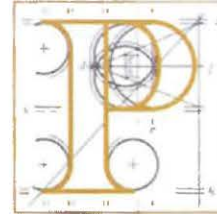


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Michael Greene
Crinken Cottage
Bray Road
Shankill

Date: 07 August 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.

This case is with the Inspector for consideration, we do not have a timeframe for when a decision will be made on this case.

Please note the Board's decision, not to hold 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

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

Breda Ingle

From: LAPS
Sent: Tuesday 16 July 2024 10:12
To: Breda Ingle; Sinead Singleton
Subject: FW: BusConnects Bray to City Centre – Shankill Case Number: ABP – 317742-23
Attachments: BusConnects ABP Case 317742 23 letter from Michael Greene.pdf

Categories: Yellow category, OH Request

From: Michael Greene <[REDACTED]>
Sent: Monday, July 15, 2024 4:39 PM
To: LAPS <laps@pleanala.ie>
Subject: BusConnects Bray to City Centre – Shankill Case Number: 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.

15 July 2024

BusConnects Bray to City Centre – Shankill

Case Number: ABP – 317742-23

Dear Ms O'Reilly,

Thank you for your letter of 17 June. You have invited me to make a submission in relation to the NTA Observations on the Proposed Scheme Submissions issued on 24 May. They did not send any communication to me. I received the notification from you.

Failure to address observations

I expected that the process would involve responses by the NTA to all material specific concerns raised by me and others in a timely manner and not six months later. Instead, the NTA's recent 907-page response gives little acknowledgement, let alone concession, to the many well founded and reasoned observations of the scores of concerned residents who believe that they and others will be adversely affected by these proposals. I note that there are over 160 people have lodged very significant and varied objections to the proposed route along the Dublin Road from the Loughlinstown to the Wilford Roundabouts. In the main, their observations have been noted without modification, at best, or ignored. The obdurate approach by the NTA is well illustrated on page 351 concerning environmental issues "*The NTA are satisfied that the surveys that were undertaken ... fully scoped and undertaken by suitably qualified experts*" and that "*The NTA are satisfied that the EIAR and NIS submitted...are comprehensive.*" While I do not question the expertise of any experts or surveyors involved, I reject the responses to the observations in my 21 pages of submission lodged last October.^[1] I stand by my findings. While the recent submission by the NTA summarises the 17 headings under which I made my observations, the response to my observations being – "*Detailed responses to the issues raised by this submission have been provided in Section 3.9 of the report.*", does not fulfil the obligation of the NTA to respond to my observations. Section 3.9 does not address all the material concerns that I raised. Reading the

observations of many others made to An Bord Pleanála, their observations were met with a similar arrogant and disrespectful lack of adequate response by the NTA.

Another observation addressed by respondents was the construction of an alternative route for bus passengers who want access to Bray but not necessarily through Shankill. The planned TII route along the N11 could be used and the existing routes through Shankill village might continue, with I would suggest recessed bus stops in the village centre for the existing or maybe a modified North/South service. Overall, this would represent a huge saving to the Exchequer without the need to destroy the fabric of one of the few village environments in Dublin. This often-discussed alternative was stonewalled in the response from the NTA.

Inadequate time to make submissions under Section 217B

We were assured that the NTA would respond to our observations within a month or so of filing. At that time last year, it was explained that we would have a month of such response to revert with any final submissions. Apparently the NTA took until 28 May to issue any form of response though not to me directly nor I believe to anyone else who made observations. We were only able to access the document from the NTA following receipt of your letter of 17 June. Today is just two weeks from the final date by which An Bord Pleanála is required to make its decision. As mentioned, the process is flawed in several respects.

Has An Bord Pleanála already made its decision?

