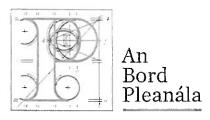
Our Case Number: ABP-317660-23



Paddy Glynn 56 Lower Kimmage Road D6WYY39

Date: 15 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

## Bus Connects Dublin: 'Kimmage to City Centre' Core Bus Corridor Scheme An Bord Pleanála Case reference HA29N. 317660

Observations from D6WYY39, Anston, 56 Lower Kimmage Road, Paddy Glynn, Andrina Wafer.

To whom it may concern

We are a household of five adult citizens, participating in working and academic life. We commute on foot, by bike, using public transport and by private car. Core values include a deep commitment to heritage, to our community and a shared concern with mitigating the impact of climate change.

The 'Kimmage to City Centre' Corridor is arguably the most historic of Corridors because

- It tracks the route of the Poddle river, from which the city derives it name, with all the implicit vulnerabilities and delights.
- Every single style of vernacular architectural heritage can be traced along the few short miles
  of it's course, from medieval ruins, nationally acclaimed cathedral, unique Dutch Billy
  remnant, Regency, Georgian, Victorian, Art Nouveau, Art Deco, 1930s public housing
  schemes to 1950 cottage style, through to modern, with industrial heritage, Victorian park, a
  national site of pilgrimage and worship, and a cemetery and crematorium that awaits
  development with a national visitors centre.
- It follows the route of the only escapees from Dublin Castle, now the course of the annual Art O'Neill Challenge.
- It crosses the Grand Canal Georgian to Victorian city boundary, nodding to Swift, the Huguenots, Leopold Bloom and Robert Emmet, and in the present day, to a thriving community of poets, writers, artists, musicians, actors and Creatives, storytelling for generations to come.

The current proposal for the development of a Bus Corridor has been significantly altered and mitigated from the original arising from sustained engagement with the NTA and local community via LOKRA, our resident's association. LOKRA continue to reflect the carefully researched views of the majority of the community the length of Lower Kimmage Road.

We would like to note especially that we believe that our narrow, winding residential historically important road is at heart unsuited to the proposed high volume arterial transport route and that other roads initially evaluated by Barry remain better suited, especially in the light of subsequent publications for the development of light rail transit, potentially, though unspecified, and accordingly deeply concerningly, on Bus Corridor routes.

The publication of vague future plans implicating with a lack of specificity subsequent to the submission of the NTA proposals to An Bord, undermined our trust in the associated institutions for the governance of the city and of transport arrangements generally.

Our community is broadly supportive of the current proposal, informed by the current openly held consultation, and is in no way a blank cheque for any other development. Lower Kimmage Road is unsuited to light rail and to bi-articulated buses. We cautiously support the current proposals, with caveats.

1. The introduction of such significant change across the city must be <u>transparently monitored</u> over a significant period of time (beyond teething) with <u>public accountability to the</u>

community directly impacted by the proposed changes. Resident's experience of the impact must be highly ranked in the prioritisation of evaluative measures. Our homes represent the single most significant investment of our lives which we have been fortunate enough to have been able to make and work hard to sustain. This must be respected, including by those who simply wish to pass by.

- 2. <u>Cumulative traffic data modelling must be made available</u> across the broad neighbourhood. This was promised and not delivered.
- 3. Please <u>re-instate the weekday only 7-10 am 'no left turn' at Sundrive Cross</u> onto Lower Kimmage Road. Pre Covid, one third of traffic coming down our road came in this direction. The efficacy and reliability of continuous service of buses on this corridor will be undermined unless this is re-instated. Without this very limited mitigation, Lower Kimmage Road residents north of Sundrive Cross experience few of the benefits of the Bus Corridor in reduced traffic and pollution, and all the disadvantages.
- 4. Lower Kimmage Road is fortunately situated close to several wonderful <u>schools</u> catering for pre-school age, primary and secondary age children. Their <u>safe</u>, <u>independent travel</u> is important. Accordingly, this household supports the development of 'school zones' and extended 15kmph stretches proximal to the schools on Clareville Road, and on Harold's Cross Road and access roads. See also point 5, 6, 7, 8, 9, 11.
- 5. Speeding private vehicular traffic has been a dangerous feature of our daily lives. The NTA proposal offers a healthier safer road for residents and for our neighbours from other roads, with finally the promise of reduced speed. We welcome this warmly. We would be grateful if the introduction of reduced speed limits could be expedited more swiftly as a statement of value on our lives, health and wellbeing, acknowledging the relationship of speed to emissions, including from tyres on EVs and hybrid cars.
- 6. Please require <u>public realm enhancements by developing a continuous surface ('raised table' effect) on crossings</u> at Casimir Road junction, Kenilworth Park junction, Westfield Road junction, Priory Road junction and at Aideen Avenue to facilitate mobility aid users, people with buggies and children using scooters to get to school.
- 7. Please introduce pedestrian crossings at
  - a. McGowans (concurrent with the Bus Gate, as previously agreed in the School Transport Plan) and
  - adjacent to the Bus Stop 2390 (Kenilworth Park) to facilitate crossing to the Park and Schools, and to Mount Argus, and Mount Argus Road safely (especially at night via the securely lit Mill Apartment scheme) and to St Gladys Nursing Home.
- 8. <u>Cyclists</u> in our household are concerned about the <u>quality of the proposed road surfacing</u> for Lower Kimmage Road and request a better-quality treatment. Additionally, it is noted that <u>cyclists will typically choose the most direct route and appreciate the introduction of the Bus <u>Gates with associated reduction in volumes of traffic and speed and implicitly enhanced safety.</u></u>
- 9. The Bus Gates are welcome in that
  - a. they are not permanent infrastructure and are adaptable.
  - The <u>Bus Gate at Ravensdale</u> would make more sense if it provided greater safety for commuting school children and remained <u>closed to vehicular traffic for longer</u> <u>periods</u>.
  - c. However- the Bus Gate at the <u>northernmost tip of Harold's Cross Park</u> seems to lack justification based on data provided; without a verifiable defence it raises concerns that this is a tentative step towards a development such as was initiated with horrific

