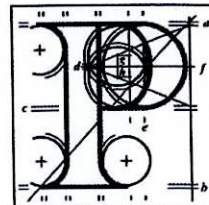


**Our Case Number:** ABP-313509-22



**An  
Bord  
Pleanála**

Hilary and Rosemary Hough  
79 Nutley Lane  
Donnybrook  
Dublin 4

**Date:** 07 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

**Tel**  
**Glaos Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Ríomhphost**

**Tel**  
**LoCall**  
**Fax**  
**Website**  
**Email**

(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

**Fw: Case No ABP-313509-22.**

Klaudia Wieszowska <kludia.wiezowska@pleanala.ie>

Fri 7/7/2023 8:52 AM

To: Klaudia Wieszowska <kludia.wiezowska@pleanala.ie>

**From:** Sarah Caulfield <s.caulfield@pleanala.ie>

**Sent:** Thursday, July 6, 2023 3:41 PM

**To:** [REDACTED] <[REDACTED]@pleanala.ie>

**Cc:** Klaudia Wieszowska <kludia.wiezowska@pleanala.ie>

**Subject:** RE: Case No ABP-313509-22

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Dear Hilary,

The Board acknowledges receipt of your email and attached submission on the above application.

Kind Regards,  
Sarah

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**From:** Hilary Hough [REDACTED]

**Sent:** Thursday, July 6, 2023 1:49 PM

**To:** Bord <bord@pleanala.ie>

**Subject:** Case No ABP-313509-22

We attach submission with attachment in respect of the NTA submission to An Bord Pleanala, in the above Case, dated September 8th 2022

Yours sincerely

Hilary and Rosemary Hough

79 Nutley Lane,  
Donnybrook  
Dublin 4  
05/07/2023

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

Bus Connects  
UCD Ballsbridge to City Centre (Part of Belfield / Blackrock to City Centre Core Bus Corridor Scheme)  
Reference No. ABP 313509-22  
Submission by Hilary and Rosemary Hough, 79 Nutley Lane

We have already submitted detailed observations (see attached).

In its response dated September 2022 the NTA did not take into account any of the observations and constructive suggestions that we, or indeed any of the other residents of Nutley Lane, made. Their response merely reiterated their position, on all of the issues, as it was prior to any observations from residents. We hope that An Bord Pleanála will give due consideration to and take into account our observations when coming to a decision on the application.

In particular we draw An Bord's attention to the fact that the chosen option NL2 ranks least well of six of the options reviewed by the NTA in terms of environmental impact.

*"In terms of the sub-criteria under the Environmental criterion, due to the four-lane cross section within the preferred option it ranked less well than those options proposing three-lane and two-lane cross sections under Flora & Fauna, Landscape & Visual, and Land Use Character due to the required removal of the hedgerow on the eastern boundary"*

*"Due to the retention of two-way general traffic within the preferred option it ranked worse than those options proposing a reduction in general traffic under Air Quality and Noise & Vibration."* (NTA submission to An Bord Pleanála)

Option NL2, involves the removal of c80 mature trees, many of which are up to 15mtrs high and some up to 100 years old, along the eastern boundary of Nutley Lane and the removal of 2 hedgerows, approx. 3mtrs high, along the boundary of the Elm Park Golf Club, to be replaced by a 'reinforced concrete wall with climbing vegetation (e.g. ivy) planted on the road side, and a hedgerow reinstated on the golf course side' and along the boundary of SVUH.

The reason why it ranks least well of the options is that it proposes four rather than three traffic lanes. This fourth lane is for the exclusive of cars which goes against the overall objectives of Bus Connects to reduce car usage and, ironically, it is this additional car lane which will lead to the destruction of the trees and hedges.

