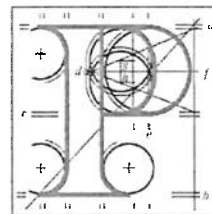


Our Case Number: ABP-317742-23



An
Bord
Pleanála

Shankill Tidy Towns
c/o Eoin McBennett
Littlegrange
Stonebridge Road

D18 H0X3

Date: 11 October 2023

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 submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this 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,



Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



Shankill Tidy Towns

In collaboration with Shankill Community Action

Observation to An Bord Pleanála

Bray to City Centre Core Bus Corridor Scheme 317742

October 2023

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

Shankill

Shankill is a growing suburb of Dublin, beautifully situated between the mountains and the sea.ó

Dating from the late nineteenth century, the relatively young suburb of Shankill evolved as a community with low rise buildings, picturesque gardens, tree lined roads, stunning mountain vistas and attractive wooded areas and parks. A short walk from the seafront on Killiney Bay or from the wooded hillsides of Rathmichael and Carrickgollogan, Shankill is a very special place with a unique charm.

Shankill retains a village atmosphere with a rural aspect, emphasised by its woodlands and roadside hedgerows. It is a very pleasant place in which to live, with a great community spirit. There are numerous local sports clubs, great schools and many wonderful local amenities.

Trees have long been a major feature of the Shankill area. Peter Pearson, in his book, ***Between the Mountains and the Sea***, notes that a local landowner was awarded a gold medal by the Royal Dublin Society for planting and maintaining 38,000 trees, many of which are still flourishing.

Modern Shankill is unusual in that it has evolved relatively recently from a prosperous rural parish, noted for its many grand houses and fine granite walls, which remain a feature of Shankill today. The approach road from Bray is relatively unusual with granite walls on both sides of the road. Given its rural origins, the older public buildings of Shankill are spread over a very large area. In the late nineteenth century, land evictions in the area led to the emergence of a village, which became known as Shankill. In the twentieth century, this grew into a substantial community.

Today, its numerous parks and green spaces are a feature of Shankill. Many are linked, so that it is often easier to travel on foot between different parts of the community. The Dublin Mountains Way, a way-marked long-distance walking trail runs for 40 kilometres through the Dublin Mountains from Shankill to Tallaght. This route brings walkers to Rathmichael Wood, Carrigollogan, Barnaslingan and the Scalp. Beyond Glencullen, it crosses the Wicklow Way, connecting Shankill to both Marley Park and locations in Wicklow such as Roundwood and Glendalough. Other shorter walking routes link Shankill to Deansgrange, Cabinteely and Enniskerry, while the Bray Camino passes through on route to Killiney, Dalkey and the City Centre.

Future challenges include ensuring the evolution of infrastructure and facilities to cater for its existing population and balancing future growth to ensure the preservation of those features that are cherished by the community.

Shankill first entered the National Tidy Towns competition in 1997 and won its first bronze medal in 2011. It has won a medal every year since and in 2022 won its first gold medal. This success reflects the excellent community spirit as well as the effort made, not just on tidiness and cleanliness but also on issues such as nature, biodiversity, climate change and heritage. As one of a small number of community-based action groups in the area, Shankill Tidy Towns play an active role in the development of Shankill.

The initial 2017 proposals by the National Transport Authority for a Bus Corridor through Shankill, provoked a strong adverse community reaction because of major tree loss along the principal approach roads and the general disruption to the community. Shankill Tidy Towns played an active role in responding to these proposals. While some modifications have been made to the plans during the consultation process, particularly in Shankill Village, the current proposals remain, in our opinion, destructive, disruptive and expensive but, most importantly, totally unnecessary.

Shankill Community Action

Shankill Community Action is a group representing local residents, neighbourhood groups, businesses and public representatives, and established community groups, including SAGE and Shankill Tidy Towns. It includes a broad spectrum of the Shankill community, including Save Shankill Village, which organised an online petition on the proposals which secured over 3,300 signatures seeking to change the proposed bus corridor.

Shankill Community Action 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.

The BusConnects proposals for Shankill are economically unsound, socially unacceptable and environmentally disastrous and contravene DLR's Biodiversity Action Plan, DLR's Tree & Urban Forest Strategy and their Climate Change Action Plan. We are also of the opinion that the proposals are not compliant with the legally binding provisions of the Aarhus Convention.

