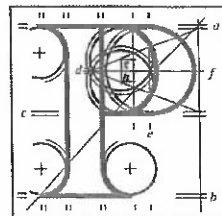


(Also on CPO case)

Our Case Number: ABP-316272-23



An
Bord
Pleanála

Michael Bermingham
6, The Townhouses
Terenure Road East
Dublin 6
D06 F7V2

Date: 26 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 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,

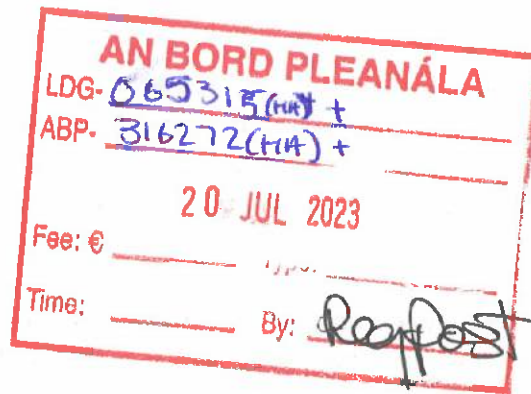


Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA02A

Tel	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Terenure Road East,
Terenure,
Dublin 6.
D06 F7V2
16th July 2023

To/For the attention of:

An Bord Pleanála (Strategic Infrastructure Division)

64, Marlborough Street,

Dublin 1,

D01 V902

I reside at 6, The Townhouses, Terenure Road East, Dublin 6, D06 F7V2. This, my residence, is a property affected by a compulsory purchase order under the proposed **Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme 2023**.

I wish to object to the Planning Application that has been submitted by The National Transport Authority under Section 51 of the Roads Act 1993 (as amended) in relation to the **Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme 2023** to An Bord Pleanála. I also wish to object to the associated Compulsory Purchase Order 2023 on my property and residence (Plot List: 1048(1).1d, 1048(2).2d).

Prior to setting out my objections, it is important to highlight the difficulty that remains in truly comprehending the full impact of the proposed Compulsory Purchase Order on my property when detailed drawings of the final designs, with the inclusion of profile drawings have not been provided. I expect that this issue will be addressed at the oral hearing stage, if not beforehand.

I now set out my objections which are as follows:

1. The Consultative Process to Date

The so-called 'consultative process' has not been fair, democratic or inclusive. In attending these "consultative forums", it appeared to me that this was a box ticking exercise on behalf of the NTA that would enable them to state they had followed due process. As these "consultative forums" were largely held during the COVID-19 pandemic, they had to be conducted on a virtual basis given the restrictions in place which limited movement and social gatherings. This made it very difficult for home-owners, residents and local communities to gather together to properly discuss the implication and impact of Bus Connects as proposed. Not all residents or community members are fully competent with online/internet technology, this made it both difficult to properly access Bus Connects information and maps. It also made registering for and accessing virtual 'consultation' meetings challenging, if not impossible. To have, directly and indirectly affected residents

and community members excluded from online community consultation meetings is neither just nor democratic. Those who did virtually attend community meetings, myself included, found the format of the meetings actually limited proper discussion, hindered inclusion and the necessary exchange of opinions. Hence, for me, not an open and fair consultative process.

Resident and community concerns and issues pertaining to Bus Connects raised by local public representatives across the political parties in both **Dublin City Council** and **South Dublin County Council** seem to have been negated with scant regard to existing local authority development plans. It appears that the conservation authorities in both Dublin City Council and South Dublin County Council were not consulted in regard to the adverse impact of the NTA's proposals in regard to Bus Connects on the historic suburban villages of Terenure, Rathgar, Templeogue, Rathmines and Kimmage and on those who live and work in these areas of old Dublin.

The Dublin City Development Plan 2016-2023 provides an "integrated, coherent framework to ensure the city is developed in an inclusive way which improves the quality of life for its citizens, whilst also being a more attractive place to visit and work." The NTA proposals, as they stand, are in direct conflict with the Dublin City Development Plan 2016-2023 in regard to the future development of Dublin's historic urban villages and their local communities. It behoves all residents and citizens to preserve this heritage and the NTA to factor this into the Bus Connects planning process. It was stated at one virtual consultative forum that this plan was recommended by a Canadian traffic management consultant based on work completed in his own country. It was astonishing to hear then that the NTA were accepting and recommending this plan despite this consultant never visiting Dublin. The adoption of a cut and paste approach as it is highly questionable as what may have worked for some city in Canada would automatically work here in Dublin.

Local residents support local businesses in suburban villages and now happens to an even greater extent since the Covid-19 pandemic. Residents and local businesses have legitimate concerns and objections have not been listened to during the 'consultation' process. A better staged and more transparent, proper consultation process would have provided more democratic engagement by facilitating discussion and dialogue with all concerned, namely residents, local traders and businesses, resident associations etcetera. There is a merit in using the combined local knowledge of those who live and work in or close to all suburban villages to draft proposals for Bus Connects that are based on consensus and compromise.

