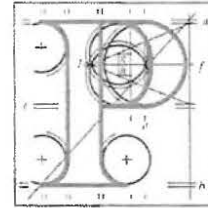


Our Case Number: ABP-317742-23



An
Bord
Pleanála

Maura Harmon
91 Patrician Villas
Stillorgan

Date: 02 July 2024

Re: BusConnects Bray to City Centre Core Bus Corridor Scheme
Bray to Dublin City Centre.

Dear Sir / Madam,

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

If you have any queries in relation to the 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,

DP 
Breda Ingle
Executive Officer
Direct Line: 01-8737291

CH08

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Dear Ms Reilly,

My name is Maura Harmon. Case reference number; **ABP-317742-23**. I live in 91 Patrician Villas, Stillorgan, Co. Dublin, A94 FW61. I have lived here most of my life, before that in Mount Merrion, and have first-hand experience of the slow destruction of what was once a great place to live.

Here are my comments and feelings on the NTA's Bray Bus Lane scheme submission;

1. It is unfair that a huge corporate body like the NTA with access and power behind it should be able to bamboozle people with no experience in planning, and building, who don't want their environment destroyed, which has caused a high level of distress, anxiety and depression to me (and possibly others), just because they can quote EU law about sustainability, reduction of carbon emissions, etc. Therefore, the body should come and explain itself and why it is bulling its way through small, very settled areas, even taking people's gardens, to get more buses on the road, as all developers, both private and public, have done to date to get what they want. It should also be prepared to answer questions.

This is a public body, essentially run by the government. Therefore it has a duty to help every citizen. We voted in this government. It therefore works for everyone. Who can say the next government won't decide against this scheme and stop it midway after findings show that it has become too expensive?

2. On finding out about this proposal, hearing from people living in other areas and as I try to make head or tail of the unwieldy document we can view, it appears to me that no one along this route wants or needs this infrastructure. As long as the buses are getting better, which they are, then it's not necessary to have such upheaval for so many.

In Patrician Villas' case, the bus lanes and stops are sufficient along this part of the N11, as is the cycle lane, so why does the NTA think they need to change it? EU policy is not a good enough reason for hurting people and forcing something that will destroy our environment for a long time to come if not forever. Yes, one must see the whole population, but, just like a teacher who sees the whole group of students but also the individual, the NTA needs to do the same and upgrade only where needed and where it does not impact people who live there.

3. As a cyclist I see only one thing - The cycle lane as it stands along our side of the N11 is fine. I am aware that people cycle on the road even when there's a cycle lane close by, or on the footpath. Ours is completely separated from the road as it is and this helps to stop cyclists from cycling on the roadway. No more people than already using it will use an updated one.

The cycle lanes that aren't fine are the ones that are being built now off the N11. The dual-lane cycle lanes make it difficult because people have to cross the road to use them rather than just cycling on the same side as the traffic. They don't do this, or go to the nearest pedestrian crossing to get to them. Cyclists who don't stick to the rules of the road always take chances. Those who do also use a footpath or cycle on the opposite side of the road to the cycle lane if they are, for example, in a hurry or the pedestrian crossing is a fair distance away. Other cycle lanes have safety bollards that are too close to corners many of which have been broken by

done to Stillorgan itself; our estate's main green space being built on, no swimming pool despite promises by the Council to renovate Glenalbyn, no places for leisure or for young people who don't play sports, high rise buildings everywhere, the shopping centre being let die - maybe for more flats, Stillorgan Village has gone except for one line of cottages down to The Orchard pub (this, I hear, is being sold for flats too, a thatched pub which should be preserved! But that's another story.). We have lost a lot already and we can't lose more.

7. Cutting down 50-year-old+ trees that screen us from carbon, dust, noise and light pollution, not to mention the highrise flats built on the Leisureplex site and other ones to be built across the road, and promising to replace them with 'mature' trees is a bad joke. Such trees will take years to grow, years that open us up to the N11 and the illnesses and dangers that come with living so close to such a road. The proposed 'mature' trees will also not form the full screen (other than over the underpass) that they do now. Trees convert carbon dioxide and water into oxygen through photosynthesis. The NTA can avoid touching these trees if they want to. They have had to do it elsewhere.

Pages 143 to 147 are specifically about the biodiversity we have. The submission states that *'55 trees of varying size and species are proposed to repair the woodland and replace the tree losses in the area.'* However, I can't find anywhere that states the size of the proposed trees. They need to be 50 years old if they are to replace the ones there already. The right trees for the right space were planted 50 years ago and should not be touched. The fact that there is a tangle of undergrowth instead of a sanitised version is not the issue. The issue is destroying the trees and habitats contained within them in the first place.

