



Councillor Carolyn Moore  
C/O Richard O'Carroll Room,  
City Hall,  
Dublin 2.  
August 15, 2023

Submission to An Bord Pleanála

*Re: Application number 316272, BusConnects Templeogue / Rathfarnham to City Centre Corridor*

To whom it may concern,

As the Green Party's Councillor for Kimmage-Rathmines I am writing to convey my observations on the National Transport Authority's (NTA) application for the **Templeogue / Rathfarnham to City Centre Bus Corridor (ABP Case reference: HA29N.316272)**. Throughout my involvement in various stages of consultation on this proposal I have broadly supported BusConnects, and welcomed the ambition to radically upgrade our public transport system. As our city recalibrates in the aftermath of the Covid crisis, and adjusts to changes in work and commuting habits, while continuing to work towards adaptation and mitigation of a worsening climate emergency, we cannot accept a return to a gridlocked city with chronic car-dependency, ever-worsening air quality, and the ongoing loss of biodiversity.

The imperative to offer safe, sustainable and low-carbon transport options has never been more urgent and I have always welcomed that the stated ambition of BusConnects goes beyond the provision of public transport to providing a more holistic sustainable transport solution, namely:

- ❖ *The aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.*

For this reason, I believe BusConnects will be an integral part of the transport solution for Dublin, but it has the potential to be so much more – it offers an opportunity to reimagine our city and plan for a future where Dublin is a connected, climate-resilient capital where streets are for people, private car ownership is an option not a necessity, and people can confidently choose the most efficient mode of transport for the journey they need to make, instead of feeling the private car is their sole option for every single journey.

The NTA also affirms that the Proposed Scheme is a key measure that delivers on commitments within the *National Development Plan (2021-2030)*, the *Transport Strategy for the Greater Dublin Area (2022-2042)*, the *Climate Action Plan (2023)*, and the *National Planning Framework 2040*. While these are critically important roadmaps to our low carbon future, it is vital too that BusConnects supports the delivery of the objectives laid out in the Dublin City Development Plan, specifically around the sustainable development of our city, and that it supports the modal shift necessary to reduce our city's transport emissions.

If we are to achieve that transition, it is essential that we bring people and communities with us, and I recognise that the NTA has listened to the public's concerns in previous rounds of consultations, and this on-going engagement is reflected in the proposal which is now before the Board for consideration. However, I feel it is important to acknowledge the limitations due to Covid of the consultation which took place in 2020, entirely online, and therefore potentially excluding some demographics, who - at this critical juncture - feel they haven't been adequately engaged with and do not have a full understanding of the implications this proposal will have on how they travel through and around the city, by whatever mode they currently use, including the existing bus network.

Perceptions about the quality and inclusiveness of the consultation which took place in 2020, combined with a lack of clear, accessible information from the NTA around specific elements of this current proposal, have contributed to a climate of fear and anxiety about the impacts of its implementation. Along with other public representatives, I had called on the NTA to make available combined traffic modeling showing the cumulative impact of the multiple corridors which are proposed for the Kimmage Rathmines area (Corridors 8, 9, 10, 11 and 12, to accommodate spines A, D and F) to allay some of these fears, and furthermore it was requested that these corridors would be the subject of a joint application to An Bord Pleanála so that the Board could consider that cumulative impact on the environment, planning and sustainable development, of multiple routes converging in the area.

I ask the Board to give due consideration to the submissions and concerns of communities who have had to grapple with and decipher the vast tracts of complex documentation which accompanied this application. I would also ask the Board to consider the following observations and ensure the Templeogue / Rathfarnham to City Centre corridor optimises its potential to deliver positive outcomes for the environment, the public realm and the quality of life of residents within the Kimmage-Rathmines area. I ask finally that in considering this application, An Bord Pleanála might recommend further revisions to the proposed scheme, as outlined below, to ensure that it delivers the future-proofed, holistic sustainable transport solution that Dublin needs.

