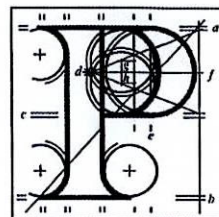


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Aislinn Collins
588 Woodview Cottages
Rathfarnham
Dublin 14
D14 FT22

Date: 16 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 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 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

Tel	Tel	(01) 858 8100
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Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

**Submission regarding Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme
(13/08/2023)**

ABP Case Reference Number: 316272 (HA29N.316272)

Name: Aislinn Collins

Postal Address: 588 Woodview Cottages, Rathfarnham, Dublin 14, D14 FT22

To whom it may concern,

I would like to submit the following observations in relation to the Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme. While I am a daily public transport user and am generally in favour of the Bus Corridor Schemes being developed by the National Transport Authority, I have a number of serious concerns in relation to the location of the main Construction Compound (TR3) to be used for the duration of the construction of the Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme. My key concerns relate to land use zoning, flooding, impacts on archaeological/architectural heritage, and impacts on residential amenity to residents of Church Lane, particularly those of Woodview Cottages.

Land use zoning

The South Dublin County Development Plan 2022-2028 (hereafter Development Plan) assigns Zoning Objectives to all lands in the County. The zoning maps accompanying the Development Plan indicate that the land on which the main Construction Compound for the scheme (TR3) is proposed is zoned 'OS' Open Space 'to preserve and provide for open space and recreational amenities' (see Figure 1)



Figure 1: Extract from land use zoning map from South Dublin County Development Plan 2022-2028 showing site compound with 'OS' Open Space zoning.

The Development Plan also identifies the classes of development and uses that are 'permitted in principle', 'open for consideration' or 'not permitted' within each identified land use type. Table 1 below indicates that use classes relating to Zoning Objective 'OS': 'To preserve and provide for open space and recreational amenities':

Permitted in Principle	Allotments, Community Centre, Cultural Use, Open Space, Recreational Facility, Sports Club / Facility.
Open for Consideration	Agriculture, Bed & Breakfast (In existing premises), Camp Site, Car Park (For small-scale amenity or recreational purposes only), Cemetery (If provided in the form of a lawn cemetery), Childcare Facilities, Crematorium, Education, Garden Centre, Guest House (In existing premises), Home Based Economic Activities (In existing premises), Hotel / Hostel, Housing for Older People (Only where this accords with H3 Objective 4), Outdoor Entertainment Park, Place of Worship (In existing premises), Public Services, Recycling Facility, Residential (Only where this accords with H3 Objective 4), Restaurant / Café, Shop-Local, Stadium, Traveller Accommodation
Not Permitted	Abattoir, Advertisements and Advertising Structures, Aerodrome / Airfield, Betting Office, Boarding Kennels, Caravan Park-Residential, Concrete / Asphalt Plant in or adjacent to a Quarry, Conference Centre, Data Centre, Doctor / Dentist, Embassy, Enterprise Centre, Fuel Depot, Funeral Home, Health Centre, Heavy Vehicle Park, Hospital, Industry Extractive, Industry-General, Industry-Light, Industry-Special, Live-Work Units, Motor Sales Outlet, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq. m, Offices 100 sq. m-1,000 sq. m, Offices over 1,000 sq. m, Off Licence, Petrol Station, Primary Health Care Centre, Public House, Refuse Landfill / Tip, Refuse Transfer Station, Residential Institution, Retail Warehouse, Retirement Home, Rural Industry-Food, Science and Technology Based Enterprise, Scrap Yard, Service Garage, Shop-Major Sales Outlet, Shop Neighbourhood, Social Club, Transport Depot, Veterinary Surgery, Warehousing, Wholesale Outlet, Wind Farm, Work-Live Units

Table 1: Table 12.15 from the South Dublin County Development Plan 2022-2028 indicating use classes relating to Zoning Objective 'OS' (Open Space).

It is noted in the above table that construction compound (or similar/associated) are not included in uses that are Permitted in Principle or in uses that are Open for Consideration for this zoning type. Uses mostly closely related to those that will occur within the proposed construction compound (including Fuel Depot, Heavy Vehicle Park, Industry, Offices, and Transport Depot) are all included in the uses that are Not Permitted for this zoning type. Therefore the proposed use of this location as the main construction compound for a large scale construction project contravenes the Development Plan and should not be granted permission.

