

An  
Bord  
Pleanála

## Memorandum ABP-317660-23

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**To:** Board  
**From:** Fiona Fair, Senior Planning Inspector  
**Re:** Oral Hearing Recommendation for application under Section 51(2) of the Roads Act 1993 Application no. ABP-317660-23  
**Date:** 16<sup>th</sup> October 2024

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### Introduction

National Transport Authority have made an application under Section 51 (2) of the Roads Act 1993 as amended, for approval in relation to a proposed road development scheme. The proposed scheme is 1 of 12 no. bus corridor schemes under the Bus Connects programme and is accompanied by a Compulsory Purchase Order reference ABP 317682-23 for which there is a separate Oral Hearing recommendation. All of the 12 routes proposed within the Great Dublin Area, have now been submitted along with 1 application within Galway City.

### Description of Development

The proposed Kimmage to City Centre Core Bus Corridor (CBC) Scheme has an overall length of approximately 3.7 km consisting of three sections, (i) Lower Kimmage Road from Kimmage Cross Roads to the Junction with Harold's Cross Road; (ii) Harold's Cross Road from Harold's Cross Park to Grand Canal; and (iii) Clanbrassil Street Upper and Lower and New Street from the Grand Canal to the Patrick Street Junction.

The Lower Kimmage Road from Kimmage Cross Roads to the Junction with Harold's Cross Road section is approximately 2.2km long and commences on Kimmage Road Lower at the KCR Junction with Kimmage Road West, Fortfield Road and Terenure Road West running in a north-easterly direction. Priority for buses will be provided along the entire length of this section of the Proposed Scheme. A secondary cycle route is also designated, running parallel to Kimmage Road Lower, along Poddle Park, Bangor Road, and Blarney Park to Sundrive Road. From Sundrive Road, a new cycle connection to Mount Argus Way and Mount Argus View where a steel boardwalk structure is proposed beside the River Poddle at the Stone Boat feature.

From Harold's Cross Road and Harold's Cross Park the route proceeds towards the Grand Canal at Robert Emmet Bridge for a distance of 400 metres. Priority for buses will be provided along the entire length of this section of the Proposed Scheme, with retention and minor extension of the existing dedicated bus lanes along Harold's Cross Road. New segregated 1.5m wide cycle tracks are proposed in both directions along Harold's Cross Road. At the Grand Canal the route proceeds from Robert Emmet Bridge over the Grand Canal on Clanbrassil Street Upper and through to the Leonard's Corner Junction at South Circular Road, and then along Clanbrassil Street Lower and New Street South, until it reaches the junction with Kevin Street Upper and Patrick Street. At Robert Emmet Bridge over the Grand Canal, two new cycle/pedestrian bridge structures are proposed on either side of the existing arch bridge to provide footpaths and the northbound cycle track outside of the narrow bridge width. Priority for buses will be provided. New segregated cycle tracks will be provided in both directions along the full length of this section of the Proposed Scheme.

Specific works proposed within the development include the following:

- 7.4 km (two-way) of bus priority infrastructure and traffic management
- 8.0 km (total both directions) of cycling infrastructure and facilities
- Two new footbridges over the Grand Canal in Portobello.
- A new pedestrian/cyclist boardwalk structure over the River Poddle in Kimmage between Sundrive Road and Mount Argus Way.

- Provision of new/refurbished pedestrian facilities and footpaths along the scheme and associated ancillary works.
- Provision of 12 junction upgrades and associated ancillary works.
- Provision of 29 new/refurbished raised table side entry facilities.
- Reconfiguration of existing bus stops resulting in 23 number new bus stop facilities.
- Public Realm works including landscaping, planting, street furniture, street lighting, retaining walls, boundary walls and sustainable urban drainage (SUDs) measures.
- Roads associated earthworks including excavation of unacceptable material, importation of material, temporary storage of materials.
- Provision of road pavement, signing, lining and ancillary works.
- Provision of gates, fencing and boundary treatment works.
- Provision of new and diverted drainage infrastructure.
- Diversion of utilities and services including associated ancillary works; and
- Construction of accommodation works including boundary treatment and ancillary grading and landscaping work together with all ancillary and consequential works associated therewith.
- A total loss of 94 parking / loading spaces along the Proposed Scheme.

Four Bus Gates are proposed along the Proposed Scheme to ensure bus priority, as follows:

- Bus Gate No.1: On R817 Kimmage Road Lower, just north of the Ravensdale Park Junction.
- Bus Gate No.2A: On R817 Kimmage Road Lower, just south of Harold's Cross Park.
- Bus Gate No.2B: On R817 Kimmage Road Lower, at the northern end of Harold's Cross Park and
- Bus Gate No.3: On the R137 at the Harold's Cross Road and Kenilworth Park Junction.

The Construction Phase for the Proposed Scheme is anticipated to take approximately 18 months to complete. It will be constructed based on individual sectional completions that will individually have shorter durations typically ranging between 3 to 15 months. Various amounts of third-party lands will be required to be compulsorily acquired along the entirety of the route to facilitate the proposed development.

Three Construction Compounds for the Proposed Scheme will be located at land adjacent to the Proposed Scheme at a number of locations. The Construction Compounds will be located at the following sites:

- Construction Compound K1 at Sundrive;
- Construction Compound K2 at Our Lady's Hospice; and
- Construction Compound K3 at St. Patrick's Court on Clanbrassil Street Lower.

Construction Compounds will be used as the primary location for the storage of materials, plant and equipment, site offices, worker welfare facilities and limited car parking. The Construction Compounds will be secured to ensure the safe storage of all on-site materials and machinery. Temporary fencing will be erected and site security will be employed

### **Environmental Impact Assessment**

The NTA has submitted to the Board the Environmental Impact Assessment Report (EIAR) prepared in accordance with section 50 of the Roads Act 1993 (as amended) and Directive 2011/92/EU of the European Parliament and Council, 2011 on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 in respect of the proposed road development.

### **Appropriate Assessment**

A Natura Impact Statement (NIS) has also been prepared and has been submitted to the Board in respect of the proposed road development under Part XAB of the Planning and Development Act 2000 (as amended).

### **Third Party Observations**

84 no. third party submissions have been received and are summarised within Appendix 1 of this memo, 7 of which have requested an Oral Hearing. In relation to the content of the submissions it is of note that many issues raised are common to all of the submissions. For example a number of submission highlighting:

- Support for the project.
- Integral part of the transport solution for Dublin.
- Complies with National, Regional and Local Policy and Climate Action Plan 2024.
- Support for the bus gates, junction improvements, public realm, cycling facilities in Harold's Cross and Clanbrassil Street.
- Studies have shown that a reduction in through traffic helps businesses.

Also a number of submissions concerned with:

- Cumulative impact of all 12 CBC schemes not considered.
- Query the need and justification for the project.
- Concern alternatives such as Luas / tram, Metro, increased bus service, school buses, low emission buses, existing bus priority signals, park and ride facilities are not considered.
- Query benefits of the proposed scheme.
- Concern no consideration of what happens buses in the City Centre.
- Query the reliability of the traffic modelling, data counts and up to date nature of the information.
- Concern of traffic safety, redistribution of traffic to surrounding roads, congestion for local residents, longer journey times, impact upon emergency vehicles, loss of on streetcar parking.
- Concern of congestion, noise and pollution, anti-climate change.
- Concern of loss of trees and impact upon Harolds Cross Park and Stoneboat built heritage.
- Concern of impact upon biodiversity and wildlife systems.
- Concern of impact upon mobility impaired and elderly, footpaths too narrow, bus stops relocated inappropriately, non-continuous segregated cycle track and narrow width of cycle track.

- Concern of introduction of 4 Bus Gates and Turn bans.
- Concern of impact upon urban village of Kimmage.
- Concern urban realm improvements and paving is not to sufficient high standard.
- Concern of impact upon businesses, community, schools, hospitals, services and amenities.
- Concern of flawed / inadequate public consultation and contravention of Aarhus Convention.
- Concern of impact upon property values.
- Concerns raised with respect to the proposed construction compound K3 on the green area to the front of Grenville Place.
- Concern of loss of loading bays in Kimmage Village and on Clanbassil Street.
- Concern of proposed cycle route from Sundrive Road through Mount Argus Estate.

Other concerns relate to specific roads impacted by diverted traffic, right hand turn bans, potential for indirect physical impact to individual properties or other elements of the scheme.

### **Prescribed Bodies**

Submissions have been received from Dublin City Council and 2 no. prescribed bodies which are summarised hereunder. Submissions are generally in support of the proposed development and do not raise any significant issues in relation to the EIAR or NIS submitted. General comments are made in relation to works relating to the removal of vegetation, protection of Recorded Structures and Monuments and watercourses during construction works:

#### **1. TII**

- Acknowledges and supports the Busconnects project which aims to improve public transport and address climate change in Dublin and other cities.
- The proposed scheme does not include any direct interactions with the national roads or light rail (Luas) networks.
- No observations.

## **2. Department of Housing, Local Government and Heritage - DAU**

- The National Monument Service (NMS) has reviewed the EIAR and is broadly in agreement with the findings in relation to archaeology and cultural heritage.
- 4 no. conditions with respect to archaeology are recommended, they relate to:
  - Mitigation measures set out in the EIAR
  - CEMP
  - Project Archaeologist to be appointed.
  - Archaeological monitoring and any investigation work / excavation required.

## **3. Dublin City Council**

- In terms of planning policy, it is stated that the proposed development is in compliance with the RSES and is recognised as a development which will support regional growth for the Eastern and Midlands Region and the Dublin MASP. High quality bus corridors will enable and support the delivery of both residential and economic development opportunities.
- It is noted that the RSES supports the delivery of key sustainable transport projects including BusConnects as set out in RPO 5.2
- The proposal has been considered in relation to the core strategy of the Dublin City Council Development Plan 2022 – 2028 – sustainable movement and transport and other relevant policies.
- Policies of note include:
  - SMT1 Modal Shift and Compact Growth
  - SMT3 Integrated Transport Network
  - SMT4 Integration of Public Transport Services and Development
  - SMT8 Public Realm Enhancements
  - SMT11 Pedestrian Network
  - SMT22 Key Sustainable Transport Projects
  - QHSN11 15-Minute City
  - CEE12 Transition to a Low Carbon, Climate Resilient City Economy

- It is stated that it is not the role of Dublin City Council to comment on the acceptability or not of the EIAR and its findings, but it is noted, that the content points generally to the development having negligible impact on the existing environment.
- The NIS is acceptable, no concerns are raised in relation to the conclusion of the NIS.
- The proposed scheme will, for the most part, will comprise lands within the existing public road and pedestrian pavement area where there is no specific zoning objective. The areas required for Construction Compounds will be for a temporary period. Reinstatement works will be carried out following construction.
- Dublin City Council is satisfied that the elements of the proposed development which fall within the Council boundary would not have any excessive or undue impact on the amenities of the area.
- It is acknowledged that there will be a degree of disruption in terms of traffic management during construction but thereafter there is unlikely to be adverse impact on existing amenities.
- There will be a need for sharing of space including kerbside space, which will need to be managed to ensure that there is no undue adverse impact on the ability of residents and visitors to access local services on foot or on the ability to achieve the '15-minute city'.

#### Forward Planning Department Comments

- The scheme is supported by the high-level policies in place in the Dublin City Development Plan 2022-2028

#### City Archaeologist comments:

- The scheme runs adjacent to the River Poddle for much of its length and passes through a number of Zones of Archaeological Potential for Recorded Monuments which are listed on the Record of Monuments and Places (RMP) and are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994.



