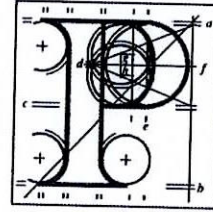


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Adrian Young and Nicole Byrne
Woodview Cottages
Rathfarnham

Date: 15 August 2023

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 (including your fee of €50) 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 the mean time, 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

HA02

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Submission Reference:

CASE HA29N.316272

Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

Submitted by:

Adrian Young & Nicole Byrne
Woodview Cottages
Rathfarnham

The observation is being made in objection to the location of Construction Compound TR3 Dodder View Road (Fig 1.0 - Image 5.3 from the [Chapter 5 Construction](#)), herein referred to as Site TR3, TR3, Compound, Site) as part of the Templeogue to Rathfarnham Bus Connects Scheme and the Compulsory Purchase Orders of the lands referenced 1004(1).2f as part of the [Compulsory Purchase Orders and Schedule](#). In summary, the site is unsuitable to be used as a construction site for a minimum of 24 months and has been inappropriately selected as the primary construction compound for the Templeogue / Rathfarnham Corridor due to:

- its location directly beside a residential area (within 10m)
- Its location on an Architectural Conservation Area
- the destruction of a green space amenity and community needs and;
- the availability of other more suitable sites in the vicinity

on the grounds of:

- selection criteria
- noise and vibrations
- environmental and air quality pollution
- visual aspects
- unacceptable hazard
- drainage (Greater Dublin Drainage Strategy)
- construction hours of work
- non compliance with Planning and Development Act 2000
- ecological destruction
- Dodder Greenway amenity
- undetermined end period to the use of a 'temporary' site and;
- unsuitable parking.

Construction Compound TR3 will be located along Dodder View Road, across the road from Bushy Park, in the greenfield area between Dodder View Road, Woodview Cottages and Church Lane, as shown in Image 5.3. The area of Construction Compound TR3 is approximately 5,120m².

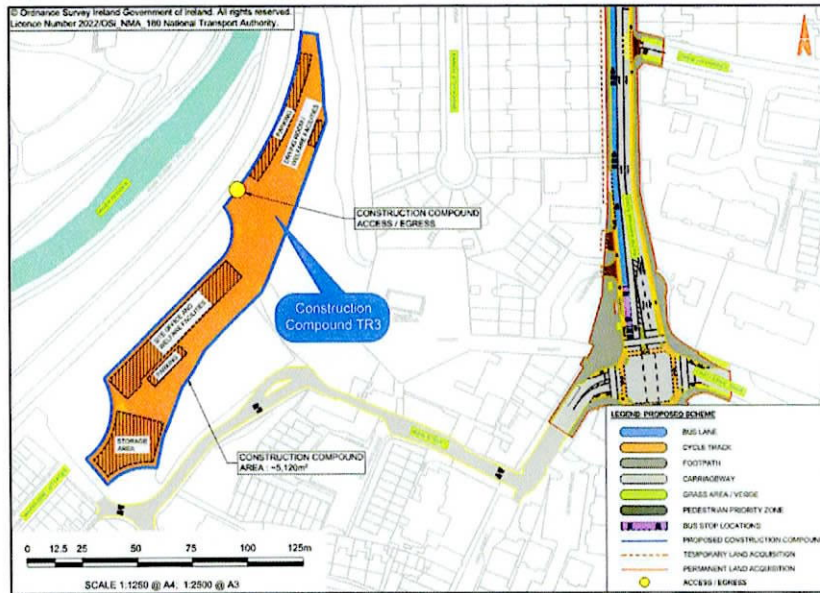
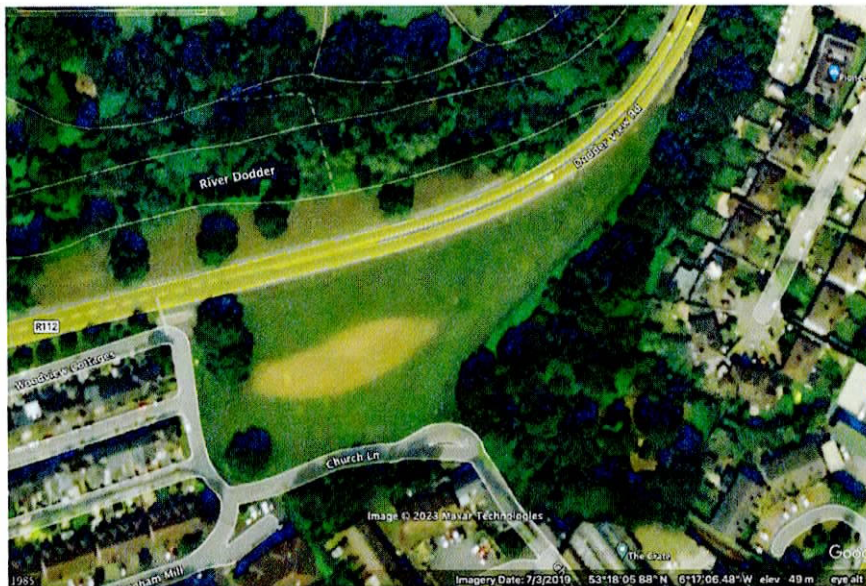


