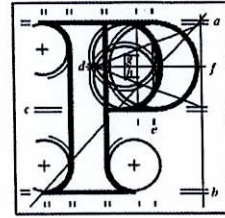


**Our Case Number:** ABP-316272-23



**An  
Bord  
Pleanála**

Terenure Residents Association  
Terenure Enterprise Centre  
17 Rathfarnham Road  
Dublin  
D6W X921

**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](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,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

HA02A

Teil	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,  
Strategic Infrastructure Division,  
64 Marlborough Street,  
Dublin 1,  
D01 V902  
August 9<sup>th</sup> 2023.

**AN BORD PLEANÁLA**  
LDG- 065667-23  
ABP- \_\_\_\_\_  
14 AUG 2023  
Fee: € 50.00 Type: Carcl  
Time: 12.06 By: hanc1

Re: Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme (ABP- 316272-23)

Dear Sir/Madam,

General Introduction.

Terenure Residents Association (TRA) represents a distinct area of some 800 households, encompassing Terenure Village, five busy approach roads, side roads and estates. Our area and residents are greatly impacted by the proposed Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme and our observations relate to impacts within our general catchment area.



The proposed development treats Terenure merely as transport corridor, prioritising through-traffic over local movements and ignores the fact it is a vibrant urban, heritage village with a thriving community. We believe that Terenure would be severely impacted by this development in terms of loss of amenity, restriction of access, reduced commercial activity and damage to heritage streetscapes and trees. TRA opposes CPOs for road widening and are very concerned about the impacts of traffic redirection due to bus gates and other restrictions. Whilst the objectives of reducing congestion, and improving public transport and cycling infrastructure are commendable, the limited, short-term

benefits of the proposed scheme are not proportionate to the scale of destruction and environmental impacts.

Additionally, due to the limited capacity of the scheme, this project will do little to address the reliance on the private car within the catchment area - a fact that is fully conceded in the current Greater Dublin Area Transport Strategy 2022-2042 (GDATS).

Due to the extensive and complex impacts of the proposed scheme, TRA request that an Oral Hearing be held. Because of the piecemeal and separate application of each of the core bus corridor schemes, it is imperative that the combined impacts of the schemes are assessed in full.

### Environmental Impact Assessment Reports- Traffic

The proposed bus gate and right-turn bans into Rathdown along Templeogue Road will result in diversion of inbound traffic onto Springfield Road and then Rathfarnham Road. The bus gates in the Kimmage to City Centre Scheme (application for which was made separately) will result in diversions onto Terenure Road West and also onto Springfield Road and through to Rathfarnham Road. Proposed bus gates in Rathmines means that all city traffic will travel via Terenure Road North/Harolds Cross or via Ranelagh. Traffic returning from Rathmines will be diverted widely and circuitously onto narrow, mostly unsuitable streets. The NTA acknowledges there will be increased traffic on all these routes. This also means an increase in noise and air pollution (from car emissions as well as that generated from tyres and brake material – the consequences of exposure to which are only beginning to emerge). This is totally unacceptable.

The **combined impact** on traffic within the two corridors (Templeogue/Rathfarnham to City Centre and Kimmage to City Centre) has not been investigated or presented and the EIARS are clearly deficient in this regard.

Traffic counts and analysis were carried out pre COVID and as such provide invalid and unreliable information for the purposes of EIARS for the current scheme.

An expectation of 77% increase in commercial vehicle journeys by 2043 is noted in the GDATS yet commercial transport journeys were not considered in any EIAR. Although it is suggested that in the future that commercial deliveries could be scheduled before peak morning traffic, there are no provisions in the proposals for this. The proposals also fail to properly consider the impact of the scheme on commercial transport behaviour, the impact on local commercial interests and the impact of rerouting of heavy vehicles onto unsuitable roads. In Terenure Village, the removal of the slip road from Rathfarnham Road onto Terenure Place could prove problematic for heavy vehicles. Additionally, there are no controls proposed for HGVs throughout much of the affected areas in comparison to the controls between the canals.

### Proportionality

The proposals, with resultant impacts, are not proportionate to the small improvement in transit times, nor are they proportional to the expected short lifespan of benefits of the scheme.

According to the EIARs provided, from commencement of operation (2028), transit time improvements are likely to be

- Templeogue to Terenure peak time bus transit times will only improve by 1 minute

- Rathfarnham to City Centre peak time transit will only improve by 5-6 minutes.
- Off peak transit times will remain much the same as current.

However, bus transit times improvements will be **generally eroded by 2040/3** – giving approximately 12-15 years of small, peak -time-only, limited benefit despite all the investment, destruction and upheaval.

### Consideration of Alternatives to Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme.

The GDATS identified that the Templeogue/Rathfarnham scheme will require upgrade to light rail by the early 2040s. The GDATS also concedes that both private and commercial transport will increase significantly along this corridor and acknowledges the limited capacity of Bus Connects. From the EIARs it can be seen that the maximum transit time benefits of the proposed Templeogue /Rathfarnham Scheme are predicted to occur at commencement of operation (2028) but *all benefits will be fully eroded by 2043* giving a mere 15 years of very minor benefit. However, the EIARs completely failed to properly consider the alternatives of Luas or Metro – more strategic, long-term options. It is utterly baffling to consider the permanent destruction of an established and unique urban village environment for a multi-billion euro proposal with the lifespan of a washing machine.

