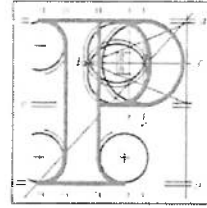


Our Case Number: ABP-317660-23



**An
Bord
Pleanála**

Terenure West Residents Association
10 Greenlea Park
Terenure
Dublin 6W
D6W AW70

Date: 07 December 2023

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

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

Teil (01) 858 8100
Glaó Áitiúil 1800 275 175
Facs (01) 872 2684
Láithreán Gréasáin www.pleanala.ie
Riomhphost bord@pleanala.ie

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

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

TERENURE WEST RESIDENTS ASSOCIATION

C/O. 10 Greenlea Park , Terenure Dublin 6W
D6W AW70

An Bórd Pleanála
64 Marlborough Street
Dublin 1
D01 V902

5th December 2023

Re. Kimmage Core Bus Corridor 317660

Dear Sirs

The following is an observation on behalf of Terenure West Residents' Association. The Association represents an area of approximately 600 households to the west of Terenure village, in an area bounded by Greenlea Road, Fortfield Road and Terenure Road West. Full details of each road are set out at the end of the letter, together with some detail about each road, which is relevant to this application. We particularly draw your attention to the schools in the area and the threat to children's safety posed by the scheme.

At the outset we must register a protest that we and our residents will seemingly be required to pay a fee of €100 to you if we want to write to you on this scheme having already written to you about the clearly related Templeogue Rathfarnham Scheme (your reference **316272**), which is also likely to have a very major impact on our area. There is no reason why the two schemes should not be treated as one by you, occasioning only one fee. We are perhaps the only area of Dublin subject to this very unfair double fee imposition by your board. We are asking you to rule that the €50 fee which we now submit will be refunded as an inappropriate double charge .

We welcome those provisions of BusConnects, which will provide better bus services for our area and/or which will significantly decrease the time taken by a bus to get to its destination. This scheme achieves nothing in these respects, but creates enormous inconvenience for residents in Terenure, endangers schoolchildren by vastly increasing traffic on roads with schools and is environmentally damaging.

We agree that the use of cars needs to be significantly reduced. Our actual statistics related to our area show quite high bus and bike usage. However there are practical reasons why some people need to use their cars ranging from lack of mobility, children needing to be in several different places at much the same time and trips such as shopping, which cannot really be conveniently carried out by bus. There is also the practical consideration that there is an ongoing migration to electric vehicles, which should eliminate the pollution risk arising from their operation.

Our key issues:

1. Increased traffic volume on our local roads, particularly Fortfield Road, Greenlea Road and Terenure Road West.
2. Loss of access to Kimmage urban village
3. Loss of access to the most convenient route northbound from our area
4. The above negatives being completely disproportionate to the benefit of the scheme
5. The inadequate consultation process

AN BORD PLEANÁLA	
LDG-	<u>068428-23</u>
ABP-	_____
05 DEC 2023	
Fee: €	<u>50</u> Type: <u>Legal</u>
Time:	<u>12:49</u> By: <u>Head</u>

1. Increased traffic volume on our local roads, particularly Fortfield Rd, Greenlea Rd. and Terenure Rd West

The traffic surveys done in connection with the scheme are very out of date and virtually impossible to interpret due to their formatting. We would ask that you direct NTA to produce these statistics in a format that everyone can assimilate .(as used for Northside corridors)

However a limited review of them shows that about 13,000 vehicles daily use Lower Kimmage Road inbound of which about 25% turn into Ravensdale Park. The unnecessary bus gate at Ravensdale Park will block about 10,000 vehicles from using the most direct route.

We fear that a very significant number of these vehicles will divert into Terenure Road West (already severely congested) and Greenlea Road. It is also likely to cause increased use of and create tailbacks on Fortfield Road. This will be a major environmental hazard on what are residential roads. It will endanger public safety in an area with four schools (St Pius, Our Lady's, Terenure College and Presentation College). None of these issues are addressed in the application. Our problems are complicated by the "double whammy" of an unnecessary bus gate on Templeogue Road. (ref 316272)

We note that Terenure Road West is to have three important bus routes the S4, 74 and 81 (now 15A). We cannot understand why NTA wants to seriously delay these services and also increase the time taken by the F services.

