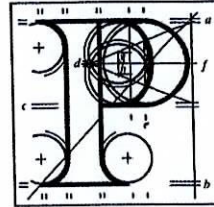


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Stephen Woulfe  
15 Victoria Road  
Rathgar  
Dublin 6

**Date:** 16 August 2023

**Re:** Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme  
Templeogue/Rathfarnham to City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.


Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

Yours faithfully,

  
Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

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Stephen Woulfe,  
15 Victoria Road,  
Rathgar,  
Dublin 6

To Bord Pleanala : Ref 316272

## **Synopsis of the basis of objection**

### ***Bus Connect***

***A missed opportunity, with a flawed mode of transport proposed on the key arterial routes, misaligned with the concept of a coherent transport strategy, approved policy stances, failing to deliver a clear “public good”, or post Covid19 way of living which embraces the concepts of the 15-minute city and improved work-life balance, creating significant negative environmental impacts.***

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## Grounds for objection

In general, the submission for Bus Connect falls short of what should be expected of any government body or agency. In terms of the broad conceptual expectations of the delivery of infrastructure projects, which should create a positive contribution to people's lives (once completed), and enhance the long-term viability of the city, it fails to credibly articulate the capacity to deliver on these fundamentals.

- **On this basis, I request An Bord Pleanála rejects the applications, requesting the responsible state bodies to undertake a comprehensive review of the transportation long-term needs of the city, taking into consideration in a more complete manner the implications on the quality of life of residents, the integration with other strategic objectives (such as the 15 minute city), adopting a modelling approach appropriate to Irish modalities (rather than USA modalities) to better implement a positive solution, supporting citizens. Such analysis should be required to consider more comprehensive transportation options, including the blending of transport modes on core arterial routes, to specifically consider overground tram, underground/overground metro, together with the integration of cross route small bus transport.**

On the specifics of the content of the application, there is a material gap between the standard one expects of such submissions, and the content of the Bus Connect application. In addition, it contains what can politely be described as inaccurate information, but this may be to kind.

- **On this basis, I request An Bord Pleanála rejects the applications, requesting the responsible state bodies withdraw all related applications, examine in a more realistic and holistic manner the impacts of proposed changes to traffic flows, and provide an honest reflection of those impacts in a single omnibus submission for all of the Dublin Bus Connect project.**

And on the approach to public consultation, this has been wholly inadequate and unfair. To provide a comprehensive accurate response to the submission requires significant knowledge of many technical areas, together with copious amounts of time to digest and articulate perspectives. The failure to provide independent consultancy to the public, as has been done in some previous infrastructure projects of this nature, creates significant distrust in the process, and combined with the inaccurate information in the submission, raises significant questions as to the motivations behind the application and its credibility.

- **On this basis, I request An Bord Pleanála rejects the applications, requesting the responsible state bodies, when preparing the new single omnibus submission, provide for independent consultants to be available to the public for engagement.**

With regard to environmental impact, the submission both contains elements which have a significant negative environmental impact, and fails to properly consider the environmental impact of the proposed scheme, and ignores potential other better alternatives. Information provided is sub standard, and arguably fails to comply with the "Aarhus Convention" legal obligations on the state.

- **On this basis, I request An Bord Pleanála rejects the applications, requesting the responsible state bodies, resubmit, ensuring full compliance with the "Aarhus Convention".**

My submission aims to cover the following areas:

1. Inaccurate and misleading information intentionally provided in the submission
2. Flawed modelling approach
3. Lack of coherence to long-term strategic objectives of the state
4. Failings regarding delivering on the key concept of "public good"
5. Poor and unfair public consultation process

## Overview

The proposal fails to provide a future proofed approach to incremental transport infrastructure development, a key pillar of the "Project Ireland 2040" philosophy, is contrary to the Climate Action Plan (2023). As outlined in section 2.3.1

While the transport map has a clear logic in terms of flows of people, it is fundamentally flawed in the mode of transport in the key arteries, fundamentally flawed in terms of road widening and excessive closures, fails to recognise and accommodate transversal local flows (e.g. school, local club, shopping, etc) with catastrophic impacts on the swathes of people and communities not part of the "flow of people" being transported directly to the centre of town from the periphery, which are in the minority in comparison to the people in the local communities. The significant increase in distances to be travelled due to a significant level of road closures and turn restrictions, will create a significant increase in local pollution and is contrary to the Climate Action Plan, having a material negative environmental impact.

