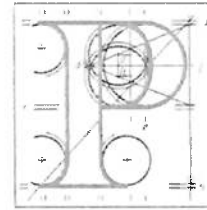


Our Case Number: ABP-317660-23
Planning Authority Reference Number:



An
Bord
Pleanála

Recorders Resident's Association
c/o The Secretary
39 Whitehall Road
Terenure

Date: 18 December 2023

Re: Bus Connects 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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RECORDER'S RESIDENT'S ASSOCIATION

RECORDER'S RESIDENT'S ASSOCIATION'S SUBMISSION RE 'F' CORRIDOR: Kimmage to City Centre December 2023.

STRATEGIC INFRASTRUCTURAL DEVELOPMENT HA29N 317660 An Bord Pleanála Ref: 317660 Kimmage to City Centre Core Bus Corridor

Executive Summary.

We can see the potential value of BusConnects in some areas of the city, particularly when it runs along existing QBC's, and is enhanced by rail, and would fully support it if our circumstances were similar. They are NOT.

There are three corridors that affect our residential area:
The 'A' Corridor - Templeogue/Rathfarnham to the City Centre.
The 'D' Corridor - Clondalkin/Tallaght to the City Centre.
The 'F' Corridor - Kimmage to the City Centre,

Thus a very small residential area will be disproportionately impacted by the changes planned and by the cumulative effect of the three corridors.

From 2018 – 2020 discussions and forums referred to these corridors by the letter of the bus route that will run on it.

- For Clarity: Please note that within our submission, for the most part, we refer to the Core Corridor by the initial of the bus route on it.

Comparison with other Core Corridors:

Corridor 'B' 'C' 'D' 'E' 'G' 'H' have rail or Luas lines in tandem with buses.

Corridor 'A' and 'F' are unique in that they have NO rail or Luas lines and are therefore totally dependent on buses.

- They have short interrupted stretches of Bus Corridors – *not quality ones* – and narrow streets.
- Most importantly NO rail to augment it.
- And astonishingly, *no hint of a plan until after 2042.*
- Thus, allowing for delays etc in the planning process, we must wait till 2050 or longer *for meaningful* improvement in Public Transport in our area.

The 'A' and 'F' Corridors serve Dublin South West's population of 350,000 – which is steadily growing. The City Edge Project is likely to be started before 2042. This will add considerably to the need for better Public Transport.

It appears to us that the planned low increase in bus numbers, over our corridors which, coupled with Draconian road closures, lead us to be very negative about how this proposal could possibly work given the:

- Low increase in the number of buses planned as per Oct 2020.
- Even if there was a higher increase in bus numbers there is a significant risk that the progress through the city centre would be impossible due to increased demand on remaining viable streets post 2023 plan to close many centre city streets. .
- Car Usage remaining virtually static due to no feasible alternative transport.

We therefore recommend that An Bord Pleanála should refuse this Planning Application for the Kimmage to City Centre Core Corridor until such time as there are sufficient options for Public Transport. Metro is needed to augment this.

We will deal with these issues using our in-depth knowledge of our area and how Public Transport functions, or rather, fails to function.

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

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

5th Dec. 2023

RECORDER'S RESIDENT'S ASSOCIATION
STRATEGIC INFRASTRUCTURAL DEVELOPMENT.
An Bord Pleanála REF: 317660 SUBMISSION RE 'F' CORRIDOR: Kimmage to City Centre.

Dear Sir/Madam,

We wish to make the following observations on the '*Kimmage to City Centre Core Bus Corridor Scheme*'. Also referred to as '*Corridor 11*' but more generally, during the Forum Meetings (for the selected few) referred to as the '*F*' Corridor'.

1.0 Preface:

There are three corridors that affect our residential area:
The 'A' Corridor - Templeogue/Rathfarnham to the City Centre.
The 'D' Corridor - Clondalkin/Tallaght to the City Centre.
The 'F' Corridor - Kimmage to the City Centre,

In reality, the effects of all the corridors are interlinked. Thus a residential area is disproportionately impacted by the changes planned by the cumulative effect of the three corridors.

From 2018 – 2020 discussions and forums referred to these corridors by the letter of the bus route that will run on it.

- For Clarity: Because our area is affected by all three corridors please note that within our submission, for the most part, we refer to the Core Corridor by the initial of the bus route on it.

2.0 Awareness:

Now that all three applications have reached An Bord Pleanála, members of the public are finally privy to the scale of this proposal and its potential to destroy this long established community, many of whom have lived here for generations.

Lack of information to the General Public:

We should have used the word 'some' members of the public....It is astounding, on a daily basis, to discover how many citizens have no idea about it other than ***some airy-fairy thing that people talk about***BusConnects?....or something....but sure wasn't that years ago?.....most are stunned when told of the proposed road closures and other traffic restrictions. Many are still oblivious.

- 2.1** Our residents, have expressed how excluded they feel from the consultation process which has taken place on BusConnects. One has to wonder if there has been compliance with the Aarhus Convention.
- 2.2** It would appear that the greatest lack of knowledge of the implications of BusConnects is on roads that will ultimately carry the brunt of the displaced traffic. Often narrow densely residential roads whose residents did not attend the forums, either by mistakenly believing the corridors were of no concern to them or the fact that no literature was distributed on many such roads. Only those living on roads which were to become Corridors were included in Forums. Stannaway Road, nearby, becoming a replacement road for the Lr. Kimmage Road is one such example. This process was fundamentally wrong for the following reason:

3.0 OLDER SUBURBS:

“Bus Connects will change the physical, economical, historical and social environment of our older suburbs forever. The NTA has taken a template and tried to make it fit everywhere, even in places that aren’t suitable. The project will change the streetscapes, it will change the villages, it will change the way communities operate and circulate. It will inhibit the elderly from leaving their homes and it will turn communities into corridors.”

3.1 Whitehall Road is one of these older suburbs. Every time we leave our front gate BusConnects will change the way we operate and circulate, in some cases for better but in most cases for worse. The proposed closures on Lr. Kimmage Road and the Templeogue Road will impact on us greatly, as Bord Pleanála will hopefully understand from reading this submission.

If one *only* commutes to the city centre and home they will be better off by the option of two buses, on two different routes, namely the ‘A’ corridor and the ‘F’ corridor.

Unfortunately this is not the reality of everyone’s daily life. Since we *live* in a suburb, [not just pass through it] we circulate both **within** it, **across** it and **beyond** it. Daily journeys generally encompass ‘sideways’ journeys – to school, to work, to sports, church, shopping etc.

4.0 MISLEADING INFORMATION:

The title of this application is incorrect in stating that it will be from Kimmage to City Centre, when in fact it will not go further than the bottom of New Street which is on the fringe of the city centre BUT not in the City Centre.

4.1 However, the misleading information continues when one takes cognisance of the **new Draft Dublin City Transport Management Plan**.

Q. What route will both the 81 (15A) and F2 (150) take into the City Centre?

Q. Will the ensuing long walks fall into category of a ‘Walking & Cycling’ city – regardless of ability?

Q. Will this result in a city designed for tourists rather than inhabitants?

Q. Will this result in a city alien to the ‘Grey Brigade’?

Q. Are we not in a ‘cart before the horse’ situation? Should an underground system not have been in place, like every other capital city in Europe, before both BusConnects and the New Draft Dublin City Transport Management Plan are considered?

Q. Tweaks and additions to the existing bus service could have a more powerful impact. The resulting saving of taxpayers’ money could then be put to far better use – the provision of a long overdue underground system.

Example of inconvenience: The 15A used to go down Dawson Street but due to cross city Luas works this was changed, with George’s Street becoming the route. This created an extremely long walk to the Grafton Street and Merion Square areas. Notably the Dublin Dental Hospital and Holles Street. This has recently been alleviated by the new terminus in Merion Square. Albeit a much longer time on the bus, but kinder to the elderly and infirm. However, according to the 2020 Final Routes mapping this will be reversed with Pearse St to Ringsend being the proposed route. The latter is more acceptable to our residents as it would restore our connectivity with the Bord Gáis Theatre.

Cost of same inconvenience: During the Georges St days a taxi to and from the Dental Hospital – Whitehall Road = €40. A large chunk out of a disability payment!

5.0 Observation 2: INCOMPLETE PLANNING APPLICATION.

As with the 'A' Corridor, the current planning application by the NTA, for the 'F' Corridor finishes in 'mid-air' at the bottom of New Street. There is no reference to how the buses on this corridor complete the journey to the City Centre or joins with its North Side counterpart, the 'F' Corridor to Charlestown Shopping Centre. Plans afoot for the now infamous Plaza at College Green would appear to have 'upset the applecart' completely. We reiterate, Cart before Horse?

5.1. We totally understand that NTA is applying for permission for the *Core Corridor only*. They have emphasised this at Forums since the outset of BusConnects' Core Corridor section, by refusing to entertain any questions or comments in relation to routes. In order to comment on their use however we *need to* include the bus routes that will use them...

E.g. As stated in our observations on the 'A' corridor – Planning for a large scale building could be applied for in the same manner, although its use is generally specified at the outset. However, thereafter, the type of business, shops or offices or bowling alley or cinema can be interchanged at any point during the life of the building.

- The streets of our city are a different story – They will always have one function – to carry traffic – generally to a destination.

5.2 Could it be possible that there are no finalised plans as yet and, that compliance with agreed Climate Action targets are forcing the hand of NTA to apply for permission before, *even they*, have a clear picture of how it will all function?

5.3 When the Bus Routes were finalised, at the end of 2020, it was possible work out the continuation to the north side of the city from Georges Street ('A' Corridor); 12 buses per hour would turn left towards Christchurch, and 26 would turn right into Dame Street/Westmoreland St/O'Connell Street. 18 x 'F' Corridor buses (our 2nd bus route) would progress to O'Connell St via Cuffe St, St. Stephens Green, Dawson, Nassau and Westmoreland Streets.

5.4 We now know where the Corridor will end, but have absolutely no idea as to how one will get to the City Centre.

5.5 A spanner appears to have been thrown into the works now as the original route via Dame Street is questionable due to DCC's plan to pedestrianise both College Green and Dame St. A question hangs over the use of Parliament Street also.

A planning application to build a house with no roof shown would likely be refused.

5.6 We now know where the Corridor will end, but have absolutely no idea as to how one will get to the City Centre.

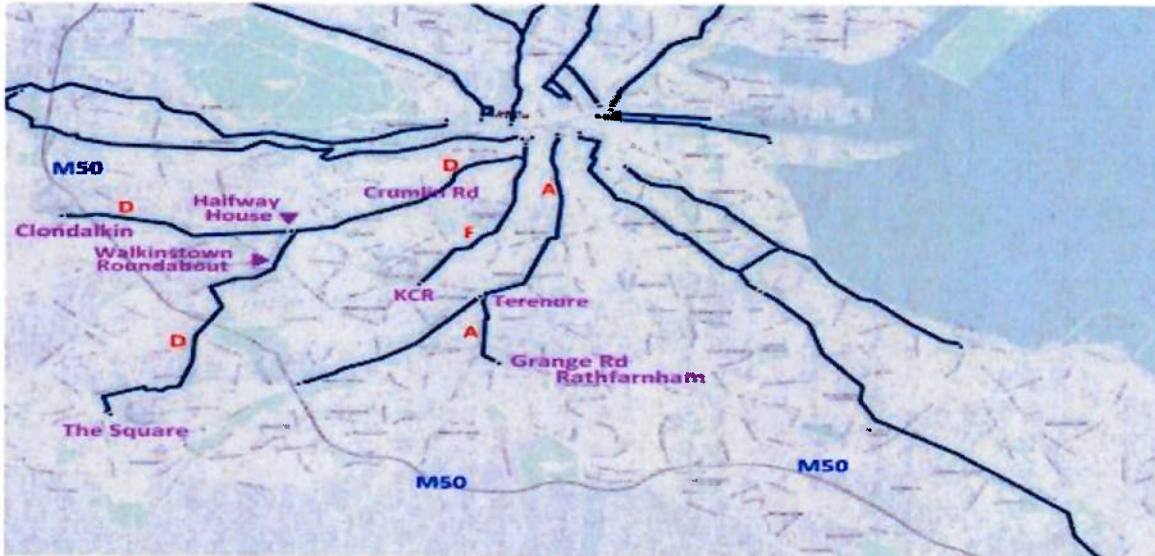
5.7. **Our Observation of this aspect of the Core Corridor Planning Application:**

- Until the final section of this corridor is identified and published by NTA, Bord Pleanála should not make a decision on this Planning Application, as it stands, but should instead have a request for Additional Information applied to it.

6.0 THE CUMULATIVE EFFECT OF DISPLACED GENERAL TRAFFIC FROM THREE CORRIDORS INTO A SIGNIFICANTLY SMALL SPACE/AREA.

Figure 6.1

Three corridors



6.2 Whitehall Road is situated very close to the KCR marked on the map above. A vast number of our daily commutes to work, schools, crèches, churches, funerals, sporting and leisure activities, shopping, visiting friends etc are conducted, through this junction, close to where we live.

A larger picture of our daily movements, although not exclusively, occur within the un-marked section of the M50, Rathfarnham, Point A, Crumlin Road, Walkinstown Roundabout i.e. weaving in and out of several corridor areas of influence.

Cars are rarely taken into the city except in exceptional circumstances and business use. Nonetheless, cars feature very largely in our daily lives as the public transport availability is currently particularly poor and is set to remain so until post 2042. Ref: Table 9.2 Summary of Four Bus Corridors identified by the NTA:

6.3 Ref: BusConnects Dublin – Templeogue/Rathfarnham to City Centre EIAR Vol 2/4 Chapter 21 Pages 8 and 9. 21/2.6.1

“The results from modelling the traffic effects of the combined worse-case scenario in the LAM revealed that there would be significant traffic displacement across the Dublin Area” and at 21.2.6.2

“The following schemes will not be constructed concurrently with adjacent core corridors schemes so as to avoid potential traffic and associated environmental impacts.” - Templeogue / Rathfarnham Corridor and Kimmage Corridor.

We feel that this is an admission on the part of NTA of how badly impacted this whole area will be permanently, by displaced traffic.

We live in the middle of 4 corridors. We will still be struggling to live with the aftermath of this proposal long after the construction diversions are over.

A traffic incident on the N81 in recent months, paralysed not only a 4 sq. mile radius, but also the M50 for a period of about 5 hours.

6.4 We have great concerns that it appears that the full picture regarding displaced/re-routed traffic is being manipulated as were the figures in the Demand Forecasts. See Annex 1.

6.5 Whilst we are aware that planning permission is being applied for each corridor individually, the radius of where we live will be impacted by approximately 36 road alterations generated on the 4 corridors below:

- to the South by the Tallaght Road to Terenure Section of the A Corridor,
- on the East by the Rathfarnham to Terenure Section of the A corridor,
- to the West by the Tallaght to City Centre, D Corridor and
- to the North by the Kimmage to City Centre, F Corridor.

