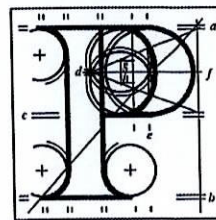


Our Case Number: ABP-316272-23

Planning Authority Reference Number:

Your Reference: Anna Shanley and Ryan Stempniewicz



**An
Bord
Pleanála**

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

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

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HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

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

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

August 2023

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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 a submission in respect of the Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme currently being planned by the National Transport Authority (NTA). Our clients live along the proposed bus corridor and as such wish to make this submission. This submission is accompanied by the relevant submission fee (€50).

This submission is made in response to a public notice, available at <https://templeoguerathfarnhamscheme.ie>, inviting submissions, up until 20th June 2023 as part of a public consultation process into the bus route corridor (Ref. No. 316272). A subsequent notice was published extending the timeline until the **15th of August 2023** as shown in Appendix A of this report. The purpose of this submission is to outline our client's concerns in relation to the relocation of an existing bus stop to the front of their property which is a protected structure. We note extracts of the map which presents the location of the bus route corridor, relative to our client's site, as presented in Figure 1.0, below. It should be noted from the outset that the bus stops (inbound and outbound) were moved to their current location **from** the proposed location approximately 37 years ago due to traffic congestion issues at the junction. It is, therefore, regressive to relocate the bus stop to a problematic location.

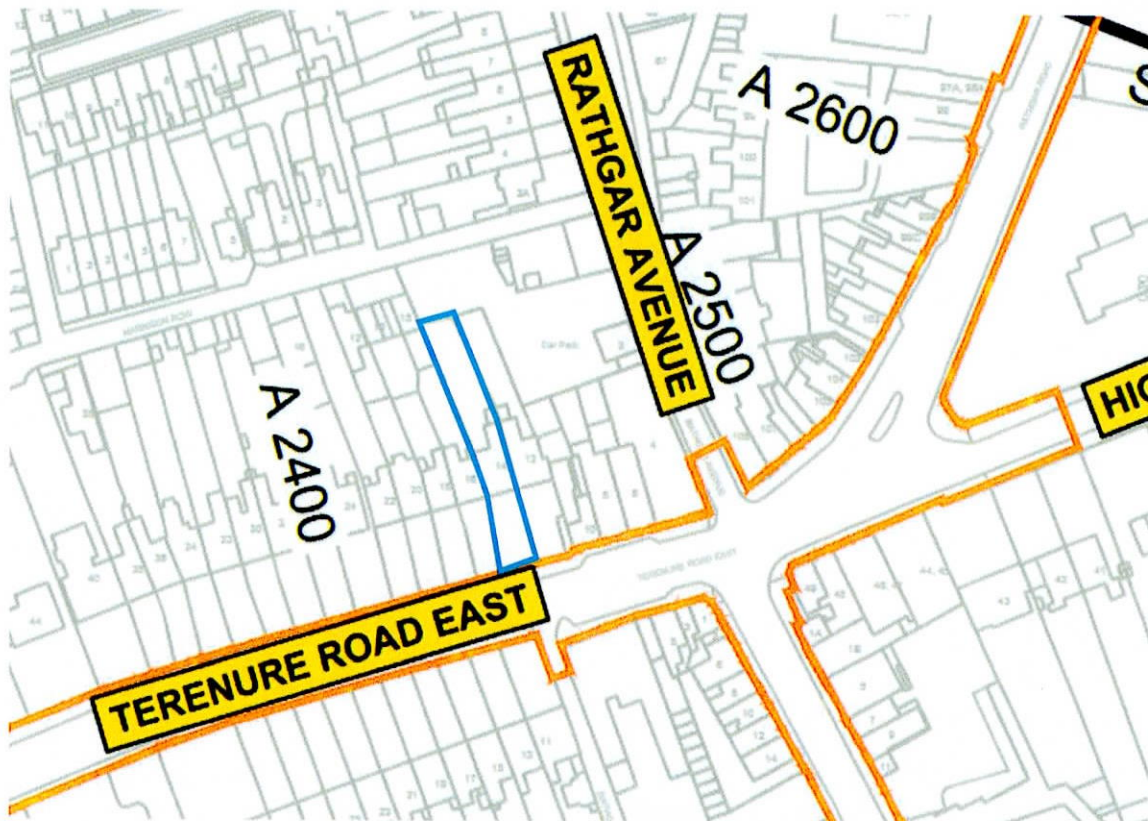


Figure 1.0 Extract from the proposed scheme boundary illustrating the location of our client's site (blue outline) relative to the intended route option.

As will be discussed in the following sections of this report, the relocation of the existing bus stop 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 and the general public. Not to mention the impact this will have on local businesses operating in the village with reduced capacity for deliveries.

2.0 Subject Site

The site to which this submission pertains is located on the northern side of Terenure Road East next to Rathgar village. The site comprises a three-storey residential dwelling with front and rear gardens. The site presents significant frontage (c. 9m) to Terenure Road East with access provided for multiple cars.



Figure 2.0 Imagery of the subject site at 14 Terenure Road East which is accessed via a 3.22m wide entrance.



Figure 3.0 Imagery of the subject site at 14 Terenure Road East and the existing bus stop (red outline) located c. 70m to the west.

Rathgar Village and surrounding streets are characterised by period architecture and stands of mature trees lining streets and gardens. The village contains a range of shops and services including sensitive services such as schools, creches and medical facilities.

The village is dense and compact with many services and amenities within walking and cycling distance for local residents. This is particularly evident during the school term as pupils walk and cycle to and from the local schools. This village feel is often a deciding factor for families purchasing dwellings in the area.

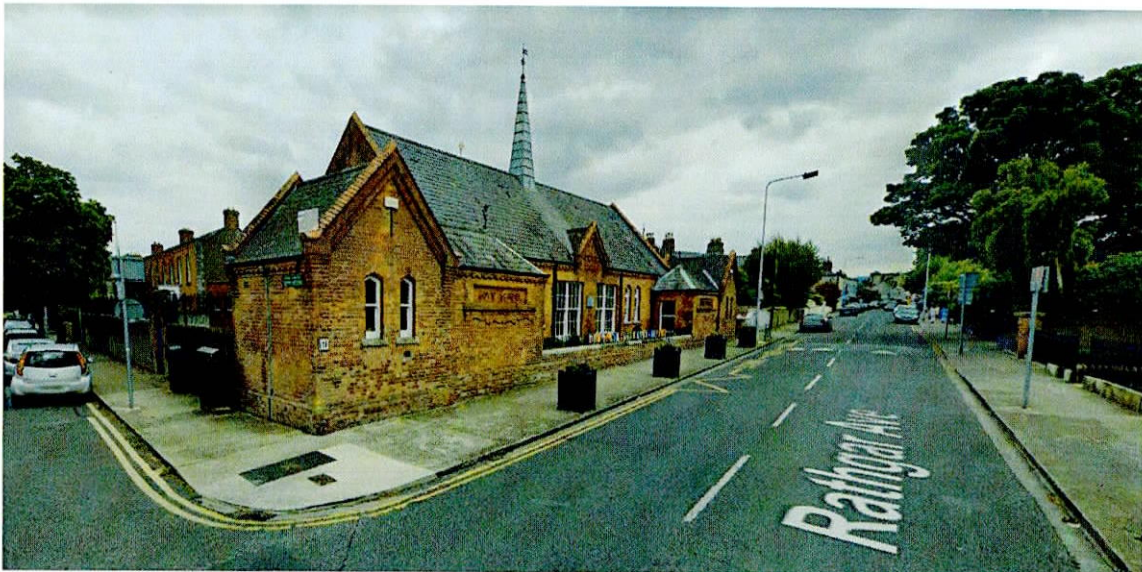


Figure 4.0 Image of Rathgar National School located north of the village and one of several schools in the immediate area. Many pupils live locally and walk to and from school each day.



