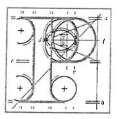


Our Case Number: ABP-317742-23



An Bord Pleanála

Aoife Sweeney 167 Castle Farm Shankill

D18 C439

Date: 12 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 Glao Áitiúil

Glao Altiuil Facs Láithreán Gréasáin Ríomhphost Tel LoCall Fax

Email

Website

(01) 858 8100 1890 275 175 (01) 872 2684 www.pleanala.ie bord@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902

64 Marlborough Street Dublin 1 D01 V902 Aoife Sweeney,
167 Castle Farm,
Shankill,
Dublin,
D18 C439.

Observation on Strategic Infrastructure Development

Bus Connects - Bray Bus Corridor

Devastating Impacts on Shankill Village.

Grounds for Observation

The basis for this observation is on the devastating impact the current proposals from Bus Connects on the community and the natural and built environment of **Shankill**. The proposals will essentially put a dual carriage way through the heart of a residential community and will transform the area irrevocably for no discernible gain to the local or wider community.

The proposed benefits as set out in the bus connects proposals for the area are unwarranted and unfounded. Currently Shankill is well serviced by public transport with an excellent bus service with buses typically passing through Shankill without significant delay. Shankill also has a dart station and will soon have a second dart station within its environs. The area is a low traffic corridor so is not appropriate for this type of infrastructural development. Therefore the rational for introducing of a bus corridor from Wilford Junction to Loughlinstown Roundabout is not warranted. There are alternative options which are more viable from a transport policy and environment protection perspective.

The environmental impact of the bus corridor cannot be underestimated with the removal of over **400 mature trees**, hedgerows and precious habitats for wildlife in the increasing urbanisation of Shankill. The plan is in direct contravention of DLR's Biodiversity Action Plan and the proposed Tree Strategy. The tree lined road provides a buffer from noise and pollution from the M11 which runs close by to the village of Shankill. The removal of such a large quantity of mature trees will have a devastating impact on the nature and social environment of Shankill and will directly impact on greenhouse gas emissions in the area.

The proposals for the removal of the 155 bus route from Shankill means that in fact there will be a reduction in bus service for the village. In additional the minimal reduction in travel time from Bray to Finglas, (estimated to be between 5-8mins end to end) calls into question the viability from a transport policy perspective of the proposals.

The current proposals are not evidenced based, hugely costly and will not delivery a return on investment for the National Transport Authority or for the Government.

In summary the proposals will:

- 1. Destroy the natural environment of Shankill and Bray with the removal of over 400 mature tress and hedgerows
- 2. Destroy the historic build environment of the area with the removal of historic stone walls

- 3. Close off key access route to Corbawn Lane
- 4. Create traffic tailbacks and congestion by replacing roundabouts with traffic lights
- 5. Increase risk of serious road traffic accidents
- 6. Endanger pedestrians and cyclists
- 7. Irrevocably change the social, economic and environmental fabric of Shankill

All this just to deliver a marginal reduction in travel time in the bus route end to end.

The proposals do not make sense from an environmental, social, sustainability or transport policy perspective and need to be reconsidered.

The are alternatives that have been proposed by Shankill Community Action and other local stakeholders. The alternative solution to put bus lanes on both carriageways on the M11/N11 will ensure that the objectives of the bus connects are achieved in a more cost effective and sustainable way. It will also ensure the preservation of the natural and build environment of Shankill for its community.

In summary:

- The main bray to city centre core bus corridor should follow the N11 between Wilford junction and Loughlinstown roundabout, using the proposed N11/M11 Bus Priority Interim Scheme.
- Express services to and from Bray, together with buses servicing Greystones, proposed development at Fassaroe and Old Conna, along with park and ride facilities on the N11 should also use this corridor.
- Shankill's excellent bus service should be maintained with only buses serving Shankill and Bray going through Shankill village. The 145, 155 and 45A routes, and there proposed successor routes E1 and 211, should continue though 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 in consultation and agreement with the local community.

The community of Shankill will welcome the opportunity to express our views at the oral hearing as part of this public consultation process. There are alternative proposals that achieve the objectives of the Strategic Infrastructure Development as articulated in the Bus Connects plan that are more environmentally sustainable, proportionate and economically sound which respects the social, economic and environmental fabric of our community.

[End]