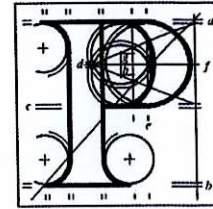


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

David Byrne
151 Greenlea Road
Terenure
Dublin 6W
D6WAE73

Date: 16 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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151 Greenlea Road
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Ref: Application 316272 Templeogue/ Rathfarnham to City Centre Bus Connects

Unfortunately the area of the application is too long in length and in detailed due to the large area of South Dublin that it covers to be able to cover in a submission. I have below covered several sections of the submission that I believe there are issues with and require further consultation and revision with locals, businesses and Co Councils. I have tried to cover each section under its own heading below, many sections though have a knock-on effect to another section as well as does the Kimmage Bus Connects which unfortunately is not included as part of this submission. Failure to have both a combined traffic management plan, environmental plan etc fails to give detail on the affects each corridor will have on each other, especially Fortfield, Greenlea, Lavarna, Lwr Fortfield Road and Terenure Road West.

While a better transport system is needed in Dublin I believe that this current Bus Connects design does not achieve a faster and larger capacity transport system that we require for the further growth of the city and will cause more pinch points and traffic congestion across the South City. Local side roads are being turned into main roads which they were never designed and will have the effect of causing more harm than good, reducing peoples overall quality of life and access to local village centres, schools and parks.

The NTAs own document shows that there will be little time saved on journeys and also some areas will have a reduced capacity than they currently have, for a proposed upheaval of the transport system in South Dublin, the lack of major increase in capacity and faster journey times questions why they are forcing this through.

As more development like the LRD and SHD developments of the Grange Road, in Knocklyon, Firhouse, Tallaght etc are built and completed the buses will be completely at capacity before they reach Terenure, Templeogue or Rathgar. This is a current issue that we have on the Templeogue Road corridor, with many buses not stopping at the junction of Fortfield road to collect passengers as they are already full. In 2022, Mr Justice Holland, refused planning in South County Dublin, Record No. 2020/816JR, because of "the failure to take into account a relevant consideration as to the capacity of the public transport network". Anyone who regularly uses Dublin Bus is aware that they do not have drivers currently to cover existing routes let alone increase capacity in the city and that quite often "Ghost" buses never arrive to collect passengers. Every single Bus in Dublin has ads looking for Drivers to try and fill the current vacant roles.

Overall I believe that the area would be better served by a Metro and Light Rail system, including the extension of the Red Line from Tallaght to the Spawell, Knocklyon or Templeogue Village this reducing the burden of those living in the suburbs having to access the city centre via Templeogue, Terenure, Rathmines. This would allow greater capacity and faster transport times than the bus alone.

Public Consultations

Large parts of the Public consultations were carried out during the Covid pandemic. This was not a satisfactory timeframe due to the inability of groups over several years to meet up and discuss local issues. I believe that once the Covid Pandemic restrictions were reduced the NTA should have had to hold new Public consultations and put forward representatives to explain what was happening and listen to the issues raised by locals. There have been meetings held by local councillors and resident associations to try and explain what exactly the Bus Connect is and how it will affect people's lives in the area. It should not have been up to locals to explain this, this is not their job or expertise. One such meeting held in Terenure turned away easily over 200 people.

Bus Gate on Templeogue Road

Templeogue Road is a major artery for traffic from the suburbs of Dublin to the city centre. From the NTAs survey approximately 7500 vehicles use this road each day. The Bus Gate on Templeogue Road currently works well. When the Bus Gate is in operation it allows the section from the Bus Gate below Lakelands Park to Terenure Village to be partially empty, allowing the Bus to skip by traffic and move through Terenure Village faster.

The implementation of the Bus Gate in its proposed form will close the Templeogue Road to traffic and the large amount of cars, vans and trucks that use this road daily. These vehicles will have to find alternative routes to the Terenure Village and further on to the city centre. The proposal for the Bus Gate will provide a **very limited** time saving for the Bus but will cause a large amount of traffic gridlock in the surrounding area.