The site of the proposed construction compound is located in the Dodder River Valley and within the Dodder Valley Linear Park. The Development Plan indicates that this connects the High Amenity Area of the Dublin Mountains to Dublin Bay, creating an corridor of National Importance through Dublin for key species, habitats and for the residents of the city. The natural character and accessibility of the linear park is recognised as significantly important to local residents facilitating walking and cycling and engagement with nature. Policy NCBH8 of the Development Plan (SDCC 2022, p. 98) seeks to 'Protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley, as a key element of the County's Green Infrastructure network'. The construction of a large scale construction compound will not enhance but will inherently damage the amenity value of

this green space and therefore the proposed development will contravene the policies and objectives of the Development Plan.

Potential flood issues

The Development Plan states that according to Sustainable Drainage Systems (SuDS) 'natural features and open spaces such as parks or forests help retain and store stormwater....while reduced open space provision and higher rates of impermeable paving' lead to 'challenges around surface water management' in urban areas (SDCC 2022, p. 149). The site of the proposed construction compound is located on a level open greenfield site at the base of sloping ground to the west of Church Lane, Rathfarnham Village. The Dodder River is located to the west of the site, while the Owendoher Stream is located to the southwest. The EPA website indicates that the area around Dodder View Road/Woodview Cottages lies within Flood Zone B (1 in 1000 year flood extents) and has been subject to significant flood events in the past, the most recent recorded event being in 2010. More recent pluvial flooding events c. 2018 have indicated the value of the green space as a temporary storage area for excess rainwater. I have recently purchased a house on the northwest side of Woodview Cottages and was not able to obtain flood insurance due to the inherent risks of the site identified by the EPA.

The impact of the construction compound TR3 has been assessed in Chapter 13 or Appendix A13.2 of the EIAR in terms of potential impacts on waterbodies from contaminants. However no specific consideration of the impact of the replacement of the open green space at Dodder View Road/Church Lane with a hard surfaced construction compound has been considered. This replacement has the potential to increase the risk and impacts of both pluvial and fluvial flooding to residents, particularly those at Woodview Cottages. Any increase in flood risk to the residents of the cottages, particularly those without flood insurance, would be considered significantly negative. The proposed construction compound should not be granted permission due to the potential for increased flood risks.

Impacts on archaeological heritage

The Record of Monuments and Places and Development Plan maps indicate the location of proposed compound is in close proximity to a number of recorded monuments including Rathfarnham Church site (DU022-013001), graveyard (DU022-013002) and grave slab (DU022-013003) to the immediate east of the site and the site of a water mill (DU022-070) to the immediate south of the site. The Archaeological Assessment of the EIAR (Chapter 15 and Appendix A15) indicate that no impacts are predicted associated with the construction of the site compound and therefore no mitigation measures are proposed. However the proximity of these sites and their possible association during the medieval period indicate that the site of the proposed compound may have been used for associated activities. It is noted that the compound has been extended slightly to the south in recent months with planning permission and with no archaeological monitoring of the extension evident.

Impacts on architectural heritage

The site of the proposed compound is located within the boundary of the 'Rathfarnham Village including Willbrook' Architectural Conservation Area in the Development Plan (SDCC 2022, pp. 121-122, see Figure 2 below). An Architectural Conservation Area (ACA) 'is a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or value or that contributes to the appreciation of Protected Structures. An ACA may consist for example, of a row of terraced houses, a street, a village centre or a cluster of structures'. The Council seeks 'to ensure that new development and works within ACAs and village areas respect the historic status of the area and demonstrate an awareness of the historic surroundings on the part of designers, developers, building occupiers and owners. This will serve to protect and enhance the architectural heritage of the area and will ensure that new development adds to the character of the area and reinforces its sense of place'. Policy NCBH20 of the Development Plan aims

to 'Preserve and enhance the historic character and visual setting of Architectural Conservation Areas and carefully consider any proposals for development that would affect the special value of such areas'. The construction of a large scale construction compound within the boundary of the ACA at Rathfarnham will detract from the architectural heritage of the area and will have a significant impact on the visual setting of the ACA, particularly on the terraces of houses at Woodview Cottages designed by the former South Dublin Rural District Council Architect T. J. Byrne. Therefore the construction of the compound contravenes the policies and objectives of the Development Plan and should not be permitted.

The Architectural Heritage Chapter (Chapter 16) of the EIAR indicates that 'there are no direct impacts on any of the ACA's within the Proposed Scheme'. This is factually incorrect as the main construction compound (TR3) will be constructed within the boundary of the 'Rathfarnham Village including Willbrook' Architectural Conservation Area. The Direct, Negative, Significant, Temporary impact associated with the construction/use of this compound is not included in the summary of predicted construction phase impacts (Table 16.17, p. 62).

