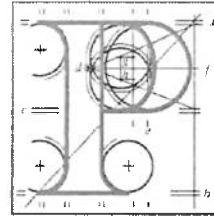


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Siobhan Mac Cobb
16 Holly Park
Corbawn Lane
Shankill

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

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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Reference: Bray to City Centre Bus Corridor Scheme

Name: Siobhan Mac Cobb

Address: 16 Holly Park, Corbawn Lane, Shankill, D18DK30

Introduction

I wish to present my observations to you concerning the BusConnects proposed changes in Shankill, specifically those related to St. Anne's Church roundabout; Corbawn Lane; Shanganagh Road and Beechfield Manor junctions (Junctions 38 and 39).

I consider that the proposals are detrimental to the built, social and heritage environment in Shankill, and damaging to 'sense of place'. Furthermore, they will put vulnerable pedestrians at risk, and degrade the quality of life for elderly local residents and those with disabilities who spend most of their day-to-day life in Shankill.

My observations are informed by my personal and professional experience:

- I am an elderly, long term resident of Corbawn Lane. I am an observer of and participant in the good quality of life offered by the physical, social, natural and heritage environment in Shankill. In addition, I have considerable professional understanding of the role of physical and social environments in inhibiting or enabling social inclusion and healthy engagement by marginalized and vulnerable groups and individuals. I am a retired Assistant Professor in the Discipline of Occupational Therapy, Trinity College, Dublin, with additional qualifications of MSc in Community Health. One example of relevance to this objection is my authorship of "National mobility report: Mobility experiences and perceptions of blind and vision impaired persons" published by NCBI and Irish Guide Dogs for the blind (2012). This study with 564 Irish adults with vision impairment found that ease of mobility is multidimensional, and that the physical and social environment can restrict and lessen engagement in the local community, thus limiting opportunities for full citizenship. Barriers to mobility can be related to the demands of traffic volumes, multi-directional flow, noise and speed that overwhelm the sensory, cognitive and psychological capacity of the person, impacting confidence and ease in community participation and social engagement. This limitation in social engagement negatively affects quality of life, and health and wellbeing. My experience and research with disability groups is guided by disability rights-based and universal design perspectives and well-established EU and national policies. My work involved applying these policies through collaboration with people with disabilities and from marginalized social groups, so that they were empowered and supported to participate in active and satisfying daily lives in their own communities.

No meaningful benefits for Shankill

Firstly, I consider that BusConnects' claims of 'benefit' from the proposed changes to Shankill for the community of Bray and Shankill lack specificity and are poorly evidenced. The claim is one of generalized benefit of travel time-saving (of up to two minutes on a fifty-five-minute journey to St. Stephen's Green, and that this minimal time saving justifies the destruction of physical and visual characteristics of Shankill's built, natural and heritage environment. The

likely harm of this destruction for community members has not been factored into the overall judgement of 'benefit', nor has the impact of changes to traffic flow on accessibility of vulnerable pedestrians been considered. BusConnects' claim is based on a range of suppositions about how transport will work in the future, arising from data gathered in the past, and that the value of such a time saving will positively impact our community members. While general overall aims of improving travelling time has value in such a large-scale project, unless the 'benefit' is specifically examined for each constituent part i.e. Shankill, such claims of benefit are less than valid.

Fundamental to evaluation of a stated benefit is the requirement to present information about who the beneficiaries are, when are the benefits occurring, and how they are valued in the wider context of the lifestyle needs and wishes of the travelling person. How much does it matter that a two minutes journey time is saved? Does something else matter equally or more, such as the built, natural, heritage and social environment of their community? The standardized Community and Population assessment methods used by BusConnects are not sufficiently informative for capturing the impact of such proposed changes on the community of Shankill, and especially for its vulnerable members. While other communities might have some small gains, Shankill has a lot to lose from the imposition of the bus corridor.

