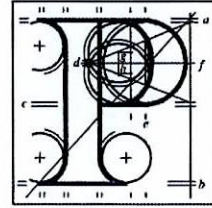


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Mark Duggan and Maria and Brian Bilings  
320 Orwell Park Glen  
Templeogue  
Dublin 6W

**Date:** 15 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 (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the mean time, please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
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<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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

**10 August 2023**

**Submission delivered on-line on 10 August 2023**

**(SID): An Bord Pleanála Ref: Templeogue Rathfarnham Core Bus Corridor 316272**

Dear Sir/Madam

We, Mark Duggan, 320 Orwell Park Glen, and Maria and Brian Billings, 2 Orwell Park Glen, Templeogue Dublin 6W, are writing to submit an Observation regarding the **NTA proposal to An Bord Pleanála Ref: Templeogue Rathfarnham Core Bus Corridor 316272**.

This submission includes the required €50 to cover the cost of this submission and paid on-line.

We are writing to lodge our **objection** to this Significant Infrastructure Development (SID) proposal by the National Roads Authority to ABP Ref: 316227, for the following reasons:

#### **1. BUS MANAGEMENT IN THE CITY CENTRE**

The proposed *BusConnects* Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme (ABP Case No. 316272) ends at the junction of South Great George's Street and Dame Street. This scheme does not show how buses arriving at this junction will then travel through the city centre to their destinations. **This is bad planning as it is not planning at all and, therefore, the application should be rejected.**

The current city-wide *BusConnects* network indicates that buses arriving at the junction of Sth Great George's St and Dame St will turn right and pass through College Green. However, on 5<sup>th</sup> Aug 2023, Dublin City Council, on its web site, states that it is holding "an international competition to procure an Architect Led Multi-disciplinary Design Team for the College Green Dame Street Public Realm Project". This will see the area from the George's St/ Dame Street junction to College Green traffic free.

This would indicate a conflict of intention between the *BusConnects* designers and Dublin City Council regarding what is planned for the College Green area. **Until this conflict is resolved the application should be rejected.**

Should the applicant decide that buses arriving at the Sth Great George's St / Dame St junction will turn left (and head towards Parliament St / Christchurch), the applicant must indicate how the buses will then travel through the city centre. **Without such indication, the application should be rejected.**

In the latest *BusConnects* city-wide network, buses on the G spine (from Thomas St) and D spine (from Cork St/Patrick St) travel under Christchurch Arch onto the north quays. If the



College Green Plaza should go ahead and prevent traffic from crossing it in an east-west direction, buses from the A spine (from Templeogue /Rathfarnham) must then, at some point, join the traffic on the north quays from the G and D spines as well as buses from the B and C spines that service the north and west of the city. The applicant has not explained how the north quays from Ormond Quay to O'Connell Bridge will cope with the volume of buses that will be using this route. **Without such an explanation the application should be rejected.**

All the buses that travel into the city centre along the north quays must at some time return to the suburbs from which they came. If College Green is closed to east-west traffic, the returning bus will most likely be expected to return along the south quays between O'Connell Bridge and Capel Street Bridge / Parliament Street along Wellington Quay. However, the junction of Wellington Quay and Parliament Street is very constricted and has just two traffic lanes with no scope for widening as the footpath is quite narrow at this junction. Buses travelling on the A spine (Templeogue /Rathfarnham) will be required to use this route. **Without an explanation of how the south quays will handle the additional volume of buses that will travel along this route the application should be rejected.**

With regard to the College Green Plaza, it should be noted that previous plans for the pedestrianised plaza were rejected by An Bord Pleanála in 2018, due to concerns about the "significantly negative impacts" it would have on bus movements and on traffic, particularly on the city quays.

