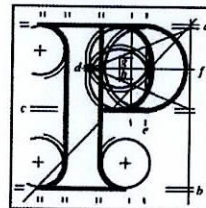


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

I Love Terenure 2030
140 Terenure Road North
Terenure
Dublin 6W
D6W N797

Date: 17 August 2023

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

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

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

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

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Bus Connects Submission to An Bord Pleanala in respect of the:
Templeogue/Rathfarnham to City Centre Core Bus Corridor

Submitted by **I Love Terenure 2030, TRADER / Community Group**

140 Terenure Road North, Terenure, Dublin 6w, D6w N797. [REDACTED]
[REDACTED]

We wish to make a submission in respect of the planning application submitted to An Board Pleanala by the NTA in respect of the proposed Bus Connects Templeogue/Rathfarnham Bus Corridor Scheme.

We attach our €50 submission fee

Our submission is to highlight the impact the project will have not only on our community but also on the severely adverse effects it will have on commerce and trade across the corridors. The knock-on impact on the sustainability of the surrounding existing development, the retail and service centre and the residential / customers of said commerce these businesses serve.

We understand and welcome the improvement in local transport, however, it is a balancing act. The benefit of the proposed Bus Corridors needs to be weighed up against the detrimental impact it will have on the Urban Villages, Dublin City, communities and commerce/ trade.

From attending many public consultation meetings and receiving many mixed messages, our summarised understanding as a group; NTA objective of the proposed project is to make the Bus system in Dublin more effective, expedite bus journey times from suburban Dublin into the City Centre and improve cycling infrastructure through segregated cycle lanes while removing commuters out of cars and on to one form of transport 'Buses' (NTA's own words).

To summarise the BusConnects submission to An Board Pleanala is 5,144 pages long and has omitted some vital information in the conclusion. The Templeogue/Rathfarnham Core Bus Corridor appears to suggest that bus journey times will be reduced by no more than **Six minutes** if all the changes proposed in the plan application were granted at a cost to date of €2.4 billion and rising. This seems to be the one and only tangible benefit out of the entire 5,144 pages in conclusion.

Based on the results presented in Table 6.53, the Proposed Scheme will deliver average inbound journey time savings for A2 service bus passengers of circa 6 minutes in the AM in 2028 and 4 minutes in the AM in 2043.

This is a screenshot from the Traffic and Transport Chapter 6 document, page 136:

This plan needs to assess whether the significant infrastructural development is proportionate and worthwhile to achieve such a modest gain. "Saving 6 minutes with slightly more capacity on some routes but quite a bit less capacity on others". These very modest savings needs to be balanced against the detrimental impact that the proposal will have on our business and community.

It immediately becomes clear that the cost and reduction in trade, quality of life and environmental impact far outweigh any theorised improvements.

This is not a long-term project and is projected to have an approx. construction phase of 2-4 years (NTA still to clarify actual construction timelines) and will be due to review between 2035 and 2040. We would like to emphasise the questionability of such a large investment in what can only be described as a short-term project. Approx. 12-15 years of 6 minute shorter travel time at a cost of €2.4billion +

By 2035-40 we could have a very accessible Metro system in place that could cater to the increased population. We need to future-proof the city now.

The villages of Templeogue, Terenure, Rathgar and Rathmines will be changed forever if the application is granted as sought. It will result in these historic villages becoming destroyed with no hope for rehabilitation forever. We have made these mistakes in the past with a myopic unreasonable mindset, pushing a square peg into a round hole only to tick a box at any cost.

These villages and places of commerce/ trade and people's homes will become predominantly thoroughfares. The impact of these villages and livelihoods is a matter that must be considered by the Board as no consideration has been suggested on their remit by the government, county councils or considered by the NTA as being in any way an issue that should be addressed to proceed with the project.

Flawed Consultation and Initial Premise

- 1) An inappropriate brief was given to Jarret Walker
There was no demand analysis requested or carried out.
He was not allowed to examine options other than buses.
However, the Dublin Transport Office had reported that"
"In summary, the analysis of the "Comprehensive Bus scenario established that buses alone could not address the problem because in many of the main transportation corridors, the bus mode can not provide the necessary capacity to cope with the forecast demand"

A Platform for Change, Dublin Transportation Office, 2021

The report went on to recommend that Metro would be part of the solution in South West Dublin.

