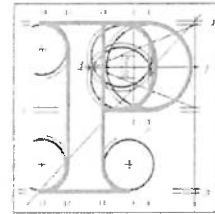


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Alan Murphy
23 Delaford Lawn
Knocklyon
Dublin 16

Date: 24 April 2024

Re: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme
Templeogue/Rathfarnham to City Centre

Dear Sir / Madam,


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

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Eimear Reilly

Executive Officer
Direct Line: 01-8737184

HA02A

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An Bord Pleanála (Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1
D01 V902

23 Delaford Lawn
Knocklyon
Dublin 16

AN BORD PLEANÁLA

LDG- _____
ABP- _____

26 MAR 2024

Fee: € _____ Type: _____
Time: 12:35 By: Hand

316272 / 316377

16th March 2024

BusConnects Templeogue / Rathfarnham to City Centre CBC proposals and planning application Impact on Rathfarnham Castle Park

Dear Sirs,

I wish to strongly reiterate my objection to the proposed substantial impact on Rathfarnham Castle Park for the purposes of widening the Grange Road. The NTA response documents make it clear that this wonderful wildlife habitat and important local amenity has only now been (very cursorily) looked at, thanks presumably to the numerous submissions made highlighting its importance. However its value from numerous perspectives has clearly still not been properly appreciated.

The Woodland of Rathfarnham Castle Park is a fantastic amenity for the local area. It has a diverse range of wildlife, especially protected wild birds, bats, frogs, bees, ducks and squirrels. There is a local river which runs through the woodland area, the Glin River, which is very sensitive to change and blocks easily. The peaceful woodland play space itself is particularly loved by local autistic children as it meets their sensory needs in a way that regular playgrounds do not. It is a vital resource for local autistic children.

The NTA has finally admitted that: ***"Rathfarnham Castle Park has not previously been identified as an ex-situ site for Special Conservation Interest wintering birds, but does nonetheless support wintering birds such as ducks, moorhens and some SCI gulls."*** This is a very grudging response to the extensive evidence provided by various parties regarding the large variety of protected species inhabiting the Park. It confirms that the Park was not originally properly assessed.

The environmental reports state that the noise, vibration, increased human presence and visual deterrent of construction traffic associated with site clearance and construction are ***"likely to displace breeding birds from habitat areas adjacent to the footprint of the Proposed Scheme"....*** ***"All areas within 250m of the Proposed Scheme will be subject to construction activities which generate noise levels greater than 50dB (e.g. piling, rock-breaking, etc.) These activities will result in a greater magnitude of effect on the baseline environment. As a result, noise and vibration from these activities, will have the potential to result in the reduced breeding success of breeding bird species in the vicinity of the works...."*** (Planning Report pg 445, extracted from Ch 12 EIAR.)

Rathfarnham Castle Park is so small that the entirety of the Park, including the river, the duck pond, the Woodland area and the open grassy areas are all contained within 250m of the proposed construction location. Effectively, the Park will become barren, should these lengthy intensive

construction works take place. It will no longer be a successful breeding location for all types of diverse wildlife, including many protected species. This would be an appalling, but inevitable, result, should the works proceed.

Similarly, the NTA CPO Response [pg 65] acknowledges that *"In relation to breeding birds there is a likely significant residual effect at the local geographic scale (habitat loss, disturbance / displacement)."* Similarly, the CPO Response [pg 66] indicates that there will be a **significant negative effect on the conservation status of breeding birds at the local geographic scale.**

Again, Rathfarnham Castle Park is a lovely peaceful park which, despite its small size, is a very successful breeding environment for protected species and is highly valued amenity in the local area. It should be protected if at all possible. It is a vital resource for the local community.

It is particularly galling that the NTA state in page 442 of the Planning Response that *"With regards to the option of acquiring land from properties on the southern side of Grange Road between Butterfield Avenue/Rathfarnham Road junction and Nutgrove/Grange Road junction the landtake would have impacted significantly more properties and as such was not considered."*

Given the importance of Rathfarnham Castle Park and its Woodland area, any reasonable alternatives such as taking land from the opposite side of the road should at least have been considered. It is quite incredible that this very basic level of due diligence was not undertaken. **Accordingly, the NTA did not undertake a proper analysis or consideration of the area and their decision to CPO a large section of the Park was fundamentally flawed.**

In my view, **the bus corridor should terminate at the end of the Rathfarnham Village bypass (by the Butterfield Avenue junction).** There should be a signal controlled priority light to give priority to outbound buses passing the Park. (There is already an inbound bus lane running alongside the Park). Otherwise, irreparable permanent harm will be caused in terms of a major significant losses - biodiversity, carbon sequestration in the woodland, breeding habitats of protected species and other wild animals, not to mention the harm caused to a vulnerable group such as local autistic children in the loss of their natural play space.

Given that the park is situated right at the end of the bus corridor, and given that the subsequent roads do not offer scope for a continuing bus corridor in any event, it makes absolutely no sense to cut down such a large amount of woodland for the sake of 450 metres, and to subject the entire Park to the intensive noise, vibration and upheaval of major construction works. Especially when it is clear from the above that the only improvement really needed to Grange Road is the prioritisation of outbound bus services. These can be done with a bus priority light, without needing to impact the Park at all. The rest of the existing >15m roadway is adequate for the existing inbound bus lane, two general traffic lanes and pedestrian and cycling facilities. Unnecessarily destroying so much of this wonderful peaceful woodland habitat and natural play space would be unconscionable. Please take the opportunity to reconsider this aspect of the bus corridor, when making your decision. Many thanks.

Yours faithfully,

Alan Murphy.

