planned infrastructure.	The scheme drainage network and attenuation tanks have already been constructed by SDCC, in advance of any environmental screening or assessment.
Appropriate Assessment Report – Screening Report		
Reference:	Issue:	Comment:
Section 3.1.3 Surface Water Drainage Infrastructure	"The surface water drainage system for the Proposed Scheme will discharge to 18 catchment areas..." There are 19 catchment areas when the Templeogue Village Catchment is considered.	Templeogue Village Catchment has been incorrectly called Catchment 17 (which discharges to a water treatment plant), and it will discharge to the Dodder River.
Table 9: Projects Considered for the In Combination Assessment	The Templeogue Village works are not included	Templeogue Village is an integral part of the scheme
NIS		
Reference:	Issue:	Comment:
1 Introduction	"It considers the implications of the Proposed Scheme, on its own and in combination with other plans or projects" "This NIS assesses the final Proposed Scheme design."	The Templeogue Village drainage catchment and mitigation measures are not correctly referenced throughout, refer points below. With reference to 9.1, the Templeogue Village project has not been included as an in-combination project.

Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

		Significant errors and discrepancies are outlined in the proposed scheme drainage design in the previous points.
3.3 Surface Water Drainage Infrastructure	18 catchment areas are referred to but there are 19 catchment areas when the Templeogue Village Catchment is considered.	The attenuation tanks are not referenced.
Appendix II - Proposed Surface Water Drainage Works	The Templeogue Village attenuation tanks are indicated as planned infrastructure, but they have already been built.	The attenuation tanks have already been constructed, in advance of any environmental screening or assessment.
7.1.4 Mitigation Measures Measures to Protect Surface Water Quality during Operation	The Templeogue Village attenuation tanks are not referenced.	
9.1 Analysis of Potential In-Combination Effects	The Templeogue Village works are not included	Templeogue Village is an integral part of the scheme
EIAR		
Reference:	Issue:	Comment:
13.3.8 Existing Drainage Table 13.10 Existing Drainage	The EIAR desk study found “....no treatment or attenuation within the network. No SuDS were identified within the study area.” The Templeogue Village Catchment (chainage J1550 to J2115) has been omitted from the table.	The Templeogue village attenuation tanks have already been constructed, in advance of any environmental screening or assessment. The Templeogue Village Catchment should be numbered, and the discharge accurately described. The EIAR does not include a full and accurate description of the catchments or existing drainage infrastructure which is being relied on up as a mitigation measure in the proposed scheme.
13.4.5.2 Assessment of Predicted Impacts – Surface Water Runoff & 13.5 Mitigation and Monitoring Measures	The Templeogue Village attenuation tanks are not referenced.	

The existing and proposed drainage network in the Templeogue Village Catchment is relatively simple in concept but has proven difficult to address in the documents. However, it discharges into the Dodder River and “the Appropriate Assessment screening report concluded that there is the possibility for significant effects on European sites to arise, either from the Proposed Scheme alone or in combination with other plans and projects” (NIS). Can ABP please consider these points when completing their assessment.

3 Other Route Observations

3.1 M50 to Spawell to Cypress Grove Rd. (Sheets 29)

A footpath and segregated cycle track should be provided along the outbound carriageway to connect the Spawell junction to the businesses, playing pitches, homes and existing footpath/cycle track on the south side of the M50 junction. Currently there is no footpath and people walk in the bus lane.

Many people walk in the bus lane from the bus stop at Spawell junction to the service station, where they are picked up on the way to work. The service station is a meeting spot and also the local 24hr shop, so having a more direct walking and cycling route along the roadway would be preferable to using the circuitous route through the M50 underpasses, which can suffer with anti-social behaviour.

Please condition that a footpath and segregated cycle track be provided along the south side of the R137 linking the Spawell junction to the existing segregated footpath/cycle track at the southern side of the M50 junction.

It is not a good idea to position the inbound left turn lane inside the bus lane approaching the Spawell Junction. It is inevitable that queuing left turning vehicles will block the bus lane at the crossover.

3.2 Spawell Junction (Sheet 30)

The current Spawell roundabout has a number of inherent flaws. There is an imbalance in traffic flow, with higher volumes entering from the M50 arm. This can make joint the roundabout from Wellington Lane difficult. After the roundabout was previously upgraded the Wellington Lane arm was retrofitted with a "fudge", by lengthening the 2nd approach lane and allowing traffic from both lanes to turn right on the roundabout, an unusual arrangement which is inconsistent with the Rules of the Road. The proposal to use traffic signals could potentially allow better traffic management and alleviate the problem of dominant traffic flow.

There are often collisions on the roundabout and the Gardaí also regularly carry out speed checks on traffic approaching from the M50. However, the proposals do not include any engineering measures to reduce speeds along the dual carriageway. The Busconnects proposals may exacerbate the speeding issue by adding another 2 inbound and outbound lanes. Why are an additional 2 inbound lanes being proposed at the Spawell junction when the NTA are reducing inbound traffic volumes further along the road?

The existing toucan crossings are excessively slow for pedestrians and cyclists. There are numerous beg buttons which can take a long time to change to green. It can take a long time to pass through the junction. It can also be very dangerous crossing multiple adjacent traffic lanes, often with speeding traffic on approach here. The NTA's proposals will exacerbate this issue by adding an additional 2 inbound lanes which will result in a pedestrian or person cycling having to cross 8 traffic lanes just to cross the road, and 5 adjacent lanes in one go. If possible, the number of lanes to be crossed should be reduced. Removing the excessively sweeping bends before the toucan crossings would be a significant safety improvement.

Pedestrian/cycling wait times and crossing distances should be minimised and time allocation should prioritise sustainable modes of travel. Two-way cycling traffic should be provided for around all arms of the junction to reduce the number of crossings required to cross the road. The current junction allows two-way cycle traffic at each arm.

It is imperative that active travel is given a high priority, as this junction is the only on-road link for walking and cycling for nearly 4km, between the Old Mill and Cypress Grove. Crossing the proposed junction diagonally by foot will take up to ~6.5 minutes (due to the signal staging).

If it is not possible to reduce the number of lanes and reduce the pedestrian and cycling junction cycle times, then perhaps an active travel overbridge would be a better solution. An example would be the Hovenring in the Netherlands.



Figure 7 The Hovenring could provide a good solution for all modes at the Spawell Junction



Figure 8 Spawell Junction is the only on-road walking and cycling crossing for ~4km of the Dodder River

3.3 Spawell Junction to Cypress Grove Rd. (Sheets 30-31)

The existing two-way cycle track between the Rossmore greenway and Spawell should be retained. The route currently serves residential areas, the primary schools and other local amenities well. Busconnects proposes to downgrade it to a one-way track. By removing the existing two-way cycling track people will have to travel longer and cross large roads numerous times in order to connect to the Wellington Lane cycle track or the Tallaght cycle track at Spawell, refer figure below.

The key pedestrian and cycling entrance to Templeogue Wood should also be retained. Busconnects appears to ignore it. The two-way cycle track should be extended from the toucan crossing outside Cheeverstown House to the pedestrian/cycling access into Templeogue Wood. Without a two-way track, people cycling from Templeogue Wood will have to travel ~700m longer and cross 4 extra roads to connect to Wellington Lane or the cycle track at Spawell (see below).

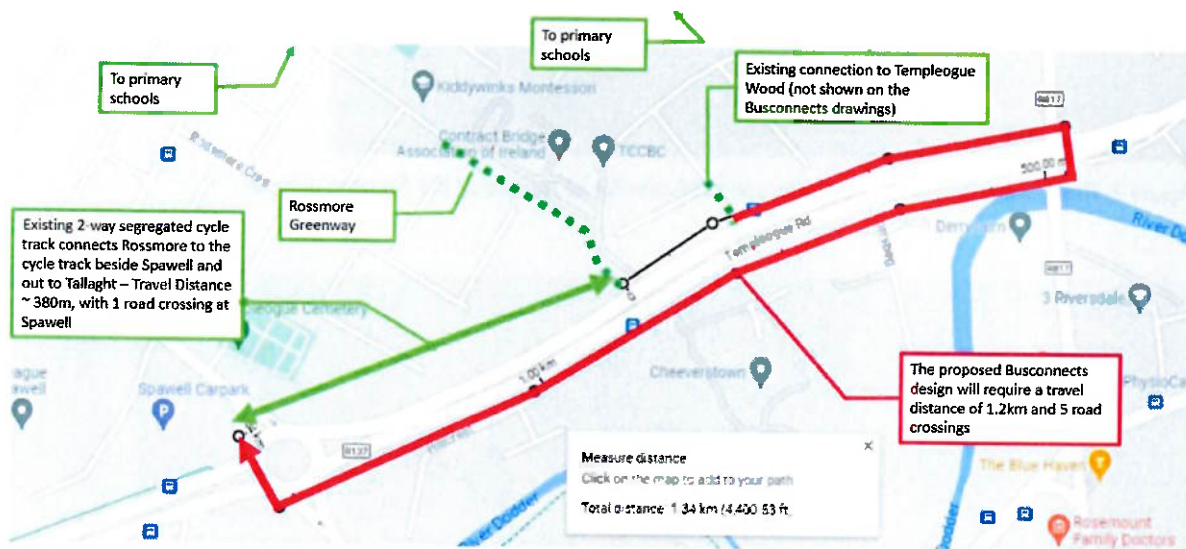


Figure 9 Busconnects proposals will needlessly downgrade some good existing cycling infrastructure

The upgrades at Templeogue Arch are welcome but a footpath should remain on the roadside of the arch. Some people will not be comfortable walking behind the structure for personal safety reasons.

A raised table at Cheeverstown House toucan crossing should be provided to slow traffic on approach and provide greater comfort and priority to people using the toucan crossing. There is no need for a chicane within the toucan crossing median and it should be removed in line with DMURS. A significant number of wheelchair users and their carers use this crossing.

Unfortunately, there have been serious collisions on the R137, yet no traffic calming measures are proposed. Traffic calming measures should be provided as part of the scheme. Sadly, Mrs Maria Verdida was struck and killed at the Cheeverstown toucan crossing (irishexaminer.com).

There is no provision for cycling to/from Hilcrest housing estate or Corrybeg Avenue from the inbound cycle track. People cycling must cross up to 8 lanes of traffic unaided to access/exit Corrybeg Avenue.

This section of road should be designed with two-way cycle tracks on both sides of the road between Spawell and Cypress Grove. Two-way crossings should also be provided at the major junctions at either end of the road. This would provide better access and permeability for residents and people traveling to/from Cheeverstown House, St Michael's House, Hillcrest, Corrybeg, Rossmore, Templeogue Wood, Domville and other adjacent residential areas.