Furthermore, I suggest that underlying assumptions of benefit of small travel time saving for workers should be evaluated in light of changes to the nature of working in Dublin since data was gathered. Since the pandemic, there is more flexibility in timing of working hours, more working from home, options for work-life balance, and the possibility of a four-day working week for certain groups of workers. The relevance of a two-minute time saving is less significant now, and may be even more insignificant in the future. This is further diluted in the wider context of travel options in the area - Shankill has alternative transport links such as DART and nearby LUAS. An additional DART station is due to open at Woodbrook (south of Shankill village) by the end of 2024. For commuters travelling from further afield, the very recent development (2023) of the **N11/M11 Bus Priority Interim Scheme** will allow the main Bray to City Centre Bus Corridor join the N11 at the Wilford Junction for northbound journeys and Loughlinstown Roundabout for southbound. Express bus service for Bray / City Centre can use this and Shankill's current bus service can remain for local journeys. Consequently, there is no need to impose the proposals for Shankill.

Inadequacy of the public consultation process

A second important observation relates to the inadequacies of the process of consultation specifically for the population of Shankill, and the failure to meet the Aarhus standards (1998) for elderly people and those with disabilities. An Bord Pleanála has a responsibility to ensure that the principles of the UNECE Environmental Policy on Public Participation should be adhered to when such significant environmental change proposed by BusConnects is being forced on citizens. State funding cannot be used, or public institutions cannot allow such a development when some citizens in the community affected have not been able to assert their rights to participate in decision making, and were not given appropriate assistance in order to do so.

In addition to aging and vulnerable people in the 'general' population, Shankill also includes a unique constellation of supported housing complexes.

They are as follows:

1. The Beechfield Haven and Maryland Independent Living complexes, comprised of a total of 55, one and two bedroomed apartments in the grounds of Beechfield Manor Nursing Home. A requirement is that the resident is aged over 55 years.
2. Beechfield Nursing Home. This is a care home for 68 residents. It has been part of village life for over thirty years, with its residents, staff and visitors using shops, pub and religious services.
3. Elveria, Saint John of God Services. This residential complex for people with intellectual disabilities was an innovative supported living service when established over twenty years ago. Its long-term residents take part in the daily life of Shankill, shop locally, go to the pub, use the bus and Dart and contribute to community life.
4. Parkview, Shanganagh Road, Sunbeam House Services is another residential supported living home for people with intellectual disabilities.
5. Sunbeam House Services have another home on Main Street, supporting 40 people with intellectual disabilities, who when availing of its respite services, enjoy the resources of Shankill in the company of friends.
6. St Joseph's Shankill is the largest care home in Ireland dedicated to dementia care. It has links with the village community, has an award-winning volunteering programme, and it employs local people.

The above are part of the 'population' and part of the space and place of Shankill. Town planning factors must give attention to the unique characteristics of this population. The public consultation process did not give consideration to the specific capacity and interests of all citizens in Shankill and made no effort for transparency and accessibility of the information explaining the possible impacts of the proposed changes on the daily lives of those who live here. I expect that An Bord Pleanála should acknowledge that our citizens who require additional supports in accessing information were not granted it in order to exercise their rights as required by the Aarhus Convention on access to information, public participation in decision making and access to justice in environmental matters (Aarhus, Denmark, June 1998).

Meeting broader societal aims of supporting environments for safe, rich lived experience and vitality - Damage to 'sense of place'

According to the Government's own *Design Manual for Urban Roads and Streets* (DMURS, 2023), "There is a growing appreciation that streets should not just be corridors for traffic, but rather should be places in which people want to live and spend time.

DMURS seeks to put well-designed streets at the heart of sustainable communities and supports broader government policies on the environment, planning and transportation. DMURS provides the practical measures to achieve:

- *Highly connected street which allow people to walk and cycle to key destinations in a direct and easy-to find manner.*
- *A safe and comfortable street environment for pedestrians and cyclists of all ages.*
- *Streets that contribute to the creation of attractive and lively communities.*
- *Streets that calm traffic via a range of design measures that make drivers more aware of their environment.” (DMURS, 2023).*

