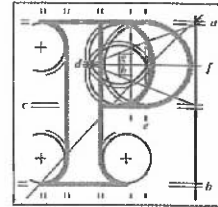


Our Case Number: ABP-314056-22



An
Bord
Pleanála

Kilmainham Inchicore Network
c/o Eamon Devoy
1st Floor Eblana House
Marrowbone Lane
Dublin 8
D08 E120

Date: 12 October 2022

Re: Liffey Valley to City Centre Core Bus Corridor Scheme.
Fonthill Road to High Street all in the County of Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA02A

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An Bord Pleanála
64 Sráid Maoilbhríde
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13th September 2022

RE: Submission in relation to Application to An Bord Pleanála for
Bus Connects Route 7: Liffey Valley to Dublin City Centre
In particular in relation to Kilmainham and Inchicore

Dear Sir/Madam,

On behalf of the **Kilmainham Inchicore Network (KIN)**, I wish to lodge a written submission and observations in relation to the proposals set out in the application to ABP re **BusConnects Core Bus Corridor Route 7 Liffey Valley to City Centre**.

The **Kilmainham Inchicore Network (KIN)** facilitates enterprise, community, cultural and environmental development and enhancement of Kilmainham and Inchicore; aiming to create a most desirable safe district of Dublin to live, work and enjoy. Within the Kilmainham Inchicore area, there are over 17 thousand residents and over 8 thousand households (CSO Census data 2016).

The **KIN** notes the intention to deliver an enhanced, reliable, efficient, sustainable public transport system across Dublin City and the accompanying reduction in traffic congestion. We believe that the current proposed plans can better deliver this without, for example, substantial reduction in green space and tree removal. We believe that the **BusConnects** plan can be achieved without undermining the urban Village of Inchicore. Indeed, the **BusConnects** plan could, with care, contribute to the Regeneration of Inchicore in a positive and meaningful way through availing of opportunities to improve the public realm along the proposed route creating a good news story for the area.

We would like to make the following *general observations* and submissions:

The opportunity to enhance and improve the public realm along the proposed route is a key element to be further developed. Additional landscape planning and tree planting needs to be developed along the Bus Corridors, in particular along routes where bus lanes are proposed.

All cycle lanes should be segregated, but this is especially important along proposed Bus Corridors.

BusConnects proposals need to be future proofed against all developments with current planning permission granted. Any proposed development plans at design stage need to be considered in order to ensure that the increase in population is factored into the BusConnects Proposals.

Thorough traffic flow analysis will need to be carried out in order to predict and plan for changes in traffic movement and quantity flows given the BusConnects proposals. The impacts of diverted traffic onto adjacent roads should be included as knock-on effects in the traffic flow analysis. This will allow a balanced outcome emerge given careful consideration to all factors.

Speed limits need to be clearly indicated on the maps. The newly designated 30KPH zones in residential areas need to be considered when deciding on Bus Corridor speed limits.

We would like to make *specific observations* and in some cases offer alternative suggestions on **BusConnects** Route 7, Liffey Valley to City Centre (in particular maps pg. 19 to 25 - concentrating on Inchicore and Kilmainham in the <https://liffeyvalleyscheme.ie/wp-content/uploads/sites/8/2022/07/03.-General-Arrangement-Drawings-1.pdf> from www.liffeyvalleyscheme.ie);

Page	Item (detail)	Submission/Comment
19	Access to Liffey Gaels Sports Grounds	Ensure safe sufficient pedestrian crossing access across Sarsfield Road into Liffey Gaels GAA Club Grounds.
19	Irish Rail Bridge across Sarsfield Road.	There is no indication in the map that consideration has been given to Dart+ South West proposal to widen the railway line bridge (on page 19) that crosses over Sarsfield Road.
18-25	Green Space Improvements - Trees	The opportunity to enhance and improve the public realm along the proposed route is a key element to be further developed. Additional landscape planning and tree planting needs to be developed along the Bus Corridor, in particular along routes where bus lanes are proposed especially along Emmet Road, Inchicore. An excellent recent addition and example of a well-managed and maintained open space is Kilmainham Civic Space, outside Kilmainham Gaol and Courthouse, Inchicore Road. With good design credentials achieved and best practice place making principles used- prioritising pedestrians; diverting non-essential traffic; widening paths and encouraging human interactions - are all lessons to be learnt from Kilmainham Civic Space.
20	Memorial Road	Detail on pedestrian crossing across N4/N6 from Memorial Road missing. This junction is extremely busy and with extra traffic now proposed the pedestrian crossing junction will be very important.
20&21	Tree Removal Grattan Crescent (bus lanes and dual carriage way proposed)	Welcome adjustment to plans re maintaining trees at Grattan Crescent. Improve Public Realm including: retaining wide paths, develop new pedestrian crossing and traffic calming measures. Mirror the high quality and excellent standard of public realm improvements as completed in 2015 at Kilmainham Civic Space (Inchicore Rd outside Kilmainham Gaol) and contribute to the regeneration of Inchicore Village in a positive and meaningful way. Remove Bus Stop on West side as there is a bus stop less than 50m away on Sarsfield Rd.
20	Pedestrian crossway Grattan Crescent	Pedestrian crossing between Inchicore National School and Grattan Crescent Park. Another pedestrian crossing is needed at this junction.
20&21	Bus Lane and dual Carriage Way at Grattan Crescent	Welcome adjustment to plans the Introduction of one-way system for motorists (continuity of one-way traffic along Inchicore Road heading west) and bus lanes.
21-22	Bus Lane Emmet Road	Include landscape planning and tree planting along Emmet Road. No new trees included on Emmet Road proposed bus route, this needs to be addressed and trees added. Suggested removal of some car parking spaces and replacement with trees on Northside of Emmet Road

