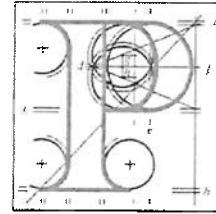


**Our Case Number:** ABP-317780-23



**An  
Bord  
Pleanála**

Nigel Kenning  
Thingwall  
Dublin Road  
Shankill  
D18 F8C3

**Date:** 13 October 2023

**Re:** Bray to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2023  
Bray to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your objection in relation to the above-mentioned compulsory purchase order.

In respect of same, please note that in circumstances where

- (i) no objections are received by the Board within the period provided for making objections, or
- (ii) all objections made are subsequently withdrawn, or
- (iii) all objections made relate exclusively to matters which can be dealt with by a property arbitrator the Board will inform the local authority as appropriate and, in such circumstances, the local authority can itself confirm the order with or without modification or refuse to confirm the order in accordance with the provisions of section 216 of the Planning and Development Act, 2000, as amended.

Please be advised that those listed on the Compulsory Purchase Order schedule associated with this application are not required to pay the €50 fee associated with this case. As you are listed on the schedule, a refund of €50 will be issued to the debit/credit card used to make payment for this submission .

The Board will revert to you in due course in respect of this matter. If you have any queries in the meantime 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.

Teil  
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64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Yours faithfully,

*pp H*

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Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

CH04

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Observation on Bus Connects proposal Bray to City Centre,

Submitted by

Nigel Kenning; Thingwall, Dublin Rd Shankill, Co Dublin D18F8C3

Observation; Bus Connects proposal Loughlinstown roundabout to Bray; (part of Bus Connects Bray to City Centre)

ABP reference HA27.317742

The benefit to be gained by installation of bus lanes in the section of the route from Loughlinstown roundabout to Wilford is questioned in this submission, with data provided which appears to demonstrate the development from Wilford to Loughlinstown Hospital roundabout does not contribute anything to the goal of achieving more reliable and reduced bus journey times.

If there are no benefits to improved bus journey times, then other aspects of the scheme must provide the benefits to be able to justify the expenditure and disruption associated with the scheme. The proposed scheme will apparently have "positive, not significant to moderate and long term benefits for cyclist accessibility" (ref section 8.5. This is not glowing recommendation for a key aim and objective of the scheme. There are also positive moderate long term benefits for private vehicles, which may be as a result of the scheme, though this is difficult to understand when the installation of bus lanes would appear to improve the potential flow rate of traffic throughout the Wilford to Loughlinstown section of the Bus Connects without providing a significant benefit for bus traffic.

During the operational phase of the scheme there are negative townscape and streetscape effects on the sections from Loughlinstown roundabout to Wilford and Wilford to Bray. (Townscape and Streetscape Character - Loughlinstown Roundabout to Wilford Roundabout Negative, Very Significant, Short-Term Negative, Moderate, Long-Term environmental impact townscape, (chapter 17 of the Bus Connects submission)

Community Accessibility (Bus Users): University (Newman) Church, Haddington Road, Rathmines, Donnybrook, Merrion Road, Booterstown, Mount Merrion, Kilmacud – Stillorgan, Foxrock, Cabinteely, Ballybrack – Killiney, Loughlinstown, Shankill and Little Bray Positive, Moderate to Profound and Long-Term Positive, Moderate to Profound and Long-Term Bus access (Not sure how this applies to Shankill where the bus service is high service level, possibly lacking in some reliability but nominally already a bus every 6 minutes )

From a bus journey time perspective, surveys carried out show that the benefits of the development in the Loughlinstown to Wilford section are likely to be negligible. This is in contrast to the section from Wilford to Bray, where the benefits are likely to be significant.

Image 2.18 in the Bus Connects submission seems to indicate an expectation that the loading on public transport on the high quality bus scheme will increase in the section from Loughlinstown roundabout to Shankill from approx. 600 per hour to approx. 1200 per hour. This would suggest an expectation that the number of buses on the route section will increase for the current 10 or 11 per hour (scheduled route no.s 145 and 155 at peak hours and 84 and 143) to 20 per hour. With peak traffic volumes currently being approx. 600 traffic units per hour and expected to fall as a result of the scheme being implemented, the increase from the bus volume of 1.5% would probably have a negligible effect on congestion.

