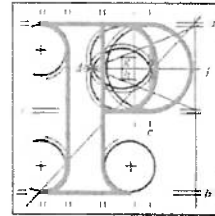


**Our Case Number:** ABP-316272-23



**An  
Bord  
Pleanála**

Elaine Timbs  
63 Rathfarnham Road  
Terenure  
Dublin 6W  
D6W YT96

**Date:** 24 April 2024

**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.

If you have any queries in the mean time, 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

HA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
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64 Sráid Maoibhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Bus Connects Submission

Bord Pleanála Case reference: 316272-23

Description: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

Case type: LA Road Dev - Application

Dublin City Council

*Mark*  
February 19<sup>th</sup> 2024

Submission made by:

Elaine Timbs

63 Rathfarnham Road

Terenure

Dublin 6w DWYT96

<b>AN BORD PLEANÁLA</b>	
LDG-	_____
ABP-	_____
26 MAR 2024	
Fee: €	_____ Type: _____
Time: <u>9:50</u>	By: <u>Hand Courier</u>

Dear Sir / Madam,

Further to your letter of 23 February 2024 I am writing with further submission to the response that An Bord Pleanála ("ABP") invited from the National Transport Authority ("NTA") to submissions made in 2023 with regard to their planning application for the Templeogue/Rathfarnham to City Centre Bus Corridor scheme under Section 217B of the Planning and Development Act 2000.

It is hard to understand, considering the immense resources of the NTA and the access it is afforded to ABP, how or why the NTA were granted a right to reply to the submissions for the planning application. What an affordance and convenience to a state organ, while citizens are corralled and silenced by the letter of the law. The NTA presented a self-certifying bible in justification of their scheme. A colossal read at 800 pages, it is filled with repetitions of their prior mantras and befuddling technical jargon, none of which become correct fact through repeating. Interestingly, there is not a single instance apparent where one comment or objection has been adopted to cause the NTA behemoth to reconsider or revise its autocracy.

In truth, the fallacies, inaccuracies and patent belligerence in the response document presented by the NTA displaying their apparent absolute confidence that they need only 'go through the motions' to obtain full permission for their application makes it all the more essential that this scheme is subject to an oral hearing at ABP.

In August 2023 I submitted a detailed set of observations to APB on this NTA planning application. I, like others, was forced to incur thousands of Euros in cost to obtain professional guidance in assessment of the NTA application and preparation of responses on areas of personal and general impacts and issues. I was confused to see the opportunity afforded to the NTA to respond and deny, dismiss and minimise the multitude of valid observations and objections submitted by the public to ABP.

From your letter of 23 February 2024 I am further confused as to what ABP is actually doing in this process. Are the observations and objections submitted in 2023 to ABP now dismissed, or considered addressed, for the NTA self-certifying response document, or are ABP actually assessing those observations and objections in an independent and impartial faction that should be expected by the citizens and taxpayers of this country?

Am I, a layman, now expected to make professional assessment and critical examination of the NTA application and recent self-response to determine fact or fallacy, validity or invalidity? They re-hash tropes and reinvent their 'facts' that have been thrashed and unwound in various forums over the past

seven years; it's almost unreadable in its infuriating off-handedness, its glibness and arrogance. If this is to be accepted as sufficient response to the valid observations and objections presented by a now worn-down sector of citizens that have engaged this 'process' for nearly a decade, then it's a desperate disservice to them and a damning mantle for ABP to be prepared to wear for their own convenience and facilitation of the NTA.

Do I have to re-justify my submissions, pay for professional advice again in the face of glib dismissal and unsubstantiated statement of fact by the NTA, where they wilfully hid or withheld the underlying relevant information from me and others when it was requested?

### Oral Hearing

It is unfathomable how ABP has determined that this application does not warrant an oral hearing at ABP. This NTA proposed scheme has been overwhelmingly opposed and commented upon since its first mention and throughout the NTA's process up to the application.

The NTA availed of multiple opportunities for pre planning consultations with ABP while affected citizens were allowed a paltry eight weeks to read a dense and highly inaccessible application document that is incredible light on actual detail. Citizens were expected to understand and respond without any professional guidance unless they could access and afford informed advisors. Many advisors are compromised by being in the employ the NTA (conveniently removing them from access by the citizen), the ability of a concerned citizen to make a cogent submission on that colossus of an application was greatly curtailed.

The decision of ABP in this regard has the unfortunate appearance of a hand in glove cosiness among state bodies that wholly facilitates the NTA to not just be the applicant, but judge and jury of its own application; a statutory procession to self-certification at the great expense and infringement of the citizen. Furthermore, the decision not to hold an oral hearing further smacks of ABP facilitating themselves in avoiding the chore of managing a hearing on this clearly controversial application. Given the groundswell of discontent at this determination it appears this will find its way to a further hearing before the courts.

Considering the criteria provided for an oral hearing being held for:

- strategic infrastructure cases
- appeal cases which are complex or where significant national, regional or local issues arise
- compulsory purchase orders and related cases
- other case types when considered necessary

Notwithstanding the absolute discretion afforded, ABP has to explain its rationale and decision making criteria, their application and rationale in coming to the decision that this application does not warrant an oral hearing.

### **Comments on the NTA Response to observations**

#### ILLEGAL DEVELOPMENT - Mandatory Part M Building Regulations Violation

Our property, a residential house at 63 Rathfarnham Road, Terenure will be impacted by this planning application through a compulsory purchase order ("CPO") that will remove 23.7m<sup>2</sup> from our front garden (Plot List 1073(1).1d, 1073(2).2d).

We requested from the NTA and their agents on repeated occasions specific detail and drawings setting out levels and the impacts on our property and in particular our driveway and frontage. We sought

drawings that would show the 'before and after' section presentation. None of this was forthcoming and was specifically denied to us.

Through our further engagement with ARUP (engineers appointed by the NTA on the Bus Connects project) we were verbally advised by David Collins on 28 June, 2023 that such detailed drawings (for our house) were prepared and were excluded from the planning application and that the NTA were not allowing these to be released. This was recounted to Mr Collins in writing for the record and not disputed.

We engaged NRB Consulting Engineers Ltd ("NRB") who carried out a detailed topographical survey of the road section of Rathfarnham Road (spanning houses 55 to 71). NRB commented on the surprisingly scant information included by the NTA in their planning submission. NRB prepared an analysis based on the information available from the NTA and their topographical survey to assess the impact of the planning application.

