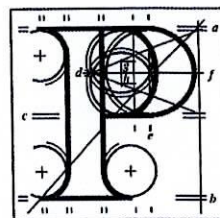


Our Case Number: ABP-316272-23



An  
Bord  
Pleanála

Templeogue Wood Residents Association  
c/o Anthony Cahill  
101 Templeogue Wood  
Templeogue  
Dublin 6W

**Date:** 17 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](mailto:laps@pleanala.ie)

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

*AP*   
Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

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|                    |         |  |
|--------------------|---------|--|
| Tel                | Tel     | (01) 858 8100  |
| Glaó Áitiúil       | LoCall  | 1800 275 175   |
| Facs               | Fax     | (01) 872 2684  |
| Láithreán Gréasáin | Website | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| Ríomhphost         | Email   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

|                      |                       |
|----------------------|-----------------------|
| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1  | Dublin 1              |
| D01 V902             | D01 V902              |

**AN BORD PLEANÁLA**  
LDG- 065561-23  
ABP- \_\_\_\_\_  
**08 AUG 2023**  
Fee: € 50 Type: Cheque  
Time: \_\_\_\_\_ By: RS Post

Anthony Cahill  
101 Templeogue Wood,  
Templeogue,  
Dublin 6W

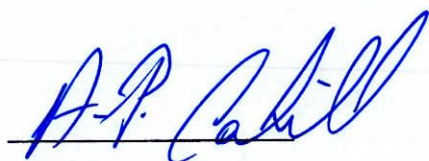
The Secretary,  
An Bord Pleanála.  
Strategic Infrastructure Division,  
64 Marlborough Street,  
Dublin, D01 V902

**Re; Templeogue/Rathfarnham to City Centre Core Bus Corridor H.A 29N. 316272**

To whom it may concern,

I enclose a submission together with the 50 Euro fee on behalf of Templeogue Wood Residents Association in respect of the proposed Core Bus Corridor Rathfarnham to City Centre (which incorporates the previous Tallaght/Terenure Corridor).

Yours faithfully,



Anthony. P. Cahill

Committee member

Templeogue Wood Residents Association

## **Executive Summary and Recommendation**

### **A) Summary**

The Bus Connects Project as envisaged has many laudable and welcomed elements not least the further expansion of bike lanes and other enhancements to the built infrastructure in many parts of Dublin (City/ Suburbs).

However, its primary and over-riding objective should surely be to enhance and improve the transport infrastructure in Dublin (City/Suburbs) and facilitate the efficient and safe movement of citizens around and within the city.

The proposed changes to infrastructure includes;

- I. Closing off access along well established historic main roads (Templeogue to Terenure/Kimmage to Harold's Cross)
- II. Imposing bus gates which will close off access to parts of the city from 6am to 8pm (14 hours) and at Rathmines bridge,...no access onwards at any time
- III. Diverting traffic along routes which will involve substantial increase in distances travelled (and time), as well as increasing congestion along the proposed diversions in areas unsuitable for such traffic
- IV. Isolating many districts along the proposed core bus corridors from easy access to other areas due to the widespread imposition of no entry regulations (no right turn/left turn-no through road) across the city
- V. Implementing an enormous programme of construction which will extend over many years and is likely to cause serious traffic congestion and damage to the environment and is also likely to entail a ballooning budget of capital expenditure at a time when there are many areas of public expenditure needing resources.

As well as involving a major change to infrastructure the project envisages an expansion of the bus network and capacity. The assumptions underpinning this part of the proposal are extraordinary both in terms of the numbers of buses required, and the speed with which they can travel to their destination.

Our colleagues from Orwell Park Residents Association and Willington, Osprey, Rushbrook and Kennington (WORK) Residents Association have done forensic work on the bus network part of this project and have outlined their findings in detail in their submission.

We fully support the findings in their submission to An Bord Pleanala in this regard.

### **B) Recommendations**

We strongly recommend An Bord Pleanala;

1. To refuse the application;
- OR
2. To approve the application subject to a range of conditions, not least:
    - Maintaining access to the major well-established roads through Terenure-Rathmines-City, and lower Kimmage road-Harolds Cross-City
    - Restricting the hours of operation of bus gates to peak travel times, e.g. 6am-10am and 4pm-7pm
    - Instructing the NTA to investigate the wider use of new technology to facilitate bus priority without the need for bus gates/road closures.

