Our Case Number: ABP-316272-23

Planning Authority Reference Number:

An Bord Pleanála

Melisa Kearney
26 Templeville Road
Dublin 6W
D6WRX57

Date: 16 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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Bus Connects Submission to An Bord Pleanala in respect of the Templeogue/Rathfarnham to City Centre Core Bus Corridor

Bord Pleanála Case Reference: HA29N.316272

Written By Melisa Kearney

Home Address: 26 Templeville Road, D6W RX57

Email: [redacted]

Tel: [redacted]

I am confining my observations in the main to those areas of this corridor that affect the me as a local resident. I am aware of Senator Mary Seery Kearney personal submission which has over 115 signatures.

FLAWED INITIAL PREMISE

The objectives of this planning application as stated by the National Transport Authority must be a central basis by which adjudication of proportionality is measured. The cost of this corridor is significant in terms of the compulsory purchase of land along the route, the build cost and all of the fees including consultancy, design and legal fees. Their stated aim is as follows:

*The aim of the Proposed 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. The Proposed Scheme is a key measure that delivers on commitments within the National Development Plan (2021-2030), the Transport Strategy for the Greater Dublin Area (2022-2042) the Climate Action Plan (2023) and the National Planning Framework 2040*[1]

The key measures therefore are: efficiency, safety, integration, sustainability.

[1] Home - BusConnects Dublin - Templeogue/Rathfarnham to City Centre (templeoguerathfarnhamscheme.ie) cover page

If we are to break that down into its component parts, it immediately becomes clear that the cost and reduction in quality of life and environmental impact far outweighs any theorised improvements.

With regard to environmental impact:

A considerable amount of tree removal will take place – at Rathfarnham Castle Park, Rathfarnham Road, possibly on Templeogue Road and at Rathgar Road.

There will be a particularly significant impact from an environmental perspective at Rathfarnham Castle Park, where a large section of woodland area of up to 10 metres in width by roughly 400 metres in length is set to be removed in order to widen the Grange Road. This particular woodland area borders a peaceful Woodland Playground and natural play space, which is particularly valued by autistic children and families. It contains very many mature trees which will be lost if these plans go ahead. This area is also an important breeding habitat for many protected species including bats, frogs, tufted ducks, mallards and very many protected wintering birds, however it has not been subject to proper environmental surveys in relation to most of these.

There is also an important watercourse, the Whitechurch Stream, which runs under the Grange Road into the Park where it feeds and drains the duck pond and exits again close to Butterfield Avenue. This is very important from a hydrological perspective, yet has not been identified or assessed in the hydrological or hydrogeological assessments. It is an open watercourse at many points within the Park. Overall, it appears that this particular area, Rathfarnham Castle Park, which is proposed to be very significantly impacted by the Scheme proposals, has been almost entirely overlooked in relation to environmental assessments, despite being a significant wildlife habitat and very important public amenity, particularly for local autistic children and families.

On the basis that

- there will be reduced access to traditional thoroughfare roads
- every journey is not into the city centre but quite a substantial number are cross town
- there is little or no cross suburb route network in most areas - in this regard a very reasonable request for an S route on the St Peter's Road, Templeville Road alignment was refused and I am aware of a Submission by "Future of Dublin for a single decker served orbital route[2] that might be what is being sought but which would require significant public engagement were it to be accepted) The only remotely relevant orbital S route is heavily reliant on Terenure Road West and I address the implausibility of that later in this submission
- there is a proximity of schools in a very small triangle accessed by the remaining through roads
- this small triangle is a residential area impacted by not just this bus corridor but three bus corridors (when Clondalkin/Greenhills/Crumlin and the recently published Kimmage corridors are taken into account)

there is a likelihood that a lot of essential car journeys will flow through a very small number of roads rendering them stationary due to sheer traffic volumes

[2] www.futureofdublin.ie www.futureofdublin.ie/templeogue3.html

The NTA, by their own admission state that the roads surrounding the main corridor will have increased volumes of traffic (albeit it is contended that their own figures are flawed) for example (all cited as pm peak times unless otherwise stated):

Harold's Cross Road	1,017 increasing to	1,265
Rathdown Park	189 to	305
Rathdown Park	116 to	240
Clareville Road	701 increasing to	854
Larkfield Ave	903 to	1,076
Larkfield Park	700 to	849
Kenilworth Park	760 increase to	885 am
	719 to	893 pm
Kenilworth Sq N	381 to	511 am
	348 to	474 pm
	330 to	498 pm
Kenilworth Sq South	145 to	330
Kenilworth Road	348 to	481
Leicester Ave	171 to	343
Harolds Cross Road	1,017 to	1,265 am
	889 to	1,068 pm
Frankfort Ave	120 to	311
Palmerston Park	853 to	1,028 am
	802 to	1,040 pm
Palmerston Road	108 to	304
Orwell Park	585 to	736 am
	372 to	575 pm
Orwell Road	1,307 to	1,507 am
	1,326 to	1,457 pm
Dartry Road	896 to	1,296 am
	901 to	1,237 pm
Castlewood Avenue	619 increasing to	824 am
	614 to	836 pm
Castlewood Park	23 to	144
Church Avenue	185 to	290
Grosvenor Road	402 to	637 am
	354 to	563 pm
Grosvenor Place	435 to	646
Leinster Road	218 to	499
	320 to	591
	207 to	369
Belgrave Sq East	122 to	228
Belgrave Sq North	640 to	873 am
	614 to	894 pm
Dunville Ave	357 to	510

Rathmines Road Upper	621 to	735
Ranelagh	882 increasing to	1,230 am
	837 to	1,318 pm
Ranelagh Road	970 to	1,349
	1,227 to	1,442
Northbrook Road	260 to	369
Appian Way	691 to	802
Charleston Road	779 to	971
	694 to	1,058
Ashfield Road	363 to	495
	330 to	458
Beechwood Road	426 to	543
Mountpleasant Place	147 to	354
Oxford Road	155 to	270
Cullenswood Road	756 to	1,114

Rathgar Road will be a prohibited route outbound, up to 9,925 vehicles that use this route will have to find a different route, as will the up to 522 lorries. *I am relying on a constituent for the 9,925 and 522 numbers and other similar numbers in this document. The traffic surveys conducted by NTA are unintelligible and should have been presented not least to assist you in a format where these daily numbers are clearly stated.*

Kenilworth Road will be a prohibited route at the five way junction, the cars that use this route will have to find a different route as will the lorries. No data is available on this.

Highfield Road is likely to get increased traffic including the lorries, as it seems to be the likely preferred option for accessing Rathgar from Rathmines.

Rathmines Road will be a prohibited route, up to 9,731 vehicles that use this route inbound and up to 9,916 vehicles that use this route outbound will have to find a different route as will the up to 73 inbound lorries.

