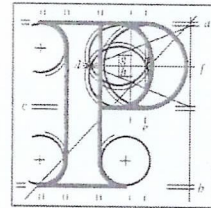


Our Case Number: ABP-317660-23



**An
Bord
Pleanála**

Brendan Heneghan
88 Parkmore Drive
Dublin 6W
D6W X657

Date: 07 December 2023

Re: Busconnects Kimmage to city centre core bus corridor scheme
Kimmage, Dublin

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

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AN BORD PLEANÁLA	
LDG- <u>068429-23</u>	
ABP- _____	
05 DEC 2023	
Fee: € <u>50</u>	Type: <u>C959</u>
Time: <u>12:47</u>	By: <u>hand</u>

4 December 2023

An Bórd Pleanála

Marlborough Street

Dublin 1

Planning application Core bus Corridor Kimmage to City Centre 317660

Dear Bord

I wish to object to the granting of permission for the above bus corridor.

I should say at the outset that the core of my objection is the four bus gates proposed (including one at Kenilworth). This is by far the biggest number of gates on any of the twelve schemes. If they were to be reduced to a single gate on Kimmage Road Lower/Harold's Cross Road inbound (and perhaps outbound at an appropriate point) and a condition imposed that they were subject to strict and short time limits and definitely not Saturday and Sunday, which could not be altered without further formal consultation and permission, I could live with the proposal. In Appendix 12, I set out observations about bus gates generally and their vast overuse in the south city.

I am particularly unhappy that the southernmost bus gate, which is very problematic for Terenure, was introduced at a late point in the process, after which meaningful consultation was closed down by the NTA and there was no consultation with the non computer literate.

I should stress that I have no issue with bus lanes and whether they operate 28 hours a day, 8 days a week or 400 days a year or on Thanksgiving. I do however think the facility where one can drive in bus lanes 10am -12.30pm every day in some cases is a useful measure to incentivize traffic to travel at a quieter time and should not be wholly dismissed by An Bord in the context of bus lanes.

I believe given the gross deficiencies in the scheme, an oral hearing is required to tease out issues and I request that one be held. Having attended part of an oral hearing into DART Plus West, I believe there are far more problematic issues with this scheme and that it is even more meritorious for an oral hearing.

My own position

I am a very heavy use of buses. I think it would be far more useful if NTA were to ease off on annoying the south west city with grandiose road engineering schemes and instead concentrate on providing more buses, making sure there are no "missed" or "ghost" buses, that buses are not full on arrival and that in particular if a bus appears on real time information, it does actually turn up, more or less when real time information says it will. I entirely accept that if real time information says it will appear in 10 minutes it could be 13 minutes and that there can be mishaps such as an accident within the 10 minute time frame.

I am very familiar with the current 15, 15A, 16, 17, 49, 54A, 65 and 65B services local to Terenure and I suspect I know far more about them than the people who wrote this indigestible planning application. I am also very familiar with all the local roads, which are likely to be heavily used if main roads are impeded. I was struck in the very limited engagement with NTA some years back about how little knowledge they had of even where significant local roads are and yet they propose to hand down schemes which badly affect those roads. I would have at least expected that those dealing with the Kimmage scheme would know all the local roads well.

Some key dubious claims in the application

As I read it from Chapter 6 "Traffic and Transport" and more generally, the key objectives here are to get people to switch from car to bus and to achieve a shorter journey time to the city. I don't think this scheme on any analysis achieves either. I would have thought that vastly more buses for the only part of the city without rail would be a place to start.

It is notable from pages 79 and 83 that by 2043 the average saving will be 5.4 minutes inbound and 1.8 minutes outbound. I, based on real experience, dispute these claims, which I think are overstated in an inbound direction. Even if they are right the outbound figure does not justify any bus gate anywhere. In any event these time savings are disproportionate to the inconvenience.

It is notable also from the map on page 73 "Traffic and Transport" that by 2043 the shift to buses appears to be an increase in people movement from 858 to 930 outbound a mere 8% and a slightly larger 10% inbound. There is a massive decline between 2028 (where the comparative number seems to be 1,500) and 2043. This seems to be a clear admission by NTA that the project will quickly be a failure on that score.

The 2028 projection (page 67) is for 1,710 passenger movements inbound. There are 18 F buses an hour using the route in the published schedule (see BusConnects website) so almost 100 passengers per bus. Are we going to have Indian style buses with passengers on the roof?

I think the projection of 240 passenger movements (also page 67) in cars is fanciful, given the lack of bus capacity to carry 1,710. Further there will be no through cars on a big section of the route which has to render the weighted figure suspect.

The NTA are not very transparent about their consultancy payments, but with some of the statistics that allegedly support the mode switching potential of this route, I presume the Brothers Grimm are on the payroll for the "Traffic and Transport" section.

I can't find anywhere in the documents any analysis of what the current cycling baseline is, which should have been measured. I think all the cycling stats are "finger in the air".

I think it would be instructive to have the NTA produce for the Bórd comparative figures for extra bus passengers in 2028 and 2043 for the other 11 plans; it is not proper that the public would have to do this. Certainly on Templeogue Rathfarnham, there is still a claimed over 60% gain both directions for buses by 2043. On Tallaght Clondalkin the claim is circa 60% and 50% for 2043. On the first scheme Clongriffin the 2043 figures are 35% and 46% respectively. So the Kimmage figures are unimpressive.

On page 91 it is asserted that persons in cars on Lower Kimmage Road will reduce from 1,639 to 704. Given that it is guarded at both ends by bus gates, the 704 figure seems extraordinarily high.

So in my view there are so many credibility issues about a key part of the Kimmage application, that it is difficult to know what can be regarded as accurate.

In this letter, I propose to set out the substance of my objection in a numbered paragraph. This will be accompanied in some cases by a numbered appendix, setting out further detail. The appendix will in some cases be partly in an e mail format.

Planning technical issues

1 The corridor was not covered by the Transport Strategy for the Greater Dublin Area 2016-2035 and consequently in the Dublin City Council Development Plan 2016-22 and is in contravention of same and should not have been pursued until it was incorporated. See Appendix 1

2 The consultation process to date did not observe the requirements of the Aarhus Convention and in particular the Kazakhstan Advice related to pandemic conditions. I have no doubt that many of your observers will be very critical of the highly deficient consultation process; this was certainly the case with many observations on other corridors. See Appendix 2

3 There has been severe discrimination over the 12 schemes against the southside of Dublin, in particular the compromising of many canal bridges by bus gates, the provision of unintelligible traffic counts criticised by the Commissioner for Environmental Information and the creation of a large area from Crumlin Road to Morehampton Road with major impediments to car traffic. It is also unfair process to levy triple €50 fees for three corridors affecting the same area in south west Dublin ; this is not happening for many other citizens.

4 There are numerous procedural issues including the failure to place notices as agreed and the failure to include all the documents on the public file which have led to three separate deadlines for the Kimmage scheme. NTA have advised that this has cost the taxpayer €90k per Dáil question 246. I also note a number of deficiencies which were never brought to the attention of the public., It is my position that there should be strict compliance with these requirements and that failure to do renders the application void. There is a failure to set out exactly what works are sought to be permitted. See Appendix 3

Substantive planning issues

1 The proposal will divert a lot of traffic into local residential roads, which are not equipped to deal with it. See Appendix 4

2 The proposal will create a "cordon" effect in Crumlin/Kimmage/Terenure from which north and south "escape" will be barred and east west escape will be severely compromised. See Appendix 5.

3. The proposal will likely result in the destruction of the commercial activity in Kimmage village. See Appendix 6.

4. The restriction of all general traffic to one lane at Emmet Bridge (Grand Canal) and at South Circular Road inbound will cause traffic chaos in the entire south west city.

Map 8 forming part of the plans indicates that there will be a single lane for inbound traffic at both Harold's Cross Bridge and South Circular Road junction. A considerable number of vehicles turn right at these locations. A dedicated lane needs to be maintained for right turns at both junctions and the right turn at Emmet Bridge should be retained. The current arrangements are appropriate and no changes to this should be allowed. The inbound bicycle lane at SCR could be on the pavement which is wide enough (and is currently used to park motorbikes or throw rubbish sacks).

5 Many local car journeys made daily by residents in the cordon will be much longer

Any person within the "cordon" referred to in Appendix 5 who has a car journey twice a day is likely to have a significantly longer trip. It is currently about 300 metres from Corrib Road south to KCR. The shortest alternative via Stannaway is about 2.5k. Other examples are in Appendix 7.

The creation of this cordon is injurious to residential amenity and is unacceptable. The level of pollution created by those extra kilometres is high.

6 There is no provision in the application to deal with the lorries which travel on the Kimmage Road corridor. It would seem these will have to use residential streets. The poor quality traffic data makes it very difficult to assess the numbers of HGVs that might have to use residential roads.

The traffic counts for the junction immediately before the Ravensdale bus gate indicate about 150 lorries a day in each direction. Within this figure, over 60 are three axle lorries. There is no plan to deal with those lorries, which are clearly wholly inappropriate for a residential street such as Ravensdale and Cashel Road. Similarly there is no plan for the 150 lorries that can't use the Templeogue Road inbound and may end up diverting towards Kimmage Cross Roads.

7 The Terenure Road North/Harold's Cross Road, which is to have a cycle lane, will be seriously overloaded.

The five junction counts on this axis in the Templeogue/Rathfarnham plan imply a current inbound vehicle flow of about 7,000 vehicles per day, which is likely to increase to either capacity or 14,000. The 14,000 represents the inbound traffic recorded at the Hospice in Harold's Cross where Lower Kimmage Road and Harold's Cross Road meet. I strongly suspect capacity will be less.

Because of the likely congestion on Harold's Cross Road, there is likely to be increased use of the minor roads leading off Harold's Cross Road, which offer a through route westwards particularly Mount Tallant.

8. Other than short identifiable times on weekdays, there is little delay in buses on the corridor. This whole project is a solution to a non existing problem. I am very familiar with the 54A which is the

reference bus and I challenge the accuracy of assertions about journey time. I believe these may be based on very dated information likely pre 2020. See Appendix 8.

9. The action proposed here is vastly disproportionate to the benefit. There is little time saving but enormous inconvenience to adjacent residential communities as well as significantly elevated pollution levels from extra car traffic and road safety issues.

10. Any time saving is negated by delays in city bound buses entering the corridor and the much longer route proposed in the city centre for the F services. See Appendix 9

11. The corridor is the least significant of the 16 corridors and largely functions to service areas the city side of Tymon Park within the M50. Most other corridors extend outside the M50. See Appendix 10

12. Lack of space on road for what is proposed

I am sceptical that there is enough space now on the roads to include traffic lanes and cycle lanes as appear on the drawings. The entire of Clanbrassil St from the pinch point coloured green on map 9 to map 8 is narrow and from a visual inspection cannot accommodate what is proposed. In the so called consultation process we pointed out that for example at Terenure Road East, the road was too narrow for three proposed lanes; this was shelved but "without admission of error", I am not confident that all roads have been measured and there are no dimensions in the maps.

13 Covid

Everyone accepts that Covid and its aftermath will alter traffic patterns. The only evidence that appears to be offered by BusConnects is a verbal statement that Covid doesn't really change the need for any of this. This is hardly a satisfactory basis for expenditure of the amount envisaged. There is a clear need for formal research into what will happen, before any permission is given.

Other detail issues

14 Trees at Corrib Road

There is a proposal to add a median island on the corridor close to Corrib Road as per maps 01/02 General Arrangement. This will entail presumably six months of construction (page 3 Construction) and will compromise parking at Tesco Express. This island is in my view unnecessary and should be omitted.

15 CPO opposite Hospice

It's not clear why it's necessary to do a CPO as indicated at map 7. It takes away a lot of very small front gardens. Further the cpo on the Hospice side will take away a very narrow strip in front of the houses there.

16 Mount Jerome

If as I suspect Harold's Cross Road is ultra congested, Mount Jerome cemetery will become unmanageable for funerals.

17 left turn slip at KCR

The project seems to have a mania about removing these types of slip roads. This slip carries 883 vehicles a day as per the traffic count 10-19 direction A to B (26 November 2019) and should be retained. If it is not traffic will likely use the residential Hazelbrook Road. I am sceptical that the new number 74 bus will be able to make this acute turn, without a slip. I note that in observations on the Bray corridor (317742) a number of observers venture detailed arguments about the retention of slip lanes and I ask that you look at the general arguments made there in relevant observations. While on the subject of KCR, the two busy inbound bus stops are to be consolidated; as the extra distance to walk is about 100 metres with no road to cross, I don't have a particular issue, other than the principle that NTA should have flagged this to the public at the two existing sites and have not done so.

18. Dangerous right turns at Fortfield Road

I am very familiar with the possibility for right turns being made from Wainsfort Road to Fortfield Road and at the KCR from Fortfield Road to Terenure Road West. These are both very dangerous manoeuvres. The placing of a bus gate at Ravensdale Park will vastly increase the volume of this manoeuvre. See Appendix 11.

19. Motorcycles

The only useful aspect of the user unfriendly south side traffic surveys is the disclosure of speeding, particularly by motorcycles. It is not desirable given their speed that they be diverted into residential roads by blocking Lower Kimmage Road. Of course there should be enforcement.

20 Historic walls at Emmet Bridge

I believe it is proposed to remove parapet walls on the city side of Emmet Bridge at the Grand Canal. This is flagged at page 46 of Appendix A 16.1 as NIAH 50080982 and stated as "Protected under Policy CHC4 of the Dublin City Development Plan". The reference to CHC4 is out of date and wrong and if the planning application was correct it would refer to BHA9 on page 358 of the current plan. It is described as "Cut limestone wall topped with dressed granite erected c1790 extended to north c1860. Granite steps to west. The engineers of the Grand Canal may have been responsible for the construction of this well built limestone and granite wall which marks the approach to Robert Emmet Bridge." I believe it is contrary to the development plan (and in particular bullet 6 in Policy BHA 9) to permit any interference with this wall and I am quite sure sensitive road engineers could work around it.

21 The Poddle

The route of this bus corridor and the associated cycle lane is very close to the River Poddle for the entire length of Lower Kimmage Road. While I don't think there is any feature particularly endangering it, I do find it quite surprising that apparently on this scheme, the production of an environmental report is apparently entirely voluntary on the part of NTA. The Poddle is a slightly discontinuous green route from the canal south to its source in Tallaght and I assume important to

nature. The Stone Boat close to Sundrive Road does seem to be implicated in the scheme and is an important historic structure. I assume the Bórd will satisfy itself that none of the above are affected by the scheme.

Time limiting gates

There is a case for allowing the principle of the corridor but only having one gate in each direction, peak time only. A morning peak gate at Ravensdale might be warranted and an evening gate at the city end might be warranted, Monday to Friday only.

If time limits were in operation, there would be a lot of problems at the times they operated and this would be very painful for residents. This is particularly so, given that most buses run within an acceptable time through the corridor. However in principle there would be no problems outside the operating time. See Appendix 12

Other issues

Expert opinion

I was very concerned to find out recently that a body which I believe is associated with NTA and is involved in the Metrolink application (your ref 314724) has (quite properly) funded third parties in the vicinity of the proposed Charlemont station to get professional advice on that application. It is only right that state bodies should provide such funding, if they insist on lodging exceptionally complex proposals.

The community in the Terenure area has long ago come to view that it needed professional assistance in assessing very complex planning applications for bus corridors and got limited such assistance in the context of the Templeogue Rathfarnham corridor. It is appalling that NTA has not made everyone aware that it has funded such assistance for other groups and offered to do the same for groups affected in much the same material way by bus corridors. Communities have been forced into spending a lot of time fundraising to cover professional advice, which distracts from time to be able to focus on the issues. This is yet another example of unfair discrimination by NTA as between residents groups in the south city.

I am asking that to remedy this an oral hearing should be held and that you direct NTA to fund professional advice for the community from a transport expert, who can articulate on the community's behalf all of the problems created by this scheme, as evidenced in observations. I believe pretty well the same issue is applicable to the Templeogue Rathfarnham corridor; due to concealment by NTA I was not other than peripherally aware when this was live that assistance was given to other groups.

Difficulties for motorists in the south city

This is a point already flagged, but north and west city motorists are not being excluded from Howth Road, Malahide Road, Swords Road, Ballymun/Phibsboro Road (with a minor exception, an evening outbound bus gate at Mobhi Road), Navan Road or the Chapelizod bypass. South east city motorists can continue to use Merrion Road and Bray Road. A lane will be available on all of those roads for

cars and while the presence of a dedicated bus lane may make the traffic lane slower, it does not exclude traffic.

By contrast pretty well all of the main roads between Chapelizod bypass and Bray Road will not be available for use by car owners. The Ballyfermot Road/ Kilmainham, Clogher Road, Lower Kimmage Road and Lower Rathmines Road access routes are being denied to motorists by bus gates. For the remaining access routes Crumlin Road, Harolds Cross Road and Ranelagh there are severe restrictions in accessing those roads.

It is inevitable that the effect of all these obstacles (a feature unique to the south west city) is to force traffic into essentially residential side roads. It is self evident from many observations on the Tallaght Clondalkin and Templeogue Rathfarnham corridors, that there is huge concern about this.

It was made very clear to NTA in the limited engagement with them that very detailed traffic projections were needed to indicate how traffic would flow. Further there was no point in having projections that reflected a single corridor as if no others existed and that what was required was comprehensive traffic flows with all corridors factored in. The NTA cannot credibly suggest that they were not well aware of the fears of the local community that traffic would be diverted into their roads and that proper up to date surveys (not 2019) were needed to address this.

This has manifestly not been provided in any meaningful way. It is pretty evident from the paltry information provided that there will be huge displacement of traffic in the south west city. I also note the appearance in recent days of survey cables across local roads leading to the Kimmage corridor and I cannot but suspect that they are related to this project. These are in my view potentially new material information in a planning sense. I believe that all applications in this area including this Kimmage one should be paused by the Bórd until proper projections are provided and the NTA has satisfied communities that they will not suffer extra traffic displaced from main roads.

The area with blocked roads above almost exactly matches the only area in the city (south city between Red and Green Luas) without a fixed rail link. NTA should be planning for such a link and the most obvious way of so doing is the extend Metrolink to Tallaght through the area. The exploration of alternatives is required by Aarhus; I believe metro should have been fully assessed as an alternative to this corridor and not doing so breaches Aarhus., In the interim, if there was a serious intent to divert people to buses, very many more buses would be provided.

While on the face of it, there are more buses on the Kimmage corridor, in substance the F1 is the existing 49 and 54A combined, the F3 is the existing 9 and the F2 is a rerouted 150. There is minimal frequency increase and all that is happening is that Kildare Road/Clogher Road is being robbed of the 150 and Harolds Cross Road is being robbed of the 49, in order to artificially create traffic for Lower Kimmage Road.

Issues of general application covered by me in other submissions

A number of issues equally relevant to this corridor were discussed at length by me in submissions (your reference included below) on other corridors. These include

Changes between stages of consultation Appendix 2 of my Templeogue Rathfarnham submission ref 316272

Traffic modelling issues Appendix 3 of my Templeogue Rathfarnham submission

Failure to set out the works to be permitted Appendix 4 of my Templeogue Rathfarnham submission

Deficiencies around notices Appendix 5 of my Templeogue Rathfarnham submission

Time given to make observations Appendix 6 of my Templeogue Rathfarnham submission

Irregularities around fees Appendix 7 of my Templeogue Rathfarnham submission

Observations by NTA Appendix 8 of my Templeogue Rathfarnham submission

Traffic flows Appendix 24 of my Templeogue Rathfarnham submission

Luas (also penned in for this corridor) Appendix 27 of my Templeogue Rathfarnham submission

Moving bus stops Last paragraph of my Belfield Blackrock submission ref 313509

Administrative errors in my observations on the Blanchardstown scheme ref 313892 and in reply to response document

All one scheme Bray scheme letter ref 317742

Assessment of alternatives Bray scheme letter

The factors in the opening page of my Tallaght Clondalkin submission ref 316828

Failure to assess metro Tallaght Clondalkin submission

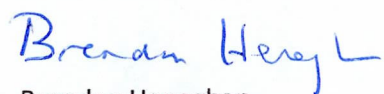
The city centre void Tallaght Clondalkin submission

All points of general application made in those submissions to you are equally relevant to this application and I am asking that they should be treated by you as if set out in this observation.

I enclose the fee of €50 and note my previous observations about this fee being improper given assurances from NTA and the intertwined nature of all schemes.

For the above reasons, I would suggest that you reject the proposal in its entirety.

Yours Sincerely



Brendan Heneghan



Brendan Heneghan <brendanpheneghan@gmail.com>

Kimmage

1 message

Brendan Heneghan <brendanpheneghan@gmail.com>

Mon, Dec 4, 2023 at 2:54 PM

To: Brendan Heneghan <brendanpheneghan@gmail.com>

This is the last of the bus corridor applications. I would like the following noted by the Bórd, not strictly a submission. / *recollect typing something but I can't find it anywhere.*

I have visited your office numerous times in the course of this process. I have found Aisling at the front desk exceptional in her courtesy and have noted while in reception how expertly she handles somewhat agitated members of the public. I am familiar with the importance of a good front of house person. She is a huge asset to your organization.

I have also found Shaun McGee exceptionally helpful in retrieving display files.

This process, given the sheer number of observations, is likely placing exceptional pressure on your staff and I would ask the Bórd to note the dedication of the above people and no doubt many more, whom I have not encountered.

Appendix 1 Contravention of statutory plans

Pages 70 and 71 of the NTA Transport Strategy for the Greater Dublin Area 2016 to 2035 ("GDA 2016 to 2035") sets out 16 corridors described there as "Core Radial Bus Network". The Kimmage Corridor is the only one of the 16 corridors part of BusConnects which was not included in this plan. Please note that the only ^{LOCAL} corridors described there are "Tallaght – Rathfarnham – Terenure" and "Marlay Park to Rathmines". These two link up in a very small map at what is clearly Terenure village. The only provision for changing the corridors is a place holder saying the Ballymun Phibsboro corridor may be amended. Thus until this plan was updated in early 2023, there was in my submission no basis for pursuing the Kimmage corridor.

In its subsequent development plan 2016 to 2022 ("DCC 16 to 22"), the City Council at page 123 effectively recognized the NTA plan "Core Bus Network" (with no Kimmage corridor!) as determining DCC policy. Chapter 08 Movement and Transport deals with this. It states at page 118 that "future public transport projects will now be guided by the National Transport Authority's Strategy for the Greater Dublin Area 2016-2035" Anyone therefore familiar with DCC 16 to 22 and proposing any action near any other corridor could clearly see that a bus corridor was planned. By contrast those on the Kimmage corridor would have no visibility on this until it "dropped out of the sky" in late 2018. It is not in my view open to NTA to act in this way. The city development plan recognizes the commercial area at Kimmage as tier 3; it seems fundamentally inconsistent with this that access to there is shut off by a corridor not part of DCC 16 to 22. Therefore I believe the proposal contravenes that development plan. That would have been the effective development plan until 14 December 2022.

