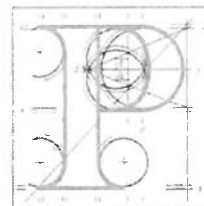


Our Case Number: ABP-316828-23



**An
Bord
Pleanála**

Brendan Heneghan
88 Parkmore Drive
Terenure
Dublin
D6WX657

Date: 03 April 2024

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

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned proposed road development. The contents of your letter have been noted.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

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

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

Tel	Tel	(01) 858 8100
Glaao 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

Lauren Griffin

From: Lauren Griffin
Sent: Tuesday 2 April 2024 13:29
To: [REDACTED]
Subject: RE: Tallaght Clondalkin ABP 316828-23

A Chara,

The Board acknowledges receipt of this email, official acknowledgment will issue in due course.

Kind regards,

Lauren

From: Brendan Heneghan [REDACTED]
Sent: Monday, April 1, 2024 9:53 PM
To: LAPS <laps@pleanala.ie>
Subject: Tallaght Clondalkin ABP 316828-23

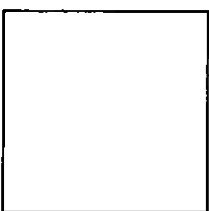
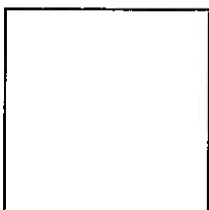
Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Bord

I refer to your letter of 26 February

Crumlin Road adjacent area

The photos immediately below in this further submission are respectively of Downpatrick Road and Slane Road, two narrow residential roads in Dublin 12. If permission for the Tallaght Clondalkin corridor is given, these roads will become the key exits from a significant area of Crumlin and will be completely inundated with traffic.



This is because exit to both Crumlin Road and Sundrive Road will be blocked by a series of bans, most notably a bus gate at Clogher Road. All of these bans are part of the planning application.

The wholly inadequate surveys conducted by the secretive NTA model is a bit random as to whether it picks these things up. But it did indeed pick up in the paperwork used for the limited consultation that Downpatrick Road would be an issue. I note the NTA response does not deal at all with the specific issue of Downpatrick Road raised by me. I am sceptical that the model was told about the bus gate at Clogher Road, but as it's a secret, we don't know.

The problem arises because between the junction of Windmill Road/Crumlin Road and Clonmacnoise Road/Sundrive Road, the following routes are blocked off: Clonard Road, Bangor Drive and Clogher Road, leaving only the option of Slane/Downpatrick or the very difficult right turn ex Old County Road. It is also inevitable that city bound traffic when reaching the Clogher Road bus gate will divert left into Slane Road. There are also concerns about Saul Road which links from Kildare Road to Downpatrick Road.

The wider area problem

The whole area from Crumlin Road as far as Ranelagh Road is premised on traffic being forced off the main roads and pushed into secondary roads and an overall reduction in car traffic as a result. This might just about work were NTA to double the number of buses and to increase the number of and service level on the cross city S routes. However the fact is that there are no new buses in this area and in the reaches within the M50, extra use by those outside the M50 will mean that those living inside the M50 cannot access the buses. Further 12 spines and orbitals were promised almost six years ago, but only half have been delivered, so we might have to wait until 2030 for full rollout. I would not dispute that there is a pressing need in the south Dublin area for a major transition from car to bus; the buses however are not being delivered.

Generally for this Crumlin area, I fundamentally dispute the assertion in the response to me at page 366 that *"In summary, the cumulative impact of the Tallaght/Clondalkin scheme and the Kimmage bus corridor scheme on Stannaway Road has been assessed and concluded that the two schemes have the effect of constraining the opportunity for traffic to displace onto adjoining / adjacent roads when compared to the effect when only one of the Core Bus Corridor schemes is operational. In addition to this, with all the Core Bus Corridor schemes operational, there is predicted to be a higher modal shift from private car trips to sustainable modes of travel compared to the singular scheme scenario"*.

1 I do not think the Tallaght Clondalkin corridor of itself has any impact on Stannaway Road in itself; it is simply too far away. If only the Tallaght Clondalkin Scheme is operational, it is in my view highly unlikely that any traffic will divert to Stannaway Road. There is no obstacle at all to city bound traffic remaining on Crumlin Road save the "car stacking" in the section of Crumlin Road adjacent to the junction with Clonard, by virtue of the bus priority light. If traffic diverts to avoid this, it is likely left through Drimnagh or right via Kildare Road.

2 The Stannaway Road problem is caused primarily by the Kimmage Corridor which is diverting a lot of traffic into Cashel Road and Captains Road, both of which lead to Stannaway Road. It is accepted even by NTA in their own modelling that there will be a lot of extra traffic on Stannaway

3 the Stannaway Road problem is also partially caused by the Templeogue Rathfarnham scheme which will divert traffic left at Wellington Lane. One of the obvious outlets of the Wellington Lane "pipeline" is Stannaway Road. This is really an issue to be addressed in the context of the Kimmage corridor but I think the two schemes have exactly the opposite effect to "constraining the opportunity for traffic to displace onto adjoining/adjacent roads" but rather force traffic there

Modelling for this area did not provide any information for the Morning Inter Peak and the Afternoon Inter Peak. These are exactly the hours I would submit when small local roads will receive a lot of extra traffic by virtue of the sort of demand management measures being proposed for the scheme. For example, the maps at pages 134 and 136 in the NTA response clearly only deal with the AM and PM peak hour. Further an increase of 80 vehicles per hour would be noticeable in a small residential road, but these are not picked up by the modelling. I think local residents should get exact figures for every road and not very large scale maps lacking any local focus. The quote on page 136 suggests that the only thing NTA care about is the capacity of Kildare Road and Sundrive Road, not the loss of amenity for residents.

