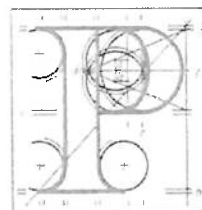


Our Case Number: ABP-317660-23
Planning Authority Reference Number:



**An
Bord
Pleanála**

Paul Ryan & Others
19 Greenmount House
Greenmount Office Park
Harolds Cross

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.

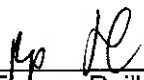
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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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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 Templeogue/Rathfarnham to City Centre Core Bus Corridor

Bord Pleanála Case Reference: HA29N.317600

Written By Paul Ryan

Home Address: Galteemore 61 Whitehall Road Dublin D12E8RD

Business Address: 19, Greenmount House, Greenmount Office Park, Harolds Cross D6wEW81

Email

[REDACTED]

Tel:

[REDACTED]

This submission is being supported by the attached businesses, I have supplied their names, addresses. – I hold email and telephone data for them should it be required.

Paul Ryan Pension & Financial Consultants Ltd 19 Greenmount House

William Harvey Ltd 6/7 Greenmount House

Association of Optometrist Ireland Greenmount House

Catherine Grennell-Whyte Unit 1 Argus House

Mark O'Toole 7 Argus House

I am confining my observations in the main to those areas of this corridor that affect the trading business of these companies and the potential effect it will have on them, their clients, staff, and customers.

Initial Premise & Objectives are Flawed.

We believe that the initial premise is too narrow and therefore we should be considering alternative options for Southwest Dublin including Metro, as not only are all journeys starting in the suburbs and travelling into the city centre, but many are to cover cross journeys using multiple corridors. The costs involved in this project are of a magnitude that should lead to considerable impact not only on residents of the areas but also businesses themselves.

The key measures therefore are efficiency, safety, integration, sustainability, and the impact on the environment; however, we believe that the changes will lead to increased traffic and journey times thus pushing additional costs on firms within the locality.

A lot of work done during business hours is carried outside of physical premises and there is a need to travel, these journeys are often across proposed “corridors” and with the proposals it will add considerably to the cost of transacting business.

There will be reduced access to traditional thoroughfare roads for those commuting by car. Not all journeys can be carried by Bus as many are commuting from inaccessible areas not covered under the Bus Connects proposal. **Every journey is not into the city centre** but quite a substantial number are indeed “cross town” for both personal and business use. Many of the cross-town orbital routes are transacting the main corridors and will be subject to serious delays. There is a likelihood that a lot of essential car journeys will flow through a very small number of access roads rendering them stationary due to sheer traffic volumes as there will be insufficient public transport available to meet the demand.

Business Execution for Kimmage/Harold's Cross

All the points listed below will have serious implications for business owners, staff, and clients in accessing their services creating difficulty for all, as many of the meetings must be face to face rather than by Zoom or Teams or other online platforms.

- Lower Kimmage Road to be closed in Kimmage scheme at Ravensdale Park – 8 hours every day.
- Lower Kimmage Road to be closed 24/7 at Mount Jerome by a bus gate.
- Traffic lights at KCR to be modified – which we feel will cause further delays to both general traffic and buses on route to and from the corridors.
- Further compounded by the bus gate at the lights at Kennilworth – Bus Gate outbound at Kennilworth Park arm. Kenilworth Road at 5-way junction.
- Traffic lights at Harold's Cross bridge – no Right turn to Grove Road. This will present difficulties as these will have a knock-on effect for Rathmines and Ranelagh. This will obviously have implications to business and costs associated with doing business as many of the meetings cannot be travelled to by bus and travel by car is more than likely the only alternative.
- Sporting facilities will be seriously interrupted by the closure of Lower Kimmage Road.
- The access to medical facilities will be severely restricted due to the closure and restrictions in all these areas.
- Derravaragh junction with Corrib Road closed off and Upper Clogher Road bus only.
- Clonard Road and Bangor exit to Crumlin Road closed – cul-de-sac as Sundrive, Larkfield and Clareville will be the only way to get from east to west, they are likely to have *substantial* extra traffic.

