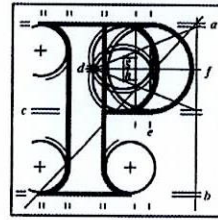


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Pete & Emma Smyth
19 Highfield Road
Rathgar
Dublin 6
D06DX06

Date: 18 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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Glaio 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

From:

Pete & Emma Smyth
19 Highfield Road
Rathgar
Dublin 6
D06DX06

To Bord Pleanala Ref 316272.

I am a resident in 19 Highfield Road Rathgar, Dublin 6 and am writing to make observations objecting to the above reference 316272. and also specifically with regard to the changes to Rathgar Road and the effects that will have on Highfield Road and surrounding roads.

Observations and Objections to the overall plan

With regard to the overall plan I have a number of observations with regard to the disruption and amount of Public monies being spent:

1. Out of date Survey:

Living in a Post COVID world: All the studies on volumes that were made and the subsequent plans were based on surveys in 2019.

- Since then the world has change and specifically the increase in working from home and when and how people will travel to work.
- Move to eScooters, eBikes, bike: Since 2019 the volume of sales of increased massively. In Senator John McGahon online statement 19th August 2022 he notes that 'The Confederation of the European Bicycle Industry estimates that sales of e-bikes in Europe topped five million for the first time last year and it predicts double digit growth every year until 2030. Businesses need to embrace this major transformation in transport.

It is reasonable to assume that since 2019 the volumes of eBike has increased and to such an extent along with COVID work practices that the survey taken is no longer viable. Further that not sufficient plans have been taken into the treatment of eBike commuters.

With the disruption and cost of this plan the NTA should be re surveying the traffic, make amendments to plan with increased focus on ebike/bicycles and publishing the results:

[Request that Bord Pleanala reject plan requesting updated traffic survey and focus on ebikes.](#)

2. No apparent consideration of other Options:

The plan has massive disruption and doesn't build sufficient reflection of either tram systems or a Metro underground that should completely remove massive number of traffic. NTA should be required to cost the options for each of these and that they should be alternatives.

[Request that Bord Pleanala reject plan requesting that underground and tram systems by evaluated](#)

3. Lack of number of bus's on the routes in general:

Currently under NTA, TFI and the Bus companies there are very few bus's on any route and times are infrequent. As an example:

Depending on what bit of the corridor you are dealing with between Templeogue village and Portobello, the bus services in the morning peak are the same or worse. This is largely because the number 15 service has 15 buses scheduled to leave the Ballycullen terminus between 7 and 8am and for the rest of the working day it is running every 5 to 12 minutes. The replacement 15 (A1) will only have 5 services an hour. The huge loss of frequency between 15 and A1 is generally not made up by other services

The most obvious decline is on Templeogue Road down from 19 to 10 in the morning peak, but I think Rathgar Road at a proposed 24 (the 14 and 15B will be lost) will be slightly down. And two of the A services will be taking all the traffic from the Dundrum direction.

This reduction in services may in fact be linked to lack of demand due to COVID supporting the first point above

Request that Bord Pleanala reject plan requesting the NTA TFI etc should significantly increase the volume of bus's on the various route and not represent a plan until this is done.

4. Little effect on Time saved

Based on research of the documents provided there appears to be very little time saving for Bus's following the implementation of the plan. As such that it is not reasonable either for the value of Public monies and for the disruption to residents that the project is no worth commencing;

For example:

In traffic and transport section 6 at pages 136 and 142 respectively it is claimed there will be a time saving of 6 minutes inbound on average and 8.2 minutes outbound on average. This saving reduces over time.

They also do not break down what they save by having Rathgar Road one way inbound. It would be estimated that most of the time saving is between the Swan Centre and George's St, as this is where the bus currently gets delayed and the alternating one way system inside the canal should speed up the buses.

Request that Bord Pleanala reject plan requesting the NTA review the amount of time saved along the route and base on the low level stop the plan and invest in other options; Metro; Luas extension .

