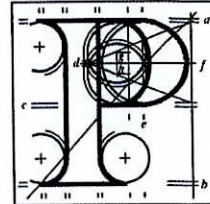


Our Case Number: ABP-316828-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Tallaght Community Council c/o Gerard Stockil
52 Bancroft Park
Tallaght
Dublin 24

Date: 19 July 2023

Re: Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.
Tallaght/Clondalkin to Dublin City.

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 accept this letter as a receipt for the fee of €50 that you have paid.

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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA02A

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64 Marlborough Street
Dublin 1
D01 V902



An Bord Pleanála

SID Online Observation

Online Reference
SID-OBS-000949

Online Observation Details

Contact Name
Gerard Stockil

Lodgement Date
04/07/2023 10:52:41

Case Number / Description
317070

Payment Details

Payment Method
Online Payment

Cardholder Name
Pauline Stockil

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

Yes No

Request Emailed to Senior Executive Officer for Approval

Yes No

Signed

EO

Date

Finance Section

Payment Reference

ch_3NQ5uXB1CW0EN5FC0eucW2yj

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

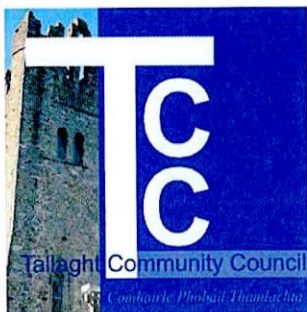
SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date



RCN 20012335

Address for this correspondence

Gerard Stockil
52 Bancroft Pk
Tallaght
D24
085 7551005

4th July 2023

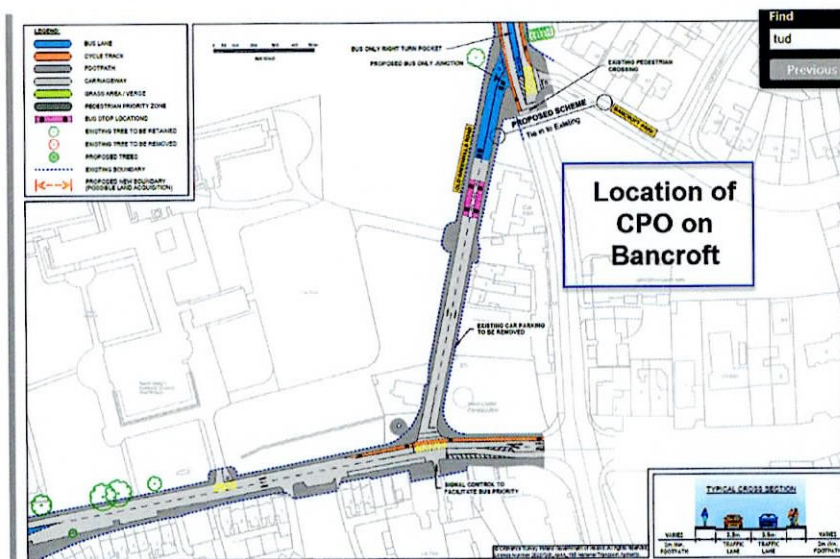
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[KA29Nd317070Tall_BussCorriRoute_CompoundCPO](#)

Bord Pleanála Case reference: KA29N.317070

Tallaght / Clondalkin to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2023

1007(07).2f	Area (Ha): Area (m2): Description: County: Address:	0.30433 3043.3 Recreational Dublin Green Area at Bancroft Park , Greenhills Road, Dublin 24	South Dublin County Council, County Hall, Tallaght, Dublin 24, D24A3XC	None	Owner(s)
1007(12).2f	Area (Ha):	0.06759	South Dublin County Council,	None	Owner(s)



CHY 6563. Registered Charity Number (RCN): 20012335

Dear Bord Pleanála

Tallaght Community Council are lodging an objection to the latest Bus Connect preferred routes through Tallaght village and the CPO of a compound on Bancroft Park, both are interrelated..

