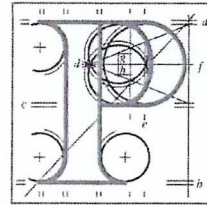


**Our Case Number:** ABP-317742-23



**An  
Bord  
Pleanála**

Carol Scott  
4 Seaview Park  
Shankhill  
Dublin 18

**Date:** 10 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 observation or submission in relation to the case mentioned above 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 be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

*PP Klaudia Wiercicka*

Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

BL50A

**Teil** **Tel** (01) 858 8100  
**Glaó Áitiúil** **LoCall** 1800 275 175  
**Facs** **Fax** (01) 872 2684  
**Láithreán Gréasáin** **Website** [www.pleanala.ie](http://www.pleanala.ie)  
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64 Sráid Maoilbhríde 64 Marlborough Street  
Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902

**AN BORD PLEANALA**  
LDG: 067189-23  
AGP: 317742-23  
**06 OCT 2023**  
Fee: € \_\_\_\_\_ Type: \_\_\_\_\_  
Time: \_\_\_\_\_ By: \_\_\_\_\_

4 Seaview Park  
Shankill  
Dublin 18

6<sup>th</sup> October 2023

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

**LOUGHLINSTOWN ROUNDABOUT TO WILFORD JUNCTION SECTION OF  
BRAY TO CITY CENTRE - BUS ROUTE 13**

Dear Members of An Bord Pleanála,

I am a long-term resident of Shankill and was a member of the initial Shankill Bus Connects Contact Group which met with the NTA in 2019 and 2020. I am now also part of a new Shankill cross community group which represents local residents, neighbourhood organisations, businesses and public representatives, and other established community groups, including Shankill Action for a Greener Earth and Shankill Tidy Towns. As well as this, my own personal submission, we are making collective submissions. These include the comprehensive report from Professor Austin Smyth, Professor Emeritus of Transport, University of Hertfordshire and Expert Transport Economics and Planning Advisor to Department for Infrastructure (NI).

While supporting the Bus Connects project in principle I believe it to be hugely detrimental in Shankill and do not believe that it would deliver any improvement to bus travel from Bray to the City Centre, despite the vast amount of money that would be spent on it. It would be environmentally and socially disastrous for a beautiful sylvan village which is uniquely located in a narrow 2km strip of land between the curve of the bay from Dalkey Island to Bray Head on the east, and the Dublin and Wicklow Mountains to the west and south. The economy and heartbeat of the village would be critically damaged.

The land-take on Route 13 is greatest in Shankill as is the loss of mature trees. It is the greatest tree loss on all the Dublin routes. These are sizeable, interconnected trees and are intrinsic to the landscape of the village. Many are landmark. From our count, we believe a conservative minimum of nearly 500 hundred trees would be destroyed, more than the figure given by the NTA for the entirety of Route 13. We would also lose the mixed hedgerow that extends throughout the village, along with the historic granite walls which are a unique feature of Shankill. This would have a devastating impact on the biodiversity of the area at a time when the Environmental Protection Agency has said that Ireland is failing abysmally in protecting the environment and biodiversity. It would also call into question claims that Bus Connects is tackling climate change.



I believe that the NTA sees Shankill as just a route, which is divided into three separate areas, north, south and village centre. Residents see one united cohesive community which has been strengthened by the bypassing of the village nearly 40 years ago. People volunteer and the village has won many awards in the Tidy Towns Competition, in 2022 we won gold. It has today been confirmed that we have again won Gold for 2023. This is down to the dedication of Shankill residents who value their beautiful village. All this is now in jeopardy. A bus corridor through Shankill would undo the benefit of the bypass and the significant investment in the village at that time. This flies in the face of Government policy which prioritises "major projects which provide for local bypasses and compact growth in Ireland's towns and villages".

I sincerely ask that An Bord Pleanála does not allow the vast volume of material that the NTA has supplied to confuse the decision making process. I find the format used quite opaque as information is given for the whole route rather than for individual areas.

I urge you to examine and question every aspect of the plan. Is the inclusion of Shankill more to do with linking Bray to the route? If so, would it not make practical, economic and environmental sense to use the proposed N11/M11 Bus Priority Interim Scheme? This could be achieved more rapidly and at significantly reduced costs compared to the current proposals. Limited improvements could be made in Shankill to improve traffic flows, enhance the public realm, promote safe active travel and improve the cycling network, while maintaining the current excellent bus service. This would avoid the huge level of destruction that is currently planned.

In order to arrive at a balanced and informed decision, it is vital that you walk the course. It is not possible to make an assessment remotely and would not be appropriate for a project of this size and scale. This would need to be done when the trees and hedges are in full leaf, not in the winter time. Google Maps Street views over recent years will assist to a certain extent. The photos I am attaching as Appendix 4 will also help to show some of the trees that are under threat. I am also enclosing a further album of more trees at risk and those that are remaining. All these photos form an integral part of my submission.

However, it is only by seeing the beauty of Shankill with your own eyes that you will be able to appreciate how special it is and why it should be saved.

If An Bord Pleanála does not agree to an Oral Hearing for Route 13, I will be calling for a Judicial Review.

I enclose my cheque for €50.

Yours sincerely,

A handwritten signature in cursive script that reads "Carol Scott". The signature is written in black ink and is positioned above the printed name.

Carol Scott



## **FACTS**

### **Bus Connects in Shankill:-**

1. Does NOT deliver continuous Bus Lanes.
2. Does NOT deliver continuous Cycle Lanes.
3. Does NOT improve conditions for pedestrians – it makes them far worse and dangerous.
4. Does NOT improve the public realm. It c'estroys a unique village and community.
5. Does not give journey time reliability.
6. Does deliver fewer buses – how can this be seen as improving the service?
7. Is a confused mix of eight different cross-sections and treatments.
8. Is the longest corridor with unique problems relating to distance resulting from the inclusion of Shankill.
9. Means the greatest land-take on any route.
10. Means the highest loss of mature trees on any route.
11. Means great environmental damage and threatens the rich biodiversity of the village which includes, among others, protected species of bats, black-headed gulls, herring gulls and common lizard.
12. Contravenes DLR's Biodiversity Action Plan and proposed Tree Strategy.
13. Goes against action on climate change.
14. Defies the Aarhus Convention. The community was not consulted in any way prior to a route being selected and no choice of route was given.
15. Dismisses Route 2A, which followed the path of the N11/M11, at a very early stage although it was preferable under many headings.
16. Dismisses calls to review the decision (despite requests to do so at public forums and in submissions made by residents).
17. Does not revisit the route choice despite the material change resulting from the current plans to create a bus corridor along the N11/M11.
18. Is contrary to the DMURS rules for urban roads, effectively creating a motorway through the village but without any central medians.
19. Reduces accessibility to homes and amenities.
20. Creates dedicated general traffic lanes.
21. Re-introduces traffic solutions which failed badly previously.
22. Adds six additional traffic lights, slowing traffic.
23. Does not indicate precise locations where time savings would be achieved.
24. Contravenes the decision of DLRCoCo to preserve and protect the roundabouts at St. Anne's Church and Quinn's Road in their Development Plan 2016 to 2022. These are less than 7.5metres and have a low pedestrian footfall so there is no basis in safety for removing them.
25. Is using four year old data - data that has been challenged under Data Protection. The 45A bus route to Dun Laoghaire is not even listed.
26. Gives no consideration to home working following Covid.
27. Gives no consideration to linking commuters with the DART service or Luas at Bride's Glen, both of which guarantee journey times. Work on a second DART station in Woodbrook starts in Q1, 2024.



