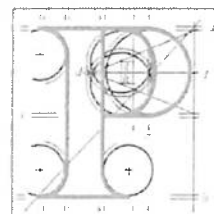


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Rathfarnham Castle Residents Association
c/o Joe Doddy
1 The Woodlands
Rathfarnham Castle
Dublin 14

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

Teil
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



Rathfarnham Castle Residents Association

Joe Doddy
Rathfarnham Castle Residents' Association

1 The Woodlands

Rathfarnham Castle

Dublin D14V2P8

087 2539311

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

AN BORD PLEANÁLA	
LDC- _____	_____
APP- _____	_____
25 MAR 2024	
Fee: € _____	Type: _____
Time: 12:35	By: Hand
12 March 2024	

316272 / 316377

BusConnects Templeogue / Rathfarnham to City Centre CBC
Impact on Rathfarnham Castle Park
Response to NTA documents

Dear Sirs,

We, the Rathfarnham Castle Residents Association (RCRA) committee, represent the residents of Castleside Drive, a quiet area immediately adjoining Rathfarnham Castle Park. We wish to take this opportunity to confirm our objection to the proposed compulsory acquisition of a large strip of the Woodland area of the Park, which is an extremely important amenity for the area.

The NTA response documents make it abundantly clear that the importance and value of the Woodland area, as well as the Park as a whole, are still entirely unappreciated by them. The Park is quite small in size but very valued in the local area. The Woodland is a quiet haven which contains a lovely playground. There is an immediately adjoining duck pond which is a habitat for numerous protected wintering birds. An open watercourse, the river, runs through the area.

The NTA have belatedly acknowledged the existence of this habitat, of which they had clearly previously been unaware. We note their admission 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." [NTA Planning Response pg 93]

We also note that:

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

As the Park is so small, construction work at the Woodland area will cause major upheaval throughout the Park, particularly in terms of noise and vibration from pile driving etc. This is likely to decimate the breeding populations of wildlife throughout the Park. It is accepted that this impact will be very significant within 250m of the construction site:

"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].

However, the duck pond is only around 60 – 70 metres from the current Park boundary. The entire Park is effectively located within 250m of the boundary wall. Therefore, the proposed works will have an extremely significant negative impact on the Park as a whole.

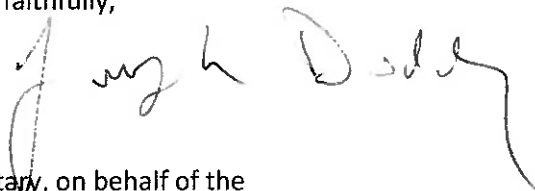
We agree with the Rathfarnham Wood Residents' Association proposed approach – that the bus corridor should instead be terminated at the Rathfarnham Village by-pass (at the junction with Butterfield Avenue). A signal controlled priority light at this location could give priority to outbound buses without incurring extremely high costs in monetary and environmental terms. The current, and correct, approach within the EU and elsewhere is to preserve and restore natural green areas. It is certainly not to cut down a vibrant woodland habitat, and to effectively destroy a breeding habitat of protected species, where a suitable alternative approach exists.

Again, the Park is a vital amenity for the area and local community and should be protected, not destroyed. Bus priority for outbound buses at this small stretch of road could instead be achieved by using bus priority signals. There is already an inbound bus lane. Please consider the extremely significant negative impacts on the entirety of Rathfarnham Castle Park, not just its Woodland, before proceeding with this proposal.

It appears to us that the transport benefits would be greatly outweighed by the cost and environmental impact.

Please acknowledge receipt of this submission.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Joseph D. Doherty". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Secretary, on behalf of the

Rathfarnham Castle Residents Association.