The recent Covid-19 pandemic highlighted the importance of interaction with the natural landscape, of walking and meeting others in our local community, and the appreciation of culture and heritage as contributors to a healthy and connected community life. The rich Shankill environment and its citizens’ active engagement through Tidy Towns (Gold Medal winners for 2022 and 2023), Shanganagh Park Protection group, and SAGE (Shankill Action for a Greener Earth), should have identified Shankill as a community for appropriately sensitive consideration in this regard. Positive feelings about the place people live in is a central requisite for good design for sustainable, healthy and inclusive communities as acknowledged in DMURS. “Whilst the movement of traffic is still a key issue, there are several others, including the ‘sense of place’, which are of core significance to the creation of safe and more integrated street designs.” (DMURS, 2023, p.26) This is particularly important for vulnerable and frail elderly people who spend most of their daily life in their local community.

The BusConnects proposal is a threat to existing ‘sense of place’ and connection as it will remove significant features of place, such as two-lane roads lined by mature trees, natural landscape features and old cut-stone walls. Of great concern is the plan to remove the roundabout at St Anne’s church. This roundabout is a central focal point of Shankill, and marks the entrance and exit to and from Main Street for Dublin Road, Shanganagh Road and Corbawn Lane. It functions as a link to the people and traffic using Corbawn Lane, serving 700 houses; a Garda Station; the LIDL shopping complex including a creche; Shankill beach, and pedestrian access to the DART station. Shanganagh Road leads to Rathallagh and Shanganagh Cliffs, and the Park and Ride at the Dart station. Radial roads serve several housing estates, three primary schools and the bus stops to Dublin city centre and to Dun Laoghaire.

The church property, in addition to regular religious activity such as Mass and funerals, also hosts a community resource centre, including the parish office, a child care facility, health and leisure classes and meeting rooms for support groups. There is a walkway to the back of the church that acts as a shortcut to and from the bus stops, and is the chosen pedestrian route to the two primary schools on Stonebridge Road for children who live to the east of Dublin Road.

The large, circular roundabout provides visual connectivity to the village for hundreds of people who walk to and through the church property each day and to and from Main Street. Its circular shape, situated within the surround of old cut-stone walls, mature trees and bushes, and the stone church with its south facing circular window, offers an integrating and connecting function. The high quality of planting on the roundabout itself, providing variation in colour, texture, height and movement, generates interest and curiosity. It is replanted throughout the year, orientating the observer to seasonal changes. This roundabout is a

feature of the village that adds quality and value to living in Shankill. It also functions for effective traffic management. It keeps traffic moving, and at a pace that helps the pedestrian process when it is safe to cross the road. Pedestrian islands allow users to cross one lane of traffic at a time.

BusConnects proposes to remove this significant place marker of the roundabout at St Anne's church and replace it with three sets of three-armed traffic lights, extensive yellow box road markings and an altered traffic flow. This will have a negative impact on the experience of 'place', especially for the people for whom the village is the locality of their daily life. What is now an integrating and connecting place marker will be replaced by dissecting, mechanical, sensorily overwhelming intrusions for the purpose of managing an altered traffic flow, that BusConnects consider will shave seconds off some bus journeys to the city centre.

In addition to the loss of a place marker that was carefully maintained to add beauty, interest and to bring the natural environment to our lives, the proposed traffic management system will increase the complexity of traffic movements, increase noise and 'clutter', and increase risk to safety for vulnerable community members by new environmental demands on physical, cognitive and perceptual abilities.

While acknowledging that sometimes a bus can be held at St. Anne's roundabout for a number of seconds, the proposals for its removal are unacceptable for the reasons above, and in light of the limitations of the time-saving benefit, and in the absence of a holistic cost-benefit analysis of the gain/loss to the people and environment of Shankill.

Impact of proposed Junction 39 - Directing all eastbound traffic for Corbawn Lane via Beechfield Manor Nursing Home and the Beechfield Haven / Maryland supported living complexes.

