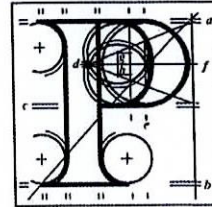


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Fionnuala and Dick Blake
23 Greenmount Road
Terenure
Dublin 6
D06PY11

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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23 Greenmount Road
Terenure
Dublin 6
DO6 PY11

11 August 2023

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

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

Background:

I have lived at my current address in Terenure village for sixty years. For thirty of those years, I have been actively involved in local resident's Associations, and community social, commercial, and charitable activities through which I have full insight and understanding of the local dynamic. I am a member of the Terenure Residents Association and am supportive of the observations made in the TRA submission dated 9 August 2023.

This submission relates solely to the views of myself and family regarding the impact of the overall proposals, and particularly those relating to the Terenure / Rathfarnham to City Centre Bus Corridor Scheme. For specific background detail we reference the TRA application [relevant extracts appended].

We have read and extensively analysed the available NTA proposals, amendments, and communications on this matter. While we are supportive of the principles behind the programme goals and objectives, we are concerned that there are significant elements of the plan where the proposals have not been adequately validated or justified. Limitations on insight into the evaluation processes used, and/or alternative options available limits the scope on which observations or objections can be made.

NTA Overall Approach, and evaluation Processes.

As detailed in the summary below it is apparent that the evaluation / planning processes used by NTA are incomplete, inadequate, or limited in scope. As such, data used to make critical strategic decisions is compromised, out of context, or simply irrelevant. Comprehensive independent due diligence is a fundamental pillar for sound informed decision making. With acknowledged gaps in the quality and time-relevance of the research conducted, the credibility of the NTA proposals is compromised. Accordingly, the achievability of target benefits from programme implementation are wholly unclear. What is more quantifiable and certain is the social, commercial, and environmental impacts of the proposed initiatives on the Terenure community in the near to mid-term. Unlike the NTA evaluation process, local assessments of these impacts are based on a real understanding of day-to-day community behaviours and priorities.

While the NTS's underlying policy objective of "getting people out of their cars" is admirable, investments that rely on altering consumer behaviours are highly complex, challenging, and

inherently risky. Success in capital projects impacting on consumer needs require delivery of highly compelling and sustainable benefits as an alternative to the norm. While the NTA goal of minor time saving on bus journey times can immediately benefit existing bus users, car owners will consider the whole journey experience, particularly the flexibility and control of timelines of car journeys against the time uncertainty the incremental cost of bus fares. Accordingly, the assumptions that underpin this major capital programme are unrealistic and high risk.

A bus corridor proposal based on less extreme and expensive measures is much more likely to achieve NTA goals and a deliver a more workable solution for consumers. This reality should not be ignored.

Of particular and real concern is the fact that the NTA proposal and assumptions are based on traffic data gathered and collated in the pre-COVID era. As we know the Work-from-home [WFH] reality is now established and embedded in urban life. The impacts of this on traffic patterns along the proposed corridor are evident from daily observance. It has never been easier to travel into the city throughout the day than now. While travel volumes during peak morning and evenings travel and evening times will naturally remain higher, the extent of the challenge envisaged pre-Covid has been greatly diminished in scale and alleviated by WFH patterns. The 2019 "problem" has been substantially resolved and possibly at a level greater than envisaged by NTA at the time. On this basis, the extent, scope, and scale of the capital projects envisaged is out of synch with what is necessary and workable.

Objections & Observations Summary:

The proposals for redirecting traffic from the main thoroughfares into link roads will have significant environmental impacts on the areas and quality of life of residents. These negative and harmful impacts are acknowledged but not adequately assessed by NTA. The deficient EIARS needs validation and full consideration in final proposals. [See TRA heading detail on Environmental Impact Assessment Report below].

The GDATS acknowledges quantum increase in commercial traffic through link / residential roads. No detailed analysis of impacts on roads, residents, and commercial interests has been undertaken. The deficient EIARS needs detailed analysis, validation, and full consideration in final proposals.

NTA estimates of time-saving benefits are minor relative to the scale, scope, and extent of the infrastructural changes. The costs associated with the proposals are disproportionate to the time limited benefits. [See TRA Heading detail below on Proportionality].

NTA acknowledges that expected increased commercial traffic by 2040 will require a fundamental revision to the plan. Hence payback on the multi-billion capital programme and cost-benefit are based on a 15-year timeframe. To mitigate risk the inherent risk of delivery relative to the scale of structural impact is grossly disproportionate and should be critically re-evaluated.

The TRA submission below listed aspects of the proposals that merit critical assessment and revision based on proportionality. Specifically.

- Alternatives to CPOs on Rathfarnham Road - Pearse Bridge to Rathdown Park/Rathfarnham Road Junction
- Rathfarnham Road [Bushy park Road to Beechlawn Way]
- Terenure Road East – Bus Gate
- Breach of Building Regulations / CPO and Contravention of Dublin City Development Plan

We are in strong agreement with the points made and the suggestion that alternatives be considered that can achieve underlying goals with less invasive structural changes.

Despite very challenging times for traders in Terenure village there are now high occupancy rates in commercial premises. The addition of new businesses has contributed to a positive environment and attracted new custom to the area. There is now deep concern that the proposed changes will reverse the momentum gained. Hence, we strongly recommend reconsideration of alternatives options in regard to road widening and streetscape in particular.

Yours Sincerely

Fionnuala & Dick Blake

APPENDIX:

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 time 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 Beech lawn 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. 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 which 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.

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.