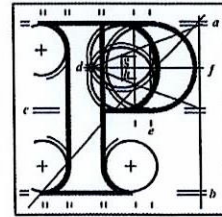


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Neasa McGarrigle & Oisín Tobin
28 Greenmount Road
Dublin 6
D06A274

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.

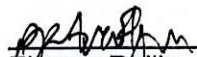
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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 Pleanála in respect of the Templeogue/Rathfarnham to City Centre Core Bus Corridor (the “**Proposal**”)

Neasa McGarrigle & Oisín Tobin, 28 Greenmount Road, D06A274

We write as residents of the area which will be directly and adversely impacted by the Proposal.

The Proposal suffers from a number of material flaws and should not be approved. The Proposal will cause material and irreparable loss of amenity to a large impacted area for, at best, marginal and unproven benefit. Improvements to public transport can be implemented in more straightforward ways which will contribute to, rather than harm, the neighbourhoods in this region.

The following points should be noted:

- **The Proposal will provide limited upside.** From the materials published, it is difficult to assess what transport benefit will actually accrue from the Proposal. From materials available, it appears the Proposal may lead, at best, to a four minute saving in travel times to the City Centre. Such a benefit, which is at best speculative and marginal, is entirely disproportionate when compared to the costs and harms which the Proposal will inevitably inflict, including irreversible environmental destruction, inconvenience to many thousands of residents and impact to and potential loss of businesses in the villages along the route.
- **The Proposal is based on an inaccurate understanding of the transport needs of citizens.** The Proposal is designed to improve linear journey times from suburbs to the City Centre (i.e. Dublin 1 and Dublin 2). This is predicated on an entirely unrealistic and simplified model which assumes that citizens live in the suburbs and commute into “Town” to shop and work. This model ignores the fact that Dublin is a city with multiple hubs and that individuals’ primary transport needs often relate to travel around the city outside of the canals, often within their local area. The Proposal fails to properly engage with how local residents travel around their area and why they use their cars instead of buses. We have set out in the annex examples of the sorts of journeys which we often make which we would regard as relatively typical for residents of our area. The Proposal will not assist with, and will indeed complicate, travel of this sort. In short, the Proposal optimises for one type of journey (that from the suburbs to town) at the expense of all others. The fact that the adjoining bus corridor plans are not available at the same time makes it impossible to fully understand the scope of the issues caused by numerous changes that will be made to traffic flows across the area. However, based on the information available to date, it appears very likely that non-bus journey times will be increased and there is likely to be a significant increase in traffic on residential side streets, with the resulting risks to the safety of children and other residents.

- **The Proposal is based on flawed data.**
 - The data is based on pre-pandemic information and fails to account for the entirely different way many people work now. Working from home has fundamentally altered traffic flows and a Proposal which fails to engage with the position as it now is, not how it was pre-pandemic, lacks any credible factual basis and should be rejected on this basis alone. In particular the bus and car traffic flow has changed considerably on different days of the week as more flexible office days have been introduced.
 - In a public zoom during the pandemic when asked about whether the data would be re-examined in light of post-pandemic changes in lifestyle the reply was that it would not be but the number of buses would be cut if not needed — This is wholly unacceptable.

- **The Proposal fails to make buses an attractive mode of transport.** People do not need 4 minutes off their journey, they need to know that when they arrive at a bus stop there will be a bus coming in less than 10 minutes (and ideally 5-6 minutes). The Proposal does not increase the number of buses sufficiently. We have been unable to locate any material in the voluminous documentation submitted with the Proposal which actually demonstrates that people would choose to use the bus over cars for the paltry saving of 4 minutes in bus journey time to City Centre. In addition, the Proposal appears to assume that people will be willing to switch buses 2 or 3 times which is highly unlikely to happen given the Irish weather and the long delays between buses. Knowing that we can walk out the front door and have a nearby bus stop within a 5 minute walk and the ability to get a bus within 5-6 minutes of reaching the bus stop would make us confident in the bus system and make us use it as default transport where we do not have the time to walk. We have been able to do this in other cities such as New York, London, and Berlin and it makes a difference. This issue could be fixed without the bus corridor which does not propose to increase buses to the extent needed.
 - Rather than embracing a large scale and destructive Proposal, it would be much more sensible to do a proof of concept beta trial where there are an increased number of buses running on each route so the wait times for buses is reduced in order to see if people would be likely to take buses more often and have the confidence to switch buses knowing that they won't have to wait more than 5 minutes at the 2nd or 3rd bus stop.