Figure 5.0 Image of Rathgar village which is characterised by its period architecture and mature tree-lined streets and gardens.

Before purchasing the house, our clients viewed several properties along the street, one of which was No. 34 Terenure Road East. This property was ruled out due to the bus stop located at the front of the property which prevents vehicular access and can be considered a hazard in terms of traffic safety, noise pollution and air pollution. As such, when No. 14 Terenure Road East was listed for sale, our clients were enthused by the property which included vehicular access and was located at a sufficient distance from the bus stop, thus ensuring no buses constantly stopping outside and safe sightlines for merging onto the road. It should be noted that the entrance to the property was reflected in the value of the property as some dwellings along this street do not have the same access arrangements.



Figure 6.0 Imagery of the existing bus stop at 34 Terenure Road East.



Figure 7.0 Imagery of the proposed bus stop location at No. 12 Terenure Road East – a protected structure. The bus stop is to be located in front of the original protected railings blocked by vans in the image above in an area used by the village shops for deliveries (as evident above and discussed further within).

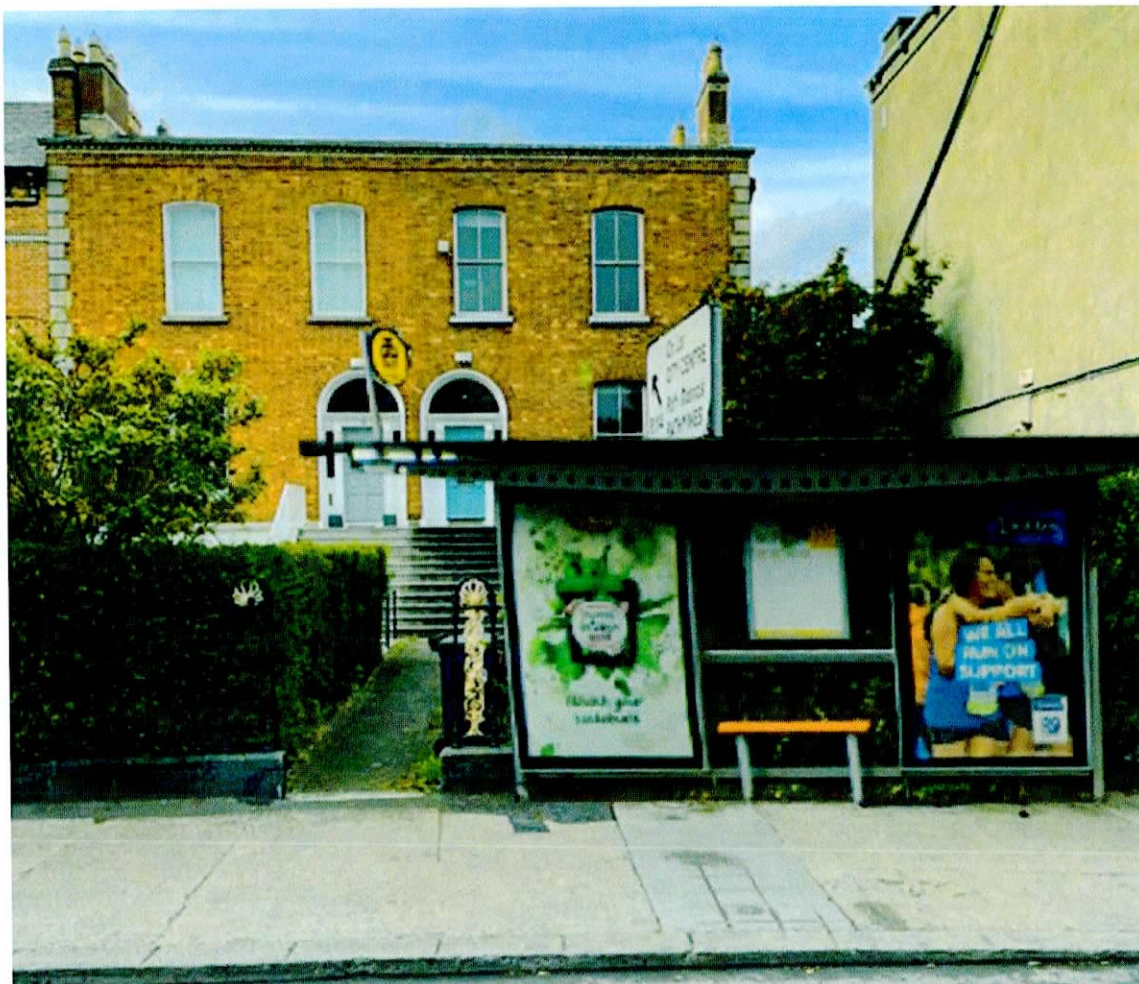


Figure 8.0 Indicative image of how the bus stop will look at this location.

3.0 Bus Connects Proposal Relative to Subject Site

As per the documentation available at <https://templeoquerathfarnhamscheme.ie>, the Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme proposes the instalment of a bus corridor running from west to east along Terenure Road East towards the city centre. As part of the works, it is proposed to relocate an existing bus stop adjacent to No. 34 Terenure Road East to the front of No. 12 Terenure Road East, adjacent to No. 14 Terenure Road East, the home of our clients.

It is noted that the bus stop was not moved to the front of No. 12 Terenure Road East in all previous iterations of the design. Therefore, it was most surprising for our clients to discover it had been relocated in the final design and as such, they feel let down by the consultation process thus far.

The bus stop, as identified in Figures 9-10.0 overleaf, will be in permanent operation and will result in excess traffic building up outside the property as well as in the village centre which contains a major junction at Terenure Road East and Orwell Road. This will affect our client's ability to freely access their property via car, thus reducing their amenity in contravention of zoning objectives for the site. Given the residential nature of the property, the increase in diesel buses stopping outside the property will greatly affect the amenity of the residents by resulting in excessive air and noise pollution, as well as creating a traffic hazard for anyone entering or exiting the site.

Further, the new bus stop shelter will be bookended by the access gates of two local businesses to the east, The O'Brien Press and Studio 6 School of Music (a children's music school), in a location directly adjacent to where the footpath narrows. This, combined with the nature of the intersection in which the right-hand lane is used for access to Highfield Road (and not to continue north into Rathmines), creates

both a pedestrian and vehicle pinch point. In addition, the footpath in front of No. 12 Terenure Road East is used by all of the local businesses as a loading bay for deliveries. As discussed further within, placing a bus stop in this location raises a risk of serious injury given the size and frequency of the delivery vehicles using the location. It is considered that the relocated bus stop and resulting hazard will deter people, particularly vulnerable people such as children and elderly people, from walking into the village, thus regressing the city's push for an increase in active travel.

