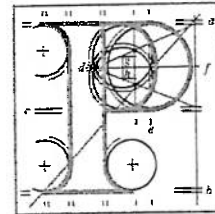


(P)

Our Case Number: ABP-317780-23
Planning Authority Reference Number:
Your Reference: Sir Marc Cochrane



**An
Bord
Pleanála**

John Spain Associates
39 Fitzwilliam Place
Dublin 2
D02 ND61

Date: 17 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 letter of 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 - (ii) all objections made are subsequently withdrawn, or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.

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 on this matter in due course.

If you have any queries in the meantime 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

CH02

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D01 V902 D01 V902

Submission to National Transport Authority

In respect of

**Bray to City Centre BusConnects Scheme
(ABP Reg. Ref. HA27.317742)**

Prepared by

John Spain Associates

AN BORD PLEANÁLA	
LDG-	<u>067658-23</u>
ABP-	<u>317780-23</u>
10 OCT 2023	
Fee: €	<u>50.00</u> Type: <u>CHQ.</u>
Time: <u>12:04pm</u>	By: <u>Hanel</u>

On behalf of

Sir Marc Cochrane

October 2023

JSA John Spain Associates
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Appendix 1: Landscape & visual Impacts Of Bus Connects Proposals On Woodbrook Estate

Frontage

Appendix 2 Traffic & road Design Assessment

DOCUMENT CONTROL SHEET

Client:	Sir Marc Cochrane
Project Title:	BusConnects Bray to City Centre Route
Document Title:	BusConnects Submission – Woodbrook Estate
Document/Job	JSA 19089 Ref 10102023 DV4

Rev.	Status	Author(s)	Reviewed By	Approved By	Issue Date
DV1	DV1	DF	BC	JS	04.10.2023
F01	F01	DF	BC	JS	10.10.2023

1.0 INTRODUCTION

- 1.1. We John Spain Associates, have prepared this submission, on behalf of our client, Sir Marc Cochrane, of Woodbrook Estate, Shankill, Co. Dublin in relation to the BusConnects Bray to City Centre application has been lodged with An Bord Pleanála (ABP Reg. Ref. HA27.317742). Please see enclosed fee of €50 (cheque) for the submission.
- 1.2. Our client is the owner of the nineteenth century Woodbrook House estate which is located within a green belt between Shankill and Bray with an extensive frontage onto the Old Dublin Road. Our client's property incorporates a number of protected structures including Woodbrook House itself, entrance gates and a number of original Lodges.
- 1.3. The following main concerns will be addressed in this submission:
 - Significant Impacts on Woodbrook Estate and the protected structures as a result of the removal of the historic boundary wall and the demolition of Woodbrook Side Lodge, a protected structure.
 - Significant removal of mature trees within the curtilage of a protected structure (impact on sylvan character of the area)
 - Resulting non compliance with policies and objectives of the Shanganagh-Woodbrook Shanganagh Local Area Plan (2017-2023) and the policies and objectives of the Dun Laoghaire-Rathdown County Development Plan 2022-2028
- 1.4. Please also see enclosed Landscape & visual Impacts Of Bus Connects Proposals On Woodbrook Estate Frontage prepared by Doyle & O'Troithigh Landscape Architecture as Appendix 1 and Traffic Assessment by NRB as Appendix 2.



Figure 1.1. Sir Marc Cochrane lands at Woodbrook House, Woodbrook, Shankill, Co. Dublin (Source: Google Maps, 2023) (approx. outline of Woodbrook House Estate in red).

2.0 BACKGROUND TO WOODBROOK ESTATE

- 2.1. The Woodbrook Estate was laid out and developed in the mid nineteenth century. Woodbrook House itself was built in 1835. This period house, and the structures located within the curtilage of the house, including its two lodges (front & side lodges) on the Dublin Road and its formal entrance (walls, gates and railings) are all listed as Protected Structures in the Dun Laoghaire Rathdown County Development Plan 2022-2028.
- 2.2. The R119 Dublin Road from the M11 access roundabout to Shankill Village has an historical character with granite boundary walls and gate lodges all flanked by mature tree stands on both sides of the roadway. The development proposals would require the removal of historical estate stone walls and significant numbers of mature trees close to the roadway significantly altering the environment of the roadway.



Figure 2.1: Gatelodge and main entrance looking south (Source: JSA, 2023)



Figure 2.2: Dublin Road looking northwards towards Shankill (Source: JSA, 2023)



Figure 2.3: Southern section from Wilford roundabout (Source: JSA, 2023)

2.3. The Woodbrook Estate contains a number of protected structures and architectural features as shown in Fig. 2.4. The Estate is characterised by mature landscaping which screens Woodbrook House from the Dublin Road. Removal of this screening will create a negative visual impact on the protected structures and grounds of the estate. The proposed development has not sufficiently detailed the impact that the removal of the wall and trees will have on the wider setting of Woodbrook House and the curtilage of the protected structures.

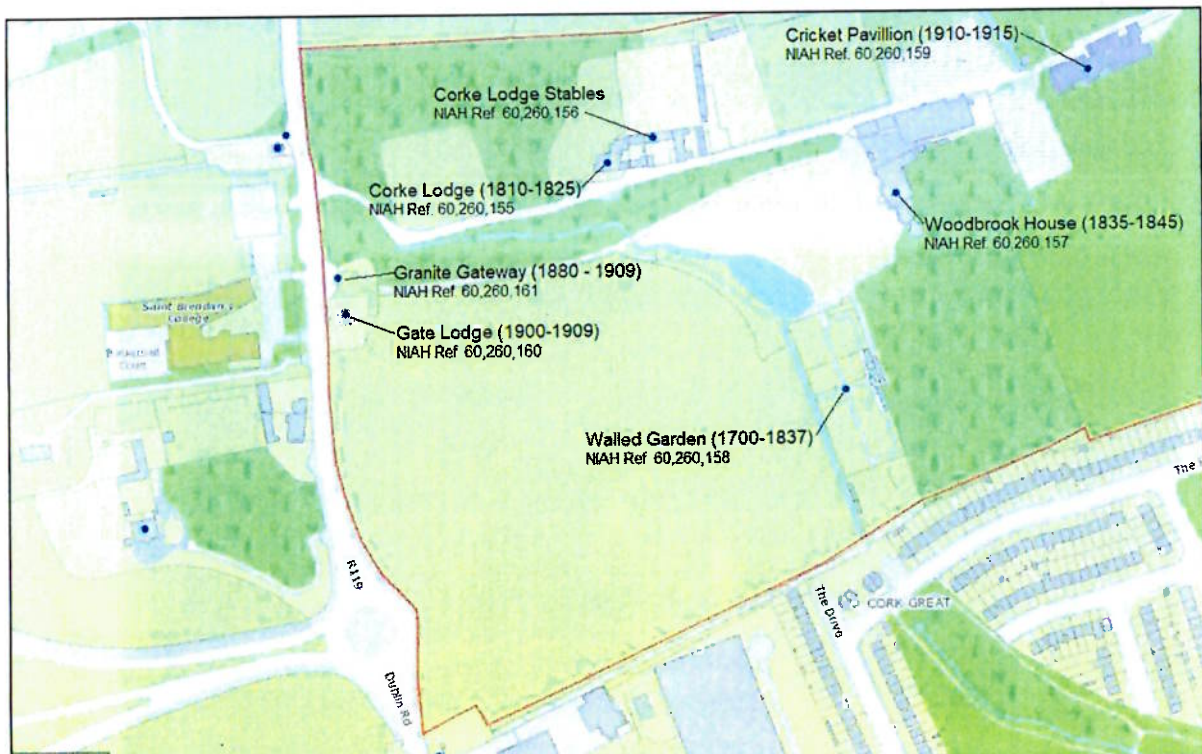


Figure 2.4 - Woodbrook Estate – Listed National Inventory of Historical Architecture (<https://www.buildingsofireland.ie/>)

2.4. The Woodbrook Estate is included in the statutory Woodbrook – Shanganagh Local Area Plan (LAP) 2017-2023. The historic and environmental significance of the Estate and its environs are noted in the LAP and the Woodbrook Estate lands are zoned as Green Belt (GB) with an objective “To protect and enhance the open nature of lands between urban areas.” The Local Area Plan also identifies trees within the Estate,

including mature trees along the Dublin Road frontage, which it is an objective to protect (discussed further in Section 3.0 below).

2.5. Under Section 3.5 of the LAP dealing with the Built Heritage it states:

“Beauchamp House, The Aske, Woodbrook Estate and Corke Lodge are all close by and contribute collectively to the special character of the area with the mature trees and historic stone walls punctuated by decorative entrances and gate lodges. The conservation strategy for the Plan Area presents an opportunity to enhance and protect the areas architectural assets, as well as key elements in the historic demesne landscape which are defining characteristics of the area.”

2.6. Section 3.5.4 sets out the conservation approach states:

“The over-arching conservation approach will be to ensure that the architectural and historical significance of the Woodbrook - Shanganagh area is protected, conserved and enhanced.”

2.7. Then in the same section dealing with Visual Context and Landscape setting it states:

“The LAP promotes the sylvan historic landscape character of the Woodbrook - Shanganagh area as an important element in creating a distinct identity and sense of place.”

The National Inventory of Architectural Heritage (NIAH) and Protected Structures

2.8. There are numerous protected structures and items of architectural significance described in the NIAH located in the vicinity of Woodbrook Estate including Woodbrook House, associated walled Garden, front lodge and side lodge. The Protected Structures as listed on DLRCC’s RPS are listed below:

Protected Structure	RPS No.	NIAH
Walled garden	2090	60260158
Woodbrook House: House and Out Offices, Folly	1870	60260157
Woodbrook House Lodge: Entrance Gates & Railings (Note: Gate Lodges (2) also Protected Structures	1871	60260161
Woodbrook Front Lodge: Gate Lodge (Note: Side Lodge, Entrance Gates and Railings also Protected Structures)	1871	60260160
Woodbrook Side Lodge: Gate Lodge (Note: Front Lodge, Entrance Gates and Railings also Protected Structures	1874	60260162

Woodbrook Estate Gateway (Ref 60260161)

2.9. As set out in the NIAH: *“A gateway forming part of a neat self-contained group alongside an adjacent gate lodge with the resulting ensemble making a pleasing visual statement in a sylvan street scene at the principal entrance on to the grounds of the Woodbrook estate.”*

While the Gateway itself will not be altered, the BusConnects proposals entail new granite stone sets to the front of the gateway changing the surface treatment at this location.



Figure 2.4: image of Woodbrook Estate Gate (Source: NIAH, 2023).

Woodbrook Side Lodge (NIAH Ref 60260162)

2.10. The Woodbrook Gate Lodge (referred to as the 'Woodbrook side Lodge') is located in the south west corner of our client's landholding and proposed to be demolished and rebuilt.

2.11. The NIAH describes this building as:

"A gate lodge attributed to Frederick George Hicks (1870-1965) of Dublin (Dean 2016, 173-4) not only contributing positively to the group and setting values of the Woodbrook estate, but also clearly illustrating the continued development or "improvement" of the estate at the turn of the twentieth century with the architectural value of the composition suggested by such attributes as the compact rectilinear plan form; and the decorative timber work embellishing the roofline. Having been well maintained, the elementary form and massing survive intact together with substantial quantities of the original fabric; however, the introduction of replacement fittings to most of the openings has not had a beneficial impact on the external expression or integrity of a gate lodge making a pleasing, if largely inconspicuous visual statement in a sylvan street scene."

2.12. As noted in the development description the Woodbrook Side Lodge, a protected structure, will be demolished and rebuilt. The application notes the impact on Woodbrook Estate through the demolition of Woodbrook Side Lodge and that a new lodge is to be rebuilt in a more central position within the plot in a style similar to the existing. The boundary wall, and pedestrian and vehicle gated access points to Side Lodge are proposed to be rebuilt utilising existing materials where possible.

Woodbrook House (NIAH Ref 60260157) and associated Walled Gardens (NIAH Ref. 60260158)

2.13. Woodbrook House itself, is described as follows in the NIAH:

“A country house erected for Sir John Sheppey Ribton (1797-1877) to a design attributed to George Papworth (1781-1855) of Dublin (Pearson 1998, 39) representing an important component of the nineteenth-century domestic built heritage of south County Dublin with the architectural value of the composition, one refronting ‘the seat of — Webb Esquire...a fine house [in] a handsome well improved demesne’ (Archer 1801, 102), confirmed by such attributes as the deliberate alignment maximising on scenic vistas overlooking rolling grounds with a mountainous backdrop in the distance; the neo-Palladian plan form centred on a glazed-in pillared portico demonstrating good quality workmanship; the diminishing in scale of the openings on each floor producing a graduated visual impression with those openings showing sleek “stucco” refinements; and the Coat-of-Arms-emblazoned pediment embellishing a balustraded roofline: meanwhile, aspects of the composition clearly illustrate the continued development or “improvement” of the country house into the later twentieth century with contributions from Frederick George Hicks (1870-1965; Irish Builder 25th February 1905, 134) and Desmond FitzGerald (1911-87; Williams 1994, 391). Having been well maintained, the elementary form and massing survive intact together with substantial quantities of the original fabric, both to the exterior and to the interior where a panelled hall ‘with carving in the manner of Grinling Gibbons [1648-1721]’; a dining room showing ‘wall paintings by Francesco Zuccarelli [1702-88]’; a ballroom ‘painted in “grisaille”’ (Bence-Jones 1988, 305); contemporary joinery; chimneypieces; and plasterwork enrichments, all highlight the considerable artistic potential of the composition.”

