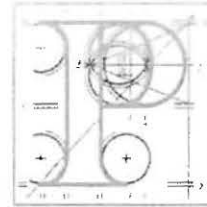


Our Case Number: ABP-317742-23

Your Reference: Shankill Community Action



An
Bord
Pleanála

Transport Analysis & Advocacy Ltd
631 Lisburn Road
Belfast
Antrim
BT9 7GT
Northern Ireland

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

Teil	Tel	(01) 858 8100
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D01 V902	D01 V902

Sinead Singleton

Subject: FW: Case Number ABP-317742-23 Re Bus Connects Bray to City Centre Core Bus Corridor Scheme
Attachments: Follow up TAA Submission on behalf of Shankill Community Action.pdf
Importance: High

From: [REDACTED]
Sent: Monday, July 15, 2024 5:28 PM
To: LAPS <laps@pleanala.ie>
Cc: [REDACTED]
Subject: Case Number ABP-317742-23 Re Bus Connects Bray to City Centre Core Bus Corridor Scheme
Importance: High

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.

Case Number ABP-317742-23

Reference: Shankill Community Action

FAO

Ashling Reilly
Executive Officer
An Bord Pleanála

Dear Ashling

Case Number ABP-317742-23

Reference: Shankill Community Action

15th July 2024

FAO

Aisling Reilly
Executive Officer
An Bord Pleanála

Dear Aisling

Re Bus Connects Bray to City Centre Core Bus Corridor Scheme

I received your letter dated 17th June 2024 inviting me to provide any response to the National Transport Authority's (NTA) response to observations submitted by TAA Ltd on October 10th, 2023, concerning the NTA's plans for the Bray to City Centre Core Bus Corridor Scheme.

I am representing **Shankill Community Action**, Shankill Village, Dublin 18 in their observation on this issue and the organisation has asked me to make a further observation on its behalf following publication by **An Bord Pleanála (ABP)** on your website of the NTA's response to the original submission I made on its behalf.

Please find attached our response to that invitation.

Yours sincerely

Professor Austin Smyth
Transport Analysis & Advocacy Ltd.
c/o 21 Kings Road
Belfast BT5 6JF

Case Number ABP-317742-23

Reference: Shankill Community Action

15th July 2024

FAO

**Aisling Reilly
Executive Officer
An Bord Pleanála**

Dear Aisling

Re Bus Connects Bray to City Centre Core Bus Corridor Scheme

I received your letter dated 17th June 2024 inviting me to provide any response to the National Transport Authority's (NTA) response to observations submitted by TAA Ltd on October 10th, 2023, concerning the NTA's plans for the Bray to City Centre Core Bus Corridor Scheme.

I am representing **Shankill Community Action**, Shankill Village, Dublin 18 in their observation on this issue and the organisation has asked me to make a further observation on its behalf following publication by **An Bord Pleanála (ABP)** on your website of the NTA's response to the original submission I made on its behalf.

Unfortunately, we have had grave difficulties with the deadline set by **Shankill Community Action**. As an experienced professional in the planning area it is apparent the timescale has been unrealistic and unreasonable. This is confirmed when a comparison is drawn with the deadlines afforded to the NTA by ABP during this process to accommodate its submission.

We have therefore found it very difficult to respond in a meaningful way.

Rather than respond point by point to the detailed points made in our submission, NTA has chosen to allocate these to a range of more general points.

We have decided to reply therefore simply to reaffirm that the detailed matters raised in our submission and the recommendations made on the basis of extensive collection and collation of verifiable survey data, analysis and professional insights have all but been ignored in the response from the NTA.

The relevant matters not addressed in the NTA response can be summarised as follows.

- 1. Addressing uncertainty about the efficacy of the Proposed Scheme: Improving the Core Bus Corridor between Shankill and Bray with modified routings and low cost supporting infrastructure and traffic management (extracts from Section 8 in the original full submission)**

The uncertainties about the robustness of the forecasts of travel demand referred to above in addition to observations on the alternatives assessment process pose questions about the efficacy of

the Proposed Scheme for the Bray – Dublin City Centre Corridor, a key element of the overall BusConnects Dublin programme.

Uncertainties in forecasting, costs, route options assessment and the PBC

The scale of public spending involved and evident uncertainty about the robustness of the forecast travel demand patterns attributable to the Proposed Scheme point to an urgent requirement to undertake an update of the Preliminary Business Case for the BusConnects programme including the Proposed Scheme as it currently applies to the Bray – Dublin City Centre Corridor. This will help ensure it offers society value for money.

Of particular relevance is the timeliness of the data input to the demand mode system. Moreover, in the case of the Bray- City Centre Corridor scheme the level of disaggregation and detail concerning travel behaviour at the southern end of the corridor that was employed in the analysis is of real concern. This is particularly important in assessing the efficacy of Route Options as set out under the Stage 2 Assessment in the NTA's EIAR Chapter 3.

