



Councillor Carolyn Moore
C/O Richard O'Carroll Room,
City Hall,
Dublin 2.
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To whom it may concern,

As the Green Party Councillor for Kimmage-Rathmines I wish to broadly support the BusConnects proposals and the ambition to radically upgrade our public transport system. As we emerge from the Covid crisis while continuing to deal with a climate emergency, we cannot accept a return to a gridlocked city with chronic car-dependency, ever-worsening air quality, and the ongoing loss of biodiversity. The imperative to offer safe, sustainable and low-carbon transport options has never been more urgent. I believe BusConnects will be an integral part of the transport solution for Dublin, but it has the potential to be so much more – it offers an opportunity to reimagine our city and plan for a future where Dublin is a connected, climate-resilient capital where streets are for people and private car ownership is an option not a necessity.

With that in mind, I am concerned at the levels of very vocal opposition to BusConnects that have arisen within the communities I represent in recent weeks. This, I feel, is largely due to the perception that insufficient time has been allowed for the necessary levels of consultation, and that the virtual nature of the consultations due to Covid 19 restrictions has not accounted for 'the digital divide' and has possibly excluded certain demographics. It is also, however, due to a lack of information around specific elements of the proposals, and I strongly feel the NTA should engage directly with communities at the earliest opportunity to try to fill those information gaps.

I recognise that the NTA has listened to the public's concerns in previous rounds of consultations, and this on-going engagement is reflected in the latest versions of the proposals. I hope that following this round of consultation further revisions can be made to ensure that we can deliver the transport solution Dublin needs, while enhancing our urban realm and ensuring that our urban villages and the communities that surround them aren't adversely affected.

I hope you can consider the following **general** and **specific observations** about the possible implications proposals for corridors 8 (Clondalkin to Drimnagh), 9 (Greenhills to City Centre), 10 (Tallaght to Terenure), 11 (Kimmage to City Centre), and 12 (Rathfarnham to City Centre) would have on the environment, the public realm and the quality of life of residents within the Kimmage-Rathmines area.

GENERAL OBSERVATIONS

BusConnects and Covid 19

As we await the roll-out of a wide-scale vaccination programme, it is vital that the NTA considers the profound impact that the Covid-19 crisis has had on our lives and our communities. As the effects of that vaccination roll-out begin to be felt, we might well see a return to full-capacity on our public

transport infrastructure; however some societal shifts are likely to have longer-lasting impacts on how and when we travel into the city centre.

While the overarching design for BusConnects is predicated on the need to move large numbers of people quickly and efficiently from an outer radius of Dublin into the city centre, it's important to note that the shift to remote working will become permanent for many workers, and so too will the move to online retail. Our city centre may well need to recalibrate to adapt to changing patterns, and so too the BusConnects design should be future-proofed to reflect the latest information available on travel and lifestyle patterns – particularly with regard to frequency.

Furthermore, the rapid roll-out of Covid mobility interventions by the various Dublin councils, and the concurrent modal shift to cycling, should form the basis for the NTA to reconsider some of the BusConnects cycling proposals. We need to provide safe, segregated cycling along existing desire lines to ensure that more people can choose cycling as their primary mode of transport, and – where possible – that cyclists can safely choose the most direct routes.

Environment and biodiversity

While the NTA's efforts to minimise tree loss in the revised plans are welcome, further opportunities to maximise tree-preservation exist. The Dublin Tree Strategy recognises the numerous benefits of mature trees to our cityscape, from air quality to amenity value to heritage and placemaking. As such, the NTA must strive to protect every tree possible, and planting schemes should take a holistic approach to biodiversity, with a focus on native varieties suitable for long-term retention, accompanied by pollinator-friendly plants, shrubs and flowers.

Likewise, greenways should be green - they should not lead to the unnecessary removal of trees or established biodiversity-rich planting schemes, and new routes should be greened with the addition of native shrubs and no-mow or wildflower verges.

Heritage, place making, public realm

While planned improvements to the public realm at several key junctions and villages are welcome interventions as part of the overall BusConnects proposals, it must be noted that many plans continue to be orientated towards accommodating motor vehicles. While recognising that the provision of efficient, regular and reliable public transport is a first step in enabling people to opt-out of private car ownership, it is essential that such a major overhaul of Dublin's primary public transport system aligns with the objectives of the county's various development plans.

