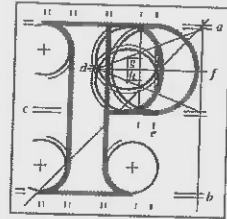


Our Case Number: ABP-314942-22



An
Bord
Pleanála

Chapelizod Residents Association
55 Saint Laurence Road
Chapelizod
Dublin 20
D20 HK40

Date: 9th February 2023

Re: BusConnects Lucan to City Centre Core Bus Corridor Scheme
Lucan to Dublin City Centre

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 meantime, please contact the undersigned.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Doina Chiforescu
Executive Officer
Direct Line: 01-8737133

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Planning Submission

by

Chapelizod Residents Association

In relation to

Lucan to City Centre Core Bus Scheme

Planning Application no. HA29N.314942

by

NTA BusConnects

AN BORD PLEANÁLA	
LDG-	<u>060 343-23</u>
ABP-	<u>314942-22</u>
10 JAN 2023	
Fee: €	<u>50</u> Type: <u>cash</u>
Time:	<u>10.24</u> By: <u>hand</u>

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CHAPELIZOD RESIDENTS ASSOCIATION (Estd. 1942)

Chair: John Martin, Treasurer: Vincent Ferguson, Secretary: Jerome Casey

55 St. Laurence Road,
Chapelizod.
Dublin 20.
D20 HK40.
1/5/2023.

Bord,
An Bord Pleanala (Strategic Infrastructure Division)
64 Marlborough Street,
Dublin 1.
D01 V902

Re: HA29N.314942. BusConnects to city centre

Abbreviations used in this submission

Summary Letter to An Bord Pleanala

CRA: Chapelizod Residents Association ABP: An Bord Pleanala
NTA: National Transport Authority IWA: Irish Wheelchair Association
MDI: Muscular Dystrophy Ireland SCR: South Circular Road
DOE: Dept. of the Environment and Local Government
DPER, Dept. of Public Expenditure and Reform

A chara,

CRA would request ABP to reject this planning application for the discrete section of BusConnects Lucan to city centre – from the Palmerstown exit to the SCR. We would request ABP to rule against the NTA's Option of BusConnects going down the Bypass and in favour of CRA's Option of an Improved Route through the Village. We do so for four reasons viz.

1. The gradient of Chapelizod Hill Road from its base junction with St. Laurence Road/Old Lucan Road to the proposed entrance to the Bypass bus stop is 1.12. This is the maximum gradient allowed for wheelchair users under Technical Guidance Document M 2022 of the Building Regulations. However the number of flights + landings required for a wheelchair ramp under Document M cannot be provided. This breach of Document M has been confirmed by experts from the IWA and the MDI (v. App.iv).

The IWA and MDI also considered that the combination of landings, flights and handrails along or near the footpath of Chapelizod Hill Road would constitute an unacceptable danger to those living along the road (v. App. IV).

2. The distance to be traveled by a wheelchair user from the base of Chapelizod Hill Road to the entrance to the bus station and up to the proposed bus stop on the Bypass would be 195m. Combined with the ascent up the approach road and from the entrance to the bus stop above, the IWA and MDI considered this also to be in breach of Document M. On ascent only, both the IWA and the MDI considered that none of their wheelchair members would be capable or willing to ascend 15 – 16m. merely to access a bus.
3. Since the Bypass was built i.e. for the past 36 years, the households living adjacent to the Bypass have neither been overlooked nor overshadowed by it. This will change if the proposed bus stop on the Bypass is allowed to proceed. From 6 am until 11.30 pm, passengers will be able to overlook the houses and gardens at Chapelizod Court, Chapelizod Hill Road and Knockmaree apartments i.e. for over 17 hours per day. This would constitute an intolerable loss of amenity. Any attempt by the NTA to mitigate this overlooking would be counter-productive. Firstly, the height of screening required would be visually very oppressive on the households below. And secondly, any such screening would overshadow the houses below, cutting off their afternoon sun from late summer and autumn.
4. CRA compared the NTA's Option of Going down the Bypass with CRA's Option of An Improved Route through the Village (v. App. 1). The Improved Route was superior on five criteria i.e. length, travel time, accessibility/patronage, cost and Village Marginalisation.
 - The inward bus journey from the Palmerstown exit to the SCR is 3.7 kms. long through the village, or 0.3 kms. shorter than the route down the Bypass.
 - The journey time for the Improved Route is 42 seconds faster than the journey time down the Bypass.
 - The Bypass bus stop will be difficult or impossible to access for wheelchair users, people with restricted mobility, women/parents with buggies and the elderly. CRA calculates that the Bypass Option will secure 50% of 2019 passenger volumes, compared to 120% for the Improved Route.
 - The Bypass Option will cost €30 – 50m., compared to €0.3m. for the Improved Route.

- The Bypass Route will marginalise the village. The Improved Route will not.

CRA would request An Bord Pleanála to reject the NTA's planning application as being contrary to the proper planning and sustainable development of Chapelizod and its hinterland.

Mise le meas,

J. Jerome Casey.
Secretary,
Chapelizod Residents Association.



2. History and Overview

2.1. History:

CRA's contacts with the NRA have not been rewarding – at least from CRA's point of view. First contact with the NRA concerning their proposed bus stop on the Bypass was in December 2019 – over three years ago. A six page analysis piece was sent into Mr. Con Kehily – the then project manager. The automated acknowledgement promised the NTA would be in contact within 10 working days. CRA was never contacted.

In February 2022 CRA made contact again – this time with Mr. Colin Murdock, who had replaced Mr. Kehily. By early April, CRA had presented papers (v. App. 1) on the need for a cost/benefit study, five measures on which the Improved Route was superior to the Bypass Route and the 11 particular improvements which would drive the Improved Route. In all its dealings with the NTA, CRA never received one written word from the NTA in reply. As we slowly learned, the NTA's approach was to listen to our arguments and then completely ignore them.¹ The NTA was also even-handed not only in ignoring suggestions from private citizens like CRA, but also in ignoring public policy under the Public Spending Code. The Code required that a cost/benefit study be undertaken where the difference in investment cost between two competing projects exceeded €20m. The NTA knows this. Mr. Creegan, Deputy ceo of the NTA, knows this (v. App.3). But they and he chose to ignore it when the matter was inconvenient.

An agenda was agreed in late April, but it took another six weeks before a joint NTA/CRA meeting was held on 13th June (v. App 3). Like the Paris theologians described by Umberto Eco, the NTA were “**secure in their errors**”. The meeting ended early. On reflection, what was most disturbing was that only one of the four NTA senior personnel had visited Chapelizod. Now any professional engineer, architect or planner – before designing a structure – will first visit the site, and subsequently ensure that her/his design accommodates the site's peculiarities. This was particularly necessary in the case of the proposed Bypass bus stop, since an extra structure was being added to an already-constrained urban motorway. The NTA did not visit, and instead took their information from existing maps and charts. This was regrettable, since site visit(s) would have immediately confirmed the unsuitability of the Bypass bus stop for those with restricted mobility. Before the meeting ended, the CRA Chair twice extended an invitation to the NTA to visit Chapelizod. The NTA refused: to reprise Eco, the NTA remained “**secure in their errors**”.

¹ One is reminded about a famous complaint of an Irish politician about a woolly opponent, “*Its like playing handball against hay cocks: the ball never bounces back*”.

Although the NTA personnel assured CRA that they were senior enough to refer projects to their Board, CRA decided to make a final approach to the Board of the NTA, as it considered the matter to be strategic for the NTA. In early August, the file was sent to Mr. Fred Barry, Chair of the NTA. A reply was received on his behalf from Mr. Hugh Creegan at the end of August (v. App. 3). It is terse, and rejects CRA's contentions, using the Argument from Authority.² The last paragraph of the reply barely conceals impatience with CRA's impertinence.