## **PART 1 - IMPORTANCE FOR FUTURE PLANNING/SUSTAINABLE DEVELOPMENT**

### **PART 1A - CONCENTRATION OF INFRASTRUCTURE IN SHANKILL**

An Bord Pleanála should take into account the existing concentration of transport infrastructure in the small village of Shankill:-

#### **Second Proposed Bus Corridor**

When Bus Connects Corridor 13 was first designed, a number of potential routes were suggested for the section from Loughlinstown Roundabout to Wilford Roundabout. One of these was Route 2A which followed a path adjoining the N11/M11. This was dismissed by the NTA although it offered the best journey time reliability and had significant environmental benefits.

This route will now be utilised for a Bus Corridor planned by TII, Wicklow Country Council, DLRCoCo, the NTA and the Department of Transport, and it will run in both directions south of Loughlinstown Roundabout. In other words, should Corridor 13 go ahead, there would be not one but two bus corridors running through and alongside Shankill 24 hours a day, making six lanes of traffic on the M11 and four on the R837, culminating in ten lanes of traffic at Loughlinstown Roundabout. This is unacceptable in a small village that was bypassed decades ago. The second N11/M11 bus corridor represents a material change and calls into question the need for a corridor through Shankill.

For our household and others living near Loughlinstown Roundabout and beside the roads in question, being faced with two corridors is of deep concern. Clearly there would be significant noise, light, and air pollution, particularly as the NTA are proposing to fell approximately 5 metres of the protective woodland which was planted beside the R837 as a condition of the building of the M11. The NTA acknowledges the high level of noise that some areas of Shankill are already enduring.

#### **New DART Station at Woodbrook**

Work is continuing on upgrading the DART line and work on building a new station in Woodbrook will begin in Quarter 1, 2024. This is in addition to the original Shankill DART station.

#### **Luas Line at Cherrywood**

The Brides Glen, Cherrywood Luas line is within close distance of Shankill.



## **PART 1B - BUS CONNECTS – A FLAWED PLAN**

The NTA refers to Corridor 13 by saying 'Currently this corridor is characterised by traffic congestion along certain sections, and bus lanes and cycling infrastructure are only provided intermittently'. There is no indication as to what areas are being discussed. Shankill currently has an excellent bus service and there are few delays. Residents do not believe that the proposed plan will deliver significant time savings, if any. Due to constraints in Shankill, Bus lanes and cycling infrastructure would continue to be provided intermittently. In some cases existing cycle lanes would be removed. Buses would have to compete for space with general traffic for much of the route and would be dependent on priority signalling for over 1.3km through the core village. This has only ever been shown to work for short distances.

Only in south Shankill is the full Bus Connects template feasible but this does not make sense. Merging two bus lanes, two general traffic lanes and two cycle lanes into a narrow funnel through the village would be dangerous and would give rise to delays and possible conflict. DMURS states that wider roads encourage faster car speeds. This would be exacerbated where there are designated general traffic lanes.

Non-existent or non-continuous cycle lanes in Shankill would not meet the needs of long-distance cyclists. Cyclists would have to share bus lanes in some cases, this is clearly not ideal for either party.

Likewise facilities for pedestrians would dis-improve. Instead of walking on a footpath beside a leafy two lane local road, pedestrians would be walking beside a four-lane carriageway. This would be noisy, hazardous and unpleasant, particularly for children and the elderly. It would make it difficult to cross the road to neighbours, to access Shanganagh Park or even to catch a bus.

Many of the traffic management suggestions proposed by the NTA have previously been trialled in Shankill. These included the use of traffic lights at St. Anne's Church and at Quinn's Road, a right turn from Shanganagh Road to Beechfield Road and the partial closure of Corbawn Lane. All generated delays and were scrapped. This has been repeatedly pointed out to the NTA but has been ignored.

Corbawn Lane serves over 700 houses, a large Lidl with its delivery trucks, a Costa café, a crèche, a pharmacy, a large Garda Station, a medical centre, a nursing home, two Montessori schools. It provides access to the beach and sea, and it also provides alternative access to the DART station. Corbawn is also 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, and sections of Shanganagh Park east of the DART line.



The two roundabouts in the village provide an attractive marker at either end of the central shopping area. Four approach roads have successfully been managed by the roundabout at St. Anne's Church for decades. These roundabouts are also used by locals visiting the village for return trips. Without them, it is likely that people will attempt u-turns, thus delaying buses. Adding several new traffic lights would slow buses where currently travel is unimpeded.

The NTA has said from the start that Route 2B, the chosen Route, was far from optimum, with journey time savings less reliable on this route than on their proposed Route 2A. See Appendix 1 for extracts from the Original Background Research carried out by the NTA when considering possible routes through Shankill.

The Bray to City Centre Bus Corridor would be by far the longest of the proposed Dublin corridors. The perceived wisdom is that the longer the bus route, the fuller buses would be, the more stops there would be along the way and the slower journey times would become. In other words, the positive impact of Route 13 would be diminished by including the Shankill to Bray section, particularly given the constraints previously indicated and the narrower cross-sections involved.

The traffic implications are fully outlined in Professor Smyth's report.

## **PART 1C - THE CONSULTATION PROCESS**

In the first round of public consultation in May 2019, the NTA received 1118 submissions for the Shankill section. This compared with 70 in total for the remainder of Route 13. At the time there were 10,000 residents in Shankill, many children and elderly, yet 1118 of these felt strongly enough to make an individual or group submission and over 3,000 residents also signed an on line petition protesting the plans. This shows the depth of opposition to the NTA proposals.

