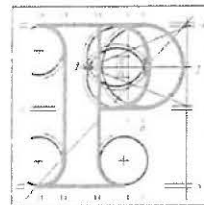


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Siobhan Mac Cobb
16 Holly Park
Corbawn Lane
Shankill
D18 DK30

Date: 24 July 2024

Re: BusConnects Bray to City Centre Core Bus Corridor Scheme
Bray to Dublin City Centre.

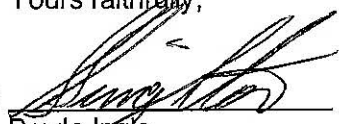
Dear Sir / Madam,

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	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde
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Dublin 1
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Sinead Singleton

Subject: FW: ABP-317742-23 Bus Connects Bray
Attachments: NTA JULY 7pm.docx

From: Siobhan Mac Cobb [mailto:siobhan.maccobb@pleanala.ie]
Sent: Monday, July 15, 2024 1:07 PM
To: LAPS <laps@pleanala.ie>
Subject: ABP-317742-23 Bus Connects Bray

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.

Dear Aisling,

Please find attached my response to the NTA's response to my observations.

Thank you for the opportunity.

Yours sincerely,
Siobhán Mac Cobb

Reference: ABP-317742-23 (Bray to City Centre Bus Corridor Scheme)

Name: Siobhan Mac Cobb, PhD, MSc, Dip. COT.

Address: 16 Holly Park, Corbawn Lane, Shankill, D18DK30

Acting on my own behalf.

Introduction

I wish to present my observations to you concerning the NTA's ABP-317742-23 (Bray to City Centre Bus Corridor Scheme) response dated 24th May 2024 on their proposals related to St. Anne's Church roundabout; Corbawn Lane; Shanganagh Road and Beechfield Manor junctions (Junctions 38 and 39). Their response does not adequately address my observations.

My main observations were that (1) the consultation process was inadequate in relation to Shankill's unique population of elderly and vulnerable residents; (2) that the claims of benefit to journey times in relation to the proposed changes to Shankill were unsubstantiated and omitted alternative options; and (3) there is the possibility of harm to the quality of life of residents in the Beechfield Nursing Home and Independent Living complex who live directly beside the proposed junction changes, to their personal safety and that of vulnerable pedestrians including school children accessing two primary schools north/west of Shanganagh Road, and to quality of life of those who live in the Corbawn Lane area.

1. Consultation Process is Inadequate.

Aarhus standards (1998) were not applied in the consultation process with reference to Shankill's unique population of elderly, vulnerable and disabled people who will be directly impacted by the changes to Junction 38 and 39 as detailed in my earlier observations. Their views were not sought and their needs were not identified for consideration in relation to changes at Junction 38 and 39.

There is no acknowledgement by the NTA in their response to my observations that the such a unique population lives directly along the route of the proposed changes on Dublin Road, Main Street, Shanganagh Road and Beechfield.

An Bord Pleanála has a responsibility to ensure that the principles of the UNECE Environmental Policy on Public Participation should be adhered to when such significant environmental change proposed by the NTA BusConnects is being forced on citizens. State funding cannot be used, or public institutions cannot allow such a development when some citizens in the community affected have not been able to assert their rights to participate in decision making, and were not given appropriate assistance in order to do so.

In addition to aging and vulnerable people in the 'general' population, Shankill also includes a unique constellation of supported housing complexes who will be directly impacted by the proposals.

They are as follows:

1. The Beechfield Haven and Maryland Independent Living complexes, located on Beechfield and Shanganagh Road comprised of a total of 55, one and two bedroomed apartments in the grounds of Beechfield Manor Nursing Home. A requirement is that the resident is aged over 55 years.

