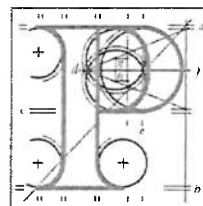


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Shane Gethings
18 Eaton Wood Avenue
Shankill
Dublin 18

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 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.

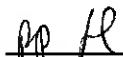
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

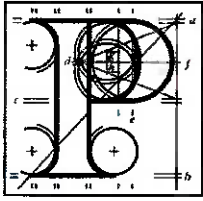


Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

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Glaó Áitiúil	LoCall	1800 275 175
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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

(b) Observer's
postal address

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

(b) Agent's postal
address

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)

Click or tap here to enter text.

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

BRAY SCHEME No 317742 (Bray to City Centre Bus Corridor)

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

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

Bray to City Centre

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).

Underling Data – Discrepancies and Bias

Having reviewed some of the many documents available for that have been used to outline the Bus Connects – Bray To City Center project it appears that these are written with clear bias. Documents that one would expect to be reasonably impartial are far from impartial and in cases may border on misleading.

In several instances there is missing key information and so, whether this is intentional or not, where there are missing pieces of information in one document there is almost certainly due to be additional missing information that may be relevant or not but without the confidence of accurate information observations are not fully informed. As such the entire set of data is called in to question.

Conceptually the Bus Connects plan makes sense however the question that I would raise is – Does the cost outweigh the benefits?

The assessment criteria for the entire route appears to centre around several key areas:

- Pedestrian infrastructure
- Cycling infrastructure
- General Traffic
- Bus infrastructure

Pedestrian Infrastructure

5. Grounds

As per the document: *Appendix-A6.1-Transport-Impact-Assessment.pdf Executive Summary* there are, admittedly, some improvements that would be felt in Pedestrian infrastructure however, the pedestrian journeys would account for approx. 6% of trips at peak times through to 2028 as per the many tables within section: **7.2.4.3 Peak Hour People Movement along the Proposed Schemes**

Cycling infrastructure

As per the document: *Appendix-A6.1-Transport-Impact-Assessment.pdf Executive Summary* regarding the cycling infrastructure pillar there would be a low positive improvement in sections 1,2 and 4. While in **Section 3 – Loughlinstown Roundabout to Bray North (Wilford Roundabout)**; which captures the Shankill area would be negligible

'The potential improvements to the quality of the cycling infrastructure will be Low Positive in Sections 1, 2 and 4 and Negligible in Section 3...'

As such, one of the primary justifications used to push forward the plan overall is in questions when viewed through the lens of Return on Investment (RoI) and specifically, there is little to no RoI in for **Section 3 – Loughlinstown Roundabout to Bray North (Wilford Roundabout)**.

Bus infrastructure

Due to public consultation the plan for Section 3 - **Loughlinstown Roundabout to Bray North (Wilford Roundabout)** excludes major modifications to Shankill Village. This means that the Village will retain its character. The plans remain unclear how the changes to Section 3 are contributing to the overall plan in terms of overall journey time savings and any reports appear to outline that there would be little gain. Overall, the plan will reduce end-to-end travel time by approx. 5.8 minutes overall during AM/PM Inbound travel by 2028. And 5.7 Minutes overall during AM/PM Inbound by 2043 (*Table 6.36: E1 Service Bus Average Journey Times (Inbound Direction)*) In fact the plan accepts that the benefits would only be felt beyond Stillorgan Park Road:

'Whilst modest benefits can be seen through Bray, Shankill and the southern half of the Stillorgan Road, these can be seen to increase beyond Stillorgan Park Road'

5. Grounds

The time savings on Outbound journeys are approx. 7 mins by 2028 and 2048. It is unclear where the specific time savings would be but it appears that Section 3 would not be contributing massively to time savings.