In summary, this observation provides data which seems to offer strong evidence that the scheme planned between Wilford and Loughlinstown is unnecessary. There will be negligible improvement in bus times through the proposed changes. This is in contrast to the Wilford to Bray section, where the changes would be expected to provide much of the improved reliability objective for the whole

scheme. The other benefits of the scheme would have to be significantly greater than the proposal identifies to justify the disruption to the social and environmental impacts of the scheme on the Shankill locale.

Traffic data

Traffic data was measured visually at Kenfeld, north of Rathmichael School, in March 2019 on week days, and showed a peak volume of 147 vehicles per 10 mins during the southbound peak (equivalent to 882 vehicles per hour) at 6pm

Morning peak northbound was 107 vehicles per 10 mins at 8am (equivalent to 642 vehicles per hour)

The equivalent figures measured in September 2023 5.40pm showed a peak of 123 vehicles per 10 mins southbound (equivalent to 738 vehicles per hour) and 97 vehicles per hour northbound at 8.50am (equivalent to 582 vehicles per hour). This seems to confirm the longer term expectations that traffic volumes will fall during the planning period. The data collected is shown in Appendix 1 and is summarised in the charts 1 and 2 below.

General conclusions from the very quick and limited survey seem to show that traffic volumes are stable at worst and may be reducing over time. There is adequate road capacity to accommodate any potential increase in bus traffic that may arise because of the Bus Connects development in the area without the necessity to install bus lanes.