2. Beechfield Nursing Home. Beechfield/Shanganagh Road. This is a care home for 68 residents. It has been part of village life for over thirty years, with its residents, staff and visitors using shops, pub and religious services.
3. Elveria, Saint John of God Services, Dublin Road. This residential complex for people with intellectual disabilities was an innovative supported living service when established over twenty years ago. Its long-term residents take part in the daily life of Shankill, shop locally, go to the pub, use the bus and Dart and contribute to community life.
4. Parkview, Shanganagh Road, Sunbeam House Services is another residential supported living home for people with intellectual disabilities.
5. Sunbeam House Services, Main Street. This service supports 40 people with intellectual disabilities, who when availing of its respite services, enjoy the resources of Shankill in the company of friends.
6. St Joseph's Shankill, Dublin Road, is the largest care home in Ireland dedicated to dementia care. It has links with the village community, has an award-winning volunteering programme, and it employs local people.

The above are part of the 'population' and part of Shankill. Town planning factors must give attention to the unique characteristics of this population. The public consultation process did not give consideration to the specific capacity and interests of all citizens in Shankill and made no effort for transparency and accessibility of the information explaining the possible impacts of the proposed changes on the daily lives of those who live here. I expect that An Bord Pleanála should acknowledge that our citizens who require additional supports in accessing information were not granted it in order to exercise their rights as required by the Aarhus Convention on access to information, public participation in decision making and access to justice in environmental matters (Aarhus, Denmark, June 1998).

The NTA response of May 24th 2024 fails to acknowledge the omission of this unique population in their consultation process and as such, it is inadequate and below the required standards for the allocation of public monies.

2. Unsubstantiated Claims of Benefit.

Here is no evidence presented with specific reference to Shankill that proves that the busses will go any faster through the village than at present. Currently, when the bus stops, it blocks traffic behind it, thereby allowing a clearway when it starts again. Thus, the bus controls the traffic flow very effectively through Shankill until it reaches the Loughlinstown roundabout. There is a dedicated bus lane from there. Claims of 'benefit' of the NTA proposals should consider the validity of their calculations including the proposed speed limit of 30 KM per hour.

Consideration of the fully costed alternatives to the Shankill proposals have not been presented. Of course, if shorter journey time is the main objective, fewer bus stops would

improve speed, as would pre-pay only tickets (though this may make bus use less attractive). These factors have not been identified as possible contributing 'benefits' within the Shankill section of the route. Also, providing more express busses from Bray to Dublin, bypassing Shankill at busy times will deliver shorter journey times.

One of my main objections to the NTA's proposals was in regard to the roundabout at St Anne's church. From my observations and my experience of use, it promotes very effective and safe traffic flow from four roads, as all traffic must slow down on approach and yield as the lane width is narrow. The NTA's response has not counter-argued this in its document of 24th May, 2024. A generalised statement on the rationale for replacing the St. Anne's roundabout with traffic signals states:

"The upgrade of the roundabout to a signalised junction results in reduced corner radii and narrower lane widths to encourage slow vehicular speeds thus enhancing road safety." (p. 297)

However, in this instance, road widening is to be carried out to introduce an extra lane of traffic for a right turn eastwards off Shanganagh Road at Beechfield. The removal of the roundabout and the introduction of an additional traffic lane on the Shanganagh Road seems to contradict the above. This is clear evidence of a 'cut and paste' response by the NTA to genuine and informed concerns of Shankill residents.

No data on the 'time saving contribution' arising from the proposed massive changes to Junction 38 and 39 have been presented. In the absence of such evidence, there is no justification on these grounds for removal of the roundabout and the introduction of an additional traffic lane.

3. Causing Harm

The creation of the additional lane on Shanganagh Road (Junction 38 and 39), and closure of Corbawn Lane for access to Dublin Road will make the junction outside of Beechfield Nursing Home and Marylands one of the busiest and most complex junctions in Shankill. The pedestrian crossing from there to the back of the church is also the most used route by schoolchildren for those who live east of Shanganagh Road, and for bus and DART passengers who live west of it.

A previous attempt to introduce traffic restrictions on Corbawn Lane was abandoned. Egress was seriously impacted and congestion was severe at busy times. That experiment was conducted long before the development of the LIDL complex, the major shopping hub in Shankill and when the population was smaller. Shankill now has a population of approximately fifteen thousand people. The complex hosts a large supermarket, a creche and childcare service, two GP practices, a pharmacy and a coffee shop.