Image 5.3: Location and Extent of Construction Compound TR3

Fig 1.0 TR3 Compound Proposal above and as green space amenity below



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Selection Criteria

The location of the site has been selected purely for the convenience of its location with no consideration given to the suitability of the location. A very large construction compound on the site of a recreational amenity and within metres of residential properties is not suitable for the proposed project.

The criteria for the selection of the construction sites are summarised as such in [Chapter 6](#) as:

'The Construction Compound locations have been selected due to the amount of available space, their relative locations near to the majority of the Proposed Scheme major works and access to the National and Regional Road network.'

These are lazy and inappropriate selection criteria for major and disruptive construction sites, most notably site TR3, the largest of the proposed construction sites.

Construction Hours

[Proposed hours of construction](#) are:

'5.10.3 Construction Working Hours It is generally envisaged that construction working hours will be between 07:00hrs and 23:00hrs on weekdays, and between 08:00hrs and 16:30hrs on Saturdays. Night-time and Sunday working will be required to facilitate street works that cannot be undertaken during daytime / evening conditions.'

These hours of working are not suitable for a construction compound within 10m of a residential area for a minimum duration of 24 months. The proposal itself notes:

'The planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas.'

As site TR3 is proposed to be the *'primary construction site'* for the scheme, it will be in use for the above hours, regardless of where the specific works are taking place along the construction route, thereby not taking into consideration sensitive receptors, in particular nearby residential areas. The proposed construction period does not account for site preparation and remedial works nor construction run-over.

A recent [Inspectors Report](#) (ABP 309431 21) for planning of home extension on Woodview Cottages Inspectors Report creates a condition on the working hours for construction as:

'5. Site development and building works shall be carried out only between the hours of 0700 to 1800 Mondays to Fridays inclusive, between 0800 hours to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.'

The ambitious timeframe of 24 months to completion of the corridor project assumes shift working over the 0700 - 2300 working hours of the site five days per week and a full day 0800 - 1630 on Saturday. This is a total of 88.5 hours per week, or 52% of the available hours in a week.

If approved working hours were introduced, as proposed by Jane Dennehy in her Inspection Report (Senior Planner SDCC), the total available hours to work would be reduced from 88.5 hours per week to 61.5 hours, a reduction of 27 hours.

In other words, the Bus Connects Planners are assuming they can work 44% more hours per week than a Senior Planner in the Council will allow construction work to take place in a residential area (for clarity, site TR3 is in a residential area within 10m of private dwellings).

If you apply the Council construction working hours, as per the precedent of the Council Planners, the entire construction project, without overruns or unforeseen complications, will take a minimum of 34.5 months (+10.5 months over the proposal) to completion and not the proposed 24 months, which is reliant on highly disruptive working hours to be achievable. For the avoidance of doubt, I am opposed to the construction site's location in its entirety, however, planning to operate a construction site until 2300 in the evening in any residential area is an immediate failure of planning.

Further provisions are made to allow for construction at night and Sundays at the will of the contractor, allowing for the site to technically be used on a 24 hour / 7 day a week basis. As the proposed hours of work are already beyond normal construction working hours (assuming 0700 - 1800), the likelihood and willingness of the contractor to wish to work outside of the proposed hours on a regular basis can be regarded as high.

Weekly Hours	
NTA Proposed Hours	88.5
SDCC Approved Hours	61.5
NTA Additional Hours	+27
NTA % Additional Hours	+44%

Precedent & Delays

The proposed working hours of site TR3 are not acceptable to South County Dublin Senior Planners. The works on the site will be persistent over the course of construction of the scheme, similar to a residential or commercial project in situ. Whichever way the planning decision falls for the scheme, there will be one of two inevitable outcomes:

- a) a precedent will be set for planning in South County Dublin in relation to construction hours in a residential area, contrary to previous planning precedent or;
- b) lead to the delayed completion of the proposed scheme of a minimum 10.5 months before work can even break ground.

For the avoidance of doubt, the site should not be located in the proposed location regardless of the hours of operation. Such a disregard for residents impacted by the proposed construction project is indicative of the tone and voice of the scheme proposal in its entirety.