Chart 1

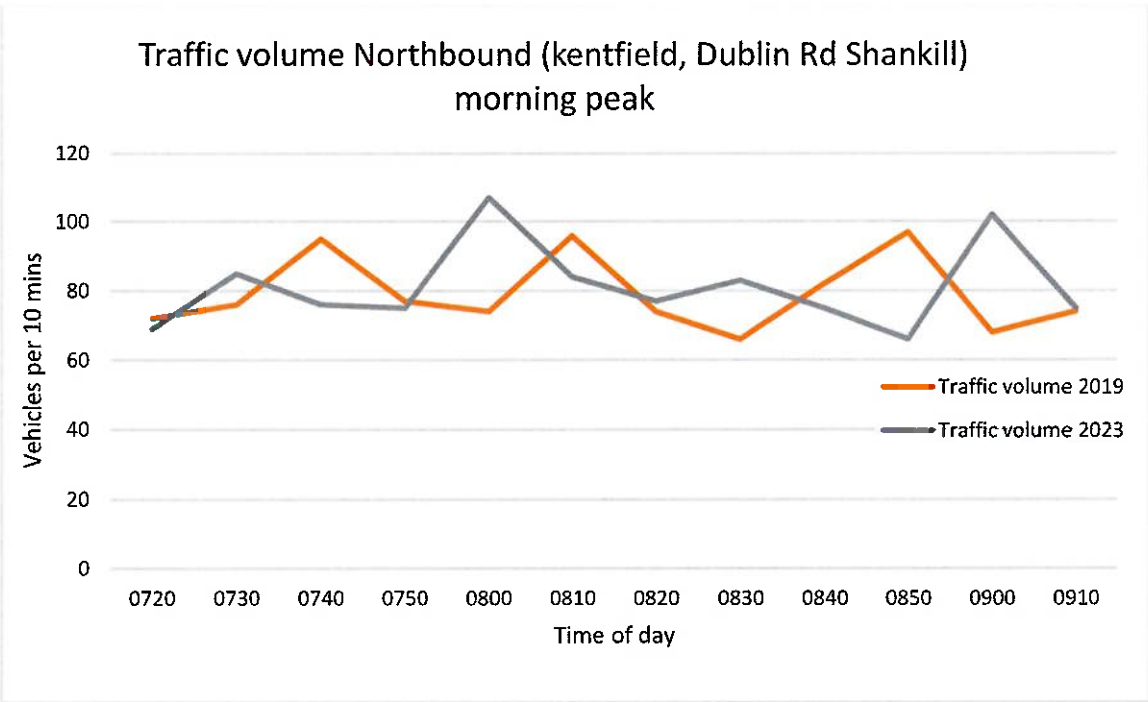
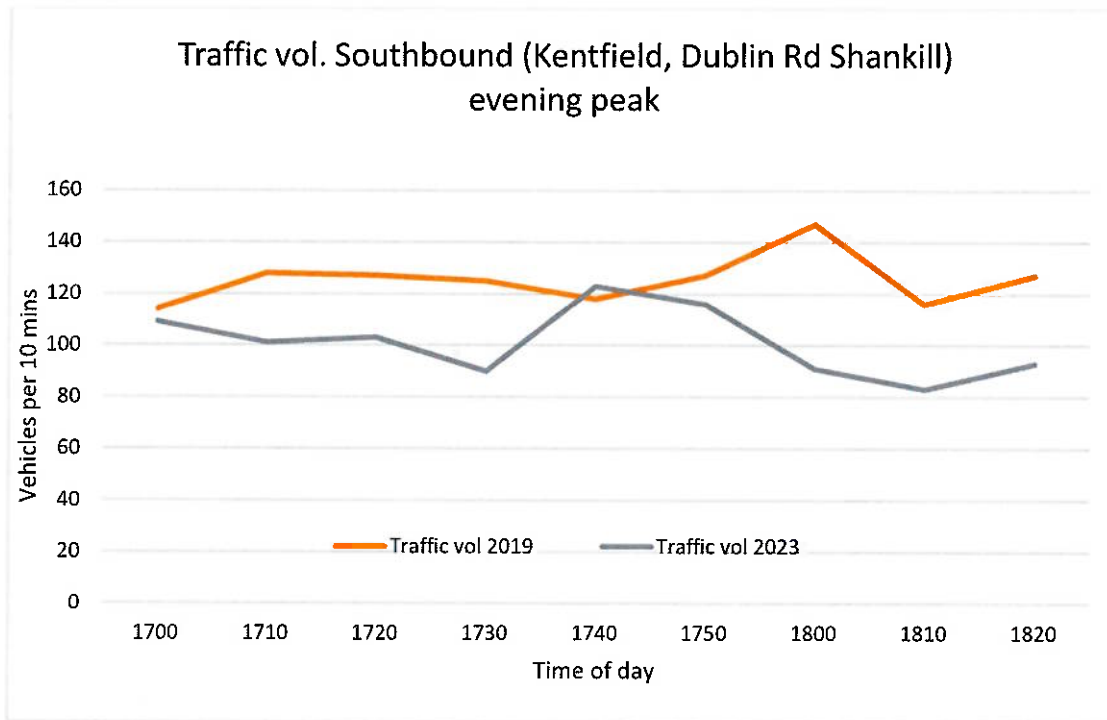


Chart 2



#### Bus Journey time data, Bray to Loughlinstown section of Bus Connects

This data was generated by taking bus journeys on the days commencing Saturday 02Sep and ending 07Sep. A total of 6 journeys northbound were surveyed, with 2 starting from Bray at 7.43 am and 8.24am. For southbound journeys, a total of 7 were surveyed, with 3 starting at 4.12pm, 4.57pm and 5.57pm. The time as the bus arrived at or passed at each stop was recorded. Times were always recorded to the nearest lower minute. For a number of the journeys, an effort was made to measure the length of time the bus was stopped at bus stops. (The number of stops was used to plot journey times and number of stops, but no clear correlation is evident. As a result, stop time data is not included in this observation, but is available should it be required. No claim to precision is made but should be a reasonable reflection of actual performance). The data generated is shown in Appendix 2 and is summarised in the charts below which show journey times of sections of the journeys shown against the number of stops the bus made in that section of the journey.

