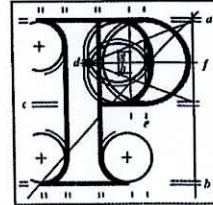


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Kathy Jacobs  
52 Rathdown Park  
Terenure  
Dublin 6W  
D6WVX89

**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](mailto: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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**Kathy Jacobs**  
**52 Rathdown Park**  
**Terenure,**  
**Dublin**  
**D6W VX89**

An Bórd Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

*14 August 2023*

Re: Bord Pleanála Case Reference: HA29N.316272

I am writing as a resident of Rathdown Park, Terenure working both from home and the city centre with 3 school / college children and a husband who works entirely in the city centre.

As a parent and citizen, I am very engaged on sustainability matters and am conscious of Ireland's responsibilities in this regard including the broader international commitments to reduce emissions and I would welcome *appropriate* transport solutions that makes the city function more sustainably. Unfortunately, Bus Connects is not such a solution and I object to the Bus Connects Proposal and especially in relation to the changes proposed in the vicinity of Terenure village where I and my family live.

While I am supportive of the *objectives* of Bus Connects as expressed;

*The Proposed Scheme has been designed to facilitate improved efficiency of the transport network through the improvement of the infrastructure for active (walking and cycling) and public transport modes making them attractive alternatives to car-based journeys<sup>1</sup>*

the Bus Connects scheme is an analogue, 1950s solution to a 21st and 22nd century challenge. It is depressingly unambitious, lacking in strategic vision and will be obsolete almost immediately on implementation. Residents of this area have advocated for a metro but this has been ignored.

It is deeply disappointing that the opportunity is not taken to design for the citizens of the city of Dublin a mass transportation solution worthy of a modern city which would future proof our environmental impact.

A sticking plaster is being applied over a deep fissure and at enormous cost to communities.

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<sup>1</sup> [Chapter 2 - Need for the Proposed Scheme \(templeogueathfarnhamscheme.ie\)](http://templeogueathfarnhamscheme.ie) pg69



## Lack of Governance, accountability, consultation

I begin my comments with the appalling standard of consultation on this matter. It was a consultation in name only. By way of example, I attended a 'Zoom' consultation in November 2020 which had been poorly advertised among impacted residents and the conduct of this session was highly controlled by the Bus Connects representatives. None of the comments (exclusively adverse) made by the attendees were treated seriously and all were airily brushed aside. All objections and comments were 'fielded' with the dismissive 'I don't agree' with no supporting evidence or facts. The 2016 Census kept being referred to as the source of truth when especially post-COVID, it is clearly as relevant as the 1911 Census. This was not an exercise in consultation and attendees left feeling fobbed off.

The team from Bus Connects were on a number of occasions challenged on the appalling gender imbalance (zero females on their team) and merely disrespectfully ignored the several challenges from attendees on this matter. Yet again females and their concerns are simply brushed aside, and a group of men are making uninformed assumptions about how we live and manage our lives with no female voice / input. Its clear that this lack of representation has translated into lack of provision in the proposal.

Another COVID impact was that residents' groups could not meet and mobilise, neighbours could not meet or congregate to communicate the proposals which resulted in citizens who were impacted were not informed or even aware. The proposals involve an enormous amount of material to consider including reports, maps studies which require a lot of time and effort and perhaps expert input to assimilate and understand.

That this was taking place in the context of the COVID pandemic restrictions and the insistence by the Bus Connects team that there would be no accommodation for the restrictions, in my view, throws the legitimacy of this 'consultation' into question.

## Impact on Family Life, School, and Activities

As a resident of Rathdown Park in Terenure, the proposed Bus Connects in its current form will have huge detrimental impacts on the quality of my and my family life, which I believe is replicated across the area.

On a personal level, for many years I walked from home in Harolds Cross to work in the City Centre, I have also driven to work, and I am making a conscious effort to move to bus use for accessing the city centre. I have tried in the past to cycle but had to give up as I found it too frightening. An appropriate expansion of the transport network, I would therefore welcome and without question would use. This Bus Connects Scheme does not deliver such an appropriate solution.

Our family is deeply embedded within the community, attend schools/college locally and in the City Centre, and avail of the clubs and facilities in our leisure time;

- **School;** our children attend Marino College, St Mary's Rathmines and Loreto College St Stephen's Green;
- **GAA:**
  - all 5 family members are committed and active members of Kevin's Hurling and Camogie Club in Crumlin / Dolphin's Barn, in many roles, including as players, coach,



referee, and administrative duties. There is almost daily attendance by someone in the family at a Kevins event;

- Membership of St Jude's, Tempogue;
- **Cricket:** membership of Terenure and Leinster Cricket Clubs;
- **Rugby:** our son is a keen rugby player his school which requires (among other things) early morning training sessions in Rathmines and Donnybrook;
- **Fitness:** I have been a member of Carlisle for many years and the proposals would double the length of time to access the facilities there.

The journeys to and from training, meetings, matches, and all other related activities, some requiring the transport of sports equipment and car-pooling with other parents and these will be made considerably worse and may be rendered logistically impossible due to increased journey times.

