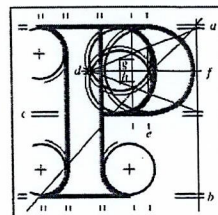


Our Case Number: ABP-317660-23



**An
Bord
Pleanála**

Isabelle Walsh
6 Mount Argus Way
Harold's Cross
Dublin 6W
D6W Y966

Date: 26 September 2023

Re: Busconnects Kimmage to city centre core bus corridor scheme
Kimmage, 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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

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

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

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

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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

To: An Bord Pleanála

Strategic Infrastructure Division

64 Marlborough Street

Dublin 1 D01V902

Observation also submitted online to the Strategic Infrastructure Division

24 September 2023

Re. Kimmage to City Centre Core Bus Corridor Scheme Observation & Objection

Dear An Board Pleanála Members,

My name is Isabelle Walsh and I live in Mount Argus Way, Dublin 6W. I would like to make you aware of my serious concerns with the proposed Cycle Path that is part of the Kimmage to City Centre Bus Corridor Scheme. Please find enclosed a letter that we, the Committee of the Mount Argus & Church Park Residents Association, have drafted and circulated among the residents, and that explains our main concerns.

In addition to this letter, I would like to draw your attention to two points:

- 1) The Kingfisher Project, located at Blarney Park on the banks of the River Poddle at Kimmage is a project dedicated to the preservation of wildlife. They very recently won a Dublin City Award for the second year as a community project. They have been working hard for years to encourage the conservation of the River Poddle that runs at the Stoneboat and along Mount Argus Way, where the Cycle Path is proposed. They are very aware of the historical and cultural significance of the Stoneboat and its surrounding ecosystem, and are also very much opposed to the idea of the proposed Cycle Path. I understand that they are also drafting their own submission to you to share their concerns.
- 2) I also believe that the Ministry for Arts, Culture and Heritage was in the process of considering restoring the plaque that indicates that the 'Stoneboat built in 1245 AD was restored by Tiernan Builders 1990 AD', while it was proposed that a Cycle Path would go over the Stoneboat on a 'steel boardwalk structure'. This feature needs to be preserved rather than at a risk of damage by a potential Cycle Path.

For the above-mentioned reasons and the ones described below, we urge you to reconsider the proposal for a Cycle Path to go through the Stoneboat and Mount Argus Way. On behalf of the Mount Argus & Church Park Residents Association, we have put forward our views to all our Councillors and have met and discussed with TD Ivana Bacik, Councillor Freehill and Councillor Connelly over the last few years on many occasions.

I would like to submit an observation outlining our strong, considered and robust objection to the proposed Kimmage to City Centre Bus Corridor Scheme in lieu of the disproportionate, adverse and potentially detrimental impact it will have across our Community. (This includes the 400+ residents)

Our estate comprises families young and old in the area, third-level students, working professionals, pensioners, homeowners, renters and more. We have engaged with our diverse, currently positively spirited community, as well as the wider Kimmage Business Community to discuss this plan and we have all come to the conclusion that it would have detrimental effects on our community and alternative plans should be considered.

Residents of Mount Argus & Church Park are walkers, cyclists, bus passengers and motorists. Like all residents of the city, we use combinations of all these modes of transport to meet our personal, familial and social needs. We have a vested interest in seeing strong, positive improvements in all our transport structures and our communities. As a resident, I will participate constructively with any genuine process of engagement that will balance these various goals. This observation has been submitted in that spirit and ethos.

The proposed creation of a Cycle Path from Sundrive Road through our young, vibrant and busy estate should not be supported by your Body.

I have outlined and would like to share with you our concerns on the Cycle Path as it is currently proposed below.

The previous version of the Kimmage – City Centre bus connects, proposed a quiet cycle route, which created an opening between Sundrive Road and Mount Argus Way, which then ran through Mount Argus Park; across the Mount Argus Church car park; then along Mount Argus Road, reconnecting with the main spine corridor at Harold's Cross Park. This had certain merits in creating a quiet cycle way of meaning full length, approximately 950m.

The revised option, having been unable to maintain the route through the private grounds of Mount Argus Church, now proposes a pointless, at best minute-long, long-cut shared with standard traffic, through Mount Argus only, reconnecting with Lower Kimmage Road at the entrance to Mount Argus Park. The length of this route is 344m, which is longer than if a cyclist remained on the cycle track at Sundrive Drive and turned left into Lower Kimmage Road using the current advisory cycle route. This route is 266m.

Clearly, the benefits to cyclists will be negligible. As stated in the Environment Impact Assessment Screen Report, the existing advisory cycle lanes will be retained [on Lower Kimmage Road] and not altered, as the road conditions would be much enhanced as a result of the reduced general traffic for which the Bus Gate will facilitate. Therefore, any potential claims for increased safety are spurious.

