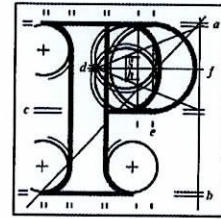


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

The Barber Family
66 Terenure Road East
Terenure
Dublin 6
D06EF90

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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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902

Bus Connects Submission to An Bord Pleanála in respect of the Templeogue/Rathfarnham to City Centre Core Bus Corridor

Bord Pleanála Case Reference: HA29N.316272

Written By The Barber Family

Home Address: 66 Terenure Road East, Terenure Dublin D06EF90

Email: barberfamily@templeoguerathfarnhamscheme.ie

Tel: [REDACTED]

We, the Barber family of 66 Terenure Road East D06EF90 wish to present the following observations about the proposed bus corridor which will greatly impact our road and the folks who live there. We have discussed this with our neighbours and are of the same mind in relation to these observations.

FLAWED INITIAL PREMISE

I will look at as many aspects of the plan that directly impact our quality of life, that of the flora and fauna that we have the privilege to share the road with and also the general impact on the daily life in this particular area of the city. We are totally mindful of the need to move people around the area in an efficient manner and to enhance the quality of cycling and walking infrastructure.

We are aware that the cost of this corridor is significant in terms of the compulsory purchase of land along the route, the build cost and all of the fees including consultancy, design and legal fees. The stated aim of the scheme is as follows:

*The aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver **efficient, safe, and integrated** sustainable transport movement along the corridor. The Proposed Scheme is a key measure that delivers on commitments within the National Development Plan (2021-2030), the Transport Strategy for the Greater Dublin Area (2022-2042) the Climate Action Plan (2023) and the National Planning Framework 2040¹*

¹ [Home - BusConnects Dublin - Templeogue/Rathfarnham to City Centre \(templeoguerathfarnhamscheme.ie\)](https://www.templeoguerathfarnhamscheme.ie/) cover page

If we agree that the key measures are: efficiency, safety, integration, and sustainability the plan fails on many of the basic assumptions about this area.

When we arrived in Terenure 40 years ago Terenure Road East was full of low quality bedsits in fabulous period homes. My grandparents had lived in a flat in 24 Terenure Road East in the 70s and the whole house was a wreck. In the intervening period these houses have been loving and creatively restored into family homes and better quality apartments. As a result of this change over 3 decades both Terenure and Rathgar have become city villages with stable ownership often transcending generations. We have much historical detail in our area with a 3mile mark located right across the road from our home. This is an integral part of the history of the area and was restored and re-instated by DCC comparatively recently.

The area has a high number of Grade 1 listed buildings and the compulsory purchase of tracts of garden to facilitate a 4 min improved journey time makes no sense. It diminishes the feel of the area and the potential removal of capital trees along our section of the route would not be in keeping with the Climate Action Plan 2023. Not only do these trees sequester carbon, thus ameliorating our carbon footprint, they also provide homes to many species of birds, small mammals, and in particular a sizable bat colony located across the road from my home. We take pleasure in observing the 17+ species of birds who visit our garden including a sparrow hawk pair. There are squirrels, foxes and other city mammals active in the area who would be seriously discommoded by increased traffic and the disruption that the associated works would create.

There is also a flawed thinking that all journeys through this area are heading for town. This is in error. Many travel out of the area and away from the city centre. By reducing access along main routes these cars will be forced into the more residential streets – which incidentally were not part of the original or subsequent residents’ consultations. Friends in Brighton Road, and Highfield Road has no idea of the potential changes in traffic direction and volume being planned for them. So this again highlights inadequate consultation with residents of all the streets off the main corridor route, as if these two majorly impacted routes were not consulted it is highly likely that many others were also excluded.

So there is a likelihood that a lot of essential car journeys will flow through a very small number of roads rendering them stationary due to sheer traffic volumes.

In relation to schools, removing bus routes from certain roads in the area will exclude many families from choosing to take the bus. The 15B serves 5 local schools at present and removal of this will not serve the area well. It will increase traffic into Bushy Park Road which is often at a standstill already during peak times.

The NTA, already state that the roads surrounding the main corridor will have increased volumes of traffic and the figures below are taken from their own published data. As you can clearly see their are significant omissions – namely the roads directly off Terenure Road East, Rathgar and Highfield Roads.