Traffic will be forced to turn left at the triangle in Ranelagh, it seems likely that all roads in the Dartmouth Square area will have significant extra traffic accessing Leeson Street.

Every one of those extra vehicles passing through a residential area is a possibility for an accident to happen. They will impact on residents trying to access and exit their homes. It will lead to increases in stationary traffic due to sheer volumes, all affecting the environment and air pollution.

There are also journeys in the opposite direction to town. Many residents travel out of the city towards the centres of business such as CityWest, Robin Hood Industrial Estate and to colleges such a TUD Dublin, Tallaght Campus. Existing and increasing populations will need access to a means of transporting themselves to these centres of education and employment. The corridor plans do not take account of any of these needs and the bus network plans assume people will be willing to change buses not just once or twice but up to three times in order to get to their desired location. The fact is that they won't do that, they will take cars and there will be an increase in car volumes on many of the now proposed more limited arteries to these destinations.

The environmental cost of air pollution must be factored into this equation and there is guaranteed to be an increase in same, thereby defeating the macro reasoning behind these schemes in the first place. The sustainability reasoning simply doesn't exist.

Environmental Impact Assessments should be obliged to consider the accumulative effect of all of the bus corridors, not merely each one in a silo, that is neither accurate nor reasonable.

Walking

I have often walked to the city centre from Templeogue and vice versa, there is no shortage of well-lit footpaths and safe pedestrian crossings all along the way. There are concerns at a local level regarding the diminution in safety at evening and night time brought by the introduction of LED lighting and the fact that the light spill and consequently light trespass is significantly reduced. While this is good news for neighbours and lends itself to greater efficiency in light management, the diminution in street lighting has meant that some members of the community will not venture out during the times they are reliant on street lighting – these include lone walkers, women and people with sight impairments who find the LED has seriously curtailed their visibility. Nothing in these plans significantly improves or to be fair reduces walking infrastructure. Therefore, this objective cannot be asserted with regards to this corridor as an improvement.

Cycling

There is no doubt that the corridor as designed delivers a significant increase in much needed segregated cycling infrastructure. I have recently taken to cycling and am all too personally aware of the need for segregated cycling lanes and this plan delivers significantly in that regard.

However, there are two obvious flaws to the scheme as set out which must be considered against the objectives of the entirety of the scheme as they conflict with the provisions of the National Cycling Manual[3], a publication of the applicant, the National Transport Authority.

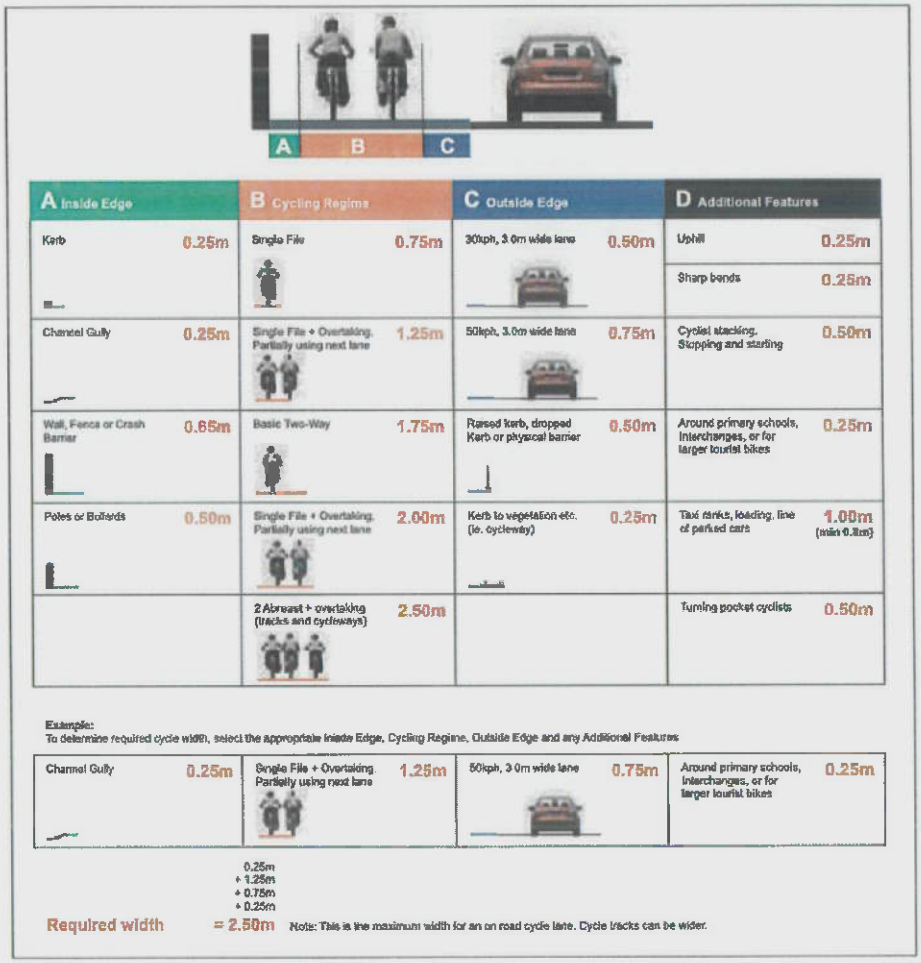
1. The provisions of the manual state:

   The principle of homogeneity is that reducing the relative speed, mass and directional differences of different road users sharing the same space increases safety. This has a beneficial impact on the level and severity of accidents that might otherwise occur. Where the relative speed, mass or direction is not homogenous, different road users may need to be segregated.
   And in addition to that in the context of the needs of cyclists it states: *The cycling network should link all main origin and destination zones / centres for cyclists. A well-targeted cycle network should carry the majority of cycle traffic (in cycle-km terms).*
   Cycling routes within the network should be logical and continuous. Delays, detours, gaps or interruptions should be avoided. Markings and signage should be clear and consistent...

   Continuity of Route: It is illogical to discontinue cycling provision near busy destinations to accommodate or maintain other traffic flow

[3] https://www.nationaltransport.ie/wp-content/uploads/2013/10/national_cycle_manual_1107281.pdf

The segregated cycling tracks are not continuous along the CBC routes. There are sections of road where segregated cycling lanes cease altogether in order to prioritise bus lanes. This is a very significant flaw that prioritises the minutes shaved off bus journey times (a theorised objective that only impacts during peak traffic travel times, if at all) over the safety of cyclists who are obliged to road share without segregation for significant sections of the road on a 24/7 basis. The balance is completely wrong to prioritise bus routes where the demand fluctuates over cycling where the need is 24/7. There are attendant roads that will have no cycling infrastructure at all, for example, there will be no cycle lanes on Terenure Road East. Cyclists will use the bus lane as far as St Joseph's and then be forced to use the general road, see maps 6 and 7 in the General Arrangement for proof.



