

Bill & Margaret Nolan
71 Nutley Lane
Donnybrook
Dublin
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

Tell	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

An Bord Pleanála
Strategic Infrastructure Division
64 Marlborough St.
Dublin 1

AN BORD PLEANÁLA	
LDG-	055266-22
ABP-	313509-22
12 JUL 2022	
Fee: €	50
Type:	cash
Time:	16:32
By:	Lavel

Observation letter regarding:
Bus Connects Belfield/Blackrock to city centre
Bus Corridor Scheme
Case No. 313509

This submission relates essentially to the Nutley Lane section of the proposed Belfield to city centre route in Case No.313509.

This is because Nutley Lane will be impacted far more severely than any other section of this bus corridor as the Bus Connects proposal links two separate corridors, ie Belfield to city centre/Blackrock to city centre, using Nutley Lane as the linkway.

This submission lists three main objections to the Bus Connects plan for Nutley Lane:

- 1) the proposal to gift two new traffic lanes to private vehicles for their exclusive use;
- 2) the lack of an Environmental Impact Assessment study specifically for Nutley Lane where its proposal will double car traffic if allowed to proceed;
- 3) the proposal to build an ugly concrete wall replacing mature greenery and trees along the boundary with Elm Park Golf Club.

The argument for priority bus corridors is widely accepted as transport planning from now on must closely align with Government net zero targets. Hence using Nutley Lane as a bus corridor linkway is understandable, although this will involve considerable environmental damage.

It is astonishing, however, to find that the Bus Connects proposal for the linkway also prioritises private vehicles. If the plan as it stands is allowed to proceed, Nutley Lane's two traffic lanes will be transformed into a four lane highway - plus a bike way - as buses, cars, trucks and bikes are shoehorned along the linkway in both directions. Private vehicles are to be gifted their own exclusive lanes where none exist at present.

How can a public transport enhancement project justify prioritising private vehicles in this way? It is an unacceptable element of Bus Connects proposal and must be referred back for review and revision as appropriate

While an argument can be made for an exclusive car lane from the Stillorgan Rd. end to facilitate access to St. Vincent's University Hospital (SVUH), no such argument exists for another exclusive car lane in the opposite direction. A mixed bus/car lane ought to suffice as Belfield bound buses are almost at the terminus and there is simply no justification for gifting cars a second exclusive lane heading out of the city.

The prospect of having two new exclusive car lanes will certainly attract greatly increased numbers of southside motorists to Nutley Lane. This runs completely counter to Government policy on public transport. It would be a very strange consequence of a project designed to discourage private vehicle use as much as possible in the years immediately ahead.

According to CODEMA, the energy agency advising Dublin's four local authorities, transport accounts for 28% of emissions in Dublin while cars account for 65% of that. To meet our 2030 emissions targets, CODEMA says that fossil fuel vehicles must be reduced by at least 25% over the next 7/8 years.

Many European cities are taking their 2030 targets very seriously by increasing the number of car free streets as they hasten design work on net zero public transport systems for a post fossil fuel 21st. century

Therefore, we strongly urge An Bord Pleanala to request that the proposed two exclusive car lanes on Nutley Lane be reviewed. The review should instead propose one exclusive car lane only, ie a lane from the Stillorgan Rd. primarily intended to provide access to SVUH, not a lane to make it easier for motorists to get into the city.

A further highly objectionable aspect of the four traffic lanes proposal for Nutley Lane is how damaging this would be for the local environment. Four lanes instead of the existing two lanes means a doubling of car traffic if it is allowed to go ahead. A doubling of car traffic in a confined residential area is a serious matter. But there has been no Environmental Impact Assessment Study (EIAS) focused on Nutley Lane specifically. This is not acceptable. No other section of the Belfield bus corridor can expect to see car traffic grow 100%

We urge An Bord Pleanala to refer this matter back to Bus Connects for review and appropriate action. The required action is clearly: an independent study focusing specifically on Nutley Lane of the environmental impacts of its proposal to double car

traffic in a confined residential area. This to include air quality issues, noise pollution, public safety data, etc.

As indicated above, we believe that three traffic lanes instead of the four proposed by Bus Connects will contribute towards reducing damage to the environment and the landscape. Even so, it is clear the damage will be extensive. A vast number of young and fully grown trees will probably disappear. Much in the way of hedge screening and other visual improvements have been put in place in recent years, for e.g. enhancing external views of SVUH.

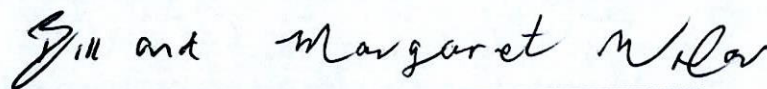
The Bus Connects plan for Nutley Lane will undo a great deal of this work unfortunately. During the consultation process, Bus Connects personnel indicated that every effort would be made to restore lost trees and hedges as much as possible within a reasonable time frame. However Bus Connects now appears to have changed its mind.....without an explanation.

An ugly concrete wall is now proposed along what will be the boundary between the newly laid out Nutley Lane and Elm Park Golf Course. This is a piece of vandalism which, sadly, is all too common across much of Dublin's new builds.

Surely An Bord Pleanala has a responsibility also to request that major public projects should act as much as possible to enhance the visual as well as environmental aspects of works that will last for decades. This is how other major cities in Europe plan their futures.

A major transport project such as Bus Connects intended to facilitate and enhance public movements across the city has a responsibility to also create as much visual and environmental beauty as possible in a capital city that can compete on quality of life data with any other city in Europe or elsewhere. Dublin deserves nothing less.

We urge An Bord Pleanala to note carefully the points we make in this submission - as well as the submissions being made by other members of the Nutley Residents Association with which we fully agree - and to refer these points back to Bus Connects for review and revisions as directed by An Bord.



Bill & Margaret Nolan

Residents of No. 71 Nutley Lane, Donnybrook, Dublin 4