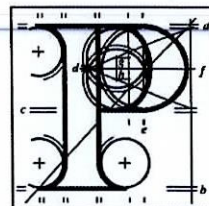


**Our Case Number:** ABP-313509-22



**An  
Bord  
Pleanála**

Rathgar Residents' Association  
c/o Peter Doyle Chairperson  
P.O Box 9574  
Dublin 6

**Date:** 13 July 2022

**Re:** BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme  
Co. Dublin

Dear Sir,

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. A receipt for the fee lodged is enclosed.

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

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

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

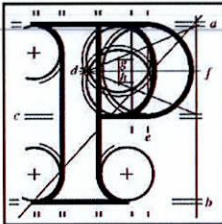
Yours faithfully,

Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

HA02A

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaio Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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



An  
Bord  
Pleanála

Ldg - 055174-22  
ABP - 313509-22  
**SID Online Observation**

**Online Reference: (SID-OBS-000096)**

### Online Observation Details

<b>Contact Name:</b>	Peter Doyle
<b>Lodgement Date:</b>	07/07/2022 08:07:17
<b>Case Number / Description:</b>	Busconnects Proposed Scheme, Belfield/Blackrock to City Centre Core Bus Corridor Scheme

### Payment Details

<b>Payment Method:</b>	Online Payment
<b>Cardholder Name:</b>	Peter Doyle
<b>Payment Amount:</b>	€50.00





**Rathgar**  
Residents' Association

P.O. Box 9574, Dublin 6.

6<sup>th</sup> July 2022.

**BY REGISTERED POST AND EMAIL TO: [sids@pleanala.ie](mailto:sids@pleanala.ie) & [communications@pleanala.ie](mailto:communications@pleanala.ie).**

**ABP Strategic Infrastructure Division,  
An Bord Pleanála,  
64, Marlborough Street,  
Dublin 1,  
D01 V902.**

**RE: Rathgar Residents Association Submission to An Bord Pleanála on the  
BUSCONNECTS PROPOSED SCHEME, BELFIELD/BLACKROCK TO CITY  
CENTRE CORE BUS CORRIDOR SCHEME.**

Dear Sir/Madam,

The Rathgar Residents Association fully supports improvements to Dublin's bicycle lanes and public transport network, in particular from an environmental perspective.

We strongly believe however that Dublin's environment, heritage and community should not be compromised by Busconnects, which - in its current form - at best promises to save commuters mere seconds off journey times. The price is too high for so little gain: heritage, trees and wildlife are threatened across Dublin.

Road-widening, which threatens the architectural layout of our streets is strongly opposed by the Rathgar Residents Association. Many of our smaller streets and their residents will suffer as a result of increased traffic flows and parking issues.

Many villages across Dublin are at risk of losing their identity due to the current Busconnects design which is still based on outdated and inexplicable road widening.

With regards to the Proposed Scheme, Belfield/Blackrock to City Centre Core Bus Corridor Scheme, the Rathgar Residents Association are especially concerned about the environmental impact of the scheme on many of Dublin's and the Greater Dublin Area's European sites of Environmental Interest which are valued as being of International Importance.



Rathgar is located upstream of the Proposed Scheme and will be hydrologically connected to the Proposed Scheme via the Dodder River. Any environmental risk affecting the River Dodder and its wildlife is of particular concern to the Rathgar Residents Association.

Of note, the Proposed Schemes Environmental Impact Assessment Report (EIAR) states in the Summary of Construction Phase Significant Residual Impacts that there will be Significant Residual Impact (Post Mitigation and Monitoring) on the Badger, Mixed Broadleaf Woodland and Scattered Trees and Parkland, some breeding bird species (non-SCI) and also some wintering bird species (non-SCI).

Further to this, the Summary of Operational Phase Significant Residual Impacts states that there will be Significant Residual Impact (Post Mitigation and Monitoring) on the Grand Canal which is a proposed Natural Heritage Areas (pNHAs) of National Importance. This includes Habitat Degradation (hydrology; air quality; non-native invasive plant species) which will result in a 'Likely significant effect at the local geographic scale for air quality;'

The Rathgar Residents Association believes that a comprehensive underground metro would allow Dublin's residents, commuters and visitors to access the city and its environs whilst saving Dublin's environment, built heritage and special character.

