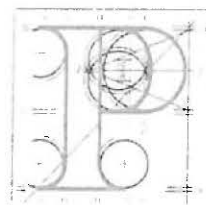


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Conor Gerard Maher
9 Cherrington Drive
Shankill
Dublin 18
D18AN20

Date: 02 August 2024

Re: BusConnects Bray to City Centre Core Bus Corridor Scheme
Bray to Dublin City Centre.

Dear Sir / Madam,

An Bord Pleanála has received your recent correspondence in relation to the above mentioned case. The Board will take into consideration the points made in your submission.

If you have any queries in relation to the matter 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,

Breda Ingle
Executive Officer
Direct Line: 01-8737291

CH08

Teil	Tel	(01) 858 8100
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Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Sinead Singleton

Subject: FW: Bord Pleanála Case reference: KA27.317780
Attachments: CGMaher_14072024_KA27.317780.pdf

317742,

From: Conor Maher <[REDACTED]>
Sent: Monday, July 15, 2024 1:17 PM
To: LAPS <laps@pleanala.ie>
Subject: Bord Pleanála Case reference: KA27.317780

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 Secretary,

I refer to your correspondence of 15 June 2024 referencing the response by the National Transport Authority to public submissions received in respect of the Strategic Infrastructure Planning Application for the Bray To City Centre Core Bus Corridor Scheme.

Please find my further submission in response to your correspondence.

Kind regards,
Conor Maher

BRAY TO CITY CENTRE CORE BUS CORRIDOR SCHEME

Strategic Infrastructure Development Application

Bord Pleanála Case reference: KA27.317780

**Conor G. Maher
9 Cherrington Drive
Shankill
Dublin 18
D18 AN20**

14 July 2024

The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902

Dear Secretary,

I refer to your correspondence of 15 June 2024 referencing the response by the National Transport Authority to public submissions received in respect of the Strategic Infrastructure Planning Application for the Bray To City Centre Core Bus Corridor Scheme.

I wish to make the following further submission in accordance with section 217B of the Planning and Development Act 2000, as amended, in response to the submission dated 24 May 2024 received from the National Transport Authority. I note An Bord Pleanála's decision to determine the application without an oral hearing.

Given the huge level of concern created within the community of Shankill by the scheme, as evidenced by the number of submissions the Bord has received in this matter, I consider this to be unjustified and anti-democratic, removing the opportunity from those who have made submissions to the Bord, to cross examine technical witnesses from the NTA. While the Bord may have absolute discretion whether or not to hold an oral hearing on a given scheme, it is beyond belief that it has determined in every one of the BusConnects scheme not to hold an oral hearing, in spite of the large numbers of residents impacted by the various schemes.

In relation to the current scheme, the chronology of communications from the Bord is as follows:

- On 21 February, (the last permissible day to do so) notification was issued by the Bord that it would not be possible to make a determination in respect of the application within the period of 18 weeks, noting that it was the Bord's intention to make a determination by 31 July,
- On 24 May the NTA made its submission in response to the various submissions from the public in respect of the scheme,
- On 13 June, the Bord notified those who had made submissions that it had decided to determine the application without an oral hearing.

Having considered the submission from the NTA for a total of 20 days (14 working days), the Bord has determined that it was satisfied to excuse the NTA and their advisors of being cross examined at oral hearing. It is difficult to see how the Bord can have comprehensively reviewed the content of the 900 plus page submission by the NTA against the many and varies public submissions received last October before determining that it would not hold an oral hearing. This is particularly unreasonable given that the NTA have not adequately addressed a great many of the issues raised in submissions by the public.

In addition to expressing my disappointment and disquiet at the Bord's decision not to hold an oral hearing in respect of this application, I wish to again restate the objections to the application, set out in my submission of 10 October last. I contend that the submission by the NTA does not deal with the concerns raised by myself and others, and relies for the most part on generic and generalised responses.

In particular I wish to reiterate my objections on the grounds of:

- The Need for the Scheme,
- Consideration of Alternatives (or rather the absence thereof).

Need for the Scheme

The genesis of this scheme is as part of the overall BusConnects programme. The programme seems to be predicated on a starting assumption that a civil engineering led approach is appropriate for the upgrading of bus services in Dublin. The design and planning approach then mimics the process adopted in the selection of new greenfield routes for road schemes. This is not appropriate for a public transport project that of its nature must include a range of elements other than civil engineering, including upgraded route technology and advanced ticketing systems.

For the case of a road scheme, it is clear that unless the entire scheme is approved, then the scheme is no longer viable. Thus, in such situations, An Bord Pleanála is presented with an "all or nothing" decision. Either it approves the scheme in its entirety or it must reject the scheme in its entirety. It cannot approve the scheme in part. This is not true for the Bray to City Centre Core Bus Corridor Scheme. The sections of the scheme from the City Centre to Loughlinstown Roundabout and from Wilford Roundabout to Bray could be approved and the section from Loughlinstown and Wilford omitted, without fundamentally altering the benefits delivered by the scheme, but significantly reducing the costs and the environmental and social damage to Shankill and its community.

Moreover, the absence of a clear disaggregation of the benefits, that would allow journey time improvements and passenger number increases to be evaluated according to the proposals along the individual sections of the route prevents the Bord from undertaking such an assessment of the benefits. I contend that the NTA has not been at all forthcoming in relation to the overall

contribution in reductions to journey times along the entire route arising from the proposed Section 3 of the scheme between Loughlinstown and Wilford. No detail has been provided in the NTA's submission in response to the points that I and others had raised in this matter. Furthermore, the lack of separate quantification of the benefits that would accrue from (a) the adoption of bus priority technology along the route and (b) the implementation of an improved bus ticketing system in line with many other cities, prevents the Bord from assessing the individual value of these improvements.

