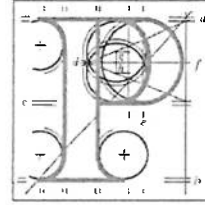


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Courtenay Pollard
49 Woodbank
Shankill
Dublin 18
D18 EF22

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.

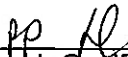
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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

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D01 V902 D01 V902

49 Woodbank, Shankill, Dublin 18, D18EF22

An Bord Pleanála
Strategic Infrastructure Division
64 Marlborough Street, Dublin 1
DO1 V902

Submitted online.

Subject: Objection to the Order & Bus Connects Plans for Bray to City Centre Core Bus Corridor Scheme

28th September 2023

Dear Members of An Bord Pleanála,

I am writing to express my strong objection to the proposed Bus Connects plans to the Bray Bus Corridor, which I believe to be unsustainable and detrimental to the community's welfare, livelihoods and the environment. As a concerned resident and advocate for sustainable transportation solutions, I feel compelled to voice my concerns regarding this matter.

Firstly, I feel that the current bus service is excellent, and our family has no issues with delays. I feel that it is evident that the proposed Bus Connects plans do not adequately address the current and future needs of the community and businesses in the village of Shankill. The lack of comprehensive research of our roads today, infrastructure, traffic flow, analysis of our pedestrian and cyclists travel habits, and any adequate consultation raises serious doubts about the viability of these plans.

The proposed plans fail to consider the voice and needs of the community and the detrimental environmental impact to Shankill's trees, flora and fauna. As we strive to combat climate change and reduce carbon emissions, it is crucial that we prioritise sustainable transportation options. This is agreed; however, the current plans do not demonstrate a commitment to this goal or indeed to current national, regional and local government policies.

Additionally, the lack of adequate community engagement and consultation throughout the planning process is deeply concerning. The residents of Shankill not only deserve to have their voices heard and their concerns addressed but are legally entitled to do so. It is essential that any transportation plans for the area are developed in collaboration with the community, ensuring that their needs and preferences are considered.

In light of these concerns, I strongly urge An Bord Pleanála to reconsider the proposed Bus Connects plans for Shankill. I believe that a more sustainable and community-oriented approach is necessary.

The current route selection was made 6 years ago in 2017 so comprehensive studies are needed to assess the current and future needs of Shankill as of 2023. Not least the fact that the plans for the M11 bus corridors is now in progress.

I kindly request that you take our multiple objections into serious consideration and take appropriate action to address them. I am confident that by working together, we can develop transportation plans that are truly sustainable and beneficial for the people in Shankill and our environment.

Thank you for your attention to this matter.

Yours sincerely,

Courtenay Pollard

Email: [REDACTED]

Mobile: [REDACTED]

Gavin Doherty

Email: [REDACTED]

Mobile: [REDACTED]

Alexa Doherty

Harrison Doherty

[Objections and Observations below:](#)

Biodiversity & Environmental Impact

This proposed plan will see a conservative estimate of 420 mature trees felled and a vast number of hedgerow destroyed. I draw your attention to the facts and the science that this will negatively impact people's health and wellbeing.

Air pollution is a growing environmental threat, with rising global emissions threatening ecosystems and human health. Poor air quality has become a major cause of premature death and illness and is the largest environmental health risk (Gakidou, 2017; HEI, 2018; Lim et al., 2012; WHO, 2016, 2014). Poor air quality is responsible for approximately 1 in 9 deaths worldwide (WHO, 2016). In 2015 alone, 422,000 people across Europe died from illnesses caused by exposure to outdoor air pollution (HEI, 2018).

In Ireland, 1180 premature deaths in 2018 were caused due to poor air quality (EPA, 2019). The country's main anthropogenic sources of PM_{2.5} are road traffic and the burning of solid fuel for home heating (EPA, 2019). Road traffic in particular accounts for up to 73 % of particulate matter levels (GLA, 2006). Particles caused by vehicle traffic include resuspended particles of tire rubber, brake dust, and diesel exhaust particles that result from incomplete combustion (Yanosky, Tonne, Beevers, Wilkinson, & Kelly, 2012; Basu, Alam, Ghosh, Gill, & McNabola, 2019).