The new development plan for Dublin, Dublin City Development Plan 2022-2028 ("DCC 22 to 28") came into force on 14 December 2022. At that point the effective NTA plan was still GDA 2016 to 2035 plan with no Kimmage corridor. While the Dublin plan DCC 22 to 28 refers to the NTAs Transport Strategy for the Greater Dublin Area 2022-2042 (for example at page 236), it wholly fails to pick up in the map on page 252 the very material change introduced since the previous plan, namely the dropping in of a Kimmage corridor. Further it fails to note that the GDA Transport Strategy 2022-42 ("GDA 2022-2042") was only adopted in or around 24 January 2023, which is the date of announcement of same by NTA. Under the current Dublin Development Plan DCC 22 to 28, Kimmage is noted at page 208 as an "urban village".

It would also be my position that the first time NTA had any authority to advance a Kimmage corridor was after the GDA 2022-2042 was adopted, as under section 12 Dublin Transport Act 2008, Ministerial approval is needed for the new plan to become effective.

I note that in justifying another more minor change from GDA 2016-2035 on the Belfield Blackrock corridor, the NTA Belfield Blackrock response refers to the Transport Strategy for the Greater Dublin Area 2016 to 2035. I would point out that in the map on page 71 of that document there was no provision for linking the Bray N11-UCD-Donnybrook and the Dun Laoghaire-Blackrock-Ballsbridge corridors together. As NTA have cited this in page 19 of their Belfield Blackrock response as the basis for so doing, it is appropriate to point out that in a session of the Dail Transport and Communications Committee on 4 May 2022 (see page 7 of transcript), the Deputy Chief Executive of

NTA in a contribution on a DART extension in Wicklow indicated that if something was not in the plan it lacked statutory authority to be submitted to the Bórd and could not be done. This was in the context of explaining the difficulty the NTA had with progressing a project of extending DART to Wicklow, a project requested by a Wicklow TD. This begs the question as to other consequences of something not being in the plan until at earliest January 2023. It seems wrong in principle that DART to Wicklow can be turned down and not pursued for not being in the GDA 16-35, but Kimmage can be pursued while not in the same plan.

I believe that the fact that the Kimmage corridor was not in either the GDA 2016-2035 or in DCC 16-22 has material consequences for the validity of the whole process at least up to 14 December 2022 when DCC 22 to 28 was adopted and likely to sometime in January 2023 when GDA 2022-2042 became effective. I think there is a strong case based on what was accepted in the Dáil by NTA (in the context of DART Wicklow) that all steps taken to then lack any statutory authority and are likely ultra vires.

Further the net effect of the current Kimmage plan is to severely restrict access by car to a village acknowledged in DCC 22-28 as an urban village. I submit it is wholly inconsistent with the provisions around urban villages to permit access to be cut in the way proposed.

5.5 Bus Infrastructure

As part of the Strategy process, a number of studies have been undertaken which have identified those routes where the demand for travel necessitates significant levels of infrastructural investment in order to minimise delays to bus services.

Arising from this analysis, a "Core Bus Network" was identified for the overall region. This core network represents the most important bus routes in the region, and are generally characterised by a high frequency of bus services, high passenger volumes and with significant trip attractors located along the route. The identified core network comprises sixteen radial bus corridors, three orbital bus corridors and six regional bus corridors. While this network represents the core high frequency bus routes, it is supplemented by other bus services operating on lower frequency routes and by local buses running on other routes.

The Core Bus Network will serve significant origins and destinations in the Dublin Metropolitan Area and throughout the GDA, particularly those locations not directly served by rail and light rail. It will also provide greater opportunity for reliable and convenient interchange with these services.

In order to ensure an efficient, reliable and effective bus system, it is intended, as part of the Strategy, to develop the Core Bus network to achieve, as far as practicable, continuous priority for bus movement on the portions of the Core Bus Network within the Metropolitan Area. This will mean enhanced bus lane provision on these corridors, removing current delays on the bus network in the relevant locations and enabling the bus to provide a faster alternative to car traffic along these routes, making bus transport a more attractive alternative for road users. It will also make the overall bus system more efficient, as faster bus journeys means that more people can be moved with the same level of vehicle and driver resources.

5.5.1 Core Radial Bus Network

The core radial bus corridors forming the Core Bus Network for the region comprise the following routes:

- › Clontarf – East Wall;
- › M1/ M50 – Dublin Port Tunnel;
- 1 › Clongriffin – Artane – Fairview;
- 2 › Swords – Airport – Drumcondra;
- 3 › Ballymun – Phibsboro;
- 4 › Finglas – Phibsboro;
- 5 › Blanchardstown – Cabra – Stoneybatter;
- 6 › Lucan – Palmerstown – Kilmainham;
- 7 › Liffey Valley – Ballyfermot;
- 8 › N7/Clondalkin – Crumlin;

- 9 > Tallaght – Walkinstown – Crumlin;
- 10 > Tallaght – Rathfarnham – Terenure;
- 12 > Marlay Park – Rathmines;
- 13 > Bray/N11 – UCD – Donnybrook;
- 14/15 > Dun Laoghaire – Blackrock – Ballsbridge; and
- 16 > Ringsend – Pearse Street.

In the case of the “Ballymun – Phibsboro” corridor, this may be amended in conjunction with the development of new Metro North.

A map of the Core Bus Network Radial Corridors is shown below.

Figure 5.5 – 2035 Core Bus Network – Radial Corridors



To maximise the use of public transport infrastructure and minimise car dependence, higher densities and interactive mixed uses will be encouraged within walking distance of public transport corridors and nodes (rail stations and interchanges) and at other key locations such as key district centres.

It is the Policy of Dublin City Council:

- MT1:** To support the sustainability principles set out in the following documents:
- The National Spatial Strategy/National Planning Framework
 - The National Transport Authority's Transport Strategy for the Greater Dublin Area
 - Smarter Travel, A Sustainable Transport Future 2009–2020
 - Regional Planning Guidelines for the Greater Dublin Area
 - Design Manual for Urban Roads and Streets (DMURS)
 - National Cycling Policy Framework and National Cycle Manual

Also, to ensure that land-uses and zoning are fully integrated with the provision of a high-quality transportation network that accommodates the movement needs of Dublin city and the region.

It is an Objective of Dublin City Council:

MTO1: To encourage intensification and mixed-use development along existing and planned public transport corridors and at transport nodes where sufficient public transport capacity and accessibility exists to meet the sustainable transport requirements of the development, having regard to conservation policies set out elsewhere in this plan and the need to make best use of urban land. Dublin City Council will seek to prepare SDZs, LAPs or other plans for areas surrounding key transport nodes, where appropriate, in order to guide future sustainable development.

8.5.2 Promoting Modal Change and Active Travel

Increasing capacity on public transport including bus corridors, DART, suburban railway lines and Luas will continue to reduce the reliance on private car usage and provide opportunities for people to alter their travel behaviour and increase modal shift to more sustainable modes. Promoting modal change also encourages active travel (i.e. walking and cycling) in general and as a means to access public transport routes. Car clubs, whereby cars are rented for short periods, facilitate people who have limited need for a car and these clubs can help reduce car ownership levels and free up road space for more sustainable travel modes.

It is the Policy of Dublin City Council:

MT2: Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.

8.5.3 Public Transport

DCC policy on public transport will be implemented in collaboration with the NTA's Transport Strategy for the Greater Dublin Area 2016–2035. Key public transport elements of this strategy include:

- Metro North and South, and the DART expansion programme including DART underground

8.1 Introduction

The continued delivery of an efficient, integrated and coherent transport network is a critical component of the development plan core strategy. The strategy makes optimum use of existing and proposed transport infrastructure, and Dublin City Council works with the National Transport Authority (NTA) and relevant transport agencies to deliver key projects. Sustainable forms of transport such as public transport, walking, and cycling are strongly promoted in this plan, which takes a pro-active approach to influencing travel behaviour and effective traffic management. These are seen as important elements of a progressive policy that can contribute to climate change mitigation and a more sustainable city. A crucial factor in the discussion of movement



and transport is the challenge of tackling climate change. The Council shall use its powers to manage transport related spaces in the city so as to reduce transport-related emissions in the city area by at least 3% per year over the lifetime of the plan.

The context for transportation planning in the city has changed significantly in recent years and future public transport projects will now be guided by the National Transport Authority's Transport Strategy for the Greater Dublin Area (2016–2035). In addition to the above, a consultation draft 'Dublin City Centre Transport Study' has been developed jointly by Dublin City Council and the National Transport Authority and seeks to address the imminent transport issues facing the core city centre area for the 2015–2023 period. It contains specific proposals to improve public realm and prioritise public transport use and active travel.

An integrated approach to land-use and transportation generates efficiencies and helps to sustain and improve existing transport systems. Zoning objectives for the city have been developed with this in mind. Any plan or project, either individually or in combination with other plans or projects that has the potential to give rise to significant effects on the integrity of any European site(s), shall be subject to an appropriate assessment in accordance with Article 6(3) and 6(4) of the EU Habitats Directives.

- Luas to Lucan, Finglas and Poolbeg, and also Green Line enhancements
- Road link from the Port Tunnel to the South Port
- Bus Rapid Transit Network and also core Bus Network

Whilst delivery of these will take longer than the immediate development plan period, it is policy to protect route alignments from inappropriate development. The National Transport Authority and Transport Infrastructure Ireland will be consulted in relation to all significant proposals along these routes.

A number of key transport proposals have also recently been set out in the draft 'Dublin City Centre Transport Study', which has been jointly prepared by the National Transport Authority and Dublin City Council. Bus, rail, BRT, cycle and pedestrian network proposals are all included, along with specific measures central to achieving these, which focus on key city centre areas such as College Green, Westmoreland Street, D'Olier Street, Suffolk Street, St Stephen's Green North, the Quays, and



interchange locations. This has a clear focus on improving public realm in tandem with promoting both public transport and active travel. Dublin City Council will seek to influence the level of service and routing of public transport in the city and will safeguard lands required for future public transport corridors and nodes in association with appropriate zonings and land-use policies and objectives. Technical guidance and codes of practice for development alongside existing and proposed public transport route corridors should be observed.

The Council recognises that some areas of the city are currently better served by public transport than others and that a number of proposals under 'Transport 21' may not be realised. A large sector of the north city extending from the DART line on the eastern side to the Luas cross-city route on the western side lacks a rail or light rail corridor and would benefit from same in order to encourage modal shift and reduce congestion.

It is the Policy of Dublin City Council:

- MT3:** To support and facilitate the development of an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city in association with relevant transport providers, agencies and stakeholders.
- MT4:** To promote and facilitate the provision of Metro, all heavy elements of the DART Expansion Programme including DART Underground (rail interconnector), the electrification of existing lines, the expansion of Luas, and improvements to the bus network in order to achieve strategic transport objectives.

NTA commences third round of Consultation on the Sustainable Transport Corridors for Cork

Sustainable Transport Corridors a key element of the BusConnects Cork programme Preferred Route Options for Eleven sustainable transport corridors – Cork Updated proposals for eleven sustainable transport corridors as part of the BusConnects Cork programme have been published today by the National Transport Authority (NTA) for a third round of public consultation. The latest round...

6 November 2023

Bus

Bus Éireann announces improved services on Route 354 from Dunmore East to Carrick-on-Suir

Bus Éireann is pleased to announce improved services to Route 354 from Dunmore East to Carrick-on-Suir which came into effect on Sunday, 24th September. Connecting Ireland Rural Mobility Plan The significantly enhanced Route 354 is part of the Connecting Ireland Rural Mobility Plan, which is a major national public transport initiative developed and funded by...

28 September 2023

Bus

NTA publishes Annual Report for 2022

The National Transport Authority (NTA) has today published its annual report and financial statements for 2022. 2022 – a significant year for the NTA It was a significant year for the NTA with passenger numbers on public transport returning to and exceeding the record highs achieved, pre-Covid, in 2019. Key strategic planning milestones were achieved...

14 September 2023

Active Travel

Bus Éireann announces improved services and timetables on Route 270, Killarney to Skibbereen

Bus Éireann enhanced service and timetable this Sunday Bus Éireann is pleased to announce significantly enhanced services and timetable to Route 270, Killarney to Skibbereen which will come into effect this Sunday, 25 June. Route 270, Killarney to Skibbereen Funded by the Department of Transport through the National Transport Authority as part of the Connecting...

1 June 2023

Bus

TfL Local Link Galway launches new bus service connecting Tuam and Galway

TfL Local Link Galway is launching a new bus route which will improve connectivity between Tuam and Galway from 22nd of May 2023. This new route is part of the Connecting Ireland Rural Mobility Plan which is a major national public transport initiative developed and funded by the National Transport Authority (NTA) as part of...

16 May 2023

Bus

Bus services in Galway to increase by 50% under proposed new bus network

Bus services in Galway to increase by 50% under proposed new bus network Draft new bus network for Galway unveiled by NTA today Public consultation on the draft new bus network underway until Friday, 2nd June 2023 NTA Published the draft new bus network for Galway The National Transport Authority (NTA) has today published its...

24 April 2023

Bus

Bus services in Limerick to increase by 70% under new bus network plan

Bus services in Limerick to increase by 70% under new bus network plan Draft new bus network for Limerick unveiled by NTA today Public consultation on the draft new bus network underway until Friday, 7th April 2023 The National Transport Authority (NTA) has today published its draft new bus network for Limerick. The redesign of...

22 February 2023

Bus

New €20m BusConnects Bus Plaza opens at Liffey Valley Shopping Centre

New €20m BusConnects Bus Plaza opens at Liffey Valley Shopping Centre The National Transport Authority (NTA) today unveiled a new, €20m bus plaza facility at Liffey Valley Shopping Centre as part of the BusConnects programme being rolled out across the city. The new bus plaza, 100 feet from the front entrance of the Liffey Valley...

20 February 2023

Bus

GDA Transport Strategy provides framework for further investment in services and infrastructure

GDA Transport Strategy provides framework for further investment in services and infrastructure Provision of more public transport services will encourage further growth of people using sustainable and active travel across the region A substantial increase in the numbers of people using sustainable and active travel is among the primary objectives of the Greater Dublin Area...

24 January 2023

BusConnects

DÁIL ÉIREANN

AN COMHCHOISTE UM IOMPAR AGUS CUMARSÁID

JOINT COMMITTEE ON TRANSPORT AND COMMUNICATIONS

Dé Céadaoin, 4 Bealtaine 2022

Wednesday, 4 May 2022

Tháinig an Comhchoiste le chéile ag 1.30 p.m.

The Joint Committee met at 1.30 p.m.

Comhaltaí a bhí i láthair / Members present:

Teachtaí Dála / Deputies	Seanadóirí / Senators
Joe Carey,	Jerry Buttimer,
Cathal Crowe,	Gerard P. Craughwell,
Michael Lowry,	Timmy Dooley,
Steven Matthews,	Gerry Horkan,
James O'Connor,	Mary Seery Kearney.+
Darren O'Rourke,	
Ruairí Ó Murchú.	

+ In éagmais le haghaidh cuid den choiste / In the absence for part of the meeting of Senator Jerry Buttimer.

I láthair / In attendance: Deputies Emer Higgins and Brian Leddin and Senator Emer Currie.

Teachta / Deputy Kieran O'Donnell sa Chathaoir / in the Chair.

4 May 2022

Ms Anne Graham: We will know because there is, I suppose, an experiment happening now where we are seeing a 20% reduction on all fares and a significant reduction in terms of young adult fares – a 50% reduction off the adult fare being introduced this weekend. That will show whether people respond to those kinds of significant fare reductions, so we will be able to assess in general terms whether public transport customers or non-public transport customers will respond and use public transport based on that level of fare reduction. That information can be used to see what the impact could be if we extended the commuter zone boundary further.

Deputy Darren O'Rourke: Leap card and Leap card facilities need to be extended as well into these areas because that has a related and direct impact.

Ms Anne Graham: That will obviously be considered as part of any extension of the short hop zone.

Deputy Steven Matthews: I welcome Ms Graham and Mr. Creegan back to the committee again. They are always very willing to come in and we appreciate it. I thank them for that.

I will go straight to some questions on my area, which I know best. I was very pleased to see that electrification to Wicklow was included as part of the rail strategy under the great Dublin area, GDA, strategy. I know the planning process on that will go to railway order next year. Would it be sensible to include in the design whatever provision might be needed for extending that rail system to Wicklow as part of that rail order, in terms of whether it will be battery electric or full overhead electric?

Ms Anne Graham: I would ask Mr. Creegan to respond to that.

Mr. Hugh Creegan: The railway order going to An Bord Pleanála next year will be related to the coastal line. As the Deputy knows, that is looking at improvements as far as Greystones, in particular, to try to get a 20-minute DART service there. I would say it is not appropriate to amend that process at the moment. If the Deputy thinks about it in the following terms, we have to have a statutory basis to submit a plan to An Bord Pleanála and it is the new strategy that gives us that basis and it is not adopted yet. We are currently working off the old strategy. Having said that, putting in the extra infrastructure that is needed to run electric trains - if we can make it operationally work as far as Wicklow - is not a big task. In reality, it probably only requires a charging system at Wicklow station. There are operational challenges around making sure the train you want to extend to Wicklow is one with batteries on it as opposed to just pure electric. That is an operational challenge we will have to tease out with Irish Rail.

I would be reluctant to say it should be included in the railway order. I am much more comfortable in saying that it should be progressed as a parallel, separate project. It is a relatively small project that could be delivered in parallel. Therefore, including it or not does not necessarily impact the timeline.

Deputy Steven Matthews: Sure. If this strategy is approved by the Minister, and I would expect electrification to Wicklow will be included in an approved strategy, it would make sense at design stage to include whatever might be necessary, because there may be some requirement for some planning process to put in a charging system at Wicklow. I appreciate, and agree with Mr. Creegan, that it is a small enough task. Even full electrification to Wicklow, in terms of overhead, would be quite a small price tag compared to other transport projects. However, I would ask Mr. Creegan to consider whether it is sensible at this stage of going for design to include those aspects for Wicklow in it, because obviously the extension to Wicklow makes a

Appendix 2 Aarhus

The Aarhus Convention 1998 which is part of Irish law requires an open and transparent process on environment related decisions. It emphasises all options being left open and effective public participation. There were three separate phases of BusConnects, round one in November 2018 to February 2019, round 2 in March 2020 and round 3 in November 2020. It seems to me from responses to earlier planning submissions that NTA accept that Aarhus applies to these projects but that their case is that they have complied with it. I wholly disagree with any contention that what happens in practice came anywhere near complying with Aarhus. I say that Aarhus has not been complied with and that the only proper course open to the Bord is to direct a re-opening of consultation.

It is possibly arguable that the round one process was "vaguely" Aarhus compliant with numerous meetings between officials and residents groups with large attendances. However round 2 had virtually no consultation and the consultation in round 3 was a 2 hour Zoom meeting with a select audience. Because of the pandemic, the Aarhus authorities issued the Kazakhstan Advice, which I believe was ignored, not least by entirely excluding those with no internet access from a process.

The round one process

A document entitled Public Consultation Report (PCR) 2018 to 2022 tries to give the misleading impression by virtue of its length of 570 pages that there has been proper consultation on this process. I was involved in many of the meetings and I strongly contest that the meetings were a sham, that the public was treated with disdain by NTA and awkward questions were not answered.

The round one process was kicked off by the publishing in January 2019 (possibly 23 January per page 175 PCR) of a document entitled Kimmage Scheme. The January 2019 version included only one bus gate see page 148 with no hours of operation stated. This was of much less concern to me (and my community) as it did not impact access to any local facility in Kimmage village. The type on these documents was not clear as to right turns at Emmet Bridge and SCR. Page 164 of the PCR clearly states that "Now the bus journey from Kimmage to the City Centre takes up to 45 minutes. With the bus corridor, this journey will take less than 15 minutes". This was blatantly a false statement and is not borne out by the documents submitted to you.

There were then convened Community Forum meetings where representation was confined to a single representative from resident and community associations (page 185 PCR). The Community forum meeting for Kimmage took place at the Hilton Hotel on Monday 18 February 18.30 to 20.00 page 186 PCR. The notice for this issued on 7 February 2019 page 197 PCR which was inadequate and likely covered mid term break week. An hour and a half per meeting is manifestly grossly inadequate and unfair to the public. Meetings for two other corridors affecting the same area Rathfarnham to City Centre and Tallaght to Terenure took place the preceding and following Monday. In the case of Kimmage the community forum people were given 26 days to assess a very complex document. This was grossly inadequate. The Hilton Hotel, Charlemont Place venue was not readily accessible.

My recollection is that this meeting was fairly hostile. However this was to be expected at the first meeting where those who wanted to air views robustly were likely to air views. The process absolutely needed many more meetings where the more informed and rational people could air their views. It has been my experience that where residents groups have held meetings on BusConnects, the first meeting can include a lot of "hot air", but things settle down at subsequent meetings. It is wholly unsatisfactory that voluntary groups were able to hold as many meetings as required, but the "official" consultation was really just a single meeting.

It is evident that the NTA took no steps to identify affected groups but contracted this out to public representatives see page 188 PCR. I believe that many affected groups did not know about the proposals and indeed may still not know about them in 2023. There seems to be no reason why NTA should not have dropped a leaflet in every door with a few kilometre radius advising as to what was proposed and alerting people to meetings. This put well organized groups at a huge advantage.

I believe I was at each of the Community Forum meetings relevant to Terenure. They did not start on time. A lot of time was consumed by the top table talking down to the public. The so called "independent" chair was quite arrogant and seemed to adopt a role of protecting the NTA people rather than facilitating the public. When questions were taken, they were taken in batches of three. This meant that the NTA delegation could be selective about which questions they would answer. The Kimmage meeting was very heated (not least because the room was very warm) and a lot of people who wanted to have their say were denied an audience because the NTA people seemed to want to be out by 8. It was manifestly obvious that a number of further sessions were required, but they never happened. It is noted on page 200 that the purpose of the Community Forum is to facilitate a two way dialogue process; there was and has never been such a process; this is a misrepresentation. It is also noted that the minutes page 211 PCR included a "date of next meeting".

Minutes for the 18 February meeting are included in the PCR page 207 but they are sparse and attendees are redacted. Given the significance of the topic, much more comprehensive minutes recording questions and answers should have been produced. This was apparently issued on 30 April 2019 as the consultation closed see page 199 PCR.

As noted in the PCR at page 25 there was a public consultation "information event" at the Dublin City Council Civic offices on Tuesday 5 March 2019 from 3pm to 8pm. The photos on page 482 PCR are indicative of how these worked. Notice (grossly inadequate) of this was given on 4 March at 16.56 see page 198 PCR. I am not sure I actually attended that meeting. I note that discrimination was already creeping in as the three northside meetings were slotted in from 1pm to 9pm, this allowing lunchtime and after work attendance up to 9pm, whereas the southside corridors only got five hours. I am fairly certain from other meetings that the format of these was a bunch of people from NTA who could be asked questions but really were not prepared or able to give answers to any hard questions.

