Our Case Number: ABP-316272-23

An Bord Pleanála

Margaret Silke
67 Terenure Road East
Rathgar
Dublin 6
D06 HP60

Date: 10 July 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.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

BP Aon Flynn

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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To: An Bord Pleanála (Strategic Infrastructure Division)
64 Marlborough Street
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I am the owner of 67 Terenure Road East, a property affected by a compulsory purchase order under the **Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme 2023.**

I wish to object to the Planning Application and to the Compulsory Purchase Order. In so doing, I wish to emphasise that it is impossible to understand the full impact of the proposed CPO on my property in the absence of detailed final design drawings (including sections and profiles). I reserve the right to expand on my submission at the oral hearing.

I understand - as someone whose property is affected by a CPO - I do not need to pay the customary fee of €50.

My objections are as follows:

1. The land take proposed for Terenure Road East (TRE) does not make sense when one considers the traffic volume repercussions of the broader Route 12 plan. It's time to pause.

An inevitable consequence of the Bus Gate initiatives at Military Road and Terenure Library is a major diversion of outbound traffic away from Rathmines, Rathgar and Terenure. Car traffic coming from town will be forced to cross the canal at either Harold's Cross Bridge or Charlemont Bridge (Ranelagh) to "get home".

Apart from people who actually live on TRE, most commuters will opt for an alternative route. Including TRE in one's outbound route will make no sense.

Only those living in the immediate area will attempt to enter Rathgar Village via Highfield Road and journey on via TRE. Using TRE as a through route will be challenging, especially given a complex junction at Terenure Cross (at which buses will now be able to make a right turn coming from Rathfarnham) and given the new bus gate at Terenure Library.

The NTA itself accepts that traffic volumes will be much reduced on TRE. In its published documentation (www.templeoguerathfarnhamscheme.ie) in Chapter Six (Traffic & Transport) on page 161, the NTA predicts an evening peak hour reduction of traffic on Rathgar Road from 782 to 70 and on Terenure Road East from 903 to 386.

So the NTA accepts that there will be much reduced private car volumes on TRE caused by the broader Route 12 plan. Therefore, it is unnecessary to proceed with the proposed new bus corridor on a section of TRE (from the old Argos House to Greenmount Road). **A priority bus signalling approach** – already in place and operating successfully - will do the job just as well at virtually zero cost.

Accepting the logic of this argument will relieve the NTA of major expense (in terms of CPO compensation), and major inconvenience (dealing with affected property owners and the conservation lobby). It would also be beneficial for the NTA (in public relations terms) to avoid being responsible for damaging the TRE built heritage, where there are 77 protected structures on one road. The NTA would no longer have to remove original railings, stone boundaries, mature trees and parts of gardens.

The proposed road widening will take out many of the most **significant trees** on TRE. Indeed, there are trees endangered by this proposal which are not included in the NTA map, such as the trees at Beaumont House. All in all, TRE has a significant natural and built heritage which should not be interfered with lightly.

2. The consultative process pertaining to the Core Bus Corridor Scheme has been unfair and undemocratic. It's time to pause.

The Covid-19 pandemic and associated movement restrictions made it virtually impossible for communities to gather and discuss the impact of Bus Connects. Many impacted residents and communities were not comfortable with Internet technology and were unable to access information, maps and brochures. Similarly, many could not engage with virtual consultation rooms. This meant that many affected citizens were effectively excluded from the process. "Virtual" community meetings presented the same limitations and exclusions. All in all, the public consultation was unsatisfactory and undemocratic.

Local political input from City and County Councillors to the Bus Corridor process appears to have been neutralised, paying little attention to formal local authority development plans. It seems that no consultation took place with the Dublin City Council (DCC) or South Dublin City Council (SDCC) conservation authorities regarding the impact of the NTA's proposals on the historic heritage villages and communities of Rathmines, Rathgar, Terenure, Kimmage and Templeogue.

The NTA proposals openly conflict with the Dublin City Development Plan 2016 - 2023 for the future development of Dublin's villages and local communities. This suggests a detachment from the shared civic responsibility to preserve our urban heritage. It also implies a democratic deficit in the nature of the Bus Connects planning process.

Many members of the public feel that the NTA has not listened to local residents and business owners. The over-riding impression following extended private contact with its officials is that they are going through the consultation motions and have not listened to well-grounded concerns and objections. Regrettably, the NTA has for some time been coming across as a law onto itself.