5. Damaging to village life throughout the route

The plan takes very little consideration of the importance of retaining and growing the concept of having thriving and lived in village in town. With the vast shortage of housing it is critical that we ensure that village and suburbs in Dublin are encouraged to be place to live. The plan as presented

only looks at how to get traffic into and doesn't have objectives about how to improve the quality of living along the routes.

Making effective 'highways' with bus lanes, cycle lanes and car lanes will have the effect of cutting villages and suburban areas in two.

24 Hr restrictions on one way, bus gates , quiet rads etc ONLY effect residents of surrounding areas outside of peak traffic hours. These plans show no regard to residents living along the planned routes. Having these change will make it significantly more difficult to maintain and increase the quality of living in town.

Request that Bord Pleanala reject plan requesting the NTA develop a plan that doesn't negatively effect village life eg: One-way Rathgar Road only during peak hours; similarly access to quiet roads only restricted during peak hours, access to quiet roads review the amount of time saved along the route and base on the low level stop the plan and invest in other options; Metro; Luas extension

The traffic survey conducted in November 2019 on Rathgar Road showed that between 7692 and 9925 vehicles travelled outbound on Rathgar Road. This traffic to the extent that it does not disappear will need to find a new route. The route "prescribed" by the authors of BusConnects is Upper Rathmines Road and Highfield Road, with the new right turn. No doubt a fair bit of this traffic will use Villiers and the adjacent roads. The survey is survey 12-5 on Rathgar Road close to Garville Ave with direction B being outbound. The surveys are in Traffic Counts on the BusConnects website.

Specific Observations and Objections regarding effect on Highfield Road and surrounding roads as a result of one way system on Rathgar Road.

1. Increased Traffic on Highfield Road

My observations below are based on the not unreasonable assumption that as the alternative to using the Rathgar Road going from Rathmines and associated roads out towards Rathgar and beyond that existing traffic will use Rathmines Road Upper and Highfield Road as the "preferred" new route. In addition to reasonable assumption that it is the straight route 'as the crow flies' but more directly this can be inferred from the fact that your plans showing that (as per map 28) you are putting in a new permitted right turn into Highfield Road. Further at the junction of Rathgar Road and Highfield Road, there will be a new set of traffic lights to allow traffic exit Highfield Road (see page 31 of Chapter 4 in EIA). There would be no reason to take these measures were it not intended that this be the "new" route.

As an obvious back up to these clear alternatives there has not been any mention of what Sat Nav says as this is what Lorry drivers will use. Currently it shows as equal using Grosvenor Road BUT for Lorries with the Roundabout on the Grosvenor Road AND the planned right turn planned for Highfield road it will show Rathmines Road Upper and Highfield as the suggested route. It is further highly likely that a lot of drivers will rat run through Villiers, Templemore and Neville Roads and then try turn right onto Highfield. This is probably quite dangerous and is contrary to public safety.

THE bus gate is due to operate all day and there is no justification for this, even if the plan for Rathgar Road goes ahead there is a clear case to be made that Rathgar Road outbound be a long bus gate say 4pm to 7pm only weekdays. At least that would confine the extra traffic to the evening peak. This is an option that NTA should be required to consider.

Specific points

- The traffic survey conducted in November 2019 on Rathgar Road showed that between 7692 and 9925 vehicles travelled outbound on Rathgar Road. This traffic to the extent that it does not disappear will need to find a new route. The route "prescribed" by the authors of BusConnects is Upper Rathmines Road and Highfield Road, with the new right turn. No doubt a fair bit of this traffic will use Villiers and the adjacent roads. The survey is survey 'Corridor 12'-5 on Rathgar Road close to Garville Ave with direction B being outbound.
- Further the Survey shows that from B to C Highfield Road to Rathgar the current volumes were recorded at 2746. Combining this with the up to 10,000 cars lead to, by any reasonable estimation, between 7,500 and 10,000 e.g., 3 to 4 times the current volumes of cars Lorries coming up Highfield Road.
- Even though traffic can go down Rathgar Road due to the Bus Gate there is likely to be increased traffic going down Highfield to avoid such Bus Gates. From same traffic survey it shows currently 8278 going down Rathgar Road and 4284 going down Highfield, again any estimations would be that volumes will significantly increase.