General conclusions from this quick and simple survey seem to show the following

- The number of stops made does not seem to have great impact on journey times
- Journey times between Quinsboro Rd and Woodbrook varied from 4 to 9 mins northbound and 5 to 13 mins southbound. These are wide variations for a journey length of approx. 1.2km and seem to offer significant opportunity for journey time improvement with appropriate design changes such as those proposed in Bus Connects.

- Journey times between Woodbrook and Loughlinstown Hospital varied from 7 to 9 mins northbound and 6 to 9 mins southbound, a much narrower variation for a journey length of approx. 2.3km, almost twice the distance from Woodbrook to Bray Quinsboro Rd.

Charts of journey times against stops

Chart 3

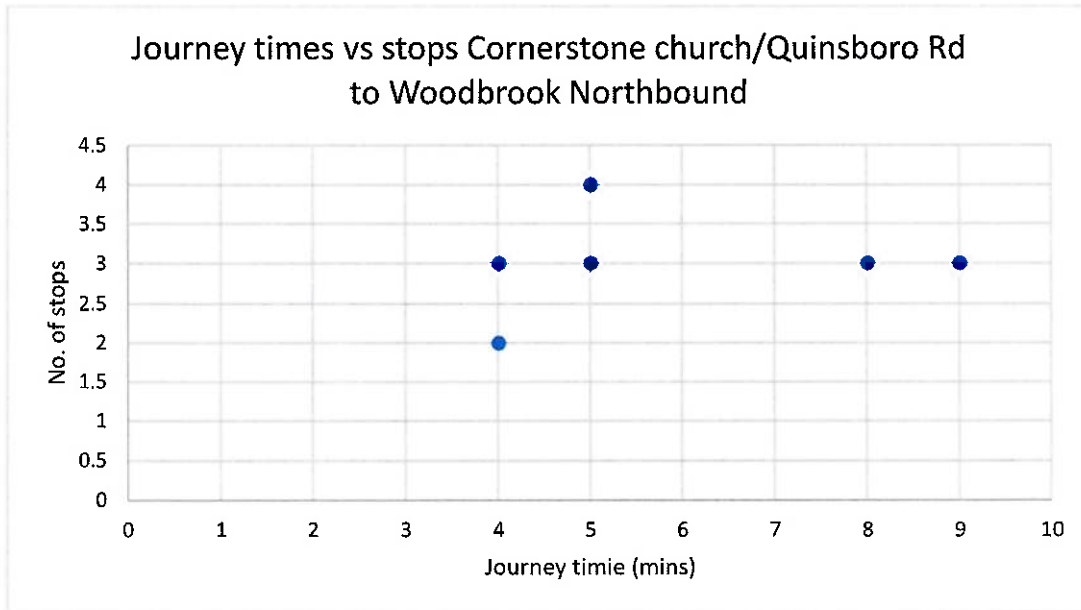


Chart 4

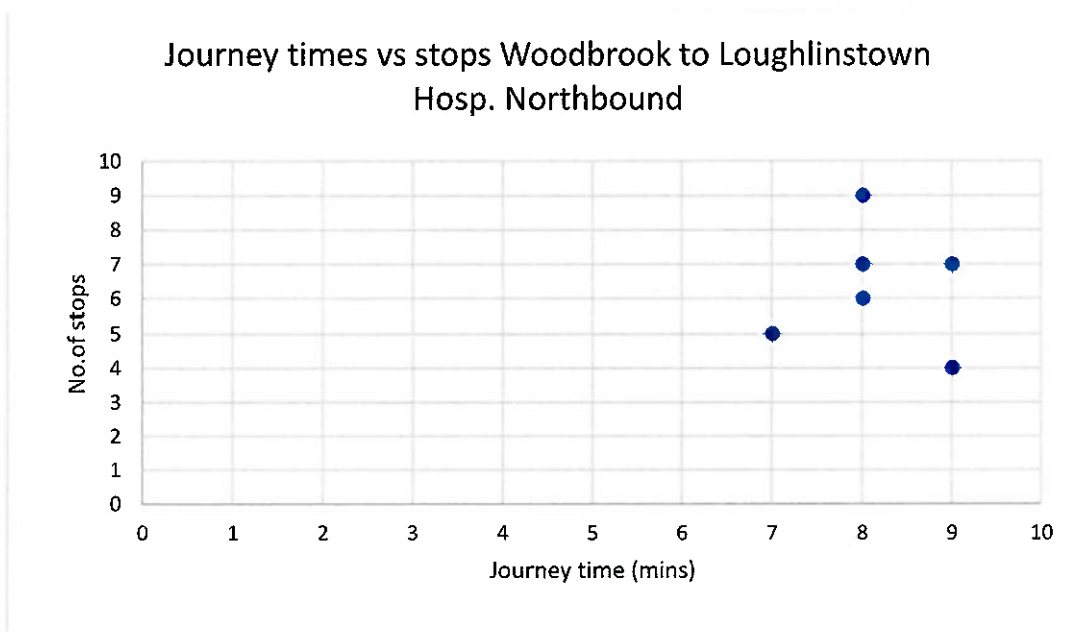


Chart 5

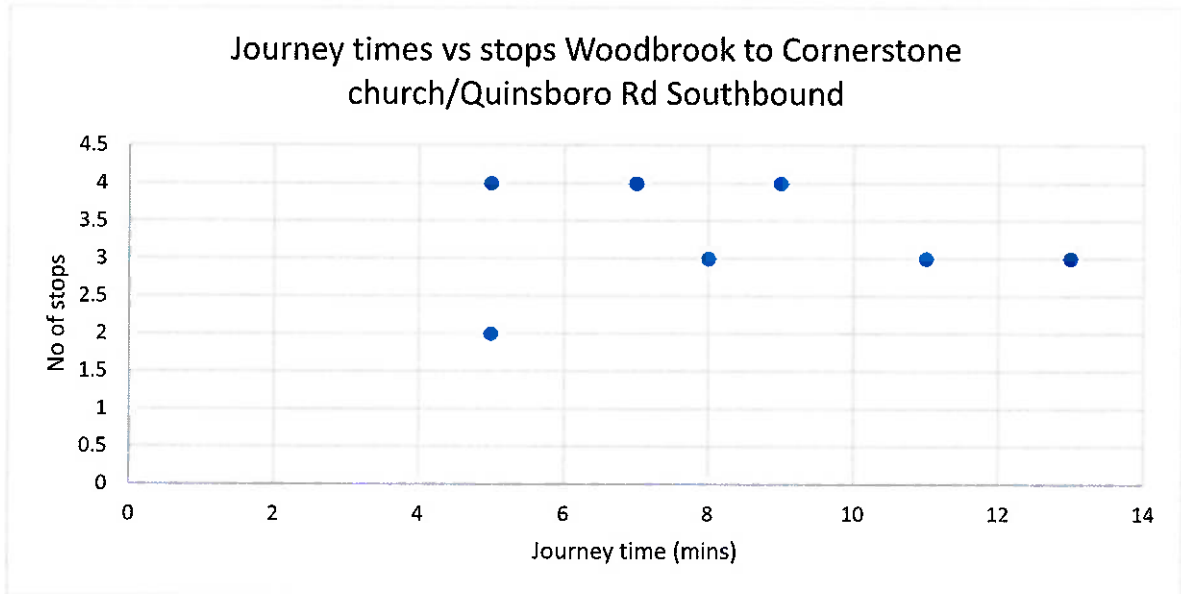
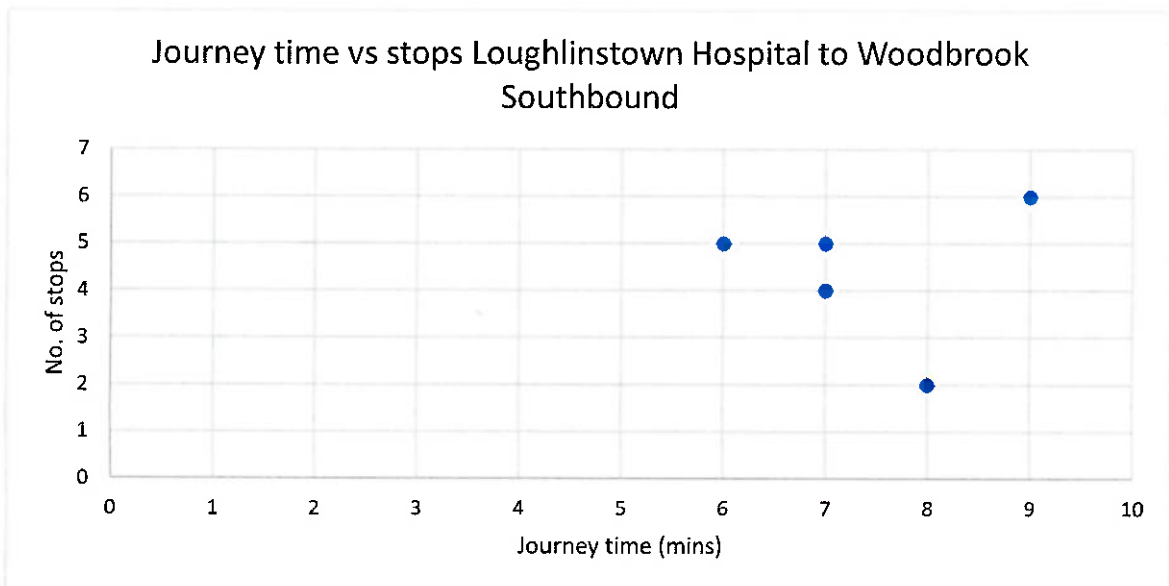


