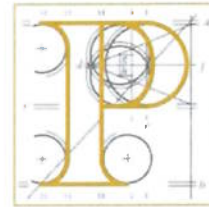


**Our Case Number:** ABP-317742-23



An  
Bord  
Pleanála

Professor Patrick Davey  
Ashdown  
Dublin Road  
Shankill  
Dublin 18  
D18 ET86

**Date:** 10 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 accept this letter as a receipt for the fee of €50 that you have paid.


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](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

Teil  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Riomhphost

Tel  
LoCall  
Fax  
Website  
Email

(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoibhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

**Teil**  
**Glaio Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Riomhphost**

**Tel** (01) 858 8100  
**LoCall** 1800 275 175  
**Fax** (01) 872 2684  
**Website** [www.pleanala.ie](http://www.pleanala.ie)  
**Email** [bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

# OBSERVATIONS RELATING TO: BUSCONNECTS13 PROPOSALS FOR SHANKILL, CO. DUBLIN.

This Observation is presented by:

Professor Patrick Davey  
Ashdown  
Dublin Road  
Shankill  
Dublin 18.  
D18 ET86.

Tel: [REDACTED]

Email: [REDACTED]

Joined by:

Justin Kilcullen,  
Chair,  
SAGE, [Shankill Action for a Green Earth]  
c/o St. Anne's Resource Centre  
Dublin Road  
Shankill  
Dublin 18.  
D18 VH64



## Preamble

Shankill is a community which has seen great changes and development over the last forty years. Changing from being a small rather isolated village to a large mixed community with very extensive estates, both private and social housing. All this has been accomplished while, in many ways, retaining the ambiance of the small-community village it once was.

The maintenance of the village community is evident in the range and mix of social activities within the village and particularly in the attendance at St. Anne's Church where a recent survey of Parish activities from Sallynoggin to Shankill clearly demonstrates that Shankill exhibits a breadth and depth of engagement not shown elsewhere.

The fact that Shankill retains a strong and unique social coherence is due in significant part to the structural integrity of the village, the relative sensitivity of the developments that have taken place so far and the enormous pride that the village has in its biodiversity, tree cover and green spaces.

## General introduction.

My name is Professor Patrick Davey. I write not as a traffic engineer but as a biochemist. My training and professional life have been looking at complex integrated systems and the flows through and between them. I am making this submission on my own behalf but also on that of SAGE: Shankill Action for a Green Earth, signed By Justin Kilcullen, Chair person,

The overall purpose of the BusConnect scheme is:

**“To greatly improve the bus services in Irish cities. It is a key part of Government Policy to improve public transport AND [my emphasis] to address Climate Change in Dublin and other cities across Ireland.**

As we will see little of those core requirements are found in the proposals being currently presented for Planning Approval.

This “Observation” relates primarily but not exclusively to the system of junctions 37,38 and 39.

I made observations relating to junctions 38 and 39 at a previous stage of the planning process. As a consequence of that earlier intervention I was contacted by one of the NTA engineers and we had a long discussion. However, as we seemed to be getting nowhere I asked whether anyone from the NTA had visited Shankill, had walked the streets, spoken to residents or, most importantly, observed, on the ground the actual working and flow of the traffic. The answer was one of amazement that I would ask such a silly question, the answer, of course, being no. Hardly what is required of the Aarhus Convention. Consequently, as an experimental scientist I am able to put very little reliance on the figures and data as presented by the NTA. The answer to any comment I made to the engineer was: “Our model shows”. Unfortunately this immediately reminds one of the quote: “garbage in garbage out”. This view is strengthened by the total lack of information in the explanations accompanying the design sheets for each junction. In each case there is the statement that the figures refer to “peak times” but no explanation as to what this means, no dates, no day of the week, no time of day not even how long a peak time is, is it 30 minutes, 1 hour, 2 hours, a whole day? Without these figures the numbers mean nothing.