Pollution

(noise, environmental, climate, air quality, visual) and Unacceptable hazard

Hazardous materials, as identified in the EIA report and shown in the 'Storage area' of the proposed site map (Fig 1.0), are specifically to be stored at the closest point possible to residential homes, on the southern boundary of the proposed site. Hydrocarbons and other hazardous materials are to be stored here in case of leaks that could cause environmental damage. Instead, *residents* will be exposed to risks including fumes, leaks and fires at the closest point to their homes on the proposed site.

The type of waste being stored, including hazardous waste, within 10m of residential properties will include:

5.5.4.4 Construction Waste Generation

Construction works, site offices and temporary works facilities are also likely to generate waste. General construction waste can vary significantly from site to site but typically will include the following non-hazardous fractions:

- Soil and stone;
- Concrete, brick, tiles and ceramics;
- Bituminous mixtures;
- Metals;
- Wood;
- Municipal type wastes generated by construction employees; and
- Other.

The hazardous waste streams which could arise from construction activities include the following:

- **Waste electrical and electronic equipment (WEEE) components;**
- **Batteries;**
- **Asbestos;**
- **Wood preservatives;**
- **Liquid fuels; and**
- **Contaminated soil.**

Also included within this definition are surplus and damaged products and materials arising in the course of construction work or used temporarily during the course of on-site activities.'

and from the [Summary of Mitigation and Monitoring Measures](#):

'The appointed contractor will store fuels as far away as possible from the road to minimise the chances of an overland flow of spillages, especially via access and egress routes. All other high risk activities will be located at the southern boundary of the site.'

Hazardous Waste

Assuming the road that is being referred to is the R112, the storage area is within a few metres of another road, Woodview Cottages. Locating high risk materials and conducting hazardous activities in an area that is used by toddlers, children and the elderly on an hourly basis everyday of the week, is an entirely inappropriate use of land either temporarily or permanently. In particular, residents being exposed to asbestos and other hazardous materials poses long term risks to health, and the Council / NTA to the risk of litigation of same.

On a personal note, my partner and I have a newborn son and he will not spend his formative years living within arms reach of a site designated for the disposal of hazardous waste.

Noise and Visual

The magnitude of changes, reported in the [Landscape Changes](#), will be 'very high' for the proposed site. The visual pollution of a green recreational amenity is not an acceptable use of space for the proposed time period.

The TR3 site is deemed to be a Noise Sensitive Location within 10m of residential properties:

'Due to the nature of the activities undertaken on a construction site, there is potential for generation of high levels of noise. The flow of vehicular traffic to and from a construction site is also a potential

source of relatively high noise levels, the impact at nearby NSLs will depend upon a number of variables, the most notable of which are:

- The amount of noise generated by plant and equipment being used at any one time generally expressed as a sound power level;
- The periods of operation of the plant at the development site, known as the 'on-time';
- The distance between the noise source and the NSLs;
- The attenuation due to ground absorption or barrier screening effects; and
- Reflections of noise due to the presence of hard vertical faces such as walls'

A site operating within 10m of residential dwellings that is producing such significant noise levels is not appropriate.

In [Chapter 9 Noise & Vibration](#) of the impact report, the below map has not measured the impact of Construction Noise of the TR3 Construction Compound, the map only looks at the new route itself during construction.

And in the map (Fig 1.1) from the same [Chapter](#), baseline noise levels were measured under trees at the south western edge of the proposed site, whereas the greatest impact of noise will be at the Southernmost edge nearest the dwellings.



[Fig 1.1](#)

The average daytime dBs at the monitoring location was recorded at 60dB while the CNL levels are predicted at 78dB, or +18dB.

Noise Safety

The Construction Noise Level is predicted at 78dB 10m from residential dwellings. [Sustained exposure to noise above 80dB can lead to hearing damage](#) and it is recommended protection is used by the HSE. The reported dBs are just below what is considered an unsafe volume of noise without protection.

A construction site that is in operation 52% of the total hours available in a week would easily fall into the definition of sustained noise that could potentially damage hearing, particularly that of younger people, with a claimed difference of -2dB from an unsafe level of noise.

The reported CNL in the impact assessment is enough to cause hearing damage within 20m at 83dB at site 2b, which is serviced by Compound TR3. The Council, Contractors and NTA are putting residents at risk of hearing damage due their negligence and poor planning for the TR3 site location.

The Noise Chapter rightly notes the linear nature of the building works and the rolling impact of noise pollution for those affected along the route:

9.6.1 Construction Phase

Given the linear nature of the works, noise emissions related to construction works will be of temporary impact at any one area as the works progress along the length of the Proposed Scheme. The application of the proposed noise thresholds and restricted hours of operation, along with implementation of appropriate noise control measures, will ensure that noise impact is controlled within acceptable limit values.'

