

An
Bord
Pleanála

Our Case Number: ABP-316272-23

Planning Authority Reference Number:

Residents of The Cloisters and Maple Drive Area
c/o Mary Kenny
3 Maple Drive
Terenure
Dublin 6W

Date: 14 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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An Bord Pleanála,
64 Marlborough Street,
Rotunda,
Dublin 1, D01 V902.

AN BORD PLEANÁLA	
LDG-	<u>065653-23</u>
ABP-	_____
11 AUG 2023	
Fee: €	<u>50</u> Type: <u>6959</u>
Time: <u>13:20</u>	By: <u>h-u</u>

3 Maple Drive,
Terenure,
Dublin 6w.

Date: 11/8/2023.

Proposal No: ABP/316272-23

“Templeogue/Rathfarnham to City Centre Core bus Corridor Scheme”

Dear Sir/Madam,

We make the following observations on the above proposal and enclose the €50 registration fee.

We would seek to address three main issues:

- 1. Whether the proposed corridor meets community need or public interest, including in the context of environmental concerns for our immediate area.**
- 2. Traffic diversion, specifically the transfer of traffic flow from major to minor roads within the proposals.**
- 3. Whether extending cycle lane provision in our area requires it to be linked to this core bus corridor proposal.**

Item 1. Environmental concerns demand that some shift from dependence on car usage is urgently required to achieve a low carbon and climate resilient city. We would argue that those public interests have to be reconciled with sustaining viable communities as far as possible, and that means recognising the level at which car use will continue for the foreseeable future, and not worsening its impact through lengthened car journeys and reduced air quality, which would appear to be substantial side effects of the proposed scheme. By the NTA's own admission there is little evidence of high levels of transfer from car use to public transport from similar schemes across Europe, (rather the expected outcome is to see greater cross over between pedestrian, cycle and bus use).

Quicker bus journeys and extra cycle lanes are, of course, desirable but the greatest incentive towards a major shift from the car would be through much improved frequency and punctuality of the existing service, and the introduction of a free service or introducing a much reduced fare structure. The proposal offers nothing but indications in relation to these matters. Specifically it indicates only a possible 10% increase in schedule across our area to achieve a 6 min improvement in total journey

time. This reduction is arguably achieved largely by removing nine bus stops off the most populated parts of the route. We struggle to balance that legitimate aspiration (including the cost of the proposed scheme) with the major impacts on traffic flow around our area. We would assert that the existing bus stops support wider public transport use by those most vulnerable members and groups within our community, and the proposed time saving is relatively insignificant in that context.

Even if we accepted the largely theoretic saving of six minutes in bus travel times to the city centre it will require an extra fifteen minute walk from our area to access it.

At the heart of the bus corridor proposal there is a major transfer of traffic from the Rathgar Rd to Harolds Cross Rd. NTA figures indicate a 25% increase in traffic on a road already under pressure at certain times of the day/week/year. The NTA, in its public documentation already identifies sections of Harolds Cross Road and adjacent areas as having issues of problematic air quality even before an increase of 25% in traffic flow. As residents of this area we find that unacceptable.

Item 2. While recognising the logic in the network of blocked roads and limited right/left turns that emerges from the corridor thesis it seems that they haven't sufficiently considered the impact on traffic flows, access to certain areas and congestion created at other sites. There also seems to have been little or no combined modelling of traffic flows in and around corridors. The banned right or left hand turns don't appear to consider the need for access by residents, or indeed to what extent the restrictions will be enforceable without a significant refocussing of garda time. There would appear to be issues created by the extra diverted traffic on roads e.g. Harold's Cross, Terenure Rd West, Fortfield Rd, Highfield Rd, in terms of traffic management.

We have concerns about wider traffic flow and any reduction in the bus service directly along Harolds Cross Road, given the recent increase in population along that route since this proposal was originally discussed with the NTA in 2017 and 2018. The route is now littered with new apartment blocks and has two recently established schools. We would add our support to those concerns expressed by Harolds Cross National School in particular and its parents group, that there will be increased congestion on Stanaway Road, Clareville Road and Harolds Cross Road as a result of the proposal, and more traffic via Mt Tallant Avenue to Larkfield Grove and Gardens and vice versa. Congestion around that school is already a serious issue and we see nothing in the plan that will do anything but augment it. Restricted private car users will be encouraged by restricted turns, etc., to use our area as a rat run to drive from the Terenure area to the Sundrive/Kimmage area on what are narrow residential roads.