Shankill Community Action support alternative and more viable proposals which maintain Shankill's excellent bus service, specifically that:

- The main Bray to City Centre Core Bus Corridor follow the N11 between the Wilford Junction and Loughlinstown Roundabout, using the proposed N11/M11 Bus Priority Scheme, currently being actively progressed by Wicklow County Council on behalf of a number of stakeholders, including Transport Infrastructure Ireland and the National Transport Authority. <https://n11m11bpis.ie/>
- Express services to and from Bray, together with buses serving Greystones, proposed developments at Fassaroe and Old Conna and Park & Ride facilities on the N11, use the N11/M11 corridor.
- Shankill's excellent bus service be maintained, with only buses serving Shankill and Bray going through Shankill - the 145, 155 and 45A routes, and their proposed successor routes E1 and 211, should continue through Shankill – importantly, there should be no reduction in the number of buses through Shankill.
- Limited improvements be made in Shankill to improve traffic flows and enhance the public realm and safe active travel, including an appropriate cycling network.

Shankill currently enjoys an excellent bus service to Dublin City Centre. During weekdays, the 145 route, between Ballywaltrim and Heuston Station, operates every 10 minutes and the 155 route, between Bray Station and IKEA, every 20 minutes. That is 9 buses to and from the City Centre every hour. These buses typically pass through Shankill without significant delays.

When the proposed BusConnects route changes are implemented, the 145 and 155 routes will be replaced by the new E1 route from Bray Station to Ballymun. It is not proposed to increase service levels, so there is no reason to expect that there will be any particular delays, even with the existing road layout.

There could, however, be limited improvements which would improve traffic flows. Suggestions have included recessed and relocated bus stops, particularly for the Aircoach, and restrictions on right-turns while the Quinn's Road and Stonebridge Road junctions could be improved.

The proposed dedicated bus lanes will bring little benefit if the bottleneck at Bray is not dramatically improved. Instead of these unnecessary bus lanes, which may also serve to increase car traffic through Shankill, consideration should be given to preserving the environment and improving facilities for cyclists and pedestrians.

Is a Core Bus Corridor through Shankill really necessary?

Shankill currently has an excellent bus service and is not subject to significant traffic delays, with the existing location of bus-stops on Main Street a major factor in any delays that do arise.

- As no additional buses through Shankill are proposed and there are no significant delays at present, why is this proposal being progressed?
- As current bus times through Shankill are similar to those that would be enforced under the proposed 30Kph speed limit, will there be any actual time saving?
- A factual, data-based, environmentally sound justification for the proposals is essential. No data or environmental or social impact studies have been provided, despite numerous requests.
- The NTA have not provided evidence that the proposed arrangements will result in any improvement in bus journey times through Shankill.
- No data or justification has been given for the need for any major work south of Shankill Main Street. The initial planning and research documents clearly stated that no time gain would be made from work in this location.
- Routing buses, directly or indirectly serving passengers from locations south of Bray, through Shankill increases risks that buses will be full before reaching Shankill.
- While the removal of previous proposals to have bus lanes on Shankill Main Street is very welcome, this key location will continue to be a possible pinch point under current proposals.
- In this context, the creation of four-lane highways between the Wilford Roundabout and Crinken Lane and between Stonebridge Road and Loughlinstown Roundabout will only serve to speed buses to bottlenecks at Bray, and possibly also at Loughlinstown and Shankill Main Street.
- It is also worth noting that Bray Corridor, at 18 kilometres is significantly longer than the next longest of the proposed Core Bus Corridors, the Corridor to Swords, which is approximately 13 kilometres. Other proposed corridors are much shorter.
- The current proposals do not give due consideration to the local geography. The distance between the sea and the mountains at Shankill is approximately 2Km. In this narrow corridor,

there is a major motorway, a railway line, a country road (Ferndale Road) and Shankill with a current population of 10,000, soon to grow by, perhaps, 3,000.

