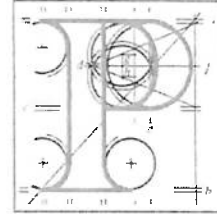


Our Case Number: ABP-316272-23

Your Reference: Terenure & Templeogue Sustainable Community



**An
Bord
Pleanála**

Professor Austin Smyth
Transport Analysis & Advocacy Ltd
c/o 21 Kings Road
Belfast BT5 6JF
United Kingdom

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
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Riomhphost	Email	bord@pleanala.ie

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

Kevin McGettigan

From: Eimear Reilly
Sent: Wednesday 10 April 2024 09:23
To: Kevin McGettigan
Subject: FW: Re Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme Further Response in response to invitation dated 23rd Feb
Attachments: Follow up TAA Submission on behalf of Terenure Templeogue SCA v2.pdf
Importance: High
Follow Up Flag: Follow up
Flag Status: Flagged

From: LAPS <laps@pleanala.ie>
Sent: Tuesday, April 2, 2024 10:13 AM
To: Eimear Reilly <e.reilly@pleanala.ie>
Subject: FW: Re Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme Further Response in response to invitation dated 23rd Feb
Importance: High

From: [REDACTED]
Sent: Thursday, March 28, 2024 5:27 PM
To: LAPS <laps@pleanala.ie>
Cc: [REDACTED]
Subject: FW: Re Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme Further Response in response to invitation dated 23rd Feb
Importance: High

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Cc: [REDACTED] an'
Subject: Re Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme Further Response in

response to invitation dated 23rd Feb

Importance: High

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3. Traffic Redistribution
4. Road Safety

5. Rathmines Road Bus Gate
6. Access to amenities
7. Elderly and Disability Access
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15. Request for additional studies/reviews to be undertaken'

Of these they deal with four, **as highlighted**;

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point 14 (robustness in business case) and

point 15 (further studies).

We have decided to reply in two parts, the first dealing with matters not responded to at all (insofar as we can see) and the second dealing with the 4 points to which they have responded directly.

In relation to Issue 10, the NTA acknowledges that there is an error in Section 3.3.2.1.2 of Chapter 3 of the EIAR which refers to Option S2-20. This should refer instead to Option S2-10. "To determine the impact that the Proposed Scheme has on modal share in the direct study area as a result of its implementation, the weighted average number of people moved by each mode (Car, Bus, Active Modes) has been extracted from the ERM / LAM. The analysis compares the Do Minimum and Do Something scenarios both in the inbound and outbound direction in the AM and PM peak hours (8-9am, 5-6pm) for each forecast year (2028, 2043). As outlined previously, the same demographic assumptions (population, employment levels) are included in both the Do Minimum and Do Something scenarios. The bus network and frequency assumptions are also the same in both scenarios and are in line with the BusConnects bus network proposals. **It is acknowledged, therefore, that the assessment is conservative in terms of the level of people movement that is predicted in the Do Something scenario.**

The implication of this is that in their response fail to address the issue of our arguments about unprecedented growths in travel and the inability of the transport system including buses to cope

with such demands and the consequences that has across that sector of the city and into the city centre.

In relation to Issue 13, the NTA is satisfied that the transport modelling carried out to inform the design and assessment of the Proposed Scheme, as extensively documented in Chapter 6 of the EIAR and its associated Appendices, is robust.

This is simply a bald statement without any evidence to back up the claim in the statement and therefore fails to address our observations made re. points subsumed into issue 13.

In relation to cycling trips, the following is noted in Section 6.4.6.1.8.1 of Chapter 6 of the EIAR: "The Proposed Scheme will facilitate a step change in the level of segregated cycling provision in comparison with existing conditions along the entire length of the corridor. The transport modelling is conservative in terms of the predicted cycling mode share. This is misleading. Their focus is on supply of space for cycling. There is no robust demand modelling of cycling employed in support of their case.

In relation to Item 14, all major publicly funded infrastructure projects, such as the BusConnects Infrastructure Schemes are subject to the Public Spending Code (gov.ie - The Public Spending Code (www.gov.ie)) which requires the production of appropriate economic appraisals and business cases. The Preliminary Business Case for BusConnects schemes is set out at the following link. The document sets out the keys costs and benefits of the schemes.

This PBC refers to the overall business case for the BusConnects programme across all corridors but not specific to each corridor. Each will demonstrate its own performance and it is assessment of that performance for this corridor we are referring to in our submission. It is anticipated to be one of the poorest performing schemes within the overall BusConnects programme.

In relation to Issue 15, the NTA notes that comprehensive studies and analysis have been undertaken to inform the design and assessment of the Proposed Scheme. The requirement or otherwise for additional reviews is a matter for An Bord Pleanála to decide. This is an important consideration for An Bord Pleanála in arriving at its decision.

Furthermore, the failure to address the other specific points we have made that the NTA itself has grouped into 11 other arbitrary categories demonstrates lack of respect for a challenging submission when compared to other submissions, for instance on selected largely supportive cycling submissions that are given extended coverage in their replies.

We submit NTA should be asked by you to reply point by point to the observations we made and highlighted in our 'yellow boxes' in the submission, so that An Bord Pleanála has all the responses to hand and you should defer any decision until they do so.

It would be entirely normal practice that points are responded to in the same order as they are made and the way NTA has tackled this is contemptuous of the process over which An Bord Pleanála presides.

Points not responded to at all by the NTA encompass the following. These are numerous and include (page numbers from our original submission)

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Many of these points appear in several parts of our submission for different areas and the list is not exhaustive.

In the case of points 1 to 6 we can only submit to you that their lack of response is an acknowledgement that what we say is correct and you should proceed accordingly. For most of the points, we have to infer that they are unable to answer and to justify key aspects of their scheme.

We think it is unsatisfactory in the extreme that no oral hearing is to be held as this would seem to be the only route to extract reasoned explanations from NTA of any of these points. We respectfully ask that you consider this decision again or find some other mechanism to extract answers to which we can respond to the important issues raised.

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