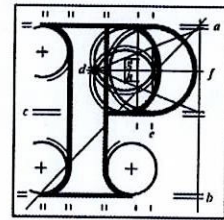


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Rita Delahunty  
25 Villiers Road  
Rathgar  
Dublin 6

**Date:** 18 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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D01 V902	D01 V902

I, Rita Delahunty of 25 Villiers Road, Rathgar, Dublin 6 make the following submission and objections in relation to the Rathfarnham / Templeogue to City Centre Core Bus Quality Scheme.

The Castlewood Avenue Junction with Upper Rathmines Road;

It is not a sustainable or proper planning proposal to squeeze the volume of non public transport vehicles which must, of necessity, access the city and its environs into a pinch point at the above junction. This is an already congested narrow route leading from Castlewood Avenue to the Ranelagh Triangle. A lane of constant vehicular traffic each way with cyclists taking their chances means this thoroughfare is at its capacity in rush morning and evening at present. It is absurd to propose that the private and commercial traffic which is currently shared with Lower Rathmines Road will now squeeze onto Castlewood Avenue and Ranelagh without creating tail backs ultimately causing delays backing up onto Rathgar Road and Upper Rathmines Road. It is suggested that allowing a lane of non public vehicles with priority bus lights on Lower Rathmines Road would achieve a better outcome.

Upper Rathmines / Highfield Diversion;

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. They will become through cuts from Upper Rathmines Road to avoid queuing at the proposed traffic lights at the Dartry end of Highfield Road. The consequence of this proposal is that residents of these narrow residential roads will bear the burden of the closure of Rathgar Road to outbound traffic and the introduction of the proposed Bus Gate on Lower Rathmines Road.

At present, private and commercial traffic from the city and from Ranelagh have options to proceed either via Upper Rathmines Road or via Rathgar Road. As of now selecting the Upper Rathmines option filters out traffic for Dartry, Milltown and Churchtown whereas Rathgar Road caters for Rathgar, Terenure, Templeogue, Rathfarnham and onward going 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 principally with some diffusing onto the adjoining Neville and

Templemore Roads rather than queuing to take the proposed right turn. This will bring an influx of private traffic and in particular commercial traffic including large vans and lorries onto narrow residential roads off Highfield Road and in particular onto Villiers Road. Villiers Road has capacity for one lane of traffic thereby requiring motorists to yield at either end of the road. As there is little off street parking there is on street parking on either side of the road. The proposed development for Upper Rathmines Road and Highfield Road is contrary to good planning and sustainable development for Villiers Road and the surrounding small residential roads.

Highfield Road. Right turn at Dartry Junction.

Though it is not referred to as such in the proposal this plan envisages creating a major traffic artery through Highfield Road. This is the inevitable rationale for the proposed right turns at either end of Highfield Road. Despite a prolonged pattern of suppressing right turns in the Dublin City Council area to alleviate this inevitable source of traffic delays it is illogical to now reinstate one which will interfere with the flow of traffic inward from Dartry in order to create a major access artery on Highfield Road. This is not a well thought out development as it reverses a decision which was made to ease the flow of traffic through Dartry junction when traffic volumes were much lighter and when the current traffic arrangements on Rathgar Road already existed. It is illogical that the necessity for this right turn arises from a diversion consequent on the suppression of the current well functioning direct outward route from the city is illogical. No plan is disclosed for how the right turn onto Highfield Road will be configured and no information on the delay which will be caused to all traffic but particularly City bound traffic is provided. If the objective is to reduce travel times the impact of any obstruction such as a new right turn on this already complicated junction should be evaluated and decided upon in terms of time lost, cost and disruption to traffic at the existing well functioning junction. This element of the plan cannot be evaluated as suitable or sustainable in accordance with proper planning objectives.

Highfield Road/ Rathgar Road Junction proposed Right Turn.

A proposed right turn at the above junction is mooted for the purpose of completing the diversion caused by closing Rathgar Road outward to non public traffic. This will cause a back up of traffic on Highfield Road as traffic including large lorries and delivery trucks back up waiting through a light sequence. This right turn was eliminated many years ago

for the same reason as mentioned in the last paragraph. Right turns cause delay especially where the road width and configuration are limited as it is at this junction. There is a provision for deliveries to a local small supermarket by way of a narrow designated channel. It is now proposed to remove this to facilitate the achievement of additional width. This will not actually achieve any improvement to the situation as the trucks will still have to park on the road to deliver. The objection to the right turn is also based on its impact on oncoming city bound traffic from Orwell Road and Terenure Road East.

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 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 with consequent traffic arising especially ambulances and taxis. The progress of traffic is governed by the width of the road, parking and the presence of commercial delivery vehicles at the Rathgar end.

Rathgar Road by contrast is a broad thoroughfare with wide footpaths. It is twice the length and considerably wider than Highfield Road with all its pavements being half as wide again as those on Highfield Road. It is inconceivable that it cannot be configured to accommodate a lane of outgoing private cars. At the very least a reduction in the widths of the generous pavements should be considered to make more road space rather than creating a traffic problem on a neighbouring road. There is a precedent for this on Villiers Road where the road was widened by decreasing the footpaths in the recent past. A previous proposal envisaged a CPO process for Rathgar Road but it is understood that there is now an agreement that it will not be proceeded with. Failure to adhere to the "nothing is agreed until everything is agreed" maxim has in this instance adversely impacted Upper Rathmines Road, Highfield Road and Villiers Road which appear to have been designated to bear the burden of failure to get acceptance for the original proposal. It is submitted that the proposal will create an unnecessary and unsustainable traffic burden on Highfield Road with a volume of traffic for which the road is not designed and has not the capacity to carry.

It is illogical to suggest that the traffic volumes which will be diverted on to Highfield Road will be accommodated as the road is now structured. 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. It is premature to seek planning permission for the plan until the implications for Highfield Road have been fully fleshed out. The proposal for Highfield Road to the extent that it can be extrapolated from the proposal would be an unacceptable solution contrary to proper planning and sustainable development and would be detrimental to the both the ecological, environmental and built heritage of the area.

It is submitted to the Board that;

1. An up to date assessment of traffic volumes now using Highfield Road, Upper Rathmines Road and the Rathmines/ Castlewood Avenue junction has not been submitted with this Application which is a prerequisite to proceeding with this or any proposal.
2. This application is not ready for consideration by the Board and should be rejected as being unsuitable.
3. That the overall time saving of approximately 6 minutes expected to be achieved by the proposed plan on the route is insignificant in relation to the disruption, inconvenience and permanent damage to the ecological and built environment and to the amenity and quality of local community life in the area generally and to the Highfield Road, Upper Rathmines Road/Villiers Road community in particular.

For the foregoing reasons I submit that this application should be rejected.

Rita Delahunty