- The volumes planned for Highfield Road will now be great than currently on Rathgar Road which is significantly wider and more suitable than Highfield Road.
- The proposed removal of the slip road which was put in place for SuperValu is unworkable as they need to get deliveries and potentially will put the shop at risk if cost of delivering with smaller vans is required. COVID has shown how important local grocery shops are and removal of this slip road is not reasonable. Further as its' unworkable it is likely that the Lorries will in fact part on the road to do their deliveries causing disruption where currently there is none.

The effect of such increased volumes will have a significantly effect on residents of Highfield and surround 'Rat Run' roads that is more significant in consider opinion than any other road on the route. Nowhere will the volumes potentially increase by up to 4 times current with the consequent effect on daily life, entering and leaving driveways, walking, cycling up and down the road, receiving deliveries.

I do not believe that the NTA and Bus Connects have properly considered these volumes and have erred in their calculations. Unbelievably in the Survey and reports the following chart is included that implies that traffic on Highfield Road will fall in the AM peak (similarly effect on Upper Rathmines Road. In my opinion the traffic survey data has not been analysed corrected.

Impact on Indirect Study Area (AM Peak Hour)

Indirect Reductions in General Traffic: In addition to the general traffic flow reductions occurring along the direct study area, there are key reductions in general traffic noted along certain road links within the indirect study area during the AM Peak Hour. The key reductions in traffic flows along the indirect study area during the AM Peak Hour are outlined in Table 6.62.

Table 6.62: Road Links that Experience a Reduction of ≥ 100 Combined Flows during AM Peak Hour (Indirect Study Area)

Location	Map ID	Road Name	Do Minimum Flow (pcu)	Do Something Flow (pcu)	Flow Difference (pcu)
Eastern Side of Proposed Scheme	S.2	Firhouse Road	1,016	902	-114
		Old Bridge Road	1,356	1,008	-348
		Templeogue Road	1,128	498	-630
	S.3	Ballyboden Road	941	807	-134
		Butterfield Avenue	970	808	-163
		Nutgrove Avenue	1,148	871	-277
		Nutgrove Way	1,109	1,006	-103
	S.4	Braemor Road	597	497	-101
		Highfield Road	619	499	-119
		Orwell Road	1,148	1,013	-135
		Rathmines Road Upper	697	524	-172

[Request that Bord Pleanala reject plan requesting the NTA review the effect on Highfield Road and amend the plan, accordingly, potentially reverting to the Rathgar one way system.](#)

2. Environmental effects on Highfield Road

Based on bullet point below we request that Bord Pleanala reject plan requesting the NTA carry out the full range of environmental effects on Highfield Road, using the significantly increased volumes (as opposed to their estimate of decrease) in their calculations: Survey to Include and be published to the public the following:

- A. Effect on trees on Highfield Road
- B. Effect on Wildlife on Highfield Road
- C. Noise study
- D. Air Quality.

- **Effect on Trees and Wildlife on Highfield Road**

There are a lot of trees on Highfield Road many hanging over the Road where Bus's Lorries will pass and there is likely to be a significant effect on these (I attach below pictures to highlight this). The effect on the trees and any related wildlife has not been assessed and this should have been done.

In 2020 the builder of 37A Highfield Road removed trees against the planning regulations and with the support of Planning Enforcement and Dublin County Council these trees were saved. Now there is significant concern that these trees will again be under threat of being removed as a consequence of Lorries and Bus's being direct up Highfield Road.

Trees overhanging proposed Bus stop at Fairfield Park



Tree Previously saved following Planning violation at 37a Highfield Road



Sample of substantial Tree at risk on Highfield Road at threat from Bus's and Lorries and pollution.



