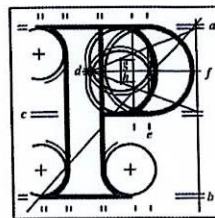


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Terenure College Rugby Football Club  
Paul Candon - Chairman  
'Lakelands'  
Greenlea Grove  
Terenure  
Dublin 6  
D6W C660

**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

Tell	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<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



## **Terenure College Rugby Football Club**

**An Bórd Pleanála  
64 Marlborough Street  
Rotunda  
Dublin 1**

**August 14<sup>th</sup> 2023**

### **Re Templeogue Rathfarnham Core Bus Corridor HA29N.316272**

Dear Sir / Madam,

The following is an observation on behalf of **Terenure College Rugby Football Club**.

Founded in 1940, Terenure College RFC is one of Ireland's largest community-based rugby clubs with a strong competitive tradition. Terenure College Rugby Football Club aims to be the most inspiring and inclusive community rugby club promoting rugby excellence, enjoyment, and friendship. The club runs a vibrant Mini and Youth rugby programme for over 500 boys and girls. With over 1200 members we have a strong community and family ethos with strong relationships with local businesses and schools.

We field 7 adult teams, and our First IV compete in Division 1A of the men's All Ireland League of which we are current holders in addition to the Bateman Cup, the Leinster Senior Cup, and the Leinster Senior League.

The Terenure Tigers special needs team are in their eighth season and cater for players, both boys and girls ages 6 – 16 years old. We also have an expanding women's and girls' section with girls' mini rugby and women's touch rugby.

We are located in Lakelands off Greenlea Road. Access to the grounds is through Greenlea Grove from Greenlea Road. Full details of each road are set out at the end of the letter, together with some detail about each road, relevant to this application. We particularly draw your attention to the rugby club and schools in the area and the threat to children's safety posed by the scheme.

We have training sessions every evening during the season and on Sunday over 500 young children with their parent(s), attend training and matches throughout the day. Our Terenure Tigers train on Sunday and they, along with their parents need vehicular access to the club.

We are the current champions of Division 1A of the men's All Ireland League and as a result we expect increased support for many of our home games this season – up to 2,000 people. We have a broad range of supporters with many older members travelling by car. We implement traffic control measures for major events.

Our opposing teams, coaches and supporters require access to the club grounds on match days with large coaches and cars arriving from early morning to late evening.

We are a community-based club with a busy calendar throughout the year. Our facilities are being used for a wide variety of purposes in addition to rugby. We host Fundraisers, Charity Events, Dance Classes, Pilates, Lego Camps, Post-natal Boot Camps, Summer, Easter and Halloween Camps, Community Meeting Spaces, Social Gatherings, GAA training, BBQ's, Tag rugby. We have a coffee shop and pizza hut onsite which serves the wider community.

We welcome those provisions of Bus Connects, which will provide better bus services for our area and/or which will significantly decrease the time taken by a bus to get to its destination. The local features to which we refer achieve nothing in these respects, but create enormous inconvenience for residents in Terenure, impact attendance and easy access to our club, endanger schoolchildren by vastly increasing traffic on roads with schools and are environmentally damaging.

We entirely agree that the use of cars needs to be significantly reduced. Our statistics related to our area show quite high bus and bike usage. We also encourage people to attend club events on foot and we have installed 20 bike rails for cyclists. However, there are practical reasons why some people attending the club need to use their cars ranging from lack of mobility, children needing to be in several different places at much the same time, carrying gear bags and equipment which cannot really be conveniently carried out by bus, bike or on foot. The Terenure Tigers (special needs) Team cannot travel by bus. There is also the practical consideration that there is an ongoing migration to electric vehicles, which should eliminate the pollution risk arising from their operation. We are currently awaiting the installation of EV Charging points in the club car park.

We find it surprising that on the one hand NTA is proposing to reduce the level of bus service on Templeogue Road in the morning peak from 23 to 10 and yet considers it necessary to impose measures which greatly inconvenience residents, businesses, and club. Further by their own admission In Traffic and Transport, the maximum time saving on average will be 1.6 minutes in each direction, the second lowest across all corridors.

The club is accessed from both sides of Greenlea road and on foot through Lakelands Park and Terenure College school from Templeogue Road. There is no direct bus service to the rugby club but all roads linked to Greenlea Road and Templeogue Road are impacted by Bus Connects.

