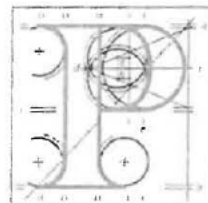


Our Case Number: ABP-317742-23



An
Bord
Pleanála

Tom Wade
2 Grove Lawn
Blackrock
A94 K6F5

Date: 24 July 2024

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

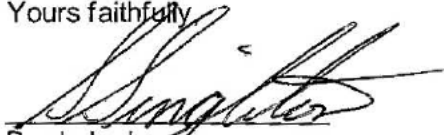
Dear Sir / Madam,

An Bord Pleanála has received your recent correspondence in relation to the above mentioned case. The Board will take into consideration the points made in your submission.

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


Breda Ingle
Executive Officer
Direct Line: 01-8737291

CH08

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Subject:

FW: Submission in respect to case ABP-317742-23

From: Tom Wade <[REDACTED]>

Sent: Tuesday, July 9, 2024 5:39 PM

To: LAPS <laps@pleanala.ie>

Subject: Submission in respect to case ABP-317742-23

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Case: ABP-317742-23

Submitted by: Tom Wade; 2, Grove Lawn; Blackrock; A94 K6F5.

Dear Sir/Madam,

Having read your responses to my and other submissions, I have to say that they in no way even attempt to address the concerns specified. I can only believe that the cynical reason for this second round of submissions is the hope that people won't bother to respond, thus reducing the number of objections.

I would state the following points still have to be answered:

- * There is no increased benefit to bus traffic, as there are already dedicated bus lanes on the N11.
- * Removing the traffic islands provided by the left slip lanes makes things worse for pedestrians. I regularly walk on the roads around Stillorgan and Mount Merrion. The removal of the traffic island on Foster Avenue where it meets the N11 has made it harder to cross this road. Whereas before, I could cross half the road while traffic on the far side of the island was moving (and completing the crossing when they had a red light), now I have to cross the entire road in one go. This increases the risk of being hit by a vehicle which could be coming from either direction. I fear that the same thing will happen when other islands are removed from other side roads.
- * The impact on car users are much more significant, and this is obviously the main intention of this scheme. The demented policy of deliberately increasing congestion on motorists in the hope that they will take to the bicycle depends for its success on a sustained high level of overall congestion. If the only reason that people are using public transport is that the alternative is deadlock, then any reduction in that congestion will result in a return to the car, and further subsequent delays. We should be trying to improve public transport rather than make the alternatives worse.
- * There is a very real danger we will become 'trapped' on either side of the N11, as attempting to cross it -- either by car or by public transport -- will result in being caught in huge delays caused by vehicles waiting to turn onto the N11, who no longer have a left slip lane, and must wait for a complete traffic cycle. Note that this will include bus routes like the L25, which need to cross the N11.
- * The proposal to provide an additional traffic light crossing for cyclists just north of the existing intersection at Stillorgan park is simply insane. It is almost directly above an existing underpass, which many cyclists and pedestrians (myself included) already use. Could the cycling lane not make use of that? I can no longer cycle like I used to, but when I did, I would find an underpass with cycle/pedestrian lanes far safer than a traffic light crossing.

* I have not managed to find a definitive answer to what is proposed regarding the existing left only slipway on Ulster Terrace onto the N11 (between St John of God and Stillorgan Park). If that were to be closed off, it would force everyone to join the increasing queues on the Stillorgan Park / N11 junction, which will be amplified by the removal of left slip lanes.

* The overall effect will be to increase the amount of traffic taking to smaller local roads to avoid being brought to a standstill on the N11,

* Your response tries to justify the removal of left slip lanes by stating they allow cars to exit from a fast road onto a slower road at speed. This could be easily addressed by putting raised levels on the left slips which would act like a speed bump preventing the cars from taking the turn too fast, and this would be a fraction of the cost of removing the islands completely. Similarly, the use of bollards limiting the points at which vehicles can cross bicycle lanes, such as increasingly used on existing left slip lanes, would improve the safety of cyclists, without the resultant chaos. It should be noted that under the proposed plans, vehicles will still be making left turns across the cycling lanes.