3.4 Templeogue Bridge Junction (Sheet 32)

3.4.1 Pedestrian Crossings

A pedestrian crossing should be provided on the western arm of the junction. This is an important link between residential areas and the Dodder Greenway.

3.4.2 Provision for Cycling

The junction design does not prioritise cycling and is incoherent. There will be extended wait times to pass through the junction and it will take longer to navigate the junction by cycling than it will driving. There are multiple stop lines and light sequences to navigate even for simple cycle movements. For example, cycling south from Cypress Grove onto Old Bridge Road to connect to the Dodder Greenway will be downgraded. It will take longer than the current arrangement, and when you do clear the junction, people cycling will be in danger of being left hooked on Old Bridge Road by turning traffic from Templeogue Village.

There is no cycling provision on Old Bridge Rd, which is a key connection across the Dodder and to the Dodder Greenway. Neither the Dodder Greenway scheme nor Busconnects corridor adequately consider cycling traffic crossing them or connecting between them.

3.4.3 Bus Stop

The proposed outbound bus stop is relocated from the east to the west of the junction. The proposed location is too far away and disadvantages bus users, most of whom will now have further to walk to access Cypress Grove Road or Old Bridge Rd (where they mostly go). Furthermore, the design of the junction at Templeogue Bridge will not provide people with a pedestrian crossing over the R137, so bus users will have to cross an additional road (in some cases cross 3 roads & 4 beg buttons - Old Bridge Road, Templeogue Road and Cypress Grove Road) to access Cypress Grove Road, which should be one crossing. The design proposals should promote and encourage sustainable travel.

The bus stop placement also reduces options for bus users, as the A1 will turn down Old Bridge Road and stop 1130 will no longer service half of the proposed outbound bus routes. The bus stop placement will also hinder and restrict transfer access between the A1 and A3 spines and the F1 spine. There is no pedestrian crossing provided on the western arm of the major junctions, which would connect transferring passengers. Most passengers alighting at Templeogue Bridge walk up Cypress Grove Road (including to use the pedestrian permeable routes at Cypress Grove North and South). The proposed bus stop placement lengthens their walk from the stop and requires additional road crossings.

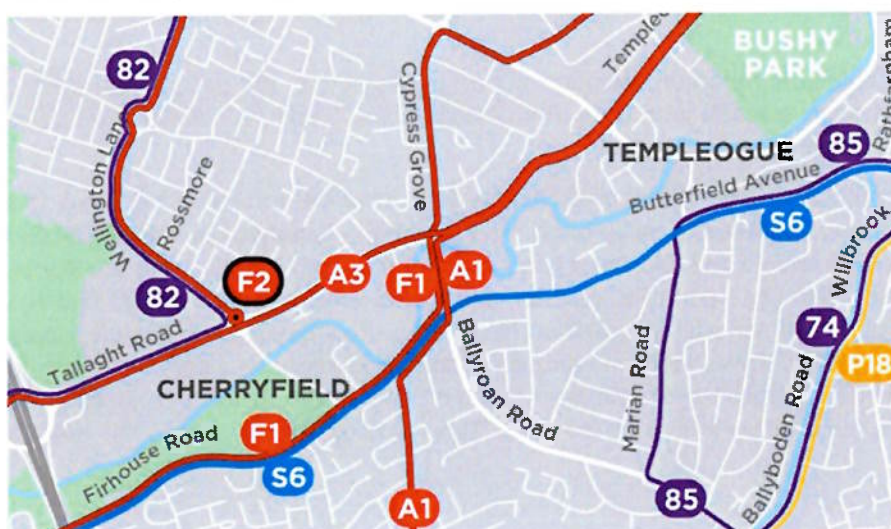


Figure 10 Proposed Busconnects Routes at Templeogue Bridge

The Bus Stop Review report gives the reason for moving the stop as "...aligns with the principle of locating stops after junctions". However, the same document lists "Considerations for Bus Stop Locations" and the considerations generally argue against the move.

Furthermore, the proposed location of stop 1130 lengthens the distance to the previous stop (Templeogue Village) to >600m, well in excess of the stated main principle to achieve a bus stop placing of 400m in suburban locations (Bus Stop Review, Section 5).

In summary, the bus stop placement moves the stop further from the main residential areas, further from the pedestrian crossings, makes it harder to transfer to other buses, and renders the stop unusable by 50% of the (future) outbound bus routes. The placement is also less favourable from a security perspective for parking cycles at the bus stop, as there will be less passive surveillance than at the current location. Templeogue Bridge is close to the Dodder Greenway so would be a good location for cycle park and ride facilities.

Bus stop 1130 should be located at a more favourable location and fitted with appropriate sheltered bike parking. The Bus Stop Review should be updated to include the "Proposed Distance to previous stop" for all stops along the routes, as only the current distance is tabulated.

3.5 Cypress Grove Road to Springfield Avenue (Sheet 32-33)

3.5.1 Consideration of Reasonable Alternatives

Regarding reasonable alternatives considered, an option which properly prioritises walking and cycling was not considered along this road. There should have been an option considered which provided segregated cycle facilities both inbound and outbound over the full length of the road (either a bi-directional cycle track on one side, or tracks on both sides).

Continuing the bi-directional cycle track from Bushy Park/Fortfield through Templeville Rd/Templeogue Village and connected to the existing two-way cycle track outside Rossmore/St. Michaels House should have been considered as an option. There are lengths of road with either no or too narrow cycle tracks proposed, and a bi-directional track could have been a better option given limited space.

The NTA claim they are prioritising people movement along the routes. But their options prioritise stacking of vehicle congestion and bus movements. If they were maximising people movement then in the first instance, they would provide space for pedestrians and then cycling, as both modes can move more people per hour than the other two modes.

Prioritising cycling and walking to a greater degree could be completed largely within the existing road space and would reduce or remove the need to CPO private lands. It would also reduce impermeable paved areas.

The NTA discounted some solutions from consideration in part because they did not provide cycling facilities, however their proposed solution also does not provide cycle tracks. A solution that gives cycling higher priority should have been considered.

Regarding the proposal to move the inbound bus priority lights back toward Cypress Grove Road, this proposal should be revisited and assessed in more detail. The use of the Templeogue Bridge junction itself as the bus priority measure should be considered further, rather than the use of a separate signal. There is no right turning traffic from Old Bridge Rd. (except buses) and left turning traffic from Cypress Grove to Templeogue Village is minimal, with a "hold the left turn" lane proposed which could be used to manage this traffic flow. Cypress Grove junction essentially does not introduce significant traffic to Templeogue Rd, and it should be possible to manage inbound traffic flows at the key junction as opposed to a bus gate a few hundred metres along the road. This could reduce or remove the need to CPO private lands.

3.5.2 Templeogue Village and the TVI Part 8

The TVI Part 8 was a SDCC public realm improvement project and was a prescribed development under the Planning and Development Act 2000 (as amended). The original Part 8 scheme documents are attached in Annex A. It is worth noting:

- June 2007 – the Public Car Park Part 8 consultation was conducted by SDCC
 - [Link to Part 8](#)
- March 2018 – Templeogue Village Initiative (TVI) Part 8 was conducted by SDCC
 - [Link to TVI Part 8](#)
 - The original 2018 Part 8 plans were of limited scope, with no significant changes to the existing village layout.
 - Under the Planning and Development Regulations the NTA were a statutory notifyee.
 - Section 31J of the Planning and Development Act requires that the transport strategy of the NTA be a consideration material to the proper planning and sustainable development of the project. SDCC contacted the NTA, but the NTA did not make a submission to the Part 8.
- July 2018 - The SDCC Chief Executive's Report for the TVI Part 8 approved by councillors. There is no record of SDCC issuing the statutory notifications after the Chief Executive's Report was approved.
- January 2019 – the NTA conducted Busconnects Public Consultation 1.
- September 2019 – the NTA presented a different layout at a community forum meeting.
- January 2020 – the NTA announced Templeogue Village was to be sectioned out of their plans, thus removing it from the Busconnects public consultation process. Note the Busconnects consultation report makes no mention of any request for the TVI and when the NTA were specifically asked for them, they did not produce any written requests for the TVI. 5 submissions in total were made to the original SDCC Part 8 consultation.
- Jan-Apr 2020 - The original TVI Part 8 plans were substantially redesigned post Busconnects public consultation.
 - The new plan involved a significant redesign of the public road corridor through Templeogue Village, including extensive reconfiguration and realignment of cycling infrastructure and on-street parking arrangements. The changes were not included or described in the Chief Executive's TVI Part 8 Report. It was no longer the Part 8.
 - April 2020 – the NTA conducted CBC10 Public Consultation 2, with Templeogue Village removed from the consultation. This is the first time these redesigned plans were seen in public, and they were on the NTA Busconnects drawings. The plans were excluded from the public consultation, as they are now with the ABP submission (including the EIA).
 - This was no longer the TVI Part 8, and will refer to it as the NTA/SDCC Layout.
- July 2020 – SDCC put the NTA/SDCC Layout out to tender for construction. They still called it the TVI Part 8, but it was materially different to the 2018 Part 8 plans. The NTA/SDCC Layout plans put out to tender were similar to what is currently shown on the ABP Busconnects application drawings.

An assessment demonstrating the differences between the NTA/SDCC Layout, and the original Part 8 scheme are included in Annex A. The NTA/SDCC layout is not the Part 8 scheme, and it should not be presented as a consented Part 8 scheme to ABP. The layout on the Busconnects drawings is not previously consented and no environmental assessment or screenings were completed prior to construction.

Given the above, it is difficult not to consider the plans shown on the Busconnects application as the de facto NTA Busconnects design, which has been split from the project and constructed in advance of the ABP planning application and environmental assessments. I ask that ABP consider these points in their review of the application.

The NTA's application documents are generally inconsistent in their approach to Templeogue Village. The TVI is neither listed as a relevant planning project while at the same time is not fully described as part of the planning application (e.g., the Templeogue Village drainage catchment has been omitted).

TV is an integral and fundamental part of the scheme – this applies to the movement of people walking and cycling, parking, access to public transport and the businesses in the Village, as well as to drainage. A holistic approach must be taken to all issues relating to Templeogue Village, from Templeogue Bridge to Templeville Road.

