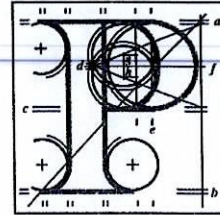


Our Case Number: ABP-313509-22



**An
Bord
Pleanála**

Nutley Residents' Association
13 Nutley Park
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
Glao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

NUTLEY RESIDENTS' ASSOCIATION

13 Nutley Park,
Donnybrook,
Dublin 4.

AN BORD PLEANÁLA
055238-22
313509-22
12 JUL 2022
Fee: € 50 Type: CUG
Time: By: C. O'Brien

11th July 2022.

An Bord Pleanála,
(Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1.

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

Dear Sirs,

Nutley Residents' Association ("the Association") represents the interests of the residents of the Nutley area. Membership of the Association is open to all residents in the Nutley area. The Association is run on a totally voluntary basis. The Committee is made up of representatives from 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.

The Nutley area is directly and adversely affected by the proposed "road development" (as the applicant describes the scheme). We strongly object to Nutley Lane being developed into a four lane highway as part of the proposal. The very choice of words in the newspaper advertisement of the proposed scheme as a "road development" says a lot. This is a road engineering presentation, concentrating on bus service only, with little or no urban planning element. The creation of this traffic highway essentially divides the Nutley community in two with Elm Park Golf Club and Nutley Park 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 that only such a small percentage (4.5%) of people will be directly impacted. 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 appears. 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 in the short term 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 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.

3. The loss forever of the environmental, visual and amenity value of substantial mature trees and foliage, the retention of which, in the urban landscape, must surely be a priority.
4. The creation of some many conflict points for residents exiting / entering houses, side roads and other premises.
5. 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.

6. One of the policy objectives of the National Planning Framework : Ireland 2040, the which An Bord Pleanála must have regard, is the “..expand attractive public transport alternatives to car transport..” There is no evidence to show that the scheme as proposed will take a single car off the road. So Nutley Lane will be as busy as ever with car traffic plus the substantially increased bus traffic. 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 simply no transport alternative.
7. 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.
8. 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.
9. 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 8 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 ?

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 and cost. 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 Bord Pleanála must have regard to this when considering the merits of the application.

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

The Climate Action Plan 2021 suggests that there is now an opportunity to “*..improve our health, boost the quality of our lives.....*”. How is that objective achieved by destroying Nutley Lane as it currently exists and turning it into a four-lane highway ? It certainly will not improve the health or the quality of life for those in the Nutley area.

Where is the money coming from to build this ? Bus Connects is due to cost € 2 billion. The applicant has already spent upwards of € 55 million on the Bus Connects programme. Commenting recently on the proposed Metrolink to Dublin Airport, an Irish Times editorial suggested “*a realistic view will need to be taken here, given the seemingly inevitable cost overruns these major projects seem to always incur*”. It could just as easily have been referring to the Bus Connects scheme (already years behind schedule). An Bord Pleanála must have regard to whether this is the best way to spend scarce State resources. Removing the Nutley Lane element will give rise to a substantial saving. The perceived benefits of the proposed four lane highway on Nutley Lane can hardly justify the enormous cost of providing this section of proposal.

Nutley Lane connects the Stillorgan Road and Merrion Road, both of which are well served by existing high capacity, high quality and well established bus corridors. The Merrion Road end of Nutley Lane is also adjacent to Sydney Parade Dart Station (and An Bord Pleanála 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 proposed Nutley Lane route). So what is wrong with the Stillorgan Road route ? While there may well be a need to improve certain portions of those bus corridors, but where is the need to connect the two roads by means of a four lane highway ? In other places (Merrion Road, for example) a three lane option with signal-controlled bus priority is being proposed. 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. An Bord Pleanála 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.

In the event of an oral hearing in respect of this application Nutley Residents' Association would intend to be represented and to participate.

Enclosed please cheque in the sum of € 50. Please acknowledge receipt of this letter and payment.

Yours faithfully,

John P. O'Malley,
Chairman.

Appendix A