## **2. FAILURE TO FULLY EXAMINE ALTERNATIVE MODES OF TRANSPORT**

The NTA failed to examine fully alternative modes of transport e.g. Luas / Metrolink. The ***Metro to Knocklyon Feasibility Study, which was carried out by NTA/Jacobs 2021 was published alongside the Draft Strategy for the Greater Dublin Area 2022-2042. It reported that the continuation of the Metrolink from Charlemont to Ballycullen (Knocklyon) would have a benefit to cost ratio of 0.8:1 and on that basis, NTA did not recommend it.***

Unfortunately, the Metro to Knocklyon Feasibility Study **did not fully examine the continuation of the Metrolink to Tallaght Town Centre.** Tallaght would be recognised as a major attractor, and would be a key element when designing metro systems at both ends of a line. This was a significant **missed opportunity** as it would have maximised patronage in the area with increased economic and social benefits. Tallaght is a major attractor, for the following reasons, as it has:

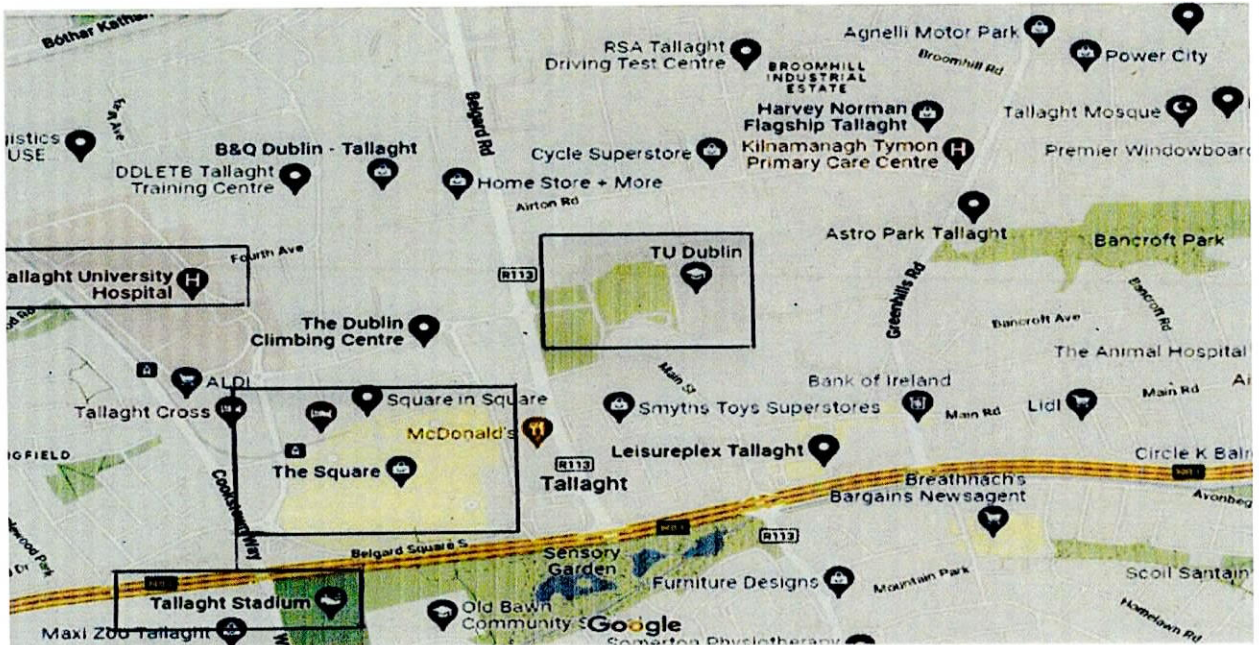
- A significant large and growing population (*greater than Limerick City*)
- a successful accredited university (TUD) Tallaght Campus
- Tallaght Hospital
- Municipal centre
- Large business district
- Football stadium
- Theatre and Library
- Large shopping centre and Cinemas
- Luas Line

The significant merits of continuing the Metrolink to Tallaght (*as part of the Metro to Knocklyon Feasibility Study, NTA/Jacobs 2021*) **should have been evaluated fully by the NTA** and not excluded by finishing the metro journey at Knocklyon (*Journey today 5.4kg-10 mins by car- 30 mins by bus to Tallaght Town Centre*). (*Distances and time using Google maps*)



The proposal made by the **Metro South West Group (MSWG)** was not examined by the NTA as part of the above feasibility study.

