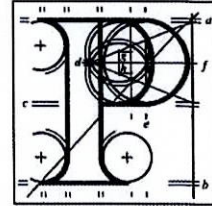


Our Case Number: ABP-313509-22



**An
Bord
Pleanála**

Cornelius and Mary O'Sullivan
67 Nutley Lane
Donnybrook
Dublin 4
D04X7N0

Date: 27 June 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

Tel
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

67 Nutley Lane,
Donnybrook,
Dublin D04 X7N0.

25th June, 2023

Reference No ABP-313509-22

An Bord Pleanala,
64 Marlborough Street,
Dublin 1.
D01 V902

AN BORD PLEANALA	
LDG-	_____
ABP-	<u>313509-22</u>
27 JUN 2023	
Fee: €	_____ Type: _____
Time: _____	By: <u>posk</u>

Bus Connects

Belfield/Blackrock to City Centre Core Bus Corridor

Scheme Co. Dublin Ref. ABP-313509-22

Dear Sir/Madam,

I refer to your letter of the 2nd June 2023 and your invitation to make a submission in accordance with Section 217B of the Planning and Development Act 2000 as amended in relation to the submission dated 8th September, 2022 from the National Transport Authority.

In this regard, we enclose for ease of reference, a copy of our submission dated 28th June 2022 which covers the core points in our observations on the NTA initial submission to An Bord Pleanala.

We respectfully request that the Board review this again in the course of its consideration of this NTA proposal.

We have reviewed the responses of the NTA to our original submission to the Board.

At the outset we must reiterate that we accept the rationale for Bus Connects and are not opposed to the project.

We are sure that we speak for the Residents on Nutley Lane when we say that we are disheartened and disgusted with the way the NTA has "played" us residents in regard to the development of its "preferred route" (EPR).

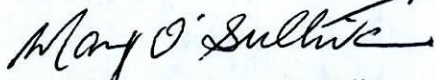
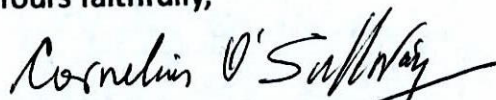
The route referred to as Option NL. 2 was developed by the NTA at the outset and all the subsequent studies, meetings, concessions and proposals by us were deemed to perform poorly against this "Preferred option".

In response to this invitation to make a further submission to the Board we wish to place before the Board the following observations:

- The resident's case for the preservation of 70/80 trees and hundreds of metres of mature hedges have been brushed aside. This project involves an inordinate amount of destruction of the natural environment on Nutley Lane. The destruction of 300 metres of mature hedging and its replacement with a 300 metre concrete wall can only be described as vandalism. We earnestly request that the Board should reject the concrete wall. In the event that the hedges and trees are cut down, the Board should insist on replacing them with a high quality wire security fence and inside this fence the proposed new hedging (as planned by the NTA) be planted. This would significantly improve its appearance and partially restore the natural environment. The boundary currently consists of such a fence and hedge. This would be a substantially less costly and more environmentally friendly option.
- No account was taken of the arguments in regard to the greatly changed patterns of traffic flows arising from working from home arrangements.
- No account has been taken of the impact of traffic especially ambulance traffic arising from the proposed Maternity hospital.

- We earnestly ask the Board to look carefully at the Dublin City Council observations in regard to the congestion that will arise from the NTA plan for the use of bus gates and queue relocation on the Merrion Road. This will cause traffic back up on Nutley Lane which together with all the junction controls and pedestrian crossings on Nutley Lane can only lead to a gridlock situation on Nutley Lane. This is common sense and no amount of clever traffic management, charts etc. will disprove this situation.
- Dublin City Council observations rightly recommend that soft landscaping should be considered before hard landscaping. The level of information in the NTA proposal in regard to the replacement of trees etc is partial and vague. The Board should insist on an extensive mature tree re-planting and extensive soft landscaping on Nutley Lane to replace the destruction arising from the NTA proposal.
- Dublin City Council raised very serious concerns regarding drainage and mentioned in particular Nutley Lane "Nutley Lane where it meets Merrion Road and Elm Park stream crossings are of a particular concern". The Elm Park stream is a protected waterbody under Article 4 of the Water Framework Directive.

Yours faithfully,



Cornelius and Mary O Sullivan.

67 Nutley Lane,
Donnybrook,
Dublin 4,
D04 X7N0

28th June, 2022.

An Bord Pleanala,
Strategic Infrastructure Division,
64 Marlborough St.,
Dublin 1.
D01 V902

BusConnects

Belfield/Blackrock to City Centre Core Bus Corridor Scheme

Reference No 313509

Dear Sir/Madam,

As indicated above we live on Nutley Lane and have done so for over 40 years. We have taken an active and constructive involvement in all the Forums and private meetings with the NTA throughout the consultation process.