Rathdown Park	189 to	305	
Kenilworth Park	760 increase to	885 am719 to	893 pm
Kenilworth Sq N	381 to	511 am348 to	474 pm
Kenilworth Sq South	145 to	330	
Kenilworth Road	348 to	481	
Orwell Park	585 to	736 am372 to	575 pm

With so many extra vehicles passing through quieter residential areas it will impact on many of us trying to come and go from our homes. I have no doubt that there will be longer queues and more irritated drivers sitting in stationary traffic due to the increase in volumes. This will also add to the environmental impact and potential air pollution, as we are not all about to go electric, despite everyone's best hopes. The environmental cost of this potential air pollution must be factored in, as there is bound to be an increase in pollution in these smaller residential streets as well as overall. The sustainability reasoning simply doesn't exist.

"Environmental Impact Assessments should be obliged to consider the accumulative effect of all of the bus corridors, not merely each one in a silo, that is neither accurate nor reasonable". Cllr Mary Seery Kearney

No one has mentioned lorries and other distribution vehicles. There is already a ban on large lorries coming into town at certain times, so what happens to these necessary vehicles when they can't travel down the proposed bus corridor?

Walking

Walking in the Rathgar and Terenure area is safe, well lit and adequately served with safe places to cross the road. My children and their pals have happily moved around the area on foot for all their lives, to and from schools in the area and, while the area is busy it has been manageable even for younger school goers. With the exception of the terrible but necessary LED lighting the walking potential of the local area will not be significantly impacted and the newer improvements to the cycling infrastructure through Bushy park also facilitates safe walking around the proposed corridor. So that's a plus! I'm not sure however if the significant numbers of elderly in the area who potter up and down between Rathgar and Terenure to the Evergreen Club will enjoy walking down a buss corridor, devoid of mature trees and pleasant ambiance that currently exists.

Cycling

Cyclists are one of the few groups who will benefit from the proposed Bus Corridor as they have been well catered for in segregated lanes. Both my sons have had significant injuries, one resulting in fractured eye socket and brow bone. One was hit by a vehicle, a taxi using the bus lane, and the other was catapulted off his bike by a giant anomaly in the structure of the road.

However, a major problem that currently exists, still exists in the new plan – the sudden ending of a cycle lanes at junctions to allow larger vehicles right of way. This was the direct cause of my son's accident where the taxi cut across the bus lane into the cycle lane 100m before the cycle lane disappeared. This is a regular cause of cyclist accidents. This is a very significant flaw as it prioritises the potential minutes shaved off bus journey times over the safety of cyclists who are obliged to road share without segregation for significant sections of the road on a 24/7 basis. The balance is completely wrong to prioritise bus routes over cycling where the need is 24/7. There is actually no cycle lanes at all on Terenure Road East. Cyclists will have to use the bus lane as far as St Joseph's and then be forced to use the general road.

Also of concern is the width of cycling lanes. These should be 2m, as set out in the National Cycling Manual. This minimum of 2m is not reached all along the proposed route. This means that cyclists have to travel less than in the recommended space on the road alongside traffic that can knock them

off due to proximity. We need to seriously look to countries where cycling infrastructure takes precedence such as the Netherlands. The entire country cycles everywhere.

Bus Stops

Bus stops are being removed. Of course this will bring about shorter journey times as the bus isn't stopping as often. It is a totally cynical exercise to dress up reduction in journey time because it does consider the ability of elderly or infirm passengers to get to a stop. For example:

- Outbound bus stop at Westbourne Road removed
- The inbound bus stop at Lakelands Park will be removed
- The two bus stops at Our Lady's will be consolidated into one with no bus shelter. These directly affect children on the way to school
- Bus stop at Rathmines Park removed. It will be necessary to walk to Circle K on Rathgar Rd.
- Bus stop at Garville Ave inbound removed to Winton Avenue
- Outbound bus stop at Brighton Road removed
- Inbound bus stop near Brighton Road moved to Rathgar village

Locating bus stops closer to what will be major junctions that are going to be incredibly busy defies any logic. Ask any of us who use the buses regularly! We weren't asked – neither were the bus drivers.