*The NRB findings were that in relation to our house, number 63, the access gradient of the house would be significantly steeper (by an increase of 67% in gradient) as a result of the NTA proposed development in this application and therefore represents an illegal development due to contravention of PART M building regulations.*

*A significantly steeper gradient is the result for a further five houses and a steeper gradient for another house – six houses negatively affected in total making these dwellings less compliant than they previously were.*

The NTA response to this observation, in a page of convoluted and qualified misinformation, was that they had specific detail and design drawings (a detailed 3d road alignment model, no less) for these properties and;

*"Notwithstanding the above, it is important to note that the design of the Proposed Scheme has been carried out so as to minimise impacts on adjacent properties and at this location is such that it will not result in any increase to the maximum driveway gradients at this property. This has been achieved through a combination of the following design measures aimed at minimising the impact on adjacent properties:*

- *Raising the centreline level of the road m at this location (as presented in the Mainline Plan and Profile drawings provided the Volume 3 of the EIAR); and*
- *Retaining existing footpath gradients.*

*The works may require minor regrading works within some properties but will not result in an increase to the maximum gradient experienced in these properties"*

Elsewhere in the NTA response document, referring to a section of Rathfarnham Road south of the Pearse Bridge the NTA state: \_

*"Widening into properties within this section of the scheme would require the road to be raised in order to maintain driveway gradients at existing grades"*

From this response;

- Why were we denied this very relevant specific detail and drawings to answer our questions?
- Elsewhere in their response, the NTA say, under clarification on temporary acquisition, regarding our property that temporary acquisition is required for regrading of our driveway. Our gates (which are electrically operated and kept closed for security purposes) require 2.5m of horizontal ground inside them on the driveway to open and close. Regrading a shortened driveway to reinstate these gates would significantly increase the gradient of remaining driveway, unavoidably. The NTA reply is therefore either wilfully untrue and misleading or indicative of their gross incompetence.
- The planning application submitted to ABP shows no information that the road level would be raised along this road section, if it were surely detail is required?

- Why is this very relevant information excluded from the planning application?
- The NTA state the gradient “*will not result in an increase to the maximum gradient experienced in these properties*”
  - These properties have varying driveway gradients in existence at present – ANY increase in the current gradients would result in causing Part M infringement. To increase the entire driveway to a maximum existing level at a given point would result in causing Part M infringement. This is an unacceptable response by the NTA. No fact has been produced by the NTA. Expert opinion contradicts the NTA’s unsubstantiated response. Increase of gradient is a breach of Part M and illegal.
  - Note that in shortening a driveway that is already a hill, the only regrading that can take place is to increase part of the slope to being steeper. The site of the house does not lend itself to decrease the highest point given the house being in situ at that most elevated point. We will not accept a regrading from our front door to achieve a false attainment of compliance.
- The fact that the increases to gradient (a 67% increase in the case of our property) of these driveways based on the data submitted to APB indicated such material increase, the resultant compensation required to the road centre levels would be material, but no mention of this is made in the ABP application submitted by the NTA.
  - There is no mention in the application that these road level increases would have direct impact to the access to houses on the opposite side of the road and Westbourne Road meeting Rathfarnham Road perpendicular to our house. How could the impacts to the opposite side of the road be excluded from the application by the NTA in the event centre road levels would increase?
- NRB Consulting Engineers Ltd have reviewed the response presented by the NTA and are adamant that, notwithstanding the insufficient detail provided (and denied) by the NTA, the NRB conclusions previously submitted (refer to their separate submission to ABP confirming their professional opinion on this matter) are correct and remain relevant to the fact that the proposed development will cause a Part M breach.

The NTA are clearly intent to avoid being deterred in the ABP application process and are resolved to bulldoze their way onward once permission is granted in the assumption that the affected citizens will be able to do nothing about the unavoidable Part M breaches after ABP accedes permission to this illegal development.

#### Cumulative impact of all CBC schemes on traffic not considered

No traffic modelling was included in the NTA application documentation that shows the impacts and integrated effect of immediately adjacent and associated Bus Connects routes. Despite the very significant diversions, amendments and restrictions proposed to existing traffic routes comprehensive traffic modelling was not included part of the NTA application, or any application under Bus Connects. The NTA have sought planning approval for a series of bus routes on an individual basis for each route alone. This is done in absolute isolation of any other route, even those routes that are immediately adjacent and/or intersecting. The result is that the reality of these schemes will, in terms of traffic and the environmental impacts, be completely underestimated and irreversibly damaging to the environment and fabric of the suburban residential areas.

The NTA planning submission for this route did not include any information or analysis that addresses the combined effect of the bus connects routes they propose and the traffic diversions, curtailments and restrictions they would introduce.

The NTA make a response to this observation of fact, that despite great length, touchstone referencing to software tools and a multiplicity of jargon, does not actually respond to these unavoidable facts in any respect. Yes, they modelled intersections to ensure buses would be given free flowing movement,

but there is zero connected thinking or assessment of broader and general traffic movement as identified.

The NTA ultimately accept that their proposed convergences and diversions would cause mayhem with existent usage of the roads, but offer the notion of magic after implementation of the Bus Connects scheme that there will be a transfer of all vehicular commuters to bus use and that there would be no discernible impact resulting at all. Incredible, from a revised bus service proposal that will have:

Less buses on the road,

Less bus service,

Less local penetration of service,

Less bus stops,

No real provision for orbital or local servicing for community travel,

No park and ride facilities provided additionally on any route.

In the scoping of Bus Connects the NTA advised the public that the population of Dublin was to increase by 25% and that they were catering for this. Will none of this increased population need to travel anywhere?

There is a disconcerting approach by the NTA as to the outcomes of this scheme that depicts no more than a sense of hope and fantasy about the eventualities, while the realities of these colossal traffic diversions for the west and south west access to the city are patently clear to the most average person on the street. The NTA deny and look to deflect and distract from the aggregated impacts of their various schemes which must unavoidably act and operate as a single system and be considered and assessed on that completed basis, not as single dimensional act of fantastical hope as presented.

The irreversible negative impacts on these residential areas traversed by the Bus Connects routes is immense. The vast majority of traffic restrictions could be limited to peak hours only, an hour or two per day. Local access for residents will be hugely curtailed and inconvenienced. The negative social impacts will be considerable and prolonged.

Please note that any instance where the NTA offers a response that is based on their 2028 Opening Year scenario of the Proposed Scheme is entirely unreliable and cannot be considered due to the fact that the NTA prepare these scenarios and projections based on the single route under application and not on a comprehensive traffic modelling assessment taking account of the myriad of traffic diversions, restrictions and re-routing that will come into effect from their various route amendments that are submitted under Bus Connect applications to ABP.