No acknowledgement is made in the EIAR or the various documentation submitted by the NTA that the Bray to City Centre Core Bus Corridor Scheme is quite unique among the proposed Core Bus Corridors. Firstly, it parallels the DART line running between Bray-Greystones and the City Centre. Secondly, the section from Cherrywood to Bray parallels the proposed future route of the Brides Glen to Bray Green Line LUAS extension. Thirdly, from Loughlinstown Roundabout to Wilford it parallels the M11 corridor, along which the new bus corridor that is being planned within the motorway reservation. Surely in determining the need for the scheme, the existence of these parallel and overlapping public transport corridors should have been considered in detail as part of an overall public transport plan. Instead we are presented with a scheme where the outcome appears to have been pre-determined from the start, in line with the original BusConnects concept, but completely divorced from proper consideration of optimising public transport along the city centre to Bray corridor. The net effect is to inflict unwarranted environmental and social damage on the community of Shankill.

Consideration of Alternatives

In my submission of October last, I set out my concerns in relation to the route selection process and the consideration of alternative routes. My comments have not been addressed in the NTA's response.

The consideration of alternatives for this scheme has been limited to presenting unfeasible "route options", then choosing the obvious existing route without separately assessing the contributions from the different sections of the chosen route, or quantifying the benefits of implementing bus priority technology and advanced ticketing solutions. The route options assessment appears to have been a contrived exercise with a pre-determined outcome.

As outlined in the previous section, consideration and quantification of the benefits of bus priority technology along the route and the implementation of an improved bus ticketing system in line with many other cities, were not considered as part of the exercise. Although proposed as part of the overall BusConnects package, these should have been considered as "do minimum" alternatives, and the benefits quantified.

I note that the NTA have not addressed this matter in their submission. No indication is given as to what benefits might be expected from bus priority measures along the full route.

However, the NTA do address the issue of the ticketing system on page 316 of their response.

Ticketing System

Regarding the suggestion for ticketing system, the second biggest source of bus delays, after traffic congestion, is the payment process at bus stops. Payment of fares by cash is still commonplace, slowing down the boarding time. Even when using

the Leap Card, the complexity of payment stages means a high percentage of passengers must interact with the driver, with resultant delays. At busy bus stops these delays can be for several minutes. Multiply by the number of busy stops on a route, and those delays accumulate to add significantly to the overall journey time.

Under BusConnects this process will be simplified and streamlined. The overall proposals will make the fare system simpler, and movement between different bus services seamless and easy, without financial penalty. This will require a move to either a "tag-on" and "tag-off" facility, similar to Luas and DART, or a single "flat fare" approach in order to reduce the need to interact with the driver for fare payments.

As part of this process, cashless operation will be introduced on all buses, to remove the delays caused by cash payments. Currently over 70% of fare payments are made by Leap card. As these increases, the transition to a cashless payment regime will become easier. BusConnects will incorporate the latest developments in account-based ticketing technology, potentially allowing use of credit / debit cards or mobile devices as a convenient means of payment. This will also allow integration with other transport payments such as parking facilities and bicycle hire.

Why do we have to wait to have a modern ticket system to be introduced until the BusConnects civil engineering projects are brought forward? The Leap Card is an improvement on what preceded it, but it lags behind the payment and ticketing options available to passengers in other major cities. The NTA in their response state that the second biggest source of delay to buses is "the payment process at bus stops". Based on my experience of the 145 and 155 routes I fully agree. If the NTA recognise the benefits of improved ticketing technology, why are they not willing to quantify for interested parties what the savings in journey time might be?

Is it because the journey time savings that would be delivered from the deployment of bus priority measures and enhanced ticketing technology would far outweigh any time savings derived from the proposed destruction of Shankill and environs, and at a fraction of the cost?

In my submission to the Board in October, I endeavoured to look at the journey time savings along the route from the City Centre to Bray. The NTA have not responded comprehensively to the points raised. I would like to know what proportion of the overall quoted 5-6 minute journey time savings along the route will be attributable to the bus priority measures and benefits from enhanced ticketing and how much to the destructive engineering measures in Shankill Village and its northern and southern approaches.

Conclusions

While I acknowledge the NTA's efforts to mitigate the worst effects of their proposals on the Main Street in Shankill Village, in reality the consequences for Shankill and its environs of their BusConnects proposals still represent an appalling vista of environmental destruction.

Given the level of environmental impact on Shankill, I am shocked that the Bord has determined that it does not deem it appropriate to hold an oral hearing in order to consider the very serious environmental and social impacts arising.

I consider the NTA submission of 24 May to be generic and reliant on generalised responses to the specific issues raised in my and other submissions to the Bord last October.

In summary, I again wish to make the following points:

- a) The Need for the Proposed Scheme has not been demonstrated by NTA to a sufficient degree, either in their initial Application or in the further information provided in their Submission of 24 May.
- b) The deficiencies in the Traffic and Transport Assessment underscore the fact that the Need for the Scheme has not been demonstrated. The absence of appropriate disaggregation of contributions from the different sections of the scheme to the overall benefits deriving from the scheme is a fundamental flaw as is the absence of information on the savings / benefits deriving from the bus priority measures and ticketing enhancements. In their Submission of 24 May, NTA have provided no additional information in this regard.
- c) In the case of Section C of the scheme between Loughlinstown and Wilford, the consideration of alternatives has been limited entirely to a contrived assessment of largely unfeasible routes and sub-routes within the environs of Shankill. The NTA provided no response to my earlier comments in their Submission of 24 May. I contend that given the above lack of consideration of real alternatives the Application does not comply with the requirements of the EIA Directive.

Yours sincerely,

Conor G. Maher