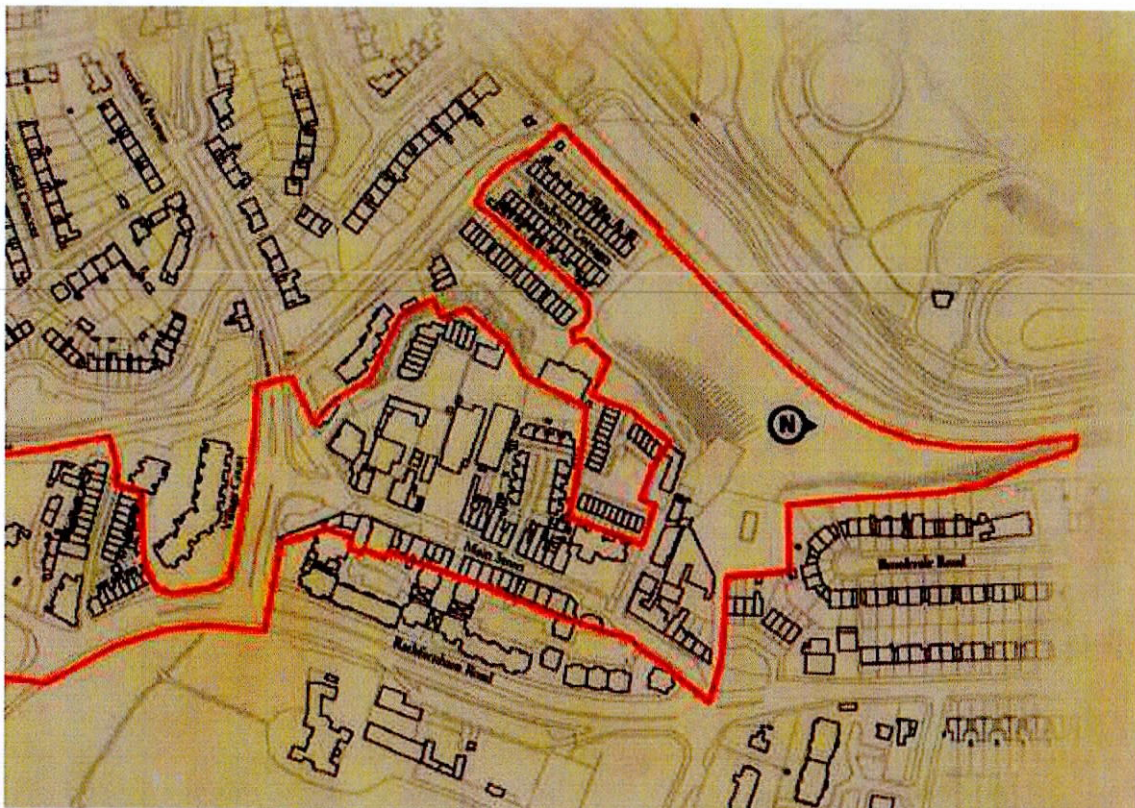


Figure 2: Extract from Rathfarnham Architectural Conservation Area showing site of construction compound to north-west end (source <https://www.sdcc.ie/en/services/planning/heritage-and-conservation/conservation-areas/rathfarnham-architectural-conservation-area.pdf>).

Impacts on residential amenity

The north end of the site of the proposed compound has housed a smaller construction compound for the duration of works associated with the construction of the Dodder Greenway project. This compound has been in situ for over two years to facilitate the construction of the adjacent Greenway Bridge and associated road and cycleway improvements. The use of this compound has impacted residential amenity for residents of Church Lane, including Tournville, the Mill and Woodview Cottages. Issues have included long work hours (including unannounced night works when road closures were required), increased airborne dust and noise from the construction compound. Residents were

assured that on the completion of the Dodder Greenway works the existing compound would be vacated and remediated to form part of the existing green open space.

