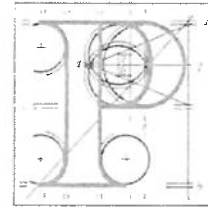


**Our Case Number:** ABP-317660-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Senator Mary Seery Kearney  
26 Templeville Road

**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](mailto: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

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaos Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

# Bus Connects Submission to An Bord Pleanála in respect of the Kimmage to City Centre Core Bus Corridor

**Bord Pleanála Case Reference: HA29N.317660**

**Written By Senator Mary Seery Kearney**

---

Home Address: 26 Templeville Road, D6W RX57

Email: [REDACTED]

Tel: [REDACTED]

This submission is reflective of the views of both myself and a number of residents associations and individuals who have contacted me.

My observations relate to those areas of this corridor that affect the Constituency of Dublin South Central and its immediate surrounds. I write as a public representative and designated Oireachtas Member for Fine Gael for Dublin South Central. I am also a local resident, I live on Templeville Road.

## FLAWED INITIAL PREMISE

The objectives of this planning application as stated by the National Transport Authority must be a central basis by which adjudication of proportionality is measured. The cost of this corridor is significant in terms of the compulsory purchase of land along the route, the build cost and all of the fees including consultancy, design and legal fees. Their stated aim is as follows:

*The aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver **efficient, safe, and integrated sustainable transport movement along the corridor.** The Proposed Scheme is a key measure that delivers on commitments within the National Development Plan (2021-2030), the Transport Strategy for the Greater Dublin Area (2022-2042) the Climate Action Plan (2023) and the National Planning Framework 2040<sup>1</sup>*

The key measures therefore are: efficiency, safety, integration, sustainability.

If we are to break that down into its component parts, it immediately becomes clear that the cost and reduction in quality of life and environmental impact far outweighs any theorised improvements.

---

<sup>1</sup> [www.Kimmagescheme.ie](http://www.Kimmagescheme.ie) home page

The NTA set out that the automatic traffic counts were undertaken from 20<sup>th</sup> November to 3<sup>rd</sup> December 2019. It must be noted that this was prior to covid and any consequential change in work practices, for example working from home, patterns of going to work in the office, etc. The data on which this corridor is relying is considerably out of date and out of sync with the changes in work practices that arose and became the new norm during and since covid.

The NTA, by their own admission state that the roads surrounding the main corridor will have increased volumes of traffic. Despite my reservations on the accuracy and current relevance of the traffic counts taken, much will be indicative of the correlation between those who journey through Kimmage Cross Roads and the Kimmage Road Lower and Sundrive Road junctions. The 2019 data show that 35,085 travel daily through the KCR. At the first junction on Kimmage Road Lower at Ravensdale, 28,364 travel through that, the difference presumably being those who currently turn left into Ravensdale, that being 6721. The figure for the Kimmage Road Lower and Sundrive Road cross roads is higher again, presumably with traffic coming from the residential roads onto Kimmage Road Lower, at 29,474. The creation of a bus gate at the Ravensdale junction on Lower Kimmage Road will mean that the 2019 traffic count will be minus all vehicles except those of public transport vehicles, buses and taxis. I would venture to guess that the number of buses and taxis does not exceed 1000 vehicles per day, meaning that over 25,000 vehicles will be forced into Ravensdale and the roads that it connects to. Narrow Crumlin/Kimmage residential streets built from the 1940s onwards, and never designed for such huge volumes of traffic will now have to content with traffic in the tens of thousands. This is hardly safe or efficient. Every one of those extra vehicles passing through a residential area is a possibility for an accident to happen. They will impact on residents trying to access and exit their homes. It will lead to increases in stationary traffic due to sheer volumes, all affecting the environment and air pollution.

There are also journeys in the opposite direction to town. Many residents travel out of the city towards the centres of business such as CityWest, Robin Hood Industrial Estate and to colleges such as TUD Dublin, Tallaght Campus. Existing and increasing populations will need access to a means of transporting themselves to these centres of education and employment. The corridor plans do not take account of any of these needs and the bus network plans assume people will be willing to change buses not just once or twice but up to three times in order to get to their desired location. The fact is that they won't do that, they will take cars and there will be an increase in car volumes on many of the now proposed more limited arteries to these destinations.

