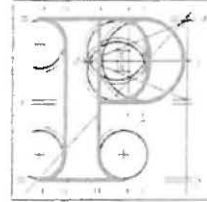


Our Case Number: ABP-317742-23



An
Bord
Pleanála

Dara Byrne
XPM Limited
Mulberry House
Shanganagh Vale
Cabinteely
D18 A440

Date: 24 July 2024

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

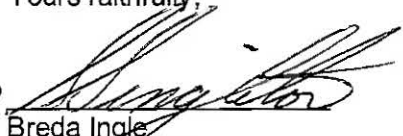
Dear Sir / Madam,

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

Teil	Tel	(01) 858 8100
Glao 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

Sinead Singleton

Subject: FW: Bus Connects - NTA Submission Response - Case Ref: 317742
Attachments: Bus Connects N11 Corridor - Letter of Objection 120724.pdf

-----Original Message-----

From: Dara Byrne dara.byrne@xpm.ie
Sent: Sunday, July 14, 2024 6:33 PM
To: LAPS <laps@pleanala.ie>
Subject: Bus Connects - NTA Submission Response - Case Ref: 317742

Caution: This is an External Email and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir / Madam,

Please see attached my submission for Case No 317742 for your attention as per your letter received on 17th June regarding the case.

Please confirm receipt of this email.

Kind Regards,

Dara Byrne
Managing Director

XPM Limited
Mulberry House
Shanganagh Vale
Cabinteely
Dublin 18
D18 A440



Check us out on LinkedIn: [linkedin.com/company/x-project-management-xpm](https://www.linkedin.com/company/x-project-management-xpm)



XPM Limited
Mulberry House
Shanganagh Vale
Cabinteely
D18 A440
Ireland

An Bord Pleanála
Strategic Infrastructure Division
64 Marlborough Street
Dublin 1
D01 V902

Date: 12/07/2024

Re: Bus Connects – Bray to City Centre N11 - Permanent Acquisition of Land – Site Location Maps 1125(1).1e, 1125(2).2e & 1125(3).2e

Dear Sir / Madam

Following receipt of your letter dated 17th June 2024 regarding the above and the recent submission (May 2024) by The National Transport Authority (NTA), I am writing to you re the above proposed road development application from Bus Connects Case Ref 317742. I have read the submission by the NTA and once again strongly object to the proposal to create an opening in our boundary wall directly onto N11.

The NTA submission deals in very broad and general terms to what is a very specific issue which effects circa 250 residents in the Shanganagh Vale estate. The NTA use data for the Cabinteely area to try make points regarding car use versus use of public transport. Whilst I'm in full support of the Bus Connects project and increasing public transport and accessibility to it for everyone across the city and county, aligning the requirements of the population of Cabinteely and the 64% car usage rate among that population with a single 250-person estate is not comparing like for like on a fair and equitable basis.

Again, the NTA have failed to address specific issues raised by myself and multiple other residents in previous correspondence on a single specific issue whilst using broad and general data and analysis of the wider Cabinteely area in preparing their submission. Similarly, the requirements of a 250-person group in a single estate should not be used to determine the requirements of the Bus Connects project in the wider Cabinteely area.

Their statement that the boundary wall acts as a deterrent is completely unsupported as they never investigated this as part of their initial assessments or indeed before preparing their recent submission. The estate has immediate access to bus stops serving both north and south bound routes adjacent the Circle K and opposite beside the newly built estate in Beech Park. I know this as these are the stops I, my family, friends and many neighbours use. The NTA don't as they didn't ask.

XPM Limited
Registered office: Mulberry House, Shanganagh Vale, Cabinteely, Dublin, D18 A440
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Registered Number: 711775
Directors: Dara Byrne (Managing), Ruth Kennedy Byrne (Company Secretary)

Similarly, the NTA has no idea if Shanganagh Vale is a permeable estate as they have no studies or data to arrive at their conclusion that the approach they are proposing will have any further meaningful benefit beyond the existing permeability. I would suggest using similar general analysis to that used in the NTA submission that this would not be the case. Those using private vehicles from the estate are unlikely to change to using bus services because the walk to the bus stop is reduced by 3-4 minutes of walking and based on a total population of the estate the net gain in overall usage of the bus service would be marginal at best. I do however note existing users will have 3-4 minutes less exercise twice a day.

The location proposed to create the pedestrian entrance into Shanganagh Vale from a bus stop outside the wall of the estate on the N11 has numerous issues which the NTA have failed to specifically address as they have not looked at the specifics of the issue at hand.

Immediate Safety & Proposed Location:

I would again note that the NTA have failed to address the issue around their proposed location of the entrance. The proposed entrance is located immediately on a 90-degree bend in the main estate road. This is effectively a blind corner and in many instances the speed limit is broken by visitors, delivery drivers and others around this bend.

Effectively the NTA are proposing a crossing on a 90-degree blind corner in a private estate. I ask where else would this be proposed and allowed? They then advocate for residents (families, children, students and the elderly) to use this. Is not using the existing stops near the existing estate entrance not safer?

The location and unsecured nature of the proposed entrance causes safety issues in relation to its immediate proximity from the estate to the busy N11 for young children who play in the estate. Again, with the current single entry / exit to the estate there are much fewer safety issues.

Crime & Anti-Social Behaviour:

This was apparently the most common theme and issue in the letters of objection received. The NTA submission section 3.7.3.2 is supposed to address this but does nothing whatsoever to address the concerns I and others raised. Again, the generality of the NTA submission combined with applying general analysis and wide-ranging policies fails completely to address the specific issue raised.

For example, the NTA submission references Volume 2, Chapter 10 of the EIAR which notes the impact of the amenity (in this case the proposed entrance) as a negative, non-significant, short-term during the first year. Again, no consideration has been made for the historic, factual and well recorded impact of the previous "amenity" that was the original entrance.

The factual analysis and records for the amenity already exist and this was explained to the NTA in multiple letters yet they have chosen to ignore this. The record states that the previous entrance was in general terms a disaster which adversely affected the residents of Shanganagh Vale and subjected them to crimes such as arson, theft, assault and anti-social behaviour.

These are the only facts and records which count and ought to have been addressed. The NTA's broad and general policy documents do not even come close to the actual issues which existed with the same entrance before and in fact are a poor and dismissive response.

I would question the detail and sincerity of the NTA submission in relation to the specific issue of the pedestrian entrance in Shanganagh Vale as they have taken the concerns and issues which existed previously with the same entrance and discarded them. They have tried to address the factual negative issues that the previous entrance had on the estate and address them with general analysis and policy documents relating to permeability and accessibility. This is a flawed approach by the NTA.

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I believe that the NTA have responded at best poorly to the concerns raised and tried to disguise their lack of understanding and detailed review of the matter with generalities and broad analysis of the wider Cabinteely area applied to a very specific issue.

I have no doubt that creating the new entrance in the same location as it was 20 years ago will eventually lead to the creation of the same issues if not others in addition. The NTA have failed to comprehend this and failed in their response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Dara Byrne', with a long horizontal flourish extending to the right.

Dara Byrne
Managing Director
X Project Management Limited