The Aarhus Convention enables members of the public to take part in making decisions where there may be an environmental impact. The NTA Bus Connects 'consultation' process has not promoted full and inclusive public participation in decision-making regarding a scheme that will affect both the environment and communities. The difficulty experienced by local residents and neighbours when seeking clarification on the proposals in addition to the fact that not all neighbours were simultaneously in receipt of revised plans (indicated, in a personal capacity, to the NTA on 14/04/2022) does not ensure a fair, complete and equitable consultation process.

2. Land Take via CPOs as proposed for Terenure Road East versus Traffic Volume/Density as exists and as likely on proposed Core Bus Corridor 12; Impact on Treescape and Landscape

On Terenure Road East traffic density is not high at all times in any given 24 hour period for 365 days a year; it is higher at limited peak times both in the early morning and the late afternoon to early evening, essentially 4-5 days a week during the academic year. A **priority bus signalling approach**, already set up and operating with success, staggers car traffic to speed up public bus transport along Terenure Road East with little or no cost. For this reason, it makes no sense environmentally or economically to proceed with the proposed core bus corridor 12 section that requires CPOs from Greenmount Road to Argos House.

The fact that work patterns have changed with an increase in work from home initiatives or hybrid working, a process accelerated by the COVID -19 pandemic and now legislated for, makes the proposed land take scheme unnecessary. The existing NTA plan predates COVID-19 and has not taken into consideration these significant changes with their knock on effect on traffic flows.

The NTA now accepts that the Core Bus Corridor 12 route will reduce the volume of traffic on Terenure Road East (www.templeoguerathfarnhamschem.ie, chapter 6, page 161). The planned Bus gate initiatives at Military Road, Rathmines and at Terenure Library, Templeogue Road will divert outbound city centre traffic from Rathmines, Rathgar and Terenure. Such car traffic will be obliged to cross over the canal at Charlemont bridge or Harold's Cross bridge. Only Terenure Road East residents and other local residents are likely to transit through Rathgar Village via Highfield Road. Using Terenure Road East as a through road will present challenges due to the impact of the new right turn at Terenure Cross for buses coming from the direction of Rathfarnham Village and also due to the impact of the Terenure Library Bus Gate.

With reduced traffic volume (already apparent) and the wise retention of the existing successful priority bus signalling system, it is illogical for the NTA to go ahead with a land take that will incur a high financial cost arising from CPO compensation for little apparent gain. It seems more sensible for a cost benefit study to be revisited in light of post COVID-19 changes, in particular hybrid working.

The NTA plan will permanently damage **period and other homes/properties** including many **protected structures**, a process necessitating the removal of unique and original railings, pillars and stone boundary walls. Furthermore, beautiful mature trees will be felled and sections of mature gardens removed to allow for road widening. The many trees on Terenure Road East enhance the landscape of the road and the vistas from Terenure and Rathgar villages, they improve the view and aspect of so many homes – both houses and apartments – in the locality. These **mature, indigenous trees** have a historic context and are an important part of the vista and visual imprint of Terenure for over a hundred years. For example, the beautiful trees in Beaumont House. The arborist Charles McCorkell has indicated that the plan as it stands will damage the roots of these fine tree specimens endangering them. Urban and traffic planning in other cities (for example, Naarm/Melbourne in Australia) seldom seek to destroy existing nature that promotes biodiversity and green communities in cities and suburbs.

3. Irreversible Damage to the Landscape and to the Heritage Properties and Suburban Villages

The effect of CPOs on properties along Terenure Road East, Rathfarnham Road and Rathgar Road, in some cases of up to six metres to facilitate road widening for Core Bus Corridor 12 will destroy the historical fabric of the locality and impact negatively on individual homes.

Along some routes, as indicated above, the bus corridor will funnel bus traffic into narrower routes/spaces/junctions that cannot be widened. Ultimately, all traffic on this route will be funnelled more rapidly into Rathmines for the apparent benefit of shortening bus journeys by 10 minutes at peak times (an overall 4 hour per day max. timeframe between Monday to Friday).

Traffic patterns and volumes have changed since the Covid-19 pandemic necessitating consideration of alternative solutions to costly road widening such as improved bus frequency or a cashless bus service for commuters. Such alternatives are more likely to make commuting by public transport more effective and time efficient while eliminating costs incurred with CPO compensation.

The **architectural heritage** of suburban villages like Terenure and Rathgar and roads such as Terenure Road East must be preserved. Victorian and Edwardian streetscapes merit protection for all in the locality and all visiting the city centre and suburbs. Local villages, the **local economy** and **local community** will suffer as a result of little or no **access to local on-street parking, lack of access to loading bays** and the advent of constant public transport through traffic. **Historic urban villages** must not go into decline which is detrimental on a social and community basis to locals or indeed become extinct as has happened with parts of historic Georgian Dublin in the past.

The proposed bus corridor 12 routes are likely to impact on adjoining and small side-roads that service residential areas and in some cases schools and clubs with increased 'rat-running' as a result of one-way systems and new bus gates.