South of the gated entrance the proposed southbound bus stop and carriageway necessitates widening in close proximity to Woodbrook which results in the loss of mature trees, with set-back of the wall also required. This will impact on the setting of the protected structure through a change in the visual amenity of the demesne and loss of vegetative screening.



Figure 2.5: image of Woodbrook House (Source: NIAH, 2023).

2.14. From the foregoing, it is clear that the Woodbrook - Shanganagh area represents a very historic and distinctive demesne landscape which is the stated policy of Dun Laoghaire

Rathdown County Council to conserve and protect. Given that the route of the proposed BusConnects scheme has significant impact on this historic landscape including the removal of numerous trees, walls and the demolition of the Side Lodge, a protected structure, it is essential that the proposals of the NTA would have due regard to, and be highly sensitive to these statutory planning policies and objectives. Accordingly, the following section assesses the compliance/compatibility of the transport proposals with these planning policies, and assesses the impact of the proposed scheme on the landscape character of the area, and in particular on the historic Woodbrook House Estate.

3.0 OVERVIEW OF SCHEME IN RELATION WOODBROOK HOUSE AND SIDE LODGE

- 3.1. We have reviewed the BusConnects proposals as they relate to Woodbrook Estate. As set out in the documentation the route runs from Loughlinstown Roundabout along the Dublin Road (R837) to St. Anne's Church and then continues south through Shankill village along the R119. It then passes through Wilford Junction and along the Dublin Road until it terminates on Castle Street in Bray. We note significant changes in proximity to Woodbrook Estate including a new signalised junction to replace the Wilford Roundabout. A segregated cycle track provided in each direction running immediately adjacent to the direction of vehicle travel.
- 3.2. Extracts of the 'General Arrangement Drawings' Sheets 49-50 (Figure 1 and 2 below) set out high level details of the route proximate to the Woodbrook Estate.
- 3.3. The proposed scheme includes a significant portion of permanent and temporary acquisition of the Woodbrook Estate. Figure 3.5 below shows relevant land parcels which are:
- 1061(7).2d - temporary acquisition of plot adjacent to Woodbrook Estate and front lodge
 - 1061(6).2d - temporary acquisition of plot adjacent to Woodbrook Estate and front lodge for substation.
 - 1061(5).2d - temporary acquisition of plot adjacent to Woodbrook Estate and front lodge for new bus stop.
 - 1061(4).2d - temporary acquisition of plot adjacent to Woodbrook Estate and front lodge for surface treatment.
 - 1061(3).1d - permanent acquisition of plot adjacent to Side Lodge for signalised junction.
 - 1060(2).2d – temporary acquisition of lands for demolition and reconstruction of Woodbrook Side Lodge.
 - 1061(2).1d permanent acquisition of plot adjacent to Woodbrook Estate and front lodge
 - 1061(2).1d - permanent acquisition of plot adjacent to Woodbrook Estate and front lodge for substation.
 - 1060(1).1d - permanent acquisition of lands at Woodbrook Side Lodge signalised junction.
 - 1061(1).1d - permanent acquisition of plot adjacent to Woodbrook Estate and front lodge
 - 1064(4).2d - permanent acquisition of land on either side of the Woodbrook entrance.
 - 1064(3).2d - temporary acquisition of land on either side of the Woodbrook entrance for construction.
 - 1064(2).1d - permanent acquisition of land on either side of the Woodbrook entrance.
 - 1064(1).1d - permanent acquisition of land on either side of the Woodbrook entrance.
 - 1067(4).2i - temporary acquisition of area to front of St. James' Church for widening and surface treatment.
 - 1067(3).2i - temporary acquisition of area to front of St. James' Church for widening and surface treatment.
 - 1067(2).2i - temporary acquisition of area to front of St. James' Church for widening and surface treatment.
 - 1067(1).1i - permanent acquisition of area to front of St. James' Church for widening and surface treatment.

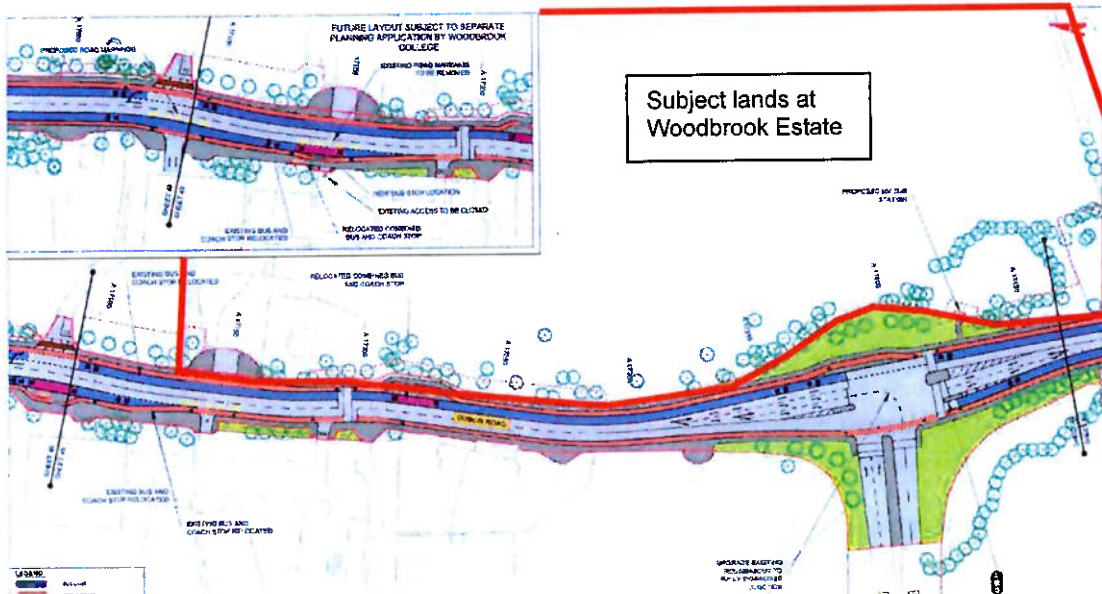


Figure 3.1: Extract from General Arrangement Sheet 49 (Source: NTA, 2023) with redline illustrating Woodbrook Estate.

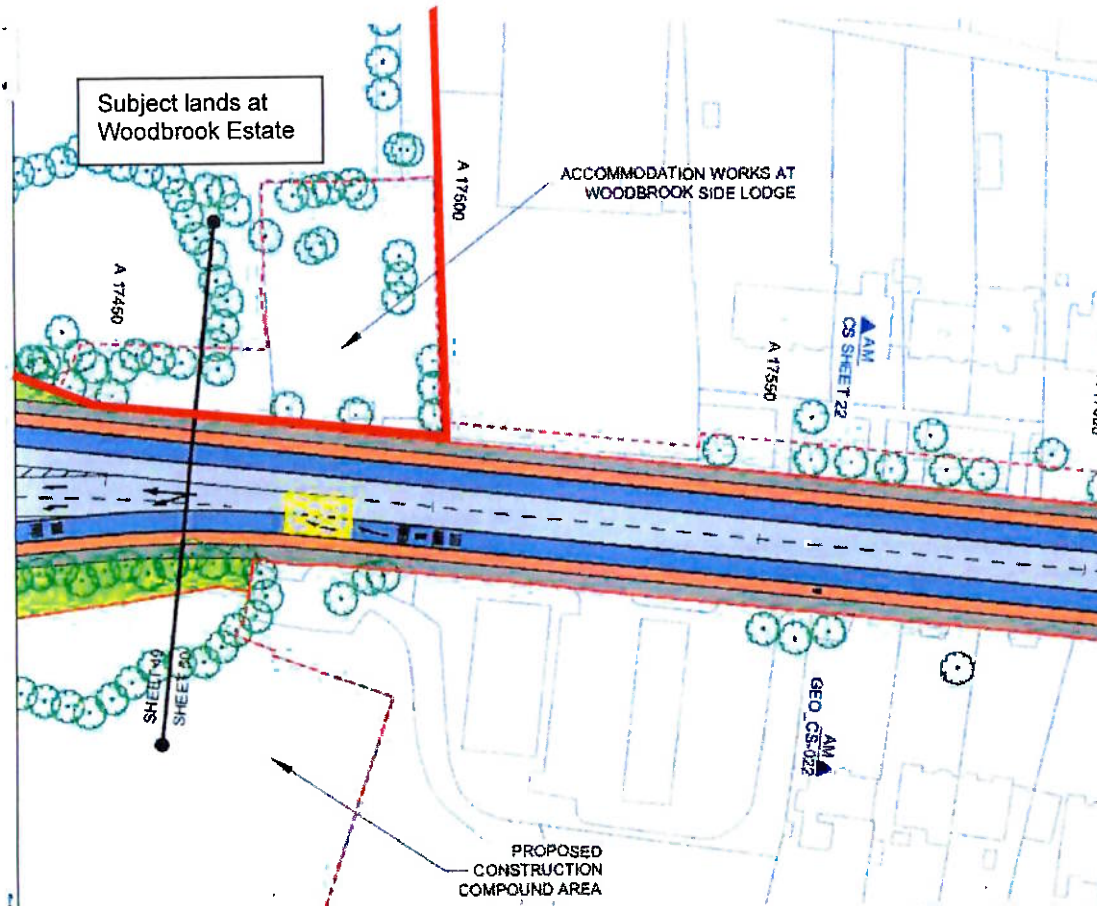


Figure 3.2: Extract from General Arrangement Sheet 50 (Source: NTA, 2023) with redline illustrating Woodbrook Estate.

3.4. The application documentation notes the impact on Woodbrook Estate through the demolition of Woodbrook Side Lodge, a protected structure, and that a new lodge is to be rebuilt. The boundary wall, and pedestrian and vehicle gated access points to Side Lodge are proposed to be rebuilt utilising existing materials where possible.

- 3.5. Enclosed landscaping drawings details sets out trees proposed to be removed along the boundary with the Woodbrook Estate primarily on the eastern side of the Dublin Road. Annotation on the drawing states that existing wall, trees and vegetation up to 4m from the wall to be removed. The wall is to be set back and re-built.
- 3.6. The alignment through this section entails significant tree loss along the frontage with Woodbrook Estate back. Replacement native planting is proposed to re-establish the vegetation belt along this side however the nature and extent of this planting is not clear. The existing wall is to be demolished and set back proposed wall reinstatement north of the M11 diverge junction will be detailed to match the stone material seen elsewhere along this section.
- 3.7. The drawing also notes: *'Stone setts and wide granite kerbs to enhance historic gated entrance into Woodbrook estate.'*
- 3.8. Figures 3.3 and 3.4 below illustrate the extent of landscaping proposals and the consequent loss of trees proposed.
- 3.9. The proposal states that the historic gated entrance into the Woodbrook Estate remains unaffected by any carriageway widening. The landscape drawing notes: *'Stone setts and wide granite kerbs to enhance historic gated entrance into Woodbrook estate' are proposed which are considered a positive intervention.'*

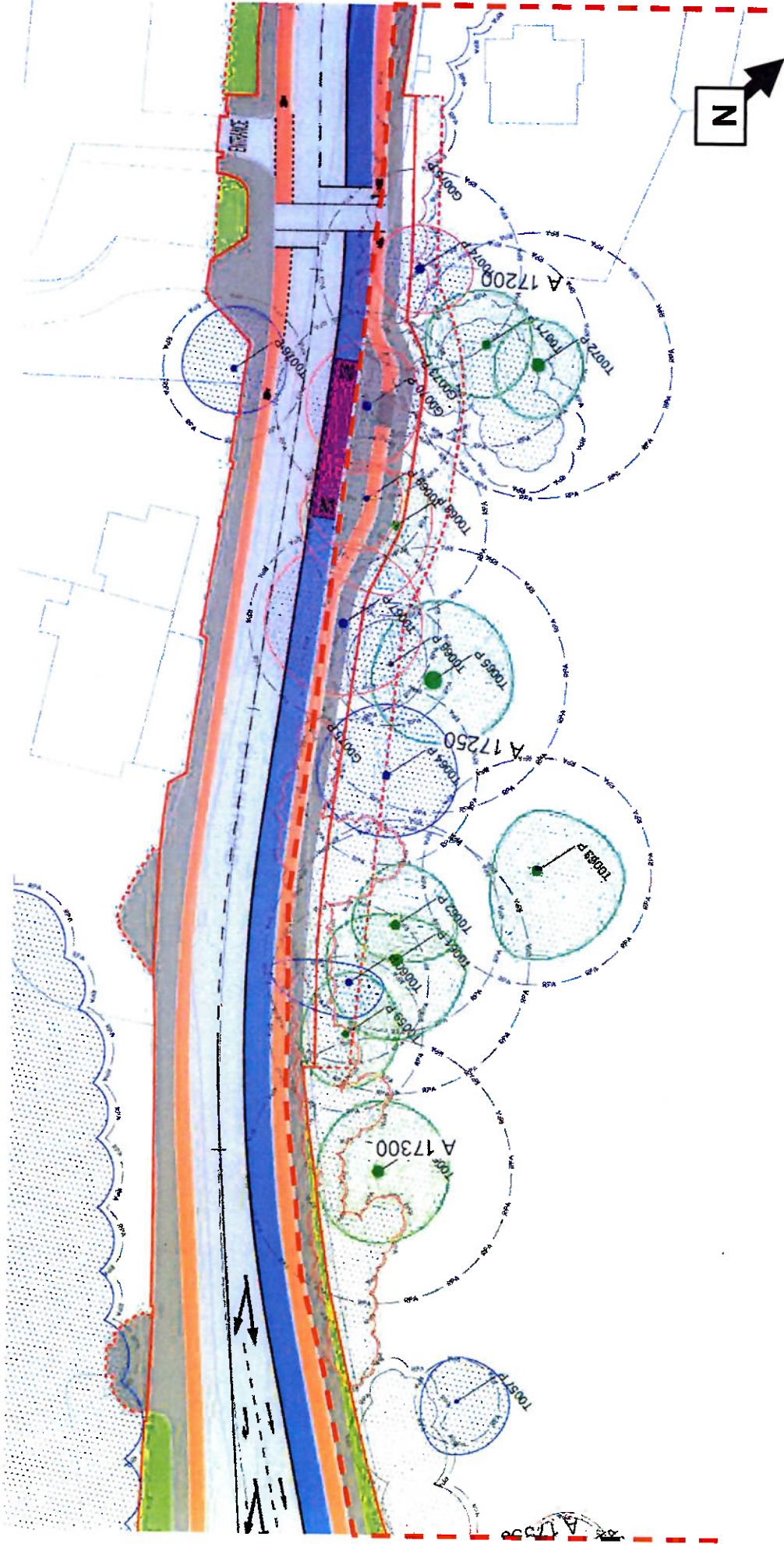


Figure 3.4: Extract from Appendix D Arboricultural Impact Assessment (Source: NTA, 2023) with redline illustrating Woodbrook Estate property



Figure 3.5: Extract from Deposit Map indicating relevant land parcels. (Source: NTA, 2023)

4.0 PLANNING POLICY CONTEXT

- 4.1. The lands are located within the administrative boundary of Dun Laoghaire-Rathdown County Council and are subject to the policies and objectives contained with the Dun Laoghaire-Rathdown County Development Plan 2022-2028. It is also noted that the lands are located within the development boundary of Woodbrook - Shanganagh LAP 2017-2023. This Plan was extended by a five year period from the 11th October 2022.

Architectural Heritage Protection Guidelines (2011)

- 4.2. We note the following relevant text from the Guidelines regarding the importance of landscaping features includes woodlands to protected structures:

“Planted features

13.4.22 - Within the curtilage and/or attendant grounds of a protected structure there may be planted features which are important to the character and special interest of the structure and which contribute to its setting. These could include tree-lined avenues, decorative tree-clumps, woodlands, species plants or plant collections”.

“Development within historic woodlands

13.7.3 - Development proposals should have regard to the planted features of designed landscapes and efforts should be made to reinforce or to re-establish important structural planting such as avenues or clumps of trees, plantations, woodlands, hedging or shelter belts”.

Dun Laoghaire-Rathdown County Development Plan 2022-2028

- 4.3. The lands are located within the administrative boundary of Dun Laoghaire-Rathdown County Council and are subject to the policies and objectives contained with the Dun Laoghaire-Rathdown County Development Plan 2022-2028.

Zoning

- 4.4. The subject lands are zoned Objective GB which has the stated aim ‘*To protect and enhance the open nature of lands between urban area*’.
- 4.5. As evident on Figure 4.1 below there are a large number of objectives ‘*To protect and preserve Trees and Woodland*’ located on the Woodbrook Estate along the frontage with the Dublin Road.



To protect and preserve Trees and Woodlands 


Objective GB To protect and enhance the open nature of lands between urban areas. 

Figure 4.1: extract from zoning map 14

4.6. Section 12.8.11 relates to 'Existing Trees and Hedgerows' states:

New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. New developments shall, also have regard to objectives to protect and preserve trees and woodlands (as identified on the County Development Plan Maps). The tree symbols on the maps may represent an individual tree or a cluster of trees and are not an absolute commitment to preservation. Decisions on preservation are made subject to full Arboricultural Assessment and having regard to other objectives of the Plan.

4.7. Generally, the Council will seek to preserve trees, groups of trees and/or woodlands that form significant features in the landscape, and/or are important in setting the character, amenity, or ecology of an area. As part of the Development Plan, the Council Parks Department carried out a comprehensive review of the tree symbols on the 14 County Development Plan Maps. As evident in Figure 4.1 above there are many such symbols relevant to Woodbrook Estate.

4.8. Section 11.4.1.2 relates to 'Work to Protected Structures' Policy Objective HER8 states:

"It is a Policy Objective to:

- i. Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- ii. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' published by the Department of the Arts, Heritage and the Gaeltacht.*
- iii. Ensure that all works are carried out under supervision of a qualified professional with specialised conservation expertise.*
- iv. Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials.*
- v. Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.*
- vi. Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials.*
- vii. Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.*
- viii. Protect the curtilage of protected structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds that would adversely impact on the special character of the Protected Structure.*
- ix. Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- x. Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development (consistent with NPO 17 of the NPF and RPO 9.30 of the RSES)."*

- 4.9. In particular the Development Plan notes that *"Demolition, partial demolition, or significant removal of structural fabric of rear returns is not generally acceptable. Where a rear return forms part of a unified terrace and/or contributes to its architectural character, any works that will disrupt or distort the uniformity should be avoided."* The Development Plan provides a range of considerations for works to a protected structure and measures to protect their special interest and value.

Woodbrook - Shanganagh LAP 2017-2023

- 4.10. We note the following relevant provisions of the LAP. In regard to landscape the LAP states:

"The Landscape focus of this Local Area Plan is in part contingent upon the retention and supplementing of key landscape features such as mature trees, hedgerows water features and original boundary treatments."

- 4.11. Under Section 3.5.5 of the LAP it sets out 8 No. specific Built Heritage Objectives. In particular we note:

- *BH1: To ensure the provision of high quality public realm works that embody the demesne and landscape character heritage of the area.*

- *BH2: To ensure that new development respects the significance of the Protected Structures and represents an appropriate response to their historic spatial context and landscape setting.*
- *BH5: To seek to retain key historic landscape features*

4.12. Under Section 3.5 of the LAP states:

“Beauchamp House, The Aske, Woodbrook Estate and Corke Lodge are all close by and contribute collectively to the special character of the area with the mature trees and historic stone walls punctuated by decorative entrances and gate lodges. The conservation strategy for the Plan Area presents an opportunity to enhance and protect the areas architectural assets, as well as key elements in the historic demesne landscape which are defining characteristics of the area.”

4.13. Section 3.5.4 states:

“The over-arching conservation approach will be to ensure that the architectural and historical significance of the Woodbrook - Shanganagh area is protected, conserved and enhanced.”

4.14. Section 3.5.4 states Visual Context and Landscape setting it states:

“The LAP promotes the sylvan historic landscape character of the Woodbrook - Shanganagh area as an important element in creating a distinct identity and sense of place.”

4.15. Similarly, Objective T8 states:

“To seek to retain the sylvan character of the Dublin Road in any road improvement schemes and to ensure that any loss of mature trees will be mitigated by replacement tree planting with consideration also to the reinstatement of any historic walls or features along any new road alignment.”

4.16. The LAP states the following regarding road widening schemes:

“Nonetheless, in the event of any road widening or road improvement scheme along the Dublin Road, the Council will seek to retain its sylvan character and to this end, will give consideration in the first instance to innovative design solutions which allow for retention of a significant proportion of the existing mature trees and historic boundary walls in situ. Design solutions may include the provision of publicly accessible pedestrian / cycle routes internal to the two respective development parcels.

In the event that road widening is considered necessary to meet the requirements of the NTA / TII, as may arise from the on-going Corridor Studies or otherwise, the Council will promote the planting of replacement semi-mature trees and re-instatement of any historic boundary walls or features, as appropriate. In addition, any loss of trees arising from essential road widening will be mitigated by proposed new tree belts to be provided to a substantial depth along the road frontage in each of the development parcels and as part of Master Plan proposals for Shanganagh Park”.

4.17. From the foregoing, it is clear that the Woodbrook - Shanganagh area represents a very historic and distinctive demesne landscape which is clearly set out in the

Development Plan and the LAP. Given the historic sensitivity and the mature nature of the existing trees, it is essential that the proposals of the NTA would have due regard to, and be highly sensitive to these statutory planning policies and objectives. Accordingly, the following section assesses the compliance/compatibility of the transport proposals with these planning policies, and assesses the impact of the proposed bus corridor on the landscape character of the area, and in particular on the historic Woodbrook House Estate.

5.0 BUILT HERITAGE

- 5.1. This submission now seeks to address the built heritage considerations of the BusConnects proposals in greater detail. An Environmental Impact Assessment Report was submitted with the application documentation which assesses the impact of the proposals, including in the impact on built heritage (Chapter 16).
- 5.2. There are a large number of references to Woodbrook Estate and associated Protected Structures and items of heritage significance in the area.
- 5.3. In terms of impacts on our client property, the EIAR notes that: *“The proposed land take on the east side of the Dublin Road to the south of the Front Lodge (DLR RPS 1871) to Woodbrook House (DLR RPS 1870, NIAH 5676) will necessitate the removal of the boundary wall. For the most part, this boundary wall is a replacement rather than the original demesne wall. The northern sections of this wall, located at the gate lodge appears to be original, however. **The predicted pre-mitigation Construction Phase impact is Direct, Negative, Slight and Temporary.** Mitigation includes recording the existing fabric in position prior to the works, labelling the affected masonry and fabric. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. The architectural heritage specialist will oversee any labelling, taking-down and reinstatement of the affected masonry. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric in Volume 4 of this EIAR. **With mitigation, the impact magnitude is reduced from Medium to Low. The predicted post mitigation impact is Direct, Negative, Not Significant and Long-Term”** (Our emphasis.)*
- 5.4. Appendix A16.2 sets out a very detailed list of features of architectural heritage including a ‘Photographic Survey of Woodbrook Side Lodge’.
- 5.5. The EIAR states:

Section	Assessment Topic	Predicted Impact (Pre-Mitigation and Monitoring)	Predicted Impact (Post Mitigation and Monitoring)
	Demesne wall of Corke Lodge	Direct, Negative, Moderate, Temporary	Direct, Negative, Slight, Long-Term
	CBC0013BTH024, NIAH 5676, The demesne wall of Woodbrook House Demesne	Direct, Negative, Moderate, Temporary	Direct, Negative, Slight, Long-Term
	NIAH 5676 The replacement boundary wall to Woodbrook House Demesne	Direct, Negative, Slight, Temporary	Direct, Negative, Not Significant, Long-Term
Bray North (Wilford Roundabout) to Bray South (Fran O’Toole Bridge) †	DLR RPS 1874, NIAH 5676, CBC0013BTH021 Woodbrook Side Lodge, boundary wall and entrance gates	{Worst-case scenario} Direct, Negative, Significant, Permanent	{Worst-case scenario} Direct, Negative, Significant, Permanent
	DLR RPS 1874, NIAH 5676, CBC0013BTH021 Woodbrook Side Lodge, boundary wall and entrance gates	{Construction of new lodge} Direct, Negative, Significant, Permanent	{Construction of new lodge} Direct, Negative, Moderate, Permanent

Figure 5.1: Extract from Table 16.18: Predicted Construction Phase Impacts Following the Implementation of Mitigation and Monitoring Measures

- 5.6. Section 16.6 outlines residual construction and operation of the scheme. Section 16.6.1 states:

“It is anticipated that there will be significant residual impacts at Woodbrook Side Lodge as a result of the Construction Phase of the Proposed Scheme.

They are summarised in Table 16.19. It is proposed to construct a new Woodbrook Side Lodge (DLR RPS 1874) building and relocate the associated boundary wall, dressed granite pedestrian gateway and entrance gates (CBC0013BTH021) to the east of their current location. The lodge is associated with the secondary entrance to Woodbrook House (DLR RPS 1870, NIAH 60260157) and forms part of the demesne landscape (NIAH 5676). A new lodge building and the reconstruction of the associated boundary features, will maintain their relationship (albeit altered), with Woodbrook House and its demesne landscape. The predicted residual impact is Direct, Negative, Moderate and Permanent. Under a worst-case scenario, Woodbrook Side Lodge (DLR RPS 1874) will be demolished without replacement resulting in the total loss of the lodge. There is very limited scope for mitigation, involving only the relocation of the associated boundary wall to the demesne landscape of Woodbrook House (NIAH 5676), dressed granite pedestrian gateway and entrance gates (CBC0013BTH021). The predicted residual impact in that worst-case scenario is Direct, Negative, Significant and Permanent.”

Table 16.19: Construction Phase Significant Residual Impacts

Section	Assessment Topic	Predicted Residual Impact
Bray North (Wilford Roundabout) to Bray South (Fran O’Toole Bridge)	DLR RPS 1874, NIAH 5676, CBC0013BTH021 Woodbrook Side Lodge, boundary wall and entrance gates	(Worst-case scenario) Direct, Negative, Significant, Permanent
	DLR RPS 1874, NIAH 5676, CBC0013BTH021 Woodbrook Side Lodge, boundary wall and entrance gates	(Construction of new lodge) Direct, Negative, Moderate, Permanent

Figure 5.2: Extract from Table 16.19: Construction Phase Significant Residual Impacts

- 5.7. In terms of operation the residual impacts are characterised as follows: *“Given that the impact on the Woodbrook Side Lodge during the Construction Phase is Permanent, those impacts will continue into the Operational Phase. There will therefore continue to be a residual Negative, Moderate, Permanent impact on the Woodbrook Side Lodge following reinstatement of boundary walls and construction of the new lodge building.”*
- 5.8. The EIAR identifies the impact on built heritage as significant, permanent and negative due to a number of impacts in particular including the Woodbrook Lodge Reconstruction.

Woodbrook Lodge Reconstruction

- 5.9. Our client is the owner of Woodbrook Side Lodge, a protected structure, which is proposed to be demolished and rebuilt. The EIAR Volume 4 of 4 Appendix A16.3 sets out the impact of the proposed reconstruction of Woodbrook Lodge, stating:

“It is proposed to construct a replacement lodge further to the east within the existing site. The proposed lodge building will be larger than the existing structure so that it is compliant with current Building Regulations (existing building footprint is approximately 56m², proposed building footprint is approximately 79m²). The existing lodge gates and boundary wall have been inspected internally and externally to assess current condition. Drawn and photographic surveys have also been undertaken (refer to Appendix A16.4 in Volume 4 of this EIAR). In addition to the record and surveys already undertaken, mitigation during the Construction Phase includes labelling the affected masonry,

brickwork, and joinery prior to their careful dismantling and removal to safe storage by the appointed contractor. Architectural heritage features such as bricks, timber barge boards and the stone plaques on the gables will be salvaged from the existing lodge. Where the bricks, bargeboards and stone plaques are found to be in good condition and suitable for anastylosis they will be incorporated in the new structure as detailed in the engineers drawings and photographic record.”

5.10. The EIAR clearly identifies significant, permanent negative and direct impact on Woodbrook Side Lodge.

Section	Assessment Topic	Feature Sensitivity	Impact Magnitude	Potential Impact
	House			
	CBC0013BTH025, DLR RPS 1869 Demesne wall of Corke Lodge	Medium	Medium	Direct, Negative, Moderate, Temporary
	CBC0013BTH024, NIAH 5676, The demesne wall of Woodbrook House Demesne	Medium	Medium	Direct, Negative, Moderate, Temporary
	NIAH 5676 The replacement boundary wall to Woodbrook House Demesne	Low	Low	Direct, Negative, Slight, Temporary
Bray North (Willford Roundabout) to Bray South (Fran O'Toole Bridge)	NIAH 2571, DLR RPS 1873 The former demesne of Willford House	Medium	Negligible	Direct, Negative, Not Significant, Temporary
	DLR RPS 1874, NIAH 5676, CBC0013BTH021 Woodbrook Side Lodge, boundary wall and entrance gates	Medium	High	(Worst-case scenario) Direct, Negative, Significant, Permanent
	DLR RPS 1874, NIAH 5676, CBC0013BTH021 Woodbrook Side Lodge, boundary wall and entrance gates	Medium	High	(Construction of new lodge) Direct, Negative, Significant, Permanent

Figure 5.3: Extract from Table 16.16: Summary of Potential Construction Phase Impact

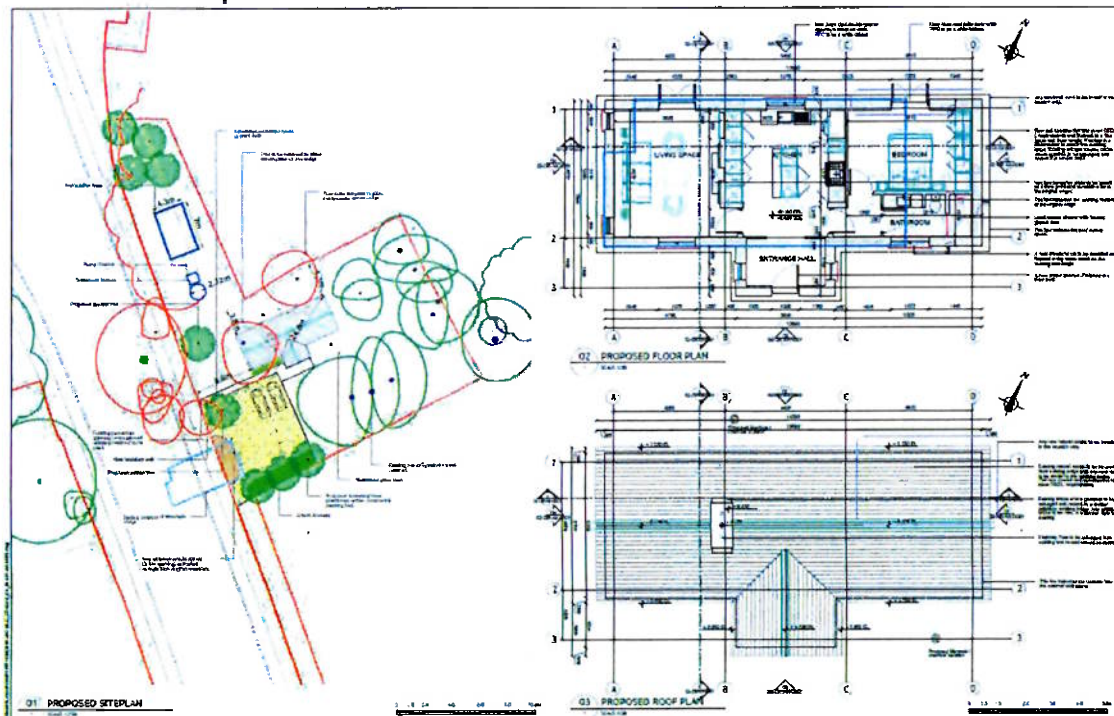


Figure 5.4: Extract from '20.-Woodbrook-Side-Lodge-General-Arrangement-1' (Source: NTA, 2023).

- 5.11. The proposal notes that the historic gated entrance into the Woodbrook Estate remains unaffected by any carriageway widening. The landscape drawing notes: *'Stone setts and wide granite kerbs to enhance historic gated entrance into Woodbrook estate'* are proposed which are considered a positive intervention.
- 5.12. In terms of built heritage, the EIAR notes the *"proposed land take on the east side of the Dublin Road to the south of the Front Lodge (DLR RPS 1871) to Woodbrook House (DLR RPS 1870, NIAH 5676) will necessitate the removal and replacement of the boundary wall. Following mitigation, the impact magnitude is characterised as Low."*
- 5.13. In terms of the impacts of the reconstruction of Woodbrook Side Lodge, the EIAR states that given that the impact on the Woodbrook Side Lodge during the Construction Phase is permanent, those impacts will continue into the Operational Phase. There will therefore continue to be a residual Negative, Moderate, Permanent impact on the Woodbrook Side Lodge following reinstatement of boundary walls and construction of the new lodge building.
- 5.14. We note the provisions of Section 57(10)(b) of the Planning and Development Act (as amended) which states:
- "A planning authority, or the Board on appeal, shall not grant permission for the demolition of a protected structure or proposed protected structure, save in exceptional circumstances."*
- 5.15. We do not consider that the application has sufficiently demonstrated that exceptional circumstances apply which justify the demolition of the Woodbrook Side Lodge protected structure as there are alternatives that may be possible as demonstrated by accompanying NRB report.
- 5.16. The demesne and boundary forms part of the Woodbrook House Protected Structure and associated Estate. As such, the proposals will both directly impact the Protected Structures of Woodbrook Estate. Our client has concerns that the new boundary wall will not be constructed as a like for like replacement. Having regard to the foregoing, it is requested that the boundary treatments to the front of the property are agreed with the owner of Woodbrook House prior to construction, should the scheme be approved.

6.0 VISUAL & LANDSCAPE ASSESSMENT

- 6.1. In terms of visual and townscape impacts, the scheme will result in significant change as a result of the widening of the road corridor to accommodate bus and cycle lanes. This entails land take from Woodbrook Estate and a setting back and reinstatement in a like-for-like style of boundary walls. As highlighted above, there is substantial loss of existing mature trees along this section.
- 6.2. The application contains a series of photomontages detailing 'before and after' imagery. In particular View 04-07 are of direct relevance to the Woodbrook Estate. Each view looks north towards Shankill.
- 6.3. In regard to View 04, the EIAR states:

“Figure 17.2.4.2 shows the proposed view from Dublin Road at Circle K in Bray, looking north. The primary change in the view is widening of the road to the east with the demolition and rebuilding of Woodbrook Side Lodge and the removal of some mature trees within Woodbrook Estate. The boundary wall is set back and reinstated like-for-like, and replacement tree planting is provided with the grounds. The totem sign is moved outside of the field of view. There is a reduction in the visual amenity of the view.”

- 6.4. View 4 Illustrates the new signalised junction, boundary setback, the reconstruction of Woodbrook Side Lodge and the general removal of trees.



Figure 6.1: Extract from photomontage View 4 proposed looking north (Source: NTA, 2023) including Woodbrook Side Lodge reconstruction.

- 6.5. In regard to View 05, the EIAR states:

“Figure 17.2.5.2 shows the proposed view from Dublin Road, south of Woodbrook College looking north. The primary change is the provision of a new bus stop and cycle tracks with land take from Woodbrook Estate. The existing wall, trees and vegetation, to a width of 4m, are removed from the estate. The wall is set back and rebuilt in stone to match the other boundary walls along this section of Dublin Road. Some existing mature trees are retained and new trees

are provided to consolidate the edge of the estate. **There will be a neutral change to visual amenity once replacement planting is established.**”



Figure 6.2: Extract from photomontage View 5 proposed looking north (Source: NTA, 2023).

6.6. In regard to View 06, the EIAR states:

“Figure 17.2.6.2 shows the proposed view from Dublin Road at Woodbrook looking north. The primary change to the view is the widening of the road to the right (east) side with removal of a section of mature woodland, setting back of the boundary wall and reinstatement in similar stone construction. Trees further back in the woodland are retained and there is replacement tree planting to consolidate the woodland edge. The entrance to The Aske is not impacted. There is a negative change to the visual amenity of the view, but this will reduce as proposed planting matures further.”



Figure 6.3: Extract from photomontage View 6 proposed looking north (Source: NTA, 2023). (Aske visible on the left of the photo)

- 6.7. Enclosed landscaping drawings clarify the trees proposed to be removed along the boundary with the Woodbrook Estate primarily on the eastern side of the Dublin Road. Annotation on the drawing states that existing wall, trees and vegetation up to 4m from the wall to be removed.
- 6.8. As is clear from the above text and the accompanying photomontages the EIAR has identified significant permanent, negative change and impact along the Dublin Road including the widening of the road to the east side with removal of a section of mature woodland, the removal of the existing boundary wall and to be replaced by a new set boundary wall..
- 6.9. The Woodbrook Estate is a historically important estate in a sylvan setting between Bray and Shankill. The R119 Dublin Road passing the western boundary of the estate is a relatively undeveloped roadway with historic boundary walls, gate lodges and mature trees lining both sides of the roadway. The road widening proposals as currently envisaged for the BusConnects project would result in the removal of notable boundary treatment and a significant number of mature trees. This would have a significantly negative visual impact of the Woodbrook Estate and its setting within the wider landscape of the area.
- 6.10. The boundary wall is to be set back and reinstated as like-for-like. Landscape drawings note replacement tree planting to be provided within the grounds. It is not clear if mature planting is proposed or if photomontages reflect the growth of these trees after a number of years. Should mature planting not be proposed, the Photomontages may misrepresent the anticipated impacts. Chapter 4 states that where road widening is proposed that 'like for like' replacement is proposed however we request additional certainty be provided in regard to the maturity of the proposed planting proposed. This will have a direct impact on the visual amenity of the area as planting can take some years to mature and have the desired visual screening affect.

7.0 TRAFFIC & ROAD DESIGN ASSESSMENT

- 7.1. A Traffic & Road Design Assessment of the scheme has been carried out by NRB Consulting Engineers Ltd, and their full report is contained in Appendix 2. The main findings from their assessment are summarised below.
- 7.2. In the vicinity of the subject lands, the proposed Route proposals includes plans to widen the Dublin Road so as to provide a 2m minimum width footpath, a 2m cycle track, a 3m bus lane and a 3m traffic lane in each direction. This is an overall width of 20m.
- 7.3. As a result it is required to set back much of the boundary to Woodbrook Estate property as shown on General Arrangement Sheet 49/50 and the demolition of the "Side Lodge" Protected Structure.
- 7.4. This in turn would involve the removal of a large number of the existing line of mature trees which currently run along the entire Woodbrook estate road frontage to the Dublin Road. Details of the proposed land take are illustrated on drawing NRB-SK-001 included in Appendix 2. The proposed land take is significant over a ~500m section of the Dublin Road site frontage. Such extensive land take is considered both excessive and unnecessary.
- 7.5. We note that at other sections of the proposed route there are sections of the route where the bus lane is omitted in one direction or in its entirety and other sections where the cyclists share the bus lane.
- 7.6. As set out by NRB, it is submitted that the appropriate option for this section, with far less impact on the historic lands and features of Woodbrook Estate, would be to utilise a shared cycle & bus lane on both sides of the road, or a 'signal controlled priority' similar to other sections of the proposed route e.g. in Donnybrook where the scheme varies between 1 and 2 lanes. Unlike the offline cycle lane option proposed at Shankill, which is less direct and longer and therefore less attractive to cyclists, this provides a direct route to cyclists while reducing the impact on Woodbrook Estate. This could be combined with a reduction in Speed Limit to 30kph along the Dublin Road here which we also believe to be appropriate. This could be achieved with significantly reduced impact upon the property and reduced Core Corridor land acquisition/compensation and construction costs associated with this alternative arrangement.
- 7.7. This alternative layout option is shown on NRB-SK-23-01 (see Appendix 2 for details). A localised ~2m deep land take along a ~16m section of third-party property opposite Woodbrook Estate would reduce the land take on a ~150m long section of the Woodbrook estate north of the existing pedestrian crossing while making use of the existing public road lands. This shared cycle & bus lane option should also be used at the "Side Lodge" protected structure to reduce the impact of the Bus Connects proposals. With further detailed design and some localised adjustment of the alignment, the proposal to demolish this protected structure could and should be avoided.

8.0 CONCLUSION

- 8.1. To facilitate the proposed development a dedicated bus and cycle lanes necessitates the removal of considerable sections of the Woodbrook Estate boundary walls, together with the removal of a large number of mature trees which line the road frontage. The road widening line also requires the demolition of the Woodbrook Side Lodge, a protected structure. Given that these stone boundary walls and mature trees contribute significantly to the overall architectural and landscape character of the Woodbrook area, their removal would be contrary to the conservation policies of the Dun Laoghaire Rathdown County Development Plan 2022-2028 and the Woodbrook – Shanganagh Local Area Plan (LAP) 2017-2023, as would the demolition of the side lodge, which is a Protected Structure.
- 8.2. Our client has engaged extensively with the NTA through public consultations and direct discussion. Suggested amendments to previous iterations have not been taken into account as part of the current designs before the Board.
- 8.3. Under the Development Plan, the Woodbrook Estate lands are zoned as Green Belt (GB) with an objective *“To protect and enhance the open nature of lands between urban areas.”* The Development Plan also identifies trees within the Estate, including mature trees along the Dublin Road frontage, which it is an objective to protect.
- 8.4. Our client’s key concerns can be summarised as follows:
- Significant Impacts on Woodbrook Estate and the protected structures as a result of the removal of the historic boundary wall and the demolition of Woodbrook Side Lodge, a protected structure.
 - Significant removal of mature trees within the curtilage of a protected structure (impact on sylvan character of the area).
 - Resulting non compliance with policies and objectives of the Shanganagh-Woodbrook Shanganagh Local Area Plan (2017-2023) and the policies and objectives of the Dun Laoghaire-Rathdown County Development Plan 2022-2028.
- 8.5. As is clear from the above text and the accompanying photomontages the EIAR has identified significant permanent, negative change and impact along the Dublin Road including the widening of the road to the east side with removal of a section of mature woodland, demolition of Woodbrook Side Lodge, setting back of the boundary wall and reinstatement in similar stone construction.
- 8.6. On the basis of the above highlighted impacts we request that the Board require amendment to the scheme by requesting revised drawings from the applicant as follows:
- 8.7. The Traffic & Road Design Assessment of the proposed bus route fronting the Woodbrook Estate was also undertaken by NRB Consulting Engineers. They have found that an alternative layout as shown on NRB-SK-01-23 which significantly reduces the impact on the property. Such land take in this sensitive historic area is considered to be both excessive and unnecessary.
- 8.8. It is submitted that the appropriate option for this section of the scheme would be to utilise a shared cycle & bus lane on both sides of the road. This could be

combined with a reduction in Speed Limit to 30 kph along the Dublin Road here which it is submitted would be appropriate.

- 8.9. We request that ABP request that the Applicant provide revised drawings of the proposal as detailed in this submission, and in particular, an alternative layout which significantly reduces the impact on the historic and sensitive landscape of the Woodbrook area, retaining the Woodbrook Side Lodge, a protected structure.
- 8.10. Alternatively, should the Board be minded to approve the proposal we request that these amendments to the layout and design as set out by NRB with a shared cycle and bus lane on both sides of the road in order to avoid the adverse consequences of the removal demesne walls, a large number of mature trees, the Protected Structure (Side Lodge) together with the environmental consequences as highlighted and set out in this submission should be required by way of condition, including additional mature planting.
- 8.11. If, notwithstanding this submission, the Board is minded to approve the proposal without alteration, it is requested that the reconstruction of the Side Lodge be required by Condition and that these works be completed within 1 year of its demolition.
- 8.12. The boundary wall is proposed to be set back and reinstated as 'like-for-like'. While replacement tree planting is noted within the grounds. It is not clear if mature planting is proposed or if photomontages reflect the growth of these trees after a number of years. Chapter 4 states that where road widening is proposed that 'like for like' replacement is proposed.
- 8.13. Should the Board be minded to approve the proposal, it is requested that the boundary treatments and planting to the front of the property are agreed with the owner of Woodbrook Estate prior to construction.

APPENDIX 1

**LANDSCAPE & VISUAL IMPACTS OF BUS CONNECTS PROPOSALS ON
WOODBROOK ESTATE FRONTAGE
(2019 submission with associated letter)**

Prepared By Doyle & O'Troithigh Landscape Architecture

Date: 9th October 2023
Project No: 19-036
Project: Route 13 Bray to City Centre Bus Connects

Re: Preferred Route Landscape and Visual Impacts of the route on the Woodbrook Estate.

FAO: An Bord Pleanala
64 Marlborough St
Rotunda
Dublin 1

Doyle + O'Troithigh Landscape Architects Ltd, were the appointed project Landscape Architects for the preparation of a Landscape and Visual Impact report of the route on the Woodbrook Estate, see attached submitted assessment report.

Following receipt of the final route we have undertaken a further review and confirm that the impact of the route remains consistent with the 2019 assessment.

Yours sincerely



Daithi O'Troithigh
doyle + o'troithigh landscape – architecture Ltd.

LANDSCAPE & VISUAL IMPACTS OF BUS CONNECTS PROPOSALS ON WOODBROOK ESTATE FRONTAGE



Introduction

Doyle & O'Troithigh Landscape Architects were asked to examine the development proposals for the Route 13 Bray to City Centre BusConnects Preferred Route (Maps 50 to 52) and the Landscape & Visual impacts to the frontage of the Woodbrook Estate.

The Woodbrook Estate lies on the northern fringe of Bray Co. Wicklow and the R119 Dublin Road passes along the western boundary of the estate. Woodbrook House dates back to 1835 and other buildings on the estate include Corke Lodge and stables (1810). The walled garden (1700-1837) is an important historical landscape feature associated with the estate. The house is surrounded by open grazing fields with copses of trees dotted across the estate.



Image 1- Woodbrook House viewed from the western boundary

The R119 Dublin Road from the M11 access roundabout to Shankill Village has an enduring historical appearance with St James’ Church, granite boundary walls and gate lodges all flanked by mature tree stands on both sides of the roadway. The development proposals would require the removal of historical estate stone walls and significant numbers of mature trees close to the roadway significantly altering the environment of the roadway.

The Woodbrook Estate contains a number of listed buildings and architectural features as shown in Fig. 1. The setting of the house and associated landscape features is provided with the existing tree and hedgerow screening along the R119 boundary. Removal of this screening will create a negative visual impact on the listed buildings and grounds of the estate.

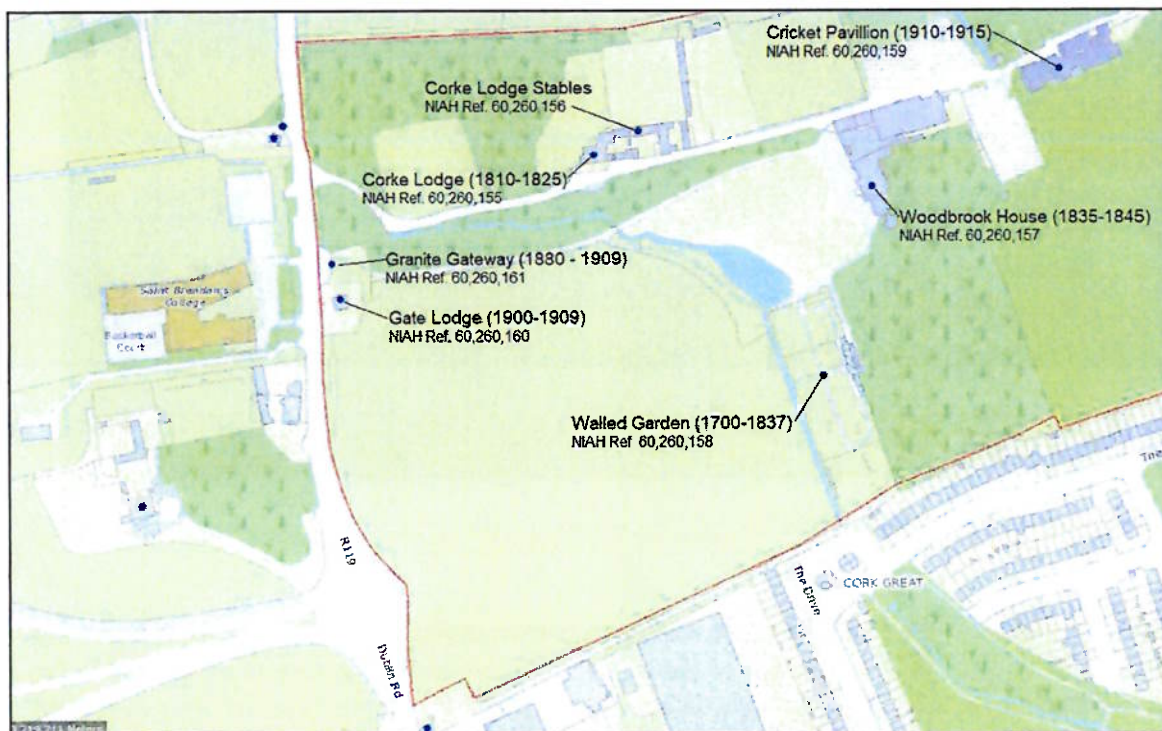


Fig. 1 - Woodbrook Estate – Listed National Inventory of Historical Architecture

IMPACTS ON MATURE TREES

NORTHERN SECTION

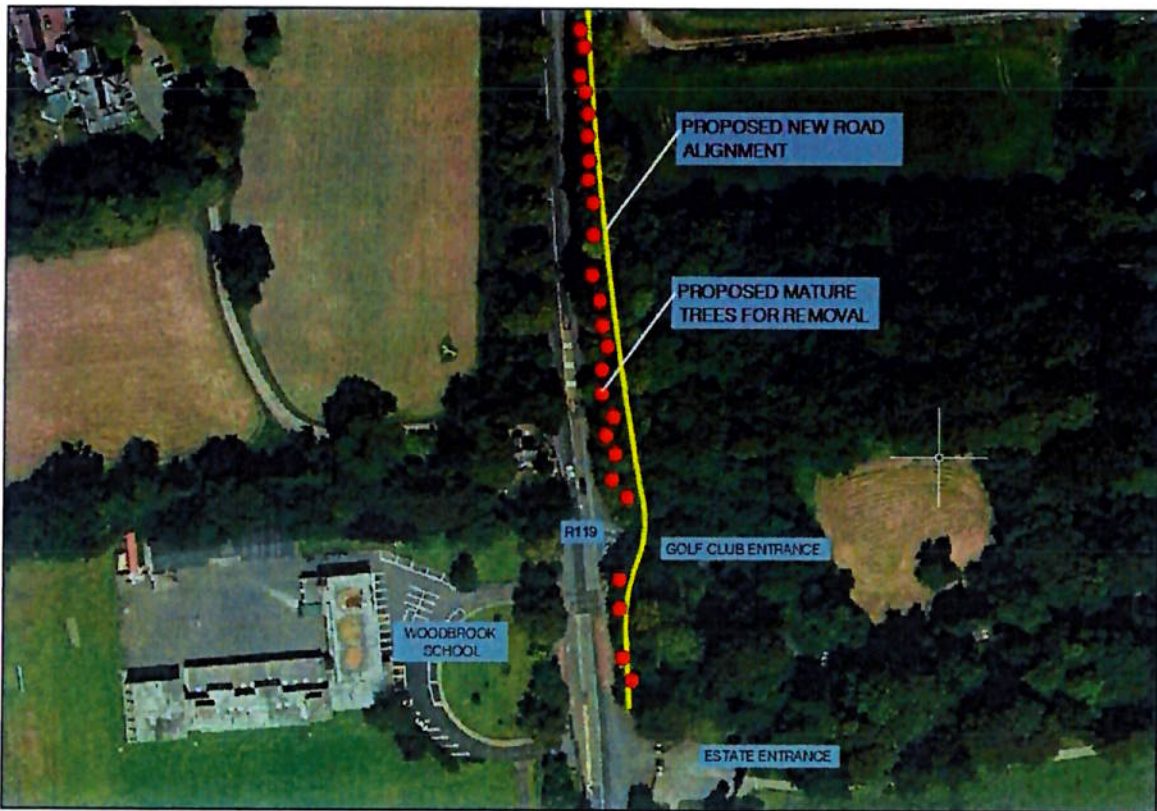


Fig. 2 – Northern section of Estate frontage

The northern section of the estate frontage includes a narrow group of trees with open fields to the rear and a section with dense mature woodland. The trees are mainly mature Chestnut (*Aesculus hippocastaneum*) up to 20M in height and with several mature Beech (*Fagus sylvatica*) also up to 20M in height. All the trees are within 5M of the boundary wall. There is also of a stone lined feature which runs at right angles to the boundary wall and there is a height differential between one side and the other.



Image 2- Woodbrook Estate northern section as viewed from the Dublin Road.

The condition of the trees while mature is generally good with few fallen trees and branches partially due to the fact that the area has been undisturbed for some time. There is also little evidence of disease present in the trees. The understory is composed of regenerating seedlings and groups of Cherry Laurel (*Prunus laurocerasus*) with Ivy (*Hedera helix*) and Wild Garlic (*Allium ursinum*)



Image 3 – Mature Beech tree beside boundary wall

The removal of the tree line adjoining the field would leave a significant gap in the roadside tree line which would greatly alter the environment and visual amenity of the roadside planting. The removal of trees at the western edge of the woodland would put the remaining adjoining trees at risk of wind damage.

MIDDLE SECTION

The middle section of the Estate frontage includes the listed entrance gates and listed gate lodge. While the widening proposals will retain the entrance gates and gate lodge the trees on either side of the gateway would be removed which would create a significant visual impact on the setting of the gates and gate lodge.

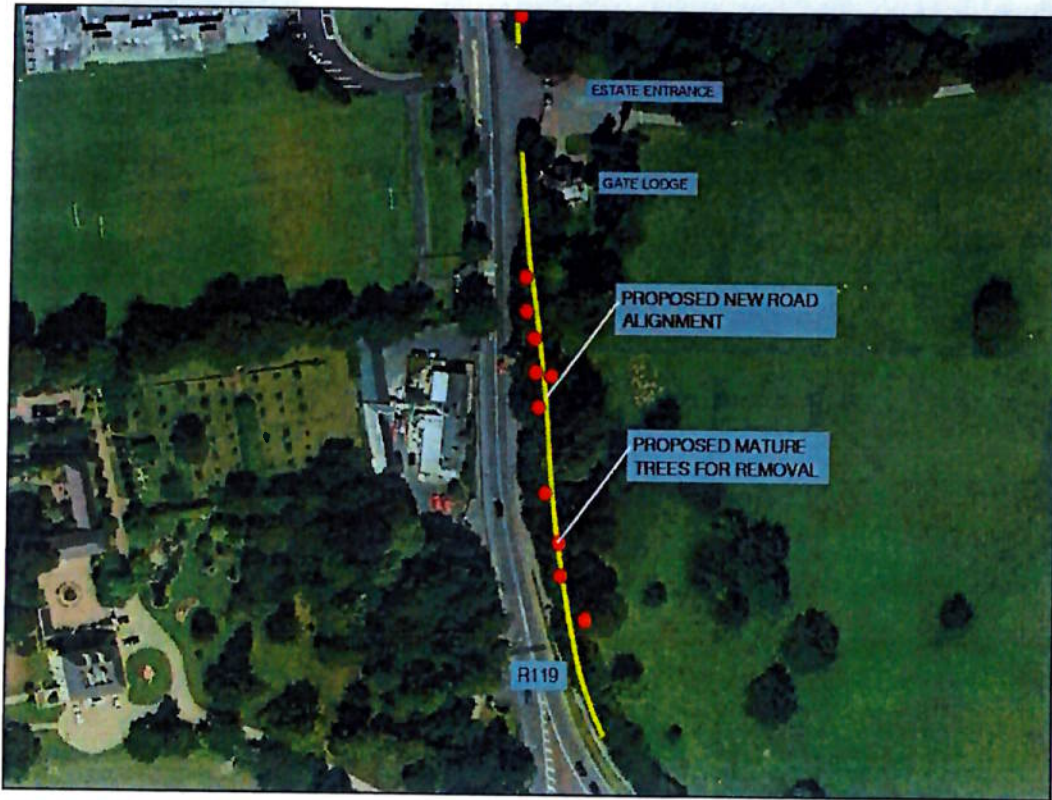


Fig. 3 – Entrance gates & gate lodge



Image 4 – Middle section with mature Cypress and Pine trees beside boundary wall



Image 5 – Middle section with mature Lime tree beside boundary wall



The middle section contains a range spread out mature specimen tree types up to 20M in height including Lime (*Tilia spp.*), Pine (*Pinus spp.*) and Cypress (*Cupresses spp.*).

Several of these mature specimens are set back from the boundary wall but the ground slopes to the north in this area which would require additional excavation to create usable slopes which would impact on trees away from the

boundary.

Image 6 – Middle section with trees close to wall

The proposed works in this area would remove the majority of the mature trees exposing the estate to adjoining properties and impacting on views from the house and grounds.

SOUTHERN SECTION

The southern section of the estate frontage includes the existing M11 access roundabout and a section of woodland on the southern boundary of the estate. The original road widening works to create the roundabout resulted in an expansion into the estate lands with the resultant mature tree felling.

Remediation of the landscape included the creation of a 2 – 3M high berm on the estate side of the new boundary wall and the provision of screen planting on the berm and the planting of a woodland area in the corner of the site. This planting now provides good screening for the house and estate



Image 7 – Berm with planting close to roundabout boundary

grounds from traffic entering and existing the M11. The BusConnects proposals will result in the removal of a significant number of mature woodland trees from the corner of the site. The creation of manageable slopes would also result in more trees being removed.

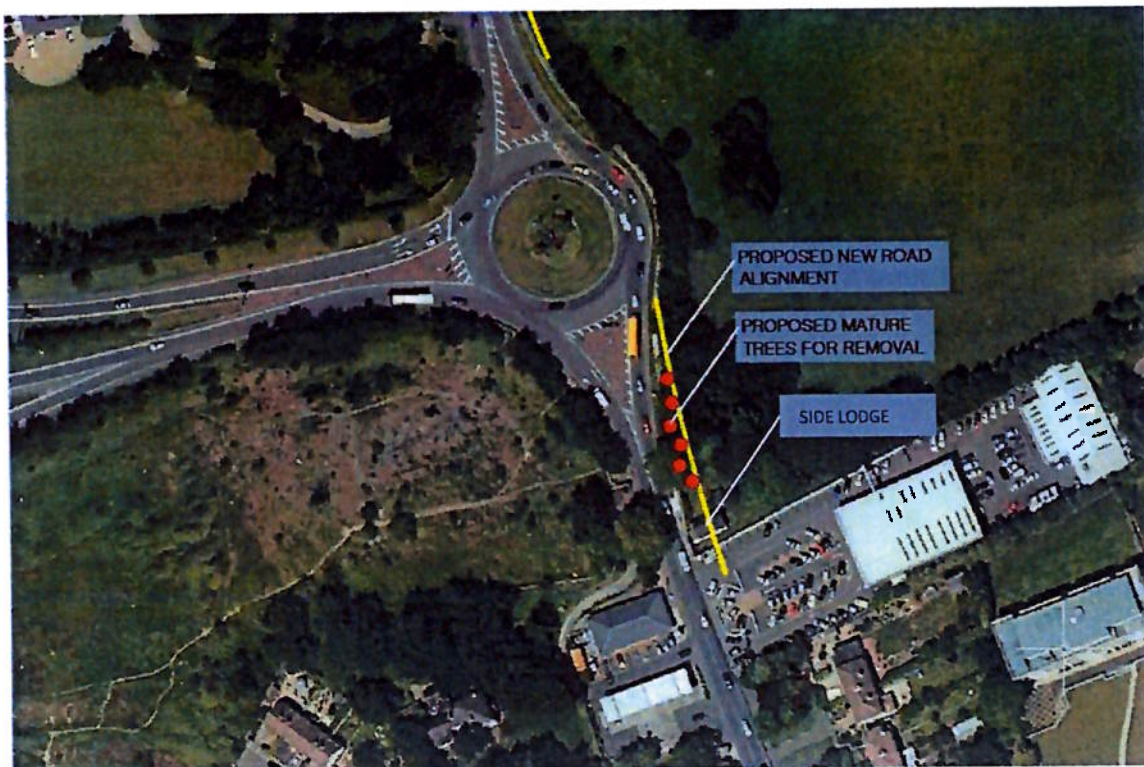


Fig. 4 – Roundabout & southern section



Image 8 – Southern section woodland area

CONCLUSIONS

The Woodbrook Estate is a historically important estate in a sylvan setting between Bray and Shankill. The R119 Dublin Road passing the western boundary of the estate is a relatively undeveloped roadway with historic boundary walls, gate lodges and mature trees lining both sides of the roadway. The road widening proposals as currently envisaged for the BusConnects project would result in the removal of notable historic stone walls and a significant number of mature trees. This would have a significantly negative visual impact of the Woodbrook Estate and its setting within the wider landscape of the area.

**APPENDIX 2
TRAFFIC & ROAD DESIGN ASSESSMENT**

Prepared by NRB Traffic Consultants

5 Oct 2023
19-063/ER

An Bórd Pleanála,
c/o John Spain Associates,
39 Fitzwilliam Place,
Dublin 2,
D02 ND61

Sent By Email Only

Dear Sir/Madam,

BUS CONNECTS - BRAY TO CITY CENTRE - CORE BUS CORRIDOR
PLANNING APPLICATION BY THE NATIONAL TRANSPORT AUTHORITY (NTA)
COMPULSORY PURCHASE ORDER
REVIEW/SUBMISSION ON BEHALF OF WOODBROOK ESTATE

NRB Consulting Engineers Ltd are specialist in the field of Traffic/Transportation and Roads, and we do not offer expertise in other areas of Consulting Engineering. Further details of our expertise are available on our website at www.nrb.ie.

This submission has been prepared on behalf of our Client, Sir Marc Cochrane of Woodbrook House, Woodbrook, Shankill, Co. Dublin. Woodbrook House estate is located within a green belt between Shankill and Bray with an extensive frontage onto the Old Dublin Road. The site location is shown at **Figure 1** below.



Source: Google Maps (Woodbrook Estate Approx Outline in red)

Figure 1 - Site Location

NRB previously prepared a submission on the initial NTA Emerging Preferred Route Corridor Plans in relation to Woodbrook Estate (by letter dated 20th May 2019), and we note that the now-proposed planning application route and design has a larger foot-print and appears to result in additional land-take and consequential loss of additional client lands and trees than was proposed at the earlier Consultation Stage.

We use annotated extracts from the NTA General Arrangement Drawings (Sheet #48 and #49) below to identify the clients lands affected by the Bus Connects Plans, below as **Figure 2** and **Figure 3**.