The style of the consultation process has been infuriating. Piecemeal release of the network redesign and core bus corridors has diluted the public's capacity to meaningfully engage with the consultation phase and has had the effect of limiting opposition. In effect, the public consultation process has been orchestrated to limit the ordinary citizen's participation.

Members of the public are assured over and over again that all the information they require is on the Bus Connects website, but the layman finds that the available information is obscured by technical language, technical drawings, engineering-speak, etc. It is not possible to access data which is readily understandable.

A proper process of engagement would allow for discussion and, indeed, *negotiation* with residents' representatives on an area by area basis. The local knowledge possessed by local residents would enable them to respond to NTA proposals by suggesting practical and cost effective alternatives. Such a pragmatic communication process would by and large result in a compromise set of proposals which had the support of the general public. Unfortunately, the NTA has operated to date in a manner which abhors dialogue and assumes that a State juggernaut can inexorably crush all opposition.

Under the Aarhus Convention members of the public have a right to participate in a range of decisions where there may be an environmental impact. The Bus Connects project may be playing close to the wind in the arbitrary way it defines "consultation" (especially during the pandemic) and it is possible that a future appeal under the Aarhus Convention by disaffected members of the public may result in major scheduling setbacks for the NTA.

The NTA has made little effort to make simple effective communication its byword. Box-ticking "consultation" of this kind is profoundly undemocratic. It erodes faith in the important principle that public servants serve the public. It helps to generate ill-founded conspiracy theories. It leads to a feeling of helplessness in the minds of ordinary citizens. And it undermines the social contract.

3. There is no indication that the NTA's plan is robustly costed. It's time to pause.

The NTA puts the cost at €2 billion with exact final costs to be estimated. A trustworthy Cost Benefit Analysis is required; yet there is no clear data suggesting that the current proposals represent good value for money for the taxpayer. An overall improvement of 7 buses per hour (i.e. from the current 63 buses per hour to a projected 70 per hour) hardly seems to warrant such a massive investment. There also appears to be a major problem with bus capacity in terms of procuring bus stock and recruiting bus drivers.

In the aftermath of a pandemic which has **radically affected working patterns**, Bus Connects should be reappraised. A host of assumptions about population movements and traffic volumes are now questionable and pausing the plan seems not just desirable but imperative. In general, given the unreliability of historic public infrastructure costings, the NTA's plans and cost justification for the 12 Core Bus Corridors - for which statutory applications are now being made - are clearly of concern to taxpayers.

4. Bus Connects seems to be an all or nothing plan. It's time to pause.

There is surely merit in trialling or implementing various aspects of the plan to verify the time or money-saving estimates. For example, the NTA itself says that a cashless bus network will provide up to 50% of the bus journey savings it is forecasting. The NTA estimates that the 7-8 minute improvements in peak time travel along the Rathfarnham corridor will be achieved primarily by implementing priority signalling and cashless fares (as there are already significant bus lanes along the route). So why not press ahead first with the cashless bus initiative? This will enable the NTA to put together a transparent budget for this aspect of Bus Connects, to implement this phase, to verify the time savings and all in all to compare its current claims and forecasts with a real world outcome (in advance of spending billions).

In general, so as to be more transparent with the public, the NTA Bus Connects Plan should clearly separate time savings brought about by creative low cost measures and

time savings brought about by the proposed bus corridor infrastructure per se. The cost benefits of a Bus Connects Plan minus the low cost measures (which can go ahead independently) may not be compelling.

On a wider issue, the NTA's focus on Bus Connects fails to plan for long term strategies that will serve the south west city more favourably, not just in the short term but well into the future. The ideological resistance of the NTA to the logical long term solution to Dublin's transport issues – an underground metro – is not in the public interest. There is a strong possibility that by the time this project is completed it will be obsolete and population growth will necessitate a more sustainable solution.

5. Once the landscape and fabric of the historical suburbs is changed, there is no going back. It's time to pause.

Cllr Deirdre Conroy (an architectural heritage specialist) made a number of fine submissions to the NTA in Spring 2019 and Spring 2020 covering (among other locations) Rathfarnham Road, Terenure Road East and Rathgar Road. She detailed the impact on those family homes on Rathfarnham Road that are affected by the removal of up to 6 metres of severely gradient driveways. (The bus route and proposed bus corridors end at a junction which cannot be widened).

The significant alteration to transport patterns arising as an outcome of the pandemic suggest alternative solutions must be considered by the NTA, as opposed to the destructive impact of bus corridors on the residential roads of this historic area. One also queries the benefits of the minimal bus journey time saved on the Rathfarnham Road section when contrasted with the enormous cost of compulsory purchase compensation and associated construction.

