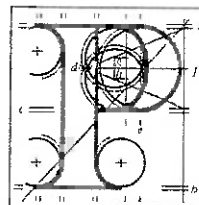


Our Case Number: ABP-317742-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Conor Gerard Maher
9 Cherrington Drive
Shankill
Dublin 18
D18AN20

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 (including your fee of €50) 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.

If you have any queries in the mean time, 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

HA02

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

BRAY TO CITY CENTRE CORE BUS CORRIDOR SCHEME

Strategic Infrastructure Development Application

Bord Pleanála Case reference: [KA27.317780](#)

Conor Gerard Maher

9 Cherrington Drive

Shankill

Dublin 18

D18 AN20

The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902

Dear Secretary,

I wish to make this submission in respect of the application being made by the National Transport Authority pursuant to section 51(2) of the Roads Act 1993 (as amended) in relation to the proposed Bray to City Centre Core Bus Corridor Scheme. In particular I wish to state my objections to the proposals in respect of Section 3 of the Scheme extending from Loughlinstown Roundabout to Wilford Roundabout, encompassing the village of Shankill and its northern and southern approaches.

I make this submission as a Shankill resident and as a regular user of the 145/155 bus routes.

I object on the basis of the following primary grounds and as further elaborated hereunder.

- Non-compliance with EPA Guidelines on the Preparation of EIAR and the EIA Directive – particularly in respect of consideration of alternatives,
- Non-compliance with the objectives of the Dun Laoghaire-Rathdown County Development Plan 2022-2028,
- Misleading and contradictory information provided in the documentation submitted,
- Inadequate information presented on the traffic and transportation benefits of the proposed scheme, particularly in relation to benefits accruing from the proposals in Section 3, Loughlinstown to Wilford Roundabouts,
- Excessive expenditure to deliver minimal benefits from Section 3 proposals, whilst at the same time causing unwarranted damage to Shankill and its environs.

Introduction

I make this submission as a Shankill resident and as a regular user of the 145/155 bus routes to the city centre. There is no doubt that the level of service along the corridor between Bray / Shankill and the City Centre needs to be upgraded – but not at the price of the destruction of Shankill Village and its northern and southern approaches.

The starting point of the BusConnects concept has been the development of the series of radial arteries between the city centre and various suburbs. There has been virtually no investment in the N11 QBC in thirty years and now the National Transport Authority are proceeding to an invasive and environmentally destructive approach to addressing those three decades of under-investment. Why is it that in that time there was little or no investment in basic bus priority measures at the multiplicity of traffic lights along the N11 route from the City Centre? Morning after morning, evening after evening we watch frustrated as the bus stops to pick up or drop off passengers only to see the traffic light 50m ahead turn red as the bus approaches. How much time is lost on every single journey due to this lack of provision of basic traffic light technology. Yes, we are now told that these technological improvements will be included as part of the proposed scheme. However, in the consideration of alternatives presented in the EIAR, no attempt has been made to assess the beneficial impact of such enhancements as improved traffic light technology and proper camera based enforcement of the bus lanes, independent of the civil engineering measures. Why jump straight into an expensive civil engineering approach to the enhancement of bus services?

It appears that the proposed scheme will reduce to some degree the number of bus stops along the route. This is welcome, because there are too many stops along the route. In reality the frequency of bus stops and the associated deceleration time, boarding time and acceleration time for these closely spaced bus stops comprise a very large part of the typical journey time.

However, none of the information presented provides any metrics on the potential journey time savings derived either through enhanced traffic light functionality or by the optimisation of the bus stop spacing. Had the National Transport Authority undertaken a proper consideration of alternatives, then the benefits of such “Do Minimum” measures would have been quantified, but the NTA have not done so in the EIAR.

What the National Transport Authority have done is to deliver an apparently pre-determined outcome by adopting a well-established new road planning model and inappropriately shoe-horning the planning process for strategic road-based public transport infrastructure into this inappropriate model.

This approach also contaminates the consideration of alternatives by instilling the mentality of road based schemes on new alignments. In new cross country road schemes there is no choice but to go from the starting point at A to the end point of a project at say D. You can't break the scheme between say B and C – otherwise you don't have a usable scheme. That is not the situation in the case of an on-line bus improvement such as the Bray to City Centre scheme. If the financial and environmental costs along a particular section are disproportionately high then it is perfectly feasible and reasonable to consider an alternative whereby the section between B and C is omitted, especially if 95% of the benefits are being retained along the remainder of the route. It is my contention that this is exactly the situation that prevails in respect of Shankill Village and its northern and southern approaches. At the very least there ought to have been consideration of an option whereby Section 3 was omitted from the proposals. Had they even taken the time to break out the

modelled estimates of journey time savings and additional users along the four sections of the route, it would have allowed the Board to assess the balance of benefit versus environmental cost on a section by section basis.