2. Also of concern is the fact that considerable advertising monies are spent on ensuring that cars leave adequate room for cyclists when passing them out, and rightly so. This becomes a non-issue when you have continuous segregated cycling lanes and lends itself to the fact the urban traffic is going to travel in closer proximity to cyclists, hence the need for segregated cycling as a safe area for cyclists who are the more vulnerable road users. However, the width of cycling lanes as set out in the National Cycling Manual, should be 2 meters to accommodate the space for the cyclist themselves, wobble room, the space to the left of a cyclist that must accommodate gullies and drains and the space to the right of the cyclist that will come into the proximity of other road users. This minimum of 2 meters is not reached throughout whole sections of the proposed cycle tracks. This means that cyclists are obliged to travel less that

the recommended space on the road alongside traffic that can quite often be less than mindful of their needs. See figure above.

3. The seriousness of supporting the change to cycling needs to be measured when we have a situation where on-street bike storage is more expensive than the cost of a residents parking permit.

"... 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"

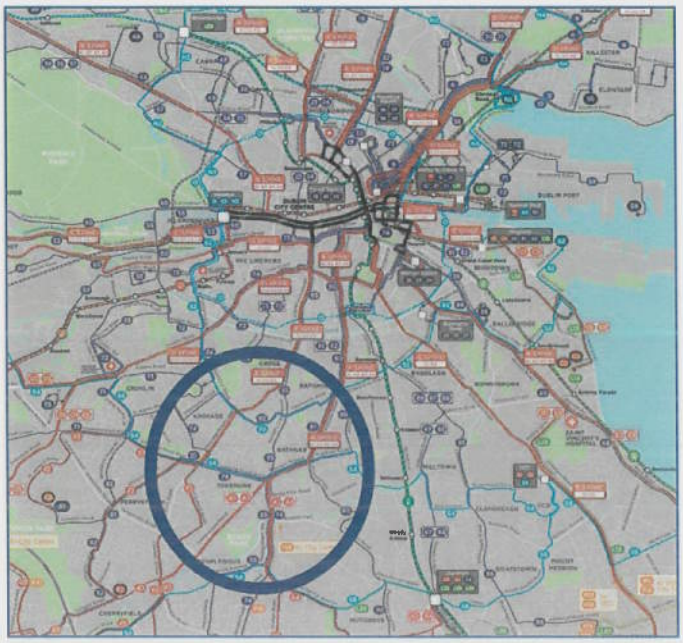
A key issue with this statement of the NTA objective is that while it may well deliver bus infrastructure along the corridor, the reality of which is disputable, and perhaps it delivers integrated sustainable transport movement along the corridor, it does so at a significant cost to all other transport movement in the peripheral road network surrounding the corridor.

I have never understood why, given that the objective was to change transport modalities, why other measures such as for instance congestion charges, subsidised or free bus services and a proper on street or underground metro system did not have to be disproven as a real alternative before such a costly plan was rolled out. The view that this is the only way to achieve the objective without being obliged to model the collective impact of other measures is shockingly disproportionate. Nowhere is the rationale of choices made set out, at least if they were explained there might be a greater possibility of buy in. Instead, there are no objective comparisons, even the feasibility study of the alternative South West Metro had its terms of reference gerrymandered by the NTA to a point that the outcome of the report was bound to be inadequate. The blatant lack of any engagement on any alternatives is not just maddening but also legally arguable.

It is not just residents in these suburbs who use public transport, people coming to Dublin for matches, music gigs, hospital appointments and a plethora of other reasons also come to Dublin and a significant portion come by car. If the bus infrastructure is envisaged as a 24/7 travelling system, then why are there no plans for park and ride opportunities throughout the entire bus corridor network – there isn't one!! If the bus gates are needed for Sunday traffic then accommodate all Sunday traffic including those who travel to Dublin for events.

There is a huge need for sustainable public transport and I agree that an enormous level of change is needed to achieve it, this application should be about whether this is the right change or the best change to make in order to achieve that objective.

The network planned is as follows:



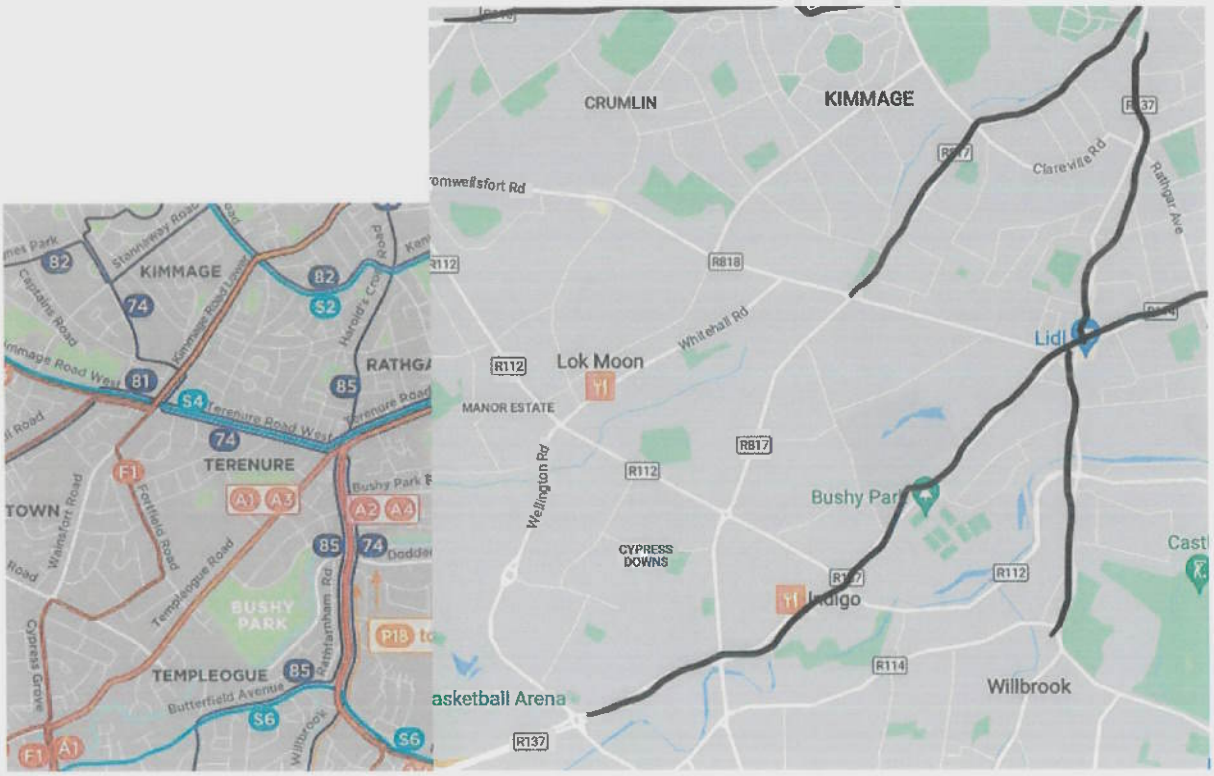
The area of this corridor is the one that will provide the A spine. However, this must be viewed in the context of the F and D spine also. Roads along which the A and F spines will run in the areas within the oval shape will be effectively be closed to all other traffic between 6am and 8pm seven days per week by the bus gate. A substantial number of residents within that area will require access and egress but will be denied the right hand turns into alternative routes leaving some narrow residential streets as rat runs to cut across the closed roads and work around them.

