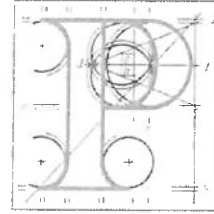


**Our Case Number:** ABP-316272-23



**An  
Bord  
Pleanála**

Daria Sochacka and William Mc Elinn  
49 Rathfarnham Road  
Terenure

**Date:** 24 April 2024

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

Dear Sir / Madam,

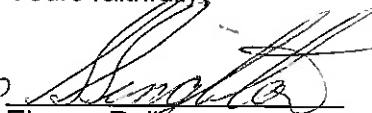
An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

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](mailto: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

**Teil** (01) 858 8100  
**Glaó Áitiúil** 1800 275 175  
**Facs** (01) 872 2684  
**Láithreán Gréasáin** [www.pleanala.ie](http://www.pleanala.ie)  
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64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

49 Rathfarnham Road

Terenure  
Dublin 6W

<b>AN BORD PLEANÁLA</b>	
LDG-	_____
ABP-	_____
26 MAR 2024	
Fee: €	_____ Type: _____
Time: 12:35	By: Hand

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

316272/316377

25<sup>th</sup> March 2024

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

Dear Sirs,

We wish to take the opportunity to restate our strong objection to the proposal to compulsorily acquire a significant portion of the Woodland area of Rathfarnham Castle Park. We have reviewed the environmental reports and other materials, along with the NTA response documents. It is clear that the NTA is simply defending its design, rather than objectively reassessing the issues in light of the valid concerns raised.

We also disagree with the grouping of questions into broad topics by the NTA in responding to the public consultation, as this has been used to avoid answering detailed or specific questions from the public, with the NTA's responses being generic and broad.

While we appreciate the challenges presented in providing infrastructure, this simply does not justify the destruction of a substantial part of an ancient Woodland, which could be avoided by using alternative design options; such as bus priority lights – which are utilised elsewhere on the same route.

We stress that the impacted area is at the very end of the CBC, where its value is least, and there is no bus lane whatsoever on Grange Road past the junction with Nutgrove Avenue. There is absolutely no space for an outbound bus lane on Nutgrove Avenue. (There is currently an inbound bus lane running past the Park).

We also stress the need to maintain and preserve the limited natural woodland habitat spaces in the area, and note that the combination of permanent and temporary land takes to facilitate the proposal would result in a disproportionately devastating impact on this Woodland area. The noise and vibrations of the piling and rock-breaking work would wreak havoc on the breeding population of protected species living in the Park.

Rathfarnham Village and its surrounds trace their history back hundreds of years, in particular Rathfarnham Castle, and it is not possible to retrofit modern designs into such an historic setting without thorough consideration. Accordingly we emphasise the need for ABP to objectively assess this proposal in the context of this historic setting and to adopt a sensitive and proportionate stance; especially in light of the range of alternative traffic management solutions which are already deployed elsewhere on this very route. It is clear that the NTA has not from the outset appreciated

the significance of the Park, and that this attitude persists now, as can be seen from the Response documents.

We are aware of a widely held local view that the bus corridor should instead terminate at the end of the Rathfarnham Village bypass (by the Butterfield Avenue junction) and we wholeheartedly agree with this approach. A signal controlled priority light could give priority to outbound buses passing the Park. (There is already an inbound bus lane running alongside the Park). It would destroy the Woodland area for it to be built over as proposed.

### ***Importance of the Park to the Local Community and the Environment***

The current proposals will cause very substantial, permanent harm to a large section of the Woodland of Rathfarnham Castle Park, which is a vital amenity for the entire area. We live within walking distance of the Park and visit it regularly with our family. We are aware of many autistic and neurodiverse children who also love this area in particular. There is a wide range of wildlife there which is wonderful for children to see, especially unusual wild birds, plenty of frogs and lots of squirrels. We do not see such a wide variety of wildlife in such a compact area in other local parks.