Instead the compound will be significantly extended to over 5,120m² bringing the boundary within c. 20m of the residences at Woodview Cottages. The timeline indicated for the overall project (and therefore use of the main Construction Compound TR3) is estimated at 24 months. However the EIA indicates that impacts from other schemes may extend these timelines. The drawing included in the Construction Compound of the EIA indicates that the south end of the compound, i.e. that closest to the cottages will be used as a materials stockpile area. The stockpiling of these materials (identified as including topsoil, subsoil, concrete, rock etc) in proximity to the residences will increase the volume of airborne dust with associated impacts on the amenity use of garden spaces and health risks to residents, particularly the young/elderly or those who have underlying health issues. The EIA (Chapter 05, p. 25) indicates that only limited parking will be provided at the compound and it is likely that this will not be sufficient for required NTA and Contractor staff levels estimated at 200-250 person for the scheme, leading to use of the adjacent public car park and limited residential parking in the locality.

As works are not proposed in the vicinity of the compound, the closest location being on the Rathfarnham Road, it is likely that heavy plant traffic movements will be required along Dodder View Road to move plant to work locations. It is likely that these movements will occur throughout the work day but will be concentrated at the beginning (07:00hrs) and end of construction work hours (23:00hrs) causing noise pollution and significantly impacting the residential amenity of local residents. The EIA indicates that works may also be required outside these hours. As noted previously unannounced night works were experienced by local residents as part of the Dodder Greenway project. It is also possible that the movement of heavy plant machinery along the Dodder View Road will damage the new road surface installed as part of the Dodder Greenway Works.

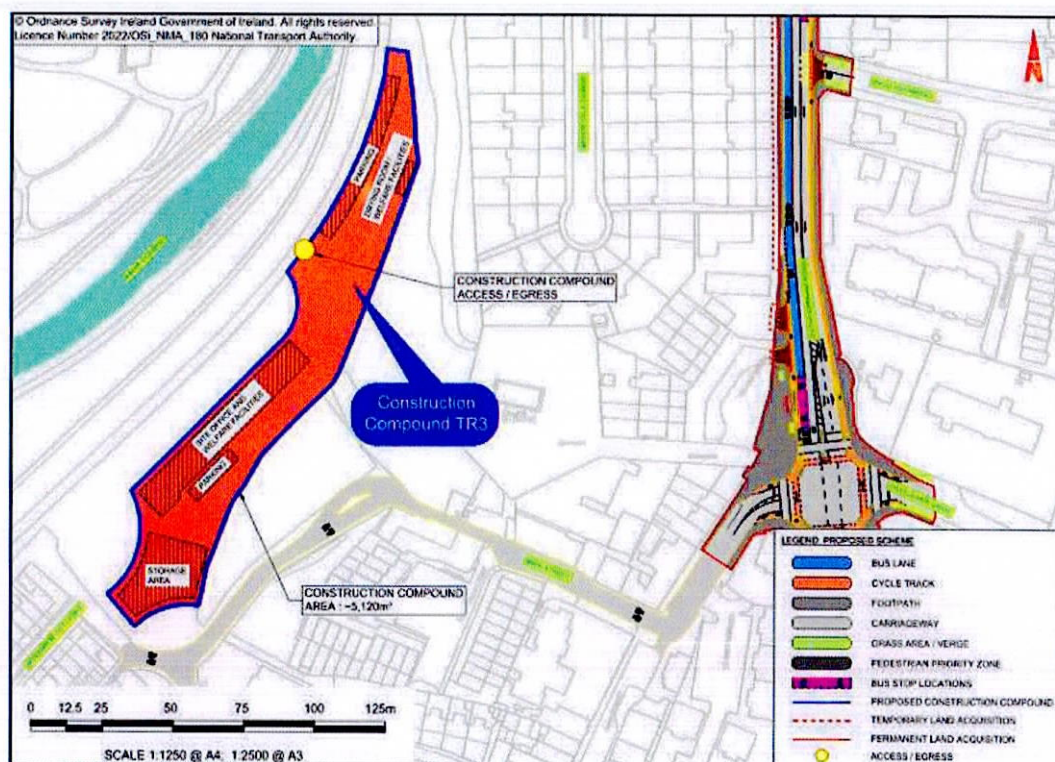


Figure 3: Construction Compound TR3 (Environmental Impact Assessment Report, Chapter 05 Construction p. 22).

Conclusion

Overall I believe that the construction of the main construction compound TR3 contravenes a number of policies and objects of the the South Dublin County Development Plan 2022-2028 in terms of land use zoning, flooding, and impacts on archaeological/architectural heritage. It also impacts unfairly on the residential amenity of Woodview Cottages in terms of potential increased flood risk, increased airborne dust and increased construction traffic and construction noise. I thereby request that you do no grant permission for this element of the scheme and look to alternate locations which do not impact so significantly on residential receptors.