- 2) No demand Analysis was carried out

How can we know how many passengers the system will need to carry? Walker then had to rearrange buses on the current demand

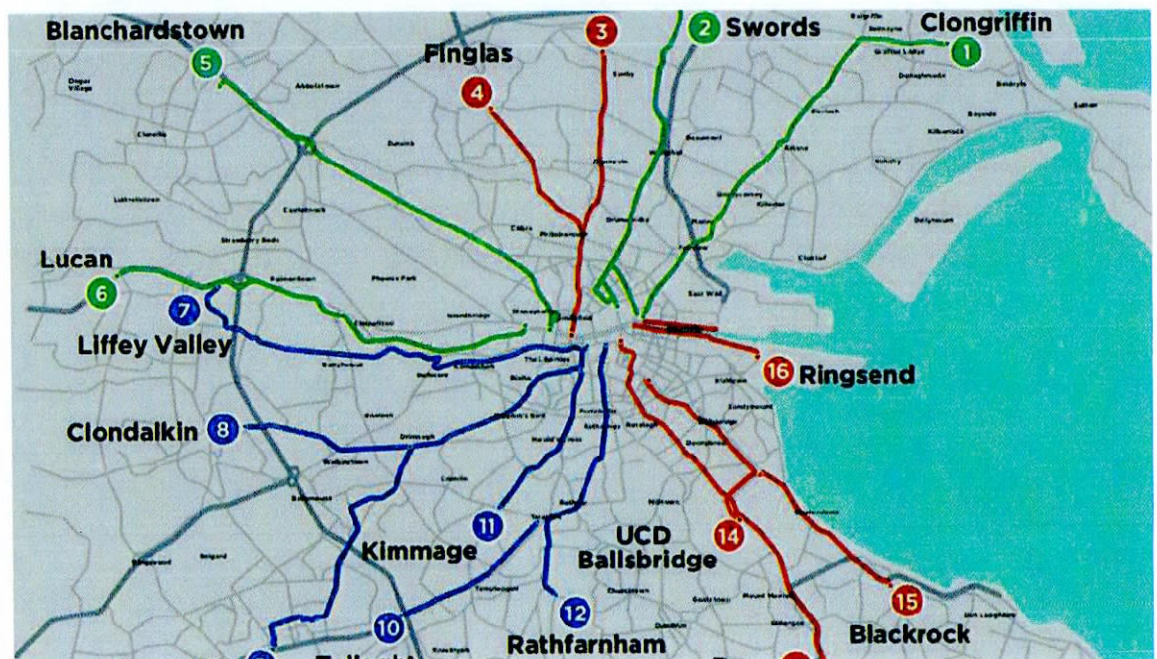
"It is worth noting that the service frequency proposals in both the 2018 and 2019 proposals are reflecting the current passenger demand level" (letter Hugh Cregan, NTA to Minister Eoghan Murphy, 2 December 2019)

- 3) The inability of the proposal to supply the forecast demand for public transport.
How many buses are proposed?

Remarkably, despite the submission to An Bord Pleanála running to over 5,000 pages, there appears to be no information regarding how many buses are being proposed on the various *BusConnects* corridors. This is a very serious gap in the information provided by the applicant

- 4) All maps of the *BusConnects* network have a hole in the middle. For example, the 'A' corridor (Rathfarnham/Tempoogue to City Centre) exists also on the North side of Dublin (Swords to City Centre). Buses on this 'A' corridor go right through the centre of the city and out to an extremity (terminus) on the other side. But how do the buses go through the centre?

Figure 3.2 The hole in the middle of *BusConnects*



The Rathfarnham/Tempoogue application to An Bord Pleanála finishes at the bottom of South Great Georges Street. The Swords submission finishes in Parnell Square. But how do buses go over and back between these two places?

Unfortunately, Jarret Walker went back to the USA without giving us this information for any of the corridors. And the applications to An Bord Pleanála do not tell us either, as the north-side and south-side submissions are separate.

As we know, the city centre is the most congested and contested part of the city. It is not at all clear, that driving unknown numbers of buses on unknown routes is possible or viable in the city centre.