Many people suggested that Route 2A would be preferable but the NTA gave this no further consideration, even when openly questioned at a follow-up public forum. There was no willingness to review the overall plan, to consider alternative routes or other options such as having pull-ins for buses, bus lanes only in the immediate approach to junctions or the use of feeder buses to connect the DART and Luas. All suggestions were dismissed as having been taken into account and incorporated into revised plans.

In the most recent public consultations in 2020, the NTA confirmed that approximately 556 submissions were received for the Shankill to Bray section. This was at the height of Covid when people were under great pressure. The NTA now says that the total number of submissions for Route 13 were 755 – 556 represents nearly 74%. This implies that, contrary to the NTA's assertion, residents still had major concerns about the project.

The fact that the strong message from Shankill residents was ignored repeatedly is, to me, deeply undemocratic.



I would describe the NTA consultation with the local community as being a 'managed' process. Following the launch of Bus Connects, a Public Forum was set up by the NTA for Shankill residents. This was held in Stillorgan, not Shankill. In order to participate in this and subsequent Forums, attendees had to submit their names in advance. Questions were limited. Despite these restrictions, the first session was well attended by a cross section of the Shankill community and it was clear that there was very strong opposition to the NTA proposals.

At the session, the NTA suggested that a smaller group be formed from the representation to meet with the NTA. This group, the Shankill Bus Connects Contact Group subsequently was formed as a broad spectrum of the community of Shankill and I and other members of the group have engaged with the NTA throughout the process. Sadly we have felt that the consultations have largely been box ticking exercises.

The NTA has said that it has made a number of changes to its original plans for the Bus Corridor in Shankill following feedback from the community. In particular, it decided not to run the carriageway through the Main Street. I believe that this was more a case of the NTA realising that their plan was untenable. The narrowness of the road, different elevations, restrictions caused by the narrow bridge and above all the socially unacceptable aspects of the plan made it highly contentious. It was also the focus of much negative media attention.

In its Environmental Impact Assessment Report Volume 2 of 4 Main Report the NTA lists some of the concerns expressed by the Shankill community in relation to Route 13. It is implied that these have now been addressed in the final plan. This is not the case. Virtually all of the issues raised still apply. The village with its unique landscape, distinctive streetscapes and architecture, stunning trees, hedges and wildlife would be devastated.

The strong impression given by the NTA throughout our discussions was that there was a determination to proceed with the plans for Corridor 13, regardless of the facts or local knowledge, with as little amendment as possible. It was also suggested that all bus services would be removed from Shankill if their plan was not accepted.

As one of our local councillors said at a meeting with the NTA, changes that have been made can be defined as improvements to a deeply flawed plan. They have been attempts to reduce negative impacts rather than adding positives.



## **PART 2 - EFFECT ON ENVIRONMENT/ADVERSE EFFECT ON AN EU SITE**

### **PART 2A - UNDER-RECOGNITION OF SHANKILL AS AN AREA OF SPECIAL CONSERVATION VALUE**

As previously stated, Shankill is a beautiful village which is set in a stunning location between the mountains and the sea. It is part of the sweep of the bay from Dalkey Island to Bray, which is sometimes called Ireland's Bay of Naples. This includes the southern section of a large Irish Sea marine Special Area of Conservation which has recently been extended. The NTA refers to South Dublin Bay as being a Nature Conservation Site of Environmental Importance. Inexplicably this stops abruptly at Ballybrack. The only reason that I can see for this, is that there is an Uisce Eireann waste water treatment plant on Shanganagh Cliffs, just south of this area. There are also plans for off-shore windmills which would connect to shore at this point. It may therefore be seen as expedient to ignore the wildlife that exists. In my opinion, the seas, coastline and lands in this area should be given the protection they deserve. Killiney Hill and Bray Head do have this recognition.

The sea and the birds and mammals that use the Shankill coastline, see no such distinction and the beach and adjoining grasslands have retained a wildness that is not seen in other areas. Recently I have noted seals, cormorants, and other sea birds and every year we welcome the returning sand martins which make the cliffs their home. I have also noted harbour porpoises on occasion.

Likewise Shankill itself is a sylvan area with many mature trees, woodlands and hedges. The village has retained its rural charm, with country lanes, trees and parkland. It is in fact quite unique and should be treasured. The people of Shankill value their special village and do not want to see it harmed, particularly for such a flawed proposal.

The NTAs submission shows that many of the large landmark trees in south Shankill appeared in ordnance survey maps going back to the early 1800s and are of historical and cultural significance. A large number of trees throughout Shankill, north and south, are listed under DLRCoco's County Development Plan 2016 to 2022 under the objective to protect and preserve trees and woodlands. The NTA proposals to fell these and many other significant trees throughout Shankill are contrary to DLRCoco's Biodiversity and Tree Strategy. To quote the NTA submission, the plan 'will require removal of trees with preservation orders and substantial removal of mature trees. Sensitivity very high. Magnitude of change high/very high'. The removal of so many trees would diminish our ability to tackle climate change with implications for carbon absorption, air quality, protection from floods, land stabilisation, provision of shelter and shade, and enhancement of physical and mental well-being. It is counter-intuitive that the Government is offering people funding to plant woodland while at the same time sponsoring massive loss of woodland in Shankill.



While south Shankill is very rural in nature, it is not accurate to describe north Shankill as urban. Virtually the entire route through Shankill is bordered by large and stately trees on both sides of the road. The proposed level of destruction is shocking. It is vandalism by any other name.

In its Arboricultural Impact Assessment the NTA say that 359 trees, 41 groups of trees and parts of tree groups and 10 hedges and parts of hedges would be lost throughout the whole corridor. It is not clear what the breakdown is within Shankill specifically but the NTA have acknowledged that most loss of mature trees is in Shankill.

Our teams have counted nearly 500 trees that would be lost in Shankill alone but this is a very conservative estimate as it is not clear from the NTA reports exactly how much land is to be taken. Overall areas are suggested but no actual dimensions are given. Even the smallest house renovation requires this detail. Most of the route is lined by mixed hedging. In the dense woodland opposite Seaview we believe that well over 100 trees would be lost, if not many more. This mixed woodland is untouched by human activity and provides habitat for birds and mammals such as those that I have recorded in my own garden in Seaview Park. I have detected 52 distinct bird types with the help of my Merlin bird app (see Appendix 3) and have also been visited by foxes, squirrels, hedgehogs, field mice and recently even a wild rabbit. As well as the frogs that have long been resident, there are solitary and honey bees, butterflies, moths, dragon flies and other insects. I suspect that the woodland is also used as a roosting site for the protected bats which the NTA recorded at Seaview.

