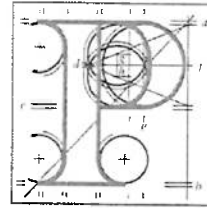


**Our Case Number:** ABP-317742-23



**An  
Bord  
Pleanála**

Céleste Golden  
335 Olcovar Apartments  
Shankill  
Co. Dublin

**Date:** 18 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 note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

Please be advised that those listed on the Compulsory Purchase Order schedule associated with this application are not required to pay the €50 fee associated with this case. As you are listed on the schedule, a refund of €50 will be issued to you under separate cover.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto: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

<b>Teil</b>	<b>Tel</b>	(01) 858 8100
<b>Glaio Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

An Bord Pleanála  
64 Marlborough Street  
Dublin 1

<b>AN BORD PLEANÁLA</b>	
10 OCT 2023	
LTR C	
LDG-	067635-23
ABP-	317742-23

Céleste Golden  
335 Olcovar Apartments  
Shankill  
Co Dublin

10<sup>th</sup> October 2023

Reference: Compulsory Purchase Order - National Transport Authority – Bray to City Centre Core Bus Corridor Scheme:  
Route 13 - Plot List: 1085(1).1a, 1085(2).1d, 1085(3).1e, 1085(4).1e, 1085(5).2e

ABP 317742

Dear Sir / Madam,

We write to object to the above listed Compulsory Purchase Order issued to us by the National Transport Authority (NTA).

The widening of the Old Dublin Road through Shankill Village for a bus corridor to the front of our property will be detrimental to traffic management, to the environment / natural habitat and to the safety of our neighbours, small children, and the elderly.

We commute to the city centre by bus from Shankill (Route #145 or 155) which takes 55 minutes to St Stephen's Green. The only part of the journey from Shankill with delay is at Donnybrook & Leeson Street Bridge. Unless the traffic light signalling is enhanced at these two bottlenecks, no bus corridor is going to reduce time spent on the bus.

We do not wish to reduce our bus journey by the NTA's suggested 6 – 9 minutes under any circumstances if it means the devastation and destruction of our local environment and community.

The NTA's proposal is without intelligible evidence or data to support their "considerations". The document is impossible to download and NTA's responses to submissions has been wholly unsatisfactory.

The proposed bus corridors through Shankill along the Old Dublin Road must be reconsidered for the following reasons:

1. Since COVID commuter behaviour has radically changed with many people working from home 2 - 3 days per week. Considering this the NTA proposal should be completely reassessed as it is not fit for purpose. It does not take into consideration massive shifts in the usage of buses from Bray to the City Centre by commuters in 2019 versus 2023 and on into the future.
2. Working from home is national policy now with a minority commuting 5 days per week. This is evidenced by the number of commuters on buses from Bray through Shankill and the reduced traffic congestion along the M11/ N11.
3. Most buses from Bray at 7am – 9am are filled with school children and college goers not commuters. Most students from Bray are exiting buses for school at Cabinteely, Foxrock, Stillorgan and UCD, not Shankill. Bray students going to Woodbrook College in the main cycle or walk to and from Bray.
4. The M11/N11 provides a perfect solution for some bus routes from Bray at peak hours to bypass Shankill at the Woodbrook roundabout to Loughlinstown roundabout (Bus Connects 2A Route Option).
5. A bus shuttle service between Bray and Loughlinstown roundabout might also be considered to allow local bus users travel to and from Bray to Shankill.
6. We are serviced by several private bus companies providing services from Bray to the LUAS and from Glendalough to City Centre via Shankill, which speed along the current bus corridors as far as Leeson Street, where everything stops.
7. The financial cost of the proposal is ludicrously wasteful.
8. Our money would be better spent on enhancing Dart and rail services, the provision of the extension to the LUAS and accessibility to the new Dart station at Woodbrook.
9. Shankill is a two-time gold medal Tidy Towns winner (October 2023). The community of Shankill take great pride in our village, and we do not wish to see a stretch of road from Woodbrook to Crinken become a highway for

- speeding and accident black spot with six lanes of traffic (cycle lane, bus corridor, traffic lane north, traffic lane south, bus corridor, cycle lane) with no median or pedestrian crossing for the cemetery.
10. Evidence shows that the removal of roundabouts (three proposed in Shankill by the NTA) increases speed violations and is the cause of road traffic accidents.
  11. Residents use the present roundabouts at either end of the village to come and go to the village centre. If the roundabouts are removed residents will be making three point turns in the centre of the village to return home. This will cause congestion, slowing the flow of traffic.
  12. The NTA under-report or do not report at all the number of trees to be removed in their proposal.
  13. The felling of mature trees contravenes Dun Laoghaire Rathdown County Council's Biodiversity Action Plan and Tree Strategy.
  14. We have walked the 3km stretch with the maps provided by the NTA and have counted at least 400 trees from the Loughlinstown roundabout to Woodbrook that would have to be cut down if this destructive proposal were to be approved.
  15. The devastation to the beautiful tree lined road between the Woodbrook roundabout and Shankill Cemetery, where many of the trees have been growing for over 100 years cannot be permitted.
  16. Some tree species in Shankill are protected.
  17. The proposed felling of trees and wooded areas behind the Old Dublin Road stone walls are home to bats, the common lizard (not common), badgers, foxes, hedgehogs, shrews, birds and insects. Some of these creatures are protected and / or endangered.
  18. The lack of an environmental impact assessment by the NTA is wholly unsatisfactory considering the three species of bats identified which are protected (section 12.1 -12.8).
  19. The old granite walls throughout the village are part of our built environment / heritage and should not be destroyed. These walls provide sound barriers for the houses behind this busy road.
  20. The NTA's data regarding traffic volumes is unintelligible.
  21. Chapter 3 of the scheme / proposal discusses diverting buses to the M11/N11 which has now been dismissed by the NTA – this contravenes the public consultation process.
  22. Wicklow County Council is progressing the development of the M11/ N11 Bus Priority Interim Scheme (BPIS) in partnership with Dun Laoghaire Rathdown County Council, Transport Infrastructure Ireland, the NTA and the Department of Transport.
  23. The NTA's Bray to City Centre proposal does not account for the above BPIS, thus NTA should discontinue their entire bus corridor plan or at least review the option to integrate it with the M11/N11 plans - bypassing Shankill (which is what made Shankill the village it is today in the first place).
  24. The CPO received is not explicit, it does not detail the exact amount of land to be compulsorily acquired.
  25. An oral hearing and / or a judicial review is required.

For these reasons we request An Bord Pleanála please reject the NTA's scheme in its entirety.

Best regards,



Céleste Golden 335 Olcovar Apartments, Shankill, Co Dublin

Joe O'Sullivan 334 Olcovar Apartments, Shankill, Co Dublin

Seán O'Leary 426 Olcovar Apartments, Shankill, Co Dublin