Page	Item (detail)	Submission/Comment
21	Pedestrian Toucan Cross	Addition of toucan pedestrian crossing at 147 Emmet Road. This is a busy junction, especially as it entrance to St Patrick's Athletic FC Richmond Park as well as numerous retail and café premises on north side of Emmet Road.
21	Land acquisition outside 105 Emmet Rd	Retain pedestrian access to Myra Close at this point. CPO has been removed, pedestrian access to Myra retained. Again, no new trees included on Emmet Road proposed bus route, this needs to be addressed and trees added.
22	Luby Road/Emmet Road junction	Luby Road/Emmet Road pluvial flooding area; high runoff down Luby Road. Need to consider flood zone areas and flood alleviation through SUDs intervention. Need to consider the Water Framework Directive "good status" of water quality by 2027 and reduce runoff into Camac River at this section. At least trees should be planted near this junction.
23	Old Kilmainham / Emmet Road/ SCR cross roads	Outbound traffic builds up along Old Kilmainham due to traffic turning left at SCR cross roads. This may be due to LUAS crossing at Suir Road and traffic blockages here creating traffic build up back from that junction. Review LUAS crossing at Suir Rd. Allow for better traffic flow through this junction such that backups at Old Kilmainham/SCR junction are relieved.
24	Bus Gate at proposed entrance to NCH, Old Kilmainham	What are the future traffic implications of the Westbound Bus Gate at Old Kilmainham on Traffic Flow along Kilmainham Lane and Eclin St and James Walk? Linear Park proposal being developed for James Walk. Traffic flow and parking here need to be examined in conjunction with bus gate proposal.
26	Cycle lane along James's St adjacent to LUAS tracks	There is no designated cycle-lane adjacent to the Luas Tracks on James's St. The abrupt end to the cycle track and narrowness of the section of road given to cyclists between the path and LUAS track should be addressed. With the suggested increase in Bus Traffic along this road, a designated cycle track needs to be developed. Informal cycle provision is noted with the new green cycle link James Street to SJH via Echlin Street, where will it connect with? Is there a proposed cycle route through St James's Hospital? Noted proposed signal crossing at Cromwell Quarters.

KNOCK – ON EFFECTS	
Green Space Improvements - Trees	<p>The opportunity to enhance and improve the public realm along the proposed route is a key element to be further developed. Additional landscape planning and tree planting needs to be included along the Bus Corridor, in particular along routes where bus lanes are proposed especially along Emmet Road, Inchicore.</p> <p>An excellent recent addition and example of a well-managed and maintained open space is Kilmainham Civic Space, outside Kilmainham Gaol and Courthouse, Inchicore Road. With good design credentials achieved and best practice place making principles used- prioritising pedestrians; diverting non-essential traffic; widening paths and encouraging human interactions - are all lessons to be learnt from Kilmainham Civic Space.</p>

Key Mobility Infrastructural Developments:	The completion of (1) Grand Canal Cycleway and (2) Camac Greenway, (3) NTA GDA Route 06 Cycleway down Vincent St West are key mobility infrastructural developments are necessary in tandem with Bus Corridor to allow better, safe and improved cycle network travel across Kilmainham and Inchicore.
River Camac Greenway	The NTAs Greater Dublin Area Proposed Cycle Network includes development of the Camac Greenway from Heuston Station through Kilmainham and Inchicore continuing towards Drimnagh Castle. We fully support the development of Camac Greenway and would encourage its development and delivery in line with the proposed BusConnects Programme. The development of this segregated cycling infrastructure will make cycling safer and more attractive to users as well as improve sustainable transport linkages in this area.
Traffic Diversion	The impact of suggested no-right turns at Sarsfield Road and Emmet Road as well as the bus gate at Old Kilmainham will have knock on effects on other roads' traffic due to increased diversions. Thorough traffic flow analysis will need to be carried out in order to predict and plan for changes in traffic movement and quantity flows given the BusConnects Route 7 proposals. The impacts of diverted traffic onto adjacent roads should be included as knock-on effects in the traffic flow analysis of the proposed BusConnects Route 7. This will allow a balanced outcome emerge with careful consideration and compromise achieved.
Residents along proposed Bus Routes	Resident's, living along BusConnects routes, concerns and implications of the proposed BusConnects design on homes adjacent to the route will need to be seriously considered in order to ensure minimum disruption to people, their property and the wider local community.
ERROR IN DOCUMENT: EIAR Appendix A16.2	
EIAR Appendix A16.1-A16.3 Architectural Heritage (liffeyvalleyscheme.ie)	There is an error in document EIAR Appendix A16.1-A16.3 page 25 with an incorrect description of the railway bridge describing it as a bridge over the Camac river.

The **Kilmainham Inchicore Network** represents Residents, Businesses and Community Groups in the neighbourhoods of Kilmainham and Inchicore. The KIN note the objective of delivering a more integrated and efficient bus system to alleviate congestion and to accommodate our growing population. It is also important to us that the NTA decision makers recognise the serious implications that the proposed Bus Connects will have on our neighbourhood and hence on our lives.

We hope you favourably consider our submission.

Yours sincerely,



Observers Name: Eamon Devoy,
Independent Chairperson, Kilmainham Inchicore Network

Observers address: Eamon Devoy, Independent Chairperson, Kilmainham Inchicore Network,

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