Deliberately or inadvertently, the NTA and their consultants have not provided that breakdown and I contend that this is a major omission from the volumes of material that they have been submitted as part of this planning application.

It is also my contention that the Board must seek to have this breakdown provided to it in order to assist it with its deliberations.

Consideration of Alternatives

The consideration of alternatives in the original Bray to UCD CBC Feasibility & Options Report undertaken by CH2m Barry, and adopted in the present application, is flawed in a number of respects.

Firstly, as adverted to above, it only considers route options – not interventions that would include alternative means of delivering enhancements to bus services on the route.

Secondly, while it may broadly adhere to the EPA's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports it does not meet the requirements of the EIA Directive to provide *"A description of the **reasonable** alternatives.... which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects"*.

The Feasibility and Options Report identifies a number of route options, including the chosen route along the existing R119 / R837 through Shankill Village between Wilford and Loughlinstown Roundabouts (Route Option 2B). An alternative route running to the east and outside of the M11 corridor (Route Option 2A) was also considered as were combinations of these two routes.

I wish to focus on Route Option 2A. I contend that Route 2A was never a viable option. The proposed alignment on the eastern side of the M11 coincides with the proposed alignment for the future extension of the Luas Green Line from Brides Glen to Bray, as set out in the Bray and Environs Transport Study 2019, see Fig 1. This alignment is confirmed in the Dun Laoghaire-Rathdown County Development Plan, see Fig 2.

South of Crinken Lane bridge, there is generally adequate space to accommodate the future Luas Line and a dedicated two way bus lane with cycle track provision. However, north of the Lordello Road footbridge this is not the case. There are pinch points at Newvale and at Stonebridge Close between Lordello Road footbridge and Stonebridge Road. There are further pinch points north of Stonebridge Road at Stonebridge Wood and Newbank.

Allowing a bare minimum of 3m for each bus lane and Luas track, consistent with the cross section for the dedicated busway presented in the Feasibility document and allowing 1.5m edge distance gives an absolute minimum reservation width of 15m. Whatever about being able to avail of lands within the current motorway reservation adjacent to Stonebridge Close, it would not be possible to accommodate this width of reservation for both Luas and Busconnects at the corner of Newvale, at Stonebridge Wood and at Newbank. In the case of the latter two locations, a number of recently constructed houses would have to be demolished. Of course, this could be done – but none of this was referenced in either the Feasibility and Options Report or in Chapter 03 of the EIAR –

Consideration of Reasonable Alternatives. Although the EIA Directive does not require a mini-EIA for each of the alternatives presented, it surely does require that the options tabled are at least viable and that all principal relevant constraints have been identified. This has not been done in the case of Options 2A, 2C and 2D and none of these Options is therefore viable or valid.

That leaves Option 2E, which is a highly unlikely option to consider. Why would one choose an off-line option to the south of Shankill, at considerable cost for land acquisition and construction, only to revert onto the existing R119 through Shankill Village?.

In essence, of the options considered only one was ever viable – namely Option 2B through the Village.

M11 Priority Bus Measures

Table 6.1 summarising the Stage 1 Route Options Sifting Summary in the Feasibility and Options Report states the following:

Section of M11 from the on ramp at Dublin road (link 2.01) to the split for the M50. This link consists of two all-vehicle lanes in each direction, with an average carriageway reserve of 35m. No cycle routes proposed by the GDA Cycle Network Plan run along this link. The section of route forms part of Dun Laoghaire Rathdown Development Plan 6-year objective to upgrade the M11 from the M50 to Fassaroe. In addition, the proposed LUAS green line extension to Bray/Fassaroe is identified as following the M11 route.

However, road widening to provide dedicated bus lanes on each side of the road would be severely constrained by structures such as overbridges etc. Sharing existing lanes with general traffic is not considered desirable due to potential for traffic congestion to delay buses, and also the potential for high speed differentials and safety concerns.

Additionally, this route does not serve the catchment of Shankill. For these reasons, this is not considered a viable route option.

However, the link to Wicklow County Council's website [N11-M11-Bus Priority Interim Scheme](#) for the new proposed bus priority measures on the M11/N11 between Loughlinstown Roundabout and the Glen of the Downs demonstrates that bus priority measures on the M11/N11 corridor were in fact quite feasible. Drawings of the proposal are available on the website. A plan of the northern section, coinciding with Section 3 of the Bray to City Centre Core Bus Corridor is shown in Fig 3.