**In the context of the Government's stated policy of protecting the natural environment and mitigating the impact of climate change it makes no sense that the chosen option is the one that does greatest damage to the natural environment and facilitates increased carbon emissions by providing an additional dedicated car lane.**



We previously observed and now submit that Option NL3, with some minor amendments, would significantly reduce the environmental impact by retaining most but not all of the trees while at the same time delivering substantially all of the bus traffic objectives of Option NL2

1. Adopting Option NL3

*"Option NL3: As per NL2 from the R138 Stillorgan Road to Nutley Road and from St. Vincent's University Hospital entrance to the R118 Merrion Road, however, reduced to only two general traffic lanes between Nutley Road and St. Vincent's University Hospital entrance;*

*This arrangement would be facilitated through the introduction of a Bus Gate on the northern side the Nutley Road junction"*

*"In summary, this route option would, subject to confirmation at the scheme design stage, result in the following characteristics:*

- *Fully segregated bus priority provided between R138 Stillorgan Road and Nutley Road and also between St. Vincent's Hospital and Merrion Road*
- *The provision of bus priority along the section of the route between Nutley Road and St. Vincent's Hospital through the elimination of through traffic from the installation of a bus gate on Nutley Lane at its junction with Nutley Road;*
- ***Retention of the existing footpath and trees both sides of the road between Nutley Road and St. Vincent's Hospital;***
- *Signalisation of the junction of Nutley Lane and Nutley Park;*
- *New Toucan crossings at Nutley Park and Elm Park;*
- *Removal of all on-street parking; and*
- *Land acquisition along from St. Vincent's Hospital, Elm Park and RTE frontages with associated tree removal, albeit significantly less land acquisition required from Elm Park relative to NL2."*

*(2020 14-draft preferred route options report, Bus Connects)*

A minor variation on Option NL3 which would improve its effectiveness could be

- Dedicated Bus Lane – Stillorgan Road to Merrion Road
- Dedicated Car Lane – Stillorgan Road to Merrion Road
- Shared Lane Bus/Car – Merrion Road to Stillorgan Road facilitating bus priority by bus priority signalling.
- A 2 way cycle lane

It is interesting to note that in outlining its reasons for rejection of various options the NTA, in its submission to An Bord Pleanála in September 2022, does not specifically refer to Option NL3 but rather states its rationale for rejection of Options NL4, NL5 and NL7.

The NL3 Option could be further enhanced by adoption of Option CF3 in relation to cycle tracks which would remove the proposed cycle lanes from Nutley Lane to a '*Parallel cycle route via Woodbine Road and Trimleston Avenue to connect UCD to Merrion Road*' (NTA submission to An Bord Pleanála, September 2022)

This option would significantly improve the safety for cyclists.

We hope that An Bord Pleanála will take this submission into account as a constructive proposal to mitigate the environmental impact while delivering substantially all the bus traffic objectives.

Yours sincerely

Hilary and Rosemary Hough



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

**Bus Connects**

**UCD Ballsbridge to City Centre (Part of Belfield / Blackrock to City Centre Core Bus Corridor Scheme)**

**Reference No. 313509**

**Observations by Hilary and Rosemary Hough, 79 Nutley Lane**

We have been residents of Nutley Lane for over 30 years.

Together with other residents of Nutley Lane, we attended all of the community forums arranged by the NTA and also had a number of direct meetings with the NTA representatives of Bus Connects. At these meetings we made a number of detailed proposals designed to mitigate the environmental impact, particularly the removal of trees and hedges. While our proposals were considered and some of them were included for consideration in Options NL3 to NL7, none of them were included in the preferred option (NL2) chosen by Bus Connects.

After all of the 'consultations' and discussions the current NTA proposal is almost identical to its proposal on day one with the only difference being a two way cycle lane rather than two one way cycle lanes. Given that the 'consultation' process did not result in any material changes to the original proposal, particularly in relation to the destruction of trees and hedges, we feel that it was merely a 'window dressing' exercise which is now being presented as a serious consultation with affected residents.

In making this submission we wish to stress that we are not against the overall concept of the creation of bus and cycle lanes to improve the transport infrastructure. We do, however, wish to object to some aspects of the proposed implementation of the scheme on Nutley Lane and to make recommendations on how it can be improved to reduce the negative environmental impact of the proposal.

