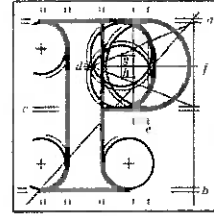


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Shankill Tidy Towns
c/o Eoin McBennett
Littlegrange
Stonebridge Road

D18 H0X3

Date: 11 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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Shankill Tidy Towns
In collaboration with Shankill Community Action
Observation to An Bord Pleanála
Bray to City Centre Core Bus Corridor Scheme 317742
October 2023

Submitted by: Eoin McBennett, Littlegrange, Stonebridge Road, Dublin D18 H0X3

Shankill

Shankill is a growing suburb of Dublin, beautifully situated between the mountains and the sea.ó

Dating from the late nineteenth century, the relatively young suburb of Shankill evolved as a community with low rise buildings, picturesque gardens, tree lined roads, stunning mountain vistas and attractive wooded areas and parks. A short walk from the seafront on Killiney Bay or from the wooded hillsides of Rathmichael and Carrickgollogan, Shankill is a very special place with a unique charm.

Shankill retains a village atmosphere with a rural aspect, emphasised by its woodlands and roadside hedgerows. It is a very pleasant place in which to live, with a great community spirit. There are numerous local sports clubs, great schools and many wonderful local amenities.

Trees have long been a major feature of the Shankill area. Peter Pearson, in his book, ***Between the Mountains and the Sea***, notes that a local landowner was awarded a gold medal by the Royal Dublin Society for planting and maintaining 38,000 trees, many of which are still flourishing.

Modern Shankill is unusual in that it has evolved relatively recently from a prosperous rural parish, noted for its many grand houses and fine granite walls, which remain a feature of Shankill today. The approach road from Bray is relatively unusual with granite walls on both sides of the road. Given its rural origins, the older public buildings of Shankill are spread over a very large area. In the late nineteenth century, land evictions in the area led to the emergence of a village, which became known as Shankill. In the twentieth century, this grew into a substantial community.

Today, its numerous parks and green spaces are a feature of Shankill. Many are linked, so that it is often easier to travel on foot between different parts of the community. The Dublin Mountains Way, a way-marked long-distance walking trail runs for 40 kilometres through the Dublin Mountains from Shankill to Tallaght. This route brings walkers to Rathmichael Wood, Carrigollogan, Barnaslingan and the Scalp. Beyond Glencullen, it crosses the Wicklow Way, connecting Shankill to both Marley Park and locations in Wicklow such as Roundwood and Glendalough. Other shorter walking routes link Shankill to Deansgrange, Cabinteely and Enniskerry, while the Bray Camino passes through on route to Killiney, Dalkey and the City Centre.

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 route changes are implemented, the 145 and 155 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.

Is a Core Bus Corridor through Shankill really necessary?

Shankill currently has an excellent bus service and is not subject to significant traffic delays, with the existing location of bus-stops on Main Street a major factor in any delays that do arise.

- As no additional buses through Shankill are proposed and there are no significant delays at present, why is this proposal being progressed?
- As current bus times through Shankill are similar to those that would be enforced under the proposed 30Kph speed limit, will there be any actual time saving?
- A factual, data-based, environmentally sound justification for the proposals is essential. No data or environmental or social impact studies have been provided, despite numerous requests.
- The NTA have not provided evidence that the proposed arrangements will result in any improvement in bus journey times through Shankill.
- No data or justification has been given for the need for any major work south of Shankill Main Street. The initial planning and research documents clearly stated that no time gain would be made from work in this location.
- Routing buses, directly or indirectly serving passengers from locations south of Bray, through Shankill increases risks that buses will be full before reaching Shankill.
- While the removal of previous proposals to have bus lanes on Shankill Main Street is very welcome, this key location will continue to be a possible pinch point under current proposals.
- In this context, the creation of four-lane highways between the Wilford Roundabout and Crinken Lane and between Stonebridge Road and Loughlinstown Roundabout will only serve to speed buses to bottlenecks at Bray, and possibly also at Loughlinstown and Shankill Main Street.
- It is also worth noting that Bray Corridor, at 18 kilometres is significantly longer than the next longest of the proposed Core Bus Corridors, the Corridor to Swords, which is approximately 13 kilometres. Other proposed corridors are much shorter.
- The current proposals do not give due consideration to the local geography. The distance between the sea and the mountains at Shankill is approximately 2Km. In this narrow corridor,

particularly at peak travel times, requires an early intervention to start addressing the problems on the corridor. Accordingly, a project to assess the feasibility of providing bus lanes on the N11/M11 corridor is progressing”.