## **PLACEMAKING**

While planned improvements to the public realm at several key junctions and urban villages are welcome, it is essential that every opportunity is taken to improve the public realm and - in line with the Dublin City Development Plan - make our villages and communities liveable, accessible, sustainable, and walkable/wheelable places. To support good planning and sustainable development, the opportunity for placemaking should have a higher priority in the general objectives of the proposed scheme; where placemaking is described as a measure to mitigate the impacts of the scheme, it should be a primary goal. As it stands, the potential for BusConnects to deliver significant enhancement to the public realm has been underplayed in the proposal and undersold to the communities set to benefit.

Optimising this potential would not just signify a commitment to sustainable development, it would also lead to better outcomes for public transport use. Simply put, if people can't walk comfortably to, and wait comfortably at a bus stop, they won't use the bus. For this reason, shelter designs must be safe, well lit, age-friendly and accessible; they should be safe for people with vision impairment to access and use, and designs should generally minimise the potential for conflict between pedestrians and cyclists. Furthermore, stops and shelters should be attractive and sustainable in their own right, and the NTA should look to 'green roof' design options in use across Europe to mitigate the impacts of biodiversity loss elsewhere in the proposal.

While recognising that the provision of efficient, regular and reliable public transport is a first step in enabling people to opt-out of private car ownership, it is essential that such a major overhaul of Dublin's primary public transport system aligns with the objectives of the city's Development Plan. To this end, public realm improvements should include widening footpaths; providing civic spaces, greening, rain gardens and biodiverse landscaping; and offer continuous, safe and segregated cycling infrastructure. We must take this opportunity to allocate the maximum space possible to people; to design our public spaces inclusively and with The Hierarchy of the Street in mind (see below); and to pave the way for a sustainable future where our streets and urban villages are not dominated by cars. Disabled parking should be prioritised over pay-and-display in all on-street parking plans, and age-friendly parking bays should be introduced for those with reduced mobility or no access to alternative modes of transport.



To take every opportunity to enhance the public realm in line with our city's sustainable development objectives, the NTA should:

- **Identify opportunities to improve the public realm in Terenure Village.** Terenure village is currently a badly designed space, hostile and unsafe for pedestrians, cyclists and other vulnerable road users, and yet BusConnects offers nothing by way of improvement to the public realm at the heart of the village. Interventions at the crossroads and beyond should be revisited to see if there is potential to allocated space to pedestrians; add safe cycling infrastructure on Terenure Road East and Terenure Place; reallocate space on Terenure Road North so footpaths can be widened footpaths or greening or landscaping added; and replace the proposed raised tables for continuous footpaths crossing the side roads so the pedestrian has priority.
- **Revisit the design of the T junction where Rathmines Road Upper meets Rathmines Road Lower,** and create a new seated, plaza-style space for the top of the village.
- **Close Wynnefield Road in Rathmines to traffic** to create more pedestrianised space and a better walking environment for Rathmines.

- **Revisit the design of the junction of Rathgar Road, Rathgar Avenue, Terenure Road East and Orwells Road**, and examine the opportunity to widen the pavement and create a south-east facing plaza on the north side of the village, opposite Supervalu.

## **PEDESTRIAN IMPROVEMENTS**

BusConnects has never been a single-focus transport proposal, and I'm glad that the opportunity to reallocate space to walking and cycling is being taken with this plan. The NTA must acknowledge the degree to which school drop offs and pick ups contribute to the traffic levels on our roads and ensure that safe walking, scooting and cycling along routes to schools can be undertaken.

If BusConnects is to create a healthier and safer environment for **all** users of our footpaths (hereafter referred to as 'pedestrians') then every opportunity must be taken to prioritise pedestrians and signal their priority with continuous footpaths across side roads; the addition of pedestrian crossings where desire lines exist; and wider footpaths and traffic calming measures where needed. The design and timings of pedestrian crossings should ensure that people of all ages and abilities can safely cross the road; and crossings should prioritise pedestrian movement over other forms of transport.