**NTA Preferred Option**

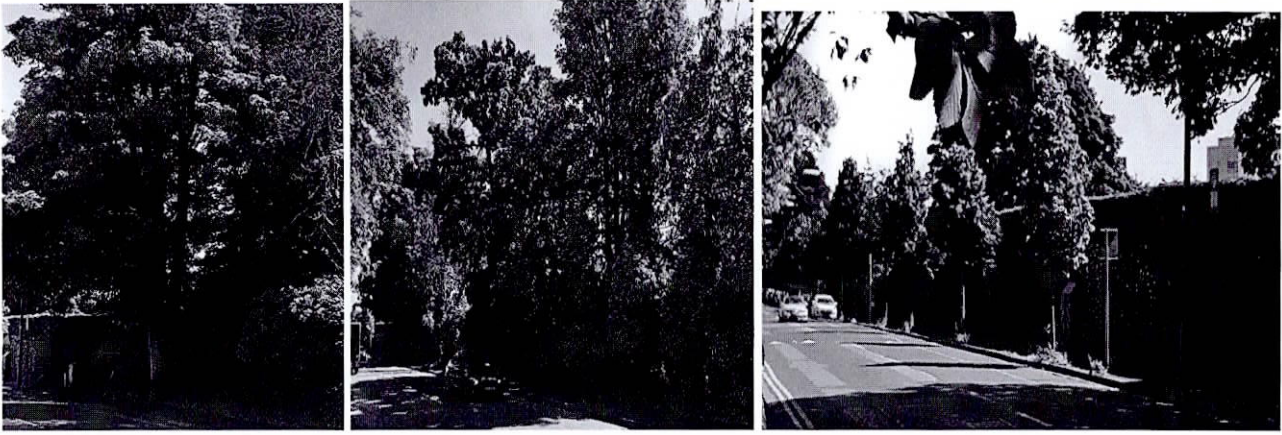
Seven options were considered by Bus Connects before deciding on Option NL2. The NTA submission to An Bord Pleanála states:

*"The draft Preferred Route Option was identified as Option NL2, comprising two bus lanes and two traffic lanes along the majority of this section, along with the realignment of the roadway and footpath provision outlined in Section 3.4.1, and the two-way cycle track described above."*

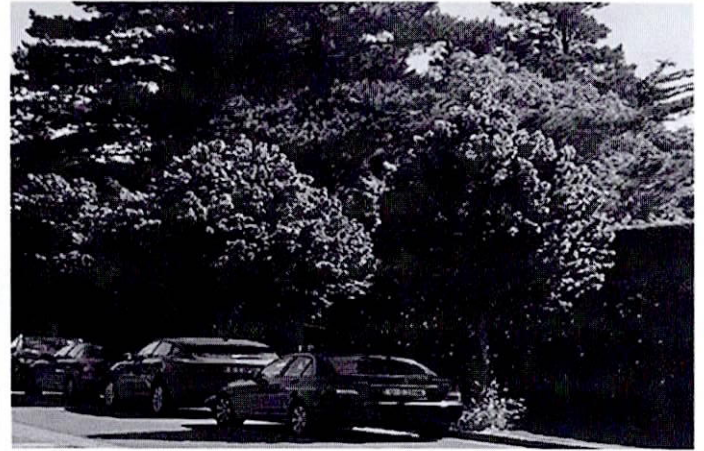
The NTA preferred option, Option NL2, involves the removal of c80 mature trees, many of which are up to 15mtrs high and some up to 100 years old, along the eastern boundary of Nutley Lane and the removal of 2 hedgerows, approx. 3mtrs high, along the boundary of the Elm Park Golf Club, to be replaced by a 'reinforced concrete wall with climbing vegetation (e.g. ivy) planted on the road side, and a hedgerow reinstated on the golf course side' and along the boundary of SVUH.