- The long-term impact of Covid-19 on home-working and long-distance commuting is not yet clear but raises questions about the NTA's assumptions on future demand for bus travel. With greater emphasis being placed on making cities and towns more liveable, significant changes in commuting patterns are to be expected.
- Similarly, concerns about climate change and biodiversity will increase pressure to limit urban sprawl. Concerns that construction of motorways facilitates excessive urban sprawl may also apply to the construction of four-lane bus corridors.
- All this begs the question as to whether 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.

Route Selection

The route selection process is detailed in the Feasibility and Options Report dated 1st December 2017. The NTA selected 5 options for the section between the Wilford and Loughlinstown roundabouts:

- **Option 2A:** A Bus-Way Parallel to the M11.
- **Option 2B:** Through Shankill, on existing roads R119 and R837.
- **Option 2C:** On the R119 from Bray turning on to Crinken Lane, then joining a newly built bus-way parallel to the M11 to Loughlinstown Roundabout.
- **Option 2D:** Buses would follow the same route as 2B, but general traffic would be diverted around Shankill Village using a newly constructed road on the same alignment as that proposed for the bus route in 2C. A bus gate would be put in place on the Main Street between the Shanganagh Road and Lower Road junctions.
- **Option 2E:** A combination of routes 2A and 2B whereby buses would run parallel to the M11 on a newly constructed bus-way from Wilford junction to the intersection with Crinken Lane, then along the R119 and R837 from Crinken Lane to Loughlinstown roundabout.

The NTA evaluated these options over a number of criteria. On the important of the Environment, Option 2A "a was seen as preferable ***as the loss of immature woodland along the M11 is considered to be less significant when compared to the loss of stone boundary walls, tree lines, hedgerows and mature trees along the Dublin Road. Route Option 2A also required land take from lower amenity land than that required for the other options as it avoids Shankill Village***".

However, Option 2B was selected as the emerging preferred route because ***"Overall 2B was deemed to be the most advantageous route, even though it was not the most advantageous under the Environment criterion. This is due to its comparatively lower cost; significant benefits in terms of integration, accessibility and social inclusion as it serves the catchment of Shankill, integrates with the DART and provides continuous cycle facilities and it would deliver a high level of service for bus passengers. Therefore, 2B was brought forward into the Emerging Preferred Route"***.

Since this decision was taken in 2017, a number of important factors have changed. For example, the proposed route no longer offers *"continuous cycle facilities"*. More importantly, Wicklow County Council is progressing the development of the N11/M11 Bus Priority Interim Scheme (BPIS) in partnership with Dún Laoghaire-Rathdown County Council, Transport Infrastructure Ireland, the National Transport Authority and the Department of Transport. As the website <https://n11m11bpis.ie/> explains ***"The severity of traffic congestion issues on the N11/M11,***

particularly at peak travel times, requires an early intervention to start addressing the problems on the corridor. Accordingly, a project to assess the feasibility of providing bus lanes on the N11/M11 corridor is progressing”.

It is important to note that the N11/M11 BPIS is significantly different from Option 2A as evaluated by the NTA in 2017, although it follows a similar route. Rather than a parallel bus-way, this proposal is for bus lanes on the hard shoulder of the existing motorway/dual carriageway. This means a significantly lower capital cost than Option 2A, as well as even less impact on the environment.

It is clear that the N11/M11 BPIS is intended to facilitate bus services to and from locations south of Bray, new communities to the east of Bray and Park and Ride facilities adjacent to the N11/M11 as well as express bus services to and from Bray.

The existing 145 and 155 routes link Bray and Shankill to the City Centre and beyond with a weekday daytime frequency of 9 buses per hour, each way. Their proposed replacement route, E1, has been indicated as 6 buses per hour, each way, similar to the existing 145. As the current service does not encounter significant delays, passing through Shankill at a pace similar to the proposed 30Kph speed limit, what is benefit is to be derived from the high cost of the current proposal, given its impact on the environment and disruption of the social cohesion of Shankill?

Shankill’s population in 2016 was about 10,000 including approximately 1,000 in areas west of the M11. While a population of 13,000 is often quoted, this includes around 3,000 living in parts of Bray which are in County Dublin, such as Corke Abbey and Old Conna. The population of Shankill will not have changed significantly in the 2022 Census but is expected to increase by about 3,000 when the developments at Woodbrook and Shanganagh Castle are completed. This increase will be served by a new railway station at Woodbrook. Future growth is likely to be focused on areas west of the M11. As a consequence, there is unlikely to be any further major population increase in the area between the M11 and the sea.