**Figure 1.1**



**Table 1.1 Journey times from Swords to the Square today vs with metro**

Mode Option		Time saving using Metro each morning
Current – today <b>Driving to Square</b>	50 mins	
Current – today <b>Public Transport</b> 2 x Buses and Red Luas	1 Hour and 8mins	
<b>With Metro</b>	45 mins	5 mins vs driving  23 mins vs today's public transport
<b>Outcome</b>		<b>Significant time savings using a Metrolink system</b>

As stated previously, social inclusion is cited as one of the reasons why Tallaght should have been included in the Feasibility Study. A person living in Killinardan who uses public transport to get to work in O'Connell Street. Table 1.2 below will show the time required today using public transport and bike vs a Metrolink if (it was available in Tallaght).

**Table 1.2 Travel from Killinardan to the GPO today (by Bike,Luas and Bus)vs Metrolink**

Mode Options		Total Time	Time saving each morning
<b>Today</b>			
Cycle to Tallaght - Luas to O'Connell Street 1 mode change	11 mins 55 mins 5 mins	<b>1 Hour 11 mins</b>	
<b>Using Metro</b>			
Cycle to Tallaght- Metro to O'Connell Street 1 mode change	11 mins 20 mins 5 mins	<b>36 mins</b>	<b>35 ins</b>

**Potential location for Park and Ride and Cycle and Ride station**

The Metro South West Group (MSWG) carried out research on feasibility across the outer suburbs between the Red and Green Luas lines. This research shows that, based on just two potential stations with Park and Ride and Cycle and Ride, substantial time savings could be achieved from a wide area by cycling or driving to a metro station and completing the journey by metro.

MSWG had suggested that stations with Park and Ride and Cycle and Ride should be considered for **Spawell and Dodder Valley Park** . This option should have been given due consideration as part of the **Metro to Knocklyon Feasibility Study, which was carried out by NTA/Jacobs 2021 was published alongside the Draft Strategy for the Greater Dublin Area 2022-2042**. If the northern end of *MetroLink* is to be provided with a Park and Ride facility for 3,000 cars from the M1, why was no Park and Ride projected for the south western continuation of *MetroLink*, to take traffic from the M50 and the N81?

The inclusion of a station at the Spawell Roundabout and Dodder Valley Park, has the potential to facilitate more local employment, thereby, reducing the need to travel towards the city centre.

**3. PROPOSED SIGNALLING AT SPAWELL ROUNDABOUT**

It is proposed that some aspects of the *BusConnect* Corridors will start just after the M50 Spawell interchange. Two buses, one bus from the Square 65 (A3) and the other the 82 (A3) from Killinarden will travel down the R137 to the Spawell Roundabout. It is proposed that:

- the Spawell Roundabout will become a **signalised junction** to cater for some 59,000 motorists with 6 phases of lights for motorists to wait on to change, till they can proceed on their journey;
- Buses will have priority;
- The 82 will now turn left into Wellington Lane and will provide the local link to Square



An unintended consequence of the proposal to put six sets of traffic lights at the Spawell Roundabout will cause significant delays with the slow build-up of traffic along the R137 right back to traffic coming off the slip road down from the M50.

**This is bad planning and bad for the environment due to the high volume of motorists sitting in their cars waiting for the significant number of lights to change with car emissions polluting the atmosphere.**

As it stands, the recent introduction of pedestrian lights on the Wellington lane (both sides) currently causes significant delay to traffic turning left from the R137. There is also the significant likelihood that motorists, to curtail their journeys, will turn left at the roundabout, rather than continue straight to Templeogue bridge. A consequence of this influx of additional traffic on to Wellington Lane, will be:

- (i) the major impact on accessing local schools and GAA clubs located on Wellington Lane; and
- (ii) the significant impact on residents living in the Orwell Park area, if motorists turn left at the Spawell roundabout onto Wellington Lane and then immediately turn right through Rossmore Road to (a shortcut) through the Orwell Park area to bring them out on to the Templeville Road.

A further possible scenario is that any failure in the traffic signalling system or a motor crash, blocking the road at this junction, could, during a period of high volume traffic, result in a backup of traffic including the slip road on the M50. This could possibly result in increased hazard conditions on the M50.