Urban trees influence local air quality by altering the deposition and dispersion rates of pollutants. Trees can act as a barrier between the pollutant source and the receptors. Based on the standard k-ε based computational fluid dynamics model, Hong, Lin, and Qin (2017) found that the pollution concentration can be reduced up to 85 % due to trees located close to the pollution source.

On the same topic of **tree felling and destroying mature hedgerows**, I bring your attention to the current South Dublin County Council policy called **Living with Trees** whereby the mission is to:

“expand the tree canopy in the County to combat Climate Change. Trees act as carbon sinks, storing carbon as they grow, reducing carbon dioxide (CO2) in the atmosphere and thereby reducing Climate Change impacts, which is central to our Climate Action Plan objectives. Many trees are long-lived, offering enjoyment and a range of benefits to residents both now and in the future. They make a huge contribution to the urban landscape, enhancing the quality of life for people living, working and visiting the County”.

Planting some new saplings does not equate to the loss that will be derived from the felling of such a huge number of mature trees and destruction of miles of well-developed hedgerow. The council states that “It is extremely difficult to get new trees established in the urban environment with the increasingly dry summers, hostile ground conditions, competition with services in the street and vandalism “ “existing trees are a valuable amenity and need to be retained”

Facts about the vital significance of hedgerows, reference: Dun Laoghaire Rathdowns’ Biodiversity Education programme Plan

“Hedgerows are a vital component of Ireland’s biodiversity. They act as wildlife corridors by connecting green spaces to each other, allowing animals that would not normally go out in the open to move between them. For example, many species of butterfly use hedgerows rather than crossing open fields. **Ireland has lost the majority of its original woodland through deforestation.** Most of Ireland’s trees are now found not in woodland but in hedgerows. In many cases, the tree dwelling animals of Ireland, such as Squirrels, Pine Martens and many species of birds, must make do with hedgerows instead of woodland.

Therefore, we must protect our remaining hedgerows. The species composition of a hedgerow is very important. A hedgerow with a diverse plant community in turn supports a diverse and bustling animal community. Different species of plant produce berries, nuts and leaves at different times of year. So a greater variety of plants in a hedgerow provides food for birds, mammals and insects for a greater portion of the year. Most hedgerows are composed of a mix of low growing trees and shrubs, with occasional tall mature trees rising above and, at the bottom, wildflowers, grasses and ferns. The dense shrub layer of a hedgerow includes species such as Hawthorn, Holly, Blackthorn and Elder. These species all produce fruits that feed our wildlife, but they also offer shelter to birds and small mammals. Many birds often build their nests in the dense foliage near the top of these shrubs and low growing trees. Dunnocks, Robins and Wrens use the base of the hedge for shelter while they are foraging for insects. In fact, the shelter of a hedgerow often keeps the ground beneath it free from frost, so these birds can still feed there in Winter while the fields are frozen”.

Large concentration of bats & presence of black headed gulls and herring gulls in Shankill.

Fact: Eleven species of bats occur in Ireland (of which nine are resident) and all are protected under both national and international law. I bring to your attention the legislation relating to bats in Ireland and indeed the EU.

1.2.1 Wildlife Act 1976 In the Republic, under Schedule 5 of the Wildlife Act 1976, all bats and their roosts are protected by law. It is unlawful to disturb either without the appropriate licence. The Act was amended in 2000. **1.2.2 Bern and Bonn Convention** Ireland has also ratified two international conventions, which afford protection to bats amongst other fauna. These are known as the 'Bern' and 'Bonn' Conventions. The Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1982), exists to conserve all species and their habitats, including bats. The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, enacted 1983) was instigated to protect migrant species across all European boundaries, which covers certain species of bat. **1.2.3 EU Habitats Directive** All bat species are given strict protection under Annex IV of the EU Habitats Directive, whilst the lesser horseshoe bat (*Rhinolophus hipposideros*) and greater horseshoe bat (*Rhinolophus ferrumequinum*) are given further protection under Annex II of the EU Habitats Directive. Both are listed as a species of community interest that is in need of strict protection and for which E.U. nations must designate Special Areas of Conservation (SACs). The latter is only known from two records and no breeding populations have been recorded to date. The former are a species of the western seaboard of Ireland and have not yet been recorded on the east coast. **1.2.4 Eurobats** This is a Europe-wide (and neighbouring jurisdictions including North Africa and the Middle East) agreement that originates from efforts to apply the Bonn Convention to the protection of bats within areas to which they may migrate from their European summer or winter sites. There are 33 parties (including Ireland) that have entered into a UN forum to protect the 52 species of bat (based on current knowledge) of Europe. **6 1.2.5 Irish Bats** Eleven species of bat.