The reports appears to have performed some resiliency testing by modelling (6.6.3.3.5 *Increased Bus Frequency - Resilience Sensitivity Analysis*)

Resiliency tests adding an additional ten buses to Inbound and Outbound corridors in order to understand what impact this would have in 'Do Minimum' and 'Do Something' scenario. As per the impact assessment:

'The results indicate a negligible change in Do Minimum and Do Something bus journey times even with an additional 10 services operating per direction per hour along the corridor.'

The reports concludes from this (Highlighted in bold for emphasis):

'This highlights the benefit that the Proposed Scheme infrastructure improvements can provide in protecting bus journey time reliability and consistency, as passenger demand continues to grow into the future'

This is possibly one of the more exaggerated examples of bias. Where the report and underlying data concludes that there would be little to no difference in a model the report highlights this as a specific benefit and justification for the proposed scheme. My conclusion, and from attending several local area meetings on the topic I would suspect many residents would feel the same, would be that there should be as little impact as possible and the best RoI should be pursued. The resiliency test outlines that the number of buses could be increased by 10 with little downside by doing the minimum amount of work yet the test concludes almost the exact opposite without any justification.

General Traffic

As per the document: *Appendix-A6.1-Transport-Impact-Assessment.pdf* there are several sections relating to general traffic impact assessments. Specifically- 6.6.3.3.6.4 *General Traffic Impact Assessment*, which outlines the capacity at which key junctions operate, indicates that all key junctions will move to either 100% capacity or will be operating over 100% capacity at peak times. Even with this acknowledgement there is no plan for mitigation to known queuing and delays regularly

5. Grounds

going to be experienced. It appears that the threshold for where intervention would be required is when there would be a high negative impact:

*'Three out of the six junctions listed operate with a V / C ratio of above 100% in the Do Minimum scenario, therefore, the impact of Proposed Scheme is low or negligible and no further analysis or mitigation is required. **At the remaining three junctions the impact is Medium Negative therefore it is considered that no mitigation is required at these locations also'***

*'Two out of the three junctions listed operate with a V / C ratio of above 100% in the Do Minimum scenario, therefore, the impact of Proposed Scheme is low or negligible and no further analysis or mitigation is required. **At the remaining two junctions the impact is Medium Negative therefore it is considered that no mitigation is required at these locations also.'***

Again, there are several sections where bias is clearly demonstrated within the document. For Example:

*Given the improvements to bus priority, walking and cycling as a result of the Proposed Scheme, **there will likely be an overall reduction in operational capacity for general traffic along the direct study area. This may in turn result in some level of redistribution of general traffic away from the main corridor onto the surrounding road network.***

The report clearly calls out that there will be a reduction in overall capacity for general traffic. The redistribution of traffic is also guaranteed as per the reports and models. The language used above indicated that there is a possibility that there will be no impact when every report indicates the complete opposite in every model that was displayed within the report.

Overall, there are there is an argument to be made that the benefits may not outweigh the costs when integrating the data for the plan overall.

Bray/Shankill Specific observations

5. Grounds

Regarding Shankill there are specific observations that are worrying. Due to previous engagements through public consultation the heart of Shankill Village retains much of its character. It's worth noting that there are still fundamental issues that will affect the overall aesthetic a functionality of the village as a whole.

As outlined in the document: *Appendix-A6.1-Transport-Impact-Assessment.pdf Executive Summary* there is no indication of how much time will be saved between the Wiford Roundabout in Bray and the Loughlinstown roundabout at the N11.

The Impact assessment calls out that the real benefit would only be felt from Stillorgan Park. The route that has emerged requires the removal of the roundabout at St Annes Church. Part of this plan requires making Corbawn Lane and exit only road. The traffic issues that exist today will be exacerbated by this change. The regular flow of traffic to access the housing estates there is to enter via Corbawn Lane and proceed to the roundabout at Beechfield manor/Dorney court. Alternatively, if you are accessing Lidl the flow would be similar. This current flow allows for clearing the St Annes roundabout reasonably quickly.