Since the June 13th meeting, CRA has corresponded with the Minister for Transport, Mr. Eamon Ryan T.D., suggesting *inter alia* that he should appoint a senior Transport official to investigate the matter: no reply to this has yet been received. The DPER said the parent Dept. of Transport should investigate the missing Cost/Benefit study: however it did advise CRA that the person responsible for implementing the Public Spending Code in this case was the Accounting Officer of the Dept. of Transport. Accordingly CRA wrote to Mr, Ken Sprat, DG of the Dept. of Transport on 19th December 2019 (v. App. V). The email asked the Accounting Officer to investigate the NTA's failure to undertake a Cost/Benefit study, why the NTA failed to provide CRA and the IWA with an Accessibility Audit, and what sanctions his Department intended to apply to the four executives at the June 13th meeting and to the two representatives of the Board for their (in)action in this matter. Although the automated response promised a speedy reply, none has yet been received by CRA from the Accounting Officer.

2.2. Overview:

CRA accepts that ABP's remit is to make judgments on planning matters referred to it in accordance with law. However, it may assist ABP in coming to its judgment, by considering why a public body such as the NTA relies on the Argument from Authority to bolster the case for its planning application rather than on the Argument from Reason, so ably deployed by NYPHET during the Covid19 pandemic. (v. App. V).

CRA does not have any inside knowledge of the culture within the NTA which would show why the NTA has developed such an unshakeable belief in the correctness of its own decisions. However some insight into how mal-governance in the NTA has arisen and continues may be gleaned from two official reports reviewing BusConnects Preliminary Business Case (PBC).³

² One elderly member of CRA, a Catholic, compared the NTA's deployment of the Argument from Authority to the Roman Curia's use of the same c. 40 years ago: "Roma locuta est; causa finita est" [*Rome has spoken; the case is closed*].

³ JASPERS Review 25 January 2022. MPAG [i.e. Major Projects Advisory Group] Review 23 February 2022.

The MPAG at 9.3 notes

*“There is a reasonably detailed overview of the governance structures within the PBC which draws a distinction between the Approving Authority and Sponsoring Authority **elements within the NTA**”.*

This is quite an extraordinary admission. As an executing body, the NTA should have absolutely nothing to do with policy-making, which is exclusively the domain of the Dept. of Transport. But now the confusion begins. At 1.23 MPAG states

“The JASPERS Review notes potential governance risks associated with the NTA holding both role(s) of Sponsoring Agency and Approving Authority.”

No such statement is contained in the JASPERS Review published on 25th January. MPAG must have been reading an earlier version of JASPERS from which such misgivings over BusConnects' governance had been edited out. Indeed, in its published report, JASPERS approves the governance of BusConnects at A.4.5 viz.

“A programme specific governance framework has been established, clearly identifying the roles and responsibilities of each stakeholder”

Having noted JASPERS (now edited out) misgivings about governance in 1.23, MPAG attempts to give definitive reassurance in 1.24.

“in fact, the Government is the Approving Authority. It is the role of the relevant Government Department - in this case the Dept. of Transport – to fully support Government in this role.”

This earnest statement of what should happen is not in line with CRA's experience in dealing with the NTA. It appears to us that, in the language of economics, the Regulated (the NTA) has captured the Regulator (the Dept. of Transport). This “regulatory capture” breaches the first rule of good governance, which is based on the old Roman Law maxim of “*nemo iudex in causa sua*” [no one can judge their own cause].

Initially the Senior Executive of the NTA, and subsequently the Board of the NTA, are proposing a transport scheme which is not accessible to citizens with limited mobility and which wastes large amounts of public funds compared to an Alternative Option. And so far, the Dept. of Transport has tacitly approved the scheme. The governance safety net, as outlined by MPAG above, is broken.

CRA would reiterate that it does not wish the ABP to stray beyond its remit in deciding on this scheme. However, CRA would request the ABP to bear in mind

the common good when deciding on the discrete section of planning application
HA29N.314942 from the Palmerstown exit to the SCR.

3. Bases of Objections

The detailed reasons for CRA's four objections to HA29N.314942 are contained in App 1, App 2 and App IV. This section adds some supplementary remarks.

3.1. Inaccessibility of bus stop. Height and Distance:

The proposed busstop on the Bypass was deemed inaccessible (v. App. IV) for passengers with limited mobility for two reasons viz,

- Firstly, it breached Document M of the Building Regulations with regard to both height and distance.
- Secondly, in the long experience of both experts from the IWA and MDI, the proposed bus stop was inaccessible.

CRA would wish to express their appreciation and gratitude to Ms. Emma Jane Morrissey, National Access Programme Manager with the IWA and to Mr. Owen Columb, Facilities Coordinator with Muscular Dystrophy Ireland, for submitting App.IV. Both are long-standing experts in the field of access and, to repeat, both considered the proposed bus stop to be inaccessible – particularly for a manual wheelchair user.

In addition to his professional abilities, Mr. Columb brought two additional elements of experience : he is a long-term resident of Chapelizod and he is a (powered) wheelchair user. Mr. Columb described how he once descended Chapelizod Hill Road in his wheelchair, coming down from Ballyfermot. From the apex of the road to the underbridge, he reckoned the gradient to be 1:10, and in places steeper. Although the weather that day was good, he found traction for his wheelchair to be problematic and the descent dangerous. The NTA proposes to use this section of the road for the western entrance to the busstop above. This cannot occur, since Document M rules out a gradient as steep as 1:10. Lest it be argued that Mr. Columb's appreciation of gradient is faulty, he went on to mention a gradient of 1:12 for the lower part of the road. This is the actual gradient, as was subsequently calculated from Ordnance Survey data.

CRA has not formally added this increased gradient on the upper part of Chapelizod Hill Road as a fifth reason for ABP to reject planning application HA29N.314942. But we would ask ABP to bear it in mind when coming to a decision.

3.2. Overlooking and Overshadowing:

The overlooking problem with the ramps up to the proposed bus stop was first mentioned to the NTA early in April 2022 (v. App. !). Along with a number of other CRA suggestions, this was not incorporated into the NTA's planning application in October 2022.

3.3 Choosing the Improved Route Option:

The detailed argument is contained in App. 1. Of the 11 initiatives suggested for the Improved Route, two are major (bus indent, rubber cone roundabout) and the other 9, while individually small, would be cumulative in effect.

Frankly, CRA were surprised that the Improved Route was shorter and took less time to travel than the Bypass Route. However, unlike the NTA, CRA did not rely on secondary sources: instead we went out and measured both routes for time and distance traveled.

J. Jerome Casey,
Secretary,
Chapelizod Residents Association.
1/8/2023.

Appendix 1. Measuring both Options + C/B Study

CHAPELIZOD RESIDENTS ASSOCIATION (Estd. 1942)

Chair: John Martin, Treasurer: Vincent Ferguson, Secretary: Jerome Casey

55 St. Laurence Road,
Chapelizod.
Dublin 20.
D20 HK40.

Mr. Colin Murdock,
Senior Planning Manager,
National Transport Agency,
Dun Sceine,
Harcourt Lane,
Dublin 2. D02 WT20.

Re: BusConnects Bus Corridor 6 and Chapelizod

Dear Mr. Murdock,

In this cover note, there are a number of issues which I would like to raise for your consideration. viz.

1. Cost Benefit Analysis:

In our discussion, I asked the NTA to undertake a cost-benefit study of two options - Upgraded Bus Passage through Village v. BusConnects 6 goes down the Bypass. You were non-committal. Since then, I have been reading the Local Government Auditor's audit report on DCC for 2020 [Yes: it keeps me off the streets!]. On page 10, having reviewed a District Heating Scheme due to cost €73m., the auditor advised,

"As the project value exceeds €20m., a cost-benefit analysis as required by the Public Spending Code, is currently being finalised".

As the capital cost of providing bus stops under the "BusConnects goes down the Bypass" option is highly unlikely to be less than €20m., the NTA must undertake a cost-benefit study. I have included some of the technical considerations which might be addressed in such a study in an accompanying note.