The alternative routes that this traffic is proposed to go down is Springfield Road, Templeville Road (and around to KCR) and Fortfield Road and their smaller side roads, including Greenlea Road, Lavarna and Wainsfort. These smaller roads are not designed from the large amounts of traffic that will be forced onto them and many of them are already struggling with the current volumes of traffic. (I will cover these issues under their own headings)

An alternative option would be to move the signal that activates the Bus Gate further back up Templeogue Road giving a further delay to the traffic held at the Bus Gate allowing a larger section of the lower Templeogue Road to be clear, this option would allow the Bus to move through the village quicker.

Terenure Cross Roads

Right Turn from Rathfarnham Road to Terenure Road East

The reintroduction of the Right Turn from Rathfarnham Road to Terenure Road East will already add pressure to an unsafe junction as well as

- putting traffic more pressure on Terenure Road East which also has a primary school, St Josephs BNS and St Josephs church a short distance from the junction.
- making the traffic crossing more dangerous for pedestrians as well as school children using the many primary and secondary schools in the area

- an additional sequence of lights will also

- backup Terenure Place which will in affect cause further traffic delays to Terenure Road West as well as Templeogue Road-

- backup Terenure Road East adding to delays in the Buses exiting town from Rathgar

Turn from Rathfarnham Road to Terenure Place

The removal of the Left Turn filter (as shown on 08.-Traffic-Signs-Road-Marking.pdf – Page 9) will cause a major issue for large vehicles including Vans and trucks turning into Terenure Place from Rathfarhamn Road. This turn is already an issue as traffic regularly has wait for Terenure Place to partially clear to swing over the line to get the turn, up to Templeogue Road / Terenure Road West junction .

Bus Stop outside Terenure College

I believe that the current location of the Bus stop is the best location as it severs both local schools ,Terenure College and Our Ladys as well as the local surrounding residents . The NTA should contact Terenure College to purchase a small section of land behind the current Bus stop which would allow a deeper footpath to be built **and** a bus shelter to be built. This would provide cover for people using the Bus but also safer passage for pedestrins on the footpath.Terenure College has recently looked to sell land (College pitches at Fortfield Road) so if approached could be open to this option.

The proposed new location of the Bus stop is also prone to flooding even during light rain events as well as being located on a section or narrow footpath. This is not a safe location for local school children or users of the bus to have to wait.

Fortfield Road

If the Bus Gate is the implemented in its current proposed plan a large amount of traffic will be diverted down Fortfield Road and onto its subsequent side roads (like Greenlea Road and Lavarna). Fortfield Road is a boundary between Dublin City Council and South Dublin Co Co.

- Is used by a large amount children accessing local schools including Terenure College, Our Ladys, St Pius BNS and St Pius GNS, Presentation Terenure. Due to the large volume of children accessing the school there are numerus Crossing Guards deployed to help children access the schools safely. Due to the volume of traffic on this and the surrounding road currently it is difficult for the Traffic Wardens to safely stop traffic to allow children to cross. With the possible addition of several hundred cars an hour, especially at school times this will create further danger for children and the Crossing Guards to ensure the safety of Children accessing schools.
- Forfield Road is also poorly maintained due to falling between both County Councils. The road needs sever maintenance work caried out as there are large sections of the road the regularly collapse, especially on the section between Templeogue Road and Greenlea Road, which are in poor condition and are patched. This can be seen by talking a short walk down the road to see the numerous potholes, patched sections and collapsed sections of road. The Road surface and pathways are also in poor condition and has needed to be resurface and replaced for a long time.

- The junction with College Drive is also prone to flooding, this has been an ongoing issue every year, not just in winter. The area has many underground streams and rivers and is adjacent to a local flood plane (Terenure College lands) and this causes traffic chaos when the weather is bad.
- There is a lack of a safe Cycle route on this road, with all the potential additional traffic it will become more dangers for cyclists, especially during school hours. Cyclists, including school children accessing the local schools mentioned above, have to deal with the poor road conditions as well as traffic jams at each end of the road and around the schools and speeding vehicles, including busses, on the central section of the road. Designated cycle lanes should have been included in the Bus Connects plan for Fortfield Road in the interest of safety.
- The road well as numerous creches, medical facilities and Churchs located in the area. The area has a more senior population and safe access to local facilities like medical and places of porayer must be taken into account with safe Road Crossings, reduction of speed etc
- The safety issues with the turn from Fortfield Road to Greenlea Road will be covered under the Greenlea Road heading
- Fortfield Road also has a parking issue as large numbers of cars park on the road, especially when games are on in Terenure College or to access Bushy Park. This will only get worse if the Bus Gate is implemented and people do not have access to Rathdown. There are times when the 54a has issues navigating the parked cars.
- There is a major issue with trucks and how they will be diverted which hasn't been addressed. Over 400 trucks use the Templeogue Road daily and even if a small amount of these are diverted onto Fortfield Road to try and access Terenure Village via Greenlea, Lavarna or even Lwr Fortfield Road onto KCR and then to Terenure Road West is going to be a major issue and needs to be addressed before a change to the Bus Gate can be implemented.

