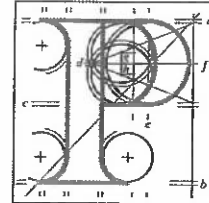


Our Case Number: ABP-317121-23



An
Bord
Pleanála

Brendan Heneghan
88 Parkmore Drive
Terenure
D6W X657

Date: 15 August 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin 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

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

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

Teil	Tel	(01) 858 8100
Glaio 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

OBSERVATION ON SWORDS CORRIDOR 317164

An Bórd Pleanála

Marlborough Street,

Dublin 1

11th August 2023

AN BORD PLEANÁLA	
LDG-	065 637-23
ABP-	317121-23
11 AUG 2023	
Fee: €	50
Type:	Cash
Time:	12:24
By:	Hand

Dear Sirs

I wish to make an observation on this scheme on the following basis

- 1 All one scheme and therefore should be all one fee
- 2 Submissions on one relevant to others.
- 3 Time savings over all schemes
- 4 Issues related to Whitehall to Terenure Corridor
- 5 Lack of consideration of obvious alternatives
- 6 Omit entire Santry section of scheme and augment with A5 service

I have an interest in this scheme, as it is the other end of the key bus services which originate in Terenure Village. It is the other half of the A spine and has implications for buses in Terenure. I am not particularly familiar with the details of the Santry section, but there are points of general principle which need to be raised.

All one scheme and therefore should be all one fee

I have made submissions on a number of corridors and I resent bitterly having to pay numerous €50 fees for what is in substance the one application. NTA have chosen for their own reasons to split the project into twelve bits and this has the effect of impoverishing the public and frustrating submissions.

The excessive demands for fees is in clear breach of environmental laws which should allow me to object to projects with a very serious negative effect on the environment without material cost. It is wrong that I should be asked to pay another fee for a corridor which is just the other end of the Templeogue Rathfarnham corridor. I am asking the Bórd to refund all fees I have paid beyond the

one fee for the Templeogue Rathfarnham corridor. It is not of my doing that NTA have not connected the two.

Submissions on one corridor relevant to others

You have not as yet made any decision on any of the corridors which form part of the scheme; all twelve have now been submitted. I have in my submissions made reference to points which are of general application across all 12 corridors. These include

a The grossly deficient consultation process. The star prize for this has to go to the apparent failure (or "shameful underhanded episode" as per their submission) to tell the residents of ParkView, Dublin 24 (your ref 316828-23) that they would be turned into an island surrounded by roads.

b Grossly inflated claims of time saving which I will deal with below

c elimination of roundabouts with no explanation

d elimination of important left turn slip- roads of no relevance to buses (the scheme is consistently described as "Core Bus Corridor Scheme")

e wholly inadequate modelling, which is confined to an undefined AM and PM peak and is on a silo corridor by corridor basis

f moving of bus stops without any notice, described in recent e mails as "enhanced" or "optimised" (see Bray corridor notification attached)

g widespread destruction of trees

h a mishmash of bus gates with a mishmash of operational times

i the wholly inadequate time scales for submissions

j the process where NTA are allowed a "second go" by submitting a response (with a generous timescale to do so and to have that response promulgated) and the inadequate and much shorter time given to reply to that response

I believe that insofar as I make those points on a submission related to one corridor, they need to be taken into account across all corridors, as these 12 applications are all the one project. I am therefore submitting that in assessing any of the corridors, you must take account of points made in this and in other submissions that are of general application. To do otherwise would force the public to have to repeat the same point over and over again.

This is the first time it has been possible to see all of the scheme by reference to the detail of 12 corridors and hence the first opportunity to look at this holistically. All of these plans should have been submitted so that one was not disadvantaged by being early in the process and not able to assess other bits of the same proposal.

Time savings over all schemes

The whole basis on which this scheme was sold was very substantial time savings across what started as 16 and reduced to 12 parts of the scheme. All of the claims were set out in scheme brochures all in the scheme website where time savings of more than half an hour were frequently claimed. In this case the November 2020 brochure Appendix K Supplementary Information at page 18 made a claim of 31 minutes. It is evident from the material annexed that none of these claims have materialised. My chart does not include Bray where the actual forecast is 5.9 and 5.8 minutes inbound and 7.3/7.5 minutes outbound. Across an array of corridors the only savings that exceed 10 minutes are Ringsend in and Tallaght out (in 2043). See Annex.

