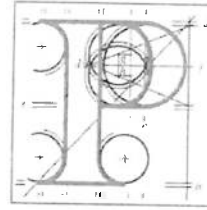


Our Case Number: ABP-316828-23



**An
Bord
Pleanála**

Recorder's Resident's Association
c/o Pauline Foster
39 Whitehall Road
Terenure
Dublin 12

Date: 03 April 2024

Re: Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.
Tallaght/Clondalkin to Dublin City.

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned proposed road development. The contents of your letter have been noted.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

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

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

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

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

Lauren Griffin

From: Lauren Griffin
Sent: Wednesday 3 April 2024 12:09
To: Laurence Foster
Subject: RE: Recorders Residents Association - Submission re Tallaght/Clondalkin CBC Scheme. Case Ref: 316828 -23

A Chara,

The Board acknowledges receipt of this email, official acknowledgment will issue in due course.

Kind regards,

Lauren

From: Laurence Foster <laurencefoster2482@hotmail.com>
Sent: Tuesday, April 2, 2024 4:13 PM
To: LAPS <laps@pleanala.ie>; Eimear Reilly <e.reilly@pleanala.ie>
Subject: Recorders Residents Association - Submission re Tallaght/Clondalkin CBC Scheme. Case Ref: 316828 -23

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Eimear,

Please find attached the Recorders Submission on the Tallaght/Clondalkin CBC Scheme.

Best regards,
Pauline

Pauline Foster,
Chairman,
Recorders Residents Association.
Ph. 455 5946

RECORDER'S RESIDENT'S ASSOCIATION
[Representing Whitehall Road, Gardens, Park, Close, Glendale Park & Priory Walk, Way & Hall.]
39 Whitehall Road,
Terenure,
Dublin 12.

Tallaght/Clondalkin to City Centre BusConnects Core Bus Corridor Scheme.

Executive Summary:

Our response to NTA response to our Submission No: 274 your ref: 2.8.5.2.

Whilst we broadly welcome the BusConnects Scheme we find ourselves in a very difficult situation and seek to deal with issues that can be remedied whilst still in the planning stages.

We deal with the supplementary submission in the following order:

INTRODUCTION.

1. DECISION RE ORAL HEARING.

2. THE FACTS WHICH CHARACTERISE OUR AREA:

3. A THEORY OF BUSCONNECTS.

The projected reality for the area.

4. ALTERNATIVE MODES OF TRANSPORT.

5. DISTANCE BETWEEN BUS STOPS.

6. CITY EDGE PROPOSAL:

Pages 8/9. Appendix 1.

Page 10. THE STREATHAM SCENARIO.

RECORDER'S RESIDENT'S ASSOCIATION
[Representing Whitehall Road, Gardens, Park, Close, Glendale Park & Priory Walk, Way & Hall.]
39 Whitehall Road,
Terenure,
Dublin 12.

The Secretary,
An Bord Pleanála,
Marlborough Street,
Dublin 1.

30th March 2024.

RECORDER'S RESIDENT'S ASSOCIATION
STRATEGIC INFRASTRUCTURAL DEVELOPMENT.
An Bord Pleanála REF: 316828 – 23 Tallaght Clondalkin BusConnects.
SUPPLEMENTARY SUBMISSION RE Tallaght Clondalkin to City Centre Bus Connects Core Bus
Corridor Scheme.

Dear Sir/Madam,

INTRODUCTION:

The Recorders Residents Association, representing 365 homes, wish to make the following Supplementary Submission on the Tallaght Clondalkin Bus Corridor also known as the 'D' Corridor or Corridor 9. We comment on the NTA's response to our previous submission no: 274 – NTA ref: 2.8.5.2 and note their apparent misconstrued focus on the 'cumulative impact of all 12 corridors' which was not our intended point. Our main focus was and still is the traffic displacement ingenerated by 3 corridors in such close proximity to each other.

On the map below there are two other places where corridors are close – in each case they are along major National routes, N11 and N4. There is no comparison to the road network encompassing the Templeogue/Terenure – Kimmage – and Tallaght/Clondalkin corridors. We will reference these corridors within this document as A, F & D in accordance with the bus routes which will run on them.

As part of our Supplementary Submission we will reference material researched over the past 5 years by the Metro South West Group of which we are a founding member. Furthermore, having studied Dublin Bus and Rail services and road systems in depth over these past 5 years, aided by our long history of local knowledge, lends weight to what we have to say.

