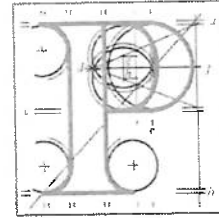


**Our Case Number:** ABP-316272-23

**Your Reference:** Anna Shanley and Ryan Stempniewicz



**An  
Bord  
Pleanála**

Hughes Planning & Development Consultants  
c/o Christopher Browne  
85 Merrion Square  
Dublin 2  
D02 FX60

**Date:** 24 April 2024

**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 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](mailto: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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64 Sráid Maoilbhride  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

## Kevin McGettigan

---

**From:** Eimear Reilly  
**Sent:** Monday 8 April 2024 12:36  
**To:** Kevin McGettigan  
**Subject:** FW: Bus Connects Submission 316272-23  
**Attachments:** FINAL Busconnects Response No 2 - 270324 CB.pdf; Appendix A - Letter from ABP Inviting Further Submissions on Bus Connects Templeogue Rathfarnham to City.pdf

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**From:** LAPS <laps@pleanala.ie>  
**Sent:** Thursday, March 28, 2024 9:57 AM  
**To:** Eimear Reilly <e.reilly@pleanala.ie>  
**Subject:** FW: Bus Connects Submission 316272-23

---

**From:** Bord <bord@pleanala.ie>  
**Sent:** Thursday, March 28, 2024 9:55 AM  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** FW: Bus Connects Submission 316272-23

---

**From:** Christopher Browne [REDACTED]  
**Sent:** Thursday, March 28, 2024 9:34 AM  
**To:** Bord <bord@pleanala.ie>  
**Subject:** Bus Connects Submission 316272-23

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Good morning,

I would like to submit the attached submission on the proposed Bus Connects route from Templeogue/ Rathfarnham to City Centre. Please see the attached report for further details.

Kind regards,

Christopher Browne  
Senior Planner

Hughes Planning & Development Consultants

85 Merrion Square,

Dublin 2  
D02 FX60

T 00 353 (0)1 539 0710



[W www.hpdc.ie](http://www.hpdc.ie)

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**HUGHES**  
**PLANNING**  
& DEVELOPMENT CONSULTANTS

# **Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme (Ref. No. 316272)**

## **Response to NTA Observations on the Proposed Scheme Submissions Case Number: ABP-316272-23**

**Submitted on Behalf of:**  
Anna Shanley and Ryan Stempniewicz,  
14 Terenure Road East, Dublin 6 (D06ET35)

**March 2024**

85 Merrion Square, Dublin 2, D02 FX60  
+353 (0)1 539 0710  
info@hpdc.ie  
www.hpdc.ie

## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been instructed by our clients, Anna Shanley and Ryan Stempniewicz, 14 Terenure Road East, Dublin 6 (D06ET35), to make this submission per the February 2024 invitation (Appendix A) by An Bord Pleanála (“ABP”) and in accordance with section 217B of the Planning and Development Act 2000, as amended, in relation to the submission dated 20<sup>th</sup> December 2023 from the National Transport Authority (“NTA”).

With reference to the relevant portion of the National Transport Authority’s observations (“NTA’s Response”), for the foregoing reasons the relocation of the existing bus stop from its present location adjacent to No. 34 Terenure Road East to the front of Nos. 12 and 14 Terenure Road East would have serious consequences for the safety, health and privacy of our clients, their family, the general public and local businesses operating in Rathgar.

## 2.0 No Road Safety Analysis

In response to our clients’ Objection regarding the serious safety concerns of moving the bus stop to the proposed location, the NTA states the following:

*In terms of safety, the safety implications of the Proposed Scheme have been assessed by an independent auditor as part of the Road Safety Audit carried out on the Proposed Scheme and included in Appendix M of the Preliminary Design Report provided in the Supplementary Information. It is noted that no concerns were raised relating to the arrangement at the proposed bus stop or layout of the adjacent Rathgar Road/Rathgar Avenue/Orwell Road/Highfield Road junctions. (See NTA Response p.182.)*

The Road Safety Audit included in Appendix M of the Preliminary Design Report (“Road Safety Audit”) referenced by the NTA in their Response does not address or reference the relocation of the bus stop. Nor does it evaluate vehicular traffic at the relevant junction. For the junction at issue, the Road Safety Audit only reviewed the issue of **insufficient space to accommodate pedestrians and cyclists safely at the junction**. (See *Road Safety Audit*, p. 5 problem 3.3.)