Many residents have legitimate fears of extended commutes for work and family obligations (involving increased car emissions) as an inevitable outcome from these proposals

It also appears that in many areas HGVs will now be diverted into residential roads

and we see/hear of no plan to undertake the required work on these roads and pavements to allow them to support that use.

There is also a lack of clarity across the area as to where exactly trees are to be felled or not.

In many cases where Bus Stops are being moved or combined there has been no provision for bus shelters.

The provision of Bus Gates for Templeogue Road, Kimmage Road Lower and Kenilworth is introduced with the plan without any specific evidence of need and these will seriously extend journeys and travel time in cars. Residents travelling from our area toward Poddle Park area will be restricted in both directions, having to travel via Sundrive onto Stannaway Road and Captains Road to get there. There are many other examples of similar issues created by these proposals. Residents from other areas will no doubt address the issues created by having to travel along the canal route to get to the Church and adjacent parts of Rathmines. All local knowledge would seem to share these concerns. Accessing local amenities, shopping areas, parks and other leisure centres will be affected, but we would draw attention particularly to access difficulties to the Hospice at Harolds Cross from every direction. It will now, in many cases, involve convoluted route management.

Items 3. We have a significant stretch of cycle lane in our area and not only are we totally supportive of that but would welcome any safe extension of cycle lane provision. Equally though we recognise that cyclists represent only 7% of road users and transport provision has to reflect the widest spectrum of interests. Extending provision for cyclists should not be dependent on acceptance of this particular bus corridor plan. We do need greater and safer provision in segregated road space where possible, and better systems for policing that provision; but a desire to extend safe cycle lane provision is not in conflict with our response to these proposals, which, by and large, we believe specifically will push more traffic onto minor roads systems, extending polluting travel times and posing a wider threat to public safety.

Conclusion: Overall, as a group of residents we would like to be supportive of a genuinely inclusive transport plan for the area. We believe that there is an appetite for supportive change (and we have engaged in extensive conversation with local residents throughout this process) but, once again, what we are being offered is a package of hugely expensive proposals that lack cohesion and polarise road user groups in a way that we do not believe is helpful or necessary. We would also assert that if passed many of the proposed changes, in particular to traffic flow, will remain widely unenforceable and battlegrounds for activist groups within the local authority for decades to come.

We hold that proper planning will succeed in the interests of fairness to all within the community.

Thankyou for your attention,

The following is a list of Co-signatories from the Cloisters and Maple Drive area to the accompanying An Bord Pleannala submission NTA Bus Connect proposals: ABP/316272-23.

Templeogue/Rathfarnham to City Centre core Bus Corridor Scheme.

PRINT.	SIG.	ADDRESS.
Mary Kenny	Mary Kenny	3 Maple Drive
Susan Colgan.	Susan Colgan.	1, MAPLE DRIVE, The Cloisters
Josephine Keane	Josephine Keane	45 The Cloisters, Templeogue D6W FE44
STEWART DOWIE	Stewart Dowie	15 The Cloisters, Templeogue
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NIAMH M ^C CARTHY	Niamh M ^C Carthy	25 THE CLOISTERS.
Catherine Geaney	CATHERINE GEANEY	26 - -
NANCY BYRNE	NANCY BYRNE	26 - -
Kate Sheehan	Kate Sheehan	65 The Cloisters
NOREEN. WOODS	Noreen Woods	21 The Cloisters
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DEE DONOHUE	Dee Donohue	31 The Cloisters
MORTON LYNDIA	Lynda Morton	36 The Cloisters
VAN GLEESON	Van Gleeson	34 The Cloisters.
Brendan McKenna	BRENDAN MCKENNA	90 THE CLOISTERS
Claire Flanagan	Claire Flanagan	64 The Cloisters
JAMES MCKELTA	James McKelty	6 The Cloisters
NIKOLA HOVAN	Nikola Hovan	91 THE CLOISTERS.
KAROLINA HICKET	Karolina Hicket	2 MAPLE DRIVE, D6W
Sinead Grennan	Sinead Grennan	93 The Cloisters

