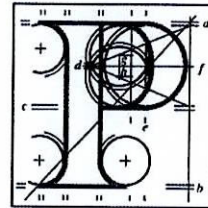


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Mary Dunning
34 Whitehall Road
Terenure
Dublin 12

Date: 17 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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34 Whitehall Road
Terenure
Dublin 12

14 August 2023

To An Bord Pleanála

**BUS CONNECTS SUBMISSION TO AN BORD PLEANALA IN RESPECT OF THE
TEMPLEOGUE/RATHFARNHAM TO CITY CENTRE CORE BUS CORRIDOR**

AN BORD PLEANALA CASE REFERENCE HA29N.316272

My name is Mary Dunning and I am a resident of Whitehall Road, Terenure, Dublin 12. I wish to make the following comments in relation to the above.

At the outset, I wish to commend the NTA and local authorities for the good work that has been done in improving transport infrastructure in the Dublin area, particularly with regard to cycling. As I have recently bought a bicycle, I am experiencing first hand the benefits of these improvements.

However, I have serious concerns about some of the elements of Templeogue/Rathfarnham to City Centre Core Bus Corridor plans as set out below.

Disproportionate focus on commuters to city centre over communities

The aim of the scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region which will enable and deliver efficient, safe and integrated sustainable transport movement along the corridor.

However, transport is not just about moving in and out of the city. Within the Crumlin, Kimmage/Terenure/Rathmines areas, a lot of work has gone on in the last few years to build communities and enhance the areas we live. This became all the more important during COVID when we were essentially locked into our areas and realised the value of buying local, supporting local businesses, appreciating all the various parks and amenities which made life bearable during that difficult period. However, there is little improvement planned in the provision of cross suburb bus services to facilitate this movement. Also, is it not always possible or appropriate to use public transport or bicycles to carry out general day to day business.

The plans included in this scheme (Corridor A), along with the schemes for the Kimmage Corridor F and the Greenhills/Clondalkin D plans, if implemented, will have a detrimental impact on these communities.

'A' Corridor main impacts:

- The closure of the Templeogue Road 14 hours per day x 365 and the displacement of some 7,000 vehicles a day.
- The Closure of Rathmines Road 14 hours per day x 365 at St. Mary's College and displacement of some 9,000 vehicles a day:
- The resultant need to divert to the heavily congested Castlewood Avenue, which is also an Orbital Route.

- The one-way inbound system on the Rathgar Road necessitating the use of the heavily congested Upper Rathmines and Highfield Roads for all outbound journeys.
- The change to a signalised junction at the Spawell Roundabout.
- The numerous Right Turn Bans.
- The removal of 1 of the outbound bus stops on Georges Street.

'D' Corridor main impacts:

- Walkinstown Roundabout reduction from 3 lanes to 2.
- Upper Clogher Road closed to General Traffic.
- The creation of Cul-de-Sacs to prevent entry to the Crumlin Road.
- Right Turn Bans.
- Slip road closures.

'F' Corridor main impacts:

- The closure of Lr. Kimmage Road from 6 am to 8 pm x 365 to General traffic from Ravensdale to Harold's Cross.
- Evening traffic will be impacted between 4 pm to 8 pm.
- The removal of 3 slip roads at the KCR traffic lights.
- Closure of a section of Kenilworth Road to General Traffic.

As a result of the above, the prospect for the localities is very negative, with residents' daily lives to be thrown into turmoil. I can only imagine what a nightmare it will be to move around the area with the proposed changes.

For An Bord Pleanála to carry out its appropriate consideration of the schemes, it therefore needs to look at the three schemes and their combined impacts together, rather than look at them one by one in isolation.

As referenced above, the proposed schemes involve the partial or total closure of parts of traditional thoroughfares to normal car traffic, forcing cars and trucks into other less suitable roads to reach their destinations. The schemes also involve the elimination of right hand turns into some roads, which hugely impacts on the ability of residents in the area to move around. Some roads in residential areas will be closed to additional traffic, while other areas, like Whitehall Road where I live, will be hugely impacted by additional traffic being funnelled from other areas. Specifically for Whitehall Road, traffic will be funnelled from the Spawell Roundabout that can no longer access other routes. Dedicated cycle lanes are also to be introduced on Whitehall Road. This means that for the residents on Whitehall Road alone, the schemes will result in increased traffic (including trucks), increased cyclists, the reduction (if not the elimination in the future) of parking on the road (a residential road), narrow lanes for both cyclists and road users, which will be all the closer to

pedestrians on the footpaths. The road is not as wide as other roads that have been upgraded recently with dedicated cycle lanes on both sides of the road, hence the proposal to have the two cycle lanes on one side of the road.

