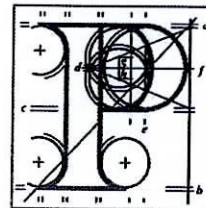


**Our Case Number:** ABP-313509-22



**An  
Bord  
Pleanála**

Brendan Heneghan  
88 Parkmore Drive  
Terenure  
Dublin

**Date:** 05 July 2023

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

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board. 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

AA02

**Teil**  
**Glaó Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
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Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902

88 Parkmore Drive

Terenure

D6W X657

An Bórd Pleanála

30 June 2023

Your reference ABP-313609-22 Belfield Blackrock

**AN BORD PLEANÁLA**  
LDG- \_\_\_\_\_  
ABP- 313509-22  
**30 JUN 2023**  
Fee: € \_\_\_\_\_ Type: \_\_\_\_\_  
Time: 15:18 By: Hand

This is a response to your letter of 2 June 2023 setting a deadline of 6 July 2023 for a submission on a document dated 8 September 2022.

Preliminary

I would refer to my letter on case 313182-22 regarding the refusal of an extension of time to submit this related to a 383 page document.

Specific issues on document

No concessions whatever

I don't believe the document is particularly helpful to the Bórd in resolving any of the contested issues. I cannot find a single place in the entire 383 pages where NTA conceded that maybe one of the 120 submissions had a valid point which perhaps in the light of what they say ought to allow the Bórd make a modification to the scheme. This I believe is a feature of all the six reports to date. It is simply not credible that across six schemes, not a single point has been raised by any observer which has any merit whatsoever. Indeed on a cursory read of the many detailed points raised by Dún Laoghaire Rathdown Council, I do not believe any of them have been accepted.

I have a professional background in identifying say 30 points of disagreement on a substantive project. Normally each side would readily concede between them say 25 of those points and let the major five issues be resolved between the parties. The approach of not conceding an inch is in my view wholly unhelpful to the Bórd in resolving the relatively limited numbers of substantive issues raised on this corridor that are problematic in a planning or environmental sense. I have never in my professional experience seen such an unhelpful approach by one party in resolving such issues.

Additional arguments

I believe that a lot of the content of the 8 September 2022 document consists of extra arguments by NTA, not included in the original documents at all. This is particularly advantageous to them as they now know what the specific issues are and can concentrate resource on putting in additional points. I don't think they should be allowed do this. I think the Bórd has to disregard extra justifications only offered at this stage.

For example, the planning application does not cite significant demand for travel between UCD and Ballsbridge via Nutley Lane; this now seems to be introduced as a rationale for the scheme.

#### Nutley Lane

I note that in justifying this, the report refers to the Transport Strategy for the Greater Dublin Area 2016 to 2035. I would point out that in the map on page 71 of that document there is no provision for linking the Bray N11-UCD-Donnybrook and the Dun Laoghaire-Blackrock-Ballsbridge corridors together. As NTA have cited this in page 19 of their report as the basis for so doing, it is appropriate to point out that in a session of the Dail Transport and Communications Committee on 4 May 2022 (see page 7 of transcript), the Deputy Chief Executive of NTA in a contribution on a DART extension in Wicklow indicated that if something was not in the plan it lacked statutory authority to be submitted to the Bórd and could not be done.

I note the report also refers to 47 and 27X bus routes as being on Nutley Lane, but neglects to point out that the 27X runs three times a day across both directions and the 47 has 20 services a day (about one an hour) in each direction. While it is asserted on page 19 that "a significant demand was identified for travel between UCD and Ballsbridge" this assertion is unsupported by any evidence.

I note reference to the private shuttle bus in the AM and PM where no timetable information seems to be available. I suspect the passenger traffic on this is towards UCD in the AM and away from UCD in the PM, which are likely uncongested directions if the 2019 traffic surveys are looked at.

I think the residents of Nutley make a very strong case as to the environmental damage caused to their area in terms of loss of trees, pollution and the general degradation of their environment. Further the construction phase is 10 months as per page 9 Construction, so they have that level of muck and dirt. There is a weak case for the need to run bus services down Nutley Lane. There appears to be a much stronger case for using the existing road space for three lanes and bicycle facilities and of course Nutley Lane is identified as a secondary cycle route on the page 23 map.

I do not agree with the assertion on page 36 and 37 that turning Nutley Lane into a four lane highway "creates nicer places that are more desirable for people to locate in" or that "residents .. will also see a measurable increase in their quality of life".

Much the same considerations apply to Pembroke Road, but I simply do not have the time to go into them.

#### Bus stops

I note the comment of Dún Laoghaire Rathdown that bus stops be adequately set back from junctions. This seems a very valid point, not really addressed in a page of waffle at page 91. They do not address my point of placing a notice at bus stops to be moved indicating that this is proposed to happen. There is a bus timetable with a fair degree of space of every bus stop. It would have been very easy to print a timetable including a notice saying "we propose to move this stop to location x. If you have an issue write to y". The reply about statutory and non-statutory notice is irrelevant to this.

#### Hours of operation of the bus gates

I think my point of information on this being omitted from the text is correct; this is not the case in later documents on other corridors. The maps in scheme of arrangement are so small as to make this impossible to read easily. I think it is clear that my submission is that the AM and PM peak hours Monday to Friday should suffice, bearing in mind that a bus gate is an absolute bar to anyone driving through.

Aarhus

I think it is a very clear feature of Aarhus that options must be on the table for full consideration by the public. The response from page 120 forward is just a tedious recitation of a wholly internal to NTA process where NTA dismissed the option clearly indicated in the overall Greater Dublin Area Transport Plan then in place of using the existing routes to the significant environmental disadvantage of Nutley Lane and Pembroke Road with respectively 25 and 14 submissions substantively against the proposal.

  
Brendan Heneghan

on my own behalf