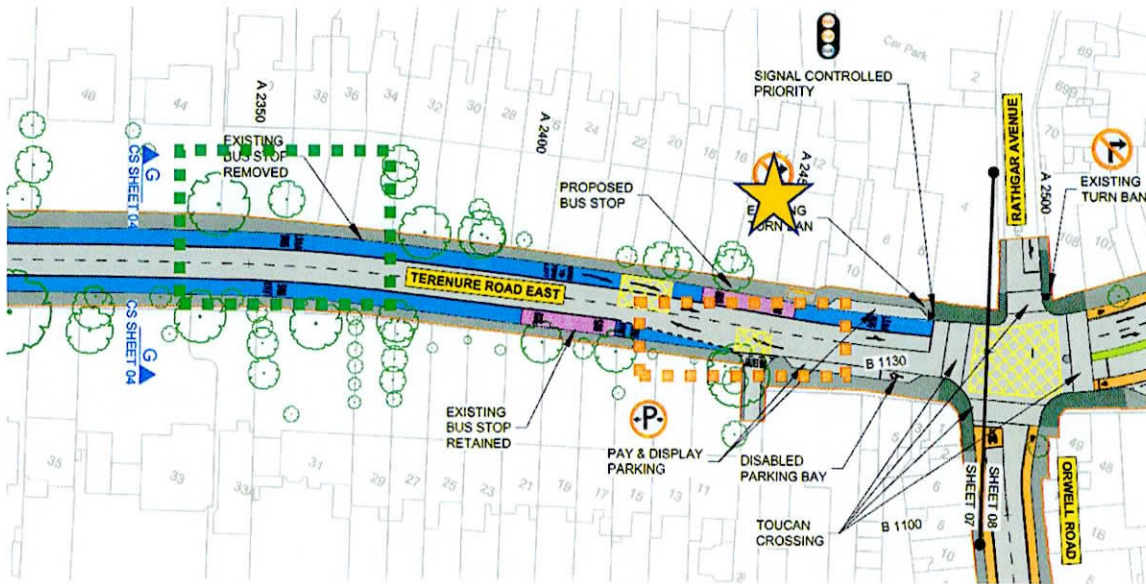


Figure 9.0 Extract from Sheet 7 of the General Arrangement drawing illustrating the proposed bus stop (red dashed line) adjacent to our client's property at No. 14 Terenure Road East and the location of the existing stop which is to be relocated (green dashed line).

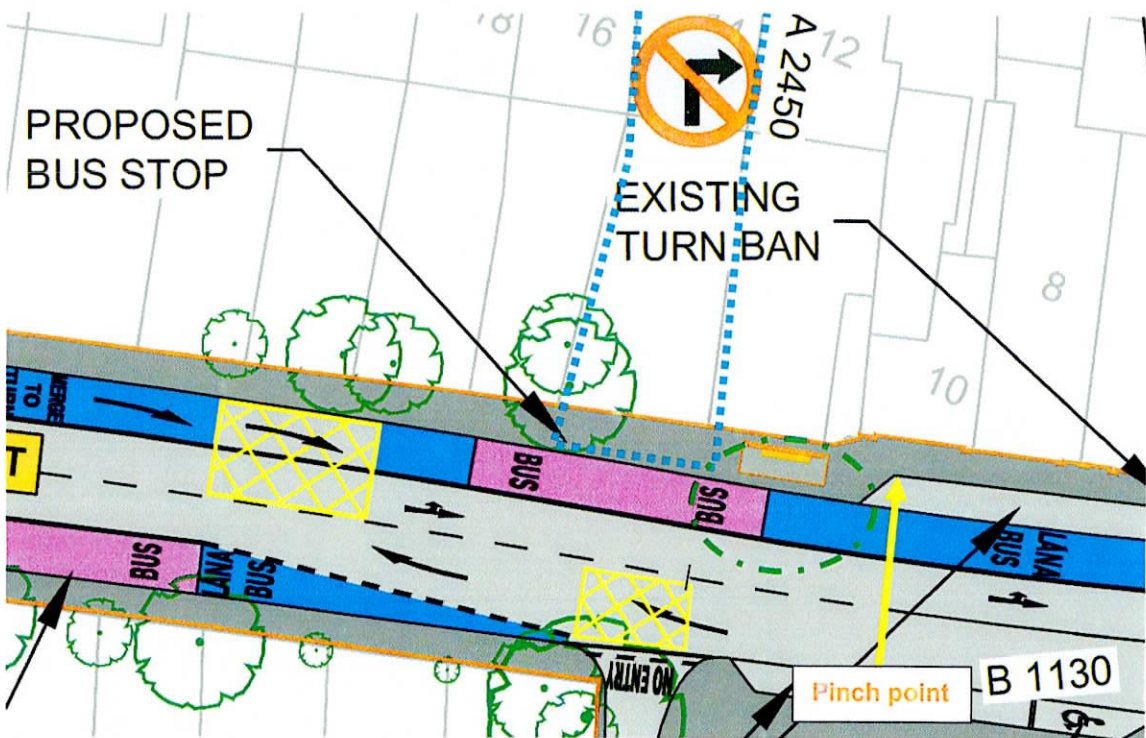


Figure 10.0 Extract from Sheet 7 of the General Arrangement drawing illustrating the proposed bus stop (green dashed line) relative to our client's site (blue dashed line). Note how the bus shelter will worsen an existing pinch point in the footpath.

4.0 Lack of Consultation

Starting in November 2018, the National Transport Authority (NTA) began its first round of public consultation on initial proposals for the sixteen core bus corridors including the Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme. At this time and during the following years, our clients and their neighbours participated in the consultations, providing submissions and attending individual in-person meetings. Two iterations of the scheme were created and made available to the public for review. Neither of these publications included moving the existing bus stop from No. 34 Terenure Road East to the front gate of No. 12 Terenure Road East. Indeed, ***no notice has ever been provided*** to the owners of No. 12 Terenure Road East, No. 14 Terenure Road East or No. 16 Terenure Road East that the bus stop would be moved. Only upon viewing the documents submitted to An Bord Pleanála did our clients and the residents of Rathgar become aware that such a move was being contemplated.

As a result of the last-minute alteration of the Scheme, there has been no consultation with our clients or any local residents in respect of the proposed relocation of the bus stop.

As will be evident from the content of this submission, the selection of the new location for the bus stop appears to have been undertaken by the NTA on the basis of a “desktop” analysis and without regard to the major difficulties the proposed relocation will cause for the community of Rathgar.

If the NTA had included the proposed relocation of the bus stop within the prior versions of the scheme, they would have learned that the bus stops (inbound and outbound) were moved to their current location ***from*** the proposed location approximately 37 years ago. Local knowledge is key to understanding how the road network operates in Rathgar, which contains awkward junctions.

Case-in-point, we have been informed by our clients that the bus stops on both sides of Terenure Road East heading to and from the city centre used to be located near the centre of Rathgar village. Due to both road and foot traffic congestion issues caused by the village centre location, the NTA/predecessor organization moved the bus stop to its current location at No. 34 Terenure Road East to alleviate the congestion burden. To relocate the bus stop from its existing position at No. 34 closer to the village would be regressive and counterproductive, resulting in issues that were addressed some 37 years ago.

5.0 Impact of Bus Connects Proposal on Subject Site

As stated previously, the relocation of the existing bus stop to the front of our client’s property will negatively impact the amenity, safety, and privacy currently enjoyed by our clients. The following sections of this report will expand upon the negative impacts which will be experienced by our clients as a result of the Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme and in particular, the relocation of an existing bus stop to the front of their home.

It should be noted that the client has engaged with the planning process since its inception. Plans for the scheme were published twice for public review, and on both occasions, the bus stop was not proposed for relocation. The submitted documents claim that some bus stops are being relocated to provide better access for passengers, however, it is submitted that this relocation is not in the best interest of passengers, residents, local businesses or other vehicle users in the area.

5.1 Congestion

The NTA’s submission regarding their methodology for choosing bus stop locations indicates a preference for bus stops to be located immediately before or immediately after a junction. However, the junction in question here is not your typical intersection and is wholly unsuited for a bus stop.