The public road corridor through Templeogue village is an integral part of the proposed scheme and should not be split out. Further to the points above, please also consider that:

- Templeogue Village is the key urban centre on the scheme between the M50 junction and Terenure.
- For the NTA's objectives to be realised, the Village must be considered as part of the scheme.
- Templeogue Village is the key transport hub on the route. The Village bus stops are some of the most used. Bleeper station hire bikes there. People walk and cycle to the Village to access local shops, amenities and bus services, using local laneways and the Dodder Greenway.
- The movement of people walking, cycling and using the bus along the route needs to be considered part of the scheme.
- The proposed traffic management plan and traffic control system through Templeogue Village is an integral part of the Busconnects scheme. In addition to all forms of transport passing through the Village, the bus gates, associated light controls, ducting, cabling and control infrastructure are all required through the Village. Even the inbound bus stop placement is relevant to the control of traffic through the Village, with the NTA proposing to relocate the inbound bus stop further outside the village centre (and it will block the footpath).
- The Templeogue Village drainage network is an integral part of the Busconnects drainage system. The Busconnects project introduces increased hard paved areas between Templeogue Bridge and Templeville Rd. The additional paved areas flow toward Templeogue Village and connect to the drainage network there. Busconnects drainage relies on the Templeogue Village attenuation tanks as a mitigation measure before discharging in the Dodder River.
- The Busconnects drawings also do not fully reflect the current layout in Templeogue Village, and it is not possible to construct the Busconnects proposals without completing works within the Village and outside the Busconnects red line boundaries.

3.5.3 Boundary Lines

Article 22(2)(b)(i) of the Regulations requires the plans to clearly identify the land to which the application relates with the boundaries marked in red. The NTA's own proposed scheme description states that *"the Proposed Scheme is routed via the R137 along Tallaght Road and Templeogue Road, through Templeogue Village, to Terenure Cross, where it joins the Rathfarnham to City Centre section"* (Chapter 4 Section 4.2). The NTA's scheme description describes the public road corridor within Templeogue Village as part of the Proposed Scheme. Site Location Plan Sheet 1 shows Templeogue Village not covered by the red line boundary. General Arrangement Drawings Sheet 33 of 42 shows the red line boundary incompletely. The application scheme written description and drawings appear to be at odds with each other and are inconsistent throughout.

Furthermore, 22(2)(b)(i) requires "any land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application in blue". The land through the Village which is under the control of the NTA and/or SDCC is not marked in blue.

3.5.4 NTA Drawing Presentation

Articles 23/24 requires the NTA to show adjacent infrastructure to the same level of detail as the proposed infrastructure, however they have not in Templeogue Village, for example:

- two sets of pedestrian crossing lights within the Village are omitted. These will be relevant to the proposed bus gates traffic management and control system.
- Drainage omissions
- The layout shown in Templeogue Village is not fully what was built.

- The drawings do not make clear what infrastructure is existing or proposed.
- The footpaths are shown incorrectly, with paths widths shown wider than they are.
- Parklets not shown.
- Street furniture and signs not shown, e.g., bollards, post box which block the footpaths.

3.5.5 Comments on the Presented NTA/SDCC Design

The Design Manual for Urban Roads and Streets (DMURS) is a mandatory design documents for this project and Templeogue Village, as well as the National Cycle Manual (NCM). The plans do not appear to comply with these documents, and a sample of the issues are outlined below.

- DMURS requires minimum footway widths based on the space needed for two wheelchairs to pass each other (1.8m). This is not provided. On the southern side of the village, the layout does not include a suitable footpath in front of the “landings” at the row of shops. The layout also requires motorists accessing the private areas to drive along/over the cycle track, any available footway space and the disabled parking space. This design is unsafe. It is unclear how pedestrians are catered for, including the elderly, children, and people with disabilities. The 2018 Chief Executive's report demonstrates how SDCC previously chose to ignore similar concerns, when they were explicitly raised by a local resident during the 2018 public consultation. On the Busconnects drawings, the grey hatch in Templeogue Village greatly overstates the footpaths widths being provided.
- The existing northern disabled parking space was moved to the south side of the street where there is not a coherent footway connecting to other parts of the village. The new location also requires users to exit directly beside a very busy traffic lane and leaves no public disabled space on the northern side of the village. The disabled parking bay also needs to be driven/reversed over to access the parking spaces in front of the row of shops. The new public car park has placed the two disabled car parking spaces at one of the furthest points from the village.
- No on-street loading bay is provided on the north side of the street.
- On the northern side of the village, the existing off-road cycle tracks have been de-segregated, turned into cycle lanes and moved to the roadside, against the recommendations of DMURS and the NCM. The design has introduced a gauntlet of new hazards and increases risk for people cycling including:
 - the roadside cycle lane is used for pulling in or parking
 - Some exits and parking do not have adequate sightlines
 - The design places people cycling in door zone of parked cars.
 - The bay of “reverse only” spaces does not operate as intended. Human behaviour will dictate that people will use these spaces however they feel most comfortable, including nose-in parking from both lanes. This results in reversing out onto the cycle lane. Even if used as intended, because the carriageway has been narrowed the design requires drivers to drive into the cycle lane, before reversing back across it.
- Cycle lane widths are too narrow and not in accordance with the NCM. Significant additional buffer space is also required where the cycle lane passes a line of parked cars, but it is not provided. Instead, a painted white line is shown to narrow the cycle lane.
- No public bike parking was planned within the village proper, but some has been retrofitted in the leftover space.
- No safe cycling connection to the Dodder Greenway at Riverside Cottages is provided and people cycling need to turn across a multi-lane road (Templeogue Road).



Figure 11 A dedicated on-street loading bay should be provided on the northside of the street



Figure 12 A driver reverses over the disabled parking bay and cycle track (there is no useable footpath) on the south side of the Village, while (without proper sight of approaching traffic) a driver reverses out of the "reverse only" echelon spaces on the north side of the street, crossing the cycle lane and onto the wrong side of the road.

3.6 Terenure

A priority crossing should be provided for walking and cycling across Rathdown Avenue, as both these modes are technically travelling straight along the main road and should have priority over side road traffic.

Terenure Place is a hostile environment to cycle in and Busconnects offers no improvement. With inbound traffic reduced along Templeogue Road it should be possible to manage the outbound traffic in a single lane, and the remaining space reallocated to provide segregated cycle tracks.

A segregated cycle track should be provided on the inbound lane on Rathdown Park where it meets the R114. This would allow people cycling to safely approach the junction when there is congestion at the junction.

Provision needs to be made to ensure people cycling inbound can travel from Rathdown Park and Rathfarnham Road onto Bushy Park Road.

4 Conclusion

Thank you for reading my observations and I would be grateful if you would give them consideration when reviewing the planning application and environmental documents.

John Shanahan

10 Domville Road, Templeogue, Dublin 6W

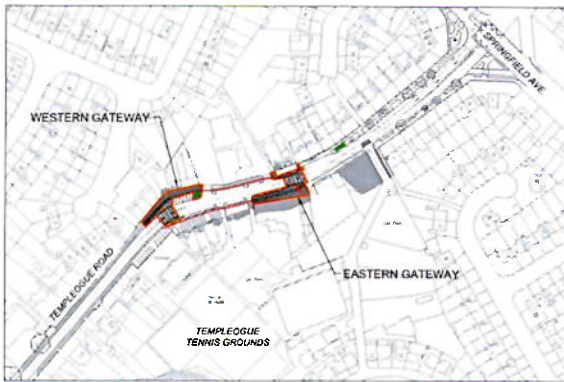
Annexes

Table of attachments

Annex A	
A-1	TVI Part 8 Drawing
A-2	TVI Part 8 Chief Executives Report
A-3	TVI Part 8 assessment against the NTA/SDCC Busconnects Layout

ANNEX A-1

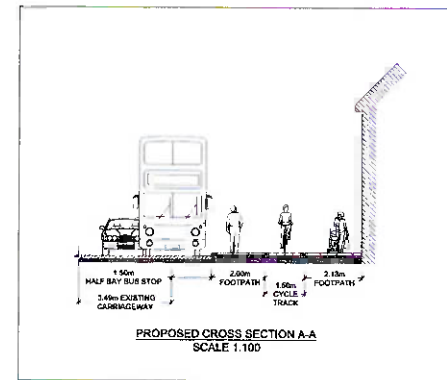
TVI Part 8 Drawing



SITE LOCATION MAP SCALE 1:2000



AERIAL VIEW OF TEMPLEOGUE VILLAGE FROM THE WEST



PROPOSED CROSS SECTION A-A
SCALE 1:100



TEMPLEOGUE VILLAGE INITIATIVE

SHEET 01
PART 8



NOTICE OF PROPOSED DEVELOPMENT BY A LOCAL AUTHORITY

Planning and Development Act, 2000 (as Amended)
Planning and Development Regulations 2001 (as Amended)

Templeogue Village Initiative

In accordance with Part 8 Article 81 of the Planning and Development Regulations, 2001 (as Amended), South Dublin County Council hereby gives notice of a proposal for the Templeogue Village Initiative.

Templeogue Village is included in the same traditional villages of South Dublin County Council identified for the Villages Initiative. The works which are the subject of this Part 8 are part of this programme of design and works intended to improve the villages in social, economic and environmental performance.

- The proposed Scheme includes the following improvements:
- Creation of two gateways, East and West, at each end of the village.
 - East Gateway is at The Morgue crossing over to the old AIB Bank.
 - West Gateway is at The Ferns Club crossing over to the restaurants and Atlas Car repairs.
 - New paving and planters to be installed at these locations.
 - The existing cycle tracks between the gateways will be retained and resurfaced.
 - The existing carriageway between the gateways will be resurfaced and retined.
 - The existing public lighting will be upgraded to LED and the columns will be repainted.
 - The signalled Pedestrian Crossing at East Gateway will be upgraded.
 - No change to existing parking arrangements between the gateways.