The map below with the black lines is drawn to demonstrate that a very small area is affected by the bus corridors, drawn in black lines, with the attendant bus gates. What is not drawn is the other changes and the increasing traffic in the peripheral roads. There is a heavy concentration of bus corridors influencing a small area outside of the city centre, this is unusual across the entirety of the network and creates a disproportionate burden on the communities living there.

The map with the F1 bus route shown below on Cypress Grove Road and Fortfield Road, shows the only viable alternative for access to the city centre, hospitals, etc for that area and it will be accompanied by all of the traffic that is diverted from the Bus Corridor under consideration and it will be limited by the Kimmage Bus Corridor, where the red line for the F1 thickens. As the surrounding roads are either not accessible at all because of a bus gate, or barred from access due to the implementation of a ban on right hand turns, this route will be overpopulated with traffic, and yet this is a significantly increased bus route. This might be bearable if it were during rush hour/peak traffic times only, but it isn't – it's from 6am to 8pm every day of the week. The timing of the bus gate is nonsensical and an unnecessary diminution of the quality of life of the residents in that area. Residents will have to drive much longer routes to gain access and egress from their roads and to access hospitals, doctors, dentists, schools and shopping areas.

Meanwhile the 54A bus route as it was, proposed now as the F1, will be removed from its route along Templeville Road, a cause of much distress to elderly residents on Grosvenor Court off Templeville Road, who until now have ease of access to this bus route but under new plans will have to walk a considerable distance. This bus route will no longer travel the road outside Templeogue College, removing that direct connectivity up to a road running perpendicular to Templeville Road. Its route

along the section of Templeville Road it traverses, Fortfield Park where there are two schools St Pius X boys and St Pius X girls national schools, Fortfield Road where there is Terenure College as well as the drop off for Our Lady's School on Templeogue Road and now no right hand turns into Greenlea Road or Lavarna Grove, will be clogged with the traffic that would have otherwise been able to travel along Templeogue Road. The traffic surveys carried out show that up to 7,404 vehicles that currently use Templeogue Road 300 of which is lorries, will be prohibited from so doing due to the bus gate. 1,440 vehicles will remain on Fortfield Road as they will be prohibited from going down Greenlea Road – that is how many vehicles will be trying to turn right towards the KCR now and causing that backlog of traffic. That is a considerable displacement from those two roads alone that will now be using the route alongside the F1 bus route. This alone demonstrates that the objective as set out will not be achieved for this section of road.



Flawed Public Consultations

There is no doubt that some changes have come about due to public consultation and public representative lobbying including my own. However, the applicant states that they engaged in stakeholder consultations and set out the dates for same. Two of the three public consultation periods took place at the height of the covid pandemic and physical public meetings could not be held. Meetings were held on line and engagement was very strictly controlled. This does not constitute public engagement.

While the period for observations to An Bord Pleanala was extended due to a typographical error by the application, the fact of an ability to make an observation must be seriously challenged. The documentation attendant to this application is considerable by any standards. Ordinary citizens are expected to unpack and piece together implications of these changes in order to render themselves

able to envisage the impact on their lives and comment on it. It is a completely unsatisfactory and unfit for purpose means of providing for the input of the public.

I acknowledge that you will never get 100% public buy in and that change management is challenging when dealing with the public. The fact that it is challenging is not an excuse for bullying through a scheme, in fact three schemes that disproportionately affect a small area. The NTA have consistently bullied through these changes from a perspective of "we know best", and the Minister has washed his hands of any calls on him to ensure that it is more democratic – and he is a TD in a large part of this route! The methods deployed by the NTA have been appalling. In many instances their engineers do not know best and their cited stakeholder consultation is deeply flawed and misrepresents the reality on the ground.

Engaged meetings with a collective of representatives Residents Associations all in the same room at the same time would have been effective and constructive. That never happened! The Preliminary Design Report for this corridor cites stakeholder engagement and lists representatives groups – representatives of what? In many instances when requests went in for meetings with Residents Associations, this was rejected and Residents Associations were met on a one to one basis, never as a collective. Consequently, arrangements are included that favour one residents group at the cost of others. Again this cannot possibly constitute adequate stakeholder consultation. I believe that the NTA has left themselves wide open to a challenge under the Aarhus Convention for a failure to properly engage in public consultation.

I have a plethora of emails from bus drivers employed by Dublin Bus and Go Ahead – none of whom were consulted in the course of this process. I have searched the 325 page document Preliminary Design Report for the words "Dublin Bus" and they appear once! That is on page 88 in the context of the discussion on bus stops. Why weren't bus drivers consulted for their views on how improved travel times might be achieved?

If affected Residents Associations and bus drivers weren't engaged with in any meaningful way in the course of this process, as two groups who could have given the best insight into how to achieve the objectives, then on what basis was the contributions of the other stakeholders taken on board. Are they not theoretical merely rather than having the lived experience of how things are and how they might be improved? It is scandalous that these two groups were not meaningfully engaged with.

With due respect to An Bord Pleanala, it is very difficult to imagine how you might go about your adjudication on this planned route. This isn't a planning application for a residential development where the rules of engagement are clear and consent by reference to planning law can be anticipated. The methodology of adjudication should have been published so that the public could know how to make observations within those criteria. Very little is known about how An Bord Pleanala will go about the review of this planning application. The An Bord Pleanala criteria and methodology should have been published and therefore even this phase of the planning process is deeply flawed. Is every proposal under scrutiny and what will be the rationale for their acceptance or refusal?

Amendments to turns and road markings usually undergo a process within the Local Authority that involve public input, Local Authority input and Garda Siochana input – this methodology has a proven track record of being able to take into account the very localised consequences of any changes. Yet this methodology is nowhere in evidence within the plans and it is not clear if An Bord Pleanala will

take this into account or how they might go about it if they were even minded to do so. It is my view that this application lends itself perfectly to an oral hearing so that amendments could be made at that level of minute details.

