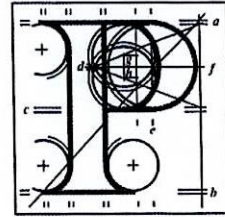


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Ursula Budd & Michael McArdle
22 Rathgar Ave
Rathgar
Dublin 6

Date: 15 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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22 Rathgar Ave
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Dublin 6

An Bord Pleanála (Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1,
D01 V902

30 July 2023

Submission re Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

To An Bord Pleanála Board,

As residents of Rathgar Village, we take great pride in Rathgar's heritage and its many historic buildings and architectural features. The streetscape and public realm of the Rathgar area are a quintessential part of its makeup. It is a historic urban village and an important part of the fabric of Dublin and its special character.

The proposed bus corridor would cut through Rathgar and have very significant negative impacts for Rathgar Village and all of the surrounding roads and indeed many other urban villages and roads in South West Dublin. The claimed gains to the overall average speed of buses are too small to justify the burden being placed on Rathgar and the surrounding area. Residents, pedestrians, communities and businesses appear to have been side lined as an inconvenient afterthought in the proposals.

We **fully support** improvements to Dublin's pedestrian facilities, bicycle lanes and public transport network, to place **pedestrians, cyclists, buses and then cars in that order of priority** on our streets. However, we also believe that Dublin's environment, heritage and community should not be compromised by the introduction of the bus corridor proposed by BusConnects. In its current form, it promises to save commuters mere seconds off journey times.

The proposed BusConnects design is based on outdated road widening principles and indeed outdated traffic count data which was collected in November 2019 and February 2020. This data is no longer indicative of the traffic flows in and around Rathgar. CSO statistics reveal the change in commuter traffic and in the continuation of working from home patterns by so many workers.

Road-widening, which threatens the architectural layout of our streets and will require the felling of mature trees (some centuries old), is strongly opposed by us. Traffic modelling is essential prior to any major road infrastructure project. If the NTA does not have access to the technical capability to model all 12 corridors across the wider Dublin area and has not performed this task, then planning permission should not be granted. The data has simply not been collated. The plans are based on outdated traffic count data, fragmented and disjointed modelling, and a wholly inadequate EIA. Smaller streets and roads will suffer as a result of increased traffic flows and parking issues with many villages across Dublin at risk of losing their identity;

Terenure Road East, Rathgar Village and Rathgar Road are not bus corridors. They form a residential area with schools, hospitals, places of worship, shops and a vibrant community. Spanning out from these roads are a myriad of smaller roads and streets which have their normal ebb and flow. BusConnects' plans propose a total change in the dynamic of these roads, in particular Highfield Road which will now see an increase of traffic and the introduction of a new Orbital bus route. Many other side streets in our area will suffer devastating knock on effects including increased traffic, increased emissions due to congestion, one way systems and parking issues, yet the NTA has refused to trial the proposed traffic changes.

In 2019, in publicly available material, the NTA admitted that the bus network was a short term solution which could not deal with the real issues, so why undermine established communities and permanently destroy the Georgian and Victorian heritage of niche urban villages?

As a short-term solution there are many changes that could be made to make the current bus system more efficient at no cost to communities and villages. These include policies aimed at reducing private cars on our roads (a published goal of the NTA) ; for example, implementing congestion charges and comprehensive park and ride facilities. Contactless payment has not been introduced despite being in use in neighbouring jurisdictions. Priority bus lights could be used. The introduction of school buses would also make a vast improvement to the lives of both families and residents across Dublin.

The NTA seems to be making no actual effort to take cars out of the system in South West Dublin nor is it encouraging commuting traffic to swap to bus services as they enter Dublin City. Both would ease congestion on our streets and improve South West Dublin's air quality without requiring infrastructural changes.

We urge that all non-invasive improvements be made before any irreversible and detrimental changes are made to our villages, streets and the environment of Dublin and the Greater Dublin Area.

We also believe that any proposed measures should be trialled before planning is granted to fully ascertain the impact of the BusConnects' proposals, particularly as traffic modelling has been performed in a piecemeal fashion. The traffic implications of all 12 corridors running concurrently have not been modelled let alone trialled in real time.

The true cost of the environmental fallout of traffic and congestion cannot be understood until traffic modelling for the entire Busconnects project is performed. Therefore, the Environmental Impact Assessment (EIA) submitted by the NTA for this corridor is fundamentally flawed and is not fit for purpose as it does not take into account the fall-out of other bus corridors in the area for example the Kimmage to the City Centre Corridor etc.

