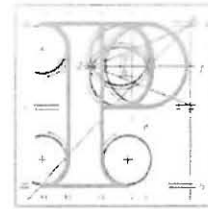


Our Case Number: ABP-317742-23



An
Bord
Pleanála

Carol Scott
4 Seaview Park
Shankill
Dublin 18

Date: 25 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.

Please note the Board's decision to determine the application without an oral hearing is not open for further consideration.

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 Ingole
Executive Officer
Direct Line: 01-8737291

CH08

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Sinead Singleton

Subject: FW: BUS CONNECTS BRAY TO CITY CENTRE - ABP-317742-23
Attachments: BUS CONNECTS RESPONSE TO AN BORD PLEANALA RE NTA COMMENTS JUNE 2024.docx

From: Carol Scott [REDACTED]
Sent: Monday, July 15, 2024 3:03 PM
To: LAPS <laps@pleanala.ie>
Subject: BUS CONNECTS BRAY TO CITY CENTRE - ABP-317742-23

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 or Madam,

My name is Carol Scott and I live in 4 Seaview Park, Shankill, Dublin 18.

I am attaching my response to the NTA Submission made to An Bord Pleanala in June 2024 in relation to the Bray to City Centre Bus Connects Corridor. This follows my previous submission made in October 2023. All of the points made in this earlier submission remain valid. They have not been answered by the NTA.

I remain deeply opposed to the Corridor, so far as it relates to Shankill. The NTA has provided a suggested justification for the overall Corridor but this does not actually cover the unique situation in Shankill.

I would sincerely ask that An Bord Pleanala listens to my arguments, as outlined in my submission of October 2023, and in this further submission now. I would ask you to read these and all other submissions sent by Shankill residents, in October and now, in their entirety. The volume of objections from so many people is a testament to their deep distress and can only be fully appreciated by being read in full. Do not depend on the selective and sanitised versions provided by the NTA.

Yours sincerely,

Carol Scott

BUS CONNECTS – BRAY TO CITY CENTRE – REF. NO. ABP-317742-23
RESPONSE FROM CAROL SCOTT, 4 SEAVIEW PARK SHANKILL, DUBLIN 18
TO AN BORD PLEANALA RE NTA SUBMISSION JUNE 2024

Shankill

The NTA's response to the submissions made by Shankill residents is totally inadequate. Yet again, they provide copious amounts of material, much of which is a reiteration of what has gone before, much of which is repeated numerous times within the document itself and much of which is looking at the generalities of the Proposed Scheme rather than the detail of what it would mean for Shankill. Nothing that they have said has changed the situation. All that Shankill residents have said in their previous submission to An Bord Pleanala in October 2023 remains valid. The NTA have given superficial responses to a few specific points in each submission but have ignored other more challenging points. They have given a brief collective overview of Shankill, but they have not addressed the core issues.

These are that:-

- There is no proof that the Scheme would make any appreciable difference to travel times through Shankill nor that it would improve our current excellent bus service.
- There is no justification for the level of environmental destruction proposed.
- There is no justification for the hugely negative impact that it would have on the Shankill community.
- They have refused to consider the clear alternative of using the proposed M11 bus corridor to bring passengers from Bray to Loughlinstown.

Need for the Proposed Scheme

On page 239 the NTA outline the need for the Proposed Scheme. All of their points may be valid for the overall scheme but, as we have consistently stated, they are totally unrealistic in Shankill where the unique nature of the village makes implementation of the full template impossible. It really does seem to be a case of persisting in trying to make the Scheme fit when it is clearly not feasible to do so.

Addressing each of the NTA points:-

'Currently bus lanes are available for 69% of the Proposed Scheme'.

In Shankill bus lanes would only be provided for short distances at a time under the Proposed Scheme. Sometimes there would be two bus lanes, sometimes there would be a bus lane on one side of the road only, and for a large section of the route through the core village there would be none. This erratic scheme makes no sense.

'Cyclists must typically share space on bus lanes or general traffic lanes with only 47% of the route of the Proposed Scheme providing segregated cycle tracks'.

Facilities for cyclists in Shankill would worsen under Bus Connects. Existing advisory cycle tracks would be removed and cyclists **would** be forced to share Bus Lanes or general traffic lanes for much of the route.

'Bus lanes are being shared with both formal and informal parking facilities and cyclists'.

There is **no** parking on the route through Shankill, other than the core main street area.

Under Bus Connects, cyclists **would be** forced to share Bus Lanes with buses where they do not currently do so.

