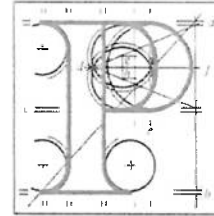


Our Case Number: ABP-317660-23



**An
Bord
Pleanála**

Jeff Kelly
5 Mount Argus View
Harolds Cross
Dublin 6
D6WXR70

Date: 12 December 2023

Re: Bus Connects 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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8 December 2023

**Re: Kimmage Cross Road to City Centre Bus Connects Scheme
An Bord Pleanála Reference: 317660**

Dear Sir/ Madam,

I live on Mount Argus View and I wish to lodge my objection to the Kimmage Cross Roads (KCR) to City Centre Scheme, An Bord Pleanála Reference: 317660.

Cycle Way Proposal

I strongly object to the opening up of the Mount Argus Estate onto Sundrive road for the proposed cycle way. The cycle way raises concerns for a number of reasons including health & safety, from a crime escalation point of view and environmental perspective.

The cycle way is proposed to come down through Ravensdale Park from Kimmage Road West, cross Sundrive at Supervalu, continue straight into the current cul de sac by Gallery 23, through the wall via 'A Boardwalk' at Mount Argus Square Apartments, continue down onto Mount Argus View out to Lower Kimmage Road. This proposal causes me significant concerns as I live directly along the proposed route. The creation of a dedicated cycle way with a high-quality new surface will increase speed of cyclists going past my family home and will be a danger to my children. I have two young children aged 3 and 6 who cross the road at Mount Argus View to play in the park. I have grave concerns for their safety and the safety of the children who live in the area. At present cyclists do not stop at the pedestrian lights on Lower Kimmage Road often nearly hitting children so I foresee a dangerous environment for my children growing up with this cycle way on their doorstep. Children live in the Mount Argus Square Apartments with no segregation from the proposed cycle way. The cycle way will be very dangerous for these children and level of danger is unacceptable.

There are a number of 90 degree turns on the proposed route with blind corners which gives rise to the likelihood of accidents. People who live in houses on Mount Argus Way and Mount Argus view will have to be very careful reversing out of driveways with the cycle way in place. Who will have right of way? An increase in the number of cyclists will cause a continual delays for homeowners with cyclists crossing at busier times.

As well as the young, the old will be put in danger with the cycle way as a lot of elderly people cross Mount Argus View to get to Mount Argus Church. They will now have to run a gauntlet to get safely to the other side of the road. Danger levels will increase for evening mass during the winter. In terms of use the cycle way will be used by bikes going at high speed, electric bikes and electric scooters which have already caused a number of deaths due to high speeds.

The Bus Connects high speed bus corridor also includes street markings for a cycle lane on each side of the corridors, and 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 cycle way be required adjacent to the corridor?

Anti-social behaviour is problem in Mount Argus Park, the houses on Mount Argus View bearing the brunt of this behaviour. When this estate was being developed Tiernan Developments had to increase wall height in by Mount Argus Crescent & Green in the 1990's due to levels of criminal activity & burglaries. The Gardai supported requests for works to be carried out by Tiernan Developments. Only after increasing wall heights between Mount Argus Estate and Sundrive Road and the subsequent completion of the Mount Argus Square Apartments including its boundary wall, did the levels of criminal activity begin to decrease. The current proposal will remove these protections. The residents

of the estate are continually engaging with the Gardai due to recent anti-social behaviour. As the cycle way entrance will not be wide enough for Garda pursuit it will create the perfect environment for an increase in anti-social behaviour and burglary. The new proposed cycle way will serve as a getaway route for those involved in these activities. I would be interested in hearing the Gardai's perspective on this.

In term of biodiversity & re-wilding, further to a formal meeting between the Mount Argus & Church Park Resident's Association and Bríd Brosnan of Dublin City Council (DCC) together with Lorraine Bull, Biodiversity Officer with DCC, it came to light that they were not aware of the plan to direct the cycleway through the rear of Mount Argus Park. An example of one key stakeholder, the Parks Division of DCC not engaged with appropriately.

Over the last few years the biodiversity arm of DCC together with Eamonn Dunne, DCC Parks Division have worked on improving the park, resurfacing pathways and development of the biodiverse 're-wilding policy'. The area planned for the cycleway is directly along the 're-wilding' hedge way 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. This is unacceptable.

Bus Connects Proposal for Lower Kimmage Road.

I was shocked to see the proposed changes to Lower Kimmage Road and once again I would strongly object to these proposals. I would base these objections on the impact on the community, impact on commercial activity and environmental concerns.

Kimmage Cross Road to Hazel Park junction

Traffic will come from Fortfield Road, Kimmage Road West or Terenure Road West where bus priority will be given at junction of KCR. KCR junction acts as a thoroughfare for the community coming in and out of Dublin city. Giving buses priority here will lead to congestion and prevent locals from going around their day to day business. This will have knock on effect of traffic in other parts of the city.

Two inbound bus stops will be removed and replaced by one bus stop nearer to Ravensdale junction. So it is being proposed that bus stops are removed. This makes no sense when locals are pushing for more bus services and bus stops.