In the Appendix there are pictures of some of the traffic issues on Fortfield Road, overall I fell that there has not been enough planning and consultation been put in place for Fortfield Road and the surrounding roads like Greenlea, Wainsfort and Lavarna.

Right Turn ban and Traffic on Greenlea Road and Lavarna

If the Bus Gate is implementation on Templeogue Road as mentioned about traffic will flow into Fortfield Road and onto Greenlea Road and Lavarna. The NTA must have further discussions with locals to let them voice their concerns and the issues that they have, there have been several debates on traffic in the area and is a regular issue with local residents, everything from Right Turn Bans, to implementing a 1 way section on the road at Greenlea Grove. Greenlea Road is a long road and has several issues and bottle necks on it as it is not designed for the volume of traffic currently using it, let alone what could potentially end up using it.

- I believe that the right Turn ban must be implemented, either it be timed ban, e.g. 7am -10am or 7am – 7pm or “No right Turn except access” if the Bus Gate gets the go ahead..

This may cause an annoyance or inconvenience for residence on side roads off Greenlea Road, but Greenlea Road is already struggling with the current volume of cars rat running down the road to get to Terenure Village. I do not believe a “wait and

see what happens" approach is a good idea. We could have several years of traffic mayhem before anything is done to fix it, reducing the quality of life and the safety of people living and using the facilities on the road.

Due to the extent of "No Right turn" bans etc that will be implemented across the whole Bus Connects corridor it is not possible for the Garda to be able to monitor and enforce these. This has lead some people to believe that there is no point in having these bans but I think that the NTA and local Councils should have to look at investing in camera technology, like used in the UK to enforce the traffic restrictions. Below are links to articles of technology used in 2 cities in the UK to great effect.

<https://www.express.co.uk/life-style/cars/911189/no-right-turn-fine-council-sign-banned-traffic-light>

<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/city-centre-no-right-turn-19335601>

- Cars travelling at High speed and cutting the corner is also an issue on Greenlea Road as they Rat Run through the area, this will only get worse if the Bus Gate is implemented. The cars cut the corner from Fortfield Road onto Greenlea and race towards Terenure Village to try and skip the traffic. The same issue happens with Lavarna as the try to get through KCR towards Sundrive and Harolds Cross.
 - o For a resident is its near impossible to get out of your drive way due to cars speeding and driving dangerously, bad parking (discussed later) and due to the sheer volume of cars driving down the road.
 - o Lavarnas situstion will also become worse as traffic on Lwr Fortfied Road to Wainsfort will become more increasingly backed up more people will turn to Lavarna as a rat run.
 - o There are several speed ramps on the road, I have spoken to several residents at the top of the road and we have asked about a concrete island and an additional speed bump to try and slow the traffic down. The current Council plan seems to be wait and see what happens with Bus Connects. The Fortfield Road end of Greenlea contains Scouts Den, Medical facilities, shop, post office and local businesses like Music and dance clubs and has a large amount of traffic that uses and stops at this section. In the appendix are pictures for Orwell Shopping Centre and of some residents would like to see implemented to make the area safer.
 - o There have been several accidents over the years at this junction which will only become worse with more traffic.
- Parking is also and issue in the area,
 - o The Fortfield Road end of Greenlea Road is regularly blocked with cars trying to navigate the road, cars and vans also park on the footpaths and block driveways on a daily basis.