The proposal permanently destroys urban village life through the removal of both "green belts" of trees and gardens which connect these historic villages, which are relative oasis in the city, currently cost free to the state, and with their removal creating a significant increase in road surfaces, for a mode of transport which should be gone within the next 40 years. **This will create a clear negative environmental impact which is not acceptable and contradicts elements of the primary objectives of the proposed scheme, which is intended to deliver in line with the Climate Action Plan (2023) creating valid grounds for the rejection of the proposal, and I would urge ABP to take this into consideration when arriving at a decision.**

Urban village life, ironically after many years of trying to be rejuvenated, has taken on renewed vigour with a greater focus on local amenities and village centres during Covid19 restrictions, a small silver-lining from the pandemic. **This should be preserved and enhanced through additional public amenity space, not now destroy through restricting local movements and accessibility to shops, amenities and public spaces, and in doing so creates valid grounds for the rejection of the proposal, and I would urge ABP to take this into consideration when arriving at a decision.**

Fundamental flaws of the current transport system, i.e. bottlenecks, cannot be addressed through the implementation of the Bus Connect proposal. Proposing a project to address an issue which then fails to address the issue by virtue of the mode of transport is a failure. **We should not compound the initial error in judgement in planning by wasting state finances on this project, only for it to not deliver the basic objectives, and as such I would urge ABP to take this into consideration when arriving at a decision and reject the proposal.**

The project has been blinkered to alternative modes of transport, with no meaningful analysis provided, or apparently undertaken, to "compare and contrast" the cost benefit analysis of different modes of transport. Ultimately the mode of transport in the arteries is the issue. Many of the bottleneck issues and the destruction of urban village life could be addressed by a simple "cut and cover" project, running a single-track metro underground, with a single track directly above overground. Failing to properly consider more reasonable long-term viable transport options reflects very poorly on the overall management of the project and their openness to identifying the most appropriate solution, not only considering bus transport, which will be rapidly outdated. **The proposal also appears to fail to understand local travel routes and needs based on extensive after school activities which crisscross the Bus Connect proposed corridor which will be closed to car**

**transport, and not capable of being replaced by the proposed Bus connect. Adopting this proposal will most likely significantly reduce the capacity of our children to participate in after school activities, which is counter to government strategic objectives with regards to children and their participation in sport, creating valid grounds for the rejection of the proposal, and I would urge ABP to take this into consideration when arriving at a decision.**

## Inaccurate and misleading information intentionally provided in the submission

### Inaccurate and misleading information provided in the application.

The proposal as submitted articulates some modelling details of the implications on traffic flows etc. It does so however in isolation of the other Bus Connect projects, which also have extensive traffic changes, but are not considered in a coherent holistic context, **creating valid grounds for the rejection of the proposal, and I would urge ABP to take this into consideration when arriving at a decision and reject the proposal.**

Consequently, it is completely unknown what the implications will be on traffic volumes, flows, timing for journeys, and the restrictions on basic essential journeys for vast swathes of individuals across urban communities, **creating valid grounds for the rejection of the proposal, and I would urge ABP to take this into consideration when arriving at a decision and reject the proposal.**

The application fails to understand how daily life in Dublin happens, with indications of no understanding the basic family dynamics along the route, the availability and use of local public and private amenities, nor the basics of running a family. **The failures in understanding, linked to the use of USA traffic modelling hypotheses, creates valid grounds for the rejection of the proposal, and I would urge ABP to take this into consideration when arriving at a decision and reject the proposal**