1. DECISION RE ORAL HEARING –

The unique nature of the three core corridors, in an area with NO auxiliary public rail transport, warrants such a hearing.

In response to your letter from Eimear Reilly, dated 26th February we wish to state that we are extremely disappointed that the Bord has decided to adjudicate both Templeogue/Rathfarnham CBC and this application without holding an oral hearing. No doubt the same outcome will result re the Kimmage CBC.

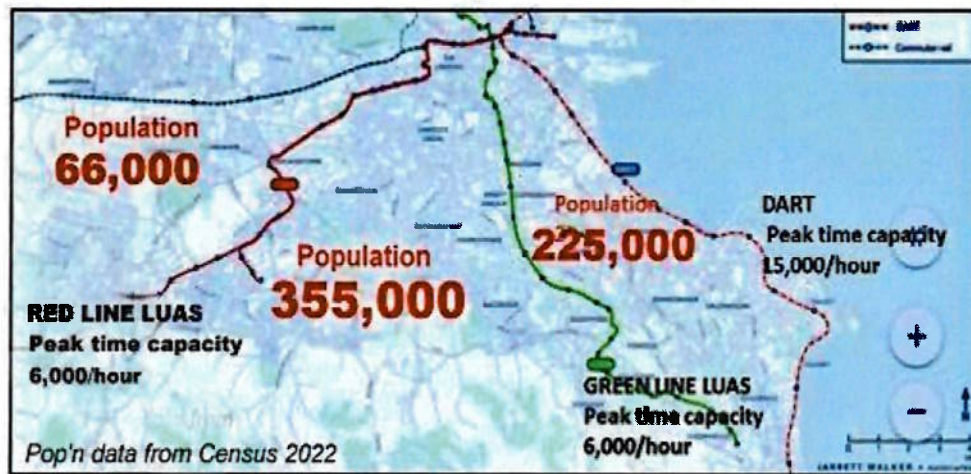
The *unique* nature of these three core corridors was comprehensively laid out in our previous submission – i.e, our Observation 3: The cumulative effect of displaced General Traffic from *three Corridors into a significantly small space/area.*

NTA have chosen to ignore the main thrust of our argument which is, that the closure of so many sections of the 3 corridors in question will displace an unprecedented number of vehicles onto adjoining roads, concentrated into an extremely small area. The greater factor is that the planned provision of Public Transport for this 3 x Corridor, *Cumulative area*, needs a unique method of consultation – i.e., An Oral Hearing.

2. THE FACTS WHICH CHARACTERISE OUR AREA: map below.



The need for sustainable public transport in SW Dublin



Narrow streets on bus corridors in SW Dublin: only metro can deliver capacity and speed

2

The Population of the area in which we live is **355,000** and is framed by the Red and Green Luas Lines. With the exception of the 'fringe' of the area...

- It has no main-line rail or Luas services and
- It's carriageways are for the most part, narrow two way roads that wend their way through small historical villages and
- is entirely dependent on buses for all our Public Transport.

By comparison, the population to the west has 66,000 and is served on it's fringe by

- the Red Luas Line,
- the N4 Motorway,
- The Dublin-Maynooth-Sligo Railway Line and the
- Dublin-Heuston-Kildare-Cork/Waterford Railway Line.

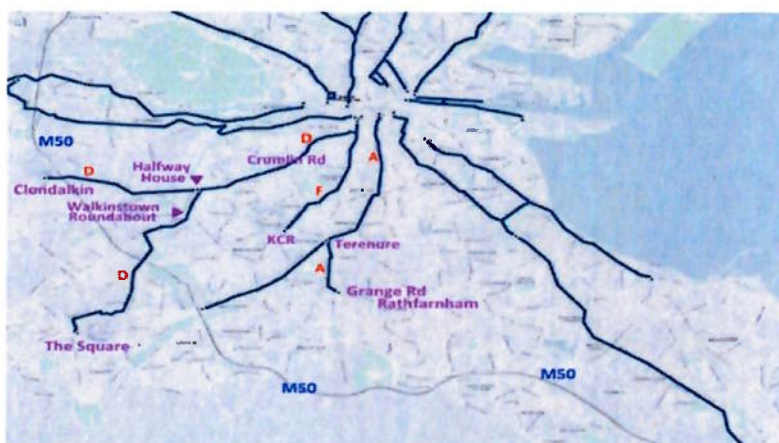
Equally, the population to the east has 225,000 and is served on it's two fringes by

- The Green Line Luas and
- The Coastal DART.
- And the N11 motorway.

