

CHAPELIZOD RESIDENTS ASSOCIATION (Estd. 1942)

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

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8/30/2022.

Chief Planning Officer,
Dublin Development Plan 2022 – 2028,
Dublin City Council,
Civic Offices,
Dublin 8.

Ref: DCC –C38 – Draft – 1511

A Chara,

I enclose some concluding remarks on “Chapelizod Local Area Plan 2022 – 2028”.

Beir beannacht,

J. Jerome Casey.

Secretary,
Chapelizod Residents Association

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As mentioned in our earlier submission, Chapelizod has history with Local Area Plans (LAP). The process by which the first, in 1992, was undertaken, was subsequently held up by DCC planning personnel as a template for such plans. But virtually none of its recommendations were implemented. The second, in 2001 had ten recommendations. Only two of them were implemented, and both were very successful. The walkways on Anna Livia Bridge have enormously increased the safety and comfort of pedestrians on the bridge. Improvements to the village centre have massively increased both coffee consumption and social conversation in Main Square¹. How the village might have benefited if the other 8 recommendations had been implemented!

For this LAP, Chapelizod Residents Association decided to take a narrow focus. CRA selected three projects whose presence or absence could hugely improve or disimprove life in the village. These were

- 1. BusConnects through the village v. Down the Bypass**
- 2. Sewage capacity and Development**
- 3. riverrun park**

For all three projects, CRA's strategy was to make a reasoned case to the responsible authorities. If our case was unreasonably rejected, we would apply to a superior authority, if necessary the EU.

The ESB is one of the country's oldest and most respected semi-states. However, in relation to environmental compliance at its Derrybrien wind farm, it attracted censure and/or fines from the European Commission, the European Court of Justice and An Bord Pleanala, before eventually being forced to decommission the plant earlier this year. The ESB's fall from grace over almost two decades will not have gone unnoticed by other Irish semi-states and regulatory authorities. If they are prudent, they will regard compliance with EU Directives as essential and not something to be merely considered. For their part, the EU authorities may become less constrained from becoming involved with an Irish community group such as CRA, if the EU-related proposals of such a group are unreasonably denied by the Irish authorities.

In this submission, CRA will outline what progress has been made, or may be made, in seeking to have the three projects implemented.

¹ A Ranelagh man was heard to exclaim "Why can't we have a good public social space in Ranelagh, like they have in Chapelizod?". This remark is justified when one compares Main Square in Chapelizod with the Triangle in Ranelagh.

1. BusConnects through the village v. Down the Bypass.

On 12/12/2019, CRA made a detailed submission to the National Transport Authority concerning the proposed BusConnects bus stop on the Bypass, above Chapelizod Hill Road. The standard acknowledgment promised that the NTA would contact CRA within 15 days. No such contact was made by the NTA.

In March 2022, CRA again contacted the NTA. On 8/04/2022 CRA made a submission to the NTA (v. Appendix 1: *Measuring Both Options + C/B Study*). A meeting between the NTA and CRA was arranged for 13/06/2022 (v. Appendix 2. *Critique of Meeting*).² In its presentation, CRA compared the two options viz. Improved Route through the Village v. Down the Bypass. Summarising, CRA found the Improved Route through the village to be shorter, faster, more accessible (attracting 100 – 120% of pre-Covid travelers as v. 50% for the Bypass option), cheaper (c. €0.3m for the Improved Route v. €30 – 50m. for a fully-accessible Bypass bus stop). Finally, unlike the Bypass Option, the Improved Route would not marginalise the village.

The second item, 2.2., on the meeting's agenda was to be a presentation by the NTA on their Bypass option. The NTA neither presented nor explained why they did not. 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. Finally the NTA refused to supply a copy of their Accessibility Audit of the Bypass bus stop, which they had earlier said had been completed. In the subsequent discussion, at no stage did the NTA contest the findings of CRA's Improved Route option. Only one of the four NTA attendees had visited Chapelizod beforehand: at the end of the meeting, when CRA twice invited NTA personnel to visit the village and thus gain some first-hand knowledge of what they were deciding upon, the invitations were twice refused. NTA minds were not for turning viz. *"NTA are comfortable that the Core Bus Corridor is in the right place"*. As Umberto Eco described the medieval Paris theologians, the NTA **"were very sure of their errors"**.

