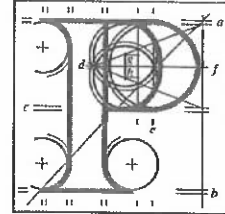


Our Case Number: ABP-316272-23



An
Bord
Pleanála

Lorna Callanan
55 Rathfarnham Road
Terenure
D6W X314

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 be advised that landowners listed on the Compulsory Purchase Order schedule associated with this application are not required to pay the €50 fee associated with this case. As you are listed as a landowner, a refund of €50 will be issued under separate cover.

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

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Lorna Callanan
55 Rathfarnham Road,
Terenure
D6W X314

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

AN BORD PLEANÁLA	
8 th August 2023	
LDG- <u>065671-23</u>	
ABP- _____	
14 AUG 2023	
Fee: € <u>50.00</u>	Type: <u>CAIC</u>
Time: <u>12.04</u>	By: <u>hand</u>

Re: Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme (ABP- 316272-23)

Dear Sir/Madam,

General comments

I wish to object to the Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme. Whilst the objective to improve mass public transport and cycling infrastructure and reduce congestion is commendable and necessary, the minimal, short-term benefits of the proposed scheme are not proportionate to the scale of permanent destruction, environmental impacts, land acquisition and financial costs involved.

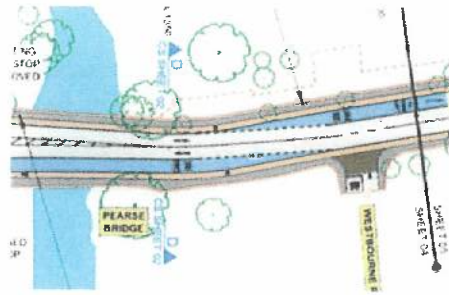
Additionally, due to acknowledged limited capacity the scheme will create, this project will do little to address the use of the private car within the catchment as this is fully conceded in the current Greater Dublin Area Transport Strategy 2022-2042 (GDATS).

Request for Oral Hearing

Due to the extensive and complex impacts of the proposed scheme, I request an Oral Hearing be held. Additionally, due to the piecemeal application of each of the core bus corridor schemes separately, it is important the combined impacts of the individual schemes are assessed in full.

Breach of Building Regulations, Part M- Rathfarnham Road, Rathdown Park Junction to Pearse Bridge.

CPOs affecting Nos 51,53,55,57,59,61,63,65,67,69,71 Rathfarnham Road are likely to cause a material breach of Department of Housing, Local Government and Heritage, Building Regulations Part M which relates specifically to gradient and accessibility. Part M states that development may not result in a further worsening of conditions even where the original property is already in breach of regulations. The houses along this stretch are positioned so that the gradient of their driveways increases as you progress towards the river Dodder. Basic 2-dimensional maps of proposed CPOs provided by the NTA give no information beyond a single red line. No 3-D/section drawings were provided despite requests and despite the complex terrain. This lack of information frustrated efforts to engage with the statutory process fairly. To attempt to assess the consequences of the proposed land take, NRB Consulting Engineers were engaged and their expert opinion report is included at the



Terenure Road East- Alternatives

Bus Priority Signalling is currently in situ at 55 Terenure Road East for outbound traffic but it is not fully operational and therefore its effect has not been analysed. The current proposals suggest moving this signal 150 metres westwards to St Joseph’s Church, with extensive CPO of historical boundaries (many listed) for road widening. This yields no material advantage, particularly as outbound traffic will already be significantly reduced. This proposal will create significant destruction to amenity, heritage, listed properties, trees/environment, etc., destroying one of Dublin’s nicest historical streetscapes without creating any appreciable gain. Operationalising the current bus priority signalling is the most cost effective, least destructive option.

Proportionality

The proposals, with resultant impacts (environmental/destruction/ disruption/cost), are not proportionate to the small levels of improvement in transit times, nor are they proportional to the expected short lifespan of benefits of the scheme.