I am a frequent user of bus services. There are many problems with poor frequency of service (once every half hour does not cut it), buses on the app which simply don't turn up, buses being so crowded you cannot get on them. Buses taking 45 minutes rather than 40 minutes to get to town is not a problem for me or I suspect many of the customers. This problem is entirely a figment of the NTA's imagination. They claim some survey which they have not included in any document saying that this is a customer requirement; however the lack of its inclusion speaks volumes. I don't want NTA wasting billions of taxpayers' money to shave five minutes off a journey.

There is no effort whatever in thousands of pages of documents to give any indication of the time taken for buses on the spines to cross the city centre. It is quite illuminating in this regard to see that a time saving inbound is claimed on the Ringsend corridor of 12.5 minutes. This seems to be the most obvious example of a city centre segment and suggests that NTA would be much better trying to take measures within the canal and not traumatising people in the suburbs with ill considered plans.

It is my belief that the minimal time savings in the suburbs will be entirely negated by the time taken to navigate the city centre. Further it is evident from the City Centre route maps on busconnects.ie that some routes (most notably B and F) will have a much longer route in the city centre than now and this is before issues like the College Green Plaza are taken into account. Further the number of routes traversing the Luas tracks is very high; I can't imagine the Luas operator will be happy and Westland Row may become the new city centre for many.

It is my position that these minimal time savings apart from being a shocking waste of taxpayer's money do not justify very invasive measures in the outer suburbs which will be grossly inconvenient for residents and environmentally damaging. This seems to be the case with Santry area.

Issues related to Whitehall to Terenure Corridor

I took the 16 bus yesterday evening (9 August) and it left the airport at 10pm and arrived in Terenure village at 11pm. This is a journey which can be done by taxi in about 20 minutes, without the walk at destination. We are asked to put up with enormous inconvenience for a saving of as it happens a forecast 8.2 minutes northside and 8.2 minutes southside, but this is a forecast for the whole corridor from Swords to Rathfarnham. 1 hour is pretty well the shortest time and my experience of this route is more like 1.5 hours. The current 16 service is a shocking experience. It is always crowded from the airport, there are not enough to meet demand, luggage facilities are poor and it has to do the tour of Beaumont.

There is no priority given by NTA to getting people quickly from the airport as they insist on a world tour of Beaumont via Shantalla, Beaumont Road and Collins Avenue including two awkward right turns. This took about ten minutes to navigate at 10pm in the evening. This tour is not being replicated by any bus in the proposed new scheme. If they had got rid of this years ago, they could likely save most of the 16.4 minutes – and that would cost nothing!

There is a complete lack of clarity as to how the A services will navigate the city if City Council gets permission for the College Green Plaza. There is a very strong case for deferring any decision on this corridor until the Plaza application is considered. Alternative routes seem to be around St Stephen's Green or via Parliament St and the Quays.

Lack of consideration of obvious alternatives

I believe both the Aarhus Convention and proper planning process requires proper consideration of alternatives.

It seems pretty obvious to me that diverting the A2 and A4 at Coolock Lane and then using the motorway to Beaumont Church (and vice versa) is an obvious alternative. This would certainly speed up the service from both Swords and the Airport.

Further the voluminous planning application fails to ask whether Metrolink, already in your planning system, would take most of the traffic from Swords and the airport and therefore bringing into question the rationale for very speedy bus services from Swords, using the old Swords road alignment.

Further it is common at airports such as Edinburgh that the tram to the airport as a final destination is significantly more costly than a regular city journey. This metro will serve many stations beyond the Airport and likely its pricing will have to meet the requirements of the Swords commuter rather than ripping off the airport traveller. This is likely to have some knock on effect on the prices to the city charged by private operators. Further there are substantial jobs at Dublin airport, so it is a destination in itself for customers that expect to pay €2. I believe people use the Dublin Bus service from the airport because it costs €2, as opposed to the guts of a tenner for the private buses. If private bus has to be competitive with Dublin Bus and metro fares, this has implications for those using the A services. I think this proposal wholly fails to analyse what impact the cost for an airport (and Swords) journey by other means will have for services on the corridor.