It is important to note that in November 2023 a new bus route, the S4 Route, has come into operation along Terenure Road East. The new route is a high-frequency bus route that provides 105 buses per day in each direction (210 in total), one every ten minutes. The new route does not factor into any road safety audits. The omission of this new bus route from the planning application is considered a serious flaw in the planning process and confirms that the proposed bus connects route and bus stop relocation has not been assessed correctly.

The relocation of the bus stop and the new S4 bus line are not examined in the Road Safety Audit relied upon by the NTA.

## 3.0 No Junction Analysis

In response to our clients’ Objection regarding the congestion issues the bus stop relocation will create, the NTA states the following:

*In terms of concerns around congestion at the junction, Page 37 of the Junction Design Report in Appendix A6.3 of the EIAR Volume 4 Part 2 of 4 presents the junction assessment results at the Rathgar Road / Highfield Road / Orwell Road / Terenure Rd East junction in each peak period where it is demonstrated that the junction will operate at capacity in each peak hour. However, it is noted that the junction will be safer for pedestrians and cyclists and ensure that buses have priority through the junction. (See NTA Response p.182.)*

The Junction Design Report in Appendix A6.3 of the NTA’s EIAR Volume 4 Part 2 of 4 (“Junction Analysis”) lists the changes made between each iteration of the Scheme. Between the third iteration of the Scheme and the final design submitted to ABP (during which this last-minute bus stop relocation became part of the Scheme), four changes are noted. The relocation of the bus stop is not listed as a

change despite inclusion in the final design and not examined in the Junction Analysis relied upon by the NTA. See *Junction Analysis* at p. 36.

Of note, even without the bus stop as part of the examination, the Junction Analysis states that in the proposed design the junction will operate **over capacity** and the average bus delay will be seventy-two (72) seconds inbound and fifty-eight (58) seconds outbound morning and evening. *Id.*

The Junction Analysis is considered to be a flawed document considering the omission of the bus stop relocation in its evaluation.

#### 4.0 Protected Structures

Nos. 12, 14 and 16 Terenure Road East are Protected structures. No. 12 Terenure Road East has historical railings that are also included in the record of protected structures. See *Objection* at pp. 14-17. It is directly in front of these protected railings that the Scheme seeks to construct a bus shelter. Currently, the bus stop location is in front of No. 34 Terenure Road East which is not a protected structure.

Moving a bus shelter from the front of an unprotected structure, to the front of a protected structure with protected railings is counter to all relevant conservation policies including, without limitation, the Dublin City Development Plan 2022-2028. See *Objection* at pp. 16-17.

In response to this portion of our clients' Objection, that NTA states:

*In terms of impact on heritage, the impact of the bus shelter on Architectural Heritage is considered in section 16.4.4.1 of Chapter 16 Architectural Heritage. (See NTA Response at p 183.)*

The referenced Chapter 16 Architectural Heritage report ("Architectural Heritage Report") notes that No. 12 Terenure Road East is a protected structure, but by accident or design the Architectural Heritage Report makes absolutely no mention of the protection afforded the front railings. The report also states that the predicted impact on the protected structure will be 'Indirect, Negative, Slight, Long-Term'. Given the proposed bus stop will be located directly in front of the railings, it is considered that the predicted impact should read as 'Direct, Negative, Very Significant, Long Term'.

Indeed, the Architectural Heritage Report's conclusions can only be reached if the protections afforded the historical railings are ignored.

#### 5.0 Impact of the S4 Line

In November 2023, after our clients' Objection was filed with ABP, the S4 bus line commenced operation as part of Phase 5b of the Bus Connects Network Redesign. The S4 differs from the other bus routes that run on Terenure Road East. Instead of continuing towards the city centre on Rathgar Road, the S4 must move to the right lane, and turn right crossing over Rathgar Road (and adjoining cycle lane) onto Highfield Road. Currently, with the bus stop located in front of No. 34 Terenure Road East, the S4 is not causing an issue as there is ample distance for the bus to move into the right lane ahead of the junction.