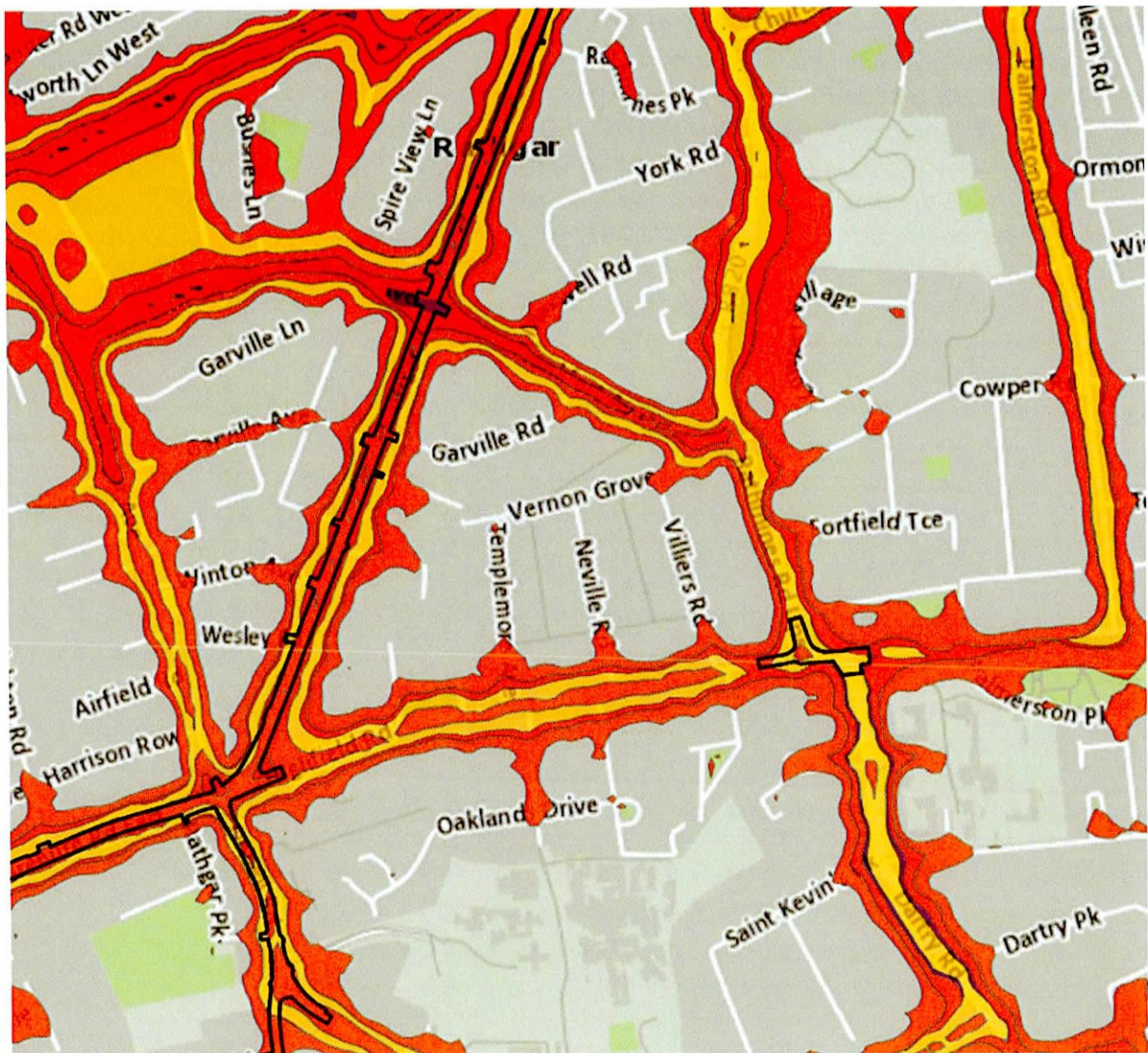
[Request that Bord Pleanala reject plan requesting the NTA complete a full environment review the effect on Highfield Road and amend the plan, accordingly, potentially reverting to the Rathgar one way system.](#)

- **Environmental Impact Air Quality**

Only cover the main route not the roads that will be significantly affected by the route. Highfield with est. of 10,000 cars lorries will have a significant negative effect. We an Environment assessment of Highfield Road and modelling of what the effect will be with the increase Cars Lorries across all the sections highlighted in the document.

