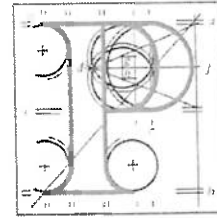


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Stephen Woulfe
15 Victoria Road
Rathgar
Dublin 6

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
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Kevin McGettigan

From: Eimear Reilly
Sent: Monday 8 April 2024 12:36
To: Kevin McGettigan
Subject: FW: Further observations on ABP-316272-23
Attachments: bus connect ABP further observation.pdf

From: LAPS <laps@pleanala.ie>
Sent: Thursday, March 28, 2024 9:50 AM
To: Eimear Reilly <e.reilly@pleanala.ie>
Subject: FW: Further observations on ABP-316272-23

From: Stephen Woulfe [REDACTED]
Sent: Thursday, March 28, 2024 9:35 AM
To: LAPS <laps@pleanala.ie>; Stephen Woulfe [REDACTED]
Subject: Further observations on ABP-316272-23

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.

Dear Ms Reilly,

Many thanks for your letter dated February 23rd inviting further submissions. Having reviewed the materials submitted by the NTA, please find attached for consideration an outline of my continued concerns and a request for an oral hearing.

Regards,

Stephen

Sent from my iPhone

Stephen Woulfe,
15 Victoria Road,
Rathgar,
Dublin 6

27th March 2024

To An Bord Pleanála : Ref 316272

Further observations on NTA response for Bus Connect

Having reviewed the responses to the initial wave of objections and observations, I remain both concerned and frustrated by the proposal and the manner in which the project team treats the general public.

In relation to my specific concerns raised, while an attempt has been made to connect some of their responses to my objections, they did not do so comprehensively, indeed in some cases not at all. See details below. In light of the lack of the issues being coherently addressed it is surprising to learn that there has not been an oral hearing arranged. Such an oral hearing would more reasonably facilitate a challenge process of the project team by reasonable objectors with articulate questions which remain unanswered or have been skirted around to avoid speaking about the negative aspects of the project.

Public infrastructure projects have beneficial aspects for many, but also negative aspects for others. The decision to progress with such infrastructure projects should seek to reasonably balance these imperatives, but to do so there needs to be an open discussion on both the beneficial and negatives aspects, not just a PR campaign on the benefits.

An oral hearing would provide such debate, so should be arranged.

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Basis of continued objection following submission of responses:

In general, the response to the numerous objections, in my opinion, falls short in terms of satisfactorily addressing or refuting the points raised. Broadly speaking, while I appreciate that the Bus Connect project is seeking to trigger a “bus infrastructure” project, many of the issues raised are beyond the remit, or indeed goal orientated focus of the project team, and therefore remain either unanswered, or have been responded to in a blinkered manner reflecting their binary objectives.

There is an onus on projects which are being implemented for “public good” to take a step back when challenged on that measure and reassess if the project, as a whole, is delivering on this important concept of “public good”. While ABP may not be the public body to provide the answer or justification in the public good concept, it is an important public body to safeguard our interests that this concept of public good has been adequately addressed in large scale infrastructure projects put before it for consideration and should reject proposals which fall short in this regard.

On this basis, as the proposal falls short in terms of adequately and in a balanced way considering the general concepts of public good, I request An Bord Pleanála rejects the applications. In doing so ABP should request the responsible state bodies to undertake a comprehensive review of the transportation long-term needs of the city, removing the blinkers of being anchored to the concept of busses, taking into consideration in a more complete manner the implications on the quality of life of residents, the integration with other strategic objectives (such as the 15 minute city), adopting a modelling approach appropriate to Irish modalities (rather than USA modalities) to better implement a positive solution, supporting citizens.

My submission areas:	The responses to my submissions summarised below:
1. Inaccurate and misleading information intentionally provided in the submission	<ul style="list-style-type: none"> - There is a poor attempt to misdirect with the response. Highlighting information that has been shared does not address the fact that many aspects of the information are misleading, or presented in a manner which seeks to create an impression that reasonable questions are invalid, when they are valid and not addressed. - Failing to address this point merits further consideration, including a potential oral hearing or outright rejection of the proposal.
2. Flawed modelling approach	<ul style="list-style-type: none"> - Commented upon, however the focus of the rebuttal is on the outcome of the modelling, not the flawed inputs to the modelling, so fails to address the specific concerns raised. - Failing to address this point merits further consideration, including a potential oral hearing or outright rejection of the proposal.
3. Lack of coherence to long-term strategic objectives of the state	<ul style="list-style-type: none"> - Attempted to be addressed, but not in a coherent way considering the broad perspectives and in a blinkered pre-determined way reinforcing the impression that alternative options were not properly considered, nor revisited considering changing ways in which people live, more anchored on local urban villages. - Failing to address this point merits further consideration, including a potential oral hearing or outright rejection of the proposal.
4. Failings regarding delivering on the key concept of “public good”	<ul style="list-style-type: none"> - This point is not touched upon at all. There is a clear lack of understanding in believing that an articulation of “benefits” translates to “public good” when this is not the case. - Failing to address this point merits further consideration, including a potential oral hearing or outright rejection of the proposal.
5. Poor and unfair public consultation process	<ul style="list-style-type: none"> - This point is covered in some detail. While I may not agree with all the elements of their assessment, it has been covered in a manner which allows for your consideration in the context of arriving at your decision.