We wish to submit the following observation in regard to the above development and we request that the final decision of the Bord will include conditions that reflect our observation or include actions that mitigate the negative impact of the development from the view point of the residents.

Summary of our observation.

- We, with the Resident's group on Nutley Lane within the Nutley Resident's Association, accept the rationale for BusConnects and we are not opposed to the project. The imperative to reduce car dependency and improve access to sustainable transport in Dublin has never been clearer.
- Nutley Lane, currently, has the capacity to take 3 traffic lanes. It is our case that this capacity should be used for;
 1. Dedicated Bus Lane – Stillorgan Road to Merrion Road
 2. Dedicated Car Lane – Stillorgan Road to Merrion Road
 3. Shared Lane Bus/Car – Merrion Road to Stillorgan Road
 4. A 2 way cycle lane (replacing a footpath).

- The NTA plan before the Bord proposes a road widening for a 4 lane road. This additional lane is primarily to facilitate cars. The construction of this additional lane will give rise to extensive destruction of almost all of the mature natural environment on Nutley Lane including;
 1. Cutting down approx. 75/80 mature trees.
 2. Cutting down 200 meters of 3.5m high evergreen hedge at Elm Park Golf Club boundary.
 3. Cutting down 200 meters of beech hedge at St Vincent's Hospital boundary.
 4. Many of the trees to be felled are 30/50ft high and some at Elm Park Golf Club are in place for over a century.
- This level of destruction of the natural environment is contrary to the strategic objectives of BusConnects as it facilitates car traffic. In this era of protection of the natural environment to support the Government's climate change mitigation effort (carbon sequestration), this destruction is totally unwarranted and contrary to national policy and contrary to common sense. This is not a solution acceptable in the year 2022. This level of destruction takes place on a short length of road – approx. 6/700m - which amplifies the scale and impact on the natural environment.
- The Taoiseach M. Martin described the core of this matter very well, at the National Biodiversity Conference on 9th June 2022; "Nature provides the essentials for human life but it must be treated with the respect it deserves. The time has come for a new era of stewardship of the natural world"

Context and background to our observation

- Nutley Lane Resident's group in discussions with the NTA, put forward a number of constructive proposals aimed at mitigating the worst aspects of the NTA preferred option including (but not limited to)
 1. Having a single two way cycle lane in place of 2 separate lanes (accepted)
 2. Having a single – one way car lane with 2 bus lanes (rejected by NTA)
 3. Having a 4 lane arrangement at each end of the road and 3 lanes at the centre section (which would obviate the destruction of a significant amount of the trees and hedges) (rejected by NTA)
- In the NTA rejection of our proposals, their responses were always based on the perceived need to ensure that bus movements would not be hindered or slowed down. However, in this regard the following points are very relevant;
 1. On the UCD to City Centre route, the NTA proposal, with which we agree, provides dedicated bus and car lanes. – So, no issue there.
 2. Nutley Lane is only about 700M long
 3. There are major controlled junctions at each end – Stillorgan road and Merrion road;
 4. There will be 2 on demand Toucan crossings on the road;

5. There are junctions on Nutley Lane from Nutley Road, Nutley Park, Elm Park, and Nutley Avenue with entering/exiting traffic. This is especially the case from Nutley Avenue where there is a major secondary school.
 6. There are 23 private house exits directly onto Nutley Lane;
 7. The prime traffic and pedestrian entrance/exit to 2 major hospitals through which all ambulance A&E traffic takes place is on Nutley Lane (and this will also be the prime entrance to the new National Maternity Hospital).
 8. The entrance/exit to Elm Park Golf Club (2000 members) is on Nutley Lane
 9. There is a vehicle entrance/exit to the RTE campus on Nutley Lane.
 10. The sole entrance/exit to the Merrion Shopping Centre (Tesco supermarket) for cars and delivery trucks is on Nutley Lane.
 11. The sole entrance/exit for the Brooklands apartment complex and Broc House Aparthotel is on Nutley Lane.
- All these junctions/exits/pedestrian crossings/traffic lights will ensure that achieving time savings on this short length of road is near impossible and bus priority arrangements will not overcome all the potential stop points. Accordingly, putting yet another lane on the road does nothing to underpin BusConnects objective. On the contrary, it will only draw more car traffic and, as stated, gives rise to huge destruction of the natural environment.
 - Nutley Lane is the major access route for ambulances to St. Vincent's Hospital complex. Instead of drawing more car traffic into the road, the objective should be to limit car traffic so as to clear capacity for the almost constant stream of ambulances going to/from the hospital and one of the busiest A&E departments in Dublin.
 - It is also essential to recognise that all the BusConnects routes on this spine terminate in UCD. Nutley Lane, and more specifically, the St. Vincent's Hospital complex (now to include the National Maternity Hospital) is the last significant stop on the outgoing leg (city to UCD). Likewise, it's the first such stop on the incoming leg (UCD to city). Accordingly, after the hospital stop, buses are traversing Nutley Lane almost solely to get to UCD where the main terminus is situated so as to turn and get back into schedule. There are no alternative bus parking/turning facility in the area. So, speed/timing is not a critical factor on this final leg and sharing the third lane is a practical solution.