The Covid crisis has fostered a greater sense of community in many areas, and local access and connectivity has never been more vital. It is essential that every opportunity is taken to improve the public realm and make our villages and communities liveable, walkable, clean, safe places. Public realm improvements should aim to widen footpaths and provide civic spaces and safe cycling infrastructure - not just to enable people to commute by bike into the city centre, but to facilitate safe cycling for people of all ages and abilities in, around and between our communities.

We must take this opportunity to allocate the maximum space possible to people; to design our public spaces inclusively and with The Hierarchy of the Street in mind (see below); and to pave the way for a future where our streets and urban villages are not dominated by cars. To that end, this reallocation of space should also make space for seating areas and parklets, enhanced by biodiverse planting schemes. Disability access should be prioritised in all on-street parking plans, and age-friendly parking bays should be introduced to accommodate those with reduced mobility or no access to alternative modes of transport.



Many residents have expressed concern about the quality of information currently available around public realm improvements, and I share that concern. It is vital that further consultation about the exact nature of the public realm improvements proposed is undertaken so communities can bring real local knowledge to the plans and have buy-in and ownership of the changes that occur. These changes must prioritise the safety and mobility of our most vulnerable street users; they must be inclusive and of a very high quality; and our city's heritage must be recognised and respected. All care must be taken not to turn our urban villages into places to pass through rather than stop in.

Traffic

While the anticipated impact of a vastly improved, regular and reliable bus service (along with the provision of safe cycling infrastructure) would be a modal shift that would result in a large degree of traffic evaporation, there are significant concerns that untenable volumes of traffic will be directed off the bus corridors and down residential streets.

On many routes, the traffic modelling has been vague, contradictory, and lacking in credibility for those with local knowledge, and this has led to confusion, speculation, and a good deal of upset. To secure buy-in from the wider community it is essential that the NTA can, as accurately as possible, demonstrate the impact the proposed corridors will have on traffic patterns, and further consultation is needed regarding the degree to which mitigation measures can or will be employed.

The final BusConnects design must also contain both a commitment to and a budget for 'aftercare' by the NTA – that is, ongoing traffic monitoring and mitigation measures where the quality of life of residents has been significantly altered by the rerouting of vehicles. Finally, evidence of increases in speeding during Covid restrictions should be considered when it comes to roads where traffic reductions are projected. Assurances must be given regarding enforcement of speed limits, and proposals put forward for design interventions that will ensure compliance where reduced speed limits are in play.

Bus service

Efficiency, reliability and regularity of the bus service is paramount if BusConnects is to instigate the modal shift away from private car use and over to public transport, and every effort must be made to ensure that buses are not blocked by private modes of transportation, or indeed by delivery vehicles or illegally parked cars.

Enforcement and monitoring of bus lanes and gates will be crucial, and the NTA should outline the specific measures that will be employed to prevent this.

Walking and cycling

BusConnects has never been a single-focus transport proposal, and I'm glad that the opportunity to reallocate space to walking and cycling is being taken with this project. Cycling infrastructure should be 24 hour, and segregated as much as possible, with careful consideration given to the interplay of bus stops and cycle tracks in order to minimise potential conflicts between passengers and cyclists, and likewise the integration of disability access parking spaces should provide no opportunity for users of those spaces to find themselves navigating a cycle track as they exit or enter their vehicle. The NTA must also acknowledge the degree to which school drop offs and pick ups contribute to the traffic levels on our roads and ensure that safe cycling along routes to schools is facilitated.

At this round of consultation, many people have expressed concern that the frequency and speed of busses may present a danger to pedestrians and other vulnerable road users. In many instances these concerns have manifested around pinch points or junctions where heavy volumes of traffic already present a significant danger to other road users, and there is little evidence to suggest that frequent busses would have any more or less impact. However, the opportunity exists to mitigate these concerns with the addition of more and safer pedestrian crossings, and by widening footpaths or introducing traffic calming measures. BusConnects plans should propose wider footpaths, where possible, with crossings and timings designed to ensure that people of all ages and abilities can safely cross the road; and crossings that prioritise pedestrian movement over other forms of transport.