The NTA Tree survey of the entire route 13 was carried out between 17<sup>th</sup> July and 30<sup>th</sup> August 2020 and on three separate two day sessions – 30<sup>th</sup> November/1<sup>st</sup> December 2020, 29<sup>th</sup> / 30<sup>th</sup> November 2021 and 20<sup>th</sup> / 21<sup>st</sup> March 2023. There is no indication of how much time was spent doing fieldwork in Shankill specifically during July/August 2020 or on the other six days which were all in winter or early spring – not optimum times for assessing trees.

In Vol 3, Figure 17.2 of its submission papers, the NTA provides photomontages of the proposed route through Shankill. These are deceptive as the new trees shown would take decades, if not centuries in some cases, to replace those that are lost. Large gaps in our tree line and canopy would be left. Whether these trees would succeed in growing is debatable given the challenges from climate change, drought, pests, diseases and invasive species. The existing trees have built up their own inter-connecting mycorrhizal fungal root system which allows them to sustain each other during periods of stress. Those trees which are spared would suffer through the breakdown of this network.

Ireland has just 11% forest cover compared with the EU average of 35%. Of this 11% only 2% is native woodland. This is the very woodland that the NTA is proposing to remove in Shankill.



The Environmental Protection Agency has recently stated that 8000 hectares of new tree planting is needed each year. Instead very few trees are being planted in Dublin. Many are also lost to development. The very significant loss of trees in Shankill under the proposed Bus Connects scheme cannot be justified. Collectively we would be losing thousands of years of growth at a time when we need every existing tree that we have.

To quote a member of the NTA staff who replied to a query from me – ‘Volume 2, Chapter 12 – Biodiversity – only lists all the trees specifically with potential bat roost features to be removed only, which are mainly between Loughlinstown Roundabout and Wilford Junction.’

## **PART 2B – FAILINGS IN ENVIRONMENTAL ASSESSMENT**

I have talked to an Environmental Consultant and asked him to assess the processes used by the NTA. He has said that he would expect more survey work for a project of this size and scale. There is not enough survey work on trees and no indication of nest sites. He added that, on the basis of this data, it is not possible to say whether or not there are badgers present. There is a concentration of bats in Shankill, none of which have been located on the remainder of the route, but no roosts have been located. Bus Connects represents a major threat to these protected species. He added that the use of the Biodiversity website is common but variability needs to be noted. (I myself have not listed all the birds and animals that I have seen in my area because of the time it takes to do so).

My own view is that there seems to be a large reliance on desk top surveys and aerial views. Apart from the mention of trees, it is not clear how much time was spent on actual fieldwork and when such fieldwork might have been carried out. Again significant differences would occur between spring and summer and the winter time.

Despite this, the report does show the presence of protected species in Shankill. The amber-listed Black-Headed Gull and Herring Gulls were found in Shanganagh Park (and in or over my garden) and Leisler bats, Common Pipistrelle and Soprano Pipistrelle were also evident throughout Shankill. There has also been sighting of the Common (or not so common) Lizard.

Please do not endorse this deeply damaging and divisive Bus Connects Corridor in beautiful Shankill.



## APPENDIX 1

### EXTRACTS FROM ORIGINAL BACKGROUND RESEARCH CARRIED OUT BY BY THE NTA WHEN CONSIDERING PROPOSED ROUTES THROUGH SHANKILL

#### ROUTE 2B – (THE CHOSEN ROUTE)

Journey time savings would be minimal, particularly along the section south of Shankill as buses currently experience few delays.

Segregated cycle lanes would improve safety however widening of the road to the north and south of Shankill to provide bus lanes will likely result in increased vehicle speeds.

It is not practical to provide continuous bus lanes in both directions. There will be a queue system northbound in the village. At the narrow bridge north of village buses would have to merge with traffic.

In summary, Route 2B is the lowest in cost at €24.5m affecting 42 private land owners and 9396 sq metres. It is near to the catchment of Shankill and DART but **is not the most preferable for journey time reliability.**

Impact of Landscape/Townscape Character – Potential high major impact.

Landscape Impact on Protected Structures – Potential high impact. Significant impact on the curtilage of a number of protected structures throughout.

Visual impact on properties – High Major Impact.

Significant Land Take will have a dramatic effect on the existing character of the road corridor south and north of Shankill village. Significant land take to either side of the road both north and south of Shankill village will result in significant loss of boundary stone walls, existing mature trees and impact on garden properties. This will include St. Anne's Church Car Park, Rathmichael School, the playground and open space at Shanganagh Park, open space at Beech Road, Castle Farm, Cherrington Drive.

Amenity, Open Space, Recreational/Sports Lane Use – Potential medium high impact.

Tree Protection/Preservation. Potential high major impact. Significant impact on a number of tree protection/preservation objectives throughout.

There will be sections of the scheme through Shankill primarily where the proposed scheme will result in traffic being relocated close to sensitive receptors due to road widening. Where this is the case there is likely to be an increase in noise, vibration and air pollutants.



Elsewhere it says:-

There would be impact on the urban centre of Shankill (which is constrained by building lines) and would require significant private and public land acquisition as well as environmental impacts including the removal of trees. There are also a number of primary and secondary schools and a number of hospitals and medical centres.

Extensive road widening would mean the removal of a large number of significant mature trees as well as impacting on walls and boundaries of architectural heritage significance.

This option will result in the loss of existing tree lines, field boundaries, hedgerows, as well as public green areas along Dublin Road through Woodbrook. A large number of mature trees will need to be removed on the section between Shankill Village and Wilford Roundabout along the Dublin Road. These trees have the potential to host nesting birds within the bird nesting season and roosting bats. Many of these trees are included within the DLR County Development Plan 2016 – 2022 under the objective to protect and preserve trees and woodlands’.

It concluded ‘BUT ALL ROUTES ARE A PROBLEM AT LOUGHLINSTOWN ROUNDABOUT. The removal of noise and visual tree banks would result in eight lanes of traffic. Two metre solid walls are proposed’. As I have previously said, there would now be ten lanes of traffic at this point.