#### Park and Ride Facilities

From the beginnings of the NTA holding their (ultimately reneged and uncompleted) public consultations process and meetings the NTA were questioned about the volume of non-within Dublin originating vehicular commuters that arrive to Dublin every day. The NTA were consistently forthright that Park and Ride facilities on all access routes to the city were essential to be put in place. This has been raised by a multitude of submissions to ABP.

The NTA response to this is aggregated to a section of their document that no more than mentions this fundamentally essential facility for the routes to be a minimalised component amongst a list of aspirational talisman items that are badges on the Bus Connects concept. The NTA have provided no response on this critical element to provide a moderately functional revised bus routing exercise. This displays either an exceptional incompetence on the part of the NTA or an exceptional arrogance in expectation that the NTA's planning submissions will be approved by ABP irrespective of fundamental omissions or oversights such as this.

The NTA response at 2.1.1.11, notwithstanding its entire insufficiency to address the absence of any Park and Ride facilities being provisioned anywhere in the city, is perhaps confused as to the reason commentators have raised the Park and Ride requirements for the schemes. No right-thinking person would suggest that the provision of Park and Ride facilities would simply remove the suggestion that road widening was required in instances. Those with a modicum of common sense will realise that those extra Dublin commuters will have no choice but to persevere in private vehicles to their ultimate city centre destinations – unavoidable assurance of continued commuter traffic accessing the city by necessity.

#### *2.1.1.11 No park and ride considered*

##### *Summary of Issue Raised*

*A number of the submissions raised concern that the Proposed Scheme did not include any proposals for park and ride. These submissions noted that removing people from cars on the outskirts of the city and transferring to public transport would remove the need for road widening.*

The planning application submitted by the NTA is fundamentally flawed for the omission of Park and Ride facilities for all routes proposed given the interconnectivity the M50 provides as an orbital route with no provision for extra Dublin commuters being serviced by Park and Ride facilities for the Bus Connects amendments to the city. This omission is fundamental, an abandonment of a self-stated necessity by the NTA in preparing their preferred Bus Connects routes.

#### Air Quality Impacts as a Result of Increase in Traffic

We made submission stating concern that the environmental assessment does not adequately assess the section of road at our property. We referred to the health risks presented to our home at 63 Rathfarnham Road, Terenure exacerbated by the immense increase in traffic volumes that will be diverted to Rathfarnham Road, which will be rendered a grid-lock at all times of the day. We referred to the very well documented evidence on carcinogenic airborne matter including nitrogen oxides, particles, carbon monoxide and hydrocarbons as well as fine friction particles.

The NTA's initial submission and response document can be entirely disregarded given that their application, support environmental assessment data and report documentation and their response is based entirely on the estimated effects of a single route application and takes no regard to include any information or analysis that addresses the combined effect of the other bus connects routes the NTA propose to implement in the immediate locality and the traffic diversions, curtailments and restrictions that would therefore apply which will immensely increase the volumes of traffic on this route. Therefore, the environmental assessments data and results are meaningless.

Please note:

The NTA response report reference comment made from our property (page 427):

*"The subject of the submission, namely the residential property at 63 Rathfarnham Road, has been included in the air dispersion model as receptor AQ108."*

This refers to the Environmental Impact Assessment Report (EIAR) Volume 2 of 4 - Main Report Section 7.

The NTA response refers to points to data collected by air receptor AQ108 – there is no AQ108 to be found in this entire document.

<https://templeogueathfarnhamscheme.ie/wp-content/uploads/sites/10/2023/03/Chapter-7-Air-Quality.pdf>

Note that the air monitoring data collected and used for this study was collected over the first six months of 2020 which was during the strict COVID-19 lockdowns that rendered these roads almost entirely devoid of motor traffic for months at a time. This data is clearly totally unreliable as a base for modelling real and future projections upon.

Further, the traffic data that was supplied by the NYA for use in modelling was also 2020 data, again, this data is clearly totally unreliable as a base for modelling real and future projections upon. This applies both to any traffic modelling and such modelling that was used as a basis for environmental assessment.

*"A verification study was undertaken using the traffic data for the study area which was received from the NTA Eastern Regional Model (ERM) traffic model (See Section 7.2.4.1.2 and Chapter 6 (Traffic & Transport)) for year 2020"*

#### Alternative measures to deliver efficiencies

A number of low/no cost measures have been proposed by commentators making observations that suggest measures that can be introduced for existing bus services and routes to deliver a better service without the exceptional levels of expenditure that Bus Connects represents, particularly on these routes given the high level of land CPO and exceptional impact on general accessibility impacts for other road users.

The NTA seeks to dismiss these valid suggestions out of hand. Its 'go to' refuge to dismiss valid points is to refer the suggested measures to the NTA's collective concept mantra schedule of the constituent elements of the Bus Connect dream. Refer to 2.1.1.11 for the *Bus Connects Dublin is a suite of transformative changes to the bus system, intended to make it more efficient, faster, reliable and easier to use... the 9 essential ingredients.....*

In the real world it is simply evident that introduction of a measure such as cashless ticketing and/or smart ticketing could be introduced immediately and in general terms save half of the time to be gained from the aspirations of the Bus Connect proposal on this route. Considering the reduction in services the proposal represents with numerous bus stops being removed to create further time savings, the reality is that the huge cost this route plan will incur will provide the most minimal increase of time saving for a bus commuter that is fortunate enough to be able to get on a bus, or finds one to come when they need it. This Bus Connects scheme reduces the level of service to the commuter in response to an increasing population requiring public transport.

#### Inconsistency in NTA treatment of similar road sections

The NTA planning application proposed the addition of a dedicated cycle lane to replace shared cycle/bus lane inbound towards the city centre outside house nos. 51-71 Rathfarnham Road. This was observed as unnecessary and inconsistent with the most immediately comparable section of the same route (as well as many other sections); the inbound section of Rathfarnham Road on the south side of the Rathfarnham Road/ Dodder View Road junction has a shared cycle/bus lane for more than 50% of the route back to Rathfarnham village. There is not logical requirement for any land take from houses along the house nos. 51-71 Rathfarnham Road.

The NTA do not appear to have responded to explain this inconsistency of treatment of the roadway on either side of the junction in question. Hey refer to responses in sections 2.1.1. and 2.3.3, but we cannot see a direct response to the inconsistency and assertion that the cycle lane is required on the inbound section towards the city centre on the north of the junction.