Terenure area is in the face of it already well served by bus routes. This falls down however on close inspection. At morning rush hour it is almost impossible to get a seat on a bus in Terenure that will get into the city centre for commencement of normal business hours and the converse is true in the evenings. We know because we have tried - on many occasions and cannot risk taking the bus to school / work as the buses pass by full.

In addition, we use the local businesses and shops as much as we can, this activity will be largely unimpacted for ourselves, but we have other concerns in this regard (see below).

As a general point, the concept that all citizens should move around the city on buses or by bicycle is simplistic and has no regard for the complicated lives led by diverse cohorts of Dublin's citizens. As an example. how are young families meant to take babies / small children to creches and then on to their place of work (with perhaps a school drop-off on the way) on time using bus transportation? Having been the mother of 3 small children, who are now of an age where they can make their own way round, I empathise with that huge logistical challenge which would be impossible by bus. It is an inflexible response which will no doubt lead to many unintended consequences e.g., it may limit the job opportunities open to parents in young families who will be constrained by these considerable logistical obstacles.

### Proposal is Out-of-Date and Post COVID Life / Work Styles

From the documentation, it is clear that all the surveys, etc were done in the early 2010's with supporting data sourced from that time. We have also had the changes brought about by COVID19.

COVID-19 has changed the world of work in ways that we cannot know even now. We do however know that many businesses are re-thinking their office accommodation needs. Businesses have invested heavily to pivot to working from home, and they want to benefit from that unexpected, forced investment. The only sensible thing to do now is to pause this project to ascertain the outworking of the pandemic on working life. In the November 2020 consultation session referred to above, when the issue of the pandemic and the seismic changes it has wrought on working patterns and environment was put to the Bus Connects Team (several times) - the response by the Bus Connects team was to dismiss the idea that there would be any changes, and that if there were changes, (unbelievably) the response would be to *reduce the number of buses on the road following Bus Connects*. It is simply



unfathomable that permanent damage to the fabric of our built environment to our communities, villages, and way of life to put *less* buses on the road.

The previous practice of the transport authorities is noteworthy. In approximately 2014 when the then new contraflow was being constructed in St Stephens Green, we received notification that the buses (from memory I believe the 55, 55A and 55B) which had a bus stop right outside Loreto College which our daughters attend would be *temporarily* suspended from that location and moved to Camden St for the period of the works. In the event, the withdrawal was made permanent. The impact of this was that my younger daughter could not take the bus for a full year as she was simply too young to ensure her safety walking to Camden St. Therefore, when anyone with responsibility for transport says that the withdrawal of buses are an option – it must be assumed they will do so.

### Urban Village Impacts

As a Dubliner of only 20 years standing, having lived in Newry Belfast and London, it is clear that Dublin is a collection of villages each with its own character, 'vibe', architecture and so on. This is a very attractive characteristic of the City and should certainly be preserved in the face of all change.

This Bus Connect proposal has no appreciation of the urban villages and is blind to the consequences of not preserving what is an essential aspect of the Dublin urban landscape. Examples of how this is exhibited in the proposal;

- the removal of trees
- Compulsory purchase of parts of established residences
- Various road closures e.g. closure of the slip lane next to Supervalu in Rathgar, a much-used business;
- widening of roads
- more no right / left turns
- roads getting *more* traffic

These are just examples of how the villages will be negatively and irreversibly destroyed and communities cut off from easy access.

I have following particular observations to make in relation to the proposed changes in Terenure;

- The proposed 'no right turn' at Terenure College is impractical, will cause huge dislocation. It will also ultimately be impossible to police (this was admitted in the Zoom meeting by the Bus Connects representatives) meaning that law abiding citizens will be adversely impacted those who don't have regard for the law will flout it;
- The closing off of Templeogue Road at Olney Crescent going into town and cutting off access from Rathdown Park will choke off access to the city for many residents and add to the journey times and congestion.
- The pushing of all traffic from Rathfarnham Road through Rathdown Park will cause choking up of the Rathdown estate with traffic. It is already very congested with being used as a 'rat run' at rush hour and other busy times at the weekend, but the proposal will increase this to all day every day as a permanent feature. We have already had experience of an ambulance being unable to access a residence due to weekend congestion. This, along with the 'no right turn' at Terenure College mentioned above, would mean that all traffic will have to enter the



estate off the Rathfarnham Road which is already congested. The traffic at the weekend trying to access Bushey Park for GAA, rugby, tennis is already at intolerable levels.

- As an aside, it is difficult enough driving round Terenure village with all the 'no right turn' / no left turns as it is, the village is becoming unnavigable.
- I use many of the businesses in Terenure. The proposals will destroy the village character and in solidarity with the business owners of Terenure who have been through so much in 2020 and have coped admirably, I object to the further restrictions on businesses which will inevitably close because of being cut off from its customers. People will simply stop visiting the village and access will be difficult leading to businesses closing and dereliction.