- The scheme will also impact sites listed on the Dublin City Industrial Heritage Record. Archaeological mitigation in these areas will be required where subsurface excavation is proposed.
- The proposed construction of a boardwalk along the River Poddle will have a direct and permanent impact on the setting of Recorded Monument DU018-043003, known as the 'Tongue' or 'Stoneboat'.
- In total the EIAR identifies impacts on one site designated as a National Monument, eight sites listed on the Records of Monuments and Places (RMP), and five sites listed on the Dublin City Industrial Heritage Record (DCIHR). There is also a potential impact on one non designated cultural heritage site.
- Recommends a redesign of the deck / boardwalk to highlight the Tongue, perhaps incl. glass or similar transparent panels directly above it to ensure visibility.
- Recommends that the section of the route at Robert Emmett Memorial Bridge be considered for redesign with a view to reducing impact on the visual setting of the bridge, retaining historic walling and allowing pedestrian access to the Robert Emmett memorial safely.

Parks, Biodiversity and Landscape Services Comments:

- Parks is not supportive of a proposal that provides a route through Ravensdale (Paddle) & Mt. Argus Park's for commuting cyclists whose speed will be at odds with the public using the Park's. In addition, it is noted that the Park is locked at night.
- There is lack of detail relating to the width of the proposed cycle path within both parks but the current footpath width of 2m will be insufficient for a shared scheme and will necessitate constructing a new two way cycle-way to avoid conflict between cyclists and pedestrians.
- The construction of a two-way cycle path through the root zone of the existing trees will cause damage.
- Planning permission has already been granted for the incorporation of a Flood Alleviation scheme in Ravensdale (Paddle) park. The combined effect of the flood alleviation scheme and the proposed cycleway will result in

further fragmentation, damage to the existing tree canopy and alter the character of the park to its detriment.

- A suggested solution would be for cyclists to remain on the Kimmage Road Lower rather than detour through the park- for cyclists travelling to city centre/Kimmage village this is the most direct route and will link up with the proposed cycle track which is on road from Ravensdale Park junction.
- The proposed cycle track through Mt Argus Park appears to involve the construction of a new bridge and travel through an area of trees that have not been surveyed. The impact on these trees of the new two-way cycle path and bridge construction should be clarified.
- Concern of the detail on plans submitted, lack of clarity where footways and kerbs are getting reduced or widened, no street lighting or signage is shown on the GA or landscape plans.
- Specific comments include:
  - Welcome tree planting on KRL.
  - Potential to daylight the short section of the Poddle River should be an objective rather than retaining car parking at the 'Poddle Cycleway' area.
  - Proposals of tree planting on existing river culvert should be reviewed
  - To maintain the visually open quality at Mount Argus View entrance (below) the new tree planting shall be reduced to four fastigiate oaks on the outer grass margins.
  - The visual quality of the Mount Argus entrance would be improved by the introduction of natural stone paving, rather than extensive areas of concrete and by a reduction in the proposed car parking spaces on either side of the entrance. The existing bicycle stands should also be retained or repositioned in the scheme.

City Architects Department comments:

- Welcomes the proposal in principle.
- The design of the public realm will be fundamental to the success of the Proposed Scheme.

- The design needs to be supported by pedestrian traffic counts. Footpaths should be designed to be universally accessible and pedestrian environments enhanced.
- All historic fabric and features should be retained and protected, and the settings of protected structures and buildings within Architectural Conservation Areas (ACA's) should be respected insofar as possible within the Proposed Scheme.
- The inclusion of an overlay of existing survey drawings onto the General Arrangement Drawings as submitted for the Kimmage to City Centre Core Bus Corridor Scheme would have facilitated a better assessment of the impacts of the proposals on the existing public realm.
- As this route involves works to and/or adjacent to Protected Structures their curtilage incl. Historic Fabric and within Conservation Areas, the applicant is to confirm that all works proposed must comply with Part IV of the Planning and Development Act 2000. This includes guidelines under S.52 (1) for the protection of structures, or parts of structures, and the preservation of the character of architectural conservation areas.
- Bus shelters impact on the width of footpaths and should only be proposed where there is sufficient space to physically accommodate them and passengers congregating in their vicinity. It is unclear if there is sufficient width to the footpaths in some locations where bus shelters are proposed e.g. the proposed south bound bus stop and bus shelter on Harold's Cross Rd to the west side of Harold's Cross Park, {Sheet 06}, and the proposed north bound bus stop and bus shelter on Clanbrassil St Upper, (Sheet 08).
- Request that by condition, full details of the design and type of each bus shelter for each location shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development
- Recommends conditions of compliance for Bus Shelters, utility cabinets, on-street parking, palette of materials, palette of street furniture, boundary treatments, new pedestrian and cycle bridges, conservation, stoneboat Boardwalk, art strategy, painted medians, traffic signals and signage poles, public lighting, water drinking fountains and village signage.

## Conservation Section

- Sets out the policy of DCC with respect to Conservation & Trees.
- Refers to Architectural Heritage Protection Guidelines for Planning Authorities (2011)
- Sets out guidelines and technical advice for street furniture, paving and kerbing.
- The Conservation Section finds that a thorough study of the receiving environment has been carried out.
- The assessment of architectural heritage, streetscape and the urban environment submitted as part of the EIAR and the proposed mitigation measures across the scheme is generally welcomed.
- Appendix A16.1 Historical Background provides a detailed and well-researched discussion on the history of the development of the route.
- Appendix A16.2 Inventory of Architectural Heritage Sites provides a written and photographic record, importance rating and sensitivity rating for all protected structures, NIAH-recorded structures, designed landscapes, unprotected structures of built heritage significance, street furniture, paving and surface treatments. The record is comprehensive and accurately describes the quality and status of the heritage structures along the proposed route.
- Appendix A16.3 Methodology for Works Affecting Sensitive and Historic Fabric, Section 3.2.1 provides a statement on protection of architectural heritage structures and features during works. 'Some architectural heritage features will require protection during the course of works, where there is potential for damage of sensitive fabric during the course of works proposed in close proximity to them.
- Historic or sensitive fabric will be recorded in position prior to the commencement of construction works, protected, and monitored for the duration. Appropriate protections will be determined depending on the nature of the fabric and the construction activities. Protective measures will include cordoning off as appropriate and/or the provision of protective wrapping or temporary hoardings or boxing off More specific protections are outlined in the relevant sections of this methodology'.

- The following are considered by the Conservation Section to be the key impacts of the Kimmage to City Centre route in relation to architectural heritage: Each is considered in detail in the submitted report.
  - Protected Structures and their settings.
  - NIAH Structures and their settings
  - ACA's
  - CA's
  - Industrial Heritage Sites.
  - Potential impacts on historic paving and kerbing, historic street furniture and lamp standards and other features.
  - Lamp Posts and Tram Standards
  - Milestones
  - Other Street Furniture / Finishes
  - Proposed Tree Removal
  - Boundary Treatments
  - Cycle Lanes
  - New Traffic Semaphore & Signage
  - Proposed Bus Stop Locations
- Conditions are recommended

#### Environment and Transportation Department Comments

- Generally supportive of the proposed scheme.
- Scheme will remove bicycles from bus lane and therefore improve speed of bus service.
- Dublin City Council recognises that the bus is the most important mode of public transport in Dublin and it is stated that in 2019, almost 160 million journeys were made by bus in the Dublin Region, representing 65% of all public transport trips in the Dublin area.
- It is stated that the DCC/ NTA cordon count in 2019 showed that the bus was the single highest mode of transport crossing the canal, 30% of all trips, and the bus accounted for over half of all public transport trips into the city centre.
- The return of bus passenger number to above pre covid levels is noted and the increase of Bus use at weekends of 27% over the pre covid levels, is also noted, as very welcome.

### Traffic Division Comments

- Supportive of the proposal and recognises the significant improvements in terms of safe cycling measures and in enabling an efficient public transportation service along the route.
- It is essential on all BusConnects corridors to ensure that the bus service is given priority.
- DCC states that links to bus information in relation to traffic flow management will be upgraded to improve this service and ensure free flow for buses. This digital improvement is necessary to ensure the scheme operates to its full potential.
- The DCC centralised traffic control system has for a number of years been linked to the bus automatic vehicle location system via a bespoke software called DPTIM and this link provides details of the bus location, its journey pattern and if the bus is ahead or behind schedule. For the BusConnects project this system is being upgraded to link to the next Generation Automatic vehicle location system which will allow finer grain information to be transmitted to the DCC system for dynamic management of the corridor.
- DCC have carried out modelling work to mimic the real-life operation of the project.
- It is stated that the design of this scheme is difficult and complex and has called for multiple interventions along the road network in order to achieve its objectives. The use of bus priority signals, bus gates and a combination of one-way systems and turn bans are all intended to alter the current traffic situation along the route and ensure that public transport, walking and cycling can be prioritised over the private car.
- DCC recommends that the corridor needs to be considered as a whole and that the various different measures to prioritise public transport walking and cycling, need to be implemented in as full a manner as possible to avoid "watering down" the benefits of this scheme by making localised changes to the design.
- Camera based bus lane enforcement will need to be rolled out.

- The enhanced data garnered by DCC from the next Generation AVL system and the next generation Bus priority system currently being specified will play a key role in how the corridor is dynamically managed to ensure that the bus journey times and headways are met.
- Digital infrastructure along with the proposed civil infrastructure for traffic signals are both required for the corridor to meet its objectives.

#### Road Division Comments

- The Roads Department is generally supportive of the scheme and its intention to improve bus and cycling provision.
- Scheme should seek to ensure sufficient and appropriate footpath widths of minimum 2 m and seek to improve pedestrian connectivity to bus stops and ensure pedestrian priority for people with accessibility issues incl visual impairments.
- Ensuring pedestrian priority is important particularly in the context of people with accessibility issues including visual impairments. Pedestrians, in accordance with all levels of policy, should be ensured priority through signage and other appropriate measures.
- Safeguarding the ability of local services to operate is imperative. The extent of loss of loading bays is not clearly quantified in the schemes, nor is the adequacy of alternative provision demonstrated. More information and clarity in this regard would provide comfort that the scheme will continue to support the operation of local businesses. In addition to loading facilities, on street parking is also affected including at commercial units.
- The location of proposed trees on the west side of Kimmage Road Lower needs to be carefully considered so as to minimise obstruction of footpath. A minimum of 2m clear unobstructed width is required.
- The location of proposed trees needs to be carefully considered so as not to obstruct the footpath. A minimum of 2m clear unobstructed width is required. Proposed trees should also not impede sightlines. Car parking appears to be proposed too close to the Sundrive Road junction on both sides. This should be further set back from the junction as well as from pedestrian crossings.
- At the revised junction layout of Mount Argus View and Kimmage Road Lower tree planting should take cognisance of sightlines and ensure unobstructed

footpaths. At the revised Mount Argus Church junction the location of trees and parking should not be too close to junction. Parallel parking is preferred to perpendicular for safety reasons.

- It is noted that a loading bay is proposed inside the bus gate. Signage should possibly clarify that loading is also permissible as well as local access.
- The submitted drawing does not appear to take cognisance of the St. Clare's Park development including its access junction layout. There is a current proposal to relocate the existing bus stop southwards away from the St. Clare's junction. The new position has been agreed between the developer, Dublin City Council and the National Transport Authority.
- There are serious concerns regarding the removal of the footpath along the southern boundary of Harold's Cross Park and the absence of crossing facilities for pedestrians to link to the opposite footpath. It is proposed that the footpath ends abruptly. However, pedestrians are not directed to a crossing point which would allow them to safely access the southern opposite footpath. Proposed trees within footpaths should be sited so as to ensure minimum 2m unobstructed footpath.
- Proposed access arrangements to the new car park within Our Lady's Hospice grounds are not clear. It is also not clear what is proposed regarding the main access arrangements to the Our Lady's Hospice campus from Harolds Cross Road. It would appear that the footpath is being extended across the junction with a cycle lane adjacent therefore it is not clear how vehicular access is being provided at this location. The submitted documentation indicates that this car park will be available for residents along Harolds Cross Road. However, it is not clear how this could be managed having regard to the fact that the car park is to be located within a private site and be accessed from a private road. For Dublin City Council to manage the car park including public access to same, it and the access road would have to be taken in charge by Dublin City Council.
- At the revised Mount Drummond Junction an alternative car parking arrangement should be considered in the redesign. Parallel parking is preferred to perpendicular parking for safety reasons. Parking should also be located further away from the junction.