We also fear a vastly increased use of a right turn into our area from Wainsfort Road into Fortfield Road and from Fortfield Road into Terenure Road West. These shortcuts have been a source of accidents and any increase in their use would be very problematic.

The application makes no provision whatever for how HGV vehicles can navigate the area if Lower Kimmage Road is not accessible.

We have asked repeatedly for integrated traffic models to be reflected in all corridors. What is supplied is inaccurate and grossly inadequate. NTA need to explain how general traffic is to flow if bus gates are in place.

2. Loss of access to Kimmage urban village:

As is noted in the planning application Appendix A 10.1 there are numerous businesses in the Kimmage urban village. These are used by many members of our local community. It is unacceptable that access to these be cut off by a bus gate in the morning and evening. It is particularly unacceptable that this restriction is also to apply Saturday and Sunday. These businesses include branches of Tesco and Supervalu, many professional businesses and a number of useful motor related businesses.

In addition the various bus gates cut us off from Mount Argus Church and Mount Jerome cemetery. These are used by older and less mobile members of our community.

We note that the idea of a bus gate close to KCR (which causes the Kimmage problem) was first mooted just as the Covid crisis began. This has not been consulted upon other than in a desultory fashion.

3. Loss of access to the most convenient route northbound from our area:

Due to recurrent traffic congestion in Terenure village it is customary for road users to make northbound journeys by a road that is now proposed to be cut off at one point by a bus gate operating 24/7 -365 days of the year. It is not acceptable that our key main road be cut off in this way, particularly when it is also proposed to cut off Lower Rathmines Road for access. We object to the use of any bus gates on Lower Kimmage Road. We believe that NTA have not properly considered the use of bus priority lights on the wider stretches of the road.

The alternative route is not specified and assessed in the application. This is a key omission. It seems that we may be forced to drive through residential estates in Crumlin, which are simply not suited to through traffic.

We further note that it will be very difficult to turn right off Harold's Cross Road. A right turn is to be banned at the canal and there is not a dedicated right turn at South Circular Road. We think the current arrangements at both places should be continued. We are also concerned at the destruction of historic parapet walls at the canal.

4. The above negatives being completely disproportionate to the benefit of the scheme:

The scheme accepts that the time saving achieved by having the corridor is minimal, reducing to a few minutes in both directions by 2043. It also accepts that by 2043 the increase in bus passengers is minimal.

Further any time saving achieved will be cancelled out by the plan to divert the **F** buses by a circuitous route in the city centre. We the commuters were not consulted on this change and would prefer that **F** routes continue to access the city via Christchurch and Dame Street. Further, we expect that the F1 which replaces the 54A will be delayed entering the corridor at KCR as it currently is, but worse. In fact we expect it will take much longer to get to town than is now the case, so there is no bus benefit from the scheme.

We should say that the current 54A is used by our local community because it is a relatively quick route to town, taking about 25 minutes (of which about 15 minutes is the proposed corridor).

This "upside" is wholly untenable when compared with extra traffic on our local roads, the loss of Kimmage access and the loss of our main north bound route.

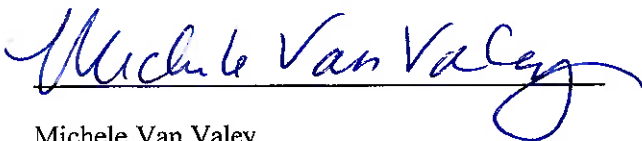
5. The inadequate consultation process:

We resent any inference that there has been a proper consultation process. All that happened was the convening of one inadequate meeting prior to Covid.

It is further an outrage that one local residents group Lower Kimmage Road Residents Association commonly known as LOKRA has been afforded seven separate meetings, whereas we struggled to get a single meeting with NTA. We feel this horrendous imbalance resulted in the introduction of the Ravensdale bus gate and is evidence of gross bias by NTA towards one group to the detriment of others.

The consultation process entirely exclude those who are not technologically inclined, a fact the subject of much complaint by our members to our Association. Needless to say we think the process drove a cart and four horses through the *Aarhus convention* consultation rules.

We ask that you reject this scheme in its entirety.