Some Local Statistics:

75% of commuters in Knocklyon travel by car and only 11% travel by bus. A similar percentage is true of the Firhouse area. Only 12% of the commuters in the Willington area travel by bus and 71% travel by car or van.

The map below shows the 3 BusConnects Corridors, the A Corridor (Templeogue/Rathfarnham CBC) The F Corridor (Kimmage – City Centre CBC) and The D Corridor – Tallaght/Clondalkin CBC. We note their proximity to each other within the south western portion of our area.



The following table shows that the total in-bound public transport capacity in South East Dublin amounts to 24,600.

**Table 2.3.1 Public Transport Capacity Peak Hour (7-8am) In-bound
Dublin South East vs Dublin South West**

| Mode | Dublin South East Capacity | Dublin South West Capacity |
|------------------------------------|----------------------------|----------------------------|
| DART: feasible capacity | 15,000 | 0 |
| Luas Green Line: feasible capacity | 6,000 | 0 |
| Buses: actual provision | 3,600 ^a | 5,680 ^b |
| Total | 24,600 | 5,680 |

^a At the entrance to Donnybrook Road: 1x116; 1x118; 7x145; 3x155; 4x39a; 7x46a; 1x46e; 3x7b; 1x7d; 3x84 = 31 buses.
 On Merrion Road, at the junction with Ailesbury Road: 5x4; 2x7; 2x7a = 9 buses.
 On Sandford Road at Gonzaga College: 3x11; 1x44; 1x61 = 5 buses.
 The capacity of each bus is taken as 80 passengers.
 On Kimmage Rd Lower, at Mount Argus: 3X54a; 6X9 = 9 buses.
 On Templeogue Road, at Terenure College: 12X15; 4X49; 2X65; 1X65b = 19 buses.
 On Rathfarnham Road, at junction with Rathdown Park: 6X15b; 6X16 = 12 buses.
 On Crumlin Road, at Children’s Hospital: 6X27; 1X56a; 5X77a; 1X77c; 6X123; 4X151 = 23 buses.
 On Terenure Road West, at the Presentation School: 4X15a = 4 buses.
 On Clogher Road, at St Bernadette’s Church: 4X150 = 4 buses.

In contrast, South West Dublin has only buses. From Table 2.3.1, it can be seen that South West Dublin has less than a quarter of the public transport capacity as South East Dublin.

We do not have a break-down of the Public Transport figures for the Lucan area population of 66.000. Suffice, though to say, that in the east and the west of Dublin, due to the added factor of their rail provision, it is highly likely that BusConnects will add greatly to climate action by encouraging far more people to opt for, what could be considered, reasonably good public transport.

3. A THEORY OF BUSCONNECTS - *The Core Bus Corridor schemes are seen to enable significant improvements in People Movement by sustainable modes along the direct Core Bus Corridor routes, particularly by bus and cycling, with reductions in car mode share due to the enhanced sustainable mode provision*

SOME FACTS:

3.1 The most striking thing to emerge from the data, is the extremely limited ambition of *Busconnects* for South West Dublin, the number of buses increasing by only 7, i.e. from 63 to 70, and the number of passengers increasing by 560.

BusConnects for buses by Jarret Walker

| Bus corridor | Current | Current | <i>BusConnects</i> | <i>BusConnects</i> |
|--|--|--------------------|---|--------------------|
| | No. of Buses | Passenger Capacity | No. of Buses | Passenger Capacity |
| Kimmage-City Centre (at Mount Argus) | 9 (3X54a; 6X9) | 720 | 18 (6XF1; 6XF2; 6XF3) | 1,440 |
| Templeogue-Terenure (at Terenure College) | 19 (12X15; 4X49; 2X65; 1X65b) | 1,520 | 10 (5XA1; 5XA3) | 800 |
| Rathfarnham-City Centre (at junction with Rathdown Park) | 12 (6X15b; 6X16) | 960 | 18 (5XA2; 5XA4; plus 2X74; 6X85) | 1,440 |
| Greenhills-City Centre (at Crumlin Hospital) | 23 (6X27; 1X56a; 5X77a; 1X77x; 6X123; 4X151) | 1,840 | 24 (4XD1; 4XD2; 4XD3; 2XD4; 2XD5 plus 2X72; 6X73) | 1,920 |
| Totals | 63 | 5,040 | 70 | 5,600 |

Current frequencies are taken from the current on-line bus timetable at June 2020; under normal running, each bus has an assumed capacity of 80 passengers.