The Park is very small, and is effectively entirely encompassed within 250m of the boundary wall where the bus corridor will run. This means that the entirety of the Park will be subject to extreme negative impacts arising from piling, rock-breaking etc. The environmental assessments themselves admit that the noise from the proposed construction works will have a very significant impact on wildlife "within 250m" of the works; this means that in reality all of the wildlife in the Park, including breeding protected species, will experience extreme upheaval and distress. In all likelihood, the Park will cease to be a habitat for wildlife. This cannot be allowed to happen. Currently, the Park is like a mini nature reserve, with tufted ducks, various protected species of wintering birds, a kingfisher, a heron, bats, frogs, etc. It has provided a surprisingly fertile breeding location for many of these species, especially last year. This should be allowed to continue, not destroyed by extensive and lengthy construction activities.

We are very disappointed to see the dismissive attitude taken by the NTA regarding the concerns raised in respect of a local river, the Glin, which runs through the Woodland and will run under the proposed bus corridor in two locations. There was originally no awareness or understanding from the NTA that it was even there, let alone its significance from an environmental or hydrological perspective. It appears that the NTA finally looked at the river in October, yet its importance as a vital component of the biodiversity in the Park still seems to be entirely unappreciated.

The Woodland contains a very large number of mature trees, bushes and vegetation which give it a wonderful peaceful atmosphere in which children can play. The trees absorb carbon, pollution and noise. Given our concerns regarding climate change, it makes absolutely no sense to destroy a significant part of one of the limited natural play spaces in the locality for road widening purposes.

All international developments are prioritising the restoration and encouragement of nature, especially in urban areas where it is particularly precious. Actively removing a wildlife habitat and damaging an ecosystem would run entirely counter to this. At least a quarter of all of the trees set to be lost on this corridor, and more likely half of them, are situated in this one small woodland area. (The arboricultural assessment only looks at a limited selection of trees, whereas this is a woodland with many smaller trees, bushes, wild flowers, undergrowth etc, all of which were disregarded.) The corollary of this is that this massive quantity of trees, bushes, undergrowth etc can be saved if the

Woodland is spared. SDCC have also raised doubts regarding the accuracy of the tree surveys carried out by the NTA and have raised the issue of the disparity in ground levels inside and outside the Park, which would greatly impact on attempts to save "retained" trees.

### ***Road Layout; Excessive Land Take Proposed***

We also note that the NTA have not provided proper answers to our other objections, including the excessive amount of land sought (up to 10 metres in width). The existing road is over 15 metres wide as it runs beside the Park. There is absolutely no need for a further 10 metres in a residential area and opposite the entrance to a school. Even if the NTA's own measurements for the various road spaces are considered, these (GT x 2; bus lane x 2; pedestrian and cycling facilities) sum to 20m. Even allowing for a 3m temporary construction area, this still means that the area sought is excessive to the extent of 2m.

We also note the NTA contention that the reason for not terminating the bus corridor at the Rathfarnham Village by-pass is due to the fact that the S6, A2 and A4 will all run along that stretch of road. However this does not take into account the fact that a large quantity of general traffic turns off at the Butterfield Avenue and Willbrook Road junctions. There is substantially less traffic running alongside the Park than there is at the Rathfarnham Village by-pass.

Given that the park is situated right at the end of the bus corridor, and given that the adjoining roads do not offer scope for a continuing bus corridor, it makes absolutely no sense to destroy such a large amount of woodland for the sake of 450 metres. Particularly when it is clear from the above that the only improvement really needed 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 >15m roadway is adequate.

### ***Conclusion***

The proposed substantial intrusion into the Woodland area of Rathfarnham Castle Park is excessive and entirely unnecessary. Once outbound buses are prioritised with a signal controlled priority light at Butterfield Avenue, the remainder of the >15m roadway is sufficient for the inbound bus lane, two general traffic lanes and pedestrian and cycling facilities. Given the climate crisis, unnecessarily destroying up to 10 metres of a peaceful woodland habitat and important hydrological resource would be unconscionable. The NTA have from the outset failed to understand the importance of this wonderful resource, and their Response documents make it clear that this continues to be the case.

Again, our view is that the bus corridor should terminate at the end of the Rathfarnham Village bypass (by the Butterfield Avenue junction). A signal controlled priority light would provide sufficient priority for the limited number of outbound buses which pass the Park. (There is already an inbound bus lane running alongside the Park). It is entirely unnecessary and would be disastrous from an environmental perspective for the Woodland area to be sacrificed, as is proposed.

Yours faithfully,



Daria Sochacka and William McElinn.