Some **proposed cycle paths** make little sense as they are unlikely to be used by commuter cyclists if they are too far off the main access routes, for example, Terenure Road East. Also, turning right at Terenure Cross towards Rathgar will be hazardous and while segregated cycle lanes are desirable it will be hard to ensure such lanes remain safe and/or segregated in suburban villages requiring active loading bays at designated times and where all lanes must funnel into a narrower route.

4. Cost Analysis

I fail to see clear cost benefits in this project, costing an estimated €2 billion of public expenditure. This is a pre COVID-19 estimate and is now more likely to be in excess of this. Therefore, in my view, this does not represent value for the NTA, the public, local residents and businesses. Such an outlay to move, for example, from 63 to a projected 70 buses per hour on Terenure Road East is excessive, with questionable benefits and therefore cannot be considered an investment. Guaranteeing additional buses to meet capacity along with the necessary bus operators/drivers will clearly be challenging.

The need for increased bus capacity is questionable and must be reviewed in light of hybrid working trends that suit suburban employees and also employers that have relocated away from high cost city centre locations to more cost effective office solutions around the city.

5. Failure to Implement Aspects of the Bus Connects Plan to Assess Impact and to Consider implementing alternative Solutions on a Trial Basis

According to the NTA the introduction of a cashless public bus service will cover almost 50% of the bus journey savings it is predicting. Bus priority signalling systems where implemented reduce commute times. Implementing a cashless system on a trial basis is essential and efficient priority signalling for buses should be further assessed to review and compare time and prescribed times savings brought about by such low cost initiatives and those savings generated by the proposed core bus corridor 12 route.

In the long term, an underground metro system or South Dublin Metro or Luas line is likely to be more effective than the current Bus Connects plan, in addition to being more environment friendly and less destructive to historic localities and villages along the route. This has been the preferred solution for most modern cities.

Alternative measures that should be considered and put on a medium-term trial before Bus Connects proceeds include:

- i) A mandatory cashless public bus service
- ii) Banning private cars (except for residents and less abled drivers) in the city centre at prescribed times
- iii) Introduction of a congestion charge in the city centre
- iv) A system of community school buses to service local primary and post-primary schools or free travel for school going students
- v) Improved bus frequency at peak times
- vi) Increased time periods for bus access at priority bus signalling lights
- vii) Review of traffic light synchronisation at points along the proposed routes by an independent body, many motorists feel that traffic light signalling may be adjusted to create congestion (for example, Rathdown onto Rathfarnham Road)
- viii) Severe penalties/fines for motorists using bus lanes/corridors.
- ix) Free park and ride facilities in the outer suburbs for commuters using public transport on core bus corridor 12
- x) Free public transport as in some European cities

It must be noted that outside of peak times or rush hour in the early morning or late afternoon to early evening, traffic flows quite freely.

6. Impact of Core Bus corridor 12 on Terenure Cross, Terenure Village, Terenure Road East and Rathgar

The new right turn for buses, taxis and cyclists from Rathfarnham Road onto Terenure Road East occurs at an already busy and complex junction at Terenure Cross. Terenure village will be subject to increased traffic congestion impacting on local traders and community members and residents accessing the village. The safety of cyclists and pedestrians in and

around Terenure Cross must be considered if this proposal goes ahead, also the impact of extra buses on Terenure Road East for those who reside on this road.

Increased through traffic in Terenure and Rathgar villages will cause a reduction in business for local traders as customers and patrons lose on-street parking spaces or have restricted parking. This impacts all, particularly the daily lives of our elderly citizens where access to shops, pharmacies and GP's are essential for them. Running a business is more difficult as loading bay restrictions are introduced. It is unfair that those environmental impact studies that are available have been issued late in the day making the process of detailed review challenging for concerned residents and local traders.

7. Impact of One-Way Systems and Bus Gates on Secondary or Small Local Roads

Traffic diverting from one-way roads or bus gates will increase traffic flow or 'rat-running' on smaller residential roads. This will increase noise pollution, make such roads less safe for pedestrians and cyclists, also for children families making their way to schools or crèches. These residential roads are not designed to support heavy through traffic.

The Bus Connects plan remains poorly integrated and the dearth of traffic modelling studies makes it impossible to be confident that residential areas will not be subject to unprecedented traffic flow. The impact of the Bus Gate at Military Road and the one-way system on Rathgar Road severely limits options for those living in this locality.

The full implication of the Bus Connects proposals are not clearly set out, integrated traffic modelling has not been instigated by the NTA making it impossible to critically analyse the full impact of measures across the north and south city. Despite offering a personal engagement, the NTA and its representatives have declined to engage in a personal meeting or contact when requested. There remains a significant negative impact for those who live along or close to the Core Bus Corridor 12 as currently proposed.

As my residence is subject to a CPO under the Templeogue/Rathfarnham to City Centre Core Bus Corridor 12 Scheme 2023, it is my understanding that I am not obliged to pay the customary fee of €50.

Yours,



Michael Bermingham.

6, The Townhouses,
Terenure Road East,
Terenure,
Dublin 6.
D06 F7V2.