As a short-term solution there are many changes that could be made to make the current bus system more efficient at no cost to community and villages. These include policies aimed at reducing private cars on our roads for example implementing congestion charges and comprehensive park and ride facilities and also introducing, without delay, measures to improve bus journey times for example by introducing priority bus lights and cashless fare on buses.

The Rathgar Residents Association believes that all non-invasive improvements should be made before any irreversible and detrimental changes are made to our villages, streets and the environment of Dublin and the Greater Dublin Area.

**The Proposed Schemes Environmental Impact Assessment Report (EIAR) states:**

**'12.3.4 Designated Areas for Nature Conservation**

**12.3.4.1 European sites**

The Proposed Scheme will run alongside South Dublin Bay and River Tolka Estuary SPA at Booterstown Marsh on Rock Road and at South Dublin Bay SAC at Merrion Gates.

There are eight European sites located in Dublin Bay which are downstream of the Proposed Scheme: South Dublin Bay SAC, North Dublin Bay SAC, Howth Head SAC, Rockabill to Dalkey Island SAC, Dalkey Islands SPA, Howth Head Coast SPA, North Bull Island SPA, South Dublin Bay and River Tolka SPA.



European sites will be hydrologically connected to the Proposed Scheme via the Dodder\_050, Grand Canal, the Liffey Estuary Lower, the Brewery Stream\_010, and Booterstown Marsh and Nutley Stream.

In addition, Wicklow Mountains SAC is located upstream of the Proposed Scheme and will be hydrologically connected to the Proposed Scheme via the Dodder\_050.'

'It is confirmed that, for the purposes of the EIAR, these European sites are all valued as being of International Importance. '

### **The Proposed Schemes Environmental Impact Assessment Report (EIAR):**

#### **Table 12.16: Summary of Construction Phase Significant Residual Impacts**

##### **Significant Residual Impact (Post Mitigation and Monitoring)**

###### **'Badger**

Local Importance (Higher Value)

Disturbance / Displacement

Likely significant effect at the local geographic scale'

###### **'(Mixed) broadleaved woodland (WD1);**

Local Importance (Higher Value)

Habitat loss

Likely significant effect at the local geographic scale'

###### **'Scattered trees and parkland (WD5)**

Local Importance (Higher Value)

Habitat loss

Likely significant effect at the local geographic scale'

###### **'All other breeding bird species (non-SCI)**

Local Importance (Higher Value)

Habitat Loss; Mortality risk; Disturbance / Displacement; Habitat Degradation (hydrology)

Likely significant effect at the local geographic scale (Habitat Loss; Mortality risk; Disturbance / Displacement);  
No significant residual effect (Habitat Degradation (hydrology))'

**'All other wintering bird species (non-SCI)**

Local Importance (Higher Value)

Habitat Loss; Mortality risk; Disturbance / Displacement; Habitat Degradation (hydrology)

Likely significant effect at the local geographic scale (Habitat Loss; Mortality risk; Disturbance / Displacement);  
No significant residual effect (Habitat Degradation (hydrology))'

**Table 12.17: Summary of Operational Phase Significant Residual Impacts**

**Significant Residual Impact (Post Mitigation and Monitoring)**

**'The Grand Canal pNHA**

National Importance

Habitat Degradation (hydrology; air quality; non-native invasive plant species)

Likely significant effect at the local geographic scale for air quality;  
No significant residual effect arising for other potential impacts'

'While unlikely, in a worst-case scenario, a potential air quality effect at the Grand Canal pNHA, namely Leeson Bridge, could occur as result of the operation of the Proposed Scheme. However, it is expected that by 2043 the existing background pollution concentrations will reduce to negligible levels, due to a significant reduction in emissions between 2028 and 2043 from advancement in engine technology and the addition of a higher percentage of electric vehicles to the fleet. Therefore, localised impacts by the Grand Canal, namely at Leeson Bridge, are therefore considered to be significant at a local scale only.'

Please find enclosed herewith cheque in the amount of €50 for this submission.

Yours faithfully,



**Peter Doyle,**

**Chairperson,  
Rathgar Residents Association.**