The residents of Beechfield Haven and Maryland, two complexes of supported living units for older people, participate in life of the community, have friends and relatives nearby, are members of local church congregations, and contribute to local groups. The village location enables and supports independent and socially connected living. Beechfield Manor Nursing Home has operated for over thirty years, it employs staff from the locality, sources services locally and contributes to Shankill's economic and social fabric. Residents, their visitors and carers regularly visit the services and resources on Main Street and the LIDL complex. Nearby Costa Coffee, with plaza space sensitively landscaped in keeping with its natural and built setting, offers indoor and outdoor sheltered space and provides a valuable opportunity for participation with the people and life of the village.

A recent traffic survey (James Bergin, BusConnects Action Group, 2023) identified that one third of the traffic going from Shankill village to St Anne's roundabout (Junction 38), subsequently enters Corbawn Lane (eastwards) and another third goes to Shanganagh Road (north east). The survey also found that the greatest tailbacks observed in the radial routes to and from the roundabout were related to Shanganagh Road and the Beechfield Manor junction (39).

Recent development of the LIDL shopping complex has brought more traffic to the area. However, the current prevention of right hand turning from Shanganagh Road at Beechfield

Manor (Junction 39) brings most of the traffic, including huge delivery trucks, down a section of Corbawn Lane to a small roundabout. Although this is an old tree lined, single carriageway, it appears to be working well. There is only one dwelling on this section of Corbawn Lane. This route has protected the residents of the fifty-five, one and two bedroomed homes in Beechfield Haven and Maryland, the sixty-eight residents and staff of Beechfield Nursing Home and residents in the forty-six three and four bedroomed home in two adjacent estates from most of the east bound traffic from St Anne's roundabout.

The BusConnects' plan is that no traffic will go east from the new Junction 38 (replacing the roundabout) to the top of Corbawn Lane. Instead, it will be re-routed to a right-hand filter lane at Junction 39, at Beechfield Manor. This proposal will re-route the majority of traffic accessing Corbawn Lane, the Garda Station, LIDL, the creche, pharmacy, two GP surgeries, and Costa Coffee directly outside the residences of Beechfield Haven / Maryland and Beechfield Manor Nursing Home. Moreover, the plan for the southbound Shanganagh Road approach to Junction 39 is to add a left filter lane, to speed access for traffic onto Beechfield Manor, making this junction the busiest in the whole of Shankill and the most complex in terms of traffic patterns.

The proposed right filter lane (Junction 39) at Shanganagh Road/ Beechfield Manor of approx. 30m long will accommodate five or six cars. This will cause congestion as once this filter lane is full, traffic waiting to join the filter lane will begin to block the single northeast bound carriageway and also impact free movement from Dublin Road to Shanganagh Road. This right-hand turn was removed some years ago, due to the congestion it created for both north and southbound traffic on Shanganagh Road. Additionally, it seems that the exit route from Corbawn Lane will not be signalised, so the driver will be dependent on good road etiquette from another for exiting onto a yellow box. It is likely that some drivers will instead take the exit route via Beechfield Manor because it is signalized, thus adding further to the traffic volume at Junction 39. These alterations to the traffic flow will significantly impact freedom of movement for all the residents of Corbawn Lane.

DMURS places the pedestrian as the top priority in all of its recommendations. It states that the need for more walkable communities is also an issue of social equity as it is the poorest and most vulnerable "who are disproportionately affected by the threat of accident, community severance and loss of social cohesion" (DMURS, 2023, p. 28.) Unfortunately, the BusConnects proposal fails to do so in this plan for Junction 39. It is sited at the shortcut to the back of the church, the most used pedestrian route for bus stops and two primary schools, the church, the parish office hosting a creche, leisure classes and support group meetings, and for those walking to the Dart station from the north and western side of the village. Junction 39 will become the most demanding route crossing for most pedestrians, and it is being placed outside the site of the homes of the largest group of vulnerable people who live in Shankill. Instead of planning for traffic calming, ease and comfort for the vulnerable pedestrian, the proposal will do the exact opposite.