Continuing the 145/155/E1 service through Shankill will maintain ***“the significant benefits in terms of integration, accessibility and social inclusion as it serves the catchment of Shankill, integrates with the DART and ... deliver a high level of service for bus passengers”*** without this high cost, environmental impact and social disruption.

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.

Improving the Public Realm

- The NTA seeks to reduce bus journey times and improve facilities for cyclists and pedestrians, with segregated cycle lanes where possible. However, this is not the case in Shankill, where existing cycle lanes will be removed, while walking will be unpleasant and unsafe as bus lanes will immediately adjoin narrow footpaths, creating risks to pedestrians from bus mirrors and draughts from passing buses.
- Where bus stops are not located close to road crossings, it will be difficult and dangerous to cross the four-lane highway in order to catch a bus. Even with signalised crossings, the absence of median islands will render the crossings intimidating particularly for older pedestrians and children.

- Even where there are wider footpaths, walking beside a four-lane highway will not be pleasant, with noise, traffic and diminished air quality. This will be further increased by the removal of oxygen generating trees.
- Having four-lane highways on the approaches to Shankill will reduce the incentive for people to stop, shop and enjoy the village.
- If additional lanes are to be installed, consideration should be given to a maximum of three traffic lanes between Wilford and Loughlinstown Roundabouts, with dedicated bus lanes only at the approach to traffic pinchpoints.
- Proposals for recessed footpaths should be further detailed in the context of the impact on retained trees, isolation of pedestrians and impact on granite walls.
- The proposed significant land take from St. Anne's Church requires an adjustment to the boundary at the approach to the existing roundabout. This will require relocation of a statue and a revised layout to parking in the grounds. This is due to the inclusion of a short cycle lane at this location. This proposed cycle lane will be of limited benefit to long distance cycle traffic due to its intermittent nature. As the Corbawn area is no longer in the catchment area for St. Anne's School, it is also unlikely to be of significant benefit to school traffic.
- While the BusConnects project seeks to upgrade long distance cycle routes to the city centre, these do not have to track existing main roads. In the context of the proposed Dún Laoghaire Rathdown Safe Walking & Cycling Routes, consideration should be given to a route linking Bray to the proposed Park-to-Park route from Blackrock to the coast at Bayview, just north of Shankill. While this may be outside the scope of BusConnects, it provides a viable alternative to routing long-distance cycle traffic through Shankill.
- If the magnificent St. Anne's Roundabout is to be removed, proposals should also be drafted for a new floral welcome to Shankill, possibly in more than one location.
- Changes to the proposals to date have been designed to reduce their negative impact on the public realm, with little or nothing positive added.

Impact on the Community of Shankill

- Shankill is a distinct community bounded by the green belt to the south and the Loughlinstown Roundabout in the north which reinforces the feeling that Shankill is a community in its own right, not just a conglomeration of connecting roads.
- Wider roads will create safety issues for children, elderly and disabled persons.
- There will be significant noise, disruption and dust during the two-year construction phase.
- Dedicated bus lanes also mean dedicated car lanes, probably leading to increased traffic and increased speeding. Ongoing congestion on the nearby M11 could result in increased use of Shankill as a rat-run.
- Many residents of North Shankill are concerned at the implications of a four-lane highway beside their homes, close to the existing four lanes of the M11 motorway, including increased exposure to traffic, noise and pollution.
- The Bus Corridor is therefore likely to have negative impact on the physical and mental wellbeing of residents.

Impact of Revised Traffic Arrangements

- Under the proposals, the roundabouts at St. Anne's and Quinn's Road will be removed. Both of these areas previously had traffic light systems which were removed because of poor performance.