### Environmental Protection Division

- It is stated that the principles of Sustainable Drainage Systems (SuDS) should be integrated with all other environmental aspects of the project, using best practice solutions.
- It is stated that the development must comply with the Greater Dublin Regional Code of Practice for Drainage Works.
- Enclosed drainage channels such as slot drains or "ACO" drains are not acceptable.
- Hybrid gullies are not acceptable.
- The use of narrow profile gullies is welcome.
- It must be confirmed that the development has been designed such that risk of flooding has been reduced as far as is reasonably practicable.
- The proposal must demonstrate that it passes the three stages of the SFRA Justification Test, particularly for fluvial flooding.
- New compensatory SuDS measures should be close to any green areas lost.
- With respect to the Wastewater Framework Directive: The report notes that the developer shall provide an evidence-based assessment of the impact, if any, of the proposed scheme on the water quality status of both rivers within the curtilage of the proposed project, including both ecological and chemical status.

### Overall Recommendation / Conditions

- Appendix 1 of the DCC report sets out agreed conditions between NTA and DCC. In respect of:
  - Handover: Comprehensive agreement of handover to NTA and hand back process.
  - Consultation between Departments.
  - Design
  - Reinstatement
  - Construction period.
  - Miscellaneous: Cellars
  - Public Lighting
  - Environmental Protection: Drainage
  - Archaeology

- NTA to appoint a Project Archaeologist as a member of the NTA project team to oversee all archaeological aspects of the project from inception to completion. The Project Archaeologist will manage archaeological aspects of the project and input on, inter alia:
  - Project planning and design,
  - Scheduling of archaeological mitigation,
  - The development of programmes,
  - The development of construction and procurement strategies,
  - The preparation of contract documentation,
  - The appointment of competent consultant archaeologists,
  - Advance works, construction and potential operational issues.
- Parks, Biodiversity and Landscape Services
  - Tree Bond
  - Landscape scheme
  - Tree protection
  - Bat and bird conservation
  - NIS
- Air & Noise Pollution
  - Works to be carried out in accordance with a CEMP.
- Conservation
  - All works shall be designed and supervised by an expert in architectural conservation in accordance with the provisions of the Dublin City Development Plan 2022-2028, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and relevant documents of the DHLGH Advice Series.

- All works shall be carried out in accordance with best conservation practice, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of the Housing, Local Government and Heritage. All repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement.
- A redesigned scheme at Robert Emmet Bridge that is of higher architectural quality than the submitted proposal and that would lessen the physical and visual impact on the historic masonry bridge shall be submitted for the written approval of the Planning Authority in advance of works commencing. New work and materials should be of the highest possible architectural quality, should complement the historic features of the bridge and should be legible as new interventions. This redesign shall be informed by a revised architectural heritage impact assessment, by a suitably qualified conservation professional, providing detailed design information and outlining the nature and likely impacts of the proposed bridge extension.
- The concealment/ burial of historic walls at Clanbrassil Street Upper is not appropriate.
- The Conservation Section recommends the omission of bus shelters in front of and in the immediate vicinity of Protected Structures across the route and for bus stops only to be considered at these locations, in order to minimise visual clutter and protect the special

architectural character of Protected Structures.

○ Architecture

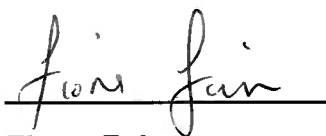
- Footpath widths are sufficient.
- Detailed drawings and specifications of the proposed public realm improvement schemes shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
- Taking in charge agreement.
- Details of design and type of each bus shelter.
- Engagement with EV operators.
- Sustainability and re use of fabric.
- Revised proposals for the Emmet Bridge
- Further information is required on the design of the Stoneboat Bridge/ boardwalk, measures to address any potential anti-social behavior and a full landscaping proposal are to be submitted and agreed with DCC Planning department prior to commencement of development.
- Planting
- Signage.

**Recommendation**

I have examined all of the submissions received, the NTA's response to the submissions and all of the documentation submitted with the application and I have considered all of the foregoing in relation to the Oral Hearing checklist which is appended to this memo within Appendix 2. The information provided within both the application documentation and the response to the submissions provides detailed information pertaining to the proposed works and how such works will affect individual properties, the wider environment, and the functionality of the road space in terms of traffic volumes, speed, carrying capacity and all other issues relating to a multimodal road scheme.

I am satisfied that the information submitted is of sufficient detail to allow for a full and proper assessment of the case. I therefore consider that the proposed development can be adequately assessed without recourse to an oral hearing.

In the absence of an Oral Hearing being held, I consider it prudent to permit a final round of circulation in relation to the applicants' responses to the submissions received. This document addresses each submission individually in detail and given the level of information provided within it, I consider it important to provide third parties with an opportunity to consider the NTA's responses and submit further written comments if deemed necessary.

A handwritten signature in cursive script, appearing to read 'Fiona Fair', is written over a horizontal line.

**Fiona Fair**

**Inspectorate**

**18 October 2024**

## **Appendix 1**

### **1. Ann O'Connell (52 Derravaragh Road, Terenure)**

- Concerns from residents of Derravaragh Road and Corrib Road, signed by 6 residents.
- Concern of set of bollards at junction of Derravaragh and Corrib Roads which will block easy access to Terenure village.
- Concern of traffic congestion on Kimmage Road.
- A turning restriction would be more appropriate to retain access for locals.
- Concern bollards are unsightly and unnecessary.
- If bollards are permitted they should comprise planter boxes and this should be repeated at the Derravaragh / Aideen junction.

### **2. Anna Rackard (91 Corrib Road)**

- Same concerns as expressed above at submission NO. 1
- Concern of impact upon Sundrive road / Larkfield traffic lights.
- Concern of congestion on Corrib Road.
- Traffic management measures such as road restrictions at certain times of the day would be more effective way of diverting traffic from using Hazelbrook Road / Corrib Road / Derravaragh Road.

### **3. Anne O'Flaherty, 28 Greenmount Close**

- Concern of noise pollution.
- Concern of impact upon health of residents – air pollution.
- Concern of loss of bus stop close to residence.
- Road widening will bring noise and traffic closer to residences.

### **4. Brendan Heneghan**

- **Request that an OH be held**
- Concern of implementation of 4 bus gates
- Concern of hours of operation of bus gates and bus corridor.
- Concern traffic analysis and projections stack up.
- Concern inadequate projection for cyclists

- Concern of consultation process and requirements of Aarhus Convention and in particular Kazakhstan advice related to pandemic conditions.
- Concern of procedural issues incl. failure to place notices as agreed and failure to place all documents on the public file.
- Concern of traffic displacement to residential streets.
- Negative impact upon villages, in particular, Kimmage village.
- Concern of congestion and longer trips for locals and residents.
- Concern of proposals for tree planting at Corrib Road.
- Concern of CPO of lands opposite the Hospice.
- Concern of access to Mount Jerome Cemetery.
- Concern of loss of left turn slip at KCR
- Concern of dangerous right hand turns at Fortfield Road
- Concern of impact upon historic walls at Emmet Bridge.
- Concern of impact upon the Poddle River.
- Concern that the NTA funded certain individuals to get consultants expert opinion / professional advice in respect to the proposed Charlemont Station development.
- Issues of general application covered in other submissions on other CBC Routes.
- Concern of contravention of statutory plans.
- Concern of necessity of the scheme.
- Accompanied with appendices relating to an internal review request on FOI 2023-0134 -Kimmage Corridor.
- Accompanied with Gmail's sent to self, recording bus trip details.
- Accompanied with newspaper clippings referring to Bucconnects.
- Concern inaccurate and unreliable information used in analysis.
- Accompanied with photographs.
- Concern excessive use of busgates, disproportionate.

**5. Caitriona Dempsey, 1 Mount Argus Square.**

- Concern of proposed cycle path from Sundrive Road through Mount Argus Square / estate.
- Concern of antisocial behaviour, safety and security issues.
- Concern cycleway is unnecessary.
- Loss of cultural heritage.
- Lack of consultation and analysis of where cycle paths in enclosed estates work for the communities.

- Concern of increased speed of bicycles.
- Concern of loss of biodiversity from new cycle connections.

**6. Capital Glass Company Ltd. (61A & 62 Lower Clanbrassil Street)**

- Concern of impact to long established glass business.
- The business gets weekly collections by large trucks to recycle broken glass.
- Concern of lack of consultation.
- Concern skip use will be impeded.
- Concern business will be severely impacted.
- Concern community based shop will be severely affected.

**7. Carol Michael, 23 Greenmount Close, HCR**

- Concern of noise pollution.
- Concern of impact upon health of residents – air pollution.
- Concern of loss of bus stop close to residence.
- Road widening will bring noise and traffic closer to residences.

**8. Ciaran Coffey (436 Clonard Road)**

- Concern of closure of Ravensdale Park and Poddle Park to vehicular traffic.
- Increased traffic on residential roads.
- Concern of traffic diversion and impact on the proposed cycleway.
- Safety concerns at Sundrive Road
- Social equity considerations – closure of road linking D12 and D6

**9. Cllr Anne Feeney City Hall**

- Support the development of more user friendly and environmentally sensitive transport solutions.
- Needs to be considered in conjunction with Templeogue / Rathfarnham bus connects scheme.
- Proposal needs to be considered in conjunction with Dublin City Council Development Plan, Volume of HGV's and cars diverted onto narrow residential roads, local access for residents and small businesses, capacity of Guards to enforce bans along with other considerations.
- Query the justification and effectiveness of the proposal.
- Query the locations of the bus gates and their hours of operation.
- Bus gates on Kimmage Road Lower are unnecessary.
- Concern the proposal is over engineered.



- **Request that an OH be held.**

#### **10. Cllr Carolyn Moore, City Hall**

- Support for Bus Connects
- Integral part of the transport solution for Dublin
- Proposal accords with National, Regional and Local Policy.
- Delivers on commitments for Climate Change and delivers commitments set out in the Climate Action Plan.
- Acknowledge the public consultation held by the NTA and also the limitations due to Covid.
- Acknowledge concern of the quality and inclusiveness of the consultations which took place in 2020, with a lack of clear, accessible information from the NTA.
- Important placement and public realm is considered, esp. in Kimmage.
- Green roof designs should be considered.
- Pedestrian infrastructure should be improved and be in line with DMURS.
- Cycling infrastructure should be 24 hour, concern of gap in the infrastructure in Kimmage village.
- Need to reduce potential for conflict between cyclists and pedestrians.
- Concern of cycle path widths proposed, which are less than 2m and 1.5m in some instances.
- Where road sharing is necessary the 30kph speed limit should be enforced.
- Imperative enforcement and monitoring of bus lanes, gates and new traffic measures is carried out.
- Important biodiversity is protected. Retention of mature trees is important.
- Concern of lack of cumulative traffic modelling.
- Concern of access for local residents to adjacent urban centres.
- Expedite the work needed to initiate camera based enforcement.

#### **11. Cllr Pat Dunne & Joan Collins TD and Others**

- Accompanied with a petition.
- In general support public transport improvements.
- Main concern of the restrictions to through traffic at the proposed Bus Gate No. 1 north of Ravensdale Junction
- Concern of displacement of traffic into residential areas of Crumlin / Kimmage.

- Concern the bus gate will turn Lorcan O'Toole Park and Stannaway Road into the main thoroughfare for vehicles travelling to Sundrive, Mount Argus and Mount Jerome and onwards to the canal.
- Concern of rat running on local roads.
- Call on ABP to request additional information on mitigation against increased through traffic.
- Call for a plebiscite to be carried out among the residents of Poddle Park at the junction with Ravensdale with respect to road closure.
- Creation of permeability from Sundrive Road through Mount Argus by removing part of a wall at the stone boat feature is welcomed.
- No changes should be made until the bus routes are operational.
- Resident engagement with the NTA and monitoring on an on-going basis is crucial, pre and post introduction of changes.

