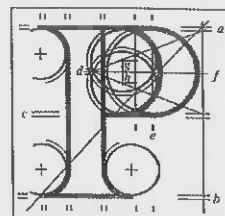


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Michael and Colette Clarke and others
158A Rathgar Road
Dublin 6
D06W9X5

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.

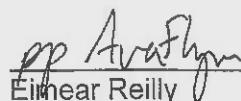
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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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Glaó Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

158A Rathgar Road

Dublin 6

D06 W9X5



AN BORD PLEANÁLA
LDG- 065620-23
ABP- _____
10 AUG 2023
Fee: € 50 Type: CHO
Time: _____ By: REG POST

8th August 2023

An Bord Pleanála (Strategic Infrastructure Division),

64 Marlborough Street,

Dublin 1

D01 V902

Submission re Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

Dear Sir or Madam,

We, the undersigned, understand that the National Transport Authority (NTA) has applied to An Bord Pleanála (ABP) for approval for a proposed road development consisting of the BusConnects Corridor for Templeogue/Rathfarnham to the city centre. This proposed bus corridor would cut through Rathgar and would have very significant negative impacts on the village and the surrounding area, including Rathmines. The claimed gains in terms of the overall speed of buses (to the extent that they can be believed, which is doubtful) are too small to justify the impact on Rathgar and the surrounding area.

There are many problems associated with the BusConnects proposal, of which the main two are (a) that it has been drawn up as a stand-alone concept without regard to the totality of the circumstances in which a bus service must operate and (b) that the proposal is unclear, confused, confusing and, worst, of all, cynical.

To take (a) first, there is a problem at the Rathmines end of Rathgar Road, where we live, with which BusConnects, by itself, cannot deal. Traffic from Rathgar Road, Grosvenor Road and Upper Rathmines Road merges at or near Rathmines Garda Station. Even if BusConnects delivers bus users to the bottom of Rathgar Road from the Rathfarnham/Templeogue end a few minutes earlier than is the case today, the buses will face the same difficulty getting into Rathmines village that they face today. That is the fundamental problem with the proposal. It is impossible to construct a bus service

from anywhere to anywhere else that does not take account of the environment in which it must operate. For BusConnects to work, it must take account of problems such as converging traffic and narrow streets that require solutions other than changing bus numbers and car routes.

As regards (b), the changes to the existing routes are very difficult to follow. As has been pointed out by many people at many meetings, including those we have attended, the technical nature of the online documents has limited the ability of many residents to understand what is being proposed. We can testify to that having failed to make sense of the proposal ourselves. At one public meeting called to discuss the proposal, various residents were heard to say that they did not know how they would get to or from their homes by car. It is, for example, unclear to the undersigned how we will get from our homes to Exit 11 on the M50 and back. The sheer unprofessionalism of the proposal merits its rejection by ABP. Not only is the overall proposal flawed - deliberately so, as we describe below - but it leaves residents and streets in "mid-air", unsure whether they are coming or going.

We support the improvement of public transport and indeed cycling (where safe) and, given our location, we are able to walk to the city centre and back, something that we do regularly (although, like others, we are increasingly conscious that the streets are not as safe as they were or should be). We welcome the improvement in public transport in recent years, including cross city buses, and our access to the DART and other train services at Pearse Station (Westland Row) from Rathgar Road via the 15A and 15B. We all use public transport more than we did in the past.¹ In that regard, not the least part of our disappointment with the BusConnects proposal is that it offers no improvement on our existing bus service, which is excellent.

We do not understand the proposed removal of a number of bus stops on Rathgar Road. As pointed out above, the current bus service through Rathgar Road is excellent. There is no need to change it unless it can be improved and the removal of the bus stops certainly does not do that.