In addition to this point, I am going to list below a number of additional concerns.

1-Loss of cultural heritage asset

According to the EIA Screening Report for the Kimmage to City Centre Core Bus Corridor Scheme (Page 17), the proposed scheme will direct cyclists from Sundrive Road via a new connection to Mount Argus Way and Mount Argus View via (quote) 'a proposed steel boardwalk structure over the River Poddle (and the Stone Boat feature)'.

As you can see listed in Table 4.4 of the same document the Stone Boat weir is actually registered as a monument under RMP/SMR No. DU018-043003, ITM 713915, 731387. The Stone Boat is a significant cultural heritage asset. It was built during the medieval times in 1245 to split the River Poddle, with

one branch supplying Dublin city and the other branch supplying the local mills. Dublin City Council has considered it as one of the highlights of a walking trail in Harold's Cross.

It would seem preferable to celebrate our cultural heritage asset, rather than to undermine it and potentially damage it under a new boardwalk structure.

2-Lack of Consultation & Results showing where Cycle Path's in Enclosed Estates Work for the Communities

A question that has come to the forefront of every member of our estate, including Resident Committee Members, is whether there is any evidence whatsoever whether a Cycle Path such as the one proposed, has been put through an enclosed, populous, busy residential estate in the past, utilising the already close proximity dwelling access spaces like this? In this case, where the current proposed Cycle Path is situated, it is proposed by the NTA that a recently built wall in the 90's immediately adjacent to a large Apartment Complex be taken down, that subsequent terrace housing cul-de-sacs be turned into thruway traffic flows and where a Cyclist enters our estate via a previously non-existent access point.

I would like to put it on record that the NTA never engaged with our Association or any member of Estate Community to discuss this proposal despite our Community being a significant stakeholder where the Cycle Path is proposed to run directly through the centre of our already busy Estate.

To Note:

Bus Connects High-Speed Bus corridor already includes street markings for a cycle lane on each side of the corridor, evident on the plans, Map 5 Preferred Route, page 29 specifically refers to the carriage area being for 'no through traffic except buses, taxis and cyclists. Why, therefore, on a road with city-bound traffic being removed due to the presence of a bus gate in addition to fines for those using the bus corridor, would the separate cycleway be required adjacent to the corridor? We would argue that some very serious reconsideration of the current proposal is required in order to ensure the best result for our Estate Community and the wider Community of Kimmage. It is clear that the best proposal is some way away from the points already mentioned in this observation and objection.

3-Lack of Consideration to the Area's Past and their Efforts to Improve Community Spirit & Safety

We would like to point out that the builders of the Mount Argus Estate, Tiernan Development, had to increase wall height in the '90s due to the high levels of criminal activity and burglaries (escaping through Dublin 12). The Gardai were needed to support the requests for these works to be carried out by Tiernan Development, something the residents were extremely grateful for.

Only after increasing these wall heights and the subsequent completion of the Mount Argus Square Apartments including its boundary wall, did the levels of criminal activity begin to decrease as those responsible no longer had a means of escape where they could not be pursued by the Gardai. Ironically, it is this very same wall by the Mount Argus Square Apartments that is being proposed to be removed once again. A potential case of déjà vu perhaps? We would ask An Bord Pleanála to reflect on this utter lack of understanding of our Community's history in this current proposal of a Cycle Path.

Furthermore, having it as a dedicated Cycle Path proposed in our Residential with a high-quality new surface will:

- Increase speed hence escape where required not to mention the increased Health & Safety concerns it brings with it.

- As a Cycle Path, entrance not wide enough for Garda pursuit – same issue as above.
- The Bus Connects high-speed corridor contains specifically marked cycle lane designated space on each side, also referred to on page 29 of their proposal.
- Mount Argus Estate traffic will increase significantly, easily and effectively becoming an unofficial ‘park ‘n ride’ while drivers switch onto the buses.
- Access and Egress from the varied areas both within the Estates and also down along Mount Argus Road will be impacted upon, including Health & Safety concerns.

4-Loss of biodiversity

To build the new connection for the cyclists, the document notes that (quote) ‘there will be works on the adjacent riverbank [of the stoneboat], which has the potential to result in significant permanent negative effects’ (page 29).

The Mount Argus Estate, due partly to its proximity to the River Poddle and Mount Argus Park is extremely rich in biodiversity and this is cherished by its residents who feel particularly grateful to live in an area within Dublin City where wildlife has been preserved and encouraged. Residents are also delighted to share these moments regularly with other members of the community who visit Mount Argus Park for recreational purposes with families, friends or pets, and also those who attend to get a few minutes of quiet, peaceful serenity from the stresses of modern-day living that we can all experience from time to time. We would argue that the Park serves a great purpose to the people of Harold’s Cross in its current state. Changing the makeup of our small sized park to include a Cycle Path for the use of hustle and bustle City Centre commutes would most certainly taint and thus discourage the members of our Community mentioned above from continuing to visit Mount Argus Park as we know and cherish it.