- Similarly, a right-hand turn from Shanganagh Road into Beechfield Road was previously trialled but caused major tail backs to the village and was removed. This will be exacerbated if Beechfield Road is the only entrance to Corbawn, as proposed. Exiting Corbawn Lane is likely to be extremely difficult as there will only be one exit lane onto Shanganagh Road. The Corbawn area includes over 700 residential family homes, a large Garda station, a major shopping centre, a medical centre, a nursing home, two Montessori schools as well as providing alternative access to the DART station and the only emergency access route to areas on Quinn's Road east of the DART line, including the Tennis Club, Bowling Club, allotments, residential houses on Quinn's Lane, beach access and sections of Shanganagh Park east of the DART line.
- A survey by local volunteers indicates that of northbound traffic from Shankill Village, approximately one-third proceeds on to the Dublin Road, one third on to Shanganagh Road and on third goes down Corbawn Lane. Under the current proposals, there will be no access onto Corbawn Lane and this traffic will be forced on to Shanganagh Road and obliged to turn right on to Beechfield Road, where no right turns are currently permitted. This will most likely cause serious congestion at peak times.
- Roadworks on Shanganagh Road, adjacent to the Beechfield Road junction caused major traffic disruption, with tailbacks in northbound traffic as far as Main Street and beyond.
- As this area around Shankill Shopping Centre is extensively used by relatively elderly pedestrians, appropriately located signalised crossings, with median islands, will be essential.
- The proposed arrangements for Corbawn Lane should be further reviewed following consultation with Corbawn residents and other stakeholders, including An Garda Síochána, and evaluation of the risk of blockages at the Corbawn Lane junction.
- In the case of Quinn's Road, the earlier traffic lights were removed as residents had difficulties in gaining access to the main road. While improvements at this junction would be welcomed, proposed changes should be discussed with local residents.
- People driving to the village typically use the roundabouts at either end rather than turning on Main Street in order to return to where they came from. As this would no longer be possible, they would have to perform three-point turns on Main Street, resulting in traffic delays.
- The impact on traffic of the location of bus stops on Main Street has been widely noted, yet the proposals do not recommend any changes. Consideration should be given to moving one of the locations so that they are not as close to each other.
- Suggestions that recessed bus-stops would allow traffic to continue to flow have been rejected by the NTA on the basis of difficulties in buses re-entering the traffic lane. Location of bus stops on either side of the pedestrian crossing and linking the lights to the buses could help resolve such difficulties.
- Where four-lane arrangements are proposed, north and south of Shankill Village, residents are concerned that access to and from estates will be restricted, particularly when turning right. Filter lanes could allay such concerns.
- Further consideration should be given to traffic calming measures, avoidance of rat-runs through Main Street and improved pedestrian and cycling facilities.

Impact on the Environment

- Shankill is an area of outstanding natural beauty which is defined by its location, between the mountains and the sea and by its parks and green spaces, and, in particular, by its trees, which have a long history. A possible origin of the name Shankill, is “Old Wood”. As noted above active tree planting in the area dates back at least to the 18th Century, an early example of planning for the benefit of future generations.
- Having noted Shankill’s wonderful location between the mountains and the sea, it is important to also observe that the coastal strip is actually very narrow, at 2 kilometres wide. As well as the community of Shankill with over 10,000 residents and growing, this narrow strip already has a railway and a motorway. It really is not wide enough to accommodate an additional four-lane highway.
- The route from Loughlinstown Roundabout to Bray forms a wildlife corridor, as it has retained its sylvan nature, with large, mature mixed woodland, hedges and shrubs on both sides.
- In the light of the damning commentary on the Irish environment in the Environmental Protection Agency’s “State of the Environment” report and the deepening understanding of the impact and extent of biodiversity loss, and its impact on humanity, the consequences of the loss of a significant number of trees, many of them mature, should not be underestimated. In particular, it should be noted that there is increasing evidence that loss of mature trees requires replacement by a far larger number of immature trees. The extent of tree loss in Shankill is disguised in the BusConnects proposals by the fact that, in some places, replacement trees are shown on the maps but these will take many years, if not decades, to grow and would not replace the exceptional trees that would be felled.
- Under the BusConnects proposals, it is not clear how many trees are at risk but this figure is likely to be run into many hundreds and there also could be significant root damage to adjoining trees. Many of the trees at risks are mature and include a number of specimen trees. The NTA has stated that most of the trees to be lost in the overall Bus Connects project would be small roadside trees. This is not the case in Shankill where many landmark trees would be lost.
- There would also be encroachment into green areas with resultant impact on flora and fauna. In particular, the area’s relatively rural aspect would put a large amount of hedgerow at risk. Estimates are that over half of the proposed route is bounded by hedgerows.
- In South Shankill, most of the very large and mature trees from Shanganagh Park onwards, along both sides of the road, would be lost.
- In North Shankill, land take along the right-hand side of the road from Loughlinstown to Stonebridge Road would mean the loss of several significant trees from private gardens. A section of the woodland between the M11 and R837 would also be felled, with over 100 trees and considerable shrubs and hedgerow in this area alone. This would considerably reduce the visual barrier between the two roads and would expose residents to the noise and pollution of 8 lanes of traffic. The area enjoys the presence of hedgehogs, foxes, squirrels, frogs, bees and other insects, as well as a large variety of birds as this woodland which is untouched by humans and is rich in biodiversity.
- The proposed four-lane highways in both North and South Shankill will create barriers to wildlife corridors, necessitating appropriate wildlife access routes, such as tunnels or bridges, in these locations.
- DLR’s Tree Strategy 2023 -2030 ***“brings clear focus to the role of trees and the urban forest in our County. Trees play a significant role in climate action, mitigation, adaption and***