(A concrete wall would be totally inappropriate and should have been proposed to be of granite or other natural brick to minimise the visual and environmental impact on a residential area)

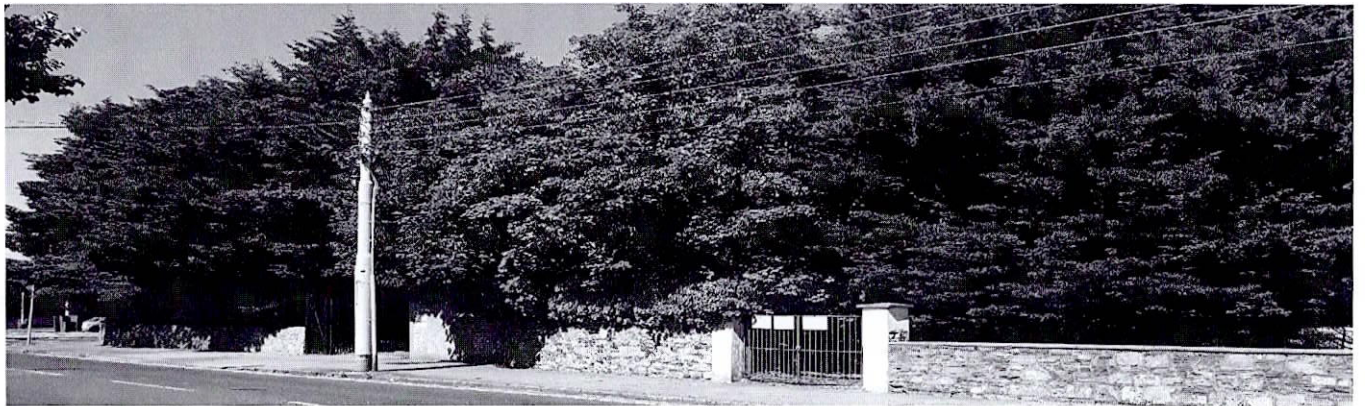




Trees and hedges at Elm Park Golf Club to be removed



Trees and hedges at SVUH to be removed



Trees at EIR and RTE to be removed

The preferred option Option NL2 ranks least well of six of the options reviewed by the NTA in terms of environmental impact.

*"In terms of the sub-criteria under the Environmental criterion, due to the four-lane cross section within the preferred option it ranked less well than those options proposing three-lane and two-lane cross sections under Flora & Fauna, Landscape & Visual, and Land Use Character due to the required removal of the hedgerow on the eastern boundary"*



*"Due to the retention of two-way general traffic within the preferred option it ranked worse than those options proposing a reduction in general traffic under Air Quality and Noise & Vibration."* (NTA submission to An Bord Pleanála)

The reason why it ranks least well of the options is that it proposes four rather than three traffic lanes. This fourth lane is for the exclusive of cars which goes against the overall objectives of Bus Connects to reduce car usage and, ironically, it is this additional car lane which will lead to the destruction of the trees and hedges.

**In the context of the Government's stated policy of protecting the natural environment and mitigating the impact of climate change it makes no sense that the chosen option is the one that does greatest damage to the natural environment and facilitates increased carbon emissions by providing an additional dedicated car lane.**

### **Viable Alternative Options**

Nutley Lane currently has capacity to accommodate three vehicle lanes and one cycle lane. The inclusion of a fourth vehicle lane is to facilitate cars which goes against the overall objective of reducing the usage of cars and increasing usage of public transport. Additionally the inclusion of a fourth lane also has the greatest negative environmental impact both in terms of the destruction of trees and hedges and increased air and noise pollution resulting in a diminution of the quality of life of the residents and negatively impacting their physical and mental well being. As a result of the potential impact on the quality of life a number of residents on Nutley Lane have put their houses on the market but have been unable to find purchasers because of the Bus Connects proposals for Nutley Lane.

There are a number of options for three vehicle lanes that would contribute to a reduction in car usage and also significantly reduce the environmental impact while achieving the desired bus priority requirements.

