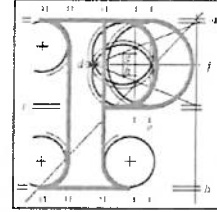


Our Case Number: ABP-317742-23

Planning Authority Reference Number:

Your Reference: Aeval Unlimited Company



**An
Bord
Pleanála**

Castlethorn and Chartered Land Group
Usher House
Main Street
Dundrum
Dublin 14
D14 N7Y8

Date: 13 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,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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

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

AN BORD PLEANÁLA	
LDG-	<u>067606-23</u>
ABP-	<u>317742-23</u>
10 OCT 2023	
Fee: €	<u> </u> Type: <u> </u>
Time:	<u>16.25pm</u> By: <u>Hand</u>

An Bord Pleanála (Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1.
D01 V902

10th October 2023

Re: BRAY TO CITY CENTRE CORE BUS CORRIDOR SCHEME AND COMPULSORY PURCHASE ORDER 2023

Castlethorn and Chartered Land Group Submission on behalf of Aeval Unlimited Company with respect to proposed Permanent and Temporary Acquisition of Lands at Woodbrook, Shankill being Plot Ref. No. 1066(1).1h, 1066(2).2h

Dear Sir/Madam,

We write with respect to the Bray to City Centre Core Bus Corridor Scheme and the associated application for confirmation of the Bray to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2023 (CPO) as it affects our lands at Woodbrook along the Old Dublin Road in Shankill, Co. Dublin. Aeval Unlimited Company is the owner of the affected lands and I wish to confirm that Aeval is an associated company of the Castlethorn and Chartered Land Group and this submission is being made for and on behalf of Aeval Unlimited Company.

We are supportive of the Bray to City Centre Core Bus Corridor Scheme in principle but have two key concerns with respect to the works as proposed along the interface between this BusConnects (as commonly referred to) corridor and our Woodbrook lands. These concerns comprise firstly, of the impact of the proposed works and permanent land acquisition on the mature trees and extent of green buffer that exist along the front of our site and secondly, to the potential impact of the temporary land acquisition on permitted and currently under construction houses and duplexes that front onto the Old Dublin Road at Woodbrook.

We wish to confirm that we have made submissions at each stage of the public consultation process raising these concerns, but they have not been adequately addressed by the NTA and their project design team.

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1. Impact of the Proposed Works and Permanent Land Acquisition on the Mature Trees along the front of the Woodbrook Lands at Old Dublin Road

We have made submissions with respect to our Woodbrook lands at each stage of the BusConnects public consultation process noting that we have secured an SHD planning permission for 682 no. residential dwellings at the subject Woodbrook site (An Bord Pleanála Ref. ABP-305844-19). This is known as Woodbrook Phase 1 and it is very well progressed on site with circa 120 no. new homes sold at this stage and first occupations expected by the end of October 2023. It will ultimately accommodate some 1,400 new homes, a local centre, new primary school and a new Woodbrook DART Station.

The vehicular entrance to Woodbrook and its interface with the Old Dublin Road has been constructed in accordance with the above referenced permission. It was constructed with the footpath and southbound cyclepath diverging from the Old Dublin Road carriageway and accommodated within our site in order to retain as many of the existing mature trees along our site frontage with the Old Dublin Road as possible. A number of options were presented to An Bord Pleanála as part of our aforementioned SHD application, including the most up to date NTA drawing for BusConnects at that time, which is very similar to that which is still currently proposed and would similarly involve the loss of all the mature trees along the front of the Woodbrook site.

Our proposed entrance arrangement, as detailed in the Site Layout Plan and all supporting architectural, engineering and landscaping drawings was referred to as Option 1 in the Traffic and Transport Assessment prepared by Atkins Consulting Engineers and submitted as part of our SHD application (see Fig 1 below comprising of an extract from the TTA).

