



John Lahart TD
Dáil Eireann
Dublin 2

Date: 17 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

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Make the Bus More Attractive to Commuters

Attempting to create traffic advantages for buses makes sense – and attempting to create routes where either buses have exclusive and unfettered use or advantage over the private car, also makes sense.

Variations of both the above also make sense.

Attempting to create an environment where cyclists feel safe also makes sense (notably, BusConnects has not really adapted, nor has it shown the agility to deal with the rapidly evolving environment that has seen the introduction and growth in use and public/private provision/ownership of e-scooters and a variety of types of e-bicycles. I fear that we will have to return to this subject, now that scooters are legalized and will begin to populate our cycle lanes, along with bikes and e-bikes. The NTA has demonstrated no agility in dealing with this reality or the real policy and safety challenges it poses to users and the rest of the public, be they pedestrians or drivers).

Prudent Use of Public Funds

Some serious alarm bells over the manner in which public funds were being used and the desktop nature of some of the design proposals, began to sound for me, very early on in the BusConnects project. The NTA is familiar with my views on some of this – but I would like to gesture in the direction of just one proposal, to illustrate, which featured in the early stages of BusConnects by the NTA, which represented, in my view, a loose regard for public funds. I refer to one small, cycling aspect of the Rathfarnham Corridor. I raise it to highlight one, just one, example of over-engineering by the BusConnects Team (who do fine work, in fairness). And there were more examples just on the short route between Rathfarnham Church and Rathfarnham Crossroads. If there were example of over-engineering at this location, clearly ABP ought to be on the look out for more. Perhaps it is deliberate.

An Example of Proposals and Spending of Public Monies

The feature I refer to does not, thankfully feature in the final Busconnects proposals for Rathfarnham to the City Centre.

There was a proposal to divert a cycle track into St. Mary's Terrace in Rathfarnham (a totally counter-intuitive route, directionally, for any city-bound cyclist). This small street is a cul-de-sac, at the end of which the NTA somehow proposed to provide access around the back of a private development; to construct a bridge across the deepest ravine on the Owendoher River (the land adjacent to which is in private ownership) and then to create, as I recall, two other bridges for this part of the scheme only, one bringing cyclists back over to the north side of the same river so that they could use a final newly constructed bridge to cross the River Dodder. I will resist the temptation to outline in detail where this route for cyclist went from there and where it eventually emerged to merge with city-bound traffic).

This doesn't feature in the final NTA submission to ABP because the public and their representatives pointed to the folly of it. But had we not, and had it proceeded to application stage, I honestly could not begin to estimate how much this over-engineered cycleway would have cost, not just to construct, but in terms of CPO's that would have been necessary. It really would have amounted to a spending scandal. There would be no reason for cyclists to use it.

- What was most alarmingly clear, also, is that to a layperson, there was no real evidence that the engineers/designers, had actually physically ever visited the location. One site visit would have been enough to demonstrate that inclusion of this section was pointless and costly.

As a legislator though, and as a regular cyclist, a regular user of buses, LUAS and as a driver and avid pedestrian; as a policymaker who, like the public, yearns for progress in transport in Dublin, this episode truly alarmed me from two perspectives:

1. How much the NTA was prepared to spend on elements of the BusConnects project that were needless and potentially exorbitantly costly, and would have ended up redundant;
2. How out of touch its plans were (in that case) with the reality on the ground, in this case the topography and geography, not to mind potential public sentiment with regard to this proposed cycle route. How impractical it was to even think that cyclists or pedestrians would take a completely counter-intuitive and counter-directional route.

Meeting the Challenges and Change is Difficult

However, at all public consultation meetings, I believe I did attempt to convey to the public the need to address Dublin's chronic traffic congestion; the cost of this ever-increasing congestion; the impact of traffic on our air quality; and the need to devise and develop strategies to deal with this growing issue. Not least because of the impact, and now more than ever, the increasingly *obvious* impact, of climate change.

I was struck by how few younger people attended public meetings but how many of them expressed their support in correspondence to me. I think that perhaps the NTA, and I could be wrong here, might have ventured more productively into Social Media communications in appealing for feedback from the public.