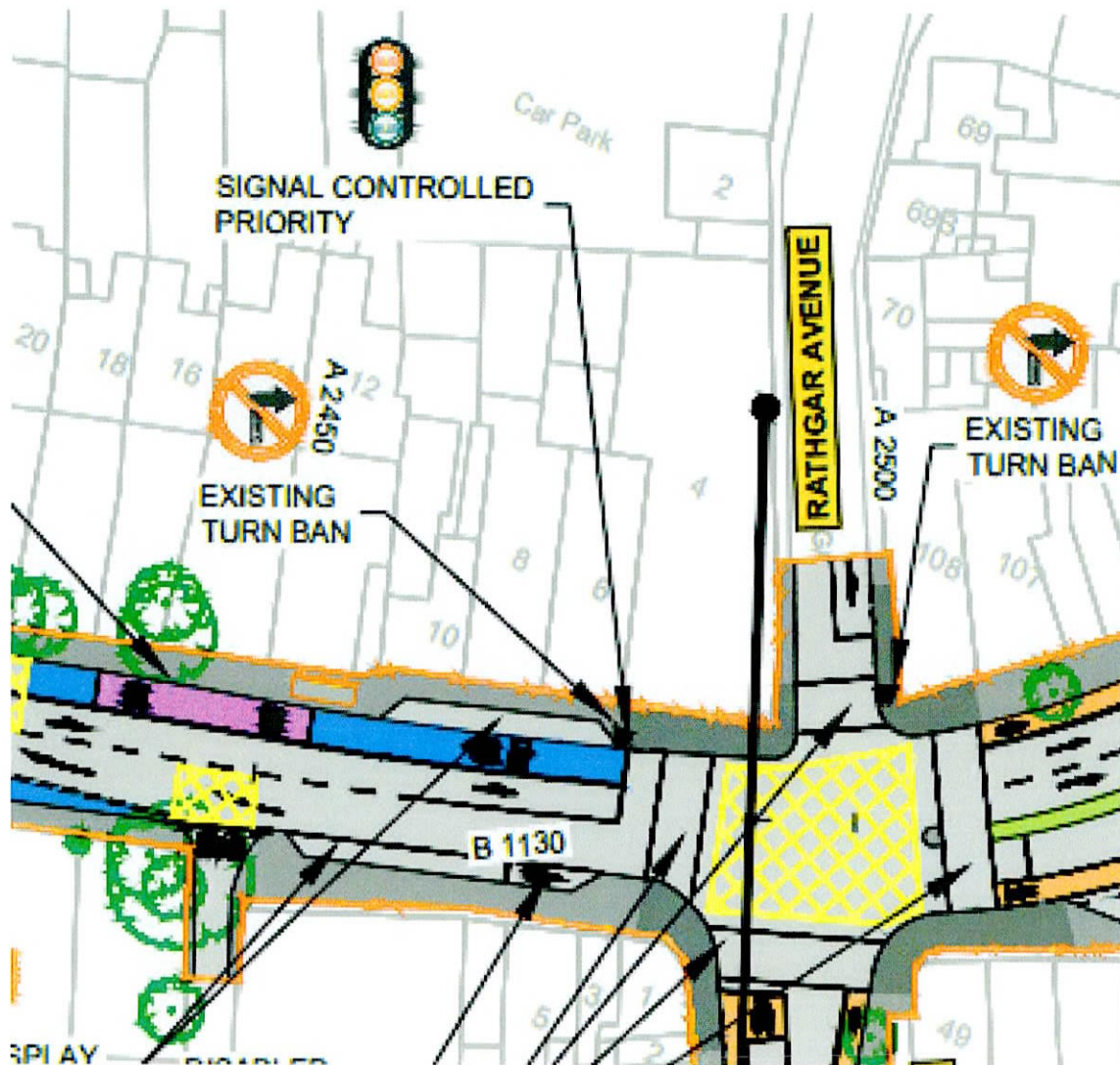


Figure 11.0 Extract from Sheet 10 of the General Arrangement drawing illustrating the intersection of Terenure Road East and Rathgar Avenue/Orwell Road.

Unlike a normal two-lane intersection, the right-hand lane of Terenure Road East at the junction of Terenure Road East and Rathgar Avenue/Orwell Road is not used to continue straight on. The image above shows the lane continuing. However, as the image below displays, the right-hand lane is used by those seeking to cross over the Rathgar Road and turn right onto Highfield Road.

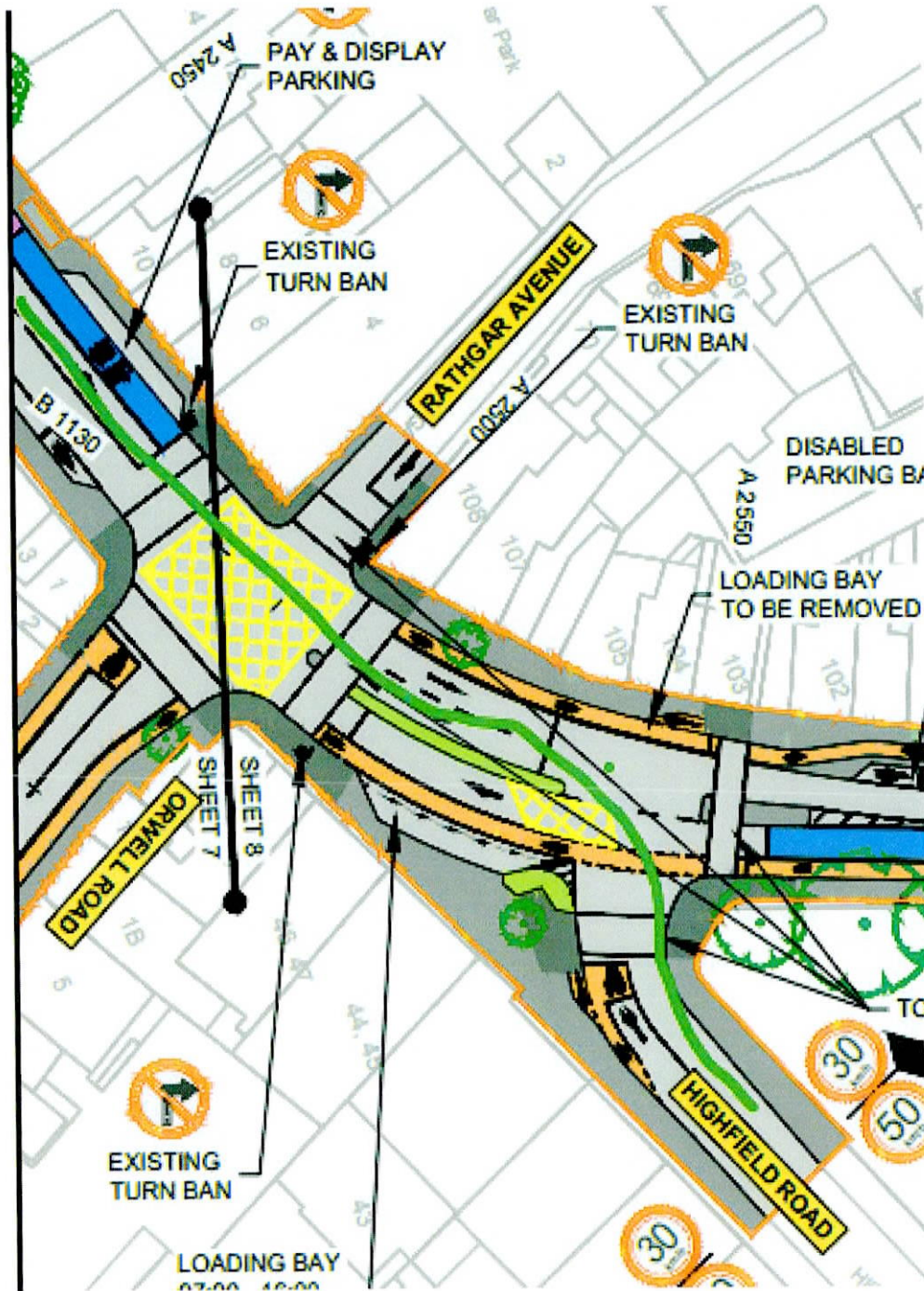


Figure 12.0 Extract from Sheet 11 of the General Arrangement drawing illustrating the intersection of Terenure Road East and Rathgar Avenue/Orwell Road and Highfield Road.