Inspection of Plans
Plans and particulars of the proposed scheme will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy, up to and including Monday 17th May 2018 at:

South Dublin County Council Offices, County Hall, Tallaght, Dublin 24.
Inspection only: From 9:00am - 5:00pm Monday to Thursday and 9:00am - 4:30pm on Friday
Inspection and purchase: From 9:00am - 4:00pm Monday to Thursday and 9:00am - 3:30pm on Friday (excluding bank and public holidays)

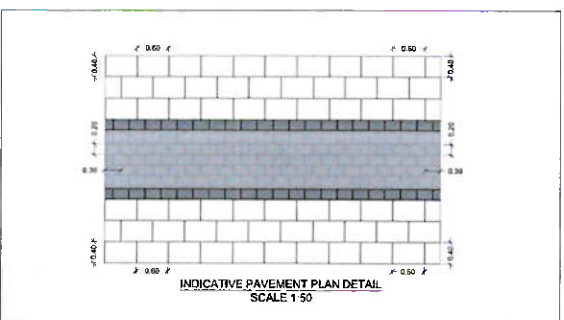
The documents are also available to view on South Dublin County Council's Public Consultation Portal website: <http://consult.southdublincoco.ie>

- Submissions**
Submissions and observations on the proposed development dealing with the proper planning and sustainable development of the area can be made as follows:
- On South Dublin County Council's Public Consultation Portal website <http://consult.southdublincoco.ie> up to midnight on 1st June 2018.
 - In writing to the Senior Executive Officer, Roads Department, Land Use, Planning and Transportation, County Hall, Tallaght, Dublin 24, to be received on or before 4:00pm on 1st June 2018. Submissions should be clearly marked "Templeogue Village Initiative".

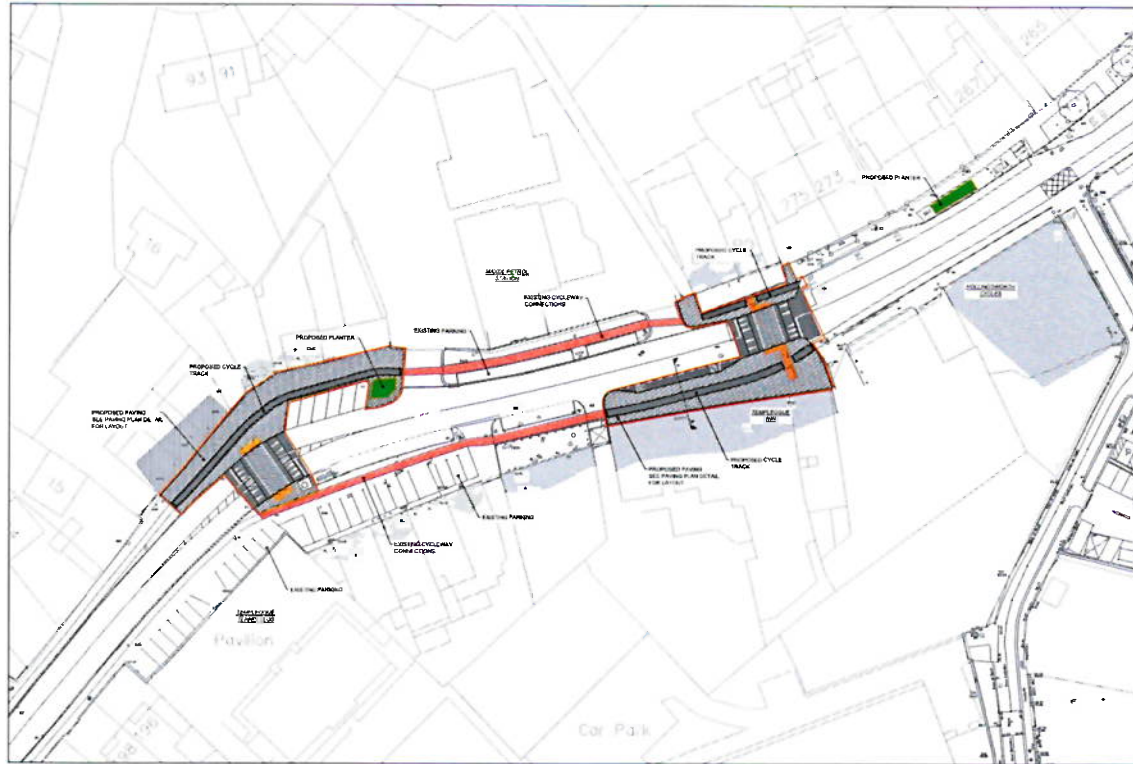
Only submissions received as set out above will be considered. Submissions cannot be accepted in any other format or to any other postal address. Submissions and observations should state the name, address and where relevant, the body represented. All comments submitted, including the names and addresses of those making the comments, will form a report to be presented to South Dublin County Council, and will form part of a public document.

Senior Executive Officer,
Roads Department,
Land Use, Planning & Transportation,
South Dublin County Council,
County Hall, Tallaght, Dublin 24. Dated: 29th March 2018

PUBLIC NOTICE



INDICATIVE PAVEMENT PLAN DETAIL
SCALE 1:50



SCALE 1:500 @ A1; 1:1000 @ A3

ORDNANCE SURVEY IRELAND LICENCE N.G. AR 0044218
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ANNEX A-2

TVI Part 8 Chief Executives Report

Land Use Planning and Transportation Directorate

	Part VIII Report – June 2018
Project Title:	Templeogue Village Initiative
Description of Project for Part 8 Consultation Notice and Site Notice:	<p style="text-align: center;"><u>Proposed New Works</u> Planning and Development Act, 2000 (as Amended) Planning and Development Regulations 2001 (as Amended)</p> <p>In accordance with Part 8, Article 81 of the Planning and Development Regulations, 2001 (as Amended), South Dublin County Council hereby gives notice of a proposal for the Templeogue Village Initiative.</p> <p>Templeogue Village is included in the nine traditional villages of South Dublin County Council identified for the Villages Initiative. The works which are the subject of this Part 8 are part of this programme of design and works intended to improve the villages in social, economic and environmental performance.</p> <p>The proposed Scheme includes the following improvements:</p> <ul style="list-style-type: none"> • Creation of two gateways, East and West, at each end of the village. • East Gateway is at The Morgue crossing over to the old AIB Bank • West Gateway is at The Tennis Club crossing over to the restaurants and Atlas Car repairs. • New paving and planters to be installed at these locations. • The existing cycle tracks between the gateways will be relined and resurfaced. • The existing carriageway between the gateways will be resurfaced and relined. • The existing public lighting will be upgraded to LED and the columns will be repainted. • The signalled Pedestrian Crossing at East Gateway will be upgraded. • No change to existing parking arrangements between the gateways. <p><u>Inspection of Plans</u> Plans and particulars of the proposed scheme will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy, up to and including Monday 17th May 2018 at:</p> <p>South Dublin County Council Offices, County Hall, Tallaght, Dublin 24.</p> <p>Inspection only: From 9:00am – 5.00pm Monday to Thursday and 9.00am - 4.30pm on Friday</p> <p>Inspection and purchase: From 9:00am – 4.00pm Monday to Thursday</p>

	<p>and 9.00am – 3.30pm on Friday (excluding bank and public holidays)</p> <p>The documents are also available to view on South Dublin County Council’s Public Consultation Portal website: http://consult.sdublincoco.ie</p> <p>Submissions</p> <p>Submissions and observations on the proposed development dealing with the proper planning and sustainable development of the area can made as follows;</p> <ul style="list-style-type: none"> • On South Dublin County Council’s Public Consultation Portal website http://consult.sdublincoco.ie up to midnight on 1st June 2018. • In writing to the Senior Executive Officer, Roads Department, Land Use, Planning and Transportation, County Hall, Tallaght, Dublin 24, to be received on or before 4.00pm on 1st June 2018. Submissions should be clearly marked “Templeogue Village Initiative” <p>Only submissions received as set out above will be considered. Submissions cannot be accepted in any other format or to any other postal address.</p> <p>Submissions and observations should state the name, address and where relevant, the body represented. All comments submitted, including the names and addresses of those making the comments, will form a report to be presented to South Dublin County Council, and will form part of a public document.</p> <p>Senior Executive Officer, Roads Department, Land Use, Planning & Transportation, South Dublin County Council, County Hall, Tallaght, Dublin 24. Dated: 29th March</p>
<p>Context:</p>	<p>Templeogue Village is included in the nine traditional villages of South Dublin County Council identified for the Villages Initiative. The works which are the subject of this Part VIII are part of this programme of design and works intended to improve the villages in social, economic and environmental performance.</p> <p>The Village Initiative intends to encourage and grow community involvement and partnership to complement and energise Council environmental and maintenance programmes and develop new projects. These new projects will help to develop the villages as the accessible focus of walking and amenity networks for their adjoining communities.</p> <p>The village and town centres can become more open and accessible, facilitating walking and cycling, increasing footfall and encouraging social and community encounters and interaction in festivals, performances and open-air markets.</p> <p>The promotion of quality, choice and diversity in goods, services and recreation in a lively, well-maintained setting, will attract more locals and visitors alike adding to the vibrancy and vitality of successful urban life.</p>

	<p>Village surveys and a SWOT analysis of the nine Villages have identified a number of key areas requiring attention in order to build on the villages existing strengths. These include the need for improved landscaping, prioritisation of open spaces, greater legibility and ease of access.</p> <p>Works contracts are being rolled out to address these short comings to aid in the revitalisation of the villages from the point of view of improving public realm and green infrastructure, removing clutter and improving accessibility and safety for pedestrians.</p> <p>The environmental activity of landscape, public realm and quality of buildings and shopfronts will be improved through design, capital projects and grant-aid. Support is available for Tidy Towns, community projects and festivals, to grow community support.</p>
<p>Project Description</p>	<p>The proposed works include two gateways at each end of the Village: one at the Western end at Templeogue Tennis Club and the other at the Eastern end at The Morgue Public House.</p> <p>It is proposed to enhance the public realm at these two locations to include good quality paving, stone kerbs, planters, bollards and upgraded public lighting. In addition, an upgraded signalled Pedestrian Crossing at the East Gateway will be provided.</p> <p>The upgrade to these areas will provide an improved experience for shoppers and visitors to the village.</p> <p>The existing cycle tracks between the gateways will be relined and resurfaced as will the existing carriageway.</p> <p>No changes will be made to the existing parking arrangements between the gateways. However, it should be noted that it is intended to include the creation of a new easily accessible car park into the scope of these works.</p> <p>This car park has already been the subject of a successful Part 8 application by South Dublin County Council to the elected members in December 2007. This new car park will be built on the lands formerly known as The Piggery situated on the laneway leading to Riverside Cottages and, by an agreement currently under discussion with the owners of The Morgue Public House, will be available for pedestrian access via The Morgue Car Park. Vehicular access will be via the laneway at Riverside Cottages.</p> <p>In addition, planters will be situated in order to discourage illegal parking currently taking place in the Village.</p> <p>The streetscape between the two Gateways will be surveyed in order to remove any items such as out of order phone boxes and other unnecessary street furniture.</p> <p>The overall estimated project budget for the village improvement works is €500,000.</p>