2. Accessibility:

The proposed bus stops on the Bypass are located above Chapelizod Hill Road – the closest the Bypass comes to the core of the village. Unfortunately, from the point of view of accessibility, this location is extremely challenging, for two reasons viz.

- The gradient of Chapelizod Hill Road is very sharp – unavoidably so – as it needs to rise over a short distance from Anna Livia bridge (the lowest point in the village) to breast the crest of the valley wall up to Ballyfermot.
- The Bypass designers considered that to provide headroom for trucks on the bridge under the Bypass would make the gradient on the Bypass too steep at this point. And so, the underbridge can only take cars and vans. However, as the sign shows, the headroom from the Chapelizod Hill roadbed to the base of the Bypass is a considerable 2.8m..

There are four categories of potential users who would find it difficult to access the bus stops on the Bypass – wheelchair users, those with restricted mobility, women with buggies and the elderly. All four will find it extremely difficult to walk c. 200m. up the steep slope of Ballyfermot Hill Road, particularly to the entrance to the bus stop to the west. To climb up from the road to the bus stops, a series of ramps and steps are proposed. Three of the four groups (wheelchair users, those with restricted mobility and women with buggies) will be unable to ascend the steps. However, the most disadvantaged of potential clients will be wheelchair users. To gain 5m. in height, they will have to travel 200+m. over rests and ramps, at a 1 in 20 gradient. This is much too long, coming on top of a similar distance already traveled up Chapelizod Hill Road. The Building Regulations' guidance on ramps must be heeded viz.

“If the gradient is too steep or an individual flight too long, a person using or pushing a wheelchair may not have sufficient strength to travel up the ramp”

Apart from their own weariness, wheelchair users traveling up such long ramps might face danger from youths descending on skateboards or bikes.

Chapelizod Residents Association must confess to an interest in wheelchair users. Our late Chairman, Brian Malone, was a wheelchair user from his 20's and

for 40+ years lived in a house nearby, from whose garden he could look down on the proposed bus stops. Brian was also an active member of the Irish Wheelchair Association (IWA). We have approached the IWA and they have agreed to inform and counsel us in this matter.

Finally, to reduce the inaccessibility problem, high capacity lifts are required for both the western and eastern bus stops. And although absolutely necessary, these lifts should not be seen simply as cost-enhancing, since there will be considerable savings in land take and in construction cost, particularly at the eastern bus stop facing down into the village.

The problem of access up Chapelizod Hill Road remains to be resolved. If it is not, patronage of the bus stops will only be by the energetic able-bodied: our knowledge of the village's inhabitants would suggest that this cohort would represent less than one half of pre-Covid19 bus users. A type of traveling road system is required to assist all others to ascend the hill.

3. Some issues of detail:

The current drawings are conceptual. Detailed drawings will be undertaken if the scheme proceeds. However, some issues of detail might be raised now,

- The installed lifts should rise to service an over-pass corridor, to allow wheelchair users to access the Ballyfermot side, to get on a west-bound bus.
- In considering the "ramp arrangement" to the inbound bus stop, mention is made of "existing trees and planting" and "urban realm opportunities". But the elephant in the room goes un-mentioned. For c. 36 years, the householders in Chapelizod Court and the eastern side of Chapelizod Hill Road have not been overlooked from the Bypass. Now it is proposed that those using the ramps and steps could scrutinize the households and gardens below them for up to 17 hours per day. This must be avoided, and not simply allowed or merely mitigated. It will be challenging to design screening on the Bypass which will prevent overlooking of the houses below, while at the same time not blocking the late afternoon sun from reaching those houses.
- The Cross-section drawing shows a "1.5m. kerbed island" separating the bus stop from the bus lane. Might one add a pedestrian barrier on top of

this island, since buses may pass in the bus lane at speeds of up to 60 kph?

- Might one request the NTA to provide us with a third-party validation/report to assess our traffic concerns. For example, are the pull-ins, indented stations and pull-outs of sufficiently generous proportions to accommodate the extra buses of BusConnects 6? If not, there will be bunching of buses at the stations and bleeding of buses into the car lane, severely reducing the Bypass' capacity? [Last week, three buses in series were observed moving swiftly down the Bypass: 30minutes later, the same occurred]. Answers to these and other questions would require a traffic model and the capability of using it. We possess neither of these.

Yours sincerely,

J. Jerome Casey.
Hon. Sec.
Chapelizod Residents Association.



8/4/2022

CHAPELIZOD RESIDENTS ASSOCIATION (Estd. 1942)

Chair: John Martin, Treasurer: Vincent Ferguson, Secretary: Jerome Casey

Cost Benefit Study of Bus stops on Chapelizod Bypass

1. Baseline Case: Upgraded Bus Passage through Chapelizod Village

1.1. It is useful to consider what existing impediments deter the freer flow of buses, both inward to the city centre and outward to the West.

The outward, Western going is the freer route of the two. The first impediment is the pedestrian traffic lights just past the Church of the B.V.M. The traffic lights at the Mullingar House pub (i.e. junction of Main Street and Chapelizod Road) are not "green wave" synchronized with traffic lights at the bridge and at Kylemore Road. However, three public investments over the past four decades have contributed hugely to a smooth westward flow of traffic viz.,

- Two decades ago, the addition of walkways to the outside of Anna Livia bridge allowed the original footpaths to be reduced to small safety stubs. This and the removal of pedestrians from between the bus walls has allowed a much safer and smoother bus passage.
- Almost four decades ago, the developer of Chapelizod Court, Joe Leyden, was not allowed to start until he had gifted a two-bus indent at the beginning of (the very narrow) Old Lucan Road.
- About one decade ago, DCC and the NTA enlarged the slip road from Kylemore Road onto the Bypass. We expect the assessment promised by the NTA of this "merge arrangement" to confirm the village's opinion that it has been both smooth and very successful for both buses and cars.

Still going West, the bus stop at the top of Old Lucan Road protrudes. The pedestrian lights at Maryfield Nursing Home have never been commissioned. Finally, the phasing of the traffic lights at the Bypass slip at Kylemore Road favours the traffic heading down the Kylemore Road.

Going east towards the city centre, the sleeping policemen from before the hotel to the Kylemore Road lights extend into the bus lane. [Remarks on the west route about pedestrian lights and synchronised traffic lights also apply here]. The main

obstruction is the bus stop at St. Patrick's National school. When a bus is on station, no other bus and few cars can pass, due to the volume of oncoming traffic. An indent is not possible, because the school playground is already too small and, on the other side, there is a c.15' drop to ground level in the Industrial Estate.

In general, the bus route west through the village is quicker and smoother at present. This is almost entirely due to the presence of an indent at the start of Old Lucan Road going west and the absence of an indent at St. Patrick's school going east. This highlights the necessity of an indent at Linders' garage as a prior condition to considering a planning application for re-development.

1.2. The recommendations that spring from the foregoing for smoother bus passage through the village are as follows viz.

- The two sets of pedestrian lights are redundant and should be removed. Originally, they were too close to existing traffic lights: this apparent compliance with citizens' needs has the side-effect of increasing obesity. The Maryfield set was never commissioned. The set near the Church of the B.V.M. was originally to serve Massgoers who parked on the tennis courts opposite. The courts have now been built over by the Springvale development.
- The traffic lights at Anna Livia bridge should be replaced with a rubber cone roundabout. At junctions where space is confined, cone roundabouts are more efficient at traffic throughput than traffic lights. A good example, which has functioned well for a number of years, can be seen at the junction of Farnham St. and College St. in Cavan town. The pavement on the river side was built out some years ago. It did not facilitate pedestrians, but rather those who illegally parked cars and rubbish bins. It should be removed. On the other side, at the barber's, the nose of the footpath might be trimmed back by c. 1.5m.
- The bus stop at the top of the Old Lucan Road could be indented into the Knock Riada grounds, with the landlord's (DCC's/Cluid's) consent.
- Casual observation would suggest that, relative to their respective traffic volumes, the traffic lights at the Kylemore Road slip to the Bypass would appear to favour traffic going down the Kylemore Road, rather than traffic coming up the Kylemore Road and U-turning right onto the slip road.
- Perhaps, following a traffic count, the Bypass-bound traffic from Kylemore Road might be given an extra c. 20 – 30 seconds.
- On Old Lucan Road, the sleeping policemen from before the hotel to the Kylemore Road lights should be removed from the bus lane.