For planning reasons, all designs for pedestrian infrastructure must adhere to both the hierarchy of street design and the Design Manual for Urban Roads and Streets (DMURS). While this proposal lists where deviations from standards occur, it should be noted that deviations from standards do not occur on road widths, but they do occur on both cycling and walking infrastructure, which runs contrary to the hierarchy of road users.

While proper planning standards indicate that footpaths should be a minimum width of 2m, under this proposal this is reduced to 1.8m in some locations, and it's unclear if the indicated footpath width takes into account the inevitable presence of street clutter or street furniture on the final design.

To ensure the sustainability of the project and optimise the provision of safe, DMURS- and planning-compliant pedestrian improvements, the NTA should:

- **Ensure that pedestrians are given clear and visible priority along the corridor with the provision of continuous footpaths rather than raised tables on smaller / side roads in Terenure, Rathgar and Rathmines.** Not only will this make crossing these side roads safer and more manageable for wheelchairs users, pedestrians with mobility challenges, or people pushing buggies by providing a level surface on which to cross, it also creates a more visually cohesive public realm, and one that gives clear priority to pedestrians over vehicles at minor junctions. Examples of where this should be implemented include:
  - **Westbourne Road**
  - **Fergus Road**
  - **Cormac Terrace**
  - **Wesley Road**
  - **Winton Avenue**
  - **entrance to the Aldi carpark on Terenure Road East**
  - **Greenmount Road**
  - **Heathfield Road**
  - **Belville Avenue**

- **Garville Avenue**
  - **Garville Road**
  - **Spire View Lane**
  - **Rathgar Place**, and so on.
- **Ensure the future sustainability of communities by identifying and delivering safe routes to schools.**
  - **Ensure speed limits are appropriate for road use, and speed limits are adequately enforced.**
  - **Ensure all bus stop / bus shelter designs are safe to access, particularly for the visually impaired.**
  - **Ensure that pedestrian infrastructure and prioritisation is delivered on adjacent bus routes**, eg under the redesigned bus network, Harold's Cross Road will not be developed to accommodate a 'spine' and is therefore not included in this proposal, but it will connect corridors 11 and 12 and it will continue to accommodate buses (route 85), and therefore, to ensure a cohesive approach to sustainable development in the area, it should also benefit from improved pedestrian safety and prioritisation, including adequate crossings and the provision of continuous footpaths across minor junctions / side roads.

## **CYCLING IMPROVEMENTS**

Cycling infrastructure should be 24 hour, continuous, and segregated as much as possible, with careful consideration given to the interplay of bus stops and cycle tracks in order to minimise potential conflicts between passengers and cyclists.

Likewise the integration of disability access parking spaces should provide no opportunity for users of those spaces to find themselves navigating a cycle track as they exit or enter their vehicle, and every opportunity should be taken to reduce potential conflict generally between cyclists and pedestrians and cyclists and vehicles, with DMURS-compliant designs that respect the Hierarchy of the Street. It is clear from this proposal that, had the DMURS been rigidly adhered to, the NTA would not have ended up with this particular scheme and the deviations therein, which therefore constitute improper planning. Optimum road allocation is illustrated in detailed cross section drawings, and deviations from standards occur only in the provision of walking and cycling infrastructure, which runs contrary to the aforementioned hierarchy - for example, on Terenure Road East cars are the main priority.

Cycle track widths should be a minimum of 2m, yet we see them reduced to 1.5m in some locations within this proposal, including at Rathgar Road where they deviate from 1.5 to 1.3m. The NTA must acknowledge the degree to which school drop offs and pick ups contribute to the traffic levels on our roads and ensure that safe cycling along routes to schools is facilitated. For optimum buy-in from more vulnerable road users, and to maximise the opportunity to create safe routes to school, greater consideration should be given to the provision of cycle lanes that accommodate two-abreast cycling. Key routes servicing multiple schools (for example Rathmines Road Lower) should aim to facilitate two-abreast cycling by reconfiguring the allocation of roadspace to exploit the potential for a two-way cycle lane on one side of the road.