In addition, there have been myriad changes to the City Centre since the pandemic to accommodate cyclists and introduce outdoor dining. The Bus Connect scheme itself consider each neighborhood and each section in silos. There has been a lack of strategic vision as to what these changes along with the Bus Connects will impact the city as a whole. These changes have been introduced piecemeal to the benefit of certain cohorts only and are exacerbated by the siloed nature of the Bus Connects planning application.

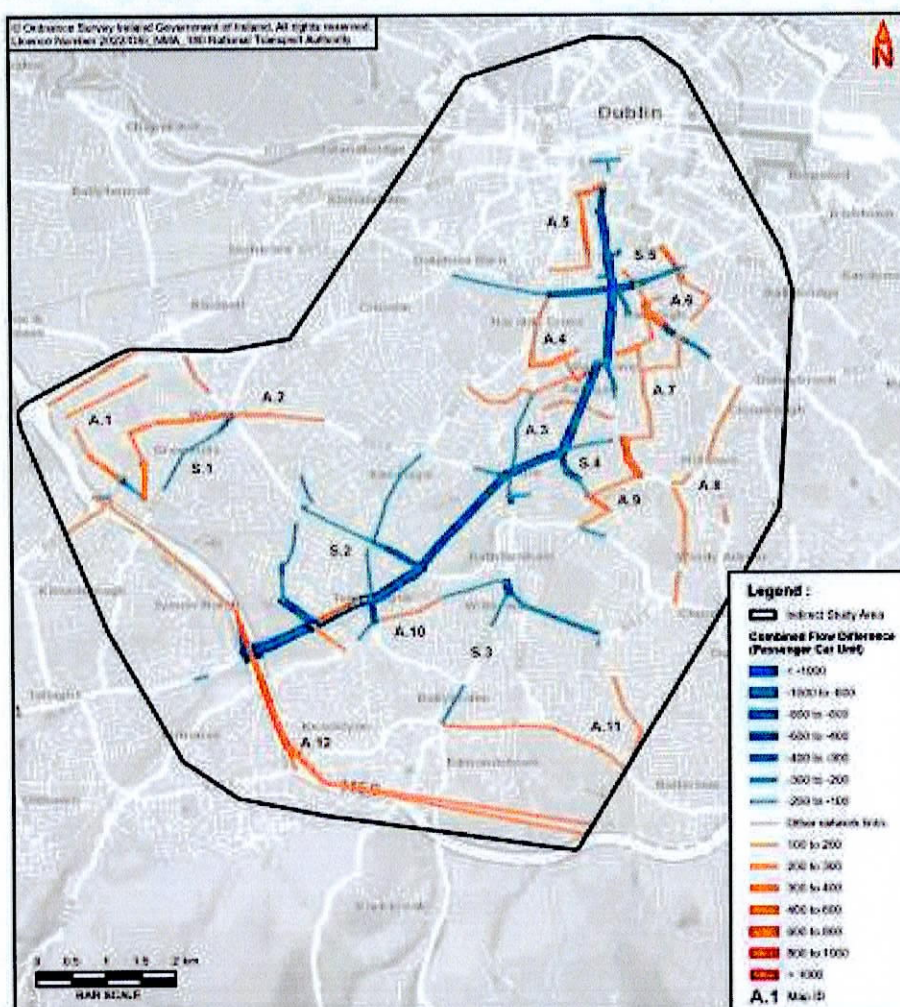
## Cost benefit case is not made

The benefits as described in the planning application are marginal and unlikely to survive the anticipated increase in population. The disruption, and dislocation of communities will be considerable, irreversible, entirely negative with absolutely no discernible long-term tangible benefit. The negative impacts include;

- Increased traffic in certain roads<sup>2</sup> which is admitted by the NTA with the attendant increased journey times; the table below from the Transport and Traffic report shows in orange / red where traffic will be *increased* as a result. The proposal also only considers peak time only – and not other times when residents have to live with the changes and move around the city.

### 6.4.6.1.15.3 AM Peak Hour – General Traffic Flow Difference

Diagram 6.40 in traffic flows on the road links in the AM Peak Hour for the 2028 Opening Year. Please see Appendix A6.4.4 (General Traffic Assessment) in Volume 4 of this EIAR for the full LAM outputs.



- Removal of various bus stops and (inexplicably) bus routes.
- Lack of provision of cycle lanes along the route
- Installation of bus gates with attendant disruption to established routes.

<sup>2</sup> [Chapter 6 - Traffic & Transport \(templeguerathfarnhamscheme.ie\)](http://templeguerathfarnhamscheme.ie) pg153



All of the above will result in disruption of local journeys, displacement of traffic rather than reduction, dislocation of village communities' it is clear that the inevitable increased journey times will exacerbate emissions which calls into question the sustainability claims of the scheme.

### Conclusion

In summary, Bus Connects should be stopped immediately before any further taxpayer money is wasted on it. The NTA must be charged with designing a truly fit-for-purpose transport solution for citizens capable of standing the test of time, but without the needless attendant extreme dislocation of lives and communities, degradation of quality of lives, environmental and habitat destruction.

I trust the above will be of assistance to An Bórd in its deliberations.

Yours faithfully,

Kathy Jacobs