Frequencies under *BusConnects* are taken from *Dublin Area Bus Network Redesign Revised Proposal*, Jarrett Walker and Associates, October 2019¹.

3.2 Could this very small increase of 7 buses facilitate thousands of commuters in South West Dublin to leave the car at home? Could this be consistent with public transport policy, whereby public transport capacity in South West Dublin would have to almost treble to enable it to reach the official target for the Greater Dublin Area of having 23% of trips on public transport? As commuting – to work college and school – is the single largest source of trips, it is clear that a substantial increase in public transport for commuting is required. This increased demand for public transport would not be met by the *BusConnects* proposal.

3.3 Our reasoning behind this debate is surely clear by now. The deficit of public transport means, that for this area, the dependency on the car will remain. The cumulative impact of dis-placed traffic from the Templeogue Road, Lr. Kimmage Road, Rathmines Road, Clogher Road, all will be added to, virtually, the same level of private car usage already on these roads. This paints a very bleak picture for this area. Despite the protestations to the contrary of NTA, local knowledge predicts that Stannaway Road will take the brunt of the virtual closure of two of the busiest south-side transport routes, Lr. Kimmage Road through to Harold’s Cross Bridge, and Templeogue Rd through to Portobello Bridge.

3.4 NTA projects that, on Wellington Lane there will be a reduction of 291, from 2,141 to 1,851, in the number of vehicles using this road at morning Peak Hour, a reduction from 1,108 to 926 (182) on Cypress Grove Road and a reduction from 1,036 to 689 (348) on Templeville Road.

3.5 The imposition of a bus gate (6am to 8pm seven days a week) at Olney Crescent on the approach to Terenure Place together with the Bus Priority signalling in Templeogue village are designed to make it difficult or impossible for the General Traffic to reach Terenure village by the R137. The Records Residents Association predicts that the swing off the N81 will begin at the Spawell Roundabout, as there would be little

¹ We over-calculated the number of potential seats as 80 per bus. NTA report states a typical double-deck bus carries approximately 60-70 passengers.

point in general traffic continuing into a heavily constricted network of roads ahead of this point. This will be further impacted by the BusGate on Lr. Kimmage Road (6am to 10am and 4pm to 8pm seven days a week) and a road closure from Sundrive Cross Roads to Harold's Cross. Therefore, we expect an increase, not a decrease on Wellington Road, Whitehall Road and Rockfield Avenue which feed directly to Stannaway Road – the alternative route.

3.6 Furthermore, many of the roads affected by displaced traffic will also carry buses heading to the three corridors, A, F and D. We question, what the effect on bus journey time saving would be?

3.7 Mystifying quotes from the NTA Response document:

P. 366: *"In summary, the cumulative impact of the Tallaght/Clondalkin scheme and the Kimmage bus corridor scheme on Stannaway Road has been assessed and concluded that the two schemes have the effect of constraining the opportunity for traffic to displace onto adjoining / adjacent roads when compared to the effect when only one of the Core Bus Corridor schemes is operational. In addition to this, with all the Core Bus Corridor schemes operational, there is predicted to be a higher modal shift from private car trips to sustainable modes of travel compared to the singular scheme scenario."*

"Constraining commuters from making journeys by car and requiring them to use other modes, without these modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system" EIAR Main Report Vol 2.

In the documentation supporting its application to An Bord Pleanála, NTA estimates that in 2043 (based on the *Modelling Report for the Greater Dublin Area Transport Strategy 2022 – 2042*) there will be 4,250 passengers on Terenure Road East in the peak hour (am) – about 55 buses. This number of buses, one per minute and travelling, one behind another and unable to overtake while the leading bus is stopped to pick up its passengers together with general traffic and cyclists, is a recipe for bus congestion and cannot be an attractive or a sustainable option for commuters from the Dublin south-west area. We envisage a Streatham like scenario – see news article below.

3.8 This further begs the question... When all the Core Bus Corridor schemes are operational, how do people from south west Dublin get to them? By car? ... Which will remain the highest mode of commuting transport in S.W. Dublin.

4.0 ALTERNATIVE MODES OF TRANSPORT.

"A Platform for Change" published by the Dublin Transportation Authority on 1st January, 2002, which detailed its research and transport modelling, indicated that a "bus-only" solution would not work in south-west Dublin and that a Metro would be required.