	Please refer to the attached Part 8 drawing for details.
Previous consultations	The scheme was presented as a proposal to the Rathfarnham/Tempoogue – Terenure Area Committee immediately prior to the Area Committee Meeting on 12 th December 2017. The proposal was approved in principle.
Project Partners	SDCC Architectural Services Directorate of Environment, Water and Climate Change Directorate of Economic, Enterprise and Tourism Development Tempoogue Village Tidy Towns Committee
Site / Services Constraints:	All major existing services runs have been identified for the design. Local alterations may be required when on site investigations establish the precise location of utilities.
Schedule of Part 8 Submissions Received	<p>Submissions were received during the specified period of the public consultation in respect of the proposed works from the following:</p> <ol style="list-style-type: none"> 1. SD-C56-1: Colm Garvey 2. SD-C56-2: Lillian Mac Gowan 3. SD-C56-3: Pamela Kearns 4. SD-C56-4: Paul Foley 5. SD-C56-5: Fiachra Maguire (on behalf of Dublin Cycling Campaign) 6. Shannon’s Pharmacy 7. Massey Bros. Funeral Home 8. Mark Brady (on behalf of Tempoogue Barbers) 9. Natasha Crudden (on behalf of Transport Infrastructure Ireland)
Recommendations Summary of Issues Raised, Responses and	<p>1. SD-C56-1: Colm Garvey Title: Re-locate cycle tracks before resurfacing</p> <ul style="list-style-type: none"> • The cycle track heading west (towards Tallaght) should stay on the road at the pedestrian crossing instead of veering left onto pavement at pedestrian crossing. Often, pedestrians and schoolkids are unaware that the cycle track has come in off the road and walk onto it blindly after crossing the street, there is no segregation or height adjustment between cycle path and pedestrian path and no signage when crossing the road to alert pedestrians of this. <p>Chief Executive’s Response: <i>The cycle track will be resurfaced and new road markings provided to improve its visibility. Improved signage will be provided. The paving area</i></p>

at this location will be increased as part of the scheme to provide more room for movement and delineation. In addition, the extension of the on-road cycle track system into the village from Templeogue Road will be considered as part of the detailed design.

- Keeping the track on the main road till after The Morgue would allow quicker access through the village for cyclists without weaving in and out of pedestrians coming in and out of the pub. Currently users of the bus stop outside the Morgue pub have to traverse the cycle track in order to step on or off the bus which is poor design and I have seen some accidents here. The cycle track could return to its current path outside O'Brien's off-licence.

Chief Executive's Response:

See response above. The existing layout at the Morgue pub and bus stop will be amended as part of the proposed scheme to provide increased width between pedestrians entering/exiting the pub (c. 2.1m) and the cycle track. There will also be increased width at the bus stop; a 2m area will be provided between the bus stop and the cycle track to allow passengers to board/alight the bus.

- The bike lane heading north should be extended into bus lane after it stops suddenly opposite Hollingsworth Cycles leaving cyclists stranded and forced to mount the pavement. Also, on this side, a string of neat evergreen trees could be planted outside the perimeter wall of the Petrol station.

Chief Executive's Response:

It is proposed to provide a cycle lane on the eastbound carriageway from the bus stop to the bus lane. Tree planting outside the petrol station will be considered if existing utilities under the pavement allow for it.

2. SD-C56-2: Lillian Mac Gowan

Title: Templeogue Village Parking

- Having read the plans for Templeogue Village I am very disappointed that the Parking problem has not been addressed. Parking is a major Safety issue in Templeogue Village. Vehicles drive across the footpath to nose park in front of the retail premises. They then reverse back across the footpath when leaving to access the road. I have witnessed vehicles, both cars & large delivery vans driving the length of the Village footpath to access parking. It is a miracle that a pedestrian hasn't been seriously injured. The footpath should be reduced & nose in parking introduced from the road to the footpath. Bollards could be erected to stop the vehicles mounting the footpath.

Chief Executive's Response:

The lands between the façade of shops and the existing footpath/cycleway from (and including) the driveway at O'Briens off licence to Templeogue Barbers are currently not in the possession of South Dublin County

Council. As such, it is not possible to reconfigure the existing parking arrangement as suggested. In addition, as outlined in the Project Description above, the inclusion of a new easily accessible car park will provide a user friendly alternative for the local community.

- This is a very serious safety issue & I don't understand why a ban on vehicles driving on the footpath is not enforced.

Chief Executive's Response:

As stated above, the issue regarding land ownership at this location precludes us from reconfiguring the parking/footpath arrangement here.

- My home is next door to the Tennis Club. When we purchased our home 33 years ago there was a Compulsory Purchase Order on the front garden wall to allow road works to improve traffic & parking in the interest of safety in Templeogue Village. How long does it take to get Safety issues enforced? Yes, planters & lighting is a nice addition to the Village but the major priority is SAFETY & this has not been addressed. I am pleading with SDCC to have serious consideration for this major SAFETY issue.

Chief Executive's Response:

Noted.

3. SD-C56-3: Pamela Kearns

Title: Templeogue Village Initiative

Based on our observations and a number of proposals put forward by local residents and some traders, on behalf of the Templeogue Tidy Towns/Village Initiative group I would like to make the following submission in relation to the proposed part 8 for Templeogue Village. We believe that these changes if implemented will greatly enhance the plans that are currently on display and will be of a greater benefit to the wider community.

1. The suggested enhanced paving to be extended throughout the village (excluding the areas in private ownership) these areas are outlined in green on the accompanying map.

Chief Executive's Response:

The paving will be extended throughout the village along the areas between the Gateways as indicated on the attached submitted map referred to above.

2. More planters with seating as shown in the photographs attached. We feel this would encourage local residents and visitors to linger and thus help create a better sense of community in the area. Also, that provision is made for a permanent Christmas tree close to an electrical source (possibly in one of the planters)

Chief Executive's Response:

It is intended to position planters in the positions indicated in the attached

Part 8 drawing. If it is feasible to include more planter locations, then we will try to do so in agreement with local representatives. There are limited locations available for seating but we will endeavour to locate some seating if at all possible. Our street furniture for the Village Initiatives is all procured from an existing single supplier framework agreement. A suitable location for a 'live' Christmas Tree will be assessed in consultation with the Directorate of Environment, Water and Climate Change.

3. The existing public lighting to be removed and replaced with new LED lighting in keeping with the village façade and history.

Chief Executive's Response:

This item is already noted in the Part 8 application. The existing public lighting will be replaced with LED fittings and modified/repainted in consultation with local representatives.

4. The bollards that are currently in place are removed and replaced with a more uniform design in keeping with the façade/history of the village and mindful of the colour/shape of the new public lighting lamp standards.

Chief Executive's Response:

As stated above, there is a single supplier framework in place for the Village Initiative Schemes. Street furniture styles will be chosen from the supplier brochure in consultation with local representatives.

5. The existing litter bins are removed and replaced with a design consistent with the proposed lamps/bollards as mentioned above. And placed in locations to maximise their use.

Chief Executive's Response:

See item 4 above. Locations will also be chosen in consultation.

6. Drainage has been a serious problem in the village for a number of years. We ask that the drainage situation is addressed so that there will be no more pooling of water during rainfall events. A problem which in the past rendered a number of parking spaces redundant.

Chief Executive's Response:

The drainage design will be addressed in conjunction with the Directorate of Environment, Water and Climate Change and will be included in the works contract for the Village Initiative.

7. We request that two Welcome to Templeogue Village signs are placed at both ends of the village in a design consistent with the proposed hardware in the village centre.

Chief Executive's Response:

There is a separate Village Signage Initiative currently in progress for the county as a whole. The Welcome signs for Templeogue Village will be addressed as part of that.

8. The footpath outside Templeogue Tennis Club is in a serious state of disrepair. We ask that this too be replaced with an appropriate surface.

Chief Executive's Response:

This item will be included in the scope of works for the Village Initiative.

9. All redundant street clutter to be removed including the two phone

boxes.

Chief Executive's Response:

This item will be included in the scope of works for the Village Initiative

10. A new electric car charging point be installed in the public car park opposite the piggery site to the rear of the Templeogue Inn.

Chief Executive's Response:

This item will be included in the scope of works for the Village Initiative. The charging point will be sited in the new car park referred to in the Project Description above. This new car park will be located to the immediate rear of The Morgue (Templeogue Inn) on the site of the former Piggery

11. A secure storage space of approx. 2.5mx4m be made available for use by the Tidy towns group for storage of equipment and supplies.

Chief Executive's Response:

This item will be discussed with The Directorate of Environment, Water and Climate Change.

12. A number of traders have made complaints in relation to the "Love All" sculpture in the village citing it as a health and safety issue. With this in mind we ask that you explore the possibility of moving the sculpture from its current position to an area across the road outside the Maxol garage (as shown on the accompanying map)

Chief Executive's Response:

The current location of the 'Love All' sculpture is outside the Tennis Club and the sculpture was commissioned and designed to be placed in that location. For that reason, it is our preference to maintain that location if at all possible. We intend to commission a Road Safety Audit to investigate any Traffic/Pedestrian Safety issues associated with the current location of the sculpture.

Templeogue Village is a busy hub of shops, restaurants, medical facilities, the tennis club and small local businesses. It is very important that the infrastructure is put in place to maintain and enhance the experience of residents and visitors to the village while also preserving the integrity of what is an area of historical interest. We, the Tidy town committee support the objectives of the council in relation to making the county and in this case the village the best place to live, work and do business. We believe that this part eight with our suggested amendments included is an opportunity to achieve this objective and trust that you will look upon this submission in that light.

Yours sincerely,

Pamela Kearns

4. SD-C56-4: Paul Foley

Title: Submission to Templeogue Village Improvements Part 8

I am disappointed by the approach SDCC have taken to this Part 8. I would have several more suggestions regarding improvements to the village and surrounding areas if the uncertainty around the public car park in the village could be clarified. It is my opinion that proposed changes to the public car parking in Templeogue village – which are likely to take place within one year of this Part 8 – should be included to get the best plan for Templeogue village.

I understand the complexities involved in including the public car park in this plan but, in the interest of transparency, the residents and traders of Templeogue should have all the facts at their disposal when making a decision of this magnitude. With the amount of money being spent it is important that we get the best plan possible for Templeogue village.

While including the public car park at this time may constitute a material change to this Part 8 and may result in a delay to the works programme for Templeogue village, I have been consistent in asking that the piggery site be included in the Part 8 for Templeogue village improvements.