As the right lane of Terenure Road East crosses Rathgar Avenue/Orwell Road, there is space for approximately three or four vehicles before the Highfield Road turn. As Rathgar Road is very busy, especially during peak hours, cars are regularly backed up waiting to make the turn. Once the three to four car space limit is reached, all remaining cars that intend to turn onto Highfield Road stop before the Rathgar Avenue/Orwell Road junction to avoid blocking the intersection. Currently, this does not cause much of an issue as it is the *left-hand lane* that is used for cars seeking to continue up Rathgar Road or to turn left onto Rathgar Avenue. However, should the bus stop be moved to the new proposed location that would no longer be possible (as can be seen in the image below). Indeed, under the proposed plan, when three or more cars are waiting to turn onto Highroad Road stop before the junction,

the backup will run alongside the bus stop with the result that every time a bus stops at the proposed location **all traffic** on Terenure Road East heading into the city centre will be completely stopped during loading and unloading.

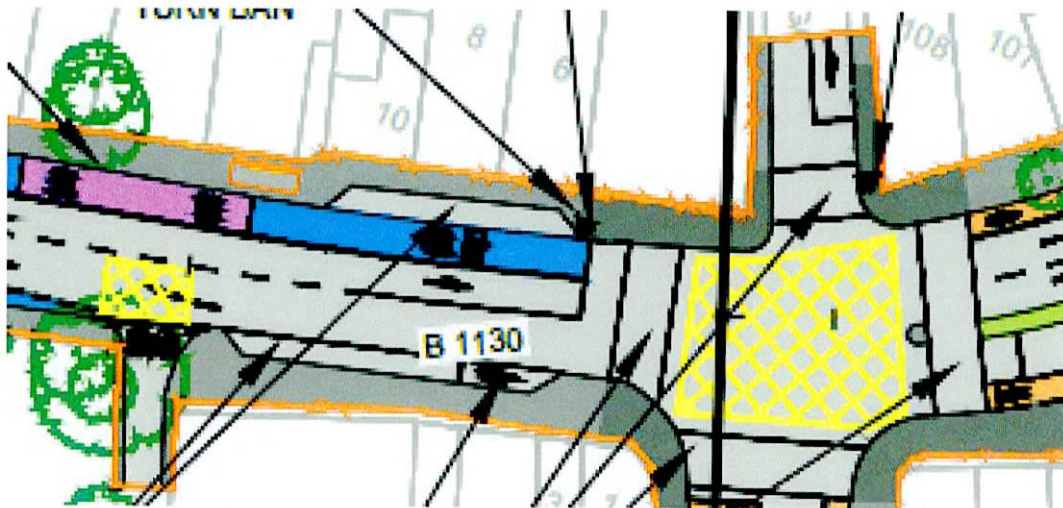


Figure 13.0 Extract from Sheet 10 of the General Arrangement drawing illustrating the new bus shelter and stop (in pink) and the intersection of Terenure Road East and Rathgar Avenue/Orwell Road.

This will have a very significant impact when one considers that per the NTA's submission in Appendix H - Bus Stop Review, this bus stop will see 31 stops per hour at peak times. Further, as noted in Figure 7.1 of Appendix H - Bus Stop Review each bus stop is to assume a one-minute dwell time. On that assumption, the left-hand lane of Terenure Road East will be stopped more than it is open at peak hours.

As noted above, this is not a new issue. Recognizing that the right-hand land was for turning and the left-hand lane flow of traffic was being blocked, the bus stop was moved to its current location at No. 34 Terenure Road East almost 40 years ago as seen below.

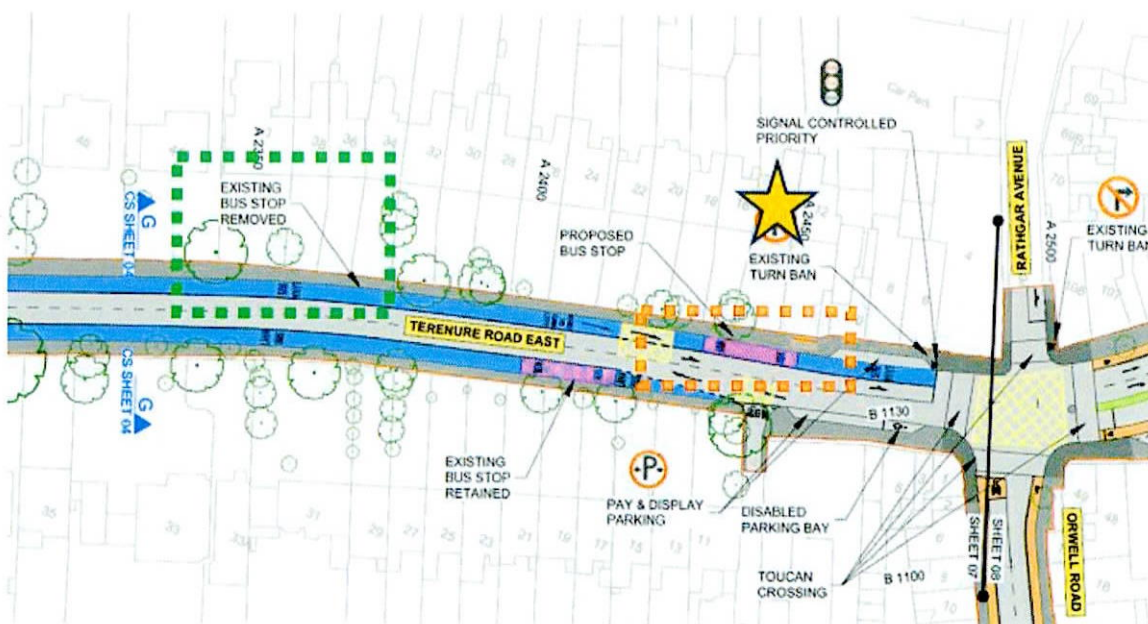


Figure 14.0 Extract from Sheet 10 of the General Arrangement drawing illustrating the existing stop which is to be relocated (green dashed line).

By leaving the bus stop in its existing location away from the intersection, the blockage that will be caused by cars seeking to turn right on Highfield Road is eliminated as there is ample room for those seeking to continue straight on or to turn left to pass any loading bus, get into the left lane and proceed.

5.2 Access and Traffic

When purchasing their home, our clients had a number of criteria to fulfil, and viewed several properties in the area and along Terenure Road East. One of those criteria was safe vehicular and pedestrian access to the street. They ruled out another house further down the street as there was a bus stop outside the dwelling which impeded sightlines and tended to be congested with multiple buses stopped at once blocking access. This is why they subsequently purchased No. 14 as it had a safe entrance to the dwelling from the street which was adequately situated a safe distance from the bus stop.

It is considered that the relocation of the bus stop to the front of their property will impede access to the site. As noted in the documents submitted with the application, the NTA anticipates c. 30 buses per hour potentially stopping outside the site, resulting in traffic congestion, air pollution from diesel fumes and restricted access.

