



Rathgar Residents Association

An Bord Pleanála (Strategic Infrastructure Division),
64 Marlborough Street,
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D01 V902

17th June 2023

Submission re Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

To An Bord Pleanála Board,

Rathgar Residents' Association was formed over fifty years ago, in 1971. The Association was established with the objective of maintaining and enhancing Rathgar and its environment. We represent hundreds of Rathgar residents who live, work and socialise in the area. We take great pride in protecting Rathgar's heritage and its many historic buildings and architectural features. The streetscape and public realm of the Rathgar area are a quintessential part of its makeup. It is an historic urban village and an important part of the fabric of Dublin.

The National Transport Authority has applied to An Bord Pleanála for approval for a proposed road development consisting of the BusConnects Corridor for Templeogue/Rathfarnham to the City Centre. This proposed bus corridor would cut through Rathgar and has very significant negative impacts for Rathgar Village and all of the surrounding roads and indeed many other urban villages and roads in South West Dublin. The claimed gains to the overall average speed of buses are too small to justify the burden being placed on Rathgar and the surrounding area.

BusConnects plans for the area were proposed in early 2019. Since then, the Association has proactively tried to engage with the NTA, but to little avail. In the intervening four years the community has found the whole consultation process frustrating and incredibly wearing. We are aware of many in our community, especially our older residents, who have found the consultation process very challenging, especially as it was often conducted online, even when the Covid pandemic restrictions were lifted, the process continued online.

The technical nature of the online documents has limited the ability of many residents in our community to fully understand the issues. We would also like to note our disappointment with the €50 fee required in order to make a submission to ABP on these plans which directly impact many of our members in Rathgar and residents of South West Dublin. Some residents who will be greatly impacted cannot afford the cost of making a submission or feel like they do not have the technical knowledge to make a submission to ABP.

While the initial Busconnects proposals have been amended through various iterations of NTA led “public consultation”, we believe the plans continue to unnecessarily overburden our village and surrounding roads, but offer little benefit by way of improved public transport. Residents, communities and businesses have been side lined as an inconvenient afterthought in the proposals.

Rathgar Residents’ Association fully supports improvements to Dublin’s bicycle lanes and public transport network, in particular from an environmental and public health and safety perspective. However, we also believe that Dublin’s environment, heritage and community should not be compromised by the introduction of the bus corridor proposed by BusConnects. In its current form, it promises to save commuters mere seconds off journey times.

We submit that the price is too high for so little gain: heritage, trees and wildlife are threatened across Dublin. Key concerns for the Rathgar area include the impact on environment including increased emissions, noise and loss of trees, Compulsory Purchase Orders on Terenure Road East (and further afield on Rathfarnham Road), traffic implications on all local streets and roads, the negative impact on the public realm and streetscape, the bus gate at St Mary’s College in Rathmines, one way traffic, right/left turn bans and the impact on the businesses in Rathgar during construction phase and due to loss of parking in the village and in the area. The RRA is also enormously concerned about the proposed reduced width of footpaths in the Rathgar area and also question the overall safety of the proposed cycle paths.

Road-widening, which threatens the architectural layout of our streets and will require the felling of mature trees, is strongly opposed by Rathgar Residents Association. Residents on many of our smaller streets and roads will suffer as a result of increased traffic flows and parking issues. Many villages across Dublin are at risk of losing their identity due to the proposed Busconnects design which is based on outdated road widening and indeed outdated traffic count data which was collected in November 2019 and February 2020. This data is no longer indicative of the traffic flows in and around Rathgar as residents can attest. CSO statistics reveal the change in commuter traffic and in the continuation of working from home patterns by so many workers.

Terenure Road East, Rathgar Village and Rathgar Road are not bus corridors. They form a residential area with schools, hospitals, places of worship, shops and a vibrant community. Spanning out from these roads are a myriad of smaller roads and streets which have their normal ebb and flow. BusConnects’ plans propose a total change in the dynamic of these roads, in particular Highfield Road which will now see an increase of traffic and the introduction of a new Orbital bus route. Many other side streets in our area will suffer devastating knock on effects including increased traffic, increased emissions due to congestion, one way systems and

parking issues. What the NTA has refused to do, however, is to the trial the proposed traffic changes.