Chart 6



Journey time data is provided in Appendix 2



### Additional notes

The proposed Light controlled crossing to the north of Seaview Park appears to be incorrectly located. With a significant amount of bus users coming from the Shanganagh Rd area, the crossing should be located to the south of Seaview Park. (detail only). Doubling the width of the road and will tend to increase traffic speed, (despite the fact that the speed limit for the route remains unchanged at 50k/hr) adding to the dangers associated with crossing the road at non-light controlled crossings.

Dublin Bus appears to use Castle St. as a bus driver change point. On 2 of the journeys surveyed, drivers changed at this point, the changes taking 2 mins and 16 mins. There are opportunities here for journey times to be made more reliable. (The delays caused by the changes were removed from the data for the purpose of analysis.)

Most of the conclusions from the surveys would have confirmed anecdotal evidence. I must assume that Dublin Bus are aware of the congestion points and times of delays that occur in the section from Quinsboro Rd to Woodbrook in both directions. Similarly Dublin Bus should be aware that there are no (or negligible) traffic generated bus delays in the section from Woodbrook to Loughlinstown in either direction.

Appendix 1

Traffic flow data Kentfield, between Loughlinstown roundabout and Rathmichael NS

Traffic survey Kentfield Northbound 2019

Date	Time start	Time finish	Dir.	No.of vehicles		Date	Time start	Time finish	Dir.	No.of vehicles
	0600						1330			
	0610						1340			
08mar	0620	0630	n	32		12mar	1350	1400	n	60
	0630						1400			
	0640					01mar	1410	1415	n	18
08mar	0650	0700	n	50			1420			
06mar	0700	0710	n	83		04mar	1430	1440	n	76
06mar	0710	0720	n	73		04mar	1440	1450	n	73
05mar	0720	0730	n	72		04mar	1450	1500	n	52
01mar	0730	0740	n	76			1500			
05mar	0740	0750	n	95			1510			
06mar	0750	0800	n	77			1520			
01mar	0800	0810	n	74			1530			
06mar	0810	0820	n	96		06mar	1540	1550	n	60
01mar	0820	0830	n	74			1550			
05mar	0830	0840	n	66			1600			
01mar	0840	0850	n	82			1610			
06mar	0850	0900	n	97			1620			
01mar	0900	0910	n	68			1630			
06mar	0910	0920	n	74		05mar	1640	1650	n	37
	0920						1650			
07mar	0930	0935	n	22			1700			
	0940						1710			
28feb	0950	1000	n	49			1720			
	1000						1730			
	1010					12mar	1740	1750	n	58
	1020						1750			
	1030						1800			
	1040						1810			
	1050						1820			
	1100						1830			
	1110					12mar	1840	1850	n	63
	1120						1850			
	1130						1900			
	1140						1910			
	1150						1920			
	1200						1930			
04mar	1210	1220	n	53		06mar	1940	1945	n	26
	1220						1950			
	1230						2000			
	1240						2010			
	1250						2020			
06mar	1300	1310	n	82			2030			
	1310					12mar	2040	2050	n	41
	1320						2050			

