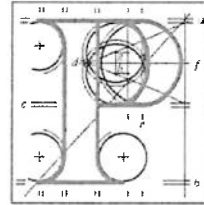


Our Case Number: ABP-317742-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Jaime McKeown and Beatrice Journee
79 St. Annes Park
Shankill

D18CY52

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.

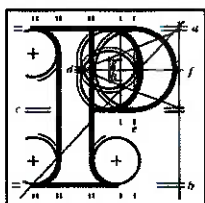
Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02

Tel	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



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

Jaime McKeown & Beatrice Journee

(b) Observer's
postal address

79 ST ANNES PARK
SHANKILL
CO. DUBLIN
D18 CY52

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal
address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

HA27.317742

- (b) **Name or description of proposed development**

BusConnects Bray to City Centre Core Bus Corridor Scheme

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Shankill, Co. Dublin (incl. stretch of R119 main road from Wilford Roundabout to Loughlinstown Roundabout)

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

While elements of the above mentioned proposals are to be welcomed, we object to the current proposals put forward by the National Transport Authority (as detailed at <https://brayscheme.ie/> and in the planning notice at <https://brayscheme.ie/wp-content/uploads/sites/11/2023/08/Newspaper-Notice-10th-August-2023.pdf>).

The proposals are excessive and disproportionate, essentially taking a costly and damaging infrastructural sledgehammer to crack a minor transportation nut.

The validity of the estimated savings in travel time has been questioned by locals and transport economists alike and the removal of roundabouts to be replaced by traffic lights alongside a closure of a key arterial route (Corbawn Lane) will only exacerbate the perceived issue and create tailbacks in and outside of peak hours. Driver impatience will inevitably lead to accidents, injury and worse. The plan will also limit Garda access to/from the Garda Station as well as emergency access into and out of the residential streets off Corbawn Lane.

Despite the clear feasibility of using the N11/M11 for certain services as evidenced by the N11/M11 Bus Priority Interim Scheme (see <https://n11m11bpis.ie>) and this being one of the initial route options put

5. Grounds

forward by the NTA and which had the backing of the community, this was dismissed by the NTA.

Simple alternative solutions exist along with utilising the N11/M11:

- Removal of a small number of carpark spaces and/or reallocation of wider footpaths to enable pull-in space for busses to allow passengers to embark/alight without holding up traffic behind the bus
- Provision of a local shuttle/feeder bus (electric powered) service running a circle route to connect passengers to core services at the Wilford and Loughlinstown roundabouts, Shankill DART and Cherrywood Luas, thereby limiting the number of large busses required to traverse Shankill and opening up other transport options

These follow the principles of sustainable development in the truest sense, being economically viable, socially acceptable and environmentally responsible.

The impact of the current proposals on the built and natural environment will also be a significantly damaging one given the land required and proposed felling of trees, drastically altering the sylvan character of Shankill Village, its approaches and the natural setting it enjoys between the mountains and the sea.

Only limited modifications are required in Shankill to sustain its existing excellent bus service. However as it stands, the overall impacts on Shankill, its community, visitors, flora and fauna do not justify the solutions put forward by the NTA which are wholly against the principles of sustainable

5. Grounds

development, contravening Dun Laoghaire Rathdown Council's Biodiversity Action Plan and proposed Tree Strategy.

We kindly request that the Bord now steps in to reject the current proposals and ensure the NTA revise its plans to take into account the unique problems posed by the plans to the Shankill community and demand that the NTA amends its proposals to ensure more sustainable and less destructive interventions are undertaken. This will prevent the unnecessary destruction of Shankill's character, heritage and biodiversity and instead ensure that minimal interventions, supported by the community and sympathetic to the environment, be considered and implemented to avail of existing infrastructure and opportunity to deliver an improved and safer transport infrastructure for all commuters, road users and pedestrians alike.

We also support the Shankill Community Action proposals (see also appendix one below), namely:

- The main Bray to City Centre Core Bus Corridor should follow the N11 between the Wilford Junction and Loughlinstown Roundabout, using the proposed N11/M11 Bus Priority Interim Scheme
- Express services to and from Bray, together with buses serving Greystones, proposed developments at Fassaroe and Old Conna and Park & Ride facilities on the N11 should use this corridor
- Limited improvements be made in Shankill to improve traffic flows and enhance the public realm and safe active travel, including an appropriate cycling network.

Thank you for your consideration of the above.

Jaime McKeown & Beatrice Journee

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Board to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

Shankill's Future: Award Winning Tidy Town or BusConnects Nightmare?

Submissions to An Bord Pleanála on the Bray Bus Corridor are due by Tuesday 10th October and Shankill Community Action intend to make a formal submission using appropriate expert advice. To do this, we need your support.

Please donate to our GoFundMe campaign.

<https://gofund.me/e9a409d9>



Donations will go in the first instance to the bank account of Shankill Tidy Towns. Any funds in excess of the costs of this campaign will be fully accounted for and used for improvements in Shankill.