- Investigate the use of "congestion charges" for certain parts of the city particularly during peak travel times.
- Limit the level of construction envisaged in the plan and the land-take and removal of old trees.
- The NTA to commission an independent consultant's review of the entire bus connects plan for submission to the Dublin County Councils, other public representatives, and resident associations for consideration and discussion on possible options.
- The Department of Transport and the NTA to appoint independent consultants to undertake a study of the extension of the Metro to South West Dublin

## Introduction

The proposals from the NTA in respect of Bus Connects originally involved a series of information evenings in all the main residential areas affected by the proposals. These meetings began approximately 5 years ago but were dis-continued with the onset of COVID in March 2020. No further information evenings were organised. This is a major flaw in the communication process as there have been significant changes to the proposals for each corridor since March 2020. Up to March 2020 there were two separate corridors affecting Templeogue

1. Corridor 10: Tallaght > Terenure
2. Corridor 12: Rathfarnham > City Centre

These are now amalgamated into once corridor-Rathfarnham > City Centre.

This corridor now involves changes to what was originally envisaged without any process of consultation with all the affected residents associations.

The planning process associated with the Bus Connects project involves 12 separate planning applications without any attempt to reference this as but one part of an entire process with implications across the entire of Dublin City/Suburbs arising from changes proposed in each separate corridor.

The planning process could be compared to a 'silo project'. Citizens are being treated as if they live and only reside in their defined corridor and are unaffected by proposed infrastructure changes in adjoining corridors.

It is clear from the planning submissions made to date that the NTA are only concerned with improvement to pedestrian traffic, bike traffic and public transport. All the proposed infrastructure changes discriminate totally against private transport. This is a major flaw in the entire approach to improving transport for all in Dublin. Many of our citizens are of an age that cycling, or walking for any significant distance is not an option for them. Many are totally dependant on their cars to enable access to shopping, attending medical appointments, visiting friends or family, or visiting public parks and recreation facilities. Furthermore, most tradesman require their vans/trucks not only to facilitate travel but also to carry tools and materials. We are all aware that like the rest of Ireland, Dublin has an ageing population requiring support from professional carers and extended family.

The NTA proposals for major infrastructure changes to the road network layout and access will severely impact on all those using vehicular private transport to move about the city. This is a clear policy priority for the NTA which must be stopped.

Alternatively, the plans need substantial changes to accommodate access into, and from the main roads outside peak traffic times (for clarity 10am-4pm and 7pm-7am the next day), Bus gate restrictions, no turning regulations, no through road rules should only apply during peak traffic times also (7am-10am and 4pm-7pm).

## Review of the Proposals for the Bus Corridor Rathfarnham to City Centre

As already referenced, this now also incorporates the corridor previously identified as Tallaght to Terenure. This leg of the corridor commences at Spawell on the Tallaght Road and passes through Templeogue Village continuing along the Templeogue Road to Terenure Village. This has to be one of the oldest roadways in Dublin, at one time the tram to Blessington passed by what is now the Templeogue Inn licensed premises, affectionally known as the "Morgue" as some persons who were killed in accidents with the tram were "laid out" on the premises!

The proposals by the NTA for this road are almost tantamount to a "road closure". I will deal with the specifics as follows;

i. Current roundabout at the junction of Wellington Lane and Templeogue Road is to convert to a signalised junction

It is true that this roundabout is dangerous in that traffic coming from Tallaght onto the roundabout perceive it as a straight road because the roundabout is "off-centre" and the pedestrian traffic lights when green for traffic to flow forward only reinforces this conclusion. However, the Spawell Complex site and the land surrounding the roundabout provide enormous opportunity to re-imagine this junction.

The current proposals do not provide for a small land take at the Spawell Complex and a similar land take at each of the approach roads to the current roundabout which would facilitate the opportunity to reimagine the scale of the proposed signalised junction. This should be considered as part of the proposal.

Furthermore, the scale of the entire site at the Spawell Complex could facilitate a 'Park and Ride' facility with a shuttle bus running along the Templeogue Road into Terenure Village and turning left onto Terenure Road North into Harold's Cross.

ii. Bus Gate at the Junction of Olney Grove

There are many changes proposed to traffic arrangements along the Templeogue Road-through the village-and onwards in the direction of Terenure Place and Village. The most serious proposal is the development of a Bus Gate at Olney Crescent together with a series of "No Right Turns" to prevent traffic diverting "inappropriately" as per submission.