#### **12. Cllr. Punam Rane**

- Support the Bus Connects programme.
- Support residents fears of increased through traffic and congestion.
- Acknowledge the concern of residents to diverted traffic at Ravensdale Park.
- Concern of access for residents to services and difficulty accessing their houses.
- Concern of access to businesses.
- General wider concern about accessing Mount Argus Church and Mount Jerome Cemetery.
- **Request that an OH is held.**

#### **13. Colin Price & Aileen Price**

- Concern of access / Bus Gate at the junction of Ravensdale Park and Lower Kimmage Road.
- More flexibility needed at Ravensdale.
- Submit that the hours & days of operation of the Bus Gate should be reconsidered, 7 days a week would be problematic.
- Hours of operation should align with actual peak traffic. (7:00 – 9:30 & 16:00 – 19:00)
- Concern of loss of car parking on Kimmage Road Lower.
- Submit that the 52 parking spaces from no.'s 177 – 199 Kimmage Road Lower are privately owned, there has been no engagement with NTA regarding these spaces.

#### **14. Cornelia Rafferty (52e Mount Argus Road)**

- Concern of removal of footpath at the southern end of Harolds Cross Park.
- Concern removal of the footpath will impact and destabilise mature trees within Harolds Cross Park.
- Concern the proposal prioritises cars and traffic flow over pedestrians and is contrary to stated objectives and aims of the scheme and national guidelines.
- Concern of loss of historic kerbing and negative impact upon historic park.
- Proposal to remove the footpath is contrary to DMURS
- Concern proposal will hinder attempts to increase walking & cycling to schools.

#### **15. Corrib Road Residents c/o Mary McCabe 85 Corrib Road**

- Concern of restriction of or interference with existing right of way on Derravaragh Rd. / Corrib Road.
- Concern of Kimmage Road Bus Gate and impact upon Corrib Road residents travelling towards KCR (No.'s 1 – 107 Corrib Road)
- Concern of impact of no right turn at Aideen Ave and Kimmage Road on residents of Corrib Road, allowance and special rights should be afforded to residents to make the right turn.
- Concern of impact upon local community shops at Junction of Corrib Road and Kimmage Road Lower.
- Concern of bus corridor operating times and days. Introduction of a bus gate 7.00 am to 8.00 pm is not practical.
- Signed petition attached.

#### **16. Daniel Martin Apt 60, Grenville Place.**

- Concern of land take of two green areas to the front of Grenville Place, in the ownership of Ardross Management Co. CLG
- Concern of location of a construction compound K3 on the lands.
- Concern of anti-social behaviour and security issues.
- Concern of impact upon access and fire escape from apartments.
- Concern plan to plant 4 large trees, in the green area, after the construction period will block light to windows of the apartments and overshadow.
- Concern trees to be planted are unsuitable.
- Photos attached to the submission.

#### **17. Dawnlane Limited, 31 Clanbrassil Street Dublin 8**

- Concern Public Notice is inaccurate.

- Concern Environmental Impact Assessment is deficient, material assets fails to consider Dawnlane Limited which is a waste and scrap recovery business.
- Concern the works proposed are not adequately described or designed.
- Concern of the impact to 31 Upper Clanbrassil Street.
- Concern proposal is contrary to the Environmental Impact Assessment Directive.
- NIS cannot adequately assess effects as the scheme is not adequately designed.
- Concern proposal is contrary to Habitats Directive, in the absence of identification of effects.
- Concern information is flawed.
- The scheme does not identify likely effects on Dawnlane Limited lands or business.
- Concern of reference to hazardous waste and 'unacceptable material' as referred to in the public notice.
- Concern access to lands will be extinguished and impact upon property rights.
- Concern that the Board will engage appropriate specialists to consider the full range of impacts on noise, air emissions, surface and ground water as well as ecology.
- Concern of lack of detail incl. design, drawings, detailed plans, elevations, levels.
- **Request that an OH be held.**

#### **18. Deirdre Pender, 33 HCR**

- Concern of front boundary wall being replaced.
- Concern land take from 33 HCR to 61 HCR is justified.
- Concern of interruption to bus routes.
- Concern of introduction of multiple bus gates.
- Concern of different operational times of bus gates.
- Concern of displacement of private car traffic to surrounding streets, in particular past schools.
- Concern of impact upon local businesses and local access
- Concern of impact upon local villages and communities.
- Concern of narrow footpaths and error on drawings showing loss of parking spaces at the Park close to Mount Jerome / Russian Orthodox Church and access to Mount Argus Road. There are currently no car parking spaces on the park side of the road.

- Concern of non continuous cycle paths.
- Consider the design of the footbridges could be more decorative.
- Concern of inadequate surface water drainage on HCR outside of the observers house, additional shores are required.
- Request that ample notice of all works are conveyed to residents, in advance of works commencing.

#### **19. Department of Housing, Local Government and Heritage - Development Applications Unit (DAU)**

- The National Monument Service (NMS) has reviewed the EIAR and is broadly in agreement with the findings in relation to archaeology and cultural heritage.
- 4 no. conditions with respect to archaeology are recommended, they relate to:
  - Mitigation measures set out in the EIAR
  - CEMP
  - Project Archaeologist to be appointed.
  - Archaeological monitoring and any investigation work / excavation required.

#### **20. Dr Nichola Walsh & Mr. Kealan McGuinness**

- Concern of plan to block access to Corrib Road from Derravaragh Road
- Concern of negative impact to residents of Corrib Road.
- Concern of longer journey time and congestion.
- Concern of limited access to Terenure Village.
- Concern of impact upon property prices.
- Preferable to restrict access on Terenure Road West.

#### **21. Dublin City Council**

- See prescribed bodies section of this report above for detailed summary of DCC observation.

#### **22. Dublin Commuter Coalition**

- Support Busconnects project
- Project route requires redesign.
- Need for enforcement and cameras to ensure enforcement.

- Bus lanes and Bus gates should be operational 24/7 hours.
- Two stage crossings for pedestrians should be omitted.
- Pedestrians need to be prioritised and junctions need to be in compliance with DMURS.
- Concern sufficient segregation for cyclists is not provided at the following junctions:
  - Ravensdale Road / Kimmage Road Lower
  - Mount Argus View / Kimmage Road Lower
  - Harolds Cross Road / Kimmage Road Lower
- Concern of safety of bus stop design and width of bus stop islands.
- Cycle track running in front of bus shelters should not be permitted.
- Shared space for pedestrians and cyclists causes conflict and is of concern.
- Concern junctions are not in compliance with DMURS
  - Mount Argus View / Kimmage Road Lower
  - Harolds Cross Road / Kimmage Road Lower
  - Harolds Cross Road / Parkview Avenue
- Concern that cycle parking provision is not included in the proposal.
- Concern scheme lacks segregation of cyclists from motor traffic along Ravensdale Park, Kimmage Road Lower, Sundrive Road and Harolds Cross Road.

### **23. Dublin Cycling Campaign**

- Support for the scheme.
- **Request an OH**
- Needs to ensure that the needs of the large 'interested but concerned' cohort of cyclists are met to provide modal shift.
- Concern all works are compliant with universal design for cycling.
- Welcome design interventions such as provision of cycling facilities along the main CBC corridor, bus gates operational at peak times from KCR to Harolds Cross, provision of new canal bridges at Emmet Bridge, new bus stop by-passes along sections of Kimmage Road Lower, Harolds Cross Road and Clanbrassil Street, provision of segregated cycle tracks on Harolds Cross Road, addition of quiet way along the Poddle and through Mount Argus, removal of cycleway through Ravensdale Park, improved pedestrian and cycle facilities at the KCR junction and the removal of slip roads.
- Consideration needs to be given to cycle track widths – minimum 2.0m

- Concern of lower quality intermittent cycle lanes on the Lower Kimmage Road.
- Concern of removal of advisory cycle lanes and replacement with car parking spaces.
- Concern operational hours of the bus gate does not align with school closing times, bus gate should operate during the time periods when children are travelling to and from school.
- Filtered permeability is a welcomed approach.
- Quiet Street Treatment is welcomed.
- Dutch Guidance as per CROW Design Manual for Bicycle Traffic should be adhered to.
- Welcome the role out of 30 Kph speed limits.

#### **24. Eilish Kenna, Hazel park**

- Concern with respect to Bus Gate and bus commuting.
- Concern of circuitous routes and congestion.
- Concern bus journey more complicated and longer.
- Plans are confusing and poorly communicated.
- Ravensdale Bus Gate is a major inconvenience to residents
- Concern of loss of access to shops, services and amenities.
- Concern delivery trucks and bin collections have been adequately considered.

#### **25. Eilish O'Brien, Derravaragh Road**

- Concern of blocking off of Derravaragh Road and Corrib Road.
- Concern of set of bollards at junction of Derravaragh and Corrib Roads which will block easy access to Terenure village.
- Concern of lack of consultation with residents.
- Concern of €50 fee for submission.
- Proposed bollards will cause traffic bottleneck and congestion.
- Concern of delays to residents who travel to St. Vincents Hospital, Blackrock Clinic and Beacon Hospital and University College Hospital.
- Concern of traffic congestion on Kimmage Road.
- A turning restriction would be more appropriate to retain access for locals.
- Require road access to take elderly parents to hospital appointments

- Concern bollards are unnecessary and will add significantly to journey times.
- Request that bollards are not permitted. Turning restrictions at specific times could be considered as an alternative.

**26. Eoin Duggan, 7 Mount Argus View**

- Concern of proposed cycle lane from Sundrive Road through Mount Argus Estate.
- Concern of removal of walls at Mount Argus to facilitate cycle path.
- Question necessity of the new proposed cycle path
- Lack of consideration of past experience with respect to security issues, and community spirit and safety.
- Concern of increase in anti-social behaviour.
- Concern of increased danger to cyclists due to severe bends in the design.
- Lack of consultation and evidence showing where cycle paths in enclosed estates work for the community
- Loss of biodiversity
- Loss of cultural heritage, impact of boardwalk upon stone boat feature

**27. Estrella Vaquero, 44 Clanbrassil Street.**

- Concern with regard to location of bus stop No. 1290 placed at the front door of entrance at 2.7m @ 44 Clanbrassil Street.
- Concern at NTA proposal to initially move the bus stop further up the street, in 2019, and then change the proposed location.
- Concern of loss of privacy, security issues and antisocial behaviour.
- Concern of accidental claims against their property.
- Concern of blockage of access to property.
- Concern of noise and nuisance, vandalism and graffiti.
- Photographs attached.

**28. Gailot et Grey c/o Emma Grey, 59 Clanbrassil Street**

- Concern of loss of revenue
- Concern of increased traffic on adjacent streets.
- Safety Concerns
- Potential job losses.
- Consideration should be given to accommodating businesses:



- Designated loading zones
- Delivery windows
- Logistics hubs
- Pedestrianised zones
- Modern technology integration.
- Engagement with business community
- Signage and wayfinding
- Promote off peak deliveries.

**29. Gerard and Michelle Madden, 19 Mount Argus Court**

- Same points raised as those summarised above in submission No. 26 Eoin Duggan.

**30. Gill Ventures Ltd – Halal Food and Grocery, 60 / 60A Lower Clanbrassil Street**

- Concern of proposal for a 24 hour bus corridor on Clanbrassil Street.
- Lack of consultation with local businesses.
- Concern of impact upon accessibility of business.
- Concern of impact upon loading and unloading, safety issues.
- A survival option could be an unrestricted loading bay.