While bus services into the city centre are also set to increase, we already had a good bus service on the road in previous years. The problem we have had in recent times has been the unreliability of the service, hence some users have had to resort to cars when busses have not arrived.

With these changes, there will be a build-up of traffic on the road, thereby increasing greenhouse gas emissions and negatively affecting air quality. Some years ago, I participated in an air quality study and the results were good for the road. However, this is unlikely to continue into the future with the proposed changes. It is difficult to understand how these plans align with climate change ambitions. The fact that residents in the areas will have to, in some cases, double their journey times and distance to reach their destinations due to the changes in the road network, never mind the increased traffic congestion on a reduced road network, would also appear to be contrary to achieving climate change ambitions.

Also, as mentioned, two cycle lanes are to be introduced along one side of the roadway. However, there will be no real segregation at the top of the road where it is most dangerous for cyclists. In fact, at a recent residents meeting, cyclists were at pains to say that they have never had difficulty cycling down Whitehall Road, just at the junctions at the top of the road with Wellington Lane and Whitehall Road West where there will be minimal improvement.

It is therefore difficult to see how the schemes will result in delivering an efficient, safe, integrated and sustainable transport movement for our locality. The effects I listed for Whitehall Road can be replicated for a number of other roads similarly impacted by the schemes as mentioned above.

And yet, based on the documentation provided, I understand that the expected improvement in bus times travelling to the city centre will be around 4-6 minutes. And then there is the projected cost of the scheme which is hugely significant. I therefore strongly believe that further consideration needs to be given to the impacts of the proposed schemes on communities and residents living in the localities most affected and how they balance against the projected improvements in transport.

Need for updated traffic modelling

The traffic modelling done for these schemes was undertaken prior to COVID 19. However, there are significant changes in the way we now live and work due to remote working. On that basis, I believe that further modelling is needed as a matter of urgency before any decisions can be made by ABP. Otherwise, it will be making decisions of a very serious nature based on outdated information. I also believe that such updating in modelling would better support the case for Metro West. While delivery would be some way off into the future, at least the planning could commence now and whatever is decided with Bus Connects would tie into the longer-term plan for Metro West. This would provide a more suitable alternative to ensure the NTA's ambitions are met for sustainable transport in the long-term. I am at a complete loss to understand how there seems to be a reluctance from planners to this project in the area, while other areas in Dublin are being better served by Luas and the Dart - the Kimmage/Terenure/Rathmines area is completely left out like the Bermuda Triangle.

Conclusion

I hope that ABP will take account of the points raised above and consider whether the benefits of the proposed schemes merit the complete pulling apart of communities as envisaged – inability to move

in our locality with roads blocked off, journey times and traffic congestion doubled, difficulties in accessing health services and local parks, air quality diminished, fuel consumption increased, longer journey times for school going children unable to access public transport, local businesses going into decline on affected routes, etc.

Bus Connects generally is supposed to be positive for Dublin. However, I can safely say that for the majority of the residents in the Crumlin/Kimmage/Terenure/Rathmines areas, it conjures up nothing but negative vibes. No other areas in Dublin will be similarly impacted by these schemes. I fully understand the need to reduce the use of cars for climate change reasons. However, there are other ways to achieve this aim without strangling communities, closing/limiting access across the road network, and affecting the most vulnerable who are not always able to use public transport. Despite plans to compulsorily acquire land from residents to facilitate some road widening, there will be no consistency in the provision of the various traffic lanes which will still result in bottlenecks. The look and feel of our neighbourhood, however, will be changed forever and not in a good way.

As an alternative, I request ABP to consider the following:-

- The introduction of a congestion charge for Dublin City Centre during peak times – this would remove a number of cars from the roads with immediate effect to free up space for buses and cyclists;
- Require Government Departments to close their car parks with the exception of car spaces for the disabled/emergencies;
- Require the NTA to undertake updated traffic modelling in the area;
- Require the NTA to review the case for Metro West;
- Require NTA/local authorities to provide dedicated cycle greenways along the Dodder into town for improved safety;
- If bus gateways have to be introduced, limit it to peak hours only, Monday to Friday (there are completely different traffic patterns on the weekend).

I hope that ABP will give favourable consideration to the above submission.

Yours faithfully

Mary Dunning