Traffic Pollution and Smarter Travel

There are no measures in the NTA proposal which seek to curtail the growth in car usage. On the contrary, the additional lane will give rise to growth in car usage leading to increased emissions, health impacts, air/noise pollution and congestion on this residential road. There are 23 family homes within 10m of the road. Most importantly, the additional lane is the sole cause of the extensive felling of trees and hedges.

In summary, the 3 lane proposal which we recommend and the one that greatly limits the destruction of the natural environment will deliver a good BusConnects service. With the Resident's Group and the Nutley Resident's Association we strongly urge the Bord to adopt the 3 lane concept.

Consequential issues.

1. Removal of Ramps

There are 6 traffic ramps on Nutley Lane. These were put in place over 20 years ago in an effort to reduce traffic speeds. They have no effect on car/van speeds as they are formed with a gentle slope. However, they are a source of problems for;

- 1. Ambulances rushing to the A&E are forced to brake and crawl over each of the 6 ramps. Drivers have confirmed that they are a distinct problem when transporting very ill casualties.**
- 2. Double deck buses are also forced to brake and ease over the ramps. They then loudly accelerate away, only to repeat this at each ramp. This engine roar and exhaust pollution adds to the noise and pollution on the road.**

It is not clear in the published documents if the ramps are to remain on the road.

We earnestly request the Bord to put a condition into the final decision that removes these ramps. In their place it should be possible to put electronic messaging on speeds etc.

In the event that the Bord does not accept our recommendation for a 3 lane road.

2. Golf Club Boundary Wall.

The boundary of Elm Park Golf Club on Nutley Lane is approximately 350m long and consists of very large evergreen trees (at the hospital end) and old deciduous trees at the main gate into the club. In between these is a 300m long, 3.5m high evergreen hedge. All of this is to be demolished, as well as 17 semi mature trees on the footpath in front of the hedge. This mature nature boundary is to be replaced by a c.350m concrete wall at the same height as the existing fence. Apart from the destruction of the natural habitats in the existing environment, the replacement by a 350m concrete wall, without attempting to mitigate this destruction, highlights the total lack of concern the NTA has for the natural environment in this instance. Residents were amazed to see, in the NTA plans, that inside

the wall in the golf club the NTA plans to replant the hedge while outside, on the public road, where mature trees and hedges were demolished ivy is to be used to camouflage this appalling wall.

Surely, a better treatment of this wall could be developed such as having V shaped indents at intervals along the wall, into which semi mature "lollipop" style trees could be planted on the roadside of the wall. These would not impede cyclists on the adjoining cycle lane and would go some way to replacing the many trees that are to be felled at this section of the road and improve the appearance of such an extensive concrete wall.

3. The Proposed Cycle Lane.

We understand that Nutley Lane is deemed a secondary cycle route. The proposed 2 way cycle lane, in the NTA plan for Nutley Lane, is to be constructed on the site of the footpath from the Golf Club gate to St. Vincent's Hospital. Accordingly, this footpath is to be eliminated.

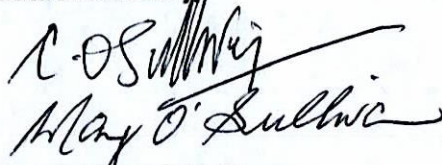
We consider that it is essential for the Bord to be aware of the following relevant facts.

This footpath is a busy one with hospital visitors, employees etc., coming and going to/from the Stillorgan road direction. It is also used by students from the UCD School of Nursing/Midwifery and Health Systems and the UCD School of Medicine when walking to/from the Hospital complex.

Removing this footpath will result in all these pedestrians having to cross Nutley Lane (via the Toucan Crossing at the Golf Club gate) then walking down on the other side of the road and crossing back (via the Toucan Crossing at the hospital entrance). Apart from the inconvenience and danger of this crossing and recrossing it also results in stopping all bus and car traffic.

The elimination of this direct pedestrian pathway is questionable especially when there are alternative safer cycle routes through the Nutley area.

Yours faithfully,



Con & Mary O Sullivan.

Please see attached

1. 8 Photographs depicting the natural environment on Nutley Lane.
2. Cheque 50 euro payable to An Bord Pleanala.