Support Bancroft Residents Association object to use of Bancroft Green as a compound

We are supporting the Bancroft Residents Association objection to the use of Bancroft green as a compound for Bus Connect. We congratulate all in the Residents Association involved in making the submission and informing the residents. There is no need to take this community space given the other options in the immediate area. Alternative options are discussed in the Residents Association objection. In addition the TU Dublin Campus could act as a depot avoided many of the problems with the Bancroft Green site.

Objection to Tallaght to Ballymount route via Tallaght village

We are lodging this objection, which is also supported by the Tallaght village residents listed below,

Vivienne Peggs, 59 Watergate, born Main Rd.

Joe Peggs, Newtown.

Deirdre Peggs, 3 Main St.

David and Paula Nugent, Main St.

Paul Kelly, 5 Main St.

John Kenny, Main St.

Margaret Reardon, Main St.

Thecla Costello, "Hostello", Old Greenhills Rd.

Paul Byrne, 16 Bancroft Park.

Linda and Tony Donoghue Main Road

TCC made a past submission in December 2020, outlining our objection to removing a community plaza space, 8 mature trees and all 20 on-street residents parking spaces, including a disabled space to create a bus only "plug" on the Old Greenhills Rd.

Bus Connect 2023 - the report and outlined preferred routes

Our objection rationale remains consistent as in 2020, the wider community losses (of public amenity space, residents on street parking and cúl de sac status) is not justified by the outlined “gains” for bus travel.

The grounds for objection are listed below

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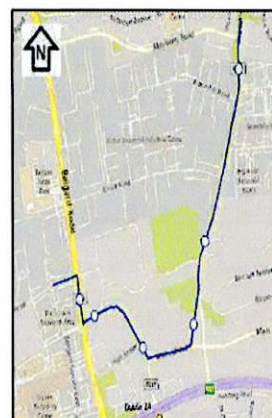
11. We Think the Scoring system fails to take into account the disadvantages of BG2 and the advantages of BG5, and we think that consideration of the campus as tax payer funded operation has been given undue consideration. 17

1. Bus Connect Analysis shows the village is NOT the best route.

BG1 and BG5 routes propose this dramatic alteration in the village layout, opening the cúl de sac and sacrificing the largest village public plaza plus over 20 parking spaces to create a very short bus lane that “gains very little in distance and time strategically.”



BG2 Through TU Dublin



BG5 (Town Centre, Via Belgard Square East)

Table 6-1: Revised Options Assessment Section 1

Assessment Criteria	BG1	BG2	BG3	BG4	BG5
Economy	Red	Green	Green	Green	Red
Integration	Green	Orange	Red	Red	Green
Accessibility & Social Inclusion	Green	Green	Red	Orange	Green
Safety	Yellow	Yellow	Yellow	Yellow	Yellow
Environment	Orange	Green	Green	Red	Green
Overall Rating	Green	Green	Orange	Red	Green

2. Loss of largest communal village plaza



Figure 1 Plaza at Old Greenhills Rd used for community events.

Tallaght village has very little publicly owned open space to allow events, gathering, socialising.



Figure 2 Plaza at Old Greenhills Rd will be removed.

SDCC created 3 x pocket plaza in a series of Part 8s.

The Old Greenhills Rd Plaza is the largest of these, it is also the most protected from dangerous traffic.

Name of Plaza	Area m ²	% Area
---------------	---------------------	--------

1	Greenhills Plaza	355	39%
2	Victors Plaza	347	38%
3	Katharine Tynan Plaza	215	23%
Total		917	

Removing the Greenhills Plaza will reduce village plaza amenity space by 39%, it will also damage the visual amenity of the area, and instead of one busy Rd (The New Greenhills Rd), will result in two The New Greenhills Rd and the Old Greenhills Rd. One of the reason for the New Greenhills Rd was to reduce traffic in the village, this proposal in counterproductive.

Bus Connect is proposing to permanently remove the largest at the end of the Old Greenhills Rd.

This plaza plays a pivotal role in public village festivals, such as Talafest. Creating a reasonable, safe place to enjoy outdoor activities.

3. Loss of cúl de sac in the village

All the properties have enjoyed a low traffic environment for many years.