The current traffic flow takes best advantage of the traffic needs of the area, and is a product of good traffic planning related to the development of the LIDL complex.

It is likely that the proposed changes will impact on several cohorts of vulnerable citizens; the residents of the above nursing home and the Independent Living complex; the many pedestrian users of the pathway at the back of the church using the Dublin Road bus stops; children walking to two primary schools; church goers; users of the various services and

courses held in the Resource Centre; those walking to the DART and the pedestrian shoppers going to the LIDL complex from north or west of Shanganagh Road .

The NTA notes that:

"a number of submissions raised concerns over the justifications of replacing the St. Anne's roundabout (Dublin Road/ Shanganagh Road/ Corbawn Lane junction) with traffic signals. They note concern that this will increase traffic congestion and create queues." (p.298)

Their reference to the solution to this busy junction area is the installation of an additional lane for right hand turning eastward from Shanganagh Road, an additional slip road for left turning, and the prevention of direct access to Dublin Road from Corbawn Lane, all controlled by a series of traffic signals, points to a lack of regard for an informed community rejection of their proposals. Changes to traffic flow did not work before and will cause havoc again for no benefit to the stated objective of a faster bus journey through Shankill.

The NTA show little understanding of the potential harm for imposing the high traffic volume to the area with the most frequently used pedestrian crossing in the village (the junction outside Beechfield) or of the impact this will have on the community environment, and of the barriers to social inclusion (DMURS, 2023, p28) related to sensory overload from traffic noise, including huge articulated truck deliveries, excessive beeping of pedestrian crossings lights, increased traffic busyness promoting general over alertness and increasing perceived threat of accident. This is particularly relevant to the elderly and disabled residents who live immediately beside the junction at Beechfield. (My initial submission, informed by professional experience in disability and social inclusion, discussed this matter more fully.)

In relation to the risk/benefit ratio, I note that there is an absence of evidence of the significance of 'estimated' time saving related to the removal of the roundabout within the overall bus journey time between Bray and Dublin. For example, what difference would an average saving of 30 seconds on a 55 minutes journey time make to an average passenger. This is discussed this more fully in my earlier submission. However, it is clear that the destruction of the current road layout, removing the significant place marker and seasonally planted roundabout, taking land from the curtilage of the church (a protected structure) and destruction of old stone walls will damage Shankill's sense of place. This is an important feature worthy of protection and there is no justification for its removal.

There has been no acknowledgement in the NTA's response to my submission of the damage to the 'sense of place' that their proposal will bring, or is there a recognition that participation and belonging to a vibrant, active, engaged community is a most valuable component for quality of life. DMURS (2023) street design guidelines highlight the importance of sense of place.

"Whilst the movement of traffic is still a key issue, there are several others, including the 'sense of place' which are of core significance to the creation of safe and more integrate street designs." (DMURS, 2023, p.26) This is considered particularly important for vulnerable and frail elderly people who spend most of their daily life in their local community.

Although the NTA has little appreciation of such matters I expect An Bord Pleanála to give wider consideration to this aspect especially in light of the lack of evidence of journey time saving by this destruction, and/or in comparison with the potential options of prepaid tickets, express bus routes via the N11 and the rearranging of lesser used bus stops.

Shankill is a vibrant and growing village, its population is inclusive, and is not afraid of change. However, basic logic and observation must acknowledge that it is the bus speed through the village is the factor that dictates traffic flow, when the bus stops, it holds up the traffic, including other busses, and then it drives forward into a clearway. The unsupported claims about journey time savings related to the massive traffic flow alterations at Junction 38 and 39 have not been critiqued in the light of probable harm to quality of life, pedestrian safety and efficient traffic flow. The limitation of the NTA's response to the issued I have raised are a clear indication that they also must acknowledge that their proposals for this Shankill section of the Bus Connects must be dropped.

Thank you for the opportunity to make this response,

Yours sincerely,

Siobhan Mac Cobb PhD. MSc. Dip. COT

Long Term Resident.