It is extraordinary that the NTA is proposing the effective closure of this major road which allows access onwards to Terenure, Rathgar, Rathmines and the city. This road has existed from the time of the extension of Dublin City westwards from the city centre and has served all the communities living along the trajectory.

This proposal in itself demonstrates the absurd and futile nature of the Bus Connects Strategy. It is not about improving the capacity of the system to provide improved mobility within and around our city but rather to rid Dublin of private vehicular traffic as far as is possible.

Operating a bus gate at peak traffic times (7am-10am/ 4pm-7pm) together with bus priority signalling, congestion charges and park and ride facilities would show that the NTA planners have addressed Dublin Traffic Congestion in an imaginative and professional manner. Instead, a blunt force instrument of banning private vehicular traffic from many of our major roads for most of the days is their major policy proposal.

iii. Terenure Road East, Rathgar Road, Rathmines Road lower, Richmond Street South, Camden Street Upper and onwards to South Great Georges Street

From Terenure Road East onwards there are enormous, proposed changes to the road infrastructure, proposed land take, introduction of bus gates, new one way only roads for private vehicles etc. At Rathmines Bridge, in-bound general traffic will be required to turn left onto grove road, this road runs adjacent to the canal and is a narrow road which suffers from major traffic congestion already. To suggest that all traffic turn at this point is extraordinary and demonstrates that the intention is not to facilitate private vehicular traffic at all as the road does not have the capacity for additional traffic.

There are well established communities that live along and adjacent to this major corridor who will be subject to significant construction activity which will impact not only on transport in the areas affected but huge environmental damage also. In addition, people living in Templeogue will be severely limited from access to all the village and communities along this road.

Has the NTA undertaken a cost-benefit analysis of their proposals? We have asked many times over the past 5 years if consultants were employed to develop a computer-based model of all the changes: timeframe, costs, environmental implications and the benefits. Up to recently the NTA informed us that no such computer-based study has been undertaken.

The scale of what is proposed on this corridor will be repeated on each of the proposed corridors to a lesser or greater extent. It would be grossly irresponsible for An Bord Pleanala to approve such developments in one big approval process (each of the individual corridors representing a part of a wider overall programme) without certainty as to its costs, environmental impact, sustainability and benefits.

## Consideration of Reasonable Alternatives: Chapter 3 of Planning Application

This chapter is 60 pages in total and in its conclusion makes the following statement;

“The proposed scheme has been the subject of a systematic and comprehensive assessment of reasonable alternatives...informed by extensive engagement with residents, businesses, the local authority...public representatives and the general public.”

This statement is disingenuous in that it does not declare that any of the parties consulted supported the proposals. Indeed, most do not support the proposals.

Furthermore, many of the plans to be submitted (for other corridors) are not yet finalised and have not been submitted to An Bord Pleanála and therefore are not available for scrutiny and review.

Let us be clear on this point. Most of the local politicians for the Rathfarnham/Templeogue/City Corridor have attended meetings with local residents' groups over the past 3 months (and as far back as 5 years ago) and declared their support for opposing the NTA plans in the form now being submitted. An Bord Pleanála should request written proof from the NTA regarding their statement in this regard or be forced to retract the statement. It is also extraordinary that the NTA did not reference two other studies on their planning submission;

1. “A Platform for Change” which was written over 20 years ago and I quote from as following;

“Examination of the passenger flows on the main orbital and radial bus routes shows that many of the radial bus routes would be well over capacity...In addition the physical infrastructure required for the frequency of buses would greatly reduce the capacity for cars and goods vehicles”.

and

2. C.B.C Feasibility Study and Options Assessment Report, dated December 2017, written for the NTA by DBFL Consultancy Engineers and Transportation Planners.

This study dealt with (amongst other things) the proposed Clongriffin—Tallaght route and stated;

“The CBC (core bus corridor: Rathfarnham to City Centre) should complement the BRT service and not duplicate the potential routing of the Congriffin-Tallaght BRT route which is linked to travel via Harold's Cross corridor”.

This project has since been abandoned.

The NTA are now proposing that almost all the buses coming from Rathfarnham and Templeogue should travel along Terenure Road East and indeed are planning a significant increase in bus numbers. This increase in traffic volume (of buses) cannot be accommodated along this road without further and more onerous restrictions being implemented for private vehicular traffic.

Harold's Cross will it appears have less buses traveling through the area. The increase in population accessing from the very significant construction of apartments and houses along the Terenure road North and Harold's Cross Road, and Lower Kimmage Road over the past 3 years is estimated to have increased the population by approximately 50% in this area.