I would further note that three complex local corridors were dealt with over a period of less than a week between 5 March 2019 to 11 March 2019 so as to reduce the time available to people to become familiar with documents which were very complex. I think it was a gross abuse to fit three meetings affecting the same area into the same week. I note also that the Kimmage meeting was

not held at a convenient venue as City Offices could not be so regarded. All of this is not indicative of a body that was open to meaningful engagement.

The public consultation process was far too short (original deadline Friday 29 March 2019) and as usual with BusConnects, there had to be a huge effort involving public reps etc to get it extended. It was duly extended to 30 April 2019 see page 189 PCR. It is notable as part of the discrimination against the southside that the first batch of northside corridors were given an original consultation period of over three months November 2018 to 15 February 2019 see page 192 PCR.

Effectively the only way to make any suggestions about the scheme was to write in. It is clear from the PCR page 310 that 644 people did so. These submissions should have been put in the public domain for transparency but this never happened. NTA are now being obstructive on FOI requests seeking to access these documents and have chosen 8 December to revert to me. See attached emails.

There was a further community forum on 24 September 2019 but this was merely to lecture us on ideas that had come up and was not productive. The minutes were only sent out on 20 December 2019 page 314 PCR and they are heavily redacted. Again a further meeting is promised as happened before. I am not sure that I was made aware of or was present at the 24 September meeting.

Selective consultation in the first round

While this was likely more focussed on other corridors, residents groups in Terenure were looking for meetings. We had to put huge pressure on then Minister Eoghan Murphy to get what seemed a grudging audience with NTA on 10 April 2019.

It came as a surprise to me to see that another group Lower Kimmage Residents Association commonly known as LOKRA were accorded seven separate meetings. Five of these were in the first consultation between 2 April 2019 and 11 December 2019. One was just prior to phase 3 and the final one took place after the third round closed on 25 March 2021, so they were allowed a special opportunity not accorded to other groups. It is commonly believed that LOKRA want a quiet road on Lower Kimmage Road and they were badly impacted on round one by CPOs. If I were in their position, I would likely have sought adequate meetings and it is a matter of opinion as to whether a traffic free road or access matter more. It is however shocking lack of impartiality of NTA to have numerous meetings with this group, while ignoring everyone else. There is a complete lack of transparency around these meetings, but one suspects they resulted in a bus gate being imposed at Ravensdale Park, with dire consequences for areas to the immediate west and south of the bus gate.

A note on the LOKRA meetings in email format is annexed, as is a schedule of 35 separate documents, almost all related to the extraordinary attention paid to LOKRA .

The second round

It is clear that this was supposed to start much earlier. See page 288 PCR. The problem is compounded at this point for the Kimmage corridor, because in round 1 there was only one bus gate

adjacent to Mount Jerome. The move to three bus gates promulgated in March 2020 creates an awful lot of new problems, which were inadequately consulted. The brochure also slipped in a third bus gate (page 271 PCR) at the Hospice which is not flagged in the brochure at p 260 PCR.

There was no second round consultation at all as COVID became an issue rapidly after the launch of the document in early March. Effectively this stage consisted of a small number of written representations. It was in my view irresponsible of NTA to launch a consultation on 4 March 2020; there was awareness of a potential public health crisis and a responsible public body would have held on to see how things developed.

A consultation was scheduled for two corridors at Camden Court Hotel on Monday 23 March 2020 for 11.30 to 7.30 page 299 PCR. The more convenient venue and longer time is noted. The consultation never happened due to Covid. I note that all media was stopped on 18 March page 346 PCR, even though written submissions were still invited.

Third Round

This kicked off around 4 November 2020. All engagement was online. So effectively all those not computer literate were excluded. This seems to be contrary to the Kazakhstan ruling of the Aarhus governing body. I am told that quite a number of my neighbours are not computer literate and were therefore arbitrarily excluded from the process. These are exactly the people who go to shop in Kimmage or go to Mass in Mount Argus and are car dependent. These people were cut off once the scheme went entirely online. Many of them would have wanted to be included. It is a gross breach of their rights that they were excluded. They now have to pay €50 to have their say.

The time periods were grossly inadequate with consultation on a complex plan closing on 16 December 2020. The NTA seem to disregard the fact that even in COVID times, people have other things to do.

To add insult, the desultory meeting about the Kimmage corridor took place on 10 November 2020, only registered groups were invited and inadequate notice was given. It was the first meeting to happen across all corridors and again other relevant meetings followed quickly. This was less than a week after launch and notice was given on 6 November 2020 at 16.49 page 428 PCR and you had to register by 2pm the following Tuesday. There is no universe where this would be regarded as proper notice of a meeting to the affected community. The time given for the meeting was inadequate one and a half hours.

The usual inadequate process happened at the online meeting, questionable independence of chairing, lots of time talking down to the audience, three questions in one go, not addressing awkward questions. Again the minutes are heavily redacted page 438 PCR and there are no notes of content at all.

In effect the only way to participate was by going into print within a very short deadline. These submissions have been concealed from the public. An effort was made through political channels to have the deadline extended beyond Christmas, but NTA refused to do so.

It is noted that other groups were given meetings after consultation closed including Stannaway

Road Residents and Kimmage Business Group. I think this happened because these groups while very badly affected by the proposals were simply not aware of them until all three stages of the

process had closed. This is a damning indictment of the failure of NTA to notify their plans properly. Apart from some groups in Phibsborough, Ballsbridge Terenure and Nutley these seem to be the

only groups facilitated beyond the closing date applied to everyone else. I have no objection to these groups being so facilitated, but the whole process should have been re-opened for relevant

corridors if the procedure was fair, with disclosure of the fact of those meetings.

It would therefore be my position that the process around the Kimmage corridor was in flagrant breach of the Aarhus convention. I believe that to assess this application properly the Bord needs to assess whether my case that Aarhus has not been complied with or NTA's weak argument that it has set out in responses on other applications is correct. I would strongly submit that there is non-compliance. It is in my view open to the Bord to direct them to conduct a properly compliant

procedure, where they listen with an open mind and treat the public with respect.

Aarhus Article 6.4 also clearly requires the making available and assessment of alternatives. It is blindingly obvious that metro to the south west city is an alternative. This has not been properly examined or indeed examined at all. Luas lines along the route of this and the Templeogue Rathfarnham corridors are clearly envisaged by the drawings in the Greater Dublin Area Transport Plan to 2042. The option of building this now ought to be examined in the documents but is not. The option of keeping the current 49 and 150 routes on their current corridor of Harold's Cross Road and Kildare Road respectively ought to have been considered but is not.

I should also note as discussed elsewhere that critical traffic data has been prepared by two different companies with those for the south side corridors being difficult if not impossible to navigate. The NTA have been obstructive in producing comparable quality information on traffic counts.



Brendan Heneghan <brendanheneghan@gmail.com>

FOI request 2023-0134 - Kimmage Corridor

Tracy Sweetman <Tracy.Sweetman@nationaltransport.ie>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Tue, Nov 7, 2023 at 6:36 PM

Re: FOI request 2023-0134

Dear Mr Heneghan,

I refer to your request, received on Friday 6 October 2023, made under the Freedom of Information Act 2014, for records held by the National Transport Authority. Your request sought:

"All submissions made to the NTA in the three stages of consultation on this scheme that refer to the section of the corridor on the Lower Kimmage Road from the Kimmage Cross Road junction (at Terenure Road West) to the entrance to the Hospice at Harold's Cross."

I, Tracy Sweetman, have now made a final decision to refuse your request on 7th November 2023. The purpose of this letter is to explain the decision.

Findings, particulars and reasons for decisions to deny access

Section 15(1)(c) states that an FOI request may be refused if:

"in the opinion of the head, granting the request would, by reason of the number or nature of the records concerned or the nature of the information concerned, require the retrieval and examination of such number of records or an examination of such kind of the records concerned as to cause a substantial and unreasonable interference with or disruption of work (including disruption of work in a particular functional area) of the FOI body concerned"

In respect of your request I have searched the relevant locations and consulted with colleagues in the NTA and I can confirm that significant records exist, for which the retrieval and examination of would impose unreasonable interference with work of the FOI body. Processing the request as currently worded would have a significant impact on the work of the Transport, Planning and Investment Directorate in that a significant amount of time and resources would be required to search, collate, review and redact (if required) the documents/ records subject to the request. As the work of the Directorate is involved in progressing a number of key elements of the National Development Plan, I am of the view that the processing of the request as is would impose significant and unreasonable interference with the work of the NTA and in particular of the work of the Transport, Planning and Investment Directorate.

On 18th October 2023, I contacted you by email and advised you that the request, as it currently stood, was likely to be refused as a potentially voluminous request under Section 15(1)(c) of the Freedom of Information Act 2014 in that it potentially related to a significant number of records. During that email exchange, you were offered an opportunity to refine your request under section 15(4) so that it would no longer fall within Section 15(1)(c) of the Act.

You did not refine the request and therefore the request falls within the scope of the aforementioned Section 15(1)(c) of the Act.

The above notwithstanding, and in line with the provisions of Section 15(4) of the Act, the NTA would like to assist you to the fullest extent possible and as such we respectfully suggest that you amend your request such that it reflects information which is accessible.

If you wish to resubmit your request, please email it directly to me at tracy.sweetman@nationaltransport.ie.

Decision

In accordance with the requirements of section 15(1)(c), I am satisfied that all reasonable steps have been taken to process the request and must therefore refuse your request for the reasons set out above.

Publication

Details of all non-personal FOI requests will be recorded on an FOI disclosure log which will be published on the NTA website in due course.

Rights of Review

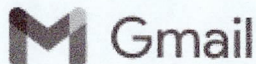
In the event that you are not happy with this decision you may seek a review of this decision by writing to the Freedom of Information Unit, foi@nationaltransport.ie, seeking an internal review of the matter and referring to or enclosing a copy of this letter. Please note that a fee applies for such a review. The level of this has been set at €30 (or €10 for Medical Card holders) and payment should be made by way of bank draft, money order or postal order, and made payable to "National Transport Authority".

You should submit this within 4 weeks from the date of this notification, where a day is defined as a working day excluding the weekend and public holidays. The making of a late appeal may be permitted in appropriate circumstances. The review will involve a complete reconsideration of the matter by a more senior member of the staff of this body and the decision will be communicated to you within 3 weeks.

Yours sincerely,

Tracy Sweetman

From: Brendan Heneghan <brendanheneghan@gmail.com>
Sent: Saturday 28 October 2023 09:25
To: Tracy Sweetman <Tracy.Sweetman@nationaltransport.ie>
Subject: Re: FOI request 2023-0134 - Kimmage Corridor



Brendan Heneghan <[REDACTED]>

FOI request 2023-0134 - Kimmage Corridor

Brendan Heneghan <[REDACTED]>
To: foi@nationaltransport.ie

Fri, Nov 10, 2023 at 4:04 PM

I would like to seek a review of the refusal of the below request 2023-0134 . I am sending a copy of this email to you with a postal order for €30, which you should receive Monday.

I did seek to clarify my request but my response crossed with the refusal.

I would note that in the Public Consultation Submission Reports contained on the kimmagescheme.ie website, you identify sections 1 and 2 of the scheme (which are also referred to as A and B to confuse things) which are pretty well what I refer to. On the first round consultation you clearly identify that there were 18 submissions on section 1 (or A) and 188 submissions on section 2 (or B). I cannot see how the author of the report could have come up with those precise numbers without having a file with 18 or 188 documents identified as relevant. The same goes for the reports on the second and third phase. In the third consultation phase the balance of comments is virtually the same but with the big number on section 1 (186) and little on section 2 (8).

I cannot accept how it would be a substantial and unreasonable interference with or disruption of work of NTA under 15(1)(c) to produce the files with those 18 and 188 documents and the equivalent on rounds 2 and 3. Further this is a discretionary power (use of the word may) and it would seem to me eminently reasonable for an affected member of the public to have access to those records to understand the background to very material changes.

There was a very material change highly adverse to me and my area after consultation round 1. I think it was unreasonable in any event that these submissions were not put on public display, as is the case with submissions on the same issue to An Bórd Pleanála.

Brendan Heneghan
[Quoted text hidden]



Brendan Heneghan <[REDACTED]>

NTA: Acknowledgement of your Internal Review request on FOI 2023-0134 - Kimmage Corridor

1 message

Freedom of Information NTA <FreedomofInformation.NTA@nationaltransport.ie>

Fri, Nov 24, 2023 at 4:58 PM

To: Brendan Heneghan <[REDACTED]>

Cc: Freedom of Information NTA <FreedomofInformation.NTA@nationaltransport.ie>

Re: Acknowledgement of receipt of appeal for FOI Request 2023-0134

Dear Mr Heneghan,

I refer to your request dated Friday 6 October 2023 made under the Freedom of Information Act 2014 for records held by the National Transport Authority (NTA). Your request sought:

"All submissions made to the NTA in the three stages of consultation on this scheme that refer to the section of the corridor on the Lower Kimmage Road from the Kimmage Cross Road junction (at Terenure Road West) to the entrance to the Hospice at Harold's Cross."

Your correspondence and fee seeking a review of the decision in relation to your request for records was received by the NTA FOI Unit on Friday 17 November 2023.

A final decision on your appeal will be sent to you within 3 weeks of receipt of your appeal which is the minimum amount of time required to efficiently complete the 'search and retrieval' work on your request. This means that you can expect to receive a new decision on your request by Friday 8 December 2023.

In accordance with Section 19 of the Act where notice of the decision is not given within the appropriate timeframe you are automatically entitled to appeal to the Information Commissioner for a review of the matter. This review proceeds on the legal basis that the original decision is considered to be affirmed on review once the specified time for responding to it has expired. An 'application for review' should be made no later than 6 months from the date of this notification. In your application for review you should state that you are appealing because a review decision was not made within the time permitted. There is a fee of €50 and €15 for medical card holders. Payment should be made by way of bank draft, money order, postal order or personal cheque: crossed and made payable to the 'Office of the Information Commissioner'.

Alternatively you can make payment on-line which can be located at: <https://www.oic.gov.ie/en/Apply-for-Review/Fees-Payable/>.

Should you wish to make such an 'applications for review' in writing, please use the details below:

The Office of the Information Commissioner

6 Earlsfort Terrace,

Dublin 2,

D02 W773

Alternatively you may appeal using the Information Commissioner's on-line application form which can be located at:

<https://www.oic.ie/apply-for-a-review/start-application/>

If an application for review is made by you and accepted, the Information Commissioner will fully investigate and consider the matter and issue a fresh decision.

Publication

All non-personal FOI requests will be recorded on an FOI disclosure log which will be published on the NTA website in due course.

Should you wish to discuss the above, please contact me at foi@nationaltransport.ie

Yours sincerely,

Neil Doherty
FOI Unit



Neil Doherty (he/him/his)

Senior Public Affairs Officer

National Transport Authority | Údarás Náisiúnta Iompair

A: Dún Scéine, Iveagh Court, Harcourt Lane, Dublin 2, D02 WT20

E: Neil.Doherty@nationaltransport.ie

W: www.nationaltransport.ie

In accordance with NTA's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours.

From: Tracy Sweetman

Sent: Tuesday 7 November 2023 18:37

To: Brendan Heneghan <[REDACTED]>

Subject: RE: FOI request 2023-0134 - Kimmage Corridor

Re: FOI request 2023-0134



Brendan Heneghan <brendanheneghan@gmail.com>

Consultation with LOKRA

1 message

Brendan Heneghan <[REDACTED]>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Sat, Dec 2, 2023 at 9:08 PM

On foot of an FOI request made on 3 October 2023 by me related to meetings with LOKRA and Stannaway residents, I was furnished with 35 separate documents, all of which show the extraordinary attention given by NTA to Lower Kimmage Road Residents' Association ("LOKRA"). By contrast a single one of those documents, document 35, relates to a meeting with Stannaway Road, a road likely to be badly affected by traffic diverted to facilitate a bus gate blocking Lower Kimmage Road. It is a sparse four pages with two pages not copied correctly and virtually no content. While the whole team were wheeled out for LOKRA on several occasions, only Hugh Creegan seems to have done the meeting with the Stannaway group.

The following points are evident from the voluminous documents.

1 Document 1 is a 33 page script (likely audio) of a meeting with LOKRA on 5 April 2019, which must have gone on for some hours. Notably the "obviously unimportant to NTA" Stannaway Group were not accorded the same treatment of a audio transcript.

2 Document 4 contains a fascinating analysis of 941 bus journeys in the period from February to April 2019 which shows the vast majority of journeys completed in 20 minutes or less. This page is annexed.

3 Document 5 is a LOKRA submission of 16 December 2020, but unlike any other party they seem to have been allowed update their document in May 2021 after consultation was closed (as the front page has "updated 4th May 2021" on it). This facility was not extended to any other local group.

4 Document 7 is a presentation made only to LOKRA on 16 July 2019 with the Ravensdale bus gate. This suggests that it emerged in July 2019, with LOKRA informed in preference to others. Other later documents suggest concern about a leak of this to the Irish Times.

5 Document 8 purporting to be a handwritten minute of the 16 July 2019 meeting has a comment "Peak time bus gate - potentially [against -word illegible] businesses. This is a clear indication that NTA knew this was a severe problem for businesses.

6 Document 9 shows that all of Hugh Creegan, John Fleming, Aidan Gallagher, Colm Griffin and Grainne Macken were at the 16 July 2019 meeting. Document 21 also discloses 5 NTA persons at meetings on 20 September and 11 December 2019. Attendees at other meetings were not disclosed or redacted.

Document 11 notes the willingness of NTA to meet after hours and also anticipate the likely strong opposition to restrictions on general traffic.

8 Document 14 shows that NTA were discussing with LOKRA exclusively measures likely to be highly prejudicial to other roads, including Fortfield Road being used as a way to evade bus gate and a ban on turns into Greenlea and Lavarna, all highly prejudicial to my area. They should have been discussed with my residents group, if the process were fair.

9 Document 18 on Roughan O'Donovan (an NTA adviser) memo paper seemingly recording a meeting noted at point 11 Community Forum "lighter level of detail than today. Both presentations will be released publicly". This implies others were to be kept in the dark (lighter level) on relevant points, despite the Community Forum being designed for input from representatives of affected groups.

10 document 29 which seems to be an NTA note indicates that the public don't understand how the busy Kenilworth junction will work and says "we need to carefully explain this in the application documents". This commitment is not followed through in the application - indeed the permission may be applied for in the Templeogue Rathfarnham application, to which it is not really relevant. Document 34 in the same context says "we need to make sure we provide good detail for inclusion in the TIA/EIAR".

11 Document 35, the Stannaway minute indicates that Mr Creegan was "willing to include measures" with 9 items listed. None of these are in the planning application.

What all of the documents supplied show is that an extraordinary level of detail was discussed with a single group, representative of a single road, even though it is manifestly obvious that many of the items discussed were far more relevant to other groups. This practice seems highly unfair. Some if not all of these groups would have registered as Community Forum members and NTA could have called them in for discussion on issues but chose to ignore them.

I submit that a proper consultation process compliant with natural justice and fairness rules would have included all parties and not merely LOKRA, before any decision was made.

I am attaching some relevant pages from the documents furnished to me. I suggest you request a full copy from NTA (as it is very voluminous to copy).

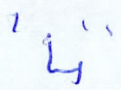
LOKRA FOI LIST

Schedule of records - FOI 2023-0130

Record	Document/record	Decision	Basis for Refusal - Exempt under FOI Act 2014	Record Edited/ Identify Deletions	Format
01.	NTA LOKRA Meeting Transcript (05 April 2019)	Part-grant	Section 37 (1)	Personal Information	PDF
02.	LOKRA - Summary of Commitments and Clarifications to NTA (LOKRA North 05 April 2019) and (LOKRA South 15 April 2019)	Grant	N/A	N/A	PDF
03.	LOKRA Letter to NTA (18 April 2019)	Part-grant	Section 37 (1)	Personal Information	PDF
04.	LOKRA CBC 11 Submission to NTA (30 April 2019)	Grant	N/A	N/A	PDF
05.	LOKRA CBC11 3rd round Public Consultation Submission - Corrected or Clarified (04 May 2019)	Grant	N/A	N/A	PDF
06.	Summary of LOKRA Public Consultation submissions to NTA (15 July 2019)	Grant	N/A	N/A	PDF
07.	BusConnects Bus Gates Presentation to LOKRA (16 July 2019)	Grant	N/A	N/A	PDF
08.	NTA LOKRA Meeting Minutes (16 July 2019)	Part-grant	Section 37 (1)	Personal Information	PDF
09.	NTA LOKRA Consultation - ROD Meeting Minutes (16 July 2019)	Part-grant	Section 37 (1)	Personal Information	PDF
10.	LOKRA Preliminary Response to NTA Meeting (16 July 2019)	Grant	N/A	N/A	PDF
11.	LOKRA Email Correspondence to NTA (19 July 2019)	Part-grant	Section 37 (1)	Personal Information	Email converted to PDF
12.	NTA Response to LOKRA questions and slide	Part-grant	Section 37 (1)	Personal Information	Email converted to PDF
13.	LOKRA Email Correspondence to NTA – Meeting Agenda, Bus Gate slide (19 September 2019)	Part-grant	Section 37 (1)	Personal Information	PDF

Record	Document/record	Decision	Basis for Refusal - Exempt under FOI Act 2014	Record Edited/ Identify Deletions	Format
14.	LOKRA Correspondence to NTA – Bus Gate Maps (19 September 2019)	Grant	N/A	N/A	PDF
15.	LOKRA Meeting Agenda with NTA (20 September 2019)	Grant	N/A	N/A	PDF
16.	NTA LOKRA Briefing Presentation (20 September 2019)	Grant	N/A	N/A	PDF
17.	NTA LOKRA Meeting Minutes combined (20 September 2019)	Part-grant	Section 37 (1)	Personal information	PDF
18.	ROD LOKRA Meeting Minutes (20 September 2019)	Part-grant	Section 37 (1)		PDF
19.	LOKRA Core Group Response to NTA and Meeting Request (08 October 2019)	Part-grant	Section 37 (1)	Personal information	PDF
20.	LOKRA response to NTA following meeting of 20 September 2019 and Community Forum on 24 September 2019	Grant	N/A	N/A	PDF
21.	ROD LOKRA Consultation Meeting Summary Notes (20 September 2019 and 11 December 2019)	Part-grant	Section 37 (1)	Personal information	PDF
22.	BusConnects NTA CBC Residents Group Draft Schedule (October 2020)	Grant	N/A	N/A	PDF
23.	BusConnects Zoom briefing meeting invitation with LOKRA (15 October 2020)	Grant	N/A	N/A	PDF
24.	BusConnects Core Bus Corridors – Community Forum Webinar Protocols	Grant	N/A	N/A	PDF
25.	(i) NTA LOKRA Meeting Minutes (22 October 2020)	Part-grant	Section 37 (1)	Personal information	PDF
	(ii) NTA LOKRA Meeting Minutes (22 October 2020)	Grant	N/A	N/A	PDF

Record	Document/record	Decision	Basis for Refusal - Exempt under FOI Act 2014	Record Edited/ Identify Deletions	Format
26.	BusConnects Core Bus Corridors Community Forum Schedule (November – December 2020)	Grant	N/A	N/A	PDF
27.	BusConnects Dublin – Kimmage to City Centre CBCs Community Forum Webinar Tuesday, 10 th November 2020 (06 November 2020)	Grant	N/A	N/A	PDF
28.	BusConnects Dublin – Launch of Third Round of Public Consultation for CBCs (Bus Priority & Cycle Lanes) (04 November 2020)	Grant	N/A	N/A	PDF
29.	NTA LOKRA Meeting Notes (22 October 2020 and 25 March 2021)	Part-grant	Section 37 (1)	Personal information	PDF
30.	NTA LOKRA Residents Meeting Memo (11 December 2019)	Grant	N/A	N/A	PDF
31.	LOKRA BusConnects Corridor 11 Q4 2020 Survey Responses (Summary)	Grant	N/A	N/A	PDF
32.	BusConnects Zoom Meeting Invitation with LOKRA	Part-grant	Section 37 (1)	Personal information	PDF
33.	NTA LOKRA Meeting Attendance List (25 March 2021)	Part-grant	Section 37 (1)	Personal information	PDF
34.	LOKRA Consultation (26 March 2021)	Part-grant	Section 37 (1)	Personal information	PDF
35.	NTA Stannaway Road Residents' Group Meeting Minute	Part-grant	Section 37 (1)	Personal information	PDF

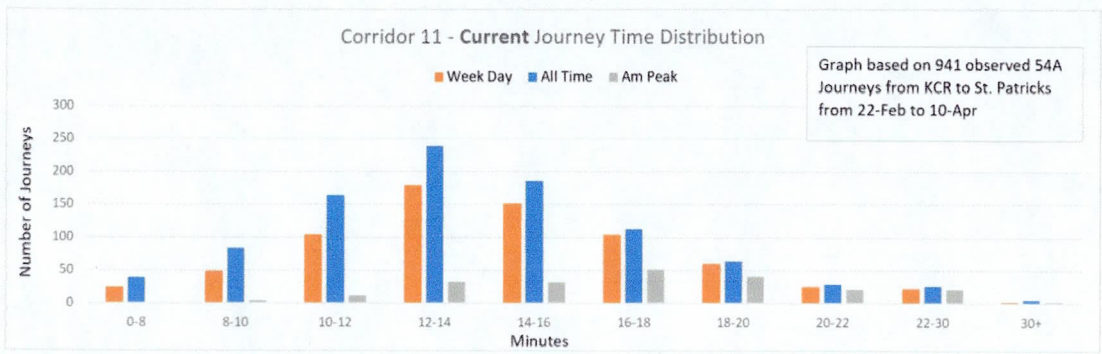


2.2 Current Bus Journey Times

While understanding that the proposed number of buses do not bring any additional net benefits to the community (or commuters) in terms of numbers we additionally undertook to review the case for improved speed as a compensation measure for the imposition upon the community.