#### Contravention of the Dublin City Development Plan zoning

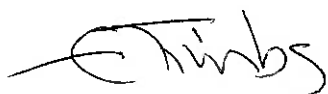
The NTA response acknowledges that the proposed set back of the front boundary wall and use of part of the existing front gardens of the houses on Rathfarnham Road for the widening of the road space,



is a material contravention of the development plan zoning objective. The houses plus gardens are zoned Z2 - Residential Neighbourhoods (Conservation Areas) The NTA response addresses how they would proceed to breach the Dublin City Development Plan and make good the remainder left after breach. It does not appear that this breach of the Dublin City Development Plan is considered subject to any consideration, is this correct?

The response document delivered by the NTA to ABP does not address the points of objection that I submitted to ABP in August 2023 adequately or indeed, not at all. I therefore enclose herewith my August 2023 submission as part of this letter of observation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Elaine Timbs', with a stylized flourish at the end.

Elaine Timbs

14 March 2024  
19-042/A/ER

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An Bórd Pleanála,  
64 Marlborough St.,  
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D01 V902

*Sent by Email to Client Only*

Dear Sirs/Madam,

**TEMPLEOGUE/RATHFARNHAM TO CITY CENTRE - CORE BUS CORRIDOR SCHEME**  
**REVIEW ON BEHALF OF #55, #59, #61, #63, #65, #67 & #71 RATHFARNHAM ROAD:**  
**AN BÓRD PLEANÁLA REFERENCE ABP-316272-23**

We previously prepared a submission to the NTA with regard to the impact of the proposed Bus Corridor Scheme on the above-referenced properties on Rathfarnham Road. A copy of the submission prepared by NRB is attached herein (Report dated 24<sup>th</sup> July 2023) for ease of reference.

We note the response now made to An Bórd Pleanála by the NTA. We reiterate our original assertion that one of the key issues affecting these properties is the potential breach of Part M regulations if the works are allowed to proceed as proposed.

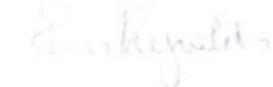
Additional information was sought from the NTA with specific dimensions, datums and cross sections, with this information requested on a 'before' and 'after' basis but this was not provided.

If there is no breach of Part M Regulations, as we believe there will be as set out in our submission of 24<sup>th</sup> July 2023, we suggest that it should be very easy for the NTA given their resources to unequivocally demonstrate same. They could easily provide **'before' and 'after' cross sections through the Residents properties from Rathfarnham Road to the boundary walls of each house clearly demonstrating Part M Compliance**. We are at a loss to understand why this was not provided by the NTA in the first instance, or formed part of the planning application, refer to the extract included below from our original submission:

***"We would suggest that a comprehensive consequential design for pedestrian and vehicular access from the public road to the door of each house, that meets the Part M requirements, should be provided demonstrating to An Bord Pleanála and each resident that this has been adequately addressed"***

We therefore request that ABP instruct, or request, the NTA to provide this information to these affected residents, as it is our considered opinion there may be a breach of the Part M regulations if proposals proceed as currently indicated in the current planning application.

Yours sincerely,



**Eoin Reynolds**  
**Chartered Engineer**  
**Director**

*Enclosure – Copy NRB Report dated 24<sup>th</sup> July 2023*



Bus Connects Submission

Bord Pleanála Case reference: HA29N.316272

Description: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

Case type: LA Road Dev - Application

Dublin City Council

**OBJECTION TO COMPUSLORY PURCHASE ORDER - Plot list 1073(1).1d and 1073(2).2d**

August 13<sup>th</sup> 2023

Submission made by:

Elaine Timbs

63 Rathfarnham Road

Terenure

Dublin 6w D6WYT96

Dear Sir / Madam,

I am submitting herewith my observations on the Templeogue/Rathfarnham to City Centre Bus Corridor scheme application by National Transport Authority ("NTA").

I am the owner of 63 Rathfarnham Road, a property affected by a compulsory purchase order for this application made by the National Transport Authority.

I fundamentally object to this Compulsory Purchase Order and planning application by the NTA.

I request that this planning application is subject to an Oral Hearing.

This submission is divided into four sections:

1. Objections and observations to the planning application and its proposed impact on my property and immediate residential environment,
2. Comment on the overall NTA process,
3. Observations on the overall route planning application,
4. Alternative suggestions.

Appended to this report are two consultants report prepared by RW Nolan planning consultants and NRB Consulting Engineers Ltd. These reports form part of this submission.

## **Section One - Observations to the planning application and its proposed impact on my property and immediate residential environment**

1. **ILLEGAL DEVELOPMENT - Mandatory Part M Building Regulations Violation:** Our property, a residential house at 63 Rathfarnham Road, Terenure will be impacted by this planning application through a compulsory purchase order ("CPO") that will remove 23.7m<sup>2</sup> from our front garden (Plot List 1073(1).1d, 1073(2).2d). We have requested specific detail and drawings on repeated occasions from the NTA and their agents clearly setting out levels and the impacts on our property and in particular our driveway and frontage. We sought drawings that would show the 'before and after' effect. None of this has been forthcoming and ultimately has been specifically denied to us.

However, through our further engagement with ARUP (engineers appointed by the NTA on the Bus Connects project) we were verbally advised by David Collins on 28 June, 2023 that such **detailed drawings (for our house) were prepared and were excluded from the planning application and that the NTA were not allowing these to be released.** This was recounted to Mr Collins in writing.

We engaged NRB Consulting Engineers Ltd ("NRB") who carried out a detailed topographical survey of the road section of Rathfarnham Road (spanning houses 55 to 71) to facilitate NRB preparing a review of the NTA planning application and its impacts to the affected houses. NRB commented on the *scant information included by the NTA in their planning submission*. NRB prepared an analysis based on the information available and their topographical survey to assess the impact of the planning application.

The NBR report is attached herewith and forms part of our submission.

**The NRB findings were that in relation to our house, number 63, the access gradient of the house would be significantly steeper (by an increase of 67% in gradient) as a result of the NTA proposed development in this application and therefore represents an illegal development due to contravention of PART M building regulations.**

**A significantly steeper gradient is the result for a further five houses and a steeper gradient for another house – six houses negatively affected in total making these dwellings less compliant than they previously were.**

We sought clarification and detail about the temporary CPO and works to be executed under Plot List 1073(2).2d), concerned that these proposed works would further exacerbate the increased gradient within the property, increasing even further the danger to users and potentially making the house inaccessible for vehicles and more dangerous on approach to the public road. No information was provided by the NTA.

**Our objection is made to this Part M breach on regarding our own house, number 63, and the other six houses affected.**

The matter of access gradients and Part M contraventions was raised in writing, supported by a professional assessment, with the NTA in April 2019 by a number of Rathfarnham Road residents.

This is not a mere omission or oversight. This all raises pressing and concerning questions regarding the NTA.

