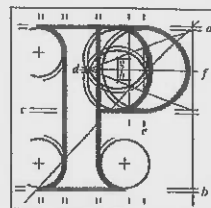


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Finola Connolly  
29 Villiers Rd  
Rathgar  
Dublin 6

**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](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

HA02A

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</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	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



An  
Bord  
Pleanála

## Observation on a Planning Appeal: Form.

LDG- 065578-23  
ABP- \_\_\_\_\_

08 AUG 2023

Fee: € 50 Type: UTP

Time: \_\_\_\_\_ By: post

### Your details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

Finola Connolly

(b) Address

29 Villiers Rd  
Rathgar  
Dublin 6

### Agent's details

#### 2. Agent's details

If you are an agent and are acting for someone else on this observation, please also write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's address

Click or tap here to enter text.

## Postal address for letters

3. During the appeal process we will post information and items to you or to your agent. For this observation, who should we write to? (Please tick ✓ one box only.)

You (the observer) at the address in Part 1

The agent at the address in Part 2

## Details about the proposed development

4. Please provide details about the appeal you wish to make an observation on. If you want, you can include a copy of the planning authority's decision as the observation details.

**(a) Planning authority**

(for example: Ballytown City Council)

Dublin City Council

**(b) An Bord Pleanála appeal case number (if available)**

(for example: ABP-300000-19)

Click or tap here to enter text.

**(c) Planning authority register reference number**

(for example: 18/0123)

Click or tap here to enter text.

**(d) Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

e Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme

## Observation details

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

Templeogue / Rathfamham to City Centre Core Bus Corridor Scheme proposes

- the closure of Rathgar Rd to outbound non public transport
  - introduction of a right hand turn at the intersection of Upp Rathmines Rd and Highfield Rd and
  - the introduction of new bus routes onto Highfield Rd
- 
- The proposed introduction of buses and the inevitable additional traffic flow arising from the closure of Rathgar Road to outbound non public transport will impact not only Highfield Road but Villiers Road, Neville Road and Templemore Avenue.
  - At present private and commercial traffic from the city and from Ranelagh has options to proceed either via Upper Rathmines Road or via Rathgar Road. As of now the choice of the Upper Rathmines route filters out traffic for Dartry, Milltown and Churchtown whereas Rathgar Road caters for Rathgar, Terenure, Templeogue, Rathfamham and onward traffic. The convergence of both streams on Upper Rathmines Road and the introduction of a right turn on to Highfield Road will result in long tail backs from the Dartry traffic lights. Traffic will be incentivised to access Highfield Road via Vernon Grove and Villiers Road rather than queuing to take the proposed right turn. This may also impact other side roads such as Neville Rd and Templemore Avenue.
  - This will bring an influx of through traffic and of commercial traffic including large vans and lorries onto narrow residential roads off Highfield Road and in particular onto Villiers Road which is totally unsuited to rake this additional traffic.
  - There is no reference in the proposal as to how the Orbital bus route and the additional traffic will be accommodated on the limited width of Highfield Road. It should be noted that there is already a very substantial volume of cyclists travelling either way on Highfield Road. The route serves schools in Rathgar

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

and Terenure in one direction and Dartry, Milltown, Ranelagh and Donnybrook in the other direction . It is also a direct route to UCD. A busy hospital still exists at St. Lukes.

#### Lack of proper consideration of impact on Highfield Rd

I do not believe that the NTA and Bus Connects have properly considered these volumes and have erred in their calculations. Unbelievably, in the Survey and reports, the following chart is included that implies that traffic on Highfield Road will fall in the AM peak (similarly effect on Upper Rathmines Road). There is reference to increased outbound traffic on Upp Rathmines Rd in the PM but none on Highfield Rd even though a right turn is being proposed from Upp Rathmines onto Highfield Rd.. In my opinion the traffic survey data has not been analysed corrected.

#### Impact on Indirect Study Area (AM Peak Hour)

Indirect Reductions in General Traffic: In addition to the general traffic flow reductions occurring along the direct study area, there are key reductions in general traffic noted along certain road links within the indirect study area during the AM Peak Hour. The key reductions in traffic flows along the indirect study area during the AM Peak Hour are outlined in Table 6.62.

