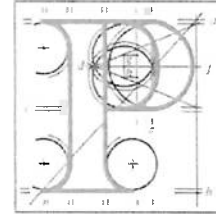


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Richard Carroll
12 Glendown Close
Templeogue
Dublin 6W
D6W KF25

Date: 24 April 2024

Re: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme
Templeogue/Rathfarnham to City Centre

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

If you have any queries in the mean time, 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

HA02

Teil	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Kevin McGettigan

From: Eimear Reilly
Sent: Wednesday 10 April 2024 09:22
To: Kevin McGettigan
Subject: FW: Case: APB-316272-23 Bus Connects Templeogue/Rathfarnham to City Centre
Attachments: 20240328 - ABP Submission ABP-316272-23.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: LAPS <laps@pleanala.ie>
Sent: Tuesday, April 2, 2024 10:09 AM
To: Eimear Reilly <e.reilly@pleanala.ie>
Subject: FW: Case: APB-316272-23 Bus Connects Templeogue/Rathfarnham to City Centre

From: Richard-Carroll <[REDACTED]>
Sent: Thursday, March 28, 2024 4:33 PM
To: LAPS <laps@pleanala.ie>
Subject: Case: APB-316272-23 Bus Connects Templeogue/Rathfarnham to City Centre

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Hi,

Please find my attached my submission regarding the above case.

Best Regards,

Richard Carroll

On Wednesday 13 March 2024 at 15:23:06 GMT, LAPS <laps@pleanala.ie> wrote:

Hi Richard

As explained in the Board's letter to you, the NTA submitted a document in which they responded to all submissions received on this case. You are invited to make a submission in relation to the NTA's response to your submission.

I hope that clarifies.

Kind regards

Eimear

Name: Richard Carroll
Address: 12 Glendown Close, Templeogue, Dublin D6W KF25
Case Number: **ABP-316272-23**
Description: Bus Connects Templeogue/Rathfarnham to City Centre Corridor Scheme
Date: March 28 2024

Submission: Request that An Bord Pleanála reject the Application.

1.0 Introduction.

Historic urban centres often possess unique cultural, architectural and social attributes that must be carefully balanced against the need for sustainable mobility solutions.

Focusing too narrowly on climate change mitigation through transport planning runs the risk of compromising that inherent character and heritage of any area such as in Templeogue, Terenure, Rathfarnham or Rathmines.

While the threat of climate change is a pressing concern, it should not be the sole or overriding consideration in developing a transport plan for an older city.

Unfortunately, there are too many cohorts of well-funded groups activists who will point blank refuse to accept this position. They would prefer to see the destruction of the old because of an unwarranted and instilled fear of the future.

Sweeping changes to accommodate the latest green technologies or transportation modes will disrupt that delicate urban fabric by eroding the very qualities that make these places special, unique, vibrant and active.

The solution requires a blend traditional and modern, drawing on the best elements of human ingenuity of the city stakeholders and also those of the urban designers and planners.

We need to avoid this mono thinking and irrational 'one-size-fits-all' approach but instead, craft a bespoke transport plan that celebrates the unique character of the capitals historic and older localities while catering for modern requirements.

The quality of a plan is not down to the number of people employed on a project, the amount of financing used, the number of pages produced or the number of activists or NGO's used to gain political influence. Rather, it is measured by the plan's ability to thoughtfully and effectively address the unique challenges and opportunities within the confines of the local context in which it has to work.

Ultimately, the mark of a great transport plan for an older city is its capacity to enhance liability, accessibility, and environmental sustainability, while simultaneously safeguarding the irreplaceable qualities that make these city spaces, villages and townlands cherished and revered.

I am therefore against the application in its current form.

2.0 Comments on NTA's Section Replies.

3.235235 – Richard Carroll

3.235.1 Submission – Whole Scheme

The submission raised the following issues:

1. Pre-COVID traffic volumes used in analysis.
2. No assessment of cumulative impact of 12 corridors
3. Inadequate bus service proposed.
4. Proposed bus gates
5. Unnecessary change providing no real gains to bus travel times.
6. Compulsory purchase order

3.235.2 Response to submission

Detailed responses to the issues raised by this submission have been provided in Section 2.1.1 of this report.