'Private car dependence has resulted in significant congestion in the Greater Dublin Area that has impacted on quality of life, the urban environment, and road safety'.

Yes, there are too many cars, and too many unnecessarily large ones that should have been restricted at source years ago, but in Shankill, Bus Connects **would** create designated car lanes north and south of the village, thereby encouraging more drivers to use the route as a rat run. Bus Connects would itself impact on quality of life, the urban environment and road safety in Shankill.

The NTA says that 'Sustainable transport infrastructure assists in creating more sustainable communities and healthier places to live and work while also stimulating our economic development and contributes to enhanced health and well-being when delivered effectively.'

Shankill already has a Dart line and two stations. A Luas extension from Cherrywood to Bray is planned. We currently have a very efficient bus service and facilities for cyclists are better than what is proposed. Under Bus Connects, our community would become less sustainable, less healthy and there would be diminished well-being due to the imposition of dual carriageways and removal of vast amounts of trees and green spaces. All the submissions An Bord Pleanála has received from Shankill residents make it patently clear that Shankill is **now** a vibrant, healthy and beautiful village. This is something to be cherished, not destroyed.

Submissions from Shankill Residents

I have been impressed by the depth of knowledge and the passion that has been shown by so many people from Shankill in their submissions to An Bord Pleanála. Unifying virtually all of the submissions has been an overwhelming rejection of the NTA Bus Connects plans as they relate to Section 3, the Loughlinstown Roundabout to Wilford Roundabout section. People are deeply invested in their community and are shocked by the proposed destruction of Shankill. They are not motivated by personal gain or benefit but by their desire to protect a very special place that is stunningly beautiful, rich in nature and an inspiring place in which to live. Our words contrast with those of the NTA who seem to lack this vision and sense of place but see only a road. They appear to put more emphasis on bringing people through Shankill at peak times, many of whom have no specific need to do so, rather than considering the needs of those who actually live in Shankill.

Shankill village is not just a short row of shops running from the Credit Union to Quinn's Road, it is a cohesive community which extends along the entirety of the route from Loughlinstown Roundabout to Bray.

I have put a lot of thought in to my submission, as has everybody else who took the time and effort to respond. To do us justice, please read these in their entirety. Do not rely on the summaries provided by the NTA which are sanitised and incomplete.

In my previous submission to An Bord Pleanála, I have documented the high level of submissions made in relation to Shankill compared with the entirety of the remainder of the route. This is again the case now. This suggests that Shankill continues to be an area of major contention and local people are very unhappy.

The NTA says that 95 submissions were made in relation to Shankill but in fact a further 16 of the Dispersed Locations and Submissions in Relation to the Whole Proposed Route also focussed on Shankill. This means that 111 out of the total 206 submissions received actually were in relation to just one 3km section of an 18.5km route. In other words, over 50%. This is a clear message that the NTA have got it badly wrong.

The unproven benefit of Bus Connects in Shankill, the level of destruction, the disproportionate costs involved and the deeply negative impact on the community and the environment in this one section of the route have been contentious from the beginning. It is therefore baffling to understand why the NTA has not listened and has persisted in pursuing a deeply flawed plan.

Even those most likely seen by the NTA as major players, such as the developers of Woodbrook, seem to have concerns about some of the impacts of the plans. They question the removal of the stately trees at the entrance to their estate and the loss of the sylvan aspect of the Dublin Road in general. They also outline difficulties experienced with changing plans given that their development has made efforts to comply with planning permission. They also highlight the difficulties that would be caused by the NTA's proposal to close off all access on a temporary basis to some of the properties that have already been sold.

The DLR submission was in favour of the overall scheme and talked about its policy of embracing inclusivity, healthy place-making and putting a modal shift to active travel at the heart of its policy. Unsurprisingly the NTA have utilised this quote repeatedly in their document. I would again counter that this may apply on the remainder of the route, but it definitely does not do so in Shankill. Rather than 'place-making' it is place and community destroying. DLR is a public entity. It is not an elected body. If it does think that Bus Connects would work in Shankill, it is worrying that it is so far removed from the people that it is designed to serve.

The following are my additional specific comments arising from the NTA's submission to An Bord Pleanála.

