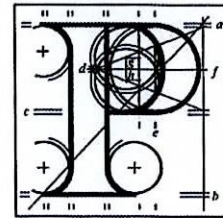


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Emmanuel Kehoe and Dr Attracta Halpin
5 Fortfield Drive
Terenure
Dublin 6W

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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Observations on BusConnects in relation to its impact on the Tallaght, Templeogue, Fortfield and Terenure areas of Dublin

By Emmanuel Kehoe and Dr Attracta Halpin, 5 Fortfield Drive, Terenure Dublin 6w

In principle, we support the BusConnects objective of improving public transport services, reducing dependence on cars and reducing the length of time taken to get into town by bus. However, we have serious concerns about the impact of the plan on our area and on the quality of life of its residents, including ourselves. We also have concerns with aspects of the plan's complexity and the capacity for its delivery in the capital.

A Little History

Jarrett Walker + Associates was hired by the National Transport Authority in 2017 to advise on the National Transport Authority plan for Dublin's bus network, BusConnects. This company is based in Portland, Oregon in the United States. While most of its contracts have been with cities in the United States and Canada, it has also worked on transit plans in Auckland, Reykyavik, Moscow and Yekaterinburg.

Like most US cities, Portland is grid-based and was incorporated only in 1851. Dublin, by contrast a city of narrow streets, has grown organically over many centuries with major efforts in the Georgian era by the Wide Streets Commissioners to open up parts of the city, demolishing narrow medieval streets, lanes and habitations.

In 1834 the Dublin and Kingstown Railway delivered the possibility of developing desirable suburbs along the south of Dublin Bay, and later in the Victorian era, the electric tram system made areas north and south of the Liffey amenable to further suburban development, such as Drumcondra and the townships of Rathmines and Rathgar

In an interview with Dublin Live and published on September 25, 2018 (before the Covid pandemic) Jarrett Walker said:

“Dublin is choking on traffic, partly because public transport isn't useful to enough people. It doesn't take people to enough places, quickly enough, so that people can choose not to rely on cars... If people feel that the only path to freedom is their car, traffic will keep Dublin from growing and prospering.”

Sadly, the population of Portland itself is falling - down 3 per cent from the last US census in 2020. According to Zusha Ellinson writing in The Wall Street Journal (June 28, 2023) the city, “which has long had a reputation for being clean, safe and hip, is struggling with serious crime and homelessness”and “open drug use is common”.

How much this has to do with Covid and the movement away from full-time office work in city centres is conjectural but, according to Ellinson, “the downtown also has been affected by commuters' slow return to centralized offices from months of working from home”.

These experiences are common to other US cities just as they are in Dublin. However it appears that the concept of BusConnects and its complex of new routes and major traffic diversions to accommodate the plan may have been substantially set in the pre-pandemic period.

'Efficient public transport': Tallaght to Terenure

Creating public transport efficiency is a two-edged sword, if not a blunt instrument, favouring some and inconveniencing others. For example, passengers living between Templeogue and Terenure (a distance of just two kilometres) will board a bus only to be asked to leave it at a Terenure "interchange" and will have to cross a busy road to queue for another to take them into the city. What will happen to passengers, many of them elderly, crowding the narrow pavements of Terenure should that connecting bus be full and the weather foul?

How is this an improvement on the present situation? As things stand, passengers have a choice of three bus routes - each of which will take them to the city centre in a single journey, with a single fare transaction.

The major restrictions BusConnects proposes to impose on vehicles other than buses and bicycles will inevitably change the character of this area. It can be expected to cause serious traffic congestion in Terenure and specifically on Fortfield Road, Terenure Road West and intervening roads, as also on Rathdown and Rathfarnham Road. Smaller linking roads in the area will also be adversely affected. What steps are envisaged to lessen the traffic congestion in this area that BusConnects will assuredly create?

The objective of persuading people to switch from cars to public transport does not take account of the realities of life for many people living in this area. If you happen to work or live somewhere close to the stops on the route it makes sense to take the bus, as we do regularly. However, if your workplace is at any significant distance from the bus route, and you are under time pressure in the morning and have to leave children to school or creche first, the car is the only viable option.

The proposed no right and no left turns affecting Templeogue Road, and the inbound bus gate at Olney will mean huge inconvenience and very circuitous and congested routes for people forced to drive to work from the Fortfield area .

The traffic proposals will create difficulties for

- staff and students attending schools in the area and for whom bus travel or cycling are not an option
- residents wishing to shop in local supermarkets or to access other businesses in Terenure
- people in the catchment area wishing to use Bushy Park for leisure or sporting activities.

Fortfield Road and Templeogue Road have entrances to (and of course exits from) two large secondary schools, Terenure College and Our Lady's School. At the top of Fortfield Park and close to Templeville Road, St Pius X Boys National School and St Pius X Girls National School share the same site. The area is crowded with cars dropping children to school Monday to Friday. The 54a bus runs past St Pius X schools, school buses ferry children to and from the national schools and, frequently, bin lorries are added to the difficult traffic mix.