Bespoke survey programme for the Shankill - Bray sections of the Proposed Scheme

In conjunction however, with the observations made in this submission concerning the limitations in the data used and the uncertainties in the mode projections for input to the assessment of the proposed scheme set out in Section 4 of this submission (Chapter 4 of the EIAR) as it relates to Sections 3 and 4 of the Bray – Dublin City Centre corridor, this prompted the client to undertake bespoke survey of travel behaviour in the corridor's southern end (Shankill and Bray).

The survey comprises two elements, the first a comprehensive monitoring of bus loadings on approaches to the Shankill series of bus stops and on leaving the Shankill area and counts of passengers getting off and boarding buses within Shankill. These surveys were mounted throughout the day over an extended period during September 2023.

The second element of the survey programme was undertaking interviews among intending passengers boarding buses in Bray on their way northward through Shankill to identify travel patterns, and characteristics of passengers in part to determine how many were intending to leave the bus within the section Wilford roundabout and Loughlinstown roundabout. The purpose of this was to determine the proportion of passengers for whom Shankill was their destination.

Implications of the findings for bus route planning to/from Bray on the Bray – Dublin City Centre Corridor

It is important to note that the NTA's projected increase in peak hour demand would imply a requirement for an additional 10-15 buses per hour city bound over the Do Minimum option in 2028. There are question marks over the ability of the N11 through Shankill to absorb up to an additional 30 buses per hour two way through the village even with the proposed arrangements set out above in Section 4 (Chapter 4 of the EIAR).

These observations based on the NTA's own projections, together with the findings generated by the bespoke survey programme reported in this section (undertaken by TAA in association with Shankill Community Action) lend support to the case to implement a bus service pattern on the 145/155 (E spine) that would see 50%-60% of peak hour services continue to operate through Shankill Village serving existing or relocated stops between Wilford Roundabout and Loughlinstown Roundabout, thereby maintaining a 10 minute frequency in the village. The findings from our survey programme

indicate this would maintain a quality service for residents and visitors to Shankill while offering an improved service to residents of and visitors to Bray.

At the same time this proposal would yield savings in capital spending and operating costs incurred by the Government and by or defrayed by its agencies. **Simply rejecting the proposal to make use of the N11/M11 off and on ramps and the planned N11/M11 Bus Priority Interim Scheme's dedicated bus lane on the basis of repurposing it does not invalidate this proposal's potential.**

40%-50% of services (at least during peak periods) would operate non-stop between Wilford Roundabout and Loughlinstown Roundabout via the N11/M11 off and on ramps and the planned N11/M11 Bus Priority Interim Scheme's dedicated bus lane along the section of existing N11/M11 route extending to Loughlinstown roundabout in the north and southbound from there to the N11 offramp at N11 (Junction 5 approaching Wilford Roundabout) again on the planned dedicated southbound bus lane.

The impacts of this arrangement would include:

1. Obviating the need for extensive and intrusive felling of 400 trees and removal of substantial lengths of hedgerow between Loughlinstown Roundabout and Wilford Roundabout.
2. Obviating the need for land take and removal of old stone based walls.
3. Obviating need for traffic management restrictions including at Shanganagh Road/Beechfield Manor/ Corbawn Lane.
4. Reduced peak hour bus journey times in the corridor to/from Bray by 3.5 minutes at little or no extra capital cost compared to the proposed scheme. This compares favourably with an estimated total saving of 5.9 and 7.3 minutes (peak inbound and outbound) for the proposed overall scheme as submitted to **An Bord Pleanála**.
 1. Maintenance of at least a 10-12 minute frequency through Shankill
 2. Maintaining capacity for intending passengers in Shankill
 3. Maintaining access to Shankill and planned DART station for passengers intending to alight/board between Wilford and Loughlinstown
4. Reduced likelihood of bus bunching and improved punctuality of services
5. Reduced bus operating costs through reduced Peak Vehicle Requirement (PVR) given the round trip time savings for vehicles serving the corridor.

2. Key Issues and Recommendations arising from this review of the Proposed BusConnects CBC programme for the Bray – Dublin City Centre Corridor (extracts from Section 9 in the original full submission)

Overview of Key Issues

Growth forecasts in bus use purely attributable to the CBC infrastructure bus priority measures seem optimistic when linked to the estimated bus journey time savings and indicators of improved bus service punctuality applied by the consultants in their analysis.....

These projections of very large modal shifts pose important questions concerning the timeliness of the travel related data employed, together with the robustness of the forecasts generated, by the forecasting tools employed. Addressing questions about the robustness of these projections would require in-depth review of the validation performance of the models, as well as application of realism testing and sensitivity testing.....

.....Uncertainties about the robustness of the forecasts of travel demand also pose very substantial questions about the efficacy of the Proposed Scheme for the Bray - City Centre Corridor.....