Inadequate Environmental Impact Assessment

The DLR County Council submission includes the report of its Biodiversity Officer. She states that despite her request for a meeting with the ecologists employed by the NTA, no contact has been made with her. Nor has the NTA requested any of the detailed ecological reports which she possesses. The Council now confirms that it has a wide selection of ecological data which it can provide to the NTA 'if required'. The fact that the NTA did not seek this information and the Council did not insist that the information be incorporated into decision-making suggests that there could even have been an intention to distort the findings of the EIA which is shocking given the hugely destructive nature of the proposals as they relate to Shankill and its natural environment.

The Biodiversity Officer has questioned the procedures used in compiling the EIA. She has requested that revised assessments in consultation with her should be carried out. This clearly undermines the credibility of the NTA environmental assessment.

The excellent submission by Michael Greene shows the significant level of biodiversity in Shankill and suggests that the EIA produced was largely a desk top exercise and deeply flawed. In particular, Michael highlights the danger posed to bats in Shankill. These are widely threatened and are awarded the highest level of legal protection. He also refers to the range of rare birds, and mammals, which are found in Shankill.

DLR Tree Policy Not Included in NTA Submission

The NTA states that the new DLR Tree Policy was not taken into account when compiling its response as it had not yet been published. This policy – Tree Strategy – A Climate for Trees – Tree Strategy 2023-2030 was due to be published in October 2023 and extracts from it are included in the DLR submission. It stresses the importance of retaining the existing tree canopy 'the importance of trees which have taken the best part of a century or more to mature and have a very high value in terms of their contribution to climate mitigation, biodiversity, local heritage and landscape character. Now the DLR website says that 'Trees and Urban Forestry Strategy 2022 – 2031' will be published shortly. What is going on? An Bord Pleanála should not make a decision in the absence of this information. I believe that to do so would be contrary to Irish and European environmental legislation.

The DLR Biodiversity Education Programme spells out the importance of trees (as does the South Dublin Tree policy). DLR itself states that it has become increasingly more difficult to establish newly planted trees and those that do grow will take 60 to 80 years to replicate those that are due to be felled in Shankill. In my opinion, what is proposed in Shankill under Bus Connects is nothing less than eco-side.

European Nature Restoration Law

Since the Bus Connects Plans were drawn up, the European Nature Restoration Law has been passed. This means that Ireland is required by law to restore 30% of specific habitats by 2030, 60% by 2040 and 90% by 2050. It legally binds EU States to restore at least 20% of the EU's land and sea areas by 2030 and all ecosystems in need of restoration by 2050. Regarding forestation, member states are tasked with increasing the amount of tree cover in urban spaces and planting at least 3 billion trees by 2030. A logical step would therefore be to stop the current destruction of nature supporting areas such as Shankill in the first place. There needs to be a core change in policy to allow this. I believe that An Bord Pleanála and other state bodies should, as a matter of urgency, adapt their policies accordingly. For instance, although not in the EU, the U.K already has laws in place which stipulate that any development must retain existing natural features and make sure that the site is left in a better environmental condition than when work started.

Special Areas of Conservation

The coast and seas off the east coast from Rockabill to Dalkey Island and as far as Ballybrack, are part of a SAC, as is Bray Head. I have repeatedly said that nature does not stop between the two areas. The land and seas between Dalkey and Bray should also be protected. The NTA disputes that SAC protection has any impact on the Bus Connects route. I ask that An Bord Pleanála fully investigates this.

Shankill's Trees, Hedges, Green Spaces

The NTA has consistently said that new planting would compensate for the loss of trees in Shankill. This is patently not true. Many of the trees are very large landmark trees, 150 years old or more. Many others are at least 50 years old. Taking a very conservative estimate of 450 large trees to be felled, and saying that they are 50 years old, represents the loss of over **22,000 years** of collective growth. This does not take account of the very likely ancillary loss of adjoining trees which will be impacted by disturbance to their root systems. Nor does it take account of all the trees that do not match the NTA size requirements for recording. Therefore the actual figures are likely to be much higher. This is totally unacceptable. The NTA's documentation is unclear, making it difficult to establish exactly what trees they are talking about, nor does their reference to the loss of tree groupings give any real information.

The NTA says on page 364 that the effects resulting from the loss of trees removed would remain. It goes on to say that replacement trees would be provided 'where feasible' or 'wherever practicable'. In very many cases it would not be feasible or practicable. The loss would be permanent. The NTA confirms that the sensitivity is very high and the magnitude of change would be very high. It is disingenuous for the NTA to say that replacement trees would compensate.

The Climate and Biodiversity Crisis is right now and time has nearly run out to save future life on our planet. We cannot afford to lose the carbon absorbing and life-giving properties of so many trees and hedges.

