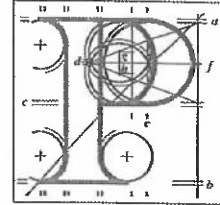


Our Case Number: ABP-314056-22



An  
Bord  
Pleanála

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

**Date:** 04 July 2023

**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 case. The contents of your submission have been noted.

If you have any queries in relation to the 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

CH08

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Niamh Thornton

---

**From:** LAPS  
**Sent:** Friday 30 June 2023 15:20  
**To:** Niamh Thornton  
**Subject:** FW: RE ABP reference 314056-22 Liffey Valley to City Centre Core Bus Corridor  
**Attachments:** ABP Ref 314056.22 KIN Submission to ABP re Bus Connects Route 7 Liffey Valley to City Centre 300623.pdf

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**From:** Aoife Hannan <aoife.hannan@dublincity.ie>  
**Sent:** Friday, June 30, 2023 2:55 PM  
**To:** LAPS <laps@pleanala.ie>  
**Cc:** 'Eamon Devoy' <devoyeamon@gmail.com>  
**Subject:** RE ABP reference 314056-22 Liffey Valley to City Centre Core Bus Corridor

Dear Niamh,

Good to speak to you on the phone earlier. Thank you for your letter to Eamon Devoy, Chair of Kilmainham Inchicore Network (KIN), with regard to our submission re NTA's proposed Liffey Valley to City Centre Core Bus Corridor dated 1<sup>st</sup> June 2023. On KIN's behalf Eamon Devoy (cc'ed) would like to take the opportunity to respond to the NTA's submission to ABP, please find attached letter.

As requested by your letter, 1<sup>st</sup> June 2023, the following information is included in our letter:

1. ABP reference number 314056-22
2. Name and Address: Independent Chair Eamon Devoy – Kilmainham Inchicore Network, 6 Tyrconnell Road (ground floor office), Inchicore, Dublin 8.
3. Eamon Devoy is acting on behalf of Kilmainham Inchicore Network, 6 Tyrconnell Road, Inchicore, Dublin 8.

Best Wishes

Aoife

Aoife Hannan

**Kilmainham Inchicore Network Project Manager**

**Inchicore Regeneration Consultative Forum Forum Director**

087 127 3428 [aoife.hannan@dublincity.ie](mailto:aoife.hannan@dublincity.ie)

[www.kilmainham-inchicore.ie](http://www.kilmainham-inchicore.ie) [www.facebook.com/kilmainhaminchicorenetwork/](https://www.facebook.com/kilmainhaminchicorenetwork/) [http://twitter.com/K\\_I\\_Network](http://twitter.com/K_I_Network)

1st Floor, Eblana House, Marrowbone Lane, Dublin 8.

A Dublin City Council Initiative.

\*\*\*\*\*

I work flexible hours and send emails outside normal office hours, no need to respond to my emails outside yours.

Smaoinigh ar an timpeallacht sula ndéanann tú an ríomhphost seo a phriontáil. Please consider the Environment before printing this mail.



KILMAINHAM  
INCHICORE  
NETWORK

[www.kilmainham-inchicore.ie](http://www.kilmainham-inchicore.ie)

An Bord Pleanála  
64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

30<sup>th</sup> June 2023

RE: KIN submission in relation to NTA submissions (received by ABP 26<sup>th</sup> Oct 2022 and 22<sup>nd</sup> March 2023) in relation to ABP – 314056-22 Application  
Bus Connects Route 7: Liffey Valley to Dublin City Centre  
With particular reference 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 submission received from National Transport Authority (NTA) dated 26<sup>th</sup> October 2022 and 22<sup>nd</sup> March 2023 with regard to the application to ABP 314056-22 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*:

The opportunity to enhance and improve the public realm along the proposed route is a key element to be further developed.

- Trees:

Having reviewed the Landscaping General Arrangement (EIAR Vol.3 Ch.4 Section 5) maps we believe that between Map 18 and 26 there will be a removal of 18 trees. Map 23 at entrance to New Children's Hospital suggests a loss of 15 trees. In total 23 new trees are proposed for the route between map 18 and 26. The net gain in trees is 5. We believe that this net gain needs to be

substantially increased and that at detailed design stage more trees are included along the route, especially along Emmet Road.

- **Bike Stands:**  
Landscaping General Arrangement maps (EIAR V.3, Ch.4 S.5) do not indicate that many bike racks will be included along this section of the route (between map 18 and 26). Two new bike racks are indicated on map 20 at Grattan Crescent and outside 124 Emmet Road. There are numerous recently installed Sheffield bike stands along Emmet Road (for example outside McDowells Pub, 139 Emmet Road and near 122 Emmet Road) in car parking spaces. In the Landscaping General Arrangement maps these bike stands are not noted. We request that at the detailed design stage these bike stands are retained in line with promotion and alignment with National Active Travel Schemes.
- **Segregated Bike Stands**  
Again we request that at detailed design stage that all cycle lanes should be segregated, but this is especially important along proposed Bus Corridors.
- **Future Proofed**  
BusConnects proposal needs to be future proofed against all developments with current planning permission granted or under consideration by ABP, such as the Emmet Road Development. Any newly approved development plans need to be considered at NTA detailed design stage in order to ensure that the increase in population is factored into the BusConnects Proposals.
- **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.