- The bus stop outside St. Patrick's National School should be moved to a 3 bus indent in the parking spaces in front of Linders' car showrooms.
- The number of bus stops on the Chapelizod Road between the Chapelizod Park gate and the South Circular Road should be examined to see if they can be reduced, in order to improve journey times.
- Insofar as possible, the two main remaining sets of traffic lights at Kylemore Road and the Mullingar House pub should be synchronized to create a "green wave".
- In the transport hierarchy, the top spot goes to pedestrian, cycling and public transport. And if choices have to be made between those three, pedestrians are first and public transport third. In the case of Chapelizod, we would suggest that public transport i.e. buses, be placed first.

1.3. The inward bus journey through the village from the Bypass exit onto Old Lucan Road up to the junction with the SCR is 3.7 kms. long. The outward journey takes 4.5 kms. – somewhat longer because of the loop up to the Bypass at journey's end. In comparison the inward journey on the Bypass from the slip road to Old Lucan Road to the junction of Colbert Road with the SCR takes 4.0 kms. – somewhat longer than the traditional inward bus journey through the village.

To arrive at a journey time for the inward route, we have divided its length into two sections viz.

- **Unconstrained:** On these sections, traffic can move freely. The first section is from the entry point to the Glenaulin bus stop and is 0.5 kms. long. The second section is from the St. Mary's stop to the SCR junction and is 1.8 kms. long. Bus journey times (to include bus stops, which average 1 each per unconstrained section) were taken at 30 kph. for the first section and 55 kph. for the St. Mary's to SCR section.⁴
- **Core village:** The core village is 1.4 kms. long, is traffic constrained and extends from the Glenaulin bus stop to the stop for St. Mary's. Last week, C.R.A. organized a series of bus journeys from end to end of the core village section during the morning peak. The average journey time (including bus stops) was 3 minutes 26 seconds yielding an implied journey speed of 24.5 kph.

Table 1 shows the results for the inward journey time through the village.

⁴ It should be noted that, unlike the Bypass, Chapelizod Road is almost traffic-free and (again unlike the Bypass) could safely accommodate a bus maximum speed of 80 kph. At an effective speed of 72 kph, this would involve a saving of one-half a minute on the current journey time.

Table 1. Inward journey times through Chapelizod

Section	Kms	Kph	Time Mins./Secs.
Entry – Glenaulin bus stop	0.5	30	1/0
Core Village	1.4	24.5 (derived)	3/26
St. Mary's stop - SCR	108	55	2/0
Total	3.7		6/26

Last week, during the morning peak, bus transit through the village to the SCR took just under 6 mins. 30 secs. If all the improvements suggested earlier were put in place, the inward journey time would be improved by 1.min. – 1 min. 30 secs. This would lower the journey time to 5mins. – 5 mins.30 secs.

Finally, one must look at the implications for cost and patronage should bus services continue through the village.

- **Cost:** This would be minimal, and would mainly comprise c. €100,000 – 200,000 to replace traffic lights at the bridge with a rubber cone roundabout. Unlike the Bypass proposal there would be no ongoing maintenance costs.
- **Patronage:** It is difficult to argue that the restoration of bus services through the village would not involve a restoration of 100% of the pre-Covid 19 level of patronage. Indeed, with Corridor 6 promising a c. 20% increase in routes/service frequencies compared to its predecessor, and given the previous gross undersupply of bus services to Chapelizod customers, patronage should quickly rise to 120% of its 2019 level.

2. Option 2: BusConnects6 goes down the Bypass

2.1. In this option, all of the BusConnects6 services to/from the west go down the Bypass, with one stop above the bridge at Chapelizod Hill Road.

Although detailed drawings and specifications have not yet been undertaken, estimates will be required in four areas in order to allow the C/B study to proceed viz.

- **Cost:** Estimates are required for both the initial investment cost and annual security/warden costs + maintenance costs of lifts, travelators etc. The job itself is small in civil engineering terms, but it is quite complicated. Our original QS advice (although hedged around with more than the usual number of caveats) was that it could cost €30m. More recently, the Russian invasion of Ukraine has played havoc with energy and heavy-side building materials⁵ prices: it would be prudent to adopt an investment cost of €50m.
- **Patronage:** What percentage of pre-Covid19 patronage will be regained? There are two reasons why a high % regain rate is unlikely. Firstly, as mentioned, there is the accessibility problem, which mechanical assistance can diminish but not abolish – leaving access mainly to the energetic able-bodied. Secondly, if as seems likely, it takes at least two years from the time buses ceased to service the village to completion of the bus stations on the Bypass, people will either suppress journeys or adopt other transport solutions e.g. buy/rent a car, arrange transport by family and friends etc. The financial and emotional investment in these solutions will not see them easily jettisoned when bus transport resumes. We would see a regain rate of 50% of 2019 patronage as the best that could be expected.
- **Bus bleeding into car lanes:** In theory, all buses should use only the bus stops or the bus lanes. In practice, bunching of buses will probably mean that buses bleed into the car lanes. Drawing on NTA's extensive traffic modeling experience, how often will this occur during peak and non-peak times, what will the impact be on accident rates, and by how much will the car-carrying capacity of the Bypass be reduced?
- **Village Marginalisation:** If the option of bus stops on the Bypass is selected, Chapelizod village will be marginalised in public transport terms. What social and economic effects will this have on the village? The difficulty in quantifying these effects must not cause them to be ignored!

2.2..As with the Baseline case, the starting point is the slip road from the Bypass to the Old Lucan Road and the finish is 4kms. later at the junction of Con Colbert Road and the South Circular Road.

⁵ Heavy-side building materials are energy-intensive in their manufacture and distribution. Typically a load of stone or readymix can double in price every 25 miles.

Fig. 2 Inward Journey down the Bypass

Section	Kms	Kph	Time Mins./Secs.
Start – Chap. Hill Road	1.1	55	1/20
Bus stop boarding	-	-	1/0 – 1/30
Bus stop - 1st traffic lights	1.9	57	2/0
1st traffic lights - SCR	1.0	40	1/30
Total	4.0		5/50 – 6/20

The figures in Table 2 are, of course, conjectural. But achieved figures are unlikely to be much different as the two main parameters – maximum speed and distance – will remain constant. Travel speeds are set just below the maximum 60 kph to allow for some bunching etc. The slow 40 kph travel speed from Con Colbert's junction with the Bypass on to the SCR reflects the unusual decision to introduce a cycle path onto an erstwhile motorway, and its negative effect on safety, on bus speeds and on car capacity. Boarding and unboarding at the bus stop may take 1 minute – 1.5 minutes. This is longer than boarding times at village bus stops, but then there are 9 bus stops on the village route compared to 1 on the Bypass route.

Summarising, journey times down the Bypass may range from 5 mins. and 50 secs. to 6 mins. and 20 secs. This is 50 seconds longer than the 5 mins. – 5 mins. 30 secs. time for the Improved Route through the village.

JJC.
8/4/2022

Appendix 2. Critique of Meeting

CHAPELIZOD RESIDENTS ASSOCIATION (Estd. 1942)

Chair: John Martin, Treasurer: Vincent Ferguson, Secretary: Jerome Casey

On 13/06/2002 Chapelizod Residents' Association (CRA) met with the National Transport Authority (NTA) to consider whether various BusConnects routes to the West should go down the Bypass and avoid Chapelizod (as NTA wishes) or proceed via an Improved Route through the village (as CRA wishes). CRA's critique of that meeting follows below.