Traffic survey Thingwall Kentfield Southbound 2019

Date	Time start	Time finish	Dir.	No.of vehicles		Date	Time start	Time finish	Dir.	No.of vehicles
	0600						1330			
	0610					12mar	1340	1350	s	71
	0620						1350			
08mar	0630	0640	s	18		04mar	1400	1410	s	70
	0640					04mar	1410	1420	s	76
	0650					01mar	1415	1420	s	40
	0700					04mar	1420	1430	s	66
	0710					12mar	1440	1450	s	60
	0720						1450			
08mar	0730	0740	s	45			1500			
	0740						1510			
	0750						1520			
	0800					06mar	1530	1540	s	74
04mar	0810	0820	s	43			1540			
05mar	0820	0830	s	44			1550			
04mar	0830	0840	s	69			1600			
04mar	0840	0850	s	53			1610			
04mar	0850	0900	s	75			1620			
04mar	0900	0910	s	58		05mar	1630	1640	s	102
04mar	0910	0920	s	65			1640			
04mar	0920	0930	s	45			1650			
	0930					04mar	1700	1710	s	114
07mar	0940	0950	s	77		04mar	1710	1720	s	128
	0950					04mar	1720	1730	s	127
06mar	1000	1010	s	52		04mar	1730	1740	s	125
	1010					04mar	1740	1750	s	118
	1020					04mar	1750	1800	s	107
	1030					05mar	1800	1810	s	147
	1040					05mar	1810	1820	s	116
	1050					05mar	1820	1830	s	123
	1100						1830			
	1110						1840			
	1120					12mar	1850	1900	s	96
	1130						1900			
	1140						1910			
	1150						1920			
04mar	1200	1210	s	51		06mar	1935	1940	s	28
	1210						1840			
	1220						1950			
	1230						2000			
06mar	1240	1245	s	23		12mar	2010	2020	s	68
06mar	1250	1300	s	79			2020			
	1300						2030			
	1310						2040			
	1320						2050			

### Traffic survey Kentfield Northbound 2023

Date	Time start	Time finish	Dir.	No.of vehicles		Date	Time start	Time finish	Dir.	No.of vehicles
	0600						1330			
	0610						1340			
	0620						1350			
	0630						1400			
	0640						1410			
	0650						1420			
	0700						1430			
	0710						1440			
13sep	0720	0730	n	69			1450			
13sep	0730	0740	n	85			1500			
13sep	0740	0755	n	76			1510			
13sep	0750	0800	n	75			1520			
13sep	0800	0810	n	107			1530			
13sep	0810	0820	n	84			1540			
13sep	0820	0830	n	77			1550			
13sep	0830	0840	n	53			1600			
13sep	0840	0850	n	75			1610			
13sep	0850	0900	n	61			1620			
15sep	0900	0910	n	102			1630			
15sep	0910	0920	n	75			1640			
15sep	0920	0930	n	66			1650			
	0930						1700			
	0940						1710			
	0950						1720			
	1000						1730			
	1010						1740			
	1020						1750			
	1030						1800			
	1040						1810			
	1050						1820			
	1100						1830			
	1110						1840			
	1120						1850			
	1130						1900			
	1140						1910			
	1150						1920			
	1200						1930			
	1210						1840			
	1220						1950			
	1230						2000			
	1240						2010			
	1250						2020			
	1300						2030			
	1310						2040			
	1320						2050			