## Junctions 37,38 and 39.

These three junctions form an integrated system together with the pedestrian operated lights between junctions 37 and 38.

On the ground observation shows that currently traffic flows remarkably well except for short periods of 20 – 30 minutes between approximately 8.20 – 8.45 and 17.45 – 18.15. During these specific times the traffic on the roundabout may come to a halt for, at the most 1 – 2 minutes. These blockages are caused primarily by the traffic lights at junction 39 but also by the pedestrian lights on Dublin Road which are heavily used by school children on their way to and from St. Anne’s and Rathmichael primary schools on Stonebridge Road. There are also hold ups caused by traffic turning in and out of St. Anne’s Church carpark by parents collecting and dropping children who then walk the last 200m to school. Except at these times, the hold ups at the roundabout are measured in seconds, not minutes. An important general, ground based observation is that general traffic virtually never holds up a bus whereas buses regularly hold up cars. This is no problem as the stated aim of BusConnects is to improve public transport and address climate change which requires that private transport is replaced by public transport.

## The NTA plan to restructure junction 38.

The first and most significant point is that the NTA does not treat junctions 37,38 and 39 as a system but instead as isolated individual junctions.

Let us start with the traffic flow figures as given in the Bray Scheme website

People movement, Typical peak period. [Length and time of period unspecified]

	Junction 37	Junction 38	Junction 39
Car	2129	1541	2549
Bus	11760	7613	0
Walk	3456	2074	2074
Cycle	388	0	0

If we assume that a bus holds 60 and a car 1.2 persons, the above figures translate into the following vehicle numbers

	Junction 37	Junction 38	Junction 39
Car	1774	1284	2124
Bus	196	127	0
Walk	3456	2074	2074
Cycle	388	0	0

A number of points immediately stand out from these figures:

1. Since we have no idea what Peak Times mean We should assume the only meaningful figure would be per hour.
2. Buses: At least two buses on 45A route per hour use junction 39, Above the figure is given as 0.
3. If it were the case that there are no buses along Shanganagh Road, by definition that would mean that the buses through junctions 37 and 38 MUST be the same and should be 14 per hour if they are able to keep to the timetable.
4. From any cursory observation on the ground, it is obvious that cycles passing junction 37 must pass through junction 38 unless they come through the grounds of St. Anne's Church, as some children do, but then they pass through junction 39. So the two figures of 0 given for cycles make no sense.
5. The NTA may wish to suggest the figures they present, refer to the situation after the changes they propose, some of the numbers are too large by an order of magnitude unless their peak time is at least a day long, and others are presented as 0 when we know there is such traffic on the road. The numbers simply do not reflect reality.
6. Given the traffic flows we observe at present, the peak time figures [which we must assume are per hour] given on the NTA junction design sheets are between 3 and 4 times greater than we observe.
7. The figures for pedestrians and cyclist bear no relation at all to the actual numbers observed on the roads. The entire population of Shankill is less than 20,000 so to suggest that 30% are on the road at peak times is clearly wrong. The, [assumed, hourly] flow for cyclists would have been reached, briefly, on the day that the Tour de France came through the village.
8. Junctions 37 and 39 have pedestrian, at need, 'green man' crossing within the light sequence and junction 37 also has a traffic warden during school travel times. Junction 38 has islands on each of the approach roads and this system is well able to handle the low numbers of pedestrians that need to cross the roads at this point. The peak time for pedestrians would be before and after Mass in St. Anne's Church and these times do not coincide with high traffic density.
9. Conclusion: The figures as presented and used for modelling cannot by any stretch be used as a basis for a major, and very disruptive infrastructure project.

## Specific problems with the design proposed for junction 38.

It is proposed that the roundabout at junction 38 be removed and replaced with a set of traffic lights. These lights are to have a cycle time of 2 minutes which guarantees two minute delays for many of those entering the junction. Currently the delays are measured in seconds except at the busiest times for periods of 30 minutes or so. Thus a serious reduction in the efficiency of flow through this junction.