- **Current NOISE**

Current survey only looks at the current noise levels and doesn't cover the obvious effect of the Est 10,000 car, Lorries now travelling up Highfield Road. Chart below should be combined to show the effect on Highfield Road.



3. Decision to change original plan on Rathgar Road, unfair decision – Aarhus Convention.

Based on the points below we request that in line with the intent and principles of the Aarhus Convention that Bord Pleanala reject plan requesting the NTA reopen the plan to reconsider together which option is the best and not allow the NTA selectively agree options with each effected Road.

NTA and Bus Connects published plans for Rathgar Road that involved CPO, removal of trees and installing car, bus and cycle routes and sought observations. Following receiving objections from the Rathgar residents the Plan was changed making it a one-way system. I have a number of objections to this decision:

- No effort was made to seek input from residents on Upper Rathmines Road and Highfield which is the route "prescribed" by the authors of BusConnects is Upper Rathmines Road and Highfield Road, with the new right turn.
- Residents would have reviewed the original plans and might have had no objections, it is not reasonable to selectively address one part of the route without making subsequent fallout without making sufficient efforts to those affected. Making Rathgar a one-way is a massive change and Highfield ND Upper Rathmines Road residents should have been consulted. Contrasting this with the full engagement with the residents of Rathgar Road (option 1 for outbound traffic) and the zero engagement with Highfield/Upper Rathmines Road (option 2). I would suggest that with a balanced consultation that option 1 in fact is much better, but that in any event the two options need to be fully assessed by the Bórd before coming to a decision.
- The Aarhus Convention (<https://www.citizensinformation.ie/en/environment/environment-and-the-law/aarhus-convention/>) was ratified by Ireland covers major public projects is understood to require that ALL elements of the project must be considered as one and that one cannot selectively address individual parts of a scheme until the whole scheme is addressed as one.