The proposal now will mean that you can no longer proceed through Corbawn Lane. The traffic backs up on Shanganagh Road. The new plan would push even more traffic to Shanganagh Road which would cause further delays. This will affect the throughput of the busses proceeding through the village. This is obvious for residents of the area and it's surprising that the plan is being pushed ahead despite the obvious issues with traffic that it will cause at this location.

Additionally, the plan requires the removal of the roundabout Cherrington Road and Quinns Road.

This roundabout is used by residents who would proceed through the village and used this roundabout to u-turn to come back to the village for amenities use such as the shops, post office etc.

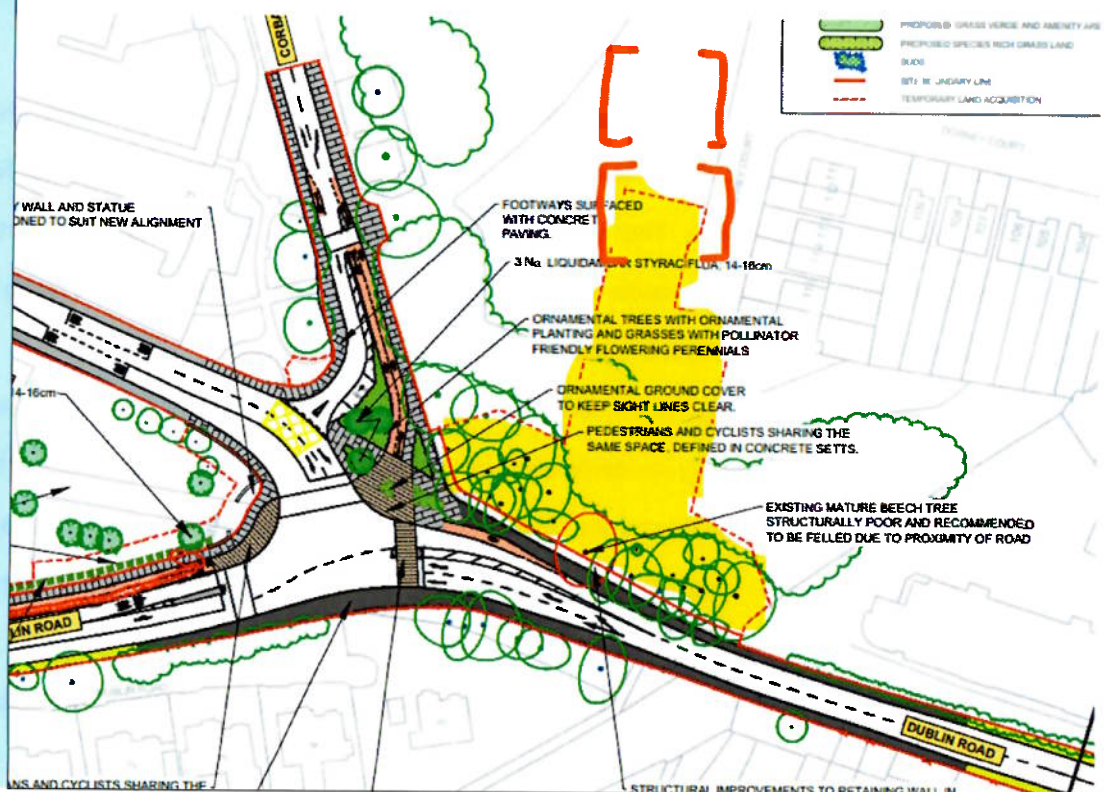
Again, it's obvious to residents that the removal of this roundabout would mean an increase in u-turns within the village area.

The removal of these roundabouts would supply little benefit to the overall plan and likely would adversely affect the throughput of busses.

5. Grounds

One of the most worrying points of the overall plan is the lack of specificity around removal and replacement of trees. In general the document: *Landscaping General Arrangement.pdf* does outline which trees will be removed, however, it does not outline clearly the maturity of the trees that will be removed. There is only some indication of canopy size but that is not an accurate representation of maturity. The removal of mature trees goes completely against biodiversity goals. The replacement trees would be young, immature trees and is not adequate. It is outrageous that mature trees are being removed for what may be a couple of minutes savings on the entire route and negligible cycling improvements.