A Platform for Change (which was written 22 years ago!) provides a graphic description of the consequences of excessive reliance on buses and concludes with a damning verdict: 14

“Examination of the passenger flows on the main orbital and radial bus routes shows that many of the radial bus routes would be well over capacity – particularly as they approach the city centre. To cater for the passenger demand on the main radial routes would require the operation of double deck buses each carrying 80 passengers at 30-second headways. In such a scenario, passenger loading at bus stops would be so heavy that buses would be unable to deal with passengers boarding and preserve the headway of the service between them. In addition, the physical infrastructure required for such a frequency of buses would greatly reduce road capacity for cars and goods vehicles and average radial speeds for these vehicles entering the city would be similar to the Do-minimum situation (8kph)”

4A Platform for Change, Dublin Transportation Office, 2001, page 25,

NTA withheld this vital information from their *BusConnects* proposals.

It is vital that the applicant provides information on:

- 1) **The routes that all buses will take through the city centre;**
- 2) **The volume of buses that will be involved;**
- 3) **The measures that will be required to achieve the required throughput of buses;**
- 4) **The implications of these measures.**

The projected cost of the full project is now known to be enormous. The latest forecast is **€4.2bn**: the price of two children’s hospitals.

We have seen that for the Templeogue/Rathfarnham corridor, the projected volume of buses is now twice that envisaged by Jarret Walker when he designed *BusConnects*

The NTA, by their own admission state that the roads surrounding the main corridor will have increased volumes of traffic (albeit it is contended that their own figures are flawed) for example (all cited as pm peak times unless otherwise stated):

Harold’s Cross Road	1,017 increasing to	1,265
Rathdown Park	189 to	305
Rathdown Park	116 to	240
Clareville Road	701 increasing to	854
Larkfield Ave	903 to	1,076
Larkfield Park	700 to	849
Kenilworth Park	760 increase to	885 am
	719 to	893 pm
Kenilworth Sq N	381 to	511 am
	348 to	474 pm
	330 to	498 pm

Kenilworth Sq South	145 to	330
Kenilworth Road	348 to	481
Leicester Ave	171 to	343
Harolds Cross Road	1,017 to	1,265 am
	889 to	1,068 pm
	330 to	458
Beechwood Road	426 to	543
Mountpleasant Place	147 to	354
Oxford Road	155 to	270
Cullenswood Road	756 to	1,114

- Rathgar Road will be a prohibited route outbound, up to 9,925 vehicles that use this route will have to find a different route, as will up to 522 lorries.
- Kenilworth Road will be a prohibited route at the five way junction, the cars that use this route will have to find a different route as will the lorries. No data is available on this.
- nHighfield Road is likely to get increased traffic including the lorries, as it seems to be the likely preferred option for accessing Rathgar from Rathmines.
- Rathmines Road will be a prohibited route, up to 9,731 vehicles that use this route inbound and up to 9,916 vehicles that use this route outbound will have to find a different route as will the up to 73 inbound lorries.

Every one of those extra vehicles passing through a residential area is a possibility for an accident to happen. They will impact on residents trying to access and exit their homes or enter the trade centres. It will lead to increases in stationary traffic due to sheer volumes, all affecting the environment and air pollution.

	Today	Today	BusConnects	BusConnects
	Kms	Mins	Kms	Mins
Orwell Park Way to Bushy Park	2.9	7	5.1	12
Orwell Park Way to Mount Argus church	4.8	12	8.1	23

It is foolish to imagine that all of these trips can be undertaken on foot, by bike or using public transport. i.e. Trade and Commerce collections and deliveries.

BusConnects, as proposed, would add many kilometres and minutes to these typical car trips. Increased emissions for these trips are inevitable. Another unfortunate consequence is that many people may be deterred from moving about.

Constraining people from making journeys by car and requiring them to use other modes, without those modes having the necessary capacity to cater for such transfer, would not deliver an effective overall transport system'. This is at odds with the evidence presented elsewhere in the proposal. In this particular corridor, a key element of the Proposed Scheme appears to constrain existing car users or deliveries from making journeys by car/van/lorry

and require them to use other modes. However, as the EIAR acknowledges the Proposed Scheme, in particular, 24 hour bus gates on Templeogue Road will likely lead to redistribution of trips in certain locations in the corridor, including the area to the north and west of Templeogue Road bounded by Cypress Grove Road - Terenure Road West as well as areas accessed by existing journeys affected by the bus gate proposed for Rathmines Road Lower. This will have a detrimental effect on traders and the traders in this area.