- **The Proposal fails to adequately address its adverse impact on sustainability and CO2 emissions.** The plan does not take a holistic view of sustainability but considers buses and bikes in a silo. In particular, it fails to adequately consider the positive effect that building up village amenities has on reducing the amount people travel outside their area as well as their satisfaction and involvement in their community. Instead the Proposal only serves to hurt our villages to serve traffic. Similarly, the Proposal ignores the fact that, by design, it will force traffic off major arterial roads into side streets (the closure of Rathmines Road to push traffic up the small Castlewood Avenue, which is already at capacity, is a stark example of this) and make it more difficult for individuals to travel around the city by car, thus likely increasing the length of unavoidable car journeys. Simply put, there is a material risk

that the Proposal will gridlock many residential roads, increasing noise and air pollution.

- **The Proposal fails to explain why other, more proportionate, solutions are insufficient.** We have been unable to identify any data or studies explaining why the Proposal would be superior to alternatives such as:
 - introducing congestion charges in the city centre such as that successfully introduced in London 20 years ago.
 - Increasing the number of buses running on each route (convenience of frequency over total journey time).
 - Introduction of park and rides which work very successfully in other places (Oxford for example)
 - Ensuring the existing bus lanes operate efficiently.
 - The Proposal envisages closing Rathgar Road, one of the main arterial routes into the City Centre to bi-directional traffic. Rathgar Road already has a bus lane. However, in our experience it is frequently blocked by dozens of cars and trucks at rush hour. This leads to buses swerving in and out of the bus lane, causing delay and giving rise to safety concerns. A simple solution to speed up journey times, which could be implemented very quickly, would be to aggressively police the bus lane to ensure it operates as a clear way. It is remarkable that the Proposal seeks to fundamentally reshape Rathgar Road when such a straightforward approach could achieve similar results at little to no cost.

- **The Proposal will reduce the accessibility of bus services for individuals who live along the route.** The time savings envisaged by the proposal appear to be generated, at least in part, by the removal of multiple bus stops. This gives rise to multiple issues. First, it is irrational to justify a transport scheme based on marginal time savings which are generated by increasing the time it takes for one to actually access the mode of transport. This simply means that individuals will spend more time trying to get to a bus and less time on one. Second, and more fundamentally, the Proposal inconveniences elderly people and people with less mobility. In general having to walk further to the bus stop, especially in Irish winters or rainy days throughout the year, does not entice people to use the bus over cars. Many of the residents of our road and surrounding roads are over the age of 65 and the removal of stops will make it harder for our neighbours. To give two non-exhaustive examples:
 - Example 1: Removal of 2 bus stops on Rathfarnham Road between Rathdown Park and Terenure Crossroads means there is considerable distance between the 2 number 16 bus stops in Terenure which will be a serious reduction in convenience and accessibility. It also means that children getting the bus with their parents to the primary school or creche at the War Memorial Hall have an additional road (Rathdown Park) to cross at busy traffic times. There would probably be a need to hire additional school traffic wardens at Rathdown Park as they currently stand at the school back entrance beside Lidl because there is no cross road at that point beside the current bus stop.

- Example 2: The proposed A Spine bus route appears to remove services to Bushy Park Road which is a major inconvenience, especially to the multitudes of elderly people who live there and people of more limited mobility. As a pregnant woman, I know from experience that having to walk a few extra minutes to get somewhere is incredibly draining and difficult. My condition is temporary, but for those who have to live this way permanently, removing bus routes and stops is detrimental for accessibility and the ability to maintain independence. Our neighbourhood has a significant population over the age of 65 and this will have a significant negative impact.