- Why would a national agency seek to proceed to carry out development that is dangerous to the public and illegal?
  - One way or the other there is a *significant question about the management and competency of the NTA*. Where else is such arbitrary and lawless judgment applied?
  - It raises concern about the modus operandi of the agency and its inclinations to pursue their agenda at any cost and wilfulness to withhold critically important information that pertains to safety (and illegality) from the public and from the legal owners of property they would wish to sequester.
2. **Town Planning:** We engaged RW Nolan & Associates planning consultants (“RW Nolan”) who carried out a detailed assessment of the planning application referencing in particular the section of the route from Rathfarnham village to Terenure village. Their report is attached herewith and should be considered as part of our submission and objection/ suggestion of alternatives that the NTA have omitted or ignored. These include:
- a. **No traffic modelling is included in the application documentation that shows the integrated effect of immediately adjacent and associated Bus Connects routes.** Considering the significant diversions, amendments to traffic routes and restrictions to private traffic, it is beyond comprehension how comprehensive traffic modelling is not a critical part of the application.
  - b. The NTA have chosen to seek planning approval for a series of bus routes on an individual basis for each route. This is done in absolute isolation of any other route, even those routes that are immediately adjacent and/or intersecting. **The result is that the reality of these delivered schemes (as applied for by the NTA) will, in terms of traffic and the environmental impacts, be completely underestimated and irreversibly damaging to the environment.**

All through the consultation process the NTA has repeatedly committed to producing detailed traffic modelling information and always deferred to the next stage of the process for it (and environmental assessment); this is another instance of how the NTA have misled and misinformed the public and local property owners affected by their proposal. It is unacceptable that the National Transport Authority would not produce comprehensive traffic modelling guidance for the post implementation of their sizeable and visibly cross-impacting planning applications for the west and south-west of the city.

It is patently clear that the proposed traffic redirections/restrictions and diversions through the west and south-west of the suburban city will cause material rerouting of large volumes of traffic onto roads and streets that were not designed to take anything more than local residential traffic, or already operating at full capacity.

The obvious result is that these ignored diversions and resultant confluences of traffic and gridlock will have an intensely adverse impact on the environment in localised areas along the planning routes and adjacent and contributory routes not included on the planning application route maps. Springfield Avenue/Dodder View Road is a typical example. At Phase II the NTA dropped a cycle route from Rathfarnham village

through Brookvale and Brookvale Downs to cross Dodder View Road (and the Dodder river) into Rathdown Park. When questioned the NTA said this was dropped due to environmental impact concerns (crossing the Dodder river) but refused to explain these reasons or expand. Of course, the expectations were that the decision to remove this very safe cycle route that would deliver cyclists to the very much quietened Templeogue Road from the NTA's preferred route status was the NTA's acquiescence as a result of lobbying. In any event *it very much clashes with the eventuality this current planning application will present to the 1.8km stretch of the Dodder River and Bushy Park where the redirect traffic from the Kimmage to City Centre, Tallaght to City Centre routes will now divert to – this will become the most heavily laden road section per traffic lane in greater Dublin.* Yet the NTA do not see or consider this. The NTA are happy to submit environmental assessment reports to An Bord Pleanála in a statutory process that asserts that the planning application and resultant traffic diversion and management will have no environmental impact??

Is this simplistic and detached approach to assessment and compliance with State and EU legislation on environmental protection really acceptable? Will this binary tunnel vision version of shape shifting be accepted as just consideration by An Bord Pleanála?

- c. **The introduction of the signal-controlled priority measures that are proposed for junctions with Dodder Park Road and Rathdown Park, only 260m apart, are likely to lead to significant traffic congestion while the need for both priority measures is not made clear.** The signal-controlled priority measure at Rathdown Park should be removed, see RW Nolan report sections 4.1 and 4.2.
- d. The application proposes the addition of a dedicated cycle lane to replace shared cycle/bus lane inbound towards the city centre outside house nos. 51-71 Rathfarnham Road. **This is unnecessary and inconsistent with the most immediately comparable section of the same route** (as well as many other sections); the inbound section of Rathfarnham Road on the south side of the Rathfarnham Road/ Dodder View Road junction has a shared cycle/bus lane for more than 50% of the route back to Rathfarnham village. There is not logical requirement for any land take from houses along the house nos. 51-71 Rathfarnham Road.
- e. The NTA have proposed amending the width of the footpath to between 2.35m and 2.9m in front of the houses nos. 51-71 Rathfarnham Road section. In contrast the NTA determines 1.8m to be adequate width for the footpath at Rathfarnham village, see map 3 in Appendix-B4-Typical-Cross-Sections.pdf (which experiences far more footfall). **The footpath widths should be consistent and not unnecessarily large.**
- f. **The proposed set back of the front boundary wall and use of part of the existing front gardens of the houses on Rathfarnham Road for the widening of the road space, appears to be in material contravention of the development plan zoning objective.** The houses plus gardens are zoned Z2 - Residential Neighbourhoods (Conservation Areas). The proposed widening of the road space along the fronts of the houses nos. 51-71 would therefore be a material contravention of the Dublin City Development Plan.
- g. The NTA has provided detailed information on the process to remove trees from the houses along the nos. 51-71 Rathfarnham Road section, but there is no detail of any sort provided on replacement and replanting of these trees, many of which are unique and irreplaceable.

- h. **We are deeply concerned in relation to health risks presented by the proposed widening of Rathfarnham Road and bring vehicular closer to our home at 63 Rathfarnham Road, Terenure.** We are further concerned at the immense increase in traffic volumes that will be diverted to Rathfarnham Road and delayed in grid-lock at all times of the day. We refer to the very well documented evidence on carcinogenic airborne matter including nitrogen oxides, particles, carbon monoxide and hydrocarbons as well as fine friction particles that are here to stay, even as electric vehicles become more popular. The often underestimated by public policies and regulations, fine particles include those in exhaust fumes that are generated by fuel combustion and fine friction particles that are a result of tyre and brake wear and tear. They are a major health risk causing oxidative stress, respiratory or cardiovascular disorders, cancers, neurodegenerative diseases (Parkinson, Alzheimer), etc. <https://www.theguardian.com/environment/2022/jun/03/car-tyres-produce-more-particle-pollution-than-exhausts-tests-show>