1. The Meeting: Outcome. Chapelizod has been fortunate in its inhabitants, some of whom inspire even after death. We have already mentioned Brian Malone in relation to Accessibility. Every morning, Brian would come down his lane, turn his wheelchair left at Chapelizod Hill Road and travel c. 100m. to Kylemore Road Vocational School, where he worked as Career Guidance Officer. Brian was joined on the teaching staff by Liberato Santoro in the 1980's; Liberato was attracted by its dynamic headmaster – Anton Trant – and also by the scope which the then largest second-level school in Ireland provided. After securing his doctorate, Liberato joined UCD where he lectured in philosophy and aesthetics for 29 years until his death in 2017. Early in his tenure, Liberato organized a lecture by his friend and collaborator, Umberto Eco, on James Joyce.⁶

In a major article in *The Irish Times* the day before, Liberato summarises Eco's passion for rationality and his hatred of error and falsification by quoting a passage from "The Name of the Rose".

⁶ Umberto Eco, (31 October 1991), "Portrait of James Joyce as Bachelor", Physics Theatre, Earlsfort Terrace, UCD.

Very Sure of their Errors

RATIONALITY is the concept that characterizes the monumental work of Umberto Eco; and with rationality, the faith in our ability to unmask and denounce falsifications, the methodic commitment not to fall prey to haste and error. Eco has put it beautifully in a central passage in "The Name of the Rose":

"But then..." I (Adso) ventured to remark, you are still far from the solution...."

"I am very close," William said. "but I don't know which".

"Therefore you do not have a single answer to your questions?"

"Adso, if I did, I would teach theology in Paris".

"In Paris, do they always have the true answer".

"Never", William said, " but they are very sure of their errors".

"And you" I said with childish impertinence, "never commit errors".

"Often" he answered. "But instead of conceiving only one, I imagine many, so I become the slave of none".

The Parisian theologians whom William unmasks are frighteningly close in their attitudes and commitment to the NTA. Instead of, like William, remaining open to a number of options, even when very close to a solution, they plump for what they deem to be the true answer. They are never right in this: new evidence usually emerges. But they are **very sure of their errors**. Finally, while William also commits errors, by not limiting his options to one, he avoids being enslaved by this single, major error.

The outcome of the meeting was that the NRA refused to accept the demonstrated truth of CRA's arguments. Like Eco's Parisian theologians, they were obdurate in maintaining their position: they remained **very sure of their errors**.

2. The Meeting: Agenda. An agenda for the meeting on 13th June 2022 was proposed by CRA⁷ and accepted by the NRA. Three CRA officers would attend. Attendees for the NTA would comprise "*Colin Murdock, other colleagues with decision-making power and an NTA officer familiar with Cost/Benefit studies*". There were four items on the agenda viz.

- 2.1. Presentation on Improved Route through the village by CRA,
- 2.2. Presentation on NTA's preferred route down the Bypass

⁷ Email from Jerome Casey to Colin Murdock of 28th April 2022.

- 2.3. Discussion and evaluation of both options
- 2.4. At least four items to be considered in the cost/benefit study viz.
- Cost, both capital and recurring
 - Patronage
 - Bus bleeding into car lanes
 - Village marginalisation.

CRA began by presenting to the meeting the case for an Improved Route through the village (item 2.1) The granular detail can be found in the accompanying files.⁸ Summarising,

- The Improved Route citywards is shorter at 3.7kms., compared to 4.0kms. down the Bypass.
- The Improved Route takes a journey time of 5 mins. 0 secs. - 5 mins 30 secs. Journey time down the Bypass takes 5 mins. 50 secs. – 6 mins. 20 secs.
- Due to its inaccessibility, patronage of the Bypass route would at best be 50% of its pre-Covid level. Chapelizod patronage of the Improved Route would quickly return to 100% of its pre-Covid 2019 level and rise in the medium-term to 120% of its 2019 level.
- The investment cost of the Improved Route would be small at c. €0.3m. To make the bus stations on the Bypass accessible to all would require an investment of €30m. - €50m.
- When BusConnects switched its western buses to the Bypass, routes passing through Chapelizod now provide less than one-third of 2019 bus provision. With Chapelizod only having buses as its public transport, this leaves the village socially and economically marginalised. At the CRA/NTA meeting, the NTA argued that (older) villages like Chapelizod had to be sacrificed in favour of providing bus services to faster-growing outer suburbs. The problem with this argument is that it is wrong! – **in error**. Chapelizod's population over the past 20 years has grown by almost 3% p.a.⁹, a faster growth rate than many of the outer suburbs to which buses previously serving Chapelizod have been diverted. While it is hard to understand why this initial error occurred, it would be unconscionable to allow it to persist. The NTA must confront their **error, not continue to be very sure of it.**

⁸ Emails of 8/4/2022, 14/4/2022, 28/4/2022. Minutes of CRA/NTA meeting 13/6/2022

⁹ C.S.O. Census of Population 2016. Chapellizod's population grew from 1,855 in 1996 to 3,056 in 2016, a 65% increase, or almost 3% p.a.

Item 2.2 on the agenda was the NTA's presentation of their option of going down the Bypass. The NTA never made this presentation. No explanation was offered for the NTA's decision.

Similarly, agenda item 2.4 required an NTA person knowledgeable in cost/benefit studies to be present. None of the NTA personnel present at the meeting claimed such expertise. And like item 2.2., the NTA made no mention of a cost/benefit study.

3. The Meeting: Discussion. Four NTA personnel were present at the meeting.¹⁰ John Martin (CRA Chair) twice enquired if they had decision-making powers on this issue. He was assured that they had: that any recommendation to the NTA Board to approve or reject a proposal would come through them.

John Martin then asked if they had visited Chapelizod. Only one – Mr. John Barry – had. This persistent lack of knowledge by the NTA of the physical infrastructure of Chapelizod resulted in some odd and frankly wrong suggestions viz.

- Some weeks earlier in discussions, Jerome Casey had suggested to Colin Murdock that the Bypass had been so successful at siphoning traffic away from the old western road – Chapelizod Road – that an 80 kph bus speed might be considered for it. Colin Murdock retorted that that would not be popular with people in housing estates. **Error:** there are no housing estates along Chapelizod Road. On its north side lies the Phoenix Park. From the Chapelizod Gate to the Islandbridge Gate there is only one northside house, and it has been vacant for over 25 years. On the south side there are only rowing clubs, a running club and a playing pitch before some housing begins beyond the Islandbridge Gate. It is regrettable that, following on from this exchange, Mr. Murdock did not visit Chapelizod.
- The main problem arising from the NTA's lack of local knowledge is that they have no awareness of the insurmountable difficulties in Accessibility/Ridership terms of a Bypass bustop above Chapelizod Hill Road (v. sec. 4.2). If they had visited, they would not have remained **sure of their error.**
- John Barry and David Clements raised generalized arguments against bus indents. John Barry advised that "*they are trying to move away from indents as they need to be very long to ensure parallel parking to kerb*" A suggestion was also advanced that old bus indents could not cope with increased bus dimensions over time. **This is in error,** as an examination of the Chapelizod Court

¹⁰ John Barry, David Clements, Aiden Gallagher, Colin Murdock.

indent would have demonstrated.¹¹ Although 36 years old, the design of the Chapelizod Court bus indent has coped admirably with numerous changes in bus width and length. Buses can always park at the kerb: since its introduction, buses have never juttied out to block traffic coming behind. Davis Clements *“noted that the indent might not be required at Linders,. Indents can help at bottlenecks but pulling out can be detrimental to journey time”*. This was the **most egregious error of the whole meeting**. It had to be explained to Mr. Clements that the existing busstop at St. Patrick’s NS, when a bus was on station, blocked traffic behind (including following buses) for 60 – 90 seconds – because it is the principal busstop in the village. The only location suitable for a bus indent is Linders garage.¹² A 3 bus indent here is possible: pulling out from this would delay traffic by c. 10 seconds, whereas the current delay at St. Patrick’s is a large multiple of that. We accept that bus indents may not be preferred in new towns. But in an old village such as Chapelizod, with its narrow streets, they are invaluable in facilitating free traffic flow. And they only come along once in a generation. 36 years ago, Joe Leyden freely gifted the bus indent at Chapelizod Court to Dublin Corporation in order to secure planning permission. CRA is working to secure a similar gift of a bus indent from Paul Linders. It is very disturbing that, failing to visit Chapelizod beforehand, Mr. Clements blithely dismissed the element most important in securing an Improved Route through the village.