However, the works will be facilitated by the presence of the permanently operating primary construction site TR3, as such the unacceptable noise levels associated with the construction will be a permanent feature of the site and will not move in a linear fashion while the works progress along the route.

Ongoing Disruption

A reasonable period of disruption while improvement works take place in your area is an acceptable level of disruption for the long term benefits of a public works project, as residents have already accommodated for 4 years for the Greenway construction project site at the same location. A permanent site facilitating works that will be in operation a minimum of 88.5 hours per week is not an acceptable level of disruption for any residential area for any project.

Construction Traffic

'The estimated peak daily numbers of principal items of plant and equipment working within a section is indicated in Table 5.5. It should be noted that these are peak daily numbers.'

Plant / Equipment	Section																	
	1a	1b	1c	1d	1e	1f	1g	2a	2b	2c	2d	2e	3a	3b	4a	4b	4c	4d
Lorry (including concrete trucks)	10	8	14	14	12	14	4	10	16	14	14	14	14	18	12	14	12	1
Backhoe Mounted Hydraulic Breaker	2	3	3	3	2	2	1	3	2	2	2	2	2	2	2	2	2	0
8t (tonne) Excavator	3	3	4	3	3	3	1	3	3	3	4	4	3	4	4	3	3	1
13t (Rubber Wheeled) Excavator	4	4	4	4	4	4	2	4	2	2	2	2	2	4	4	4	4	1
16t (Rubber Wheeled) Excavator	2	2	3	3	3	3	0	3	3	3	4	4	3	4	4	3	3	0
8t Dumper	4	4	4	6	6	6	2	4	4	4	4	4	4	6	6	6	6	1
Road Planer	2	1	2	2	2	2	1	2	1	1	1	1	1	1	1	1	1	1
Road Sweeper	2	1	2	2	2	2	1	2	2	2	2	2	2	2	2	2	2	1
Asphalt Paver	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Asphalt Roller	3	2	3	3	3	3	1	3	3	3	3	3	3	3	3	3	3	1
3t Roller	2	2	2	2	2	2	1	2	2	2	2	2	2	2	2	2	2	1

Sites 2a to 2e are serviced by Construction Compound TR3. Only looking at Sections 2a - 2e in Table 1.0 below, the plant equipment movements equate to 191 movements on a daily basis or 1 every 5 minutes at peak.

Proposed Mitigation

Mitigation measures that are proposed along the construction route to minimise the level of disruption caused, namely hoarding, will go little in the way of mitigating noise coming from a field at the base of a hill within 10m of dwellings.

There are dwellings at the top of the hill along Church Lane and elevated apartments in Rathfarnham Mill that overlook the site. Woodview Cottages, as two opposing rows of houses at the bottom of the hill, funnels wind and noise through it as a result of its location. No level of hoarding will sufficiently mitigate the noise, dust and vibrations from the site to acceptable levels.

Plant Equipment	2a	2b	2c	2d	2e	Daily Total
Lorry (including concrete trucks)	10	16	14	14	14	68
Backhoe Mounted Hydraulic Breaker	3	2	2	2	2	11
8t(tonne) Excavator	3	3	3	4	4	17
13t(RubberWheeled) Excavator	4	2	2	2	2	12
16t(RubberWheeled) Excavator	3	3	3	4	4	17
6tDumper	4	4	4	4	4	20
Road Planer	2	1	1	1	1	6
Road Sweeper	2	2	2	2	2	10
Asphalt Paver	1	1	1	1	1	5
Asphalt Roller	3	3	3	3	3	15
3tRoller	2	2	2	2	2	10
					Total Movements	191
					Movements Every 5 mins	1.0
					Movements Per hour	12

Table 1.0 Constitution Traffic for Sections 2a to 2e only, as serviced by Site TR3

Site Egress

The level of traffic that will be entering and exiting the site will in its own right cause severe disruption and pose a danger to pedestrians and road users (egress noted on Fig 1.0).

Given the timeline of the proposal, it is likely the site was assessed prior to the completion of the current road works for the Greenway and have not taken into account the narrowed road that is now in place, which is already evidently unsuitable for the use of construction traffic in and out of the existing site.

