

An  
Bord  
Pleanála

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

**Planning Authority Reference Number:**

**Your Reference:** Rathmines Parish

Virtus  
5th Floor, Glass House  
11 Coke Lane  
Smithfield  
Dublin 7  
D07 WNP2

**Date:** 14 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

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64 Sráid Maoilbhríde	64 Marlborough Street
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**AN BORD PLEANÁLA**  
 LDG- 065474-23  
 ABP- \_\_\_\_\_  
 01 AUG 2023  
 Fee: € 50 Type: c/c  
 Time: 13:06 By: Hand



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

1st August 2023

Dear Sir/Madam,

**BUSCONNECTS TEMPLEOGUE/RATHFARNHAM TO CITY CENTRE CORE BUS CORRIDOR (ABP REF: HA29N.316272) – SUBMISSION ON BEHALF OF RATHMINES PARISH**

Virtus are instructed by Rathmines Parish to submit this observation in relation to the above application for the Templeogue/Rathfarnham to City Centre Bus Connects Corridor Scheme (ABP Ref: HA29N.316272).

The deadline for submissions is 15<sup>th</sup> August 2023. Payment of €50 is made alongside this submission.

In particular, our submission relates to The Church of Mary Immaculate Refuge of Sinners, Rathmines Road, Dublin 6. The Church provides a range of services to parishioners such as baptisms, marriage ceremonies, first holy communions, confession, confirmations, funerals and daily and Sunday masses. In addition to the Church building, there are two associated parking areas: one to the front (west) of the Church onto Rathmines Road and a second larger car park accessed off Richmond Hill.

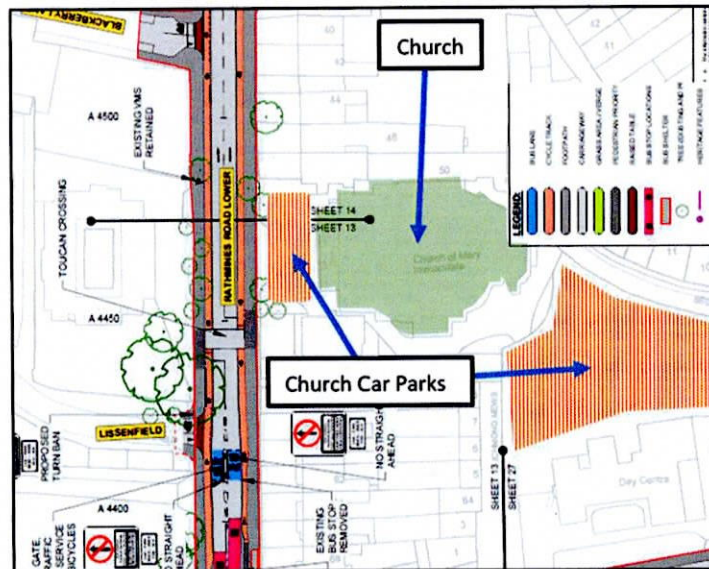


Figure 1: Location of Church and Car Parks

Office +353 1 8665662  
[www.virtuspm.ie](http://www.virtuspm.ie)

Directors: Jason Cronin MRICS, MSCS | Neilus Hunt | Robert Keran |  
Registered Number: 505191 | VAT Registration No: 9808275W

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**Policy*****National Planning Framework 2040***

The National Planning Framework 2040 (the NPF) sets out the national planning policy for the country. The NPF sets a strong framework for compact growth and consolidation of our existing towns and cities. Specific reference is also given to support for a range of public transport projects. National Strategic Outcome 4 is Sustainable Mobility, and Strategic Investment Priority 4 is for Environmentally Sustainable Public Transport. The overarching support for projects such as BusConnects is noted.

The NPF also provides for communities. National Policy Objective 30 relates to meeting the requirements of an aging population. It states:

*“Local planning, housing, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans”.*

This demonstrates a need for proposals such as BusConnects to acknowledge and address the requirements of an aging population.

***Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly***

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA) 2019-2031 transposes the national policy to a regional level. The objectives of compact growth and sustainable mobility are carried over to this document.