Inaccurate information:

There has been no reference made, acknowledgement of or rebuttal of my articulation that inaccurate and misleading information has been used. Does completely ignoring the issue raised imply they cannot rebut my point?

Flawed modelling approach:

The responses to the challenge to the modelling approach has for some reason focused on the outcomes of the models rather than the inputs. The focus of the response is on the people movement analysis rather than assumptions underpinning these. The outcome of a model “is what it is” so to speak, but the anchoring of how the outputs have been arrived at is determined by the inputs and assumptions being used.

Repeated articulation does not address the underlying issue and question, that is, have the appropriate modelling assumptions being used, with an appropriate model, which can take due consideration of localised factors as they relate to Dublin city. This question has not been addressed.

In addition, the rebuttal of arguments that a holistic consideration has been taken are misleading, indeed some elements of the response reinforce the point that due consideration of aspects related to “public good” have not been taken into consideration.

Page 22 in some ways highlights the flawed nature of the strategic approach to the modelling, which appears to have a predetermined mode of transport, highlighted on page 21, with the focus of studies of bus transport, not on identifying the most appropriate mode of transport.

The tone of the response comes across poorly, and while of course there is a need to rebut challenges, doing so through such a narrow lens, without openly considering the merit of such challenges, and how indeed alternatives could be reasonable solutions with the potential for an improved delivery on the overall concept of public good, adopting a better balance, would have been a better approach, more in keeping with that of a public body implementing a public infrastructure project.

Additionally, on page 23, the rebuttal of some alternatives, dismissing them by referencing projections for the volumes of public transport users seems at complete odds with the known fact of the significant underestimation of projections for the Luas system.

Furthermore, on page 26, modelling appears to highlight that the considerations were only in “*maximising the people movement capacity of the proposed section*”. In doing so it provides confirmation it failed to consider all the other movements of people in the ordinary course of daily lives, the vast majority of which are not on the proposed section being considered, nor ever will be.

Lack of coherence to long-term strategic objectives:

There is an attempt to address this point, but not in a coherent way. The response falls short by not considering the broad perspectives and comes across as being in a blinkered pre-determined way, reinforcing the impression that alternative options were not properly considered, nor revisited considering changing ways in which people live, more anchored on local urban villages. As mentioned above, the articulation of the justification for the modelling on bus strategy was to the detriment of considering the long-term strategic objectives of the GDA and the country as a whole. Such long-term strategic objectives have of course (thankfully) the creation of a coherent environmentally considered public transport infrastructure. Such long-term strategic approaches by their nature need to be anchored in the delivery of the objective, in this case functioning public transport, but should be flexible and adaptable within the context of that strategy to employ the appropriate sub-elements.

The failure in this case is the lack of coherent understanding that whereas a bus corridor under the umbrella of bus connect may be the most appropriate solution in one part of the city, it does not imply that all spurs of the infrastructure should be addressed with this same sub-strategy.

From a strategic perspective the failure to have appropriate checks and balances, taking due consideration of factors such as external challenge, broader socioeconomic (i.e. what was possible politically and financially post the financial crisis should not bind us strategically now) societal changes (i.e. workforce, demographics and technology) and local strategic policy implementation (e.g. 15 minute city) has created this unfortunate situation of a proposal which is not appropriate 20 years after initial consideration.

Failings regarding delivering on the key concept of “public good”:

This point is not touched upon at all. While the response sought to reiterate what the project team believe are the benefits to the project, a benefit in isolation is not a balanced consideration of public good.

In all public infrastructure projects, there is (or should be) a clear understanding that not all members of the public will equally benefit, and indeed for some there can be aspects which are negative, with degrees of positive and negative impacts along a spectrum. However, in my opinion there is a lack of understanding that an articulation of benefits translates directly to be a public good when this is not the case.

To consider the overall public good aspects the negative implications should be openly acknowledged and understood, rather than has been the case with this project, an attempt to minimise or sweep under the carpet.

The vast majority of the population along the route in question will not use the bus connect system on a day-to-day basis. On completion it will not address their day to day needs. To be clear, this is not a criticism of the route map, this reflects the day-to-day movements of the population as they go about their daily activities, be that going to school, sports, work, family engagements, accessing essential services or leisure activities.

My criticism lies in the air-brushing out of all these other key stakeholders from the analysis and failing to understand the implications on their day-to-day lives.

In responding to the criticism on the modelling highlights this issue when it states: *“When both schemes are operational (as well as all other proposed Core Bus Corridor schemes), this has the effect of constraining the opportunity for traffic to displace onto adjoining / adjacent roads when compared to the effect when only one of the Core Bus Corridor schemes is operational.”* There is no consideration of the fact that most daily local movements cannot be addressed by public transport, yet the proposed infrastructure openly states it will curtail their ability to undertake this movements by private transport. There are also some contradictory aspects between schemes which raises questions on the wider consideration of people movements more broadly in and around the urban villages along routes.

Poor and unfair public consultation process:

While there has been an articulation of the consultation process in the response, the overall process itself fell short of a reasonable consultation for such a highly emotive topic with a significant volume of technical aspect which needed due consideration. It is unreasonable to expect the vast majority of the public to have access to these technical skills, which has been compounded by the nature of the communication strategy and “divide and concur” approach to the planning applications.