Each of these restrictions will seriously affect the ability of our businesses to transact their day-to-day operation and will have a serious cost implication and this will have to be passed to our clients adding to inflation and other competitive cost factors. The additional time needed because of the restrictions will also add to our carbon footprint overall.

Effecting Business Execution in and around Terenure

Equally, all of the points listed below will have serious implications for business owners and staff and clients in accessing services as many of the meetings necessitating journeys in and out of the area need to be face to face.

- Templeogue Road at its junction with Fergus Road will have an inbound bus gate operating 6am to 8pm 365 days.
- Two right turns ex Templeogue Road into Rathdown.
- Right turn ex Fortfield Road into Greenlea Road or Lavarna
- Right turn ex Wainsfort Road into College Park.
- Terenure Cross will now include an extra light sequence to allow buses turn right ex Rathfarnham Road.
- The left slip from Rathfarnham Road into Terenure Place will be removed.
- A right turn ex Templeogue village to Springfield Avenue will be permitted. However, there is only one combined lane for traffic going straight ahead and turning right.
- There will be extensive and likely disruptive road works at the Spawell Roundabout, which is to be converted to a four-way junction. This roundabout handles a traffic volume close to that of Walkinstown roundabout.
- All will impact our day-to-day business.

Effecting Business Execution with the following restrictions etc on the Rathgar Road.

- Rathgar Road outbound. There will be a complete ban on traffic outbound on Rathgar Road.
- The slip lane outside Supervalu (which is a parking bay) will be closed.
- All turns into Rathgar Road affected by one way system.
- The suggested contra flows outbound with the new right turn into Highfield Road from Upper Rathmines Road, it is likely, with the addition of two bus routes, to become a traffic nightmare.
- Journeys going from east to west from Terenure Rathgar and Harolds cross will be extremely difficult and time consuming given the restrictions in Ranelagh for access to even the N11 due to numerous right turn restrictions on existing routes.
- Journeys to eastern locations will present serious difficulties for all areas.

Implications for Ranelagh

- The right turn traffic ban at the triangle from Rathmines - this will direct all traffic left toward the Luas station. **This will present an impossible situation to reach East Link and the N11 and all coastal areas.**
- The left turn towards Milltown from Sallymount Avenue
- The right turn from Merton Drive including accessing Marlborough Road
- The left turn ex Ranelagh into Sallymount
- The right turn ex Ashfield Road
- The right turn from Grand Parade into Dartmouth Place
- Given that traffic will be forced to turn left at the triangle, it seems likely that all roads in the Dartmouth Square areas will get significant extra traffic accessing Leeson Street.

Implications for Rathmines

Additionally, all the points listed below will compound the impact on the immediate area of our businesses as the traffic from there will have to find new routes. They will not simply disappear!

- Lower Rathmines Road will be closed to all inbound traffic by a bus gate between the entrance to St Marys and Lissenfield. This is to apply 06.00 to 20.00 seven days a week.
- Mount Pleasant Ave will be cut in two at Bessborough. Areas to the north of this can only be accessed from the canal. Areas to the south will have to be accessed via Ranelagh or Rathmines village.
- No left turn into Williams Park and No exit out of Williams Park
- It is understood that a right turn will be permitted out of Leinster Road

Roads that will get extra traffic on BusConnects own admission (pp153-166 Traffic and Transport)
It should be noted that the only periods covered in BusConnects projections of extra traffic are 7am to 10am in the morning and 4pm to 7pm in the afternoon. They have wholly omitted to deal with any other time of day when extra traffic may be more noticeable. In looking at this point if we assume that approximately 25% of all journeys are expected in time to be using public transport what is to happen to the other 75%?