This complexity of traffic movement patterns, multiple signalling stimuli, and congestion will add to the stress provoking effects of busy traffic, and impact negatively in terms of feelings of safety and comfort in accessing the immediate environment and feelings of connectivity to the village. Perceptions of safety, ease and comfort felt by the vulnerable pedestrian are

important factors influencing decisions to leave the house and engage with the wider community. Perceptions of safety are impacted by increased noise levels and complexity of movement patterns and of traffic volumes, in placing additional demands on judgement and cognitive processing of multiple stimuli of sound, vision, speed of movement, and timing. Increased traffic flow directly outside the homes of elderly and vulnerable people will induce additional stress, damage personal confidence and limit pleasure of engagement in every-day life. This proposal will act as an environmental barrier. It will inhibit freedom to move about with ease, and lessen comfort in participation in the community.

It is simplistic to suggest that pedestrian traffic lights will address the increased demands of traffic volumes, patterns of flow from multiple directions and general busyness on cognitive and perceptual processing, sensory systems, judgement and decision-making capacity, and confidence in personal agency of our elderly and vulnerable community members. Good design should ease, not impede. This proposal to re-route traffic directly outside a well-established housing complex for elderly and vulnerable people is totally unacceptable, will bring no benefit to them and indeed will cause harm. The existing traffic flow using the upper end of Corbawn Lane, passes only one dwelling, and is by far the best and safest traffic route. The current roundabout at St Anne's church manages the traffic flow in an effective and efficient manner.

Conclusion and Recommendations

There is no evidence available to me that the BusConnects assessment of the possible environmental impact of the proposed changes considered how community lived experience will be altered with reference to elderly and disabled community members, of which there are many in Shankill. Quite the opposite, its proposals will restrict ease of mobility, restrict pleasurable engagement in daily life in the community, put people at physical risk, and negatively impact health and wellbeing. The UN Convention of Rights of Persons with Disabilities, the EU Disability Action Plan and Irish national policy expects that barriers to participation in everyday life are removed, and moreover, it is a fundamental requirement in all public funded services and activities that participation in community and public life is actively supported for all community members. Although many specialists were involved in assessment of the environment, there was no specific focus on the possible benefits or harm to Shankill's elderly and vulnerable community members who live in long established community-based homes. The Government's focus is on building sustainable and liveable towns and villages promoting social inclusion, healthy aging, and encouraging active participation in community life by all its citizens. The Bus Connects programmes must support not hinder the broader scope of good design.

BusConnects has also failed to recognise the importance of place to citizens of Shankill. It appears to me that BusConnects' limited view of Shankill is that of a traffic corridor, one of many in the Dublin area, which should be improved to deliver on their mission of benefit to society of shorter bus commuting times. However, that such assumption of benefit, when applied to Shankill, does not withstand scrutiny. Moreover, the possible harm to citizens in degrading the local community has not been explored, or has the public consultation process been appropriate to the population. What is entirely omitted in the assessment of benefit is that Shankill is a vibrant, well-established, socially aware, inclusive community. This too has important societal value, especially for the people who live here.

Bus Connects proposals should be reviewed especially in light of the decision by Wicklow County Council's progression of the N11/M11 Bus Priority Interim Scheme (in partnership with Dun Laoghaire-Rathdown County Council, Transport Infrastructure Ireland, the National Transport Authority, and the Department of Transport). The main Bray to City Centre bus corridor should follow the N11 between the Wilford Junction and Loughlinstown Roundabout using this Bus Priority Interim Scheme. There is now no requirement for a bus corridor through Shankill.

As a long-term resident and from extensive professional experience developing systems and services to ensure inclusion of people with disabilities, I am acutely aware of our unique community constituents as I go about my everyday life. The current physical and social infrastructure supports a good model of community involvement, active citizenship and inclusive social support. The Bus Connects proposals will degrade and damage rather than enrich and enable.

In consideration of the omissions in the public consultation process, the limitations of perceived benefit to Shankill's population, the potential of risk to quality of life in the degrading of the built, natural and heritage environment, and in light of the recently announced alternative route using the N11/M11 Bus Priority Interim Scheme, a full review of decision making must occur.

I seek your recommendation for an oral hearing.

Yours sincerely,

Siobhan Mac Cobb, Dip. COT, MSc in Community Health, PhD.

16, Holly Park, Corbawn Lane, Shankill, D18 DK30

Email: 