'A' Corridor main impacts:

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

'D' Corridor main impacts:

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

'F' Corridor main impacts:

- The closure of Lr. Kimmage Road from 7.00 am to 10.00 am x 365 to General traffic from Ravensdale to Harold's Cross.
- Evening traffic will be impacted between 4 pm to 8 pm.
- The removal of 3 slip roads at the KCR traffic lights.
- Closure of a section of Kenilworth Road to General Traffic.

6.6 Although not listed above the restrictions of Rt. turns in Ranelagh and Milltown will cause extensive problems when trying to access the Baggot Street and Ballsbridge area. Major difficulties will ensue in accessing Cancer Treatment services at St. Vincent's Hospital.

6.7 Thus the prospect, particularly for this area, is dismal. Residents' daily lives are likely to be thrown into turmoil. Every *essential* trip (for myriad reasons) by car to our local shops, doctor's surgery, dentist, library etc. will all be impacted.

7.0 The 15 minute City.

Aims & Objectives of Bus Connects Core Bus Corridors: “Support the delivery of an efficient low carbon and climate resilient public transport service, which supports the achievement of Ireland’s emission reduction targets”.

BusConnects for cars

- According to NTA, number of car trips will decline by only 1.5% by 2042.
- With reduced road space, slower junctions and more circuitous routes, congestion and journey times will increase.

e.g.	<u>Today</u>		<u>BusConnects</u>	
	Kms	Time	Kms	Time
W’hall Gdns to Bushy Park	2.5	6	5.5	12
W’hall Gdns to Lidl Terenure	1.8	10	4.9	12
W’hall Gdns to Kimmage Family	1	3	3.5	10

(Using Google Maps)

Each and every round-trip journey we make from our homes on Whitehall Road will increase as outlined above. Where then our ‘so-called’ 15 minute city?

Where does this leave our Climate Action Plan? Extra mileage equals extra emissions.

By Bus: To get to Bushy Park by bus will necessitate taking two buses and will take approximately 40 minutes each way when the walk to and from the various buses is taken into consideration. Add in other factors:

- The cost factor for a family?
- The fact that only 1 buggy/wheelchair is allowable per bus.
- Waiting time for the connecting bus. (Wait time 27th Nov 2023 for a 30 min timetabled bus = 49 mins)
- A quick trip to the park turns into a 3 hour affair. Versus 6 minutes each way by car with energy still left to enjoy the park.

7.2 EFFECT ON OUR DAILY LIVING AND COMMUTING - ADDITIONAL FACTOR: DISPLACED TRAFFIC.

7.3 We establish that the above list of impositions will have a massive impact on almost every local journey that our residents will make on a daily basis.

- The cumulative effect of displaced traffic, in the region of 7,000 vehicles a day from the Templeogue Road and approx. 7,000 from the Lr. Kimmage Road and approx. 9,000 from the Rathmines Road. In the region of 23,000 vehicles - all seeking an alternative route.
- Caveat: It is worth noting that these figures were sourced from NTA’s, out of date, traffic surveys from late 2019 and early 2020. Therefore these figures may be underestimated as they are almost four years out of date.
- Displaced traffic seeking a route to a Canal Bridge crossing - due here to a combination of the above Road closures.
- Portobello Bridge will no longer being an option.
- Harold’s Cross Bridge, although possible, will be much more inaccessible.
- Traffic diverting from the N81 at Spawell in order to find a less constricted route ahead.

- The closure of Kenilworth and the prohibited Right Turn from the Canal to Grove Road add even greater difficulties in accessing Rathmines and other destinations further east. A key east – west route.
- Diversions and road closures along Kildare & Clogher Road will add further to the ‘pressure cooker’ effect in the confined area between the Crumlin Road and the Lr. Kimmage Road.
- St. James Hospital, our local hospital, is accessed by car for the most part (people who are unwell). The route to this hospital is frequently via Stannaway or the various roads leading to the Crumlin Road. By car approximately 20 minutes. By Public Transport in excess of 1 hour in each direction.

7.4. Spawell Roundabout Signalised:

Daily use of the approach to this roundabout from the M50 informs one that, at peak times, the queue commences just after leaving the M50 / Spawell Interchange Roundabout. This generally ‘moves well’ as vehicles slot into gaps on the Spawell Roundabout. With an expectation of waiting for changes of lights here, one can’t help wondering if you will even be able to exit the M50 or will you sit in an even longer queue on the slip road off it.

7.5 Templeogue Road Bus Gate and necessity to divert off same.

The result of all the diversions will be very damaging to Wellington Lane, Whitehall Road and Rockfield Avenue as most inbound traffic may turn off at Spawell.

Currently, of 25,000 vehicles approach the Spawell Roundabout. 7,000 Vehicles turn off the N81 into Wellington Lane. 12,794 continue towards Templeogue Bridge. With no through route ahead we reckon the numbers turning off at Spawell will increase considerably. We believe that number could be in the high thousands.

7.6. Lr. Kimmage Road Bus-Gate knock-on effect:

Stannaway Road set to become the ‘new’ Lr. Kimmage Road. It being the only route to the Canal left available to motorists. Whitehall Road and Rockfield Avenue are the natural feeder routes to Stannaway.

7.7 Thus, Wellington Lane to Whitehall Road and Rockfield Avenue become the main route to Stannaway Road which becomes the obvious Lower Kimmage Road *replacement* option; with Sally’s Bridge being *virtually the only way* of crossing the Canal on the western flank of Ranelagh.

Whitehall Road currently with just under 1000 vehicles per hour, and is set to become a busier thoroughfare than the Templeogue or Lower Kimmage Road, due to the combination of the re-routing of the 150 (F2) down Whitehall Road as opposed to Whitehall Road West, coupled with diverting traffic – and all this coupled with the proposed double cycle lane.

- Templeogue Road, per BusConnect 2020, a three lane road, will have 10 buses per hour, a bus-gate and no general traffic.
- Whitehall Road, per BusConnects 2020, a much narrower road ranging from 26.13 ft – 30.3 ft wide, will have 10 buses per hour, a double cycle lane and traumatised residents.

7.8 KCR Junction re-aligning.

The stripping away of the 3 slip roads at this junction, in particular *the very busy approach from Kimmage Road West* will, we believe, result in massive queuing.

- The right-turn here leads up Fortfield Road to 3 local schools, St. Pius, Terenure College and Our Lady’s. There is also the entrance to the KCR Garage forecourt and shops.
- Straight on leads to 5 more schools, Presentation, Terenure Boys School, Zion, High School and Rathgar National. It also leads to one of our major shopping areas.

The left turn to Lr. Kimmage Road clears this road very quickly as there is a filter lane on it.

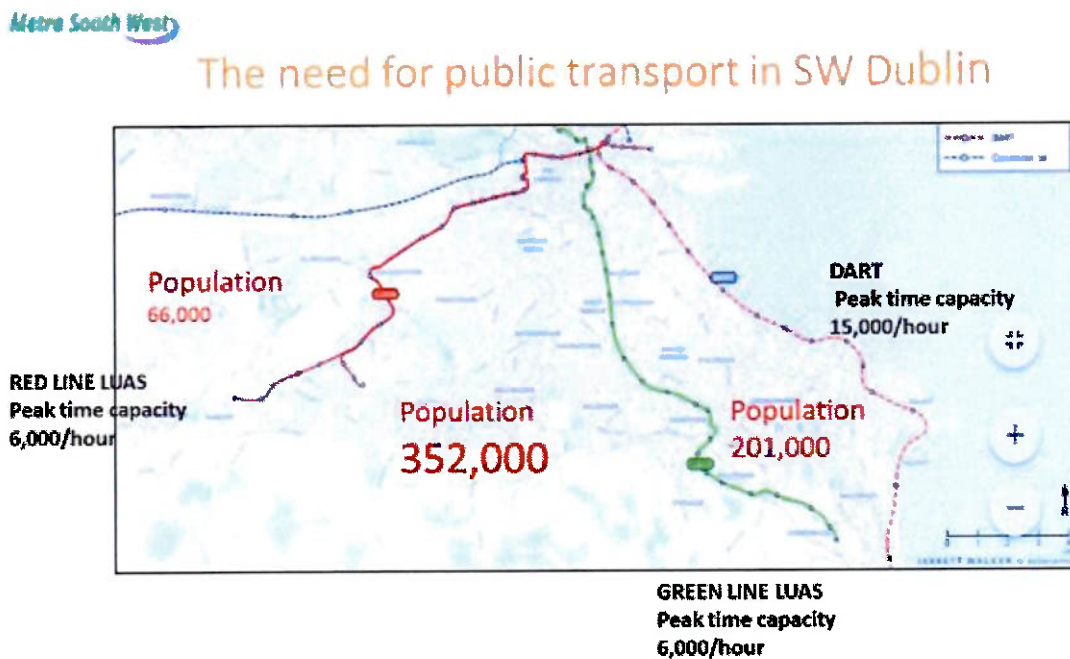
- According to the Transport Strategy for the Greater Dublin Area 2022 – 2042 there will only be a 2% reduction in cars/vans and delivery trucks in the Greater Dublin Area in 2042, if all the measures in the Strategy are implemented. Therefore the expectation is that the volume of traffic through this junction will remain similar.
- Whitehall Road is a feeder road for the new F2 (150) and the 81 (15A).
- Kimmage Road West is a feeder road for F3 (9), F2 (150), 81 (15A) and the S 4 (17) Orbital Route

7.9 Aims & Objectives of Bus Connects Core Bus Corridors:

“Enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movement over general traffic movements”.

8.0 One could be forgiven for asking the question – how then will time savings be achieved when buses will be caught up in these queues on the feeder roads to the corridors?

Figure 9.0 Population of South West Dublin.



Platform for Change 2001 recommendation. Ref: Summary p.44

- Tallaght to the City Centre cannot be served by a single on-street light rail line, so a line with segregated running through Kimmage (the route of highest demand) is required.

It should be noted here that a line running underground from St. Stephen’s Green to Kimmage and over-ground to Tallaght was mapped at that time. In true Irish form it was shelved. Copy available if required.

9.0 NTA’s ASPIRATION FOR TIME SAVING AND THE NATIONAL ASPIRATION TO USE OF PUBLIC TRANSPORT

9.1 Let us look at the table of buses planned under BusConnects (New Dublin Area Bus Network / Network Implementation pages 13 -21, NTA September 2020) on the 3 / 4 corridors that surround us:

9.2 Table 9.2 shows the details:

**Table 9.2 Summary of Four Bus Corridors identified by the NTA:
Number of Buses and Passenger Capacity in-bound to the City
in the 7am to 8am Peak Hour from Specific Locations on the Corridors**

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

- Under *BusConnects*, the projected increase in the number of buses going into the city in the peak morning hour is very small.

9.3 'A Platform for Change' 2001: Page 25. Para 3:

"In summary, the analysis of the 'Comprehensive Bus scenario established that buses alone could not address the problem because in many of the main transportation corridors the bus mode cannot provide the necessary capacity to cope with the forecast demand."

The findings were: Page 25 para 2:

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

Thus the impact on this area of South West Dublin will come to fruition as forecast in A Platform for Change in 2001:

9.4 Based on the scant increases in the number of buses to service the South West Area, ie the area between the Red and Green Luas Lines, it would suggest to us the following. That by 2036 the same scenario as today will exist, ie., *the same lengthy time frame* for getting from Whitehall Road to the city centre - and the possibility that a bus might not even show up.

9.5 Just as many, if not more, people will still be in their *electric* car trying to get to work because they won't all fit onto the buses even if they so wish.

9.6 The NTA has asserted, without evidence, that the proposed bus corridors can carry “multiples” of the number of buses set out in the *BusConnects* plan. This is entirely fanciful as the corridor would struggle even to accommodate the planned numbers of buses under *BusConnects*.

9.7 From the latest figures produced by the NTA it would appear that in the region of 56 buses would be needed in the peak morning hour to meet the transport demand. If 56 buses go in then 56 must go out. Total through the narrow village 112 buses per hour, coupled with traffic to Aldi, the Church, the Boys school and General Traffic.

9.8 In their application to An Bord Pleanála, **NTA have not stated the number of buses on each corridor.** However, from the latest figures produced by the NTA it would appear that in the peak hour, a minimum of 56 buses per hour would be needed to meet the transport demand on the Templeogue Rathfarnham Core Corridor / ‘A’ Corridor.

Quote “A Platform for Change”

“The physical infrastructure required for such a frequency of buses would greatly reduce road capacity for cars and goods vehicles and average radial speeds for these vehicles entering the city would be8kph”.

9.9 With an expected price tag of €4.2bn the Government/the Tax Payer’s pocket will be €4.2bn lighter – but will we be better off in terms of public transport? Extremely doubtful.

10.0 Orbital Routes.

Car/Van Journeys -Ex Whitehall Road to *anywhere* will now create a need to find an alternative route for almost every *essential* car/van journey.

- Many will be taken on the Orbital Routes since vast amounts of General Traffic is to be diverted off the proposed corridors.

We pose the question: How will these orbital routes function?

- Two of our local orbital routes are also bus routes – the 18 (S2) and the 17 (S4).

Yet both of these routes are set to become the *only* option open to general traffic and delivery vans etc.

- How then do we get to our places of work?

Not everyone works in the city centre.

- Dublin 6W and Dublin 12 is an area with many self-employed business people.

They need to use commercial vehicles in order to carry out their work.

- As long ago as 2001 it was concluded that a vastly excessive number of buses were needed to serve this area.
- All of the above point firmly to the fact that an underground system is utterly essential to the future transport needs of this area of Dublin. It remains the *only* area of the city without rail transport. This in turn would free up buses to provide much needed local transport both to and from the Metro and suburb to suburb.

11.0: “IMBALANCE RELATING TO THE COMMON GOOD” THE NEED FOR CONSIDERATION FOR ALL:

11.1 We perceive *many difficulties* for our area, in relation to the current proposals put forward by the NTA. These proposals take into consideration the needs of 13.6% of the population of Dublin (public transport), whilst seemingly ignoring the needs of 50.4% (general traffic). Car/van journeys are essential for myriad reasons and therefore need to be taken into account. The current plans, by dint of these proposals, discriminate against our need within this area for those car/van journeys.

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

- The *only means of Public Transport* available to South West Dublin is buses.

We question the ability of Buses to be able to meet existing demand *and* the growth requirement.

We are also aware that, according to the Transport Strategy for the Greater Dublin Area 2022-2042, car usage is only set to diminish by 1.5 % in the Greater Dublin Area by 2042.