If access is restricted for our clients, then it is likely to have an impact on traffic moving in the non-bus lanes, particularly when travelling from east to west. If a car is stopped for a prolonged period of time awaiting access to the subject site, particularly at rush hour in the evening, then a build-up could occur, thus blocking the major junction with Orwell Road and Rathgar Avenue and restricting access to the bus lane for buses travelling westward. There is also a risk, that if a car is leaving the subject site, it may be forced to wait in the bus lane whilst trying to gain access to the car lanes, thus potentially restricting the bus corridor.

It is also considered that sightlines may be reduced particularly during busy periods with multiple people waiting at the bus stop. Given the volume of buses proposed along the route and the volume of other traffic, it is considered hazardous to propose any development which may affect the existing sightlines.

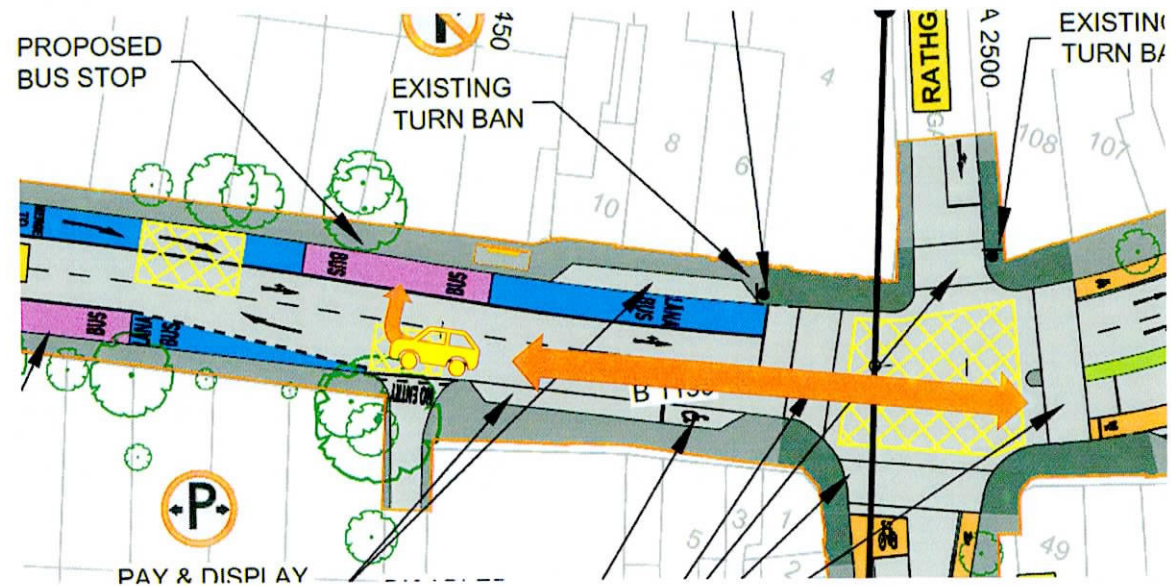


Figure 15.0 Extract from Sheet 7 showing the potential for traffic congestion affecting the junction to the west due to restricted access to the subject site

As noted above, the proposed bus corridor will run adjacent to existing car parking spaces which serve businesses in the village. Given the proximity to the junction, it is considered that the opportunity for collisions between cars leaving and entering the spaces and buses will increase. There is also a risk that vehicles leaving the spaces will block the bus lane if traffic lights are red, thus delaying the bus services along the route.

In addition, to the above, it is also noted that the plans proposed to remove the loading bay in the village to facilitate a bus lane. This loading bay serves all businesses in the area and if removed will further add to the congestion as lorries and delivery vans will need to park in the bus lane or some other inconvenient location including footpaths. The removal of the bay will also ensure that unloading continues in front of No. 12 and will even escalate, causing further problems for traffic flows in the area and reducing safety for vulnerable road users such as pedestrians and cyclists. The loading bay must be preserved to ensure a smooth flow of traffic through the village and ensure pedestrian safety.

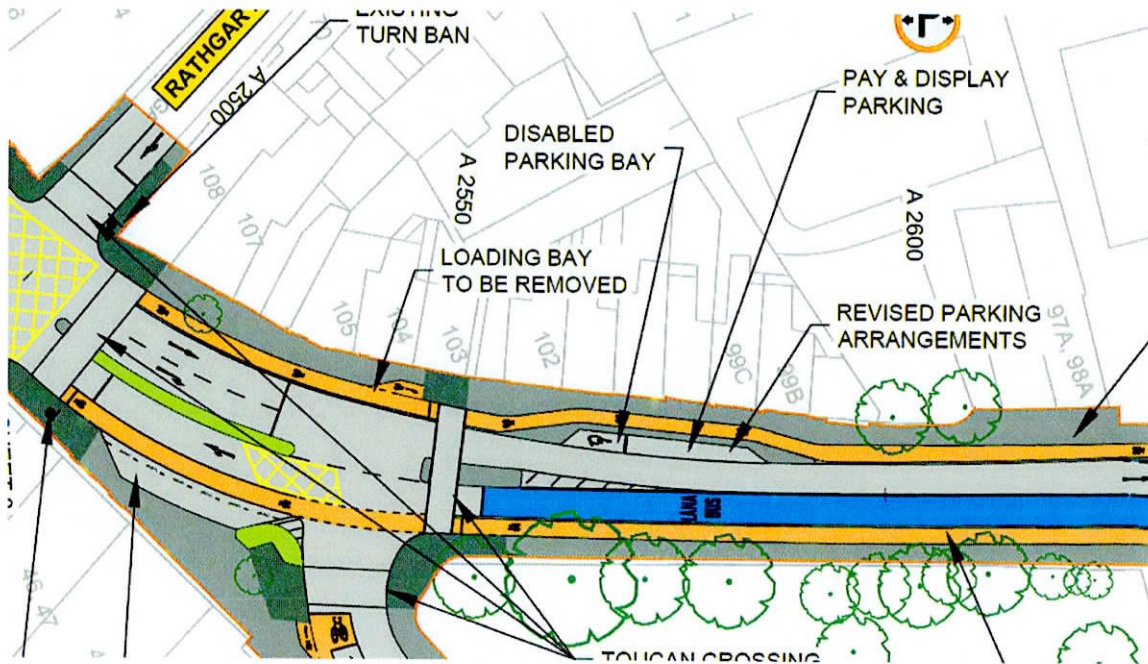


Figure 16.0 Extract from Sheet 8 showing the removal of the loading bay which will result in traffic congestion affecting the village

5.3 Impact on Built Heritage

The proposed relocation of the bus stop impedes access to No. 12 Terenure Road East as the proposed bus stop structure will run along most of the boundary fence, preventing any widening of the access. The proposal will also impede upon the character of the house and curtilage, which is a protected structure in the Record of Protected Structures which form part of the Dublin City Development Plan 2022-2028 (RPS. Ref. 8063). No. 12 has retained the original fence and this is specifically listed in the Record of Protected Structures as shown below. The relocation of the bus stop would have disastrous consequences for the protection of this property as shown in Figure 19.0 overleaf. This fence will no longer be visible once the bus stop has been erected and will contravene the development plan which seeks to protect protected structures and their curtilage.

It is noted that No. 34, where the bus stop is currently located, is not a protected structure as shown in Figure 18.0 overleaf.