Given that the NTA has not proposed any new park and ride facilities for this bus route - surprising in view of the fact that the NTA's own stated aim is that BusConnects is intended to make it more difficult to drive a car in Dublin - an inevitable impact of this proposed corridor (with the traffic changes) is that there will be **more** not less **car traffic**; it will simply be rerouted. The NTA proposal offers no alternative parking solutions for commuters. Therefore, they will be forced to make enormously circuitous routes to the city centre thereby increasing emissions, and causing further negative environmental and congestion impacts. The traffic implications for

residents and commuters alike have not been modelled; we fear that that is a deliberate omission in the data as it would reveal the chaos that will ensue.

RRA submits that the current plans overburden Rathgar village and surrounding roads with an increase of bus frequency which will be detrimental to the liveability of our village and area. The NTA's insistence on routing all buses from Templeogue/Tallaght and Rathfarnham through Rathgar Village puts a disproportionate burden on Rathgar (and on Rathmines). These bus routes could have easily been separated with a bus service interconnection in Terenure Village and separate bus services along Terenure Road East (towards Rathgar) and, alternatively, along Terenure Road North and Harolds Cross Road. Indeed, the interconnection of bus services lies at the centre of the BusConnects ethos so it is very difficult to understand the proposal to route all those buses along one route only (through Rathgar). Moreover, it should be noted that all NTA BusConnects infrastructure public consultations separated the Tallaght/Templeogue to Terenure Village and Rathfarnham to City Centre corridors into two distinct separate consultations and are only now joining both corridors together for the ABP planning process. Forcing all buses through Rathgar has the direct impact of overwhelming Rathgar village and community. The route had previously been designated as a cycle route, but that too has been reversed by the BusConnects proposals.

The NTA proposals will also lead to an inadequate public transport service for Harolds Cross Road which is experiencing a huge growth in housing and education facilities.

A major flaw in the BusConnects' plan for this corridor is that the N81 and R137 have been inexplicably bypassed. For years, the Rathfarnham to City Centre Quality Bus Corridor (QBC) has used the Harolds Cross Road as its route into the city centre. The R137 was identified as a QBC because it is a shorter, more direct, unconvoluted, and wider route to the city centre. Instead, BusConnects plans to have buses turning down the mainly residential Terenure Road East. Signage in Terenure currently directs incoming city traffic via Harolds Cross Road. The NTA's decision to totally discount the Harolds Cross Road has the effect of leaving a large wedge of the city underserved by public transport while overburdening Rathgar and Rathmines, the latter which is already serviced by the Luas (at Beechwood and Charlemont).

The fact that the Harolds Cross Road was excluded at the earliest stages of this current BusConnects project and never fully assessed and analysed is a fundamental flaw of this project. During public consultations with the NTA, the above flawed analysis was highlighted to the NTA. An alternative routing of this proposed corridor via Harolds Cross Road was proposed, but the submission was dismissed by the NTA with a few paragraphs of generic text in the submission analysis. Failure to consider the Harolds Cross Road comprehensively – in circumstances where it was originally identified by the same agency for BRT – wholly undermines this planning application. A full rescoping feasibility study and option assessment, including population growth and access to bus services, is required. A refusal to acknowledge the flawed exclusion of what is a major traffic route from consideration when selecting routes leaves huge gaps in the credibility and soundness of this planning application.

Overall, we submit that the price is too high for so little gain: heritage, trees and wildlife are threatened across Dublin. Key concerns for the Rathgar area include the impact on environment including increased emissions, noise and loss of irreplaceable specimen trees, Compulsory Purchase Orders on Terenure Road East (and further afield on Rathfarnham Road), traffic implications on all local streets and roads, the negative impact on the public realm and streetscape, the bus gate at St Mary's College in Rathmines, one way traffic, right/left turn bans and the impact on the businesses in Rathgar during construction phase and due to loss of parking in the village and in the area. The RRA is also **enormously concerned** about the

proposed reduced width of footpaths in the Rathgar which are already narrow and also question the overall safety of the proposed cycle paths – both of which should take priority over buses and cars.

In summary the application is not fully thought through and will in fact lead to more cars on the road and a very negative outcome for many people.

We appreciate you taking the time to read this.

Yours faithfully

URSULA BUDD/MICHAEL MCARDLE