I note in bus corridor planning applications granted to date by the Bórd, there tends to be a conclusion that the development has *"positive long term impacts on population and human health through facilitation of improved*

pedestrian and cyclist safety...., reduced traffic congestion, improved air quality and noise reduction, improved road/street safety, more social interaction and positive accessibility and amenity impacts for community areas”

I do not believe that any proper assessment could reach that conclusion for all the residential roads to the immediate south of Crumlin Road. Rather it is a very big NEGATIVE.

Bus services

I think the core of the problem here is that NTA want to divert people from their cars to the bus, but they don't actually want to provide any extra buses. I invite you to read points 1 to 4 of their response document pages 357 to 362. It is complete waffle and does not address.

A The fact that the five D services (see map page 360) running on Crumlin Road and The Coombe have a proposed frequency in the aggregate of 16 an hour and indeed have a proposed frequency of 8 an hour on Greenhills Road, less or at most equal to what currently obtains

B The loss of the 17, 18 and 83 services in the estates to the south of Crumlin Road; this was an issue aired on Joe Duffy Liveline some months back, with its devastating impact for the less mobile

C The replacement of a more frequent 150 service on Kildare Road coming from (relatively nearby) Templeogue by a much reduced 71 service coming from Tallaght.

So the people in the area to the immediate south of Crumlin Road are being punished twice over by the provision of less buses and by access to their houses being much more difficult.

Further I think all of this means less reliable bus services for the Crumlin area, so it is a negative long term impact for that area.

Consultation

This entire project is tainted by non consultation and I have to say this is a key concern for me. The public have been treated with utter contempt by NTA. Consultation implies that they listen to you which they absolutely have not done.

I think the area of Crumlin and Kimmage to the south of Crumlin Road was never informed by NTA of the fact that the scheme has an impact for their area. No brochure was dropped in the doors of those roads flagging the closure of Clonard Road, Bangor Drive and Clogher Road. No brochure was dropped saying the 17 and 18 buses were being taken away and that the 83 terminus in the estates was being removed. I think to this day people are not aware of most of the measures, except the ones that have happened. It is asserted by a submission quoted on page 147 that there was no consultation; I believe this to be true. The NTA response merely quotes the three stage consultation and does not set out any specifics of consultation with locals. I think you should accept the evidence of the person that they were not consulted.

I don't see the point of paragraph 6 of their response to me. I am not saying that I personally did not have an opportunity to comment, but I am saying that the clear deficiencies in the notification process have resulted in a situation where others more heavily affected were not put in a position to comment. It is not true to assert that “the Bus Connects Infrastructure team sought to gain maximum engagement from the public from the commencement of the CBC Infrastructure Works to raise awareness, establish relationships and gain immediate insight and knowledge of the issues at an early stage” page 363 of response.

Metro

I think the plan is defective because it should have (and has not) considered a metro alternative. I think the conclusion of the GDA Transport Strategy that metro is not economically justified page 368 of response) is simply wrong. GDA relied on a flawed study entitled MetroLink to Knocklyon which was conducted without any public consultation. This is shown by a paper submitted at the MetroLink oral hearing which proposed a metro to Tallaght. This paper estimated that this, as an extension to MetroLink, had a cost benefit ratio of between 1.6 and 2.2 and could be delivered for between €2.5 billion and €2.75 billion. This paper is in the possession of the Bord under reference 314724 and I ask that you should look at it in outline. While I agree that additional infrastructure and cycling infrastructure would be required even if there were a metro, metro would remove many of the very objectionable features, so it is essential that it is properly assessed.

City Edge

I think this project to provide 40,000 new homes and 75,000 jobs has been inadequately considered in the planning documents. The quotes from Appendix A2.1, contained at page 368; are not a proper assessment. They seem to treat the plan with contempt. It has according to NTA merely been "noted" by the two councils. It is non statutory; it is merely a "vision".

The quotes do make it clear that the provision of active and public transport is key

"Movement Focus development on the provision of active and public transport. Ensure Transport Oriented Development by focusing new mixed use and compact urban development on enhanced active travel and public transport corridors"

They fail to note that corridor CBC 08 and CBC09 are indeed the same as the Tallaght Clondalkin proposal. It is very dubious that 16 buses an hour can possibly cope with the demand from this source and I believe any proper planning application would have thoroughly discussed the endurance level of the proposed infrastructure for the type of bus services that City Edge might require.

City Edge is a project rather like the early stages of BusConnects. It is ridiculous of NTA to not deal with it properly in its submission. South Dublin Co Co is advancing a variation of its development plan to incorporate this. The project clearly regards this corridor as the route which will serve the current and future residents and workers of much of the City Edge area (see news city edge.ie).

Bunting Road

NTA peremptorily dismiss my suggestion of expediting Bunting Road cycle works with a statement that it is not part of the scheme. The scheme does however contain timetables for sections. All I am suggesting is that you the Bord make it clear that this work is to happen early in the work cycle and amend the timetable accordingly if necessary.

The Parkview issue

The idea of surrounding a very small development with main roads on both sides is crazy. I think the Bord needs to modify the scheme to have a main road with cars, buses and bikes infrastructure on one side of this estate only. A perusal of the map of the area would suggest that it was always intended that the estate would be passed on one side or the other, but not effectively become the median of a road network.

Time for submission

I believe that the public needs to be given more than five weeks to assess a 540 page report. I think the process is inadvertently biased towards the vastly greater resourced applicant who are afforded more time and against the public. On page 362 NTA assure us (item 6 fifth paragraph) that the law provides for an oral hearing, but the law seems to be disregarded.

Brendan Heneghan
88 Parkmore Drive
D6W X657
Send