To complete this we undertook a detailed and comprehensive review of current bus journey times from KCR to St. Patrick’s Cathedral – the number 54a route from stop 2438 to 1345. Data was compiled from a total of 941 bus journeys across 33 continuous days from 22nd February to 10 April 2019 using information available from the RPTI realtime bus journey information system. It was further verified by 22 individual “in person/on bus” timings to confirm accuracy.

The results of these journey times, along the route are summarized as follows:



From this analysis we can see that:

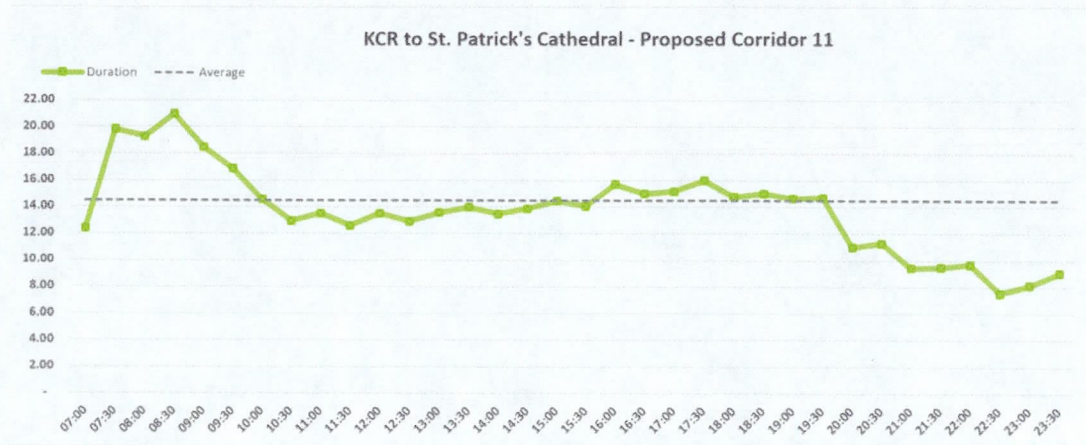
- currently 94% of all journeys are completed within less than 20 minutes
- over 80% of all peak-time (Mon-Fri, 7am – 10am) journeys are completed in less than 20 minutes
- Out of 941 journeys reviewed only 2 (0.002%) took longer than 30 minutes

These journey times differ from the NTA claim on page 12 of the Core Bus Corridor 11 Information Brochure that:

- Current bus journey time: up to **45 mins**
- BusConnects journey time: **12-15 mins**
- Future Bus journey time without BusConnects: **55 mins +**

When further analysed by time of day the results presented as:

1, 2, 3



The **average weekday** journey time across all journeys was **14 minutes**.

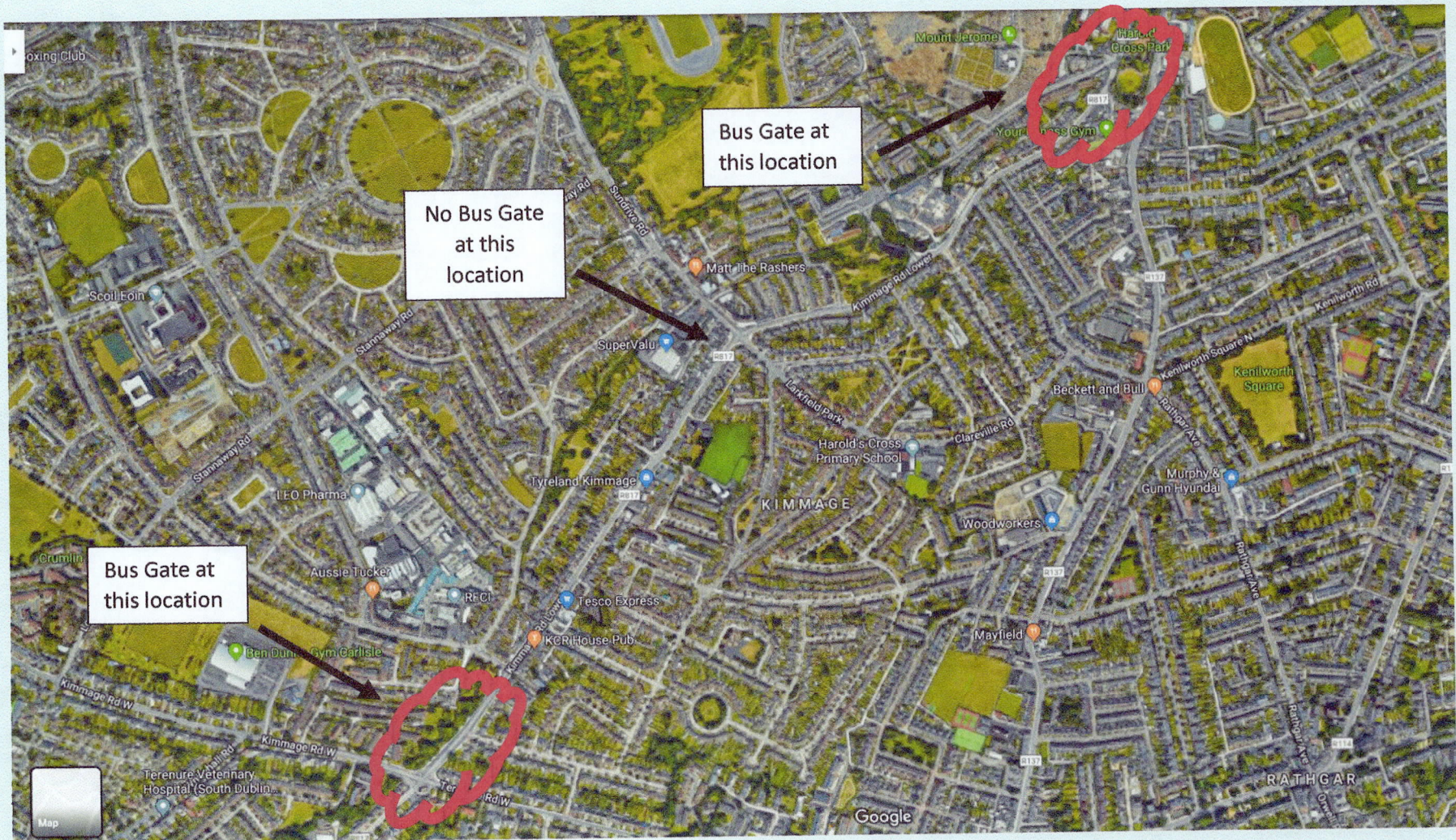
This compares extremely favourably to the NTA's target times of 12 – 15 minutes post Bus Connects. In fact a full 66.5% of all journeys were completed within this target time.

Outside of morning peak hours bus journey times are on average comfortably within NTA targets for improvements.

LOKRA are of the view that the rationale for the destructive landtake requirements and community severance impacts imposed by the current CBC plans are not warranted for a bus system which does not appear to be under undue stress.

On this basis we would urge the NTA to consider less destructive proposals to achieve bus journey time improvements.

Lower Kimmage Road

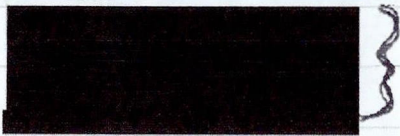
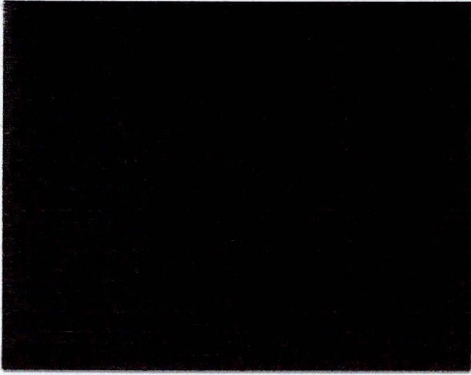


r.f.

Log 11

16/7/2011

LOKPA - URBAN REALM



* Pedestrian Crossing * Multiple

* Table * at entrances

Pedestrian Movements.

Visitor Policy

Unusual green area (Lower park)

Goals → Zoned residential.

Peak time bus gets → Potentially avoid busier areas

Furrows access via Saddle

South Dublin Villages Network.

33 | 11

From: [Grainne Mackin](#)
To: [Hugh Creegan](#); [John Fleming](#); [Aidan Gallagher](#); [Colm Griffin](#)
Subject: Thanks
Date: Wednesday 17 July 2019 11:44:31

From: [REDACTED]
Sent: 17 July 2019 10:59
To: Grainne Mackin
Subject: Thanks

Hi Gráinne

A note, on a purely personal basis, to say thanks for the meeting last evening. I want to acknowledge the scale of the NTA's decision to move away from road widening. I absolutely believe that it's the right thing to do - not because of [REDACTED] (that really is a secondary consideration for me), but because of the environment, built and natural and because it's inconsistent with a "fewer cars" policy. I think that the proposals for the village / cross roads are excellent both in their own right and as a demonstration that BC can be about more than just buses. It would be brilliant if the no parking on the east side option could be achieved but fear that its dependence on land acquisition may scupper it.

Restrictions on general traffic on LKR south is likely to face strong opposition. I'm hopeful that LOKRA and other local RAs will support it - but it's not something that we should rush as doing so risks being counter productive ultimately. [This](#) is the article in yesterday's IT that I referred to at the meeting. Whilst not directly relevant it illustrates how irrational the discussion around cars can sometimes be.

Finally I want to record my appreciation for the team's willingness to meet after normal hours. It's not a small thing. Please pass on my thanks.

[REDACTED] ards
[REDACTED]

" 14 "

	Like BLUE, the concern here is that the traffic could detrimentally impact on the "Quiet Road" status of KRL South. There is also concern for additional traffic on what are very narrow residential roads leading to Mt. Tallant as well as Mt. Tallant itself.
PURPLE	Illustrates how it is possible to bypass the KCR Bus Gate at B via Hazelbrook & Corrib. Have the NTA considered how to prevent this?
AMBER	This shows the access routes to the City for traffic arriving at KCR. LOKRA understands that Fortfield Rd is being presented as a route around the proposed inbound bus gate on Terenure Road East and that right turns onto Greenlea & Lavarna are to be prohibited. How has the NTA prepared to rebut what are likely to be serious challenges to this proposal?

Contact Name	Organisation	Date	EventType	EventText	EventTitle
[REDACTED]	LOWER KIMMAGE ROAD RESIDENTS' ASSOCIATION	22/10/2020	Meeting	<p>meeting held with a delegation from lokra to brief them about the most recent developments that will be published for public consultation no.3 in early november. the focus was on the public realm proposals at sundrive cross (kimmage village).</p> <p>nta was represented by hugh creegan john fleming grainne macken aidan gallagher and derek taylor. seamus mac gearailt represented the design team of rod-typsa.</p> <p>time: 18:00 to 19:10 by zoom.</p> <p>added by: seamus mac gearailt (2020-10-28)</p>	Briefing Meeting with LOKRA
[REDACTED]	LOWER KIMMAGE ROAD RESIDENTS' ASSOCIATION	25/03/2021	Meeting	<p>meeting with lokra group: [REDACTED] and others.</p> <p>nta: hugh creegan derek taylor grainne macken and malachy hand - [REDACTED] for rod-typsa</p> <p>from 16:00 to 17:30</p> <p>notes by [REDACTED]:</p> <ol style="list-style-type: none"> [REDACTED] updated on the small number of changes since the last consultation with cycle track routed around poddle park rather than through it which was welcomed and ongoing junction design developments. sundrive cross: residents would prefer a few more on-street parking spaces even if this would reduce the number of new trees. left-turn restriction from sundrive road into lkr northbound: the residents of lkr have sought this to direct through traffic away from their streets in the context of reduced routes out of the area. they did not seem concerned about the impacts of diverting this traffic onto the neighbouring streets of larkfield avenue/park and clareville road past the 2 primary schools. poddle greenway link from sundrive road to mount argus view: the residents advised that there are significant local objections to the proposal to open up this link. harold's cross park area: access to the new primary and secondary schools at the greyhound stadium needs to be assessed for cyclists from the kimmage area. kenilworth junction: the public don't fully understand how this busy junction will work in future under changed traffic load. we need to carefully explain this in the application documents. 	Consultation by Zoom

52.1

Appendix 3 The flawed planning application process

There have been three separate deficiencies in the planning process on the part of NTA.

There is a very simple requirement that NTA must produce four completely identical copies of the same document, two in hard copy for inspection at your offices and theirs and two in soft copy for your website and for the website entitled kimmagescheme.ie.

There is also a very simple requirement to follow to the letter a document called "Kimmage Site Notices" which I believe reflects an agreement with you as to what site notices are to contain and where exactly they are to be erected. I find it unsatisfactory that the location of site notices was not checked for correctness by a very senior NTA person very early on in the process.

There is a letter on your public file dated 27 July 2023 noting eight separate issues apparently affecting soft copies namely

Volume 1 Preface incorrect data

Non technical information incorrect data

Volume 2 Chapter 11 cross referencing errors

Volume 2 Chapter 21 cross referencing errors

Mitigation cross referencing errors

Volume 3 Chapter 6 Incorrect figures

Volume 4 Appendix A9.1 formatting

Volume 4 Appendix 3 formatting

This has never been flagged to the public. While I received an email about this, I only have NTAs word that there was no misinformation in what the public saw online. I believe that given discrepancies in earlier scheme applications, the application should have been rejected and NTA should have been required to re-file.

It is clear that NTA also did not comply with the simple document around placing of site notices. On September 14 community forum members received an email advising that "two of the non statutory site notices had been erected in the wrong locations along the Kimmage to City Centre Core BusCorridor Scheme". This issue was apparently rectified on 18 August 2023. The net effect of this was an extension of time for comment from 26 September 2023 to 7 November 2023. There is no indication whatever of what two notices were wrongly erected. Further on the scheme website, the document indicating the location of notices is headed "Kimmage_Site_Notices_Updated_26_October_2023" which begs the questions as to whether there are further changes that no one has been told about. Indeed "Revised 26/10/2023" appears on the face of the document. Given the earlier eight errors and the site notice error, I believe the application should have been rejected at that time.

On an inspection at your offices on 29 September 2023 I noted that Volume 4 TIA Appendix 2 – Junction Design Report was not available for inspection on your file as required. I sent an email that day to NTA. This resulted after a month in this document being made available and a further period of time out to 8 December 2023 for public comment.

The process has been wholly unsatisfactory in that persons affected have been working to a deadline of 26 September, then 7 November and now 8 December. This is very wearying even for those very engaged in the process. This sort of messing is a hindrance to proper public engagement.

It is also my impression locally that a lot of people see site notices and that alerts them to schemes. If some site notices were in place in July 2023 and others in place only from 18 August 2023, there is an inequality of treatment for those the “victims” of the incorrect location. And then there is the question of the 26 October revision.

It is my submission that these provisions require strict compliance and that the cumulative effect of three separate sets of errors by the applicant are such that the application must be regarded as defective

LEGAL ISSUES RELATED TO THE ABOVE

It is my submission that on account of the deficiencies repeated on two occasions in compliance with the process, the application is wholly invalid and that planning consent cannot be properly given.

I also have a general concern that the level of notification to the public seems inadequate and I note the very limited number of public notices placed on roads and related to the scheme.

I have reviewed three Irish academic works with which I am sure the Bórd are familiar that deal with the application process

Scannell Environmental and Land Use Law 2006 Thomson Round Hall

Gore Grimes Planning and Environmental Law in Ireland 2011 Bloomsbury

Simons on Planning Law 2021

Scannell I while being the oldest is the one that deals at greatest length with issues related to the application process.

While there are numerous cases on technical issues in the application process, four decisions all at Supreme Court seem relevant

Monaghan UDC v Alf A Bet [1980] ILRM 64

ESB v Gormley [1985] IR 129

Crodaun Homes v Kildare County Council [1983] ILRM 1

White v Dublin City Council [2004] 1 IR 543

The facts of the cases are not particularly in point, but principles expressed certainly are in point

Scannell suggests (para 2.209) that the best statement of the purpose of public notices is by Griffin J in *Alf A Beta* being to “ensure that adequate notice is given to the members of the public who may be interested in the environment or who may be affected by the proposed development, that permission is sought in respect of that development, so as to enable them to make such representations and objections as they may consider proper”.

Also in *Crodaun* it was stated that the location of the proposed development must be correctly and accurately described so as to satisfy both the letter and spirit of the regulations and to be readily and easily identifiable (Scannell 2-210)

Scannell also states that public notices must indicate that the application may be inspected at the office of the relevant planning authority. This requirement is to provide for public participation in the decision making process and to increase transparency in decision making.

Scannell cites the then Planning Regulations Articles 19 and 26 as providing that a site notice that is misleading or inadequate to inform the public renders the application invalid.

At paragraph 2-221 Scannell states that the courts are very likely to declare applications invalid if there is evidence that any person has been misled or disadvantaged by the non compliance, especially if the effect of this is that the planning authority make a decision which might have been different if the regulation had been strictly complied with”

At paragraph 2-235 she cites *Henchy J in Alf A Bet* as the authority on the effect of non compliance “When the 1963 Act prescribes certain procedures as necessary to be observed for the purposes of getting planning permission, which may affect radically the rights and amenities of others and may substantially benefit or enrich the grantee of permission, compliance with the prescribed procedures should be treated as a condition precedent to the issue of permission. In such circumstances what the legislation has, either immediately in the Act or immediately in the Regulations nominated as being obligatory may not be depreciated to the level of a mere direction by the application of the *de minimis* rule. In other words what the legislation has prescribed or allowed to be prescribed in such circumstances, should be treated by the courts as nothing short of necessary and any deviation from such requirement before it is overlooked be shown by the parties seeking to have it excused to be so trivial or so technical, or so peripheral or otherwise so insubstantial that on the principle it is the spirit rather than the letter of the laws that matters, the prescribed obligation has been substantially and therefore adequately complied with.

I should also note the case of *Marshall v Arklow TC [2004] 4 IR* where the judge said it was an implied obligation of the planning authority to inspect site notices at least once and arguably on a more frequent basis.

As noted already, at the time this application was made there was a failure both to erect the required site notices and to include all the documents in the file available for inspection. These have led to a situation where NTA was compelled to spend almost €90,000 of taxpayer money (Dail question 246 reference 48046/23 to Minister for Transport) to place advertisements in a variety of newspapers . It would be my position that that fact alone leads to the inference that they are

material errors. However I believe it was an error not to treat the initial application as invalid. The highest level of public awareness would have been at that time.

Further it has never been made clear where the two omitted notices were. I am asking whether the Bórd made any inspection as seemingly required by Marshall. No explanation has been given as to this serious omission and why it happened – the email to parties of 14 September gives no detail. It was “rectified” on 18 August a number of weeks after the application was made. There is no explanation as to how it came to light. People were not told for almost a month. I believe the failure to erect those notices at the start of the process is a serious omission and in the light of the various judicial utterances, is such as to render the application invalid.

It is also of note here that no check seems to have been made in or around 18 August 2023 as to whether the display documents were compliant, even though this had been an issue in other applications. Two errors in the one process seems to me to compound the issue of invalidity.

I believe the Bórd also needs to consider whether the site notice is adequate to describe the development. It does not mention anything about the nature of the works off the corridor, nor does it mention the word bus gate, despite this being a feature in four places. I noted the ESB to Gormley case above, because it seems to involve a structure between two points where the application was held to be invalid.

There appears to be no case law as such on the issue of whether the application should identify the works for which permission is to be sought. I have read the application at length and quite frankly I am none the wiser as to what they want permission to do. Even on a simple matter of “Reconfiguration of existing bus stops resulting in 23 number new bus stop facilities” to quote the site notice, there is no clear statement in a page or two as to what is proposed. The location of bus stops is very important to bus users and a lack of clarity as to what is proposed, even in the application, seems to fly in the face of what Griffin J said in *Alf A Bet*.