Given that Rathmines Road will be a prohibited route, the up to 9,731 vehicles that use this route inbound and up to 9,916 vehicles that use this route outbound will have to find a different route as will the up to 73 inbound lorries (figures per traffic surveys of Bus Connects)

Roads that seem likely to get extra traffic on observation

Rathgar Road will be a prohibited route outbound, up to 9,925 vehicles that use this route will have to find a different route, as will the up to 522 vans and lorries.

Kenilworth Road will be a prohibited route at the five-way junction, the cars that use this route will have to find a different route as will the vans and lorries.

Highfield Road is likely to get increased traffic including the lorries, as it seems to be the likely preferred option for accessing Rathgar from Rathmines.

Rathmines Road will be a prohibited route, up to 9,731 vehicles that use this route inbound and up to 9,916 vehicles that use this route outbound will have to find a different route as will the up to 73 inbound lorries.

Traffic will be forced to turn left at the triangle in Ranelagh, it seems likely that all roads in the Dartmouth Square area will have significant extra traffic accessing Leeson Street forcing commercial traffic through unsuitable narrow residential area which is a recipe for disaster.

Every one of those extra vehicles passing through restricted residential area will lead to increases in stationary traffic due to sheer volumes, all affecting the environment and air pollution.

We would question the practicality of some of these restrictions as many journeys not only do not go from suburbs to city centre at peak times, but many would also go in opposite direction for business executives going to meetings and staff and clients going to each business premises not to mention accessing education facilities, hospital, sporting facilities. The only mechanism for travel in many cases is by car. There would appear to be no consideration for those who must commute across these corridors to get their business and other activities catered for.

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 to get to their desired location. The fact is that they won't do that, they will have no choice but to travel by cars and there will be an increase in car volumes on many of the now proposed more limited arteries to these destinations.

The environmental impact of these changes will have serious implications on the economy from several aspects, these would include additional time spent in traffic for the benefit of circa 25% of the journeys seems to be imbalanced and the environment will be the long-term sufferer in this case.

This total proposal needs to be looked at in conjunction with all the corridors, A, D and F, and consider other options such as a Metro to solve the transport issues given the areas are full of narrow roads and with increased potential population one needs to cater for the next 50 years rather than a short-term fix.

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 objectives of this proposal behind these schemes in the first place. The sustainability reasoning simply doesn't exist or is certainly not apparent for residents and businesses.

Environmental Impact Study should be carried to consider the accumulative effect on all the bus corridors, not merely each one as all the corridors need to be look at jointly and not on an individual basis. It would also be important to look at alternatives to Bus Connects

Cycling

There is definite need to encourage more people to cycle and walk and use public transport, this needs to be looked closely but, in many cases, there is a cycle lane which suddenly disappears and as a result there is considerable danger to cyclists. In many cases the cycle lanes are not adequately lit and can cause issues particularly when the weather is inclement which is often in the winter months.

The segregated cycling tracks are not continuous along the CBC routes. There are sections of road where segregated cycling lanes cease altogether to prioritise bus lanes. This is a very significant flaw that prioritises the minutes shaved off bus journey times.

The need to have bus gates as a 24/7 is completely wrong and to prioritise bus routes where the demand for normal traffic and cycle lanes. This point needs to be looked at given that businesses generally operate between the hours of 8am and 6pm. There are many roads that will have no cycling infrastructure at all and the need to have them operational is questionable on a 24/7 basis. This would have a serious consequence to business along those routes which need to have access for their staff and customers alike.

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

Delivery of integrated sustainable transport movement along the corridor, could be considered commendable but not if it does so at a significant cost to all other transport movement in the peripheral road network surrounding the corridor.

There is a huge need for sustainable public transport, and we believe that an enormous level of change is needed to achieve it, however a joined up thinking approach is needed to achieve a long-term solution.

As stated previously the implications of the various bans on travelling on roads either with a bus gate or inward or outward and turn restrictions in contrary to being able to transact business efficiently, this is questionable not only from a practical and cost perspective but also from an environmental

position due to increased journey time for staff and clients to either transact business or travel to their place of work.

