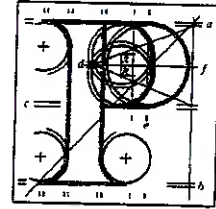


Our Case Number: ABP-317660-23



An
Bord
Pleanála

Linda Patton
6 Rathdown Court
Terenure
Dublin 6W
D6WH210

Date: 06 September 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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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902

To: An Bord Pleanála

Re: Kimmage to City Centre Core Bus Corridor Scheme

Reference: HA29N.317660

Deadline: 26th September 2023

From: Linda Patton, 6 Rathdown Court, Terenure, Dublin 6W, D6W H210

Date: 29th August 2023

Summary of key points in submission

- I am opposed to the project in its current format.
- This proposed project, when considered in combination with the proposed Templeogue/Rathfarnham Bus Corridor project, and to some extent the Tallaght/Clondalkin to City Centre Core Bus Corridor Scheme, will negatively impact on village communities, in particular around the Terenure and Kimmage area, and this has not been adequately assessed. Furthermore, details of the Kimmage project were not sent to An Bord Pleanála at the same time as the Templeogue/Rathfarnham scheme, and were only available from the 27th of July leaving people a relatively short time to consider the cumulative impact. The deadlines for the two applications only overlapped because the Templeogue/Rathfarnham scheme had its deadline extended from the 20th of June to the 15th of August. This meant that people who submitted comments on the Templeogue/Rathfarnham scheme earlier than the 27th of July had no chance to comment on the in combination impact.
- There will be a significant negative impact on local village communities and their local businesses. To reduce this impact any restrictions such as bus gates and restricted turns should be removed, or restricted to peak times only (07:00-10:00 and 16:00-19:00 Monday to Friday), and should not be in place 24 hours a day 7 days a week. The bus gate on Templeogue Road is proposed to operate 06:00 – 20:00, 7 days a week.
- The bus gates on Kimmage Road were previously proposed to operate 24/7 and are now, as outlined in the NTS, proposed to operate at peak times, but peak times have not been defined in the NTS. However in chapter 10 it is stated the times will be: On R817 Kimmage Road Lower, just north of the Ravensdale Park Junction – operating 6am to 10am and 4pm to 8pm, 7 days a week in both directions; On R817 Kimmage Road Lower, just south of Harold's Cross Park – operating 24-hour / 7 days a week; On R817 Kimmage Road Lower, at the northern end of Harold's Cross Park – operating in the northbound direction 6am to 10am; and On R137 at Harold's Cross Road and Kenilworth Park junction – operating 24-hour / 7 days a week. I am of the opinion that this will have a significant negative impact on local residents when considered in combination with the Templeogue/Rathfarnham scheme. There seems to be no evidence that these restrictions need to be at weekends.
- My concern is the cumulative impact on village communities with regard to amenity and accessibility during operation and this does not appear to have been adequately

addressed. In Chapter 10 (10.4.4.1.2.2 Accessibility) with regard to the operation stage for car users, it is stated that “*Negative, Slight and Long-term effects on changes in access to community receptors, as a result of the redistribution of traffic in the surrounding network, are likely to be experienced in community areas situated away from the Proposed Scheme, namely Kimmage Manor, Templeogue, Terenure, Rathgar, Clogher Road, Donore Avenue, Whitefriar Street and Meath Street and Merchants Quay.*” However it is my view that the impact on accessibility for car users in the Kimmage and Terenure areas will be significant when considered in combination with the Templeogue/Rathfarnham scheme.