## **Section Two: Comment on the flawed NTA process:**

- 1. Flawed public consultation, which proved to be completely inadequate:** I believe that there was a very blatant attempt by the NTA to railroad the proposals through with minimum meaningful consultation possible. The NTA used the Covid 19 pandemic to their advantage and continued with a pretence of engagement by offering Zoom calls. A significant proportion of the affected residents, many in older demographics, who are less computer savvy, simply did not know how to engage with Zoom or the online documentation and as a result were excluded. For anyone seeking hard copies of the detailed documents, the cost of over €600 would be prohibitive. Without in person group meetings, ideas could not be shared, discussed and fleshed out.
- 2. NTA had a deliberate “Divide and Conquer” approach to its “individual” meetings.** The NTA would not agree to group meetings with various combinations of residents’ associations. I believe that this was a deliberate strategy of the NTA to divide and conquer and the result was that concessions and changes to the original plan were granted to the vocal and more powerful residential areas. This does not represent a result for the “greater good”.
- 3. NTA team creating the plan lack the necessary expertise:** The NTA proposals were compiled by engineers, noticeably absent are any town planners or architects which is an obvious deficit in expertise and has resulted in a less than rounded set of proposals.
- 4. Proposals are presented in a manner that is inaccessible to the common “layman”:** The documents run to hundreds of pages. Residents, even those affected by CPO were not offered the means to access independent engineering or town planning advice. So, unless individuals have the financial means to fund this privately, they were at a disadvantage versus the state funded juggernaut of the NTA.
- 5. The NTA proposals 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.
- 6. Under the Aarhus Convention,** members of the public have a right to participate in a range of decisions where these may be an environmental impact. I do not believe that the NTA have

come close to fulfilling their requirements, which leaves this entire process open to a legal appeal.

- 7. Deliberate lack of engagement of expert groups** by the NTA: there was no engagement with Dublin City Council, or South Dublin City Council. Even more strikingly no engagement with the Dublin Bus drivers, who surely must have the practical expertise in this area?!
- 8. Well-grounded concerns and objectives were dismissed by the NTA: for example, the proposals at the main junction in Terenure.** Today when driving from Rathfarnham Road, there is no right turn at the junction to bring you to Terenure Road East. That is simply because of the danger it poses, there is no room for large vehicles lorries or buses to take this tight turn. Also, pedestrians cross the road at this point, as they carry out their village life, further increasing the danger on both vehicle drivers and pedestrians.
- 9. The NTA has had the benefit of direct access to An Bord Pleanala over months and years for pre Planning meetings and consultations.** By stark contrast , the public were afforded an eight week period to access, interpret and respond. Moreover the contents and notes from the Pre-planning consultations are withheld until after the planning decision is handed down. This again denies the citizen the relevant and timely information to make an informed submission.
- 10. There is no transparency or clarity on how An Bord Pleanala will review and determine judgement on the observations/ applications.** There is no understanding on how many aspects have been pre agreed between the NTA and An Bord Pleanala.

### Section Three: Observations of the inadequacies of the proposals more generally.

1. The suggested “benefits” are deliberately misleading:

The scheme is proposed on the basis of **time savings of 6 minutes in the am in 2028 and 2 minutes in the pm, decreasing to 4 minutes in am 2043 and 1 minute in pm!** (see Environmental Report, chapter 6, page 136)

**Table 6.52: A2 Service Bus Average Journey Times (Inbound Direction)**

Peak Hour	Do Minimum (minutes)	Do Something (minutes)	Difference (minutes)
2028 AM	35.2	29.4	-5.8
2028 PM	31.1	29.1	-2.0
2043 AM	33.2	29.3	-3.9
2043 PM	30.7	29.3	-1.4

However, assessment of the details of the sources of time savings show that **the greater majority of expected time savings do not come from the measures being proposed in the planning application – significant time savings can be achieved at little or no cost.**

- a. The NTA themselves have said **50% of the time savings is the move to “Cashless buses”.** I completely agree with this cashless bus proposals and this should be



implemented immediately and separately, not cleverly rolled by the NTA into an overall "time" savings that it is using to justify a Euro 2Billion capital expenditure project.

- b. A considerable number of **bus stops will be removed** per the proposal, so that will reduce the travel time inevitably. Again, why are the NTA rolling that time savings into the overall times that they are using to railroad this significant construction project through?
- c. The NTA themselves have noted that time savings will come from implementing **bus priority signalling**. Why did the NTA not listen to suggestions to **trial that approach** and understand the benefits in a real-world scenario, before proceeding with the massive road programme?
- d. The NTA **needs to clearly share the breakdown of the €2billion spend** into various time savings that will be delivered. It is already understood that the overall level of service will be reduced by Bus Connects. I believe that without a, b, and c above **there is very little justification for the colossal capital expenditure, hence it is at best 'convenient' for the NTA not to clearly demonstrate the analysis!**
- e. The reduced time savings in 2043 per the NTA's own estimations, also demonstrates that this proposal is not built for the long term, with the increased population growth. This contradicts the NTA's assertions that they are planning for the future.

## 2. Lack of Traffic modelling and the negative Environment impact:

- a. **Traffic modelling that is noted in the document is flawed. The impact of Covid 19 on society, and developments in hybrid working** has completely shifted the landscape and requirements for commuting, vehicular access and peak congestion timings.
- b. The application states no impact based on consideration of the entire route scheme (start to finish) but has very **deliberately not been considered any localised impacts** that will unavoidably arise in sections where massive increases in traffic and congestion will arise to the detriment of residents living along those areas brought closer to by road amendments.
- c. The application **does not consider the parallel Bus Connects route applications** for adjacent areas that are being made (Kimmage to City Centre, Tallaght to City Centre) and therefore discounts and ignores the inevitable resulting traffic redirection and congestion that will occur. Consideration by inclusion of these critical factors would have an enormous impact on environmental impact assessment. There is a particularly huge impact arising from the applications along Springfield Avenue/ Dodder View Road and northwards on Rathfarnham Road from Pierse Bridge.

The NTA are the National Authority for transport planning; they above any other body should be cognisant of these parallel and connected proposed amendments. The NTA fully understand the implications and integrated and knock-on aspects these three routes/corridors whereby the proposals all impact on each other. It is simply unacceptable on a number of levels that NTA would wilfully dislocate these vital considerations on environment to serve their base purpose.

## 3. Negative Environmental impact on Natural surrounds

- a. All along the route there will be loss of a **significant volume of mature trees**, which is disappointing from aesthetic and environmental stances. Concerns for the impact of

the **sensitive and threatened bat population** in the Pearse Bridge area have been ignored.

