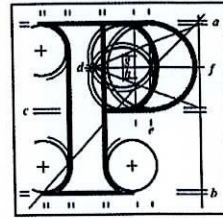


Our Case Number: ABP-316272-23



An
Bord
Pleanála

Daria Sochacka and William Mc Elinn
49 Rathfarnham Road
Terenure

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

49 Rathfarnham Road
Terenure
Dublin 6W

AN BORD PLEANÁLA	
LDG-	<u>065711-23</u>
ABP-	<u>31022-23</u>
14 AUG 2023	
Fee: €	<u>50.00</u> Type: <u>card</u>
Time:	<u>2.44 pm</u> By: <u>hand</u>

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

13 August 2023

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

Dear Sirs,

We wish to strongly object to the above proposals. They will cause very substantial, permanent harm to a large section of the Woodland of Rathfarnham Castle Park, which is a vital amenity for the entire area. We live within walking distance of the Park and visit it regularly with our family. There is a wonderful range of wildlife there which is lovely for children to see, especially unusual wild birds, plenty of frogs and lots of squirrels. We do not see this wide range of wildlife in other local parks.

A local river, the Glin, runs through the woodland and will run under the proposed bus corridor in two locations. However there appears to be no awareness or understanding that it is even there, let alone its significance from an environmental or hydrological perspective. Yet it is a vital component of the Woodland area.

We 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). It would destroy the Woodland area for it to be built over as proposed.

The main reasons for our objection are:

1. **Excessive Land Take** - We note that "up to 10m in width from an approximately 400m long section of existing roadside grounds at Rathfarnham Castle, including removal of roadside trees, boundary wall and entrance to grounds / park opposite Yellow House" is set to be built over for road widening purposes. This is a very large area which is highly significant from an environmental perspective as well as being a wonderful public amenity. Yet the existing road is over 15 metres wide as it runs alongside the park. There is absolutely no need for this road to be widened by up to 10 metres.

As it stands, the Grange Road has an inbound bus lane. The carriageway element is 9.85m, which is 0.85m wider than necessary for the bus lane and two general traffic lanes on this road. There is also a segregated 1.7m footpath and 1.4m cycle path running outbound beside the park wall. (We 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.

The only element which 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 (see below).

In any event, 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 Rathfarnham Wood / Nutgrove Avenue). It makes no sense to cause so much destruction to a woodland area and an important public amenity, for the sake of 450 metres.

2. **Flora and Fauna** – the Park is an amazing habitat for wild birds and wildlife, a mini nature reserve in an urban area. It has been surveyed in relation to trees and bats, but not in relation to 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 17 tufted ducklings growing up on the pond at present, there have been three families of mallard ducklings this year and also moorchicks. A kingfisher was spotted recently. Two 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.

3. **Hydrological** – The Glin River / Whitechurch Stream, which runs through the affected woodland area and under the proposed bus corridor, has been entirely overlooked. It is an open watercourse at many points within the Park and feeds and drains the duck pond. It is set to be built over to a very significant extent under these proposals (up to 6 metres where it enters the Park). It is a fragile resource which needs to be protected as it blocks easily and needs constant monitoring.
4. **Climate** – 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 our concerns regarding climate change, it makes absolutely no sense to destroy a significant part of one of the limited natural play spaces in the locality for road widening purposes.

All international developments are prioritising 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. At least a quarter of all of the trees set to be lost on this corridor, and more likely half of them, are situated in this

one small woodland area. (The arboricultural assessment only looks at a limited selection of trees, whereas this is a woodland with many smaller trees, bushes, wild flowers, undergrowth etc, all of which were disregarded.) The corollary of this is that this massive quantity of trees, bushes, undergrowth etc can be saved if the Woodland is spared.

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 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.

5. **Land Use Character** – 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 greatly 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.

6. **Landscape and Visual** – The Woodland area has a wonderful variety of mature trees, bushes and general greenery which give a sense of being out in nature, all while being just a few minutes' walk from Rathfarnham Village. This will all be cleared under the proposals, which will mean the loss of this peaceful, unspoilt, natural vista. The shelter and shade provided by the trees means that the area is highly valued in all seasons.

There is an excellent, high quality, granite faced boundary wall from the boundary with Rathfarnham Wood up to the pedestrian entrance by the Yellow House. There is absolutely no reason for this wall to be taken down as it is in excellent condition. A roughcast rendered replacement wall would look far inferior.

7. **Noise and Vibration** – The impact of the construction works themselves would cause profound disruption to the many and varied breeding wildlife habitats in the Park and the Glin River. The park is currently a highly successful breeding habitat for protected wild birds and frogs. Construction works would destroy this.
8. **Air Quality** – The removal of so many trees would mean that the Woodland and Woodland Playground areas would in the future be far more polluted and less suitable for children to play in, even apart from issues arising during the construction works themselves.

9. **Cumulative Impacts on the Park** –There are also proposals to develop the Courtyards / Stables area beside the Castle itself. It is proposed that the entire ornamental pond area at the other side of the Courtyards will be turned into a car park. The combined effect of all of these incursions into the Park is just too much. The Park simply cannot take being chiselled away at any further. It is already so much smaller than it was. If constantly under attack, biodiversity will necessarily suffer.

Conclusion

The proposed substantial intrusion into 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.

Again, our view is that the bus corridor should terminate at the end of the Rathfarnham Village bypass (by the Butterfield Avenue junction). A signal controlled priority light would provide sufficient priority for the limited number of outbound buses which pass the Park. (There is already an inbound bus lane running alongside the Park). It is unnecessary and would be disastrous from an environmental perspective for the Woodland area to be sacrificed, as is proposed.

Yours faithfully,

Daria Sochacka . Wm McElinn

Daria Sochacka and William McElinn.