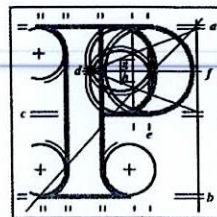


Our Case Number: ABP-313509-22



**An
Bord
Pleanála**

Sarah and Stephen Lillis
69 Nutley Lane
Donnybrook
Dublin 4

Date: 18 July 2022

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


Dear Sir / Madam,

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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Case: 313509

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

We would like to object to certain aspects of the Ballsbridge to UCD Bus Corridor, specifically relating to impacts on Nutley Lane. We appreciate the desire to update the bus network, however we have serious concerns and reservations about how the proposal is to be implemented

We attended every community forum meeting; had a number of private meetings with the NTA; and submitted views at every point possible. To this extend we feel we have been ignored on choice of route; design of the local area route put forward; and confused/disappointed by contradictions within the reports/ documentation within the planning permission submission:

- What the local residents were informed would be the final drawings were not submitted for planning permission (eg changes to cycle tracks and in particular the replacement of mature hedging with a concrete wall has negative environmental and visual impact);
- Table 9.52 summary of operational phase impacts (listing every possible option) does not show a fair view of the additional impacts as part of the potential routes has existing bus lanes, whereas Nutley Lane does not and has very few buses transiting on the road at present, thereby covering up the additional impact to Nutley lane from noise/ vibration etc
- The house used for noise volume testing was a poor sample to be used as it is on the higher end of the road and benefits massively from RTE's mature hedging to reduce noise impact. We were also informed that the test was carried out from the back garden of the property, whereas EIAR Vol 2 CBC14-15 ch9 n&v table 9.6 states that a front property was used. We offered our house to be used for noise /vibration testing as our property is on the lower elevation end of the road and would give a better test sample.
- the loss of left turn lane into SVUH discussed further below.

Our main objections are as follows:

Environment / Noise Impact

The NTA's 'preferred option' will cause an immediate and enormous increase in traffic flow for the street, which NTA have failed to capture in the environmental reports. Prior to Bus Connects there were 2 Dublin Bus routes on the road – the 27X (twice daily, weekdays only) and the 47 (19 times a day, roughly one every 40 minutes). Under the new proposal there will be:

- a bus every 3-6 minutes during peak hours.
- new bus lane facilities will encourage other vehicles such as airport bus, tourist bus providers and taxis to use the route.
- the removal of the left-turn lane into SVUH from Merrion Road to aid cyclist safety (source: BusConnects EIAR Vol 2 CBC1415 Ch 4 Proposed Scheme; section 4.3). This will push additional hospital traffic onto Nutley lane
- the removal of the left slip lane onto Stillorgan road (source: BusConnects EIAR Vol 2 CBC1415 Ch 4 Proposed Scheme; section 4.5.5.1), however the majority of traffic travelling up the road take this turn, and will now be backlogged waiting for bus & cyclist priority first.
- Loss of approx. 80 mature tree and evergreen hedging

The Environmental reports state that there will be "negligible" air quality impact and no material uplift in "noise and vibration", this is a generalised statement based on the:

- Route in its entirety, the majority of which has a bus lane already, but, in isolation, ignores the new bus lane and material increase in traffic through Nutley Lane which will have a significant local impact
- Current changes on working/ studying & shopping from home significantly reducing the need to travel.

- Prediction of a scenario 21 years from now, which might not come to pass.

Choice of Option:

Within the planning application it is noted that 3 options for the connection between Merrion Road and Stillorgan road/N11 were identified, with Option 1 (Nutley Lane being selected). This is despite (quotes/extracts from "BusConnects EIAR Vol 2 CBC1415 Ch3 Alternatives, section 3.3.2.2):

- "With regard to Flora and Fauna, it was considered that Route Options 1 and 2 scheme options had some disadvantages over Route Option 3 scheme options given the lack of on-street trees which would be affected in Route Options 3 scheme options – as there are no trees within the road boundary along Booterstown Avenue"
- "Route 1 scheme options would require the removal the trees along the length of Nutley Lane which and consequently impact on the landscape and visual"
- "Route 3 scheme options did not propose additional traffic lanes (existing lanes would be used for buses/traffic) and would not require any land-take."
- "Route Option 1 would require considerable change to land use including road widening, removal of parking and trees, while Route Option 3 would also require the removal of parking on Booterstown Avenue"

We would welcome ABP's review of this section process to determine whether the proposed advantages are significant enough to select Option 1.

A compromise solution of routing cycle lane down Nutley Lane and buses through Booterstown Avenue would appear to make more environmental; structural; economic sense (i.e. no new traffic lanes required for Booterstown Avenue versus 2 new bus lanes and 2 new cycle lanes for Nutley Lane).

Overall Traffic Management Plan:

St Vincents University Hospital (SVUH) Access:

EIAR vol 2 CBC1415 Ch 4 proposed scheme page 4 '*At the access junction to SVUH from Merrion Road, the left-turn lane into SVUH ... been removed in order to improve cyclist safety and reduce the necessary land acquisition; but equally the general arrangements drawings page 14 has a left turn into hospital. Which proposal is correct??*

If access to SVUH from Merrion Road is removed /restricted it will further impact congestion on Merrion Road and lead to further increased flow up Nutley Lane as it would become the only entrance/exit.

With this in mind it is very hard to tell how the proposed junction scheme to access SVUH from Nutley Lane will work – eg cars turning left into SVUH will contend with high volume buses inside it and 2 cycles lanes, thereby potentially blocking traffic to the rear (coming from Merrion Rd).

Nutley Lane Junctions:

Given the huge increase in proposed bus traffic, with dedicated turning lanes for buses from both Stillorgan Road and Merrion Road it is highly questionable as to how this will work in reality. Both Merrion Road and Nutley Lane are high volume traffic roads with proposed high density bus routes. The routing of new high volume buses through Nutley Lane will lead to further traffic and bus congestion on these key routes.

As noted above the left slip road for cars turning left from Nutley Lane onto Stillorgan Road is to be removed. The majority of traffic travelling up Nutley lane take this turn left and will have to contend with two cycle lanes inside, therefore creating safety risk and / or further congestion. The original

proposal included the transfer of the cycle lane to the opposite side of the road at the entrance to Elm Park Golf Club,

Conclusion:

Please don't think we are close minded, only focusing on our section of the proposal. We see issues and have many concerns with various sections impacting other areas within the proposed route, however we felt for this submission it was best to focus on and convey the dramatic and life changing negative effects the Bus Connects projects will have for our local area.

We strongly urge you to not accept the proposal in its current form.

If you have any questions in relation to our letter please contact us.

Kind Regards,

Sarah and Stephen Lillis
69 Nutley Lane
Donnybrook
Dublin 4