Many of our observations are based on the wide ranging number of visitors, supporters, members, players, staff and suppliers who need regular access to the clubhouse and its environs. People travel from all over Ireland and all parts of Dublin for matches, training and events not to mention the great community centre the club has become over the years. We are a club dependent on our members, sponsors and supporters and we need to provide easy access and egress. We have 100 parking spaces available to visitors which is filled to capacity each evening and weekend.

### **Templeogue Road**

One outstanding issue with the scheme is the proposed closure of Templeogue Road by a bus gate from 6am to 8pm seven days a week, which we believe has significant negative implication for our environment. There is already an existing bus priority light on this road, which will prioritise the bus and achieves the same speed for it, without the very negative consequences.

Arising from the unnecessary bus gate and its unreasonable hours of operation, we have been “foisted” with two bans on turns into our local roads from Fortfield Road. This is a clear acknowledgement by NTA that significant traffic will divert in our direction, and this is an attempt to provide a measure to address this. We believe that the principal effect of these bans will be to make access for residents, school children and club members on those roads very difficult. We note that these bans are to apply 24 hours and do not match the bus gate hours, even though they seem to be clearly related.

Terenure Road West is already seriously congested, and we are very concerned at measures which either direct extra traffic to the road or which impede the clearance of traffic at the Terenure village end of the road.

### **Fortfield Road**

As this is one of the main access points to Greenlea Road and Terenure College Rugby Football Club we believe it is relevant to point out the net effect will be a large proportion of this traffic will use College Drive and Wainsfort Grove to avoid the proposed no right turn at Greenlea Road.

We note that in Chapter 408 Traffic Signs and Road Markings, there are few signs proposed to divert traffic before it gets to Fortfield Road. A sign at the Spawell does indicate a right turn to Terenure but has straight ahead for St Luke's in Rathgar. There is a sign at Templeogue Bridge indicating Terenure, City Centre and Rathfarnham turn right. The only material sign which indicates City Centre, St Lukes, Rathfarnham and Terenure all to the right (but with no dedicated right turning lane) and an indication that straight ahead is local access. This sign is not mandatory. The last such sign indicated “local access” only straight ahead and the inference is that Fortfield Road is general access. There are no directional signs whatever indicated on the Rathfarnham Road maps. There are also no signs whatever directing

traffic towards Rathgar and Rathmines, which we believe is a primary reason for traffic on Templeogue Road. We think the signage arrangement is grossly deficient to stop traffic coming as far as Fortfield Road and only then realising they are heading to a dead-end.

It is a matter of conjecture as to where the traffic originating from the M50 ex Tallaght goes. All clubs outside of Dublin use the M50 to get to the clubhouse. It is clear from all the maps indicating traffic flows post Bus Connects, that there is some reduction in the enormous volume of traffic on the section of the Tallaght Road to the Spawell. However, even if one accepts that as credible, clearly there would be a much wider blue line on the section of Templeogue Road between Fortfield Road and Terenure village, given the dead end from that point. Everything about those maps points to Fortfield Road receiving all the residual traffic left on Templeogue Road, which is we believe far more than it can reasonably cope with.

We are also dismayed that the limited traffic modelling conducted by Bus Connects focuses only on two hours in the morning and evening peak. We believe that they must produce modelling for every hour that they propose their bus gates will operate. We are already used to extra traffic between 7.30am and 8.30am and 5pm to 6pm. However, a bus gate operating 12 noon to 1pm will likely give us increased traffic at that hour. We ask that you direct NTA to provide this information in their response document, as at least this will give some opportunity to understand what we are facing and to comment on it.

Generally, it is our view that a lot of traffic will continue to come down Templeogue Road and continue into Fortfield Road given the combination of poor signage and the lack of a right turn lane at Templeville Road/Springfield. This will have implications for the volume of traffic on Fortfield Road and for roads off it, particularly Greenlea Road.

Fortfield Road is a residential road not designed for massive volumes of traffic. It has two schools on it and St Pius National Schools are situated nearby on Fortfield Park. The extra traffic is a particular safety hazard for children, who are encouraged to walk or use bicycles.

We vehemently oppose in application 317660 to put a bus gate on Kimmage Road. There is likely to be considerable stalling of traffic on the road back from KCR. The extra traffic is likely to include commercial vehicles and motorcycles with the obvious hazards they create. There will be a marked increase in traffic volumes at Kimmage Cross Roads and Kimmage Road West – Kimmage Road West is a relatively narrow road with no cycle lanes and currently carries a considerable volume of traffic.

The ban on a right turn into Rathdown Avenue is likely to lead to massively increased parking in Fortfield Road for Bushy Park related traffic, particularly sports activities in the evening. There is a fear of obstructed driveways and poor sight lines when emerging onto a busy road. There are already significant parking issues on Fortfield Road associated with Bushy Park.