This would have the effect of producing 'rat running' through currently relatively quiet residential areas and generating longer journeys for those continuing to travel by car with the attendant environmental effects, including impacts on overall emissions and other safety indicators. It will also reduce the need or frankly, the time to access the commercial areas along the corridor will drive trade and employment in the opposite direction.

There is likely to be an increase in informal park-and-ride use of inner suburban residential streets of Templeogue and Terenure as car users from further afield are unable to complete their journeys within walking distance of destinations. Or for other commuters who will find using the orbital routes too time-consuming and will resort to driving their cars as far as they can before taking the bus corridor as their last option. To their final destination. The area will become a glorified car park.

Lack of foresight about Trade and Employment

Ironically the M50 was built to support regional connectivity and economic interactions between different areas. It supports growth by improving access to business, industrial areas and commercial centres. It enables efficient movement of all goods, which is essential for supply chains, manufacturing and commerce. This is the remit the government made over 20 years before the construction of the M50.

How is it that they omitted to apply this thinking to their instructions to the NTA on the national public transport infrastructure project? Business does not only take part in the in the city centre or on the west side of the M50. The myopic view of moving passengers from the outer suburbs to the city centre with no regard for the trade and commerce that happen in between these routes is an indictment of this proposal.

Cargo/equipment/deliveries and most of all, our customers all have to access these towns and villages to keep these businesses alive and vibrant. There is no provisions for access to run these businesses efficiently. These businesses are the corner stone of the County councils rates collections, the government corporation taxes, and income tax. The money that ironically is contributing to paying for Bus Connects.

They give us the M50 and take it away with Bus Connects.

The traffic i.e., Lorries, and van deliveries will be coming off the M50, and as soon as they hit the Spawell roundabout they will be at a standstill

There will be a 99% chance of a lack of accessibility to Templeogue, Terenure, Rathfarnham, Kimmage, Rathgar, Rathmines and ironically the City Centre. The staff will arrive 6 minutes

earlier than normal public transport, but they will have no goods to sell because they will be held up in traffic.

Customers who have to transport bulky items, do the weekly shopping, or bring parents or children with mobility issues to medical appointments in these areas will simply be unable to. Parents who have young children of different ages and different schools will simply not be able to use public transport, therefore these parents will be exacerbating the traffic and environmental issues.

Bus Stops

Even if there is an opportunity for customers to use buses to make small errands a considerable number of bus stops are being removed. This alone would bring about shorter journey times as the bus isn't stopping as much as it would otherwise be. It is a deceptive and scurrilous action in journey time reduction and does not in any way consider the walking times of elderly or infirm passengers who will have longer to walk to get to destinations or simply get a bus. For example:

- The outbound bus stop at Westbourne Road removed
- The inbound bus stop at Lakelands Park will be removed
- The two bus stops at Our Lady's will be consolidated into one with no bus shelter. These are busy stops for children alighting to go to school.
- Bus stop at Rathmines Park inbound and outbound removed. It will be necessary to walk to Circle K
- Bus stop at Garville Ave inbound removed to Winton Avenue
- The outbound bus stop at Brighton Road removed
- Inbound bus stop near Brighton Road moved to Rathgar village

The bus stop on Templeogue Road at Bushy Park and Terenure College is being moved to a new location on a part of the road prone to flooding and where the footpath is very narrow. They need to address the flooding issue when making this change if the change is needed at all. This is an example of the local knowledge that is required to ensure that the changes being proposed are correct and warranted.

Flawed traffic modelling and counts

The traffic counts that form the basis of these plans have not been updated since before the covid pandemic. Circa 2019. This week there was an announcement that Ireland has been the country in the EU that embraced **remote working** the most, this means that traffic counts and needs must have changed. This has not been accommodated within the modelling. On the corollary of that, the expected rise in population hasn't been considered fully, we would venture to add that were it to be properly considered a Metro would be a preferable solution for mass public transportation.

The plans from 2019 do account for the increase in traffic volumes however the basis of the projection is flawed. The only periods covered in Bus Connects projections of extra traffic are 7 am to 10 am in the morning and 4 pm to 7 pm in the afternoon. They have wholly omitted

to deal with any other time of day when extra traffic may be more noticeable and will be evident due to the fact that the bus gates are for much longer than would be required and apply seven days a week.

We employ that ABP insist that the NTA carry out an up-to-date Traffic impact study Post covid and permission is not granted until this fundamental box is ticked.