As the surrounding roads are either not accessible at all because of a bus gate, or barred from access due to the implementation of a ban on right hand turns, many routes will be overpopulated with traffic. This might be bearable if it were during rush hour/peak traffic times only, but it isn't – it's from 6am to 8pm every day of the week. The timing of the bus gate is nonsensical and an unnecessary diminution of the quality of life of the residents in that area. Residents and business owners and their clients and staff will have to drive much longer routes to gain access to homes and businesses.

Flawed Public Consultation for Business and Residents

Many of the meetings on the consultation were done during covid and the true consequences of the changes were only seen on return to previous work practice. There is a definite need for further public consultation and showing the anticipated consequences of cross corridors for businesspeople to see how it going to impact on their business. When this is done one can assess further the consequences to their operations.

No doubt, some changes have come about due to public consultation and public representative lobbying including representation from many residents' associations and business groups. Many of the consultation meetings took place during Covid restrictions and were not properly represented with the views of the effected people.

Disproportionate Impact with Little or no Gain for Business

We believe that the following corridors cannot be looked independently and that all should be looked at as a joint consideration. The Templeogue Rathfarnham corridor, Terenure Kimmage corridor and the Templeogue Kimmage should not be adjudicated on independent basis but should be adjudicated as one issue. Many of the submissions will have comments that have consequences for all corridors.

The businesses in Terenure and Kimmage/Sundrive and our firms in Harolds Cross/Rathmines will be disproportionately impacted by the implementation of the various corridors. We feel that this has a disproportionate effect on the areas that we transact business and has consequences to our villages and residential areas.

There is the impact on the lives of residents and businesses and their clients and employees and their ability to gain entry to and exit from their homes and their place of work must be considered verses the potential benefits achieved by Bus Connects.

Delivery vehicles including HGVs will still need access our villages and will now be diverted along alternative routes, their means of access and egress within the bus gates is unclear and as a result if the gates were not clarified could have the long-term effect of loss of jobs.

Greenmount Industrial, Business & Office Parks, KCR Industrial Estate, Terenure Village, Rathfarnham Village, Fortfield Park shops, Kimmage/Sundrive all have many 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.

The schools in the area are all on roads that will now have a significant increase in traffic volumes, the elderly, the visually impaired, mobility challenged, and child safety does not appear to be a factor anywhere in these plans not to mention access to businesses in the areas impacted. This will also cause some safety concerns for children and staff travelling.

The right turn bans are going to lead to a lot of u-turns in the areas where they apply, and these will be done on roads that already have increased traffic volumes. This will create a serious safety issue for pedestrians' busses cyclists and normal car traffic.

Conclusion

The whole bus connects project by the NTA is flawed as it does not look at alternatives to this suggestion and the main need to investigate an alternative would be to consider a long term traffic plan for South west Dublin as being a Metro, whilst this is an expensive alternative, given the complexity of the roads and their narrow nature would be an excellent alternative and then maybe a version of the proposal may work. This would have the ability to satisfy the carbon footprint along with a practical solution. it would also solve the density issue as the trains could be lengthened or shortened to cover peak and non-peak journeys.

We would feel that a proper consultation considering all reasonable alternatives would be a way to go forward and to bring the residents and the business owners and their clients and staff along with the proposed changes as they will have long term consequences for employment and access to services in the total area of Southwest Dublin.

We believe that the quality of life for people working in the areas will be seriously impinged upon due to excess time being spent travelling too their place of work as many will have to cross several corridors on their way to work.

The fact that there is likely to be a considerable increase in their carbon footprint to carry out personal tasks and business within those areas is a consideration which does not appear to be considered in the planning application.

The knock-on effect on the economy will be substantially negative and should be looked at as a long-term solution rather than a quick fix for bus connects to sort traffic from suburbs to city and vice versa with no consideration for cross traffic.