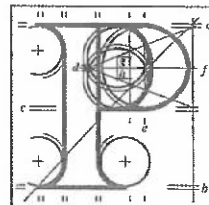


Our Case Number: ABP-316828-23



An
Bord
Pleanála

Brendan Heneghan
88 Parkmore Drive
Terenure
Dublin
D6WX657

Date: 25 July 2023

Re: Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.
Tallaght/Clondalkin to Dublin City.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) 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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA02

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SUBMISSION RE TALLAGHT CLONDALKIN CORRIDOR REF 316828-23

AN BORD PLEANÁLA	
LDG- <u>064756-23</u>	
ABP- _____	
30 JUN 2023	
Fee: € <u>50</u>	Type: <u>Other</u>
Time: <u>15:18</u>	By: <u>Hand</u>

This is a submission re the proposed Tallaght Clondalkin corridor.

I should say at the outset that in making a decision on this corridor, the Bórd should have regard to key background factors including

1 the fact that in substance there are no extra buses provided on this corridor in the BusConnects plans (being rolled out at tortoise speed; five of thirteen spines in five years) above the existing services

2 the taking away of bus services from the estates to either side of the corridor in the Crumlin area

3 the current failure of the NTA and its contractors to deliver even the bus service that is in the timetable. My recent experience is that services 15A and 54A that have a twenty or thirty minute frequency in the timetable often have a bus missing, so that the service gap is forty minutes or an hour. As a frequent bus user, I say this problem is getting far worse now than it was six months ago. NTA seem to take no effective action, so complaining is useless.

4 the difficulty on getting on buses if you live in a City Council location, which is a primary reason I and (I suspect) many others are reluctant to rely on buses.

5 the lack of reliability of real time information. This is promised under BusConnects "New bus stops and shelters" still not implemented five years into the programme

6 the relatively minimal time savings achieved on journey lengths. I am strongly of the view that these time savings are not a commuter priority, as opposed to resolving points 2, 3, 4 and 5. The buses on this spine are ultimately destined for Clongriffin area and in the aggregate the time saving is modest (there is a city centre black hole of information).

I should also say that my ability to make the sort of submission that I would like to has been materially prejudiced by an eight week timescale overlapping with another local corridor. The documentation by NTA's choice is 5,000 pages long (while omitting vital information) and takes ages to read. If they proposed an eight week timescale they ought to have been asked to shorten the application and to provide a proper "Non Technical Summary".

It is my core submission that this application lacks the information on a number of vital issues particularly around the issues identified at 2, 3 and 4 in the next paragraph. I therefore submit you should remit the application to NTA with a request that they deal with these issues properly and only then process the submission.

While in principle, I have no particular difficulty with the concept of this corridor, I have four significant reservations

1 the appalling consultation process, particularly in Drimnagh and Crumlin

I think it is premature of NTA to seek planning at this stage and that further consultation is needed. I believe rather than proceeding to make any decision, you should direct NTA to now consult widely across all areas within the study area (as identified in their traffic projections). They need to issue bespoke letters, which detail specific measures proposed by area (such as new cycle lanes, bus stop moves and road closures) and which flag to affected roads particularly in Crumlin and Drimnagh projections for increased or decreased traffic (as the case may be). This would help to identify the contentious issues and the Bórd would then be in possession of the facts to decide on them.

I have already stated my view in other submissions that the provisions of Aarhus Convention apply to the BusConnects project and that in my view the consultation process (largely due to lack of resourcing it) falls far short of meeting the standard required. I think this is particularly so on this corridor. I think it is essential that the Bórd insist that the law in this regard be complied with. I have explained the Aarhus deficiencies in other submissions on what is effectively one project of 12 corridors, so I believe you should cross refer to my other submissions.

Further NTA have chosen to engage in a consultation process. They continually refer to this as "non statutory" as if in some way it needs a "qualification". They need to explain what this description of "non statutory" is intended to connote. It is simply not acceptable that if they choose to consult, they should inform and engage with some but not with others. The first version of the plan proposed widening Crumlin Road to four lanes; clearly the people of Crumlin Road were heard and this feature disappeared. However the disadvantages to this were not teased out by NTA with affected people, largely because I believe the affected people are simply not aware perhaps even now of the issues caused for them.