- **The Proposal will cause irreparable harm to the environment and amenity of the area, including through the destruction of historic features and trees that are either irreplaceable or which will take decades to replace.** The proposed plan states sustainability as a key factor but the tree removal and removal of part of Bushy Park is a significant detriment to the environment. A 4 minute journey time reduction does not warrant the environmental destruction. These trees provide a rich character and pleasant atmosphere to walk in the impacted areas and immense enjoyment to the local residents. We enjoy walking from Terenure to Rathmines because the trees are a beautiful backdrop throughout all seasons. They provide sunshade and rain cover along the footpaths. Removing these and increasing the lanes of traffic (be it bus or cars) greatly reduces that enjoyment of walking which is supposed to be the number one transportation encouraged for sustainability. A number of trees on the Terenure Road East alone marked to be removed are very mature and appear to predate the houses of whose gardens they are in which are marked for compulsory purchase. It takes decades for any new trees planted to reach the carbon dioxide absorption levels of these 100+ year old mature trees. These trees help absorb the car and bus fumes. These houses maintain the trees beautifully and even hang Halloween and Christmas decorations off them for a further charming experience that adds character and enjoyment to neighbourhood walks. Furthermore the gates of the houses on Terenure Road East that are listed for compulsory purchase are very old and very aesthetically pleasing. Even if you were able to replace them with exact like for like (questionable given their age), the carbon emissions of the new concrete required would make an impact on the objective to improve sustainability in Dublin. Likewise the concrete and tarmac required to carry out the scheme would make a dent in any carbon savings. A congestion charge might be far more effective to reduce carbon emissions. Simply put, in our neighbourhood the scheme will replace mature and well tended nature and period features (many of which are subject to Z2 conservation zoning) with tarmac.

- **The Proposal will damage Terenure and Rathgar Villages.** The proposed plan does nothing to improve the cohesiveness of the Terenure Village community and is likely to deteriorate it considerably due to increased traffic and increased difficulty for people in the surrounding areas driving to the village to do their weekly shop in Lidl or Aldi due to the introduced restrictions on turns and other restrictions. There was also no consideration built into the plan made to improve the suboptimal pedestrian situation in Terenure Village. Due to the lack of pedestrian lights from Vaughan's pub to the Lott's side of the road at the crossroads or from Lott's to Bank of Ireland, many pedestrians either make risky crossings which would be made even more dangerous

by the proposed corridor, or choose to favour one side of the village over the other. This leaves a segregated feel and discourages community wholeness and initiatives. It impacts clientele to restaurants and local businesses that should be fostered. Good sustainability planning should always encourage local businesses to foster hyper local shopping and reduce journeys and journey times. The proposed plan shows only a tunnel focus on buses and cycling into town and omits other very important factors that can help alleviate climate change.

Likewise, the proposed plan looks like it would damage the good community cohesiveness that exists in Rathgar Village due to the congestion that is inevitably going to occur on Highfield Road. There is insufficient modelling of the impact of the Proposal on Highfield Road and Rathmines Road Upper which are not equipped to deal with the volume of increased traffic coming from Rathmines which the Proposal will send their way by closing Rathgar Road to outbound traffic.

- **The Proposal will make it more difficult for us to leave our street and increase journey times** The right turn ban from Greenmount Road to Terenure Road East is adding another inconvenience to a road that is already subject to a significant number of traffic restrictions which are confusing to many visitors and delivery drivers to our house. This additional restriction is likely to simply extend the length of any journeys which we need to make by car.