## **APPENDIX 2**

### **EXTRACTS FROM THE NTA'S OWN SUBMISSION WHICH HIGHLIGHT THE UNIQUE NATURE OF SHANKILL**

#### **'Streetscape Character**

Historic road corridor through suburban edge parkland leading to compact village core and village suburbs to north. South of Shankill the road retains much of its historic aesthetic with a series of historic parkland properties, (protected structures), with formal entrances, lodges, boundary walls and extensive tree and boundary planting. This visual character is enhanced by the relatively narrow and winding tree-lined nature of the road with defining boundary walls. North and south of Shankill village the former grounds of large properties have gradually been developed for residential or other use. Major public park and cemetery located at Shanganagh. Narrow predominantly concrete footpaths throughout, locally widened and improved through Shankill village. Traditional village setting with attractive mix of generally two-storey residential and commercial streetscape, generally fronting public footpath with trees in planters to west and setback with front gardens and street trees to east. Some historic boundary walls backed by mature trees retained at either end – especially along rising road to north of village. Sections of on-street parking – especially along west side of street.

#### **Key Townscape Features**

Other key properties which enhance the overall character include Rathmichael Parish National School, St. Anne's Church, Shanganagh Park and Cemetery, Hackett Memorial Hall, and St. James' (Cringen) Church and grounds. Locally distinctive features such as historic boundary walls, entrances and associated lodges, mature and historic roadside boundary trees and woodlands, and mature street trees and the corridor of the former Dublin and South Eastern Railway with its stone bridges and structures.

#### **Amenity Designations**

Major open space zonings at Shanganagh Park and Cemetery with smaller areas Castle Farm and Dorney Court. Greenbelt east of Dublin Road at Woodbrook House, Corke Lodge and The Coach House (Woodbrook). Greenbelt west of Dublin Road from Wilford to Southlands.

In other words, the NTA itself is stating how amazing Shankill is. It should not be destroyed.



### **APPENDIX 3**

#### **52 INDIVIDUAL BIRD TYPES RECORDED IN OR FLYING OVER 4 SEAVIEW PARK**

Bank Swallow	Blackbird
Blackcap	Black-Headed Gull
Black Redstart	Blue Tit
Bullfinch	Buzzard
Carrion Crow	Chaffinch
Chiffchaff	Coal Tit
Collared Dove	Coot
Duncock	Goldcrest
Goldfinch	Great Tit
Greenfinch	Green-Winged Teal
Grey Heron	Grey Wagtail
Herring Gull	Hooded Crow
House Martin	House Sparrow
Jackdaw	Kingfisher
Linnet	Long Tailed Tit
Magpie	Mallard
Moorhen	Oyster Catcher
Raven	Red-Breasted Flycatcher
Red Crossbill	Redwing
Reed Bunting	Robin
Rock Pigeon	Rook
Ruddy Turnstone	Siskin
Song Thrush	Starling
White Wagtail	Wigeon
Willow Warbler	Wood Pigeon
Wren	Yellowhammer