- Finally, at the end of the meeting, the CRA Chair twice invited NTA personnel to visit the village in order to inform themselves. But the invitation was twice refused. The NTA **were very sure of their errors**.

Not only did Aidan Gallagher not visit the village, but on a number of occasions demonstrated that he had not read the CRA documentation submitted beforehand. In spite of the Improved Option being demonstrably superior to the Bypass Option in terms of time, cost, length, Accessibility/Ridership, and Village Marginalisation, his opinion was not for turning viz. *“NTA are comfortable that the Core Bus Corridor is in the right place”, “The Bypass is more reliable. Guaranteed journey time is main objective”, Options will be assessed towards the end of the year. Based on information to now, we are in the right place with our proposals”*

Having failed to address, much less refute CRA’s scientific findings on both options, Mr. Gallagher then proceeded to use the inferior option (Bypass route)

¹¹ In fairness, Mr. Barry would have had to wait up to 30 minutes to observe two weekday, off-peak buses use the indent, because of the infrequency of the service.

¹² Paul Linders is seeking planning permission for 131 apartments.

as a template model for the superior option (Improved Route). Winging it, he claimed "*they cannot guarantee journey times through the village without road widening/land take*". No evidence was provided to show that this was based on an actual plan, nor where such road widening/land take would take place. David Clements then "*reiterated Aidan Gallagher's point about bus priority in both directions through the village requires property acquisition*". Doubling down, he thought a busgate might be needed on Anna Livia Bridge which would ban car traffic from crossing the bridge!

CRA were treated to these maunderings in response to their scientifically argued case. The meeting ended, with Mr. Gallagher and Mr. Clements both being **very sure of their errors**.

4. Preferred Route through the Village: Whither? CRA had warned Colin Murdock two months ago that the Public Spending Code required any capital project in excess of €20m. to have a Cost/Benefit study undertaken. We said that if NTA did not undertake such a study, CRA would formally complain to the Minister for Public Expenditure and Reform, Mr. Michael McGrath T.D.. While the NTA reports to the Dept. of Transport, it secures its funding from the Dept. of Public Expenditure and Reform. Colin Murdock did not respond, nor did the NTA discuss the matter under agenda item 2.4 at our meeting of 13/6/2022. Accordingly we are referring the need for a C/B study to Minister McGrath. In addition CRA will refer the following question on the Bypass bus station to the Minister: can a new public transport facility be funded if it is in breach of Section M of the Building Regulations by not being Accessible to wheelchair users?

4.1. Cost Benefit study: CRA has more than a passing interest in cost/benefit studies. In 1982 Ireland was suffering from recession, induced by the second Oil Crisis. Public investment projects were severely curtailed. Chapelizod was suffering from chronic traffic congestion, as almost all traffic to the west had to pass over Anna Livia bridge. Dublin Corporation's engineers, using Canadian guidelines, concluded that the bridge had run out of capacity in 1968 – 14 years earlier. A new Bypass route over Longmeadows Dump and the California Hills had been selected. Finance was the problem. To try to accelerate decision-making, CRA undertook a Cost/Benefit study of the Bypass in 1982. This was presented to Mr. Paddy O'Duffy, Asst. Sec. Roads, Dept. of Local Government and to his Principal Officer, John Carroll. They were particularly impressed by the Benefit : Cost ratios of 4.5 – 5.8. These were, and remain, extraordinarily high C/B returns.¹³ Paddy and John tested the exercise and agreed with the result. They brought it to the Dept.

¹³ Like Eco's William, options were presented to the policymakers. The B/C ratio of 4.5 represents a top of the range £30m. investment, involving tunneling at Longmeadows, soundproofing at St. Laurence Grove etc. The almost-cheapest outlay was selected. While somewhat disappointed with this, CRA were delighted that the project had actually been undertaken.

of Finance, who gave their assent. The Bypass was quickly built (1984 – '86): it was the only major road project undertaken in Dublin in the recessionary 80's. CRA reckon that the 1982 C/B study brought forward the building of the Bypass by a decade, because the Exchequer only returned to health by the early 1990's. CRA wishes to contrast the dedication to the truth and to scientific method of these civil servants 40 years ago, with the indifference to truth and scientific method displayed by the current public service NTA personnel with whom we have dealt.

CRA considers that Cost/Benefit and other studies are a useful guide to policymakers in assessing the comparative worth of projects. The reluctance of NTA personnel to even consider a C/B study of the two options may well be due to the fact that their option of a Bypass station will score badly. It will at best secure 50% of the Ridership of the Improved Route, and its capital cost will be €30m. - €50m. compared to €0.3m. for the Improved Route.

This reluctance to comply with the Public Spending Code is certainly not shared by the Board of the NTA. Item 14 of the NTA Board Minutes for February 2022 concerns the renewal by Iarnrod Eireann of Colbert Station in the Mid-West viz.

“Mr. Creegan explained that a full business case for the project has been prepared in accordance with the Public Spending Code and he noted that Board approval is required for capital projects and programmes with a capital cost in excess of €20m.”

4.2. Accessibility: CRA considers that the proposed location of the bus station on the Bypass breaches Part M of the Building Regulations. The Irish Wheelchair Association concurs with this opinion.¹⁴ The gradient of the access road (Chapelizod Hill Road) underneath the station is 15% and the distance-to-travel from the beginning of the road to the East-West station entry ramps is 200 – 250m. respectively.

Two months ago when Jerome Casey raised such Accessibility questions with Colin Murdock, he responded that the Accessibility Audit had been professionally carried out and that the NTA fully stood over it. This implied that the Audit had been completed and was not a work in progress. However, when he was asked for a copy of the Audit on behalf of the Irish Wheelchair Association, none was supplied. Again, at the meeting of 13/6/2022, when the NTA was asked for a copy of the Audit, Aidan

¹⁴ Muscular Dystrophy Ireland are uncomfortable with the gradient and the distance-to-travel, but cannot give an opinion until their new ceo has been appointed.

Gallagher refused to do so "*in advance of finalising all documentation*"¹⁵
Which is it? It cannot be both a finished Accessibility Audit and an
Accessibility Audit in course of preparation!

The basic question arises. If a publicly-funded facility such as a bus
station is required to be accessible to all citizens, and it is not, how can it
be publicly funded?

J. Jerome Casey,
Sec. CRA.

¹⁵ CRA have provided the NTA with c. 20 pages of documentation. The NTA has provided CRA
with zero documentation.

Appendix 3. Reply from NTA

Secretary, Chapelizod Residents Association.



29 August 2022

Re: BusConnects Dublin

Dear Mr. Casey,

I refer to your email of 2 August to the NTA Board Chairman in relation to BusConnects proposals concerning Chapelizod, together with attachments including one issued by post to us. Your correspondence has been reviewed by the Chairman and I have been asked to respond to you.

The NTA is satisfied that a comprehensive process has been undertaken in relation to the BusConnects proposals at, and in the vicinity of, Chapelizod village and that the proposals being advanced represent the optimal arrangements. In relation to the bus infrastructure proposals, it is worth noting that it will be An Bord Pleanála, not the NTA, who will be the determining body in relation to these items.

You mention two specific points in your correspondence related to accessibility requirements and the Public Spending Code. On the matter of accessibility requirements, it is the case that the existing Chapelizod Hill Road does have a steep gradient. However, while we cannot change the gradient on this road, any new infrastructure to be constructed under the BusConnects proposals will comply with general accessibility requirements in terms of geometric standards. In relation to the Public Spending Code, I am satisfied that the NTA has ensured compliance with the Code at all times.