8061	9	Terenure Road East, Dublin 6	Dublin 6	Allied Irish Bank, Rathgar
8062	11	Terenure Road East, Dublin 6	Dublin 6	House
8063	12	Terenure Road East, Dublin 6	Dublin 6	House, including railings
8064	13	Terenure Road East, Dublin 6	Dublin 6	House
8065	14	Terenure Road East, Dublin 6	Dublin 6	House
8066	15	Terenure Road East, Dublin 6	Dublin 6	House
8067	16	Terenure Road East, Dublin 6	Dublin 6	House, including railings
8068	17	Terenure Road East, Dublin 6	Dublin 6	House
8069	18	Terenure Road East, Dublin 6	Dublin 6	House, including railings
8070	19	Terenure Road East, Dublin 6	Dublin 6	House
8071	20	Terenure Road East, Dublin 6	Dublin 6	House, including railings
8072	21	Terenure Road East, Dublin 6	Dublin 6	House

Figure 17.0 No. 12 Terenure Road East is listed on the Record of Protected Structures. Note how it is one of few properties which also has a protected railing.

8081	30	Terenure Road East, Dublin 6	Dublin 6	House
8082	31	Terenure Road East, Dublin 6	Dublin 6	Dunlewy House
8083	33	Terenure Road East, Dublin 6	Dublin 6	Hopeton
8084	35	Terenure Road East, Dublin 6	Dublin 6	Clevedon
8085	36	Terenure Road East, Dublin 6	Dublin 6	House
8086	37	Terenure Road East, Dublin 6	Dublin 6	House
8087	38	Terenure Road East, Dublin 6	Dublin 6	House

Figure 18.0 No. 34 Terenure Road East is not listed on the Record of Protected Structures.



Figure 19.0 CGI image (above) showing the proposed bus stop adjacent to Nos. 12 and 14 Terenure Road East compared to the existing scenario. The bus stop will seriously detract from the protected structure and its curtilage which is also listed for protection.

As shown in Figure 19.0, the relocation of the bus stop would seriously detract from the amenity and character of No. 12 Terenure Road East which is a handsome two-storey over lower ground floor, red brick dwelling dating back to the 1800s. It is therefore considered that the proposed relocation of the bus stop will contravene Policy BHA2 of the development plan which states:

That development will conserve and enhance protected structures and their curtilage and will:

*(c) Ensure that the form and structural integrity of the protected structure is retained in any redevelopment and ensure that new development does **not adversely impact the curtilage** or the special character of the protected structure.*

*(f) Protect and retain important elements of built heritage including historic gardens, stone walls, **entrance gates and piers and any other associated curtilage features.***

(g) Ensure historic landscapes, gardens and trees (are in good condition) associated with protected structures are protected from inappropriate development.

It is evident that the relocation of the existing bus stop from the front of a property which is not a protected structure to the front of a protected structure is in clear contravention of the Dublin City Development Plan 2022-2028. In the interest of protecting the architectural heritage of the city and Rathgar, the bus stop must be retained at its current location which is c. 70 m to the west of the site.

5.4 Noise

Increased noise levels are considered to represent a direct impact arising as a result of the subject scheme. In this regard, it is unclear whether internal and external noise levels at our client’s property will remain compliant with the relevant standards set out in BS 8233:2014 ‘Guidance on Sound Insulation and Noise Reduction for Buildings’ and the associated provisions of both ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise New Residential Development (2017) and the Dublin Agglomeration Environmental Noise Action Plan (2018 – 2023).

The key objective of the Noise Action Plan is to avoid, prevent and reduce where necessary on a prioritised basis the harmful effects including annoyance due to long-term exposure to environmental noise. Noise is characterised as ‘unwanted sound’ or ‘sound that is loud, unpleasant or unexpected’ and that can eventually cause a disturbance, impairment or damage to health.

Activity	Location	07:00 to 23:00 Hrs	23:00 to 07:00 Hrs
Resting	Living Room	35 dB LAeq, 16 hour	-
Dining	Dining Room/Area	35 dB LAeq, 16 hour	-
Sleeping (daytime resting)	Bedroom	35 dB LAeq, 16 hour	30 dB LAeq, 8 hour
Working	Office	40 dB LAeq, 16 hour	-

Figure 20.0 Internal noise criteria for commercial and residential buildings as set out in BS 8233:2014.

Desirable & Undesirable Sound Levels for External Amenity Spaces	
Desirable	Undesirable
< 50 dB(A) L _{night}	> 55 dB(A) L _{night}
< 55 dB(A) L _{day}	> 70 dB(A) L _{day}

Figure 21.0 Desirable and undesirable sound levels for external amenity spaces as per the Dublin Agglomeration Noise Action Plan 2018 – 2023.

As stated previously, the relocated bus stop will be situated directly in front of our client’s property. This will increase noise levels at the location as buses stop for passengers. This factor, in conjunction with noise levels from other forms of transport on this busy stretch of road, will result in a permanently heightened noise impact to which, in the absence of a dedicated and site-specific comparative noise

assessment, the rise in noise levels relative to the long-standing situation on site cannot be predetermined.

Chapter 9 of the EIAR states that the provision of new bus stops will have a negative, long-term but insignificant effect on noise levels. However, as stated previously, without proper assessments being conducted, it cannot be predetermined.

The EIAR also notes that the current bus fleet is expected to transition to electric and hybrid between the year of opening and the design year. This statement offers little comfort to those living along the proposed bus route given the revelations of late that 134 no. new electric buses are currently lying idle in storage because of a lack of electric charging infrastructure. The NTA claims that the buses will be in use by the end of 2024, however, given the delays experienced thus far, it is conceivable that further delays could be expected.

In any case, it is considered reasonable to assume that existing noise levels arising due to the site's proximity to the relocated bus stop will be exacerbated to a degree that could compromise the health and well-being of our client and we would ask that this be taken into account.

5.5 Air Pollution

It is noted that the large majority of the Dublin Bus fleet comprises diesel vehicles which emit large quantities of carbon monoxide-CO, hydrocarbons-HC, particulate matter-PM and nitrogen oxides-NO_x, all of which are harmful to human health. Bus Connects seeks to increase bus services along its corridors which will ultimately lead to an increase in these toxic gases in residential streets. This will be particularly noticeable at bus stops where buses may linger for periods waiting for passengers to disembark or board.

As noted in Chapter 7 of the EIAR, the NTA claims that the residual effects as a result of the Proposed Scheme's operation are neutral and long-term. In part, they claim that advancement in engine technologies and the transition to electric buses will assist in improving air quality along the route. However, as noted previously, there are currently 134 no. electric buses are unable to operate due to a lack of infrastructure for charging vehicles. Therefore, any claims that the air quality will only be affected in the short term are unfounded, as government agencies, particularly in transport, have been plagued by delays in rolling out the infrastructure required to enable the transition to electric vehicles.

5.6 Development Plan Policy

Having regard to the previous sections of this report, it is considered clear to see that the subject proposal will compromise the residential amenity of our client. In this respect, we would note that our client's site is zoned Z2 'Residential Neighbourhoods – Conservation Areas' under the Dublin City Development Plan 2022-2028. This zoning provides the following objective which must be considered for any development on/adjoining such sites:

To protect and/or improve the amenities of residential conservation areas.