It is important to note that the N11/M11 BPIS is significantly different from Option 2A as evaluated by the NTA in 2017, although it follows a similar route. Rather than a parallel bus-way, this proposal is for bus lanes on the hard shoulder of the existing motorway/dual carriageway. This means a significantly lower capital cost than Option 2A, as well as even less impact on the environment.

It is clear that the N11/M11 BPIS is intended to facilitate bus services to and from locations south of Bray, new communities to the east of Bray and Park and Ride facilities adjacent to the N11/M11 as well as express bus services to and from Bray.

The existing 145 and 155 routes link Bray and Shankill to the City Centre and beyond with a weekday daytime frequency of 9 buses per hour, each way. Their proposed replacement route, E1, has been indicated as 6 buses per hour, each way, similar to the existing 145. As the current service does not encounter significant delays, passing through Shankill at a pace similar to the proposed 30Kph speed limit, what is benefit is to be derived from the high cost of the current proposal, given its impact on the environment and disruption of the social cohesion of Shankill?

Shankill’s population in 2016 was about 10,000 including approximately 1,000 in areas west of the M11. While a population of 13,000 is often quoted, this includes around 3,000 living in parts of Bray which are in County Dublin, such as Corke Abbey and Old Conna. The population of Shankill will not have changed significantly in the 2022 Census but is expected to increase by about 3,000 when the developments at Woodbrook and Shanganagh Castle are completed. This increase will be served by a new railway station at Woodbrook. Future growth is likely to be focused on areas west of the M11. As a consequence, there is unlikely to be any further major population increase in the area between the M11 and the sea.

Continuing the 145/155/E1 service through Shankill will maintain ***“the significant benefits in terms of integration, accessibility and social inclusion as it serves the catchment of Shankill, integrates with the DART and ... deliver a high level of service for bus passengers”*** without this high cost, environmental impact and social disruption.

It is critical that the current proposals are evaluated against the alternative of supplementing the N11/M11 BPIS with appropriate, limited improvements to the route through Shankill to facilitate the expected E1 service level. It would also be helpful if the NTA were to provide details of the evaluation process rather than just generalised comments.

Improving the Public Realm

- The NTA seeks to reduce bus journey times and improve facilities for cyclists and pedestrians, with segregated cycle lanes where possible. However, this is not the case in Shankill, where existing cycle lanes will be removed, while walking will be unpleasant and unsafe as bus lanes will immediately adjoin narrow footpaths, creating risks to pedestrians from bus mirrors and draughts from passing buses.
- Where bus stops are not located close to road crossings, it will be difficult and dangerous to cross the four-lane highway in order to catch a bus. Even with signalised crossings, the absence of median islands will render the crossings intimidating particularly for older pedestrians and children.