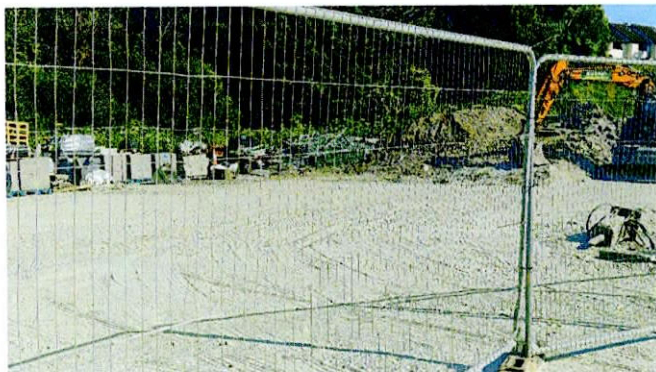


Fig 1.3 Site Egress as it currently is for the existing depot



Fig 1.4 Construction Compound TR3 - People Exercising (foreground) and children playing (background). The image is taken from the edge of the road at the Southern boundary of the proposed site. The proposed site will approximately extend to the flower planter in the foreground 01/06/23. In years there is snow, children slide down the hill and have fun on their community green.

Dodder Greenway

From the SDCC [website](#) for the Dodder Greenway (that is close to completion) along the R112 and has been serviced by a construction compound in the proposed TR3 location:

'The overall scheme's primary objectives are to deliver a successful Greenway and public amenity which maximises the following:

- Provision of an attractive Greenway and linear park;*
- Delivery of a Greenway for pedestrians / cyclists in a low speed, pedestrian priority environment;*
- Provision of linkages within the existing linear park system, particularly along roadways and existing road crossings;*
- Provision of a high quality surface whilst minimising maintenance costs;*
- Provision of an attractive, enhanced environment;*

- *Provision of a safe environment; and*
- *Enhancement of landscape and visual quality of the Greenway. The route must be sympathetic to the existing landscape.'*

Construction Compound TR3 is on the Dodder Greenway route. Works have been ongoing for almost 4 years in the area along the R112 as well as the construction depot for the same. At the time of submitting this observation, the works are ongoing.

Each of the above objectives of the Greenway are grounds in their own right to not locate a construction site, for an indeterminate number of years, along the Greenway route:

1. Provision of an attractive Greenway and linear park

The visual disruption and traffic from the construction compound will destroy any attractiveness of the route along the Dodder.

2. Delivery of a Greenway for pedestrians / cyclists in a low speed, pedestrian priority environment;

The volume of traffic from the site (1 arrival / departure every 5 minutes) creates danger and disruption for pedestrians, cyclists and cars on the route.

3. Provision of linkages within the existing linear park system, particularly along roadways and existing road crossings;

The linkage of the park to the road at a primary crossing site of the Dodder, the newly constructed red bridge, is across the road from TR3.

4. Provision of a high quality surface whilst minimising maintenance costs

Construction traffic will ruin the newly constructed road, footpath and car park that were completed literally weeks ago.

5. Provision of an attractive, enhanced environment;

Any illusion of an attractive and enhanced environment will vanish with the installation of the construction compound in this location.

6. Provision of a safe environment

Safety of residents, children, cyclists and motorists are all compromised by this site, specifically along the R112 and from Church Lane down to Woodview Cottages.

7. Enhancement of landscape and visual quality of the Greenway. The route must be sympathetic to the existing landscape

Pollution, noise, visual disruption and safety concerns associated with the TR3 site are at complete odds with the enhancement of landscape and visual quality of the Greenway.

Great efforts have been made to enhance the environment along the Greenway route, only for a proposed construction site to undo years of work and for the Council itself to throw away its own vision for SDCC: to provide for its community and visitors alike.

Ecological Destruction

Daubenton's Bat

Lighting will be required during the proposed working hours for site TR3, which in winter would constitute approximately 10 hours of flood lighting to be in use per day, the majority of which would be between the hours of 0700 - 0900 and 1600 - 2300 as well as the generators to power the lighting, further contributing to noise pollution at the times residents are most likely to be at home.

As part of the [Dodder Greenway EIA](#), the Daubenton's bat species was found to be in moderate to high concentrations in the vicinity of the construction compound, amongst other types of bats. The EIA notes this particular type of bat is particularly sensitive to light. As such, the permanent lightning ultimately installed in the vicinity of the new bridge and along the Greenway is sympathetic to the bats and their nesting grounds. The construction compound lighting, particularly its use during winter months and migration periods, will pose a danger to the bats in the area and in particular the Daubenton's.

'Daubenton's bat was predominantly recorded in the middle section of the Greenway, along the stretch of river from the Templeogue Bridge to Orwell Road, downstream of which it was not recorded. Daubenton's Bat was also recorded at Glenasmole Reservoir and above the Firhouse Weir. The highest densities of detections were found at the Firhouse Weir, in Bushy Park and in the vicinity of the Rathfarnham Weir.'