2.1 Section Comments regarding NTA response of Dec 20th 2023.

2.1.1.1	<p>Nobody is denying that changes are needed but this approach is ill-considered, hugely wasteful so far and all for no real tangible or user perceptible benefits in shortening journey times.</p> <p>Just by spouting magic words like 'sustainable', 'Active Travel', 'climate change' or 'Improve the Public Realm' isn't enough to justify the shambles that is being proposed.</p> <p>Imposing additional poor urban planning on top of all the previous poor attempts at planning and design, such as with the citywide implementation of bicycle lanes, is not a solution.</p> <p>Jarret Walker, the initial U.S. based consultant, was given such a narrow brief, it was never going to deliver a proper solution when so much was omitted.</p> <p>Buses are NOT the only mode of transport. No matter how fancy the NTA dress it up with graphs, sheets and maps, the proposal will NOT meet the needs of the expected population by 2040.</p> <p>There have been plenty of technical submissions regarding this application and many other reports over the years regarding other transport plans in general and all have come to the same conclusion. Yet the NTA have ploughed everything they had in to a one-sided CBC solution.</p> <p>All the enhancements are for Bus travellers or cyclists. What about the vast majority who are not cyclists or bus travellers? Why are they being excluded? Is it minority rules?</p> <p>On the subject of population, the global population fell for the first time in 700 years. The Irish fertility rate of 1.4 is well below the 2.1 figure for natural replenishment and this is the case across most of Western Europe.</p> <p>This will have serious medium- and long-term consequences for Ireland causing a demographic imbalance and a declining working population with all the associated issues that that entails.</p> <p>Are the NTA figures for the population growth then based on immigration only to reach those projected values by 2040?</p>
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2.1.1.2	<p>These are all lovely aspirations. But that's all they are. Aspirations. And based on false data.</p> <p>Regarding the better use of land, it appears that the only policy being followed is to plant bicycle or bus lanes on every bit of tarmac that doesn't have one.</p> <p>What about people who cannot walk or cycle and would also have difficulty in getting to or taking a bus?</p> <p>Does the NTA actually believe that the vast majority of the capital's population can, and will become active travellers?</p> <p>It is absolutely outrageous that the NTA (and by extension An Bord Pleanála if they pass the application as is) could even countenance such a one-way shift. This is not a modal change to enhance, but a policy change to deter.</p> <p>Am I also right in believing that diagram 6.50 is suggesting that after all this effort and substantial costs, the benefit it will deliver is a shaving (and that's all it is, a barely imperceptible) 0.8 to 1.1 minutes off a particular outbound bus journey time? Are the models and data set used so accurate that it can determine future bus times down to fractions of minutes?</p> <p>What affect then will all of these CBC's (and bicycle lanes) have on car, delivery van and other vehicle journey times?</p>
2.1.1.7	<p>A bus and bike-only system will NOT provide adequate coverage or accessibility for all members of the community, particularly those with limited mobility or with heavy/bulky goods to transport. This is an exclusionary policy.</p> <p>The NTA has seriously mis-calculated the number of buses required (too low) and the changes they are proposing are designed to stop other modes of transport from taking up the slack.</p> <p>So, what happens to those prospective passengers who are left behind at the bus stop because their modelling calculations are wrong? Those very same plans which are supposed to enhance movement, have made it nigh on impossible for those left behind to consider using a car for example.</p> <p>It has to be clearly evident that by replacing an imperfect system with one that's worse, is not sustainable and it'll make life more difficult for a whole swathe of the capitals demographic.</p> <p>Are they taking account of and are they integrating the CBC's with other modes of transport such as the Luas or Metrolink? They haven't and by pushing out any such considerations for the Luas beyond 2042 for example, means they are neglecting their duty by not planning for a fully integrated transport solution.</p> <p>This doesn't sound like a plan. It sounds like an instruction.</p>
2.1.1.9	<p>The NTA seems to have supreme confidence that all twelve corridors will be approved by An Bord Pleanála even though all twelve corridors were applied for separately.</p> <p>Their view of a multi-tier transport system appears to consist of buses and bikes only.</p> <p>Buses and bikes have a finite capacity which can be quickly overwhelmed during peak travel times or on the occurrence of large events.</p>

	<p>While dedicated bus and bike lanes are important elements of a comprehensive and sustainable transport strategy, they are not feasible or suitable in all areas, particularly in established older cities with limited road space and complex infrastructure. Such as along the Templeogue/Rathfarnham corridor.</p> <p>There are too many narrow streets and roads along the route to accommodate new bus and bike lanes together with current traffic flow but by forcibly removing other modes of transport to implement those lanes, it will lead to future severe and unintended consequences.</p> <p>We can all immediately see the disastrous and cumulative negative effects due to the implementation of widespread, and mostly underused, bike lanes located all over the GDA. BusConnects will only make it worse.</p> <p>Only a solution like MetroLink or Dart, in conjunction and buses, bikes and automobiles, can deliver the necessary capacity required especially in Dublin South West.</p> <p>The lack of a comprehensive multimodal network will make the system less attractive and less convenient for users.</p>
2.11.12	<p>Cities all over Europe have lost a lot of their original character and architectural fabric by inconsiderate town and urban planning and design. There needs to a harmonious balance between preserving the old and embracing the new.</p> <p>While integrating modern infrastructure can improve the overall functional and sustainability of older cities, proper consideration and coordination must be afforded to minimise disruptions and visual intrusions while maintaining its historic value.</p> <p>The temptation to pursue sweeping, large-scale changes in the name of progress or environmental imperatives can often come at the expense of the very features that make these places special and worth preserving in the first place.</p> <p>Dublin is an old city with streets which were never meant to take bus, cycle and car lanes together. By removing trees, paths, gardens, walls and buildings, whether through CPO or not, it is the beginning of the destruction and removal of that old city fabric.</p> <p>So much unnecessary destruction of old Dublin has already taken place and in forty years' time, when some new technology arrives that may negate any perceived advantages that Bus Connects appears to offer now, we will not be able to revert to or recover that old lost city.</p> <p>Putting up forests of Maple, Birch or Elm trees along the route to hide that destruction is not the solution.</p>
2.1.1.15	<p>Regarding the economic and social aspect of the transport strategy, this would make sense if the plan consisted of a diverse transport system that also took other options into account such as the Dart, Luas, MetroLink and automobiles for example. It doesn't.</p> <p>It is only when this level of integration is met, it then be reasonably safe to suggest and assume that this enhanced connectivity would lead to increased economic productivity and better access to employment opportunities plus all the benefits that accrue.</p>