Flawed traffic modelling and counts

The traffic counts that formed the basis of these plans were done pre-covid and do not reflect the post covid experience of regular working from home. A recent announcement that Ireland has been the country in the EU that embraced remote working the most. This has not been accommodated within the modelling.

Elderly and Disability Access

The public transport system has very little equality of access for the people with mobility issues. While taxis will be able to use the bus corridor, all other private transport will not. It would seem reasonable to allow blue badge holders to access these routes as often they are unable to use public transport in its current form. The entire bus corridor plans need to be re evaluated with the rights of persons with disabilities and the elderly in mind. We also have St Lukes hospital in our area. Journey times will double with a 6km circuitous route to access Highfield road if it becomes an outbound only route.

Parks, Sports Facilities and Playgrounds

Children need lifts from parents to get to Bushy Park for the myriad of sporting activities provided there. Access to this park is going to be very limited as a consequence of the Templeogue Road changes. Cars are going to try and park on the already overstretched Fortfield Road and walk down. The alternative there is going to a huge round trip along the Dodder View Road onto Rathfarnham Road and into Rathdown to park and access Bushy Park.

Heritage

Terenure Village, Templeogue Village, Rathgar Village are all villages with independent histories. We love our city villages and the fact that they are distinctly different. The CPOs to facilitate this corridor are going to destroy trees that have witnessed centuries of change, the form curtains to the Georgian and Victorian character of the beautiful houses along the route. Before this heritage is destroyed it

must be absolutely necessary to make the changes for the greater good. No discussion has convinced this household of the 'greater good'.

Disproportionate Impact For Very Little Gain

The boast of the NTA is increased capacity and reduced journey times. In our area both the 15 and 15B are impacted NEGATIVELY by removal and reduction of services and yet the 15 serves Stocking Lane and environs – an area of rapid growth and development.

We cannot bully through bus routes to effect climate change while causing traffic chaos that will increase air pollution, reduce footfall to businesses and inadequately deal with the need to provide complete cycling infrastructure. We must have consistency in decision making – we cannot rob Peter to pay Paul and this plan appears to do that.

Looking to the future. Why were the reasonable alternatives such as Metro or Luas given serious consideration before an assault was launched on us under the guise of improved transportation? 4 minutes for 2 Billion is a very poor return for investment, given that the capacity of the plan will expire in the same duration as we have already outlined in our opening paragraph.

It is not just us residents who use public transport, people coming to Dublin for matches, music gigs, hospital appointments and a plethora of other reasons also pass through our areas and a significant portion come by car. If the bus is envisaged as a 24/7 travelling system, then why are there no plans for park and ride opportunities throughout the entire bus corridor network – there isn't one!! If the bus gates are needed for Sunday traffic then accommodate all Sunday traffic including those who travel to Dublin for events.

Under the current plan there is huge agglomeration of bus corridors influencing a relatively small area outside of the city centre. Templeogue, Terenure, Rathgar, and Kimmage are such an area. This is not typical over the entirety of the network around the city and creates a disproportionate burden on many of the communities living there. There are larger numbers of older people who will be affected by these changes to their locale.

The timing of some of the bus gates is unreasonable and will cause detrimental lowering of the quality of life of all of us residents in these areas. We will all have to drive much longer routes to get in and out of our own roads to access hospitals, doctors, dentists, schools and shopping areas.

Flawed Public Consultations

Two of the three public consultation periods took place at the height of the covid pandemic and physical public meetings could not be held. Meetings were held on line and engagement was very strictly controlled. This does not constitute public engagement. End of!

The entire process of dealing with the public consultation and CPO issues was insanely difficult. I am an intelligent, university educated woman and the attendant paperwork was made un-necessarily complex, thus preventing many from making written submissions. Only for the due diligence of our public representatives and Resident's Associations there may have been many less observations submitted. We were expected to read and digest thousands of pages of text and figure out how the new corridor might impact on daily too-ings and fro-ings. It was completely unsatisfactory and unfit for purpose.

The public meetings were a better for a as we got the easy version from which we could extract the substantive information needed to make a comment. Far from ideal for such a plan that will impact our lives significantly – and not in a good way. The methods used by the NTA have been underhand to say the least.