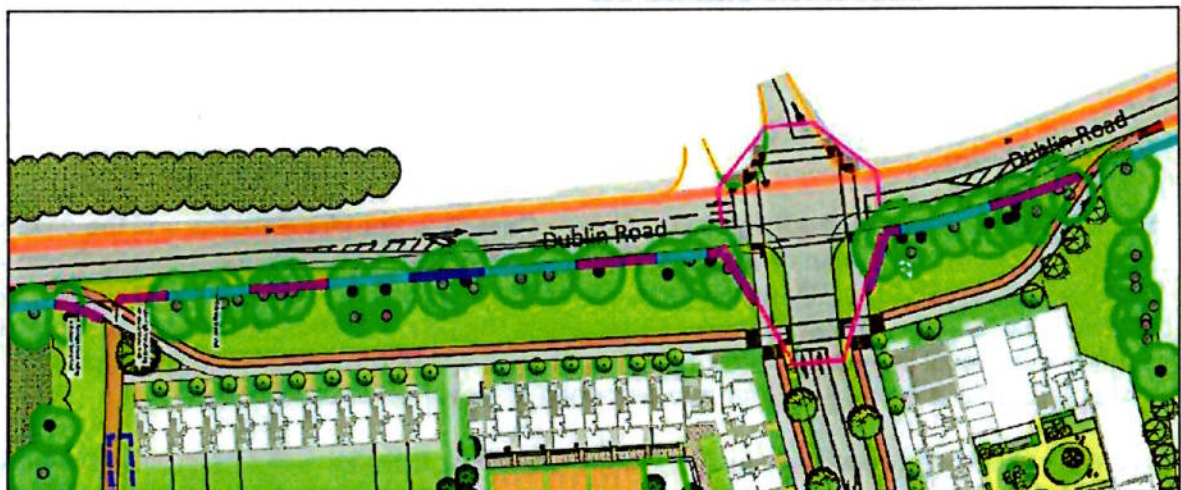


FIG 1: Option 1 Layout for Woodbrook entrance

A version of this layout maintaining that right-turning lane into the site but accommodating the southbound cyclepath and footpath along the eastern edge of the expanded road carriageway was drawn up and referred to as Option 2 in the aforementioned TTA document. This would necessitate the removal of most of the mature trees and the majority of the existing stone boundary wall along the front of the Woodbrook site (see Fig 2 below comprising of an extract from the TTA).

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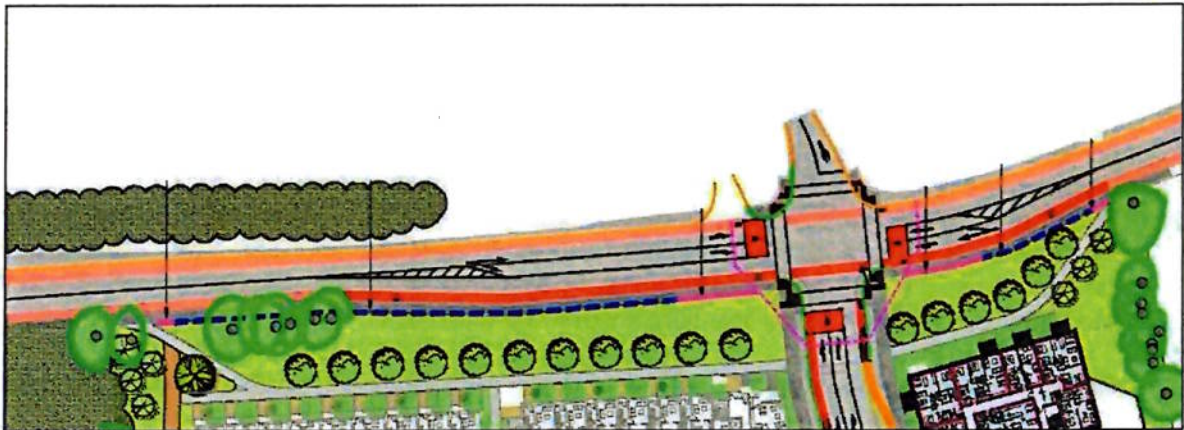


FIG 2: Option 2 Layout for Woodbrook entrance

Finally, a version of the NTA BusConnects section design as presented under public consultation was drawn up as it would interface with Woodbrook to show the implications of that proposal and to demonstrate that such a worst-case landtake scenario could be accommodated, if considered appropriate. This was referred to as Option 3 and would necessitate the removal of all the mature trees along the front of Woodbrook and the full extent of the existing stone boundary wall (see Fig 3 below comprising of an extract from the TTA).