**APPENDIX 4 OF SUBMISSION MADE TO AN BORD PLEANALA**

**BY CAROL SCOTT**

**4 SEAVIEW PARK**

**SHANKILL**

**BUS CONNECTS CORRIDOR 13 – LOUGHLINSTOWN ROUNDABOUT TO WILFORD  
JUNCTION**



**APPENDIX 4**

**SHANKILL'S COASTLINE AND TREES**



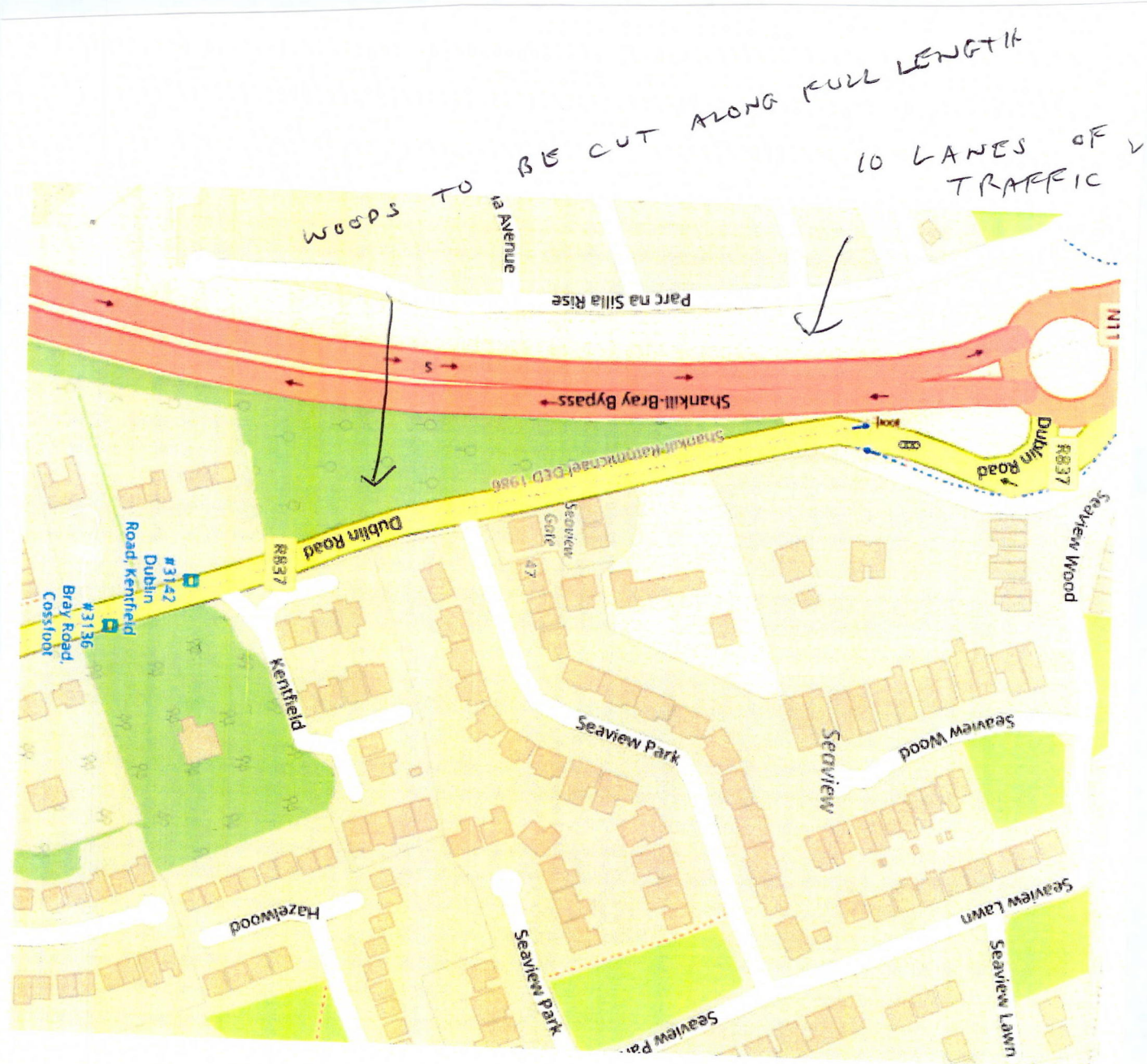


**WOODLANDS OPPOSITE SEAVIEW TO BE FELLED – ON RIGHT LOOKING FROM LOUGHLINSTOWN ROUNDABOUT**





**MAP SHOWING LOUGHLINSTOWN ROUNDABOUT, R837 AND N11/M11 MOTORWAY**  
**NOTE PROXIMITY OF SEAVIEW ESTATE AND OTHER ESTATES TO BE EXPOSED**  
**POTENTIALLY TO 10 LANES OF TRAFFIC WITH WOODLAND CUT BACK**





**TREES AND HEDGES, ALL TO BE FELLED – ON LEFT LOOKING FROM RATHMICHAEL SCHOOL  
TOWARDS LOUGHLINSTOWN ROUNDABOUT**



**TREES AND HEDGES, ALL TO BE FELLED – ON LEFT LOOKING FROM WOODBANK TOWARDS LOUGHLINSTOWN ROUNDABOUT**





**SHANKILL VILLAGE LOOKING TOWARDS BRIDGE AT ST. ANNE'S AND WOODS IN DORNEY COURT ON RIGHT – NOTE GRANITE WALLS SEEN THROUGHOUT ENTIRETY OF VILLAGE**



