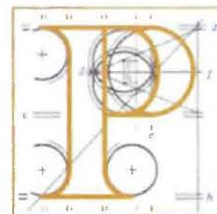


**Our Case Number:** ABP-317742-23



An  
Bord  
Pleanála

Shankill Tidy Towns  
c/o Eoin McBennett  
Littlegrange  
Stonebridge Road  
D18 H0X3

**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.

I can confirm that the original submission has been uploaded correctly to the Board's website, which was an administrative error but has now been rectified.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto: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

Tell	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Breda Ingle

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**From:** LAPS  
**Sent:** Tuesday 16 July 2024 10:19  
**To:** Breda Ingle; Sinead Singleton  
**Subject:** FW: Reference number ABP-317742-23  
**Attachments:** STT SCA Jul24 SubmissionNTA.docx

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**From:** eoin mcbennett <[REDACTED]>  
**Sent:** Monday, July 15, 2024 5:17 PM  
**To:** LAPS <laps@pleanala.ie>  
**Cc:** Shankill Matters <[REDACTED]>  
**Subject:** Reference 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.

Attention: Aisling Reilly

- A. Reference number: ABP-317742-23.
- B. Name & Address: Eoin McBennett, Littlegrange, Stonebridge Road, D18 H0X3 - on behalf of Shankill Tidy Towns.
- C. Shankill Tidy Towns, Station House, Station Road, Shankill, D18 N1N2.

Please see attached submission. Please also note that the version of Shankill Tidy Towns original submission available on your website is incomplete as it only includes every second page we would be most grateful if you could amend this and also explain how this occurred.

Best regards,  
Eoin McBennett,  
Shankill Tidy Towns.



## **Shankill Tidy Towns**

**In collaboration with Shankill Community Action**

### **Submission to An Bord Pleanála**

**NTA Submission May 2024**

**Bray to City Centre Core Bus Corridor Scheme 317742**

**July 2024**

**Submitted by: Eoin McBennett, Littlegrange, Stonebridge Road, Dublin D18 H0X3**

The NTA Submission, at almost 1,000 pages, is very long. In fairness, the section on the Shankill area is quite substantial at 185 pages. This, no doubt, reflects the huge number of observations made in respect of Shankill. The sheer length of the submission reminds one of the old saying *"I would have written you a shorter letter. but I didn't have time"* - this despite a number of time extensions granted to the NTA, although such extensions are not available to the general public.

One might also compare the NTA approach to that of the American lawyer, compelled by a court to release certain key documents, releases so much documentation that it is virtually impossible to find the key documents. Similarly, it is very difficult to find any commentary in the NTA submission which refers specifically to the points raised in Shankill Tidy Towns original observation, or indeed to specific circumstances that arise in respect of Shankill, which are noted in many of the observations submitted.

In general, the NTA submission relies extensively of justifications for the overall BusConnects Bus Corridor Scheme and how it is a key component of longer term national and regional planning. Frankly, much of their submission is patronising waffle, seeking to capitalise on the unquestioned widespread support for the scheme, without addressing the specific issues raised. Our original observation states the ***"Shankill Community Action (with which the Shankill Tidy Towns observation was associated) supports the BusConnects project in principle but challenges its unsustainable and damaging plans for Shankill and seeks a better balance between progress and preservation, meeting future transport needs while retaining the unique charm of Shankill"***.

For example, a key aspect of Shankill Tidy Towns observation is that the extension of the Bus Corridor is unnecessary for several reasons, including the current excellent bus service, limited scope for further development along the narrow coastal strip, and concurrent proposals to create bus lanes on the M11 bypass of Shankill to service development in North Wicklow and beyond. The NTA's response to this key point seems to be that while the BusConnects Corridor is a metropolitan issue, the N11 is a regional one. As with other key observations made by Shankill Tidy Towns, this



response fails to recognise the specifics of Shankill, in particular its location between the mountains and the sea. Indeed, the sheer length of the Bray Bus Corridor, when compared to all other proposed corridors must raise serious questions over the appropriateness of a “metropolitan” solution in this case. This is the only example, among all proposed Dublin Bus Corridors, where there is literally no alternative to the proposed route other than the nearby motorway. The only other viable route, Ferndale Road, is a country road, which will come under serious pressure if proposed development proceeds in Rathmichael and Old Conna. This means that there are no options for one-way routes to alleviate traffic pressures.

Similarly, the very real concerns of residents in the Corbawn area are rather glibly dismissed, as are concerns over the impact the removal of roundabouts at either end of Shankill Village, which at a minimum will result in a significant increase in three-points turns on Main Street.

The key points made in our original submission remain and may be summarised as follows:

- **Is a Core Bus Corridor through Shankill really necessary?**  
Is there is any value in routing this Bus Corridor through Shankill, given the upheaval, distress, damage to the environment, impact on biodiversity and cost involved.
- **Why not use the M11?**  
It is critical that the current proposals are evaluated against the alternative of supplementing the N11/M11 BPIS with appropriate, limited improvements to the route through Shankill to facilitate the expected E1 service level. It would also be helpful if the NTA were to provide details of the evaluation process rather than just generalised comments.
- **Why are there no Proposals to Improve the Public Realm in Shankill?**  
Changes to the proposals to date have been designed to reduce their negative impact on the public realm, with little or nothing positive added.
- **What will be the Impact on the Community of Shankill?**  
The Bus Corridor is likely to have negative impact on the physical and mental wellbeing of residents.
- **What will be the Impact of Revised Traffic Arrangements?**  
Further consideration should be given to traffic calming measures, avoidance of rat-runs through Main Street and improved pedestrian and cycling facilities.
- **What about the Impact on the Environment?**  
The proposals should be evaluated for compliance with environmental regulations, including a specific review of the environmental impact on the Shankill area.

## **Conclusion**

As stated in our original observation, the BusConnects proposals for Shankill do not reflect a deep understanding of the locality... the beauty and charm of Shankill that is being placed at risk.

**Please do not destroy our unique and charming community.**