Some cottages rely upon the on-street parking as their only source of personal and visitor parking and for home deliveries.

Opening this cup de sac will dramatically alter their daily lives. Their properties will no longer be on a cúl de sac, but now a high frequency bus lane with 2 bus stops.



Figure 3 Cul de sac , a key source of visual amenity and tranquillity in a built up area.

This cúl de sac is the site of family events in Tallaght village as the only public cúl de sac in the village.



Figure 4 Largest Plaza will be removed, removing a safe area for public events.

The small garden with the Dancers statue at the top of this cúl de sac is the site of the village Christmas Tree, where residents celebrate Christmas safely outdoors each year.



Figure 5 Christmas Tree Lighting Ceremony is safe as Bus Traffic is currently controlled.

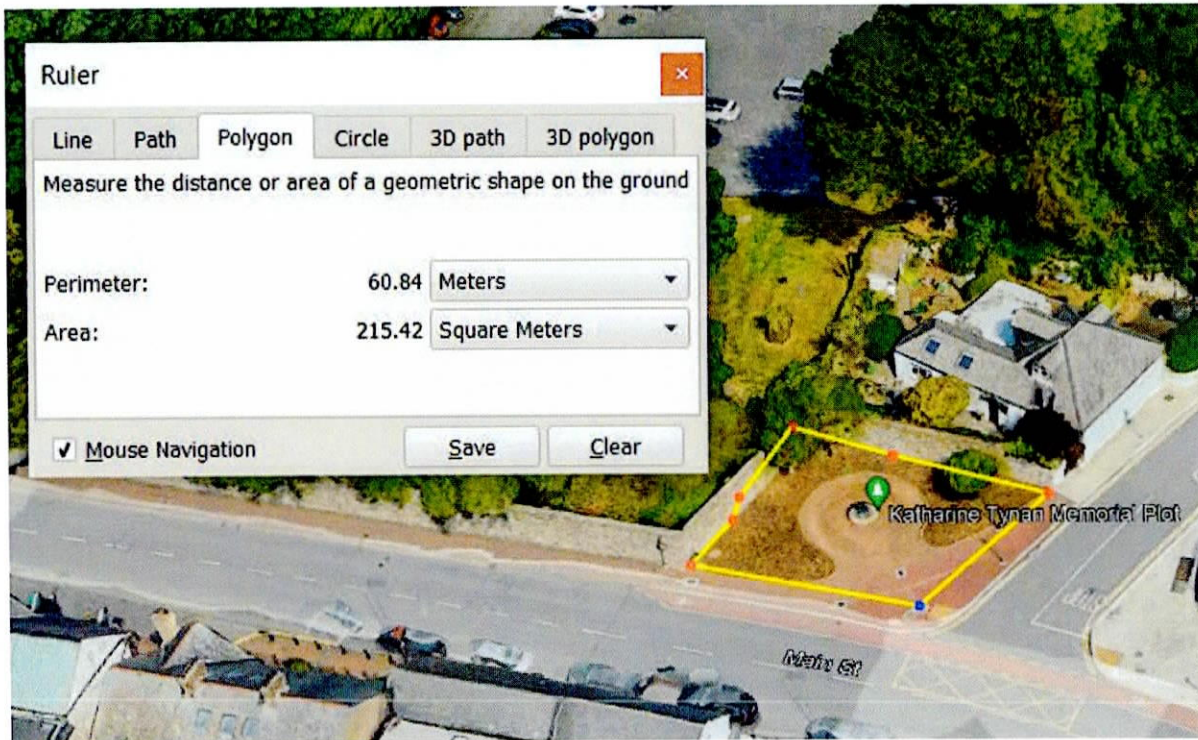


Figure 6 Plaza area becomes less safe if busses on both sided.

This will be practically impossible with buses turning left on Main St into the Old Greenhills Rd.

This will deprive the community of an established community event every year.

This runs contrary to the local area plan for Tallaght Town Centre, it removes the intimate scale and character of the village. The following is a extract form the Tallaght Town Centre Local Area Plan., on the left are objectives which are clearly contravened , and on the right is one reason why they are contravened.