Most of us were cowed into submission with lengthy reports and down right abuse. In my own case I was consistently referred to as ‘the pinch point’ by officials I met with. This was due to the fact that our Grade 1 listed home (saved from dereliction by years of hard work that is still on-going) was inconveniently located at an angle to the main road of Terenure Road East, thus creating a ‘pinch point’ on the proposed route. I assured them our house would incur significant structural damage if their CPO was to go ahead and had some evidential materials to share. It was ignored.

I attach below the following paragraphs from the wider community submission made by Cllr Mary Seery Kearney et al as it encompasses our thinking entirely about lack of genuine consultation:

“ Engaged meetings with a collective of representatives Residents Associations all in the same room at the same time would have been effective and constructive. That never happened! The Preliminary Design Report for this corridor cites stakeholder engagement and lists representatives groups – representatives of what? In many instances when requests went in for meetings with Residents Associations, this was rejected and Residents Associations were met on a one to one basis, never as a collective. Consequently, arrangements are included that favour one residents group at the cost of others. Again this cannot possibly constitute adequate stakeholder consultation. I believe that the NTA has left themselves wide open to a challenge under the Aarhus Convention for a failure to properly engage in public consultation.

I have a plethora of emails from bus drivers employed by Dublin Bus and Go Ahead – none of whom were consulted in the course of this process. I have searched the 325 page document Preliminary Design Report for the words “Dublin Bus” and they appear once! That is on page 88 in the context of the discussion on bus stops. Why weren’t bus drivers consulted for their views on how improved travel times might be achieved?

If affected Residents Associations and bus drivers weren’t engaged with in any meaningful way in the course of this process, as two groups who could have given the best insight into how to achieve the objectives, then on what basis was the contributions of the other stakeholders taken on board. Are they not theoretical merely rather than having the lived experience of how things are and how they might be improved? It is scandalous that these two groups were not meaningfully engaged with.

With due respect to An Bord Pleanala, it is very difficult to imagine how you might go about your adjudication on this planned route. This isn’t a planning application for a residential development where the rules of engagement are clear and consent by reference to planning law can be anticipated. The methodology of adjudication should have been published so that the public could know how to make observations within those criteria. Very little is known about how An Bord Pleanala will go about the review of this planning application. The An Bord Pleanala criteria and methodology should have been published and therefore even this phase of the planning process is deeply flawed. Is every proposal under scrutiny and what will be the rationale for their acceptance or refusal?

Amendments to turns and road markings usually undergo a process within the Local Authority that involve public input, Local Authority input and Garda Siochana input – this methodology has a proven track record of being able to take into account the very localised consequences of any changes. Yet this methodology is nowhere in evidence within the plans and it is not clear if An Bord Pleanala will take this into account or how they might go about it if they were even minded to do so. It is my view that this application lends itself perfectly to an oral hearing so that amendments could be made at that level of minute details. “

Conclusion

Please An Bord Pleanala can we as an individual family and one of the over 2000 folk who took part in the local public meetings with our elected representatives urge you to make the many microscopic and the larger changes to this route that will take into account the needs of the local residents. Moderating the scheme would lead to improvements that would be broadly accepted. The public are supportive of improved public transport and cycling. Changes such as changing the times of the bus gates and removal of Sundays from all restrictions would be of great assistance in getting local support and this one change alone would have the effect of supporting less traffic diversions, less rat run trips and significant traffic flows.

We plead with you to either send the NTA/Bus Connects back to the drawing board for alternatives and proper environmental impacts, for complete cycling infrastructure and for quality of life or make the detailed changes that are needed to make this viable.

We also remind you that you are obliged to give an explanation for your decision making – a broad acceptance without detailed explanations of your reasoning for acceptance or rejection of the entirety or the individual elements of the scheme will not be acceptable – in actual fact the only way to do this justice is to hold an oral hearing.

Oral Hearing

The Bord needs to take into account all of the considerations for every signal decision along the way – some may be good and positive and others so obviously meriting rejection. Like many others we do not believe that the information supplied by the NTA is adequate for informed decision making. Like many other residents of the area affected, we believe there should be an oral hearing on this route and I am asking for one to take place.