The environmental cost of air pollution must be factored into this equation and there is guaranteed to be an increase in same, thereby defeating the macro reasoning behind these schemes in the first place. The sustainability reasoning simply doesn't exist.

Environmental Impact Assessments should be obliged to consider the accumulative effect of all of the bus corridors, not merely each one in a silo, that is neither accurate nor reasonable.

## Walking

I have often walked to the city centre from Templeogue and vice versa, there is no shortage of well-lit footpaths and safe pedestrian crossings all along the way. There are concerns at a local level regarding the diminution in safety at evening and night time brought by the introduction of LED lighting and the fact that the light spill and consequently light trespass is significantly reduced. While

this is good news for neighbours and lends itself to greater efficiency in light management, the diminution in street lighting has meant that some members of the community will not venture out during the times they are reliant on street lighting – these include lone walkers, women and people with sight impairments who find the LED has seriously curtailed their visibility. Nothing in these plans significantly improves or to be fair reduces walking infrastructure. Therefore, this objective cannot be asserted with regards to this corridor as an improvement.

## Cycling

There is no doubt that the corridor as designed delivers a significant increase in much needed cycle lanes, quiet street treatments and segregated cycling infrastructure. I have recently taken to cycling and am all too personally aware of the need for segregated cycling lanes and this plan delivers significantly in that regard.

However, there are two obvious flaws to the scheme as set out which must be considered against the objectives of the entirety of the scheme as they conflict with the provisions of the National Cycling Manual<sup>2</sup>, a publication of the applicant, the National Transport Authority.

1. The provisions of the manual state:

*The principle of homogeneity is that reducing the relative speed, mass and directional differences of different road users sharing the same space increases safety. This has a beneficial impact on the level and severity of accidents that might otherwise occur. Where the relative speed, mass or direction is not homogenous, different road users may need to be segregated.*

And in addition to that in the context of the needs of cyclists it states: *The cycling network should link all main origin and destination zones / centres for cyclists. A well-targeted cycle network should carry the majority of cycle traffic (in cycle-km terms).*

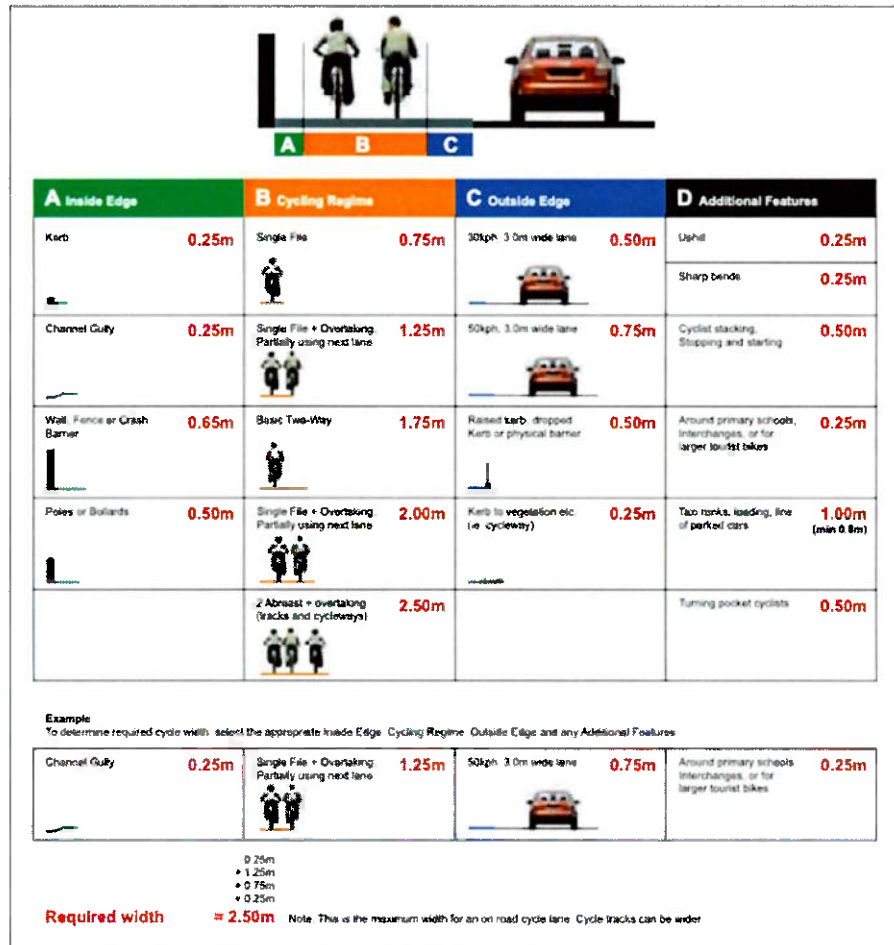
*Cycling routes within the network should be logical and continuous. Delays, detours, gaps or interruptions should be avoided. Markings and signage should be clear and consistent...*