- The NTS and maps differ in that the NTS states there will be a bus gate at the junction of Kenilworth Park and Harolds Cross Road, while the maps indicate it on one side of the road only on Kenilworth Square North, this needs to be clarified.
- As the proposal stands, residents and others making journeys which cannot be done by public transport, will spend more time driving around circuitous routes which is not environmentally friendly. It is likely to also result in more traffic, including HGVs and commercial traffic, travelling through residential areas.
- The bus connects project was carried out before the pandemic and under the Transport Strategy for the Greater Dublin Area 2016-2035. This strategy has since been amended and now covers the years 2022-2042. Since the pandemic many people now work from home. It seems likely that in future a sizeable proportion of these people will continue to work from home and that virtual meetings will be held rather than travelling. Therefore new traffic modelling needs to be carried out. In particular integrated modelling needs to be carried out taking into account the in combination effects of all the 12 bus corridor scheme routes. The bus connects programme should therefore be paused until the future demand for public transport and the full impact on traffic of all the proposed routes is clearer. Such modelling should include outside rush hours and at weekends. The current modelling is based on incomplete data.
- There is an issue surrounding the timing and deadline of the last round of public consultation in the midst of a pandemic, and the use of online consultation only. It is unlikely that the last consultation fulfils the obligations of the Aarhus Convention.
- This application is very large and requires a lot of effort to see the implications for residents. It is unfortunate that each of the 12 corridors has been submitted as a separate project as members of the public are unlikely to want to read through all the paperwork and pay to make more than one submission despite the fact that more than one corridor is likely to impact on them.
- The EIA should assess the impacts of all 12 routes and any proposed park and rides as one project, so it cannot be construed as project splitting. The impacts assessed cumulatively should include impacts on communities such as Terenure village and also on nature conservation, particularly on the loss of trees and the impact on bat species. The situation, where 4 different consultancy companies each worked on a number of routes, was not ideal to allow in combination effects between the different routes to be easily identified.
- Chapter 21 of the EIAR has not considered projects by Eirgrid such as the powering up Dublin project. See <https://www.eirgridgroup.com/the-grid/projects/dublin/Powering-Up-Dublin-brochure.pdf> which has the potential for cumulative impact at construction stage.

- The feasibility of extending the proposed Dublin Airport underground metro to the southwest of the city should be considered.

Impacts on residents in Terenure

I am retired and live in Rathdown Court off Corrib Road in Terenure. I travel most often within the south and west of the city. As a resident of Terenure I find the area has many services within a short distance. There has been no attempt made to research the routes used by local residents in Terenure when going about their lives. Therefore I list the journeys I make, and the roads impacted that will affect me, as examples of the impact on a resident of Terenure.

Journeys

Public parks and other places to walk- St. Enda's, Bushy Park, Tymon Park, Palmerston Park, The Dodder Linear Parks, Phoenix Park, Powerscourt and Dun Laoghaire Pier.

Filling stations - Kimmage Road Lower or Fortfield Road.

Post Office - Kimmage Road Lower.

An Post sorting office on Fortfield Road (to collect parcels).

Hennessy Glass on Lower Kimmage Road.

Mount Argus Church and Parish Centre

Builders suppliers - Woodworkers on Mount Tallant Avenue, KCR building supplies in Kimmage, and Siopa Linn adjacent to the entrance to Mount Jerome Cemetery.

Supermarkets - Dunnes Stores Kilnamanagh (weekly), Dunnes Stores in Ashleaf and Rathmincs, Tesco in Terenure, Tesco on Lower Kimmage Road, Supervalu in Rathgar, Lidl and Aldi in Terenure.

Shopping centres - Nutgrove (particularly for specsavers, dealz and book station), Rathfarnham Shopping Centre (particularly for Cleggs), Dundrum Shopping Centre (to attend GP), Stillorgan shopping Centre (for connect hearing) and The Swan Centre (including for the cinema, the jewellers to get watch batteries replaced, and the Hopsack).

Laser computers in Windy Arbour.

Kenilworth Electrical on Harolds Cross Road (for spare parts for appliances).

Hardware and tools - B&Q Tallaght, Woodies Tallaght.

From Greenhills Road – T C Matthews Carpets, Chadwicks, Power City, NCT Test Centre and Ballymount Civic Amenity Centre

Garden centres - Newlands Cross Garden Centre, Johnstown Garden Centre off the Naas Road, Grange Growers Kilternan and Powerscourt Garden Pavillion.

Car servicing - Mooneys on Long Mile Road

Car body repair - Auto Restorers and repairs on Rathgar Avenue

Car parts - Rathgar Motor Factors on Rathgar Avenue.

Day classes - Evergreen Centre on Terenure Road North

Gym – Ben Dunne Gym Kimmage

Mount Jerome Cemetery

Medical services – GP in Dundrum, Physiotherapist and chiropract in Greenlea road, Physiotherapists in Sandyford, in St. Michaels Dun Laoghaire, and in Wellington Road Dublin 4, Dentist in Rathmines, Opticians in Nutgrove, Hearing test in Stillorgan, Consultants in St. Vincents, St. James, Mater, Blackrock Clinic, St Michaels Dun Laoghaire, Royal Victoria Eye and Ear Hospital, Institute of Dermatologists in Herbert Place, The Beacon, and The Hermitage.