I should also note the case of *Mulhare v the Bord* [2007] IEHC 478 cited in Simons paragraph 3.14 where it seemed to be suggested that if a large number of objections were made to the development proposal notwithstanding the alleged deficiency in the public notices, that might suggest the notice was adequate. I would argue based on this principle that the absence of many observations from areas clearly affected by the proposal would infer that the notice is not adequate. I have flagged areas which to me are likely to be adversely affected by this application and I would be very surprised if many people make observations. This of course is a damning indictment of the consultation process.

Appendix 4 diversion of traffic

The Kimmage corridor proposes to block off Lower Kimmage Road at Ravensdale Park. BusConnects own traffic counts at sample 11-4 suggests 13,000 inbound vehicles at Hazelbrook just before the critical junction, of which 3,500 currently divert into Ravensdale Park. This will substantially increase. Further a possible escape into Poddle Park is being blocked, so the traffic will have to use either Captain's Road or Cashel Road with numerous residential options thereafter. A similar issue will occur with outbound traffic. Pretty well every through residential road between Lower Kimmage Road and Crumlin Road (the "Lower Kimmage/Crumlin estates") is implicated.

As you are aware, there are other bus gates proposed on other corridors, most notably an inbound bus gate on Templeogue Road affecting 7,000 vehicles as per traffic count 10-10 at Fortfield Road at which point Templeogue Road becomes a "giant cul de sac". A combination of traffic diverted by this and traffic seeking to avoid the Ravensdale issue will increase traffic in Wainsfort, Fortfield, Greenlea and Lavarna residential areas.

The Templeogue Road block is also likely to divert extra traffic into Wellington Lane and all the roads leading from that which ultimately funnel into the Lower Kimmage/Crumlin estates.

The likely exit for a lot of this diverted traffic is either the over crowded junction at the Terenure Place end of Terenure Road West or more likely Clogher Road which of course is obstructed by a bus gate (hidden in this consultation). Clogher Road as per junction count 11-17 already has 6,000 cars each way, but this could double. It is a residential road.

In substance there are 13,000 cars inbound at Ravensdale, 7,000 inbound at Templeogue Road which will need to either disappear or reroute elsewhere. This will be likely via residential roads.

It seems to be the plan of NTA that all traffic from much of the south city will use Terenure Road North and Harold's Cross Road. This road will likely become severely overcongested and will not be able to cope with the volume of traffic. The silly idea of no right turn lanes at Emmet Bridge and South Circular Road will cause tailbacks.

NTA have been wholly un-cooperative in producing traffic flows despite repeated requests. Their models are suspect. For example Downpatrick Road was projected to have a massive increase in traffic in draft projections; this disappeared in the final models, my theory is because it was a grotesque outcome which NTA wanted to "magic away".

I believe the following local roads will be subjected to very significant additional traffic if Kimmage corridor is allowed. No plans are proposed by NTA to deal with this. Such is the level of blockage of local roads, that this will likely include HGVs

In Terenure (to re-divert to Terenure village)

College Park and Drive

Fortfield Road (with three adjacent schools)

Greenlea Road

Terenure Road West

Wainsfort Park

Wainsfort Road

In Kimmage (to avoid the southern bus gate)

Captains Road

Cashel Road

Clogher Road

Ferns Road

Lorcan O'Toole Park

Ravensdale Park

Stannaway Road

Sundrive Road

In Perrystown (to avoid the bus corridor altogether by keeping west)

Rockfield Avenue and Drive

Wellington Lane

Whitehall Road

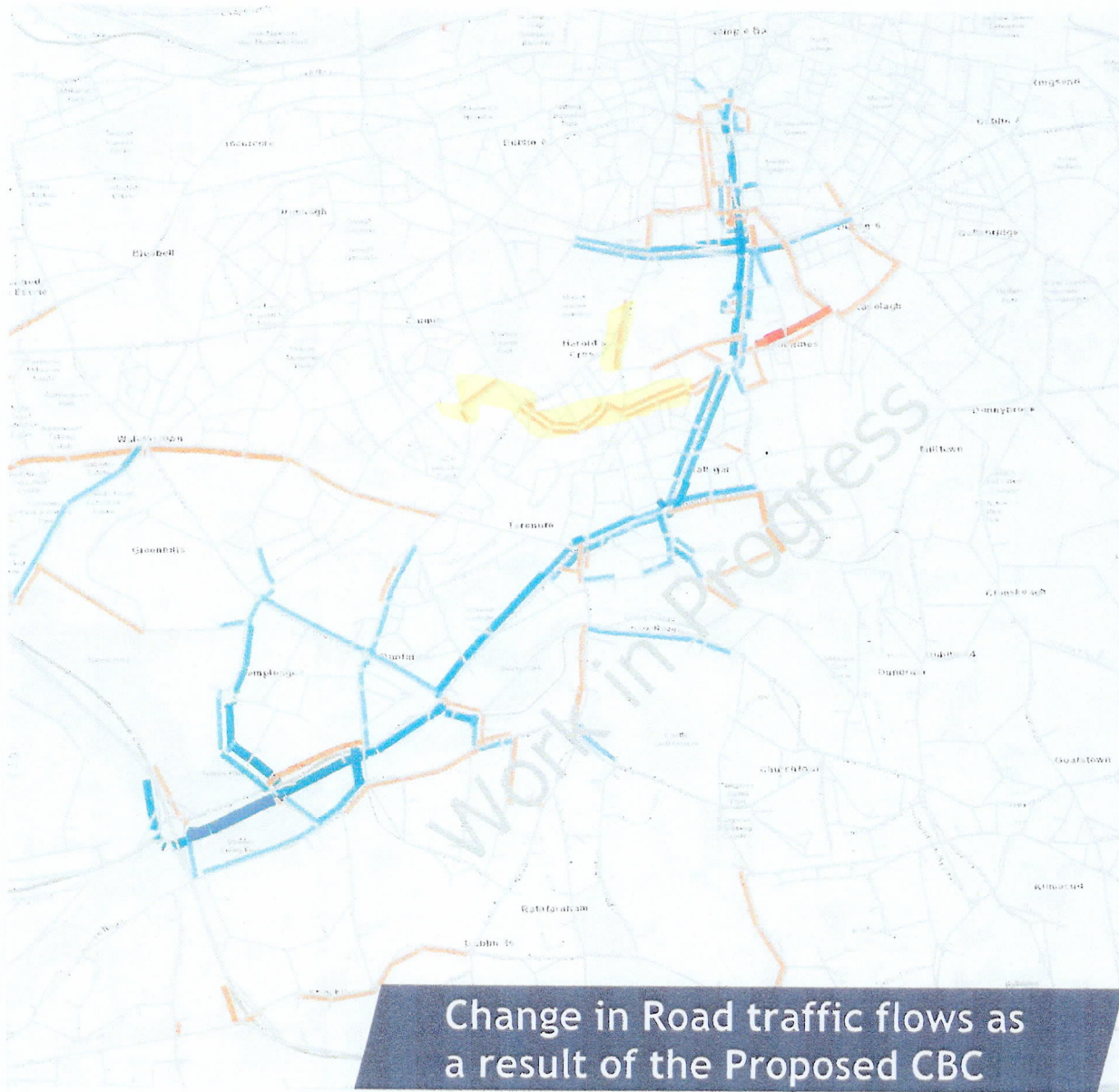
Whitehall Road West

I note a LOKRA submission to the Bórd in 2019 also identifies a lot of roads between Lower Kimmage Road and Harold's Cross Road as vulnerable to extra traffic. NTA should supply this document to you.

I believe the traffic modelling suggesting that these roads will not be very badly affected is wholly inadequate and inaccurate. NTA has not engaged in any meaningful way with residents to deal with their concerns. Please note Appendix 3 to my Templeogue Rathfarnham submission on traffic modelling.

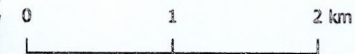
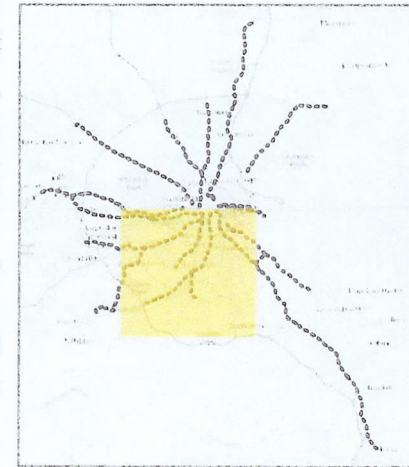
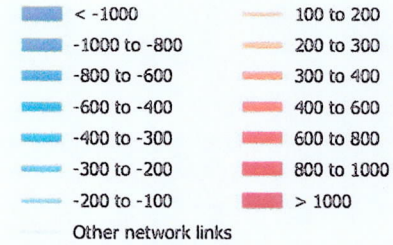
In a planning application some years back on the College Green Plaza the Bord rightly turned down a plan to close College Green on account of an inadequate assessment of where diverted traffic would go. The Kimmage corridor seems very much the same. It is proposed to close off Lower Kimmage Road without any plan as to where the traffic will go. I submit you should reject it in the absence of proper projections and plans for displaced traffic.

RATHFARNHAM



**Proposed CBC –
Estimated change in
road traffic with CBC in
place (AM Peak 2028)**

Flow Difference



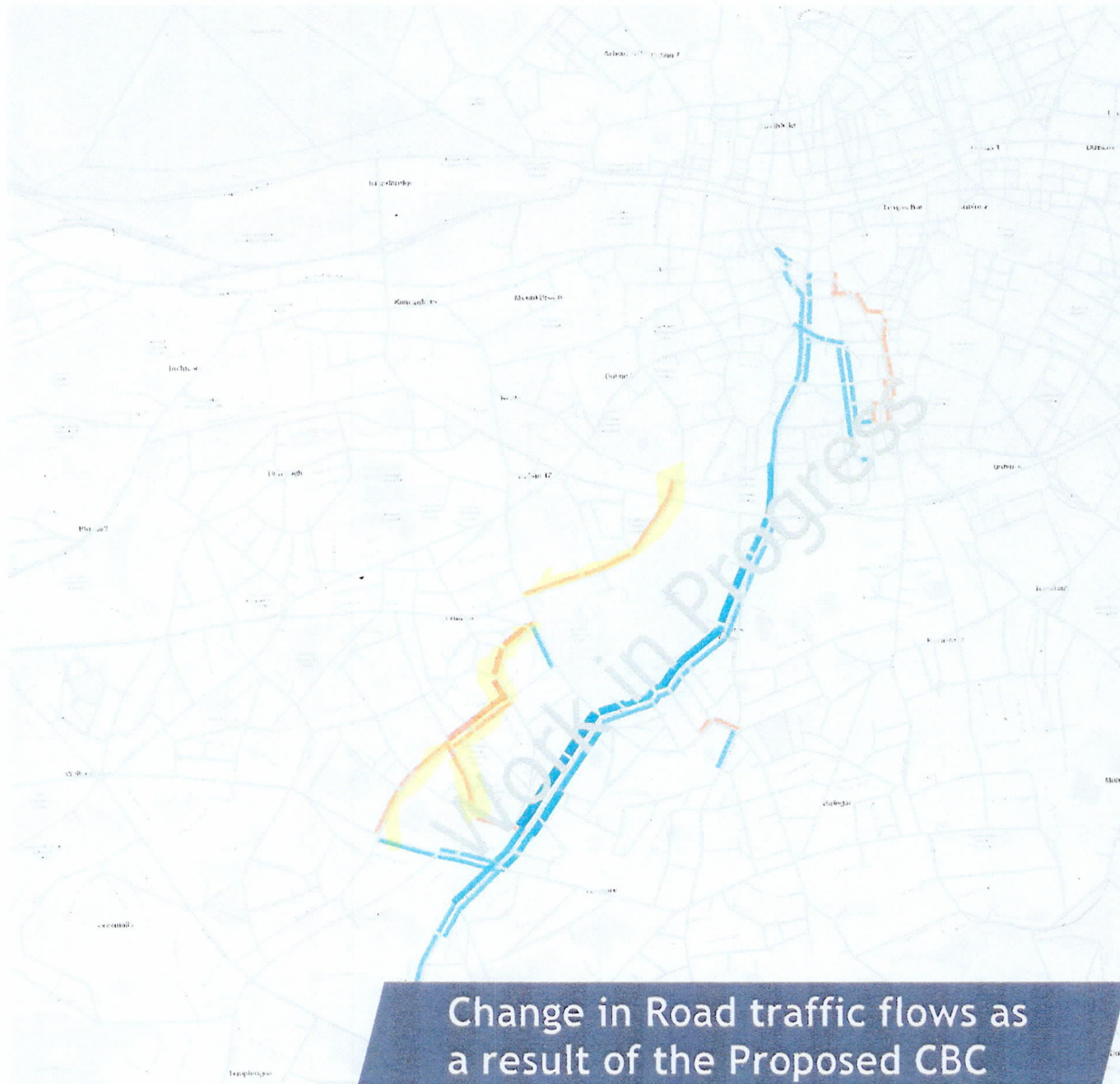
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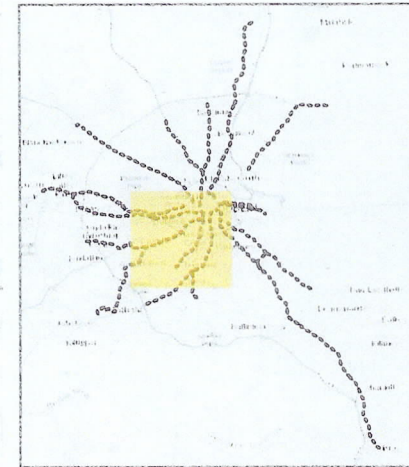


Change in Road traffic flows as a result of the Proposed CBC

Proposed CBC – Estimated change in road traffic with CBC in place (AM Peak 2028)

Flow Difference

	< -1000		100 to 200
	-1000 to -800		200 to 300
	-800 to -600		300 to 400
	-600 to -400		400 to 600
	-400 to -300		600 to 800
	-300 to -200		800 to 1000
	-200 to -100		> 1000
	Other network links		



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Appendix 5 the cordoned area

A very irregularly shaped area but bounded roughly by
Kimmage Road West/Terenure Road West to the south
Terenure Road North/Harold's Cross Road to the east
Grand Canal to the north
Clogher Road, Sundrive Road and Stannaway Road to the west

are in a "cordon". These have a population of 13,668 per the 2022 census. Electoral divisions of Kimmage C 3,540. Kimmage D 2,439 Terenure A 3,945 Terenure B 3,744 .

If anyone wants to exit or enter this area the north exit at Harold's Cross Park and the south exit at Ravensdale is barred by bus gates. Therefore exit /entrance is east via Kenilworth junction or west via Sundrive Road. This is a far worse issue for persons living in the area.

The east exit is very compromised as it involves the five way Kenilworth junction, with a very awkward right turn from the city. In fact I am sceptical there is enough room for the proposed right turn lane here. It is inappropriately dealt with in a different planning application. Further there is an unsatisfactory junction at Kenilworth Park where a busy road (with the S2 and proposed 82 bus services) gives way to a subsidiary road. Further other plans seem to imply a lot of extra traffic in Harold's Cross Road see Appendix 4 .

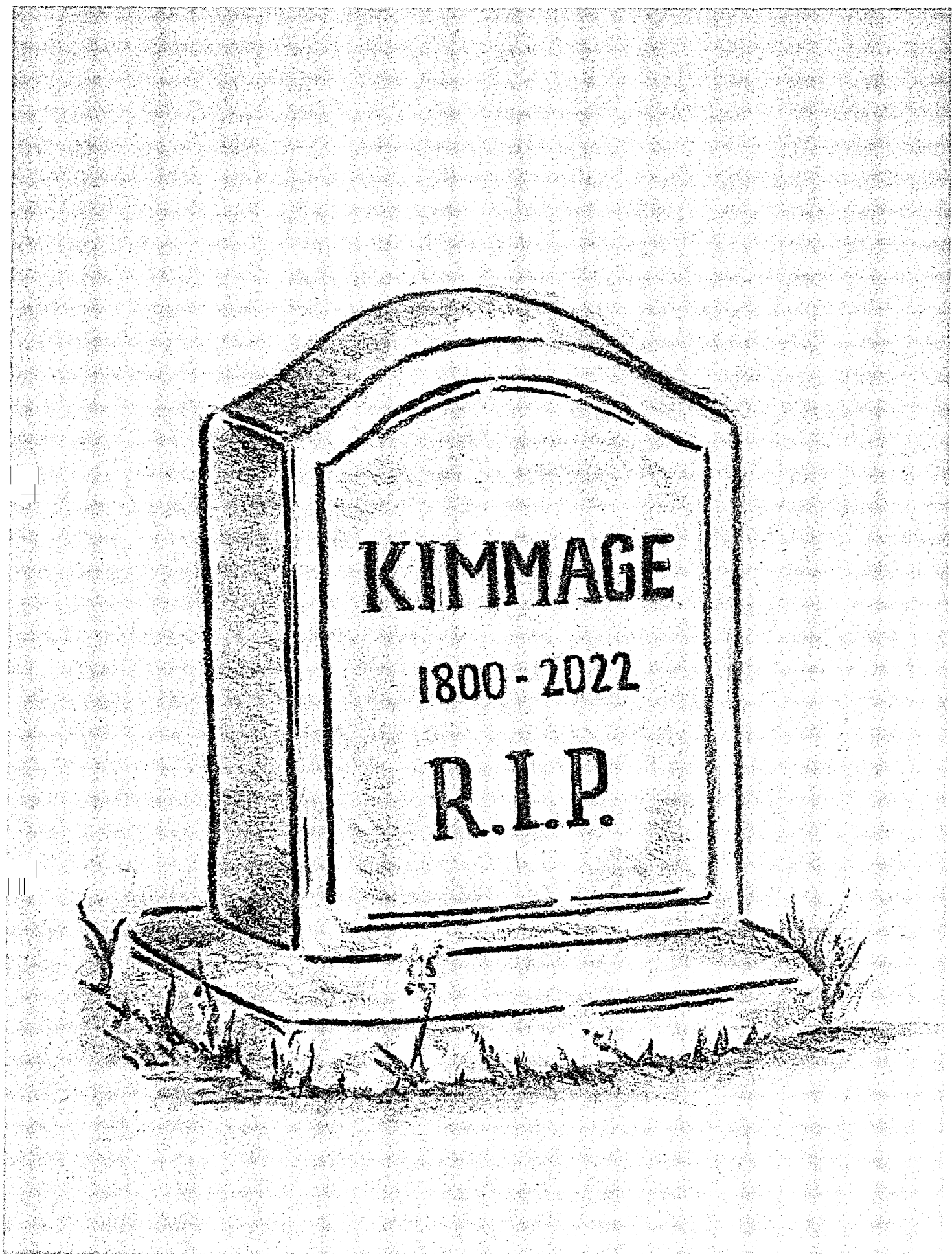
In my view the only realistic exit is west, which will tempt the use of either Stannaway for south bound journeys or Clogher for north bound.

I am pretty certain that very few of these people have been consulted about this cordon arrangement. Indeed many of them are likely not computer literate and were therefore arbitrarily excluded.

Appendix 6 Kimmage village

The current city development plan identifies Kimmage village as an important third order shopping area. There are about 70 businesses there (Appendix A10.1) items 3 to 33 and items 36 to 76 including my own local branch of Supervalu. Because of the cordon described in Appendix 5, those customers who have to travel by car from outside the area will have diminished access. It is likely that a lot of those customers will be deterred. I believe many of the businesses will be able to demonstrate that the logical effect of this cordon is to imperil their finances and even to close them down.

It should be noted in particular that there is a string of car related businesses in a stretch of Lower Kimmage Road to become a virtual cul de sac, including the petrol garage business no 16 , I regularly use. These businesses can hardly be viable if this plan is implemented. The destruction of businesses is contrary to the City Development Plan and is bad planning practice.



Appendix 7 Local detours

I would submit that the level of local detours required by car users to reach destinations now reached via Lower Kimmage Road will result in a massive increase of emissions from vehicles and will be environmentally damaging. Extra cars on residential roads increase pedestrian and cyclist safety risks. They increase noise in those roads.

I have little doubt that some observations will cite detours that people will be forced to make day in day out to facilitate this corridor. A few examples

A Derravarragh Road in Terenure is to be cut in three, which seems preposterous. If a car dependent person wants to drive from the northern end of the road to the southern end, they will need to take Neagh Road, Melvin Road, Mount Tallant Avenue, Terenure Road North, Terenure Road West and Hazelbrook Road to get there

B A resident of Hazelbrook Road adjacent to KCR will need to drive Ravensdale ^{Park} Road, Cashel Road, Stannaway Road and Sundrive Road to get to their local supermarket at Sundrive Road

C a resident of Sundrive Park, close to Sundrive Cross will need to drive Sundrive Road, Stannaway Road, Lorcan O'Toole Park and Kimmage Road West to get to KCR.

I believe these detours add about 2km to a journey and if one has to make it twice daily, that is 4km. I believe that the Bord should seek to measure typical extra journeys and this should have been done in the application.

The NTA seem to assume that all car users are very bad. They ignore the fact that many older people are car dependent, that it is impossible to get to three schools simultaneously by using bus and that it is impossible to do a weekly family shop and use a bus.



Brendan Heneghan <brendanheneghan@gmail.com>

Personal effect of bus schemes

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Mon, Dec 4, 2023 at 2:02 PM

The personal effect of bus schemes in Terenure (and Kimmage and Templeogue/Rathfarnham are inextricably linked) is to cut me and my community off from easy access to all local supermarket shopping facilities

I am cut off from Supervalu in Kimmage and Tesco Express on Lower Kimmage Road by the Ravensdale bus gate unless I go in after 10 and get back through the gate by 4. If I go there at 3.30 there is the worry of getting out by 4. You can't even go Saturday or Sunday.

I am impeded in access to Tesco Rathfarnham by the unnecessary removal of a left slip at Springfield and by a proposed right turn ban into my estate

I am impeded from accessing Aldi and Lidl in Terenure, as inevitably Terenure Road West will be much more congested traffic diverting to avoid the Ravensdale gate.

The only option left is Supervalu Knocklyon or Dunnes Ashleaf, both much further away. So much for the 15 minute city.

It is difficult to assess how much heavier traffic will be on roads leading to all of these, adding to the problems. If there are new traffic counts, I believe I should be allowed refer to them as part of the process around this application, as they are central to all of this. They could easily have been done before the application went in and NTA should not be allowed avoid scrutiny of them by the device of doing them post application..

Appendix 8 Time taken by buses

I would contend based on my own extensive observations of the “reference bus” the current 54A that the time savings claimed by BusConnects as achievable from what currently happens are not correct and I suspect are based on pre 2020 information, so hopelessly out of date.

It is also the case that people in my area use the 54A, the only bus using the entire length of the proposed corridor, because it is quick. It is not however reliable as often a half hour service is missed. By contrast other buses in the area are more reliable but their journey time is unpredictable (I have a number of Rathmines Road observations on this issue and a page from 2 Oct to 22 Oct 2019 is attached, showing wide variation). The issue with the 54A is “will it turn up, not how long it will take”.