* The value of slip lanes should not be underestimated. Some years ago, during the construction of the M50, the south end of the motorway ended with a traffic light controlled roundabout on the N81 (Tallaght). At peak times the delay could be up to two hours (signs such as "1 hour to exit" and "2 hours to exit" were erected. Then somebody had the bright idea of a temporary left slip road taking traffic onto the eastbound N81, and the delays were reduced by over 50%. Similarly, when Dun Laoghaire Rathdown removed the left slip lane on Stillorgan Park onto Carysfort Avenue, the traffic backed up almost to the Stillorgan Road. The effect of multiple such closures on the N11 -- a road already under pressure -- will cause mayhem.

This whole scheme is masquerading as an improvement for public transport ('BusConnects') when it actually offers very little improvement to users of public transport, a marginal improvement for cyclists (which could be achieved with far less collateral damage), an actual negative effect on pedestrians trying to cross junctions, and a huge cause of congestion for the majority of other road users. The traffic congestion in the afternoons is now as bad as it used to be during 'rush hour', thanks to such 'improvements' to our roads.

I urge you to reject the unnecessary and catastrophic closing off of the left slip lanes.

Regards

--

Tom Wade


Subject: FW: REFERENCE: ABP-317742-23

From: Pauline Fogarty [REDACTED]
Sent: Wednesday, July 10, 2024 9:25 AM
To: LAPS <laps@pleanala.ie>
Subject: REFERENCE: ABP-317742-23

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Pauline Fogarty
65 Patrician Villas,
Stillorgan
Co. Dublin

To Whom it may concern

I do not believe the NTA have considered all the concerns of the residents of Patrician Villas, especially in relation to the danger the potential danger of the proposed changes. As a community we are very concerned about such massive disruptions to our neighbourhood and request An Bord Pleanala force the NTA to work with the existing infrastructure and come up with alternative less damaging and less potentially dangerous plans. Below are the major concerns of the residents of Patrician Villas.

DANGER

- Pedestrian access from the green space in front of the underpass on to a busy dual carriageway could prove dangerous for children, dogs, foxes etc. who could potentially run directly out onto the N11.
- Bicycles and scooters entering Patrician Villas via the ramp down from the N11 and from the underpass at the same time could prove hazardous.
- Having pedestrians, bicycles and scooters sharing the same concrete ramp could also prove unsafe, especially in wet or icy conditions.
- The extension of the underpass with a footpath above overlooking our green space could encourage anti-social behaviour (A pedestrian overpass crossing once existed in this area but was removed because of stone throwing).

LOSS OF TREES

Along with providing natural beauty, trees clean the air, absorb dust and wind, muffle noise, prevent flooding and absorb carbon emissions. The proposal to remove roughly 50% of mature trees (Fig 1.) the length of Patrician Villas and Grove is the most worrying change. These trees were originally planted 40/50 years ago to act as a screen between our neighbourhood and a busy dual carriageway and to act as noise muffler and safety protection barrier.

- According to the Environmental Protection Agency (EPA), as a result of climate change, Ireland should expect an increase in the intensity of storms and a substantial increase in the frequency of heavy precipitation events. Rain is hitting the ground at higher speeds and taking much longer to drain away, leading to an increased risk of flooding. However tree leaves, branches and trunks intercept rain before it hits the ground and root systems help water penetrate into the ground 80% faster than concrete, thereby preventing / reducing flooding. Trees provide shelter from wind (EPA predicts storms will happen more often) and trees provide shade and cooling (EPA predicts temperatures will continue to increase).
- The removal of trees will see a reduction in biodiversity which according to the W.H.O “provides numerous ecosystem services that are crucial to human well-being at present and in the future”.
- While the NTA say they will plant some new trees and shrubs to offset the loss in ‘some’ areas, it will likely take many years before the replacement trees can restore some of what was lost...if at all.
- Trees eat the greenhouse gases that cause climate change - their removal is contrary to protecting Patrician Villas & Patrician Grove from future harsh climate events.