3.4 The Village

Consolidate existing mixed use residential neighbourhood within a high quality place of intimate scale and character.	The development will remove intimate scale and character.
-----------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------

<p>Key Objectives for the Village (VL):</p> <p>VL6: Protect and enhance setting of protected structures and qualities of the ACA.</p>	<p>The ACA protected structures will be less protected in increased bus traffic flows in the village.</p>
<p>VL2: Develop the tourism potential of the historic Village in accordance with a Tourism Strategy for the area, including a heritage trail and potential community and cultural attractions.</p>	<p>An unnecessary bus lane is not a “cultural attraction”, and cul-de-sac which allows visual amenity and community activity is. Tourists come to see nice cúl de sac, with historic walls, trees, old building and a sense if space, not buses, there is already a bus land in the New Greenhills Rd and the TU Dublin campus solution is far superior. –</p>

It also contravenes G16 Objective 1 in the County Development Plan

G16 Objective 1:

To support a hierarchy of accessible open spaces and recreational facilities, appropriate for neighbourhood size and catchment area, which are adaptable and capable of accommodating multiple uses (See Chapter 8: *Community and Open Space*).

Reducing the Open Plaz area by 39% is a very retrograde step for no demonstrable gain.

It is also a contravention of

G17 Objective 2:

To protect and enhance the landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, in accordance with the provisions of South Dublin’s Landscape Character Assessment and the provisions of Chapter 3: *Natural, Cultural and Built Heritage* of this Development Plan.

The visual amenity of the village will be severely degraded if the cul-de-sac is opened, it.

The cul-de-sac promotes walking, due to its visual amenity, and walking promotes health, and conforms with

Regional Policy Objective 9.10 of the RSES states *'In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.*

Removing the cul the sac will reduce health and well being.

4. Loss of 20 onstreet car parking space (1 disabled space)

Residents rely on these for their sole source of secure parking for themselves and visitors. Nearby offices and businesses (some high turn over e.g. barbers, suit hire) also rely on these adjacent spaces for their commercial viability. This Bus Connect proposal undermines the residents and businesses access to reliable, cost effective parking.

5. Failure to adequately explore TU Dublin Tallaght option

The Bus Connect report fails to include any real detail on why this route (only route with NO red scores) is not being explored further.

This TU Dublin Tallaght option is the best in the analysis and means no community losses of amenity space or residents parking.

TU Dublin Tallaght has a busy part time study programme.

These classes run until 10.00 pm nightly Monday to Friday , so the campus is already open until 10 pm. The cost of keeping it open longer will be offset by keeping the integrity of the village and the opportunity of easier access to a seat of higher learning.

Facilitating a bus lane through the campus connect Belgard Rd to Greenhills Rd below Bancroft would not involve a massive change in campus opening times.

As in UCD campus, it works successfully elsewhere in Dublin. It could in fact enhance the vitality of the university campus and improve public transport links to it.

The university campus is publicly owned land, and the university is tax payer funded.

This route is obviously the best option. We strongly challenge the lack of detail and effort pursuing this option.

6. Tidy Towns strategic plans for this plaza

Tallaght village Tidy Towns have been reinvigorating Tallaght Main Street, Old Bawn Rd and Greenhills Rd plazas since 2022. This has involved celebrating Street Fest in one of the 3 community plazas in Tallaght village in 2023.

The cúl de sac and plaza are used for community festivals - Tallafest, Christmas tree lighting ceremony and other performances.

See photos.

Bus Connect positions the loss of the largest of the 3 public plazas in Tallaght village as "impacting 5 properties". This is a massive understatement.

The loss of this public plaza will impact negatively on the community ability to socialise in Tallaght village in a meaningful way.

As part of the community regeneration of Tallaght village, public spaces are very limited and will be precious assets as the village lacks a public market square or village green in its geography, so the 3 plazas we have are valuable community assets for multi organised and informal community use for events, gathering and playing.

The 3 x plazas in Tallaght village are needed as communal areas for residents to use, particularly those in the hundreds of apartments who only have small balconies of outdoor space available to them.