Roads impacted

The roads that I use that will be impacted by this proposed scheme in combination with the Tallaght/Clondalkin to City Centre Core Bus Corridor Scheme and the proposed Templeogue/Rathfarnham scheme are listed below.

I use Kimmage Road Lower to access Kimmage Road West to get to Tallaght and the Naas Road and Tymon Park. I use this road at least once a week. It is proposed in the Kimmage Scheme that Kimmage Road Lower will have bus gates on it, and while residents living off Kimmage Road Lower will be able to access the road they will be unable to travel the whole length of it due to the bus gates. The alternative route is to go via Terenure Cross Roads to access Terenure Road West. Terenure cross roads is very busy and on the return journey from Terenure Road West to Terenure cross roads I find that even in light traffic the lights have to go green twice at the junction with Templeogue Road before I can get to the Terenure cross roads junction because of the way the traffic lights work.

I also use Kimmage Road Lower to access, Siopa Linn hardware and Mount Jerome Cemetery. The proposed bus gates as part of the Kimmage scheme will mean I will be unable to access these places via Kimmage Road Lower. Therefore I will need to access them via a small road off Harolds Cross Road beside the park. Given the volume of traffic to Mount Jerome Cemetery this will be problematical. This will also become the only access to a large amount of housing on Mount Argus Road. I also use Lower Kimmage Road to get to Mount Argus Parish centre, the sorting office on Fortfield Road and to Greenlea Clinic on Greenlea Road for physiotherapy and chiropody. If I can't get to Greenlea via Kimmage Road then the alternative is to go via Terenure Road North and turn at Terenure cross into Terenure Road West and turning left into Greenlea Road. It will no longer be possible to access Greenlea road by turning right off Fortfield Road.

Sundrive Road will become busier due to proposed bus gates on Kimmage Road Lower and this may become an alternative route to access Kimmage Road West via smaller residential roads. However this would not be a suitable route for HGVs and commercial vehicles delivering to the local businesses. I use Sundrive Road en route to Phoenix Park where I am a member of a Nordic Walking Club that meets there three times a week. I also use Sundrive

Road if I have to visit St. James's hospital. More traffic will be routed along Sundrive Road, which will make traffic heavier and journeys slower, resulting in more emissions.

A section of road between Kenilworth Square and the five-way junction at Kenilworth will have a bus gate operating west between hours not specified in this application. Traffic will have to divert via Kenilworth Square West and Rathgar Avenue. Rathgar Avenue will become busier and is the main way for me to access Orwell Road because there is no right turn from Rathgar onto Orwell Road. Rathgar Avenue is already a very busy narrow road and the traffic lights are slow at the Rathgar junction resulting in tailbacks. This may make it harder to access the businesses on this road.

I use Rathfarnham Road to access Bushy Park, St. Edna's Park, Nutgrove Shopping Centre and Enniskerry. The Templeogue/Rathfarnham bus corridor proposes routing more traffic onto Rathfarnham Road via Springfield Road in order to access Terenure Cross Roads. The area around the Rathfarnham Shopping centre and Rathfarnham Road are already very busy. Traffic will be unable to travel towards Rathgar from the Terenure cross roads and will have to travel down Harolds Cross which is already very busy.

I also use Templeogue Road to access the M50 and Bushy Park. Under the Rathfarnham/Templeogue scheme there is now going to be a bus gate for north bound traffic and restrictions on accessing Rathdown Park and Rathdown Avenue. It is unclear how local residents wishing to access parking for Bushy Park for exercise will be impacted.

I use Terenure Road East and Rathgar Road to access Rathgar and Rathmines. I use Rathmines Road Lower to go to and from the city centre. The proposals under the Templeogue/Rathfarnham scheme for Rathgar Road and Rathmines Road Lower will impact on my access to Rathgar and Rathmines and the city centre.

I also use Terenure Road East to access Highfield Road very regularly from where I go to the Dodder walks at Clonskeagh, to my GP in the Dundrum Centre, to Dun Laoghaire, to Blackrock Clinic, to Sandyford for Physiotherapy and to the Beacon Hospital. Highfield road is already very busy, so much so that I only use it in one direction, away from Rathgar as it is very difficult the other direction due to the volume of traffic. Putting more traffic onto Highfield Road as envisaged with the Templeogue/Rathfarnham scheme will exacerbate the current problem.

I use Castlewood Avenue regularly to access Ranelagh en route to my physiotherapist on Wellington Road. The current proposals for the Rathfarnham/Templeogue scheme direct inbound traffic down Castlewood Avenue as Rathmines will become one way for cars coming out of the city. Castlewood Avenue is already very heavily used by cars and is likely to entail more tailbacks and make access to the car park in the Swan centre more difficult. There will also be a no right turn when I reach Ranelagh so I will have to turn left heading towards the city and work my way back towards Wellington Road.

On Terenure Road East, between St Joseph's church and the Rathgar Avenue junction there is no room for a cycle lane, so it is proposed under the Templeogue/Rathfarnham scheme that cyclists will go along Terenure Road North and Harolds Cross Road. It is unclear how this will impact on that piece of road. I understand that there will be no buses on Harolds Cross Road and that the bus stops shown on maps are for existing bus routes. This is very confusing as this road currently has a bus service.

In addition, if there are cycle lanes on Terenure Road North and Harolds Cross Road it is unclear how on street parking and areas for delivery to local businesses will be impacted. This needs to be clarified. As stated above it is unclear if any assessment on the local businesses has been carried out. Should such businesses become unviable and close down then local residents will have to travel further, which goes against the sustainability of keeping journeys local.

The Tallaght/ Clondalkin scheme proposes major changes to Greenhills Road, which is a road I frequently travel along to access Dunnes Stores in Kilnarnagh, and shops in the Tallaght area and to access the Ballymount Civic Amenity site. I also use Greenhills Road to access Power City, Chadwicks, T C Matthews, the NCT test centre and the Ballymount recycling facility, and to get to shops along Belgard road such as B&Q. There are also proposed changes to the Walkinstown roundabout and Walkinstown Avenue. I use the Walkinstown roundabout and Walkinstown Avenue to access Mooneys Hyundai to get my car serviced. Sadly the Hyundai dealer in Rathgar closed so I have to travel further.

Issues

While I support the idea of a better public transport system, I am opposed to these proposals in their current format. While a reliable public transport system is essential there is also the matter of communities living in villages that the routes go through. There appears to have been little consideration of the very significant impacts on local businesses and residents.

The application is very large and requires a lot of effort to see the implications for residents. It was very useful therefore that Senator Mary Seery Kearney and Councillors Anne Feeney and James Geoghegan produced some explanatory leaflets at a public meeting, detailing the impacts of the Templeogue/Rathfarnham scheme on Kimmage, Ranelagh, Rathgar, Rathmines, Templeogue and Terenure. This public meeting also outlined proposals for Kimmage which had not then gone to An Bord Pleanála.

It is unfortunate that each of the 12 corridors have been submitted as a separate project as members of the public are unlikely to want read multiple complex applications or to pay to make more than one submission despite the fact that more than one corridor is likely to impact on them.

This proposed project, when considered in combination with the proposed Templeogue/Rathfarnham Bus Corridor project, and to some extent the Tallaght/Clondalkin to City Centre Core Bus Corridor Scheme, will negatively impact on village communities, in particular around the Terenure and Kimmage area, and this has not been adequately assessed. Furthermore, details of the Kimmage project were not sent to An Bord Pleanála at the same time as the Templeogue/Rathfarnham scheme, and were only available from the 27th of July leaving people a relatively short time to consider the cumulative impact. The deadlines for the two applications only overlapped because the Templeogue/Rathfarnham scheme had its deadline extended from the 20th of June to the 15th of August. This meant that people who submitted comments on the Templeogue/Rathfarnham scheme earlier than the 27th of July had no chance to comment on the in combination impact.

The whole idea of bus connects seems to be aimed at dealing with rush hour traffic. Rush hour traffic consists of people coming and going to work and schools. The proposed bus routes however take no account of the many residents whose lives will continue outside of rush hour, and who will be adversely impacted by proposals such as bus gates, one way streets, loss of access to streets, loss of certain bus routes, loss of cross city (north to south) buses, extra traffic on certain roads, and restrictions on car parking on roads, when going about their normal business outside of rush hour and at weekends.