*Continuity of Route: It is illogical to discontinue cycling provision near busy destinations to accommodate or maintain other traffic flow*

The segregated cycling tracks are not continuous along the CBC routes. There are sections of road where segregated cycling lanes cease altogether in order to prioritise bus lanes. This is a very significant flaw that prioritises the minutes shaved off bus journey times (a theorised objective that only impacts during peak traffic travel times, if at all) over the safety of cyclists who are obliged to road share without segregation for significant sections of the road on a 24/7 basis. The balance is completely wrong to prioritise bus routes where the demand fluctuates over cycling where the need is 24/7. The very first road of this route, that of Kimmage Road Lower where the entirety of the road is supposed to be given over to public transport and cycling during peak travel hours, the cycle lane disappears at one point and coincides with the bus stop on other sections of the road.

---

<sup>2</sup> [https://www.nationaltransport.ie/wp-content/uploads/2013/10/national\\_cycle\\_manual\\_1107281.pdf](https://www.nationaltransport.ie/wp-content/uploads/2013/10/national_cycle_manual_1107281.pdf)



- Also of concern is the fact that considerable advertising monies are spent on ensuring that cars leave adequate room for cyclists when passing them out, and rightly so. This becomes a non-issue when you have continuous segregated cycling lanes and lends itself to the fact the urban traffic is going to travel in closer proximity to cyclists, hence the need for segregated cycling as a safe area for cyclists who are the more vulnerable road users. However, the width of cycling lanes as set out in the National Cycling Manual, should be 2 meters to accommodate the space for the cyclist themselves, wobble room, the space to the left of a cyclist that must accommodate gullies and drains and the space to the right of the cyclist that will come into the proximity of other road users. This minimum of 2 meters is not reached throughout whole sections of the proposed cycle tracks. This means that cyclists are obliged to travel less than the recommended space on the road alongside traffic that can quite often be less than mindful of their needs. See figure above.
- The seriousness of supporting the change to cycling needs to be measured when we have a situation where on-street bike storage is more expensive than the cost of a residents parking permit.
- While the introduction of additional cycle routes is to be welcomed, there are significant flaws in it that must be overcome.

- a. I have canvassed the views of the residents in Poddle Park, they are concerned at the sharing of their road with cyclists and want the cyclists to be corralled into a segregated cycling lane and not to have free access to the entire road as is planned under the quiet cycle route shared with local traffic.
- b. Similarly, Mount Argus Close/Court and View will be the site of the new quiet cycle route to be shared with local traffic. The residents there are deeply concerned with this proposed use of their estate. Currently there are two sharp bends in the estate that constitute a traffic safety issue, adding significant cyclist numbers to that is a safety issue for both residents and the cycling public using that route.
- c. Throughout the route there is an absence of designated and segregated cycling lanes leaving cyclists vulnerable on the roadways.

**“... Bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor”**

A key issue with this statement of the NTA objective is that while it may well deliver bus infrastructure along the corridor, the reality of which is disputable, and perhaps it delivers integrated sustainable transport movement along the corridor, it does so at a significant cost to all other transport movement in the peripheral road network surrounding the corridor.