The extent of some of the misleading information, especially on traffic implications, is so blatant as to be considered intentional. To me it is questionable the ethics of the department which prepared and submitted such an application, knowingly signing off attesting to the accuracy of the information. **If they were not aware of the blatant errors and omissions, they should not be in their roles, given the Bus Connect project is intended to be a comprehensive solution, so not being aware of the bigger picture and understand the dynamic of the project more generally, the application should be immediately rejected for abject failure to provide coherent information.**

## The fundamental premise of the submission is flawed and outdated

Conceptually the basis and future orientation of the city of Dublin has fundamentally altered since the embryo of Bus Connect was conceived.

The combination of factors, including material changes in attitude to work-life balance and working patterns/locations due to Covid19, the aspiration of the 15-minute city, and the significant advancement in technologies, have resulted in the original plan anchoring on bus transport now appearing flawed, while no reasonable analysis of the current benefits of metro/tram alternatives have been considered. The out-of-hand dismissal of alternatives due to higher initial capital investment demonstrates a lack of understand of the real components which should be considered in a comprehensive cost-benefit analysis for long-term infrastructure projects aimed at improving the quality of life of the people for whom government departments should serve.

The issue now is that, rather than considering these fundamental changes, the submitting authority appears to be blinkered.

While appreciating that there could be a perception of “wasted public money” in not proceeding having invests so much so far, continuing this path is far more wasteful in expending scarce capital on a project which will not deliver the vision of the future of Dublin which is now aspired to.

Compounding these core issues relating to the conceptual misalignment with current reality and expectations, the proposal also materially falls short of a pillar of the original concept, namely reducing the commuting times for those who would use the service (noting there are but a fraction of the people who would be impacted). Failing to deliver on such a basis concept begs the question why capital expenditure of such scale would be considered. **I would urge ABP to take this into consideration when arriving at a decision and reject the proposal, requesting the applicants to refresh both their assumptions and the underlying hypothesis of what is now need in a new post-Covid19 society.**

Additionally, the proposal does not serve those people impacted most, through a material reduction in the number of stops, increased distances from people’s homes to those stops, thereby reducing the usability of the service (especially to the elderly and mobility impaired) forcing them into use of cars or other private means of transport, counter to the conceptual objectives of the project.

Finally, while the project does offer some benefits in terms of cycle routes etc, these are concepts which can be adopted irrespective of the Bus Connect proposed destruction. Disentangling cycle route improvements from this proposal would be beneficial and logical. Bus Connect seems to want to cling on to the benefits for cyclist as a new justification for the whole project, demonstrates the extent to which it fails as an infrastructure project proposal.

## Flawed modelling approach

**The submission contains extensive information on the modelling approach used to justify the project. It is however fundamentally flawed, to the point where the conclusions cannot be relied upon, creating valid grounds for the rejection of the proposal, and I would urge ABP to take this into consideration when arriving at a decision and reject the proposal.**

Modelling traffic flows assuming only the changes in one route materially ignores the implications of the changes in the other routes. Compounding this is that there are material unknown aspects related to local road closures, turn preventions, and general prevention of traffic flows in peripheral streets around the arterial routes. Combining all proposals, with all road closures, turn preventions and flow disruptions should be a minimum analysis set undertaken. Conceptually it is challenging to understand how such a proposal can reach the stage of submission without properly considering the traffic implications in totality, nor the implications on all the urban villages, the residents, their communities, clubs, shops and amenities.