RPO (Regional Policy Objective) 9.1 sets out that Local Authorities shall ensure the integration of age friendly and family friendly strategies in development plans and other relevant local policy and decision making, including provision of buildings and public spaces are designed so that everyone can move around with ease, avoiding separation or segregation. RPO 9.12 states that in planning policy formulation and implementation, local authorities and other stakeholders shall be informed by the need to cater for all levels of disability, through the appropriate mitigation of the built environment and in particular for the needs of an aging population.

***Dublin City Development Plan 2022-2028***

The Church is located within the administrative area of Dublin City Council. The Development Plan comprises the Dublin City Development Plan 2022-2028.

Policy QHSN14 states that it is the policy of Dublin City Council *“to support the entitlement of all members of the community to enjoy a high quality living environment and to support local*

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communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design / planning needs". QHSN17 is "to promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle...". QHSN18 reiterates the same point.

With regard to places of worship, the Development Plan states:

*"The Council recognise the need for a range of religious facilities as an important component of community infrastructure. Places of worship often provide a community resource through which the residents of a neighbourhood can gain information, education, medical or welfare assistance and social contact".*

Policy SMT22 states that it is policy of Dublin City Council to support the expeditious delivery of key sustainable transport projects including, *inter alia*, BusConnects Core Bus Corridor Projects.

The Church is located on lands zoned Z15. The objective for such lands is: "To protect and provide for community uses and social infrastructure". The Development Plan states: "It is the policy of the Council to promote the retention, protection and enhancement of the city's Z15 lands as they contribute to the creation of vibrant neighbourhoods, healthy placemaking and a sustainable well connected city".

**Proposals Adjacent to the Site**

The proposals adjacent to the site comprise:

- The introduction of BusConnects works to Rathmines Road.
- The introduction of a "Bus Gate" to the south of the Church on Rathmines Road to operate between 6am and 8pm, 7 days a week. This Bus Gate would stop private cars from passing through this point between these hours.
- Reorganization of surrounding roads.

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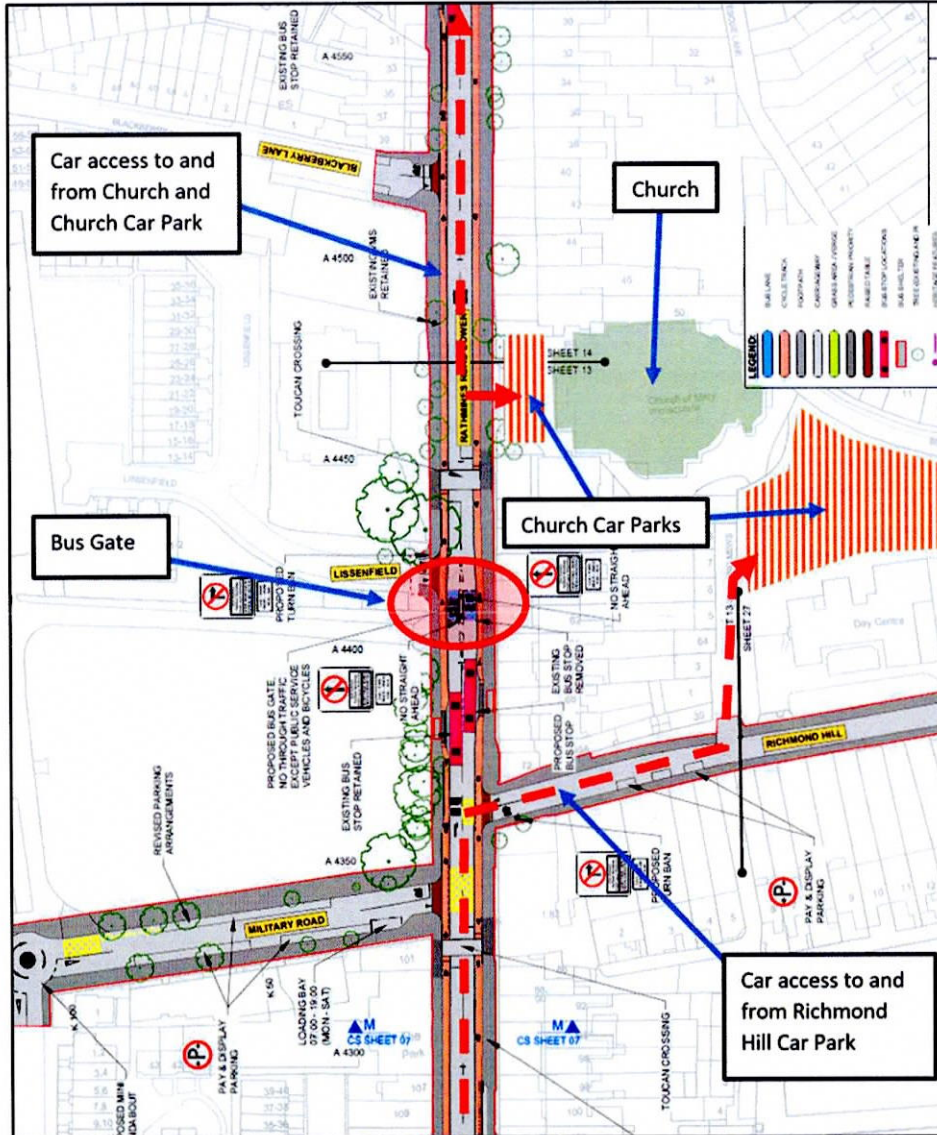