Chief Executive's Response:

No changes will be made to the existing parking arrangements between the gateways. However, it should be noted that it is intended to include the creation of a new easily accessible car park into the scope of these works, as stated above in the Project Description and previous responses. This new car park will be built on the lands formerly known as The Piggery. An agreement is currently under discussion with the owners of the Morgue Public House and will provide for pedestrian access from the Village via The Morgue Car Park. Vehicular access will be via the laneway at Riverside Cottages.

The car park in question has already been the subject of a successful Part 8 application by South Dublin County Council to the elected members in December 2007 and, as such, is not required to be included in this Part 8. A material change to this Part 8 is therefore not necessary.

I would like to acknowledge and lend my support to the great work and the submission (draft) of the Templeogue Village Tidy Towns/Village Initiative group which I attach.

In addition to the excellent suggestions made by the Templeogue Tidy Towns/Village Initiative group I would like to suggest the following:

- Mature trees planted through the village would enhance the overall look of the village

Chief Executive's Response:

The planting of trees in urban villages such as Templeogue is severely hampered by the density of services located beneath the existing paving. This is why the current preferred approach by the Villages Initiative is to locate planters at suitable locations if no suitable planting opportunity is available. Site investigations prior to commencement of works will give an indication of any possible tree planting options.

- I would like to reiterate the point made by the Village Initiative group about the safety aspects of the "Love All" sculpture which severely restricts

sight lines for young children, cyclists and, in particular, wheelchair users. I do feel that the sculpture adds to the village and, if possible, would like to see it accommodated elsewhere.

Chief Executive's Response:

As stated above in the previous Submission No. 3, the current location of the 'Love All' sculpture is outside the Tennis Club and the sculpture was commissioned and designed to be placed in that location. For that reason, it is our preference to maintain that location if at all possible. We intend to commission a Road Safety Audit to investigate any Traffic/Pedestrian Safety issues associated with the current location of the sculpture.

- One other item of concern would be the often-reported issue of the lack of space for people getting on and off the bus at the Morgue stop in Templeogue village. There is currently insufficient space between the stop and the cycle lane and there are often incidents. The final design will have to account for this. If there is insufficient space, then perhaps a bus shelter or a barrier system could be considered to keep one away from the other.

Chief Executive's Response:

As stated above in Submission No 1, the existing layout at the Morgue pub and bus stop will be amended as part of the proposed scheme to provide increased width between pedestrians entering/exiting the pub (c. 2.1m) and the cycle track. There will also be increased width at the bus stop; a 2m area will be provided between the bus stop and the cycle track to allow passengers to board/alight the bus.

5. SD-C56-5: Fiachra Maguire (on behalf of Dublin Cycling Campaign)

Title: Redesign of Existing track

Summary

The current plans rely heavily on existing cycle facilities through the village and are not fit for purpose.

Most cyclists do not use the cycle tracks preferring to stay on the main thoroughfare because of the poor design of the cycle tracks.

South Dublin County Council should consider redesigning the cycle paths before they reline and resurface them.

- In general, pedestrians are unaware of the cycle tracks and walk on them. This is exacerbated at the outbound bus stop outside the Morgue pub at the Eastern end of the Village where conflict arises between cyclists and bus passengers.

Chief Executive's Response:

The proposed layout at the bus stop at The Morgue pub includes increased footpath width on the pub side of the cycle track and a larger area for bus passengers to board/alight the bus. The increased area around the bus stop will reduce potential pedestrian/cyclist conflicts. The cycle tracks will be resurfaced and relined to improve the segregation.

- The exit from the car park at the rear of the Morgue pub has poor sight lines and exiting motor vehicles present a risk to both cyclists and pedestrians.

Chief Executive's Response:

The proposed cycle track will be resurfaced and relined to improve legibility for drivers exiting The Morgue and increase awareness that cyclists may be approaching.

- In the section outside O'Brien's off licence and the Post Office there is poorly positioned street furniture. For example, the postbox is in close proximity to the cycle track with pedestrians forced to stand in the cycle track to access it.

Chief Executive's Response:

It is proposed to engage with An Post regarding the positioning of existing post boxes.

- Cars parking outside the shops (as maintained in the proposed designs) cross the cycle track with no awareness of its existence and with poor appreciation of their proximity to cyclists. Cars regularly park on the cycle track (illegally) and results in cyclists being forced either onto the road off of the footpath or into pedestrian area.

Chief Executive's Response:

The lands between the façade of shops and the existing footpath/cycleway from (and including) the driveway at O'Briens off licence to Templeogue Barbers are currently not in the possession of South Dublin County Council. As such, it is not possible to reconfigure the existing parking/footpath/cycleway arrangement as suggested.

The proposed cycle track will be resurfaced and relined to improve legibility for drivers entering and exiting these parking spaces.

- Entering the village from the West, the cycle track commences abruptly without indication. Furthermore, the cycle track comes to a sudden end outside the barber's without indication that cyclists should rejoin the carriageway.

Chief Executive's Response:

A transition from the off-road track to the on-road lane on the westbound side of the carriageway will be provided as part of the scheme. Similarly, a transition from cycle lane to cycle track will be provided on the eastbound approach.

- The West Gateway courtesy crossing at Templeogue Tennis Club should be converted to a zebra or toucan crossing. The current layout gives pedestrians the impression that they have the right of way to cross the road but motorists do not generally stop.

Chief Executive's Response:

It is proposed to retain a courtesy crossing arrangement on the raised crossing at the Tennis Club.

- In the past year a number of deaths have occurred in the Templeogue area. These occurred at areas where there was poor consideration given to the cyclists in the road design. It is regrettable that these deaths may have been prevented with greater separation between cyclists and motor vehicles. Greater protection for cyclists and pedestrians should therefore be a priority in the design of any improvement scheme for Templeogue Village.

Chief Executive's Response:

The proposed scheme retains the segregation between vehicles and cyclists. The cycle tracks will be resurfaced and relined to improve legibility for all users to reduce instances of pedestrian-cyclist and driver-cyclist conflicts.

- Key issues which should be addressed in revisions of this scheme for the benefit of all village users include:
 - Positioning of the cycle track closer to the road.

SDCC Response:

It is proposed to retain the existing segregated route through the village with parking-protected cycle tracks.

- Bollards should be erected to reinforce the cycle track and address many of the difficulties highlighted above (e.g. prevent illegal parking).

Chief Executive's Response:

The use of bollards and their potential locations will be examined at detailed design stage and in consultation with local businesses.

- Signposting should be used liberally to indicate the cycle track.

Chief Executive's Response:

The installation of appropriate signs will be considered during the detailed design process.

- Introduction of a 30 km/h speed limit between the two gateways in order to provide necessary traffic calming.

Chief Executive's Response:

The current speed limit is 50 km/h which is the standard speed limit requirement on entering village/urban areas. A reduction to 30 km/h will be considered as part of the detailed design in consultation with the Traffic Section. .

- Provision of cycle parking facilities outside the shops and the restaurants.

Chief Executive's Response:

Increased cycle parking will be provided as part of the scheme. Exact locations will be determined at detailed design stage in consultation with local representatives.

6. Shannon's Pharmacy

7. Massey Bros. Funeral Home

8. Mark Brady (on behalf of Templeogue Barbers)

These submissions are all worded identically and read as follows:

Title: Templeogue Village Initiative

I wish to make a submission in relation to the recent Part 8 proposal for Templeogue Village.

In my opinion, the 'Love All' sculpture that is currently in situ on the

	<p>pavement outside the Barber's shop constitutes a serious health and safety risk to pedestrians crossing at the gateway. It is particularly dangerous for young children and people in wheelchairs, because, by virtue of their height, they cannot be seen by traffic approaching from the city side of the roadway. With this in mind, I request that the sculpture be removed and reinstated on the opposite side of the road in the parking bay outside the Maxol Garage as shown on the map submitted by the Tidy Towns group. I attach some photographs to support this submission.</p> <p>Chief Executive's Response: <i>As stated above in the previous Submission No. 3, the current location of the 'Love All' sculpture is outside the Tennis Club and the sculpture was commissioned and designed to be placed in that location. For that reason, it is our preference to maintain that location if at all possible. We intend to commission a Road Safety Audit to investigate any Traffic/Pedestrian Safety issues associated with the current location of the sculpture.</i></p> <p>9. Natasha Crudden (on behalf of Transport Infrastructure Ireland)</p> <p>Title: Templeogue Village Initiative</p> <p>A chara,</p> <p>I wish to acknowledge receipt of the Part VIII referral of 29 March 2018 regarding the above and advise that TII has no specific observation to make in this regard.</p> <p>Chief Executive's Response: <i>Noted.</i></p>
<p>Chief Executive's Recommendation</p>	<p>Following consideration of the above submissions, I recommend that the proposal be approved in line with the recommendations set out in this Report.</p>

ANNEX A-3

TVI Part 8 assessment against the NTA/SDCC Busconnects Layout

TVI PART 8 ASSESSMENT AGAINST THE NTA/SDCC BUSCONNECTS LAYOUT

1. Background Information

Templeogue Village Initiative (TVI) is a public realm improvement project. As the TVI is a prescribed development under the Planning and Development Act, SDCC completed a [Part 8](#) in 2018. The drawing and statutory notice issued are included at the link above. The TVI Part 8 public consultation was conducted March-May 2018.

