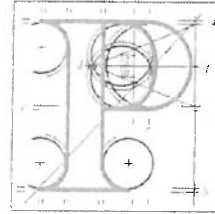


**Our Case Number:** ABP-316272-23



**An  
Bord  
Pleanála**

Denis O'Connell  
56 Galtymore Close  
Drimnagh  
Dublin 12

**Date:** 24 April 2024

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

Dear Sir / Madam,

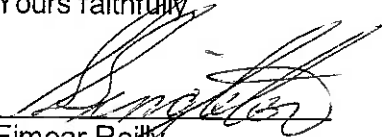
An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

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

*PP*  
  
Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02A

**Teil  
Glaó Áitiúil  
Facs  
Láithreán Gréasáin  
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64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublín 1  
D01 V902

56 Galtymore Close  
Drimmagh  
Dublin 12

**AN BORD PLEANÁLA**

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

16<sup>th</sup> March 2024

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

Dear Sirs,

I wish to make a further submission regarding the proposed compulsory purchase of a substantial part of the Woodland area of Rathfarnham Castle Park. This is a diverse wildlife habitat and a vital amenity for many people, especially autistic children, for whom it is a calming, regulating environment. It has a wide range of wildlife, especially protected wild birds, bats, frogs, bees, ducks and squirrels. It is a calm, peaceful, natural play space with a wonderful Woodland Playground and my own children love it. We have been visiting the Woodland Playground for many years.

I entirely agree with the proposal that the bus corridor should terminate at the end of the Rathfarnham Village bypass (by the Butterfield Avenue junction). There is precedent for the shortening of proposed bus corridors in the Clongriffin Bus Corridor. There could 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, profound, irreparable harm would be caused to the Woodland area as a biodiverse wildlife habitat and peaceful natural haven for children, particularly autistic children.

It is clear from the NTA's Responses to the many objections raised in relation to the proposed taking of this particular woodland area (and the impact on the park of the construction activities) that they simply do not appreciate the significance of this particular place. The NTA has acknowledged that there will be substantial impacts on wildlife, breeding patterns etc, within 250m of the construction works. However essentially this entire Park is within 250m of the proposed construction site! It is a successful breeding habitat for many species, including a number of protected species. While the NTA has finally acknowledged this (see pg 93 of the Planning Response), they still appear to be unaware (or uncaring) of the inevitable impact of the proposed construction works on this entire beautiful local park.

Additionally, the NTA has admitted that they did not consider alternatives to taking part of the Park – see pg 442 of the Planning Response:

*“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's Woodland area from the numerous perspectives outlined by myself and many others, any reasonable alternatives such as taking land from the opposite side of the road should at least have been considered. While I would maintain that the existing road width is sufficient in any event (please see my original submission), it is quite incredible that this very basic level of due diligence was not undertaken. **As such, 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.**

Furthermore, the environmental assessments regarding the Park were entirely inadequate. The NTA has now admitted that the Park is a habitat for numerous protected species – see Pg 93 of the Planning Response:

*“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 again a grudging admission. In reality, the Park is a wonderful habitat for wild birds and wildlife, a small nature reserve in effect. It is a very successful breeding area especially for frogs, squirrels, tufted ducks, mallards and many other species. It should be valued as a peaceful wildlife habitat, not turned into a construction site.

The Woodland contains a very large amount of mature trees, bushes and undergrowth which give it a peaceful atmosphere in which children can play. The trees absorb carbon, pollution and noise. Given concerns regarding climate change, it makes absolutely no sense to destroy a significant part of one of the most valued natural woodland areas in the locality for road widening purposes.

As that the park is located right at the end of the bus corridor and the adjoining roads do not offer scope for a continuing bus corridor, it makes absolutely no sense to cut down 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 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 >15m roadway is adequate.

The NTA have suggested that a reason for retaining the bus corridor to the Nutgrove Avenue junction is that the S6, A2 and A4 will run along that stretch. However this does not take into account the fact that a large quantity of outbound general traffic turns off at both Butterfield Avenue and Willbrook Road. In reality, a far lesser quantity of traffic runs alongside the Park than is present at the Rathfarnham Village by-pass. (Note that there is an inbound bus lane already).

Essentially, there is a fundamental lack of understanding by the NTA of how important the Woodland area is not just to the local community in general but to the wider community of autistic and neurodiverse people. It is a peaceful, serene area, surrounded by trees and nature. It is also loved by young children as a natural play space, even apart from the Woodland Playground infrastructure. The Woodland area should be specifically considered under the DMRB Guidance as being of high sensitivity as it is effectively a nature reserve which is of high importance to vulnerable groups such as people with autism or neurodiverse people, and those with sensory needs.

However the NTA do not appear to understand the issues raised in submissions such as those by AsIAm – the National Autism Charity and Involve Autism. The NTA have only focused on road noise and the proposal to rebuild a c.3m tall wall around the remainder of the woodland area. However, in

reality, this area will be lost forever to these vulnerable groups as an area for enjoyment and sensory regulation. The current sense of being out in the country, encircled by trees, will be lost. The catastrophic impact of such lengthy, extensive construction works in this sensitive location mean that, even after the construction period is over, it will never be the same again. It will be lost to the autistic community forever.

The Lord Mayor of Dublin recently announced an initiative whereby Dublin is to become the world's first autism friendly capital city. If this is to be achieved, our autistic children need serene, peaceful, natural play spaces such as this wonderful Woodland. They should not be unnecessarily destroyed.

### **Conclusion**

The proposed taking of a substantial part of the Woodland area of Rathfarnham Castle Park is excessive and entirely unnecessary. The NTA have not appreciated the significance of this area, primarily in terms of being a very important breeding habitat for protected species and a vital calming environment for those with sensory needs. Destroying this beautiful natural area for no good reason would be unconscionable. The Clongriffin bus corridor provides a precedent for shortening a proposed bus corridor. That approach must be taken here also. Many thanks.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Denis O'Connell', written in a cursive style.

Denis O'Connell.