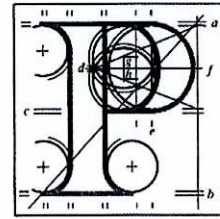


Our Case Number: ABP-316272-23



An
Bord
Pleanála

Alan Murphy
23 Delaford Lawn
Knocklyon
Dublin 16

Date: 17 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

Tell	Tel	(01) 858 8100
Glaó 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

23 Delaford Lawn
Knocklyon
Dublin 16

An Bord Pleanála (Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1
D01 V902

AN BORD PLEANÁLA	
LDG-	<u>065686-23</u>
ABP-	<u>316272-23</u>
14 AUG 2023	
Fee: €	<u>50.00</u> Type: <u>card.</u>
Time: <u>2.58pm</u>	By: <u>14/8/23</u>

13 August 2023

**BusConnects Templeogue / Rathfarnham to City Centre CBC proposals and planning application
Impact on Rathfarnham Castle Park**

Dear Sirs,

I wish to strongly object to the above proposals. The Woodland of Rathfarnham Castle Park is a wonderful wildlife habitat and a great amenity for the wider area. It has a diverse range of wildlife, especially protected wild birds, bats, frogs, bees, ducks and squirrels. There is a local river which runs through the woodland area, the Glin River.

I feel that the bus corridor should terminate at the end of the Rathfarnham Village bypass (by the Butterfield Avenue junction). There should be a signal controlled priority light to give priority to outbound buses passing the Park. (There is already an inbound bus lane running alongside the Park). The BusConnects proposals would cause irreparable harm to the Woodland as a biodiverse wildlife habitat and peaceful natural oasis so close to Rathfarnham Village.

The main reasons for my objection are:

- 1. Excessive Land Take** – I see that “up to 10 metres” of woodland area is set to be built over for road widening purposes. However the existing road is over 15 metres wide and does not need to be widened by up to 10 metres. That is manifestly excessive. It is clear that outbound buses should be prioritised, however this can easily be done without impact on the Park by means of a signal controlled priority light at Butterfield Avenue.

Otherwise, the Grange Road already has an inbound bus lane. The carriageway is 9.85m, which is 0.85m wider than necessary for the bus lane and two general traffic lanes on this road. There is a segregated 1.7m footpath and 1.4m cycle path running outbound beside the park wall. (I note that the nearby newly redesigned Dodder View Road, which has extensive grassy areas and therefore no space constraints, also has 1.4m cycle lanes.) On the inbound side of the road, there is a 2.15m footpath. Cyclists share the bus lane, as is proposed in the Scheme in locations like part of Rathfarnham Road and Terenure Road East.

As stated, the only element which really needs improvement is the outbound bus element, which can be done simply by prioritising outbound buses with a signal controlled priority light at the current Rathfarnham Village bypass, at the junction with Butterfield Avenue.

Otherwise, the existing road width appears to be adequate, especially given the huge environmental cost of seeking to widen it.

It is very significant that this is the last section of the proposed bus corridor and the adjoining roads do not have sufficient space for continuing bus lanes after the next junction (at Nutgrove Avenue). It makes no sense to cause so much destruction to a woodland area and an important public amenity, unless there it makes sense in practical terms and there is absolutely no other option. That is manifestly not the case here.

- 2. Environmental** – the Park is a wonderful habitat for wild birds and wildlife, a mini nature reserve in an urban area. Despite the fact that it will be significantly impacted by the proposed road widening works, it has not actually been surveyed in relation to most aspects of biodiversity, such as wintering birds or other protected species. However it is a very successful breeding area especially for frogs, squirrels, tufted ducks, mallards and many other species. It should be valued as a peaceful wildlife habitat, not turned into a construction site. If that happens, there will be so much disruption and upheaval that the current successful breeding status of this area is not likely to continue into the future.

There are many protected species living and breeding in the park and their interests have been overlooked. There are tufted ducks, mallards living on the pond, while mandarin ducks, a grey heron and black headed gulls are frequent visitors. The Woodland area is a habitat for a large number of squirrels, some foxes, frogs and many other species. Bats live in the trees and two trees with bat roosts are set to be cut down under the proposals.

There is a very large number of mature trees, bushes and undergrowth in the affected part of the Woodland area which give it a wonderful peaceful atmosphere in which children can play. The trees absorb carbon, pollution and noise. Given the concerns regarding climate change, it makes absolutely no sense to destroy a significant part of one of the limited natural woodland areas in the locality for road widening purposes. International developments, especially EU, are moving towards the restoration and encouragement of nature, especially in urban areas where it is particularly precious. Actively removing a wildlife habitat and damaging an ecosystem would run entirely counter to this.

Given that the park is situated right at the end of the bus corridor, and given that the adjoining roads do not offer scope for a continuing bus corridor, it makes absolutely no sense to cut down such a large amount of woodland for the sake of 450 metres. Particularly when it is clear from the above that the only improvement really needed to Grange Road is the prioritisation of outbound bus services. These can be done with a bus priority light, without needing to impact the park at all. The rest of the >15m roadway is adequate.

- 3. Impact on Vulnerable Groups** – There is a fundamental lack of understanding of just how important the Woodland area is both to the local community in general and to the wider community of autistic and neurodiverse people. It is a peaceful, serene area, surrounded by trees and nature. It is also loved by young children as a natural play space, even apart from the Woodland Playground infrastructure.

The Woodland area should be specifically considered under the DMRB Guidance as being of high sensitivity as it is effectively a nature reserve which is of high importance to vulnerable groups such as people with autism or neurodiverse people, and those with sensory needs.

The area would be lost forever to these vulnerable groups as an area for enjoyment and sensory regulation, as the magical sense of being out in the country would be lost, with the wall and traffic right beside the play space rather than being separated by up to 10 metres of trees, bushes and undergrowth, as is currently the case.

Conclusion

The proposed taking of a substantial part of the Woodland area of Rathfarnham Castle Park is excessive and entirely unnecessary. Once outbound buses are prioritised with a signal controlled priority light at Butterfield Avenue, the remainder of the >15m roadway is sufficient for the inbound bus lane, two general traffic lanes and pedestrian and cycling facilities. Given the climate crisis, unnecessarily destroying up to 10 metres of a peaceful woodland habitat and important hydrological resource would be unconscionable.

Yours faithfully,



Alan Murphy.