CPO order at Barbeque Centre

The proposed CPO at the Barbeque Centre will clearly have very serious adverse consequences for most of the 11 businesses operating from there and is likely to be catastrophic for some of them. I have read the submissions made by some of those businesses and the lack of adequate response from the NTA. This unjustified and disproportionate proposal from the NTA will

- Have a material adverse effect on most of the businesses operating from the Barbeque Centre;
- The CPO will result not only in a significant loss of revenue for most of them, but also cost cutting resulting in jobs being put in jeopardy;
- Local customers being deprived of the goods and services that are provided from those businesses. Customers will simply move elsewhere.

I have no conflict of interest in voicing my strong opposition to the proposed CPO other than that I am likely to be deprived of goods and services provided locally at the Barbeque Centre if this disproportionate and unjustified CPO is permitted.

Oral hearing or in default a modified approval

While I accept that An Bord Pleanála may have adequate grounds for determining the application to develop the route from the City Centre to the Loughlinstown Roundabout through written procedure, I do not accept that there are adequate grounds for determination by written procedure in relation to the route(s) south of the Loughlinstown roundabout without an oral hearing. Many persons concerned with the effect of the proposals for a large variety of reasons have not had adequate responses or been ignored and have been insufficient time to respond to this opaque 907-page submission from the NTA. The NTA's recent submission rejects or ignores without concession so many of the observations of those who have filed submissions.

There are many areas of objection raised by so many to running the Bus Corridor along the Dublin Road between the Loughlinstown and Wilford Roundabouts. The reasons for an oral hearing or a modified approval (see below) are compelling.

To illustrate the unique circumstances concerning the route south of the Loughlinstown Roundabout, I shall repeat just one final observation volunteered by the NTA under the Heading of Loss of Community Green Space. Their recent submission states that in relation to the "community land take impact" along the whole route from the City Centre to Bray, *"Community facilities that are expected to have Negative, Moderate, Long-Term impacts include UCD in Donnybrook, Woodbrook College,, North Wicklow Educate together and St John of God Carmona Services in Little Bray, and Rathmichael National School, St Anne's Church and Resource centre, green space in Castle Farm, and Shanganagh Park and Cemetery in Shankill."* Eight of these nine potentially blighted spaces are south of the Loughlinstown Roundabout. This is just one of very many issues that do not arise to a material degree in other areas along the whole route proposed by the Plan.

The volume and variety of concerns raised by 160 or so residents of Shankill and surrounding area and a few statements mentioned by the NTA itself clearly show that the fabric of this special award-winning village environment will be destroyed if the proposals of the NTA to cause so much damage to the village are approved. The issues raised in Shankill are unique along the City Centre to Bray route. Fair procedure, natural justice and best practice require either

1. an oral hearing to discuss the issues enabling a balanced decision to be made taking the assessment criteria fully into account, and imposing modifications if necessary to meet the needs and acceptance of the affected residents and those who might use the various transport options; or
2. an approval with modifications as suggested in your letter of 13 October 2023. Such modifications should exclude the Loughlinstown to Wilford Roundabout segment along the Dublin Road or require those roundabouts to be linked by the T11 link now proposed by TFI. In the latter case, the Dublin road would be unaffected except perhaps by including recessed bus stops in the centre of the village.

Your sincerely,

Michael Greene

P.S. a signed copy of this message is attached.

^[1] The list of bird species noted by me along the route set out on page 10 of my submission of 23.10.24 should have included the Great Spotted Woodpecker which is regularly observed in gardens and also drumming on trees in the vicinity. The second list on page 11 should have included the long-eared owl and not the short-eared owl.

Michael Greene
Crinken Cottage
Bray Road
Shankill
Co. Dublin
Ireland

Phone: + [REDACTED]
Mobile: + [REDACTED]

CRINKEN COTTAGE
BRAY ROAD
SHANKILL
DUBLIN 18
D18Y9T3

Aisling O'Reilly
Executive Officer
An Bord Pleanála

15 July 2024

BusConnects Bray to City Centre – Shankill

Case Number: ABP – 317742-23

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