It is unrealistic to think that a person will be able to carry their weekly grocery shop, or heavy cans of paint and other hardware objects, on a bicycle or bus, or indeed to be able to make all their medical and other journeys by public transport. Therefore residents will still need to make car journeys. Should local businesses become less viable as a result of these proposals what measures have been put in place to support them? If certain businesses close then residents will have to travel further which goes against the notion of shop local and sustainability. Surely the emphasis should be on maintaining village communities close to the city with their services?

In order to maintain communities and their businesses, bus gates and restrictions on turns into residential streets should be removed or operate at peak times only (7.00-10.00 and 16.00-19.00 Monday to Friday) to allow residents free movement outside of rush hour. At present certain bus lanes in the city centre do not operate 24 hours a day 7 days a week and it is unclear why this approach cannot be adopted everywhere.

The bus gate on Templeogue Road is proposed to operate 06:00 – 20:00, 7 days a week. The bus gates on Kimmage Road were previously proposed to operate 24/7 and are now, as outlined in the NTS, proposed to operate at peak times but this has not been defined in the NTS. However in chapter 10 it is stated the times will be: On R817 Kimmage Road Lower, just north of the Ravensdale Park Junction – operating 6am to 10am and 4pm to 8pm, 7 days a week in both directions; On R817 Kimmage Road Lower, just south of Harold's Cross Park – operating 24-hour / 7 days a week; On R817 Kimmage Road Lower, at the northern end of Harold's Cross Park – operating in the northbound direction 6am to 10am; and On R137 at Harold's Cross Road and Kenilworth Park junction – operating 24-hour / 7 days a week. There seems to be no reason why this should operate on weekends. This will have a significant negative impact on local residents in cars when considered in combination with the Templeogue/Rathfarnham scheme. Restrictions on local roads and bus gates should be removed or be at peak times only Monday to Friday to minimise impacts on local residents and businesses. There seems to be no evidence for bus gates at weekends.

The NTS and maps differ in that the NTS states there will be a bus gate at the junction of Kenilworth Park and Harolds Cross Road, while the maps indicate it on one side of the road only on Kenilworth Square North, this needs to be clarified.

My concern is the cumulative impact on village communities with regard to amenity and accessibility during operation and this does not appear to have been adequately addressed. In Chapter 10 (10.4.4.1.2.2 Accessibility) with regard to the operation stage for car users, it is stated that "*Negative, Slight and Long-term effects on changes in access to community receptors, as a result of the redistribution of traffic in the surrounding network, are likely to be experienced in community areas situated away from the Proposed Scheme, namely Kimmage Manor, Templeogue, Terenure, Rathgar, Clogher Road, Donore Avenue,*

Whitefriar Street and Meath Street and Merchants Quay.” However it is my view that the impact on accessibility for car users in the Kimmage and Terenure areas will be significant when considered in combination with the Templeogue/Rathfarnham scheme.

There will also be additional traffic impacts from other proposed routes.

While some traffic analysis has been carried out there seems to have been no attempt to establish the normal movements of residents outside of rush hour or at weekends.

While I don't support the bus connects proposal in its current format, as a person who used to cycle regularly, and currently walks regularly, I do however support the idea of having cycle lanes segregated from traffic and from pedestrians along the main routes. I don't however support the idea of re-directing cyclists away from main routes onto residential streets because quantities of speeding cyclists pose a safety hazard to residents. While walking I frequently find cyclists, including electric bicycles, and electric scooters, travelling on footpaths which poses a danger to pedestrians. Pedestrians should have the right to walk on footpaths without fear of danger from bicycles or electric scooters.

The bus connects project was carried out before the pandemic and under the Transport Strategy for the Greater Dublin Area 2016-2035. This strategy has since been amended and now covers the years 2022-2042. Since the pandemic many people now work from home. It seems likely that in future a sizeable proportion of these people will continue to work from home and that virtual meetings will be held rather than travelling. Therefore new traffic modelling needs to be carried out. In particular integrated modelling needs to be carried out taking into account the in combination effects of all the 12 bus corridor scheme routes. The bus connects programme should therefore be paused until the future demand for public transport and the full impact on traffic of all the proposed routes is clearer. Such modelling should include outside rush hours and at weekends.

There is also an issue surrounding the timing and deadline of the current round of public consultation in the midst of a pandemic when residents are unable to attend public meetings. It was carried out by online methods only for the general public with call backs to take place, with differing dates on different routes. For example on route 12 call backs were from the 18th of November until the 1st of December, which was two weeks before the deadline for comments, although call backs were happening after the 1st of December. It is unlikely that the use of only online methods, and no means of asking questions after the 1st of December, fulfilled the obligations of the Aarhus Convention. It would have precluded those who were not computer literate or were unable to access a computer, or who heard about it after the 1st of December and could not ask a question.