SPECIFIC OBSERVATIONS

8. Clondalkin to Drimnagh / 9. Greenhills to City Centre

Under the revised corridor proposals, the community of Crumlin would find itself located between two bus-gates, and this has led to much local concern that the Crumlin area will see huge increases in traffic and rat-running. I understand the anxiety about this, although I feel the self-mitigating impacts of traffic evaporation may not have been taken into consideration. However, the indirect, cumulative impacts of corridors 8/9 and 11 have not been communicated to residents, nor have possible traffic calming or mitigation measures.

There is very limited traffic modelling data for the area, and inconsistencies in the available modelling data appear to indicate that the impact on the wider community has been underestimated. Residents' Associations and community groups have made detailed submissions, informed by local knowledge and outlining modelling inaccuracies and anticipated problems for Clonard Road, Old County Road, DownPatrick Road, Windmill Road, Kildare Road, Stannaway Road, Sundrive Road and others. It's vital that the NTA engages with residents on these concerns; that submissions from residents are read carefully; that traffic calming and mitigation measures are proposed; and that the all-important aftercare is committed to and budgeted for.

11. Kimmage to City Centre

The proposals to improve the public realm at Sundrive are much-needed and most welcome, particularly the proposal in the revised plans to extend these improvements up to the shopping centre. Kimmage and Crumlin have long been neglected in terms of public realm improvements, and there are vibrant and engaged community groups working off their own steam to improve the local area. I would refer to my previous point on workshoping and consultation, and ask that this occurs not just with existing property and business owners, but also with the wider-community to allow maximum buy-in to inform the final designs for this junction. I note also the additional car parking spaces provided for, and I hope that – since cyclists can still chose the Lower Kimmage Road over the

cycleway - provisions will also be made for secure cycle parking and adequate consideration given to the need for cyclists to use this road safely.

The addition of a proposal for a quietway/greenway is welcome as a means of encouraging less confident cyclists to commute, but every effort must be made to ensure the integrity of the parks remain; that there will be no potential for conflict between cyclists and other park users; and that in an area with a notable deficit of green spaces, adverse impacts on trees or planting should be minimised first and mitigated second. In particular it should be noted that while it is proposed that seven trees will be felled in Poddle Park to accommodate the cycle track, there will be additional tree loss in this park due to proposed Poddle Flood Alleviation Scheme. It is not clear from the information provided what the cumulative impact of the two interventions to the park will be, or what impact the cycle track will have on the improvements to this public space that are proposed as part of the Poddle FAS works.

I note also that Mount Argus Park has benefitted from carefully considered biodiversity initiatives implemented by Dublin City Council. Care should be taken that these measures are not adversely impacted by the addition of a cycle track, and consideration should be given to the fact that the Lower Kimmage Road will remain the preferred route of many cyclists. I welcome the fact that this off-route cycling infrastructure will likely become a popular amenity route, and provide a safe alternative to car journeys for families and school children, but the Lower Kimmage Road must also be made safe for cyclists, and I would ask the NTA to consider also the need for safe school cycling routes in this area - particularly for the Harold's Cross Educate Together, which under the current proposals will remain difficult to access by those exiting the cycleway at the end of Mount Argus Road.

As with other corridors, concerns about the rerouting of traffic remain, along with concerns about a loss of local access and connectivity with the wider community, and I refer to my earlier point that the NTA must commit to and budget for an aftercare programme.

10. Tallaght to Terenure / 12: Rathfarnham to City Centre

The intersection of two corridors at a high-pressure junction in the historic village of Terenure has led to a huge amount of local anxiety about the impact this will have on the safety, usability and connectivity of the village. As an urban village that already experiences high volumes of traffic, I believe that with a degree of traffic evaporation and a modal shift to other modes of transport, there exists the potential to improve the village of Terenure, to instigate a shift away from unnecessary car journeys, and to make the village safer, quieter, more walkable, and more liveable. As it stands, the village centre encourages a large proportion of unnecessary car journeys, and its design is actively hostile to pedestrians, with inadequate pedestrian crossings, a junction dominated by private vehicle traffic, and an ongoing problem with dangerous and illegal parking, despite the presence of multiple large car parks in and at the edge of the village. With the exception of disability access space, there is a clear opportunity to remove some on-street parking and crack down on illegal or pavement parking, and widen the pavements in areas to create a more attractive civic space.