The Residents Association would like to draw An Bord Pleanála’s attention to Eamonn Ceannt Park (See appendix 1), adjacent to the estate where we feel an upgraded Cycle Path would suit the needs of both cyclists and the wider Community as it is a much bigger park and already contains a path nearly wide enough to accommodate cyclists, something that community members witness on a daily basis. We feel efforts and monies could be much better spent in Eamonn Ceannt Park to deliver a Cycle Path for the Kimmage Community.

You may be aware that recent scientific reports have highlighted the further decline of biodiversity in Ireland. On 9 May 2019 Dáil Éireann declared a ‘biodiversity crisis’, making Ireland the second country to do so. Dublin City Council declared a biodiversity crisis for Dublin City on 14 October 2019¹. Surely the proposal to build a boardwalk around the riverbank and encourage additional heavy bicycle (and inevitably footfall) traffic there is contrary to Dublin City’s desire to protect biodiversity.

I would also like to point out that with any building or development project, there is increased pollution as a direct result of any and all work carried out. Residents have also voiced concerns about small losses in Biodiversity in the affected areas in the estate. We fear the loss of wildlife in the form of trees, shrubbery and greenery in our small estate as a result of this Cycle Path (and other associated works) being forced on our quiet, green, peaceful estate.

¹ <https://www.dublincity.ie/news/dublin-city-council-launches-consultation-100-point-action-plan-biodiversity-conservation>

Further to a formal meeting between The Mount Argus & Church Park Residents Association and Bríd Brosnan of Dublin City Council together with Lorraine Bull, Biodiversity Officer with Dublin City Council, it came to light that they were not aware of the plan to direct the cycleway through the rear of Mount Argus Park. Here is another stakeholder, the Parks Division of DCC not engaged with appropriately. Over the past year, the Biodiversity arm of DCC together with Eamonn Dunne, DCC Parks Division have worked on improving the park, resurfacing pathways and developing of the biodiverse 're-wilding policy'. The area planned for the cycleway is directly along the 're-wilding' hedgeway in addition to coming down the side of the River Poddle along Mount Argus Way before entering the Park itself off Mount Argus View. If the cycleway is approved to go through Mount Argus Park, the planting and re-wilding works carried out by the council including the planting will be removed to make way for the cycleway.

5-Increased Danger to Cyclists and other road users, including Mount Argus and church park Residents

It is proposed that cyclists will share the road on Mount Argus Way and Mount Argus View. There are two severe bends at Mount Argus View, both of which in the context of also introducing the Cycle Path proposed, are extremely dangerous. The visibility on both sides is very poor, the road is very narrow and cars are very often parked there. It is impossible for two cars to meet at the same time and it is up to one driver to stop to let the other vehicle go through first. There have been many near misses involving vehicles already on that particular spot.

Cyclists are vulnerable road users, and to encourage and facilitate them to share this particular road with vehicles is a reckless idea and is likely to lead to accidents involving the target market for the Cycle Path, namely Cyclists and our Community within the Estate, many of which have families with small children, who in particular would be at risk in their home estate whilst facing a potentially long, miserly queue of cyclists rushing at high speeds to get into Dublin City Centre for work in the morning, whilst the children in our Community attempt to use the space to walk to Pre-School and Primary School. I would ask that An Bord Pleanála consider this scenario in their review as it would become a regular occurrence for all Cycle Path users and members of our Estate. I would argue that the above is a scenario that neither the cyclists nor any member of our Estate would want to encounter when they see their children off to school each day and we would urge that all parties see sense in this regard and reject the proposal of a cycle path through our large, busy, but peaceful estate.

I would also like to highlight that the proposed Cycle Path would not help to ease any of the main road traffic problems in the area. As a resident, I would like to point out to An Bord Pleanála (and any other interested party that may not live in the area) that the main source of traffic problems, delays and bottlenecks occurs further along the Lower Kimmage Road at the Harold's Cross Bridge. We would argue that the Cycle Path proposed to cut through our entire Mount Argus Estate will not ease the main source of the problem. We have noted in previous points the damage the Cycle Path would cause environmentally to our Biodiversity. This point aims to support these by highlighting the lack of any material benefit a Cycle Path would give any potential users.

6- Questionable Necessity of the Cycle Path as Currently Proposed

I would like to highlight that Lower Kimmage Road already has a decent, frequently used Cycle Lane which is well kept. We would argue that only minor improvements would be required to the current Cycle Lane to increase its safe usage for all road users. To our knowledge, most cyclists based on Lower Kimmage Road would never use the proposed Poddle Park through to Sundrive Road through Mount Argus Estate Cycle Path and would prefer to use the current cycle lane already available to them.