The reality is that Bus Connects in its current form is using very out of date estimates of population density and ignoring the opinions of citizens and their public representatives. In addition,



they are using 'selective reports' commissioned by themselves and no independent research to put forward the case to An Bord Pleanála for the approval of their plans.

The NTA admitted in its own documents (Public Consultation, January 2019, P.3.) that:

"Growth areas can only be served in the short and medium term by the bus as opposed to long terms projects such as rail and Luas."

The cost (estimated 4.2. billion euro) and timeframe of construction for Bus Connects will clearly be such that this project will be hopelessly redundant before it is completed. The enormous cost and disruption this project (entire Bus Connects Programme) will entail should raise concerns as to the probability the costs will escalate in the present inflationary environment. There are also likely to be significant legal challenges to land acquisition that will make the timeframe for construction and completion probably closer to 10 years.

### The Flawed Process Revisited

When the NTA commenced its series of public consultations approximately 4/5 years ago they provided booklets containing road layouts and details of the proposed construction work to be undertaken. This was essential as it allowed people look at the proposed changes along other corridors in proximity which would directly impact them. One such corridor of interest to people living in Templeogue was the Kimmage to City Centre CBC.

Persons residing in Templeogue would mainly use the Templeogue Road to Terenure Road or KCR-Lower Kimmage Road. We don't reside in a "corridor", we reside in communities (residential housing estates) with many local roads which ultimately require access to one of the major roads to move outside our immediate area.

Despite repeated requests to the NTA for information on the revised Kimmage to City corridor we have no engagement from them. The revised Kimmage/City Corridor plan was only released in the past week (week commencing 24<sup>th</sup> July 2023).

The proposed changes outlined in the revised documentation would mean residents of Templeogue will not be able to travel to the Kimmage area, or Harolds Cross, without making long detours to comply with restrictions associated with bus gates (Lower Kimmage Road), and other restrictions.

Residents of Templeogue will be effectively "marooned" in their immediate area as the two main roads-Templeogue Road and Lower Kimmage Road-will be subject to measures designed to prevent travel along these roads and onward progress to adjacent areas.

### Concluding Comments

The scale of change to the road infrastructure along the Rathfarnham-> City Centre CBC is extraordinary. It appears the planners here decided that the way to rid the route of private transport (cars, vans, trucks) is to make driving all the route impossible through a series of bus gates, turning restrictions, major diversions off the road entirely i.e. Rathmines bridge, and to repeat this all along the entire route.

It is only when following the route map in detail to the city that one realises the massive vandalism that will be visited on a major, and historically important, route that links many of the oldest residential communities/villages in Dublin.

The projected cost of the entire project will likely be exceeded multiple times, as also the construction timeframe. This 'infrastructure folly' is to be justified by reference to a 'massively improved' bus service. The assumptions underpinning the bus service capacity has been addressed in detail in other submissions from WORK and Orwell Park residents' associations. A key point in these, and other submissions, is the capacity on Terenure Road East to handle the enormous, proposed numbers of buses turning onto that road.

Residents of Templeogue are being denied travel to Terenure and onwards by the operation of a bus gate at Olney Crescent. Even if they succeeded in rejoining Terenure Road East, there is a complete ban on traffic at Rathmines bridge requiring a turn on to Grove Road, already heavily congested.

Residents of Templeogue are also being denied access along Lower Kimmage Road. Unfortunately, the NTA have only recently submitted details of their revised plans for this route which makes it very difficult to comment further.

One cannot but feel that this was deliberately contrived by the NTA as this is the second major road used by Templeogue residents to move across the city.

The plans for each "corridor" do not consider the implications for developments in adjoining/or proximity corridors. It is as if each "corridor" is an island to itself. An example of this is the "barrier" to general through traffic at Rathmines Bridge requiring general traffic to turn left onto grove road where it will then join a different corridor at Harolds Cross Bridge (Robert Emmet Bridge). So two corridors are now in play-but each subject to separate planning proposals.

Again, the Rathfarnham/City Corridor-the Terenure Road North part of this corridor gets limited attention until the junction at Harolds Cross Road/Kenilworth Park and Kenilworth Square North/Rathgar Avenue where there is a proposed Bus Gate development-again this is a part of intersection involving two corridors: Kimmage > City and Rathfarnham >City.

This vividly illustrates why addressing the planning for each "corridor" separately is sub optimal in terms of evaluating the overall impact on the districts and communities affected by these two applications.