LOSS OF AIR QUALITY

- An additional set of traffic lights (at the proposed Toucan crossing) located less than 100 meters before the main traffic lights will interrupt the flow of traffic on the N11. Vehicles burn more fuel when travelling below 45 km/hr and especially while breaking and revving. The Toucan crossing lights so close to the main crossroads lights will cause additional slowing down and stop-starts of all vehicles and in doing so emit more carbon. While it is projected that all busses will eventually be low carbon emitters (hybrids), the same cannot be said for all the non-bus vehicles such as cars, trucks, vans and motorbikes, whose number greatly surpass that of buses.
- Higher exposure to air pollutants directly increases susceptibility to poor health.

LOSS OF SOUND BARRIER

- The additional vehicle stop-starts at the Toucan crossing and at the crossroads will mean an increase traffic noise. Trees and walls are ‘sound absorbers’ so the removal of part of the wall on to the N11 for pedestrian access, in addition to the removal of many mature trees the length of Patrician Villas and Patrician Grove will inevitably increase noise pollution in our neighbourhood.

LOSS OF LAND & GREEN SPACE

- The proposed concrete ramp and staircase in front of the underpass will eradicate the open recreational space where children play and people rest.
- The proposed footpath along the N11 will require approx. 2 m ‘land-take’ the length of Patrician Villas
- The proposed extension of the underpass further into Patrician Villas will reduce the remaining available green space.

LOSS OF EXCLUSIVITY & PRIVACY

- The loss of trees will be most drastic along the border between the underpass and Patrician Grove where tree mass is less dense. The consequence may mean some homes having a 'less concealed' view of a busy dual carriageway and less privacy from passing onlookers.
- The relocated bus stop will re-direct bus users travelling southbound into Patrician Villas to get to the bus stop. The ensuing increase of foot traffic through Patrician Villas will result in a significant reduction in privacy and exclusivity in our community.
- The area in front of the underpass may feel and look like a shared public space for everyone from surrounding localities. Patrician Villas will potentially be more frequently used as:
 - a short-cut to surrounding streets;
 - a 'set-down' area for collecting/dropping people close to bus stops;
 - a free-parking area for 'park & ride' commuters;
 - an overflow carpark for residents of the new apartments opposite;
 - and • a quicker route to Stillorgan Park Road for southbound travelling bicycles, scooters and pedestrians who will no longer have to go as far as the crossroads lights.

LOSS IN VIEWS

- Studies have shown that views of green nature reduce stress and antisocial behaviour and promotes a positive sense of mental health and wellbeing. The loss of much Patrician Villa's leafy forest-like tree border will be lost and replaced by a more expansive view of the busy N11 dual carriageway and a more obvious, un-masked view of the 9-story apartment blocks opposite.
- The increase of foot traffic through Patrician Villas and extension of the underpass would likely see an increase in graffiti and litter.

Another change outside Patrician Villas is the closure of the left-turn slip roads on to and off the N11 to allow for uninterrupted bicycle lanes. While this will cause more traffic congestion and carbon emissions on all adjoining roads (such as Stillorgan Park Road), it will also happen at many major crossroads the length of the dual carriageway. For this reason, slip road closures may not be a point of contention at this time.

In conclusion, it must be repeated that as a community, the residents of Patrician Villas are not against road infrastructure improvements, and we do not want to impede more efficient and safer public transport measures. We do however question the relocation of the Stillorgan Park bus stop which will lead to many knock-on changes of real concern and, to quote Councillors, has "no rationale". We would like the NTA to leave our neighbourhood, trees and green spaces as is and come up with an alternative proposal that would be less harmful, less impactful and less dangerous.

Regards,

Pauline Fogart