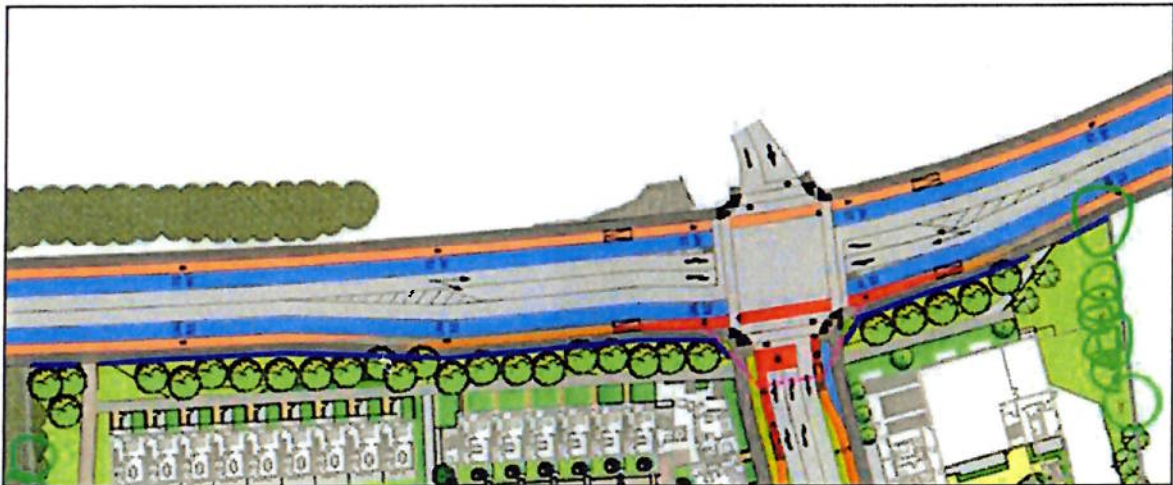


FIG 3: Option 3 Layout for Woodbrook entrance

We invited An Bord Pleanála to determine the most appropriate entrance and interface arrangement with the Old Dublin Road noting our preference for Option 1. Condition No. 8 of our SHD permission (Ref. ABP-305844-19) deals with this matter, requiring as follows:

8. *The proposed new road junction layout on the Old Dublin Road to serve the proposed development shall comprise of Option 1, as submitted with this application. Any future changes to the access road junction and boundary arrangements shall be the subject of a further planning application to the local authority.*

Reason: In the interest of road safety

We constructed the Woodbrook entrance and interface with the Old Dublin Road in accordance with our Phase 1 planning permission. This enabled retention of most of the

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mature trees along the front of the site and retention of much of the stone boundary wall. We note that it is an objective also of the Woodbrook-Shanganagh Local Area Plan to retain this wall and mature trees and we would submit that the existing as-built section through the Old Dublin Road at Woodbrook is adequate and appropriate and should be retained to protect these significant built and natural heritage features. If however the accommodation of dedicated northbound and southbound bus lanes along this short stretch of the Old Dublin Road under BusConnects is considered essential, then that would necessitate the loss of these mature trees and the removal of the existing stone boundary wall. This would be regrettable and would undoubtedly impact negatively on the established sylvan character of the Old Dublin Road and on the Woodbrook development.

We attach below an overlay of the BusConnects proposed land acquisition plan (from March '23) on our permitted Woodbrook interface with the Old Dublin Road.