I have never understood why, given that the objective was to change transport modalities, why other measures such as for instance congestion charges, subsidised or free bus services and a proper on street or underground metro system did not have to be disproven as a real alternative before such a costly plan was rolled out. The view that this is the only way to achieve the objective without being obliged to model the collective impact of other measures is shockingly disproportionate. Nowhere is the rationale of choices made set out, at least if they were explained there might be a greater possibility of buy in. Instead, there are no objective comparisons, even the feasibility study of the alternative South West Metro had its terms of reference gerrymandered by the NTA to a point that the outcome of the report was bound to be inadequate. The blatant lack of any engagement on any alternatives is not just maddening but also arguable as to its lawfulness.

It is not just residents in these suburbs who use public transport, people coming to Dublin for matches, music gigs, hospital appointments and a plethora of other reasons also come to Dublin and a significant portion come by car. If the bus infrastructure is envisaged as a 24/7 travelling system, then why are there no plans for park and ride opportunities throughout the entire bus corridor network – there isn't one!! If the bus gates are needed for Sunday traffic then accommodate all Sunday traffic including those who travel to Dublin for events.

There is a huge need for sustainable public transport and I agree that an enormous level of change is needed to achieve it, this application should be about whether this is the right change or the best change to make in order to achieve that objective.

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.”* It is my contention that they will be significantly impacted.

The Kimmage to City Centre Corridor begins with the diversion of traffic from the Lower Kimmage Road into the residential housing estates of Crumlin. Ravensdale Park will become a significant conduit for up to in excess of 20,000 vehicles. Some of these may well turn toward Kimmage Road West and avoid this junction all together, however, many won't and they will turn onto Ravensdale. To then turn towards the city centre, they will be obliged to disperse onto Captains Road, Cashel Road, Clonard Road and Bangor Road. The brunt of the traffic will be taken by Stannaway Road, Kildare Road and Old County Road. What needs to be considered is that this traffic will then encounter the Tallaght Clondalkin to City Centre Core Bus Corridor Scheme that runs along the Crumlin Road. The changes planned here are to have one way streets and effectively cul de sacs at the intersection between Clonard Road and Crumlin Road and Bangor Road and Crumlin Road. This means that a minimum of 20,000 additional cars will be using these roads. Elderly people live there, children live there – the children will have no way of playing out on the streets, elderly people will be left with very long car journeys just to access the shops or post office.

The arrangement for residents of Gandon Close, St Clare's Road and Mount Jerome to access and exit from their homes is farcical. The idea that they must double back on themselves to be able to travel towards town will put additional journeys on them that will accumulate to additional and unnecessary miles over time. For example, if someone from Gandon Close needed to drive to Our Lady's Hospice, they would leave their residence, turn right and drive to the top of Mount Argus Park, turn left across the top of the park and drive down Harold's Cross Road.

Also impacting the area is the Templeogue to City Centre Corridor that will be diverting traffic also into Whitehall Road and then onto the roads through Crumlin. Roads along the Templeogue adjacent spines will be effectively closed to all other traffic between 6am and 8pm seven days per week by the bus gate. While those travelling along this route will only have access outside of peak hours.

There is no effective and accessible traffic modelling of the effect of the confluence of all of these corridors and effective road closures.

It is respectfully submitted that the planners must take into the account the adherence to the objectives of safe transport. Safe transport must be viewed in the context of whether its safety is caused by the creation of issues in safety for others. While a safe bus route and arguably cycle route might be created, it will be at the costs of those who live in the peripheral roads in Kimmage and Crumlin.

### **Flawed Public Consultations**

There is no doubt that some changes have come about due to public consultation and public representative lobbying including my own. However, the applicant states that they engaged in

stakeholder consultations and set out the dates for same. Two of the three public consultation periods took place at the height of the covid pandemic and physical public meetings could not be held. Meetings were held on line and engagement was very strictly controlled. This does not constitute public engagement.

While the period for observations to An Bord Pleanála was extended twice due to typographical errors by the application, the fact of an ability to make an observation must be seriously challenged. The documentation attendant to this application is considerable by any standards. Ordinary citizens are expected to unpack and piece together implications of these changes in order to render themselves able to envisage the impact on their lives and comment on it. It is a completely unsatisfactory and unfit for purpose means of providing for the input of the public.