Annex: Examples of car journeys that this bus corridor doesn't solve for:

1. Journey: From Greenmount Road to Grand Canal Dock

- Regularity of journey: Daily Mon-Fri
- The removal of the bus route that previously went all the way to the bus depot in Grand Canal Dock is the primary reason one of our household cannot use the bus to get to and from work. This bus now stops passenger drop offs a good 15-20 minute walk from the depot at the far end of Pearse street even though presumably the bus still needs to go to the depot. Having previously lived in the grand canal area I know that the walk down Pearse Street to the new nearest bus is not particularly safe as a woman walking after dark. This deprives some of the largest global businesses (Google, law firms, Airbnb, major financial businesses) with offices in the grand canal area of the city centre from a bus route to the D6 area. Due to the demands of working in these companies, finishing work often well after 9pm is common. Without the bus that previously went from this area, a taxi or private car is the primary means of getting home from a very long day where a regular reliable nearby bus would be more convenient and cheaper.
- The bus corridor offers no solution to this problem.
- Suggested solution: Reinstating previous full bus route. Increasing number of buses on route to reduce wait time for bus. Increasing number of buses on route to reduce wait time for bus so that it is a viable option.

2. Journey: Greenmount Road to Grangebrook estate.

- Regularity of journey: Weekly
- There is only the 15D which runs once in the morning at 8:05 from Whitechurch and at 15:00 and 16:45 from Merrion Square connecting these two locations. The other options have a 15 and 23 minute walk to the bus stops with a large hill that is not feasible for older individuals. The viability of public transport to this area has been decimated by cuts to service over the past 20 years.
- The bus corridor offers no solution to this problem.
- Suggested solution: Reinstating previous full bus route. Increasing number of buses on route to reduce wait time for bus so that it is a viable option.

3. Journey to Whitehall Road West.

- Regularity: fortnightly
- We visit family who live on Whitehall Road West. Currently the 17 bus is wholly unreliable and often has long wait times between buses that are longer than the amount of time it would take to drive it. The 15a route leaves me 12 minutes away from the destination which again is a longer walk than the drive over. I don't tend to take this journey in rush hour so the wait times for buses are much longer. Without knowing how the planned Kimmage bus corridor will impact this journey it is difficult to say how much more difficult the car journey is set to become but I imagine it will not be unscathed.
- The bus corridor offers no solution to this problem.

- Suggested solution: Increasing number of buses and reliability of routes to reduce wait time for bus so that it is a viable option.

4. Journey from Greenmount Road to George's Street Dun Laoghaire

- Regularity: At least once a week for work.
- One of our household works in Dun Laoghaire. The fastest way to get there by public transport at rush hour is the 65/65B that stops behind Tara street dart station and then the dart to Dun Laoghaire clocking in at around 50 minutes. However, the bus only goes once every 40 minutes at peak morning rush hour when they have to leave. It means they have to be at the bus stop at 7:15 and get into work 45 minutes early (this does not mean they can leave 45 mins early). If they drive they can get there in 25-45 minutes and get up a lot later and arrive just in time for work. The alternative of getting the 15 bus routes into the dart adds 20 minutes and pushes the journey time to over an hour so while potentially viable it is a less attractive option to the car. Note: that the other new location for my office that I will likely have to travel to in future is in Northern Cross. Without seeing the adjoining bus corridor routes I have no idea how this car journey would be impacted.
- The bus corridor offers no solution to this problem.
- Suggested solution: Increasing the number of buses to reduce wait time for bus so that it is a viable option. Putting proper cross-city routes in place.

5. Journey from Greenmount road to Dunnes in the Swan centre, Greenmount road to Tesco/homebase/Harvey Normans Ashgrove shopping centre, Greenmount road to Woodies in Tallaght. (Note: none of these are in the city centre)

- Regularity: at least once a month
- We occasionally need to make car journeys to places where the load is too heavy or big to carry on a bus. Some of the redirects and no right turns or one ways mean that these journeys would actually be extended in length using more power/petrol than they currently do.
- The bus corridor offers no solution to this problem
- Suggested solution: Don't introduce the bus corridor as the restrictions in this make it so much more difficult to get around for journeys where it is impossible to carry everything by hand.