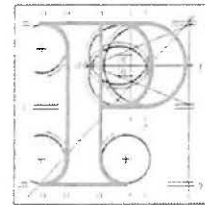


Our Case Number: ABP-317742-23



An
Bord
Pleanála

Cora Plant & D'OMuirthile
25 Seaview Park
Shankill

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
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Sinead Singleton

Subject: FW: Bray to City Centre Core Bus Corridor (Bus Connects) Scheme Ref 317742 - Response to Applicant's submission 14th July 2024.pdf
Attachments: Bray to City Centre Core Bus Corridor (Bus Connects) Scheme Ref 317742 - Response to Applicant's submission 14th July 2024.pdf

From: David Hurley <[REDACTED]>
Sent: Monday, July 15, 2024 9:51 AM
To: LAPS <laps@pleanala.ie>
Subject: Bray to City Centre Core Bus Corridor (Bus Connects) Scheme Ref 317742 - Response to Applicant's submission 14th July 2024.pdf

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.

Please find attached response to applicants submission for scheme ref 317742.

Please confirm receipt by reply.

Sincerely,
C Plant & D O'Muirthile

Bray to City Centre Core Bus Corridor (Bus Connects) Scheme

Bord Pleanála Case reference: HA27.317742

Cora Plant & D O'Muirthile
25 Seaview Park Shankill Co. Dublin
14th July 2024

Following receipt of the additional submission lodged by the applicant for the above, we hereby reassert our objection to the above scheme, in particular the section of the proposed scheme between Loughlinstown and Wilford roundabouts, on the basis that:

- Insufficient time has been provided for interested parties to consider the lengthy submission by the applicant.
- Failure of the applicant to address the concerns raised and to satisfactorily demonstrate that the scheme benefits outweigh the significant environmental impacts along the section noted.

The bases of our objections outlined in our original submission, dated 9th October remain in full, with summary of justification for refusal provided further hereunder.

Applicant submission and response process.

The applicant has had from October 2023 to May 2024 (c. 7 months) to compile a lengthy response to the large volume of submissions and objections made to the scheme. Objectors and interested parties however have been granted only 4 weeks to consider and digest the hugely voluminous (907 page!), complex, and disjointed document – and this paltry time is during the month of June/July when many are on holidays and perhaps out of the country.

Notwithstanding this An Bord Pleanála (ABP) have allowed themselves a mere 2 weeks to then fully consider all further submissions made in response to the applicant before adjudicating on the application (a self-imposed deadline it is worth noting)! These questionable timelines and deadlines, and the resultant impact on the reliability of the overall process, are highly concerning and questionable and appear very much weighted in favour of the applicant. What is the role of ABP in this process if the applicant has been given all this time to respond to submissions raised and in essence “self adjudicate” to determine the justification for the proposed scheme?

Failure of the Applicant to address concerns raised.

On the face of the voluminous submission made by the applicant, it would appear that they have responded to all issues raised, however their approach to “grouping” numerous submissions by theme or geography, though complicated referencing and sub-referencing within the lengthy document, has meant that they have simply either avoided or skirted around specific issues raised and have failed to address specific concerns. Some of these are detailed below, however in reality it is not possible for objectors and interested to fully identify and consider all the issues given the lack of reasonable time as noted previously.

The development of the proposed scheme, and subsequent further submission from the applicant, has not sufficiently considered alternatives and future planned upgrades. With particular reference to the route option along the N11/M11 (the N11/M11 (Bus Corridor) Interim Scheme, the longer term N11/M11 Junction 4 to Junction 14 Upgrade Scheme and future LUAS extension, the application contends that these schemes have different objectives, and that (Pg 281 of applicant’s submission) the N11/M11 BPIS “*does not provide bus stops between the Loughlinstown and Wilford roundabouts*”. Whilst it may be the case *to a point that the scheme objectives don’t fully align*, the fact remains that the N11/M11 BPIS could provide bus stops (and segregated cycle infrastructure) at relatively little cost and therefore align with the proposed scheme objectives. The proposed scheme has therefore failed to consider the significant cost savings and environmental benefits of combining some or parts of these schemes to align objectives and to deliver associated multiple benefits. This is of particular note given the relative “closeness” of the offline route option to the emerging proposed route in the original route assessment process, along with its comparative significantly reduced environmental impacts.

The justification for lack of provision of suitable and safe cycle infrastructure along the proposed route, particularly from Loughlinstown Roundabout through Shankill village, has not been satisfactorily addressed in the applicant’s submission. Indeed the applicant cites the lack of segregated cycle facilities as a justification for not selecting a particular route (pg 511, the application notes “sharing of bus lanes” by cyclists as a reason for not selecting a route as it “*would not meet the proposed scheme objectives and impact the safety of cyclists*”). Similarly, the applicant has proposed a reduced speed limit of 30km/h through Shankill village as a suitable mitigation for shared lanes, yet contradicts itself by contending that cyclists (presumably of all ages including young children) will be safe sharing a lane with buses and taxis at 50km/h on the Dublin Road.

Indeed the downgrading of the Dublin Road to a Secondary Cycle Route in the latest edition (2022) of the Greater Dublin Areas Cycle Network Plan (notably also produced by the applicant) seems a very convenient change considering the inability of the proposed

scheme to adequately cater for cyclists along this stretch, and despite this link continuing to remain as the primary route for commuter cyclists.

The applicant asserts that a Stage F Road Safety Audit (RSA) has been undertaken and included as an appendix to the EIAR. It is important to note that a Stage F Road Safety Audit has not been carried out, rather a Stage 1 Road Safety Audit. As per TII published regulations a Stage F Road Safety Audit “*is carried out before the route is chosen. RSA at this stage will identify safety features associated with each route option*”. This important step in the route selection process has not been undertaken by the applicant, and only a Stage 1 RSA has been completed. A Stage 1 RSA is carried out on preliminary design, after the route has been selected.

It is highly concerning that the applicant does not appear to understand the difference in road safety audit stages. This undermines the design and decision-making process, and calls into question any safety related reasoning and justifications for the proposed route put forward by the applicant.

The applicant contends that it has fully engaged with the public in developing the proposed scheme in accordance with the Aarhus convention, however the applicant is confusing *communication with active participation and engagement* in the process. There overwhelming opposition to the route through Shankill that has been demonstrated throughout the entire public consultation process. The applicant however has never considered the views of the public in the route selection process but has simply sought to “tweak” the preferred route which has been resented as a fait accompli.

The applicant’s response has failed to adequately address the concerns arising from the lack of dedicated bus infrastructure along this section of the proposed route and the resultant impacts on journey time savings. Dedicated bus infrastructure is very different to and provides a much higher degree of certainty of journey time savings and journey time reliability than the much less dependable bus priority infrastructure (priority signals etc.). Objections to the scheme have called for clarity on the actual journey time savings and increase in journey time reliability provided along the Loughlingstown to Wilford section, however the applicant has failed to demonstrate this, instead combining (hiding?) the likely negligible positive impacts within their reporting of the overall route benefits. Indeed, the EIAR states that, the proposed route results in only modest savings in journey times between Bray north and Loughlinstown. The assessment acknowledges that the vast majority of time savings are actually realised along the N11/Stillorgan/City Centre sections of the route.

The applicant's response fails to address the fact that the modelled bus journey time savings and improvements in journey time reliability along this section of the route are overstated or have not been adequately considered as the modelling has not taken into consideration local traffic movements (loading/unloading, right-turning into/out of multiple local roads including Lower Road, Aubrey, Stonebridge Close, car park to Tesco Express/business centre, Brady car park, on street parking and loading/unloading etc. etc.) within Shankill village and the hugely significant impacts of same on bus journey times and reliability.

The applicant notes in Section 3.9.3.4 of their submission that the upgrades to the Dublin Road/Quinns Road/Cherrington Road roundabouts including signal control priority measures, provides bus priority and ensures bus journey time through the Shankill "bottleneck". The traffic assessment however has only considered the priority to buses provided at these particular junctions, and has in no way considered the impacts of local traffic movements on buses through the village as noted above. The applicant therefore has failed to properly assess and determine whether the Shankill "bottleneck" will remain post construction, thereby undermining any and all bus journey time benefits and reliability for the entire scheme.

The applicant's submission has failed to address the issue that the environmental assessment has understated the negative environmental impacts due to the practice of "grouping" trees to be removed without identifying and assessing the number and condition of individual trees to be removed along with associated quantification of negative impacts on potential habitat, climate, and landscape and visual amenity. That is, the assessment has "down-played" the actual numbers of trees to be removed by reporting large areas to be removed as singular "groups". Put simply, despite the additional 907-page response, **the applicant cannot still provide detail on the actual numbers of trees being removed and the resultant environmental impact of same.**

The applicant's response has failed to address the fact that Route Option 2B cannot possibly still be considered the preferred route (notwithstanding that it was always less preferable from an environmental perspective) on the basis that:

- It was originally considered to have the lowest capital cost, however this assessment failed to consider the potential cost benefits of combining (or partly combining) with the N11/M11 Bus Priority and proposed LUAS schemes as outlined previously, and also failed to consider the associated economic impacts during the construction phase in comparison to any less impactful offline routes.

- It was originally considered to provide a high-level of service for bus passengers, however this was on the basis of much more dedicated bus infrastructure, much of which has now either been removed or replaced with less dependable bus priority signals.
- It was originally considered to provide continuous dedicated cycle facilities, which quite clearly it no longer does, instead forces cyclists to share lanes with vehicles.
- It was originally considered equal with alternate routes from a safety perspective, whereas this can no longer be the case given the removal of cycle infrastructure (and notwithstanding the failure to undertake a proper Stage F safety audit at route selection stage).

It is clear that the original comparison are no longer valid, and given the acknowledged significant long term impacts, can no longer be justified without proper re-assessment.

On pg.289, in response to concerns raised by a number of objectors, the applicant notes that *"the proposed scheme does not propose to remove any bus services and is focused on infrastructure design. The Dublin Network Redesign is a separate project currently under consideration by the NTA"*. It is worth noting that the NTA manage both the core bus corridor and network redesign schemes, yet cannot determine what the impacts of the network redesign scheme will be on bus services? If it is the case that the left hand doesn't know what the right hand is doing, then all modelling presented to justify the scheme is highly questionable.

Conclusion

The applicant has failed to address the concerns raised and has failed to demonstrate that the section of the scheme between Loughlinstown and Wilford roundabouts has been adequately assessed and have failed to justify the significant and permanent negative environment and social impacts.

The basis of our objection to the scheme, in particular to our objection to the section between Loughlinstown and Wilford roundabouts, remain as outlined in our original submission dated 9th October.

The current scheme as proposed and as presented by the NTA should be refused permission.