There appears to be a suggestion made by some in meetings on corridors that in some way conflates the concepts of "consultation" and "agreement". I think it is essential for proper "consultation" that everyone potentially affected by the scheme has the material (in a clear form) to understand the upsides and the downsides and to make representations. If that is the case, the fact that someone is disadvantaged and makes an observation would not mean that the scheme does not go ahead; however their view will be in the weighing scales leading to the making of the decision.

I believe the people in areas adjacent to Crumlin Road on the south have done very poorly out of the BusConnects schemes. The 17 and 18 services which currently service the estates are to be removed from the estates. The 83 service which starts in the estate is being replaced by a lower frequency service (number 82) originating in the very western reaches of Tallaght. The 150 Kildare Road service originating in Templeogue is being replaced by another low frequency service (number 71) also originating in Tallaght. The only other service is a service coming from Dundrum to the city via Dolphin's Barn. The predicted consequence of local bus corridors is a lot of extra traffic on local roads particularly Lorcan O'Toole Park and Stannaway Road. They have not been advised about this by NTA or asked for their input. I don't think this can be described as "consultation".

Again there are a number of roads in Drimnagh forecast to be affected by extra traffic. Further the bus services in Drimnagh are changed substantially. Again have the people of Drimnagh been advised of this and asked their view?

TRAFFIC MODELLING

The net effect of this scheme and schemes between this corridor and the Ranelagh Road is to displace a lot of traffic into local roads by the effective closure of main roads with lots of bus gates. In these circumstances the citizens of the area have a right to clear and proper information about where the displaced traffic is to go, what is the estimate of its volumes and what extra bus and rail capacity is to be provided to actually give the motorist an alternative. This is not in the document. This is not a feature of any other segment of the city as "bus gate" induced diversions are minimal. Therefore this application should contain a lot of extra information as opposed to other corridors.

It is evident from Chapter 6 Traffic and Transport pages 152 and 159 that there is an enormous amount of displacement of traffic into local roads. There are some very heavy reds in both maps. These maps are very clearly based on the scheme as a stand alone and do not take any account of adjacent schemes.

It is further evident from maps for some reason "buried" in Volume 3 Part 3 of 3 Figures 6.13 to 6.16 of Chapter 6 (I call these later the 6.13 etc maps), that when all the corridors are taken together, there is a concentration of displacement of traffic into local roads in three areas (a) between this corridor and the Kimmage corridor (b) between the Rathfarnham corridor and the Bray corridor and (c) between the Bray corridor and the Blackrock corridor. By contrast on these maps, there is relatively little blue or red lining in any part of the north side or in the west side of the city down as far as this corridor. There are lots of very thick red bands in the three areas. There needs to be much more exacting standards set for information in areas where there is great displacement of traffic.

We have always been conscious in this area that there was going to be a substantial diversion of traffic into local roads. We asked continually for traffic projections. We have asked our public representatives to get them. We have flagged that we want traffic projections for times other than the AM and PM peak, if the bus measures were to be applied at those hours. What has been produced is shocking and is wholly inadequate to assess where the traffic is going to go if bus corridors are in place. **I would ask that the Bórd insist at an early stage on proper projections and that these be fully advised by circular to all local roads where material changes are projected, with an opportunity to input.**

I think it is essential in making your decision that you have comprehensive projections, as on the southside areas affected, you need to know where the displaced traffic is to go. I believe a similar issue arose on the application to you for the College Green Plaza (your reference 29S.JA0039 where the Bórd rightly identified that the plans as submitted did not deal with where displaced buses would go.

Proper projections would at least require

1 maps which are large enough to identify precisely the affected roads. I went in to the Bórd's office to inspect the physical documents and even then the maps for the entire city are too small to decipher vital information by road. It is guesswork to assess which roads will suffer the negative environmental consequences of diverted traffic if the projections are right.