I am not advocating the removal or re-direction of bus services from Shankill; however, it appears that an Option that was summarily dismissed at Feasibility and Route Options Stage is now not just acceptable but is seeing the light of day and it would appear that the severe constraints identified at the time of the Feasibility and Options Report have been successfully overcome so as to allow priority bus measures to be accommodated within the motorway reservation in the section of the M11 between Loughlinstown Roundabout and Wilford Junction (Junction 5).

I contend that all of this points to a route selection process that has not complied with the requirements of the EIA Directive in the consideration of alternatives, and in consequence the Board must have regard to this fundamental non-compliance when it makes its determination in this matter.

Non-Compliance with objectives of Dun Laoghaire Rathdown County Development Plan

The County Development Plan sets out objectives in relation to protection and preservation of trees. The proposed scheme has not had proper regard to the Development Plan objectives, particularly in respect to the northern approach to Shankill Village between Loughlinstown Roundabout and the Village and the southern approach from Wilford roundabout. The approaches to Shankill Village via the R837 and the R119 are unique in providing a rural setting so close to urban centres. The importance of the retention of hedgerows and trees for ecological purposes and for the ecological purposes and for the benefits deriving for flora and fauna are recognised in the County Development Plan. In this regard, the proposals under the scheme are at direct variance with the objectives of Chapter 9 of the Plan - Open Space, Parks and Recreation

Moreover, the traffic proposals for Shankill Village directly contravene a Special Local Objective in the County Development Plan 2022-2028.

The proposed removal of the roundabouts at St. Anne's Church and at Quinns Road/Cherrington Road directly contravenes SLO 148 which is *"To protect and safeguard the roundabouts on the approaches into Shankill village at St. Anne's Church and at the junction of Dublin Road (R119) and Quinn's Road."*, see Figs 4 & 5.

Contradictions in the Information Provided

Chapter 3, Consideration of Reasonable Alternatives, describes the various alternatives considers for Section 3. The preferred Route Option, Option 2B is described as follows:

Route Option 2B would commence at the Wilford Junction and run via the Dublin Road through Shankill Village to Loughlinstown Roundabout and north to the Wyattville Interchange. Due to particular constraints along this route, particularly around Shankill Village, the route was broken down into a number of sub-sections with separate options assessments undertaken for each. The following lists the sub-sections and their individual options, with the chosen option indicated:

- Wilford Roundabout to Crinken Lane
 - **Option 1** – providing parallel bus lanes, cycle tracks and footpaths in a 20m cross-section. Southbound footpath to run through Shanganagh Park (chosen option); and
 - **Option 2** – providing dedicated bus lanes and footpaths with a section of off-line cycle tracks running to the east of the Dublin Road.
- Crinken Lane to St. Anne's Church Junction:
 - Cycling – as it is not possible to provide continuous dedicated bus lanes and cycle tracks along this section, four options were considered for alternative cycle routes (refer to Section 3.3.3 of this Chapter for further details);
 - **Option 1** – a northbound bus lane between Crinken Lane and Quinn's Road, with a section of northbound bus lane through Shankill Village between Stonebridge Close and Lower Road, and a southbound bus lane between Stonebridge Close and Crinken Lane;
 - **Option 2** – bus lanes in both directions between Crinken Lane and Quinn's Road, and a southbound bus lane between Lower Road and Crinken Lane; and
 - **Option 3** – a northbound bus lane between Crinken Lane and Quinn's Road, with a section of northbound bus lane through Shankill Village between Stonebridge Close and Lower Road, and a southbound bus lane between Lower Road and Crinken Lane (chosen option). This section does not have segregated cycle tracks as cycling options were evaluated separately through this section as discussed under Section 3.3.3.
- St. Anne's Junction to Loughlinstown:
 - **Option 1** – bus lanes in both directions between St. Anne's Church Roundabout and Loughlinstown Roundabout, with a two-way cycle track on the western side of the Dublin Road between St. Anne's Church Roundabout and the Resource Centre, and a two-way cycle track on the eastern side of the Dublin Road between Seaview Park and Loughlinstown Roundabout (chosen option); and
 - **Option 2** – bus lanes in both directions between St. Anne's Church Roundabout and Loughlinstown Roundabout, with an alternative cycle route provided linking Loughlinstown Roundabout to Shanganagh Road and St. Anne's Church Roundabout via Seaview Wood and Seaview Park.