The modelling also does not demonstrate any understanding or explanation of the adoption of alternative modes of transport and their implications on traffic flows. This is a reasonable expectation when such capital is being expended. How can we reasonably support such a destructive proposal when other options are not fully considered. **While it may not be the ABP role to opine on the correct choice, the lack of information submitted to model and justify the choice of such an infrastructure project should be grounds for rejection of the proposal.**

Even if we ignore for a moment these fundamental errors in analysis, the modelling also appears to fail in the consideration of how family life flows day to day. Locally there is considerable cross arterial route traffic flows in short hops, repeatedly, each day, especially in the time window between 3pm and 9pm. These journeys cannot be completed by a bus and relate to the constant flow of people between local amenities, partaking in after-school activities (often not located at their school), sports, or other recreational activities such as music or dance and such like. **Failing to do so creates valid grounds for the rejection of the proposal, and I would urge ABP to take this into consideration when arriving at a decision and reject the proposal as the basis application is flawed.**

While the modellers may try and explain away all these issues, the fundamental errors in so many aspects of the modelling nullify any efforts to do so. One has to wonder about the level of actual groundwork which was undertaken, instead relying on looking at computer models to determine the fate of several hundred thousand people for the next century or so.

One also must question the role of the government departments involved in contracting such modellers, what oversight they had, their expertise to challenge the assumptions used, in what appears to be a failure in their role.

This is a striking failure of appreciating their role in society as a government department.



## Lack of coherence to long-term strategic objectives of the state

The volume of government strategic documents is extensive, challenging for a lay person to digest in totality, but from my understanding of the nature and thrust of the strategic approach to long-term infrastructure investment, I sought to consider the extent to which the proposal aligns or contradicts the broad strategic intent.

In short, in my opinion, there are strong arguments against approving an application, which appears to contradict the "Project Ireland 2040" philosophy outlined in the opening articulation of the policy, while the "Transport strategy for the Greater Dublin Area 2016-2035" contains contradictions within itself. The striking contradictions with the Dublin 15-minute city strategy is also apparent.

- The proposal is misaligned with key objectives of core strategic policies for the future of Ireland and the Greater Dublin Area
  - o It has a blinkered view of "cost" which does not accurately quantify the negative "cost" to local urban villages, as such it does not abide by the Project Ireland 2040 philosophy 'to make Ireland a better country for all and to build a more resilient and sustainable future'
  - o Proposal is a "short term" sticky plaster rather than a substantive solution to a problem that has yet to fully materialise.
- The arterial routes have an inappropriate and limited life transport choice.
  - o The use of buses is adopted in most cities as a secondary linking transport system, not primary transport methods.
  - o For arterial routes Dublin should adopt instead "cut & cover" "under & over" metro/tram to rapidly transport people out of the city, occupying a single lane on the surface, in a way which avoids damaging the existing areas, and revitalises peripheral areas by allowing people living there return to their local communities and spend locally on retail and grocery.
  - o The flawed "quantification in costs" to reject the light rail or metro options will have significant long term negative and very costly implications on the state.
- Proposed plan is now outdated due to a rapid change in culture to work location, local urban focus and work life balance
  - o It would destroy a revitalised and rejuvenated series of Dublin villages, which are the essence of what makes Dublin unique in modern medium sized cities
  - o It fails to achieve its stated objectives, and where it partially does, at great cost to communities, businesses, and individuals.
  - o It is not congruent with the welcome concept of the "15-minute city" adopted by Dublin City Council, castrating local village communities which are at the heart of that concept.

In summary, the proposers and sponsoring government department should be requested to provide a comprehensive review and realignment of their proposal, taking due consideration of the approved public strategy policies adopted by the State and Dublin city councils.

## Failings regarding delivering on the key concept of “public good”

The overall concept of delivering on “public good” is one that should ensure that the interests of the many (i.e. society in general) are at the forefront of what government, the civil service, and those appoint by them should seek to do.

Given the lack of tangible “benefits” at the end of the delivery of the project, with derisory time changes in the limited busses which will run, they are considerably outweighed by the tangible “costs” should the project go ahead.

The calculation of “cost” by the project appears to have taken a blinkered view in a limited financial meaning, demonstrating a lack of even understanding the concept of “public good” or how to measure it.