CRA was genuinely taken aback by this attitude. We believed that, under Covid19, public decision making had reached new heights of excellence. A band of health academics and professionals had thrashed out the science of what needed to be done at a particular time, presented it to the politicians, who then used their skills on how best to present it to, or occasionally inflict it on, the public. As the pandemic unfolded, both scientific and political skills improved. As a result, Ireland was among the countries with the lowest rate of excess deaths from Covid19. Traditionally, semi-states range from those of strong purpose who are mainly driven by the science in their area to set out first what the country needs and those whose starting point is what degree of change their political masters or general public will allow. We feel sure that those of strong purpose

² All names have been redacted, to protect the guilty!

have been further encouraged in their drive towards excellence by the success of the Covid19 team. However, as we left the meeting of 12/06/2022 the realisation dawned that the NTA was not among this group.

We had originally decided that, should the NTA refuse to examine our scientific findings and reject them, as they did, that we would refer the matter, not to the Dept. of Transport, to which the NTA formally reports, but to the Minister for Public Expenditure and Reform, which oversees the NTA's funding. However, some of our members asked that we make a direct request to the Chair of the NTA, since this was a strategic issue for the NTA. So on 2nd August, CRA sent a request with accompanying files to the NTA Chair asking him to decide between the two options and to give us his decision within 10 days.³ We received a reply from the NTA 27 days later, on 29th August. (v. Appendix 3). The NTA remained unconvinced since their "*proposals being advanced represent the optimal arrangements*". The letter then re-affirms the NTA's errors in relation to Accessibility and the Public Spending Code. The tone is one which we had asked the NTA not to repeat earlier – the Argument from Authority. We had advised that elderly Catholics had roundly rejected such arguments from the Vatican i.e. **Roma locuta est; Causa finite est**, and that it was not fitting to reject new scientific evidence in order to maintain an existing position which was ill-informed i.e. in error.

On accessibility, the letter admits that Chapelizod Hill Road is steep. Its 15⁰ 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

³ This was not unreasonable, as our submission of December 2019 had gone unanswered for 27 months.

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.

CRA will now proceed to brief Mr. Michael McGrath T.D., Minister for Public Expenditure and Reform, on these issues.

2. Sewage Capacity and Development:

In September 2021, Linders Garage (Chapelizod) held a pre-planning meeting (**ABP – 310800 – 21**) with An Bord Pleanala to consider the probable replacement of the garage with an apartment development of 131 units. Present at the meeting were representative from Linders, Irish Water (IW) and Dublin City Council (DCC) Planning. Page 11 of the Inspector’s Report in ABP – 310800 – 21 states,

“The submission from Irish Water (dated 11th August 2021) states that a Confirmation of Feasibility has been issued for a development of 131 units on the site”.

In a letter to IW, CRA CRA requested IW to withdraw this Confirmation of Feasibility and replace it with a refusal of Confirmation until such time as sewage capacity in Chapelizod had been both modernised and increased. As CRA is precluded by law from making representations to the planning decision-making body in this case – An Bord Pleanala (ABP) – and since the restoration of planning powers to the relevant Local Authority - Dublin City Council (DCC) – will come too late, we will be forced to take our case to the European Commission. CRA would suggest to the EU that, if this and other major developments were allowed in Chapelizod, Ireland would be in material breach of a number of EU Directives.⁴

CRA’s arguments to the EU Commission would include the following viz.

⁴ Principally, the Water Framework Directive.

1. IW publishes its list of Investment Plans and Projects.⁵ Given the recent rise in building costs, this is the maximum that can be achieved, without additional funding. In the Dublin city area, 19 Wastewater Projects Above/Below Ground are scheduled. In the justification for each project, 10 in total contain the phrase “to facilitate growth”, or similar. Chapelizod is not mentioned in IW’s list of projects, so on current plans, the village’s sewage will not have its capacity modernised and increased before 2024 at the earliest.

2. Chapelizod is one of Dublin’s oldest satellite villages. Its sewage system was installed in Victorian times and is now almost 150 years old. It is a “combined” system i.e a single pipe conveys both Wastewater and Stormwater. DCC notes that “during heavy rainfall, stormwater flows can be several multiples (50+ times) of wastewater flows”.⁶ To relieve pressure on the system, outflows of raw sewage are allowed into the River Liffey. In Chapelizod, there are currently up to 12 such outflows p.a. The continuance of these outflows is in breach of a number of EU Directives.

As a proxy for sewage demand we have taken population figures.⁷ Table 1 shows Chapelizod’s population from 1986 – 2016.⁸

Table 1. Population of Chapelizod 1986 – 2016

Year	Population
1,986	1,741
1,996	1,855
2,006	3,034
2,016	3,056
2026f.	4,340f.