In Chapter Three "Consideration of Reasonable Alternatives" NTA states *"As Dublin is a low-density city with a large geographic footprint, there are few areas with the size and concentration of population necessary to support rail based public transport, and the bus system remains essential to serve the needs of much of the region"*.

4.1 We are seriously concerned at the dismissal by NTA of the contribution which a rail-based public transport system could make to south west Dublin. We allude to the findings of the audit of the perfunctory Knocklyon Feasibility Study, when at the Oral Hearing into Metrolink on Monday 25th March 2024, an eminent transport expert testified that an extension of the metro line to Tallaght via various places (including Terenure) was eminently feasible and would have a very positive benefit to cost ratio of between 1.6 and 2.2. This is not in line with NTA/Jacobs finding of benefit to cost ratio as being 0.8. He confirmed our view that the feasibility study conducted by NTA in 2021 of metro to Ballycullen was flawed. He recommended that a new feasibility study should be conducted and that Metro South West Group should be involved in its oversight. We attach a copy for reference.

5: DISTANCE BETWEEN BUS STOPS.

The standards for distance between bus stops appear to be generally based on UK criteria.

However, mobility scooters etc., are not in use in Dublin to the same extent that they are in the UK, thus longer walks for elderly people will, we maintain, have a serious mental and physical effect on our growing elderly population.

So despite the boxes being ticked for NTA there is a human factor here which is not being considered,

- Reasons for this: The underestimation of the demand figures, the lack of estimation re the numbers of buses required to meet the demand, and the sheer lack of road space to accommodate the volume of buses needed.
- The General transport congestion which will occur within the area of the D F and A corridors as a result from the extensive hours of closures due to bus gates on roads within the 'frame' of these three corridors.
- The public-transport congestion which will result from the closure of many city centre streets in the DCC plans due to be introduced in August 2024.
- Evidenced by - The soaring congestion on Church Street, as a result of the closure of Capel Street, gives a clear picture *now* of what to expect if, and when, the proposed closures on the quays, Dame Street, Parliament Street etc. occur.
- It is our contention that we will end up in a similar scenario to that of Streatham in London. – see attachment.

6. CITY EDGE PROPOSAL:

City Edge has not been factored into the scenario and a considerable number of multi storey buildings has already taken place and will continue to do so before this BusConnects Scheme is up and running. This will bring a massive population increase, with the consequent impact on the Red Luas Line and to local roads, as a direct result of the edict of minimal car parking which will result in more on-line shopping and subsequent delivery vehicles on the roads.

We conclude - it is nonsense to say that everything will, "sort itself out when all core corridors are operational". Our essential journeys by car will still be essential but we will have to take alternative routes to those we do now. These will be longer and more time consuming and therefore more damaging to the environment than heretofore.

It makes nonsense of one of the four objectives which the NTA has specified – "*connected communities and better quality of life*".

In light of the serious issues raised in this and in many other submissions, The Recorders Residents' Association believes that An Bord Pleanála should not grant approval for Planning Permission for the Tallaght/Clondalkin Core Bus Corridor Scheme.

Pauline Foster.

Recorders Residents' Association.

30th March 2024.

Appendix 1.

In 2015 Recorders Residents Association wrote the following in a submission regarding our bus service/Public Transport: In Black: the situation in 2015. In Red: the post BusConnects situation.

There are no direct bus service from Whitehall Road to any of our **local Shopping Centres/Supermarkets**

The Square – a very limited service via 54A. (Long walk to Fortfield Road or Wellington Lane.)

Draft Transport Strategy: Will now necessitate 2 buses F2 with a dangerous crossing at Spawell to connect with A3. This will include a longer walk between transfer points.

Nutgrove Shopping Centre - very limited service via 17. (Very long walk or lift to reach bus stop)

Draft Transport Strategy: 2 bus journey. Increase in journey time to this destination which will now be via 81 plus change on Terenure Rd West to 74 (30 min service) or Terenure Aldi with crossing to A2 outbound.

Ashleaf - walk and carry - No direct bus service.

Draft Transport Strategy: no difference made to this destination.

Rathfarnham/Tesco - No direct bus service.

Draft Transport Strategy: no difference made to this destination.

Sundrive/Superquinn - No direct bus service.

Draft Transport Strategy: Direct bus service now via F2..

Lidl Greenhills Road - No direct bus service.

Draft Transport Strategy: no difference made to this destination.