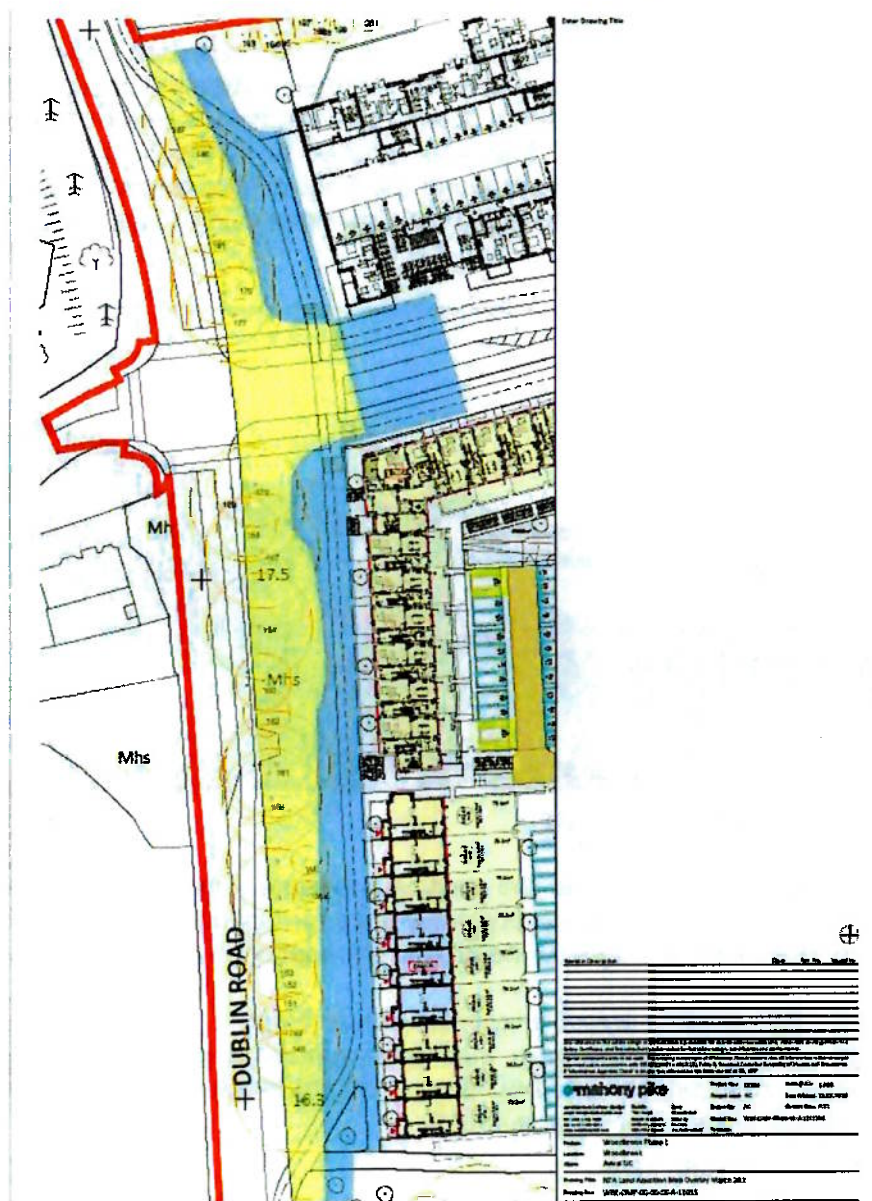


FIG 4: Overlay of Permitted Woodbrook Scheme with Proposed Permanent & Temporary Land Acquisition Plans as received from the NTA in March 2023.

The extent of permanent and temporary land acquisition as indicated in the above plan based on hard copy, coloured plans (beige representing permanent landtake and blue representing temporary landtake) sent to us in March appears consistent with the Compulsory Purchase Order communication and accompanying plans as sent to us on 10th August 2023. We have concerns about the overlap of the proposed temporary acquisition on the footpath and private curtilage of houses and duplexes along that Old Dublin Road frontage and communicated those concerns to the BusConnects project team back in March and we will elaborate on those concerns in the next Section of this submission.