- Similarly, a right-hand turn from Shanganagh Road into Beechfield Road was previously trialled but caused major tail backs to the village and was removed. This will be exacerbated if Beechfield Road is the only entrance to Corbawn, as proposed. Exiting Corbawn Lane is likely to be extremely difficult as there will only be one exit lane onto Shanganagh Road. The Corbawn area includes over 700 residential family homes, a large Garda station, a major shopping centre, a medical centre, a nursing home, two Montessori schools as well as providing alternative access to the DART station and the only emergency access route to areas on Quinn's Road east of the DART line, including the Tennis Club, Bowling Club, allotments, residential houses on Quinn's Lane, beach access and sections of Shanganagh Park east of the DART line.
- A survey by local volunteers indicates that of northbound traffic from Shankill Village, approximately one-third proceeds on to the Dublin Road, one third on to Shanganagh Road and on third goes down Corbawn Lane. Under the current proposals, there will be no access onto Corbawn Lane and this traffic will be forced on to Shanganagh Road and obliged to turn right on to Beechfield Road, where no right turns are currently permitted. This will most likely cause serious congestion at peak times.
- Roadworks on Shanganagh Road, adjacent to the Beechfield Road junction caused major traffic disruption, with tailbacks in northbound traffic as far as Main Street and beyond.
- As this area around Shankill Shopping Centre is extensively used by relatively elderly pedestrians, appropriately located signalised crossings, with median islands, will be essential.
- The proposed arrangements for Corbawn Lane should be further reviewed following consultation with Corbawn residents and other stakeholders, including An Garda Síochana, and evaluation of the risk of blockages at the Corbawn Lane junction.
- In the case of Quinn's Road, the earlier traffic lights were removed as residents had difficulties in gaining access to the main road. While improvements at this junction would be welcomed, proposed changes should be discussed with local residents.
- People driving to the village typically use the roundabouts at either end rather than turning on Main Street in order to return to where they came from. As this would no longer be possible, they would have to perform three-point turns on Main Street, resulting in traffic delays.
- The impact on traffic of the location of bus stops on Main Street has been widely noted, yet the proposals do not recommend any changes. Consideration should be given to moving one of the locations so that they are not as close to each other.
- Suggestions that recessed bus-stops would allow traffic to continue to flow have been rejected by the NTA on the basis of difficulties in buses re-entering the traffic lane. Location of bus stops on either side of the pedestrian crossing and linking the lights to the buses could help resolve such difficulties.
- Where four-lane arrangements are proposed, north and south of Shankill Village, residents are concerned that access to and from estates will be restricted, particularly when turning right. Filter lanes could allay such concerns.
- Further consideration should be given to traffic calming measures, avoidance of rat-runs through Main Street and improved pedestrian and cycling facilities.

Impact on the Environment

biodiversity... The role of trees as carbon sequesters and other tree benefits relating to Climate mitigation, air quality and health and wellbeing". Replies to questions when debating the strategy included comments such as **"It is our policy to manage and retain healthy trees which were planted historically in residential verges and are now mature. These trees, due to their maturity, provide many important benefits such as carbon sequestration, mitigation of air pollution, noise abatement, habitat for wildlife to name a few"; "Where they cause severe obstruction, legal nuisance and where a severe problem relating to the tree involving damage to infrastructure or severe obstruction of streetlights that cannot be managed by pruning or other means, only then will removal be considered an option" and "It is extremely difficult to get new trees established in the urban environment with the increasingly dry summers, hostile ground conditions, competition with services in the street and vandalism and these existing trees are a valuable amenity and need to be retained with appropriate management".**

- During Covid-19, access to green space and nature has been critical to the community. It is ironic that the NTA is proposing to remove so many trees and reduce public space for citizens at a time when more people recognise the value of nature, of biodiversity and the mitigating effects that trees have on climate change.
- The proposals should be evaluated for compliance with environmental regulations, including a specific review of the environmental impact on the Shankill area.

Conclusion

In the first round of the consultation process, 1,118 submissions were made to the NTA by the Shankill community. This was a huge proportion in comparison with the entirety of the remainder of Bray to City Centre Core Bus Corridor and reflected the high level of concern within the community. Over 3,300 signatures were secured on an online petition protesting the proposals.

Since Covid-19, several villages which, like Shankill, were bypassed decades ago, have cordoned off areas to improve space for pedestrians and cyclists. Creating a four-lane highway in the Shankill area would have the opposite effect, dramatically diminishing the quality and quantity of public space for residents, reducing facilities for cyclists and effectively cutting the community in two.

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"** quoting the Minister for Transport speaking in the Dáil on 22nd June 2023.

Shankill has just been awarded its second successive gold medal in the 2023 SuperValu Tidy Towns. The adjudicator's report included the comment: **"The approach roads to Shankill village looked well on adjudication day with the approach to the urban village centre from the Shanganagh Road standing out with its eye-catching entrance signage and expertly planted roundabout. The natural stone walls and colourful planters on this approach also help to create a positive first impression for visitors... A major strength of your urban village is considered to be its permeability with pedestrian and cyclist access possible to the main village from the surrounding area and a pedestrian pathway to the railway station. This is a particularly important feature as it can have a positive influence on transport user choices as more can be expected to choose active and public transport options when permeability is good".**