I acknowledge that you will never get 100% public buy in and that change management is challenging when dealing with the public. The fact that it is challenging is not an excuse for bullying through a scheme, in fact three schemes that disproportionately affect a small area. The NTA have consistently bullied through these changes from a perspective of “we know best”, and the Minister has washed his hands of any calls on him to ensure that it is more democratic – and he is a TD in a large part of this route! The methods deployed by the NTA have been appalling. In many instances their engineers do not know best and their cited stakeholder consultation is deeply flawed and misrepresents the reality on the ground.

Engaged meetings with a collective of representatives Residents Associations all in the same room at the same time would have been effective and constructive. That never happened! The Preliminary Design Report for this corridor cites stakeholder engagement and lists representatives groups – representatives of what? In many instances when requests went in for meetings with Residents Associations, this was rejected and Residents Associations were met on a one to one basis, never as a collective. Consequently, arrangements are included that favour one residents group at the cost of others. Again this cannot possibly constitute adequate stakeholder consultation. I believe that the NTA has left themselves wide open to a challenge under the Aarhus Convention for a failure to properly engage in public consultation.

I have a plethora of emails from bus drivers employed by Dublin Bus and Go Ahead – none of whom were consulted in the course of this process. I have searched the 325 page document Preliminary Design Report for the words “Dublin Bus” and they appear once! That is on page 88 in the context of the discussion on bus stops. Why weren’t bus drivers consulted for their views on how improved travel times might be achieved?

If affected Residents Associations and bus drivers weren’t engaged with in any meaningful way in the course of this process, as two groups who could have given the best insight into how to achieve the objectives, then on what basis was the contributions of the other stakeholders taken on board. Are they not theoretical merely rather than having the lived experience of how things are and how they might be improved? It is scandalous that these two groups were not meaningfully engaged with.

With due respect to An Bord Pleanála, it is very difficult to imagine how you might go about your adjudication on this planned route. This isn’t a planning application for a residential development where the rules of engagement are clear and consent by reference to planning law can be anticipated. The methodology of adjudication should have been published so that the public could know how to



make observations within those criteria. Very little is known about how An Bord Pleanála will go about the review of this planning application. The An Bord Pleanála criteria and methodology should have been published and therefore even this phase of the planning process is deeply flawed. Is every proposal under scrutiny and what will be the rationale for their acceptance or refusal?

Amendments to turns and road markings usually undergo a process within the Local Authority that involve public input, Local Authority input and Garda Síochána input – this methodology has a proven track record of being able to take into account the very localised consequences of any changes. Yet this methodology is nowhere in evidence within the plans and it is not clear if An Bord Pleanála will take this into account or how they might go about it if they were even minded to do so. It is my view that this application lends itself perfectly to an oral hearing so that amendments could be made at that level of minute details.

### **Bus Stops**

A considerable number of bus stops are being removed. This alone would bring about shorter journey times as the bus isn't stopping as much as it would otherwise be. It is a deceptive and scurrilous action in journey time reduction and does not in any way consider the walking times of elderly or infirm passengers.

### **Elderly and Disability Access**

The public transport system has very little equality of access for the people with mobility issues. Every bus has a very limited number of spaces to accommodate wheelchairs; priority for mobility impaired people is reliant upon those very people asserting their rights and relying on bystanders to support them in those assertions. Safer and more reliable means of transport for those with disabilities and the elderly is by taxi or by private adapted car and in some instances special transport is required and provided. All of these need access to the roads that these residents live on. While taxis will be able to use the bus corridor, all other private transport will not.

The entirety of the bus corridor plans need to be proofed with the rights of persons with disabilities and the elderly in mind.

### **Parks, Sports Facilities and Playgrounds**

Sports facilities for the young and old are at a premium across the South City area. Every smidgeon of park is booked by several entities and well used by all sports groups/clubs and running clubs. Young children are reliant on lifts from parents to get to the parks and access is needed to successfully accomplish this. While it might be counter intuitive to drive to a park for fresh air and exercise, the fact is that it happens and bus routes are not always direct to the parks utilised by the community.

Consideration must be given to users during the winter and the fact that it isn't safe for young men and women in general due to antisocial behaviour in the vicinity. And the solution to that isn't gardai, nor should it be left to the Gardai – we really need to give proper consideration to the fact that safety must be paramount.