Table 6.62: Road Links that Experience a Reduction of  $\geq 100$  Combined Flows during AM Peak Hour (Indirect Study Area)

Location	Map ID	Road Name	Do Minimum Flow (pcu)	Do Something Flow (pcu)	Flow Difference (pcu)
Eastern Side of Proposed Scheme	S.2	Firhouse Road	1,016	902	-114
		Old Bridge Road	1,356	1,008	-348
		Templeogue Road	1,128	498	-630
	S.3	Ballyboden Road	941	807	-134
		Butterfield Avenue	970	808	-163
		Nutgrove Avenue	1,148	871	-277
		Nutgrove Way	1,109	1,006	-103
	S.4	Braemor Road	597	497	-101
		Highfield Road	619	499	-119
		Orwell Road	1,148	1,013	-135
		Rathmines Road Upper	697	524	-172

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

#### **Modifications to Highfield Road / Rathmines Road Upper junction**

It is note worthy that in the extract from a note to Public Reps and Community Forum Members below dated 18.04.2023 that the modification to the junction of Upp Rathmines Rd and Highfield Rd was a later addition following consideration of submissions. However, it would appear that the implications of putting such a right turn in place have not been fully considered.

<https://busconnects.ie/wp-content/uploads/2023/04/Temploeogue-Rathfamham-ABP-Status-Update-Note-issued-to-Comm-Forum-Members-18.04.2023.pdf>

#### **Extract**

***“ABP Temploeogue/Rathfamham to City Centre Core Bus Corridor Scheme Status Update/Note to be issued to Public Reps & Community Forum Members 18.04.2023***

*Dear Public Representative/ Community Forum Member, We are emailing you to provide a status update in relation to the Core Bus Corridors. This week, the National Transport Authority (NTA) gave notice of its application under Section 51(2) of the Roads Act 1993 (as amended) to An Bord Pleanála for approval in relation to a proposed road development consisting of the construction of the Temploeogue/Rathfamham to City Centre Core Bus Corridor Scheme. For information, a small number of changes have been made to this scheme following consideration of the submissions received during the third round of public consultation (at the end of 2020) and these are summarised below.*

*• Provision of shuttle signal system Mount Pleasant Avenue;*

*• Modifications to Highfield Road / Rathmines Road Upper junction;”*

It is objectionable that the proposed plan gives no consideration to inevitable additional traffic accommodation on Highfield Road. It is an inescapable conclusion that the ultimate execution of this plan as proposed will require the widening of Highfield Road. The failure to address the critical role which Highfield Road will play in the implementation of this plan indicates a failure to fully work through the consequences of the diversion.

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

*I request that an Bord Pleanála request NTA to revisit the plan and do a full and comprehensive study to fully quantify how much extra traffic will happen if main roads are blocked off and in this case the closure of Rathgar Rd to outbound traffic.*

#### **Safety of the Right turn from Upp Rathmines Rd to Highfield Rd**

There used to be a right turn at this junction but it was stopped in 1972 according to an FOI that I submitted. They did not have any information going back to this time. Copy attached. There was no further record in relation to this junction with the Environment and Transport Division of Dublin City Council,. Does this suggest that the implications of reintroducing a right turn were not properly investigated?

I don't know the answer to this question and didn't have time to follow up further.

*I would request An Bord Pleanála to request the NTA to investigate this if it has not been satisfactorily done.. Safety is of paramount importance.*

#### **Lack of proper consultation**

On a statutory basis the NTA may have fulfilled its obligations. Since the first network proposal was published in 2018 the plans have undergone several revisions based on submissions from the public. They held a couple of rounds of public consultation, including public meetings and putting the plans on display. Unfortunately the last round of consultation - which has led to the iteration of the proposals before us now - took place online due to Covid restrictions and for that reason it has by-passed a lot of local communities like ourselves.

The changes re Highfield Rd and knock on consequences for Villiers Rd arise from the decision following earlier consultation to close off Rathgar Rd to outbound non public transport traffic. So people in this area have been totally kept in the dark.

Also I appreciate the NTA have to publish very detailed proposals and that they have done so. But they have failed on a basic communications and customer service basis to help



5. Please describe the grounds of your observation (planning reasons and arguments).  
You can type or write them in the space below or you can attach them separately.

people understand the proposal and the implications for their area. Councillors have told me they didn't even receive any presentation or basic Q&A sheet to help them inform people.