**31. Gordon's Fuels (Mr. Barra Gordon and Mrs Suzanne Gordon, 32A Clanbrassil Street Upper**

- Concerning Plot List 1022(1).1a Easement Plot List CE
- Concern to Plot List 1021(1)1c, 1021(2)1d, 1021(3)1z, 1021(4)2c, 1021(5)2d, 1021(6)2z. Easement Plot List CD
- Concerning 0.25 Ha (0.63 Acres) at Canbrassil Street Upper.
- The CPO involves demolishing a principle private residence and reduces accessibility to their business both during and after construction.
- Concern of impact upon future redevelopment potential of their property, which is zoned Z3, Neighbourhood zoned lands.
- The bridge widening works to facilitate new pedestrian and cycling structures require the removal of a gated access and separate roadway leading to their business.
- Concern of construction works impact on business.
- Concern of loss of on-street car parking spaces.
- Concern that future access requirements from Upper Clanbrassil Street and impact upon Z3 zoned lands has been appropriately considered.

- Request that ABP request additional information on the alternatives to the proposed bridge widening and new junction creation on Clanbrassil Street.

### **32. Harolds Cross Tidy Towns Committee c/o Kieran Mullarkey, 5 Tivoli Avenue.**

- Welcome the aims and objectives of the Busconnects CBC
- Concern public realm is fully considered.
- Welcome public realm improvements at the junction of Sundrive Road with Lower Kimmage Road
- Welcome public realm improvements at the junction of Ravensdale Park with Lower Kimmage Road.
- Request / suggest that cross community benefit be engage with to provide public seating and enhanced planting at Harolds Cross Bridge area – Robert Emmet Bridge – Grand Canal.
- Request the existing footpath to south side of Harolds Cross Park opposite 174 and 194 Harolds Cross Road, at the exit, should be retained and enhanced.
- Concern of loss of trees on east side of Harolds Cross Road, request that street tree planting is augmented rather than diminished.

### **33. Hugh Kearns, 25 Moeran Road**

- Submit that the hours & days of operation of the Bus Gate should be reconsidered, 7 days a week would be problematic.
- Hours of operation should align with actual peak traffic.
- Concern of loss of car parking on Kimmage Road Lower.
- Submit that the 52 parking spaces from no.'s 177 – 199 Kimmage Road Lower are privately owned, there has been no engagement with NTA regarding these spaces.
- Concern of lack of comparative analysis of adjacent bus corridors.
- Concern of cycle route away from Kimmage Road Lower, through Ravensdale Park through Mount Argus estate, impactable, cyclists will not divert to a longer, slower winding route.

### **34. Hugh Raferty 79 Corrib Road.**

- Support for the project
- Half measures will limit the potential for success.
- Significant environmental benefits, cleaner air, reduced greenhouse emissions, reduced emissions, reduced congestion, improved physical health, improved mental health

- Wider benefits, i.e. expanded, more consistent, safe, improved, public transport network,
- Improved tourism potential, attractive and easy to navigate the city.
- Consequences of not implementing the project, public transport falls short, cycling environment hostile, decline in physical and mental health, restricted economic development, restricted foreign direct investment.

**35. Irene and Eoin Lewis, 20 Corrib Road**

- Desirable to have a bus corridor.
- Concern of blocking off of Derravaragh Road and Corrib Road.
- Concern of set of bollards at junction of Derravaragh and Corrib Roads which will block easy access to shops.
- Concern of increased congestion.
- Concern of fire and emergency access / egress
- Proposed bollards will cause traffic bottleneck and congestion.
- Concern of traffic congestion on Kimmage Road.
- Concern bollards are unnecessary and will add significantly to journey times.

**36. Isabella Walsh, 6 Mount Argus Way**

- Concern with regard to the proposed cycle path at Mount Argus.
- Concern of impact of boardwalk on biodiversity and cultural heritage, impact upon Stoneboat and conservation of Poddle River.
- Concern of impact of the proposed cycle path along the River Poddle and Mount Argus from a security perspective, safety and family needs.
- Concern of safety of children who are using the park from cyclists speeding through.
- Concern of cycle path alignment and dangerous bends.
- Raises the same points as raised within the submission from Eoin Duggan, submission summarised at No. 26 above.

**37. Ivana Bacik**

- Support for the scheme, which represents a key step towards improving public transport and cycling infrastructure along this busy route.
- Supportive of plans for improved bus services, the increased provision of safe cycle lanes and active travel infrastructure.

- It is of great benefit generally to see plans for the development of a cleaner, quieter, more sustainable environment for everyone living and working in the area covered by this scheme.
- Support Increased frequency of buses, and reduced journey times on public transport.
- Supportive of the new pedestrian & cycle bridges on Emmet Bridge and the building of a new wall on the bridge.
- Plans to enhance safety at KCR are welcome.
- Concern public realm improvements have been reconsidered in favour of retaining car parking spaces in front of businesses, on lower Kimmage Road.
- Welcome the peak hour bus gates from Kimmage Cross Road to Harolds Cross.
- Concern with respect to the proposed Poddle Cycleway which now ends by joining Mount Argus View and exiting onto Lower Kimmage Road
- Note the comments of Dublin Cycling Campaign in respect to intermittent cycle lanes along Kimmage Road Lower.
- Concern with respect to width of cycle lanes, less than 2m
- Support the concern of St. Louis High School in Rathmines, with respect to route changes and loss of service.
- Concern of impact of construction on local communities, communication and liaison with DCC and local residents during the construction period.
- Concern for protection of biodiversity.
- Express concern about the level of fee required to make a submission on this consultation process.

### **38. James Purcell**

- Concern of impact of Bus Gates to residents of Kimmage Road Lower
- There is a need for residents to be allowed access through the Bus Gate, technology exists to afford this.
- Concern of raised pavement treatment plans and impact upon the laneway access to properties 128a, 128b, 128c, and 128e Lower Kimmage Road.
- Concern impact of cycle path on deliveries, waste collection and bins.
- Request that road markings and traffic signage for unencumbered access and egress to the lane between 128C and 130 Kimmage Road Lower are provided.
- Bus stop shelter at bus stop 2391, Priory Road is impractical due to narrow width of footpath.
- 30Kph speed limit on Kimmage Road Lower is not realistic or fuel efficient.

### **39. Jeff Kelly**

- Concern to the opening up of the Mount Argus Estate onto Sundrive Road for the proposed cycleway.
- Safety concerns for children, no segregation from the proposed cycle path and Mount Argus Square Apartments.
- Concern for safety of young and old from cyclists not stopping at lights and speeding.
- Query the need for the cycle path given the bus gate.
- Concern of anti-social behaviour in Mount Argus Park from opening up access and proposal for cycle path connectivity.
- Concern of impact to biodiversity of Mount Argus Park and River Poddle.
- Concern of restrictions and bus priority at KCR
- Concern of loss of bus stops.
- Concern of loss of access to amenities, services and shops, esp. by elderly and not abled bodied.
- Concern of bus gates on Lower Kimmage Road
- Concern of impact upon archaeology and cultural heritage of the city.
- Query the need and necessity of the project in light of Covid and working from home.
- Concern cycle lanes are not wide enough and unsafe.

### **40. Jim O'Brien, 52E Mount Argus Road**

- Concern public realm improvements have been watered down or abandoned.
- Concern of removal of public footpath along the southern edge of Harolds Cross Park.
- Concern of impact on trees within Harolds Cross park.
- Concern of impact to school children walking to school, crossing roads, unsafe.
- Concern proposal will hinder attempts to increase walking & cycling to schools.
- Concern the proposal prioritises cars and traffic flow over pedestrians and is contrary to stated objectives and aims of the scheme and national guidelines.
- Proposal to remove the footpath is contrary to DMURS
- Concern of removal of the cycle lane on the east side of Lower Kimmage Road.
- Concern of changes to Poddle Cycleway pushing cycling traffic onto the main road earlier.
- Request that the quiet street treatment for Mount Argus Road should be reinstated.

#### **41. Kenilworth Park Residents' Association**

- Welcomes the principle aims and objectives of the project.
- Welcomes the reduction in traffic volumes, greater utilisation of public transport and a reduction in private traffic volumes in the locality.
- Concern of removal of proposal for No Left Turn from Sundrive Road to Lower Kimmage Road. This will have a fundamental knock on effect to the number of vehicles using LKR and to prevent through traffic from using Kenilworth Park instead of Clareville Road.
- No reason given for deviation / change from initial proposals namely EPR, PC2 and PC3 which provided for No Left Turn Except Buses Taxis and Bicycles.
- Concern of changes to the direction and length of the segregated cycle track 'The Poddle Cycleway'.
- Welcome the public realm improvements at junction of Sundrive Road with Lower Kimmage Road.
- Welcome the public realm improvements at junction of Ravensdale Park with Lower Kimmage Road.
- Concern for proposals to the historic Robert Emmet Bridge, unnecessary and will cause undue structural damage, priority signalling could be used instead.
- Enforcement will be necessary and vital to ensure the scheme is effective and workable.

#### **42. Larkview FC c/o Mark Caslin**

- Concern of the Bus Gate at the junction of Kimmage Road Lower and Ravensdale Road with no left turn between the hours of 6pm and 8pm.
- Concern of impact upon juvenile teams and access to the club.
- Concern one will not be able to access the club from the Harolds Cross side either via private transport.
- While the idea that more people could bus, cycle and walk it is not workable for everyone.
  - 70 coaches involved with the juvenile section of the club, it is not possible to carry equipment on a public bus or bicycle.
  - Cycling in the city is dangerous for small children and not recommended
  - Family commitments, dropping off and picking up multiple children will be hampered and unviable for families.
  - Not everyone lives on a busroute
- Concerned impact upon club will not be sustainable
- Request that the Bus Gate be relocated north of the club.

- Request technology is used to allow cars limited access.
- Concern cost to local community is too high to facilitate commuters
- Concern that without mitigation this proposal will diminish life for local citizens, which would be contrary to the DCC Development Plan Objectives.
- Concern survey data is out of date, given shift to working from home and cultural shift post covid.

#### **43. Larkfield Residents Association**

- Support and welcome the development of the bus network.
- Concern of indirect impact of diverted traffic to Larkfield Park.
- Concern of serious detrimental effect on the Larkfield Avenue / Larkfield Park / Clareville Road area.
- Concern of rat running, esp. impact upon local schools.
- Concern of safety from additional traffic and speed, the area has a significant population of elderly and young children.
- Concern of prioritising through traffic along a settled residential road.

#### **44. Legal Estate of Residents of Agnes Cassidy c/o Rodney Cassidy**

- Concern to property located at 31 Clanbrassil Street.
- **Request that an OH be held**

#### **45. Liam Smyth, Kimmage Grove**

- In agreement with the proposal subject to observations.
- Need to relocate existing telephone / light / sign poles which are poorly located and block pedestrian path. Suggest that a survey is carried out.
- More new trees should be planted to increase tree provision in the city.
- There is an opportunity to provide high quality amenity space to Sundrive Road / Lower Kimmage Road junction and surround.
- High quality palette of paving should be used.
- A more ambitious planting / landscaping / street furniture plan is required.

#### **46. Linda Patton, 6 Rathdown Court**

- Opposed to the project.
- Concern of cumulative impact of the project with adjoining Templeogue / Rathfarnham Bus connects and Tallaght / Clondalkin to city centre Bus connects projects.

- Concern of negative impact to urban villages, local businesses and communities.
- Concern of impact of Bus Gates on local residents.
- No evidence restrictions are needed at weekends.
- Concern of clarity of maps.
- Concern of circuitous routes for car journeys which can not be done by public transport.
- Concern that public consultation process meets Aarhus Convention obligations.
- Concern all 12 Bus Connects routes have been considered separately.
- Concern of project splitting and in-combination effects not assessed in the EIA.
- Concern up to date traffic modelling and counts have not been used.
- Cumulative impact upon nature conservation is required, in particular Bat population.
- **Request that an OH is held.**

**47. Lisa Harrington, 37 HCR, Dublin 6W**

- Concern that front boundary (iron railing and low stone wall) will be reinstated to a condition comparable to existing if not improved.
- Concern of impact upon 3 mature apple trees in the front garden, 2 of which are located in an area to be temporarily acquired.
- Concern of impact upon mature privet hedge.
- Impact upon a retaining wall to support the lawn area in the front garden.
- Concern rose bushes, concrete path and steps leading to the front door will not be damaged.
- Seek confirmation that drainage will be adequate.
- Request consultation on design.