This indicates that from Crinken Lane to St. Anne's Church, chosen Option 3 includes a northbound bus lane from Crinken Lane to Quinns Road, with a section of northbound bus lane through Shankill Village between Stonebridge Close and Lower Road and a southbound bus lane between Lower Road and Crinken Lane. This contradicts the photomontage images taken between Crinken Lane and Quinns Road (Fig 6) and opposite Stonebridge Close (Fig 7). I would be happy if the Photomontages represent the correct position – but which are people to believe?

I understand that the NTA, as promoters of the project, have voluminous quantities of information to prepare and that inconsistencies in the documentation can sometimes arise. However, local residents are even more challenged in having to try to digest these volumes of technical information, presented as part of this Statutory Process. It is particularly unfortunate that the NTA have caused such uncertainty at the very location where there is the greatest concern and angst in the community of Shankill arising from this project. Which scenario are we to believe?

Deficiencies in the Traffic and Transport Analysis

It is worth noting that since the original consultation process in 2019, the section of the originally proposed scheme between Leeson Street / St. Stephen's Green junction and Nassau Street has been omitted. This is not an unreasonable decision given that it will be very difficult to make any improvements to bus lanes or journey times within the city centre area. However, it must also be said that quoted journey times in the Traffic and Transportation Chapter of the EIAR from Bray to Leeson Street very much understate the total journey time to get to get to the city centre at (say) O'Connell Bridge, or to cross the city centre. The reality is that journey time savings on the entire route between Bray and St. Stephen's Green will be far outweighed on many days by the delays and unreliability of journey time between Leeson Street and O'Connell Bridge and beyond.

The five or so minutes savings that this project will deliver along the N11 corridor pale into insignificance in comparison with the serious delays and snail's pace of progress through the City Centre area. Nothing in the current proposal will improve this situation. This again poses the basic question, why wreak destruction on the suburban rural edge of Dublin, in order to gain a few minutes' time savings that will be immediately lost once the bus reaches Leeson Street Bridge / Stephen's Green?

I would like to raise a number of points regarding the traffic and transportation analysis presented in the documentation.

Journey Times

The Bray to UCD CBC Feasibility and Options Report presents in Section 8.4.3 the inbound and outbound journey time profile between Bray and UCD for the 145 route. These are shown in Figs 8 and 9.

Of particular note is the journey time profile between Shankill Village and Wilford. Inbound, (Fig 8), journey peak time bus speeds are 50km/h in the am peak, but reducing at Claremont at the southern edge of Shankill Village. Off-peak after 7pm, the average speed is marginally over 60 km/h, again dropping on the immediate approach to Shankill village. The speed limit on this section of road is 50km/h. So at peak times, average bus speed matches the speed limit.

Outbound presents a similar profile – but in reverse, (Fig 9). Southbound bus speeds, both peak and off peak, increase at Shankill Village, rising to approximately 46km/h between the village and Wilford in the pm peak and to 54 km/h before 7am.

How therefore can there be any justification, given this profile, in destroying this unique streetscape / landscape, causing profound long term negative impacts, when there is no need or no benefit from these actions in terms of journey time improvement or reliability? In the circumstances, it beggars belief, that the NTA is willing to spend €24m-€26m (based on 2017 prices), or approximately 48% of the overall scheme cost, in causing such damage to Shankill and its environs for literally no benefit in journey time.

Chapter 06 – Traffic & Transport

Chapter 06 of the EIAR identifies a number of the benefits of the proposed scheme in terms of journey time savings, improved reliability and improved bus usage. What it does not do is to provide any disaggregation as to the contributions of the different Sections of the scheme to these improvements. It ought to have - especially given the huge impacts on Shankill and its environs for minor or negligible benefits in terms of the overall scheme - the people of Shankill and the Board ought to be provided with this information.

I refer to my previous comment in which I noted that it was not valid to present a public transport scheme such as the Bray to City Centre Core Bus Corridor Scheme as an end-to-end project which could not be varied or shortened. In fact, this has already happened, with the truncating of the scheme at Leeson Street / St. Stephen's Green junction, rather than continuing to Nassau Street as had the original Corridor 13 proposal, on the basis presumably that along this section of the city centre would either prove too costly, of too little benefit, or both, to justify continued inclusion in the scheme. The same principle ought to apply in relation to Shankill and its environs.

The following is clear as regards the graphs presented in this Section of the EIAR, see Figs 10, 11 & 12.