I want to thank the NTA for the many public consultation meetings they held and the manner in which they responded to this consultation in the context of Covid.

I raise these early concerns in order to inform ABP, that its inspectors, if they are to do justice to the planning application and the submissions concerning the application, must pay close attention to the smallest details contained in the NTA proposal and interrogate each accordingly, to reach either a point of satisfaction or disapproval and rejection or amendment.

The Public Recognises Change is Needed

The public, at the meetings I attended, recognize that change is needed and that our city and suburbs simply cannot continue to be gridlocked. They accept and support the idea of improved connectivity and reliable, connected public transport modes.

It would be too easy to suggest that the public just refuses to accept change. I would urge ABP to read the detailed submissions I will refer to and inspectors will see for themselves that many of the concerns are valid and do need to be addressed and are well-founded on a combination of local knowledge and data.

Public Consultation

This represents the final part of the public consultation phase and so I would like An Bord Pleanála (ABP) to take account of the following points that my constituents have requested that I raise on their behalf. In doing so, I wish to acknowledge the significant work that is being done to create cycle routes and active travel routes throughout the four administrative Dublin counties – these do not always meet with public approval, but there is beginning to emerge a network of cycleways.

I am concerned, however, and I will come to this later in my submission, that the Active Travel section of Local Authorities and the NTA are not liaising with the BusConnects section of the NTA when it comes to designing these cycleways. In my own constituency there are clear examples where Active Travel Schemes, funded by the NTA, and being designed and implemented by the local authorities, do not appear at all to take account of the needs of public transport users and operators. More about this later. But this is a consideration ABP must take into account in its deliberations and conclusions.

Community Submissions

A comprehensive list of community groups, individuals and residents' associations, have made very detailed submissions to ABP as part of their response to the planning application by the NTA for the **Templeogue / Rathfarnham to City Centre Bus Corridor**.

The submissions by these organisations have by and large been researched and documented by volunteers, who have expended an enormous amount of time and energy in putting together their observations and concerns. I would highlight the business concerns of those businesses in Terenure Village, which will be severely impacted if the proposals were to proceed as submitted. As a trading area, Terenure lies outside my constituency, but the concerns of businesses there have been brought to my attention.

Dublin South West

In my own constituency, I would like to bring to your attention to the submissions from the following groups. They constitute significant and detailed submissions. They themselves have interrogated NTA facts and figures comprehensively, with a fraction of the human resource. It is important that the Bord pays them due regard.

WORK Resident's Association

WORK Resident's Association represents close to 1000 households in the Templeogue area and has made a detailed submission to the Bord.

WORK residents believe that ABP should not grant permission to the proposals as submitted. WORK outlines twelve observations and develops each of them in their submission.

Some of the figures and statistics provided by NTA with regard to this specific route are challenged in WORK's submission. They also outline how there are three Core Bus Corridors that NTA intends to proceed with but, in the view of WORK, does not factor into their applications to ABP the impact of each corridor on the other, particularly in terms of displacement from one to the other.

Other observations relate to specific impacts, such as the construction of Bus Gates in specific locations; WORK argues that, rather than a reduction in traffic on Wellington Lane, as NTA suggests, that the contrary will occur directly as a consequence of downstream proposals which propose to prevent or restrict traffic from particular areas in Templeogue/Terenure, causing that traffic to look for alternative arteries – the most obvious and earliest being Wellington Lane and Cypress Grove Road, just to illustrate two examples.

WORK also raises the potential for a negative impact on access by the community to community facilities, as a result of changes proposed.

- WORK also suggests that the proposal to operate bus gates between certain hours is not required and makes suggestions in this regard.

There are also very serious concerns expressed not just by WORK but other residents and individuals, which I wish to emphasise as a TD for the area, with regard to creating a fully signalised junction out of the existing Spawell Roundabout and the impact that this will have on all road users, not least the flow of public transport.

Many of the submissions I have received challenge the NTA over its lack of detail with regard to the economic impact on commercial corridors and centres along these proposed corridor routes – that if left unaddressed could have devastating impacts on business in villages. Or perhaps the opposite – but the NTA does not make the case convincingly for traders.