Question? It has been confirmed that rare species of bats and bat roosts are present in the Shankill area. Have An Bord Pleanála prepared information in relation to this, and has a bat specialist been appointed to undertake an assessment of the area?

Black headed gulls and herring gulls are an amber listed species and their home is a site which is subject to substantial tree loss. These will be displaced by the route currently proposed.

Community, Schools and Businesses – Wellbeing, safety & Livelihoods concerns

I further challenge the unsustainable and damaging plans for Bus Connects in this area as they pose a serious threat to the safety and wellbeing of the people and businesses in the area.

As a mother of 2 primary school pupils, I am extremely concerned that commuting by foot and as cyclists will be perilous. Bus Connect plans for Shankill far exceed the government policy for compact growth and indeed will pose a threat to people's safety.

Traffic flow and increased bottlenecks are also a major cause for concern.

Here are but a few points that highlight these:

1. Replacing roundabouts with traffic lights? Is this even legal? The diameter of the roundabout at St Annes Church for example. Replacing roundabouts with traffic lights. See – Volume 3 Chapter 4 Planning Application for dimensions of roundabouts. There is also a low traffic volume here at St. Annes – does this not qualify to the legal argument to retain the roundabout here.
2. The plans for Corbawn will cause huge disruption and will stop people using Shankill village and the businesses severely impacted as a result.
3. The majority of buses will be Bray-Dublin-Bray and priority will be given to North/South lanes traffic from Corbawn / Shanganagh direction causing considerable delays getting through the new proposed lights coming into the village. Residents from Quinns Road will be adversely affected by this also, causing delay and bottlenecks.
4. The proposal lacks concern for the safety of cyclists. The Bray approach will involve two road crossings (to accommodate direction of commuter cyclist through Shanganagh park).
5. The closing of the road at the top of Corbawn Lane and the reopening right turn on Beechfield Manor (tail backs?). All roundabouts are being replaced by lights with bus priority, resulting in tailbacks and people making dangerous u turns!

Return on Investment

The cost in relation to the benefit is absurd, the expense that will be attributed to this bus connects plan is nonsensical. The minimal reduction in journey time for the millions of euros it will cost is a waste of tax payers money, and more sensible improvements could be made in a variety of different ways. One excellent and valid example is the plans **currently** underway to put bus lanes on both carriageways of the M11. The question of where the time saving is actually being made should also be clarified. Is it due to this bus connects plan in Shankill at all?

Government Policies & Legal Adherence

I would also like to re-iterate that the Government of Ireland's policy prioritises.

“major projects which provide for local bypasses and compact growth in Ireland's towns and villages”,

and Eamon Ryan's comment that:

“A priority for the Government is to advance safe, clean, liveable towns and communities. This investment will help to take heavy traffic out of our main streets, giving towns back to residents and shoppers. It will also provide scope for greater Active Travel options (walking and cycling) in town centres. Reduced traffic volumes will allow for “compact growth” in town centres, providing possibilities for residential development. For that reason, we will see a renewed focus on supporting local by-passes.”

This bus connects plan is in direct contravention to these points.

Finally, it is imperative that along with all of the above points that any plans are legally sound. As it currently stands, I believe this not to be the case – and while there are many points to demonstrate this, the below are just some:

1. There has not been adequate consultation and this is in direct convention to Aarhus Convention. **We must insist on an oral hearing.**
2. The CPO has not disclosed accurate enough information relating to where they precisely wish to take land.
3. The presence of bats, gulls and other wildlife, and the negative impacts of losing mature trees is being disregarded.
4. Roundabout removals, versus the need for same, volume of traffic and dimensions, is being overlooked.
5. The look and feel of our community will be decimated, for a plan that is prohibitively expensive and just not required.

Thank you.

Courtenay Pollard, 49 Woodbank, Shankill, Dublin 18, D18EF22