2 projections for times such as 11am to 12 noon and 3pm to 4pm. This is because if traffic is permanently rerouted, the extra traffic at those hours is likely to be much more noticeable than extra traffic at 8am to 9am. It is one thing to have extra traffic on a residential road in the morning peak; it is wholly different if it goes on all day and presents a very material environmental deterioration in terms of things including noise, pollution, pedestrian safety, enjoyment of on street parking. For example map 6.13 seems to identify a very quiet section (maybe 10 cars in 20 minutes off peak as observed by me) of Cashel Road in Dublin 12 as having up to 200 extra cars AM in both 2028 and 2043. We simply don't know what its traffic will be like at other times.

3 it is simply not good enough that these maps can only function in blue and orange. They need to use a greater range of colours, so that the precise band of increase can be identified.

4. If the model is saying that increases/decreases on other roads are less than 100, it should be able to back this up with precise figures. Otherwise how could it know there is not going to be a greater adjustment. Precise figures for every through road in an area should be included where, as with this scheme, very significant local displacement is predicted.

5 There should be an explanation given as to why increases are forecast. For example it seems obvious from the 6.13 figures that a very substantial number of extra vehicles are likely to follow a route Wellington Lane, Whitehall Road West, St Agnes Road, St Agnes Park, Armagh Road and Cashel Road. Further there is a massive increase in Lorcan O'Toole Park and Stannaway Road. But no explanation is given.

6 many drivers use SATNAV and there should be an assessment of where SATNAV will direct traffic to go if a bus gate closes a road or there is a serious hold up caused by bus priority lights.

The reliability of exiting projections

I have been continually attempting through this process to get information on projections as they are vital to this general area. However I have been stonewalled except for one call with an NTA rep which happened on 4 December 2020 on which I have a contemporaneous note. As at public meetings, on the call I described then drafts of projections as a "mess" and my impression was that the NTA rep agreed. The NTA representative was unable to clarify the thickness of the red and blue lines and unable to explain what direction the increased traffic would be travelling. They advised that it was all computer generated and seemingly no one had really interrogated the computer output.

I think the existing projections are frequently wrong and cannot be trusted. A couple of examples

Map 6.13 shows a likely 400 to 600 extra cars on Belmont Ave in Donnybrook. This seems to be coming from the Sandford Road end given the very thick line to that point and thin line after. However the turn into Belmont is closed off, so that is simply not possible.

The figures in Traffic and Transport identify Dromore Road in Drimnagh as in line for a significant increase in traffic PM peak (271 to 470). I think this is actually intended to refer to the parallel Knocknarea Avenue, but the wrong road has been cited due to the unacceptable high scale of the map.

Again in map 6.13 both part of Balfe Road and Harty Avenue in Walkinstown are shown as having over 100 extra cars but there is no follow through impact on Thomas Moore Road – which in theory half the extra traffic can go left or right, this is unlikely to be the reality. Further it is proposed to ban a right turn exit out of Balfe Road. The micro data makes no sense in this area. There are lots of examples like this where lines denoting extra traffic seem to disappear into the air. The only way to rationalize this is to provide data for every through road.

Draft projections showed an extraordinary amount of traffic on Downpatrick Road (see attached) a very narrow road off Sundrive Road. This has entirely disappeared in the final version, even though there appear to be no changes which should make the problem go away. This entirely undermines my belief in any of the figures.

If substantial extra traffic is diverted into side roads, this has significant negative environmental consequences. Traffic noise will become consistent. Pollution levels will go up. Pedestrian safety is likely to be impaired particularly if traffic ignores speed limits. Lots of journeys are likely to be longer in terms of kilometre length. I cannot see that a project which diverts lots of traffic into side roads is environmentally acceptable.

METRO TO THE SOUTH WEST/CITY EDGE

It is clear from some documentation supplied that a metro into the south west city is seen as a possible project to be taken into account. For example in the Screening Report at page 40 there is reference to “potential Metro South alignment; SW option”

I believe that before this project is approved, alternatives need to be properly considered. The prime purpose of this corridor is to provide the principal public transport corridor to the Tallaght area. I submit that a much better alternative would be to continue the Metrolink to Tallaght or some point adjacent to Tallaght. This is advocated by the group MetroSouth West and by numerous public representatives. I would have expected that this planning application would be accompanied by a paper examining the Metro South West option, particularly given references to it. I believe the Bórd should seek such a paper. Metro would be a far better environmental option for the entire south west city.