Bus Stops

A considerable number of bus stops are being removed. This alone would bring about shorter journey times as the bus isn't stopping as much as it would otherwise be. It is a deceptive and scurrilous action in journey time reduction and does not in any way consider the walking times of elderly or infirm passengers. For example:

- Outbound bus stop at Westbourne Road removed
- The inbound bus stop at Lakelands Park will be removed
- The two bus stops at Our Lady's will be consolidated into one with no bus shelter. These are busy stops for children alighting to go to school.
- Bus stop at Rathmines Park inbound and outbound removed. It will be necessary to walk to Circle K
- Bus stop at Garville Ave inbound removed to Winton Avenue
- Outbound bus stop at Brighton Road removed
- Inbound bus stop near Brighton Road moved to Rathgar village

The bus stop on Templeogue Road at Bushy Park and Terenure College is being consolidated with the bus stop currently opposite Springfield Road – reducing two bus stops into one. There are a number of issues with this change that really illustrate how completely improbable the plan is when compared to the on the ground lived experience. The issues are as follows:

- The area of the road it is being moved to outside number 217 is on a part of the road prone to flooding and where the footpath is very narrow. They need to address the flooding issue when making this change, if the change is needed at all.
- The inbound bus stop is being relocated to a location close to the traffic lights at the junction of Templeogue Road and Fortfield Road, there are three problems with this:
    - There is an estate of houses and apartments on the grounds of Bushy Park House as well as Our Lady's School. There is a filter light turning right for inbound traffic into the estate and turning of the school drop off. Cars will be unable to pass any buses out at that bus stop because they will be impeded by cars turning right into that estate.
    - The volume of traffic turning left at those lights will be much higher due to the Templeogue Road/Terenure Place bus gate and the extra traffic volumes now will be impeded by a bus or buses stopped at the bus stop.
    - This will seriously impede the residents from those houses between the bus stop and the traffic lights from accessing and exiting their homes as it is more likely that buses will be stopped at the bus stop or the lights.

The original location meant that buses did not impede the flow of traffic as the road is wide enough to safely pass out. This is a ludicrous suggested change and bears no sense in the lived reality of using that road either currently or in future proposals. It is yet another an example of the local knowledge that is required to ensure that the changes being proposed are correct and warranted. Local residents

have made their own individual submissions and they are proposing that the bus stop at Terenure College is retained and either retain the existing bus stop at its current location or question whether there is a need at all to have a bus stop along that section of road at all.

The bus stops on the Rathfarnham Road are also being changed. One is being removed to be closer to the junction of Rathfarnham Road with Dodder Park Road. I want to remind the planners that this is the same section of road that saw the viral video of a Bus mounting the pavement out of sheer frustration and that is before the increase in traffic volumes that are bound to occur on Rathfarnham Road with the additional traffic diverting there through rat runs and from Butterfield Avenue where they will divert to in order to avoid the new Templeogue Road restrictions.

I understand that there is an impetus to have bus stops located nearer to pedestrian crossings as only then will people actually use them. However, behavioural change can be countered with a public information campaign, I would note that the rise in road traffic deaths is not occurring because of people not using pedestrian crossings, so a persistent campaign on television, cinemas and social media would moderate behaviour. Locating bus stops closer to junctions that are going to be incredibly busy on roads where traffic volumes are going to increase defies any belief I might have that qualified engineers lifted their heads from theory to even consider lived reality.

Flawed traffic modelling and counts

The traffic counts that form the basis of these plans have not been updated since before the covid pandemic. This week there was an announcement that Ireland has been the country in the EU that embraced remote working the most, this means that traffic counts and needs must have changed. This has not been accommodated within the modelling. On the corollary of that, the expected rise in population hasn't been considered fully, I would venture to add that were it to be properly considered a Metro would be a preferable solution for mass public transportation.

The plans do account for the increase in traffic volumes however the basis of the projection is flawed. The only periods covered in Bus Connects projections of extra traffic are 7am to 10am in the morning and 4pm to 7pm in the afternoon. They have wholly omitted to deal with any other time of day when extra traffic may be more noticeable and will be evident due to the fact that the bus gates are for much longer than would be required and apply seven days a week.

I have had a lot of questions about traffic modelling from areas I represent. They relate on the one hand to areas adjacent to Fortfield Road and on the other hand to areas adjacent to Wellington Lane and Whitehall Road.

No one believes the modelling when it forecasts a reduction of traffic in the section of the Tallaght Road between the M50 and the Spawell. This is the only main exit towards the city from the M50 in the long stretch between the Naas Road and the Dundrum exit. The exits at Ballymount and Knocklyon are really for local traffic and the latter (Knocklyon) partly feeds into the same issues. Even if the projections are right, there is still an awful lot of traffic to be processed through residential roads, if Templeogue Road is closed 6am to 8pm.

My constituents in areas close to Fortfield Road which include all of College, Fortfield, Templeville and Wainsfort estates are worried that all of this traffic will come as far as possible towards the city and will then divert via Fortfield Road and Greenlea Road to access Terenure village. This is clearly the

most direct route to Terenure and beyond if Templeogue Road is closed. They take no reassurance from right turn bans. They feel the signage proposed is inadequate to force traffic to turn off Templeogue Road much earlier.

My constituents in Whitehall Road and Whitehall Road West are worried that when traffic reaches the Spawell, motorists will anticipate that they will not be able to get to Terenure through Templeogue village and will turn left into Wellington Lane and then proceed via Whitehall Road, Whitehall Road West and Rockfield Avenue/Drive towards the city. There is also a fear of "ratrunning" through Dangan Estate. No measures are proposed at all to counteract any of this. They are particularly upset that they are now presented with the Kimmage corridor, and its numerous bus gates which exacerbates the problem.

There is a common fear that the enormous volume of lorries and commercial white vans that use Templeogue Road will be forced into residential areas. Further NTA have failed to note that there are big schools and sporting facilities on Wellington Lane and in Fortfield, thus creating a severe traffic hazard for children.

These constituents were entitled to a full and clear explanation of how traffic would flow if the corridor was implemented. They have not got that. If the bus gate is to operate 6am to 8pm, projections are needed for all of that time and for Saturday and Sunday - there are none provided outside peak.

All of these problems are being caused by the bus gate at Templeogue Road and the simple solution is it should not be allowed. As others will likely have pointed out, there is already a bus priority light there and these are being used extensively in the system.