The NTA also acknowledges that it will take years for the trees to get back to where they are now! It proposes that the *'negative effects will be negated over the long-term...'* I'm sorry, but we could all be dead by then. The NTA hasn't taken into account any of the worries we sent in. They've answered them all carefully with the big words of such research needed to tell the people they want on their buses what we need. What we in fact need is for our trees to be saved - all of them. To me saving trees is preferable, less expensive, and ethically and environmentally sound, especially in an area that doesn't need to be put upon any more than it has been already and which also has a good infrastructure in place already; for our safety, our health and our wellbeing.

8. Along with our trees come habitats. The NTA must protect the wildlife in our area; foxes, endangered hedgehogs, birds and insects, wildflowers, and wild fruit, all cohabit in that line of trees. If the NTA fells our trees and bushes wildlife will be disturbed and wildlife will be killed due to human destruction of their homes. What is the NTA proposing to do about protecting them? Climate change is happening. The EU has also stressed that we have to protect wildlife and green spaces. That's in the EU policy too, not just public transport and 'Active Travel'.

I stress that trees are our lungs, none should go, and our wild animals must be protected. Will the NTA move all the trees that are here instead, along with careful relocation of dens or nests?

the bus in our small estate. It is in evidence already. Drive and park is an easy option especially if commuters from further away than Bray are taken account of. This is not an assumption as the cars are already there.

14. The entrance to Patrician Villas is already dangerously close to the main road junction, especially when turning left from the N11 so the left turn slipway helps a lot. It's getting harder to exit the estate too (either left or right) when the car or bike is needed. What has been done already and what the NTA is proposing to do adds to this.

15. In conjunction with this, not everybody uses the new crossway just to the left as you exit Patrician Villas. They still take the chance to cross anywhere, which applies to the dual carriageway too. Recently I noticed that the lights were out on that new crossway which makes it very difficult to see it at night. The new scheme won't stop this from happening. Is the crossway part of the scheme? Whether it is or not it affects drivers (including bus drivers), pedestrians and cyclists when it isn't working. This is dangerous.

Also, as at least one of our residents said in their submission, the crossway where it is causes tailback/back-up across the main road which adds another element of danger.

16. I believe you are leaving out a lot of people with this 'Active Travel'. For example, people who would have to take 2 or 3 buses to get to and from their destination daily, or older people who find driving easier than walking to a bus stop and waiting for 3 to come along at once (which I saw a few days ago and not by any means for the first time), people with mobility issues who have a car and, let's face it, people who just find it more comfortable and relaxing.

17. The people in the line of houses where the road runs beside the trees are going to be totally exposed to the N11. This includes children and older residents, so this is a health and safety matter.

18. One comment in the submission says *'It is an objective of the Council to ensure that all proposals for new roads, streets and residential layouts comply with the 'Design Manual for Urban Roads and Streets' (DMURS, 2013) which focuses on the needs of pedestrians, cyclists and public transport users.'*

I have already touched on this. It is good to be inclusive. We must be inclusive. That does not mean destructively so with no real argument for it as a good infrastructure is already there in the Patrician Villas case.

Yes, focus on getting it right, but not changing what doesn't need to be changed. What about focusing on the needs of people, other than those catching a bus, who live in houses right beside a main road?

19. The submission says that it wants to *'Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable;'* - the proposed new link will enhance the potential for cyclists from the Patrician Villas to access safe segregated cycling infrastructure on the N11 Road'.

reduction in Bus Patronage on the N11 Road in the vicinity of Patrician Villas relative to the other sections of the Proposed Scheme.'

2011 is a long time ago. Has anyone from NTA actually been out to see Stillorgan?

I don't understand why it's in the proposal either. Surely, if we're medium density then NTA doesn't need to destroy our trees. It's not because it's less easy to get to the current bus stop that we opt for cars. It is easy to get to the bus stop when you wish to.

There will be more people getting a bus anyway when the apartments are occupied. They too will find it as easy to get to the current bus stop.

24. *'In comparison, as shown in Figure 3.57 below, the Patrician Villas estate is enclosed by a continuous boundary between the properties in the estate and the N11 Road. This prevents any direct access/egress and acts as a **deterrent to achieving the required mode-shift away from private car use or residents in the estate.**'*

I find this to be an immoral comment. How dare they infer that because we have a lovely line of trees protecting us from the dual carriageway we are a deterrent to their proposal!

What does the line above in bold mean? It makes no sense! A move away from residents is ironically exactly what I think the NTA wants! No residents in our estate would suit fine! As you can see, I am getting angrier and angrier as I wade through the submission. I feel the NTA is looking at people as potential numbers of 'skulls' on buses (a nasty term I know bus drivers use) and not as real people, and I now no longer believe their intentions are honorable. Whether a typing mistake or not, or a badly phrased sentence, it is a Freudian Slip at the very least.