The Daubenton's emerge later than other bats after dark to avoid daytime predators and *'they are heavily dependent on aquatic insects and often feed over water'*. The presence of harsh artificial lighting less than 100m from their feeding and nesting grounds, late into the evening, will likely have a detrimental impact on the bat's ability to feed and to migrate from their Summer to Winter nesting places:

'The European Communities (Birds and Natural Habitats) Regulations, 2011(S.I. 477 of 2015) makes it an offence to deliberately capture or kill Bats in the wild, to deliberately disturb them particularly during the breeding, rearing, hibernation and migration seasons, or to cause the deterioration or destruction of their breeding and resting sites.'

Lighting at construction Compounds

In Section 12.4.3.4.1.3 of the [Biodiversity](#) report, the impact of lighting it is noted at the construction compounds in particular:

'Security lighting will be installed in these compounds for the duration of construction (i.e., 24 months), thereby temporarily increasing the level of artificial lighting in this area...Provided security lighting does not involve high intensity lighting (e.g., floodlighting) (emphasis added by AY) the impact of increased artificial lighting at Construction Compounds is considered to be significant at the local level only...The bulk of the construction works along the Proposed Scheme will typically be undertaken during normal daylight working hours, although it is recognized that some elements of night-time work may be required. The bulk of the existing corridor is largely illuminated by regularly spaced lighting columns for much of its length and therefore the requirement for lighting to accommodate construction works during night-time will be limited, in areas where existing light levels are low and of short duration. The effect of the additional lighting is therefore considered to be significant at a local level only and temporary.'

While these might appear to be appropriate mitigation measures to preserve the bat population, we know them to be unimplementable and false, as from the [Construction](#) document:

'Temporary lighting will also be installed at the Construction Compounds for the duration of the Construction Phase...temporary construction lighting will generally be provided by tower mounted floodlights, which will be cowled and angled downwards to minimise spillage of light from the site.'

and that the hours of operation of the site will extend into hours of darkness as the proposed sites will be operating from 0700 to 2300 hours.

Reassessment and Inaccurate Information

The environmental impact must be reassessed based on the inaccurate information the Biodiversity Consultant used as their source material on both the hours of site operations and type of lighting that will be required to facilitate the use of the sites after dark.

Presumably the inaccurate information was provided by the NTA/ Bus Connects in the first place, raising questions as to where else information has been incorrectly provided in assessing other elements of the proposal.

Air Quality

The dust pollution that will be created from the site will be significant. It is already a known factor given the use of part of the proposed site currently as a construction site for the Greenway works. A recent dry day of the dust being created by *one* excavator in the below image (Fig 1.5).



Fig 1.5 30/05/2023 - Dust from the existing construction site for the Greenway

Personally, I suffer from asthma and this is exasperated on particularly dusty days from the site. Additionally, personal cars and home windows are covered in dust on a daily / weekly basis.

Proposed mitigation measures include hosing the ground. Given the above image and the extent to which the site will be used on a daily basis, such a measure is unlikely to prove practicable or efficacious.

The proposed site is significantly larger (5,120 sqm) than the existing site above by approximately 4,000 sq m or 4 x larger and will have a noticeably larger quantity of traffic, will be supporting a significantly larger construction project and will have multiples of the workers using the existing site in Fig 1.5. This will be in addition to the hundreds of truck journeys, loaders, dumpers and excavators that will need to refuel on site over the course of any given week.

CPO Architectural Conservation Area and Community Amenity

The entire proposed site is within the [Rathfarnham Architectural Conservation Area](#) (ACA) as seen in the Fig 1.6. Regardless of the proposed temporary nature of the site, the *Chapter 15 Archaeology & Cultural Heritage* refers to the TR3 site as having 'no amenity features present'. This assertion is clearly false by virtue of the fact the green space is in itself an amenity feature that is used daily by residents, workers and visitors to Rathfarnham village while the Compulsory Purchase Order (CPO) for the site (Reference: 1004(1).2f) specifically refers to the site description as a 'Recreational Area'.

Primarily, the conditions for a CPO of the lands in the Rathfarnham ACA have not been met as per Section 83 of Planning and Development Act 2000 as the use of the land itself is not part of the development works as outlined in Section 3 and 4 of the Act.