There will be no through road for cars to Lower Kimmage Road between 6am-10am and 4pm to 8pm. This proposal will severely restrict local access. My elderly parents live on Terenure Road West and visit us to see their grandchildren. They will be prevented from following their usual route between these times. This will also impact business, schools and churches in the area.

Traffic will have to turn left onto Ravensdale Park to access the city centre. Poddle Park will be a cycle way sharing with local residential traffic. It is proposed to impose a two-way traffic restriction (i.e. vehicular through traffic is not permitted in either direction) on the Poddle Park branch of the junction. Vehicular traffic will be able to access Poddle Park (and Blarney Park) via Cashel Road and Stannaway Road. Traffic coming out of Ravensdale Park will not be able to turn left during these times. This will impact on access to community, commercial activities, religious and educational facilities. It will lead to increased traffic and congestion on alternative routes e.g. Stannaway Rd, Whitehall Road, Clogher Road, Clareville Rd, Terenure Road West, Harolds Cross, Terenure. Diverting traffic from a wide major road down narrow residential streets with multiple cars parked on the road will causes further congestion and frustration. The scheme discriminates against people who are not able bodied who cannot cycle or walk everywhere, and the elderly (a huge portion of the local population) people who have no choice but to drive everywhere.

Bus Connects Proposal between Sundrive Cross Roads to end of Kimmage Road Lower/Harold's Cross Park/McGowan's Pub

It is proposed that traffic on this section of road will be local in the main or coming from Rathgar via Kenilworth Park or Clareville Road. A bus gate 24/7 in both directions At Sundrive Cross Road and before Harolds Cross Park. This will significantly reduce access for the local traffic coming from

Sundrive Road at it will not have access to Harold's Cross. Traffic from residential roads in Mount Argus Estate, Mount Jerome/Harold's Cross won't have access up to Sundrive Crossroads. Access and egress to and from Mount Argus Park, Gandon Close, St. Clare's Road and Mount Jerome will be from the Terenure/Harold's Cross Road side of the Harolds Cross Park.

Once again this section of the proposal will have a detrimental impact on access for the community, commercial activities, religious and educational facilities. The one way systems proposed cut off people from the local shopping centre including recycling facilities in Sundrive shopping centre and access to the city. It will have a serious impact on the elderly and those attending churches which will have a knock on effect on dwindling attendance numbers. My family will be personally affected as we will be cut off from my elderly parents and I do need quick access to Terenure in case of emergency. Equally so as outlined above my parents will find it difficult to visit their grandchildren.

For those coming from Harolds Cross, access to Sundrive Road will be via Kenilworth Park/Clareville Road. Once again diverting traffic from a wide major road down narrow residential streets with multiple cars parked on road to cause further congestion and frustration.

The cycle lanes proposed along this section are too narrow and will not be used by cyclists as they are too dangerous. The cyclists will use the middle of the car lane, slow traffic down and lead to further congestion.

Final Observations

Dublin City is Georgian City which will be destroyed by this Bus Connects plan which is not fit for purpose. Such a proposal would be suited to a modern city with wide roads. The impact on the local community, commercial activities, religious and educational facilities are completely unacceptable. Above all there are elements of this plan which put the most vulnerable in the local community, the young and the old at serious risk.

An archaeological survey of the route has assessed the impact the scheme may have on archaeological heritage. In most cases, such as at Kimmage Road Lower and Mount Argus Road, there is the potential for the discovery of new, undiscovered below ground archaeological features.

The proposals indicate that there will be less bus shelters, no real increase in bus numbers or bus drivers. Buses will be full by the time they reach Harolds Cross so this proposal will be of no benefit to the community based in this area. Noise from buses will increase as they will be travelling at more speed along these corridors.

COVID 19 has impacted working life, and the way people work. The proposed bus corridor plan was developed before COVID lockdown, and the plan is no longer appropriate given the fact that a lot of people work from home now. Is this actually needed at all?

It is worth noting that there have been road work changes to Sundrive Cross Roads already which seem to align with the bus connects proposal. Just at the corner of Sundrive Road and Lower Kimmage Road the road used to be wide, and some cars parked there. A few weeks ago, the path was extended to narrow the road, prevent parking and a narrow cycle lane was put in. It is now very dangerous as the road is so narrow and it difficult for cars turning on to Lower Kimmage Road from Sundrive Road. Cyclists are not using the cycle lane as its too narrow rather cycling in the middle of the car lane causing further danger and congestion. It would seem some works on the Bus Corridor are being undertaken already as its assumed that approval of the plan is "done deal". Very worrying.

I am concerned that this plan may only be changed by a change of government and that may well be what it takes. The local community have not been considered and have been forced to fight against plans to ruin this city. As well as being charged to file objections there has been a huge amount of taxpayer funds wasted on these plans. We can only imagine how much the over spend would be if the plan was implemented. I believe an underground system is needed for Dublin city and the metro system that was proposed for this side of the city would be welcome. We do not welcome this Bus Connects Proposal and I firmly believe it needs to be rejected.

Your faithfully,

Jeff Kelly