Green verges leading into estates and general open space would also be lost along the length of the route. In St. Anne's Church, the NTA say that no parking would be lost as a result of land-take. They neglect to say that green space within the church grounds would instead be used for parking. This has been turned into meadow in recent years, in line with church greening policy.

The short stretch of cycle track between Stonebridge Road and Corbawn Lane, which is part of the cause of the loss of land at St. Anne's Church and along the Dublin Road to Rathmichael School, was added as an afterthought to link Corbawn with the schools in Stonebridge Road, but these schools are no longer in the catchment area for Corbawn, so the need no longer applies. A short stretch of isolated cycle track would achieve nothing but would involve significant land take. This has been highlighted by Rathmichael School and residents on the Dublin Road, who again appear to be unhappy about their level of engagement with the NTA. Saying that the scheme provides a more direct route for cyclists from Loughlinstown Roundabout to St. Anne's is rubbish.

Impact on Hierarchy of use of Public Space

Pedestrians

Conditions for pedestrians in Shankill would not improve as a result of Bus Connects. The visual landscape of Shankill would be negatively impacted on a permanent basis by the loss of very many trees and hedges and the removal of landmark roundabouts. People would no longer walk along a two-lane village road but beside a motorway. There would be more traffic and it would be less safe.

Some additional crossings would be put in place but most of these are not currently required, they are being added purely as a result of the road widening that would occur.

The negative impact of Bus Connects in Shankill is contrary to the **DLR Living Streets initiative** in Dun Laoghaire which aims to improve life for pedestrians. Why should Shankill be treated in a totally different way? It is also contrary to the stated aim of the Minister for the Environment who advocated the bypassing of towns and villages and the enhancement of community life. Shankill WAS bypassed decades ago. The NTA want to un-bypass it.

Buses

The narrow bottleneck of Shankill core village would remain under the Proposed Scheme. It is debatable as to whether signalisation would deliver bus priority when it has never been used over an extended distance of 1.3km. The nature of a village is the movement of people and this is not always predictable.

In May 2024 DLR County Council approved a 30kph speed limit in all residential areas throughout the county. This means that much of the route of the proposed bus corridor through Shankill would be restricted to 30kph, the remainder would be 50kph. No such restrictions would apply on the better alternative, the M11 Bus Corridor.

The removal of roundabouts at St. Anne's and Quinn's Road would mean that circular trips are no longer possible and there is a likelihood that buses would be delayed by cars making u-turns in the core village area.

The NTA says that they predict journey time savings of 5.8 minutes in 2043 on inward journeys from Bray to the City Centre and 7.5 minutes on outward journeys. Is this really quantifiable? If so, is it really going to inspire increased bus use? The problem with buses is that people make them unpredictable. There is a difference between a bus that stops at every bus stop and a bus that stops intermittently. There is a difference between a bus that picks up one person and a bus that picks up twenty people at a bus stop. There are more variations when somebody is disabled or when wheelchairs and prams are involved. Only trains, metro or Luas can guarantee journey times.

Negative Impact on the Public Realm

The NTA says that the operational phase of the Scheme would alter the existing townscape character of Shankill. They say that the magnitude of change in the baseline environment would be very high. On Page 263 they say that the potential townscape/streetscape and visual impact will be negative, significant and long-term. Does this sound like 'improving the public realm'?

Consultation Process

I have been in consultation with the NTA for 5 years both in person at meetings at their headquarters, at public information sessions, on-line and through submissions made. My understanding of the word consultation is that it involves listening and a constructive exchange of ideas and views. This is not what I have experienced. The whole process has been deeply stressful and frustrating and I have lived under the shadow of the destruction of the village that I love. I would describe it as trying to talk to a juggernaut. From the moment a decision was made about the route through Shankill, all effort from the NTA was directed to reinforcing their decision and dismissing any alternative suggestions. They stood over out of date traffic information and they used out of date maps. Following the first consultation process, I expected the NTA to respond to numerous suggestions that Route 2A which followed the path of the M11 was a better option but it was not even referenced. All submissions were summarised on one slide and then dismissed as having been taken into account. This was not the case. When I challenged the lack of a genuine review of the proposal, I was met by silence. This is not good enough.

In their document the NTA refer to changes that have been made as a result of consultation with local people. I would challenge this. Changes that have been made, such as no longer running four lanes of traffic through the core village, have largely been as a result of their own realisation that the idea was preposterous. To reduce the level of impact of tree and hedge cutting in Shankill they have effectively adopted the approach of destroying one side of the route through Shankill at a time. In other words, all the trees, shrubs and so on are felled on the right hand side and then the trees on the left are felled. The NTA present this as being a positive because they are not destroying the land and trees on both sides.

The summary in the NTA document of my most recent submission includes a line about support for Bus Connects. May I state clearly now that **I do not support Bus Connects in Shankill**. I believe it to be deeply negative and destructive, effectively destroying a vibrant community and offering little if any improvement to travel options. Having also read other submissions I believe that the inclusion of a line in a number of them about supporting Bus Connects is not an accurate reflection of their intent either. The NTA's repetition of their thanks under each mention is disingenuous.

Shankill already borders the M50 motorway, the M11 motorway, the Dart, the proposed Luas line and now the NTA wants to add a further motorway through the village itself. It is totally excessive in a narrow strip of land between the mountains and the sea.

Seaview Estate

The NTA has not addressed the concerns of Seaview residents.

They say that they responded to residents by reducing the level of impact of the Proposed Scheme by choosing only to widen one side of the R837 rather than both sides of the road. I do not believe that this was as a result of the protestations of residents. I believe it was more the result of their amended policy of limiting the damage throughout the village by destroying one side at a time.

They **do not** acknowledge the double impact of having a bus corridor on **both** the M11 and R837.

They **do not** acknowledge the visual impact of losing much of the woodland barrier between the estate and the M11.

They deny that the loss of this woodland would make any difference to sound levels. Their own material directly contradicts this. Again, I quote from the NTA itself in the following extracts from the Original Background Research carried out by the NTA when considering proposed routes through Shankill:-

'ALL ROUTES ARE A PROBLEM AT LOUGHLINSTON ROUNDABOUT. THE REMOVAL OF NOISE AND VISUAL TREE BANKS WOULD RESULT IN EIGHT LANES OF TRAFFIC. TWO METRE SOLID WALLS ARE PROPOSED.'

Should both the M11 and the Shankill Bus Corridors go ahead this would actually become 10 lanes of traffic. It is totally unacceptable. Some houses in Seaview directly adjoin the R837.

Likewise, the NTA do not address the impact on wildlife of removing the woodland. Recently I have seen foxes and even a badger heading towards it. A higher wall would cut off their access to whatever woodland is left.

Again the NTA solution is to plant a few native trees at the front of the woods. The children in Seaview will have grown up and left home by the time the trees have grown enough to make any impact. Older residents will be long dead!

As regards access and egress from the estate by car, the NTA say that those exiting Seaview would still be able to turn right despite the road being four lanes rather than two and that they would be aided by a pedestrian light further down the road. I have my doubts.

M11 Bus Corridor

It is unacceptable that the NTA should summarily dismiss the idea of utilising the proposed M11 bus corridor. Simply saying that this is a different scheme and not relevant, is not good enough. Their own original route options included a very similar option. Diverting some buses from Bray at Wilford to the M11 would provide rapid and guaranteed journey times for commuters from Bray to Loughlinstown. It makes far more sense than being restricted to a 30kph route through the narrow bottleneck of Shankill. This really would incentivise people to abandon their cars, particularly if they were heading to Cherrywood and perhaps onward by Luas. Alternate buses could cater for those who do actually wish to go through Shankill and some minor amendments could be made to ease traffic flow if required. Since the beginning, we have said to the NTA that only buses that need to travel through Shankill should do so. The NTA's response was effectively to say that it was a case of accept the corridor or have no buses in Shankill.

In their submissions, the people who know Shankill best have made very many useful suggestions. I sincerely urge An Bord Pleanala to listen to them and reject the NTA plans.

Timescale for An Bord Pleanala Review

I am concerned that An Bord Pleanala has asked us to respond to the extensive NTA documentation in just a few weeks when submissions were received from us in October 2023.

I am also concerned that the published deadline for a decision by An Bord Pleanala has not been extended beyond 31st July. This does not allow time to review the material that we are providing and to act upon it.

Given the serious questions about the Proposed Scheme as it relates to Shankill, I would also again ask that An Bord Pleanala holds an Oral Hearing into the case.

As I have previously said, it is also vitally important that An Bord Pleanala should read all our submissions in their entirety. There is a great deal of valuable information there. You cannot rely on the summaries given by the NTA. Please do not rubber stamp a deeply flawed proposal that would result in the death of our wonderful village.

Yours sincerely,

Carol Scott