The plaza on the Old Greenhills Road is one the Tidy Towns group wish to develop it to enable more communal uses as it benefits from day long sunshine, making it comfortable to use.

These community plans include public art, seating, more landscaping to support use by the school kids of St Marys to/from schools, parents dropping / collecting children from school, apartment dwellers in Greenhills court, and students from Priory Youthreach plus the wider village community.

7. Loss of Trees if opening Old Greenhills Rd is implemented

This route via the cúl de sac in Tallaght village will result in the direct loss of 9 trees of character.

This is not acceptable or in line with the SDCC Living with Trees policy.

Policy: The Council will engage with the general public, schools, resident groups and environmental non-governmental organisations to promote a better understanding of the management, care and value of trees and to increase public awareness of their importance in promoting well-being, environmental sustainability and improving quality of life.

The trees on the Plaza are relatively new but are a significant plus for the village. It is not sensible to remove these for no real gain. It contradicts G15 Objective 3 in the County Development Plan

G15 Objective 3:

Support the implementation of a co-ordinated regional approach to the maintenance of trees and support the work of the Regional Steering Group on Tree Management to which South Dublin County Council is a participant

This is not adequately scored on the route analysis under environmental. There is also no mention of the present (and protected) heronry in The Priory, adjacent to the Old Greenhills Rd.

There is no impact assessment on the bat habitat in The Priory lands, also adjacent to the Old Greenhills Rd.

8. Protected structures - The Priory Walls, ACA

The Priory walls are protected. These are not included in the analysis.

What impact assessment has been conducted on the introduction of vibrations from bus journeys on the protected stone structures by Bus Connect ?

What impact assessment on the ACA area has been carried out by Bus Connect in their route analysis ?

9. Traffic Jams During Funerals.

There are often large funerals at St Mary's Priory. One entrance to the car park is on the Old Greenhills Rd. If a new bus corridor is placed here it will cause massive congestion for large funerals. One of the reasons for the New Greenhills Rd was to reduce congestion in the village, this has been achieved, rerouting buses through a cul-de-sac is a retrograde step if a much superior route is available on the TU Dublin campus.

10. The strategic vacant site on Main St at junction with Greenhills Rd - not outlined in the route analysis

This vacant site is not "under construction" as labelled in the Bus Connect report, it is effectively derelict and has been for over ten years.

Lack of bus lanes through this section would affect reliability of services running along it



Figure 7 Large unused space in Village. It is NOT being built on.

This site has not been assessed as an option in Bus Connect - missing a win-win option for travel, community and a long term vacant strategic brownfield site in the County Town of SDCC.

This site has been left by the owners since the late 1990s. There have been no successful applications for development for this site since 2006. It is an awkward site for residential use, but could provide another route option for Bus Connect.

This site could allow Bus Connect create a bus only plaza, avoiding the main traffic lights.

It could carry two bus lanes, two bus stops and even create a parklet around the lanes and bus stops.

This positive land use would also solve the issue of a long term vacant site on Main St Tallaght village.

11. We Think the Scoring system fails to take into account the disadvantages of BG2 and the advantages of BG5, and we think that consideration of the campus as tax payer funded operation has been given undue consideration.