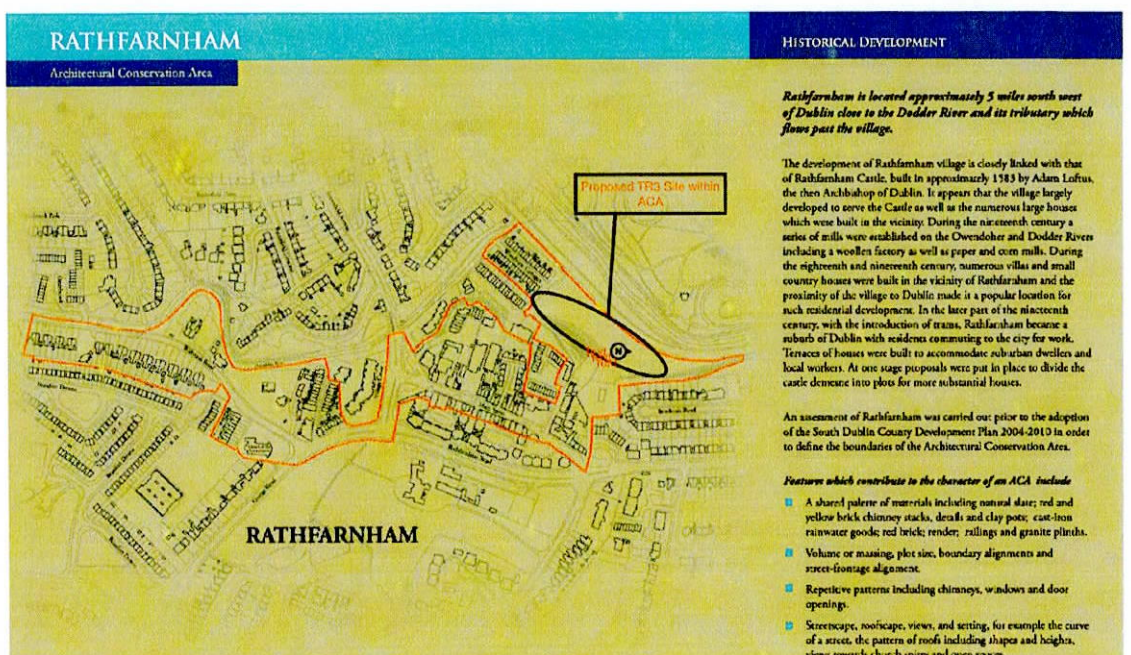


Fig 1.6

Drainage

A recent [Inspectors Report](#) (ABP 309431 21) for planning of a home extension on Woodview Cottages was refused on two grounds, one of them being on water run off from a single small 2 bedroom property impacting the drainage on the sewer system (on subsequent appeal permission was granted with conditions).

[Chapter 13 Water](#) of the EIAR notes a 'moderate' impact of site TR3 on water runoff which is at odds with a Senior Planner of SDCD in the above Inspectors Report. They indicate minor changes to a small residential dwelling, on grounds of refusal of planning, notes:

'2. 'The proposed development would increase the surface water being directed into a combined sewer. This does not accord with the Greater Dublin Drainage Strategy or Irish Water standard requirements and is contrary to the proper planning and sustainable development of the area.'

The proposed construction site TR3 will cater, as per the proposed scheme, to the needs of hundreds of construction workers (250 workers at peak) and will likely have a significant impact on drainage and would not accord with the Greater Dublin Drainage Strategy, even on a proposed temporary basis. Woodview Cottages in its entirety houses approximately 80 people in 30 homes.

The recreational green area the site is proposed to sit on acts as a drainage sink and is on a flood plain for the Dodder with a [low to medium flood risk](#).

Flood Risk Assessment

A Flood Risk Assessment for site TR3 has not been undertaken. [The Flood Risk Assessment Document](#) has only reviewed the flood risk of the proposed Bus Connects route and has not undertaken the task of assessing flood risk at construction site TR3, which is not on the Bus Connects route.

The scope of the flood assessment was:

'The Flood Risk Assessment (FRA) will include the following:

- *Confirmation of the sources of flooding which may affect the site;*
- *A qualitative assessment of the risk of flooding to the site and to adjacent sites as a result of construction of the proposed development,*
- *Review of the availability and adequacy of existing information,*
- *Identification of possible measures which could mitigate the flood risk to acceptable levels, and;*
- *Areas for further investigation (Stage 2 FRA) if required'*

Construction sites were not within the scope of the assessment. A Flood Risk Assessment will therefore need to be undertaken to assess the suitability of the Construction sites for their use prior to any further approval, in particular site TR3 that sits on a drainage sink.

