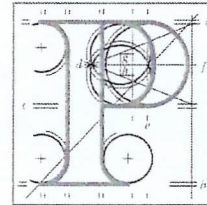


**Our Case Number:** ABP-317660-23



**An  
Bord  
Pleanála**

Jim O'Brien  
52E, Mount Argus Road  
Harold's Cross  
Dublin  
D6WHW32

**Date:** 29 November 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.

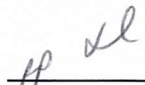
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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](mailto: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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## Observation on Bus Connects Kimmage Core Bus Scheme

### An Bord Pleanála Reference 317660

I would like to make the following observations on the proposed Bus Connects Kimmage Core Bus Scheme. I was very happy with the original scheme proposed by Human Transit but I am very concerned that as the proposals developed the scheme became watered down and that, whilst the bus routes were still being introduced, many of the public realm improvements proposed in the scheme have been reduced or abandoned altogether.

The current proposals are introduced by the following explanation of the fundamental idea of the scheme:

*The Kimmage to City Centre Core Bus Corridor Scheme (the Proposed Scheme) will support integrated sustainable transport usage through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future services who will use the corridor.*

I would like to note the following – these are based on the proposals in my immediate locality (Harolds Cross / Kimmage) – although I would suspect that similar could be found along the whole of the proposed scheme.

#### Harolds Cross Park

The current scheme involves the removal of the public footpath along the southern edge of park on the small road that joins Harolds Cross Road to Kimmage Road. I have contacted the scheme designers and they have confirmed the rationale for this decision:

*Response: This is necessary to allow widening of the road for two-way traffic to access Mount Jerome Cemetery in conjunction with the proposed bus gates on Kimmage Road Lower on the western side of Harold's Cross Park. There is another footpath available on the southern side of the street, as well as more direct path through the park when it is open.*

There is a line of trees immediately within the fence of the park along this line. These trees have been there since the park was constructed more than a hundred years ago. These trees are not part of any survey by the project arborist and there is no specific plans in place to protect the trees. There is a significant level change between the park and the road below. The excavation works to remove the existing footpath and to build up the new road formation will fundamentally damage the tree roots and there is little hope of the trees surviving.

There are currently two gates from the park that lead on to this side of the road – one that goes to the entrance at the junction at Harolds Cross Road, the other leads directly onto the footpath to be removed. This is a safety issue for all park users and especially for the many children who use the park on a daily basis – both recreationally and as a route to the local schools (Educate Together and St Clare's). The current scheme on proposes that everyone will have to cross the road multiple times as a replacement of the use of the current footpath at present. There is no proposal to introduce new pedestrian or zebra crossing to make this safer.

The scheme proposes that pedestrians can use the park to make their journey safety – the park is unlit and hence is closed during hours of darkness. In winter the park is closed from 4pm onwards. The safe walking environment is being removed as part of the scheme to *“support integrated sustainable transport usage through infrastructure improvements for active travel (both walking and cycling)”*.

This section of the road currently has two-way traffic flow. There are a number of parking spaces on the south side of this road which makes this road narrow. This works very well as a means of slowing down traffic speeds – which makes this road safer.

As per the explanation - the removal of the footpath is purely to increase traffic speeds. This is for private car traffic – there are no buses that use this section of the road either currently or as part of the Bus Connects Scheme. This is against current planning guidelines as it prioritizes motor traffic. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (2009)*.

Design Manual for Urban Roads and Streets (DMURS) guidelines state: Prioritise walking, cycling and public transport, and minimise the need to use cars; the removal of this public footpath is not in line with this guidance.

Design Manual for Urban Roads and Streets (DMURS): Minimum footway widths are based on the space needed for two wheelchairs to pass each other (1.8m). This is the only public footpath that is currently to public footpath width standards at access points to the park. The path width along the Lower Kimmage Road where 2 access points to the park are located are 900mm wide at park gate points. This means that these paths do not allow for universal access and also mean a barrier has to be positioned along the path edge to prevent accidents between traffic and pedestrian. There does not seem to be any proposal for barriers.

There are five houses along this road these either have off road parking to the front of the house or off the laneway behind the house. I do not want to remove these spaces because of their slowing effect on traffic but as this road is so essential to the scheme - these could be removed as an alternative to removal of the footpath.

The proposal is there for two reasons - to aid private cars to drive faster and to protect parking spaces - Neither of these make sense within the original idea of the scheme. The removal of the footpath needs to be rejected completely.