Reasons for any time deviations

I believe I know far more about the 54A than the people who wrote the planning application document. I use it frequently and I have since this process kicked off been timing it through the corridor. The reasons for variations in the 54A time are by my observation principally the following

A more than the usual number of 54A boarding passengers all having to visit the ticket machine; this usually arises because the last number 9 was a good while back and no 9 passengers take the 54A.

B the introduction some years back of a full pedestrian traffic light phase at Sundrive Cross which means that nothing moves for 40 seconds. This delays traffic at Sundrive Cross.

C traffic turning right outbound (and to a lesser extent inbound) at Sundrive Cross. If two cars want to do this, nothing gets through; this could easily be banned

D the very narrow road infrastructure inbound at South Circular Road. The provision of a cycle lane a few years back at this junction so narrowed the two inbound traffic lanes that two large vehicles cannot easily pass

E drivers driving in or parked in the bus lane

I am absolutely certain that these factors account for about 80% of the variances in journey times.

It is also clearly the case that a lot of time is wasted by the process where everyone has to either visit the driver or a machine directly inside the door to pay a fare. I have been in a lot of cities (for example Freiburg, Berlin, Brussels, Basel, Ghent) recently and the practice of having the machine in a place that it blocks the entrance is unique to Dublin. Surely as in other cities, people can prepay their fare at a machine at busy bus stops and there is no need to delay operations by this revenue obsessed layout at the door of the bus. While I accept that the overall time consumed by this is not significant, it is equal to or greater than a lot of the miniscule time savings to be achieved by a number of the plans, including the Kimmage one.

It is my submission based on lots of observation that most 54A journeys take in or around 15 minutes to run through the corridor , plus or minus about three minutes. This of course is the figure claimed in the brochure as the running time that will be achieved by BusConnects. I challenge any

suggestion that a time saving of 7 or 5 minutes is achievable. Detailed notes are attached with times highlighted.

A very interesting document prepared by LOKRA was given to me under Freedom of Information. This is based on running times for an awful lot of 54As in Spring 2019. It confirms the pattern that the vast majority of journeys are under 20 minutes and ergo in my view that minimal traffic solutions are needed.

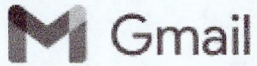
It is also the case based on my observations that the time spent on that part of the journey from the city centre as far as New Street is substantial when compared with the corridor journey

The time savings claimed in chapter 6 are not impressive 7.4 minutes inbound and 5.4 minutes outbound in 2028 and reducing to about 2 minutes by 2043 pages 79 and 83 of Traffic and Transport Chapter 6. The 2043 projection is among the least impressive across all corridors and only Tallaght Terenure, Lucan, Clondalkin Drimnagh and Finglas corridors achieve a less saving. It is very difficult to reconcile the serious inconvenience and environmental damage with these minimal savings.

On a recent journey a 54A scheduled to leave the city on the half hour left at 25 to the hour. The bus was parked at the terminus at the scheduled time. I got home 25 minutes after the scheduled time of departure. Quite frankly the time taken was of no consequence, except to show that if NTA got the driver to move off on schedule , I would have saved five minutes.

A misleading claim has been made in the public document that the current bus journey time is up to 45 minutes. It is then implied that a saving of 30 minutes is routine. The 45 minute claim (which is 11,25 minutes per km; very high per km when compared with other corridors) is I submit blatantly exaggerated, absent something completely blocking the road. In November 2020 I walked the corridor on 12th and 23rd and recorded a walk time of 43.26 minutes and 40.48 minutes respectively.

Statistics produced by NTA themselves (and acquired under FOI in February 2021) based on many journeys on the corridor (no time specified) show that most inbound journeys take 20 minutes or less and the only ones seriously out of line are between 7.30am and 9am in the morning inbound. The claim is particularly "off the wall" outbound as their statistics show 2 buses (of many) which took 28 minutes, the maximum time recorded. It is seriously doubtful that any outbound bus gate is merited.



Brendan Heneghan <brendanheneghan@gmail.com>

54A through corridor 17.53 mins

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Sat, Dec 2, 2023 at 1:31 PM

Slow into corridor.at KCR
Slight delay at Sundrive parked cars an issue, possibly illegal with cycle lane
Lots of passengers getting on. No 9 six minutes behind.
Saturday lunchtime 13.05 service.
No substantial delays . Cold dry day.

Sent from my iPhone

12/3/23, 10:51 PM

Gmail - 54a through corridor 16.24 minutes



Brendan Heneghan <brendanheneghan@gmail.com>

54a through corridor 16.24 minutes

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Thu, Nov 30, 2023 at 2:41 PM

Inbound. Arrived 14.23 dampish day . Very cold heavy showers. Inbound to city. Only issue car turning right at Sundrive.

Brendan

Sent from my iPhone

11/28/23, 10:44 PM

Gmail - 54A through corridor. 12.38



Brendan Heneghan <brendanheneghan@gmail.com>

54A through corridor. 12.38

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Tue, Nov 28, 2023 at 10:19 AM

Inbound entered 10.05. Dull but dry morning. No 9 directly in front initially. Bus jumping thereafter. Very few passengers getting on.
(RTPI at Mount Argus Comm Centre not working nor at Hospice)
Usual slight delay at SCR as two buses ahead and lanes not wide enough.
12.37 through corridor arrive 10.18.

Sent from my iPhone



Brendan Heneghan <brendanheneghan@gmail.com>

54A

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: Brendan Heneghan <brendanheneghan@icloud.com>

Tue, Oct 3, 2023 at 1:33 PM

Start of outbound journey 13.35. Fine day. Bus was 5 minutes late leaving terminal even though driver there at scheduled time.
Enter corridor 10.17 minutes
Slow through SCR as bicycle lane an issue
25.21 to end of corridor hence
15.04 minutes throughn corridor
Difficult to see how this is not a realistic baseline given benign conditions.

Brendan

Sent from my iPhone



Brendan Heneghan <brendanheneghan@gmail.com>

54A outbound

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Fri, Sep 29, 2023 at 4:33 PM

Bright Friday evening 5pm. Left terminus 17.00. 15.34 to start of corridor.

49 bus in front knocking over bicycle stakes in two lane Clanbrassil St.

Only delay two cycles through Sundrive cross - right turning traffic

31.37 mins to end corridor so 16.03 about the same as city centre leg

Sent from my iPhone



Brendan Heneghan <brendanheneghan@gmail.com>

54a

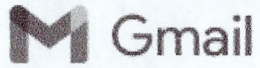
1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Fri, Sep 22, 2023 at 5:55 PM

Started journey 18.36 very slow at SCR built back to canal. Bright evening.

Took 18.42 minutes through corridor.
Sent from my iPhone



Brendan Heneghan <brendanpheneghan@gmail.com>

54a Sat 16 Sept 4.30pm

1 message

Brendan Heneghan <brendanpheneghan@gmail.com>
To: Brendan Heneghan <brendanpheneghan@gmail.com>

Sat, Sep 16, 2023 at 3:57 PM

Wet drizzly day. Had rained all day. Bus likely ahead of 9 (3 mins after) so a lot of passengers getting on. Most significant delay SCR. Narrow lanes issue.

16.46 through corridor.

Sent from my iPhone



Brendan Heneghan <brendanpheneghan@gmail.com>

54A

1 message

Brendan Heneghan <brendanpheneghan@gmail.com>
To: Brendan Heneghan <brendanpheneghan@gmail.com>

Fri, Aug 11, 2023 at 4:00 PM

11 Aug 4.30pm
Fine day dry
12.10 to start of corridor.
Tailback at Sundrive to Mount Argus Grove. Right turning traffic issue
28.54 to end of corridor hence 16.44 mins

Brendan
Sent from my iPhone



Brendan Heneghan <brendanpheneghan@gmail.com>

54a through corridor 26/7/23

1 message

Brendan Heneghan <brendanpheneghan@gmail.com>
To: Brendan Heneghan <brendanpheneghan@gmail.com>

Wed, Jul 26, 2023 at 8:25 AM

Overcast and slight drizzle. Got quite wet during journey. Delay at Leonard's Corner
16.40 minutes through corridor. Traffic busy Patrick St. 9.25am

Sent from my iPhone



Brendan Heneghan <brendanheneghan@gmail.com>

54A outbound

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: Brendan Heneghan <brendanheneghan@gmail.com>

Mon, May 29, 2023 at 2:57 PM

Very sunny day 3.30pm

Very slow at Christchurch - 3 horse drawn vehicles ahead
Slight delay at SCR
13.58 mins through corridor

Sent from my iPhone



Brendan Heneghan <brendanpheneghan@gmail.com>

54A time through corridor

1 message

Brendan Heneghan <brendanpheneghan@gmail.com>
To: Brendan Heneghan <brendanpheneghan@gmail.com>

Mon, May 29, 2023 at 1:50 PM

Bus at 2.30 pm
Sunny day
Time through corridor 16.19

Sent from my iPhone



Brendan Heneghan <brendanheneghan@gmail.com>

54A through the corridor 18.09

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
To: **Brendan Heneghan** <brendanheneghan@gmail.com>

Thu, May 25, 2023 at 5:26 PM

Slight tail back at Sundrive to Kenny Whelan no tailback out.
No tailback at Canal
Bit slow at Leonard's Corner. Bike lane problem. Bus about half metre in outside lane. Short sequencing.
Total 15.08 through corridor 18.24
Ok thereafter

Sent from my iPhone



Brendan Heneghan <brendanpheneghan@gmail.com>

54A time 29/3/23

1 message

Brendan Heneghan <brendanpheneghan@gmail.com>
To: Brendan Heneghan <brendanpheneghan@gmail.com>

Wed, Mar 29, 2023 at 11:21 AM

12.50 minutes through corridor. 12.05 service ex Fortfield. Wettish day. Delays caused by people getting on bus and tail back at Kevin st due to Coombe traffic light.

Sent from my iPhone



Brendan Heneghan <brendanpheneghan@gmail.com>

Bus time 54A

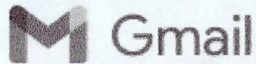
1 message

Brendan Heneghan <brendanpheneghan@gmail.com>
To: Brendan Heneghan <brendanpheneghan@gmail.com>

Tue, Feb 14, 2023 at 9:01 AM

Morning of 14 Feb 2023. Fine morning. Mid term
3.46 minutes from Fortfield to KCR. No right turning cars.
8.54 KCR to Sundrive. Missed opportunity by picking up passengers at Community Centre.
18.50 minutes through corridor. At 9.00am.
No traffic issues after Sundrive.

Sent from my iPhone



Brendan Heneghan <brendanheneghan@gmail.com>

journey times 54A

1 message

Brendan Heneghan <brendanheneghan@gmail.com>
 To: Brendan Heneghan <brendanheneghan@gmail.com>

Tue, Nov 21, 2023 at 4:49 PM

This is a transcript of various "notes" made by me on my mobile phone related to the journey times of the 54A bus from KCR to St Patrick's Cathedral. This is the extent of the Kimmage bus corridor.

Unless it is clear from the context, all figures relate to time taken through the corridor. All were measured by the Stopwatch feature on iPhone.

O = outbound journey

5/1/23 Thurs

54A 11.03am fine day 09.53 through corridor

54A outbound 5/1/23 15.47 minutes drizzly [same day 3.15pm drizzly] at 15.42

24/10/22 Mon

17.09 54A inbound 16.51 minutes through QBC. Sunny and dry day. Very slow from then on to Central Bank

14/10/22 Fri

O 17.41 54A outbound, 4.30pm service sunny day Delay at Sundrive

23/11/20 Mon

40.48 mins Kimmage corridor 23/11 started at Hazelbrook but clicked start before junction

20/2/20 Thurs

54A 16.45 20/2 bright and clod day 19.27 minutes through corridor

12/2/20 Wed

16.47 12/2 bright and cold day. 20.53 minutes through corridor. Tailback at Clanbrassil.

15/10/19 Tues

O 54A to Terenure 16.30 15/10 sunny day and dry. Enter corridor F 16.42 16.14 minutes to KCR. Tailback at KCR

10/19 Wed

O 54A to Terenure 15.34 23/10 cloudy and dry 12.14 minutes to run F spine. Arrived 15.54

25/10/19 Fri

54A to Harold's Cross 3.01pm 25/10 11 mins to Greenmount wet day

26/10/19 Sat

54A to Edward St 26/10 bus gate 17.03 15.09 mins to exit bus corridor ie 17.19 fine day

9/11/19 Sat

54A to town 17.10 9/11 very slow at SCR. No scope for bus lane to resolve. 19.57 minutes. Cold, dry and dark

23/11/19 Sat

54A to town 16.58 23/11 13.58 minutes. Don't think faster is possible. Delay at Leonard's X.

27/4/19 Sat

13.26 mins corridor 7pm service. Saturday

8/4/19 Mon

O Monday 3.30 wet outbound. Only started time at Leonard's Corner 9.43 mins

13/3/19 Wed

8.35am. Over 4 mins to get to KCR. 16.41 mins on corridor. Mainly held up in upper KCR. Sunny morning. Lots of bikes in lane at Hospice.

5/3/19 Tues

O 16.10 service tailback to Priory, tailback to Circle K which is much longer 19.06 mins

5/3/19 Tues

12 mins incl 2.40 mins at stops with people getting on

2/3/19 Sat

9.55 mins

16/2/19 Sat

O Almost 9 mins 8.58 to be precise Patricks to KCR. This was the 11.30 service on 16 Feb

S4 A 1 N

30 Min Time Band	Average Planned Running Time (min)	Average Actual Running Time (min)	25 Percentile	75 Percentile	95 Percentile	StdDev	Number of Detected Trips	Detected Trips (% of Planned)
07:00	20	22	9	35	45	11.51	22	100.00%
07:30	26	30	6	54	70	20.62	20	90.91%
08:00	26	26	2	50	67	20.93	21	95.45%
08:30	21	24	7	41	53	14.72	22	100.00%
09:00	21	22	4	39	51	14.99	21	95.45%
09:30	15	17	11	22	26	4.54	20	90.91%
10:00	15	15	12	17	19	2.48	21	95.45%
10:30	13	13	11	15	16	1.63	18	81.82%
11:00	13	15	13	17	18	1.78	20	90.91%
11:30	13	13	10	15	17	2.24	20	90.91%
12:00	13	14	11	16	17	2.00	21	95.45%
12:30	14	13	11	16	18	2.17	20	90.91%
13:00	14	13	11	16	17	2.09	21	95.45%
13:30	14	15	12	18	20	2.60	22	100.00%
14:00	14	14	12	16	18	1.83	21	95.45%
14:30	14	14	11	16	18	1.99	22	100.00%
15:00	14	14	10	19	22	3.96	21	95.45%
15:30	16	15	12	18	21	2.80	22	100.00%
16:00	16	15	11	19	21	3.39	19	86.36%
16:30	16	18	8	28	36	8.88	20	90.91%
17:00	16	20	10	30	37	8.75	20	90.91%
17:30	17	18	10	26	32	7.07	19	86.36%
18:00	17	16	10	22	26	5.10	20	90.91%
18:30	15	16	10	22	26	5.24	19	86.36%
19:00	15	17	10	23	28	5.76	15	68.18%
19:30	12	16	10	21	25	5.04	19	86.36%
20:00	12	11	8	15	17	2.88	20	90.91%
21:30	8	10	8	11	12	1.37	21	95.45%
22:30	8	8	7	10	10	1.03	22	100.00%
23:30	8	7	5	8	9	1.25	21	95.45%

Not physically possible data, make a

S4 A OUT

30 Min Time Band	Average Planned Running Time (min)	Average Actual Running Time (min)	25 Percentile	75 Percentile	95 Percentile	StdDev	Number of Detected Trips	Detected Trips (% of Planned)
06:30	12	12	11	14	15	1.13	21	95.45%
07:00	18	18	15	21	24	2.84	21	95.45%
08:00	20	20	15	26	30	4.73	21	95.45%
08:30	20	19	14	23	27	3.91	18	81.82%
09:00	14	15	12	17	18	1.92	15	68.18%
09:30	14	14	11	16	18	2.24	17	77.27%
10:00	12	12	10	14	15	1.46	20	90.91%
10:30	12	14	12	16	17	1.78	18	81.82%
11:00	12	14	11	16	17	1.96	19	86.36%
11:30	12	14	11	17	19	2.62	21	95.45%
12:00	15	14	13	15	16	1.18	21	95.45%
12:30	15	16	13	19	21	2.37	21	95.45%
13:00	15	16	14	18	20	2.09	22	100.00%
13:30	15	16	14	18	20	1.94	21	95.45%
14:00	15	17	15	19	20	1.59	21	95.45%
14:30	15	19	14	24	27	4.11	22	100.00%
15:00	18	16	13	20	22	3.11	21	95.45%
15:30	18	18	15	22	24	2.75	22	100.00%
16:00	18	20	18	23	25	2.20	22	100.00%
16:30	18	21	17	24	27	3.14	22	100.00%
17:00	22	21	18	24	26	2.76	21	95.45%
17:30	22	22	19	25	27	2.45	17	77.27%
18:00	21	21	18	24	26	2.40	20	90.91%
18:30	21	18	15	20	22	2.22	18	81.82%
19:00	16	16	14	18	20	1.75	18	81.82%
19:30	16	17	10	24	28	5.83	20	90.91%
20:00	16	16	9	23	28	6.14	21	95.45%
21:00	11	13	11	15	16	1.66	20	90.91%
22:00	11	13	9	16	19	2.97	21	95.45%
23:30	11	10	9	11	12	0.95	22	100.00%

MINS

DATE OF JOURNEY	DEPARTURE TIME	DEPARTURE STOP	ARRIVAL STOP	ARRIVAL TIME	AM / PM	BUS	
02-Oct	19:36	1283	1088	20:08	PM	15a	32
04-Oct	09:40	1119	7578	10:05	AM	15a	25
07-Oct	08:35	1120	1072	8:53	AM	15a	18
08-Oct	9:11	1163	1072	9:35	AM	15	24
09-Oct	08:23	1120	1072	08:49	AM	15A	26
09-Oct	18:30	1283	1088	18:56	PM	15A	26
10-Oct	08:48	1118	1072	09:08	AM	15A	20
10-Oct	19:20	1076	1121	19:36	PM	15	16
11-Oct	08:47	1119	7578	09:25	AM	15A	38
15-Oct	09:02	1119	1072	09:22	AM	15A	20
16-Oct	08:38	1120	1072	08:59	AM	15A	21
16-Oct	19:12	1020	1088	19:32	PM	15A	20
17-Oct	08:52	1118	1072	09:12	AM	15A	20
17-Oct	18:20	7581	1088	18:43	PM	15A	23
18-Oct	18:39	1283	1088	19:10	PM	15A	31
21-Oct	08:37	1119	1072	09:05	AM	15A	28
21-Oct	19:00	1283	1088	19:24	PM	15A	26
22-Oct	08:59	1163	1072	09:18	AM	65	19

~~1283 Georges St~~
 1088 Parkman
 1119 Hazelbrook
 1120 Terrace Gardens
 1163 Terence Library
 1118 Hazelbrook
 1121 Templeogue Rd

1283 Georges St
 1076 Swan
 1020 Rathmines
 7581 Dane St
 1072 South Richmond
 7578 Fade St.

TIME TAKEN ON RATHMINES CORRIDOR

2019 letter

Bus Connects and the capital

gal Quinn was in-
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talion for 30 years.
o a good soldier. -
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Sir, - I refer to John Thomp-
son's letter of April 27th and his
belief that Bus Connects could
improve bus travel times from
Rathfarnham by an extraordi-
nary 50 minutes.

Sadly, this letter writer has
been taken in by the amazing
claims in the glossy Bus Con-
nects brochures. For numbers
closer to the truth, I recom-
mend he reads page 311 of the
NTA's own CBC Feasibility
Study and Options Report
which states that peak-time in-
bound journeys times for this
route are, at worst, 28 minutes.

As there are already signifi-
cant bus lanes on this route, and
the introduction of cashless
fares and priority signalling at
junctions could improve jour-
ney time by a further seven min-
utes.

If the magical Bus Connects
can improve Mr Thompson's
journey by 50 minutes, then,
alarmingly, he's very much at
risk of meeting himself going in
the other direction. - Yours,
etc,

LORNA CALLANAN,
Terenure,
Dublin 6W.

A night mayor on Main Street

A chara,- I read that Fine
Gael would like to establish

Why Frequency Comes First

Patronage responds to many features of a service, including speed and reliability, but the dominant factor is frequency. Frequency is the elapsed time between consecutive buses (or trains, or ferries) on a line, which determines the maximum waiting time.

People who are used to getting around by private vehicle often underestimate the importance of frequency, because there isn't an equivalent in their experience. A private vehicle is ready to go when you are, but public transport isn't available until it comes.

High frequency means public transport is coming soon, which means that it approximates the feeling of liberty you have with your private vehicle – namely that you can go anytime. Frequency has three independent benefits for the passenger:

- **Frequency reduces waiting**, which is everyone's least favorite part of a trip. The basic sensation of being able to go when you want to go is the essence of frequency. (A smartphone can tell you when the bus is coming, but still does not reduce the wait or get you where you want to be.)

- **Frequency makes connections easy**, which makes it possible for a cluster of public transport lines to become a network. A public transport line without good connections is useful for travelling only along that line. A network of frequent lines can make it easy to travel all over the city. This massively expands the usefulness of each line.
- **Frequency is a backup for problems of reliability**. If a vehicle breaks down or is late, frequency means another will be along soon.

We can see the effect of frequency by looking at how existing services perform.

Figure 13 shows a dot for each Dublin Bus line, with the x-axis indicating frequency and the y-axis indicating productivity, which is patronage divided by the quantity of service provided. High frequency means a low elapsed time between consecutive trips, so it is to the left on these diagrams. Quantity is measured in vehicle hours, where a vehicle hour is one bus operating for one

hour.

Adjacent Figure 14 shows a similar graphic for hundreds of lines in 24 North American cities. In both cases, **higher frequency is generally associated with higher productivity**.

The larger dataset shows the pattern very strongly, including the upward curve indicating an exponential payoff of very high frequencies.

The same effect is visible but less obvious in the Dublin data. This is probably because many infrequent lines tend to run long distances on the same streets, so that people can sometimes take whichever comes first. This effect causes higher frequency, and thus higher patronage, on lines that are technically infrequent.