We have concerns as noted with the BusConnects currently proposed design and its potential impact on the established sylvan character and existing entrance at Woodbrook and the residential amenity of those houses and duplexes that front onto the Old Dublin Road. We would respectfully submit that the footpath and southbound cyclepath along the eastern side of the upgraded Old Dublin Road should be retained in any event at that existing, recently constructed new alignment along the front of the Woodbrook site thereby reducing the continuous corridor width of the widened Old Dublin Road and avoiding the duplication of such pedestrian and cycle facilities so close to these permitted facilities as constructed on-site. The eastern extent of the BusConnects widened corridor, if dedicated bus lanes at this location are deemed essential, would thus be the southbound bus lane and bus stop with a pathway connection east from the bus stop to the adjacent footpath and cyclepath as existing at Woodbrook.

This slightly amended proposal, still accommodating dedicated bus lanes, would facilitate a wider 'green corridor' and buffer between the expanded Old Dublin Road and the adjacent Woodbrook development that would facilitate more meaningful landscape screening between this upgraded road corridor and adjacent residential development. We would further request that it be conditioned that the existing stone wall should be salvaged and rebuilt as appropriate along the eastern edge of the BusConnects works i.e. the eastern edge of the southbound bus lane with the necessary breakout to accommodate the planned bus stop and a pedestrian pathway east to connect to the existing pathway and southbound cyclepath as constructed within the Woodbrook scheme.

Finally, we would respectfully request that it be conditioned that a significant number of semi-mature trees be planted within this widened 'green corridor' along its western edge to provide some meaningful natural screening between Woodbrook and the Old Dublin Road. This would be important to protect the residential amenity of adjacent dwellings and to try to compensate for the loss of existing mature trees along this section of the Old Dublin Road if they cannot be retained. This would go some way to re-establishing the sylvan character at the entrance to Woodbrook and maintaining that continuous, well-established, and attractive natural sylvan character along the Old Dublin Road.

It is submitted that much more significant planting of larger, semi-mature, trees and within a wider 'green corridor' as suggested above would be warranted as appropriate mitigation to the expanded road corridor and felling of mature trees where necessary along the BusConnects interface with the Woodbrook development. We would note that the permitted and under construction residential development at Woodbrook is not indicated on the Landscaping Design Sheet 48 of 54, from Volume 3 of the EIAR – 'Landscaping General Arrangement', carried out with respect to the proposed BusConnects scheme, an extract of which is provided in Fig 5 below.