### Traffic survey Kentfield Southbound 2023

Date	Time start	Time finish	Dir.	No.of vehicles		Date	Time start	Time finish	Dir.	No.of vehicles
	0600						1330			
	0610						1340			
	0620						1350			
	0630						1400			
	0640						1410			
	0650						1420			
	0700						1430			
	0710						1440			
	0720						1450			
	0730						1500			
	0740						1510			
	0750						1520			
14sep	0800	0810	s				1530	1540	s	84
14sep	0810	0820	s				1540			
14sep	0820	0830	s				1550			
14sep	0830	0840	s				1600			
14sep	0840	0850	s				1610			
14sep	0850	0900	s				1620			
14sep	0900	0910	s				1630			
14sep	0910	0920	s				1640			
14sep	0920	0930	s				1650			
	0930						1700	1710	s	109
	0940						1710	1720	s	101
	0950						1720	1730	s	103
	1000						1730	1740	s	90
	1010						1740	1750	s	123
	1020						1750	1800	s	116
	1030						1800	1810	s	91
	1040						1810	1820	s	83
	1050						1820	1830	s	93
	1100						1830			
	1110						1840			
	1120						1850			
	1130						1900			
	1140						1910			
	1150						1920			
	1200						1930			
	1210						1840			
	1220						1950			
	1230						2000			
	1240						2010			
	1250						2020			
	1300						2030			
	1310						2040			
	1320						2050			

Appendix 2

Bus journey time data between Bray Cornerstone Church /Quinsboro Rd and Loughlinstown roundabout

Southbound journey times; 2023

Day	Sat	Mon	Mon	Tue	Tue	Thu	Thu
Date	02/09	04/09	04/09	05/09	05/09	07/09	07/09
Loughlinstown Hosp	1424	1502	1612	1657	1757	0718	0802
Kentfield	1425	1503	1613	1658	1758	0719	0803
Station Rd	1427	1504	1614	1659	1759	0720	0804
Stonebridge Close	1428	1505	1616	1701	1800	0722	0806
Claremount	1429	1506	1617	1702	1801	0723	0807
Shanganagh Castle	1431	1507	1618	1703	1802	0724	0808
Shanganagh Cem.	1431	1508	1619	1703	1802	0725	0808
St.James Church	1432	1508	1620	1704	1803	0726	0809
Woodbrook	1433	1509	1621	1704	1803	0727	0810
Old Conna Av	1437	1513	1623	1708	1806	0728	0811
Castle St	1443	1518	1625	1711	1808	0730	0813
Dwyer Park	1443	1519	1626	1712	1809	0730	0813
Cornerstone Church	1446	1520	1628	1713	1811	0732	0815

Northbound journey times; 2023

Day	Mon	Mon	Tue	Tue	Thu	Thu
Date	04/09	04/09	05/09	05/09	07/09	07/09
Cornerstone Church	1529	1632	1725	1813	0743	0824
St.Cronan's Rd	1530/1546	1633	1726/1728	1815	0743	0827
Roseville Court	1546	1634	1729	1815	0745	0829
Old Conna Av	1551	1636	1730	1817	0746	0832
Woodbrook	1552	1636	1731	1818	0748	0833
St.James Church	1553	1637	1732	1819	0749	0834
Shanganagh Cen.	1553	1638	1732	1819	0749	0835
Shanganagh Castle	1554	1639	1732	1820	0750	0835
Crinken Lane	1554	1640	1732	1821	0750	0835
Claremount	1555	1640	1733	1821	0751	0836
Stonebridge Close	1557	1641	1733	1822	0752	0836
Station Rd	1558	1642	1734	1824	0753	0838
Kentfield	1559	1643	1735	1824	0754	0840
Loughlinstown Hosp	1601	1644	1736	1826	0756	0842

Note 1

Note 1

Delays caused by driver changes discounted in analysis