These graphs are more remarkable than they first look, because higher frequency means a higher quantity of service. **This illustrates the power of frequency to deliver more patronage than would be expected by the increase in service hours.**

IMPORTANT OF FREQUENCY | RELIABILITY
 NO MENTION OF DURABILITY

Figure 13: Frequency vs. productivity (boardings per hour) on bus lines in Dublin

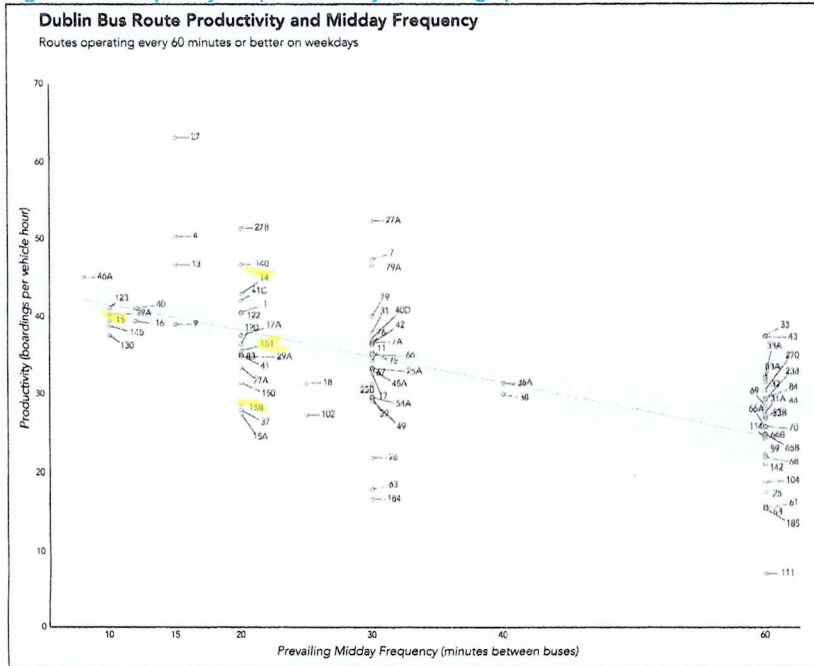
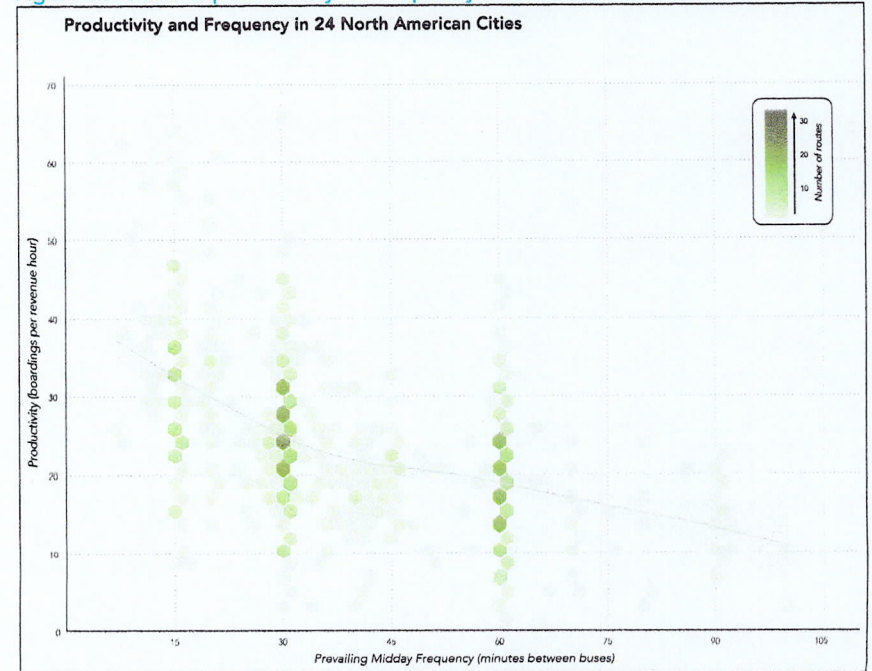


Figure 14: Chart of productivity vs. frequency in 24 North American cities



Appendix 9 Bus Routes of F buses outside corridor

I am certain that any time saving achieved by a corridor from KCR to St Patrick's Cathedral will be wholly lost by two other features

Delay in accessing the corridor at its southern entrance Kimmage Cross Roads

The very circuitous route proposed after St Patrick's Cathedral rather than following the simple 54A route as now.

Southern end

The three F services entering the corridor at KCR come respectively from Fortfield Road (the F1), which is one lane right up to the junction and from Kimmage Road West (the F2 and F3) which is constricted not far from the junction.

In the case of the F1, it seems virtually certain that this will be caught in tailbacks stretching far back up Fortfield Road. This can already create about a five minute delay. I would be pretty confident that this delay would be more than the time saving. For the F1 the cure is worse than the disease.

While this is less clear, the F2 and F3 will potentially be held up by extra traffic on Kimmage Road. This road is only wide up to its intersection with St Anne's Estate. It is also foreseeable that extra traffic on the narrow Whitehall Road will hold up the F2.

There is likely to be much greater traffic turning at the KCR junction and each bus route will be delayed entering the corridor. They may also be delayed by traffic diverting into and out of Ravensdale.

A lot of these potential problems are an indirect result of the silly proposal for a bus gate on Templeogue Road, where the existing priority light is clearly adequate. This bus gate would divert traffic to Fortfield Road and delay the F1

City Centre

It is evident from the Bus Network map entitled City Centre Area that all F buses, which are the rationale for the corridor, will follow a much longer city centre route. The obvious route (which I strongly prefer and I think should be stitched into any planning) is 1.1 km via Christchurch Place and Dame Street but for some unexplained reason this is to be abandoned. Instead the bus will take a 2.3km route via three sides of St Stephen's Green and Dawson Street. Further northbound and to a lesser extent southbound it will run on the Luas tracks, which can hardly be welcomed by the Luas operator. There is no bus lane proposed for this entire new route. No one asked for the change in the route and it should not be imposed on us.

I suspect the unexplained reason for the change is an unholy alliance between Dublin City Council who are desperate to get a Plaza at College Green and there is some hidden quid pro quo with the bus interests. Despite a lot of hot air, I don't think the fundamental reason the Plaza was turned down before by the Bórd ref 29S.JA0039, namely inadequate analysis of where displaced buses will

go and impact on the Quays, has gone away. I would indeed suggest that the bus corridors in Terenure are so linked to the Plaza that it is difficult to decide any of the issues, without all of them being taken together.

It is clear from my own experience of route running times that the city centre leg is typically 40% of a journey time, so additional city centre running is not to be welcomed. One of the many clear deficiencies in all of these planning applications is the failure to supply any information about routes or running times to join up northside and southside corridors. This is something that I believe the Bord ought to seek, given that the major rationale seems to be time saving.

There is a plan currently under consultation at City Council level on traffic management in the city core. It is quite extraordinary that even though this document seems to be driven by a concern about how buses get through the city centre, there is not even a map showing how the key A to H spine routes will navigate the centre. It would seem to me that an orderly process would have addressed this issue before planning applications for corridors and in particular planning applications affecting Terenure where the F routes are being diverted on a very circuitous route and no one knows where the A routes will end up.

I note that in the case of F routes, they will also be using a corridor on the north side that offers very minimal savings, in the form of the Finglas Road where average savings are at best 1 minute. I find it difficult to see how any savings can be achieved there as it is all substantially a bus lane already. Generally the F services will achieve little in their suburban sections either north or south side from bus lanes.

I would suggest that further information on this topic be sought from NTA.

I strongly believe that in the round a bus journey from KCR to Westmoreland St (and indeed on to Finglas) will take much longer under BusConnects. This destroys any rationale for the corridor based on time saving.



FORTFIELD RD NARROW TO ICLER

Appendix 10 Area covered by scheme

I think the NTA themselves effectively acknowledged for the outset that this corridor is not vital in the same way as any other corridor. As noted above it's not in their 2016-2035 Dublin area plan. When the project started, the proposed bus service on the KCR to Sundrive Cross portion of the corridor was two services F1 and F2, each with a half hour frequency (see map of initial proposal annexed) . These buses were local services, both starting at the Spawell.

I believe the increase in the service level since then is in part a contrived attempt to bolster a very weak case for the corridor, although the retention of the 9 (F3) is welcome. Further services from new areas of Firhouse which never went near that corridor are being added.

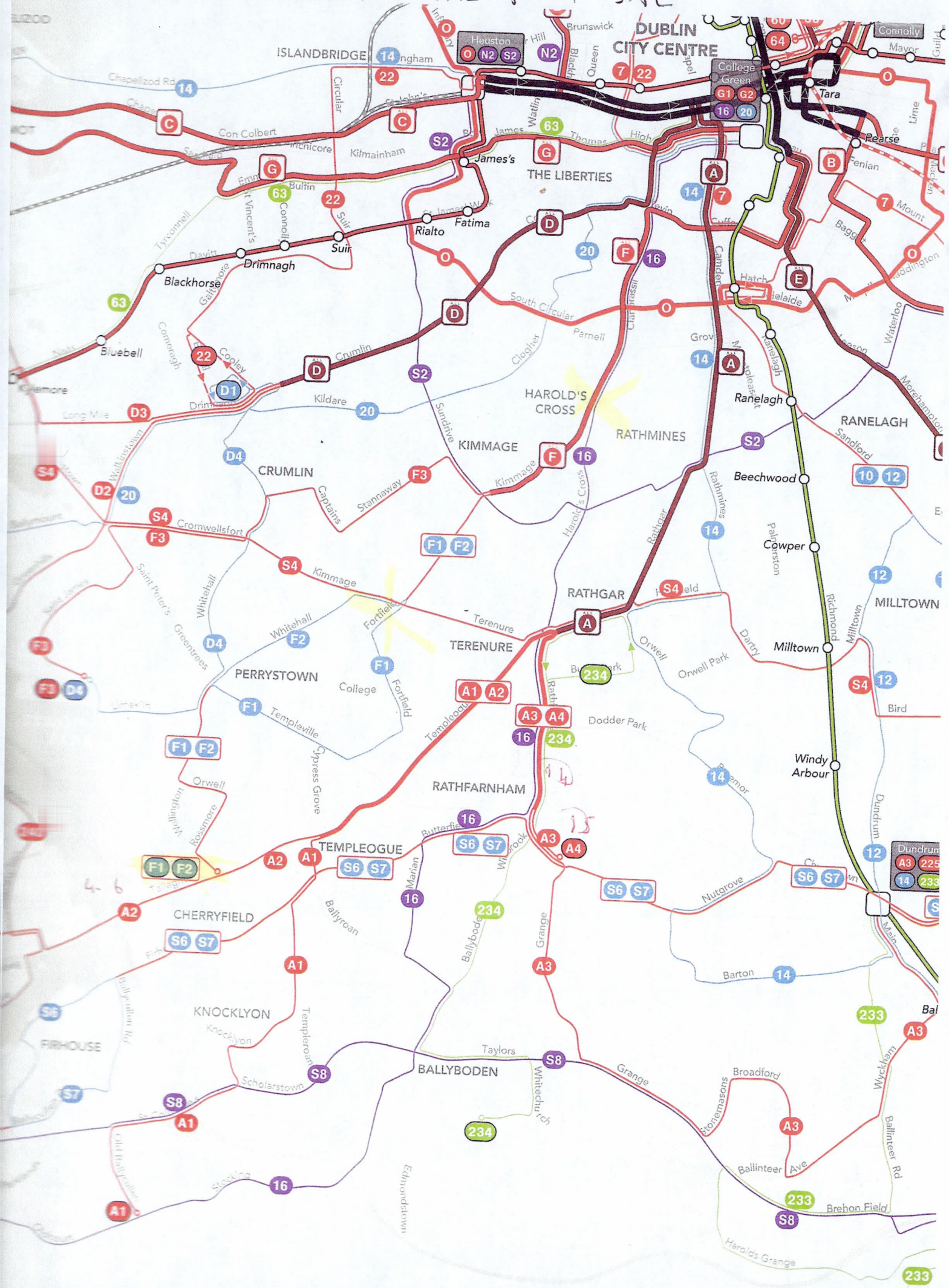
Substantively the purpose of this corridor should be to service areas the city side of Tymon Park. Unlike most other corridors, the corridor should not be relevant to areas beyond the M50, as all those services have to go onto another corridor either 9 or 10 to cross the M50.

These areas to the south and west of KCR have populations by electoral division of 4,951 Kimmage Manor 2,940 Greentrees, 2,211 Cherryfield, 2,401 Terenure St James, 3,793 Templeogue Limekiln, 2,260 Templeogue Osprey, 1,985 Templeogue Orwell ,3,512 Kimmage E, 2,430 Walkinstown C , just over 25,000 in total. I have not included areas adjacent to the A or D corridor as they would use those services. This is a very small population feeding into a bus corridor, likely the smallest in the city and this does not require the level of measures proposed.

These areas have an older age profile and I doubt they generally need a service that is a few minutes quicker, particularly if that is at the expense of their neighbours. I don't think 2022 age breakdown has yet appeared but for example in 2016 25% of the population of Greentrees was over 65 as compared with a national position of half that.

I should also note that there is no need for a dedicated corridor to have a city bound spine. The H spine buses from Howth, Portmarnock etc are working apparently very satisfactorily without the benefit of any specific infrastructure. The population that has to be served by the H spine is much greater than the F spine southside community. I think the H bus principle is equally applicable to the southern end of the F service.

INITIAL PROPOSAL



ISLANDBRIDGE

DUBLIN CITY CENTRE

THE LIBERTIES

HAROLD'S CROSS

RATHMINES

RATHGAR

TERENURE

RATHFARNHAM

TEMPLEOGUE

KNOCKLYON

BALLYBODEN

RANELAGH

MILLTOWN

DUNDUM

BALINTOON

233

Appendix 11 Dangerous turns at Fortfield

I think that the imposition of a bus gate at Ravensdale is likely to lead to serious accidents at two junctions to the south of it. I am very familiar with these junctions as I use them a lot and I have seen quite a few near misses due to unsafe right turns.

The first such junction is that at Wainsfort Road and Fortfield Road ("Wainsfort Fortfield turn ") where a right turn is lethal.

The second such junction is at Kimmage Cross Roads between Fortfield Road and Terenure Road west ("Fortfield TRW turn"). This is even more lethal.

Wainsfort Fortfield turn

The Wainsfort Fortfield turn is direction C to B in the traffic survey 10-17 carried out on 26 November 2019. On that day 211 vehicles made that turn – this is a very low rate for a very busy junction. On that day a total of 7,204 vehicles exited Wainsfort Road, so only 3% took a right turn. The highest quarter hour total in the survey for the Wainsfort Fortfield turn seems to be 6 vehicles. If Lower Kimmage Road is to be blocked by a bus gate the proportion of this 7,204 that will turn right will go up exponentially. They will be crossing outbound traffic which will still be substantial. I think forcing extra cars into this right turn is a serious safety issue and wholly contrary to good planning.

Survey 11-1 covers the same junction but with the relevant direction now being D to C and the survey done on 21 November 2019. The comparative figures are 246 and 7,243.

It is my belief that rather than brave the Wainsfort Fortfield turn, traffic will instead turn right into either College Drive or Wainsfort Park. This will create an intolerable amount of extra traffic on those residential roads and of course also involves a right turn manoeuvre. I don't think they did a survey for either of these junctions. Any reasonable public body would have done such a survey given that they propose to vastly increase the traffic turning at those junctions and create a safety hazard , by imposing a bus gate at Ravensdale.

Fortfield TRW turn

The Fortfield TRW turn is direction C to B in the traffic survey 10-19 carried out on 26 November 2019. On that day 197 vehicles made that turn – this is also a very low rate for a very busy junction. On that day a total of 8,583 vehicles exited Fortfield Road, so only 2% took a right turn. The highest quarter hour total in the survey for the Fortfield TRW turn seems to be 5 vehicles. If Lower Kimmage Road is to be blocked by a bus gate the proportion of this 8,583 that will turn right will go up exponentially. They will be crossing outbound traffic which will still be substantial. I think forcing extra cars into this right turn is a serious safety issue and wholly contrary to good planning.

Survey 11-3 covers the same junction but with the relevant direction also being C to B and the survey done on 21 November 2019. The comparative figures are 232 and 8,785.

If a lot of extra vehicles turn into Terenure Road West, this will increase the congestion on what is already a seriously congested road. There are three key bus services on this road, the S4, the 74 and

the 81 (now 15A). There is no explanation given in the planning application as to why NTA want to seriously disadvantage the speed of these largely cross city services to allow for a very miniscule and questionable time saving. This road is also a busy school route with the Presentation School on the route.

It is my belief that the creation of a series of dangerous right turns, currently not widely used, is in itself a reason why you should entirely omit the gate proposed adjacent to Ravensdale Park. If NTA had read their own traffic surveys they could easily see how little used the two turns are and the reason seems blindingly obvious if there was a site visit. Further the level of congestion they will create on Terenure Road West is unacceptable.

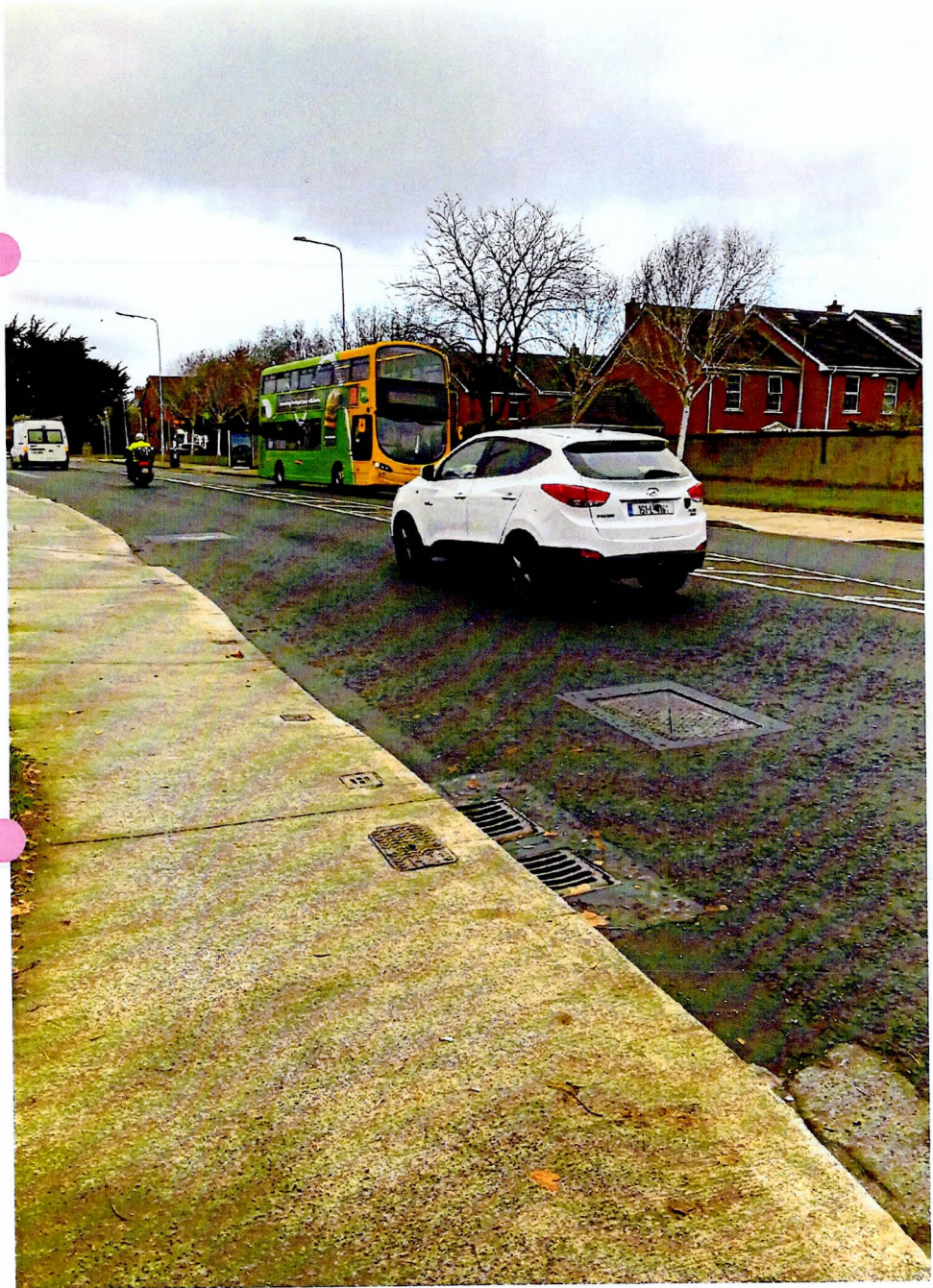
I should reiterate my point made in other submissions particularly that related to Templeogue Rathfarnham no 316272 that these traffic surveys are a mess compared to the clear IDASO surveys done for the north side. Further it is very sloppy indeed to have two different direction schemes in

surveys 10-17 and 11-1 for the Fortfield Wainsfort junction. Further the surveys are hopelessly out of date and should have been repeated before the planning application, not least to reflect post Covid conditions.

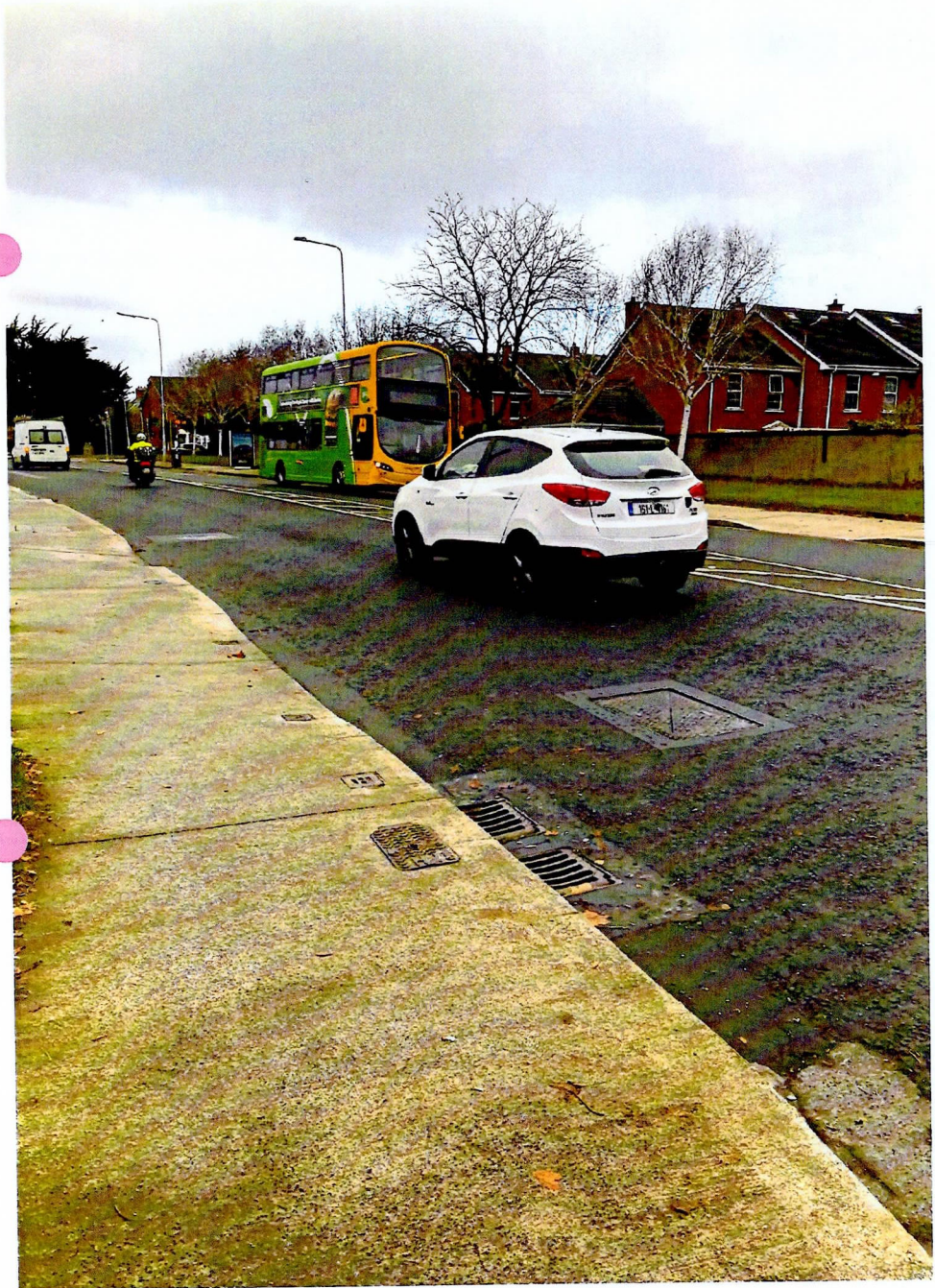
I am cross referring to Appendix 3 from my Templeogue Rathfarnham submission to highlight the serious deficiencies with the traffic surveys.