Key Recommendations

Notwithstanding the concerns of the client organisations reflected in this submission the client lends its support in principle to the Proposed Scheme for the Bray– Dublin City Centre corridor. However, this comes with a requirement for amendments to the scheme where it is currently envisaged to operate on the approaches to and through Shankill.

These stem from a continuing and widely held concern regarding the impact on the local environment and restrictions on residents' access to certain arteries attributable to various highway and cycle provision realignments and traffic management arrangements contained in the scheme as currently proposed.

Despite amendments to the NTA consultants' plans as a result of the route alternatives assessment process, an audit undertaken by local residents has estimated 400 trees would be felled under the Proposed Scheme, many of them mature trees. It is noted that in Chapter 4 of the EIAR submitted by the NTA to An Bord Pleanála more than 50% of references to potential risk to/ felling of trees in the entire corridor relate to the approximately 3 kilometres between Loughlinstown roundabout and Wilford.

Moreover, there is a belief that the scheme as currently proposed for the village may not be necessary in the light of the proposed use of the N11/M11 Bus Priority Interim scheme currently being designed by a multi-authority team from the local councils, the TII and NTA. Adoption of a modified Route2A as set out above (Route 2A was cited in Stage 2 of the route alternatives assessment process for Section 3 of the corridor) would achieve its favourable performance, particularly in relation to environmental impacts and land take referenced by the NTA Consultants but without the expense referenced by the consultants as their reason for rejecting their own design for Route 2A.

It would also afford a higher quality bus service to people travelling to/from Bray from points north of Loughlinstown Roundabout, while maintaining a high quality service to and from Shankill. Moreover, this proposal to take advantage of the N11/M11 Bus Priority Interim scheme currently under development, would increase bus journey time savings on the corridor for end to end

journeys by between 48 % and 59%, this being achievable at reduced capital costs and reduced bus operating costs compared to the current Proposed Scheme.

Recommendations

- I. Pause advancement of the Proposed Scheme pending;
 - a transparent assessment of the proposed alternative scheme set out in this submission for the Bray – Dublin City Centre Corridor scheme encompassing Sections 3 and 4 of the route alternative assessment process that is subject to independent scrutiny by experts.
 - this would also encompass submitting findings to public consultation and a comprehensive survey of residents, businesses, regular users of facilities in the corridor as well as other stakeholders.
 - determination of the outcomes of execution of recommendations II-VI
 - *replacement of the Proposed Scheme for the Bray – Dublin City Centre Corridor with a revised scheme to reflect the outcomes of execution of recommendations I-VI.*
- II. Comprehensive review to be undertaken of key elements of the Easternn Region Model (ERM) and Local Area Model (LAM) in conjunction with corridor micro-simulation models and junction models. This would pay particular attention to behavioural sensitivity to various level of service, validation performance and in relation to other performance indicators. The task would include reviewing the elasticities employed in yielding demand projections for a range of public policy interventions. It would also involve applying realism testing and sensitivity testing. It would seek to reconcile the demand forecasts generated for the EIAR with the model parameter values and provide an in-depth explanation of the findings of a series of specified realism and sensitivity tests.
- III. Specification, development and application of a robust cycle trip forecasting tool including undertaking comprehensive validation of the model. Ensure it is compatible with the existing suite of travel demand and traffic models employed by NTA to inform development and or refinement of the Proposed Scheme.
- IV. Independent review to be undertaken of the timeliness of and coverage of the data inputs to the suite of transport models employed in developing forecasts of travel demand and associated spatial travel and traffic patterns. This would take into account the changes in activity behaviour patterns that have been emerging since the beginning of the COVID-19 pandemic including the incidence and pattern of working from home as well as other changes in spatial movement patterns.
- V. Comprehensive survey to be undertaken of travel behaviour, access to transport alternatives among residents of and visitors to the corridor including commuters, as well as their demographic characteristics.
- VI. Updated and independent review to be undertaken of the Preliminary Business Case (PBC) for the BusConnects programme (including the Proposed Scheme (or variants)) as it applies to the Bray – Dublin City Centre Corridor, and undertake an updated PBC for a The 'Do Something' scenario and a 'Do Minimum' scenario (Opening Year 2028, Design Year 2043). The updated PBC would be informed by completion and delivery of recommendations III – VII. This will ensure an appropriate scheme for this corridor could offer society maximum 'value for money'.

We submit NTA should be asked by you to reply point by point to the observations we made and highlighted in our 'yellow boxes' in the submission, so that An Bord Pleanála has all the responses to hand and you should defer any decision until they do so.

We think it is unsatisfactory in the extreme that no oral hearing is to be held as this would seem to be the only route to extract reasoned explanations from NTA of any of these points. We respectfully ask that you consider this decision again or find some other mechanism to extract answers to which we can respond to the important issues raised.

Yours sincerely

Professor Austin Smyth
Transport Analysis & Advocacy Ltd.
c/o 21 Kings Road
Belfast BT5 6JF