The middle section of Greenlea Road and the junction with Greenlea Grove also has a serious issue with traffic on Match days due to the poor access Terenure Rugby Club. This section of road can be blocked due to bad parking and the parking of

Busses on the road as they cannot access the Rugby Club. This issue needs to be taken into account

- Again Greenlea and Lavarna will have a major issue if Trucks and Vans try to use it to access Terenure Village. The road simply isn't designed for larger vehicle use.

Bushy Park and Rathdown

With the Bus Gate and the "No Right turn" ban into Rathdown, access to Bushy park will be cut off to local residents especially the elderly. For any clubs and schools using the playing pitches there will be a substantial increase in journey times as they will only have access via Rathfarnham Road, through Rathdown. The knock on effect will also be further pressure on Fortfield Road for parking. The "No Right turn" bans for Rathdown needs to be reviewed.

Terenure Road West

Terenure Road West currently struggles with the traffic volumes that use the road. Even at the weekends and off peak times the road can be backed up. This road is now sandwiched between the Templeogue Bus Connects Route and the Kimmage Bus Connect Route (as is the stretch between Lwr Fortfield Road to KCR) but is vaguely mentioned as it falls between both yet is a main artery for alternative traffic due to both potentially being implemented.

- Traffic is a serious issue as on this road. During school term this road is backed up from Terenure Place to Parkmore (over half way up this road). It takes at least 20 mins to get from from Greenlea Road junction to Terenure Place currently. As traffic will be diverted from Templeogue Road, this is the alternative route through Terenure Village (access via Fortfield Road down through Greenlea etc)
- A larger number of commercial vehicles will make this road more unsafe than it currently is especially around Presentation School
- Terenure Garda Station is at the Terenure Place end of the road, access to and from the Garda station is an issue due to traffic a matter which will only become worse for the Garda and people accessing the station.

Lwr Fortfield Road (R817) and KCR

The Lwr Fortfield Road to KCR junction is another issue that needs to be looked at on several grounds. This section for road and junction falls between both Busconnect routes.

- Traffic
 - o This road suffers constantly being blocked up by traffic which will only be made worse by both Bus Connect projects.
 - o Traffic from the Bus Gate on Templeogue Road will now be diverted to KCR to access Terenure Village via Terenure Road West.
- Again a safe cycle lane that is segregated from traffic is not included in this section of road, with the volumes of traffic currently its hard for cyclists to safely navigate this section of road

No segregated right hand turn from KCR to Terenure Road West

- This section of road and junction is narrow and poorly layout due to its location, Petrol station access and island design and location.

- If an artic or large truck wishes to turn right it will back up traffic and will dangerously block the whole junction as it attempts to turn onto Templeogue Road
- I do not believe that the proposed junction layout is safe for large trucks to turn and that "swept path analysis for trucks turning" must be considered before either Bus Connects project can go ahead. A large artic will more than likely have to mount the path to get an adequate turn circle for its trailer. I also believe that this will be an issue in Rathmines from Rathmines Road to Castlewood Avenue and Rathmines Road to Richmond Hill and Mount Pleasant Avenue.

Junction of Templeogue Road, Templeville Road and Springfield Avenue

An example of how more revision and planning needs to be put in to the Bus Connects project is at the Junction of Templeogue Road, Templeville Road and Springfield Avenue, from map **08.-Traffic-Signs-Road-Marking.pdf (page 36 of 45)** there is no separate Right hand lane or Turn light for Traffic turning onto Springfield Road from Templeogue Road. This will cause large delays and back traffic into Templeogue Village especially when commercial vehicles like trucks and articulated lorries are planning to turn right onto Springfield Road. The consequences of this will be to backup the traffic into Templeogue Village which will also block the Bus getting through the village and delay it on its route. The same can be seen in several junction designs across the documentation like KCR which is only a short distance away.

There are many other issues which unfortunately I cannot cover in details but Im sure will be included in the many submissions that you will receive from Resident Associations and individuals across South Dublin.