Finally, where road sharing is necessary, speed limits should be appropriate and adequately enforced; specifically anywhere that cyclists and cars share space should have a 30 km/h speed limit regardless of designation (eg Zion Road, where there is to be no cycle lane, should be 30 km rather than 50km/h).

For proper planning, and to ensure the sustainability of the development and optimise the provision of safe, DMURS-compliant cycling infrastructure, the NTA should:

- **Revisit the designs for the provision of segregated cycle lanes on Rathmines Road Lower.** As the proposal stands, the indicated cycle lane widths are not sufficient for the volume of cyclists already using this route without the benefit of segregated infrastructure. To achieve sustainable development, accommodate greater volumes of cyclists, and provide a bigger buffer from the traffic on this busy road, the NTA should explore the potential to implement a two-way cycle track along this stretch of the route. This would be preferable for a number of reasons, but primarily it would facilitate safe, guided cycling by parents bringing their children to and from St Louis, the Educate Together school, St Marys, and St Louis Snr school.
- **Ensure signal priority for cyclists at junctions.** The proposed provision of a Dutch-style junction at Dodder Park Road is welcome, however, priority signals should be installed to give cyclists a head start at this, and any junction where they could potentially come into conflict with left-turning traffic.
- **Revisit the designs for Terenure Place and Terenure Road East.** Cycle tracks should be safe and segregated, and every effort must be made to ensure they are also continuous. Under this proposal, cyclists traveling outbound on Terenure Place will temporarily share the road with vehicular traffic before linking in with a new outbound cycle lane on Templeogue Road. This is less than optimal, represents poor planning, and is contrary to DMURS as the car gets priority.

## **PUBLIC TRANSPORT IMPROVEMENTS**

Efficiency, reliability and regularity of the bus service is paramount if BusConnects is to instigate the necessary modal shift away from private car use and over to sustainable, public transport, and every effort must be made to ensure that the buses are not blocked by private modes of transportation, or indeed by delivery vehicles or illegally parked cars.

Additionally, for the sustainability of this development into the future, the NTA must ensure there is adequate capacity on all routes, as communities closer to the city will not be able to access improved services if buses are full when they reach the key urban villages of Terenure, Rathgar and Rathmines.

Finally, enforcement and monitoring of bus lanes, gates and new traffic measures will be crucial. On May 4th, 2023, in a reply to Neasa Hourigan TD, Minister of State at the Department of Transport, Jack Chambers TD acknowledged that:

*“With the State having incurred the investment required to deliver BusConnects, it is vital to ensure sufficient enforcement is in place to protect the benefits of that investment from widespread breaches of the restrictions applying to bus lanes, cycle tracks and junctions. To effectively ensure this outcome, camera-based enforcement will be required to augment the on-street activities of An Garda Síochána.”*

He stated that “camera-based enforcement also has a wider role to play in enhancing road safety, particularly at junction locations”, and affirmed that “Action 67 in the Road Safety Strategy Phase 1 Action Plan 2021–2024 sets out the need to “further develop camera-based enforcement by the Gardaí, including at junctions and for management of bus/cycle lanes.” The Department of Transport has arranged for the National Transport Authority, NTA, to undertake the first phase of this action, namely, to establish and chair a working group to make recommendations on how it should be progressed.”

It is imperative that the NTA prioritises the establishment of this working group and expedites the work needed to have camera-based enforcement in place to ensure the efficiency, reliability and connectivity of the A spine services on the Templeogue / Rathfarnham to City Centre corridor.