DANGEROUS TURN FORTFIELD - WAINSFORD



16 IMMAC RD W AT ST ANNE'S



16 IMMAGE RD W AT ST ANNS



FARFIELD RD NARROW TO ICLR

APPENDIX 12

BUS GATES

It is my contention that there is an excessive use of bus gates across the entire BusConnects project and in particular in this Kimmage scheme which has four separate bus gates, more than any other. In particular in the context of bus gates

1 There is an unfairness as between northside and southside in the level of use of bus gates

2 the net effect of all the bus gates in the south city is to impede access to all the canal bridges between Crumlin Road and Lower Mount Street, so that any car traffic wishing to access the centre or northside has to make a long diversion to those points. Omitting the four on this corridor would ameliorate the position.

3 little thought seems to have been given to the times of operations of bus gates. In principle I don't have a major issue with justifiable bus gates applying in the morning peak or the concept that they start at 6.00 am. If a bus gate stops traffic going into the city in the morning, the traffic is not there to come back in the evening.

4 I cannot see any justification whatever for bus gates to operate on a Saturday or Sunday or indeed bank holidays. The failure of NTA to provide traffic counts that are easy to digest for the southside is a material impediment to assessing the position. In particular as is the case with Kimmage village, there should be a higher bar to justifying Saturday and Sunday, as these are likely to be among the peak trading days.

5 There are inadequate traffic models to assess the impact of all of these bus gates and in particular I have no faith whatever in any of the tiny maps with blue and red lines of arguable dimensions. The matter should be remitted for traffic modelling focussing on all of the bus gates as they operate collectively.

6 there is a complete failure to analyse whether traffic priority lights will achieve what is required, even to the extent of deliberately not mentioning them in a voluminous planning application as with Terenure.

7 the introduction of extra bus gates in the case of Kimmage happened at the exact stage of the process where COVID effectively closed down consultation.

International experience in suburban areas

It has proved impossible at public engagement to have the NTA point to any international cities where bus gates are extensively used in suburban areas. I believe if the Bórd are to allow them, NTA must give further information.

I recently visited the city of Freiburg in Breisgau in south western Germany, which is reputed to have one of the best public transport systems in the world. This city despite being relatively small has an extensive tram network. I have travelled most of the lines and there is no example that I have seen of other traffic being excluded from a suburban street on which a tram runs. Some photos are included.

I am reasonably familiar with Edinburgh, which is a city more comparable with Dublin, There is a dedicated bus access in the immediate west suburban area of the city, but this uses what I suspect was an old railway line, which would never have been a key traffic artery,

I suspect that the absence of any reference in the application to any international comparators is because none exist and that a proposal with numerous bus gates including four on this corridor is without precedent in any city which manages its public transport well. I am very dubious about solutions being imposed on Dublin as a "guinea pig".

I think it is reasonable to ask NTA to provide information on international precedents if any.

The fundamental objection to bus gates

The provision of bus lanes per se or dedicated bus priority lights is not in my view in substance a problem and I don't believe I have raised any objection to those in any submission. However I have a significant issue with bus gates as they seriously impede access to places and are very inconvenient in particular for those who live close by.

If there is a bus lane on the road and there is also a general traffic lane, the car owner can drive up and down the road; it may be slower, but they can use it as they currently do for access.

The net effect of a bus gate is that no one can drive up or down a road. They have to take a much longer journey to get to a destination. While this may incentive people to get the bus, the reality of this scheme is no extra buses over the city as a whole so no where to change mode to; further some car trips are essential. Clearly longer journeys will significantly increase greenhouse gas emissions from all of the petrol and diesel cars. It is clearly contrary to good environmental policy for An Bórd

to allow bus gates, unless there is no practicable alternative. Further the alternative route almost invariably involves deviating into small side roads which were never designed to deal with a significant volume of traffic and this is environmentally hazardous to residents.

Northside and Southside

The bus gates proposed (all proposed to operate 7 days)are I believe

Northside

Ballymun corridor 314610 (1)

top of Mobhi Road sheet 08

Evening peak outbound 16.00 to 20.00

Blanchardstown corridor 313892 (2)

Old Cabra Road sheet 28

Inbound 24 hours a day

Old Cabra Road sheet 29

Outbound 24 hours a day

Prussia Street sheet 32

Outbound 24 hours a day

South side

Liffey Valley corridor 314056(1)

James's St inbound sheet 24

6.00 to 10.00

Mount Brown outbound sheet 23

16.00 to 20.00

Tallaght corridor 316828 (1) Clogher Road sheet 42 (no taxi exemption)

Inbound 24 hours a day

Outbound 24 hours a day

Kimmage corridor (4)

Lower Kimmage Road at Ravensdale sheet 1

Inbound 06.00 to 10.00 and 16.00 to 20.00 (note only time limited inbound gate working pm)

Outbound 06.00 to 10.00 and 16.00 to 20.00 (note only time limited outbound gate working am)

Lower Kimmage Road at Mount Jerome sheet 6

Inbound 24 hours a day

Outbound 24 hours a day

Lower Kimmage Road at Hospice sheet 6(St Clare's Avenue)

Inbound 06.00 to 10.00

Outbound 24 hours a day

Five way junction at Harold's Cross Road sheet 14

Outbound 24 hours a day

Templeogue/Rathfarnham 316272 (2/3)

Templeogue Road sheet 37

Inbound 06.00 to 20.00

Rathgar Road sheets 8 to 11

In substance the very long bus corridor on Rathgar Road operating 24 hours a day is a very long outbound bus gate and should fairly be considered as such

Lower Rathmines Road sheet 13

Inbound 06.00 to 20.00

Outbound 06.00 to 20.00

Bray corridor 317742 (1)

Lower Leeson Street sheet 1 no taxi exemption

Inbound 06.00 to 10.00 and 16.00 to 20.00

Belfield Blackrock corridor 313509 (1)

Pembroke Road sheet 19 no taxi exemption but public service exemption and indeed no bus exemption

Inbound 06.00 to 20.00

Outbound 06.00 to 20.00

I believe there are other restrictions on the Templeogue Rathfarnham corridor and on the Ringsend corridor that could be treated as bus gates, but all are within the canals.

It is self evident from the above that there is an over concentration of bus gates on the southside of Dublin and I believe most of them should not be permitted or curtailed. I have made this point in other submissions.

Access to Canal Bridges

These bus gates impede access to Sally's Bridge (Clogher Road bus gate), Emmet Bridge (Harold's Cross Road) Portobello Bridge (Lower Rathmines Road), beyond Leeson St Bridge (Lower Leeson St) and Baggot Street Bridge and Huband Bridge (Pembroke Road), While the bridge at Ranelagh is theoretically accessible, the turn bans in Ranelagh and the one way system on the city side render it an impracticable option.

There is no impediment whatever proposed for canal crossings on the north side of Dublin.

Hours of operation

There is a bewildering array of hours of operation. This renders the explanation given to justify times in response documents laughable. In the NTA Ballymun Finglas response document at page 45 it was stated that

“The operation of a traffic management measure is more effective if it is as **simple as possible** to follow. In this regard it is best for the Bus Gate to operate 7 days per week, which will reduce the information to be communicated to drivers on advance signs. It will also be easier for drivers to remember that they should avoid this route always in the evening. Traffic on Saturdays can often be as busy as a weekday, particularly with large local trip attractors such as the GAA and soccer clubs, and there will be a need to safeguard the reliability of bus services running to their timetable and headways at all times, which will be guaranteed by 7 day operation of the proposed Bus Gate.”

I do not think that a scheme where different bus gates have different hours and different vehicles that can use them is in any way as “simple as possible”. I would suggest that a system where permitted inbound bus gates operate morning only and permitted outbound operate evening only would be far more consistent with what they say.

In particular on Kimmage, what they said in the context of Ballymun is completely nonsensical with three different hours of operation. It would help to keep things as “simple as possible” if any gate permitted for Kimmage operated morning peak inbound only Monday to Friday only, as the drivers who apparently can't remember things would find that simple to remember.

I note in the response on Liffey Valley at page 15 that after quoting a paragraph from the scheme description about ongoing review and stating that “The NTA and local authorities will co-operate in good faith to address any issues with the hours of operation that may arise during the lifetime of the proposed scheme” the NTA seem to assert that “the exact operational hours may need to be refined as traffic patterns change over time”. It would be wholly unacceptable that any increase could be imposed by NTA with or without the concurrence of local authorities and I think any permission needs to prevent hours of operation being altered without a planning consent.

I should also say that I support the idea of local residents being able to use the bus gate as mooted at page 16 Liffey Valley response and it is very easy to change Article 32 cited there to provide that registered local users may enter a bus gate (not a bus lane). I think it would be a good idea to make it a planning condition that this Article 32 be changed. If the Department of Transport and NTA want bus gates, they can procure this, so it is not an unreasonable condition.

Saturday Sunday

I think the explanation given in the Ballymun Finglas response quoted above is very unconvincing. In any event the Kimmage area would not have the GAA and soccer club stuff that affects Mobhi Road.

Because of the poor quality traffic counts on the southside about which I have previously observed, it is exceptionally difficult to compare peak hour Saturday and Sunday on this Kimmage corridor. Mobhi Road was favoured by having IDASO traffic counts and indeed ATC 3-4 is on Mobhi Road.

It is easy to see for Mobhi Road that on Monday 24 February 2020 between 16.00 and 20.00, there were 2,087 northbound vehicles at "bus gate" time. By contrast on Saturday 29 February there were 1,397 and on Sunday 1 March there were 1,386 at the same times. This should enable a judgment as to whether Saturday or Sunday are permitted in those circumstances. If NTA read their own traffic reports they would see that it is not correct to assert that traffic on Saturday is as busy as a weekday.

Were one assessing an inbound bus gate there (Ballymun) the comparison 06.00 to 10.00 is 2,743 on Monday and 696 on Sunday.

If NTA had provided user friendly statistics for Kimmage, it would be easy to do numbers. But they decided to provide unintelligible data for the southside despite a clear position from the Information Commissioner already fully set out in my Templeogue Rathfarnham submission.

I think survey 11-2 relates to the Lower Kimmage Road and on Friday 22 November 873 and 2,467 used the road 06.00 to 10.00. The comparator numbers for 24 November were 525 and 816 respectively. A bus gate would not have been required on 24 November. It has taken me about 20 minutes to do the math .

I think it is clear from the stats that there is zero justification for any bus gate on Lower Kimmage Road on a Sunday morning.

A particular consideration that applies here is all the businesses at Sundrive Cross and the "religious activities". I would expect that a lot of these businesses do a very substantial bit of their trade on Saturday and Sunday and that there is a strong case in the interests of helping to keep these businesses viable that bus gates do not apply Saturday or Sunday. This is different from a lot of other corridors, where bus gates are not an impediment to the viability of a village. Further Mount Argus Monastery and Mount Jerome Cemetery are important for locals and free access on Saturday and Sunday would be appropriate. Personally it inhibits me from visiting my grandmother's grave easily.

Again I believe NTA should be directed by you to provide traffic counts for this corridor presented in a similar format to that used by IDASO and that people be given the opportunity to comment on them. To do otherwise is to sanction their discrimination against the southside and their ignoring of the clear views of the Information Commissioner.

Modelling

The standard of modelling provided by NTA is grossly inadequate and frankly cannot be trusted. There should have been specific modelling exercises on the southside identifying the effect of blocking off access to all the canal bridges.

The modelling presented on the Kimmage scheme is not credible as regards bridges. A couple of examples

On page 91 Traffic and Transport, there is alleged to be no change in the traffic flowing east along the canal from Emmet Bridge. If a significant source of input ex Harolds Cross Road is excluded on

account of a right turn ban, this is simply not correct, Further how could there be an increase west of there with no increase on other roads at that junction?

On what I believe is supposed to be integrated modelling, Traffic and Transport diagram 6.13 AM peak 2028, it seems not believable that there is no impact on traffic on either St Stephens Green South or St Stephens Green East despite a bus gate barring all traffic entering those roads from Lower Leeson Street.

I think the modelling work all needs to be done again, as it is useless for any assessment. Further the traffic survey deficiencies on the southside are a material impediment to assessing the credibility of very poor modelling.

Priority lights

There is no evidence whatever in the document that any thought has been given to using priority lights on the relatively lengthy stretches of both Lower Kimmage Road and Harolds Cross Road where three or four lanes are possible and where general traffic could be "stacked" to allow buses priority. The whole BusConnects project is extensively reliant on bus priority lights as is clearly set

out in the Environmental Impact Assessment on each scheme under Bus Priority Provision 4.6.4. The alternative of priority light has not been assessed at all for Kimmage where the bus gates are clearly very damaging to both local connectivity and environment. It is noticeable at Chapter 4 despite a page of bumph in chapter 4 identifying it as an alternative, there is no discussion of bus priority.

Closed down consultation on COVID affecting Kimmage

The two bus gates at either end of the Kimmage sequence are different from all of the others in that the first time they were generally mooted and consulted on was in or around March 2020 when

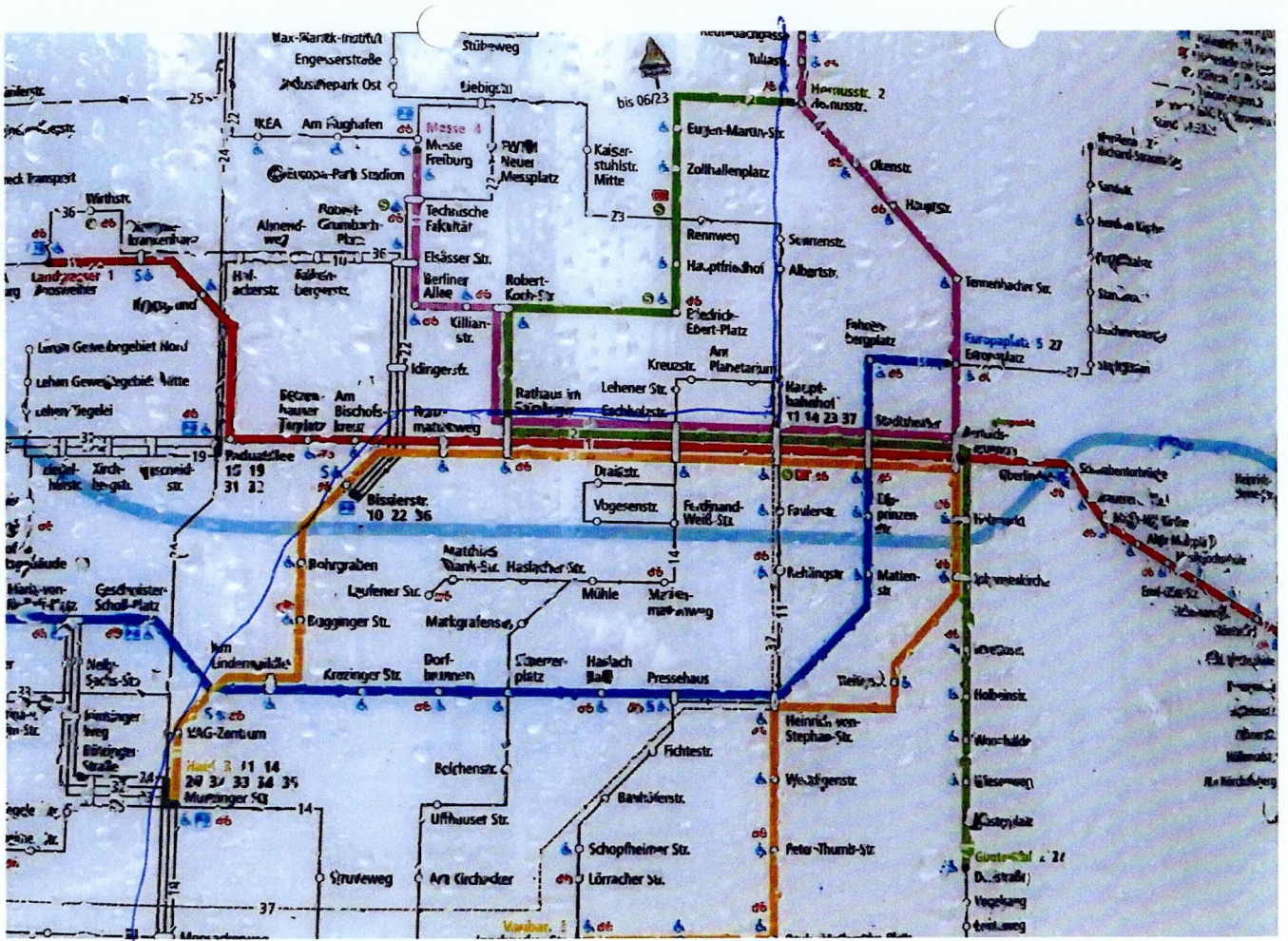
COVID became an issue. It is my clear position that they have never been “consulted on” in any meaningful way. I think all of the other bus gates around the city were part of the original process

and whereas they may have shifted a bit in their exact location, there was a minor degree of open public discussion about them. I think there has been a fundamental unfairness about attempting to

foist a bus gate post COVID which cuts Kimmage off from its hinterland, including all of west Terenure.

Conclusion

I submit that in the overall picture of bus gates across the entire scheme, the Kimmage bus gates are excessive as to their hours of operation. Ideally all three of them should be omitted as the damage to environment and connectivity locally is wholly out of proportion to the benefit they provide. I think the “closest for comparison” set of bus gates to the Kimmage corridor are those on the Ballymun corridor which are evening peak only. It is wholly irrational to so provide for Ballymun but not do the same in Kimmage. If there is an issue in Kimmage it has more to do with morning peak.



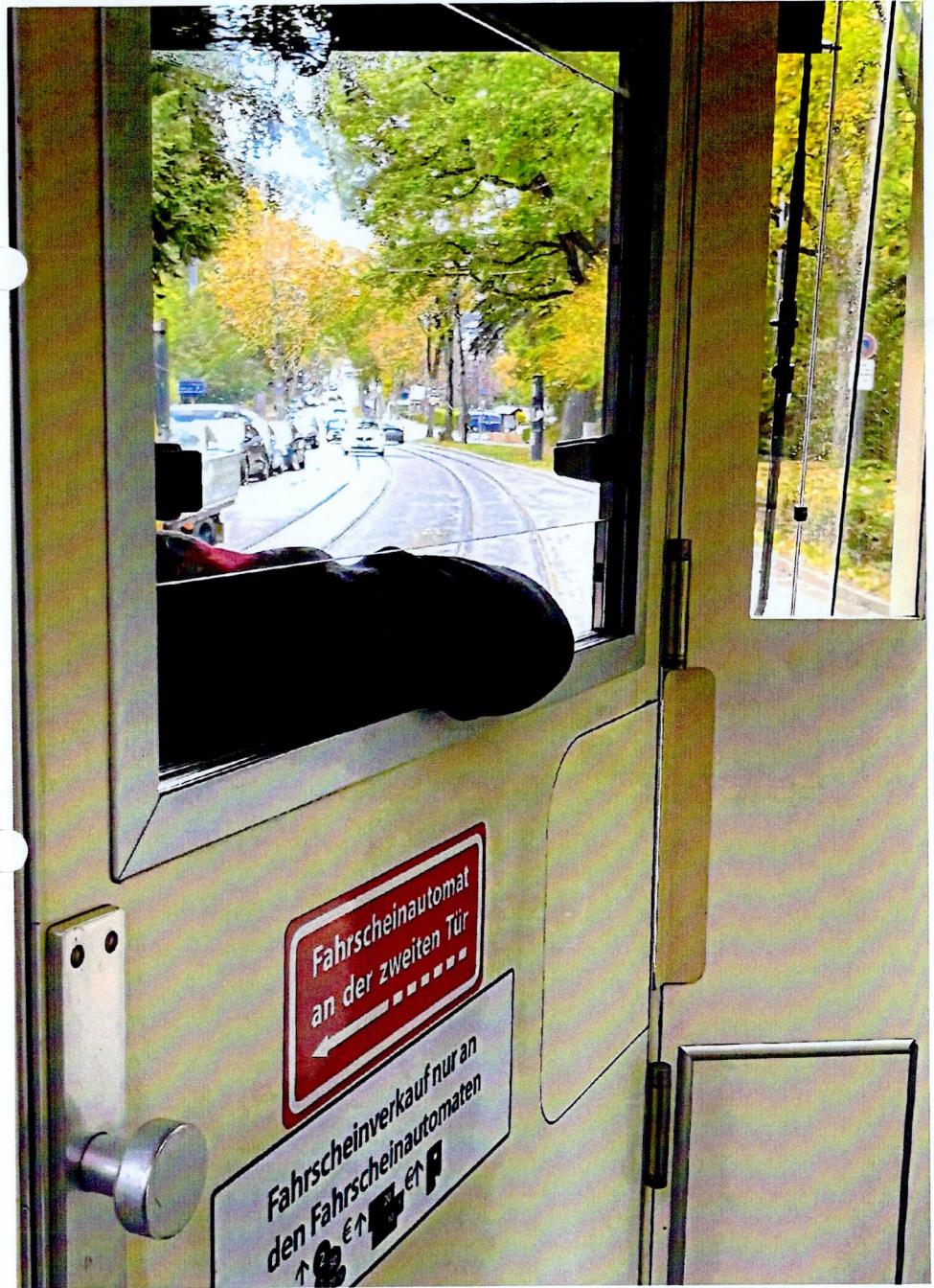
ALL SYSTEM TRAVEL EAST OF LINE



FRIBURG CAR SHARES TRAM TRACK BEFORE THIS POINT



FREIBURG - CAR UNDER BRIDGE SHARES TRACK



FREIBURG - CAR ON TRAM TRACK (SHARE)