You set out three "*conditions*" in your correspondence. In respect of those items, we acknowledge receipt of your email, confirm that it has been carefully considered and confirm that the proposal to route the Lucan to City Centre Core Bus Corridor along the dual carriageway Chapelizod Bypass remains unchanged.

I trust that the above information is of assistance.

Yours sincerely,

A handwritten signature in cursive script that reads "Hugh Creegan".

Hugh Creegan,

CRA Response to NTA reply of 29 August 2022

On **accessibility**, the letter admits that Chapelizod Hill Road is steep. Its 15° slope and the 200/250m. of travel to the east/west entrance points to the Bypass, render it impassable for wheelchairs. NTA had earlier dismissed out of hand a CRA suggestion for some sort of a “traveling road” to mitigate this. As an access to public transport, the road is in breach of section M of the Building Regulations. The NTA cannot dismiss this uncomfortable fact by asserting that “we cannot change the gradient on this road”. But the NTA can move to where the road gradient is normal for wheelchair users i.e. to an Improved Route through the village. Additionally on Accessibility, the letter claims that “*any new infrastructure (presumably to allow wheelchair users to climb from the entry up to the buses) to be constructed under the BusConnects proposals will comply with general accessibility requirements in terms of geometric standards*”. CRA are advised that at a 1 ; 20 gradient, the ramps proposed by the NTA will take c. 20 minutes to climb in a wheelchair. Such a duration, merely to access a bus, is also in breach of section M of the Building Regulations.

The NTA letter writer, Mr. Hugh Creegan, is also in error in claiming that the NTA is not in breach of the **Public Spending Code**. The NTA were advised on 8/04/22 by CRA that as spending on the Bypass bus stop would exceed €20m. that a cost/benefit analysis was required under the Public Spending Code. The NTA did not accept this, as nothing appears to have been done. Further at the meeting of 13/06/2022, no cost/benefit expert was present for the NTA, as had been agreed beforehand, and no C/B presentation was made. Further, Mr. Creegan is quoted in the NTA Board Minutes for February 2022 (v. Appendix !) as follows

“Mr. Creegan explained that a full business case for the project (Colbert rail Station) has been prepared in accordance with the Public Spending Code and he noted that Board approval is required for capital projects and programmes with a capital cost in excess of €20m.”

Mr. Creegan notes in his letter “*I am satisfied that the NTA has ensured compliance with the Code at all times*” However, in the light of the above, Mr. Creegan will have to accede to any request from the Dept. of Public Expenditure and Reform to produce a Cost/Benefit study of the Bypass bus stop, to demonstrate that it had been undertaken before May 2022 (shortly after CRA’s warning) and that the benefits of such an investment exceed its costs.

Appendix IV

The Accessibility of the Proposed BusConnects Bus stop on Chapelizod Bypass

This submission comprises the views of both The Irish Wheelchair Association (IWA) and Muscular Dystrophy Ireland (MDI)¹⁶. While the submission is generally concerned with all limited-mobility, potential bus passengers, it is particularly concerned with wheelchair passengers. It presents an overview showing the height which passengers must climb merely to access a bus, how the access to the bus stop entrance along Chapelizod Hill Road, is in breach of Document M of the Building Regulations¹⁷, how the ascent from entrance to the bus stop above also breaches Document M, and summary conclusions.

1. Overview:

Fig. 1 shows Chapelizod Hill Road. It runs from the bridge (the lowest point in the village) up over the Liffey Valley wall to Ballyfermot. Its gradient is so steep that, in a pre-automotive age, carters and cab drivers refused to take their horses up it. Currently, the gradient is too steep for wheelchair use.

¹⁶ MDI has its national headquarters in Chapelizod. It is located at the junction of Kylemore Road and Old Lucan Road. Owen Collumb, Facilities Coordinator, MDI, has lived in Knock Riada for over two decades. Knock Riada is located c. 70m from MDI's HQ.

¹⁷ Building Regulations (Government of Ireland, 2022), Technical Guidance Document M 2022



The IWA and MDI consider that, barring a trained parathlete, none of their members would be capable or willing to climb 15 – 16m. merely to access a bus.

2. Access to Entrance along Chapelizod Hill Road:

We have replaced earlier estimates of height and distance along Chapelizod Hill Road, with Ordnance Survey Ireland official figures¹⁸, covering St. Laurence Road, Chapelizod Hill Road and Chapelizod Bypass.

From the entrance to Chapelizod Hill Road (10.00 m.) to the eastern entrance to the station (19.03m.), the height differential is 9.03m. The distance between both is 107m. Thus the gradient is 1:12. The maximum gradient permitted for Ramped Access Routes in Document M (v. 1.1.3.4., p. 31) is 1:12. viz.

“For the purpose of this guidance, a gradient of 1:20 or steeper is considered to be a ramp. Ramped access routes should be designed to

¹⁸ Ordnance Survey Ireland (15/12/2022), Land Registry Compliant Map, Map Series 1:1,000, Map Sheets 3262-08.

have the shallowest gradient practical. The preferred maximum gradient is 1:20 but where site specific constraints require it, ramps not steeper than 1:12 may be provided if individual flights are not longer than 2000 mm."

Each 2 m. flight must have a 1,800mm. x 1,800 landing to "act as passing places" where "the ramp has three flights or more" [1.1.3.4. (d)]: so a ramp + landing has a going of 3.8m. As mentioned, there is 107m. going available along Chapelizod Hill Road. This would allow for 29 flights + landings (107/3.8, rounded up). However, Document M (Table 2, p. 34) will only allow a maximum rise per flight+ landing of 166mm. So, the maximum rise for the 29 flights + landings is 29 x 0.166 or 4.8m. This is just over one half of the 9.03m. required. So, ramp access can only be achieved along Chapelizod Hill Road if the maximum gradient exceeds 1:12. Document M does not allow this.

Document M also requires that handrails must be provided on both sides of a raised access ramp [1.1.3.4 (e), p. 32]. Thus, a footpath along Chapelizod Hill Road will have to have numerous flat landings and handrails. The IWA and MDI consider that these would provide an unacceptable danger to those living along the road, visiting or passing by.

3. Ascent from entrance to bus stop above:

As mentioned, the OSI height at the eastern entrance is 19.03m. The height on the Bypass above is 25.02m. The height of climb is thus 5.99m.

The NTA's drawings appear to show 11 flights, each 5 m. in length, a total going of 55m. The maximum rise allowed by Document M for a 5m. flight is 0.333m. (Table 2, p. 34). Thus the maximum rise achievable for the 11 flights is 11 x 0.333 = 3.66m. This is well below the 5.99m. rise of climb shown on the OSI's official maps. Some explanation is called for.

A greater source of worry to the IWA and MDI is the combination of the height of the ascent with its length. Each flight has a landing at either end, totalling 3.0m. in length. Thus, a flight +landings is 8m. long and over 11 flights + landings the distance travelled is 88m. Coming on top of the ascent to the entrance of 9.03m. over a 107m. distance, the climb up to the bus stop of 5.99m. over a distance of 88m. is, in the considered experience of the IWA and MDI, a step too far. We would share Document M's misgivings (1.1.3.4., p.31)

"If the gradient is too steep or an individual flight too long, a person using or pushing a wheelchair may not have sufficient strength to travel up the ramp. There is also the danger of falling forwards going downhill or backwards when going uphill if the gradient is too steep".

4. Conclusions:

It is the considered opinion of the IWA and of MDI that virtually no wheelchair user will be physically able to use the proposed bus stop on the Chapelizod Bypass because its height and distance-to-travel renders it inaccessible.

Further, we consider that the design of the proposed bus stop is in breach of Document M of the Building Regulations both in its access along Chapelizod Hill Road and because of the difficulty in climbing up from the station entrance to the bus stop.

We are extremely disappointed that the design and location of this bus stop is so defective that it makes wheelchair users incapable of accessing it. New public transport facilities must be publicly accessible to all citizens.

We would ask An Bord Pleanála to reject the NTA's proposal for a bus stop on the Chapelizod Bypass.