## BIODIVERSITY

While the NTA’s efforts to minimise tree loss in its revised BusConnects plans are welcome, further opportunities to maximise tree-preservation exist, and should be taken if the proposed development is to limit, where at all possible, negative environmental impacts. The Dublin Tree Strategy recognises the numerous environmental and social benefits of mature trees to our cityscape, from air quality and climate mitigation to amenity value, heritage and placemaking. As such, the NTA must strive to protect every tree possible, and planting schemes should take a holistic approach to biodiversity, with a focus on native varieties suitable for long-term retention, accompanied by pollinator-friendly plants, shrubs, flowers, and SUDs and rain garden designs where possible.

Likewise, greenways should be green - they should minimise the environmental impact of transport, not lead to the unnecessary removal of trees or established biodiversity-rich planting schemes, and new routes should be greened with the addition of native shrubs and no-mow or wildflower verges.

To minimise biodiversity loss and maximise biodiversity gain in this proposal, the NTA should:

- **Strive to identify an alternative proposal to the compulsory acquisition of woodland at the boundary of Rathfarnham Castle Park.** The design and layout of this park means removal of mature trees at this location, with the ensuing loss of undergrowth and wildlife (including roosting bats), would have a hugely disproportionate impact on the overall biodiversity of the park and the wider local environment. The NTA should consider installing **a bus priority light** at the end of the dual carriageway, at the junction with Butterfield Avenue, as a more sustainable, environmentally sensitive, locally appropriate, and potentially more effective solution.
- **Avoid the unnecessary felling of trees** and look to examples like the C2CC (Clontarf to City Centre Cycle & Bus Priority Project) where mature trees were incorporated into the design.
- **Install biodiverse ‘green roof’ planting on all new bus shelters.**

## TRAFFIC IMPLICATIONS

While the anticipated impact of a vastly improved, regular and reliable bus service (along with the provision of safe cycling infrastructure) would be a modal shift that would result in a large degree of

traffic evaporation, there are significant concerns that untenable volumes of traffic will be directed off the bus corridors and down residential streets.

On the Templeogue / Rathfarnham to City Centre corridor, the NTA's traffic modeling has lacked credibility for those with local knowledge, and this has led to confusion, speculation, and a good deal of local upset. There remains an alarming lack of clarity about the routes to be taken by HGVs and other large delivery vehicles, and the mitigation measures that will be employed if these vehicles are forced to use narrow residential streets due to the cumulative impact of bus gates, and although requested by myself at the last stage of consultation, there has been no indication of a firm commitment to or budget for 'aftercare' by the NTA – that is, ongoing traffic monitoring and mitigation measures where the quality of life, of air and of the immediate environment for residents has been significantly altered by the rerouting of vehicles.

Finally, assurances must be given regarding speed limits and enforcement of same, and proposals should be put forward for design interventions that will ensure compliance where reduced speed limits are in play. It cannot be assumed that the Gardaí will be able to monitor and enforce new traffic measures, including bus gates and right hand turn bans, so if the NTA is to rely on camera enforcement to augment the work of the Gardaí, it must prioritise the establishment of the aforementioned working group.

To adequately manage and mitigate the implications of traffic restrictions, the NTA should:

- **Commit to and budget for a programme of monitoring and mitigating adverse implications.**
- **Consider the use of modal filters to discourage rat-running.**
- **Expedite the work needed to initiate camera-based enforcement.**

## CONCLUSION

As a Councillor, I welcome the fact that there has been strong engagement to date on the BusConnects project, and that prior consultations have led to significant changes where the NTA have sought to implement community-driven solutions. It is unfortunate that Covid restrictions inhibited the degree to which that consultative approach could inform the final stage of the design, but this project is vital to the future and the climate-resilience of our city, and we must not miss this opportunity to get it right.

I would ask An Bord Pleanála to consider the observations above and support the necessary revisions and stipulations that will ensure that this project can be delivered in line with proper planning for the sustainable development of our city, and in a way that maximises its potential to transform our city, our urban villages and our communities for the better.

Kind regards,



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**ClIr Carolyn Moore**

*Green Party Councillor for Kimmage-Rathmines*