SPECIFICS OF WHERE TRADE WILL BE AFFECTED

1. Villages and Supermarkets: The bus corridor will traverse Templeogue Village, Rathfarnham Village and Terenure Village – but it will also impact traffic going to Kimmage/Sundrive, the village closest to Mount Argus. These all have established businesses and are currently accessible by car, bus and bicycle.
 - a. **Rathfarnham Shopping Centre** – access to this shopping centre will be unchanged under the new proposals, however, traffic volumes because of diverted traffic will be much heavier on all routes to this shopping centre, for example, Springfield Avenue, Butterfield Avenue traffic will be at a standstill as designed by NTA. Deliveries will also have limited access and therefor make operating extremely difficult.
 - b. **Terenure Village** via Templeogue Road – Under the new proposals a resident of Templeville Road would have to go by bus to go via Templeogue Road and this is not feasible for a full week of shopping for a family; so instead a resident would have to drive to Wainsfort Road, Fortfield Road, turn right at Kimmage Cross Roads, Terenure Road West and into Terenure Village – a considerably longer way and this is during the hours of 6am to 8pm Monday to Sunday. This restriction is far too aggressive and not be approved. No suggestions have been adopted or considered when they were suggested to the NTA many times.
 - c. Sundrive Road via Kimmage Road Lower. The businesses and supermarket, including access to Mount Argus and Mount Jerome Cemetery will only be accessed directly between 10am and 4pm or after 8pm daily. As above.
 - d. Nutgrove Shopping Centre – the road to Nutgrove for a resident in Templeville Road or its surrounds runs alongside the Dodder River, it will cross the Templeogue Road corridor and the Rathfarnham corridor but this will have increased traffic volumes due to the impact of diverted traffic, so journey times will be longer also deliveries will have very limited access.

- e. There are petrol stations in Templeogue Village, on Templeville Road, Fortfield Road and Lower Kimmage Road – there is a likelihood of a falloff in footfall in all but the Templeville Road petrol station, either because of increased traffic due to diversions in the case of the one at the Fortfield Road junction, and lack of access due to bus gates at the others. This will have a detrimental outcome on their trade and foresee the loss of jobs and closures.

Delivery vehicles including HGVs will still need access to businesses in the villages and will now be diverted along alternative routes, their means of access to the businesses within the bus gates is unclear. The NTA was in no way concerned with any of these implications in fact they were extremely dismissive and implied it was not in their remit and were not concerned.

Terenure Village, Rathfarnham Village, Fortfield Park shops, Wainsfort Road shops Kimmage/Sundrive traders all have a large number of businesses catering to everything from butchers, greengrocers, florists, party supplies, hairdressers, credit unions, banks, hardware, library, accountants, solicitors, gyms and many others. These are all businesses that are relied on by the local community and are viable because of the access to them by the local community. Compensation for loss of business needs to be considered as a reality for businesses who will be affected by the loss of footfall and with that the consideration of the loss of jobs. There will also be an undetermined construction phase that will impede all trade for over a period of 2-3 years. We have yet to see an **impact study for the loss of business** under the construction phase and also the implementation phase. Is the government willing to see Business fold and loss of income while changing historical villages into ghost towns all for a short term 10 year outcome a €2.4Billion spend and not forgetting the 6 min fast journey time from Knocklyon to City.

There is a huge disparity even between the road treatments of the two different corridors. Kimmage Road Lower is arguably a narrower road and the bus gate there is limited to peak hours, (6am-10am & 4pm – 8am) though inexplicably on a Sunday also, while Templeogue Road is a **6am-8pm seven day a week bus gate** rendering the road unusable during shopping and business times. Bus gates should be consistent in their usage times and limited to peak hours only and at most 6 days per week.

EXAMPLE: The **post office and sports grounds** for residents are located on Greenlea Road, a road which under the scheme a car will no longer be able to turn right into from Fortfield Road – so an elderly person going to 10am Mass in St Pius X church on a Friday and then around to the Post Office to collect their pension, visit the doctor or simply collect a prescription will have to park on Fortfield Road (That's if there is a parking space, we foresee that Fortfield road will be used as a park and ride for commuters outside the area who can only get this far before hitting the major congestion). At the moment there is no parking spaces on Fortfield Road. This will add to the congestion with additional cars parked up.