The problems with directing traffic to Fortfield Road are so numerous as to suggest that for that reason alone the bus gate on Templeogue Road simply should not be permitted. As Fortfield Road is proposed to be the last left turn into the city, many vehicles, including HGV's will divert to this route causing increased traffic flow not just for the Rugby Club but for Our Lady's School, St Pius X Primary School and Terenure College, with resultant fears for child safety.

### **Turn bans ex Fortfield Road**

This section is all irrelevant if the bus gate at Templeogue Road is not allowed.

Turn bans from Fortfield road will severely impact traffic and access to Terenure College Rugby Football Club

At the outset we should say that there are different views among residents about turn bans. No doubt some (but likely only a very few) might favour a ban under current conditions. If contrary to our clear request, a bus gate is imposed, some residents will feel that there has to be a mirroring turn ban but others will place greater value on access. There is a cogent view, as outlined below, that a ban will be ineffective to stop the road being inundated, because of a mixture of law breaking and of traffic approaching Greenlea from the left.

We believe that turn bans at these locations will primarily inconvenience people who live on Greenlea/Parkmore and Lavarna respectively. It is also the case that residents of Terenure Road West use the turns to access their road because of the ban on turning left into their road at Terenure Place and the difficulty of making a right turn at Kimmage Cross Roads. Common local facilities accessed using these turns are: The Rugby Club, the parish church on College Drive, schools at Terenure College and Our Lady's, Rathfarnham Shopping Centre and the M50.

Terenure College Rugby Club and residents of Greenlea and to a lesser extent Parkmore Drive are very concerned that if the bus gate on Templeogue is to proceed, a large portion of the traffic noted above including commercial vehicles and motorcycles will access Terenure, Rathgar and Rathmines via their roads, as it is clearly the shortest route to those places.

It is quite easy legally to evade the right turn ban by using College Drive, Wainsfort Grove and Wainsfort Park. This would be a great annoyance to residents there and would also increase traffic at the park on the corner of College Drive and Wainsfort Grove, (where a children's playground is proposed). This detour would also add approximately 500 metres to a journey.

Further, many motorists may disobey the ban and there is substantial evidence of local bans being flouted (for example at Lower Kimmage Road/Aideen Avenue). Even the quite dangerous banned turn from Templeogue Road into Terenure Road West and vice versa was not observed on 26 November 2019 by 58 vehicles. If NTA are seriously proposing this, you should request an analysis from them of the many junctions they have surveyed where a ban is in place, showing the level of observance. We have a concern that traffic seeking to circumvent right turn bans will do u turns on Fortfield Road, so that they can approach the banned turns from the left. This is clearly undesirable and a safety hazard. An Garda Siochana will not be in a position to enforce all of these and as a result, they may be ineffective in terms of managing traffic flows and congestion in Terenure, Rathgar and Rathmines.

There are businesses at the Fortfield end of Greenlea which attract a lot of traffic. We are concerned that this traffic will park on Fortfield Road and College Drive to avoid having to make an illegal right turn. Parking on Fortfield Road at this location is already a safety hazard.

If the bus gate is implemented, we are convinced that there will be a lot of extra traffic in Greenlea Road, Ave, Drive, Park and Parkmore Drive. We believe that motorists will ignore the ban or will circumvent it by taking a short detour or a U turn. Further, the turn ban will lead to unsafe parking on Fortfield Road itself. This will cause obstructions and delays for anyone trying to access the Rugby club even outside of peak hours.

#### **Lavarna Grove**

We are surprised that the Templeogue Rathfarnham corridor would lead to a suggestion of a right turn ban into Lavarna Grove. We believe the only impact of this will be to inconvenience residents. There is little merit in detouring as far as Lavarna to circumvent the bus gate, as it joins Terenure Road West at a point where tailbacks could be enormous at busy times and where Greenlea is clearly the more convenient option at less busy times. There is no justification for such a ban as part of this application. It is possible that issues caused by the Kimmage corridor bus gate close to KCR will make Lavarna attractive as an alternative route; however again we believe this bus gate should not be permitted to avoid problems.

If the ban is imposed, cars approaching Lavarna from the south will have to use Wainsfort Road and take a difficult right turn at the junction of Wainsfort and Lavarna.

#### **Terenure Road West**

Terenure Road West is frequently congested and is arguably one of the slowest junctions in the city at its Terenure village end. Most of the nonlocal traffic comes from Kimmage Road West. However, this is also used to access the Rugby Club.