**48. Lower Kimmage Road Residents Association (LOKRA)**

- Broad support for the proposal.
- Accept altered access and egress arrangements with on-going monitoring of impacts and potential for a vastly improved bus service, without road widening.
- Submit neighbours on adjoining roads will share proportions of redistributed traffic which residents on Kimmage Road Lower have borne for decades and which in current volumes and speeds is no longer sustainable.
- Submit cautious support and welcome benefits of a cleaner, quieter, safer road and living environment.



- Request that consideration be given to the operation times of the Bus Gates to include school pick up times.
- Support 30Kph speed limit on KRL
- Requests the reinstatement of the No left turn at Sundrive Cross onto KRL from Sundrive Road.
- Welcomes the upgrades for bus stops but queries practicality of providing shelter and seating at all bus stops. Concern expressed with regard to bus stops 2440 (Aideen Ave), 2391 (Priory Road) and 2390 (Kenilworth Park) on narrow sections of path.
- Welcomes improvement to junctions
- Welcome 2 m wide footpath commitment.
- Concern of reduced footpath at the southern end of Harolds Cross Park.
- Welcomes enhanced cycling provision.
- Supports the reduction in speed limits.
- Strongly supports improvements to public realm.
- Concern public realm at Sundrive Road crossroads at KRL, noted as the 'village centre' is not enhanced in the scheme/
- Concern parking spaces are favoured over pedestrians and cyclists at 169 – 199 LKR to facilitate businesses. Contrary to policy.
- Concern removal of trees to provide car parking is unacceptable.
- EV Charging infrastructure should be provided.
- Evaluation of utilities and wiring should be carried out to improve visual impact.
- Concern of land take from homes, particularly gardens of 33 to 61 and St. Clare's School and the CPO of a private dwelling at Fottrell House offices at Emmett Bridge.
- Residents whose homes are directly beside bus gates should be provided with alternative and appropriate parking spaces.
- Concern for loss of car parking for residents on KRL / Sundrive Road Junction
- Contest the assertion that most residential properties have off-street parking at the rear.
- Concern for proposals to Robet Emmet Bridge and advocate for a different approach.
- Concern for protection of Harolds Cross Park and Mount Jerome cluster of protected structures.
- Concern for direct impact on architectural heritage of KRL
- Consider Park & Ride is critical for success of the project.
- Submit enforcement and signage is critical to success of the project.

- Monitoring and on-going community engagement is required.
- Errors in the documentation with respect to right of way notices, discrepancies in the indicated bus gate timings, quantity of resident car parking spaces, there is no existing bus shelter at stop 2440
- Signed petition attached.

#### **49. Margaret McEntegart 128a KRL**

- Similar submission to James Purcell, summarised at submission No. 38 above.
- Concern of impact of Bus Gates to residents of Kimmage Road Lower
- There is a need for residents to be allowed access through the Bus Gate, technology exists to afford this.
- Concern of raised pavement treatment plans and impact upon the laneway access to properties 128a, 128b, 128c, and 128e Lower Kimmage Road.
- The raised pavement and cycle path to the front of No. 128a will prevent deliveries by service vehicles, impact waste collection and bins and emergency access.
- As a wheelchair user the observer is not permitted by DCC to have a disabled parking spaces outside as she has access to rear parking space.
- Concern of impact upon property value.
- Request that unencumbered access and egress is maintained to the lane between 128c and 130 LKR, by way of road markings and traffic signage.
- Bus stop shelter at bus stop 2391, Priory Road, is impractical due to narrow width of footpath.
- 30Kph speed limit on Kimmage Road Lower is not realistic or fuel efficient.

#### **50. Martin Kelly**

- Concern with respect to Apartment 44 Greenville Place, Clanbrassil Street.
- Concern with respect to construction compound K3 located directly outside bedroom windows.
- Concern of tree planting proposed.
- Concern of negative impact to amenity of property and hence property value.

#### **51. Senator Mary Seery Kearney**

- Flawed initial premises.
- Concern of proportionality, cost, CPO, build cost, consultancy, design, legal fees.
- Key measures are efficiency, safety, integration, sustainability.
- Concern that the cost and reduction in quality of life and environmental impact far outweighs any theorised improvements.

- Concern of traffic dispersion, increased volume of traffic and congestion to surrounding residential roads.
- Concern of environmental pollution from congestion.
- Concern cumulative impact of all the bus corridors has not been carried out.
- Concern of reduced access to traditional thoroughfare roads.
- Concerns for pedestrians regarding the diminution in safety at evening and night time brought by the introduction of LED lighting.
- Welcomes the delivery of cycling infrastructure.
- Concern segregated cycling tracks are not continuous along the CBC routes.
- Concern that a minimum of 2 meters cycle track width is not reached throughout whole sections of the proposed cycle tracks.
- Concern of road sharing between cyclists and pedestrians at Poddle Park
- Support the concern of residents of Mount Argus Close / Court and View with respect to new quiet cycle route and opening up access to their area, adding significant cyclists numbers and concerns of safety and security, personal injury.
- Concern alternatives such as congestion charges, subsidised or free bus services and a proper on street or underground metro system has not been considered.
- It is not just residents in these suburbs who use public transport, people coming to Dublin for matches, music gigs, hospital appointments and a plethora of other reasons also come to Dublin and a significant portion come by car.
- Concern for access arrangements for residents of Gandon Close, St. Clare's Road and Mount Jerome, they will have to double back on themselves to travel towards town.
- Concern of longer and more circuitous routes for local residents accessing local hospitals, shops, services and amenities.
- Concern of flawed public consultation. The NTA has left themselves wide open to a challenge under the Aarhus Convention for a failure to properly engage in public consultation.
- Concern bus drivers were not consulted with.
- ABP should have published criteria and methodology for how it intends to deal with assessment, rationale for acceptance or refusal of Busconnects.
- Concern of amendments to turns and road markings along the route.
- **Request that an OH be held.**
- Concern of removal of bus stops, esp. for elderly and disability access.
- Concern of impact upon parks, sports facilities and playgrounds
- Concern reasonable alternatives, i.e. metro, have not been properly considered.

- The businesses in Kimmage and Sundrive Road will be disproportionately impacted.
- Concern for traders on Clanbrassil Street with respect to loading and unloading.
- Concern time saving purported does not outweigh the impact to local residents.
- Concern of negative impact to cultural and historical heritage, in particular the Stoneboat and its surrounding ecosystem.
- Concern the change in DCC City Development Plan during the design process has not been fully regarded.
- Concern of impacts on Heritage and the Environment.
- Concern of proposal to place bollards at Derravaragh / Corrib Road.
- Bollards at Aideen Road should be removed to facilitate local access and given they will no longer be required.
- Submission includes transcripts of emails, calls and texts
- Many microscopic and larger changes are required to meet the needs of local residents.
- A broad acceptance without detailed explanations of your reasoning for acceptance or rejection of the entirety or the individual elements of the scheme will not be acceptable.
- Concern that there are conflicts in base plans and contradictions across plans supplied for those affected by CPOs.

## **52. Melanie Pine and Others, 50, 51 & 52 Clanbrassil Street**

- Concern with respect to loss of car parking on Clanbrassil Street Upper
- Proposal to reduce paid parking from 11 no. spaces to 6 no. spaces, all located on the western side of the street, with no parking at any other time, will be detrimental to business and lives of residents.
- Concern of impact upon deliveries, tradesmen parking.
- Concern of impact upon elderly residents, one of which is 73 years of age.
- Making life difficult for existing residents and businesses is contrary to principles of good urban planning.
- Object to reduction of paid parking on the west side of the street
- Object to the elimination of paid parking on the east side of the street.
- Object to elimination of parking between 10am and 12 noon, between 7pm and 7 am and on Sundays.

### **53. Metro South West Group**

- 30 pages submission in favour of Metro as a better alternative to BusConnects in this part of the city.
- Not specific to Kimmage to City Centre Busconnects scheme, broad analysis in favour of Metro.
- Submits that the proposed bus corridors will have insufficient capacity to cater for the forecast demand for public transport in Southwest Dublin.
- Submits Busconnects proposals are not aligned with the Draft Dublin City Centre Transport Plan in that many people, who wish to use public transport to access the city centre will not be able to do so as the Busconnects offerings will be insufficient to accommodate them.
- Concern narrow streets in Southwest Dublin a solution which is not exclusively street based is required to facilitate modal shift.
- Requests that ABP to allow Metrolink to come no further south than St. Stephen's Green – so as to preserve the possibility of continuing from St. Stephens Green to Portobello / Rathmines.
- Accompanied with appendices of list of residents associations and groups participating in MSWG and questions on the number of buses required to pass through Dawson Street in peak period currently and in 2028 and 2048.

### **54. Michael McMahon and Nathalie Peret 47 Rathgar Avenue.**

- Concern Bus Gate at Kenilworth Square North will divert westbound traffic onto Rathgar Avenue.
- EIAR Chapter 6 does not provide detailed traffic analysis of the impact.
- Concern of gully's and drainage problems at the junction to HCR.
- Concern of potential Noise and Vibration impacts assessed at 5m from the road edge does not address houses closer than that (3.5m).
- Air Quality impact has not been assessed for Rathgar Avenue with displaced traffic.
- Concern proposal will make it difficult to access driveway at property with increased traffic.

### **55. Michael O' Donoghue, 128 Kimmage Road Lower**

- Similar submission to James Purcell, summarised at submission No. 38 above.
- Concern of raised pavement treatment plans and impact upon the laneway access to properties 126 – 136 Lower Kimmage Road.

#### **56. Mount Argus and Church Park Residents**

- Concern of proposed 'stoneboat' cycle route from Sundrive Road through Mount Argus Estate.
- Concern for heritage of Stoneboat built in 1245 AD Loss of cultural heritage, impact of boardwalk upon stone boat feature
- Question necessity of the new proposed cycle path. Alternative cycle route through Eamonn Ceant Park.
- Lack of consideration of past experience with respect to security issues, and community spirit and safety,
- Concern of increase in anti-social behaviour.
- Concern of conflict between cyclists and pedestrians.
- Lack of consultation and evidence showing where cycle paths in enclosed estates work for the community
- Loss of biodiversity

#### **57. Mount Drummond District Residents Association**

- Serious concern of rat-running, traffic from Harold's Cross Road through to O'Hara Avenue and illegal right-turn onto Grove Road to avoid right-turn ban at Robert Emmet Bridge.
- Concern of eastbound rat-run from Parnell Road turning right to go south in absence of filter at main junction.
- Need to retain and expand the Yellow box at Armstrong Street junction.
- Concern traffic impact modelling is adequate and robust.
- Monitoring of traffic impact before and after implementation of the proposed restriction on the right hand turn at Harolds Cross Bridge from HCR to Grove Road is required.
- Constant monitoring is required.

#### **58. Orwell Park (Templeogue) Residents Association**

- Concern information is deficient with respect to number of buses forecast in the peak hour on the corridor, how buses will be able to proceed through the city centre, how F1, 81 and 82 bus services will operate when the spawell roundabout is converted to a signal controlled junction.
- Concern of uncertainty and limited benefits (time saving)
- Concern of CBA
- Concern of severe disruption for cars

- Recommend that if approved that conditions are applied to impose fareless journeys, limit construction and expenditure, reduce bans on right hand turns, further investigation of Metrolink from Stephens Green to SW Dublin.
- Bus Gates in Kimmage will increase traffic on Wellington Lane, Templeogue, which will impact the cycle route towards Kimmage.
- Severely restricted access by car from Templeogue to City Centre.
- Attached the Metro South West Group submission.