- Increased air pollution caused by the unnecessary traffic congestion reducing the quality of life for people affected
- By not putting both Bus Connects together or referencing each other and treating them as separate entities the true effects are not been shown and explained to locals.
- The further removal of Trees and green space in Rathfarnham Castle which is slowly being destroyed by the continuing development on its land.
- Poorly planned cycle lane at the back of Rathfarnham village, cyclists will not use it as it will add extra time to their journey, they will continue from Rathfarnham straight down Rathfarnham Hill to Terenure.
- The removal of more Greenspace along the route, where we should be increasing Green space, trees and quiet zone areas the Bus Connects project is having the exact opposite, as in Terenure Village for example its increasing the traffic burden on the village.
- Forcing traffic from Rathmines into Castlewood Avenue and Mount Pleasant where they are not designed for current volumes and are not wide enough for commercial vehicles
- Making outbound traffic from Rathmines head to Rathgar via Rathmines Road Upper with the reinstatement of the dangerous right turn onto Highfield Road, again a road not designed to large volumes of traffic.

- The lack for planning on how deliveries are to be carried out and the safe across the whole section of Bus Connects including safe turning space for trucks and artics, especially at junctions.
- As I have mention in the KCR heading I also believe that this will be an issue in Rathmines from Rathmines Road to Castlewood Avenue and Rathmines Road to Richmond Hill and Mount Pleasant Avenue for both large vehicles and trucks. The junctions are not designed for large vehicles turning and have been narrowed in recent years. Mount Pleasant struggles with large cars let alone trucks or vans and I believe that if a truck / van has to turn onto Richmond Hill onto Mount Pleasant because of the Bus Gate in Rathmines there is a potential for a serios accident.