11.3 We refer to some commuting statistics from the 2016 Census which are the latest figures available to us and are therefore still relevant:

On Foot 13.2%

Bicycle 7.6%

Motor Bike 0.8%

Not stated 6.4%

Train, Dart, Luas 7.9%

Bus 13.6%

Motor Car Drivers 44.6%

Motor Car Passengers 2.7%

Lorry/Van 3.1%

11.4 Road Space (cars/Lorry/Van) needed by = 50.4% of commuters.

We note that in Chapter 21 (EIAR) Volume 2 of 4 Main Report at 21.3.2.1 Traffic and Transport – Para 4 estimates a marginally higher figure of a 2% decrease in general traffic at peak hour for people travelling within a 500m catchment area of the Core Bus Corridor schemes (including City Centre).

11.5 We believe that *the imbalance* in relation to The Common Good is particularly high in the sector of the city shown in Fig..8.0 The Recorders Residents Association's area falls in the centre of this triangle.

- Under *BusConnects*, the projected increase in the number of buses going into the city in the peak morning hour is very small.
- Rail Transport is non-existent.

- Not everyone can cycle or walk.

With no other option available to us Car dependency will remain high.

- The road closures and the vast number of restrictions locally are heavily weighted against the motorist who make up over 50% according to the figures above.

11.6 Therefore this Planning Application does not address the Common Good of the motorists of this area. In fact it does precisely the opposite.

- This Planning Application should only be made *when options exist* to take Public Transport instead of using your car

We would truly like to be 100% behind the BusConnects Proposals, however, *for this area* that option falls very far short of what is actually needed to make a difference.

11.7 However, one option that stares us in the face is to look properly at providing underground. We are convinced that a 'clean' system running underground, would well exceed any negative expectations of passenger demand.

- A re-visit by an independent, un-biased body on the Feasibility of extending MetroLink from St. Stephens Green to Tallaght, needs to be carried out immediately with a view to providing the greatly needed rail transport for this section of the city.
- With a marginal reduction of 2%, from cars it is clear that BusConnects cannot fulfil this need.

Above all

- Travel equality for everyone must be considered. The motorist, particularly the elderly motorist, those with mobility issues and those who are ill cannot be ignored.
- Until such time as there is an option to use public transport our right to the common good must be considered.

12.00 INCREASED DISTANCE BETWEEN BUS STOPS.

For the following reasons we object to the current plan to increase the distance between bus stops and the removal of existing stops

12.1 The 'F' Corridor, at several locations is to lose existing bus stops.

It would appear that the **methodology** behind this is - bus *journey-time* saving. It is abundantly clear that this BusConnects system is not for the good of the General Population. It may suit the youthful.

For the elderly, increased distances between bus stops will involve longer walks, and thus hardship.

Ireland has one of the largest aging populations. Minister Ryan recently answered a question relating to the disproportionate effect on the elderly by saying that footpaths at bus stops will be higher and bus platforms can be lowered...point entirely missed...unless the footpaths are to be fitted with travellers, this aspect of BusConnects' Corridors will present problems. Not only to the elderly but, also to our young people with mobility issues, those battling illness and those who may be pregnant.

Bus-stop points evolved because it was where people were gathered together or, needed to be picked up from, to save having to walk. The words Bus '*Service*' is the key word here.

Unfortunately it would appear, that lengthened distances between stops and removal of stops suggest that speed of progress of the bus is the NTA's priority, **not** the needs of the passengers.

Point in question:

12.2 There is to be no outbound bus-stop at Garda Station in Rathmines: Inconvenient for those who shop in Rathmines upper, particularly the elderly, as they have a long trudge uphill to the Rathgar Road carrying shopping bags! It is also inconvenient for those making a transfer from the 18 (S2) Route.

Everywhere along the 9, 10, 11 and 12 corridors the same problem exists. As local people we use all of these corridors, perhaps not on a daily basis, but suffice to say - frequently. More thought needs to go into this aspect. We reiterate that the words '*Bus Service*' should be the key word here and the key action undertaken by NTA.

12.3 With age comes diminished ability to walk and cycle. Bus stops further apart do nothing to support this cohort of our citizens.

13.0 IMPERATIVE FOR AN BORD PLEANÁLA TO CONSIDER ALL THREE CORRIDORS TOGETHER.

13.1 We feel that *it is imperative* for An Bord Pleanála to consider *all three corridors* together. *Accurate predictions* for the increase in general traffic *on all roads* bounding each of the three corridors need to be published.

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

13.3 *Given the scant increase in buses across the three corridor one can easily see that the increase in bus usage will simply not be enough to remove a sufficient number of car journeys.*

13.4 When we study the cumulative proposed road closures 24/7, 15 hour a day closures, 8 hour a day closures, and No Right Turn bans, it appears to us that this is a gross infringement of our Civil Liberties for virtually no gain in transfer to bus nor any benefit to speed of journeys: .

13.5 *The NTA aspirations for speed will not make a significant difference as shown in Chapter 6: Traffic and Transport, Time Saving graph.*

Corridor	2028 mins	2043 mins	page
Templeogue in	1.6	0.7	125
out	1.6	0.8	131

14.00 CARBON EMISSIONS INCREASED.

- We expect carbon emission increases *on each and every one of the roads discussed within our comments.*

Every road within this 3 to 4 mile 'square' within the corridors 9, 10, 11 and 12 will have hugely increased queuing, with the resultant extra carbon emissions and negative health implications.

More fuel/electricity will need to be purchased to cover the extra mileage that will result from all the road closures and diversions.

This will be contrary to the Carbon Emissions Reduction Policy by Government.

IN CONCLUSION.

15.1 The amount of in-fill development that has, and is still happening in the area served by corridors 9, 10, 11 and 12, is vast – Mt. Argus, Greyhound Stadium, St. Clare's, Kimmage Manor, Pius X, St. Pauls, Columba's, Cosgrove Estate. The list is endless.

- The current proposals would need to at least double bus *usage* to make a real difference.
- *In order to provide sufficient buses to carry double the number of passengers we would end up with Public Transport Congestion!*

15.2 We have major concerns for our futures living on Whitehall Road due to the backlash of the restrictions, which, in order to make the corridors work, seem to be the 'be-all and end-all' as far as the NTA is concerned.

- Corridors are being looked at in isolation. *This is wrong.*

15.3 We *want* to see Climate Action being taken. We *want* to see bus usage greatly improve. But as citizens we also have a democratic right to be able to move around our city in a reasonable way. We don't just pass through here, others do – *we live here*. Three minutes knocked off a bus journey for the sake of the destruction of, not only our environment, but also **the quality of our lives** is highly questionable.

15.4 Advice was given re writing our submission – Don't get emotional. We disregard this advice because every journey one takes in a day gives rise to emotion, exhilaration, frustration, anger, pleasure in those we meet up with.....

15.5 There may be a need for some bus-gates in the early morning rush hour in one direction but living in the area tells you there is no need for them *throughout the day*, *throughout the night* or, *throughout school holiday time*. Cracking a nut with a sledge-hammer springs to mind

15.6 We have great reservations about the computer modelling system's ability to calculate, with any sort of accuracy, the effect that the concentration of *so many* road closures, right turn bans, diversions, slip road closures, reduction in lanes approaching roundabouts, deletion of roundabouts to signal control etc., will have on our relatively small area. Frustration and anger the two emotions that spring to mind in this instance.

15.7 *But now it's time to face reality - We are well past the point where we need a Metro in this area.* As a leading member of the Metro South West Group my in-depth studies of the transport system of Dublin South West have been quite extensive.

15.8 We conclude this submission by asking that the Feasibility Study on the particular area **which we have requested** be carried out and evaluated before the Corridor destruction happens.