In the 30 years from 1986 – 2006, Chapelizod’s population rose 1.8 times, from 1,741 to 3,056. Population growth was closely aligned with the growth in new housing units.

⁵ Irish Water Investment Plan (2020 to 2024) for CRU Determination pp. 121 - 125

⁶ [dublincity.ie/waste and wastewater/Grand Canal Storm Water Outfall Extension](http://dublincity.ie/waste-and-wastewater/Grand-Canal-Storm-Water-Outfall-Extension)

⁷ Population growth is likely to underestimate sewage demand e.g. the villagers no longer wash their dirty clothes in the river

⁸ Central Statistics Office, Census of Population 2016 and previous, volume 1, Population

Table 2. Chapelizod Housing Units under construction or planned

Apartment site	Possible units
Under Construction	
Falconers	170
Old Lucan Road	100
Springvale	71
Under planning	
Linders	131
Leitrim Lodge	70
14 – 17 Martin’s Row	100
Total	642⁹

There are 341 apartment units under construction and a further 301 are planned. At a (low) average occupancy of 2 persons per apartment, this would increase Chapelizod’s population by c. 1,284. The population in 2026 would then be 4,340, or 2.5 times the population in 1986: after allowing for a slightly faster growth in sewage throughput, this would mean a **threefold** increase in sewage demand in the 40 years to 2026. Trebling the pressure and throughput on a 150 year old sewage system with its 150 year old joints and 150 year old holding bolts will certainly accelerate the catastrophic failure of such an aged system.

The conclusion is inevitable. On grounds of public safety, no new developments can be permitted in Chapelizod until such time as new, high-capacity sewage and surface water systems have been installed. Until IW puts such a system in place, it must reverse its Confirmation of Feasibility for the Linders site and for other similar schemes.

On receipt of this submission, Irish Water reacted positively. Following discussions, Irish Water referred the matter to their Planning Dept. for research and analysis. A decision is expected shortly.

While maintaining close contact with IW, CRA needs to do further work on the following viz.

⁹ This 642 increase in units (and the resultant increase in population) is slightly ahead of the 576 - 626 units mentioned in our preliminary LAP, due to more up-to-date information.

- Making a submission to the Office of the Planning Regulator requesting that he place a moratorium on the development of major projects in Chapelizod until such time as the sewage and wastewater capacity in the village has been modernised and increased,
- CRA needs to engage with DCC Planning, particularly in relation to organising an Improved Route (for buses) through the Village. The principal item to be achieved by DCC Planning is the securing of room for a 3 bus indent (as a community gift or if necessary by CPO) in the current parking spaces in front of Linder's Garage.
- CRA needs to engage with DCC Sewers and Drainage Dept. to ascertain how many spillages from the village's combined sewer have occurred in recent years, and what have been the consequences for water quality.
- These sewage outflows into the river need to be cross-referenced against local rainfall levels. Luckily the Meteorological Office's Phoenix Park weather station is c. 1 km. distant from the village. In one of its major recent publications¹⁰ (p. 9), DCC notes

“Even small amounts of day to day rainfall (4 – 5mm. depth) can cause combined sewer overflows to discharge untreated foul sewage into receiving watercourses”

CRA will seek to establish from the local Met Office data what the frequency of daily rainfall flows has been at the 4 – 5mm. level (moderate) and at the 9 – 10 mm. level (substantial). Also, has there been an increase in the number of such rainfall events over time, as a result of climate change. If they have been increasing, this will probably convince the EU Commission that such outflows into the urban sections of the capital city's river is a material breach of the Water Framework Directive.

¹⁰ Sustainable Drainage Design and Evaluation Guide 2021. DCC

3. riverrun park:

CRA has done no work to hasten the re-birth of **riverrun park** from Liffey Valley Park since we first mentioned it in LAP Chapelizod 2022. But then, neither has DCC Parks Dept. Liffey Valley Park is the largest urban park under DCC management. It is also the park on which DCC has traditionally spent least money – both absolutely and relatively. When Parks Dept engages with CRA over riverrun park, if it shows no commitment to over-resourcing the park to compensate for its historic under-resourcing, CRA will insist to the authorities that management of the park be transferred to the Office of Public Works, which manages the adjacent Memorial park magnificently.

Appendix 1. *Measuring both Options + C/B Study*

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D20 HK40.