Under Bus Connects, Terenure Road West will have three buses, the S4, 74 and 81, more than it currently has. It is important for residents and NTA that buses will be able to navigate the road. We fear that the Templeogue Road bus gate will put extra traffic onto this road and find the suggestion of a reduction not credible. Further if a Lower Kimmage Road bus gate is implemented, it seems inevitable that more traffic will come from KCR.

We believe that three measures proposed at Terenure Cross area will make the problem worse (and should not happen) being:

1. a proposal for a dedicated pedestrian phase to cross both Terenure Road West and Templeogue Road at their intersection, when there are already effective pedestrian crossings of both roads.
2. a proposal to allow a right turn ex Rathfarnham Road to Terenure Road East for buses, taxis and cyclists. We believe this turn should be for A2 and A4 buses only and certainly not for taxis and bicycles

3. a proposal to eliminate a very acute left turn slip from Rathfarnham Road to Terenure Place. It is our opinion this will make the manoeuvre very difficult and will add to congestion here. While many left turn slips are to be eliminated under the bus corridor plans, all of them seem to be right angle turns.

#### **Other local issues**

- We support our neighbours in Terenure Road East in their objections to road widening at this point, which will remove a significant number of trees. This will very negatively alter the visual aspect of Terenure Village from Terenure Place. Some very old trees will be removed. Again an “undeclared” bus priority light which already exists would obviate the need for this.
- We are being offered the prospect of a ten-minute neighbourhood where everything we need is within that range. Terenure village with its range of shops (including Aldi, Lidl and Tesco supermarkets) sports clubs, schools, library and other facilities offers this. However, traders fear that the lack of access due to the bus gate and a congested Rathfarnham Road and Terenure Road West will make their businesses unviable. We think this fear is justified and that we will lose our 10-minute neighbourhood for a bus corridor offering a minute off a journey.
- Many of our older residents and parents with young children use our local park Bushy Park and also Lakelands Park with access through Terenure College Rugby Football Club and Terenure College School. Bushy Park may be too far to walk for some and Lakelands is a preferred alternative. The ban on a right turn into Rathdown Avenue (obviously bus gate connected) means a very long drive (with corresponding extra car pollution) to get access to that side of Bushy Park. While the park is accessible from the Rathfarnham side, there is limited parking and there are very steep hills up to the parkland level, which are quite challenging.
- We are unhappy that bus stop 1159 at Terenure College on the Templeogue Road is to be moved to a place which frequently floods when it rains. There is no flooding issue at its current location. No bus shelter is proposed at the new location, whereas the trees offer some protection at the current stop. We note also that a bus stop used by our residents and close to Lakelands Park is to be moved. We cannot understand why bus stop moves has not been clearly flagged by a notice at the bus stop. These bus stops are closest to the clubhouse for staff, members and supporters to access on foot.
- A left turn slip road is to be removed turning from Templeogue Road into Springfield Avenue, with no reason given. This is heavily used and DMURS would imply that you need to leave it there or have NTA put in a dedicated slip.
- We are concerned at the proposal to CPO all the parkland fronting Bushy Park and Rathdown Avenue along the Templeogue Road. The existing surfaced paths and tracks are carefully threaded between the trees. We believe that there is no local call for any upgrade of any track there and that the likely result of any works there will destroy the trees. We do not believe this CPO should be permitted.

#### **Other issues**

- We cannot understand why, if Lower Rathmines Road is to be closed by bus gates, it is also necessary to eliminate all of the “straight through” routes crossing Ranelagh Road and Sandford Road. We refer to routes via the Ranelagh Triangle from Charleston Road to Chelmsford Road and a route from Merton Drive to Marlborough Road. Further, we understand there are active proposals to make Beaver Row in Donnybrook one way, which may add to the routes barred.
- Many of our members travel by bus through (and to) Rathmines and further afield. We cannot see any need for bus gates in Rathmines to operate on Saturday or Sunday, as there are no delays. These are the days we have training and matches.
- We are aware that residents in Upper Rathmines Road and Highfield Road have an issue with the closure of Rathgar Road outbound. This also affects access to our area. We do not think adequate thought has been given to the relative merits of the original scheme for Rathgar Road remaining two way and what is now proposed. Further there is a question as to whether peak hour bus gates outbound Monday to Friday on Rathgar Road would achieve the necessary bus priority.
- We note that alternate sections of the route from Fortfield Road as far as Kevin Street will be either one way inbound or outbound. We cannot see why a consistent direction of flow cannot be maintained on the entire corridor.