I believe that the Luas to Tallaght is already frequently over capacity based on a number of recent trips by me at random times. Further there is a project City Edge to develop the Naas Road area as a very big residential neighbourhood, which will impose big demands on Luas. This is a project to have between 50-100k people living in the area served by the corridor and is part of both South Dublin and Dublin City development plans, recently evolved. I am not sure this is addressed anywhere in the thousands of pages even though it is clearly a directly relevant issue as the D1 and D3 services will be on the Clondalkin part of this corridor and traverse City Edge. It would not be sufficient to address this issue in a “Response to ABP submissions” as this confines the circle who can comment to a small group.

I am quite frankly surprised at the fact that in 5,000 plus pages there is not even a superficial analysis of metro to the south west, the capacity of red line Luas or the City Edge project. This seems to be a very material omission.

THE CITY CENTRE VOID

The D buses which run on this corridor from Walkinstown will all traverse the city and will then run on the Clongriffin corridor from Fairview. While I would not necessarily have expected an analysis on the first application (Clongriffin) of the cross city issues, now that we have an application for the second relevant corridor, I would have expected a thorough analysis of what happens between Christchurch Place and Fairview. However there is nothing on this subject.

It would seem from bus route maps that the intent is that all these buses would traverse the north and south quays respectively and then travel via Amiens Street and North Strand. However there seems to be significant issues of a vast over convergence of buses on the city quays. This seems very environmentally problematic given the significant cycling and pedestrian use there.

Further it is in the public domain that Dublin City Council intend to apply yet again for a Plaza at College Green and closing there and Dame Street to all traffic. There is no analysis at all of the impact on this on bus routes using this corridor which are to use that route in the city.

It is my observation based on quite a number of bus routes that the buses really slow down when they reach the city centre. This is often because other buses are blocking the bus stop. I believe very strongly that any time saving achieved by these corridors will be cancelled out by what happens in the city centre; yet we have no information or plan in this document.

For the record here the asserted average inbound savings on Clongriffin are 4.7 increasing to 5.2 minutes and average outbound are 4.1 decreasing to 3.2 minutes.

For this corridor the claim for D1 is 4.7 minutes decreasing to 3.6 minutes inbound (page 132 Traffic and Transport) and 2.1 minutes decreasing to 1.6 minutes outbound (page 136) and for D2 7 decreasing to 2.4 minutes inbound (page 140) and 9.3 increasing to 11.1 minutes outbound (page 144). The discrepancy between the two would strongly suggest that the time savings are largely somewhere between the Half way House in Walkinstown and Tallaght where the corridors separate.

OTHER ISSUES

Bunting Road

It is great that on this scheme, a proper off road cycle track has been identified from Walkinstown Roundabout to within the canal via Bunting Road, St Mary's Road, Kildare Road and Clogher Road. This is pretty well as direct as the bus corridor and is in sharp contrast to the poor provision for "cycle track less stretches" on other corridors.

The work on the Bunting Road section should be expedited. The cycle track there is in a deplorable condition and is rather narrow.

Park View

I find the arrangement where the small estate known as Park View just the other side of the M50 heading to Tallaght is to become an island in the middle of bus lanes, busy roads and cycle lanes, very strange. Hopefully the people there have been made fully aware of this. I cannot think of any precedent in Dublin or elsewhere where a small residential street is on a traffic island.

Clonard Road and Bangor Drive

I note the exit from these onto Crumlin Road in either direction is to be blocked. Further access is only possible by turning left.

Traffic surveys which are rather out of date (2019) show about 1,000 to be banned movements per day

465 turning left ex Clonard and 434 turning right survey 9-31

534 turning left ex Bangor and 536 turning right survey 9-32

Further the same surveys show 258 and 322 respectively turning right into those roads.

There is no bus related reason for the left turn ban ex Clonard as the bus lane outbound starts there (map 26 of 56) so traffic will have to join the traffic lane.

If these roads are to be blocked, it will put pressure on the unsuitable Old County Road, which has lots of parking. The bans are therefore likely to have a very negative environmental impact of Old County Road. The traffic surveys from November 2019 show about 500 turning both left and right at the hospital end of this road and 112 turning left and 1,168 turning right opposite Crumlin Shopping Centre. I think this also inevitably directs traffic to Downpatrick Road.

