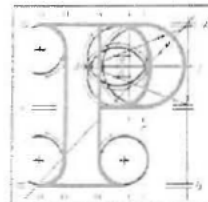


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Professor Patrick Davey
Ashdown
Dublin Road
Shankill
Dublin 18
D18 ET86

Date: 24 July 2024

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

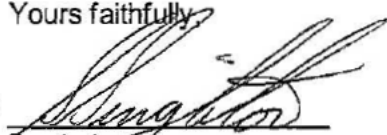
Dear Sir / Madam,

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 Ingile
Executive Officer
Direct Line: 01-8737291

CH08

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Ríomhphost

Tel (01) 858 8100
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Website www.pleanala.ie
Email bord@pleanala.ie

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

Sinead Singleton

Subject: FW: BusConnect13 ABP-317742-23
Attachments: BordPlaneala reply.docx

From: [REDACTED]
Sent: Friday, July 12, 2024 12:30 PM
To: LAPS <laps@pleanala.ie>
Subject: BusConnect13 ABP-317742-23

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Sir,
I attach my response to the submission dated 24th May 2024 received from the National Transport Authority.

Signed:
Professor Patrick Davey
Ashdown
Dublin Road
Shankill
Dublin 18
D18 ET86

Professor Patrick J Davey
Ashdown
Dublin Road
Shankill
Dublin 8.

Reference:ABP-317742-23.

In reference to your letter dated 17th June 2024 requesting observations on the reply of the NTA to submissions made in connection with the above reference.

I wish to make clear that I am totally in favour of developing a comprehensive traffic management system, not only for Dublin but the entire Country. The details of the system will not be to everyone's liking but where substantial and constructive comments have been made by local populations who are familiar with the local dynamics, then, in order to prevent unnecessary mistakes, waste of resources, community disruption and environmental damage it is incumbent on the planners to listen and respond in a meaningful and respectful manner. This has not been done in the section of the reply that relates to Shankill. Several groups collected and collated various data sets which give constructive and detailed views of different aspects of the traffic flows, but none of this information was used or even discussed in the NTA response.

My name is Professor Patrick Davey [No. 164] and the NTA submission states that all issues raised in my original submission are answered.

The NTA summary of my observations and their reply is on page 888. The summary totally ignores my fundamental point that the data underlying the Bus Connect13 are seriously flawed and therefore call into question the entire basis for the NTA plan. The individual reply to my comments is generic referring to section 3.9 but the issues I raised are not answered except in a very general way and by reference to earlier studies, projections and overall planning guidelines. The specifics are not addressed, particularly the demonstrated unreliability of the data underlying the proposals.

At no time does the NTA reply refer to the very extensive 'on the ground' observations and data compiled by various groups from Shankill, of the way traffic actually flows, both bus and other vehicles, particularly through junction 38 and the observed minimal delays which occur at present. Nor do they refer to the measured passenger numbers and where they board and where they alight, indicating a majority of through passengers from Bray. These issues are directly related and relevant to the design of the system.

The proposal to close entry to Corbawn Lane for east going traffic and route that traffic down Shanganagh Road to turn right, down Beechfield road, beggars belief. This proposal was tried a number of years ago and was found to cause traffic chaos. Dun Laoghaire-Rathdown County Council has been making exactly the same point for the last two years. In section 3.9 this issue is addressed but very superficially clearly reusing data used in previous iterations and not using the recent data sent in response to the request by An Bord Pleanála or referencing in any way our previous experience with this idea.

A range of issues are addressed in pages 196 – 205 relating to the roundabouts 37,38 and 39 and the general response to traffic flows through these junctions.

References are made at many points to projections and how these show, consistently, that the original proposals are the best option. However, at no point are the specific observations sent by groups in Shankill to NTA addressed in the NTA response.

In my original submission I looked in detail at the traffic numbers presented on the diagrams for the junction designs [37 -39] and it is clear that the numbers do not cohere. Also the traffic numbers and flows collected and presented by other groups have not been considered, in every case the NTA has returned to their own projections, even when it is clear that these are based on unreliable information. It was mentioned during the public meeting held in Woodbrook College that it was a well known fact that the data collection on the Southern part of the BusConnect13 scheme was very poorly carried out and seriously inaccurate, but the NTA has refused to address this issue. The issue of closing the Westbound traffic on the Corbawn Lane entry to junction 38 is brushed aside and minimal reference to the consistent objection of DLRCoCo, based on past experience, nor to the detailed traffic flows which show that the road section between junctions 38 and 39 is a serious bottleneck. For short periods [30- 90 seconds during rush hours] this short section of road causes backups onto the Dublin and Bray Roads, this situation will be made significantly worse by the current proposal to close Corbawn Lane to east going traffic and compounded by the signalling system proposed for junction 38 which will unquestionably cause longer delays than at present.

Any suggestion that the current proposals for the junctions 37 -39 would be viable are hopelessly undermined by the admitted fact that the NTA has never engaged in any meaningful way with the Shankill Community, no site walk and talk meeting, no on-the-ground observations of the dynamics of traffic flows etc. As I mentioned in my earlier observations it is the flow through the system that is relevant, not the actual numbers.

Given that the figures presented within the detailed designs for Junctions 37 – 39 are clearly unable to form the basis for any meaningful modelling and thereby suggesting, very strongly, that none of the other projections for BusConnect13 are reliable; given also that the NTA response makes no reference to the figures compiled by the Shankill community it is clear that An Bord Pleanála must reverse its decision to refuse an oral hearing. Only with an oral hearing will it be possible to ensure that the NTA understands and addresses the specific realities of traffic flows in and through Shankill. Anyone who uses the buses will tell you that delays in the service almost entirely occur south of the Wilford roundabout and not in Shankill.

Sinead Singleton

Subject:

FW:

From: pjdriv <[REDACTED]>
Sent: Monday, July 15, 2024 5:00 PM
To: LAPS <laps@pleanala.ie>
Subject:

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Professor Patrick J Davey
Ashdown
Dublin Road
Shankill
Dublin 9

Reference:ABP-317742-23.

I wish to re-emphasise that since a bus lane is now proposed for N11/M11, The entire plan which recognises serious damage to Shankill needs to be re-thought.

The NTA has signally failed to engage with the concerns of Shankill.

Patrick Davey