We are very aware of the cynical nature of the proposal, which, in reality, is not about public transport at all but about making travel by car more difficult. To reach the M50, we will have to travel towards Rathmines, turn left at the intersection of Rathgar Road and Grosvenor Road and head towards the M50 that way or turn right at the junction of Rathgar Road and Upper Rathmines Road², travel up the latter road and turn right again at the junction of Upper Rathmines Road and Highfield Road. (Not very climate change friendly.) We are not sure how we will get from Grosvenor Road or Highfield Road to the M50 and back again. We have considerable sympathy with our neighbours on Highfield Road, who are going to experience a great deal of unnecessary additional traffic because of the decision to make Rathgar Road one way for cars³, a decision that only makes sense as part of a plan to make travelling into the city centre by car as difficult as possible. Rathgar Road is wide and can accommodate, as it does today, public and private transport using the road in both directions. The existing bus lanes can accommodate cyclists, as is the case throughout the city.

¹ One of us is retired and has free travel but even without it he would use public transport more than he did in the past as it is possible to get to more places in the city quickly by public transport today than it was in the past.

² Currently only permitted at certain times of the day.

³ We assume taxis would continue to have two-way access to Rathgar Road but we are unsure about commercial vehicles, including bin trucks.

As we have already stated, we favour using public transport or walking as much as possible, and we do both, but private cars remain an essential part of the lives of most people, including the undersigned. Using the BusConnects project to prevent people from getting round by car, as they must from time to time, is deeply cynical, as demonstrated by the proposal to reroute car traffic from Rathmines to Ranelagh via Castlewood Avenue and Charleston Road, which is completely unworkable, as must be clear to BusConnects. The same applies to Lower Rathmines Road where the outcome, if the proposal is approved, would be chaotic, in particular for residents and businesses there and indeed for people trying to reach schools and the church. There are three primary schools, including a new Educate Together primary school going into the old DIT building on Rathmines Road, and two secondary schools on Rathmines Road⁴ as well as several crèches just off Rathmines Road. There is a significant drop in car traffic during the school holidays. The idea that all parents can drop their children off by bus, therefore, is not realistic⁵.

Any proposal to reconfigure public transport on Templeogue/Rathfarnham to the city centre corridor must take account of the lack of rapid rail and/or tram facilities in this part of the city. They are an essential part of the public transport system of any city of Dublin's size or larger, including this part of Dublin. The proposal to extend BusConnects to this area should be postponed until tram and/or rapid rail travel has been extended to this area.

Dublin is arguably unique (or certainly unusual) among cities of its size or larger in that there is a reluctance – possibly on class grounds – to use public transport. It is a quirk of the city's culture that can, we believe, be addressed by making public transport free or virtually free (no more than €1 for every journey, long or short), in which case free public transport for senior citizens would no longer be required. There would be a cost to the Exchequer (in subventing the transport companies and in the loss of tax revenue from lower sales of fuel) but the health and environmental benefits would compensate for that as would the ending of the free travel scheme for senior citizens and the economic benefits of a better functioning city.

The standard response to calls for free or virtually free public transport, possibly inspired by the Departments of Finance, Public Expenditure or Transport, and often repeated by the media and others, that free public transport would result in citizens jumping on and off buses for fun is both insulting to senior citizens and asinine. Senior citizens have more to do (in what are frequently nowadays busy retirements) than jump on and off public transport. They use public transport when they have somewhere to go for which adequate public transport is available, they walk when they can and they drive when they have to.

The BusConnects proposal for our corridor is cynical, unworkable and unacceptable to those who would be affected by it. It should be rejected. Any proposal for this area should respect existing traffic patterns, which take account of the lives, lifestyles and livelihoods of the people of this area, and its institutions, including schools and churches, the existing road structure and the current excellent bus service. The narrow streets, in certain locations, and indeed the even smaller streets off the main thoroughfares in some parts of our area, are not amenable to a crudely designed

⁴ There might in fact be more schools in Rathmines.

⁵ While we support the objective of children going to school on foot, by bicycle (where safe) or by bus, which should be national policy and hopefully will be one day, footnotes 4 and 5 demonstrate both the unprofessionalism and the cynicism of the proposal.

proposal, which, in any event, is designed to prevent people driving rather than to encourage them to take public transport. This area needs trams and/or rapid rail before BusConnects is extended to it. Finally, the NTA should distribute any approved proposal to those who would be affected by it in advance of its coming into force and it should be capable of being understood by everyone.

Yours sincerely,



Michael & Colette Clarke



Mark Grehan and Katrin Neue (also Rathgar Road)

Lui O'Brien (also Rathgar Road)