#### **1. Adopting Option NL3**

*"Option NL3: As per NL2 from the R138 Stillorgan Road to Nutley Road and from St. Vincent's University Hospital entrance to the R118 Merrion Road, however, reduced to only two general traffic lanes between Nutley Road and St. Vincent's University Hospital entrance;  
This arrangement would be facilitated through the introduction of a Bus Gate on the northern side the Nutley Road junction"*

*"In summary, this route option would, subject to confirmation at the scheme design stage, result in the following characteristics:*

- *Fully segregated bus priority provided between R138 Stillorgan Road and Nutley Road and also between St. Vincent's Hospital and Merrion Road*
- *The provision of bus priority along the section of the route between Nutley Road and St. Vincent's Hospital through the elimination of through traffic from the installation of a bus gate on Nutley Lane at its junction with Nutley Road;*
- *Retention of the existing footpath and trees both sides of the road between Nutley Road and St. Vincent's Hospital;*
- *Signalisation of the junction of Nutley Lane and Nutley Park;*
- *New Toucan crossings at Nutley Park and Elm Park;*
- *Removal of all on-street parking; and*
- *Land acquisition along from St. Vincent's Hospital, Elm Park and RTE frontages with associated tree removal, albeit significantly less land acquisition required from Elm Park relative to NL2.*  
*(2020 14-draft preferred route options report, Bus Connects)*

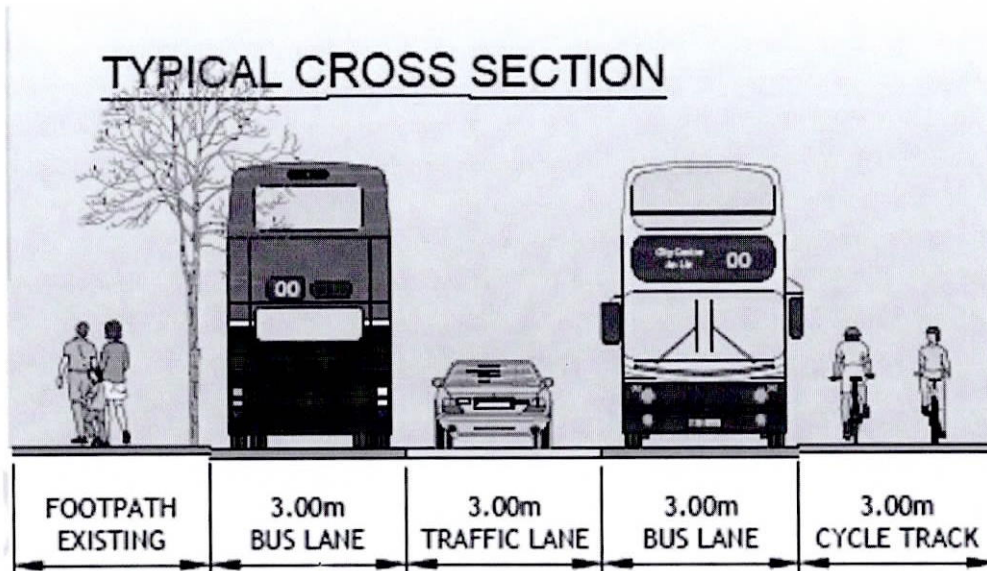
#### **2. Adopting Option NL4**

*"Option NL4: As per NL2 from the R138 Stillorgan Road to Elm Park Golf & Sports Club entrance and from St. Vincent's University Hospital entrance to the R118 Merrion Road, however, reduced to a single one-way northbound general traffic lane between Nutley Road and St. Vincent's University Hospital entrance – with potential for offline traffic management measures. A continuous bus lane is proposed in either direction"*



*"In summary, this route option would, subject to confirmation at the scheme design stage, result in the following characteristics:*

- *Fully segregated bus priority along the entire section;*
- *Retention of the existing footpath and trees on the residential side of the road between Nutley Road and Nutley Avenue;*
- *New Toucan crossings at Nutley Park and Elm Park;*
- *Removal of all on-street parking; and*
- *Land acquisition along from St. Vincent's Hospital, Elm Park and RTE frontages with associated tree removal, albeit significantly less land acquisition required from Elm Park relative to NL2. (2020 14-draft preferred route options report, Bus Connects)*



These options were rejected by the NTA primarily because they contended that they would have a greater impact on bus reliability and timing than the preferred option