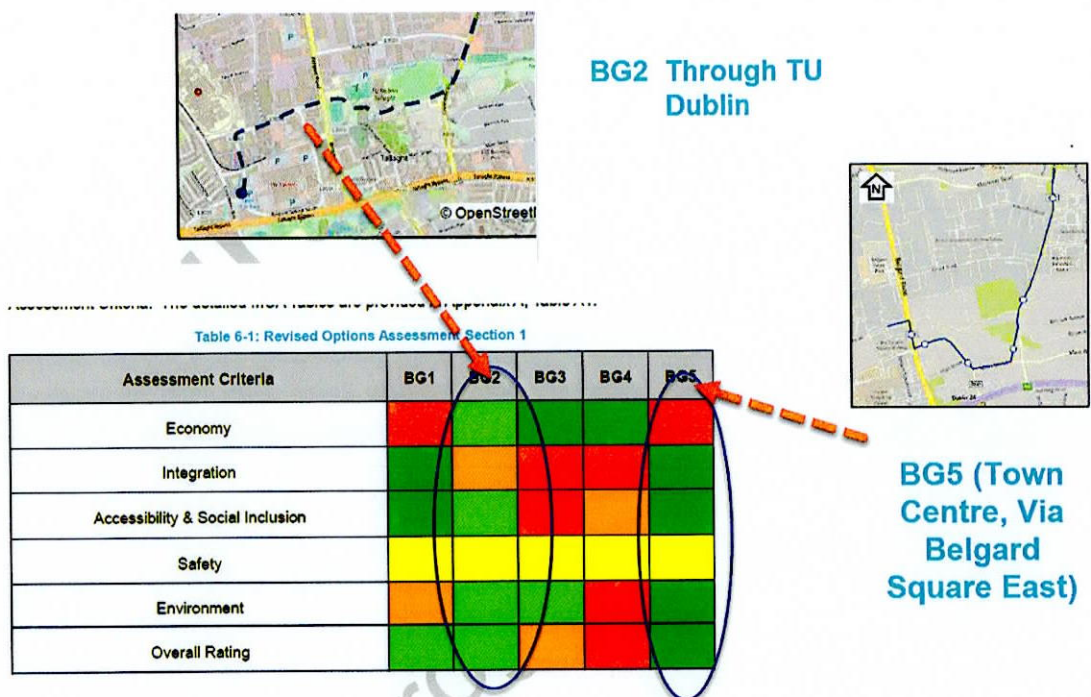


Figure 8 Scoring System of BG2 and BG5

We refer to the document

09-draft-preferred-route-options-report.pdf



Assessment Ranking	Description
Dark Green	Significant advantages over the other options
Light Green	Some advantages over the other options
Yellow	Neutral compared to other options
Orange	Some disadvantages over other options
Red	Significant disadvantages compared to other options

Figure 9 Scoring System

In the analysis are five options, two are close in rating, BG2 (TU Dublin Campus) and BG5 (Village), and the moment BG5 (Village) is the winner. We feel the ratings do not take all factors into account

The scoring system for the 5 options fails to take into account a serve disadvantage of BG5 compared to BG2. On page 55

For the TU Dublin route it states,

*As a result, this route option is considered to have **good** journey time reliability.*

Compared to BG5 (which is the preferred option in the repot)

Lack of bus lanes through this section would affect reliability of services running along it.

Surely the key measurement of a transport system is its reliability, BG5 should be penalised for this. BG2 is superior on the most important metric.

We disagree with the analysis of Land Use Integration

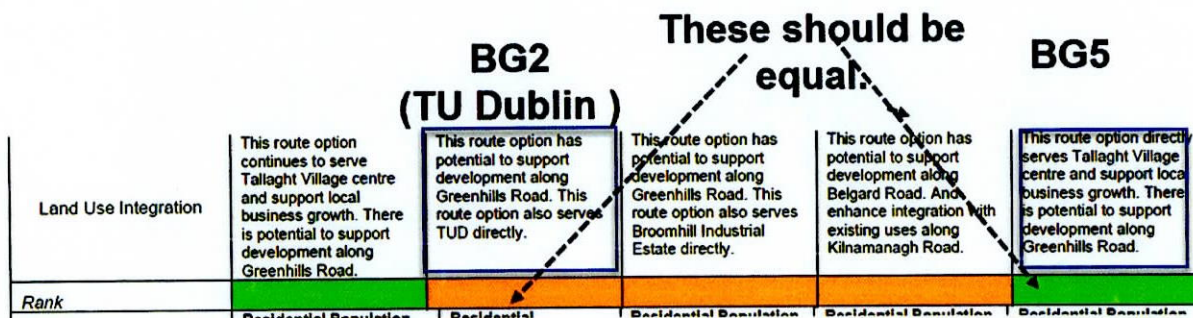


Figure 10 Scoring System does not take account of all facts know to people with local knowledge.

