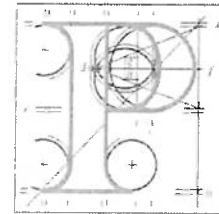


Our Case Number: ABP-316272-23



**An
Bord
Pleanála**

Thomas Sexton
9 Rathfarnham Wood
Rathfarnham
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,

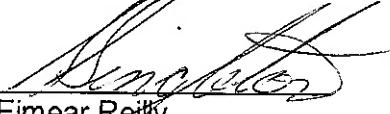
An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

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,

pp 
Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Thomas Sexton & Mary O'Mahony

9 Rathfarnham Wood

Rathfarnham

Dublin 14

316272/316377

An Bord Pleanála (Strategic Infrastructure Division)

64 Marlborough Street

Dublin 1

D01 V902

25th March 2024

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

Bus Connects Templeogue / Rathfarnham to City Centre CBC

Objection to proposed Compulsory Purchase Order - 9 Rathfarnham Wood,

Rathfarnham, Dublin 14

**Submission on (1) Planning Application in respect of and (2) Proposed CPO of
Woodland area of Rathfarnham Castle Park**

Dear Sirs,

I wish to make this further submission in response to the NTA Response Documents in relation to both matters listed above – refs ABP-316272 and ABP-316377.

1. Lack of proper consideration of options

Firstly, we are unhappy with the statement on page 247 of the CPO Response Document 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.”

Surely, given the importance of Rathfarnham Castle Park’s Woodland area as evidenced by the numerous perspectives outlined in the extensive Rathfarnham Wood Residents’ Association (RWRA) submission and many other submissions including my own, any reasonable alternatives such as taking land from the opposite side of the road should at least have been considered.

While we maintain that the existing road width is sufficient in any event, 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 seek to CPO both part of our garden and a large section of the Park was fundamentally flawed and should not be confirmed.

2. Importance of the Park not appreciated

There is a constant thread running through all of the NTA Responses of a lack of appreciation of the importance of the Woodland area and Rathfarnham Castle Park generally to the local community.

This is absolutely wrong. It is locally significant for a range of reasons – it is a diverse wildlife habitat, it is a home for numerous protected species, it contains an open watercourse which is a sensitive hydrological resource. It is also a highly valued natural play space for local autistic children, for whom it meets sensory needs which other play spaces do not. All of these issues have been extensively explained by RWRA, other local residents and groups, as well as the Autism advocacy groups AsIAm – the national autism charity and Involve Autism. Yet the NTA has apparently not taken any of this information on board.

Every effort should be made to minimise any impact on the Park and its Woodland, where an alternative approach is reasonably available. This approach is being taken in relation to other areas. For example, in relation to the suggestion of cyclists potentially sharing bus lanes, the NTA dismissively states that “there are specific reasons” (pg 247 of CPO Response) for this approach being taken in other locations. The NTA does not appear to understand that very substantial “specific reasons” are also present here. So many submissions have highlighted the central significance of the Woodland area of Rathfarnham Castle Park in the local area.

Here, the construction works will cause catastrophic environmental consequences throughout the entire Park, including the loss of a successful breeding habitat for many protected species. Also, a highly valued sensory space will be taken from the local autistic community. Accordingly, we would feel that this is precisely the type of situation which should be regarded as giving rise to “specific reasons” whereby it would be appropriate for cyclists to share bus lanes, to give one example.

3. Disproportionate impact of the CPO on our own back garden

Our house and my neighbours’ are unusual in that they back onto the Grange Road. It is proposed

That a very small section of our back garden is to be taken permanently for road widening works, and a further section temporarily. The level of disruption, inconvenience, noise and environmental impact to be caused by this is completely disproportionate to the extremely limited bit of land to be taken however.

In our case, we have a beautiful Beech tree at the end of our garden, which is around 100 years old and are in excellent condition. Our Beech tree will certainly be lost, should the works proceed, and it is very likely that other trees may be irreparably damaged also.

This tree is regularly maintained by our tree surgeon and has been for many years and it would be appalling from a climate change perspective to lose it.

4. Extending the bus corridor past the Park does not make sense

Rathfarnham Castle Park (and our garden) are situated at the very end of this bus corridor. Neither of the two roads onto which the buses will continue are capable of being widened. There is no material delay to the S6 or the current 16 arising from this particular 450m section of road. Even if there were, the presence of a bus lane would simply shift that minimal delay to the immediately following narrow sections of Grange Road (in respect of the proposed A2) and Nutgrove Avenue (in respect of the S6 and proposed A4). In practice, very few passengers alight at any stop between Butterfield Avenue and Nutgrove Avenue.

Also, the general outbound traffic naturally diverges both at the Butterfield Avenue and Willbrook Road junctions, so that substantially less outbound traffic actually passes the Park than travels along the Rathfarnham Village by-pass. This means that, although the outbound S6, A2 and A4 will continue to pass the Park, the amount of general traffic with which they will share the road will be far less than the traffic up to the Butterfield Avenue junction.

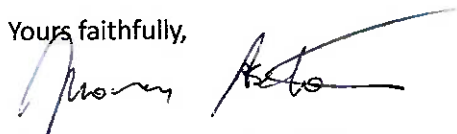
Therefore the NTA contention that this supports the rationale for the bus corridor being extended to the Nutgrove Avenue junction does not hold water [pg 88 of Planning Response]. In practice, the amount of traffic here is substantially less than at other outbound stretches along this corridor, which gives the opportunity to save the Woodland area. (I am only referring to outbound buses here as there is already an inbound bus lane passing the Park.)

Again, buses will not have any priority after the Nutgrove Avenue / Rathfarnham Wood junction in any event, as there is simply no space to widen the road or allow any other measures. Therefore the bus priority provided by this short stretch of bus corridor will be minimal and very short-lived in any event – the buses will simply merge with general traffic a short distance further on. There is

precedent in shortening a proposed bus corridor – the Clongriffin route.

It would be unconscionable to destroy so much woodland habitat, as well as our own beautiful Beech tree, for so minimal and transient a “benefit”, when alternative bus priority measures such as a bus priority light for outbound buses at Butterfield Avenue would give a similar result.

Yours faithfully,



Thomas Sexton & Mary O'Mahony