It is also proposed that Corbawn Lane be closed to traffic in an east direction with the result that all this traffic must travel north on Shanganagh Road and turn right at junction 39. Corbawn Lane and Beechfield are the only access routes to a large hinterland of housing estates. It is important for access of emergency services that Corbawn Lane is left fully open.

Corbawn Lane carries somewhere between 30% and 40% of the traffic on Shanganagh Road and bringing the westbound traffic into the middle of the queue waiting to enter junction 38 from Shanganagh Road will effectively make that route out of the Corbawn estates non viable and the vast bulk of that traffic can be expected to enter via junction 39. Thus putting approximately an extra 50% of traffic onto a section of the road which, according to the NTA figures, is already at 101% capacity in both directions.

This idea of partially closing Corbawn Lane was tried before and found to be such a disaster that it was reversed after a year of traffic jams.

### Overall conclusions:

1. It is clear that the figures on which the redesign of junction 38 is based are incoherent and cannot form the basis for a change of the magnitude proposed, particularly as it is clear that the changes will, in fact, lead to a substantial reduction in the efficiency of the junction.
2. Possibly the most effective action to reduce travel times, which would apply to all bus journeys, would be to install pre-journey ticket validation as is done on both DART and Luas lines. The general use of defined time for travel rather than defined route would greatly simplify this change. At busy times this would save between one and two minutes at many stops. Greatly in excess of the savings proposed in the current plans.
3. The most effective way of improving the throughput of the junctions 37,38 and 39 would be to leave the roundabout in place and to install traffic monitoring cameras and link them to the two sets of lights currently in place and the pedestrian crossing to ensure that the lights facilitated the flow of traffic away from the roundabout.
4. There is no need to do any road engineering except to facilitate an integrated system of cycle lanes.
5. It must be assumed that the rest of the BusConnects13 proposal for the Shankill area rests on equally shaky ground and needs to be completely redesigned.

As placed at the start of this observation: "The overall purpose of the BusConnect scheme is "To greatly improve the bus services in Irish cities. It is a key part of Government Policy to improve public transport **AND** [my emphasis] to address Climate Change in Dublin and other cities across Ireland".

1. In general the BusConnects13 proposal as it refers to Shankill claims that it needs to remove a very substantial number of trees which is directly opposed to improving Ireland's response to Climate Change and the Dun Laoghaire County Council Climate Change Proposals. Not only due to the adverse effects on Carbon sequestration but also to the reduced capacity to remove those pollutants responsible for causing asthma, particularly in children and also heart and lung disease. In general there are good quality studies which show the value of good tree cover to the local communities in both health and general wellbeing.
2. As stated at the beginning Shankill is a village which is intensely proud of its environment and objects most strongly to the extensive damage to our environment and biodiversity which the current BusConnects13 proposals will cause. These objections are particularly strongly felt because it is becoming absolutely clear that the proposals as currently formulated will produce no discernible improvement in the public transport serving the village, indeed a very significant reduction in the

service from 12 to 9 buses per hour and this at a time when it is becoming ever more clear that Ireland is failing to reduce its climate polluting gases fast enough to attain its legally established limits. This proposal is moving us in entirely the wrong direction: Removal of trees, serious downgrading of our precious environment and a reduction in the quality of our public transport and thereby encouragement for the continued use of private cars.

3. Although the stated purpose of BusConnects13 is to improve public transport and assist the attainment of Irelands legally established climate change goals, it appears that an unstated aim of these proposals is to facilitate car transport through Shankill. This is entirely counter productive for the two reasons underlying these observations: the damage to the environment of Shankill and the reversal of necessary climate change responses. Shankill should not be used as a means of bypassing the motorway M11, rather, through traffic should be actively encouraged to transfer to public transport and use the M11 if car transport is essential.