According to the EIARs provided, from commencement of operation (2028), transit time improvements are likely to be

- Templeogue to Terenure peak time bus transit times will only improve by 1 minute
- Rathfarnham to City centre peak time transit will only improve by 5-6 minutes.
- Off peak transit times will remain much the same as current.

However, bus transit times improvements will be **generally eroded by 2040/3** – giving approximately 12-15 years of small, peak -time-only, limited benefit despite all the investment, destruction and upheaval.

Consideration of Alternatives to Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme.

The GDATS identified that Luas lines will be required by the early 2040s to upgrade the proposed Templeogue/Rathfarnham scheme. Additionally, the GDATS concedes that both private and commercial transport will increase significantly along this corridor and acknowledges the limited capacity of Bus Connects. From the EIARs provided, it can be seen that the maximum transit time benefits of the proposed Templeogue /Rathfarnham Scheme is predicted to occur at commencement of operation (2028) but **all benefits will be fully eroded by 2043** giving a mere 15 years of very minor benefit. The EIARs completely failed to properly consider the alternatives of Luas or Metro despite the acknowledgement of limited capacity and short term, minor benefits anticipated for the proposed scheme.

Contravention of Dublin City Development plan

The proposed land acquisition/CPOs for road widening is at odds with Dublin City's objectives regarding Z2 Residential (Conservation area) which aims to protect from unsuitable development that would negatively impact the architectural quality and amenity of the area. Similarly, the proposal is at odds with Dublin city Development Plan regarding protection of built heritage and safeguarding of built structures and curtilage that appear of the Record of Protected Structures.

Public Realm - Village area.

Special footpath paving in the village area is welcomed. However, there is a significant reduction of footpath width outside Post Office/Centra on Terenure Road North – the busiest pedestrian area of the village. This which will have a negative impact on circulating pedestrians and village amenity. There is no provision for special road surface denoting the central village area and this would have a negative impact as a special surface would contribute to placemaking and would have a positive impact on slowing traffic.

Summary

The impacts of the proposed scheme are disproportionate to the limited, costly benefits. There has not been adequate consideration of alternatives in terms of other mass transit solutions and a failure to consider more proportionate road designs which would avoid land acquisition and protect the fabric and amenity of the local environment.

Yours faithfully,

Lorna Callanan

We have used the Permanent CPO Land-take drawings and the property widths along the corridor to calculate the depth of land-take at each property.

We include below a 'Before' and 'After' Cross Sectional Profile for each Property.

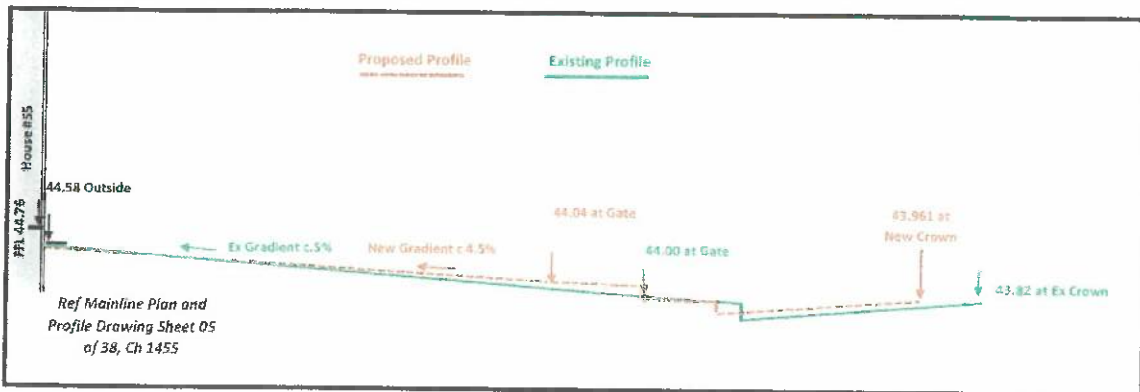


Figure 2 – Profile for #55 Rathfarnham Road

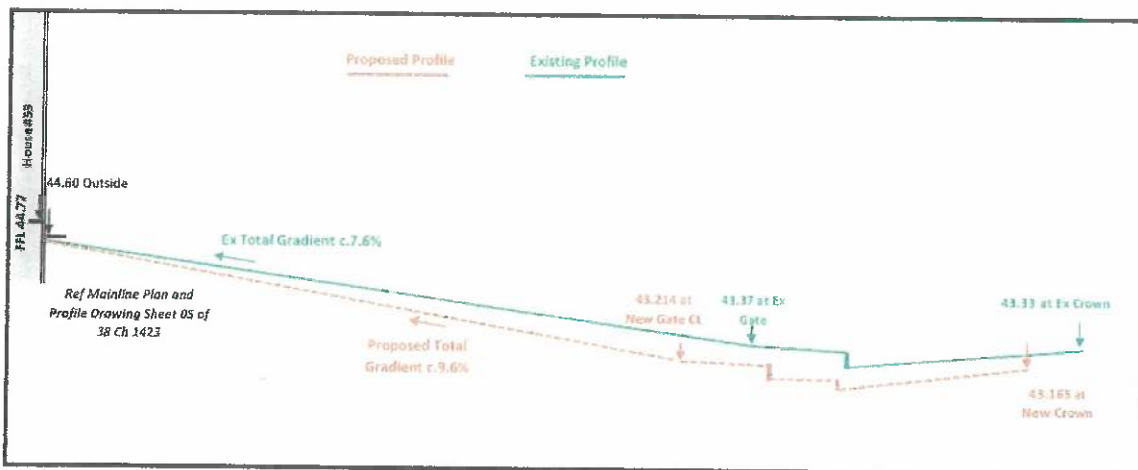


Figure 3 – Profile for #59 Rathfarnham Road

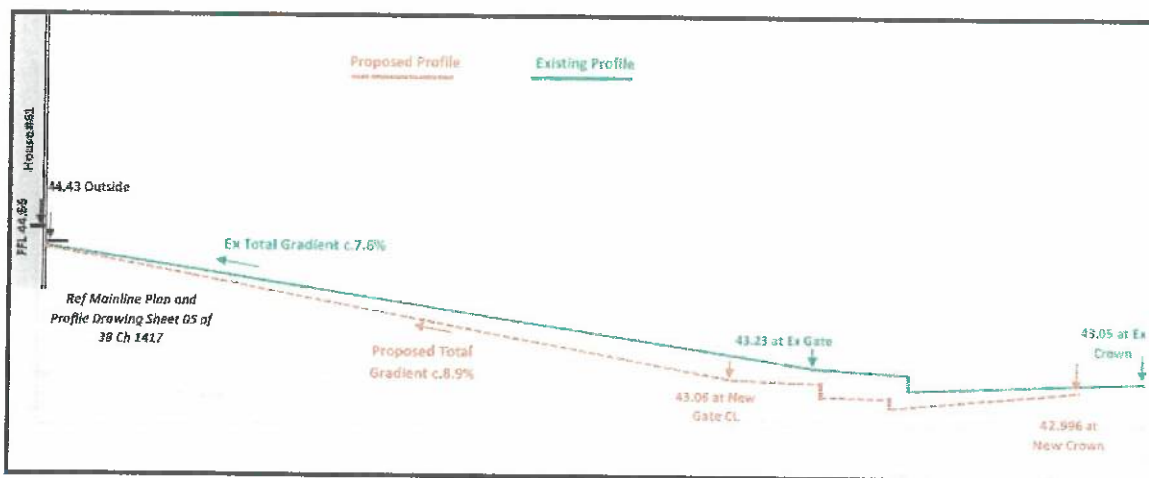


Figure 4 – Profile for #61 Rathfarnham Road

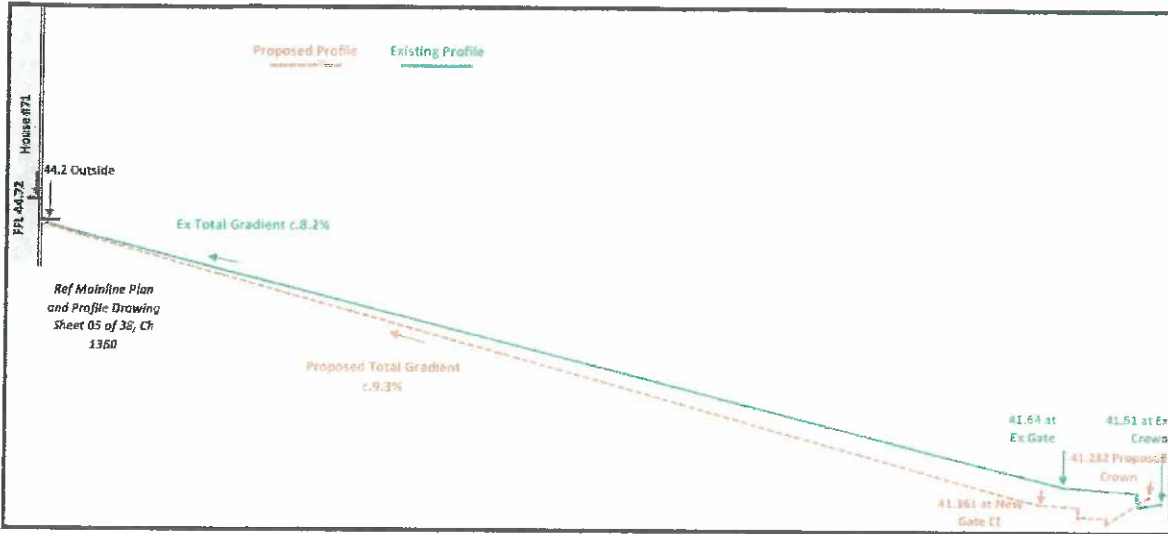


Figure 7 – Profile for #71 Rathfarnham Road

We include below the Summary Table of the comparison of the gradients currently versus post Bus Corridor for each Residence.

Table 1 – Summary of Design Review of Access Gradients

House Details	Current Total Gradient ¹	Future Total Gradient ²	Comment
55 Rathfarnham Rd	5%	4.5%	Improvement
59 Rathfarnham Rd	7.6%	9.6%	Significantly Steeper
61 Rathfarnham Rd	7.6%	8.9%	Significantly Steeper
63 Rathfarnham Rd	6.3%	10.5%	Significantly Steeper
65 Rathfarnham Rd	9.6%	11.1%	Significantly Steeper
67 Rathfarnham Rd	10.6%	13.6%	Significantly Steeper
71 Rathfarnham Rd	8.2%	9.3%	Steeper

¹ – Measured from the existing vehicular gate threshold level to the house doorway ex ground level
² – Using Provided Crown level to interpolate the Future gate threshold level



Part M, the Statutory National Building Regulations specifically states; -

"An extension or a material alteration of a dwelling must not make the building, as a whole, less satisfactory in relation to Part M than it was before. This means an extension or a material alteration of a dwelling need not itself comply with Part M, but it must not result in the dwelling being less compliant than it previously was"

This extract is taken from Page 12 of the National Statutory Document, reproduced exactly below as **Figure 8...**

The Requirements of Part M do not apply to works in connection with extensions to and the material alterations of existing dwellings, provided that such works do not create a new dwelling. However, an extension or a material alteration of a dwelling must not make the building, as a whole, less satisfactory in relation to Part M than it was before. This means an extension or a material alteration of a dwelling need not itself comply with Part M, but it must not result in the dwelling being less compliant than it previously was;

Extract P12 Part M

Figure 8 - Part M Extract Referring to Residential Dwellings