Omit entire Santry section of scheme and augment with A5 service

I am suggesting that any works on a corridor between the junction of Coolock Lane and the flyover at Shantalla Road not be permitted and that A2/A4 proceed via Coolock Lane. The CPO deposit maps are very unsatisfactory as they don't have names of roads (and those there are in miniscule type) but sheets 19 to 21 are a mess of red ink affecting huge number of properties with people in numbers 281 to 299 for example losing half of their gardens. This is wholly disproportionate when you look at the alternatives. It is also environmentally very damaging.

No doubt NTA will say that would be terrible for Santry and buses. However they don't care much about them anyhow, as they are getting under BusConnects five x A2, five x A4 and four x 22 under BusConnects and a reduced service (14), whereas as of now they have six x 16, four x 33, four x 41

and four x41C (18) based on 7-8am terminal departures . So yet another downgrade of bus services on the A corridor, but punishing people with crazy road widening schemes dreamed up in some ivory tower.

Santry is rather similar to Chapelizod on lucanscheme.ie 314942. It is perfectly acceptable to put all the buses on the Chapelizod bypass and have only one bus route in Chapelizod village. However using what is in effect a Santry by pass is a no no.

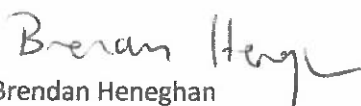
It is also the case that urban villages and things being within a fifteen minute access is very much part of the city development plan Chapter 7 ref 7.5.3. These schemes are destroying urban villages such as Santry (and indeed other villages on the A corridor) by making access awkward and by likely never ending construction phases. This seems to be contrary to the development plan.

I have already noted in a Templeogue Rathfarnham submission the major diminution of the A1 service to Ballycullen. An obvious and much cheaper solution would be to run a new A5 service from Ballycullen (thus bringing the service there to two thirds its current level) and run it through Santry to turn at the roundabout where under the Ballymun/Santry map the D4 bus is to turn. That would give people in Santry a five per hour service operating from a local terminus and also the 22 service. Those at the northern end of Santry could also access A2 and A4 at Coolock Lane and also the D4 service. Those at the southern end of Santry would be close to the A3 terminus.

Other

I note here that the "administrative discrepancy " in this case involved the omission of seven separate items (up from one in Blanchardstown). I remain of the view that this type of error renders the application entirely invalid, rather than allowing for an extended timescale. This was only promulgated on 6 July, 12 days before the original closing date. Many people may have made their submission in advance of summer holidays given the timing. I don't understand why the Bórd is taking the risk that something will be held as against it to be invalid, when a developer repeatedly makes this sort of error. I think the Bórd should reject this application on this ground alone.

I believe you should hold an oral hearing on this scheme, given the need to tease out all of the issues around Santry village. I would therefore request same.


Brendan Heneghan

88 Parkmore Drive

Terenure

D6W X657

Corridor		2028 mins	2043 mins	Page
Clongriffin	in	4.7	5.2	79
	out	4.1	3.2	83
Swords	in	8.2	7.8	131
	out	4.9	5.7	136
Ballymun	in	4.9	6.3	132
	out	4.8	5.5	137
Finglas	in	1.0	1.0	142
	out	0.6	0.2	147
Blanchardstown	in	5.7	5.5	115
	out	4.8	4.3	120
Lucan	in	7.1	7.1	79
	out	1.9	2.4	84
Liffey Valley	in	9.4	9.0	91
	out	3.0	3.0	96
Clondalkin	in	4.7	3.6	132
	out	2.1	1.6	136
Tallaght	in	7.0	2.4	140
	out	9.3	11.1	144
Templeogue	in	1.6	0.7	125
	out	1.6	0.8	131
Kimmage	in	7.4	5.4	79
	out	2.8	1.8	83
Rathfarnham	in	6.0	4.0	136
	out	8.2	4.6	142
Bray	Not available			
UCD	in	4.1	4.0	123
	out	4.3	4.8	123
Blackrock	in	6.6	5.2	116
	out	9.4	7.6	120
Ringsend	in	12.5		76
	out	4.5		80