- a) It is clear from Fig 10 that Section 3 and Section 4 of the scheme coinciding with Shankill and environs has the lowest Peak Hour passenger volumes of any section of the scheme and the lowest absolute increase in passenger numbers between the Do Minimum and Do Something Scenarios,
- b) Fig 11 demonstrates that the time savings as modelled would appear to be very modest along the 3.3km section from Wilford to Loughlinstown Roundabouts – Chainages approximately 1,100 to 4,400 – 2028 Scenario – Inbound AM Peak'
- c) Fig 12 shows that for the outbound PM Scenario, the Do Minimum and Do Something lines are parallel along the sections of route coinciding with Loughlinstown to Wilford Roundabouts – indicating that little or no journey time benefit is being derived along this section arising from the Do Something intervention.

As stated above, disaggregated figures and graphs should have been provided to allow the reader and the Board to determine what if any journey time and passenger number benefits derive from the different sections of the project. Based on the

cursory analysis above, it seems quite certain that little if any benefit derives from the enormous impact that would occur in Shankill and its environs due to the Do Something interventions.

Costs

I have been unable to identify up-to-date 2023 costings in the documentation provided as part of this Strategic Infrastructure Development application. I will therefore only reference the costings information provided in the Concept Design for the Bray to UCD CBC Feasibility and Options Report, dated December 2017. While the absolute costs will have increased very significantly in the intervening six years, the relative costings ought to be largely similar.

The preliminary cost estimates for the sections from Bray to UCD are given as follows:

	Construction	Land	Total
Bray to Bray North	€4m -€5m	€10m	€14m - €15m
Bray North to Loughlinstown	€10m - €12m	€14m	€24m - €26m
Loughlinstown to UCD	€9m - €11m	€2m	€11m - €13m
Total Bray to UCD	€23m - €28m	€26m	€49m - €54m

Can it be right to spend €24m - €26m (in 2017 prices and presumably much larger now) that would destroy the streetscape of Shankill Village and the unique wooded character of its northern and southern approaches, whilst delivering little if any benefit to the overall scheme?

Moreover, taking the higher figures, can it be justified to spend 48% of the total price for this scheme on the 3.3km between Wilford and Loughinstown roundabouts, achieve so little in term of traffic and transportation benefits, while simultaneously destroying Shankill. Of course it cannot!

Conclusions

I am aware from the documentation provided that in the previous Public Consultations, the number of responses from the community in Shankill dwarfed the numbers from all other sections of the proposed route. That in itself must have given a clear message to the National Transport Authority as to the concerns of the community. While I acknowledge that the NTA has attempted to mitigate some of the worst effects of their proposals in Shankill Village, in reality the consequences to Shankill and its environs of their proposals are so horrendous that really their efforts amount to “moving deck chairs on the Titanic”.

In summary, as outlined above the Scheme is flawed in a variety of ways:

1. It doesn't accord with the requirements of the EIA Directive in respect of reasonable alternatives; in fact it looks as if the exercise of “route selection” was written with a pre-determined outcome, given that an unavailable reservation along the east side of the M11 formed the basis for three of the five routes considered. In addition, a viable possible route within the M11 reservation was previously not even considered and now a new scheme along this very alignment is in prospect.

This has to beg a further question – how many bus lanes are required around Shankill? And how much does the tax-payer need to shell out in order to pay for the misdirected objectives of the NTA?

2. The proposed scheme contravenes objectives in the Dun Laoghaire Rathdown County Development Plan,
3. The documentation is self-contradictory in respect of proposals at the most sensitive locations in Shankill,
4. The EIAR analysis of the impacts on Shankill and its environs does not capture the absolute devastation that the proposed development will have on the southern and northern approaches to the village, and all for what? – so that maybe a minute of journey time can be saved on average, with a reduced standard deviation.
5. The Traffic and Transport analysis is completely non-forthcoming as to reduction in the quoted benefits (average time savings, improved reliability and improved numbers of customers) that might arise if one were to remove Section 3 from the scheme. It is incumbent on the Board to explore this matter with NTA,
6. From the cost information that I can discern, the cost of the proposed interventions at Shankill are out of all proportion to the benefits deriving from these interventions and per kilometre well in excess of the costs per kilometre elsewhere on the scheme. It represents very bad value for the taxpayer,
7. Finally, the practice of the Board not holding Oral Hearings in respect of other BusConnects schemes cannot be sustained in the case of the Bray to City Centre Scheme. There are far too many issues that have been inadequately addressed by the submitted documentation for these matters not to be addressed in an Oral Hearing. I believe that not to hold an Oral Hearing would be undemocratic and would, I expect, trigger an application for judicial review.