Deirdre Conroy made a separate heritage submission in April 2020 regarding Terenure Road East. She noted that the architectural heritage of our capital city and its few historic suburban villages must be preserved. Streetscapes from Victorian, Edwardian and Art Deco periods containing both listed and unlisted buildings deserve protection. We should never repeat the mistakes that ruined historic Dublin in previous decades.

The implications for side roads of rat-running (to avoid bottlenecks and one-way road systems along the proposed routes) further compromise these heritage areas.

6. The NTA is approaching the project in a very technocratic fashion instead of exhausting all the "common sense" ideas first. It's time to pause.

The proposed massive infrastructure programme needs to be paused. In its place, the NTA should run a major trial (for at least six months) deploying a package of low cost measures, and evaluating the impact of this package before going any further with the high cost aspects of Bus Connects. Here are a number of ideas which might be included in this package of measures:

(a) introduce the proposed cashless buses system
(b) introduce hefty fines for drivers of vehicles which encroach illegally on the bus corridors – at least €1,000 plus penalty points for each offence [and enable buses to have cameras on board which provide evidence of such offences, with fine notices going automatically to owners of the vehicle number plates in question]
(c) provide more buses at peak demand times
(d) consider later start times for schools and universities, thus evening out traffic flow over the current artificially intense peak hours

(e) retain independent traffic management consultants to look at traffic flow in the city and, in particular, at inadequate management of traffic light synchronisation and adjustment where delays and build-ups occur [why not transfer traffic light management to a private entity? There is a suspicion on the part of motorists that DCC wants to create congestion along certain routes, and that such manipulation generates traffic figures supporting NTA and DCC policy preferences]
(f) put mandatory school bus transport in place to reduce the volume of cars bringing children to school
(g) introduce congestion charges
(h) establish Park and Ride locations with a free ongoing bus service
(i) deploy a specific corps of traffic management staff to get to grips with poor driving habits, traffic offences, faulty traffic light synchronisation and change times, counter flow/ intelligent bus priority signalling, breaches of congestion charge laws, etc.

In this context, the NTA should be asked to detail the level of consultation which has occurred to date with the people responsible for monitoring traffic flow, namely the Dublin Regional Traffic Control Centre. The NTA should also detail the ongoing level of consultation with the DRTCC which will obtain. I am sceptical that the necessary liaison is currently taking place.

7. The Rathfarnham to City Centre corridor will introduce a new right turn for buses, taxis and bicycles at Terenure Cross, from Rathfarnham Road towards Rathgar via Terenure Road East.

This will add an extra traffic light sequence to an already complex junction, reducing time available for vehicles from Terenure Road West/Templeogue Road to move across the junction. The diversion of buses coming from Rathfarnham down TRE instead of proceeding to Harold's Cross seems justifiable only in terms of NTA & Dublin Bus convenience. Adding an additional 12 right-turning buses per hour to what will now be an extraordinarily busy route (totalling 72 buses per hour going through Rathgar) makes administrative sense but not "real life" sense to the residents affected.

However, if this measure is set in stone, it is unwise to permit taxis and cyclists to turn right at Terenure Cross. Such a measure will wreak havoc at the Cross and guarantee local traffic congestion at even nominally quiet times of the day. I would urge the NTA to reconsider the cyclists/taxis aspect of their proposal.

8. The loss of on-street parking, loading areas and local access will adversely affect local traders and businesses.

Rathgar and Terenure traders/businesses will lose access to their customers due to parking/loading restrictions. As business suffers, villages and neighbourhoods will decline. Will the NTA will provide alternative car parking for villages in lieu of the removal of on street parking and loading facilities?

It is worrying that business owners in the roads and areas affected by the NTA's proposals have up to now been required to make submissions in the absence of much relevant data underpinning the NTA's programme (e.g. no available environmental impact studies, no credible traffic volume studies). These studies and reports have now been issued but residents and business owners have only been allowed allowed 8 weeks to read and analyse this highly technical material and to prepare submissions to An Bord Pleanála. This restricted time frame is unfair and undemocratic.

9. Overall, the scope of the Bus Connects plan is excessive – providing a 24/7 plan for a 4 to 6 hour problem.

Beyond rush hour, traffic flows freely. The NTA should examine the necessity for certain aspects of the Route 12 proposal to operate for most of the day. For example, must the Bus Gates operate for 14 hours a day (6 am to 8 pm)?

