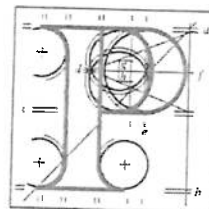


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Fr. Michael O'Sullivan SAC, PP
c/o The Resource Centre
Dublin Road
Shankill
Dublin 18
D18 VH64

Date: 17 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.

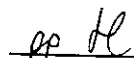
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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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Submission from

St. Anne's Parish Shankill

Fr. Michael O'Sullivan SAC, PP.
c/o The Resource Centre
Dublin Road
Shankill
Dublin 18.
D18 VH64
Telephone: [REDACTED]
Email [REDACTED]

This submission is in response to the Compulsory Purchase Order 2023 re:

Plot list: 1095(1).1i,1095.2i,1095(3).2i

Dated 10th August 2023. This submission also includes some more general points relating to the impact of the BusConnects13 proposals as they affect the Shankill environment and the improvements or otherwise of the flow of buses through the village. This more extensive discussion will demonstrate that there is no need to activate the CPOs as they affect St. Anne's Parish Shankill.

St Anne's Church serves the whole of the Shankill area: Bordered by the sea to the East, Wilford Roundabout and Old Conna to the South, Rathmichael Road to the West and Brides Glen, Commons Road and Rathsallagh to the North. Such a large area means that many of those who attend services in the Church or make use of the facilities of the Resource Centre which are widely used by the larger community, must use their cars for access. The local schools which also serve this large area have very limited access for cars so that many families make use of the church car park to drop and collect their children. Currently the park has 76 spaces but this will reduce to 50 if the BusConnects13 proposals are implemented. St. Anne's is also the chosen place for many funerals which frequently cannot be fully accommodated within the presently available parking.

Although in general the removal of parking places to encourage the use of public transport is entirely to be approved it must also be recognised that certain facilities by their very nature require access by private transport. In the case of funerals people come long distances, and in many cases at the end of the service they will travel with the family to the grave side for the interment and then on to a social venue for emotional recovery. The vast majority of this traffic can be replaced neither by public transport nor by taxis.

Shankill has, this year, won a gold award in the Tidy Towns competition. When St. Anne's was built in 1933 it was carefully oriented symmetrically within the triangular space between the Dublin and Shanganagh Roads which border it, in order to enhance the very striking perspective as viewed from the bridge. St. Annes is a protected structure and that protection includes its curtilage so we take a very jaundiced view of the proposal to seriously damage a carefully thought out landscape and building totality which has been in place and admired for 90 years.

Observation of the traffic flows on the roads bordering St. Anne's and on the roundabout, make it clear that the traffic moves very well with only limited hold ups for short periods of time during the morning and evening rush hours. It is also clear that at all times buses hold up cars and not vice versa.

The above observations make clear:

1. The loss of 21% of our car parking spaces will cause more frequent overflows and roadside parking with the attendant interference with traffic flows.
2. The land take covered by the above proposed CPO would seem to be totally unnecessary because the traffic flows very well through the roundabout as is, and if, as suggested, traffic lights are installed the flow through the system will be substantially slower than at present.
3. In our view, based on observations of traffic movements throughout the day, there is absolutely no reason to take church lands and put two traffic lanes to enter the junction on the Dublin Road. Traffic counts show that the Shanganagh Road carries two thirds of the traffic from Shankill Village and 20% of the traffic from Dublin Road.
4. If the overall aim of the BusConnects project is to improve the bus movements the most effective way would be to improve the ticketing system to allow the checking of tickets while passengers are waiting at the stop so that they could simply walk straight onto the bus. This system operates on the DART and Luas services. Luas and DART have roving inspectors checking tickets and observations show very few people travel without a valid ticket.
5. It appears from the plans that all traffic in and out of the entire Corbawn area will be routed past Beechfield Nursing Home with Corbawn lane becoming, in effect unusable, and redundant. This greatly increased traffic flow past their windows is far from ideal for people in the terminal stages of life when peace and quiet are a fundamental need.
6. Shankill remembers all too well the chaos caused when a traffic system similar to the one proposed here, was tried ten or fifteen years ago, it lasted for a year and was then reversed to the status quo ante with Corbawn Lane once again taking traffic in both directions

Since there has been no public engagement with the residents of Shankill on this scheme, as required by the Aarhus Convention, it is impossible to fully understand the basis on which the massive changes proposed for Shankill are based. Although there is no evidence to suggest this, it is possible that the suggested BusConnects13 plans are really being designed for Shankill's requirements in 20 or 30 years' time. Should that be the case then there is a requirement to incorporate what by then is expected: that the Luas, [by then probably a metro with substantially greater carrying capacity], will have been extended from Bride's Glen to serve Shankill and through to Bray. If the BusConnects system across the city, combined with Luas and DART improvements, is successful, we would anticipate a substantial reduction in road traffic within the next 20 years or so, calling into question any need to alter the road system in Shankill. Particularly at such disruption and expense. The destination for any traffic coming through Shankill should either be Shankill itself or places which can only be reached via Shanganagh Road all other traffic should be routed via the motorway. This should happen now.

The principle weakness of the BusConnects13 proposal is that it is being designed in isolation from the other transport systems operating in and around Shankill

It is recognised that the roundabouts at St. Anne's and at Quinns Road are difficult for bicycles at present. The optimum way to deal with this problem is to design a proper cycleway separate from vehicular traffic. In the interim, to put speed bumps at the entry to the roundabouts would produce a significant decrease in anxiety and increase in safety for cyclists, especially children.

Over the last 30 years the tree cover in Shankill has improved very substantially due to the untiring work of Tidy Towns, Crann and DunLaoghaire County Council. Many of the old, mature trees go back to inspirational plantings, which received a Gold Medal from the RDS some 250 years ago, to have a number of these historic trees either removed or damaged is not acceptable

to the residents of Shankill. Not least because there is no discernible benefit for Shankill or the overall efficiency of the current 145 and 155 bus routes from the proposals. The second aim of the BusConnects project is stated to be: to make a contribution to the national Climate Action Plan and is required also by the legal frameworks responding to the climate emergency. The removal of a large number of trees, especially mature ones is entirely contrary to the Country's necessary climate response. Planting young replacement trees leaves a gap of many years before the carbon sequestration rates recover.

It is not possible from the new maps of the proposal to make any serious estimate of either the number or the identity of the trees to be felled. This is entirely unacceptable.

St Anne's Parish is engaging fully with the demand by the Irish Bishops Conference that 30% of Church Land be given over to Biodiversity and wilding by 2030. The removal of the hedge along the Dublin Road and a substantial swathe of grass with the probable loss of mature trees either directly or by root damage pushes us in entirely the wrong direction.

The overall conclusion is that traffic, especially buses, flow very easily through Shankill at all times. Provided that the integrated BusConnects system is completed, Luas and DART are upgraded as expected there will be a reduction in road traffic, that is certainly the intention of the Irish Government. The present proposals with their serious effects on the environment and biodiversity of Shankill will contribute nothing to the overall effectiveness of Public Transport and may well make it worse. An improved ticketing system would make a much bigger contribution to efficiency and speed than the major road works and environmental damage proposed here.

On the above information we entirely reject the necessity for the proposed CPOs