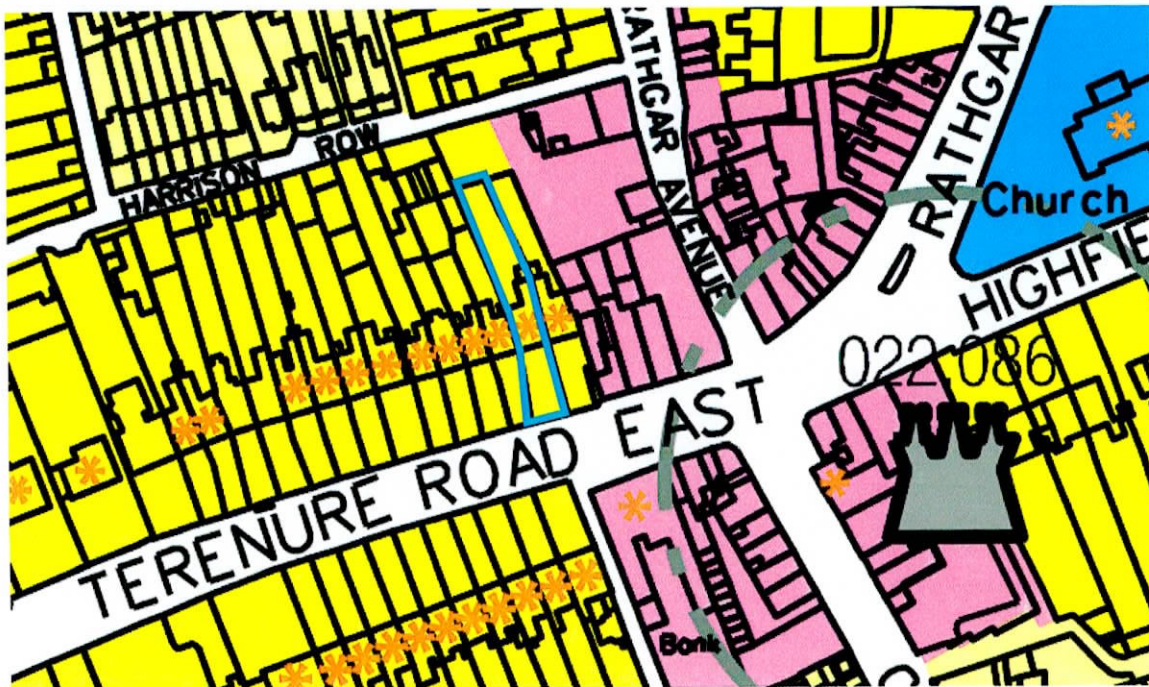


Figure 22.0 Extract from Dublin City Development Plan 2022-2028 illustrating our client's site (as indicated by blue outline) subject to the provisions of the Z2 zoning objective.

The development further states that *the general objective for such areas is to protect them from unsuitable new developments or works that would have a negative impact on the amenity or architectural quality of the area.*

It is considered, as presented above, that the Templeogue/ Rathfarnham to City Centre Core Bus Corridor Scheme will have a significant impact on the existing residential amenity of our client by virtue of restricted access, noise and air pollution and vibration effects. It is thus considered that the subject scheme neither protects nor improves the residential amenity of our client's property and, as such, is non-compliant with the provisions of the Z2 zoning objective.

5.7 Devaluation of Property

Our clients bought this particular property due to its safe access to the street. As noted previously, they looked to purchase No. 32, however, the presence of the bus stop discouraged them as they could foresee the issues associated with having such infrastructure located directly adjacent to their property.

Since purchasing the property, they invested substantial sums to renovate and extend the home for their young family. Indeed, our clients sought and received planning permission on two occasions, to first return what was operating as an optician's office to a period family home and second to extend that home. If the proposed bus corridor proceeds in its current form, then it can be assumed that the value of the property will reduce significantly, particularly because of the relocated bus stop and the various issues it will cause.

5.8 Spacing of Bus Stops

The H1 Bus Stop Review Methodology prepared by Bus Connects analysed ideal spacing between bus stops. It found that international research on the matter recommends 300 to 500 m between stops. For Bus Connects it is proposed that bus stops should be spaced approximately 400m apart on typical suburban sections of the route, dropping to approximately 250m in urban.

It is noted that the relocated bus stop would be located c. 340m from the next stop (Winton Ave.) along the road to the northeast. Currently, the distance between the existing stops is c. 360m. However, the Winton Ave. bus stop is also being proposed to move 50m north. Without moving the Brighton Road

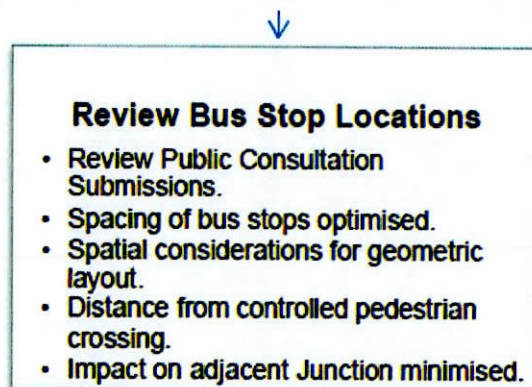
bus stop to the proposed No. 12 Terenure Road East location, the distance to the Winton Ave. bus stop (if moved) would be c. 420m.

As portrayed in the guide, the bus stop move to No. 12 Terenure Road East is seemingly connected with maintaining the approximate 400m apart spacing. However, an important point that the NTA proposal does not address is that the Heathfield Road bus stop (the prior stop to Brighton Road to the west) is currently c. 370m away. If the Brighton Road bus stop is moved 70m east as proposed, the distance to Heathfield Road jumps to c. 440 m as the Heathfield Road stop is remaining in its current location.

It needs to be noted that if the NTA did not move either the Winton Ave. or Brighton Road bus stop, all of the stops would satisfy the approximately 400m guidelines. Further, should the Brighton Road stop remain at its current location the c.420m to the Winton Avenue bus stop satisfies the H1 Bus Stop Review Methodology prepared by Bus Connects. Indeed, the notes for the Grosvenor Road bus stop state "This stop is located only 450m to the next stop and 450m from the previous stop which is considered appropriate." Retaining the current Brighton Road location leaves 420m to the next stop and 370m from the previous stop, which must then also be considered appropriate.

The guide also notes that locating bus stops close to junctions is optimum for pedestrian connectivity and safety, however, it can impact the capacity of a junction and may result in increased congestion. Further, the guide notes that bus stops should be "located close to main junctions without affecting road safety or junction operation". As discussed above, that is simply not the case at the junction of Terenure Road East and Rathgar Avenue/Orwell Road which is not typical of a standard road junction due to the historic and disorganised street layout which has resulted in awkwardly shaped junctions.

Finally, in Section 2.0 Methodology of Appendix H - Bus Stop Review submitted by the NTA the following is included within their flow chart as their process for determining bus stop locations:



There is no possibility the NTA followed their own methodology in reviewing public consultation submissions regarding the bus stop move to No. 12 Terenure Road East as the bus stop move to No. 12 Terenure Road East did not exist in any previous iteration or public form until plans were submitted to An Bord Pleanála. Consultation submissions would not be made for something no resident had any knowledge of.

We ask that the Board review the location of the bus stop having regard to the NTA's guidelines and the context of the junction and surrounding streets.

6.0 Conclusion

Having regard to the preceding sections of this report, we would ask that the Board consider the arguments presented in this submission. As noted, our clients purchased this particular property because it has a vehicular entrance and did not have a bus stop located to the front, unlike another property on the road in which they were interested. Furthermore, the proposed bus corridor and in particular the relocated bus stop will negatively impact traffic flows, noise pollution, air pollution and the general health and safety of residents along and using the route.

It is considered, for the above reasoning, that the relocation of the existing bus stop from No. 34 Terenure Road East to the front of Nos. 12 and 14 Terenure Road East will be detrimental to the residential amenity of our client's property and will unduly compromise the value of this property. In this regard, we would request that the bus stop is maintained at its current location as it offers no improvement to services by relocating it. It is worth noting that the bus stop was relocated to its current position several years ago due to issues with traffic congestion and obstruction closer to the village. The current proposal by the NTA seeks to repeat a mistake of the past. 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. We also ask that the Board fully assesses how the village functions daily, as the implications of the works will be far-reaching in terms of traffic safety, congestion and indeed the functionality of the 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.



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