**TREES TO GO AT CRINKEN GLEN/BEECHFIELD – EXPOSING HOUSES TO CORRIDOR**





GRANITE WALL AT BEECHFIELD. IT AND GARDEN BEHIND TO GO



SOME LANDMARK TREES TO GO ADJOINING ST. JAMES'S CHURCH, CRINKEN JUST SOUTH OF SHANGANAGH PARK





**MORE LANDMARK TREES TO GO AT WOODBROOK**

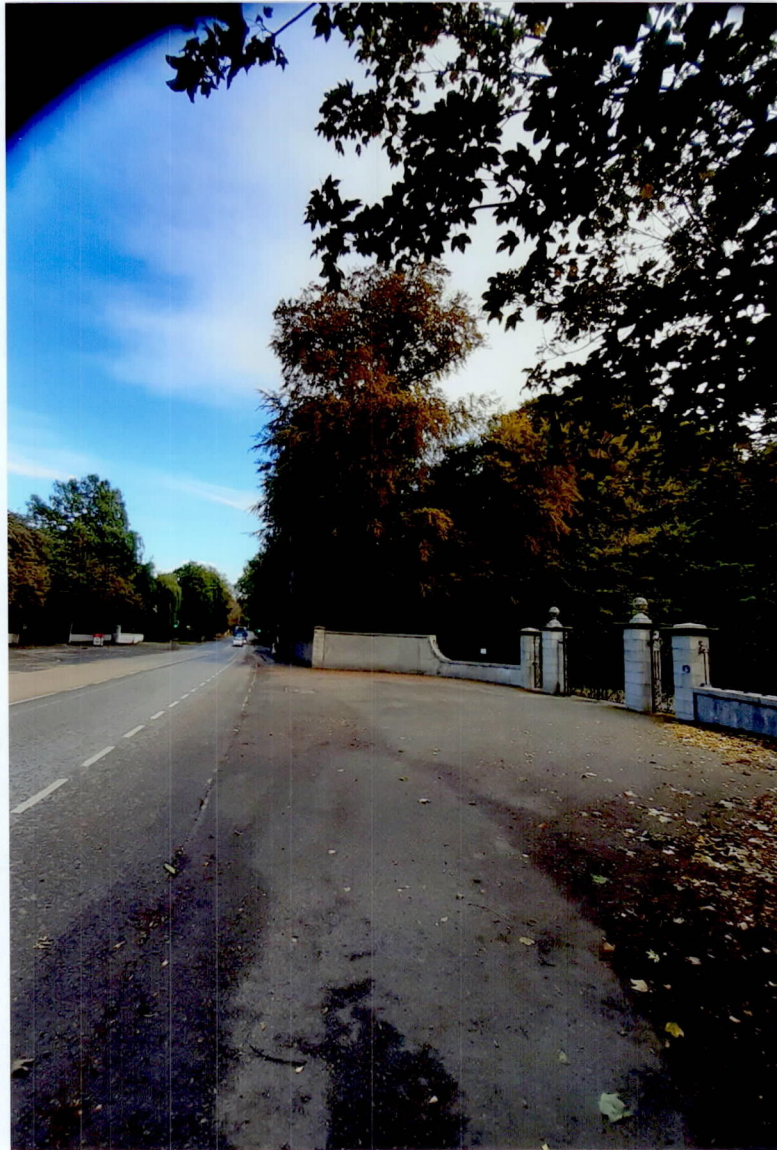


**MORE LANDMARK TREES TO GO AT WOODBROOK**





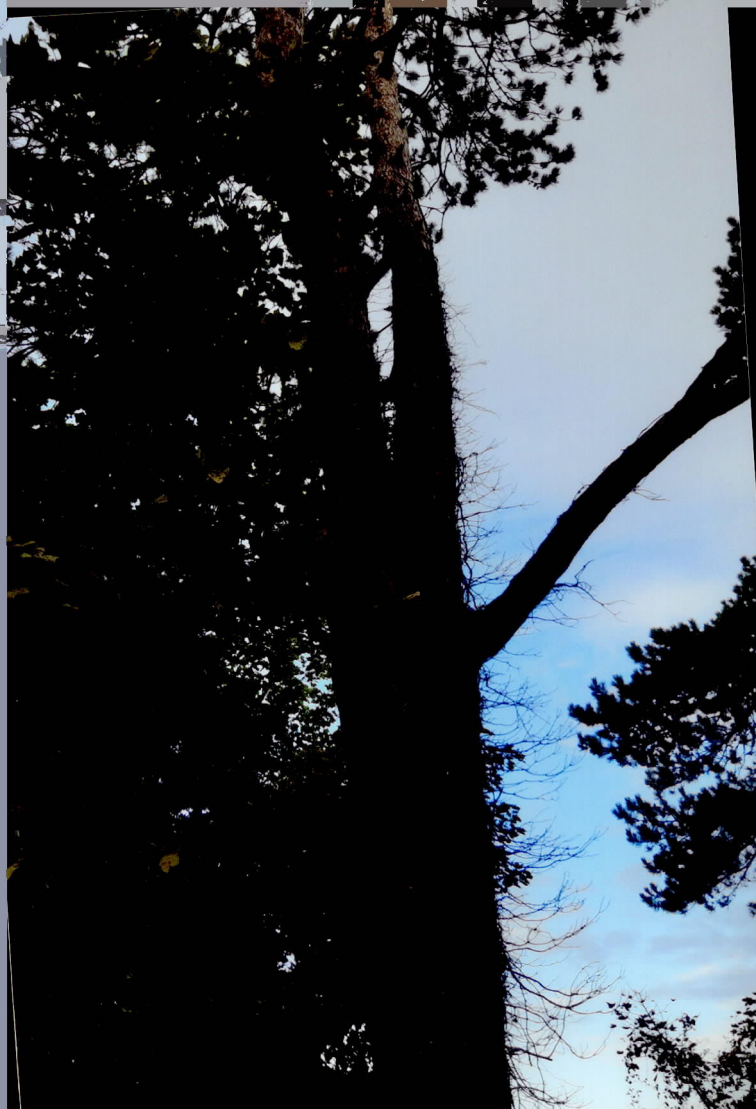
ONE OF THE HISTORIC DEMESNES AT WOODBROOK – TREES ON LEFT ALL TO GO



