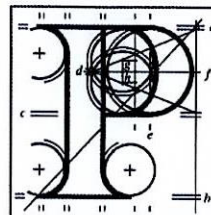


**Our Case Number:** ABP-314056-22



**An  
Bord  
Pleanála**

Brendan Heneghan  
88 Parkmore Drive  
Terenure  
Dublin

**Date:** 26 September 2022

**Re:** Liffey Valley to City Centre Core Bus Corridor Scheme.  
Fonthill Road to High Street all in the County of Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above 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 be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

BL50A

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## SUBMISSION ABP LIFFEY VALLEY SCHEME

I would like to make a submission on four points related to this scheme

- 1 bus gate at St James Hospital
- 2 unsubstantiated claims re time saving
- 3 construction closures
- 4 the consultation process

### **Bus gate at St James Hospital**

The maps at "General Arrangement" maps 24 and 25 of 28 indicate that there is to be a bus gate at James's Street at the entrance to St James Hospital. The suggested operation times are very difficult to read, with a crazy small print size for a really important bit of information.

However it seems the proposed hours are

06.00 to 10.00 Monday to Sunday city bound except buses and bicycles

16.00 to 20.00 Monday to Sunday Kilmainham bound except buses and bicycles although it may be that this applies to a left turn ex the Hospital only

As I had a discussion with Mr Cregan of BusConnects in the context of bus lanes about 07.00 being too late and 19.00 being too early for these to expire. I would broadly favour the 06.00 and 20.00 concepts. In particular a 06.00 to 10.00 stops commuter traffic easily accessing the city in the morning and therefore it is simply not there to return in the evening. However I think there is zero justification for any ban at 06.00 to 10.00 on Sunday. I also believe that other bans on both Saturday and Sunday should not be permitted, although I would concede that Saturday evenings can be problematic.

I would be concerned that the Bord should not confuse the hours of operation of bus lanes, where there is another lane open to general traffic and bus gates where general traffic has to take a long diversion. At quiet hours the traffic can drive in the general lane, so there is no benefit being able to drive in the bus lane.

I would also ask you to consider whether any PM ban is required at all in the light of my observations on time saving.

I think it should be a specific condition of the planning consent that these hours of operation cannot be extended without seeking further specific planning approval.

The principles established here should also be applied as maximum hours to other schemes which force long diversions for general traffic.

### **Unsubstantiated claim re time savings**

It has always been my understanding that the fundamental basis for constructing these corridors is that it would result in a time saving for buses and that it would produce a more predictable variation between the slowest and fastest bus. The claim asserted in all the brochures related to this scheme are that the current journey time is up to 65 minutes and that the bus journey time can be reduced to 30 to 35 minutes.

This assertion is wholly inconsistent with the tables on pages 95 and 96 "Traffic and Transport" regarding outbound direction, where the most extreme time range asserted is 26.1 minutes to 36.1 minutes outbound doing nothing as opposed to 23.9 minutes to 30.2 minutes where measures are taken. This suggests to me that the slowest bus can get there in 30.2 minutes, as opposed to 36.1 minutes now, a time saving of less than 6 minutes. The differences at the average level are of the order of 3 minutes. It begs for me the question of any measures being needed outbound.

On the inbound direction the gaps are bigger (page 91) with a range of 28.4 to 44.8 suggested as opposed to 24.3 to 30.6 minutes with corridors in place. However these figures are still nowhere near the claim of 65 minutes asserted in the documentation to date.

I should also say that a suggested deviation of between 4.1 minutes (24.6 to 28.7) and 6.7 minutes (23.9 to 30.6) seems very ambitious having regard to all the variables that cannot be eliminated.

This is the first corridor I have looked at where the upgrade to bus corridor (I think they mention a current 26% somewhere) is very significant. I am somewhat surprised at the modest time savings, which seem similar to the first two corridors (Clongriffin and Blackrock) where bus lanes are largely in place already.

Very substantial inconvenience will be occasioned to many people by this corridor. The submissions you receive will show the extent of them. You need to weigh up whether the minimal time savings that they are now asserting justify the inconvenience. It is entirely unsatisfactory that a process has been run on the basis of halving the time, when in fact the time savings are much lower than that.

It is notable that there appears to be no document filed with you backing up alleged qualitative research that journey times are really important to the public. For my part issues such as the bus coming regularly (with no missed buses) and having capacity to let me on are much more important factors.

### **Construction**

I was shocked to learn recently that the North Strand is being closed inbound for a very significant period of time to construct a single bicycle lane. If this is needed for a single bicycle lane, I find it difficult to believe that what seems to be asserted in the document about limited construction related problems can be correct.

### **Consultation process**

While the documentation comes with an over 600 page report entitled Public Consultation Report 2018 to 2022 in the Supplementary Information Section, I think the bald reality is that there has been completely inadequate public consultation on a very complex project particularly at Stages 2 and 3.

A significant part of the consultation is with the so called community forum. This consisted of a maximum of two persons from residents and community associations, disability and special interests groups and business organizations on the corridor, as well as public representatives. If you were to get any consultation at all in stage 2 or stage 3, you had to be one of those exalted people. If the level of redactions of attendees in the report is considered there were

38 attendees on 13 February 2019

32 attendees on 2 October 2019

25 attendees on Monday 23 November 2020 18.30 to 20.00 (page 528)

In the case of the 23/11/20 meeting only 6 days notice was given (despite a promise of 7). By contrast the notice for the meeting on 2/10/19 was given on 12/9/19.

At the community forum three questions were taken at a time and they were answered as a "job lot". No opportunity was given to come back in.

There were a mere 6 meeting with 4 residents groups (see pages 532 to 535)

CIE Works Estate x 2 27/3/19 and 9/7/19

Mount Brown Residents x 2 13/11/19 and 21/10/20

Inchicore Regeneration 09/04/19

Liffey Valley Residents 4/12/20

There was a single public meeting open to all on 28 February 2019.

So in summary

*Stage 1 23/1/19 to 30/4/19*

Public meeting

Community forum 13/2/19

2 residents meeting

135 written submissions

*Between Stage 1 and Stage 2*

Community forum 2/10/19

2 residents meetings

*Stage 2 (4 March 2020 to 13 April 2020)*

No meetings whatever

39 submissions

*Stage 3 (4 November 2020 to 16 December 2020)*

2 residents meetings

Community forum 23 November 2020 with very short notice and electronically

221 submissions (or possibly 86 if Jacobs 1.6.3.3 in Introduction page 24 is correct)

It would be my contention that this is wholly inadequate time devoted to a project of this complexity.

A very unsatisfactory aspect of all of this is that changes were made to this scheme and all of the others after stage 1. Unless you were in the loop of the community forum, you were not really able to engage on any changes other than by a written submission. Further those phases overlapped with the worst periods of Covid, when people presumably had other greater worries. At stages 2 and 3, there was little opportunity for persons not computer literate to participate.

Further before the stage 1 process ever kicked off, all sorts of options were taken off the table. Most notable an option identified in their map 18 of 28 "tie into Lucan to City Centre CBC Scheme" was discarded, despite the fact that this would get Ballyfermot to Palmertown commuters to town more directly. It is notable that areas to the city side of this point are quite close to Luas or walkable/bicycle distance from town. I think you should consider that option as no doubt by the time you decide this matter, the Lucan application will have been lodged.

It is my contention that these consultation deficiencies are not consistent with many provisions of the Aarhus Convention 25 June 1998 and the Kazakhstan advice issued in connection therewith (ACCC/A/2020/2) at the height of Covid and in particular

The Article 6.4 requirement that "all options are open"

The Article 6.3 requirement for reasonable time frames, which is hardly fulfilled by consultations at the worst Covid periods and inadequate notice

Material meetings being largely confined to Community Forum and Residents Groups which is hardly public participation as envisaged by Article 6.

No evidence of a "needs assessment" as required by paragraph 26 Kazakhstan

No additional means of notification as required by Article 33 of Kazakhstan

No posting or mobile phone messages as suggested by Article 34 of Kazakhstan, despite the fact that delivery of leaflets door to door was possible during Covid and post was not affected.

No extension of time frames as suggested by Article 38 of Kazakhstan. In fact the timeframes for the Covid stages are much shorter than stage 1

No alternatives for persons lacking access to technology as required by Articles 49 and 50 of Kazakhstan.

I would submit that in your decision you need to consider whether the failure to comply with Aarhus and Kazakhstan at stages 2 and 3 is so material that a further period of consultation be directed. It is my position that further consultation is warranted. The "Public consultation" document submitted suggests the process began in May 2017, so we are already over 5 years into the process.

I have in another submission requested a public hearing in the Aarhus/Kazakhstan context and I repeat this request in this context.

Brendan Heneghan

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September 2022