Yours sincerely

Conor G. Maher

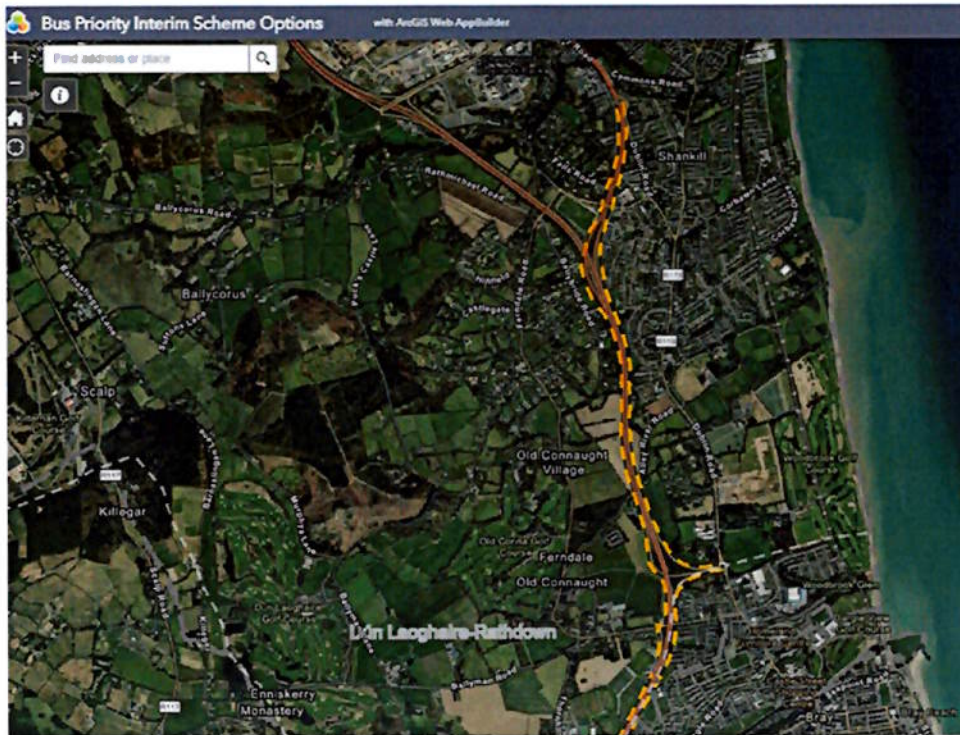


Fig 3



Figure 4

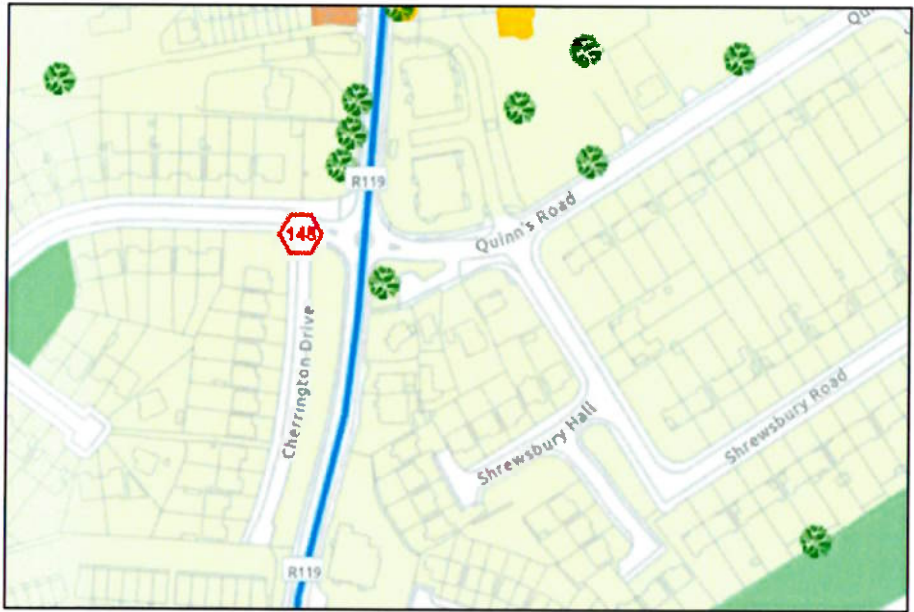


Fig 5



Fig 6



Fig 7

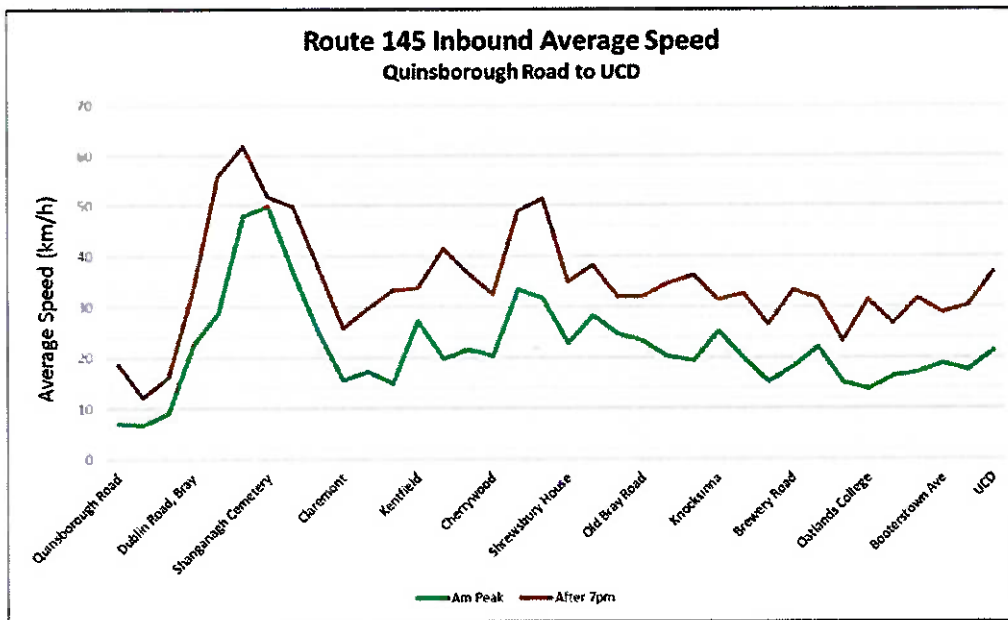


Figure 8.3 Existing Inbound Average Speed

Fig 8