15.9 Whilst we await decisions re the Corridors the preparation work for extensions to Metro can be progressed, in readiness for future demand.

16.00 SUGGESTIONS.

16.01 School Buses.

NTA have consistently refused to get productively into this matter – believing it to be a rural matter. We disagree. The evidence is blatant. There are virtually no traffic issues during the school holidays.

Local Link ‘School’ Routes (see below) could be set up, carrying not just children, but parents, teachers and school staff as well. There are many clusters of schools dotted around South Dublin where this could be trialled.

The introduction of even 3 Local Link Routes can make an enormous difference. The evidence is there in Clondalkin and in the Leixlip – Celbridge link. We believe this is the way forward – more connectivity like this from Townland to Townland *around* both the inner and outer suburbs.

Without the need for corridors –

- Immediate **reliability** on existing routes would have the effect of many transfers to buses.
- Immediate introduction of cashless payments on buses.
- Dedicated school buses. These need to be able to carry parents/teachers/SNA’s etc to schools.
- Ensure proper monitoring of existing bus priority.
- We would suggest the evening closure on Lr. Kimmage Road, if deemed absolutely necessary, should be shortened to 4 pm to 7 pm. This would facilitate journeys to Theatre etc., help the night-time economy and would also address the taxi shortage at night.

Yours faithfully,

Pauline Foster.

Chairman.

Recorders Residents Association.

Annex 1.

3 Potential Demand for Public Transport in South West Dublin in 2042

The Modellers' estimate

- 3.1 The NTA carried out an analysis of this in preparation for their *Draft Strategy for the Greater Dublin Area 2022-2042*. Their analysis is contained in the *Strategy Development and Modelling Report*, November 2021.
- 3.2 In the *Modelling Report*, an idealised public transport network was drawn up. In South West Dublin, two of the three main bus corridors – Harold's Cross and Rathmines – were modelled to have a high quality public transport as follows:
- 1-minute frequency
 - Minimum speed of 20km per hour
 - Unlimited capacity.

These characteristics approximate to a system of 'metro on the street'.

Given these characteristics, the following levels of demand in the peak hour, in-bound, were estimated for 2042:

Table 3.1 Peak-hour am demand for public transport in 2042

	Harold's X	Rathmines	Total
Model demand, peak hour, in-bound, that could be supplied (ACR, p.91)	6,600	9,300	15,900

- 3.3 It is worth comparing these estimates of potential demand with actual supply in 2022.

Table 3.2 Peak-hour am supply of public transport in 2022^a

	Harold's X	Rathmines	Total
Actual supply of bus places, peak hour, in-bound	1,280	2,800	4,080

^a Bus timetables collated by MSWG. Under *BusConnects*, Harold's X is earmarked for the 'F' Spine; Rathmines is earmarked for the 'A' Spine

It can be seen that the Modellers' estimates of potential demand are almost four times current supply. The estimates of potential demand are vastly in excess of both current capacity and the capacity of *BusConnects*. Clearly, something more than buses is required.

- 3.4 Nonetheless, these Modellers' estimates of potential demand should have been increased. No account was taken of the opportunities of cycling to a "metro-like" service. MSWG carried out an analysis of a hypothetical continuation of *MetroLink* to south west Dublin. The analysis showed that even two hypothetical metro stations – at Spawell and Dodder Valley Park – would provide great opportunities for commuters to cycle to these stations and complete their journeys by metro. Sixty-three locations were sampled throughout south west Dublin and from all of these, substantial time savings would arise compared to driving to the city or taking the bus. The average gross saving over driving into the city would be 18-19 minutes each morning. Allowing five minutes to transfer between modes, would leave a net saving of 13-14 minutes each morning. The MSWG analysis is replicated in Annex B.
- 3.5 No account was taken of the possible opportunities for people in south west Dublin to drive to a metro station and complete the journey by metro. The MSWG analysis showed that gross time savings would be similar to those achieved by cycling to metro stations at Spawell and Dodder Valley Park.

3.6 No account was taken of the possible opportunities for people living outside south west Dublin to avail of Park and Ride at two hypothetical metro stations at Spawell and Dodder Valley Park. For in-bound motorists on the N81, they would face a choice: continue driving into the city (40 minutes) or park at Spawell and take the metro (15 minutes). Similarly, for many motorists cruising around the M50, using the Park and Ride at Spawell would be very attractive.

3.7 For all of the above reasons, the estimates of potential demand by the modellers were far too low.

How the Modellers should have proceeded from the (corrected) estimate of potential demand for public transport

3.8 Starting from (upwardly corrected) estimates of potential demand, the next step for the modellers should have been to identify alternative ways of meeting *as much as possible* of this potential demand. It may be the case that not all of the potential demand can be met. However, the alternative ways of meeting as much as possible of this demand should have been evaluated to identify the most cost-effective option. This did not happen.

What the Modellers actually did

3.9 The Modellers did something else. They operated under the following stricture:

“Objectives are considered achieved in Phase 3 if the lower end of the plausible future demand estimates can be accommodated on the public transport schemes currently in planning, given these schemes must be delivered to meet climate goals to 2030.” (page 89)

3.10 Thus, instead of seeking to serve as much as possible of potential demand for public transport in 2042 in a cost-effective manner, it was decided to reduce potential demand to meet the public transport proposals which had been pre-decided. Why bother with demand modelling, if you have already decided what public transport you are going to supply?

3.11 What had been pre-decided was *BusConnects*. The following few paragraphs follow the inappropriate journey of the Modellers as they sought to compress potential demand to meet the capability *BusConnects* in south west Dublin. If you wish to skip this apparently wasted journey, you can go straight to the outcome in paragraph 3.18.

3.12 The journey started with very high assumptions regarding the capacity of buses. It was assumed that ordinary buses on a *BusConnects* corridor could carry up to 3,500 passengers per direction per hour¹. *BusConnects Plus*, i.e. “bendy buses” were assumed to have a capacity of 5,400 passengers per hour. The Modellers made no distinction between different bus corridors, for example between multi-lane roads and simple roads with room for only one carriageway in each direction. All of the proposed *BusConnects* corridors in South West Dublin have long stretches of the latter type of road and the assumptions of the Modellers have little reality for these roads.

3.13 These assumptions provided targets for the Modellers’ aim: reduce the “*plausible future demand estimates*” to below 3,500 or 5,400 passengers per corridor in the peak hour and *BusConnects* will suffice!

3.14 Armed with these corridor targets, the Modellers’ first step was to reduce potential demand to reflect Covid-19 and the emergence of increased home working and blended working.

Table 3.3 Alternative future demand in 2042 due to trip reductions

	Harold’s X	Rathmines	Total

¹ Compare this to the actual capacity of 2,800 today on a very busy Rathmines Road (see Table 3.2). *BusConnects* is assumed to have 25% more capacity.

Initial Model demand, peak hour, in-bound, that could be supplied (ACR, p.91)	6,600	9,300	15,900
Alternative future demand: Trip Reduction (ACS, page 96)	5,600	7,600	13,200

Both the Harold's Cross and Rathmines corridors were still problematic as potential demand exceeded the upper and lower targets (3,500 – 5,400) to fit within *BusConnects*.

- 3.15 The Modellers' second step was to factor in several demand reductions resulting from an increased uptake of cycling, the application of tolls and parking management. The results were as follows:

Table 3.4 Further demand reductions for 2042

	Harold's X	Rathmines	Total
Initial Model demand, peak hour, in-bound, that could be supplied (p.91)	6,600	9,300	15,900
Step 1: Alternative future demand: Trip Reduction (ACS, page 96)	5,600	7,600	13,200
Step 2: Further reductions (cycling, tolls, traffic management: ACW, p96)	3,800	5,100	8,900

Notice that Step 2 resulted in both Harold's Cross and Rathmines falling within the range 3,500-5,400, between the assumed capacities of ordinary and super buses.