In the proposed Scheme, the new bus stop location will be in front of No. 12 Terenure Road East and use bus lights to allow for the S4 to move ahead of vehicular traffic. However, Rathgar Road and the adjoining cycle lane are heavily trafficked. Without a signal or stop sign, cars coming from Terenure Road East, Rathgar Ave and Orwell Road queue in the right lane of Rathgar Road waiting for an opening to cross the outbound traffic. The queue to cross Rathgar Road can handle only four cars at maximum. Once this threshold is met, all traffic waits on the opposite side of the junction for a space in the queue to open.



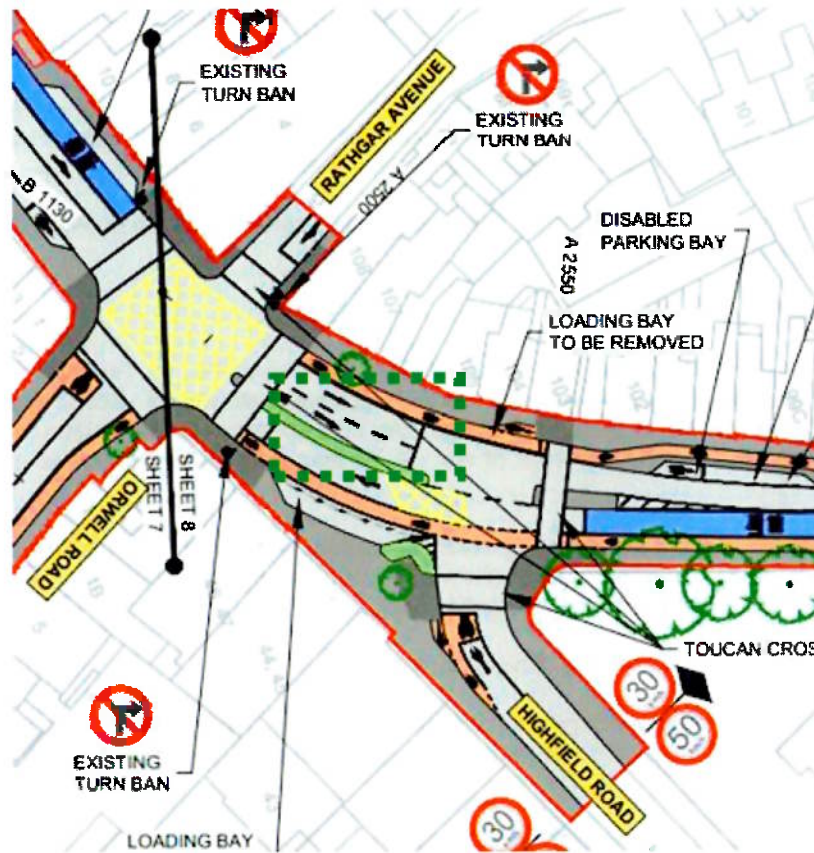


Figure 1.0 Extract from Sheet 11 of the General Arrangement drawing illustrating the intersection of Terenure Road East and Rathgar Avenue/Orwell Road and Highfield Road. Queue area for Highfield Road in green dashed line.

When the queue to turn on Highfield Road meets its four-car threshold, the S4 will sit idle in the bus lane blocking all bus traffic on Terenure Road East. Should there also be a car in the right lane waiting for a space in the Highfield Road queue, all inbound traffic on Terenure Road East will be blocked.

If the bus stop is retained at its current location, the S4 can continue to queue for Highfield Road in the right lane and the flow of bus traffic will continue unimpeded.

It is important to note that the S4 Bus Route does feature often in the accompanying documents and it is unclear whether the bus route formed part of traffic counts which were conducted in February 2020.

### 6.0 Vehicular Access and Road Blockage

The proposed bus stop location at No. 12 Terenure Road East will obstruct the entranceway to two residences, Nos. 16 and 14 Terenure Road East. Unlike the current bus stop location at No. 34 Terenure Road East, there is no bus lane opposite Nos. 12, 14 and 16 Terenure Road East.