25. *'The significant improvement to the walking, cycling and bus facilities included within the Proposed Scheme will encourage sustainable modes of transport, therefore reducing the demand for private vehicles / parking along the Proposed Scheme. Improved accessibility is also expected to increase social cohesion within the local community as discussed further in Appendix A10.2 in Volume 4 of this EIAR (EY 2021).'*

This strikes me as moot. It cannot be proven that this will happen. People are known to drive some distances to park in free areas to get the bus to work.

What does the NTA mean by increasing 'social cohesion within the community'? We are already a cohesive community that cares for where we live as can be seen by the way the area is kept. People help each other all the time; bringing people places, shopping for people, visiting neighbours, neighbourhood watch, neighbourhood clean-up and so on. We have an active community centre too. Is the NTA suggesting that being able to get a bus more easily will bring us all together? Really?

26. Another comment that struck me was *'To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice'.*

Where are these recreational areas in Stillorgan? We used to have them. Such facilities would help to keep people in the area instead of shipping them off elsewhere to find a leisure centre with all the amenities we used to have. Jobs would be created too, and the shopping

Linked to the previous point is if everybody starts getting the bus, as the NTA suggests, the buses will be crowded with standing room only or no room at peak times. I believe this will happen. The NTA or TFI cannot ensure that they will supply as many buses as needed to make sure everybody has a seat and people don't have a long walk to face when they get off a bus.

Much more importantly, the NTA is proposing to give our children an easy way up to the dual carriageway. Children are inquisitive. At the moment our trees stop them. A path will entice them. Therefore it's a dangerous option that should be taken out of the equation completely.

28. *'It should be noted that vegetation is **not generally relied upon** for noise screening. From a noise point of view, due to the porous nature of vegetation, they provide a minimal level of noise screening. As outlined previously, the existing trees at this location will be retained where possible with replacement planting proposed to replace any losses to the woodland in front of Patrician Villas. With respect to mitigation for traffic noise during the Operational Phase, Chapter 9 states that: "The impact assessment has determined that there are no calculated long-term significant direct or indirect traffic noise impacts across the study area for the Proposed Scheme. The range of noise level changes and overall noise levels calculated do not require any specific noise mitigation measures to be incorporated into the Proposed Scheme".'*

That's easy to say and we are well aware our trees do not stop all noise from getting through altogether. Most houses here have double glazing too. There will always be some noise in suburban areas. But there again, nothing else can be '**generally relied upon**' to keep noise out either. The point is, with respect, that trees do keep out some noise. This is apparent with the changing seasons when the road noise is more audible in winter than in summer which is evidence enough for me.

29. However, the most critical argument against carrying out the destruction of the Patrician Villas tree line is that every point people have made needs which need to be taken together, not each one separately; we love our trees, their view line, their biodiversity, their size, their safety, their screening from pollutants and some noise, their ability to photosynthesise, the habitats they sustain, the privacy they afford our community, the safety they give us, the protection they give us, the ecological value of these trees, the age of the trees and every other reason we've submitted regarding why we don't want them touched.

2 fox cubs were playing in my front garden the other evening and drinking from my pond recently, and not for the first time.

I have fed a mother hedgehog and her two babies at my front door. This animal is seriously endangered.

There are nests in some trees that birds have come back to every year for years.

The treeline the NTA wants to fell (fully or partly, it makes no difference) is a place where these animals live and travel safely up and down their own wild roadway that the NTA has no right to destroy just to develop its one. There is already a working infrastructure here, one which doesn't need to be touched.

30. There are too many whats, likelys, ifs and maybes in this densely packed submission for it to be believed by anyone. I can't comment on every part of it, but there is an opposite response to

public service that is already becoming more reliable and worthwhile so there is no need to destroy our trees.

The NTA should continue to concentrate on those cycle lanes and roads off the N11, resurface the cycle lanes along the N11 if needed, work closely with Dublin Bus /TFI to make sure everyone can sit down at peak times, to have feeder buses ready to bring people to their destinations and/or to allow all types of bikes on the bus so that people can cycle on to work if they wish to. Improvement of the current bus stop near Patrician Villas is worthwhile. The middle of the main road could be slightly narrowed to make the bus lane wider along the Patrician Villas part. In other words, to me, this scheme suggests a spending of public money that is not inclusive and could be spent in other ways and areas and is therefore unreliable.

Finally, there is a conflict of interest regarding our area. The compulsory purchase order seems to give the council the compensation rather than the community affected by such an excessive, unnecessary upheaval and a council member sits on the board of the NTA.

To conclude, An Bord Pleanála must not pass this proposal as it does not take into account the full issue which is all our very real anxieties in Patrician Villas (and I'd argue, along the whole proposed route) and our many comments taken as one overall and very real objection.