Superquinn/Aldi/Lidl Walkinstown Avenue - No direct bus service.

Draft Transport Strategy: no difference made to these destinations.

This has latterly changed with the opening of Lidl and Aldi at Terenure.

Draft Transport Strategy: Direct Access maintained via 81 bus.

Hospitals: There is no direct bus service to any of our Hospitals.

Tallaght Hospital.

Draft Transport Strategy: Will now necessitate 2 buses F2 with a dangerous crossing at Spawell to connect with A3. This will include a longer walk between transfer points.

St. James Hospital.

Draft Transport Strategy: No difference. F2 with a dangerous transfer to O corridor at Kelly's Corner. = Lengthy.

National Childrens Hospital Crumlin.

Draft Transport Strategy: No difference -2 or 3 buses.

St. Vincents .

Draft Transport Strategy: No difference = at least 3 buses.

Temple Street

Draft Transport Strategy: No difference known due to uncertainty re city center arrangements.

All 3 Maternity Hosps.

Draft Transport Strategy: Rotunda and Holles Street now on direct bus route. Coombe via F2 + 74 – disadvantage 30min connection likely.

Blackrock Clinic (1½ hrs travel time by two buses - each way!)

Draft Transport Strategy: No Difference. Copious buses.

VHI Swift Clinic Dundrum.

Draft Transport Strategy: No difference.= 2/3 buses/luas = Lengthy.

Local Schools. No direct bus service to the vast majority of Local Schools.

Served: *Presentation Girls / Boys School Terenure/High School/St. Louis/St. Mary's.*

Not served: *St. Damians. St. Pauls/Holy Spirit. St. Pius. Templeogue College. Our Ladys. Terenure College*

Draft Transport Strategy: No difference.

Bishop Shanahan/Galvin. St. Mac Dara.

Draft Transport Strategy: Now served by direct bus route.

Extra-Curricular Activities at Local Schools:

No direct bus service to many of our-Extracurricular activities provided at local schools.

Which include - *Art & Craft. Languages. Ballet. Irish Dancing. Ballroom. Speech & Drama. Music. Sport.*

- No direct bus service to either the **Luas or the Dart.**

Draft Transport Strategy: No difference.

- No direct bus service to **3rd Level Colleges.**

Draft Transport Strategy: With the exception of DCU, No difference.

- Served: Rathmines College of Further Education. –
- **Direct Access Lost and by Draft Transport Strategy restored.**
- Served: Atlas Language School
- **Direct Access Lost and by Draft Transport Strategy restored.**
- *UCD* - long walk/lift or F2 or 81 to connect with S4 .
- *Dunlaoghaire College of Art and Design* - a nightmare journey which takes up to 2hrs travel time each way.
- *Draft Transport Strategy* -Difference is - it will involve 3 buses and take longer.

Many of the above journeys will still necessitate using the car.

Draft Transport Strategy: For the next twenty/twenty-five years the time taken on most car journeys will be lengthened due to road closures and traffic displacement in relation to the Core Bus Corridors.

EXCLUSIVE [READ MORE: Extra 40-minute commutes, the taste of fumes in the air and ambulances stuck in gridlock: What life is like for Londoners living in 'nightmare' LTN](#)

in route from south London into Surrey

A sign warning motorists not to drive down Valley Road, part of a group of streets that make up the Streatham Wells LTN



Delight as London low traffic neighbourhood that caused so much congestion that buses were taking two hours to do three miles is scrapped after even Sadiq Khan U-turned

- Lambeth Council announced U-turn after scheme was in operation for six months

A Low Traffic Neighbourhood (LTN) which causes such bad congestion that buses take two hours to travel less than three miles has been [scrapped leaving locals delighted](#).

Labour-run Lambeth Council has suspended the Streatham Wells LTN in [London](#) which has caused traffic nightmares since being introduced in October last year.

The A23, which runs along the western side of the LTN and is one of the main routes out of London into Surrey, was constantly gridlocked.

Data released by Transport for London last month also revealed one bus took 121 minutes to travel 2.9 miles because of congestion. It would have been twice as quick for passengers to walk the route which is only scheduled to take 29 minutes.

The traffic on the A23 was so bad that it took buses two hours to travel just three miles



- [Map of the Streatham Wells Low Traffic Neighbourhood \(LTN\) which was introduced in October last year](#)

[View gallery](#)

FULL ARTICLE AVAILABLE ON GOOGLE SEARCH.