Michele Van Valey
Honorary Secretary

For Terenure West Residents Association

DESCRIPTION OF OUR ROADS

Census 2016 (which we believe is the latest to breakdown our area in detail) shows a population of 1,854 in Terenure C, the bulk living on the roads below. 348 were then over 65 years of age. 275 were between 55 and 64, all now likely to be around 65 years of age. 471 were below 19 years of age, with over 200 below 10. This gives a sense of the population likely to have car dependence to some extent.

The then analysis of commuting shows 414 (565 with passengers) driving by car and 554 by bike, bus or on foot. So about half and half. Most households had one or two cars.

Fortfield Road

This is over 1km long and runs between Templeogue Road on the Templeogue Rathfarnham corridor and KCR, the start of the Kimmage corridor. It is primarily residential.

However there are two schools on it, Terenure College and Our Lady's School. Further, St Pius National Schools are about 250 metres from the road. We believe that across the three schools there are over 2,500 pupils. There is accordingly a very significant volume of school related traffic on the road and a number of "lollipop" crossings at school times. The local parish church is about 100 m from the road. We consider the proposals are a grave danger to school children, because they will increase congestion on the road.

The 54A bus route traverses most of the road. While this is currently a two buses an hour service, this is to be upgraded to six an hour under BusConnects.

There is relatively little parking on the road, except for some spill over parking at the Templeogue Road end associated with Bushy Park and at the junction with Greenlea Road associated with shops and businesses and with busy funerals in the nearby church.

Glenavy Park

This is an exclusively residential cul de sac of about 20 houses leading onto Terenure Road West and therefore affected by its issues.

Greenlea Avenue

This is a short exclusively residential road connecting Greenlea Road and Parkmore Drive largely used for local access.

Greenlea Drive

This is a short exclusively residential road connecting Greenlea Road and Parkmore Drive largely used for local access.

Greenlea Grove

This is a short exclusively residential road off Greenlea Road. It is however the vehicular access to Terenure College Rugby Club and is therefore quite busy with access traffic. A substantial development proposed by the club may increase traffic.

Greenlea Park

This is a short exclusively residential road connecting Greenlea Road and Parkmore Drive largely used for local access. It has some overspill parking and is quite a narrow road.

Greenlea Road

This is a long largely residential road connecting Fortfield Road and Terenure Road West. There are over 100 houses. It is quite busy in the morning and evening peaks with some through traffic avoiding local main roads.

There are a number of local shops and businesses at the Fortfield Road end. These include a post office, a chemist, a doctor and a music school, all significant traffic attractors.

It has quite a lot of on-street parking at both ends. At the Fortfield end this is related to local shops and businesses. At the Terenure Road West end, parking is related to it being the nearest free parking to Terenure village. There can be some parking also in areas close to Terenure College Rugby Club.

Lavarna Grove

This is a residential road of around 60 houses which runs between Fortfield Road and Terenure Road West. It has a large green area in the middle used by children to play and therefore constitutes a greater risk of accidents involving children. It is however currently very quiet bar some rush hour through traffic. It may become a subsidiary alternative route if the Kimmage corridor is allowed.

Lavarna Road

This is a residential road of around 40 houses off Lavarna Grove, but joining it at both ends. Traffic would be largely access.

Parkmore Drive

This is a residential road parallel to Greenlea Road of about 100 houses. It is a cul de sac off Terenure Road West, but has three connections to Greenlea Road which facilitate a small amount of through traffic. It is very narrow at its upper end where any on street parking makes passing problematic.

Terenure Road West

This is the busiest road in the area. It is largely residential with about 120 houses. However, there is a large school at the Terenure Village end, Presentation Convent and therefore substantial school related traffic with very young children. An inevitable result of the proposed bus corridor (and the Templeogue Rathfarnham) will be increased congestion on this road. This ill thought out proposal will be a danger to our school children.

The pavements are very narrow and this creates some degree of pedestrian hazard with current traffic levels. It is particularly difficult for pedestrians to walk along the inbound bus stops. It is widely avoided by cyclists due to the high traffic and the camber of the road. There is virtually no parking on the road, as the road itself can barely carry two lanes of traffic and parking obstructs one lane.

There are currently two bus services on the road, the city bound 15A and the orbital S4. This will increase to three bus services under Bus Connects with an S4, 74 (a new service) and 81. The S4 and 74 are now in operation.

The Laurels

This is an estate of about 40 houses off Terenure Road West and affected by the issues on that road.