**TREES TO GO SOUTH SHANKILL**







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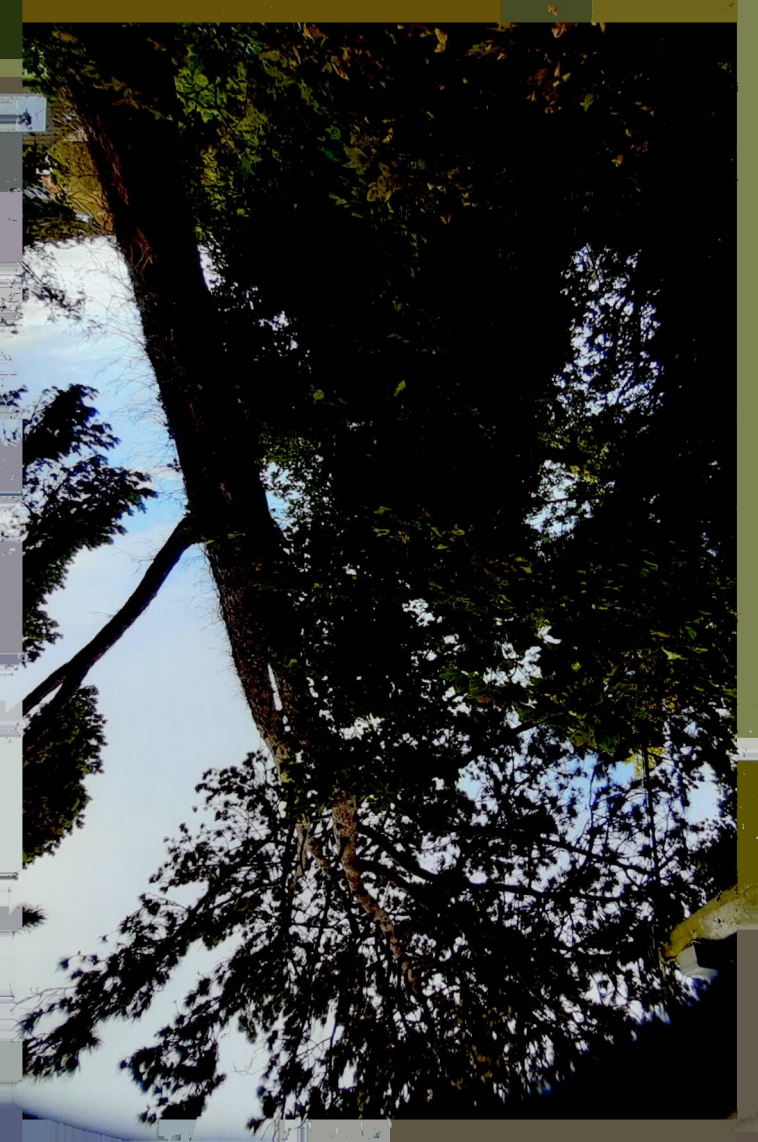
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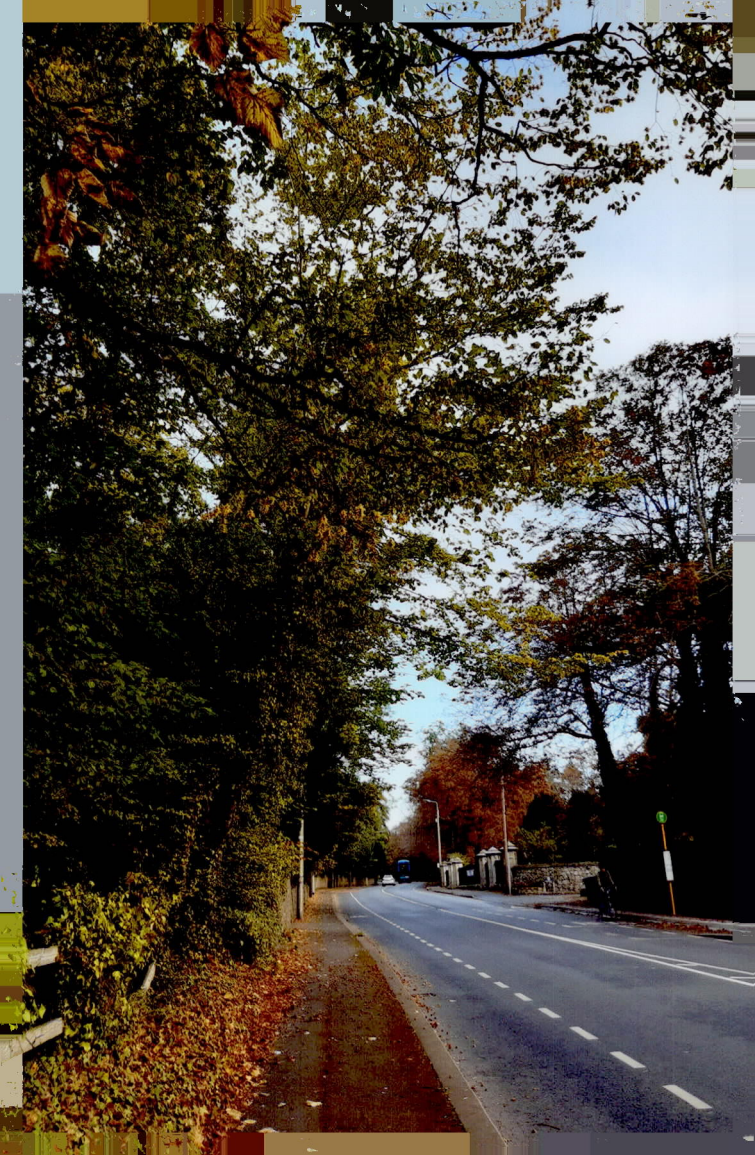
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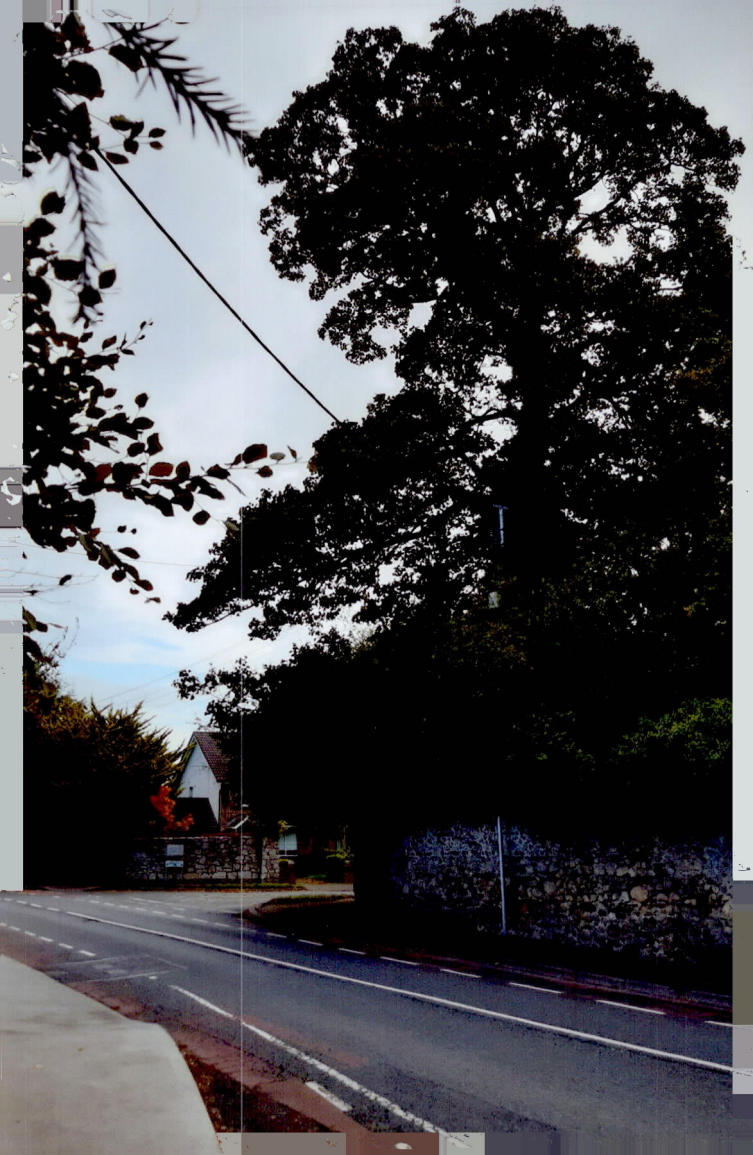
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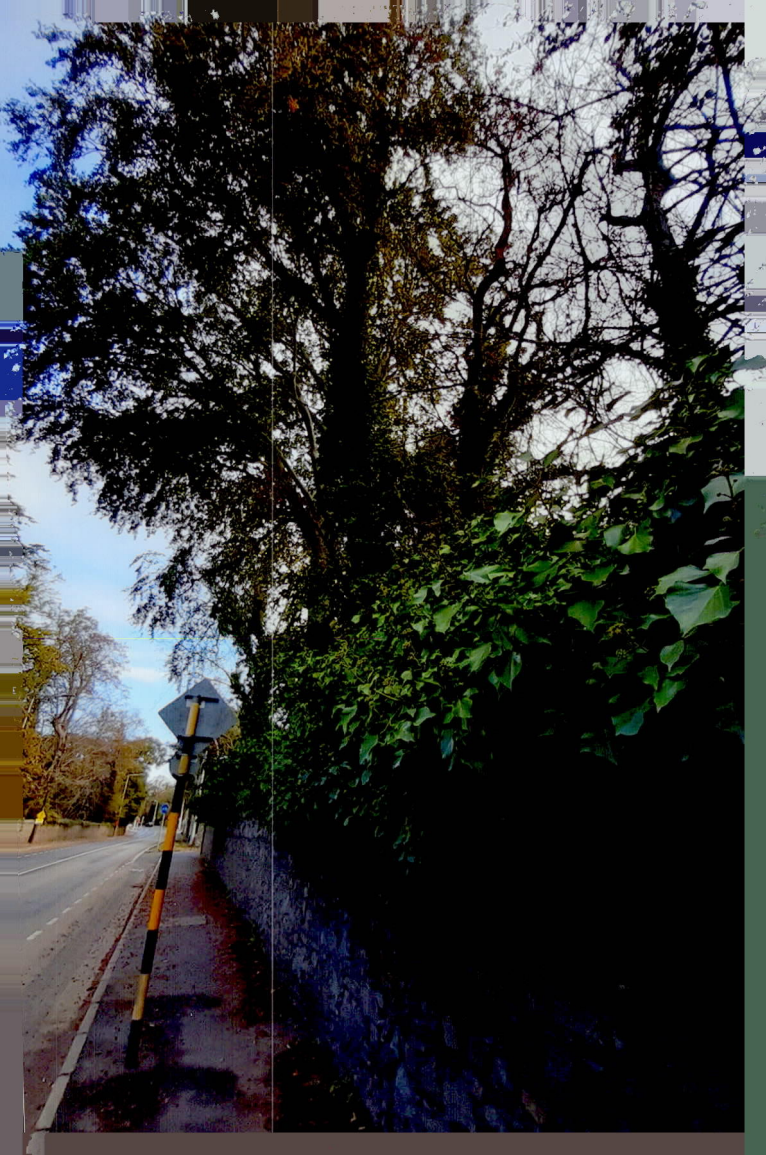
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