Most worrying however is that the Landscaping plan is not accurate and is missing details around extremely mature trees. For example, there is a CPO order for land used during the construction that is missing many key mature trees. Bracketed in Orange:



5. Grounds



5. Grounds



For the avoidance of doubt, the only reason I can call out this specific area is because I live in the area and know it well. It is outrageous that there is a significant detail (specifically under the landscaping plans) missing from an area of land that will be under CPO. This has not been identified as far as the plans are concerned should those trees be felled there would have been no evidence from any of the site drawings that they ever existed. The standalone tree would be captured in the CPO however the cluster of 4 trees may not be. But again, it's not clear because none of them appear on the plans. This begs the question of what else has been omitted from the plans and when will that detail be finalized. Should there be items that are removed that were missing from the plan they cannot be replaced like for like who would be to blame and responsible for remediation?

Bus Route Assessment

One of the alternatives that was proposed previously would be to have a route along the M11/N11 bypassing Shankill in its entirety. At the time there was no further assessment on running busses through M11/N11. Today however there are plans to have a standalone bus lane on the M11. The assessment for the Bus Connects Bray/City Centre has not referenced that plan and as such the proposal may already be out of date and should be reviewed with respect to the N11 proposal:

<https://n11m11bpis.ie/>

5. Grounds

Additionally, there is good existing public transport from Shankill with existing buses and DART links. There will be a new DART station being built in Woodbrook which will alleviate some of the need to additional transport.

Summary

There is an argument to be made, both for and against, the RoI from the entire Bray/City Centre plan. Overall, there is a saving of a few minutes across the entire route when utilizing the entire line as an individual. Most of that benefit is from Stillorgan Park onwards on the inbound journey. There is some benefit entering Bray also.

There is additional benefit to cycling infrastructure, but they are a minority user of the route. Similarly, there is the most benefit to the pedestrians and they are the lowest percentage user in all models so RoI is, at best, questionable here.

Car users will suffer the most from this plan. There is zero benefit individuals who are required to drive and by every measure traffic will be worse in nearly every area.

The report is incredibly biased and there are instances where doing the minimum and doing something would net the same result but the report pushes for proceeding with the project regardless. Where there is a Medium negative outcome i.e. for affected junctions there is a recommendation that no mitigation is needed.

The logic being used is that a project with such excessive expense that is being incurred would result in Low or Negligible benefits should push ahead but instances where there would be Medium Negative Impact to a large amount of the general population requires no mitigation frankly beggars belief. This is very clearly a project that has not been fairly assessed. Reports that were used to inform the RoI were written with intentional bias and not a fair representation of the true benefit that may exist.

The most apparent lack of benefit comes at the expense of the Shankill area. Reports are missing of fundamental detail in the form of missing mature trees needs to be clarified ASAP and there should be

5. Grounds

another document outlining items that were missed and why they are being added in now. Any loss of trees should be deemed unacceptable. The replacement of mature trees with immature trees is unacceptable.

The reports should be re-examined while accounting for the current N11/M11 Interim plan which routes busses from Bray on an N11/M11 as I believe there would now be justification for leaving Shankill, it's roundabouts, trees, general layout and already adequate bus services given the N11/M11 plan and the addition of the Woodbrook DART Station given that the N11/M11 plan closely resembles a previously rejected proposed route.

The data previously assessed is now out of date. It would logically make sense that if you can route busses on the N11/M11 there should be a lesser requirement to have the same amount of busses through Shankill village where there is a known choke point and any time based savings that were made would be eroded. The existing roundabouts should be left as-is. There is no reason that current bus stops cannot be upgraded to include real time information, shelter and seating without having to perform major infrastructure project for upgrade. This would retain the existing flow of traffic which, while not perfect, is functional and maintains the aesthetic of the village and community.

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.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes