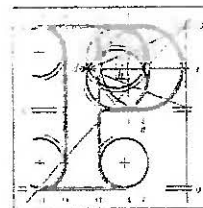


Our Case Number: ABP-317742-23



An
Bord
Pleanála

Denis & Trish Hosford
17 Eaton Wood Avenue
Shankill
D18 VW84

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 Ingle
Executive Officer
Direct Line: 01-8737291

CH08

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Sinead Singleton

Subject: FW: BRAY SCHEME Ref. No ABP-317742-23 - Bray to City Centre Bus Corridor
Attachments: Bus Connect - Impact on Shankill Village - Denis Hosford_240715.pdf

From: Denis Hosford <[REDACTED]>
Sent: Monday, July 15, 2024 4:12 PM
To: LAPS <laps@pleanala.ie>
Subject: BRAY SCHEME Ref. No ABP-317742-23 - Bray to City Centre Bus Corridor

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.

To:

Aisling Reilly
Executive Officer
An Bord Pleanála

Please find enclosed our further observations regarding the National Transport Authority's Application for a new Bray to City Centre Bus Corridor. Our concerns relate to its impact on Shankill Village.

Kind regards

Denis and Trish Hosford

17 Eaton Wood Avenue
Shankill
Dublin 18
D18 VW84

17 Eaton Wood Avenue
Shankill
Dublin 18
D18 VW84

15th July 2024

An Bord Pleanála
64 Marlborough Street
Dublin 1

**Re: BRAY SCHEME Ref. No ABP-317742-23
(Bray to City Centre Bus Corridor) - Impact on Village of Shankill**

Dear Sir / Madam,

I refer to your letter of 17th June 2024 inviting us to make further observations on the 907 page response received from the National Transport Authority (NTA) to objections / observations made against the proposed Bus Connect Corridor between Bray and Dublin City Centre. It would seem that a lot of individual points raised by people in their observations last October simply have not been addressed in the NTA's report.

Our primary concern relates to two junctions in Shankill at St Anne's Church and the right hand turn at Beechfield Manor, as well as the points mentioned in our original letter of 10th October 2023. The NTA sole response in respect of these junctions seems to be on page 235, which says:

*"The existing St Anne's Roundabout (Dublin Road/ Shanganagh Road/ Corbawn Lane) is proposed to be upgraded to a signalised junction with new pedestrian crossing facilities, cycling infrastructure and SCP for buses. Corbawn Lane is to be an exit only junction on to Shanganagh Road.
A dedicated right-turn lane is proposed from Shanganagh Road on to Beechfield Manor. A dedicated left turn lane from Shanganagh Road into Beechfield Manor is also to be provided.
The two-way cycle track from Stonebridge Road will run through Dublin Road and connect to the Dublin Road/ Shanganagh Road/ Corbawn Lane). A two-way cycle track is proposed at the Corbawn Lane"*

We would respond as follows:

1. The NTA say there will be an improvement to cycle infrastructure, however this is not happening in a lot of cases particularly between Loughlinstown Roundabout and Stonebridge Road where in fact the existing significant cycle lane will be removed.

2. The NTA suggest that they will be providing a cycle lane from Stonebridge Road to St Annes Church when one already exists.
3. The NTA suggest that removing roundabouts in favour of signalised junctions will represent an upgrade with improved pedestrian crossings when no pedestrian issues have arisen to date at the existing roundabout.
4. The NTA claim that putting bus routes and additional lighting in an area will lead to a reduction in anti-social behaviour and theft. That may be true in some areas but they omit to say this will have a negligible impact in the Shankill area as the bus routes are already there and the present street lighting is excellent.
5. There is no mention of the negative impact that running four traffic lanes and two cycle lanes through the heart of our community will have on the area.
6. The NTA quantitative traffic flow analysis was undertaken in November 2019 and February 2020 (Pre-Covid). This is now close to 5 years old. Both traffic flow analyses were undertaken before:
 - a. the completion of new houses on Stonebridge Road (54 units)
 - b. the soon to be completed apartments at Shanganagh Castle (597 units).
 - c. the soon to be completed apartments and houses at Woodbrook (207 no. houses, 478 no. Apartments).
 - d. the opening of the new DART station at Woodbrook.
 - e. the emergence of new flexible working arrangements for locals with the emergence of working from home.

An extract from the NTA traffic flow analysis indicates the following:

Junction Identifier	Junction Name	Type	Movements (vehs)		
			Daily	AM	PM
13-43	Dublin Road/Shanganagh Road	Roundabout	20709	1660	171
13-57	Beechfield Manor/Corbawn Lane	Roundabout	6468	481	575
13-58	Beechfield Manor/LIDL	Priority	4834	257	479
13-59	Beechfield Manor/Shanganagh Road	Signals	13025	1175	1053

7. **The least busy junction in the study area is the Beechfield Avenue / Lidl junction with 4,834 daily vehicle movements. The study also showed 6,468 vehicle movements at Beechfield Manor/Corbawn Lane Roundabout. However, given that there is currently no right-hand turn junction at Beechfield Avenue, the figures fail to reveal how many daily vehicles will now be redirected to the Beechfield Avenue right-hand turn junction or the implications thereof. At present from my experience, it only takes ten cars or one bus and eight cars at the Beechfield Manor/Shanganagh Road to cause back logs. So, based on 2019 figures, an additional 6,468 vehicles may have to navigate this junction i.e. a 50% increase seeking to turn right where no right turn currently exists.**
8. While the significant number of new residents from the new developments mentioned at 6a to 6e above might be an argument for new public transport arrangements, they

also represent additional pinch points for cars at the two junctions mentioned, which may not have formed part of the NTA quantitative traffic flow analysis.

Impact on Trees

Shankill is an area of outstanding natural beauty defined by its location, between the mountains and the sea with its parks and green spaces. Shankill is especially proud of its trees, which have a long history. These trees, due to their maturity, provide many important benefits such as carbon sequestration, mitigation of air pollution, noise abatement, and habitat for wildlife to name a few.

The consequences of the proposed plan are the loss of 420 healthy trees many of which are over 100 years old and the loss of almost 2.5km of hedgerows over the 3.2 Km route between Loughlinstown and Wilford roundabouts. Replacement trees do not replace the number being removed and will take decades to grow to maturity. I have been advised that the number of trees that will be removed is much higher than NTA state in their report.

M11 / N11 Bus Corridor:

(<https://n11m11bpis.ie/>)

No consideration appears to be given to the alternative route along the M11 for some buses. Furthermore, this route has not been investigated by NTA despite the fact that their preferred option at an earlier stage of their investigations was to run a route (2A) parallel to the motorway. *"Route 2A would run parallel to the M11 on a newly constructed busway from Wilford Junction through to Loughlinstown Roundabout and then along the N11 to the Wyattville Interchange;"* This option (2A) was ruled out due to cost and the difficulty with land acquisition, yet now that TII are putting a bus lane on the motorway itself NTA have not re-addressed this option.

Conclusion:

For all the reasons mentioned in our earlier submission, and those mentioned above, we urge An Bord Pleanála to reject these proposals. In essence, the BusConnect Planning Application will have significant unintended consequences.

- **Buses will not be able to get through the Village corridor in peak mornings** simply because of pinch points with traffic backing up past Quinns Road / BBQ Centre, because of the proposed right-hand turn at Beechfield Manor / Shanganagh Road junction.
- Equally, **buses will not be able to get through Dublin Road in peak evenings** simply because traffic will back up because of the proposed right-hand turn at Beechfield Manor / Shanganagh Road junction, and.
- The proposed bus route for a **new M11/N11 Bus Corridor**, we believe **still makes imminently more sense** compared to the NTA Shankill Bus Corridor.

In essence, the proposed right hand turn at Beechfield Manor is a significant weak link in the proposed design and we believe the analysis at the two junctions mentioned have not been thought through and will significantly delay buses coming through the Village or travelling along Dublin Road in both directions.

Finally, I would also express some concern at how An Bord Pleanála has exercised its statutory discretion not to hold an oral hearing and to deal with this solely by written

procedure given the scale of the infrastructure project and the fact that more than 200 objections have been submitted. Fair procedures must surely favour an oral hearing. In this regard, I understand that an oral hearing did take place on MetroLink where points were properly teased out. The issues raised in this case are as complex as those raised in that case.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Denis & Trish Hosford".

Denis & Trish Hosford