Likewise, teams visiting Terenure Rugby Club off Greanlea Roads or the VECS sports grounds on Templeogue road (who will have extremely impaired access) will also have the same issue and the **special needs teams** who have mobility issues and cannot walk or cycle will experience similar conditions. Unlike the NTA's narrow-minded view point, not everyone can get out of a car and onto a Bus.

The problem above will also suggest an alternative route, they will drive through Wainsfort Green and out onto Fortfield Road to be able to turn left into Greenlea, this will bring traffic through the College and Wainsfort estates that otherwise wouldn't need to be there. The permanent ban on right-hand turns is completely unnecessary and doesn't take account of the local needs such as the Post Office / Dentist / large medical centre / Chemist / Grocer and sports grounds along this road.

2. The **schools** in the area are all on roads that will now have a significant increase in traffic volumes, child safety does not appear to be a factor anywhere in these plans. Fortfield Park, Fortfield Road, Templeville Road, Terenure Road West, Bushy Park Road, Rathfarnham road, Terenure Road East all have schools and yet these are the very roads that will have increased traffic volumes. Younger children simply can't cycle or take buses alone.
3. The right turn bans are going to lead to a lot of u-turns in the areas where they apply and these will be done on roads that already have increased traffic volumes which is why the turn bans have been put in place. The peripheral roads will become rat runs as a means to do a "lawful" u turn.

Conclusion

- 1) The main car park in the Village will be used as the BusConnects construction depot for an undisclosed timeline. Therefore reducing the capacity to allow trade function and also not allowing access to the HSC Medical Centre and the Evergreen community building where a huge amount of activity amongst the Elderly of Terenure is carried out. These buildings, purely because of what they offer have to be accessed by car. No provision have been made in the NTA proposal.
- 2) A **new traffic impact study** must be carried out post covid, taking into account the EU report stating that Ireland has **remote working** the most of any European country, this means that traffic counts and needs have changed. This has not been accommodated within the modelling. On the corollary of that, the expected rise in population hasn't been considered fully, we would venture to add that were it to be properly considered a Metro would be a preferable solution for mass public transportation.
- 3) A **business impact study** to be carried out on the effects: €2.4 billion, 6 minutes saving on Journey time, with a shelf life of approx. 12 years, a construction phase of 2-5 years will have on the Urban Villages, Commerce & and trade, community life, greater good. The impact the construction phase will have on Trade and Business for

very little tangible return but a massive impact on the community's quality of life and more importantly their livelihood.

4) Also request NTA, to carry out a:

- Transport Modelling report
- Cost estimate as per Cost Management Guidelines
- Economic Appraisal report
- A qualitative Multicriteria Analysis, a common appraisal framework against defined objectives.
- A high level of technical feasibility inc. high level impacts, the difficult issues to be resolved, including engineering, property, construction, traffic, trade and employment and environmental issues.
- A feasibility study is the first step in the process of assessing whether a Metro-type system should be pursued further.

Journey Times from Spawell to O'Connell Street by Car vs Metro, departing at 7.50 am

Transport Mode from Spawell	Time to O'Connell St
Car	Up to 40 mins
Metro	15 mins

5) Lack of foresight on how trade and commerce will be carried out. A myopic mindset of accepting casualties (Hugh Creegans words). Unfortunately there are more than just a few casualties throughout this project. The tax payer being by far the main fall out from this project.

Without the understanding, a square peg does not fit in a round hole. A total lack of willingness to listen or to test alternatives suggested by outside experts and professionals at different stages through consolidation or at public consultation meetings.

6) Carrying out a public consultation on routes ahead of the Corridor consultations. Employing transport expert Jarret Walker with no demand analysis request. He was not allowed to examine any other option only Buses and had not got the full picture. He also is not an expert on European infrastructure, he bases his findings on the North American grid system, which simply will not work in a city such as Dublin. Again the square peg in the round hole scenario. We can see major fault in the current planning application by the NTA, for the A Corridor which finishes in 'mid-air' at the bottom of Georges Street. There is no reference to how the corridor completes the journey to the City Centre or joins with its North Side counterpart, the A Corridor to Swords.