Previously in our observations to ABP re we made *specific observations* 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](http://www.liffeyvalleyscheme.ie) ):

Given the EIAR Landscaping General Arrangement Drawings the following observations still stand:

Page	Item (detail)	Submission/Comment
19	Access to Liffey Gaels Sports Grounds	Ensure safe sufficient <b>pedestrian crossing</b> access across Sarsfield Road into Liffey Gaels GAA Club Grounds. The NTA response outlines two pedestrian access points to the Park and improvements to both pedestrian crossings 30m west of both access points. This is welcomed by KIN.
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. The pathway under this bridge needs to be upgraded to universal design standards such that wheelchair users and buggies are able to use this path.
18-25	Green Space Improvements - Trees	As already mentioned 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.

Page	Item (detail)	Submission/Comment
		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.
19	Con Colbert/ Memorial Road	<p>Detail on pedestrian crossing across N4/N6 from Memorial Road include the removal of pedestrian crossing on the West side of this junction over the N4/N6. While the signalised pedestrian crossing proposed on the eastern and southern sides of the Con Colbert/Memorial Road level of service improvement is due to be increased it does not take into account the desire lines of pedestrians crossing on the western side.</p> <p>The Liffey river path and the Irish National War Memorial Gardens (INWMG) are increasingly being used for recreation by the local community and for active travel particularly by young children and their carers going between Gaelscoil Inse Chór and Inchicore Model School. This junction also forms part of a proposed strategic active travel route linking the Grand Canal to the Royal Canal via the proposed OPW Lutyens bridge for pedestrian and cyclists across the Liffey linking the INWMG to the Phoenix Park.</p> <p>This junction is extremely busy and with extra traffic now proposed the pedestrian crossing junction will be very important.</p>
20	Grattan Crescent	<p>Welcome adjustment to plans re maintaining trees and removal of bus stop at Grattan Crescent. Welcome improved Public Realm including: retaining wide paths, seating, enhanced quality stone paving. We propose mirroring the high quality and excellent standard of public realm improvements as completed in 2015 at Kilmainham Civic Space (Inchicore Rd outside Kilmainham Gaol).</p> <p>We propose that the recycling bins located outside Inchicore NS are relocated underground as part of the public realm upgrade works at this junction.</p> <p>This will contribute to the regeneration of Inchicore Village in a positive and meaningful way.</p>
20	Pedestrian crossway Grattan Crescent	<p>Pedestrian crossing between Inchicore National School and Grattan Crescent Park. According to the landscaping general arrangement plan a pedestrian crossing is being proposed at the south end (village end) of the park as well as an upgrade to the pedestrian crossing at Sarsfield Road/Inchicore Road/ Grattan Crescent junction. Both crossings are welcomed.</p>
20	Enhancement of Inchicore Village – DCC Public Realm Improvements	<p>Dublin City Council Kilmainham Inchicore Development Strategy has secured funding for Inchicore Village Public Realm Improvements (DCC Capital Programme 2023-2025). A coordinated approach between both NTA and DCC at detailed design stage of CBC7 is necessary to allow coordinated upgrade public realm improvement works to take place in Inchicore Village.</p>

Page	Item (detail)	Submission/Comment
20-22	Bus Lane Emmet Road	Include landscape planning and tree planting along Emmet Road. Very few new trees have been included on Emmet Road proposed bus route, we request that more tree planting is included in the detailed design. Suggested removal of some car parking spaces and replacement with trees on Northside of Emmet Road
20	Pedestrian Toucan Cross	The maps suggest that "Concrete paving to Church/Stadium area – to tie into existing" is included in the landscaping general arrangement, we propose that this also includes a toucan pedestrian crossing at 145 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.
20	Sheffield Bike stand at 139 Emmet Road	No indication has been given that the Sheffield bike stand in a former car space outside 139 Emmet Road is to be retained. We request that this is retained and indicated as such in the detailed design.
21	Sheffield bike stand near 122 Emmet Road	No indication has been given that the Sheffield bike stand in a former car space outside 139 Emmet Road is to be retained. We request that this is retained and indicated as such in the detailed design.
21	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.
25	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. The suggested "Quiet Street Treatment" alternative cycle route option from James Street to SJH via Echlin Street (west bound) will add extra 50% journey route to cyclists, it is not realistic (or acceptable) to believe that commuter cyclists will take this detour. This issue needs to be addressed.

The following knock on effects still hold and should be considered:

<b>KNOCK – ON EFFECTS</b>	
Green Space Improvements - Trees	The opportunity to enhance and improve the public realm along the proposed route is a key element. 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. 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.

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 <b>BusConnects</b> 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.
Residents along proposed Bus Routes	Resident's, living along <b>BusConnects</b> routes, concerns and implications of the proposed <b>BusConnects</b> 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.

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,  
Ground Floor Office, 6 Tyrconnell Road, Inchicore, Dublin 8.

Contact details: [devoyeamon@gmail.com](mailto:devoyeamon@gmail.com) 087 667 5298

[www.kilmainham-inchicore.ie](http://www.kilmainham-inchicore.ie)