The original proposal of an underground under Kimmage Road Lower was scrapped a long time ago, it is unclear why this has not been reconsidered. The feasibility of extending the underground metro from Dublin Airport to the west of the city should be carried out.

Restrictions and one way streets will inevitably result in more traffic on other routes and impact on residents that may not have previously been impacted. For example there will be more traffic on Harolds Cross Road, Sundrive Road, Terenure Road West, Larkfield Avenue, Clareville Road, Rathgar Avenue, and Highfield Road.

The traffic modelling does not appear to have been modelled taking account of the in combination/cumulative impact of all 12 routes together, or at all times of the day including weekends. The situation, where 4 different companies each worked on a number of routes, was not ideal to enable the in combination effects between the different routes to be easily identified.

Commuters also come from outside Dublin and mention was previously made of new Park and Ride sites in key locations at the beginning of each preferred route brochure. However no details were provided. The impact of the complete project should be assessed in the EIA by including all 12 routes and the Park and Rides as one project. Should some Park and Rides be intended to be put in place at a later date, and are not therefore assessed as part of the project, then this could be construed as project splitting.

Travel to school appears to contribute to a lot of traffic at rush hour as traffic moves significantly more freely during school holidays. Apart from cycle lanes there seem to be no proposals to address this issue, such as the provision of more school buses.

All the bus routes proposed appear to be aimed at going to the city centre along main routes. None cross the city from north to south, such as the present no. 16 which goes to Dublin airport without the need for changing to another bus.

In addition routes that don't go to the city centre are not mentioned. It is unclear if the bus connects proposal is to replace all existing city bus routes or only some? For example at present one can get to UCD from Terenure using the 17 bus route, and from Kenilworth to the RDS and Sandymount and Palmerstown using the 18 bus. Clarification is needed as to whether these routes will be maintained or not. It is hard to see how it could be faster to have to go into the city centre and out again if these routes are scrapped.

As buses tend to fill up before they reach the city centre it is unclear how easy it will be for residents of places like Rathgar, Terenure, Kimmage and Harolds Cross to get on a bus at peak times. This issue needs to be assessed and addressed.

Some people with mobility issues, and some elderly people, will have problems walking further for a bus where routes are changed. In addition some people may have problems standing for long periods and not all bus stops have seats. More seats need to be provided at bus stops. In addition, if buses are full seats may not be available downstairs and going upstairs would be difficult for some people. The bus corridor schemes should take account of the age friendly strategy for Dublin.

In order to encourage the use of public transport, the public must feel safe. Antisocial behaviour has recently been reported to take place in some buses, particularly in the upstairs section.

Elderly people and people with mobility issues can be vulnerable and feel safer in a car or taxi than on public transport, particularly during hours of darkness. Taxis run all day and night while public transport does not. It seems that booking a taxi no longer guarantees a taxi will arrive and they are therefore no longer as reliable. It should be noted that there are now less taxi ranks in the city centre since the Luas was installed. Adequate taxi ranks and a guaranteed booking service for taxis should be examined as part of any transport system.

With regard to the proposed approach for assessing the project, it is important that the assessment is for the complete project, i.e. all 12 routes and associated park and ride facilities. This assessment should include an assessment on local communities and their associated businesses.

Chapter 21 of the EIAR has not considered projects by Eirgrid such as the powering up Dublin project. See <https://www.eirgridgroup.com/the-grid/projects/dublin/Powering-Up-Dublin-brochure.pdf> which has the potential for cumulative impact at construction stage with the Kimmage and Templeogue/Rathfarnham Bus Connects schemes, particularly Eirgrid's route options J and L.

The cumulative assessment should also consider the impact on nature conservation. In particular the impact on bats which are protected under the Wildlife Acts and Habitats Directive. Many cycle tracks are being routed along rivers and canals with lighting, and trees are being removed. This all results in a loss of habitat and feeding areas for bats. The cumulative impact of bus connects along with greenways needs to be assessed to identify the impact on Dublin's bat population.

In view of the above cumulative/in combination impacts on local communities I would ask that An Bord Pleanála hold an oral hearing.