*'While other options did perform well under many criteria, the expected impacts in relation to Transport Quality & Reliability and Traffic Network Integration were considerably more than in the preferred option. In particular is the likely associated reduction of bus journey time reliability and potential impacts on surrounding residential streets due to local and through traffic detouring onto other streets such as Ailesbury Road and Nutley Road, and beyond, in the options assessed which did not provide full physical bus priority.'* (2020 14-draft preferred route options report, Bus Connects)

We would challenge this rationale for rejection of the options on the following basis:

- The NTA preferred option envisages two traffic light controlled junctions and two toucan crossings on the 700mtr length of Nutley Lane. The impact of these on bus timing reliability would be similar to the impact of the proposals in the rejected options.
- There are 23 private residences, three apartment blocks, Merrion Shopping Centre, SVUH and the planned National Maternity Hospital, Elm Park Golf Club, EIR and RTE exiting onto Nutley Lane all of which would equally impair bus timing under all options.
- Additionally there are three cul de sacs, Nutley Avenue, Nutley Park and Elm Park and one two way road, Nutley Road also exiting onto Nutley Lane with similar impact. The entry to and exit from St Michael's College is on Nutley Avenue and all of the very heavy traffic there during school terms will also have to enter and exit via Nutley Lane.
- The contention that bus reliability timing would be improved under the preferred option, given the range of exits and entries along the full extent of the road, does not make any sense and given that the road is only 700mtrs long it would not make any difference to bus reliability timings on the overall UCD/City route.
- It is also important to point out that the Nutley Lane part of the overall route is only to facilitate termination at and return from UCD and does not give any additional bus access to residents of Nutley Lane.



- Traffic 'detouring' would help to mitigate the impact on Nutley Lane which is the only road directly impacted by the proposals

### 3. Alternative Option

An alternative option which would be a minor variation on Option NL3 could be

- Dedicated Bus Lane – Stillorgan Road to Merrion Road
- Dedicated Car Lane – Stillorgan Road to Merrion Road
- Shared Lane Bus/Car – Merrion Road to Stillorgan Road facilitating bus priority by bus priority signalling.
- A 2 way cycle lane

All of these options would have the benefit of reducing car traffic, mitigating the environmental impact and providing bus priority.

### Alternative cycle track

In our discussions with NTA Bus Connects the residents of Nutley Lane questioned the rational and fairness of putting the cycle track on Nutley Lane which would have to take the two new bus lanes and suggested a number of alternatives on adjacent roads that link the Merrion Road with the Stillorgan Road. One of these options was considered by the NTA as set out below

**'Option CF3 - Parallel cycle route via Woodbine Road and Trimleston Avenue to connect UCD to Merrion Road and the Blackrock to Merrion CBC.**

**Inbound (Southbound):** The cycle route proceeds along Trimleston Avenue from the Rock Road, linking to Woodbine Road via Woodbine Park and Trimleston Avenue. The cycle route would continue on along Woodbine Road before connecting to both the west and east bound cycle facilities on the northern side of the R138 Stillorgan Road Interchange.

**Outbound (Northbound):** The northbound option follows the same route as southbound.' (2020 14-draft preferred route options report, Bus Connects)

If implemented this would not only significantly reduce the pressure on Nutley Lane but it would also be a much safer option for cyclists given the low level of traffic on the adjacent roads. However it was rejected by the NTA and while the general criteria for evaluating cycle tracks were listed no explanation was given as to why it was rejected. We can only assume that it was considered administratively easier for the NTA to include the cycle track in the Nutley Lane proposals rather than having to go through the process of designing and implementing a scheme for the adjacent roads, thus ignoring the impact on Nutley Lane residents.

### Recommendation

Given that the NTA preferred option ignores all the suggestions of Nutley Lane residents in various submissions and discussions with the Bus Connects team we strongly recommend that the proposal, as currently presented, be referred back for consideration of the alternatives set out above and development of a scheme which will mitigate the range of negative impacts on the residents of Nutley Lane

Hilary Hough

Rosemary Hough