Elderly and Disability Access

The public transport system has very little equality of access for the people with mobility issues. Every bus has a very limited number of spaces to accommodate wheelchairs; priority for mobility impaired people is reliant upon those very people asserting their rights and relying on bystanders to support them in those assertions. Safer and more reliable means of transport for those will disabilities and the elderly is by taxi or by private adapted car and in some instances special transport is required and provided. All of these need access to the roads that these residents live on. While taxis will be able to use the bus corridor, all other private transport will not. For example a road that will be disproportionately affected by the bus corridors will be Whitehall Road as traffic will likely divert at the Spawell to avoid Cypress Grove Road, its new bus route and the backlog of traffic consequences of the Kimmage corridor, and also to avoid Templeogue Village bus gate, the backlog of traffic implications of the Templeogue Road bus gate and new right hand turn at the Templeogue Road and Templeville Road junction onto Springfield Road. Whitehall Road will consequently have an increased volume of traffic. This road is also due to have two cycle lanes installed. There is a higher percentage of people living with impairments on the road because it has a high number of bungalows. In special transport terms alone, there are five separate and distinctive pick-ups and drop offs of persons with disabilities on that road every day. That does not include those who have their own means of transport but who are obliged to reverse out onto the road because they do not have a sufficient turning circle within their front gardens. These are local issues that have not be considered but are

very real and not particularly likely to change. Bungalows are rare enough so they will always be in demand by persons with disabilities.

Here is a direct quote from an older resident in Springfield citing how they will experience life if the changes planned come into being:

"I try to lead an active social life which involves travelling to various parts of suburban Dublin (Ballyfermot, Donnybrook, Clontarf, Clonskeagh, for examples) not readily accessed by bus from here, and often with a car boot full of various equipment which could not be carried by bus and too frequently to merit the expense of taxis, even if reliably available. I also give lifts to others to or from these events which sometimes finish late in the evening. .... my activities will be severely affected by the new restrictions in the immediate Templeogue/Terenure area not to talk of any further afield. Even accessing shops in Terenure or Rathfarnham Shopping for items too big or heavy to carry either walking or by bus (I would have to walk farther to get the bus to RSC than to walk there directly!) will not be easy and will mean driving considerably longer distances."

The entirety of the bus corridor plans need to be proofed with the rights of persons with disabilities and the elderly in mind.

St Luke's Hospital

St Luke's Hospital describes itself as follows:

> *We are dedicated to being a world class leader in cancer treatment, patient care, research and education. In striving for this excellence, the holistic needs of our patients and their families are our greatest concern.*
>
> ***Since it opened in May 1954, St Luke's Hospital in Rathgar, Dublin, has been caring for cancer patients from all over Ireland.***
>
> *In July, 2005, the then Tánaiste and Minister for Health and Children, Mary Harney, T.D., announced plans to develop a national network for radiation oncology services. As a result, in 2007, the National Cancer Control Programme (NCCP) was established.*
>
> *Under the Health (Miscellaneous Provisions) Act 2010, St. Luke's Hospital became part of the HSE and later part of the St. Luke's Radiation Oncology Network.*
>
> *This network operates from three locations - St. Luke's Hospital, Rathgar, Dublin and St. Luke's Radiation Oncology Units, which opened in March 2011 in St. James's and Beaumont Hospitals.*[4]

St Luke's see patients from all over the country – many currently access it by coming off the M50 at the Spawell through Templeogue Village, Terenure Village, Rathgar Road and Highfield Road. There will be an increased delay accessing Highfield Road because of the bus gate at Terenure Place and the

[4] https://www.stlukesnetwork.ie/secondary-menu/about-us/who-we-are.html

traffic system coming into effect at Rathgar Road/Rathgar Avenue meaning there will be additional traffic on Highfield Road as a result of Rathgar Road becoming a one way street.

St Luke's is also the site for LucDoc, the out of hours GP service for Dublin 6W and Dublin 6 as well as Dublin South Central and Dublin South East. It is currently temporarily relocated to Clonskeagh Hospital Campus but St Luke's is its normal residence. Patients registered with the GP practise in Templeogue for instance have to travel to LucDoc for the out of hours service. This is a 3km distance to go directly from Templeogue Village to Highfield Road in Rathgar. Under the new requirements, the same journey will necessitate a 6km distance along roads now more populated with cars.

Immuno-compromised patients cannot take the bus nor would it be desirable for patients with potentially infectious conditions to take public transport, they are dependent on private cars. Nowhere in the plans is there a reference to the difficulties that with arise accessing St Luke's, therefore I can only conclude that it wasn't a consideration.

Parks, Sports Facilities and Playgrounds

Sports facilities for the young and old are at a premium across the South City area. Every smidgeon of park is booked by several entities and well used by all sports groups/clubs and running clubs. Young children are reliant on lifts from parents to get to the parks and access is needed to successfully accomplish this. While it might be counter intuitive to drive to a park for fresh air and exercise, the fact is that it happens and bus routes are not always direct to the parks utilised by the community. How is access to Bushy Park going to be achieved? Where are car users going to park? Access to this park is going to be very limited or cars are going to park on the already overburdened and congested Fortfield Road as a consequence of the Templeogue Road changes and walk down. In the alternative there is going to a huge round trip along the Dodder View Road onto Rathfarnham Road and into Rathdown that way to be able to park to access the park. Consideration must be given to users during the winter and the fact that it isn't safe for young men and women in general due to antisocial behaviour in the vicinity. And the solution to that isn't gardai, nor should it be left to the Gardai – we really need to give proper consideration to the fact that safety must be paramount.

Heritage

The areas of Springfield and Bushy Park were all originally manor houses that gave their names to the residential roads and park now sitting on what was once their estates. The boundary wall of Bushy Park that is currently under a CPO is the only remaining part of the boundary wall between the Bushy Park House estate and the Terenure House Friary that pre-existed the College. The road was built in 1800. Terenure College which was built on the Carmelite lands in response to the need for Catholic Schools that arose following Catholic Emancipation, the college was established in 1860. A plaque on the original wall commemorates the still existing recess created within the wall structure that was the stone depot for the local authority when building the road between these two estates in 1800, now Templeogue Road. This area with trees on it that have predated its construction is now scheduled to become a cycle lane tracking the worn route on the grass by joggers.

Terenure Village, Templeogue Village, Rathgar Village are all villages with independent histories that should have their character preserved. Yet the CPOs to facilitate this corridor are going to destroy trees that have witnessed centuries of change, the form curtains to the Georgian and Victorian character of the beautiful houses along the route. Before this heritage is destroyed and forever gone there has to be a bar of absolute necessity to reach as in it must be absolutely necessary to make the changes for the greater good. I don't believe that this standard could be achieved while we have had such an unbalanced and little to no discussion on metro as an alternative.

The Chapter 3 document concedes that architectural heritage will be impacted stating:

- ***Archaeological, Architectural and Cultural Heritage*** – *there is the potential for impacts on archaeological, architectural and cultural heritage when providing CBC infrastructure. The assessment had regard to Recorded Monuments and Protected Structures (RMPs), Sites of Archaeological or Cultural Heritage and on buildings listed on the National Inventory of Architectural Heritage adjacent to the corridor;*

So let us be clear ... the senior legislative drafter was removed from other essential legislation to prioritise the Heritage Bill because it was deemed to urgent and serious by the Minister of State overseeing heritage and meanwhile the bus corridor is being built that will obliterate some of our heritage while alternatives are being dismissed.