biodiversity... The role of trees as carbon sequesters and other tree benefits relating to Climate mitigation, air quality and health and wellbeing". Replies to questions when debating the strategy included comments such as **"It is our policy to manage and retain healthy trees which were planted historically in residential verges and are now mature. These trees, due to their maturity, provide many important benefits such as carbon sequestration, mitigation of air pollution, noise abatement, habitat for wildlife to name a few"; "Where they cause severe obstruction, legal nuisance and where a severe problem relating to the tree involving damage to infrastructure or severe obstruction of streetlights that cannot be managed by pruning or other means, only then will removal be considered an option" and "It is extremely difficult to get new trees established in the urban environment with the increasingly dry summers, hostile ground conditions, competition with services in the street and vandalism and these existing trees are a valuable amenity and need to be retained with appropriate management".**

- During Covid-19, access to green space and nature has been critical to the community. It is ironic that the NTA is proposing to remove so many trees and reduce public space for citizens at a time when more people recognise the value of nature, of biodiversity and the mitigating effects that trees have on climate change.
- The proposals should be evaluated for compliance with environmental regulations, including a specific review of the environmental impact on the Shankill area.

Conclusion

In the first round of the consultation process, 1,118 submissions were made to the NTA by the Shankill community. This was a huge proportion in comparison with the entirety of the remainder of Bray to City Centre Core Bus Corridor and reflected the high level of concern within the community. Over 3,300 signatures were secured on an online petition protesting the proposals.