A Community not a Bus Corridor

Shankill Community Action is a group representing local residents, neighbourhood groups, businesses and public representatives, and established community groups, including **SAGE** and **Shankill Tidy Towns**.

We support the BusConnects project in principle but propose that only limited modifications are required in Shankill to sustain its existing excellent bus service.

The current proposals will have a huge negative impact on the **community of Shankill** and **its environment**. They are expensive and unnecessary, given the plans to put bus lanes on both carriageways of the M11.

Shankill Community Action

Shankill Community Action challenges the unsustainable and damaging plans for BusConnects and seeks a balance between progress and preservation, in order to meet future transport needs while retaining **the unique charm of Shankill**.

The BusConnects proposals for Shankill are economically unsound, socially unacceptable and environmentally disastrous and contravene **DLR's Biodiversity Action Plan** and proposed **Tree Strategy**.

Shankill Community Action support alternative and more viable proposals which **maintain Shankill's excellent bus service**.

Keep Shankill Moving

Shankill Community Action proposes that:

- The main **Bray to City Centre Core Bus Corridor** should follow the N11 between the **Wilford Junction** and **Loughlinstown Roundabout**, using the proposed **N11/M11 Bus Priority Interim Scheme**.
- **Express services** to and from **Bray**, together with buses serving **Greystones**, proposed developments at **Fassaroe** and **Old Conna** and **Park & Ride** facilities on the N11 should use this corridor
- **Shankill's excellent bus service should be maintained**, with only buses serving Shankill and Bray going through Shankill - the **145, 155 and 45A** routes, and their proposed successor routes **E1** and **211**, **should continue through Shankill - not less buses!**
- **Limited improvements be made in Shankill** to improve traffic flows and enhance the **public realm** and **safe active travel**, including an appropriate **cycling network**.

Save Shankill's Bypass

A long-term resident of Shankill recently commented on how the M11 bypass made Shankill the community that it is today, A bus corridor through Shankill will undo the benefits of the bypass, at a time when Government policy prioritises **"major projects which provide for local bypasses and Compact Growth in Ireland's towns and villages"**.

Keep Shankill's Bus Service

Shankill currently enjoys an excellent bus service to Dublin City Centre. During weekdays, the 145 route, between Ballywaltrim and Heuston Station, operates every 10 minutes and the 155 route, between Bray Station and IKEA, every 20 minutes. That is 9 buses to and from the City Centre every hour. These buses typically pass through Shankill without significant delays.

When the proposed BusConnects are implemented, these routes will be replaced by the new E1 route from Bray Station to Ballymun. It is not proposed to increase service levels, so there is no reason to expect that there will be any particular delays, even with the existing road layout.

There could, however, be limited improvements which would improve traffic flows. Suggestions have included recessed and relocated bus stops, particularly for the Aircoach, and restrictions on right-turns while the Quinn's Road and Stonebridge Road junctions could be improved.

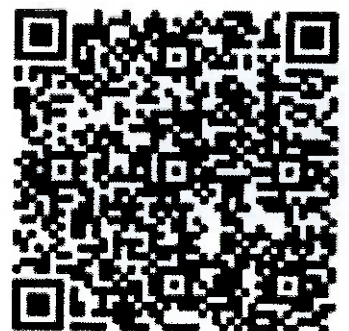
The proposed dedicated bus lanes will bring little benefit if the bottleneck at Bray is not dramatically improved.

Instead of these unnecessary bus lanes, which may also serve to increase car traffic through Shankill, consideration should be given to preserving the environment and improving facilities for cyclists and pedestrians.

Impact of Current Proposals

We recognise the need for improved access to quality transportation but the current proposals from the Wilford / Bray North Roundabout to Loughlinstown Roundabout will have a devastating impact on Shankill Village and the wider community:

- Destroying tree-lined approach roads,
- Closing off a key access route to Corbawn Lane,
- Replacing roundabouts with traffic lights,
- Creating further traffic tailbacks,
- Increasing risk of serious road traffic accidents and
- Endangering pedestrians and cyclists.



Save Shankill's Trees

Submissions to An Bord Pleanála

Groups or individuals wishing to comment on the BusConnects proposals may make a submission to An Bord Pleanála **no later than 5.30pm on Tuesday 10th October along with a fee of €50.** :

- in writing to An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902
- on their website: <https://online.pleanala.ie/en-ie/sid/observation>

As the Shankill Community Action submission is finalised, summaries and bullet points will be made available for use by anyone wishing to make their own submission. However, these are best done using their own words, as “cut and paste” submissions may be disregarded.

Public Meeting Woodbrook College

7.45pm, Tuesday 3rd October

Local Councillor, Jim Gildea, will hold a public meeting to give further details on the BusConnects proposal

Details of the Proposed BusConnects Scheme may be viewed at:

<https://brayscheme.ie/>

Proposals for bus lanes on the M11 may be seen on:

<https://n11m11bpis.ie/>



For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes