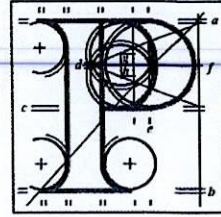


Our Case Number: ABP-313509-22



**An
Bord
Pleanála**

Liam Kavanagh
25 Nutley Park
Donnybrook
Dublin 4
DO4 E4F1

Date: 18 July 2022

Re: BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme
Co. Dublin

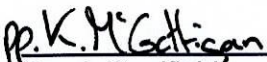
Dear Sir,

An Bord Pleanála has received your submission in relation to the case mentioned above and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at www.pleanala.ie and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,


Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

BL50A

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**25 Nutley Park,
Donnybrook,
Dublin
DO4 E4F1.**

12 July 2022

An BordPleanála,
Strategic Infrastructure Division,
64 Marlborough Street,
Dublin 1.

**RE: Belfield / Blackrock to City Centre Core Bus Corridor Scheme
Case Number : 313509**

Dear Sirs,

I am a resident of Nutley Park, Donnybrook. The Nutley area is a close community group which is actively involved in many community activities such as street parties, annual street clean ups, social golf outings and dinners. The Nutley area comprises Nutley Road, Nutley Lane, Nutley Park, Elm Park, Seaview Terrace, Nutley Avenue and that part of Stillorgan Road between the junctions at Nutley Lane and Nutley Park. I recognise and welcome, in principle, the need for bus corridors and cycle lanes. However, as a resident of the Nutley area I am gravely concerned with the proposed planning application for the Belfield/Blackrock to City Centre Core Bus Corridor. In particular, I have concerns about the section on Nutley Lane. It has not been demonstrated that the proposal for the link between the Stillorgan Road and the Merrion Road is necessary. If it is deemed necessary I am not satisfied that the impact on the local community outweighs the benefits.

The Nutley area is directly and adversely affected by the proposed development. It is proposed to develop Nutley Lane into a four lane highway. This will essentially divide the Nutley community in two with Elm Park Golf Club, Nutley Park and the Stillorgan Road on one side and the rest of the Nutley community on the other side. This surely is contrary to the Dublin City Development Plan which seeks to promote and encourage the creation of local communities. The proposal will adversely alter the character of, and have a negative impact on, the residential amenity of the neighbourhood for ever. The description of the proposal as a simple "*road development*" is misleading and disingenuous and seeks to obscure or hide the true scale and nature of the proposed development. It completely underscores the substantial adverse impact this scheme will have on the Nutley area if permitted to proceed. It adopts a simplistic approach to a much more complicated problem.

The initial proposals from the applicant for Nutley Lane attracted 100 + submissions which is a remarkable response, indicative of the concern throughout the Nutley area. There were 700 + submissions altogether for the proposed scheme. The applicant has noted that in regard to initial submissions "*..95.5% were from residents of the study area who were not directly impacted by the scheme and typically referred to local matters....*". It is not clear at all what the applicant means by "*not directly impacted*". Their choice of words (again) would

seek to create an impression that there is no need to be concerned about the proposal, and the rather dismissive reference to "*local matters*" seeks to create an impression that such matters might not be relevant or that they are trivial. Nothing could be further from the truth. All those living in the Nutley area will be directly and permanently impacted by this scheme, and it is absolutely the privilege of people across the board (Nutley included) to be concerned about "*local matters*".

In reference to the Bus Connects project Eamon Ryan, Minister for the Environment, Climate and Communications, recently said: "*.. We will have cleaner and quieter streets and..... we can look forward to a much better quality of life for Dubliners...*". Perhaps he wasn't thinking of the Nutley area when making those remarks.

There are a number of immediate concerns and points to be made (not in any particular order of importance):

1. The scheme if implemented as proposed will irrevocably destroy the residential nature of Nutley Lane.
2. The loss of the 56 on-street parking bays on Nutley Lane will push parking into adjacent residential roads (never built for current volumes, let alone future volumes), causing greater traffic congestion and severely impacting on vehicular access to houses. This is clearly a foreseen adverse consequence of what is being proposed, yet no solution or recommendations appear. This begs the question as to why an overall comprehensive traffic management plan for the greater Nutley area (to incorporate Ailesbury Road (and roads off it) has not been developed. The expected development of the National Maternity Hospital and the Cairn site (formerly part of the RTE campus) and the additional traffic to be generated have not been taken into account. Can the proposal proceed to adjudication in the absence of such a plan?

As things stand, the traffic on Nutley Lane is often at a standstill. There is daily congestion at all junctions on Nutley Lane, but especially at the entrance to St Vincent's Hospital. This entrance is the main entrance for ambulances and for most persons coming to the hospital for any reason. The congestion is most evident in the morning from 7.00am as staff from the Hospital queue for access from Nutley Lane into the hospital car park facility – recently extended and expanded. The East – West access road within the Hospital is regularly clogged to a standstill with cars going in and out. The proposed scheme does nothing to relieve any of that. In fact the traffic will further deteriorate as the hospital expands. What is wrong with asking the staff to use public transport and take the short walk from any of the well served routes from the Merrion Road/ Stillorgan dual carriageway or the Dart?

3. It is unclear from the Appropriate Assessment Report whether the environmental impact on the Nutley Lane section has been adequately assessed. The Booterstown Marsh is close to Elm Park Golf Club. The golf course has considerable road frontage

onto Nutley Lane. The Appropriate Assessment Report relies heavily on the Mc Corry and Ryle 2009 report for data relating to the Booterstown Marsh. This report is now 13 years old and may well no longer be accurate. There have been sightings of Brent Geese on the Elm Park golf course in recent years. The report mentions kingfisher breeding sites on the Nutley river. This river runs through the golf course. The golf course comprises 22 acres of parkland and is adjacent to Nutley Lane. The environmental impact on the Golf course must be assessed.