In reference to this obstruction, the NTA states the following in their Response:

*Vehicular access will be retained to properties adjacent to the proposed bus stop, namely No. 14 Terenure Road East. While access may be intermittently prevented by a bus loading/unloading at the bus stop, these instances will be short-lived. (See NTA Response page 184.)*

Per the NTA's initial submission in Appendix H - Bus Stop Review, this proposed bus stop location will see thirty-one (31) stops per hour at peak times. Further, as the NTA notes in Figure 7.1 of Appendix H

- Bus Stop Review, each bus stop is to assume a one-minute dwell time. Thus, at peak times both Nos. 16 and 14 Terenure Road East are assumed to be obstructed thirty-one (31) minutes out of each hour. As noted in our clients' Objection, should any vehicle seeking to enter the front drive of Nos. 16 or 14 Terenure Road East be blocked by a loading bus in the left lane, the proposed single lane for all non-bus traffic in the right lane or both, that single vehicle will stop all outbound bus and vehicular traffic operating on Terenure Road East. See *Objection* at pp. 12-13.

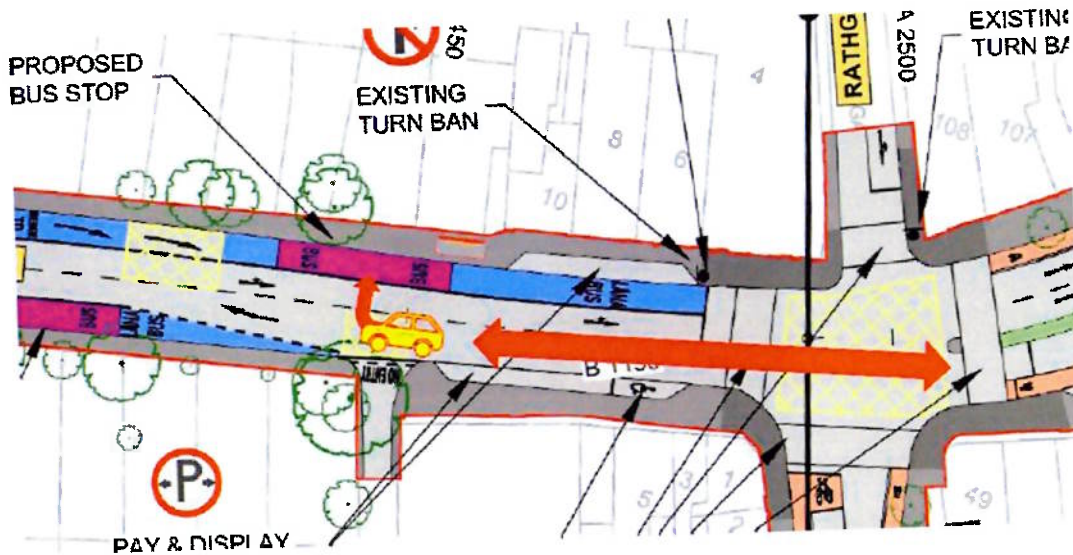


Figure 2.0 Extract from Sheet 7 showing the potential for traffic congestion affecting the junction to the west due to restricted access to the subject site

Unlike Figure 2.0 above, the existing bus stop location has a bus lane opposite it for outbound traffic:

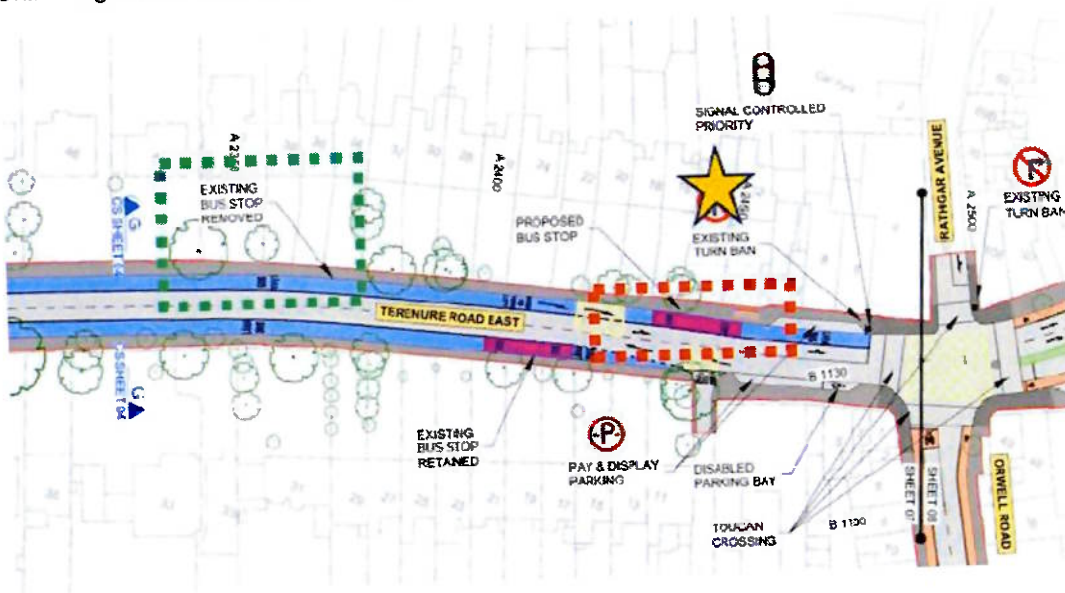


Figure 3.0 Extract from Sheet 10 of the General Arrangement drawing illustrating the existing stop which is to be relocated (green dashed line).

The proposed bus stop location obstructs the entrance to two residences, but the existing location obstructs only one. Should any vehicle seek to enter the single residence currently obstructed by a loading bus, outgoing bus traffic can continue on unaffected. The goal of Bus Connects is to improve



the flow of public transport through the city's streets. Moving the bus stop to the front of 12 Terenure Road East will have the opposite effect and will in fact restrict outbound traffic flows.

## 7.0 Minimise Distance Between Bus Stops

In our clients' Objection, we noted the impact relocating the bus stop would have on the distance between bus stops should the 1165 bus stop be relocated to the proposed location. In their Response, the NTA states the below:

*It facilitates better stop spacing with 415m between it and the prior stop, 350m between it and the subsequent bus stop – existing distance between stops is 367m (between stop 1164 and 1165) and 362m (between stop 1165 and 1166)  
(See NTA Response p. 183.)*

As detailed by the NTA above, currently the distance between the 1164 and the 1165 is 367m. The distance from the 1165 to the 1166 is 362m. These distances are nearly identical. Meaning, the 1165 bus stop is currently almost exactly equidistant from the 1164 and the 1166 – it is essentially the midway point in an ideal location. The total distance between the three locations is 729m. In the proposed location, the distance between the 1164 and the 1165 is now 415m. The distance from the 1165 to the 1166 is 350m. The 1165 is no longer the midway point between the 1164 and 1166 and the total distance between the three bus stops is 755m - a 26m increase.

It is the existing bus stop location that facilitates better bus stop spacing and complies with the NTA's own guidelines on bus stop locations

## 8.0 Local Businesses

As noted in our clients' Objection, the existing bus stop location has no impact on the ease of access to the local businesses of Rathgar. See *Objection at p. 7*. However, the proposed bus shelter location is to be constructed in between the front entrance gates of two Rathgar businesses with significant foot traffic.

The left gate of No. 12 Terenure Road is the entrance to The O'Brien Press, a general publisher of both adult and children's books. This is an active business with numerous staff, book deliveries and client meetings. The right gate is the entrance to the Studio 6 School of Music, physically located in No. 10a Terenure Road East but with a gated entrance connected to the protected railings of No. 12. Studio 6 School of Music offers instrumental lessons to people of all ages but with a large portion of the clientele being children - including our clients' child. It is here, directly in between the entrances of two local businesses (one of which the majority of the foot traffic will be children) that the NTA proposes to construct a bus shelter. The bus shelter and the significant volume of people that will use the multiple bus lines will obstruct the operation of these two businesses.

In their Response, the NTA ignores this portion of the Objection.