- b. **There will be increased noise and air pollution from cars and lorries** that will inevitably be queuing on “quiet roads”.
  - c. The reality of this proposal is while savings are assumed from “bus only” lanes, the reality will be very different with lane blockages arising from lorries, trucks etc that will be parking to deliver packages, stock etc
4. **Lack of consideration for Local Residents living in urban villages:** The NTA is proposing 12 “bus corridors” that run from periphery points directly into the city centre. There is no proposal for cross radial routes, connecting suburb villages efficiently. There is absolutely no consideration that citizens will in reality want to cross from suburb to suburb, village to village to manage their daily lives of getting to school, to the shops, dentist or doctor, etc. The proposed schemes will eliminate some of these routes as they exist today. The NTA assumption/ suggestion is that citizens will take 2 or 3 buses to reach their destination. In reality, these citizens will have no real alternative but to drive their cars, thereby increasing congestion, gridlock and pollution.
5. **There is a huge and unfair disparity in the treatment of different roads** that is unjustified in the documents.
- a. For example, on Templeogue Road from Terenure College to Terenure village will be closed to all vehicles except buses 24/7. The reality of this decision, is that traffic coming from the M50 Spawell junction, intending to access the city, will be forced to turn right at Templeogue Road the Templeogue junction to continue along Springfield Avenue/Dodder View Road and to turn left on Rathfarnham Road. This will ensure Rathfarnham road is a grid-locked bottleneck while Templeogue Road is left virtually idle for most of any given day. **This is an unbalanced and unjustifiable concentration of all private traffic onto Rathfarnham Road.**

#### 6. **Detrimental impact on heritage, environment and village/community fabric**

The Department of Housing, Planning and Local Government’s Design Manual for Urban Streets 2019 (DMURS), sets out the modern, sustainable approach to treatment of urban streets. It highlights how urban street design should shift from the conventional traffic conduit approach and should instead be framed by viewing the street as a place with a social function, putting sustainability, multimodal movement, pedestrians and accessibility at the heart of street design. The proposals presented for high volume highways are wholly inappropriate for the mature suburban landscape environments that it is proposed Bus Connects Core Corridor 12 is to be foisted upon. There is important heritage in the streetscape of Rathfarnham Road, Terenure and Rathgar which will be ruined by the proposed high volumes implications. **House numbers 51,53,55,57,59,61,63,65,67,69,71 which face directly onto Rathfarnham Road, are part of a 1920’s much feted development of “Stringer” houses unique in the character of the Arts and Crafts style. The style and placement on site are very much part of the heritage of that era in the early part of the state’s history and should be preserved and protected.** Pearse Bridge (constructed circa 1790-1810) is a single arch bridge which again is worthy of protection for future generations. There is a commemorative bronze plaque depicting the Pearse Brothers from 1952. Similarly, the Memorial Hall, in Terenure village is a protected

structure that should be respected and safeguarded, however the NTA proposal is to further reduce to frontage to the road.

The proposed road widening will destroy the irreplaceable historical streetscape, fabric and character of Terenure and Rathgar and will breach the objectives of Dublin City Council Development Plan with regard to our built heritage (Chapter 11, Built Heritage and Culture).

Terenure Road East has an historical streetscape with houses originating from mid 19<sup>th</sup> century. Current proposals for Terenure Road East will impact properties, many of which are listed on Dublin City Council's Record of Protected Structures. Destruction of protected curtilage comprising of historical cut stone and old brick walls, pillars and railings is totally unjustified and unacceptable. Cllr Deirdre Conroy (architectural heritage specialist) made formal submissions on the above in the original heritage submission in April 2020.

7. The **commercial impact on the Rathfarnham, Terenure, Rathgar and Rathmines villages will be devastating**. Local traders and businesses would be detrimentally impacted from the loss of on street parking, loading areas and local access. Consumers would be forced to take their custom to more accessible areas (travelling further) and the small village shops and service providers, such as medical practitioners, which make up the heart of village communities, would disappear and the integral community aspect would unavoidably die, causing dereliction. This is in direct conflict with the Dublin City Development plan 2016-2023.
8. The proposal for Core Corridor 12 would **force private traffic onto secondary roads and into housing estates, which will create gridlock that will ensure private vehicle drivers will seek "rat runs" as alternatives to the arterial routes**, ruining all surrounding residential developments and again destroying the fabric of the communities in these housing estates. This alternation of routing for private vehicles will create distinctly unsafe road situations for residential roads that were never designed to carry traffic of the magnitude that will be channelled onto them. Gridlock will result throughout all areas of these residential communities.

The wider and interconnected traffic impacts of the various Core Corridor proposals have not been properly considered or modelled and in many key areas the actual effect will in fact be to slow the junctions on the corridor routes. For example, the proposed "no through" traffic along Templeogue Road to Terenure Village and the change to allow a right turn to be opened to traffic from M50/Templeogue on to Springfield Avenue will push all the eastbound traffic which previously used Templeogue Road onto Rathfarnham Road. Therefore, Rathfarnham Road will become stifled with traffic, jamming the Terenure Cross junction where all buses, private vehicles and cyclists converge to attempt to access Terenure Road East, competing with pedestrians making their way to the numerous schools and churches in the immediate area. **There should be no left turn allowed from Springfield Avenue/ Dodder View Road on to Rathfarnham Road** in the event this fundamentally flawed route plan is implemented.

9. **The lack of any "Park and Rides" proposals in the scheme will ensure that the private motor vehicle reduction is impossible.** The objective of "bus corridors" is to reduce the volume of vehicles by providing an alternative bus option. Today, there is significant volume of traffic from commuters coming from the M50 and surrounding ring roads. To be able to avail of the bus option, these commuters need a location to safely leave their cars. Therefore, it makes no

sense that “park and rides” are not being planned and implemented as part of this overall proposal. During the NTA consultation process, the NTA themselves asserted that none of the bus route schemes could be implemented without first providing “Park and Ride” facilities.

10. **The NTA’s stated objective is to reduce private cars on these main routes into town.** The NTA proudly boast that there will ultimately be a reduced bus service. Today, at peak timings in the morning and evening, buses will pass Terenure village “full”. With further vehicle restriction, if the NTA objective is achieved, the buses will be “full” earlier in the journey. Hence, the residents in areas like Terenure will not be able to avail of the bus option, and therefore will have no way of accessing the city.
11. The NTA presents the scheme as being for the “greater good”. In that the NTA places the provision of commuter services to those living in outer periphery areas of the city above and ahead of the rights and entitlements of those living in the inner areas of the city. No citizen has a greater or lesser right than another despite the NTAs project objectives.

#### **12. Implications on Cyclists Safety**

The Bus Connects proposals for cyclist, in general, will be chaotic and dangerous. Cycle lanes also appear to pulse in and out of the proposed route, inconsistently offering cyclists a reserved route. This is the NTA suggesting to design for cyclists in name only, but are actually failing to design for safe cycling for all ages and abilities. There’s little point having segregated cycle paths only for that segregation to end randomly where buses are pulling in or the road pinches to force all users into the same lanes. Why are cyclists not segregated entirely on alternative, parallel routes, where theft will not need to vie with vehicular traffic and tailpipe fumes?