Figure 2: Church, Car Parks and Proposed Works

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**Submission**

Virtus and Rathmines Parish have reviewed the proposed development. The proposals are broadly welcomed subject to some minor observations.

The Church of Mary Immaculate Refuge of Sinners provides an important service to their parishioners, and it is very important that any works do not impede access to the Church. The Parish's main interests are as follows:

- To ensure that parishioners can still access the church easily by foot, bicycle and public transport.
- To ensure that vehicular access is maintained to the Church from Rathmines Road to provide access for funerals, weddings and other church events.
- To ensure access to the car park, accessed from Rathmines Road, is retained for parishioners at all times.
- To ensure access to our car park, accessed from Richmond Hill, is retained for parishioners at all times.

The works proposed in the vicinity of the Church comprise improvements to bus and cycle facilities and the provision of a "Bus Gate" on Rathmines Road, just to the south of the Church.

A Bus Gate is a measure by which only certain traffic will be allowed to pass through a certain point in the road. In this case, the proposed Bus Gate on Rathmines Road will allow only busses, public service vehicles and bicycles to pass this point between 6am and 8pm, 7 days a week. Private cars will not be allowed to pass through this Bus Gate during these hours.

All traffic traveling north (towards the city) on Rathmines Road will have to turn left onto Military Road or will have to turn right onto Richmond Hill and will be directed back out from the city. All traffic traveling south (away from the city) will be similarly restricted.

The works to improve the public transport provision along Rathmines Road will have benefits for residents of the wider city who pass by the Church every day. These benefits are acknowledged but the Church must ensure that works do not harm their ability to serve the Parish.

The Parish is reassured that access to the Church car park on Richmond Hill will be maintained but this access will only be from the south. Access to the car park on the front of the Church will also be maintained but will only be possible from the north (canal side). The Parish welcomes that access to both car parks is protected in this proposal and it is imperative that this is maintained throughout the proposal.

The Bus Gate on Rathmines Road, just to the south of the Church, will restrict parishioners and church vehicles from accessing the Church while it is operational from the south.

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We acknowledge the purpose of Bus Gate in order for this section of the proposal to operate successfully.

**We request that the hours of operation of this bus gate are reduced to better acknowledge the busiest hours for traffic in the area and to not be in operation when the Church is in its most intensive use. We request that the hours of operation of this Bus Gate are amended to the following times:**

- 6am to 9am
- 4pm to 8pm

**This amendment would mean that the Bus Gate is operational for the busiest times of the day but would not be operational at quieter times of the day when mass and other services would take place.**

It is considered that this change would address the concerns of the Church while also allowing the Core Bus Connects Corridor Scheme to achieve its aims of improving bus times to the south of the city.

**Conclusion**

The benefits of the BusConnects programme are recognised and improved public transport through the area will have benefits for our parishioners and encourage more sustainable modes of transport are used generally.

We have given careful consideration to the proposals and feel that our request to alter the hours of operation of the Bus Gate to better facilitate the Church is a reasonable request.

We respectfully request that our concerns are addressed in the approved scheme should An Bord Pleanála be minded to grant permission.

Yours faithfully,

A handwritten signature in black ink that reads 'Brian Coughlan'.

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**Brian Coughlan**  
BA, MSc, MIPI, MRTPI  
**Virtus**

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