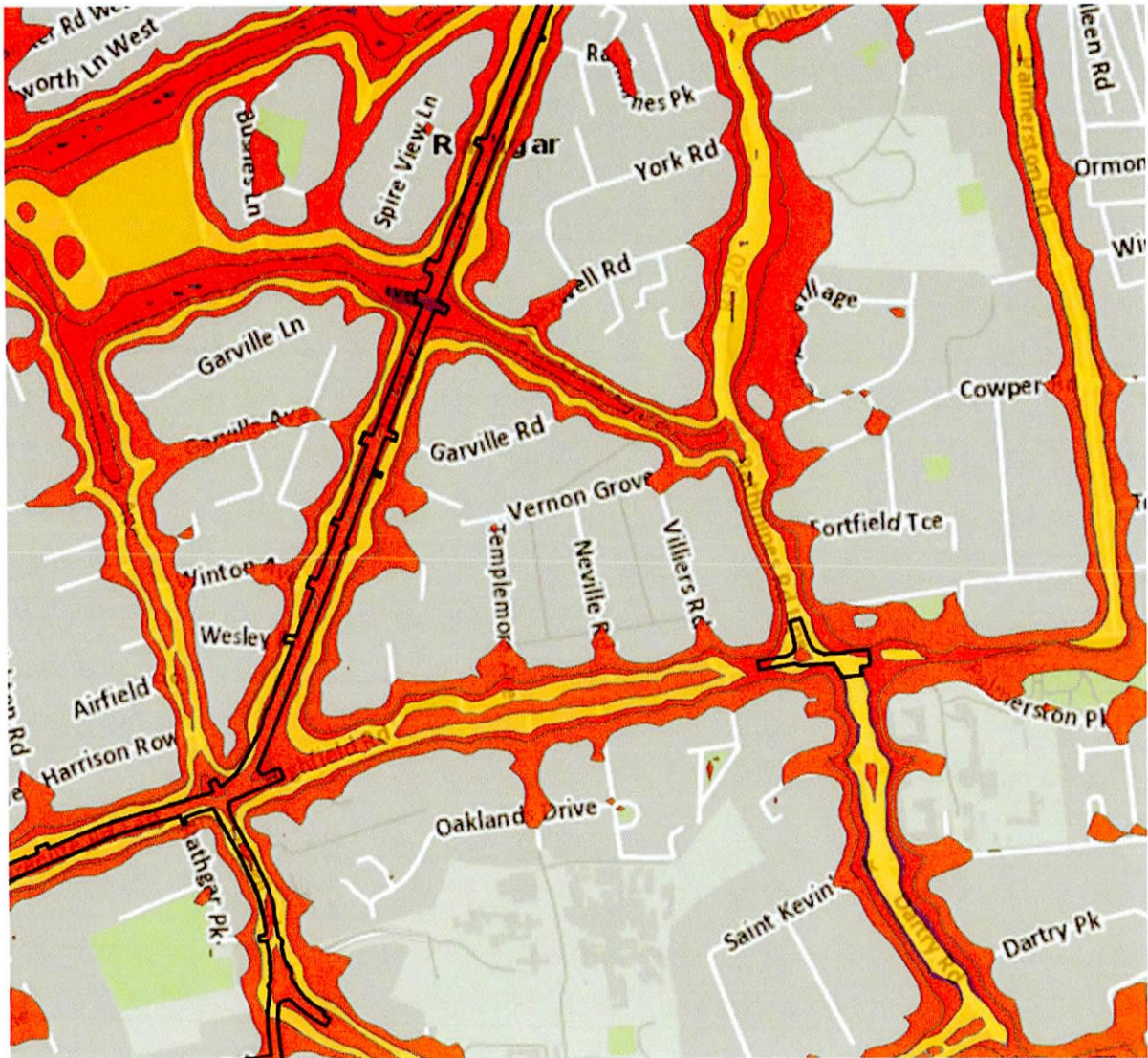
Therefore the One-way system on Rathgar Road needs to be revisited by NTA in the context of observations from Highfield Road and the balance of objections.

If the overall plan remains following observations, the plan for Rathgar Road should be reinstated and based on:

Rathgar Road is better able to handle the traffic volumes than Highfield Road as it was 1: developed as a main thoroughfare, 2: is wider than Highfield, 3: the houses are further apart for noise Gardens are consistently 3: There are fewer significant trees on Rathgar Road .

- Entering and leaving driveways
- Air Pollution as houses nearer Road vs any other part of the existing Rathfarnham to Town route. Extract below doesn't cover Highfield Road which I find unacceptable.
- Noise level – cost of upgrading windows / glass Ditto doesn't cover effect of combined traffic of 9k
- Risk of damage to the trees on the road by bus's and the pollution
 - We recently fought a builder to protect trees on the road so very engaged
- Increased driving to get to Dodder area / Dundrum, Ranelagh, Clonskeagh, e.g.:
 - Sample trips: Time, cycling and environmental cost when driving
 - Going to Dropping well 26% increase in distance 400m
 - Access to ambulances going to Mount Carmel if one way ?
 - To go to local super market Mortons for groceries increase 2-3.4k increase 1.4k
 - To get to Black Church increase of 1.8 to 3k increase of 1.2k

- Concentration of traffic on roads from Rathgar Rathmines will mean they are busy and difficult to get around
- Slip road is close so how will SuperValue large trucks get out
- All plans seem to be one way into town and no thought of how people will get out. Can't find Highfield road on any analysis



I believe the above observations are significant and material and should result in further analysis and reconsideration of the feasibility of this route.

Many thanks for taking to time to carefully consider same.

Kind Regards,

Pete & Emma Smyth