Orwell Park (Templeogue Resident's Association)

In a detailed and comprehensive submission, this association raises a number of issues and concerns. It too has undertaken detailed research and also challenges data provided by the NTA as part of its Core Bus Corridor application.

Orwell Park Residents summarise their concerns as follows:

1. "As the Rathfarnham/Templeogue Application stands, progress of the projected number of buses through Terenure Road East is impossible.
2. As the Application stands, there is a significant risk that the progress of the projected number of passengers and buses through the city centre is impossible.
3. The Applicant has failed to properly examine the leading alternative proposal, i.e. the continuation of *MetroLink* from St Stephens Green to South West Dublin. This would fundamentally alter the functionality and routing of buses throughout South West Dublin. It would also inform decisions now about "Do we really need to spend enormous sums of money on extravagant construction and land-take for an ineffective outcome, knowing that metro will enable capacity and speed issues to be resolved?"
4. The forecast cost of *BusConnects* is comparable to the cost of continuing *MetroLink* to South West Dublin as estimated by NTA/Jacobs – despite the latter project having been given a 'risk and optimism' uplift to its cost estimate much greater than *BusConnects*.

Supply of critical information

5. In order to evaluate the Templeogue/Rathfarnham Application, An Bord Pleanála should require the Applicant to provide critical information to include the following:
 - How many buses are forecast in the peak hour on each corridor?
 - Explain how these buses will be able to proceed through the city centre and set out the measures that will be required.
 - Explain how these buses will be able to proceed through Terenure Road East and set out the measures that will be required.
 - What will be the impact of these measures be?"

I support the fact that alternatives have not been considered by the NTA, such as the Metro South West. However, even if that alternative is considered, I do believe that all residents accept that interim measures in terms of public transport would also be needed, i.e. between

now and Metro. I can also see some merit in providing dedicated, exclusive corridors for buses as a possible precursor to a light rail alternative, HOWEVER, this justification is not offered by the NTA, as a possible rationale for Core Bus Corridors – i.e. that they may in time become 'on-road' light rail links.

This submission from Orwell Park also challenges a number of NTA assumptions and does so under a number of headings:

- The failure of the proposal to grasp the needs and demand for public transport
- The inability of the proposal to supply the forecast demand for public transport
- The likelihood that many people will be inhibited from moving
- The failure to properly examine alternatives

Orwell residents also outline specific suggestions for improving the *BusConnects* proposal

Orwell Residents, Templeogue recommends that ABP APPROVE the application with the following conditions:

- Remove the fares process from all buses.
- Replace bus gates by bus priority.
- Limit construction and land-take to curtail expenditure.
- Preserve existing cycle lanes.
- Reduce penalisation of motorists by reducing bans on right hand turns.
- NTA to immediately initiate a proper and transparent study of continuing *MetroLink* from St. Stephens Green to South West Dublin – to resolve capacity and speed for public transport, and provide less penalisation of motorists.

I would ask ABP Inspectors to pay particular attention to the access to schools that could be severely impacted if this corridor is approved, as applied for. I am open to the ABP deciding that the proposals are sound. However, here is a list, a conservative list of schools, either along the proposed route, or served by the proposed route, or potentially impacted by proposed route changes:

Primary & Post-Primary Schools

- St. Joseph's Terenure
- St. MacDara's Community College
- St. Louis Rathmines
- Rathgar National School
- Presentation National School
- Pius X NS
- Bishop Galvin NS
- Bishop Shanahan NS
- High School
- Terenure College
- Templeogue College
- ETB Terenure

In the case of Primary Schools, the proposals suggest that it will be, while not impossible, it will be particularly challenging for parents to access these schools by cars. While it may be a noble aspiration to hope that all children could either be transported by public school bus to school, or travel accompanied by a parent on public transport, I think realistically, and regrettably, given the diverse distances children are forced, in some cases, to travel to school, the proposals create a lot of challenges – through bans on turning at particular school-bound locations. Equally, NTA's plans take no account of the justifiable unwillingness of parents to allow very young children travel alone to school on public transport. Children with intellectual challenges and physical disabilities, also appear forgotten, as do their older peers when it comes to the practical realities of implementing the proposed changes.