## 9.0 No Consultation

As noted in our clients' July 2023 submission ("Objection"), the proposed bus stop relocation to No. 12 Terenure Road East was not included in the prior iterations of the Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme ("Scheme") or part of any of the public consultations. See *Objection at p. 9*. The bus stop relocation was inserted into the fourth and final version of the Scheme submitted to ABP without consultation or notice of any kind to our clients or the residents of Rathgar. The NTA provides no explanation in their Response as to why it was not included in the three prior versions of the Scheme nor made part of the public consultations.

## 10.0 Previously Relocated

As noted in our clients' Objection and the objections from other residents of Rathgar, the bus stop was previously located where the NTA now seeks to move it. See *Objection at p. 9*. For the reasons noted in our clients' Objection, the bus stop was moved from this location to No. 34 Terenure Road East where it has operated without issue for decades. *Id.* In their Response, the NTA ignores our clients' Objection

regarding the history of the proposed bus stop location and the issues that caused its relocation to No. 34 Terenure Road East.

### 11.0 Conclusion

We ask that the Board consider the arguments presented in this submission and within our clients' initial Objection. For all the reasons presented, we ask that An Bord Pleanála sees fit to maintain the bus stop at its current location and not repeat historic issues along this stretch of road. Again, we also ask that the Board fully assesses how the village and its road network function daily, as the implications of the works will be far-reaching in terms of traffic safety, congestion and indeed the functionality of Rathgar village.

We trust that the Board will have regard to the contents of this submission in relation to the wider public consultation process on the Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme.



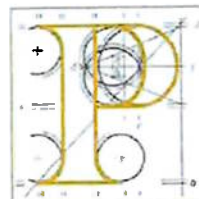
Kevin Hughes MIPI MRTPI  
Director for HPDC Ltd.

**Appendix A**

Copy of the letter issued by An Bord Pleanála inviting our clients to make another submission on the proposed Bus Connects scheme.

**Our Case Number:** ABP-316272-23

**Your Reference:** Anna Shanley and Ryan Stempniewicz



**An  
Bord  
Pleanála**

Hughes Planning & Development Consultants  
85 Merrion Square South  
Dublin 2  
D02 FX60

**Date:** 23 February 2024

**Re:** Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme  
Templeogue/Rathfarnham to City Centre

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above-mentioned road development application for approval under section 51(2) of the Roads Act, 1993, as amended.

The Board has considered the case and hereby notifies you that it has decided to determine the application without an oral hearing. In this regard, please be advised that the Board has absolute discretion to hold an oral hearing and has concluded that this case can be dealt with adequately through written procedure. Accordingly, the Board hereby considers it appropriate to invite you to make a submission in accordance with section 217B of the Planning and Development Act 2000, as amended, in relation to the submission dated 20th December 2023 received from the National Transport Authority. A copy of the submission can be found on the Board's website at [www.pleanala.ie/en-ie/case/316272](http://www.pleanala.ie/en-ie/case/316272) under the heading 'Responses'. This submission together with the application documentation is also available for public inspection at the following locations:

1. An Bord Pleanála, 64 Marlborough Street, Dublin 1
2. National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2

Any submission in relation to the above must be received by the Board within 5 weeks from the date of this letter (i.e. no later than 5:30p.m. on 28th March 2024). You may make your submission via email to [laps@pleanala.ie](mailto:laps@pleanala.ie), or by hand or post to the offices of the Board. No additional fee is required for making a submission. Please do not use the Board's online submission portal to make a submission, as the submission portal is for submissions that require a fee. As there are a number of Busconnects applications with the Board for approval, you are requested to provide the following in your submission, should you choose to make one:

- (a) The case reference number: ABP-316272-23
- (b) Your name and address,
- (c) The name and address of the person you are acting on behalf of (if applicable).

If you have any queries in relation to the matter, please contact the undersigned officer of the Board.

<b>Teil</b>	<b>Tel</b>	(01) 858 8100
<b>Glaao Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Webside</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
---------------------------------------------------------	-----------------------------------------------

Please quote the above-mentioned case reference number in any correspondence or telephone contact with An Bord Pleanála.

Yours faithfully,



Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

AA01

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Ríomhphost

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