### **Consideration of Reasonable Alternatives**

Chapter 3 of the Documentation entitled "Consideration of Reasonable Alternatives" is supposed to deal with alternatives. One might expect that detailed explanations would be found therein that would give residents the confidence that this is the best way forward and nothing else would be as

effective. But this document is nothing of the sort. It has one sentence the length of two lines that dismisses the option of rail based public transport as not having the population to support it.<sup>3</sup> Areas within this corridor and to be served by this corridor have seen a population rise of up to 10.2% (CSO 2021), and more housing is scheduled to be built along and around it.

We are talking about 2040 plans that appear not to be able to conceive population growth. On top of normal nature population growth as evidenced in the recent census, according to government sources over 30,000 Irish people return to Ireland from abroad to live and work every year. We have had over 80,000 Ukrainians come to Ireland in a little over a year and a half, it is estimated a significant number of them will not return to Ukraine but will make their long term home in Ireland and I certainly hope they do. We are incentivising housing developments in these areas and yet we cannot plan for a population increase!!

The metro alternative at paragraph 3.2.6 merits 201 words over three paragraphs.

I'm sorry but this is not a consideration of any sort of reasonable alternative – an abject failure to consider population growth and metro when citing a reduction of travel times over that same period of 45 seconds is an insult to the people whose lives will be so utterly changed as a consequence of it.

#### Local Businesses:

The businesses in Kimmage and Sundrive Road will be disproportionately impacted by the implementation of this corridor on top of the Greenhills/Crumlin and Templeogue CBCs and this must be considered by the planners when making any decisions regarding these three CBCs. This corridor effectively shuts traffic to those businesses who are employers during peak hours. This will cause a cultural change and habit of seeing those businesses in the public psyche which additionally will lead to a fall in business and footfall.

I have had similar complaints from the traders on Lower Clanbrassil Street, who are deeply concerned regarding loading bays, one of whom stated: *We are her since 1981 and we have long term lease for two premises at ... lower Clanbrassil St. We will have to cease to trading if we cannot use our premises to load and unload vans/ take deliveries / customer collections etc. ... If this bus corridor goes ahead it will result in job losses affecting family and staff after over 40 years trading. We have other businesses trading on this street who will also suffer similar issues.*

#### Reduced Journey Times:

Nowhere else in the Bus Connects plans is there such a glut of change impacting on established businesses, urban villages and a small residential area. The proportionality of this impact on the lives of residents and their ability to gain entry to and exit from their homes must be weighed against the supposed benefits of short gains in terms of minutes saved in travel times to the city centre.

The boast of the NTA is reduced journey times. The reduced journey times are claimed as a significant reason for the changes however these are minimal, for instances in the Traffic and Transport Chapter 6 document, page 79 it says:

---

<sup>3</sup> Chapter 3 Page 5

*Based on the results presented in Table 6-39, the Proposed Scheme will deliver average inbound journey time savings for F1 service bus passengers of **c7.4 minutes (32%) in 2028 and c5.4 minutes (26%) in 2043**. Furthermore, results presented in Image 6.14 suggest an improvement in bus journey time reliability in all 4 core scenarios as indicated by the reduced ranges of journey times achieved with the individual durations focused much closer to the average journey times (lower standard deviation) in the Do Something scenario (blue dots) with the Proposed Scheme in place compared to the more dispersed range in the Do Minimum scenario (red dots).*

This figure arises when you compare “do something” with “do minimum” projections for the inbound journeys – the same exercise for outbound journeys provide an improvement in journey times from between 2.8 minutes to as little as 1.5 minutes. So ultimately we are talking about a reduction in travelling times of 5.4 minutes going into town, and 1.5 minutes coming out of town. SERIOUSLY!!!!

Let us be clear ... the calculation is that by 2043 we will save 90 seconds coming home in the evening!

By 2043 we could have a very accessible Metro system in place that could cater for increased population and would be significantly more attractive to changed modalities.

These plans are warranted from a cycling infrastructure perspective albeit even that needs to be improved, but from any other perspective there are better ways to achieve the macro objective of changing modalities than this considerable expense for such a limited improvement.

### **Impact on the Business Community**

The bus corridor will traverse Kimmage/Sundrive impacting traffic going to Kimmage/Sundrive, the village closest to Mount Argus. These all have established businesses and are currently accessible by car, bus and bicycle.

An example is the access to Sundrive Road via Kimmage Road Lower. The businesses and supermarket, including access to Mount Argus and Mount Jerome Cemetery will only be accessed directly between 10am and 4pm or after 8pm daily. The businesses in Sundrive believe that this will have a devastating impact on the viability of their businesses. Delivery vehicles including HGVs will still need access to businesses in the villages and will now be diverted along alternative routes, their means of access to the businesses within the bus gates is unclear. Kimmage/Sundrive all have a large number of businesses catering for everything from butchers, greengrocers, florists, party supplies, hairdressers, credit union, bank, hardware, library, accountants, solicitors, gyms and many others. These are all businesses that are relied on by the local community and are viable because of the access to them by the local community. Compensation for loss of business needs to be considered as a reality for businesses who will be affected by the loss of footfall and with that the consideration of the loss of jobs.

There is a huge disparity even between the road treatments in different corridors. Kimmage Road Lower is arguably a narrow road and the bus gate is limited to peak hours, inexplicably on a Sunday also, a seven day a week bus gate rendering the road unusable except during a small window of shopping times. At the very least the bus gate should be shortened and limited at most to 6 days per week.

## Heritage Concerns:

Dublin City Council gave an award to the Kingfisher Project, a project dedicated to the preservation of wildlife in and around the River Poddle. This project conducts its work directly in the pathway of the newly proposed cycleway. Their work includes preservation of the historical and cultural significance of the Stoneboat and its surrounding ecosystem. They have made a submission that will express the extent of their work far more eloquently than I ever could, but it should be noted that there is very significant heritage and wildlife in that particular area.

The Stoneboat itself was built in 1245 AD and restored in 1990 – again it would be directly impacted by the steel pathway.

## Additional points made by individual residents:

- Pages 70 and 71 of the NTA Transport Strategy for the Greater Dublin Area 2016 to 2035 ("GDA 2016 to 2035") sets out 16 corridors described there as "Core Radial Bus Network". The Kimmage Corridor is the only one of the 16 corridors part of BusConnects which was not included in this plan. Please note that the only corridors described there are "Tallaght – Rathfarnham – Terenure" and "Marlay Park to Rathmines". These two link up in a very small map at what is clearly Terenure village. The only provision for changing the corridors is a placeholder saying the Ballymun Phibsboro corridor may be amended. Thus until this plan was updated in early 2023, there was in my submission no basis for pursuing the Kimmage corridor. In its subsequent development plan 2016 to 2022 ("DCC 16 to 22"), the City Council at page 123 effectively recognized the NTA plan "core Bus Network" (with no Kimmage corridor!) as determining DCC policy. Chapter 08 Movement and Transport deals with this. It states at page 118 that "future public transport projects will now be guided by the National Transport Authority's Strategy for the Greater Dublin Area 2016-2035" Anyone therefore familiar with DCC 16 to 22 and proposing any action on any other corridor could clearly see that a bus corridor was planned. By contrast those on the Kimmage corridor would have no visibility on this until it "dropped out of the sky" in late 2018. It is not in my view open to NTA to act in this way. The city development plan recognizes the commercial area at Kimmage as tier 3; it seems fundamentally inconsistent with this that access to there is shut off by a corridor not part of DCC 16 to 22. Therefore I believe the proposal contravenes that development plan. That would have been the effective development plan until 14 December 2022.*

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

*It would also be my position that the first time NTA had any authority to advance a Kimmage corridor was after the 2022-42 Plan was adopted, as under section 12 Dublin Transport Act 2008, Ministerial approval is needed for the new plan to become effective.*

*I note that in justifying another more minor change from GDA 2016-2035 on the Belfield Blackrock corridor, the NTA Belfield Blackrock response refers to the Transport Strategy for the Greater Dublin Area 2016 to 2035. I would point out that in the map on page 71 of that document there was no provision for linking the Bray N11-UCD-Donnybrook and the Dun Laoghaire-Blackrock-Ballsbridge corridors together. As NTA have cited this in page 19 of their Belfield Blackrock response as the basis for so doing, it is appropriate to point out that in a session of the Dail Transport and Communications Committee on 4 May 2022 (see page 7 of transcript), the Deputy Chief Executive of NTA in a contribution on a DART extension in Wicklow indicated that if something was not in the plan it lacked statutory authority to be submitted to the Bórd and could not be done. This was in the context of explaining the difficulty the NTA had with progressing a project of extending DART to Wicklow, a project requested by a Wicklow TD. This begs the question as to other consequences of something not being in the plan until at earliest January 2023. It seems wrong in principle that DART to Wicklow can be turned down and not pursued for not being in the GDA 16-35, but Kimmage can be pursued while not in the same plan.*