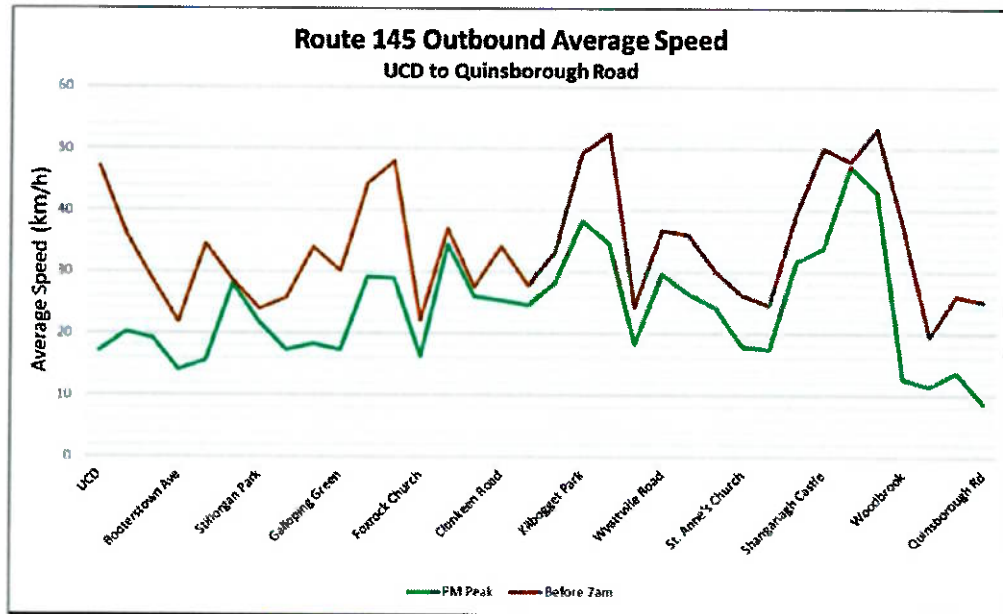


Figure 8.4 Existing Outbound Average Speed

Fig 9

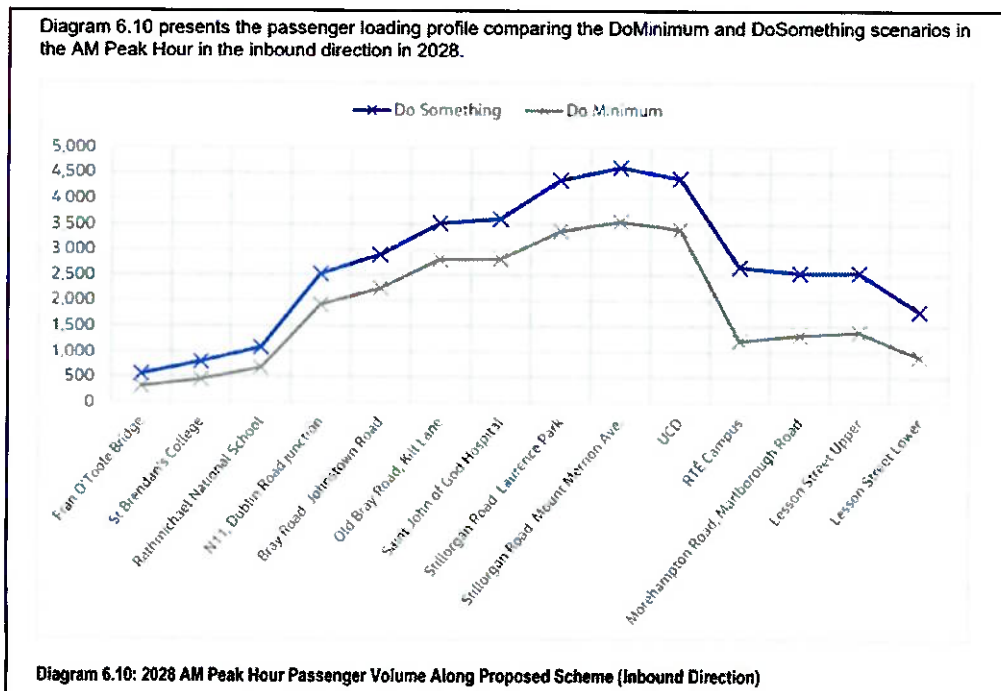


Fig 10

A comparison of average Do Minimum and Do Something journey times for the inbound E1 service are also illustrated in the cumulative