### **Fortfield Road**

This is over 1km long and runs between Templeogue Road on the Templeogue Rathfarnham corridor and KCR, the start of the Kimmage corridor. It is primarily residential.

The right turn junction at Greenlea Road is the most direct route to the Rugby Club from the M50, Templeogue, Rathfarnham areas.

However, there are two schools on it, Terenure College and Our Lady's School. Further, St. Pius National Schools are about 250 metres from the road. Across the three schools there are over 2,500 pupils. There is accordingly a very significant volume of school related traffic on the road and a number of "lollipop" crossings at school times. The local parish church is about 100 m from the road. It is our opinion that the proposals are a grave danger to school children.

The 54A bus route traverses most of the road. While this is currently a two buses an hour service, this is to be upgraded to six an hour under Bus Connects.

There is relatively little parking on the road, except for some spill over parking at the Templeogue Road end associated with Bushy Park and at the junction with Greenlea Road associated with shops and businesses and with busy funerals in St. Pius' Church.

### **Glenavy Park**

This is an exclusively residential cul de sac of about 20 houses leading onto Terenure Road West and therefore affected by its issues.

### **Greenlea Avenue**

This is a short exclusively residential road connecting Greenlea Road and Parkmore Drive largely used for local access.

### **Greenlea Drive**

This is a short exclusively residential road connecting Greenlea Road and Parkmore Drive largely used for local access.

### **Greenlea Grove**

This is a short exclusively residential road off Greenlea Road. It is however, the only vehicular access to Terenure College Rugby Football Club.

### **Greenlea Park**

This is a short exclusively residential road connecting Greenlea Road and Parkmore Drive largely used for local access. It has some overspill parking and is very narrow.

### **Greenlea Road**

This is a long largely residential road connecting Fortfield Road and Terenure Road West. There are over 100 houses. It is quite busy in the morning and evening peaks with some through traffic avoiding local main roads.

There are a number of local shops and businesses at the Fortfield Road end. These include a post office, a pharmacy, a doctor and a music school, all significant traffic attractors.

It has quite a lot of on street parking at both ends. At the Fortfield end this is related to local shops and businesses. At the Terenure Road West end, parking is related to it being the nearest free parking to Terenure village and a drop off point for the Presentation Primary and Secondary schools.

A little over halfway down is Greenlea Grove with the only vehicular access to the Rugby Club.

There can be some parking on Greenlea Road close to Greenlea Grove for Terenure College Rugby Club particularly for matches.

### **Lavarna Grove**

This is a residential road of around 60 houses which runs between Fortfield Road and Terenure Road West. It has a large green area in the middle used by children to play and therefore constitutes a greater risk of accidents involving children. It is however currently very quiet bar some rush hour through traffic.

**Lavarna Road**

This is a residential road of around 40 houses off Lavarna Grove but joining it at both ends. Traffic would be largely access.

**Parkmore Drive**

This is a residential road parallel to Greenlea Road of about 100 houses. It is a cul de sac off Terenure Road West but has three connections to Greenlea Road which facilitate a small amount of through traffic. It is very narrow at its upper end where any on street parking makes passing problematic.

**Terenure Road West**

The right and left turn junctions at Greenlea Road are the most direct route to the Rugby Club from the City, Kimmage areas.

This is the busiest road in the area. It is largely residential with about 120 houses. There is a community school close to the village (467 enrolment), Presentation Primary school (491 enrolment) close to Greenlea Road and therefore there is substantial school related traffic. Again, the inevitable increase of traffic on this road, is a serious danger to our schoolchildren's health and safety.

The pavements are very narrow and this creates some degree of pedestrian hazard with the current traffic levels. It is particularly difficult for pedestrians to walk at the inbound bus stops. It is widely avoided by cyclists due to the high traffic and the camber of the road. There is virtually no parking on the road, as the road itself can barely carry two lanes of traffic and parking obstructs one lane.

There are currently two bus services on the road, the city bound 15A and the orbital 17. This will increase to three bus services under Bus Connects with an S4, 74 (a new service) and 81.

**The Laurels**

This is an estate of about 40 houses off Terenure Road West and affected by the issues on that road.

We have seen draft submissions from other local residents' groups (including Terenure West Residents Association and Orwell Park) and we are generally supportive of what they say in those drafts.

We would urge a proper consultation process taking into account our concerns and those of the vast number of local residents who are not in favour of this scheme.

Signed .....

Paul Candon - Chairman

TERENURE COLLEGE RUGBY FOOTBALL CLUB  
 'Lakelands'  
 Greenlea Grove  
 Terenure  
 Dublin 6W  
 D6W C660