7) The A Corridor – Templeogue / Rathfarnham to City Centre
 The D Corridor – Clondalkin/Tallaght to City Centre
 The F Corridor – Kimmage to City Centre

All of the above corridors should have been considered and reviewed at the same time, each corridor has a knock-on effect on the other. **IMPERATIVE FOR AN BORD PLEANÁLA TO CONSIDER ALL THREE CORRIDORS TOGETHER.**

There is a huge disparity even between the road treatments of the two different corridors. Kimmage Road Lower is arguably a narrower road and the bus gate there is limited to peak hours, (6am-10am & 4pm – 8am) though inexplicably on a Sunday also, while Templeogue Road is a **6am-8pm seven day a week** bus gate rendering the road unusable during shopping and business times. Bus gates should be consistent in their usage times and limited to peak hours only and at most 6 days per week.

'A' Corridor main impacts:

- The closure of Templeogue Road 14 hours per day x 365 and the displacement of some 7,000 vehicles a day.
- The Closure of Rathmines Road 14 hours per day x 365 at St. Mary's College and the displacement of some 9,000 vehicles a day:
- The resultant need to divert to the heavily congested Castlewood Avenue, which is also an Orbital Route.
- The one-way inbound system on Rathgar Road necessitates the use of the heavily congested Upper Rathmines and Highfield Roads for all outbound journeys.
- The change to a signalised junction at the Spawell Roundabout.
- The numerous Right Turn Bans.
- The removal of 1 of the outbound bus stops on Georges Street.

'D' Corridor main impacts:

- Walkinstown Roundabout reduction from 3 lanes to 2.
- Upper Clogher Road closed to General Traffic.
- The creation of Cul-de-Sacs to prevent entry to the Crumlin Road.
- Right Turn Bans.
- Slip road closures.

'F' Corridor main impacts::

- The closure of Lr. Kimmage Road from 6 am to 8 pm x 365 to General traffic from Ravensdale to Harold's Cross.
- Evening traffic will be impacted between 4 pm to 8 pm.

- The removal of 3 slip roads at the KCR traffic lights.
- Closure of a section of Kenilworth Road to General Traffic.

Thus the prospect, particularly for this area, is dismal. Residents' and traders' daily lives and business are likely to be thrown into turmoil.

8) Flawed Public Consolation

With the exception of one week, Round 2 of the consultation process was carried out within a Level 5 Covid Lock-down period.

It was carried out for the most part On-Line.

Many people were excluded due to their lack of IT Skills, or simply did not know it was on.

No information books were printed or distributed for this final phase - NTA's Planning Applications to An Bord Pleanála.

No Public Information Meetings were held by NTA to outline changes made to the original plans.

The report is 5000 pages long and the information is hidden in the small print. The community were split and divided through public consolation.

The frequent re-naming of the Corridors adds to the (deliberate?) confusion of the general public – E.g.,

- *Core Corridor 10* and *Core Corridor 12* changing to...
-
- *Tallaght to Terenure Core Bus Corridor* and *Rathfarnham to City Centre Core Bus - Corridor* then becoming...
-
- *The A Corridor...and the most recent re-naming... Templeogue Rathfarnham Core Bus Corridor.*

- 9) Lack of consideration for improved capacity. Only consideration is to speed up journey times. see chart on next page

Bus corridor	Current	Current	BusConnects	BusConnects
	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
Tallaght-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

Under *BusConnects*, the projected increase in the number of buses going into the city in the peak morning hour is very small for such a massive impact on our committees/business and the not forgetting the national budget.

TERENURE ROAD EAST – DESTRUCTION OF THE AESTHETIC QUALITY OF TERENURE VILLAGE. LAND TAKE – REMOVAL OF 300 YEAR OLD TREES.

- We feel very strongly that the widening of approximately 100 m of this road purely *to extend* the existing bus priority is fundamentally wrong.
- The Village cannot be widened because of the buildings that exist on it. Therefore the gain by doing this extension is minimal. The cost is enormous in both monetary and aesthetic squandering.
- It is, therefore, a somewhat pointless exercise to destroy this most pleasing Victorian approach to the quaint village for such little gain.
- There is an alternative. Underground must be developed in Dublin in line with every other European City.
- We know the proposed increase in number of buses is 7.
However, the NTA has asserted, without evidence, that the proposed bus corridors can carry “multiples” of the number of buses set out in the *BusConnects* plan. This is entirely fanciful as the corridor would struggle even to accommodate the planned number of buses under *BusConnects*.

From the latest figures produced by the NTA it would appear that in the region of 54 buses would be needed in the peak morning hour to meet the transport demand. If 54 buses go in then 54 must go out. Total through the

narrow village 108 buses per hour, coupled with traffic to Aldi, the Church, the Boys school and General Traffic.