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

Re: BusConnects Bus Corridor 6 and Chapelizod

Dear Mr.NTA

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 2020¹¹ [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

¹¹ Local Government Audit Service (2021), Statutory Audit Report to the Members of Dublin City Council for the year ended 31 December 2020.

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 Chapelizod 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.¹²

“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.

¹² Building Regulations 2010. Technical Guidance Document M: *Access and Use*. Section 1.1.3.4. Ramped Access Routes, p. 23

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,

.....CRA
Chapelizod Residents Association.



8/4/2022

CHAPELIZOD RESIDENTS ASSOCIATION (Estd. 1942)

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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 Leydon, 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 section¹³.
- **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.

¹³ 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	1.8	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 materials¹⁴ 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.

¹⁴ 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.

Table 2. Inward journey times down the Bypass

Section	Kms.	Kph	Time Mins....Secs.
Start – Chap. Hill Road	1.1	55	1...12
Bus stop boarding	-	-	1.0 – 1.5 mins
Bus Stop – 1 st traffic lights	1.9	57	2...0
1 st traffic lights - SCR	1.0	40	1...30
Total	4.0		5...42 – 6.12

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 BusConnects 6 will have 7 routes, with up to 10 buses, attempting to find their allotted space on a very long, single bus stop.

Summarising, journey times down the Bypass may range from 5 mins. and 42 secs. to 6 mins. and 12 secs. This is longer than the 5 mins. – 5 mins. 30 secs. time for the improved route through the village.

.....CRA
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.¹⁵

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".

¹⁵ 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 CRA¹⁶ and accepted by the NRA. Three CRA officers would attend. Attendees for the NTA would comprise “....., *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,

¹⁶ Email fromCRA toNTA of 28th April 2022.

- 2.2. Presentation on NTA's preferred route down the Bypass
- 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.¹⁷ 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. 42 secs. – 6 mins. 12 secs.
- Due to its inaccessibility, patronage of the Bypass route would at best be 50% of its pre-Covid level. Chapelized 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 Chapelized now provide less than one-third of 2019 bus provision. With Chapelized 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 Chapelized 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**. Chapelized's population over the past 20 years has grown by almost 3% p.a.¹⁸, a faster growth rate than many of the outer suburbs to which buses previously serving Chapelized 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.**

¹⁷ Emails of 8/4/2022, 14/4/2022, 28/4/2022. Minutes of CRA/NTA meeting 13/6/2022

¹⁸ C.S.O. Census of Population 2016. Chapelized'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.¹⁹CRA 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.

..... CRA then asked if they had visited Chapelizod. Only one – Mr.....NTA... – 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,CRA had suggested toNTA 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.NTA 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.NTA 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.**
-NTA andNTA raised generalized arguments against bus indents.NTA 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 indent would have

¹⁹ Mr.....NTA.,MrNTA.,, Mr.....NTA.,, Mr.....NTA.,

demonstrated.²⁰ 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 juttred out to block traffic coming behind.NTA *“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..... NTA that the existing bus stop 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 bus stop in the village. The only location suitable for a bus indent is Linders garage.²¹ 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 Leydon 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.NTA blithely dismissed the element most important in securing an Improved Route through the village.

- Finally, at the end of the meeting, CRA 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 didNTA 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.NTA then proceeded to use the inferior option (Bypass route) as a template model for the superior option (Improved Route). Winging it,

²⁰ In fairness, Mr.NTA 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.

²¹ Paul Linders is seeking planning permission for 131 apartments.

he claimed “*they* (i.e. NTA) *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.NTA then “*reiteratedNTA’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.NTA and Mr.NTA both being **very sure of their errors.**

4. Preferred Route through the Village: Whither? CRA had warnedNTA 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.NTA 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 5.0 – 6.1. These were, and remain, extraordinarily high C/B returns.²² Paddy and John tested the exercise and agreed with the result. They brought it to the Dept. of Finance, who gave their assent. The Bypass was quickly built (1984 –

²² Like Eco’s William, options were presented to the policymakers. The B/C ratio of 5.0 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.

'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 rail 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.²³ 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 whenCRA raised such Accessibility questions withNTA 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,NTA refused top do so *“in advance of finalising all documentation”*²⁴ Which is it?

²³ 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.

²⁴ CRA have provided the NTA with c. 20 pages of documentation. The NTA has provided CRA with zero documentation.

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?

..... CRA.

Appendix 3. Reply from NTA

Secretary, Chapelizod Residents Association.

By email to: [REDACTED]

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,



Hugh Creegan,