COVID may be to blame but people in this area were not kept informed. This is of particular concern given the changes that effect our area came into being around this time. No routes were on display, no NTA public information event or readable and understandable planning documents made available. The information documents online at present are incomprehensible to most ordinary people and we have had to try and contact Councillors and their advisers to make any sense of them.

I and many of my neighbours only became aware of the proposals as a result of Fine Gael Councillors organising an information meeting at the end of May. At that stage the closing date for observations was 20<sup>th</sup> June. That has since been extended for other reasons ( incorrect dates on the non-statutory Site Notices being posted) and thankfully it has given people time to make input. The level of interest was so great at the first meeting that the Councillors ~~organised that they~~ had to organise a virtual meeting as well.

As a result, they have failed to communicate the benefits and implications of the proposal and therefore they have failed to empower people to make an informed submission.

*I would ask An Bord Pleanala to require the NTA to hold a proper communication and consultation process with residents effected by changes that came around during COVID and which were not communicated in the normal way because of COVID.*

**Unfair decision to change original plan on Rathgar Road & Aarhus Convention.**

NTA and Bus Connects published plans for Rathgar Road that involved compulsory purchase orders ( CPOs) , removal of trees and installing car, bus and cycle routes and sought observations. Following receiving objections from the Rathgar residents the Plan was changed making it a one-way systems. I object to this decision for the following reasons:

- Not enough effort was made to seek input from residents on Upper Rathmines Road and Highfield Road , Villiers road, Templemore Road , Neville Road , Fairfield road and Fairfield park on the impact of the proposed use of

5. Please describe the grounds of your observation (planning reasons and arguments).  
You can type or write them in the space below or you can attach them separately.

Highfield road in the route 12 plan .

- Residents would have reviewed the original plans and might have had no objections, it is not reasonable to selectively address one part of the route without making sufficient efforts to seek input from those affected by changes

- The Aarhus Convention

<https://www.citizensinformation.ie/en/environment/environment-and-the-law/aarhus-convention/>) was ratified by Ireland covers major public projects is understood to require that ALL elements of the project must be considered as one and that one cannot selectively address individual parts of a scheme until the whole scheme is address as one.

*I request that an Bord Pleanala reject the plan and require the NTA to revisit the plan for a one-way system on Rathgar Road in the context of observations from Highfield Road and adjoining roads and take into account the balance of objections.*

## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.
- copy @ FOI email attached

## Fee

7. You must make sure that the correct [fee](#) is included with your observation. You can find out the correct fee to include in our [Fees and Charges Guide](#) on our website.

This document has been awarded a Plain English mark by NALA.

Last updated: April 2019.



[REDACTED]

---

**From:** foi@dublincity.ie  
**Sent:** Monday 17 July 2023 15:20  
**To:** [REDACTED]  
**Subject:** Re: Freedom of Information request

Good afternoon Finola,

I refer to your Freedom of Information request below, I have consulted with the Environment & Transport Department of Dublin City Council. The Stat associated with this statutory traffic measure indicates that it is in place since September 1972. Unfortunately we do not have records dating back that far so we do not have the historical background or reasoning for it. TAG are checking to see if they have more recent records, for example more recent requests related to it that might provide some insight, possibly some reference to the commencement of the right turn

If you have any further information that may assist our search and retrieval of records please let us know

Kind regards

Linda

Aonad um Shaoráil Faisnéise, An Roinn Dlí, Comhairle Cathrach Bhaile Átha Cliath, Bloc 3, Urlár 5, Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8, Éire.

Freedom of Information Unit, Law Department, Dublin City Council, Block 3, Floor 5, Civic Offices, Wood Quay, Dublin 8, Ireland.

T: 353 1 2223775

[www.dublincity.ie](http://www.dublincity.ie)

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**From:** [REDACTED]  
**Sent:** Friday 14 July 2023 14:17  
**To:** foi@dublincity.ie  
**Subject:** Freedom of Information request

Hi

This is a request under Freedom of Information Act 2014.

It is currently prohibited to make a right turn from Upp Rathmines Rd onto Highfield Rd. There used to be a right turn here but it was stopped btw 20-30 years ago. I am requesting documents in your possession relating to the cessation of this right turn. My focus is particularly on reasons why same would not be appropriate - this is to aid you on confining a search and reply to a limited number of documents.

Many thanks  
Kind Regards  
Finola Connolly  
29 Villiers Rd.,  
Rathmines  
D06x9c7

Good luck

with us

Hope it goes  
through this  
time!