Fewer Bus stops

The 'consolidation' of bus stops, a feature of the BusConnects project, can be seen purely as a device achieve a reduction in journey times. Fewer stops at greater intervals will achieve that effect at the expense of those people – among them elderly, wheelchair-bound and mobility-impaired travellers - who will be forced to cover longer distances to catch a bus, and may therefore not experience much reduction in the overall time taken to reach their destinations.

In its blindingly obvious rationale for this strategy the **National Transport Authority Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme. Bus Stop Review** (issued January 6, 2023) states that "In general, the lower the distances between stops along a corridor, the higher the delay that is incurred for buses ...with some estimates suggesting that stopping at bus stops makes up in excess of 20% of the journey times along the QBC corridors. International literature on bus stop spacing recommends a distance of 300 to 500m."

Later in the same document it quotes the DfT (British Department for Transport) document **Inclusive Mobility** (2005) recommending "distance limits without rest for various Mobility Impaired Groups that ranges from 50 to 150m, which limits the distance between interchanging bus stops significantly. It is therefore recommended that the distance between the key interchange bus stops [as in Terenure - see above] is limited to approximately 100m walking distance where possible to enable all impaired groups to be able to interchange, consideration must be given to providing a rest spots at approximately 50m between the bus stops to cater for those that will not make this distance without a rest." Happily the humane NTA has struck a blow for these groups by plumping for 400 metres between suburban stops and 250 metres between stops within the city centre.

Creating a 'non-place':

The slogan 'We are a Community, not a Corridor' emerged early on when residents realised with alarm what the perhaps overly-ambitious BusConnects programme would actually mean for the areas in which they lived.

Trees would be cut down, parts of gardens would be subject to compulsory purchase, and road space for private cars would be reduced (or 'shared') in favour of "active travel" for those who want to ride bicycles, or use e-scooters as yet not legislated for. Again this form of social engineering – some might call it compulsion - involves vast expenditure and could even be said to be discriminatory against older people. Transport minister Eamon Ryan's

department said in March of last year that the Dublin BusConnects programme alone will devour between €2.6 billion and €3.3 billion over the next seven years.

“Communities not corridors” calls to mind the late French anthropologist Marc Augé’s theory of non-places as “spaces of circulation, communication and consumption, where solitudes co-exist without creating any social bond or even a social emotion”.

His non-places are characterised by a detachment between the individual and those areas through which they merely pass. This contrasts with the familiar and meaningful nature of places for those who live there: “a space where identities, relationships and a story can be made out”.

How is this to be avoided when, to create the Tallaght-Terenure spine, large numbers of cars and other vehicles are to be diverted along Fortfield Road to the T-Junction at Wainsfort Road, thence to the complex KCR junction and down through an already crowded Harold’s Cross into the city? Has anyone seriously examined the consequences of this chage? The certitude of traffic jams? The pollution from thousands of idling internal combustion engines, which are still in the majority, though EV ownership is visibly on the increase.

There is also to be no turn from Templeogue Road into Rathdown an area giving access to parking spaces for Bushy Park. Consequently, surrounding roads Fortfield Drive, Fortfield Park etc will become even more crowded with cars whose occupants use the park for recreation.

And the future?

Does the BusConnects plan need to be revisited in the changed working environment post-Covid? Is the plan too complex? Could it end up in a Gordian Knot of buses and irate passengers?

Can the public have confidence that the National Transport Authority has the capacity to oversee this enormous project with all its hugely expensive roadway infrastructure - bus lanes, so-called ‘bus gates’, bus stops, an increased bus fleet (hard to envisage given the current difficulties with driver recruitment) cycle paths, Toucan Crossings, quiet road schemes, wider pavements, and so on?

The NTA’s recent history with electric vehicles for public transport offers little reassurance. Over a year ago it bought 134 all-electric buses for Dublin at a cost to the taxpayer of over €50 million. These buses remain in storage in depots around the city because the NTA failed to get planning permission for the infrastructure to charge them. But take heart; they may be in action by early next year.

The entire BusConnects project seems to be in sympathy with the philosophy fashionable in some quarters that private cars should be removed altogether from the urban and suburban environment, a philosophy based on powerful climate change arguments that may eventually be countered by the increasing growth in privately owned EVs.

A car-free policy is not realistic for Dublin and its sprawling suburbs. For very many citizens the car will continue to be an essential means of transport, enabling them to get to and from work, combining that with caring for their children and dependent relatives.

Dublin is a low-rise, dispersed city, but is it farfetched to suggest a partially underground Dublin Metro as an option? There are many cities, with populations smaller than Dublin's that have underground systems. But the suggestion that this area of Dublin could have the benefit of such a system, or even that the Luas might be extended to serve the those living in this populous area seems to have been pushed aside, shelved and ignored by planners.

Instead we are to have a complex system of bus routes, its success dependent in places on "interchanges" which will call for frequency, timing and carefully judged bus capacity if it is not to become an even greater irritant to passengers than the system it is designed to replace.