Annex 2 Time savings

There is a statement in Traffic and Transport in each application to the effect that “Based on the results presented in Table A the Proposed Scheme will deliver average in/outbound journey time savings for B service bus passengers of up to X minutes in 2028 (AM/PM) and Y minutes in 2043 (AM/PM)”. We note that the Terenure to Spawell section of the bus corridor is forecast to only save **1.6 minutes** off an average bus journey either direction and this declines to **0.8 minutes (0.7 inbound)** after 2043. In the planning applications (effectively 15 in number) to date, the only worse performing corridor is Phibsboro to Finglas where savings are 1 minute or less – however this is already a full bus lane either way bar a short outbound section at the Cemetery.

These are the figures for each corridor (see Table above) set out in the Traffic and Transport section of the application and in number order.

"in" is the inbound journey in the morning peak

The corridors called Finglas, Clondalkin, Templeogue and UCD join other corridors and the measurement seems to relate to their segment only, although this is not clear with UCD



Brendan Heneghan

BusConnects Dublin Core Bus Corridor Status Update

1 message

BusConnects Core Bus Corridors <noreply@busconnects.ie>

Reply-To: noreply@busconnects.ie

To

Thu, Aug 10, 2023 at 9:05 AM

Dear Community Forum Member,

This is a no-reply email address. Please feel free to email queries to cbc@busconnects.ie

We are emailing you to provide a status update in relation to the Core Bus Corridors specifically the Bray to City Centre Core Bus Corridor Scheme.

This week, the National Transport Authority (NTA) gave notice of its application under Section 51(2) of the Roads Act 1993 (as amended) to An Bord Pleanála for approval in relation to a proposed road development consisting of the construction of the **Bray to City Centre Core Bus Corridor Scheme**.

For information, a small number of changes have been made to this scheme following consideration of the submissions received during the third round of public consultation (at the end of 2020) and these are summarised below.

- UCD Interchange design has been further developed;
- The design has been co-ordinated with the proposed Belfield / Blackrock to City Centre CBC at the Nutley Lane Junction;
- The design at the RTE junction has been further refined to tie-in to existing infrastructure within the RTE grounds;
- Two-way cycle track connection along the N11 Merrion Grove junction to the Coláiste Eoin School to provide a more direct connection to the northbound school going cyclists;
- The proposed coach stop at the Talbot Hotel has been moved further south to remove the impact to the Talbot Hotel forecourt;
- The service road between Old Cherrywood Road Junction and Loughlinstown Roundabout has been retained as two-way, following change to a one-way road under the Emerging Preferred Route Option;
- Rebuilding of the Woodbrook Side Lodge residential property at a new location east of its current location at the southern end of the Woodbrook estate has been included as part of the Proposed Scheme;
- The design has been further developed between Ravensdale Park and Dwyer Park to provide for continuous cycle lane and bus lane while minimising the impact to properties and the heritage wall on the east side at Belton Terrace;
- A number of junction, crossings and parking modifications along the corridor;
- **Layouts of all bus stops enhanced and** some bus stop locations / layouts have **been optimised** to allow better connectivity for bus passengers;
- Landscaping updated throughout; and
- Cycle facilities have been further optimised.

A copy of the application documentation may be viewed and downloaded free of charge at www.brayscheme.ie . Please note all previous documents regarding BusConnects are still available on www.busconnects.ie

Submissions/observations on this scheme may be made in writing to the Board at **An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902** between **Tuesday 15th August 2023 and Tuesday 10th October 2023.**

Any submissions/observations must be accompanied by a fee of €50 and must be received by the Board not later than **5.30 p.m. on the 10th October 2023**. This fee will not apply to certain prescribed bodies including those specified in Section 51(3)(b) of the Roads Act 1993 (as amended) or to landowners and others with a legal interest in land who are objecting to compulsory acquisition of land in which they have such an interest in a compulsory acquisition case.

Submissions/observations can also be made on the An Bord Pleanála website at the following address:
<https://www.pleanala.ie/en-ie/observations>