result at Patrick Street and towards Christ Church. Please desist and <u>remove this Bus</u> Gate.

- 10. The proposed treatment of the gracious <a href="Emmet Bridge">Emmet Bridge</a>, an important visual landmark, listed as part of the National Inventory of Architectural heritage, protected as part of the City Development Plan, is a crude solution to a 'pinch point' for vehicular and cycling traffic that pays no respect to aesthetic sensitivity. It is recommended that the <a href="re-instatement of the right hand turn for vehicular traffic down the length of the canal and the prioritisation of bus and cycling traffic over the bridge</a> would be more acceptable. Please consult the Environmental Impact Assessment report.
- 11. The proposed treatment of the landmark Victorian <u>Harold's Cross Park</u> is unacceptable from both a heritage and public safety perspective. Children use this path on bikes, scooters and on foot to access both the Park and the schools. It is strongly recommended that the pavement is not removed to facilitate additional vehicular traffic.
- 12. We support the <u>resistance of private households to land-take</u> through CPO of their gardens for the development of a short bus lane on Harold's Cross Road, and of the demolition of a home at Harold's Cross Bridge. The destruction of streetscape to facilitate traffic is unnecessary and unimaginative.
- 13. The technology exists for 'whitelisting' for residents and should be strongly considered for limited zones given the sacrifice that everyone is making in personal parking for the sake of commuters from elsewhere.
  - a. The overall living condition, features, cost and sacrifice of residents living in Corridor impacted zones has to be considered holistically. Many residents do not have land which facilitates personal <u>parking</u> space and may have to rely on adjacent streets and competitive tolerances, acknowledging changing dynamics and expectations. Residents have already sacrificed what other neighbourhoods would not easily countenance.
  - b. Parking should have **E-charging facilities** inbuilt where such is planned.
- 14. Making bus gates acceptable for those who live within and without this area requires a multi-faceted strategy and commitment. Beyond reasonably priced fares, ticketing strategies, reliable services, it also requires <u>micro-mobility availability</u> including the provision of accessibility devices for those who need them across neighbourhoods. An Bord Pleanala is asked to consider making such pilots a condition of implementation.
- 15. <u>Park and ride provision</u> must be made at the city boundaries at affordable rates and in sufficient quantities to motivate and support the transition towards the use of public transport.
- 16. We note the <u>limited investment in public realm</u>, in <u>biodiversity</u>, in <u>landscaping</u>. The proposed <u>median with trees</u> as a focal point at Ravensdale is very much welcomed, noting that this redresses former road widening efforts of a previous era, but without restoration to homeowners. None-the-less, it will provide a strong visual reference point for the road.
  - a. The <u>Kimmage Crossroads</u> (KCR, an established landmark), Sundrive Cross, and the Kenilworth Junction are all important nodes which could benefit from public realm treatment.
  - b. LOKRA has proposed the development of sculpture appropriate to the evocative historicity of the Larkfield and Sundrive naming of the Cross reflecting the strength of commitment across the community to biodiversity and the natural environment; this could assist in placemaking.
  - c. A focus on tree planting at Sundrive Cross rather than the provision of some 52 parking spaces would have greater support of our neighbours resident at that point

of the road. If trees are being planted, we request that watering facilities be provided simultaneously to enable their nurturing with some ease.