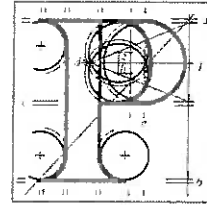


(F)

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

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Roy Parker  
3 Rathmichael Lawns  
Old Bray Road  
Shankill

D18E2Y3

**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](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

HA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

## Observation on a Strategic Infrastructure Development Application

To: An Bord Planala

Application Case Number: 317742

Name of Person Making Observation: Roy Parker

Address of Person Making Observation: 3 Rathmichael Lawns  
Old Bray Road  
Shankill  
Dublin  
D18 E2Y3

Date: 10 October 2023

1. The proposed bus corridor from Loughlinston Roundabout to the Wilford Roundabout should be on the N/M 11.

1.1 Transport Infrastructure Ireland (TII) have decided to locate bus lanes on the N/M 11 for buses to and from Wicklow/Dublin. It makes no sense to duplicate these bus routes by creating a parallel bus route through Shankill.

1.2 The TII route mirrors the Option 2A route considered by the NTA but dismissed without adequate justification over 6 years ago.

2. The environmental impact of the proposed scheme is unjustified by the perceived benefits of the scheme put forward by the NTA, particularly given the significantly less impactful alternative TII N/M 11 route.

2.1 The proposed scheme will involve the destruction/removal of over 400 mature trees and extensive areas of mature, established hedgerows along the Loughlinston Roundabout to the Wilford Roundabout route, with the consequent negative impact on climate, air quality, noise absorption, wildlife habitat and community amenity. As just two examples, the trees bordering Woodbank estate on the Bray/Dublin Road are over 100 year old beech trees and the hedgerows bordering Rathmichael National School are over 50 metres long.

3. The impact of the proposed scheme on the Shankill community is unjustified by the perceived benefits of the scheme put forward by the NTA, particularly given the significantly less impactful alternative TII N/M 11 route.

3.1 Shankill is a real, vibrant village with an active community life (Tidy Town membership, village based small businesses, old folks community centre, parish resource centre, community Scan magazine as examples) and not just a commuter belt. This is especially the case since the village was by-passed by the N/M 11. Introducing four traffic lanes will significantly increase traffic speeds and volumes and runs the risk of turning the village into an alternative 'motorway' for drivers avoiding the N/M11.

3.2 The proposed scheme prioritises commuters *through* Shankill over village residents wanting to travel *within* the village, particularly the proposal in the scheme to remove the St. Anne's Church and Quinn's Road roundabouts.

3.3 Parking in the village of Shankill, which is already somewhat limited, will be effectively precluded by the proposed scheme with the consequent negative impact for local businesses and elderly or disabled residents.

4. On any reasonable cost/benefit analysis, the negligible commuting time savings suggested by the the NTA as a benefit of the scheme are far outweighed by its negative impact on environment and community; the unavoidable bottlenecks at Shankill bridge and Bray bridge should alone be reason for refusing approval for the scheme, which cannot therefore provide the streamlined bus corridor being proposed.

4.1 Given that Shankill and Bray are scheduled to lose their current 155 bus service (one of only four buses currently serving these areas), getting a 'super bus corridor' with reduced bus services seems at best perverse, at worst an unjustified waste of public funds.