My main concern in all of the above is a serious doubt that any of the locals have been consulted on this. Further there are environmental consequences for exclusively residential roads.

Slip Road at Walkinstown

I believe you should not permit the removal of the slip road from Drimnagh Road into Walkinstown Road/. Traffic survey 9-17 suggests that 5,617 vehicles moved from B to D which seems to be that direction. As I have said before in other submissions, the inadequate presentation of the traffic statistics as a jumble of figures is an impediment to the analysis of the data, an inexcusable omission by NTA, which they failed to correct on request.

I expect that DMURS will be quoted as the authority to ban all left slips. However this seems to be aimed at slips with little extra effective vehicular capacity and also envisages substitute arrangements where demand warrants – I submit that 5,617 vehicles is a lot of “extra vehicular capacity” and a situation where “demand warrants”

Bus priority signal

I fully approve the proposal for an inbound bus priority signal covering about 350 metres of road (see map 25 opposite 319 Crumlin Road) and a matching outbound signal covering about 300 metres of road on map 27 at the Health Centre. This is an excellent solution for dealing with a restricted section of road, without creating a situation where traffic is completely blocked from using the road. If this solution works here, it is capable of working in all other parts of the Bus Connects project.

It is clear to me that motorists do not understand these bus priority signals. There needs to be a public information exercise explaining that at busy times they are likely to be red for extended periods of time. It would be useful if these signals had a clear label "bus priority" visibly displayed, so that motorists can easily distinguish them from other signals and know to expect lengthy red phases until the single lane road in front of them clears. I am not sure whether you can recommend in your consent that there should be a public information exercise, but given their prevalence in the entire system, this is essential.

Other issues

I have made points in other submissions about

The lack of any clear statement of the works to be carried out

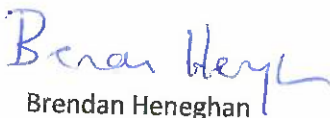
The moving of bus stops without notice to anyone

The unintelligible traffic data which NTA refuse to summarise despite a view from the information commissioner

The omission to advise the public about the €50 fee (which I reluctantly enclose).

All of these are equally applicable here and I believe should be taken into account.

I regret having to trouble the Bórd with such a lengthy letter. This however arises because NTA has failed to provide easily understandable material to the entire indirect study area (as identified in Traffic and Transport), has failed partly as a result to consult properly, has failed to address obviously relevant topics and is evasive about answering any questions. If they had done this, I am sure we would now be narrowed down to a handful of issues where there is a genuine planning issue as to whether you should say yes or no.



Brendan Heneghan

88 Parkmore Drive

Terenure

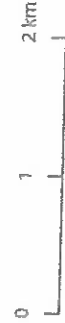
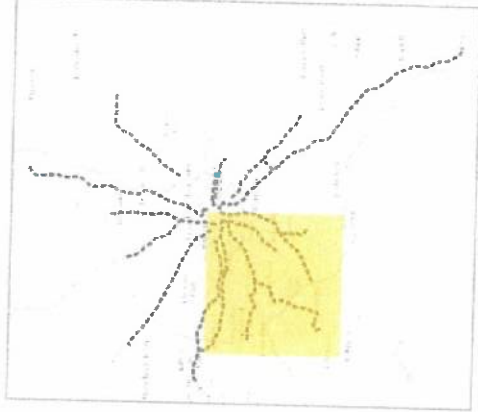
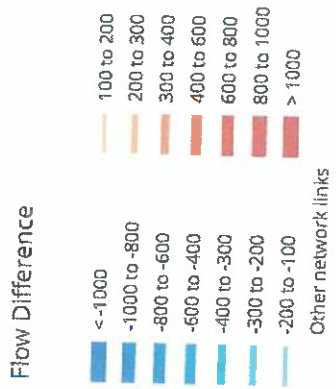
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30/06/23

GREEN HILLS

DOWNPATRICK

Proposed CBC – Estimated change in road traffic with CBC in place (AM Peak 2028)



Change in Road traffic flows as
a result of the Proposed CBC