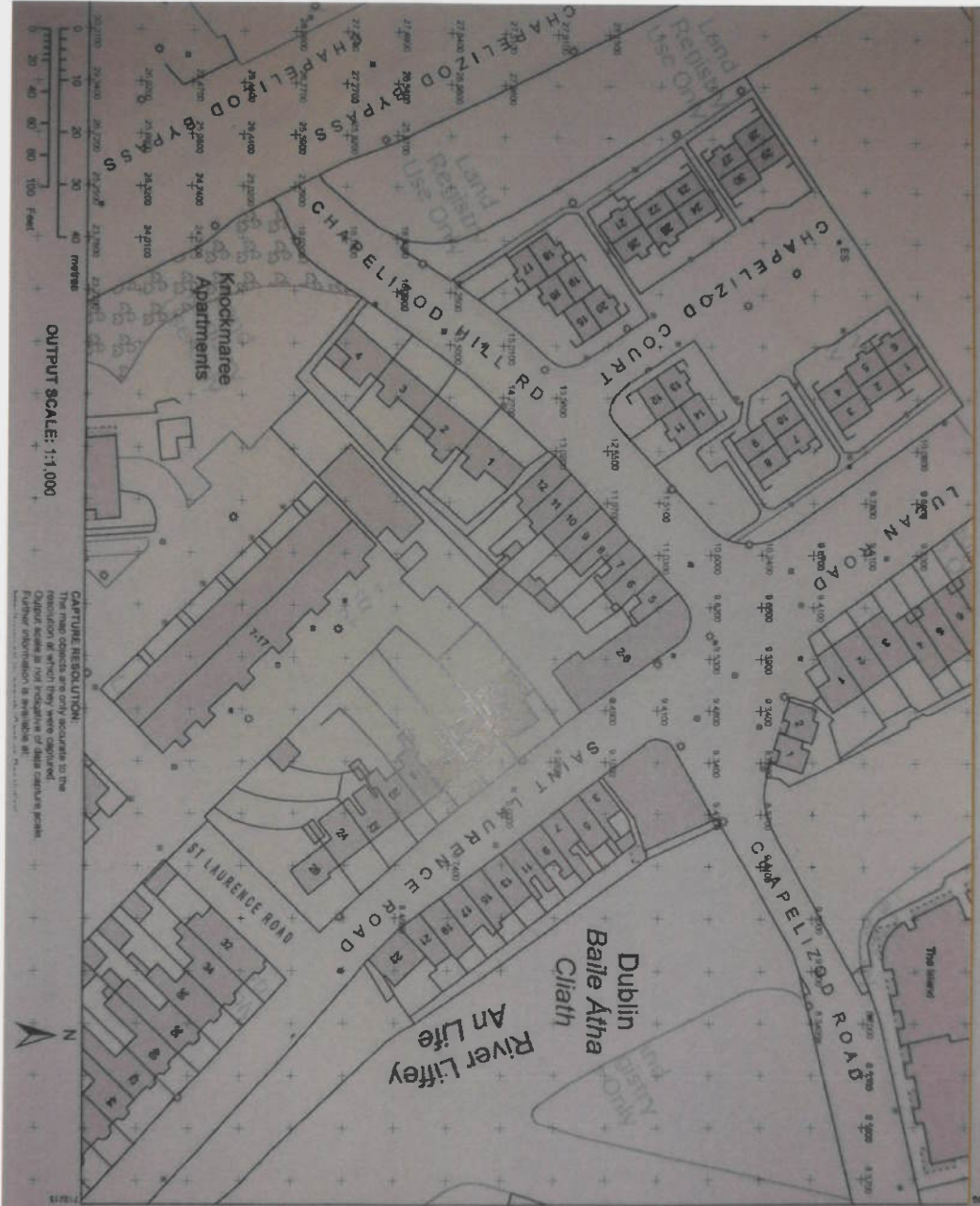
Emma Jane Morrissey

National Access Programme Manager
Irish Wheelchair Association

Owen Collumb

Facilities Coordinator
Muscular Dystrophy Ireland.

Land Registry Compliant Map



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OSI Ordnance Survey
National Mapping Agency

Appendix V: Email to Accounting Officer at Dept. of Transport

BusConnects 6 and Chapelizod

Inbox

J

Mon, Dec 19,
2022, 11:47
PM

to info

Attention of Mr. Ken Sprat, Secretary General, Department of Transport

STRICTLY PRIVATE AND CONFIDENTIAL

Dear Secretary General,

Chapelizod Residents Association (CRA) has had discussions with the National Transport Authority (NTA) since February this year concerning the preferred BusConnects6 route to link Palmerstown to the South Circular Road (SCR). The NTA Option is to proceed down Chapelizod Bypass, and thus bypass the village. CRA instead proposed an Improved Route through the Village. On researching this, CRA found that the Improved Route was superior to the Bypass Route on five criteria viz. speed, time, cost, patronage/accessibility and village marginalisation {v. App. 1}. The NTA had earlier agreed that they were indifferent as to the route chosen for this discrete section from Palmerstown to the SCR, as long as the route chosen was the superior one. CRA had expected that, following on the immense success in public decision-making in relation to dealing with Covid in Ireland that the NTA would follow a similar course - of letting science guide policy. CRA were disappointed. At a meeting on 13th June 2022 with four senior NTA executives, the NTA refused to consider much less rebut our scientific argument, instead using the old Roman Curia Argument from Authority, **Roma Locuta est: Causa finita est** [v. App. 2]. Nonplussed, CRA appealed to the Chair of the NTA, since the NTA Executive was incapable of realising the strategic impact of their maldecision. A one page rebuttal was issued in his name, which repeated the earlier NTA *hubris* [v. App. 3].

CRA had earlier warned the NTA that, if they ignored one of our concerns, that we would report the matter to Minister Michael McGrath T.D., of the DPER. The NTA's Bypass Option would cost €30 - 50m. more than the Improved Route (i.e. in excess of €20m. more) and thus would require a Cost/Benefit study under the Public Spending Code. We accepted that this is formally a matter for the Minister for Transport, but, crucially, is a financial matter for the Minister of DPER.

While sympathetic, the DPER formally referred us on to Transport. We submitted our case to Minister Eamon Ryan T.D., Minister for Transport and received an acknowledgement. Hearing no further reply, we submitted two emails to Minister Ryan (10th October, 18th October), suggesting *inter alia* that he should designate a senior Transport official to investigate the matter. CRA now would suggest that you, as Secretary General, should investigate the matter.

CRA does so because of a section in Minister McGrath's letter of referral to us viz.

Section 2.1.3 of the PSC 'Guide to Evaluating, Planning and Managing Public Investment' states that "it is the responsibility of the relevant government department to ensure that the procedures are in place to ensure compliance with the Public Spending Code within their department/office and within the bodies under the aegis of their department." For BusConnects Dublin, the Department of Transport is the relevant Parent Department. All matters pertaining to PSC compliance of the scheme in question are therefore the responsibility of the Accounting Officer of the Department of Transport. In light of the above, the concerns you have raised in relation to the BusConnects Dublin are a matter for the Department of Transport.

As Accounting Officer of the Dept. of Transport, CRA now asks you to investigate the NTA's failure to undertake a Cost/Benefit study and also their failure to furnish both CRA and the Irish Wheelchair Association with an Accessibility Audit for the proposed bus stop on the Bypass, which they initially claimed had been undertaken by March 2022, but subsequently claimed was still in preparation in June 2022. We would also ask you to apprise us of what sanctions your Department intends to apply to the four executives at the June 13th meeting and the two representatives of the Board for their actions in this matter.

To speed up your deliberations, CRA is referring this matter to your auditor, the Comptroller and Auditor General. I am sure the Comptroller will be interested in why the NTA is persisting with a project which is not accessible to wheelchair users and which will waste €30 - 50m. of public funds, when compared to CRA's Improved Route through the Village.

Mise le Meas,

J. Jerome Casey,
Sec. CRA.