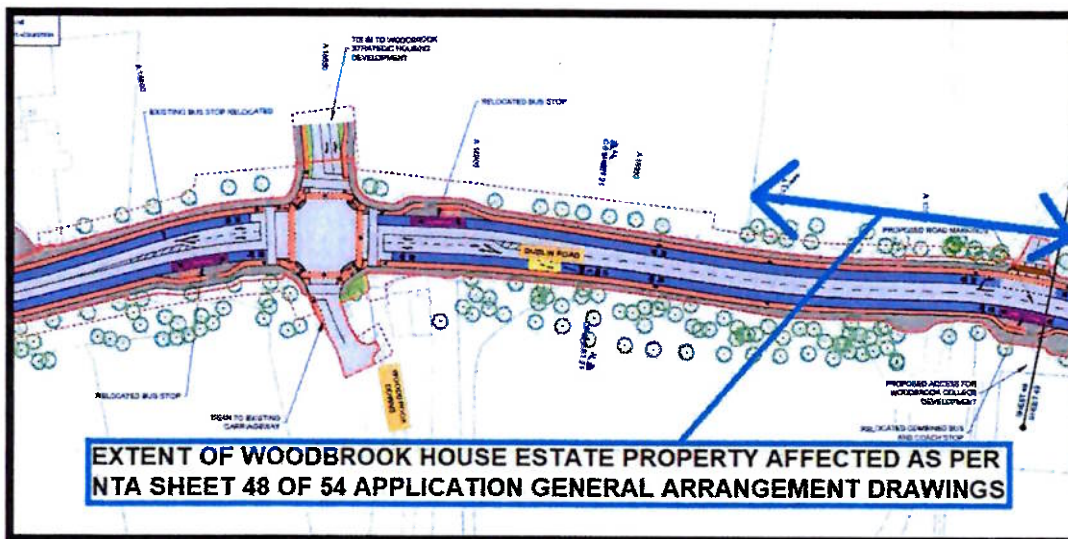


Figure 2 – Annotated Extract NTA GA Drawing #48 of 54

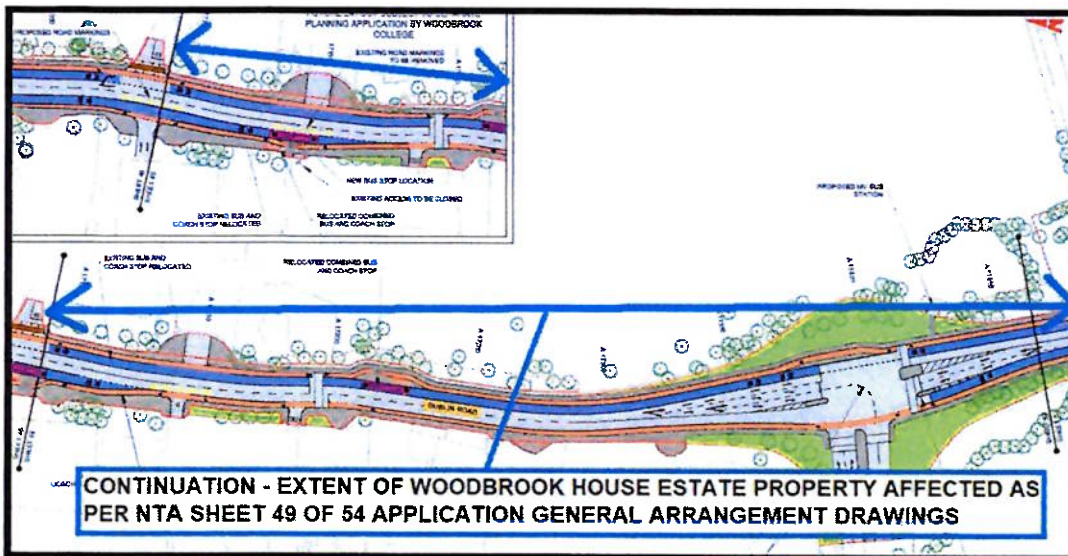


Figure 3 – Annotated Extract NTA GA Drawing #49 of 54



As part of our previous work, we reviewed the original Emerging Preferred Route proposal and considered viable alternatives for this section of the proposed bus corridor which would not entail such extensive land-take of the property, and importantly which would permit the majority of the existing mature trees to be retained.

We noted previously that at other random sections of the Core Bus Corridor Route e.g., in the adjacent Shankill Village, the cyclist facilities were taken off-line on a possible alternative route by way of a shared street facility. There are also sections of the route where the bus lane is omitted in one direction or in its entirety and other sections where the cyclists share the bus lane, all of which alternatives appear to be quite random in nature.

We note that this remains the case in terms of the Application Drawings, and we refer to Sheets #41 and #42 of the General Arrangement Application Drawings as examples of where this applies (Copies of these drawings are attached to this submission for ease of reference).

It is in this context that alternative layouts along the Woodbrook Estate site frontage are also proposed as appropriate by us in order to minimise the impact of the works to our clients lands and to minimise the impact upon important trees.

ALTERNATIVE LAYOUT

As previously proposed, we believe that the appropriate and far less damaging / contentious option for the Bray / City Centre section of Core Corridor 13 here would be to utilise a shared cycle & bus lane on both sides at this area, **similar to other sections of the Planned route e.g., in Donnybrook**. Unlike the offline cycle lane option proposed at Shankill, which is less direct and longer and therefore less attractive to cyclists, this provides a direct route to cyclists while reducing the impact on Woodbrook Estate.

This could be introduced with the detail fully in accordance with National Guidance as set out in The Cycle Design Manual and remaining consistent with other sections of the route.

This could be combined with a reduction in Speed Limit to 30km/h along the Dublin Road here which we also believe to be appropriate. This could be achieved with significantly reduced impact upon the property and reduced Core Corridor land acquisition/compensation and construction costs associated with this alternative arrangement.

This alternative layout option is shown on **NRB-SK-23-01** attached. A localised ~2m deep land take along a ~16m section of third-party property opposite Woodbrook Estate would reduce the land take on a ~150m long section of the Woodbrook estate north of the existing pedestrian crossing while making use of the existing public road lands.

This shared cycle & bus lane option should also be used at the "Side Lodge" protected structure to reduce the impact of the Bus Connects proposals.

Additional Concerns - Potential Disruptions

The proposed construction works, due to their immediate proximity to our client's lands and buildings will result in significant diversions, closures, restricted access, and construction related traffic in the area for a prolonged period of time. The likely traffic and construction noise, dust and emissions that will result from these should not be underestimated.

Furthermore, our client is concerned that the implementation of the Proposed Bus corridor Scheme could have significant impact on infrastructure and utilities during the construction phase. In the past businesses have experienced severe disruption during the construction of public contracts of this nature, such as power outages, broadband outages, water supply issues, drainage issues etc – all of which are extremely disruptive to businesses. Our client would require some certainty that similar instances would not occur as a result of these works.



We trust that An Bórd Pleanála will take these construction related concerns into account in assessing the application and in adjudicating on the CPO.

Additional Concerns – Delays and Uncertainty

We highlight that any decision that is made by An Bórd Pleanála to approve the proposed scheme has a myriad of consequences for any affected landowner that go beyond the rules governing the assessment of compensation. Primarily these consequences arise from the uncertainty surrounding the commencement date and date of completion, if the proposed Bus Corridor Scheme is approved, along with the associated CPOs.

We suggest that An Bórd Pleanála should satisfy itself that the acquiring Authority is minded and committed to proceed in a timely fashion if the proposed Bus Corridor Scheme is confirmed. We suggest that An Bórd Pleanála should impose binding conditions on the acquiring Authority in respect of the Programme, to give certainty to our client in the event of the Scheme and the CPO's approval.

CONCLUSION

We believe that the appropriate, and by-far the least contentious option for this section of the Bray / City Centre section of this Core Corridor would be to accommodate shared cycle & bus lanes on Dublin Road, as outlined above.

We have highlighted and enclosed an alternative layout as shown on **NRB-SK-23-01** which significantly reduces the impact on the property and which we believe will provide a safe, acceptable route for all users.

We would therefore invite An Bórd Pleanála and the NTA to revisit and revise current plans for the route in order to avoid the adverse consequences for our client, together with the economic and environmental / tree impact and consequences as highlighted and set out herein.

We trust that the above is in order and we look forward to receiving the response.

Yours sincerely,

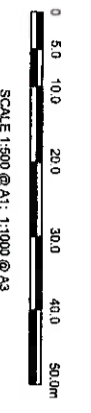


Eoin Reynolds
Chartered Engineer
Director

Enclosures:

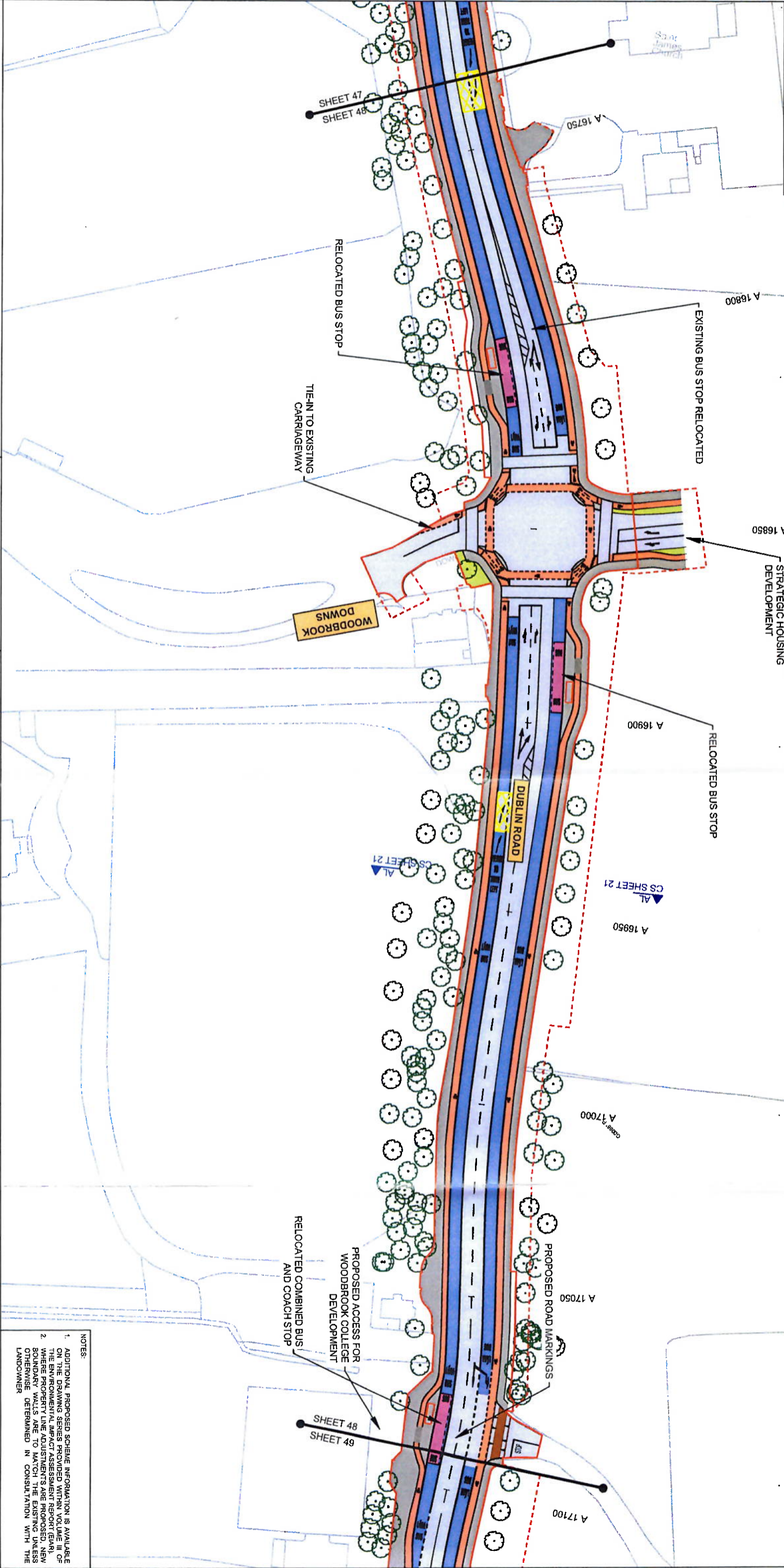
- **NRB Drawing NRB-SK-23-01**
- **Jacobs / NTA General Arrangement Extracts (Sheet #41, #42, #48 and #49)**





LEGEND:

- BUS LANE
- CYCLE TRACK
- FOOTPATH
- CARRIAGEWAY
- GRASS AREA / VERGE
- PEDESTRIAN PRIORITY ZONE
- RAISED TABLE
- BUS STOP LOCATIONS
- BUS SHELTER
- TREE (EXISTING AND PROPOSED)
- HERITAGE FEATURES
- SITE BOUNDARY LINE
- TEMPORARY LAND ACQUISITION



Notes:

- ADDITIONAL PROPOSED SCHEME INFORMATION IS AVAILABLE ON THE DRAWING SERIES PROVIDED WITHIN VOLUME III OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIA).
- WHERE PROPERTY LINE ADJUSTMENTS ARE PROPOSED, NEW BOUNDARY WALLS ARE TO MATCH THE EXISTING UNLESS OTHERWISE DETERMINED IN CONSULTATION WITH THE LANDOWNER.