10. Cycling arrangements are unsatisfactory and piecemeal in many places.

The proposed arrangements give the illusion of a plan when in reality the lookout for cyclists is both chaotic and dangerous. I speak as a cyclist myself. Allowing cyclists to turn right at Terenure Cross onto Terenure Road East, for example, is unsafe.

It is puzzling how the much vaunted "segregated cycling lanes" will be kept segregated (i.e. unoccupied by cars parking or pausing). To be fair to cyclists, they cannot be blamed for expecting cycling lanes to be reserved for exclusive cycling use. The Camden Street / Georges Street area is especially chaotic for cyclists, with many businesses operating along this route such that loading bays are extremely busy.

Several of the cycling campaign groups have indicated what is already obvious - cyclists will always take the most direct route. They will not take a circuitous alternative (i.e. where no cycling lane is provided and a diversion is recommended and put in place). Any proposed "diversions" are not credible.

11. The inevitable creation of rat-running to avoid bottlenecks and one-way road systems along the proposed routes will seriously compromise the safety of local residents of all ages.

Many of the routes under threat of increased traffic volumes are local suburban roads, some of which also contain schools. They were never designed or intended to carry the anticipated traffic volumes arising from displaced through-traffic.

The NTA's bus corridor model assumes that impacted traffic can be streamed onto neighbouring radial roads. The logic of this approach is founded on a grid-based street model. Such models come unstuck where the proposed orbital routes do not have the capacity to accommodate the proposed volume of traffic or where the orbital options ultimately lead back towards the same downstream bottlenecks.

While it is difficult to assess the likely level of extra traffic that will try to use residential streets to bypass the bus gates on their journeys to and from the city, it should not be beyond the capability of the design team to provide modelling scenarios which forecast various "rat-running" possibilities. The planners should also make it plain where all the heavy goods vehicles are going to be diverted: this is an issue studiously avoided in the NTA documentation.

12. The combined impact on private cars of the bus gate at Military Road and the one-way system on Rathgar Road are very profound.

Locals driving into town will only have two access options – turning right onto Castlewood Avenue (opposite the Stella Cinema) or going through Harold's Cross. Locals driving out of town will have to cross the Canal at either Harold's Cross Bridge or Charlemont Bridge (Ranelagh).

All of these inbound and outbound options guarantee congestion. I believe that the NTA must flesh out this part of its plan in modelling terms and describe clearly what they reckon will happen in a post-Bus Connects world. The planners should go

through various scenarios – for example, travelling by car from Christchurch to Harold's Cross Bridge to Terenure to Rathfarnham; and travelling by car from Camden Street to Charlemont Bridge to Ranelagh and on to Terenure and Rathfarnham. These journeys should be modelled in off peak as well as peak traffic scenarios.

The NTA needs to spell out (under various location scenarios) how elderly residents will find their way home from Rathmines by car if they live on or adjacent to Rathgar Road or Terenure Road East. The full implications of the bus gate and one-way system proposals are not being spelt out. [Equally, no attempt is being made to model various likely traffic outcomes to residents of Castlewood Avenue and the Mount Pleasant area].

A particular issue arises on Rathgar Road. Between cyclists heading downhill towards Rathmines at high speed and frequent buses travelling at relatively low speeds, it will be a very tricky operation for residents to emerge safely in their cars onto the roadway.

A number of vulnerable elderly people are affected by possible compulsory purchase orders. They are learning of the proposed developments only by means of technical communications from the NTA. They have not yet been approached by a human being. (Other residents whose property is affected - and who would not regard themselves as vulnerable – are having great difficulty arranging personal meetings with an NTA representative to have the implications explained to them).

A further significant point relates to the **independent** traffic modelling put in place by the NTA for each of the routes Templeogue/Rathfarnham to City Centre; Kimmage to City Centre; and Tallaght/Clondalkin to City Centre. No attempt has been made so far to arrange **integrated modelling** (i.e. the cumulative and inter-related impact of these three routes working together). Until this critical level of modelling is provided, the potentially chaotic impact generated by all the proposed measures being implemented at the same time will be masked.

13. Only when planning permission has been granted is the acquiring Authority (the NTA) in a position to demonstrate that there is any need for the compulsory acquisition of the lands contained in the order. In terms of the application before the Bord for the approval of a Compulsory Purchase Order for the proposed Scheme, **it is premature to consider the approval of a CPO, since the Scheme does not have planning permission;** nor has the NTA established that there is a need for the Scheme or that the lands to be acquired are in fact required in order to perform a defined statutory function; nor has the NTA considered alternative solutions and identified sufficiently the nature of the problem which their statutory function requires them to address.

Margaret Silke

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07 June 2023