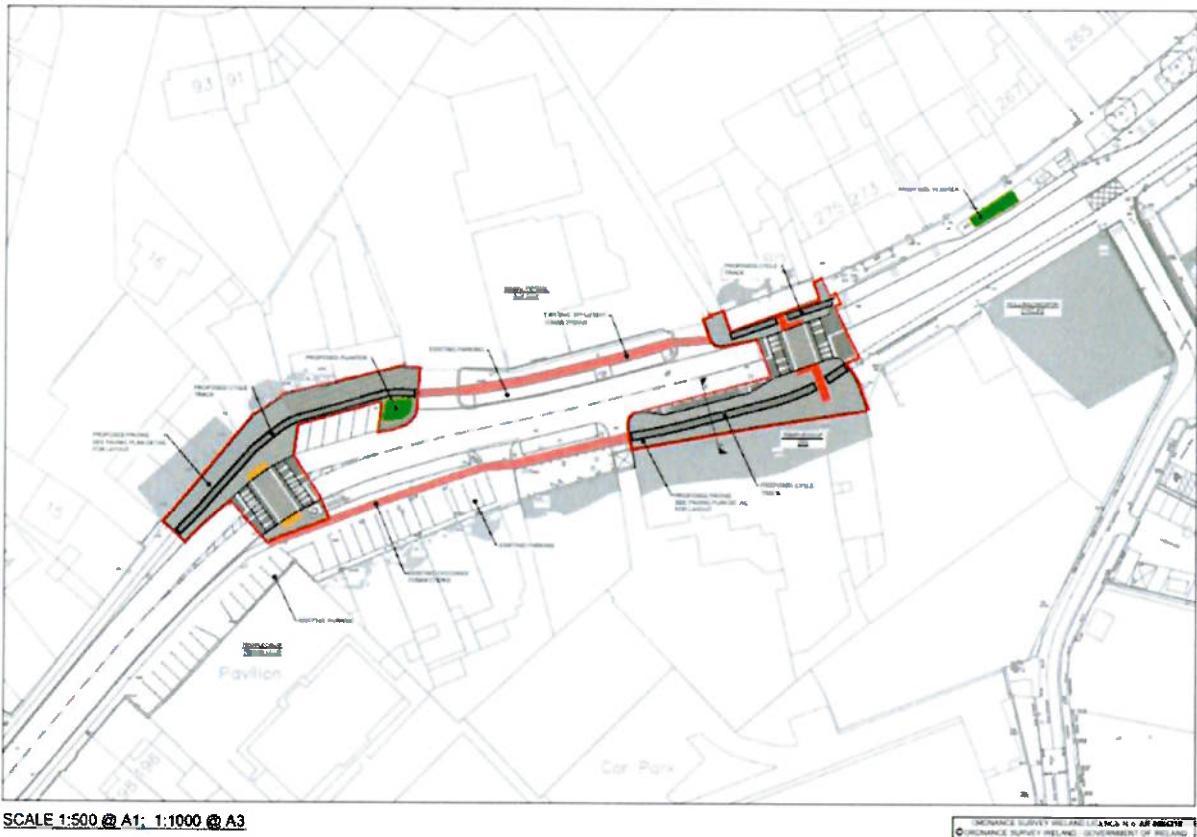


Figure 13 SDCC TVI Part 8 Plan 2018

The Chief Executive's Report recommendation was that the "proposal be approved in line with the recommendations set out in this Report". On 9th July 2018 Councillors voted to approve the Chief Executive's Report ([minutes 9th July 2018](#)). This record shows that no resolutions were proposed or passed to alter the scheme as recommended. A copy of the Report is available at a link within the minutes.

Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

Templeogue Village also forms parts of the NTA's Busconnects CBC 10 Tallaght-Terenure route, and the NTA conducted their first public consultation between January to April 2019.

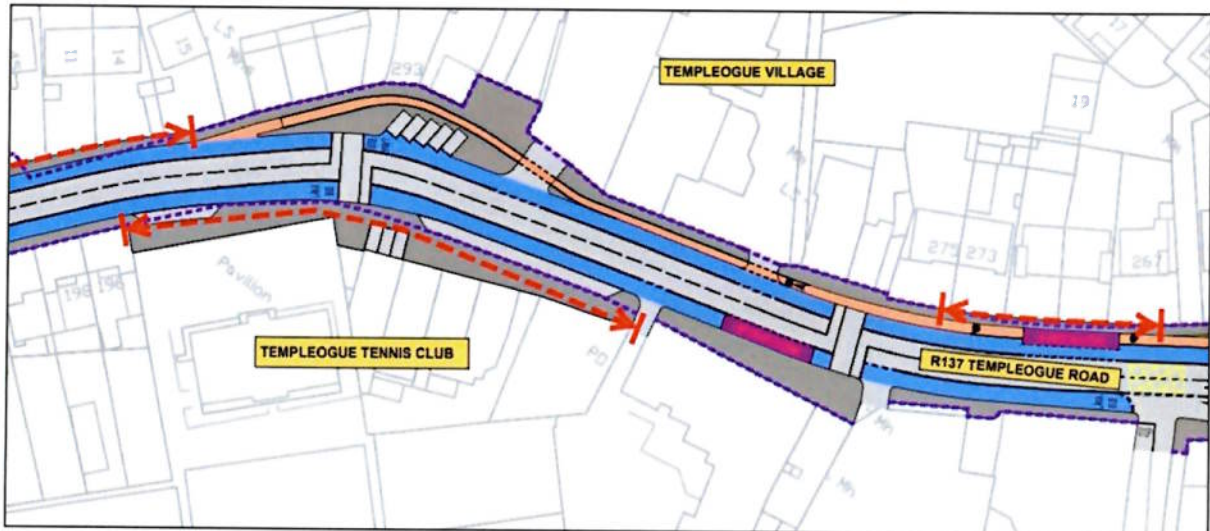


Figure 14 NTA Busconnects CBC10 Public Consultation 1

After the consultation, the above plan was significantly amended and the NTA presented a new design (below) at a Community Forum meeting in September 2019.

(<https://busconnects.ie/initiatives/community-forum>)

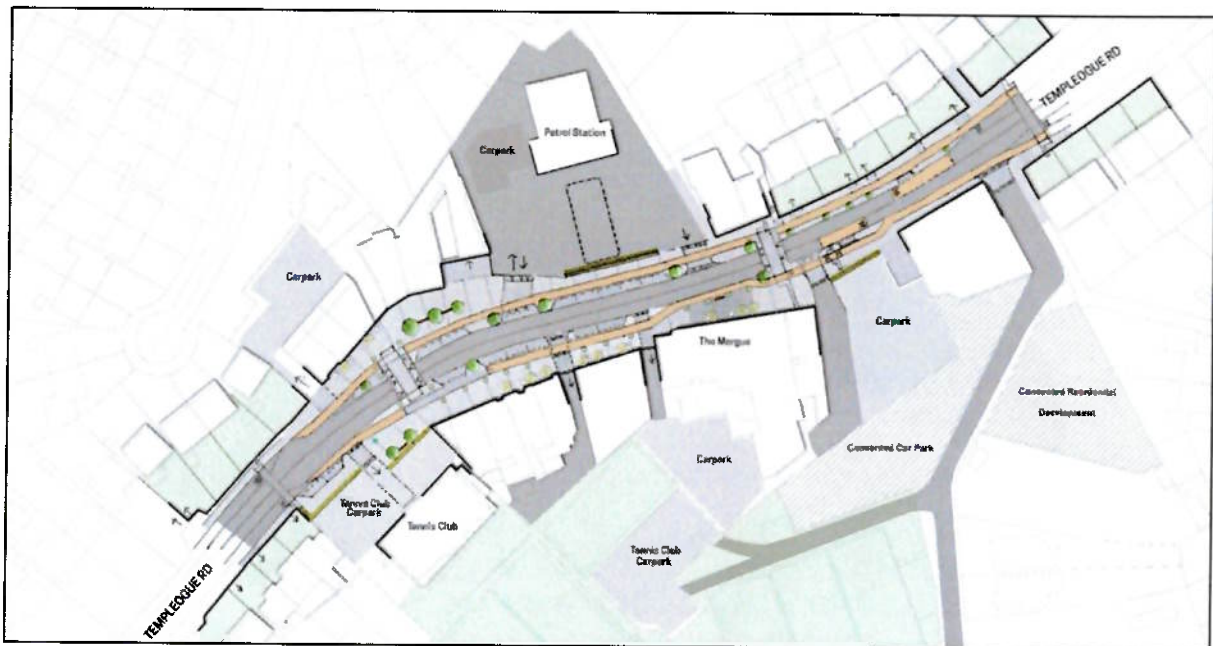


Figure 15 Busconnects CBC10 Revised Plan presented at a Community Forum in September 2019

In January 2020 the NTA publicly announced that Templeogue Village would be removed from their plans to enable SDCC to progress the TVI Part 8 plans. This removed the Village from the second Busconnects public consultation conducted April 2020, as evidenced by the drawing below.

As Busconnects CBC10 is a continuous route, the SDCC TVI will ultimately form part of the Busconnects design which has been submitted to An Bord Pleanala.

Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

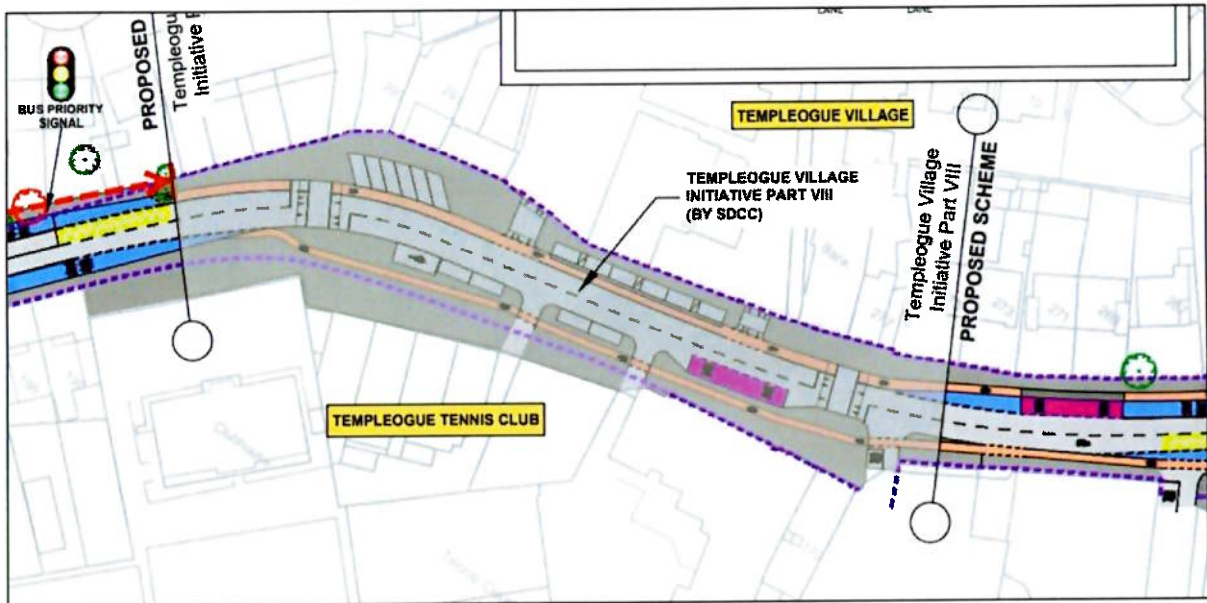


Figure 16 Busconnects CBC10 Public Consultation 2 with the Village removed, note reference to TVI Part 8

In July 2020 SDCC issued a set of plans to tender which appear to be materially different to the Part 8 design approved by councillors in 2018.



Figure 17 SDCC July 2020 Tender Drawings (note existing kerb lines in red)

Note the tender documents also include a car park, which was subject to a Part 8 in 2007 (County Development Plan 2004-2010).