time-distance graphs shown in Diagram 6.15 to Diagram 6.18.

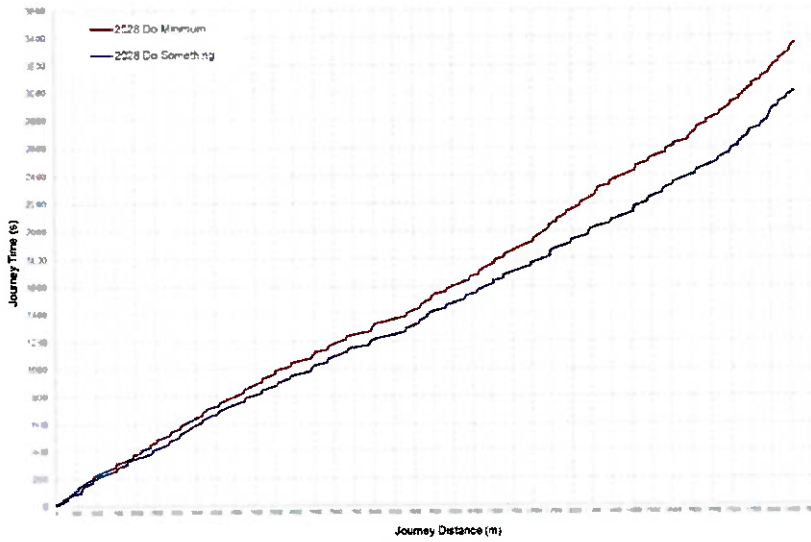


Diagram 6.15: E1 Bus Journey Time (2028 AM, Inbound)

Fig 11

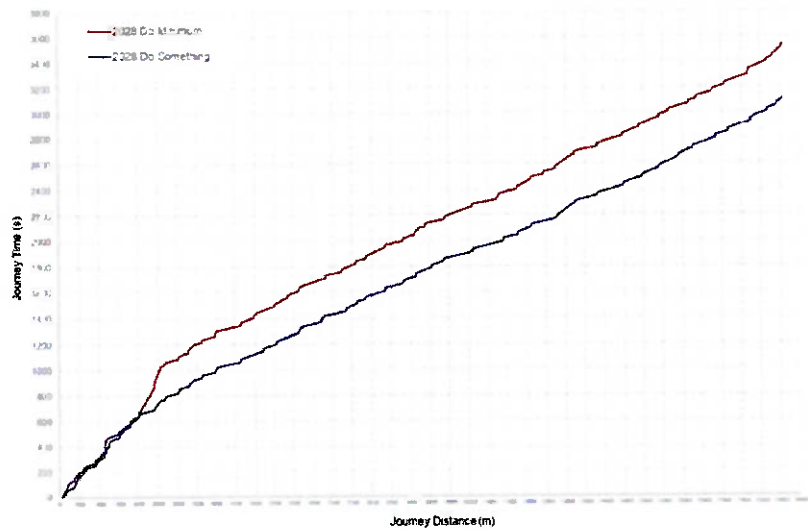


Diagram 6.20: E1 Bus Journey Time (2028 AM, Outbound)

Fig 12