An alternative route was drawn up by our Residents Committee but we didn't get any engagement on it (see Appendix 1)

It is my opinion that this entire new proposed Cycle Path route makes no sense and is not an improvement to the efficient and effective cycle lane our community already has, even disregarding the negative impact the proposed Cycle Path would have on our estate and community. The old adage of "if ain't broke don't fix it" springs to mind for this proposal although I do agree that the current cycle lane could be improved from a safety perspective with the addition of plastic, rubber, poles between the cycle lane and main road, similar to those recently installed on Clanbrassil Street Upper, Dublin 8. A small improvement, but a big reward for the entire community and I would hope that An Bord Pleanála considers this in its review of the entire Scheme.

7-Increase in anti-social behaviour

Last but not least, in order to allow access to Mount Argus Way from Sundrive Road it is proposed to eliminate the wall that currently exists at the end of Mount Argus Square. We anticipate that as a result of this, there is likely to be an increase in anti-social behaviour from individuals circulating through that passage. You may be aware that there has already been anti-social behaviour from individuals jumping the wall and a fencing was erected as a result on top of the wall (where the ivy now grows) to deter this. We would urge An Bord Pleanála to heed the advice of An Garda Síochána who could provide details of such incidents of anti-social behaviour. Long-term Residents have recalled that anti-social behaviour was widespread and particularly unpleasant and intimidating, and the fencing made a significant improvement. Eliminating the wall would undermine all the significant efforts that have been made in the last few years by Dublin City Council and the Mount Argus and Church Park Residents Association together to eradicate anti-social behaviour in the estate. Please note that Mount Argus Park is not a gated park and it is accessible 24h. Facilitating the access to the park through the proposed cycle path would only increase anti-social behaviour at night time, an issue that residents have still to report from time to time to the Garda, in addition to littering which is also a problem the residents are facing every time a volunteer park clean-up is organised.

In conclusion:

In summary, to remove the wall entirely now would be completely and utterly counterintuitive and we would ask An Bord Pleanála to consider this in its review. Supporting an initiative that has proven recent links to increased anti-social behaviour in the Community cannot be seriously considered. Residents fear that increased antisocial behaviour could permanently scare Residents, damage Community spirit and consequently lead to more pollution arising from rubbish ending up in the Park, in the River and in the shrubbery that currently thrives in its current environment, noting the help and hard work that is currently provided for residents and volunteers in the Residents Association to keep the Estate thriving and clean in this regard. For all the above-mentioned reasons I am strongly opposed to the proposed Cycleway going through Mount Argus Estate. I would be grateful if you could consider our strong points made above when reviewing the Kimmage to City Centre Core Bus Corridor Scheme Observation & Objection and urge the NTA to reconsider replotting the route of the Cycle Path to and through Eamonn Ceannt Park. (as illustrated in Appendix 1)

In addition, the proposed cycle path does not consider the Health and safety issues associated with it. The increasing numbers of children who are using the park will face a speed throughway for cyclists, and many going to church will meet a section bisecting the path where no controls such as lights etc. are in place like those which already exist out on the main Kimmage Road. Additionally, the increased human traffic volumes with the new residents from both the Mount Argus Mill development and the

Transitional Accommodation Hub with 77 units and a considerable volume of children must all converge together on a blind corner with the cyclists on the point of entry/egress to and from the park.

I thank you for taking the time to look over our submission and I trust that the observations contained herein are considered a valuable contribution, both from a Developmental but also a Health and safety, Environmental and Strategic aspect as there are a number of areas of concern, not just for our own Residents but also for the significant Community Members accessing Mount Argus Park, Mount Argus Church and Sundrive Road.

We are very concerned with this proposal as the proposed cycle path raises concerns for a number of reasons including Health and safety, and crime escalation in an area that has seen a significant reduction in recent years due to Community cooperation, awareness, Garda assistance and subsequent intervention. This intervention included the increasing of wall heights in certain areas of our Estate. The plan to remove these walls and undo the good work that has been completed in the estate in recent years seems to lack any critical, rational thinking and the residents cannot support this proposal in its current form on that basis.

As presented, the proposals appear to lack understanding and empathy for residential community life.

Yours Faithfully,

Isabelle Walsh
6 Mount Argus Way
Harold's Cross, Dublin 6W
D6W Y966
Tel: [REDACTED]
Em [REDACTED]

Appendix 1

Alternative cycle way

Through park, greenway cycle

Clogher road has sufficient width to allow for segregated cycleway to meet up with Canal

Slightly longer but the additional safety benefit should encourage usage

Potential direct access could be established through the Council depot opposite Blarney Park, further reducing mixing with traffic.



Distance ?

1,993.48 m ▾

Existing proposal

Mostly along narrow road with designated but not protected cycleway.

Mostly urban

Not enough width for designated protected cycleway



Distance ?
1,860.81 m ▾