Not all parents can accompany children to school, either by walking, or on a bicycle or on a bus. A great many parents are under severe pressure, particularly at peak times – which is certainly when drop-off occur.

I would request that ABP analyses the proposals in this regard. If the Bord finds that they are fair, then that would be an analysis arrived at independently.

Rathfarnham Wood Resident's Association (RWRA)

Rathfarnham Wood Resident's Association raises particular concerns about a very short section of the Rathfarnham Core Corridor as it impacts lands at Rathfarnham Castle Park. These concerns do not relate to land take of gardens, or incursions on private space, but the impact of the scheme on Rathfarnham Castle Park itself by way of a CPO proposed in its application by the NTA.

RWRA is concerned about the proposed compulsory acquisition of a large portion of the woodland area of the Park. This is, and has been for many decades, a vital amenity for the local area and extremely important for biodiversity.

RWRA objects to the proposed widening of the Grange Road by taking land from the Park for numerous reasons outlined in detail in its submission.

My own view here is that, with a little imagination, the NTA could achieve what it needs, and it probably does need a dedicated lane for the Core Bus Corridor at this junction but could be much more surgical in its requirements; could utilise the park for the northern footpath and use the existing footpath space for its bus corridor. A pedestrian count on the northern side of that section of Grange Road might indicate little use of that footpath by pedestrians. But I want to acknowledge that a separate lane for a bus would be a significant advantage to the overall Core Corridor objective.

The RWRA's submission essentially makes the same point. The NTA can achieve its objective without damaging a mature parkland amenity and diversity space.

Some Missed Opportunities by the NTA and Some Causes of Concern

This Core Bus Corridor is required, in principle.

While it is described as the Rathfarnham Templeogue to City Core Bus Corridor, its 'reach' on the southside extends into Ballyboden, Grange Road and Hermitage, Knocklyon, Edmondstown, Firhouse and Ballycullen and on the west side to Old Bawn, Aylesbury and Tallaght. These latter areas are population and developmental growth areas.

As I make this submission, under the NTA's Active Travel brief, South Dublin County Council (SDCC) is designing Active Travel Schemes for cyclists which, I think it is not hyperbole to suggest, have no regard for buses. The scheme being constructed between the N81 and Old Bawn (along Killinarden Way and Firhouse Road West) has no regard for Buses in either its design or execution.

Opportunities for Bus Corridors or Corridor sections are being missed.

SDCC engineers have completed a preliminary public consultation on the next phase of that Tallaght to Ballyboden Active Travel Route.

I met with them and was taken through the route and the options they were looking at.

I raised the BusConnects piece with them – outlined opportunities along that route for additional corridors, or bus lanes or sections of bus lanes that would grant buses advantage at junctions, such as roundabouts - I was informed that SDCC is just dealing with the Active Travel Section of the NTA and not the BusConnects Section. And this along key routes that ultimately connect with this Core Bus Corridor proposed route.

My submission to ABP, is that conditions be set for the NTA to develop connections with BusConnects in the areas outlined above. A prime example is Ballycullen Road and Firhouse Road – both serve the geographies listed above and both eventually connect into this proposed Core Bus Corridor. Both these roads already have state of the art bus corridors and actually connect, one with the other. But both are completely overlooked pieces of infrastructure that could easily feed very effectively into this project and deliver commuters efficiently from Knocklyon, Ballycullen and Firhouse to various locations. But it has been completely overlooked – and the danger is that Active Travel Schemes could be further constructed, without recourse to public transport need or demand, and eventually have to be removed and replaced by systems which incorporate infrastructure for both cyclists and public transport.

What I have described are essential components of this Core Bus Corridor that have been simply ignored and overlooked. The NTA seems oblivious to the fact that Knocklyon, Ballycullen, Old Bawn and Firhouse are actually intimately connected to and reliant on this proposed corridor.



John Lahart TD
Dublin South West