#### **59. Our Lady's Hospice & Care Services**

- Concern with respect to Plot Ref. 1019(1).1a, 1019(2).1f, 1019(3).2a, 1019(4).2f in the ownership of Our Lady's Hospice and Care Services.
- The NTA has proposed the site / land as a 'car park' and it is to be used as construction compound K2 for a period of 15 months.
- Concern of impact on the hospice's proposal to expand the facility.
- Submit that the location of the proposed car park is the last remaining piece of land / site for expansion of the hospice.
- Lands to the rear of the hospice are in separate ownership and not available as an alternative site for expansion.
- Concern proposal for a car park at this location is contrary to local and national planning policy.
- Concern of impact of construction compound upon only access to the hospice due to location of K2.
- Car park at this location is contrary to all local and national policy, which seeks to encourage sustainable methods of transport use.
- Concern EIAR is deficient in its assessment. Inadequate assessment of impacts: access restriction beside construction compound, noise, and dust. Human Health & Population – risk of traffic delays for access to hospice.
- Concern that the '4-part Proportionality Test' has not been met.

#### **60. Paddy Glynn, 56 Lower Kimmage Road**

- Support the views of LORCA
- Concern of narrow roads and fit for Busconnects
- Lack of trust to NTA proposals.
- Broadly supportive of the proposed scheme.
- Concern transparent monitoring of impacts will be carried out.
- Cumulative traffic data modelling must be made available.

- Request to reinstate the weekday 7-10am left-turn ban at Sundrive Cross towards the north.
- Need to develop school zone traffic management at Clareville Road.
- Implement lower speed limits sooner.
- Requirement for more pedestrian crossings on Kimmage Road Lower.
- Requirement for better quality surfacing for cyclists on Kimmage Road Lower.
- Remove bus gate at northern end of Harold's Cross Park.
- Concern to removal of footpath at southern end of Harold's Cross Park.
- Concern to road widening with CPO on Harold's Cross Road and Clanbrassil Street Upper.
- Concern with proposals at Robert Emmet Bridge.
- Technology exists for 'White listing' for local traffic through bus gates.
- Request that E-charging points are explored.
- Park & Ride at city boundaries should be considered.
- Limited proposals for landscaping and biodiversity are welcome but should be more extensive.

**61. Paul Cashman, 25 Airfield Road, Rathgar**

- Concern with regard to Plot List 1002(1).1g, 1002(2).2a, 1002(3).2g,
- Concern of impact upon Mount Argus Square apartments.
- Concern of impact upon bin storage and security.
- Concern of impact of cycleway upon biodiversity of the Poddle.
- Concern of safety and necessity of the cycleway.
- Concern of the proposal to remove access to five points crossroads from Kenilworth Sq. negative impact to surrounding roads and no joined up thinking on roads with DCC.

**62. Paul Ryan and Others, 19 Greenmount House, Greenmount Office Park, HC**

- Premise of scheme is flawed, and Metro is preferred.
- Proposals will increase traffic and journey times.
- Every journey is not into the city centre.
- Refers to numerous traffic restrictions across 3 CBC schemes and the implications for traffic in places such as Rathmines, Rathgar, Ranelagh, Terenure, Crumlin.
- Segregated cycle lanes not continuous along CBC.
- Concern to 24/7 bus gates.
- Flawed public consultation during COVID.



- Concern of disproportionate impacts for many businesses, including difficult delivery routes.
- The schools in the area are all on roads which will have increased traffic volumes.
- Concern for elderly, visually impaired, mobility challenged, child safety.
- Concern of negative impacts to local residents, businesses and community.

#### **63. Peter Drennan 73 Poddle Park.**

- Concern of Bus Gate and closure of Poddle Park to through traffic.
- Concern of traffic diversion onto residential streets and past schools.
- Concern of longer routes for residents via Stannaway Road.
- Concern of delay for emergency vehicles.
- Failed Consultation procedure. Residents of Poddle Park did not receive a letter as "impacted properties"

#### **64. Recorder Residents Association**

- Concern the consultation process was not inclusive of all residents, fundamentally flawed.
- Concern that route options 'A', 'F' and 'D' will negatively impact upon neighbourhoods and daily lives.
- Concern cumulative impact has not been adequately assessed of route options 'A', 'F' and 'D'.
- Concern of cross city bus route, continuation of buses to the north side of the city, solution is not part of the project.
- Concern of the function of the core corridor.
- Concern of:
  - Closure of the LKR from 7.00 am – 10.00 am x 365 days to general traffic from Ravensdale to Harolds Cross
  - Evening traffic will be impacted 4pm – 8 pm
  - The removal of 3 slip roads at KCR
  - Closure of section of Kenilworth Road to general traffic
- Concern of cross city and orbital journeys.
- Concern of justification of the project in terms of cost and time saving achieved.
- Concern of number of buses on each corridor, capacity issues and frequency.
- Consideration of underground option should be explored.
- Concern Metro option ignored.
- Concern that park and ride facilities are not incorporated.

- Concern of failure to consider alternative options.
- Concern traffic modelling is deficient and cannot be relied upon.
- Concern of loss of 300 year old mature trees.
- Concern of impact on Terenure Road East and destruction of character of Terenure Village.
- Concern of imbalance in relation to common good.
- Concern of distance between bus stops. No outbound bus stop at the garda station in Rathmines.
- Concern carbon emission will be increased.
- Request that a feasibility study on the south west area be carried out and evaluated.
- There is a need for more introduction of local link routes, cashless payments, dedicated school buses, monitoring of bus priority.
- Suggest evening Busgate closure on lower Kimmage Road should be shortened to 4 pm to 7 pm to facilitate businesses and nighttime economy and taxis.
- Concerns raised by Cheeverstown House, represented by Cheeverstown House Employment Support Services on 198 Whitehall Road, of impact to people with intellectual disabilities living in south west Dublin.
- Concern pedestrians are required to cross over cycle lanes to get on and off a bus.
- Concern of the changes to bus routes and loss of direct bus routes for people with disabilities.
- Combined impact of 3 CBC schemes.
- Rail alternative to other CBCs in Dublin.
- Metro needed instead / as well.
- Poor public awareness of BusConnects and CBC schemes.
- Traffic restrictions on two main routes to city: Kimmage and Terenure.
- Traffic restrictions proposed at 36 different locations across the 3 schemes will cause extensive displacements, disruption, and delays.
- Car trips will only decline by 1.5% and some local journey times will more than double in distance and time. Implications for Climate Action Plan commitments due to increased fuel consumption.
- Very small increases in proposed bus services.
- Many local businesses across the Dublin 6W and Dublin 12 areas need vehicle access routes.
- Road space is not fairly allocated by mode share.
- Increased carbon emissions due to BusConnects.
- Corridors are considered in isolation.

- Provide local school bus services.
- Open southern bus gate to traffic at 7pm rather than 8pm

#### **65. Religious Sisters of Charity (RSC) Entrance to our Lady's Hospital**

- Concern with regard to Plot List 1019(1).1a, 1019(2).1f, 1019(3).2a, 1019(4).2f
- Sister Theresa Kennedy and Sister Una O'Neill are incorrectly stated on the CPO Schedule as being 'Owners or Reputed Owners'.
- The RSC has property within Our Lady's Hospice campus, the congregation shares the use of the campus avenue with Our Lady's Hospice and Focus Housing Association
- Concern of impact upon access, uninterrupted passage for access utilities, services etc
- Concern of proposal for a 22 space public car park.
- Lack of information on new entrance gates and management of same, maintenance, repair, control of acquired avenue and management, operation, control of the car parking spaces.
- Concern of traffic and access disruption and health and safety risks.
- Concern that Proportionality Test has not been met.
- Disproportionate interference with property rights.
- If ABP decides to approve the subject scheme they should do so with 'modifications' removing the proposed acquisition of Plot List 1019(1).1a, 1019(2).1f, 1019(3).2a, 1019(4).2f

#### **66. Ruth Glennon & Others, Harolds Cross Educate Together N.S 151 / 153 HCR**

- Concern there is no provision in BusConnects scheme for "School Zone" with 30 km/h speed limit along HCR.
- Concern school has been requesting signage since it opened in 2019 and this has not been granted.
- Concern no signage or traffic calming measures included in the proposal to indicate the location of the school.
- Concern of children crossing on HCR
- Concern cyclists disregard pedestrian lights and travel at speed along this stretch of road.
- Welcome much need improvement to public realm
- Concern cycle paths are less than advisory 2m
- Concern of cyclist collision and safe access for cyclists to the school.
- Concern of reduction of footpath on southern end of Harolds Cross Park.

- Concern that the proposed Bus gate from Kimmage Road Lower at the junction with Sundrive Road outlines a left-turn ban from Sundrive Road onto Kimmage Road Lower for general traffic and will give rise to rat-running.
- Concern of safety of crossing point at Clareville Road and Kenilworth Park, need for safe pedestrian crossing.
- Compliance with DMURS is required.

**67. Saint Martins Residents Association c/o Karen Talbot 13 St. Martin's Park**

- Reduced hours for southern Bus Gate No.1 welcomed but not necessary at weekends. No impact assessment for the residents.
- Bus Gate No.2 at McGowan's should operate at same peak hours as Bus Gate No.1.
- Bus Gate No.3 at northern end of Harold's Cross Park: southbound operational times unclear.
- All bus gates should operate only at peak hours 5 days a week.
- Concern that advisory cycle lanes been removed south of Sundrive Cross in favour of parking.
- Proposal to reduce road width to accommodate car parking spaces is unsafe and unsustainable.
- Concern there is no assessment in the EIAR on removal of the advisory lanes.
- Contradiction between text and drawings. Concern there is too much parking generally.
- Concern cumulative impact of all busconnects schemes in tandem has not been considered.
- Additional pedestrian crossings requested on Kimmage Road Lower, outside Tesco.

**68. Sharon Sabin & Bruno Rodrigues de Oliveira, 1 Mount Argus Court**

- Objection to the proposed cycle route and Stone Boat Boardwalk, similar to other residents in the estate. Little benefit for cyclists.
- Questionable necessity, it is not an improvement and makes no sense.
- Safety on local streets shared with traffic.
- Anti-social behaviour and security risk to Mount Argus estate, concern of proposal to provide access to Mount Argus Way from Sundrive Road, with removal of a wall.
- Biodiversity along River Poddle.

**69. Simeon Rimmer & Sheila Hourigan, 4 Greenmount Avenue, HC**

- Proposed Scheme will increase incentive for drivers to short cut through the narrow streets west of Harold's Cross Road to circumvent the proposed right-turn ban into Grove Road creating a rat-run.
- Concern of reduced residential amenity, safety issues esp. to pedestrians and cyclists.
- Request mitigation of the impact on traffic on Greenmount Avenue and Greenmount Lane.

**70. Siobhán McClean, 282 KRL**

- Supports Proposed Scheme in general, in particular the bus gates, junction improvements, public realm, cycling facilities in Harold's Cross and Clanbrassil Street.
- Concerned about low-quality cycling facilities on Kimmage Road Lower.
- Concern advisory cycle lane removed and replaced with car parking spaces.
- Concern off street car parking required for affected residents
- Need for traffic calming to complement 30 km/h speed limit and enforcement cameras.
- Bus Gate should operate 24/7, or at least be extended to cover school closure times in the afternoons.
- Studies have shown that a reduction in through traffic helps businesses.

**71. South Dublin Electrical Wholesale Ltd, 84 Lower Clanbrassil Street**

- Concern of impact of construction compound and storage unit in the immediate vicinity of their business.
- Concern of impact upon access to business.
- Construction compound should be relocated – moved to St. Vincent Street Flats public car park.