13. **Bus Connects has not considered the convenience or the safety of Pedestrians.** Pedestrians should not have to attempt to cross at signalled junctions unaided. The NTA assume time savings to justify the route amendments will in reality be severely diminished when the all of the necessary Toucan and pedestrian light crossings are added in a variety of points along the entire route.

#### **14. Alternative solutions with more favourable environmental and economic impacts were not given due review i.e. the Metro!**

The obvious strategic solution to the projected growth in south Dublin population is undoubtedly an **underground metro network**. Instead however, the NTA proposes to spend incredible amounts of taxpayer’s money (unquantifiable by the NTA at this point) in a substantial road development. This is caveman philosophy in dynamically changing times for transportation and health considerations. The NTA’s own publications show the vastly superior and desirable preference of rail-based transport over bus and road transport options. The NTA for years refused funding to Dublin Bus to acquire hybrid buses. Refusal was justified on financial grounds previously. Still critical factors remain regarding these vehicles: -

- They are incredibly costly, €400k-€500k each. Dublin Bus has an existing fleet of 1,100 diesel buses. The NTA refuses to give financial data on the life cycle, running cost and replacement cost of this fleet. Replacing this existing fleet would cost somewhere between € 330 million and € 550 million. Not to mention the additional equipment they require. Moreover, this fleet

- would need to increase materially to service the population expansion the NTA justify Bus Connects upon (increased demand of 25% promised). These costs would therefore increase.
- It is a fallacy to think diesel hybrid buses have a genuine environmental improvement to offer. Their construction, servicing and disposal alone is arguably unjustifiable and their running efficiency gain is negligible. Additionally, fuel costs have increased dramatically recently.
  - Irrespective of the deployment of diesel hybrid buses, or the long run lifecycle of existing of 100% diesel buses on the fleet, they emit diesel exhaust fumes that cause cancer. The World Health Organization's (WHO) International Agency for Research on Cancer (IARC), a panel of experts that co-ordinates and conducts research into the causes of cancer and develops cancer control strategies specifies that exposure to diesel fumes causes lung cancer. Categorising diesel engine exhaust fumes as 'carcinogenic' Group 1, which is used when a substance causes cancer in humans. The NTA is proposing a colossal state infrastructural spending scheme in Bus Connects that will increase and prolong for decades, the use, and increased use, of diesel buses on the city streets, bring these buses closer to homes and to channel cyclists into unavoidably breathing these fumes at close proximity. This is an incredibly irresponsible and ill-conceived strategy not just for transport but for public health.

15. There is no evidence to support the assertion that the NTA's costings (at € 2billion) are even a vaguely accurate estimation of potential costs.

If one looks at the CPO budgets in isolation, it seems wholly unrealistic. An authoritative independent cost/benefit analysis is undoubtedly required to understand if the current NTA proposal represents good value for money for the taxpayer. This actual cost of the implementation of Bus Connects has to **be considered against a metro system** assessed on the same criteria. Bus connects represents a fundamental strategic decision that positions Dublin's public transport as wholly and solely "bus-centric" given the massive sums of public spending this infrastructure would demand and therefore commit the city's public transportation to.

Separately the NTA responded to an enquiry by Eamon Ryan TD to confirm their estimation that CO2 emissions for transport in Dublin will increase by 30% to 2030, while the government is obliged to reduce emissions by 30% over this timeframe – a negative swing on emissions of 60% on today's emissions levels. It is staggering how the NTA can contemplate their current proposals in the face of these unavoidable environmental challenges to Ireland. **Underground Metro is the only solution.**

#### **Section 4: Alternatives that should be considered:**

- Metro – as noted by our NRB engineers "Nonetheless given the likely huge cost, disruption, limited benefits and the environmental effects, we are surprised that an underground alternative to a Bus Corridor does not appear as being vigorously pursued by the NTA (see attached NBR consulting document)
- Intelligent Bus priority signalling at all junctions
- Deploying more buses at peak times on the existing bus routes
- Implement cashless fares on buses first, before any construction works are considered or approved
- Introduction of city centre congestion charges

- Manage and police current road usage rules, for example severe fines for vehicles blocking bus lanes or parked on double yellow lines
- Counter flow initiatives, and independent traffic management consultants to look at traffic flow in the city
- Safe off route cycle lanes for cyclists of all abilities including families with children
- Retain independent traffic management consultants to look at traffic flows in the city, in particular at traffic light synchronization.
- Establish free park and ride facilities immediately to encourage commuters to use public transport
- Introduce a free bus service to encourage private transport commuters to switch, as was introduced in Luxembourg in 2020. Cost would be offset for the nation by reducing the EU fines paid for currently exceeded emissions targets.

## Conclusion

The substantial, costly and devastating infrastructure changes that the NTA is seeking along these routes remain unjustifiable. No cost and low-cost improvements have not been considered and are certainly not offered to the public. The preference is clearly to embark on a substantial infrastructural build to enshrine public transport vehicles that are noxious polluters for generations to come.

The Bus Connects process is being railroaded without any apparent consideration of the environment aspect, health implications or community destruction. The NTA spend liberally on select media advertising but chose not to spend commensurate sums on advertising to make residents and commuters in affected areas aware (some newly affected) of the proposed routes and the implications.

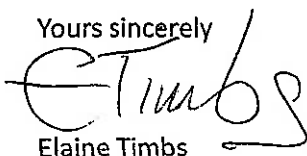
This ill-conceived corridor 12 proposal needs to be abandoned and a cost benefit analysis of an underground Metro from Charlemont to Knocklyon needs to be properly and honestly evaluated.

The assessment and planning of the bus routes for the city must take cognisance of the needs and wishes of all commuters and citizens along the proposed routes, not just those at the outermost extremities. The needs and preferences of all citizens must be considered equally.

In conclusion, I **fundamentally disagree with and object to the proposals** and I am **requesting an oral hearing** to enable An Bord Pleanála to truly understand the depth of concern and objection with the current plans and the impacts on the individual residents and businesses in South and West Dublin.

The NTA has come across as a law unto its-self that is simply steam rolling its way through to its objectives. There has been no meaningful engagement during consultation and the result has been that the NTA have managed successfully to limit opposition.

Yours sincerely

A handwritten signature in black ink, appearing to read 'ETimbs', with a long, sweeping underline that extends to the right.

Elaine Timbs