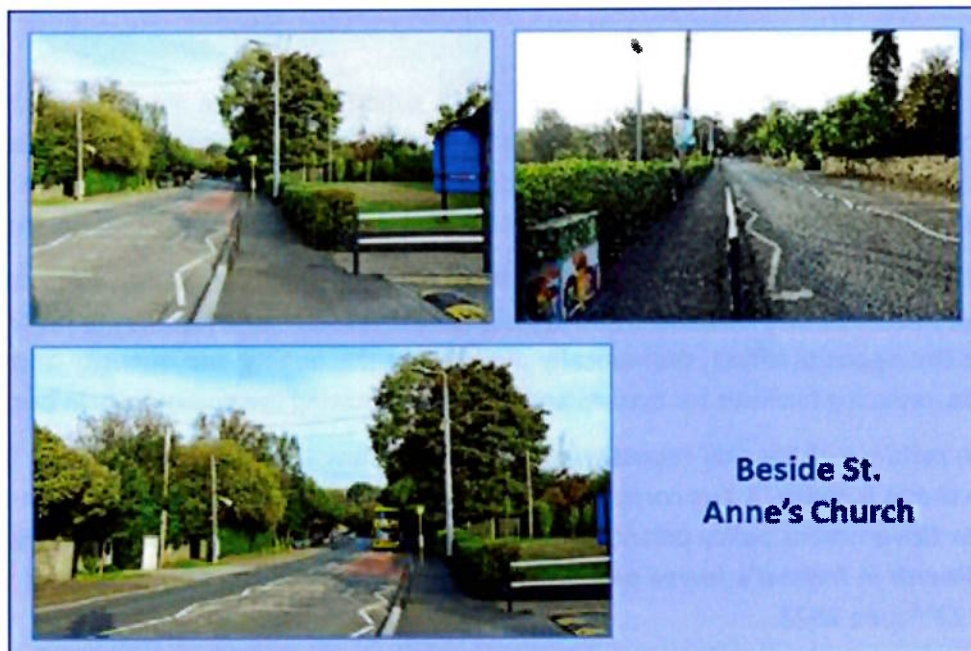
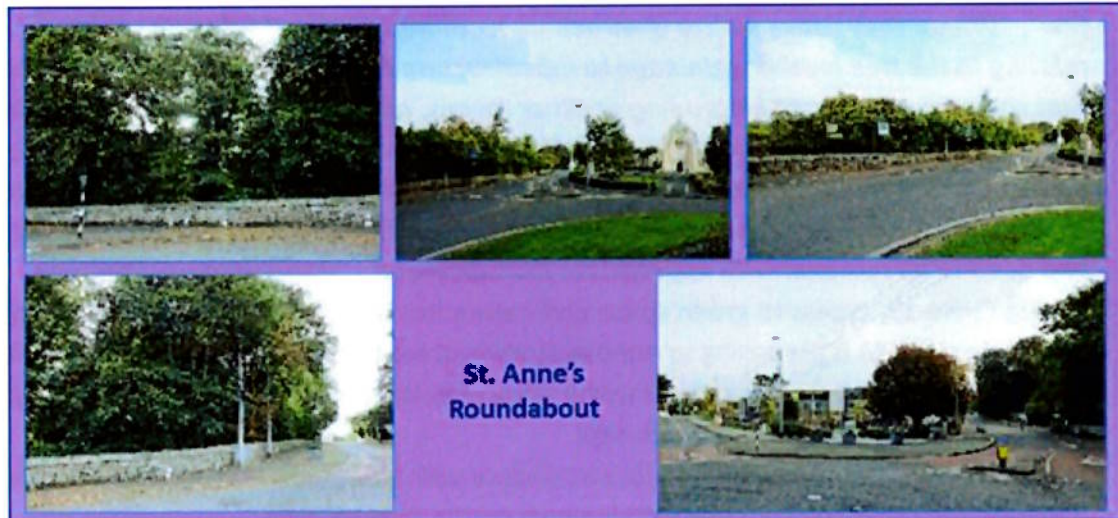
Since Covid-19, several villages which, like Shankill, were bypassed decades ago, have cordoned off areas to improve space for pedestrians and cyclists. Creating a four-lane highway in the Shankill area would have the opposite effect, dramatically diminishing the quality and quantity of public space for residents, reducing facilities for cyclists and effectively cutting the community in two.

A long-term resident of Shankill recently commented on how the M11 bypass made Shankill the community that it is today, A bus corridor through Shankill will undo the benefits of the bypass, at a time when Government policy prioritises **"major projects which provide for local bypasses and Compact Growth in Ireland's towns and villages"** quoting the Minister for Transport speaking in the Dáil on 22nd June 2023.

Shankill has just been awarded its second successive gold medal in the 2023 SuperValu Tidy Towns. The adjudicator's report included the comment: **"The approach roads to Shankill village looked well on adjudication day with the approach to the urban village centre from the Shanganagh Road standing out with its eye-catching entrance signage and expertly planted roundabout. The natural stone walls and colourful planters on this approach also help to create a positive first impression for visitors... A major strength of your urban village is considered to be its permeability with pedestrian and cyclist access possible to the main village from the surrounding area and a pedestrian pathway to the railway station. This is a particularly important feature as it can have a positive influence on transport user choices as more can be expected to choose active and public transport options when permeability is good".**

The BusConnects proposals for Shankill do not reflect a deep understanding of the locality. We therefore request that an oral hearing be held so that all concerned can better understand the beauty and charm of Shankill that is being placed at risk.

Please do not destroy our unique and charming community.





**St. Anne's
Roundabout**



**Eucalyptus tree near the
Stonebridge Road Junction**



**Between Stonebridge Road
Junction and
Loughlinstown
Roundabout**