2. Nature and Extent of the Proposed Development

Articles 81 and 83 of the Planning and Development Regulations require the local authority to provide a notice and documentation that indicate and describe "the nature and extent of the proposed development".

- The proposed Scheme includes the following improvements:**
- Creation of two gateways, East and West, at each end of the village.
 - East Gateway is at The Morgue crossing over to the old AIB Bank.
 - West Gateway is at The Tennis Club crossing over to the restaurants and Atlas Car repairs.
 - New paving and planters to be installed at these locations.
 - The existing cycle tracks between the gateways will be relined and resurfaced.
 - The existing carriageway between the gateways will be resurfaced and relined.
 - The existing public lighting will be upgraded to LED and the columns will be repainted.
 - The signalled Pedestrian Crossing at East Gateway will be upgraded.
 - No change to existing parking arrangements between the gateways.

Figure 18 Extract from the statutory notice, TVI Part 8 2018 (<http://www.sdublincoco.ie/Media/Item/38814>)

What appear to be material deviations from the nature and extent of works described in the notice and documentation include, but are not limited to:

- The existing northern cycle track is realigned completely, moved outside the parking protection, and desegregated.

The notice and documentation indicated existing cycle tracks will be relined and resurfaced.

- The existing kerb lines are extensively realigned on both sides of the street. Overall kerb to kerb widths are widened over most of the scheme.

The notice and documentation indicated existing carriageway will be relined and resurfaced.

- Roadway widened beyond the eastern gateway to lengthen the bus lane.

No works are indicated or described in the notice or documentation.

- Extensive alterations to existing parking arrangements are proposed, including materially changing:
 - the disabled parking provisions
 - the location, orientation, and operation arrangement of the 6-bay echelon parking on the north side of the Village
 - the location of and access/egress arrangement to the parallel bays in front of the service station (i.e., a driver must now drive and/or reverse along a cycle lane to use the parking)

The notice stated there would be no change to existing parking arrangements.

Refer to the drawings appended.

3. Lands Identified & Drawings

Article 83 of the Planning and Development Regulations requires a local authority to make available for inspection a location map marked or coloured to clearly identify the land on which it is proposed to carry out the proposed development.

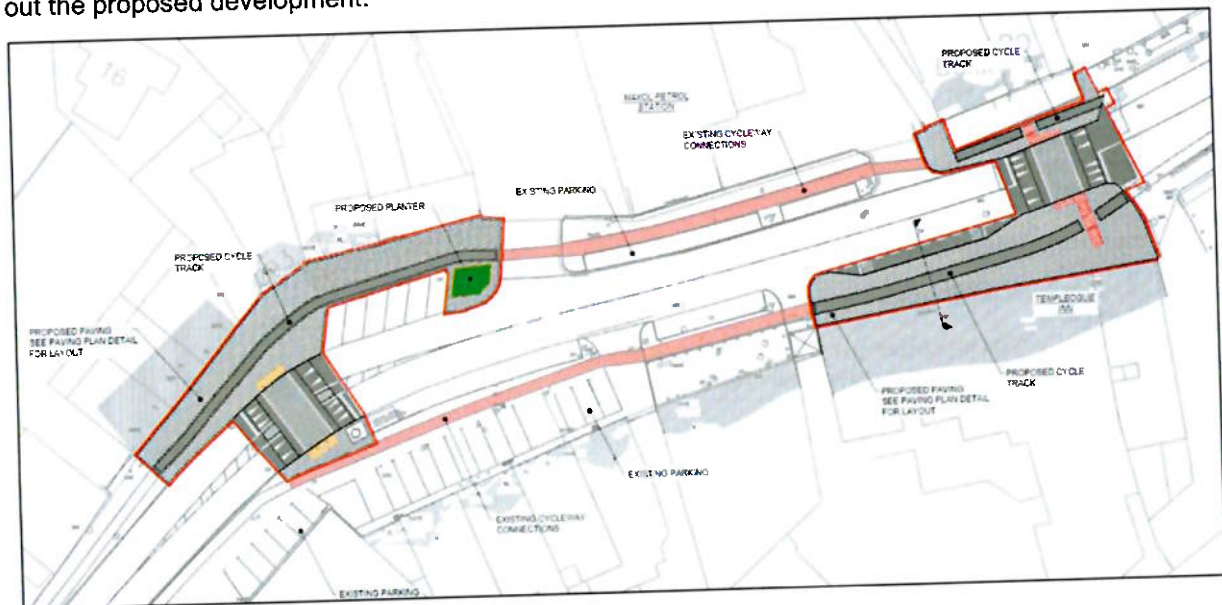


Figure 19 SDCC TVI Part 8 Plan 2018 indicating deliberately restricted red line boundaries.

The 2018 Part 8 planning drawing included red line boundaries which appear quite deliberately drawn to limit their extent and not include on-street parking. The proposed design includes extensive material differences that result in works well beyond the areas coloured to identify the works. Refer to the drawings appended.

The works which appear to breach the planning boundaries include but are not limited to:

- The existing northern cycle track is realigned completely, moved outside the parking protection, and desegregated.
The drawing shows the alignment of the existing tracks unaltered.
- The existing roadway kerb lines are extensively realigned on both sides of the street.
The drawing shows the existing roadway unaltered.
- Roadway widened beyond the eastern gateway to lengthen the bus lane.
The drawing shows no works in this area.
- Extensive alterations to existing parking arrangements are proposed, including materially changing:
 - the disabled parking provisions
 - the location, orientation, and operation arrangement of the 6-bay echelon parking on the north side of the Village
 - the location of and access/egress arrangement to the parallel bays in front of the service station (i.e. a driver must now drive and/or reverse along a cycle lane to use the parking)

The drawing shows no change to existing parking arrangements.

4. Plans made available for inspection and consultation

The Act and Regulations require the local authority to make available for inspection, by members of the public, any specified documents, particulars, plans or other information with respect to the proposed development.

Changes that materially altered the original Part 8 scheme were made in the later part of 2019 after the first Busconnects CBC10 public consultation and Community Forum in September 2019. The original Part 8 process had been concluded over a year earlier in summer 2018. The changes occurred after the NTA withdrew their plans for Busconnects.

It appears that a public consultation on the current plans (what appears to be a hybrid of the original Part 8 TVI and Busconnects) has not taken place.

5. Chief Executive's Report

Section 179 of the Act requires the Chief Executive's Report to "describe the nature and extent of the proposed development and the principal features thereof and shall include an appropriate plan of the development and appropriate map of the relevant area".

The extent and nature of the proposed works described in the Report are similar to the original Part 8 drawing and notice. The proposed works therefore appear to be materially different to the nature and extent of the proposed development described in the Chief Executive's Report.

In relation to the items raised previously, the following commitments are made in the Chief Executive's Report and appear to be disregarded in the proposed plans:

- The existing northern cycle track is realigned completely, moved outside the parking protection, and desegregated.

The Report commits:

- Pg. 10 *"The cycle tracks will be resurfaced and relined to improve the segregation."*
- Pg. 12 *"The proposed scheme retains the segregation between vehicles and cyclists. The cycle tracks will be resurfaced and relined to improve legibility for all users to reduce instances of pedestrian-cyclist and driver-cyclist conflicts."*
- Pg. 12 *"It is proposed to retain the existing segregated route through the village with parking-protected cycle tracks."*

The proposed works appear to be materially different and contradictory to the commitments made in the Report. The existing northern cycle track is realigned completely, moved outside the parking protection, and desegregated. It is not a parking protected track and does not a segregated cycle track in accordance with DMURS or the NCM. SDCC appear to have downgraded the existing segregation and removed parking protection. This would introduce several dangerous new driver-cyclist conflicts, not reduce them.

- The existing carriageway kerb lines are extensively realigned on both sides of the roadway.

The Report commits:

- Pgs. 8,10, & 13 *"We intend to commission a Road Safety Audit to investigate any Traffic/Pedestrian Safety issues associated with the current location of the sculpture."*

The Act or Regulations do not include a mechanism whereby a report from a 3rd party can alter the nature and extent of the proposed works as committed to in the Chief Executive's Report, or alter the lands identified with the planning boundary.

Furthermore, most road realignment works appear unrelated to the sculpture, rather they relate to changes to the parking arrangements and northern cycle track realignment.

- Roadway widened beyond the eastern gateway to lengthen the bus lane.

The Report does not include a description of this work, nor does it commit to doing it.

Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

- Extensive alterations to existing parking arrangements are proposed, including changing:
 - the disabled parking provisions
 - the location, orientation, and operation arrangement of the 6-bay echelon parking on the north side of the Village
 - the location of and access/egress arrangement to the parallel bays in front of the service station (i.e. a driver must now drive and/or reverse along a cycle lane to use the parking)

The Report commits:

- Pg. 3 & 9 "No changes will be made to the existing parking arrangements between the gateways."

In addition, pg. 12 commits that "Increased cycle parking will be provided as part of the scheme". The plans tendered did not include any additional cycle parking, but some was installed in spare spaces.

The Act requires the Chief Executive's Report to "recommend whether or not the proposed development should be proceeded with as proposed, or as varied or modified as recommended in the report, or should not be proceeded with, as the case may be."

The Chief Executive's Report recommendation was:

"Following consideration of the above submissions, I recommend that the proposal be approved in line with the recommendations set out in this Report."

On 9th July 2018 Councillors voted to approve the Chief Executive's Report ([minutes 9th July 2018](#)).

6. Summary County Development Plan & Safety

It is my opinion that the proposals result in an unsafe environment for people cycling on both sides of the street and for pedestrians on the south side of the street. The plan does not appear to address existing conflicts, but rather introduces new ones.

The plan for the north side of the street is a clear downgrade in terms of type of cycle facility and safety for people cycling within the Village. The plan appears to downgrade the existing segregation and protection afforded to people cycling by moving the northern cycle track onto the roadway and outside the on-street parking with no segregation between the gateways.

The proposed changes also appear to introduce several new hazards and increase the risk for people cycling, including

- increased conflict with drivers accessing parking on street cycle lane on the north side of the street,
- drastic reduction in sightlines to the cycle lane at exits and parking on the north side of the street,
- positioning bike lane users in a sub-standard width bike lane in the door zone between parking and a busy traffic lane, and
- putting people cycling into dangerous conflict with drivers accessing or egressing the parking spaces on the north side of the street.

The revised proposals are inconsistent with the County Development Plan, DMURS and the NCM, as well as other regional and national policy.