- 3.16 Up to this, the modelling assumption was that a frequent, light rail, on-street type system would be used on these corridors. Step 3 involved moving away from this assumption and looking "*at the impact of reflecting actual service characteristics similar to those envisaged by BusConnects*", i.e. a much lower level of service. The results were as follows:

Table 3.5 Demand reductions in 2042 due to *BusConnects*

	Harold's X	Rathmines	Total
Initial Model demand, peak hour, in-bound, that could be supplied (p.91)	6,600	9,300	15,900
Step 1: Alternative future demand: Trip Reduction (ACS, page 96)	5,600	7,600	13,200
Step 2: Further reductions (more cycling, tolls, traffic management: ACW, p96)	3,800	5,100	8,900
Step 3: Impact of <i>BusConnects</i> , more cycling: (Preferred Strategy ADF: p106)	1,400	2,400	3,800

Step 3 produced the final demand forecasts for Harold's Cross and Rathmines which are shown in the above table.

- 3.17 Remember, the objective of the Modellers was as follows:

"Objectives are considered achieved in Phase 3 if the lower end of the plausible future demand estimates can be accommodated on the public transport schemes currently in planning, given these schemes must be delivered to meet climate goals to 2030." (page 89)

The Modellers took an initial figure for potential demand (15,900) which is far too low (see paragraphs 3.4 – 3.7 above). This was further reduced by 76 per cent to arrive at a 2042 estimate, which “*can be accommodated on the public transport schemes currently in planning*”.

- 3.18 We now compare the results for estimated demand in 2042 from the modelling exercise with today’s actual supply of buses on these corridors.

Table 3.6 Today’s supply of public transport vs modelled demand for 2042

	Harold’s X	Rathmines	Total
Today’s actual supply of bus places, peak hour, in-bound	1,280	2,800	4,080
Modellers’ final demand estimates for 2042 Step 3: Impact of <i>BusConnects</i> , more cycling: (Preferred Strategy ADF: p106)	1,400	2,400	3,800

Clearly, the Modellers have been very successful in ‘reducing’ demand on the corridors. Taking Rathmines and Harold’s together, estimated demand for public transport in 2042 was reduced to a level that is below today’s actual supply of public transport (3,800 in 2042 vs 4,080 today).

What is the sense of that, given that we are trying to increase the patronage of public transport?

Conclusion of Chapter 3

- 3.19 The Modellers’ estimates of the demand for public transport in 2042 make no sense. Unfortunately, the *Strategy Development and Modelling Report*, November 2021, was not just an academic exercise resulting in an article in a specialist journal. Rather, as the title suggests, it fed directly into the very poor provision for public transport, which the *Draft Strategy for The Greater Dublin Area 2022-2042* has proposed for south west Dublin for the next 20 years. This plan consists of *BusConnects*.

Chapter 4 examines the capacity issues of *BusConnects* in South West Dublin.

4 Inadequate Plan for the Supply of Public Transport in South West Dublin to 2042 and Beyond

- 4.1 In 2001, The Dublin Transportation Office published *A Platform for Change*. That Report modelled a ‘bus only’ solution. According to the Report:

“In summary, the analysis of the ‘Comprehensive Bus’ scenario established that buses alone could not address the problem because in many of the main transportation corridors the bus mode cannot provide the necessary capacity to cope with the forecast demand” (page 35).

Notwithstanding this conclusion from many years ago, in recent years the NTA has revived the concept of ‘bus only’ for south west Dublin.

BusConnects

- 4.2 The *Draft Transport Strategy for the Greater Dublin Area 2022-2042* provides a general endorsement of *BusConnects* as though it could be sufficient to meet the public transport needs of south west Dublin for the next 20 years.

According to the NTA,

“The aim of BusConnects Core Bus Corridors is to provide enhanced walking, cycling and bus infrastructure on key access corridors in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along these corridors.”

However, for the next 20 years, the *Draft Strategy for the Greater Dublin Area 2022-2042* takes no account of the lack of adequate capacity of *BusConnects*, which has been clearly demonstrated over the past three years by MSWG (see Annex A) and others.

Capacity of the proposed bus corridors

4.3 According to the *Strategy Development and Modelling Report*, November 2021, the potential demand for public transport in 2042 will be almost four times the current supply in Harold’s Cross and Rathmines. However, according to the Modellers, actual demand for public transport (buses) in 2042 will be lower than current supply. This is broadly consistent with the supply of public transport, which is provided under *BusConnects*.

4.4 Between the Red and Green Luas lines, the National Transport Authority has identified 4 bus corridors. Under *BusConnects*, the projected increase in the number of buses going into the city in the peak morning hour is very small.

4.5 Table 4.1 shows the details:

**Table 4.1 Summary of Four Bus Corridors identified by the NTA:
Number of Buses and Passenger Capacity in-bound to the City
in the 7am to 8am Peak Hour from Specific Locations on the Corridors**

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

4.6 The NTA has asserted, without evidence, that the proposed bus corridors can carry “multiples” of the number of buses set out in the *BusConnects* plan. This is entirely fanciful as the corridors would struggle even to accommodate the planned numbers of buses under *BusConnects*.

4.7 For example, Corridors 10 and 12 (from Tallaght and Rathfarnham) merge at Terenure Road East – currently a very narrow 2 lane stretch of road – see the photo. According to the NTA, this would be the busiest corridor in Dublin².

² *Dublin Area Bus Network Redesign, Revised Proposal, page.96.* October 2019, Jarrett Walker and Associates,



4.8 Under *Busconnects*, buses would turn right from Rathfarnham Road into Terenure Road East. That road would also receive buses and general traffic from Terenure Place, which is right opposite Terenure Road East. Terenure Place would receive buses from Templeogue Road, which would only contain buses and bikes. General traffic which now uses Templeogue Road would be diverted at Templeogue Bridge and Templeville Road to the KCR. There they could go to town via Crumlin (Stannaway and Clogher Roads) or they could turn right and access Terenure via Terenure Road West: no doubt, many motorists would choose this option. In addition to receiving 20 'A' buses in the peak hour, Terenure Road East would be expected to also receive 6 'S4' orbital buses and 4 '81' buses via Terenure Road West, giving a total of 30 buses per hour. This is a bus every 2 minutes, in addition to cars, vans, taxis, bikes etc.

4.9 According to the "My London" website,

"The Victoria Line operates 36 trains per hour at the busiest times, with 100 seconds between trains - making it the most frequent train service in the UK and second most frequent in the world."

Of course, unlike the buses on Terenure Road East, the trains on the Victoria Line do not have to contend with vans, cars, bikes etc. Even so, they manage to dispatch 'only' 36 vehicles in the peak hour.

Currently, Terenure Road East receives 19 in-bound buses in the peak hour and is highly congested in peak periods. To increase the number of buses in the peak hour by over 50 per cent, as proposed in *BusConnects*, – and thereby almost match the throughput of vehicles on the Victoria Line – would be a formidable challenge. The notion, as proposed by the NTA, that even more buses could be accommodated is difficult to comprehend.

Has a 'bus only' solution been examined previously?

4.10 The demonstration above that buses alone cannot provide sufficient capacity for South West Dublin is not a surprise. It simply bears out the prediction of 2001 that

"the bus mode cannot provide the necessary capacity to cope with the forecast demand"³
(page 35).