A simple cost / benefit analysis table could look something like this:

| Cost  | Benefit  |
|---|--|
| <p>It removes bus services from those most in need (immobile, elderly) by reducing the volume of stops on the routes.</p> <ul style="list-style-type: none"> <li>• Reduction of bus volumes</li> <li>• Increased distance between stops</li> </ul>  | <p>Some limited improvements in bus journey times</p>  |
| <p>Vast destruction of historical urban village life</p> <ul style="list-style-type: none"> <li>• Destruction of ancient tree lined streets, creating concrete jungle highways which will be obsolete, but permanent within a generation or two</li> <li>• Significant increase in family stress due to diversions to attend local activities within local village environments, within a distance of 2km, impacting negatively on quality of life of many thousands of local children.</li> <li>• Dramatic increase in local car usage due to extensive road closures, which are not being made public, necessitating journeys multiple times the length of current routes</li> </ul> <p>Destruction of local footfall across urban villages, with likely closure of many local shops and amenities.</p> | <p>Some additional cycle routes (but these can be achieved without this project so do not need to be linked)</p> |

While I appreciate this is an overly simplified cost versus benefit table, I struggle to see how we have gotten to a place where this simple analysis does not appear to have been undertaken, the implications understood, articulated, and then addressed in a meaningful way.

While being overly simplistic, it does serve to show that the interests of the few are being placed ahead of the interests of the many, hence my reasonable conclusion that this project is failing to deliver on the basic premise of delivering a public good. **As such I would urge ABP to take this into consideration when arriving at a decision and reject the proposal.**

## Poor and unfair public consultation process

The BusConnect project can politely be described as one which is being "railroad" through, ignoring feedback and lacking any meaningful consultation with the public.

The complexity of such a project should have afforded the appointment of independent consultants which the public, or groups of the public, could engage with to seek information on the proposal. As it stands there is significant lack of trust in any information emanating from the project due to the combination of i) poor communication, ii) inaccurate information, and iii) a clear lack of knowledge of the routes through which they are planning on implementing this inefficient service.

One must question the motives behind such avoidance. Is it due to knowingly understanding that this project would fail to deliver on key objectives, but push through anyway, collecting handsome fees and salaries? Or is it a more fundamental failure to understand how to engage with the public for whom they are supposed to serve. They appear to be self-serving, not serving the public. (Which has alarming analogies with the weekend destruction of the original tram bridges many decades ago, which then needed to be rebuilt at great cost for the Luas.)

Either way, their lack of engagement and poor treatment of the citizens of the country has resulted in a poor attempt to implement what should be a transformational infrastructure project.

I have a full-time job and family commitments. Over the last few months, I have expended considerable time to try and understand this project, it's implications on both the community around me and myself, especially given the need for improved infrastructure for the future. This has been challenging to say the least. I am neither an engineer nor a lawyer, but I am a civil servant with a primary role in delivering the highest standards of "public good" in the field which I operate. In my humble opinion our public representatives sponsoring this project and those in leadership positions have fallen considerably short of this standard of delivering for citizens of this country and should be held accountable.

**As such, the only plausible outcome at this juncture must be to reject outright the application on the grounds of failing to provide the minimum information for a submission, in a way which is seeking to intentionally mislead ABP through the siloed approach to their submission process.**

## Links

### *Project Ireland 2040*

<https://www.gov.ie/en/campaigns/09022006-project-ireland-2040/#>

### *Transport strategy for the Greater Dublin Area 2016-2035*

<https://www.nationaltransport.ie/wp-content/uploads/2020/08/Transport Strategy for the Greater Dublin Area 2016-2035.pdf>

### *Dublin City Council "15-minute city"*

<https://councilmeetings.dublincity.ie/mgConvert2PDF.aspx?ID=35933>

### Climate Action Plan (2023)

<https://www.gov.ie/pdf/?file=https://assets.gov.ie/244355/1c421172-2901-4f9e-baa5-6e4445b342f4.pdf#page=null>