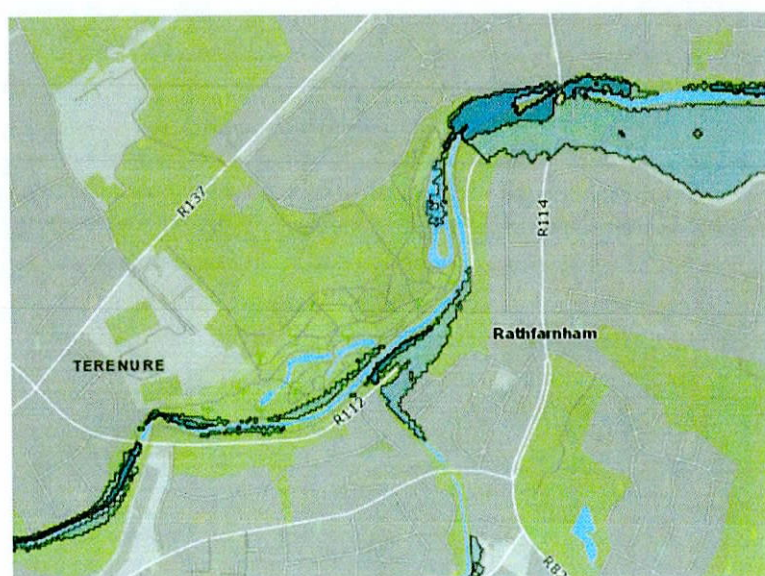


Fig 1.7 - Flood Risk Map - Site TR3

Temporary Compulsory Purchase Order

The CPO for the construction compound is subject to a compulsory land temporary land acquisition "Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme, Compulsory Purchase Order 2023"

Undetermined end period to the use of a 'temporary'

There is no end date for construction or definition of temporary in the Bus Connects proposal. Lands that are temporarily subject to a CPO can be extended, thereby creating a situation in which the construction site will be in use for as long as is deemed necessary to complete the construction works. As already noted, the 24 month proposed construction time is dependent on working through the hours of 0700 - 2300 on weekdays and all day Saturday. Without a defined end date or time limited use of the site, the proposed construction site will in effect be permanent and will be experienced as such by residents while the project goes through inevitable delays and court proceedings etc..

Unsuitable parking

The area in and around Woodview Cottages offers free on-street parking. This has been agreed upon by the residents of the road for convenience and has generally worked well for the community. Visitors often park to make use of Bushy Park across the road and those working in Rathfarnham village will park there too. It can sometimes be an inconvenience but has not caused much of a problem in general.

As part of the Greenway works, a new parking lot was installed adjacent to the proposed TR3 Construction Compound and serves as the entrance to the current building depot that is in place at the northern section of Fig 1.0 (4 times smaller than the proposed TR3 site).

During weekdays, this car park is used almost exclusively by workers from the construction site. This is not a concern as the car park is generally not required by residents (although they do often park there) and the number of construction workers is relatively low compared to the proposed hundreds that will be using site TR3. The car park has at least 10-15 cars using the immediately available parking beside the site on a daily basis. From Fig 1.0 it can be seen there is a small facility allocated to parking on the proposed site, and generally as per the scheme report, car use will apparently be a minor issue:

'A combination of CSMMP measures, as well as work shift patterns, means that fewer than 10 trips by private vehicle are envisaged to and from site during peak periods'.

As hopeful a strategy as that is, the reality of having hundreds of workers using a construction site that operates from 0700 in the morning to 2300 at night will attract a high degree of private vehicle usage during the week and at weekends. Construction workers will fairly seek out the freely available (and free) parking in the area, namely Woodview Cottages, which is conveniently located less than 10 metres from their place of work, thereby rendering a slightly precarious but functioning parking facility for residents potentially unusable. The fact workers will be arriving in two shifts will only exacerbate the situation, as any available parking will therefore be in near constant use day and night.

Paid parking may have to be introduced (thereby enforced by the Council) in order to ensure parking remains available for residents of Woodview Cottages, none of whom have off-street parking and, to date, have collectively opposed paid parking. The shift pattern of the site will require paid parking into the evening and not just during the day, as is standard for the area and Rathfarnham Village.

Journey Time 'Improvements'

The entire project, for all its disruption and significant costs, aims to achieve a 1.6 min improvement in Bus Times - this is the best example the authors could find worthy of inclusion in their proposal. No further comment required.

Table 6.48: A3 Service Bus Average Journey Times (Inbound Direction)

Peak Hour	Do Minimum (minutes)	Do Something (minutes)	Difference (minutes)	% Difference
2028 AM	11.7	10.1	-1.6	-14%
2028 PM	11.0	9.9	-1.1	-10%
2043 AM	10.7	10.0	-0.7	-7%
2043 PM	10.8	9.8	-1.0	-9%

Additional information regarding the range of journey times (minimum, maximum, average and standard deviation) for inbound A3 buses in the Do Minimum (red) and Do Something (blue) can be seen in Table 6.49 and Diagram 6.18. Each dot in the diagram represents the journey time for each individual bus in each scenario. A larger range of journey times are an indication of lower levels of reliability in a given scenario.