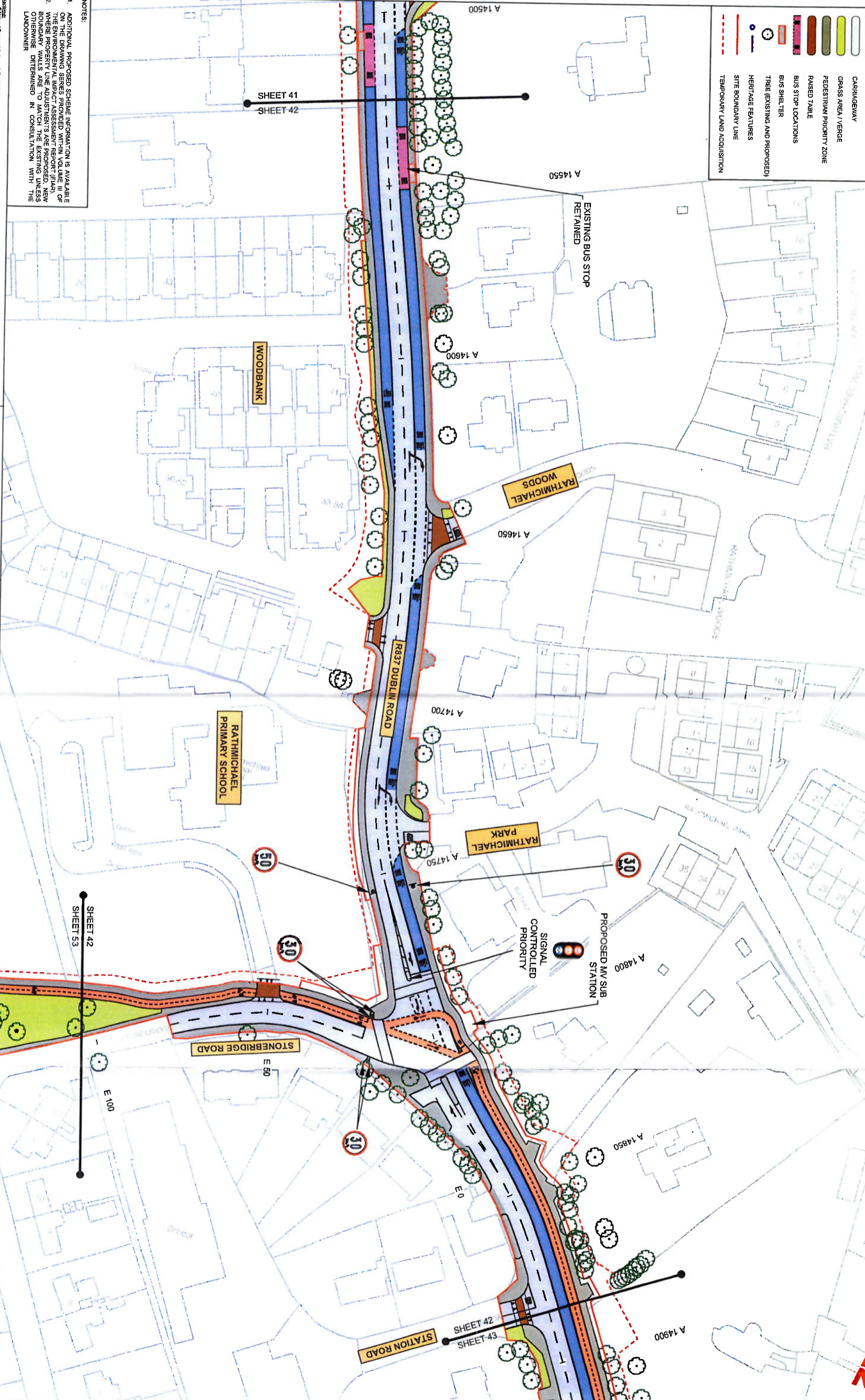
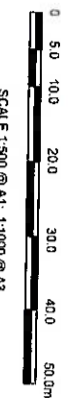
Project Ireland 2040
Building Ireland's Future

Rev	Date	By	CHKD	Apprd	Description
M01	08/05/2023	RB	EC	RS	ISSUE FOR PHASE 4 PLANNING

Client	NTA National Transport Authority
Engineering Designer	Jacobs

Programme Title	BUSCONNECTS DUBLIN
Drawing Title	CORE BUS CORRIDORS INFRASTRUCTURE WORKS
Drawing File Name	BRAY TO CITY CENTRE CORE BUS CORRIDOR SCHEME
General Arrangement Plan	GENERAL ARRANGEMENT PLAN
Sheet Number	48 of 54
Status	A
Rev	M01

- LEGEND:**
- BUS LANE
 - CYCLE TRACK
 - FOOTPATH
 - CARRIAGEWAY
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- NOTES:**
1. ADDITIONAL PROPOSED SCHEME INFORMATION IS AVAILABLE ON THE DRAWING SHEETS PROVIDED WITHIN VOLUME III OF THE ENVIRONMENT AND SOCIETY ASSESSMENT REPORT (EASR). WHERE PROPERTY LINE ADJUSTMENTS, NEW BOUNDARY WALLS ARE TO MATCH THE EXISTING WALLS OTHERWISE DETERMINED IN CONSULTATION WITH THE LANDOWNER
 2. THE DRAWING IS TO BE USED FOR CONSTRUCTION OF THE PROPOSED SCHEME.
 3. THE DRAWING IS TO BE USED FOR CONSTRUCTION OF THE PROPOSED SCHEME.
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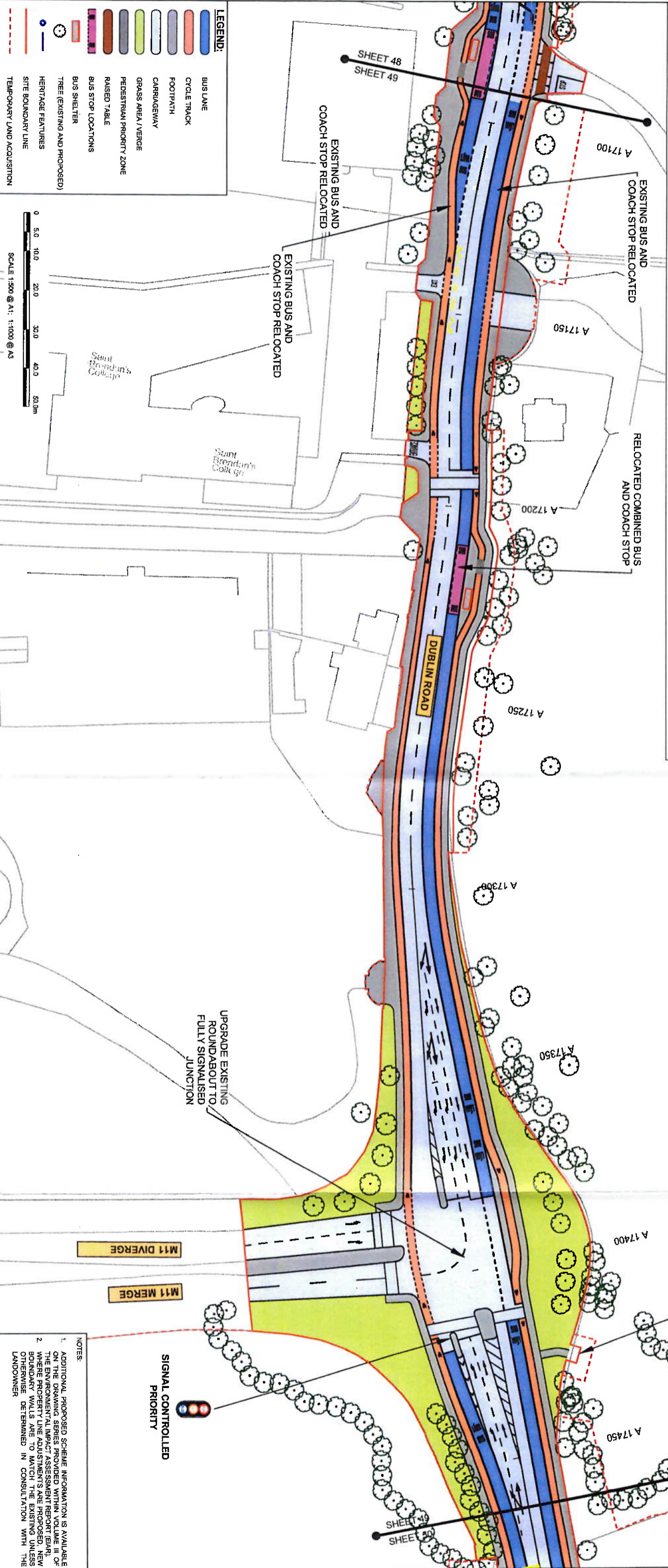
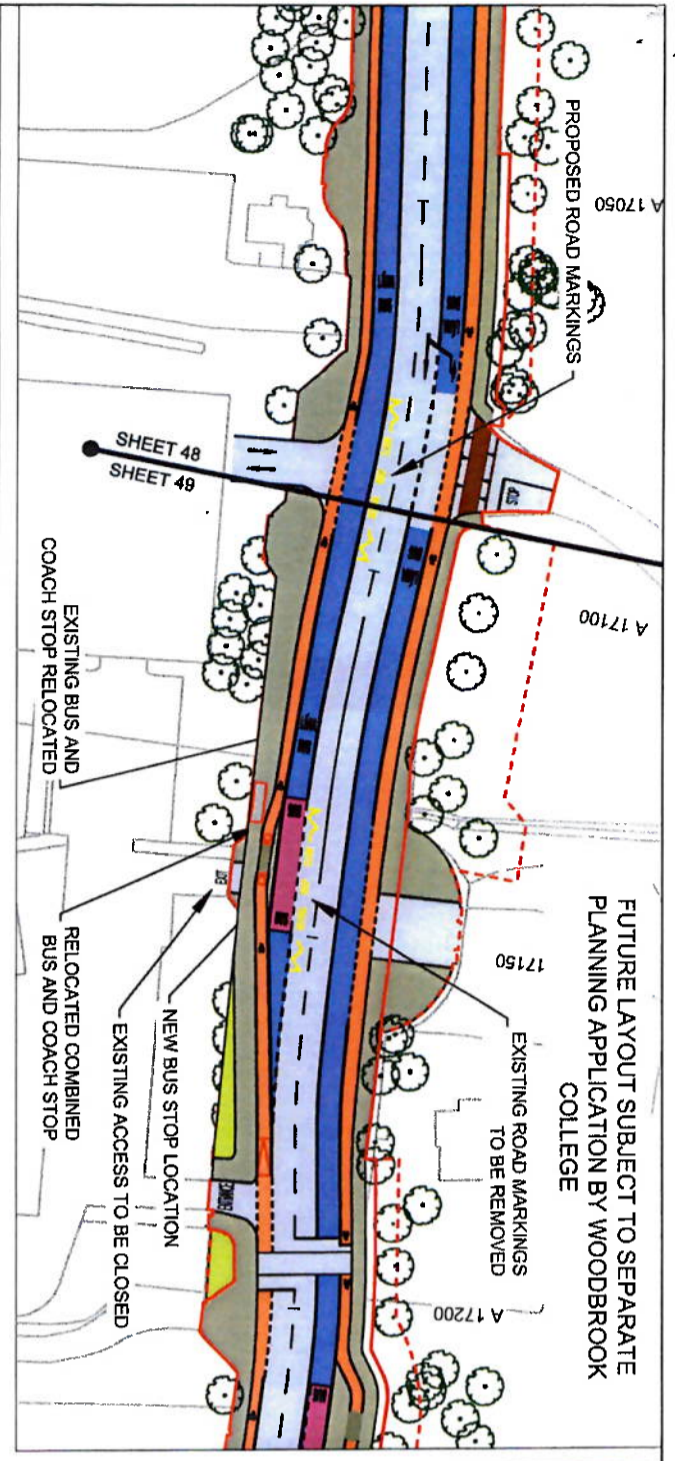
Project Ireland 2040
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Rev	Date	By	Checked	App'd	Description
M01	08/05/2023	RB	EC	RS	ISSUE FOR PHASE 4: PLANNING

NTA National Transport Authority	Jacobs Engineering Designer
Date: 08/05/2023 Scale: 1:500 @ A1 Drawing: RB	Checked: EC Approved: RS

Project Code: BCIDB	Originator Code: JAC	GIS Code:
Drawing File Name: BCIDB-JAC-GEO_GA-0013_XX_00-DR-CR-0042	Sheet Number: 42 of 54	Status: A
Programme Title: BUSCONNECTS DUBLIN	Project Title: CORE BUS CORRIDORS INFRASTRUCTURE WORKS	Project Description: BRAY TO CITY CENTRE CORE BUS CORRIDOR SCHEME GENERAL ARRANGEMENT PLAN
Rev: M01	Rev: A	Rev: M01





LEGEND:

- BUS LANE
- CYCLE TRACK
- FOOTPATH
- CARRIAGEWAY
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- BUS SHELTER
- TREE (EXISTING AND PROPOSED)
- HERITAGE FEATURES
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Scale: 0 5.0 10.0 20.0 30.0 40.0 50.0m
SCALE 1:500 @ A1; 1:1000 @ A3

Project Ireland 2040
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Rev	Date	By	Check'd	App'd	Description
M01	08/05/2023	RB	EC	RS	ISSUE FOR PHASE 4: PLANNING

NTA
National Transport Authority

Jacobs
Engineering Designer

Scale: 1:500 @ A1, 1:1000 @ A3

Drawn: RB, Checked: EC, Approved: RS

Programme Title
CORE BUS CORRIDORS INFRASTRUCTURE WORKS

Drawing Title
BRAY TO CITY CENTRE CORE BUS CORRIDOR SCHEME GENERAL ARRANGEMENT PLAN

Drawing File Name: BCIDB-JAC-GEO_GA-0013_XX_00-DR-CR-0049

Sheet Number: 49 of 54

Status: A

Rev: M01

NOTES:

- ADDITIONAL PROPOSED SCHEME INFORMATION IS AVAILABLE ON THE DRAWING SERIES PROVIDED WITHIN VOLUME III OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIA).
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