Rathgar Residents Association submits that a comprehensive underground metro would allow Dublin's residents, commuters and visitors to access the city and its environs whilst saving Dublin's environment, built heritage and special character. The introduction of school buses would also make a vast improvement to the lives of both families and residents across Dublin.

The NTA admitted in its own material (page 3 public consultation January 2019) that:

"Growth areas can only be served in the short and medium term by the bus as opposed to the long-term projects such as rail and luas."

Four years have passed since that statement was made. The NTA admits that this is a short term solution which cannot possibly deal with the real issues; so why fell mature trees? Why CPO land to widen roads? Why undermine established communities? Why permanently destroy the Georgian and Victorian heritage of niche urban villages?

As a short-term solution there are many changes that could be made to make the current bus system more efficient at no cost to community and villages. These include policies aimed at reducing private cars on our roads; for example, implementing congestion charges and comprehensive park and ride facilities. Contactless payment has not been introduced despite being in use in neighbouring jurisdictions. In an age when payments are made via smart phones and/or Revolut, for example, the NTA has consistently failed and/or delayed the introduction of such measures in Dublin.

It is also noteworthy that the NTA has not proposed a new park and ride facilities at the Tallaght/Tempoogue M50 turn-off to encourage car drivers out of their cars and onto more environmentally friendly bus services (in the absence of a metro). The NTA is making no actual effort to take cars out of the system in South West Dublin nor is it encouraging commuting traffic to swap to bus services as they enter Dublin City which. Either would ease congestion on our streets and improve South West Dublin's air quality without requiring infrastructural changes.

There are steps that could be taken now which would improve bus times. It is impossible to understand why the NTA has delayed measures which would prioritise buses over other traffic. The NTA should also be required to introduce non-invasive measures to improve bus journey times for example by introducing priority bus lights, cashless fare on buses and other technical advances. It is exasperating – and frankly cynical- that these measures, in particular cashless fares, have been linked to this BusConnects planning vehicle.

One is left with the impression that the NTA is artificially attempting to obscure that these costly infrastructure changes will provide little improvement in time saving to the bus commuter journey by bundling the tried and tested non-invasive time saving measures in with the bus corridors in an effort to ensure that some positive time saving can be pointed to. This can be the only logical reason for the NTA's refusal to deploy effective modern computer-led solutions to bus time savings. There is simply no sound basis for resorting to archaic road widening and

tree removal. Jennifer McElwain, Professor of Botany at Trinity College Dublin, made a submission to the NTA against tree felling. We rely on that submission as hugely valuable trees are still to be lost unnecessarily. (See submission attached for your convenience.)

Rathgar Residents Association urges that all non-invasive improvements be made before any irreversible and detrimental changes are made to our villages, streets and the environment of Dublin and the Greater Dublin Area. We also believe that any proposed measures should be trialled before planning is granted to fully ascertain the impact of the BusConnects' proposals, particularly as traffic modelling as been performed in a piecemeal fashion. The traffic implications of all 12 corridors running concurrently have not been modelled let alone trialled in real time.

The true cost of the environmental fallout of traffic and congestion cannot be understood until traffic modelling for the entire Busconnects project is performed. Therefore, the Environmental Impact Assessment (EIA) submitted by the NTA for this corridor is fundamentally flawed and is not fit for purpose as it does not take into account the fall-out of other bus corridors in the area for example the Kimmage to the City Centre Corridor etc.

Given that the NTA has not proposed any new park and ride facilities for this bus route- and in view of the fact that it is the NTA's own stated aim is that BusConnects is intended to make it more difficult to drive a car in Dublin- an inevitable impact of this proposed corridor (with the traffic changes) is that there will be more not less car traffic; it will simply be rerouted. The NTA proposal offers no alternative parking solutions for commuters. Therefore, they will be forced to make enormously circuitous routes to the city centre thereby increasing emissions, and causing further negative environmental and congestion impacts. The traffic implications for residents and commuters alike have not been modelled; we fear that that is a deliberate lacuna in the data as it would reveal the chaos that will ensue.

In an age where AI is capable of so much and where there have been huge technical advances, traffic modelling is essential prior to any major road infrastructure project. If the NTA does not have access to the technical capability to model all 12 corridors across the wider Dublin area and has not performed this task, then planning permission cannot be granted. The data has simply not been collated. The plans are based on outdated traffic count data, fragmented and disjointed modelling, and a wholly inadequate EIA. We have been asking for this to be done from the outset.