	<p>The only multi-faceted aspect of the CBC's is that there are the twelve corridors which will reduce capacity on the roadways of Dublin to the tune of 230km worth of bus and 200Km worth of cycle lanes.</p>
2.1.1.16	<p>If any number of those twelve separate CBC corridor applications were to be rejected by An Bord Pleanála for any reason, then it wouldn't have any impact on any corridors that are left?</p> <p>The project is challenging enough but by project-splitting, it has now become a more fragmented approach because the focus of the final output has been handed over to each individual corridor sub-project rather than the strategic goals of the larger initiative.</p> <p>By taking each corridor separately, the massive changes being forced (CPO's, no right or left turns, bus gates, one-way blocks etc) and the massive impacts that these will have, are being looked at per-corridor and dealt with separately.</p> <p>Now take all of those proposed changes over all of the twelve corridors of the GDA and in conjunction with the massive disruption already suffered by the 200Kms of cycle lanes that have already been implemented so far, the whole system will grind and may even collapse.</p> <p>It is not easy to simplify complex urban transport systems where there are a lot of moving parts made up of interacting factors such as travel behaviour, infrastructure, land use and socioeconomic dynamics for example.</p> <p>It doesn't matter how good they believe their modelling is, they will struggle to fully capture this complexity leading to inevitable oversimplification or an inaccurate representation of reality.</p> <p>Those models are often based on historical patterns and trends so may have difficulty in anticipating and accounting for new disruptive changes, such as the rise of new mobility technologies, shifts in consumer preferences or unexpected events (e.g., pandemics).</p> <p>Besides, their transport plan appears to be over focussed on travel times while neglecting the broader environmental, public health and the social equity impacts of transportation systems.</p> <p>I would also suggest that their transport modelling efforts in conjunction with their project management approach have, since the start, lacked any meaningful engagement with a number of the diverse stakeholders such as community members, residents' associations and advocacy groups.</p> <p>As we can see, this has led us to a point where the proposed solution does not adequately reflect the needs and perspectives of all the affected parties and the reason why there are so many submissions of objection to this application.</p> <p>I believe there is a disconnect between the theoretical assumptions and parameters used in transport models and the actual travel behaviour and decision-making patterns of individuals and households.</p> <p>So when all of this is implemented in parallel, it can only lead to disastrous effects on all traveller types throughout the GDA. It will be akin to a blood-transfusion overload being administered leading to very serious consequences.</p> <p>Is there a contingency, backup plan or funding put aside to revert when all of these changes collapse and brings everything to a grinding halt?</p>

3.0 Final Overall Comments.

I believe the application is flawed because of the following observations:

1. It was based on a vague and inadequate brief which led to a narrow project scope.
2. It amounts to a substandard form of urban mobility design because of the limited project scope.
3. Critical and essential information was omitted.
4. Project was allowed to proceed without reliable input data.
5. The scheme is therefore excessively Bus and Bike dependent.
6. The scheme is overly dominant on Buses.
7. The public was misled and when feedback showed legitimate concerns, it was wilfully ignored.
8. That highlights a lack of foresight in its project management with an absence of accountability.
9. Previous studies have shown that buses alone cannot provide the necessary capacity.
10. Buses and bikes are not the only viable options for modern mobility.
11. Buses and Bikes are the only elements likely to see enhancements due to this plan.
12. Some of the modelling output results used in the report seem very far-fetched.
13. Too many road closures such as in Templeogue, Rathmines, Lr. Kimmage.
14. Busgate on Templeogue Road, its hours of operation and serious side effects.
15. They cannot show conclusive proof that BusConnects will actually reduce journey times.
16. They seem to expect that the very young and the elderly will become 'Active Travellers'.
17. They also seem to expect people with mobility or disabilities to do the same.
18. It breaks NTAs own project tenants - 'Better connected communities' and 'enhanced quality of life'
19. This is not a modal change to enhance transportation, but a policy change to deter it.
20. It is Deficient in its objective as it will cause more problems than it solves.
21. The scheme doesn't meet the Public's requirements only the NTAs.