A Quick Note on Reasonable Alternatives

Chapter 3 of the Documentation entitled "Consideration of Reasonable Alternatives" is supposed to deal with alternatives. One might expect that detailed explanations would be found therein that would give residents the confidence that this is the best way forward and nothing else would be as effective. But this document is nothing of the sort. It has one sentence the length of two lines that dismisses the option of rail based public transport as not having the population to support it.[5] Areas within this corridor and to be served by this corridor have seen a population rise of up to 10.2% (CSO 2021), and more housing is scheduled to be built along and around it.

We are talking about 2040 plans that appear not to be able to conceive population growth. On top of normal nature population growth as evidenced in the recent census, according to government sources over 30,000 Irish people return to Ireland from abroad to live and work every year. We have had over 80,000 Ukrainians come to Ireland in a little over a year and a half, it is estimated a significant number

[5] Chapter 3 Page 5

of them will not return to Ukraine but will make their long term home in Ireland and I certainly hope they do. We are incentivising housing developments in these areas and yet we cannot plan for a population increase!!

The metro alternative at paragraph 3.2.6 merits 201 words over three paragraphs.

I'm sorry but this is not a consideration of any sort of reasonable alternative – an abject failure to consider population growth and metro when citing a reduction of travel times over that same period of 45 seconds is an insult to the people whose lives will be so utterly changed as a consequence of it.

Disproportionate Impact For Very Little Gain

The main roads of Cypress Grove Road, Templeville Road and Fortfield Road with their attendant and surrounding network of residential roads infrastructure will be significantly impacted by the implementation of this Core Bus Corridor especially when viewed in conjunction with the impending Kimmage Core Bus Corridor that will commence at the Kimmage Cross Roads running across Sundrive Road, past Mount Argus (the details of which were only very recently published). It is my contention that the Templeogue Rathfarnham corridor cannot be adjudicated on independently of the Kimmage CBC and without full consideration of the public submissions on that corridor.

The businesses in Terenure and Kimmage/Sundrive as well as the residents in a small triangle of residential roads will be disproportionately impacted by the implementation of the Greenhills/Crumlin, Kimmage and Templeogue CBCs and this must be considered by the planners when making any decisions regarding these three CBCs. Nowhere else in the Bus Connects plans is there such a glut of change impacting on established businesses, urban villages and a small residential area. The proportionality of this impact on the lives of residents and their ability to gain entry to and exit from their homes must be weighed against the supposed benefits of short gains in terms of minutes saved in travel times to the city centre.

The boast of the NTA is increased capacity and reduced journey times. In the past residents have calculated the numbers of actual seats travelling into town on specific routes comparing now with what is planned, and on the 15 route for instance, the number is significantly reduced under the proposed plans. The current published timetable for the 15 indicates fifteen buses leaving the Ballycullen terminus between 07.00 and 07.59. However, this is to be reduced to five when this route becomes the A1. My constituents are at a loss to understand this huge loss of bus service.

The reduced journey times are claimed as a significant reason for the changes however these are minimal, this is a screen shot from the Traffic and Transport Chapter 6 document, page 136:

> **Based on the results presented in Table 6.53, the Proposed Scheme will deliver average inbound journey time savings for A2 service bus passengers of circa 6 minutes in the AM in 2028 and 4 minutes in the AM in 2043.**

This figure arises when you compare "do something" with" do minimum" projections – so ultimately we are talking about a reduction in travelling times of 4 minutes in the long run – SERIOUSLY!!!!! I am advised that this is the second lowest time saving claimed across the 12 bus corridors, and this is on the Rathfarnham to George's Street route. Of even more astounding figures are those of the Spawell to City Centre time saving by 2028 and 2043, cited on page 131 of the same document ... cited as follows:

Based on the results presented in Table 6.51, the Proposed Scheme will deliver average outbound journey time savings for A3 service bus passengers of up to 1.6 minutes (15%) in 2028 (PM) and 0.8 minutes (8%) in 2043 (PM).

Let us be clear ... the calculation is that by 2043 we will save 0.8 of a minute, that's 45 seconds shorter travel time!!!!

By 2043 we could have a very accessible Metro system in place that could cater for increased population and would be significantly more attractive to changed modalities.

These plans are warranted from a cycling infrastructure perspective albeit even that needs to be improved, but from any other perspective there are better ways to achieve the macro objective of changing modalities than this considerable expense for such a limited improvement.

SPECIFICS OF THE ROUTE THAT HAVE NOT BEEN ADDRESSED OR WHERE CONGESTION AND INACCESSIBILITY WILL BE AT IT'S HEIGHT.

1. Villages and Supermarkets: The bus corridor will traverse Templeogue Village, Rathfarnham Village and Terenure Village – but it will also impact traffic going to Kimmage/Sundrive, the village closest to Mount Argus. These all have established businesses and are currently accessible by car, bus and bicycle.
    a. Rathfarnham Shopping Centre – access to this shopping centre will be unchanged under the new proposals, however, traffic volumes because of diverted traffic will be much heavier on all routes to this shopping centre, for example Springfield Avenue will have heavier traffic volumes as a result of the bus gate on Templeogue Road and the right hand turn out of Templeogue Village at the Templeville junction; and Butterfield Avenue as traffic is likely to divert at Templeogue Bridge to avoid Templeogue Road and Cypress Grove Road.
    b. Terenure village via Templeogue Road – under the new proposals a resident of Templeville Road would have to go by bus to go via Templeogue Road and this is not feasible for a full weeks shopping for a family; so instead a resident would have to drive to Wainsfort Road, Fortfield Road, turn right at Kimmage Cross Roads, Terenure Road West and into Terenure Village – a considerably longer way and this is during the hours of 6am to 8pm Monday to Sunday.
    c. Sundrive Road via Kimmage Road Lower. The businesses and supermarket, including access to Mount Argus and Mount Jerome Cemetery will only be accessed directly between 10am and 4pm or after 8pm daily. The businesses in Sundrive believe that this will have a devastating impact on the viability of their businesses.
    d. Nutgrove Shopping Centre – the road to Nutgrove for a resident in Templeville Road or its surrounds runs alongside the Dodder River, it will cross the Templeogue Road corridor and the Rathfarnham corridor but this will have increased traffic volumes due to the impact of diverted traffic, so journey times will be longer.
    e. There are petrol stations in Templeogue Village, on Templeville Road, Fortfield Road and Lower Kimmage Road – there is a likelihood of a fall off in footfall in all but the

Templeville Road petrol station, either because of increased traffic due to diversions in the case of the one at the Fortfield Road junction, and lack of access due to bus gates at the others.

f. Delivery vehicles including HGVs will still need access to businesses in the villages and will now be diverted along alternative routes, their means of access to the businesses within the bus gates is unclear.

g. Terenure Village, Rathfarnham Village, Fortfield Park shops, Kimmage/Sundrive all have a large number of businesses catering for everything from butchers, greengrocers, florists, party supplies, hairdressers, credit union, bank, hardware, library, accountants, solicitors, gyms and many others. These are all businesses that are relied on by the local community and are viable because of the access to them by the local community. Compensation for loss of business needs to be considered as a reality for businesses who will be affected by the loss of footfall and with that the consideration of the loss of jobs.