We reiterate. There is an alternative. Underground must be developed in Dublin in line with every other European City.

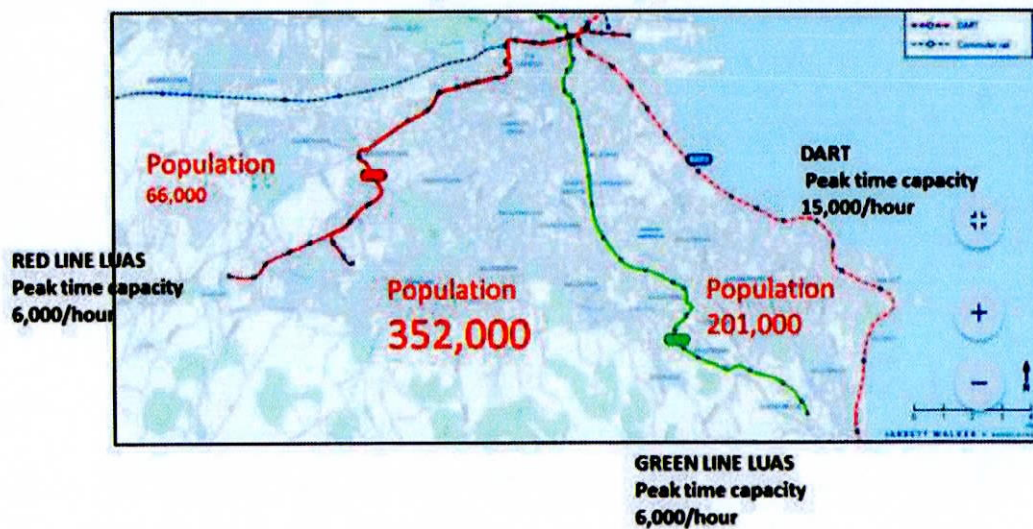
We totally acknowledge and fully support the need for Climate Action and the need to get more people to use public transport.

- The *only means of Public Transport* available to South West Dublin is buses. This cannot be the only form of transport.

We question the ability of Buses to be able to meet existing demand *and* the growth requirement. We are also aware that, according to the Transport Strategy for the Greater Dublin Area 2022-2042, car usage is only set to diminish by 1.5 % in the Greater Dublin Area by 2042.

Metro South West

The need for public transport in SW Dublin



It should be borne in mind that we do what City suburban people do, i.e., we move in many directions within our area. We do not just go 'IN' and 'OUT' of the City. Our daily journeys take us in myriad different directions. BusConnects only emphasis is IN and out of the City.

Given the scant increase in buses across the three corridors one can easily see that the increase in bus usage will simply not be enough to remove a sufficient number of car journeys. We need a collective inclusive approach.

We urge the deciding members to make the many microscopic and the larger changes to this route that will take into account the needs of the local residents and businesses alike. The world is a very different place post Covid, this simply cannot be ignored. The project needs to

be looked at collectively. NTA needs to go back to the drawing board for alternatives with proper environmental impacts, and quality of life for towns and communities along the route. How life itself will be carried out during the construction and implementation phase.

Remembering we have made mistakes in the past, this project will remove land permanently and change our historical village forever.

The sheer spend alone cannot be justified for such a small outcome, we need to future-proof the city for hundreds of years, not 12 years.

London built their 1st Metro line in 1863, 160 years ago. Futureproofing the city for hundreds of years. Our metro project was approved 20 years ago, but a change in government decided to opt for the cheaper Luas lines, to reduce spending. Now the Luas is over capacity and the lines cannot take larger carriages, again because of cost-saving implementation to the tracks at the time. Therefore making that choice a myopic unthought-out decision. We can't keep making these mistakes.

The simplest conclusion for a trade/commerce/communities point of few:

With the proposed bus gates 24/7, 6am – 8pm Local Businesses will become unviable. Our customers will have to travel further afield to access comfortable purchasing/services. Therefore, creating longer journey times, extreme traffic and environmental issues. The emphasis should be on maintaining communities such as Terenure along with their nearby services in the interest of proper planning and sustainable development of a community. Futureproofing.

The proposal is already out of date and redundant in the current environment.

We believe there should be an oral hearing on this route and we are asking for one to take place.