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

*Further the net effect of the current Kimmage plan is to severely restrict access by car to a village acknowledged in DCC 2022-2042 as an urban village. I submit it is wholly inconsistent with the provisions around urban villages to permit access to be cut in the way proposed.*

2. You will have received a very significant and strongly worded submission from the residents of Stannaway Road, the residents of Mount Argus Park Estate who all make extremely valuable points regarding heritage and environment. These matters cannot be dismissed.
3. *"I have been speaking to some neighbours and it appears from the plans for Bus Connect they are blocking traffic going from our area Derravaragh Rd/Corrib Rd down Terenure Rd West as we can do now by putting bollards at junction of Derravaragh /Corrib. Our objection is how unsightly the bollards are and also there are already a set on Derravaragh/Aideen which would mean when I come out of my house and turn right 20 meters away I am confronted with a set of bollards and if new plans go ahead, turn left and 20 meters away there will be another set. Our suggestion is there will be no need for the bollards at Aideen anymore because traffic will not be able to access from outside area and it would mean the local residents would have alternative access to Kimmage, Harolds X, and Terenure if those bollards are removed. Also our other suggestion is to put secured Plantar Boxes instead of bollards to make it more aesthetically pleasing. These two suggestions would go a long way to make up for all the new plans which are not wanted."*

They are just samples of the many many emails, calls and texts I have received. Huge changes in the way we live our lives are necessary if we are to properly play our part in climate change, I completely agree with that. We must bring people with us, however. We must respect their investment into

communities, into the shared living spaces of villages, public parks and shopping patterns. We cannot bully through bus routes to effect climate change while causing traffic chaos that will increase air pollution, reduce footfall to businesses and inadequately deal with the need to provide complete cycling infrastructure. We must have consistency in decision making – we cannot rob Peter to pay Paul and this plan appears to do that.

## Conclusion

Along with colleagues I held public meetings, every one was attended by hundreds of people. Other public representatives held meetings as well and they too were extremely well attended. I would say the combined attendance of all public meetings exceeded 2,000 residents. I have received emails and messages in the hundreds in numbers – only two emails were fully supportive of this corridor.

I urge the deciding members to make the many microscopic and the larger changes to this route that will take into account the needs of the local residents. Moderating the scheme would lead to improvements that would be broadly accepted. The public are supportive of improved public transport and cycling. Many cite that changes such as changing the times of the bus gates would be of great assistance in getting local support and this one change alone would have the effect of supporting less traffic diversions, less rat run trips and significant traffic flows.

I urge you to either send the NTA/Bus Connects back to the drawing board for alternatives and proper environmental impacts, for complete cycling infrastructure and for quality of life or make the detailed changes that are needed to make this viable.

I remind you that you are obliged to give an explanation for your decision making – a broad acceptance without detailed explanations of your reasoning for acceptance or rejection of the entirety or the individual elements of the scheme will not be acceptable – in actual fact the only way to do this justice is to hold an oral hearing.

## Oral Hearing

The detail in this scheme is such that each micro decision needs to be viewed on its own merits and either accepted or rejected. The Bord must take into account all of the considerations for every signal decision along the way – some may be good and positive and others so obviously meriting rejection. However, what is left when what is positive remains and the rejected proposals have been removed must be considered with due regard to the effectiveness of the scheme and the benefits of the scheme at a macro level. I do not believe that the information supplied by the NTA is adequate for appropriate and informed decision making. I am aware, by way of example, that there are conflicts in base plans and contradictions across plans supplied for those affected by CPOs. I believe that the only way to appropriately consider each section of the scheme with the level of information that would be required to make an informed lawful decision would be to hold an oral hearing. I believe there should be an oral hearing on this route and I am asking for one to take place.