### Consideration of Alternatives to CPOs and Road Widening.

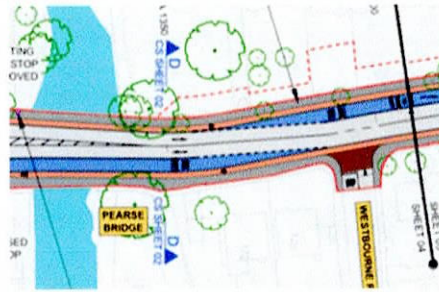
Rathfarnham Road- Pearse Bridge to Rathdown Park/Rathfarnham Road Junction

The road widening proposed on this section of Rathfarnham Road is **purely to achieve one extra cycle lane**. Full bus priority is to be achieved by reallocation of 1 general traffic lane. Therefore, the proposed land acquisition by CPO for one cycle track is disproportionate given the resulting breach of Building Regulations Part M together with extensive CPO costs, destruction of streetscape, and impacts on the amenity and the environment.

A simple, cost effective alternative to road widening for cycling provision is to **provide a cycle track on the inbound, uphill section of Rathfarnham Road, with outbound cyclists sharing the downhill bus lane**. As this road is to be designated a 30KPH zone, cycling facilities as suggested above would be exactly the same as those proposed widely throughout the Bus Connects project. e.g. on Terenure Road East.

Rathfarnham Road (Bushy park Road to Beechlawn Way)

Instead of land acquisition in this location, a design of **dovetailing bus lanes** could be employed over this section of 150m (see diagram below). This design is proposed already north of Pearse Bridge, Rathfarnham Road and is the design of choice proposed for other corridors e.g. the Merrion Road (Belfield/Blackrock to City Centre Core Bus Corridor Scheme). Dovetailing here would obviate the need for land and would give excellent bus priority as well as full provision for cycle lanes. It is inexplicable as to why this design was not proposed for Terenure. This alternative solution is simple, cost effective and protects the fabric of our urban village.



### Terenure Road East

Bus Priority Signalling is currently in situ at 55 Terenure Road East for outbound traffic but it is not fully operational and therefore its effect has not been analysed. The current proposals suggest moving this signal 150 metres westwards to St Joseph's Church, with extensive CPO of historical boundaries (many listed on the Record of Protected Structures) for road widening. This yields no material advantage whatsoever particularly as outbound traffic will already be significantly reduced. This proposal will create significant destruction of amenity, heritage, listed structures, trees/environment, etc., destroying one of Dublin's nicest historical streetscapes without creating any appreciable gain. Operationalising the current bus priority signalling is the most cost effective, least destructive option.

### Breach of Building Regulations Part M – CPOs Affecting the West Side of Rathfarnham Road (Pearse Bridge to Rathdown Park Junction).

Department of Housing, Local Government and Heritage, Building Regulations Part M relates specifically to gradient and accessibility of dwellings and states that development may not result in a further worsening of conditions even where the original property is already in breach of regulations. Proposed CPOs affecting the west side of Rathfarnham Road (51-71) are likely to cause a material breach of Part M and as such should not be approved.

### Contravention of Dublin City Development Plan

The proposed land acquisition/CPOs for road widening is at odds with Dublin City's objectives regarding Z2 Residential (Conservation area) which aims to protect from unsuitable development that would negatively impact the architectural quality and amenity of the area. Similarly, the proposal is at odds with Dublin city Development Plan regarding protection of built heritage and safeguarding of built structures and curtilage that appear of the Record of Protected Structures - specifically, numbers 52,54,54,58,59,61,63,67,71,74,76,78.

### Sustainability- Park and Ride

There are no Park & Ride facilities provided anywhere along this proposed bus corridor. This indicates that there is no expectation that commuters will transfer to bus and unfortunately solidifies the expectation that private vehicles will dominate transport modes along this corridor. This is an unsustainable approach and at odds with all climate and national objectives.

### Bus Gate Time Plating

Bus Gates on Templeogue Road are proposed to be operational between 6am and 8pm, seven days a week. This is overly restrictive for residents accessing their homes and environs and will generate congestion on diverted routes. The operation times of the bus gate were not properly considered in the EIARS and no analysis or justification presented.

### Turn Bans

24/7 right-hand turn bans into Rathdown Avenue and Rathdown Park from Templeogue Road are overly restrictive for residents accessing their homes and their environs and would necessitate significant diversions with congestion on diverted routes. Similarly, left turn ban from Olney and Greenmount are unduly harsh for local residents' movements. This was not properly considered in the EIARS with no analysis or justification presented.

### Public Realm- Village Area.

Special footpath paving in the village area is welcomed. Otherwise, there is little in the way of public realm improvements provided in the proposals. However, there is a significant reduction of footpath width outside Post Office/Centra on Terenure Road North – the busiest pedestrian area of the village. This will have a negative impact on circulating pedestrians and village amenity. There is no provision for special road surface denoting the central village area and this would have a negative impact as a special surface would contribute to placemaking and would have a positive impact on slowing traffic. No other improvements to public realm have been proposed. It is baffling as to why a proposed project of such magnitude and impacts has not been designed in consort with the local authority and should involve a Local Area Plan.

### Summary

The impacts of the proposed scheme are disproportionate to the limited, costly benefits. There has not been adequate consideration of alternatives in terms of other mass transit solutions as well as failure to consider more proportionate road designs and traffic strategies which would avoid land acquisition and protect the fabric, amenity and environment of Terenure.

On behalf of,

**Terenure Residents Association**