2. There is a huge disparity even between the road treatments of the two different corridors. Kimmage Road Lower is arguably a narrower road and the bus gate there is limited to peak hours, though inexplicably on a Sunday also, while Templeogue Road is a 6am-8pm seven day a week bus gate rendering the road unusable during shopping times. Bus gates should be consistent in their usage times and limited to peak hours only and at most 6 days per week.
3. The post office for Templeogue Village residents is located at Greenlea Road, a road which under the scheme a car will no longer be able to turn right into from Fortfield Road – so an elderly person going to 10am Mass in St Pius X church on a Friday and then around to the Post Office to collect their pension will have to park on Fortfield Road, cross the now incredibly busier road and go onto Greenlea Road to get to the Post Office. In the alternative they will drive through Wainsfort Green and out onto Fortfield Road to be able to turn left into Greenlea, this will bring traffic through the College and Wainsfort estates that otherwise wouldn't need to be there. The permanent ban on right hand turns are completely unnecessary and don't take account of the local needs such as the Post Office.
4. Increased volumes of traffic will access the junction of Fortfield Road with Wainsfort Road and the small estate called The Orchard. Currently traffic exiting the Orchard are supposed to trigger the lights to all them exit onto the road. This does not always occur. This estate is given no consideration on any of the plans, no consideration of the safety of its access and egress in light of the increased volumes of traffic.
5. Springfield Avenue becoming Dodder View Road is likely to become the main conduit from Templeogue to Terenure and beyond. Dodder View Road has recently undergone extensive works to install a segregated cycle lane. There has been a stream of complaints that the road is frightening to drive because it is now so narrow for cars; numerous local residents have witnessed accidents and near misses where "corners" are too tight or too sharp. This is before there is an increased traffic flow on this road and before an increase in lorries will take place along that road. The engineering of this road does not take account of increased traffic volumes and this must be taken very seriously when viewed by planners in making any decisions.
6. The Rathgar Road plans to turn it into a one way system is draconian and totally unnecessary. This is a wide road, and it comes into narrower two way stretches so it would appear that this road is being used to gain the 45 second advance in travelling times. However, at what cost?

If you live on any of the road off that road and want to get to Terenure you now have a circuitous route all the way around Grosvenor Road if you live sufficiently down towards the Rathmines end of the road, or double back and go via the Harold's Cross Road and Terenure Road North to get there. I cycle the Rathgar Road as well as drive it currently. Save for coming into Rathgar Village at peak times it is a very efficient route home via a car outbound from the city. However, by bicycle while it's a slightly uphill gradient and safe enough, the bus lane will still have to stop at bus stops cutting across the cycle track. There is no safety improvement at a considerable cost of emissions due to longer journeys brought about by the one way system.

7. Terenure Road West merits not attention at all in these plans, neither is there any treatment of it on the Kimmage Scheme CBC. Yet this road is going to take an even greater volume of traffic because it will be a conduit into Terenure by those not able to travel there via Templeogue Road and who are diverting because of the bus gate on Lower Kimmage Road. There are two schools accessed on Terenure Road West Presentation Primary and Secondary Schools, it is already an extremely busy road with significant delays. It is currently the route for the 15A bus. Under the new network plans it will still take two orbital routes, the S4 which will be every 10 minutes during week days and the 74 will be every 30 minutes on week days. The congestion on this road is going to make it a carpark, it is a completely implausible that this road isn't being properly considered within either of the two bus schemes.
8. The schools in the area are all on roads that will now have a significant increase in traffic volumes, child safety does not appear to be a factor anywhere in these plans. Fortfield Park, Fortfield Road, Templeville Road, Terenure Road West, Bushy Park Road all have schools and yet these are the very roads that will have increased traffic volumes.
9. The right turn bans are going to lead to a lot of u-turns in the areas where they apply and these will be done on roads that already have increased traffic volumes which is why the turn bans have been put in place. The peripheral roads will become rat runs as a means to do a "lawful" u turn.
10. It would be remiss of me not to note the concerns of the Parish Priest in Rathmines and many of the parishioners who believe that the traffic restrictions being brought to Rathmines will effectively lead to the closure of the church.

Huge changes in the way we live our lives are necessary if we are to properly play our part in climate change, I completely agree with that. We must bring people with us, however. We must respect their investment into communities, into the shared living spaces of villages, public parks and shopping patterns. We cannot bully through bus routes to effect climate change while causing traffic chaos that will increase air pollution, reduce footfall to businesses and inadequately deal with the need to provide complete cycling infrastructure. We must have consistency in decision making – we cannot rob Peter to pay Paul and this plan appears to do that.

Conclusion

I urge the deciding members to make the many microscopic and the larger changes to this route that will take into account the needs of the local residents. Moderating the scheme would lead to improvements that would be broadly accepted. The public are supportive of improved public transport and cycling. Many cite that changes such as changing the times of the bus gates would be

of great assistance in getting local support and this one change alone would have the effect of supporting less traffic diversions, less rat run trips and significant traffic flows.

I urge you to either send the NTA/Bus Connects back to the drawing board for alternatives and proper environmental impacts, for complete cycling infrastructure and for quality of life or make the detailed changes that are needed to make this viable.

I remind you that you are obliged to give an explanation for your decision making – a broad acceptance without detailed explanations of your reasoning for acceptance or rejection of the entirety or the individual elements of the scheme will not be acceptable – in actual fact the only way to do this justice is to hold an oral hearing.

Oral Hearing

The detail in this scheme is such that each micro decision needs to be viewed on its own merits and either accepted or rejected. The Bord must take into account all of the considerations for every signal decision along the way – some may be good and positive and others so obviously meriting rejection. However, what is left when what is positive remains and the rejected proposals have been removed must be considered with due regard to the effectiveness of the scheme and the benefits of the scheme at a macro level. I do not believe that the information supplied by the NTA is adequate for appropriate and informed decision making. I am aware, by way of example, that there are conflicts in base plans and contradictions across plans supplied for those affected by CPOs. I believe that the only way to appropriately consider each section of the scheme with the level of information that would be required to make an informed lawful decision would be to hold an oral hearing. I believe there should be an oral hearing on this route and I am asking for one to take place.