#### **4. IMPACT OF *BUSCONNECTS* CHANGES ON ACCESS TO FACILITIES IN THE LOCALITY OF TEMPLEOGUE**

We believe that the National Transport Authority have not considered sufficiently the negative impacts of the *BusConnects* Templeogue / Rathfarnham to City Centre Core Bus Corridor scheme on local journeys. Many of these local journeys are best facilitated by use of a car because of loads that must be carried or because of medical requirements or mobility impairment. In the table on the following page we have given examples of some local journeys and the considerable extra time and extra distance required to make them.

<b>JOURNEY 1</b>			
Anthony lives near Whitehall Gardens in Terenure and plays boules in Bushy Park. He is not going to walk or cycle. He will not go by bus – that would take forever and would not leave him close. So, he drives.			
<b>Today</b>	<b>Distance Time</b>	<b>After BusConnects</b>	<b>Distance Time</b>
He drives north on Whitehall Road and turns right at Kimmage Road West to the KCR, turns right onto Fortfield Road, left onto Templeogue Road, right into Rathdown Avenue and there is the destination on the right.	2.5 km 6 mins	He drives south on Whitehall Road to Templeville Road, where he turns left. Drives along Templeville Road and Dodder View Road to Pearse Bridge in Rathfarnham, turns left onto Rathfarnham Road, left into Rathdown Park and left onto Rathdown Avenue.	5.5 km 12 mins
<b>JOURNEY 2</b>			
He wants to do the weekend shopping in Lidl in Terenure.			
<b>Today</b>	<b>Distance Time</b>	<b>After BusConnects</b>	<b>Distance Time</b>
He drives north on Whitehall Road and turns right at Kimmage road West to the KCR and along Terenure Road West to Terenure Cross, turns right onto Rathfarnham Road and the destination is on the left.	1.8 Km 10 Minutes	He drives south on Whitehall Road to Templeville Road, where he turns left. Drives along Templeville Road and Dodder View Road to Pearse Bridge in Rathfarnham, turns left onto Rathfarnham Road and the destination is on the right.	4.9 Km 12 Minutes
<b>JOURNEY 3</b>			
He wants to visit the doctor at the Kimmage Family Practice on Lower Kimmage Road.			
<b>Today</b>	<b>Distance Time</b>	<b>After BusConnects</b>	<b>Distance Time</b>
He drives north on Whitehall Road and turns right at Kimmage Road West to the KCR, turns left and the destination is on his left.	1 km 3 mins	He drives north on Whitehall Road and turns left onto Kimmage Road West, turns right onto Lorcan O'Toole Park, along Stannaway Road, right onto Sundrive Road, through Lower Kimmage Road junction into Larkfield Park, right into Larkfield Grove into Derravarragh Road, right into Corrib Road where he parks.	3.5 km 10 mins

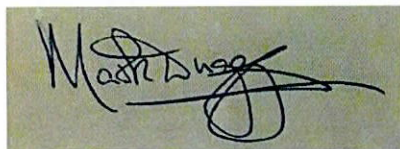
Distances and times using Google Maps

Because of the impact on local journey times on what are today simple journeys, we believe that discourage social interaction particularly among the elderly or those who have impaired mobility. **Therefore, the application should be rejected.**



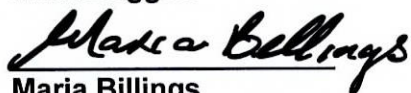
This submission is made to An Bord Pleanála in good faith and out of concern for the future long term adverse implications of this proposal by NTA in relation to **Templeogue Rathfarnham Core Bus Corridor 316272**. We believe that this proposal will have a significant negative impact, *if implemented*, in the years to come and will not have the desired positive outcome as predicted. We thank you in advance for considering our submission.

Yours sincerely

A rectangular box containing a handwritten signature in black ink. The signature is cursive and appears to read 'Mark Duggan'.

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Mark Duggan

A handwritten signature in black ink, cursive, reading 'Maria Billings'.

Maria Billings

A handwritten signature in blue ink, cursive, reading 'Brian Billings'.

Brian Billings