**72. St. Anne's Residents' Association**

- Concern traffic restrictions in the Proposed Scheme, and in combination with other CBC schemes will have a negative impact for residents of this estate.
- Concern of loss of access to services, amenities and local facilities.
- Concern for elderly and sick people to access services.
- Concern congestion will give rise to carbon emissions
- Supportive of the scheme objectives

- Traffic restrictions in the KCR area should be refused, bus lanes and priority traffic signalling would suffice.

### **73. Stannaway Road Residents**

- Supportive of BusConnects Scheme,
- Concerned about impacts of displaced traffic to surrounding residential area.
- Concern in reduction of 50% in bus frequency when No.83 route replaced.
- Concern of non-compliance with existing HGV ban on Stannaway Road.
- Concern no measures in the Proposed Scheme to mitigate traffic impacts on Stannaway Road.
- Concern that Appendix A6.1 -TIA-Appendix 1 - Transport Modelling Report, Table 5.2 JTC Locations, 11-5 Kimmage Road Lower/Ravensdale Park has 28,364 daily vehicle movements. Therefore, there is a significant chance that up to 10.3 million additional vehicles per year could naturally redirect onto the narrow residential roads of Stannaway Road, Cashel Road and Captains Road.
- Scheme includes traffic management proposals east of Kimmage Road Lower (3 of the 4 mentioned are existing), but only 1 restriction to the west at Poddle Park.
- Poddle Park cycle route duplicates the cycle lanes on Kimmage Road Lower and should remain open as a traffic route alternative to Stannaway Road.
- Ferns Road already restricted between 7-10am, but not observed or enforced.
- Speeding on 1.5km of Stannaway Road as it's a long straight road. Full ramps requested.
- No mitigation for noise and vibration on Stannaway Road. Air quality concerns.
- Delays for proposed new No.82 bus on Stannaway Road.
- More pedestrian crossings requested on Stannaway Road.
- Enforcement of existing traffic restrictions.
- Residents of Stannaway Road were excluded from Consultation process on the basis that mitigation was not required on the road.
- Concern traffic will bring noise, vibrations, blocked entrances, rat running, speeding, pollution, reduced safety for children and the vulnerable, removal of safe streets and increased stress.
- Concern of loss of local businesses.
- Concern that no traffic calming is proposed on Stannaway Road.
- Accompanied with appendices of list of names and email communication with NTA

### **74. Terenure/Templeogue Sustainable Community**

- Unhappy with consultation process during COVID.

- Objection to 3 bus gates, which will displace traffic onto other roads south of KCR.
- Only Bus gate which should be allowed is the one closest to Mount Jerome Cemetery.
- Bus Gate at Ravensdale will give rise to increased traffic and congestion on Fortfield Road, TRW and Wainsfort Road.
- Concern of congestion and diverted traffic in particular HGV's
- Cycle lanes welcomed.
- Right-turn lanes should be retained at Grand Canal and South Circular Road.
- Combined impacts of 3 adjoining CBCs need to be considered. In combination effects.
- Accompanied with petition of signatures.

#### **75. Terenure West Residents Association**

- Highlight that the €100 to comment on 2 CBC schemes in the same area is unfair.
- Welcome the scheme overall, agree car use needs to be reduced.
- Concern of increased traffic volume on local roads, particularly Fortfield Road, Greenlea Road and TRW
- Concern of loss of access to Kimmage Village and northbound from TRW
- Concern the negatives outweigh the benefits to local residents.
- Concern the proposal is environmentally damaging.
- Inadequate consultation process.

#### **76. – Tesco Ireland Ltd.**

- Request for loading bay at premises on Kimmage Road Lower at junction with Corrib Road.
- Unclear if existing loading bay is to be retained outside the Tesco store
- The introduction of bus gates means that the current approach for deliveries to Tesco Kimmage Express store is no longer possible.
- To avoid unsuitable access requirements (U-turns and access via narrow residential streets) it is requested that a suitable delivery window in bus gates operational hours is considered or permitting HGV's pass through Bus Gates.
- Acknowledge and welcome the need to improve the accessibility of our city.
- Ask that the importance of servicing and accessibility be recognised.

#### **77. The Estate of Joy Ordman, Deceased c/o Shoshana Khan & Semone Eppel**

- Concern with regard to Plot List 1001(1).1a, Easement Plot List: CA
- The estate concerns 11 – 13 Sundrive Road

- Concern of creation of the 2-way Dodder Cycleway adjoining the doorway to No. 11, it limits access for deliveries and impact emergency access use of the door.
- The Dodder Cycleway will impact upon maintenance and repair access of 11 – 13 Sundrive Road.
- Concern of impact upon future development potential of the building.
- Concern of legal rights over the cycleway to access 11 – 13 Sundrive road – legal and title information in respect of reduced and narrowed access.
- Concern of proposal to located a construction compound at K1
- Concern of loss of car parking spaces for residents of 11 – 13 Sundrive Road, negative impact upon tenant deliveries and collections for retailing and business.

#### **78. – Mount Jerome Cemetery and Crematorium**

- Combined impacts of 20 bus gates along 5 bus corridors in the southwest sector restricting access routes to the cemetery. 4 of these bus gates are in the Kimmage CBC scheme.
- Primary objection to 3 bus gates located on Kimmage Road Lower which will sever primary access route for funeral corteges to the cremation and burial facility at Mount Jerome Cemetery ad Crematorium.
- Varying operational hours for different bus gates – lack of consistency.
- Funeral cortege routes described from 9 churches with maps of the alternative routes required to avoid the bus gates.
- Local impact of the two bus gates at Harold's Cross Park which will divert all funeral corteges along a single route at the southern end of the park.
- Funerals take place from 10:00 to 16:00 Monday to Saturday, with peak from 11:00 to 16:00.
- Northbound right-turn restriction at Grand Canal to Grove Road will divert exit traffic towards the southeast.
- Risk of local congestion on the roads adjacent the cemetery.
- Two options proposed for mitigation measures: omit the two bus gates at Harold's Cross Road and Kimmage Road Lower or reduce their operational hours to peak periods similar to those for Bus Gate No.1 at Ravensdale Park. (6am – 10am and 4pm – 8pm)



**79. The Harold's Cross Village Community Council c/o Dr. Paula Russell, 31 Westfield Road, HC**

- Umbrella organisation with delegates from 10 residents' associations.
- Scheme welcomed in general for better infrastructure for active travel modes.
- Acknowledge the benefits of bus gates, but traffic will increase on some other roads including Kenilworth Park and Clareville Road.
- Need to ensure that traffic calming measures are provided at schools.
- Bike parking on Clareville Road near the junction with Kenilworth Park should be removed to provide 2 traffic lanes.
- EIAR Chapter 4 (page 27) does not clearly describe the 24 hours restriction of southbound traffic at the most northerly bus gate in Harold's Cross. Advance warning signs will be required in both directions for this.
- Interaction with other CBC scheme bus gates in Rathmines will increase traffic on Leinster Road.
- Increased traffic at Kenilworth Square and Rathgar Avenue due to westbound bus gate at Harold's Cross Road junction.
- Concern of traffic increases of 179 to 273 vehicles per hour on various roads listed in EIAR Table 6-53. More localised traffic modelling sought in vicinity of Harold's Cross Road.
- Public realm improvements requested as mitigation.
- Previous proposal for no left-turn eastbound from Sundrive Road to Kimmage Road Lower has been omitted from the Proposed Scheme – should be included.
- Concern right-turn restriction onto Grove Road risks rat-running through Mount Drummond area.
- Notable that pedestrian crossing on Kimmage Road Lower at McGowan's pub proposed under separate planning permission.
- Additional pedestrian crossings requested on Kimmage Road Lower in vicinity of Aideen Avenue, and Kenilworth Park / Westfield Road.
- Concern of removal of footpath at southern side of Harold's Cross Park.
- Concern of impact for setting of park. Concern of damage to granite kerb stones.
- Concern re: school zones on Harold's Cross Road and Clareville Road: traffic calming measures and 30 km/h speed limits requested.
- Supportive of cycle lanes along Harold's Cross Road, but increased traffic may impact safety.
- Concern that the cycle lane on HCR is sub-standard.
- Bus gates will improve safety for cyclists along Kimmage Road Lower.

- Reservations about the Stone Boat Boardwalk in context of truncated Poddle Cycleway route that does not continue through Mount Argus.
- More public realm improvements requested in Harold's Cross Village, and regrets that previous proposals are curtailed in Kimmage Village.
- More street furniture and public realm requested on KRL particularly beyond Mt Argus Church.
- Concern of CPO of front gardens of 15 houses from 33 to 61 HCR
- Concern of CPO of lands in front of sheltered housing operated on HCR.
- Concern of impact upon heritage.
- Need for ongoing monitoring and engagement.
- Recognises this is an important project for the future of the city, believe there are opportunities to improve it overall.

#### **80. The Passionist Community, Virtus, St. Paul's Retreat, Mount Argus**

- Benefits of the busconnects scheme are recognised.
- Concern of impact upon access to Mount Argus Church
- Concern impact upon the requirement of an ageing population is addressed.
- Concern parishioners and visitors can still access the church easily.
- Concern vehicular access is maintained from Kimmage Road Lower to provide for funerals, weddings and other church events.
- Concern access to the car park is retained along Kimmage Road Lower.
- Concern of impact of busgates and request that hours of operation are reduced / amended to 6am – 10 am and 4pm – 8pm and they are only operational Monday – Friday.

#### **81. The Wine Pair c/o Canice Mckee 79-81 Clanbrassil Street Lower.**

- Appreciate the necessity of urban development projects.
- Concern of impact of construction compound and storage unit in the immediate vicinity of their business.
- Concern of impact upon access to business.
- Concern of obscuring signage and hampering business.
- Concern of impact upon outdoor seating and customer experience.
- Concern of attracting anti social behaviour.
- Construction compound should be relocated – will remove the tiny amount of green space in the area.
- Concern of high fees associated with the public consultation process.

**82. Thom's Pharmacy and Opticians c/o Fergal O'Dwyer 151 KRL**

- Concern of restricted access for customers and deliveries, due to bus gate on LKR.
- Concern of impact upon vulnerable clientele of the pharmacy.
- A lot of patients have mobility issues and arrive by private car.
- Car parking further up the street is constantly full and will not meet demand.
- Concern of how deliveries will be made to vulnerable patients.

**83. TII**

- Acknowledges and supports the Busconnects project which aims to improve public transport and address climate change in Dublin and other cities.
- The proposed scheme does not include any direct interactions with the national roads or light rail (Luas) networks.
- No observations.

**84. Yvonne McKenna 143 Corrib Road**

- Objection to bus gate 24/7, even when buses are not running
- Concern of restricted access to Bushy Park for football coaching.
- Corrib Road will become a rat-run

## Appendix 2

### Oral Hearing Recommendation – Bus Connects Project

File Refs: ABP -317660-23

Project Title Kimmage to City Centre Bus Corridor

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In light of the application documentation, third party observations and response submissions received from the applicant:

- |   |    |
|---|----|
| 1. Is there a lack of clarity or detail in the information available that would require a hearing ?                     | No |
| 2. Are there outstanding issues relating to the design approach or alternatives such as would merit a hearing ?         | No |
| 3. Are the number of submissions / complexity of issues raised in submissions such as to require a hearing ?            | No |
| 4. Are there outstanding issues relating to the justification / need for the project that would require a hearing ?     | No |
| 5. Are the nature and extent of impacts on third party properties uncertain or otherwise such as to justify a hearing ? | No |

#### **Recommendation**

Having regard to the above and as per the attached Memo 1 –

- Recommend no oral hearing be held.

I recommend that the response submission received from the first party be circulated to all other parties for comment.

Senior Planning Inspector

Fiona Fair

Assistant Director of Planning

Sarah Lynch

*Fiona Fair*  
*S Lynch*