While the route goes through the village Main Street there is no bus stop on the Main St. The village is served by bus stops at the New Greenhills Rd and the Old Blessington Rd The TU Dublin solution would have a bus stop that is accessible via the Maelruain's entrance to the village, we feel that both ratings should be the same.

IN the Key Trip Attractors, both routes give access to TU Dublin campus, however the TU Dublin Campus route would give the most direct access possible, and would allow many more students and staff to avail of public transport, hence reducing CO2 emissions. They would do so on a route that is the most reliable of all. We feel that is has been stress and feel that both solution should **get the same rating.**

A key thing which we feel in not correct is the statement in section 5.3.2

The route option through TUD, is now considered unsuitable in the context of the restrictions on vehicle movements through the campus at certain times of the day and the significant realignment of the existing roads within the campus that would be required to facilitate high frequency bus movements.

As has been discussed elsewhere the college is a publicly funded body. It is strategic plan it ais to be a powerhouse for sustainability. (<https://www.tudublin.ie/explore/about-the-university/strategicintnt/2030/#planet>)

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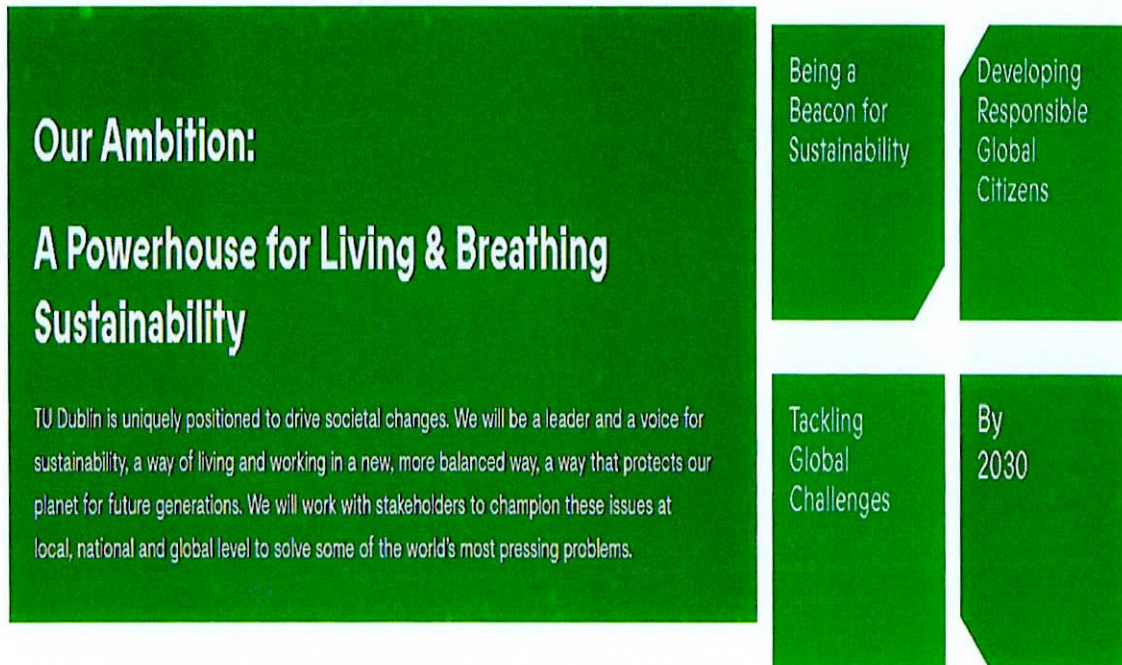


Figure 11 TU Dublin Strategic Intent , Beacon of Sustainability

Now we welcome TU Dublin ambition to solve local problems, a bus solution through the university campus is by far the most sustainable in terms of reduced CO2 emissions, protecting historical heritage, and most importantly getting people from A to B more reliably and quickly. We as An Bord to accept these proposals and recommend that the TU Dublin is by far the best solution

Le meas,

Roderick Smyth,

Volunteer Chair 2023/24

Gerard Stockil

Volunteer Secretary 2023/24

Tallaght Community Council