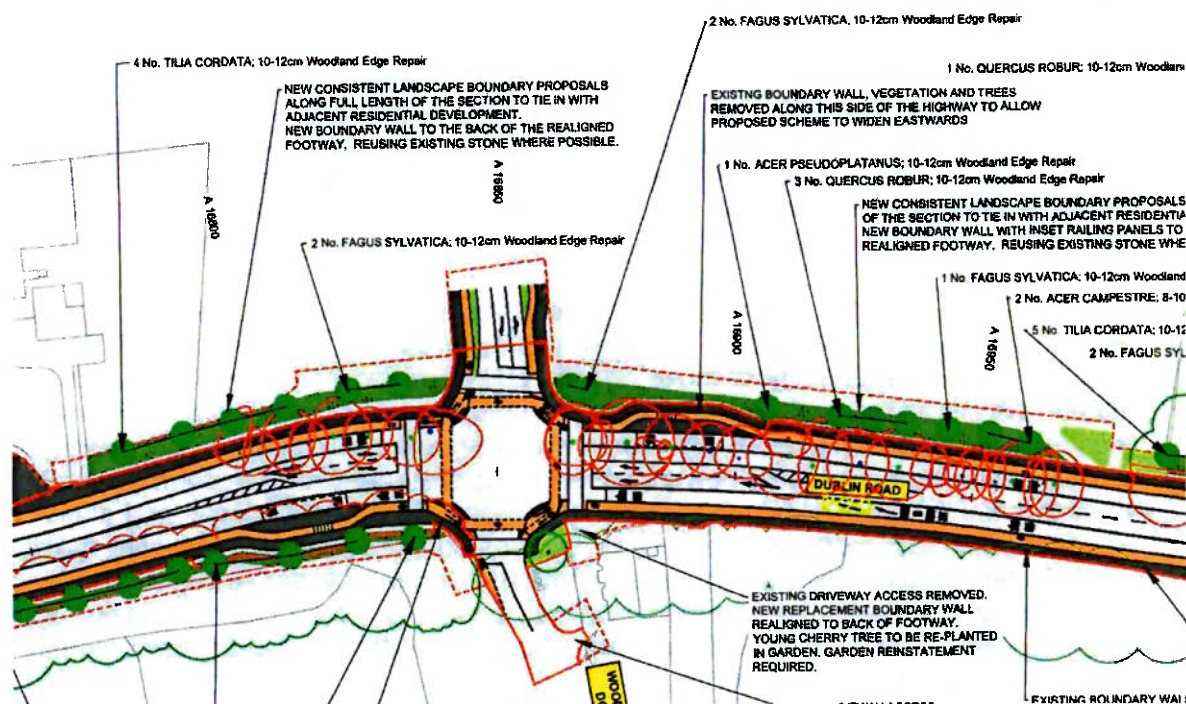


FIG 5: Extract from Landscaping Design Sheet 48 of 54

We are not reassured by the indicative hedge planting and intermittent tree planting suggested in that proposed Landscaping Plan and would respectfully request a widened 'green corridor' to serve as a more significant landscape buffer and a more intensively planted row of native new semi-mature trees of more significant girth to compensate for the very significant impact that the BusConnects works could have on the character and residential amenity of Woodbrook and on the otherwise continuous sylvan character of the Old Dublin Road.

2. Potential Impact of the Proposed Temporary Land Acquisition on the Permitted and Under Construction Houses and Duplexes fronting onto the Old Dublin Road

We have raised concerns previously as to the extent of encroachment of the temporary land acquisition area on the western frontage of the permitted houses and duplexes under construction at Woodbrook along the edge of the Old Dublin Road. We note that the Applicant has not provided an overlay of the proposed permanent and temporary land acquisition with the adjacent permitted Woodbrook development. We furnished the BusConnects project design team (Ms. R. Sharma from Jacobs Engineering) in May 2023 with CAD layouts of our permitted Woodbrook scheme, and this adjacent development context should be indicated on a version of the land acquisition drawings and on all EIAR drawings of this area to allow the necessary consideration of this immediately adjacent built context.

We have been assured in previous correspondence that the temporary land acquisition would not encroach on the private front curtilage of any apartments, duplexes or houses along the western edge of the Woodbrook site but that the temporary land acquisition would extend to the back of footpath, adjoining those private curtilages. That is inappropriate and unacceptable as these own door duplexes and houses will depend on that existing footpath

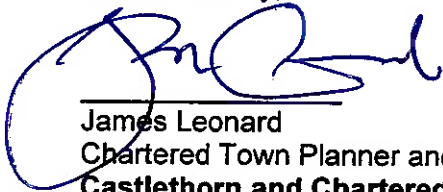
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to get to the front door of these dwellings. One can see by reference to Fig 4 above that the blue infill area (extent of proposed temporary land acquisition) extends across the full extent of that existing footpath and adjoining cyclepath, which we submit should be retained and utilised to avoid duplication of pedestrian and southbound cycle facilities along the eastern edge of the expanded Old Dublin Road corridor.

These two terraces of houses and duplexes will be completed and occupied prior to any Bus Connects works being carried out at this location. They are served by car parking courts to the rear. That existing footpath will be the only means of access to the front door of these dwellings and thus any hoarding or Harris fencing associated with Bus Connects works must be set back from the western edge of this footpath. We submit that it should be set back just beyond the western edge of that existing cyclepath in order to facilitate its continued usage whilst works are being carried within the Old Dublin Road corridor and adjacent green corridor along the front of the Woodbrook development.

We trust that due consideration will be given to the points made in this submission. We would very much welcome the opportunity to attend the oral hearing on this project if indeed one is held, and we would be happy naturally to furnish any additional information or respond to any queries as may arise as appropriate.

Yours faithfully,



James Leonard
Chartered Town Planner and Project Manager
Castlethorn and Chartered Land Group
For and on behalf of Aeval Unlimited Company