RRA submits that the current plans overburden Rathgar village and surrounding roads with an increase of bus frequency which will be detrimental to the liveability of our village and area. The NTA's insistence on routing all buses from Templeogue/Tallaght and Rathfarnham through Rathgar Village puts a disproportionate burden on Rathgar (and on Rathmines). These bus routes could have easily been separated with a bus service interconnection in Terenure Village and separate bus services along Terenure Road East (towards Rathgar) and, alternatively, along Terenure Road North and Harolds Cross Road. Indeed, the interconnection of bus services lies at the centre of the Busconnects ethos so it is very difficult to understand the proposal to route all those buses along one route only (through Rathgar).

Moreover, it should be noted that all NTA Busconnects infrastructure public consultations separated the Tallaght/Templeogue to Terenure Village and Rathfarnham to City Centre corridors into two distinct separate consultations and are only now joining both corridors together for the ABP planning process.

Forcing all buses through Rathgar has the direct impact of overwhelming Rathgar village and community. The route had previously been designated as a cycle route, but that too has been reversed by the BusConnects proposals.

The NTA proposals will also lead to an inadequate public transport service for Harolds Cross Road which is experiencing a huge growth in housing and education facilities.

A major flaw in the BusConnects' plan for this corridor is that the N81 and R137 have been inexplicably bypassed. For years, the Rathfarnham to City Centre Quality Bus Corridor (QBC) has used the Harolds Cross Road as its route into the city centre. The R137 was identified as a QBC because it is a shorter, more direct, unconvoluted, and wider route to the city centre. Instead, BusConnects plans to have buses turning down the mainly residential Terenure Road East.

Signage in Terenure currently directs incoming city traffic via Harolds Cross Road. The NTA's decision to totally discount the Harolds Cross Road has the effect of leaving a large wedge of the city underserved by public transport while overburdening Rathgar and Rathmines, the latter which is already serviced by the Luas (at Beechwood and Charlemont).

Prior to BusConnects, there was BRT – Bus Rapid Transport. The Rathfarnham to City Centre Core Bus Corridor Report titled 'CBC FEASIBILITY STUDY AND OPTIONS ASSESSMENT REPORT' and dated December 2017 written for the National Transport Authority by DBFL Consulting Engineers and Transportation Planners and which can be found in the NTA Busconnects documents supporting this planning application on the NTA's website <https://templeoguerathfarnhamscheme.ie/> is a key document in this planning application. It is the scoping and feasibility study that the entire corridor is based on. It states:

“The Clongriffin – Tallaght BRT is of particular relevance to section 2 of the Rathfarnham CBC route. The CBC route should complement the BRT service but should not duplicate the potential routing of the Clongriffin – Tallaght BRT route, which is likely to travel via the Harold's Cross corridor as per the Transport Strategy for the GDA (2016 – 2035) and identified in Figure 1.2 of this report.”

The above section of the feasibility and options report has huge implications for this planning application. The Clongriffin – Tallaght BRT project while viable in 2017 when the report was written - has since been abandoned. However, the fact that the Harolds Cross Road was **excluded at the earliest stages of this current BusConnects project and never fully assessed and analysed is a fundamental flaw of this project.**

During public consultations with the NTA, the above flawed analysis was highlighted to the NTA by RRA and individually by residents. An alternative routing of this proposed corridor via Harolds Cross Road was proposed, but the submission was dismissed by the NTA with a few

paragraphs of generic text in the submission analysis. Failure to consider the Harolds Cross Road comprehensively – in circumstances where it was originally identified by the same agency for BRT – wholly undermines this planning application. A full rescoping feasibility study and option assessment, including population growth and access to bus services, is required. A refusal to acknowledge the flawed exclusion of what is a major traffic route from consideration when selecting routes leaves huge gaps in the credibility and soundness of this planning application.

Rathgar Residents' Association relies on the submissions and expert reports (attached) submitted during the consultation process by Rathgar Road Residents Group and the Terenure Road East Residents Group. Additionally, we support the individual submissions to ABP of our Rathgar Residents' Association members (some of whom are also members of the Rathgar Road and Terenure Road East residents' groups) and of the residents' associations in the South West of Dublin.

Regards,
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Vice Chairperson

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