4.11 The 2001 Report went on to recommend the provision of a metro from Tallaght to the Airport via Kimmage, Harold's X, City Centre and Finglas. It also recommended an orbital metro from Tallaght to Blanchardstown and on to Finglas⁴.

Page 22/26

³ A Platform for Change, Dublin Transport Office, 2001, page 35.

⁴ According to *A Platform for Change*: "METRO is a light rail system that is similar to LUAS except that it is completely segregated throughout its entire length (that is, it has no on-street sections)." Most of the lines for these proposed metros would have been over ground.

- 4.12 The MSWG analysis echoes *A Platform for Change*, and shows that buses alone would not be sufficient to serve the transport needs of South West Dublin.
- 4.13 Further material on the limited capacity of *BusConnects*, including the views of the NTA, is contained in Annex A.

The proposal to consider building two Luas lines in 20 years' time

- 4.14 Having produced no effective proposals for public transport over the next 20 years, the *Draft Strategy for the Greater Dublin Area 2022-2042* proposes two Luas lines for consideration post-2042 as follows:

- City – Harold's Cross – Kimmage – Kilnamanagh and onto Tallaght via Red Luas
- Charlemont⁵ – Terenure – Rathfarnham – Knocklyon – Tallaght.

However, there is a major difficulty with this far-off proposal.

- 4.15 In 2008, the Railway Procurement Agency carried out a feasibility study for a Luas in South West Dublin. The proposed Luas line from Dundrum would have proceeded west via Churchtown and Nutgrove to Willbrook, turning north via Rathfarnham, Terenure and Harold's Cross to Christchurch. The study found that:

- Many streets were too narrow to accommodate a Luas
- There would not be enough passengers to justify it.

- 4.16 More recently, in 2016, in regard to "Corridor E – N81 Settlements – South Tallaght – Rathfarnham – to Dublin City Centre", the current *Transport Strategy for the Greater Dublin Area 2016 to 2035* states:

"As such, a number of options, including Light Rail, have been examined. However, due to the land use constraints in the corridor and owing to the pressure on the existing road network, a Luas line was not deemed feasible." (page 56)

- 4.17 Accordingly, if

- the Railway Procurement Agency found that the streets in South West Dublin were too narrow for one Luas in 2008, and
- the NTA found that the streets were still too narrow in 2016,

These findings were reversed without any evidence. What are the chances that these streets will be wide enough to accommodate two Luases post-2042?

Conclusion of Chapter 4

- 4.18 The capacity limitations of *BusConnects* for South West Dublin became apparent in 2019. The recent musings about the possibility of reconsidering Luas for south west Dublin in 20 years' time have no evidential basis. During the last General Election, held in 2020, politicians from all parties supported the carrying out of a feasibility study of continuing *MetroLink* to South West Dublin. The NTA responded with a *Metro to Knocklyon Feasibility Study, 2021* (Jacobs/NTA).

⁵ It is worth noting that the application for a Railway Order contains no reference to Charlemont's role here.

Annex 2.

Cheeverstown House, represented by Cheeverstown House Employment Support Services on 198 Whitehall Road, supports people with intellectual disabilities living in the south west Dublin area - people that will be affected by proposals for the following Core Bus Corridors: Clondalkin - Tallaght to City Centre, Kimmage to City Centre, Templeogue - Rathfarnham to City Centre. Some people with intellectual disabilities may also have physical disabilities and may have impaired mobility. The proposed changes under the CBC project raise many concerns.

At certain points on the CBC's, pedestrians are required to cross over cycle lanes to get on and off of buses. This is potentially very dangerous for people with reduced mobility. The proposal of 3 lane carriageways plus two cycle lanes creates very wide roads for people who may be slower and therefore at greater risk to safely cross at a pedestrian crossing. Changes to bus stops in some instances mean longer distances for people to walk to the nearest bus stop, which may be too much for people with reduced mobility. It is likely that a number of disabled parking places will be lost along the CBC's, which may mean greater distances for people to walk.

Many people with disabilities have spent hours, weeks, months and even years learning to use buses independently, having being trained by staff. The proposed changes to bus services, numbers and routes will cause considerable anxiety, fear, confusion and disruption for people with disabilities. It may again take hours, weeks, months and even years for people to adjust to the changes and learn the new routes. Considerable public money will be spent on this re-training (staff salaries). Loss of direct bus routes could create barriers to employment and isolate people within their own immediate communities, if they are too fearful to learn new routes particularly, where people are required to use interconnector hubs to take two to three buses

ANNEX 3. LOCAL STATISTICS.

In 2015 Recorders Residents Association wrote the following in a submission regarding our bus service/Public Transport:

What was written in 2015 is in black ink.

What is written in red is the projection for BusConnects, and was written in red and formed part of our submission re the Draft Transport Strategy for the Greater Dublin Area in January 2022.

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

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

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

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

Draft Transport Strategy/BusConnects: 2 bus journey. Increase in journey time to this destination which will now be via Rathgar. Nutgrove Shopping Centre now a second, twice hourly, bus – accessed on Terenure Road West.

Ashleaf - walk and carry - No direct bus service.

Draft Transport Strategy/BusConnects: no difference made to this destination.

Rathfarnham/Tesco - No direct bus service.

Draft Transport Strategy/BusConnects: no difference made to this destination.

Sundrive/Superquinn - No direct bus service.

Draft Transport Strategy/BusConnects. Direct bus service – long walk from bus stop to SC for the elderly.

Lidl Greenhills Road - No direct bus service.

Draft Transport Strategy/Bus Connects: no difference made to this destination.

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

Draft Transport Strategy/BusConnects: no difference made to these destinations.

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

Draft Transport Strategy/BusConnects: Direct Access maintained via 81 bus.

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

Tallaght Hospital.

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

St. James Hospital.

Draft Transport Strategy/BusConnects: No difference. F2 with a dangerous transfer to S2 corridor at Sundrive Cross Roads. = Length walks for elderly or infirm.

National Childrens Hospital Crumlin.

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

St. Vincents .

Draft Transport Strategy/BusConnects: *No difference = at least 3 bus changes..*

Temple Street

Draft Transport Strategy/BusConnects: *No difference.*

All 3 Maternity Hosps.

Draft Transport Strategy/BusConnects: *Rotunda and Holles Street now on direct bus route.*

CAVEAT: *City Centre Route unpublished on A, D and F Corridors as of application for planning permission in 2022/23.*

Coombe Hopital : 2 buses - remains difficult with several busy road crossings – to a twice hourly service.

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

Draft Transport Strategy/BusConnects: *No Difference.*

VHI Swift Clinic Dundrum.

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

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

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

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

Draft Transport Strategy/BusConnects: *No difference.*

Bishop Shanahan/Galvin. St. Mac Dara.

Draft Transport Strategy/BusConnects: *Now served by direct bus route.*

Extra-Curricular Activities at Local Schools:

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

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

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

Draft Transport Strategy/BusConnects: *No difference.*

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

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

Now Served: *Rathmines College of Further Education. –*

- *Direct Access Lost 1st & 2nd Round BusConnects and restored in final round (3).*
- *Now served: Atlas Language School*
- *Direct Accerss Lost and by Draft Transport Strategy restored.*
- *UCD - long walk/lift to 17. Dunlaoghaire College of Art and Design - a nightmare journey which takes up to 2hrs travel time each way.*
- *Draft Transport Strategy /BusConnects - Difference is - it will involve 2/3 buses and take longer.*

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

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