It should be noted though that Terenure has not benefited to same extent as other areas or villages from previous rounds of consultation, and primary concerns which remain unaddressed for residents at this juncture are road widening, tree removal, the lack of public realm improvements proposed for Rathgar and Terenure Villages, the impacts of bus gates including traffic displacement and rat-running, street safety, and the loss of local access and connectivity between Terenure Village, Rathgar Village, KCR and Kimmage.

Many of those concerns could be mitigated at this stage by filling the information gaps which exist, and which are currently being filled with speculation. I would encourage the NTA to engage constructively with residents who have specific concerns about the combined impact of the bus gate at Poddle Park, diversions away from Terenure, and the reduction of Templeogue Road to one-way for private car traffic eastbound causing additional traffic and rat running in surrounding streets and estates such as Greenlea, Lavarna, and Parkmore, along with Fortfield Road and Fergus Road, and again to provide a commitment to and budget for aftercare.

Likewise, the junction at the centre of the village has not yet been fully considered, and this is leading to possibly unnecessary concern about the treatment of pedestrians and cyclists at this point. While plans for an off-route cycle way are welcome, there will inevitably continue to be some bike traffic through the village, and provisions must be made to accommodate this safely and give priority to school routes in both directions to reduce potential conflicts.

The 10/12 corridor designs also provide an opportunity to tackle longstanding mobility and public realm issues in Rathmines, which has become a busy thoroughfare for cyclists despite the pressure the current street design puts on them, and cyclist safety should be prioritised with potential conflicts minimised where loading bays or other obstructions might occur. In Rathmines there is again the opportunity to flip the Hierarchy of the Street in favour of our most vulnerable road users, but concerns about the wider implications for the residential areas of Rathmines should be addressed, with a view to creating quieter, safer streets in adjacent residential areas also. There are concerns, in particular, about the impact on traffic volumes on the Upper Rathmines Road and on Castlewood Avenue as a result of restrictions on Rathgar Road and Lower Rathmines Road. Further clarity should be given on this, and again there must be a commitment to and budget for aftercare.

Concerns also remain that the use of "In-line Bus Stop" designs for seven of the nine bus stops on the Lower Rathmines Road will lead to unsafe conditions for both bus passengers and for people cycling. This kind of design is generally recommended for use where there are low-to-medium bus frequencies, and with two corridors intersecting at Terenure to continue down Rathgar Road and through the village of Rathmines, bus frequency here will be high.

I note also that I share the concerns of some residents regarding the construction of a proposed cycle and pedestrian bridge over the river Dodder at Rathdown Park. Again there is a deficit of information about this proposed element of the off-route cycle track, and significant further information is required, including detailed drawings and costings, and an Environmental Impact statement. I agree with residents that the scale of this bridge would potentially be out of scale for the neighbourhood, and that significant tree removal would be needed to facilitate it, and while the NTA has stated that this structure has a separate purpose to the other bridge nearing completion over the Dodder in Bushy Park, it's not clear to me what this separate function is or what the rationale for a second bridge is.

I know that the residents of Rathdown Park have submitted a detailed submission outlining their concerns and their own drawings, and that cycling campaigners and the Dodder Action Group have also shared their concerns and offered proposed alternative desire lines. I would ask that these submissions be carefully considered and that an alternative to this bridge would be proposed.

Conclusion

As a councillor, I welcome the fact that there has been strong engagement to date on the BusConnects project, and that prior consultations have been progressive and inclusive, and have led to significant changes where the NTA have sought to implement community-driven solutions.

It is unfortunate that Covid restrictions have inhibited the degree to which that consultative approach could inform the next stage of the designs, but this is a project that is vital to the future and the climate-resilience of our city, and we must not miss this opportunity to get it right. I would ask the NTA to continue engaging with communities to ensure this project can be delivered in a way that maximises its potential to transform our city, our villages and our communities for the better.

Kind regards,

A handwritten signature in black ink, appearing to read 'Carolyn Moore', written in a cursive style.

Clr Carolyn Moore

Green Party Councillor for Kimmage-Rathmines