#### **Lower Kimmage Road south of the Junction with Sundrive Road.**

Where Kimmage Road Lower meets Sundrive Road /Larkfield Park. The final scheme shows the removal of the existing cycle lanes from Bedford Court down to the crossroad. The original schemes showed Public Realm improvements to the front of the shops on Kimmage Road Lower and these now seem to have been abandoned completely. There is an addition of 20 new parking spaces on Lower Kimmage Road (East Side). These are in addition to the 60ish parking spaces on the west side

of the road in front of the shops, the 23 spaces in the public car park adjacent to Paddy Power on Sundrive Road, and the 167 spaces in the SuperValu car park. The 60 or so spaces on the footpath are also illegal and dangerous as the access is over the footpath and the parking is substantially on the footpath.

The design rationale for this is:

*The existing cycle lanes are part-time advisory and on-street parking is permitted at other times. The residents on the eastern side of the street requested improved parking in front of their houses, which have no driveways, to remove the need to park elsewhere some of the time. In the context of the removal of the main through traffic between the proposed bus gates, NTA considered it unnecessary to retain the part-time advisory cycle lanes through Kimmage Village in this location. Instead it is proposed to provide indented parking spaces on the eastern side of the street with new trees in build-outs to improve the public realm. With very low traffic flows and a 30 km/h speed environment cyclists can comfortably share the road with traffic over this short section. The Proposed Scheme also provides an alternative "quiet street" cycle route to the west through Blarney Park and Mount Argus Way.*

*On the western side of Kimmage Road Lower in front of the shops and businesses, the NTA offered to provide public realm enhancements outside of the Proposed Scheme extents, but this was rejected by the property owners. NTA did not consider it appropriate to include this area in the Compulsory Purchase Order for such ancillary improvements, and therefore the previous proposals were omitted from the Proposed Scheme.*

In short in order to provide infrastructure improvements for active transport – a key driver for the whole scheme – cycling infrastructure is being removed and replaced by permanent on street parking. The proposed public realm improvements – which were shown with lovely illustrations in the original proposals and all the discussions documents up to the current iteration - are being removed to protect private and illegal parking.

The additional parking spaces and removal of the cycle lane on the east side of Lower Kimmage Road are putting cyclists at risk and making cycling less safe and attractive. The removal of the public realm improvements and removal of the cycle lane on the west side make the area less safe for both cyclists and pedestrians. This is done to facilitate footpath parking.

The board should reject completely the proposed scheme to this area. The cycling facilities / pedestrian facilities / Public Realm improvements must be reinstated to the original proposals. As noted above there is no shortage of parking to this area. The houses have parking available behind the houses via the existing laneway. The current proposals have abandoned completely the fundamental reasons for this scheme – as well as being against current planning guidelines.

### **Changes to the Poddle Cycleway**

As part of the original proposal the Poddle Cycleway after coming across the new entrance at the Stoneboat proceeded through Mount Argus Park, passed in front of Mount Argus Church, and then down Mount Argus Road. Mount Argus Road was to have a quiet street treatment. The cycle route then joined Harolds Cross Road at the Entrance to the Russian Church / Mount Jerome Cemetery.

The route has now been amended to divert down Mount Argus Way onto Kimmage Road Lower at the entrance to the Mount Argus Estate. This pushes cycling traffic onto the main road earlier.

The reasons for this change:

*The property owners at Mount Argus Church objected to the initial proposals for the cycle route across their grounds. NTA concluded therefore that with very low traffic flows between the proposed bus gates and a 30 km/h speed environment cyclists can instead comfortably share the road with traffic over the section of Kimmage Road Lower between Mount Argus and Harold's Cross Park.*

The cycle route in front of Mount Argus Church runs through the car park.

Again the proposals are being watered down from the original scheme which enhanced active transport. This has been done to protect private parking. (again). The NTA has altered the scheme at the behest of the priest at Mount Argus Church. The net result is that cyclists are pushed into traffic much earlier than before. Public realm enhancements (Quiet Street Treatment to Mount Argus Road have been removed (again).

The most direct route for cyclists using the Poddle Cycle Way is as per the old scheme. It is likely that people will use this route anyway – the current scheme is just pretending they won't.

I would request that as a minimum the Quiet Street Treatment for Mount Argus Road be reinstated. I would like the NTA to issue Compulsory Purchase orders for the route through the Car Park and the original scheme be reinstated.

Overall – based on the review of the areas closest to my home – the differing iterations of the Kimmage Scheme have consistently ignored the intention to support integrated sustainable transport. Whilst the bus routes are maintained everything else about the scheme has now reverted to protecting private car parking at any cost. The Public realm improvements have been abandoned as too much cost, too much trouble, or a risk to parking. The scheme should be revisited with the intent of removing car parking and returning to the original goal of integrated sustainable transport.

Kind Regards,

Jim O'Brien