Appendix

Traffic parking on and congestion on Fortfield Road

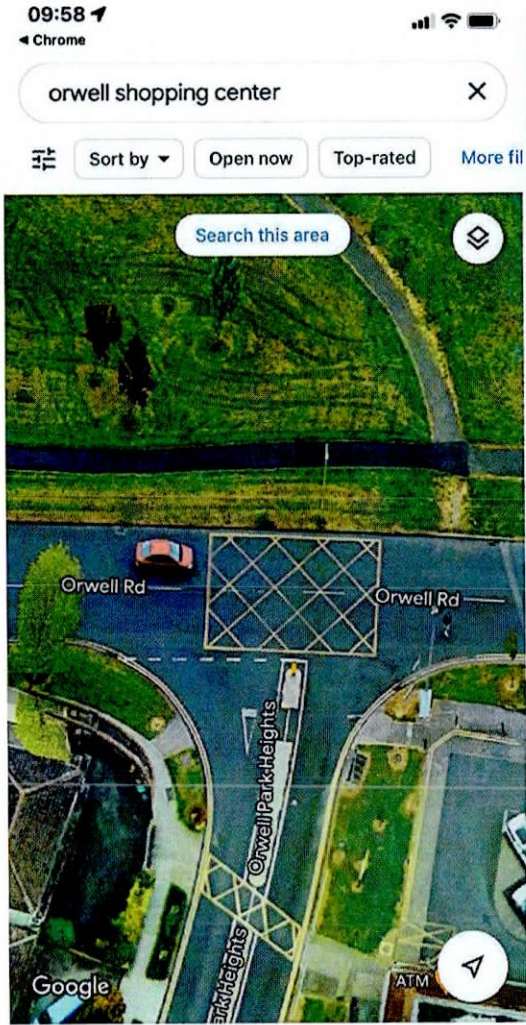




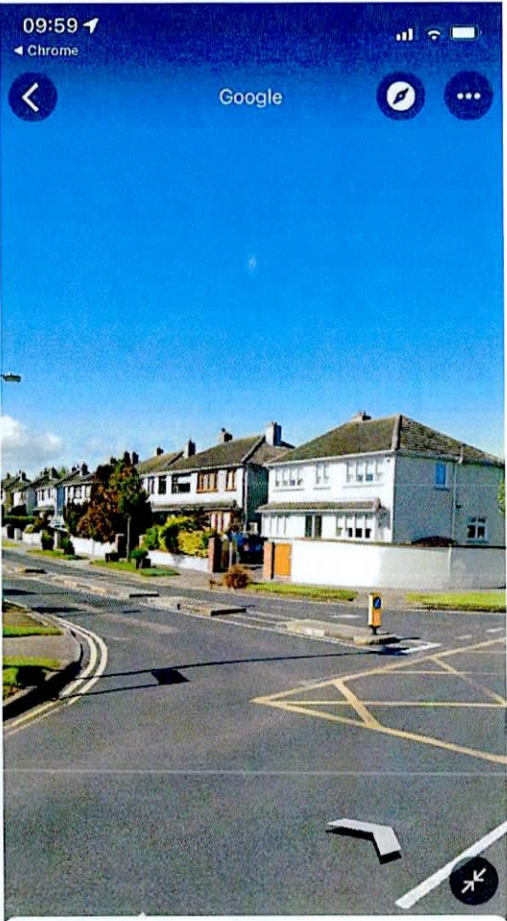




Safe Crossing Islands at Orwell Shopping Centre Templeogue



SHOW LIST



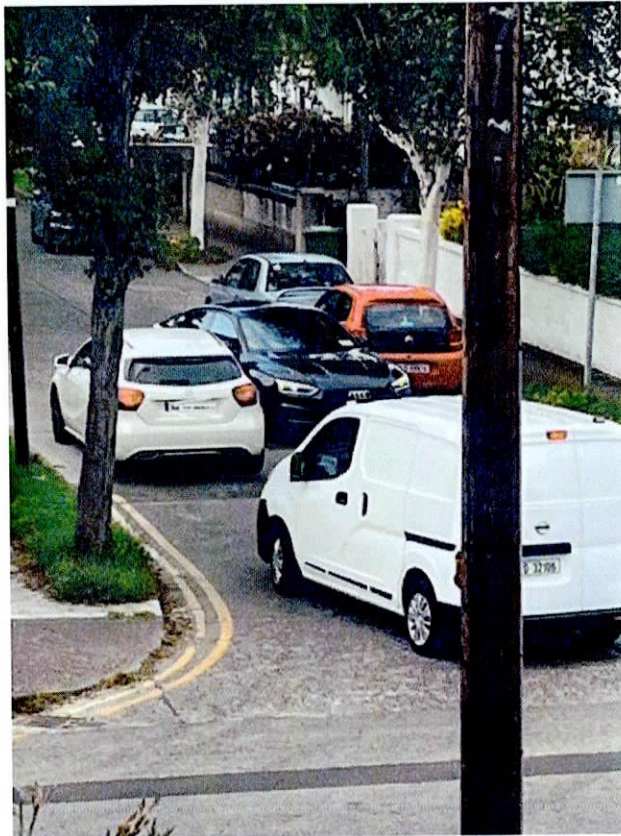
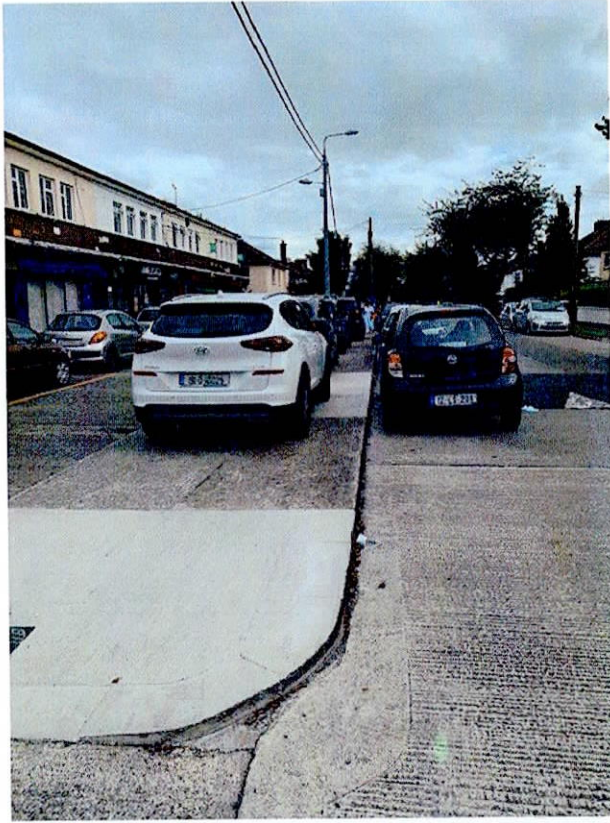
Orwell Rd

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Nearby photos

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Parking Issues on Greenlea Road blocking footpaths and roads.



The White and Red cars above are parked and the black car is trying to squeeze through the remaining gap

Due to the narrowness of Greenlea Road once a truck enters, no cars can pass as shown from recent road works, this photo is just after 7am.