4. If the scheme goes ahead it seems certain that the hedging and trees which border the golf club will be replaced by a wall and which will therefore take away from the amenity value of the area and which no doubt will be subject to graffiti.
5. In addition, there is a serious environmental impact on Nutley Lane itself. The loss forever of the environmental, visual and amenity value of substantial mature trees and foliage on Nutley Lane, the retention of which, in the urban landscape, must surely be a priority.
6. The creation of so many conflict points for residents exiting / entering houses, side roads and other premises.
7. The increased noise, nuisance, pollution, vibration created by the introduction of a major traffic route (much more than a mere "*road development*") through Nutley as well as the profound impact on the amenities of properties immediately adjoining the proposed four lane highway in terms of excavations, disposal of waste arising from construction, potential alteration of the underlying hydrology (and any consequential effects on structural stability of nearby buildings) and construction traffic.
8. One of the policy objectives of the National Planning Framework: Ireland 2040, the which AnBordPleanála must have regard, is the "*...expand attractive public transport alternatives to car transport...*" There is no evidence to show that the scheme as proposed for Nutley Lane will take a single car off the road. Will those who travel to the Hospital (new Maternity Hospital), Merrion Shopping Centre and Elm Park Golf Club will suddenly all start travelling by bus. So, Nutley Lane will be as busy as ever with car traffic plus the substantially increased bus traffic. Ambulances will find it even more difficult to travel on Nutley Lane. More buses may well attract some people out of cars, but this will not affect commercial traffic, those for whom a car is essential for a whole host of reasons, the majority of persons who already attend St. Vincent's Hospital, the 100,000 + outpatients who will be attending the future National Maternity Hospital and those who must use a car to come into Dublin from outlying areas and neighbouring counties where there is simple no transport alternative.
9. A very high bar should be set to critically review and dissect the environmental impact and a high level of protection of the environment should be sought.

10. The current proposal, if implemented, is likely to have an adverse, and potentially catastrophic, impact on property values on those houses on Nutley Lane, and the area in general, and will be a serious interference with the owners' property rights. Again, this is clearly a foreseen adverse consequence of what is being proposed.
11. There has been a significant and very late change in the proposal relating to the switching of part of the proposed cycle track at the Stillorgan Road end of Nutley Lane from one side of the Lane (the RTE side) to the opposite side. This switch was not the subject of any public consultation and calls into question the whole scheme. The switch makes no sense. It is now proposed to have a cycle track running immediately outside the vehicular entrance to a number of houses, whereas the original proposal put forward was to have the cycle track on the opposite (RTE) side where there are no houses. Can the proposal proceed in the absence of prior public consultation regarding this vital element of the scheme?
12. Nutley Lane connects the Stillorgan Road and Merrion Road, both of which are well served by existing high capacity and well established bus corridors. The Merrion Road end of Nutley Lane is also adjacent to Sydney Parade Dart Station. (And AnBordPleanala should take note of the proposal to double the capacity of the Dart service). The Stillorgan Road route runs straight past UCD (the suggested starting and finishing point for buses which might use the Nutley Lane route). So what is wrong with that route? Where is the need to connect the two roads? The short distance between the two hardly justifies all the adverse consequences (not to mention cost) of joining the two by means of a four lane highway. UCD once sought to establish a shuttle bus from Sydney Parade Dart Station to UCD. Demand was so low that it was subsequently abandoned. AnBordPleanala must carry out a thorough analysis of all underlying data (including the criteria used in the Multi Criteria Analysis which appear to be based on the 2011 Census Small Area Population Statistics?) which seeks to justify the proposal.
13. Nutley Lane is simply not a suitable road for this project. It is too narrow. To widen it, will irrevocably damage Nutley Lane and the community. The need to use link the access roads at the Stillorgan dual carriageway and Merrion road are unproven. A significantly increased number of busses will turn right from the Stillorgan Road onto Nutley Lane. This will slow down traffic on the Stillorgan Road. Adequate consideration has not been given to alternative routes which could eliminate this bottleneck.

The applicant's answer to all these concerns is simply that Nutley Lane is "*a suitable route*". It may well be, although we would not accept that as being true, but that does not make it the right route.

While it is accepted that the provision of a bus service is an essential element of overall public transport, the "Bus Connects" concept, and the Nutley Lane element in particular,

must be examined on the basis of need, cost and impact. What started several years ago and seemed like a good idea at the time may no longer be the appropriate solution. Covid has virtually changed everything in terms of transport needs. We note, for example, the table (in Appendix A) published recently showing footfall figures for Dublin City in May 2022 compared with 2019. Working from home (or various hybrid combinations) is rapidly becoming part of the normal working routine for thousands of people who might otherwise engage in a daily commute.

The recent Right to Request Remote Work Bill 2021 is part of the government's vision to make remote working a permanent feature of Ireland's workforce in a way that can benefit all – economically, socially and environmentally. This is clearly going to have an immediate impact on public transport. The term remote work refers to the broad concept of an arrangement where work is fully or partly carried out at an alternative worksite other than the default place of work. The commitment to introduce legislation to underpin employees' right to request remote work was made in the National Remote Work Strategy published in January 2021. An BordPleanála must have regard to this when considering the merits of the application.

Another policy to be considered by An BordPleanála must be the Greater Dublin Area Transport Strategy 2016 to 2035, the recommendations of which never included any proposal for Nutley Lane.

Yours Sincerely

Liam Kavanagh