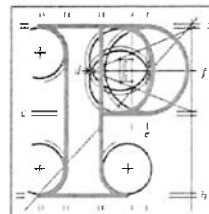


Our Case Number: ABP-317660-23

Your Reference: The Passionist Community



**An
Bord
Pleanála**

Virtus
5th Floor, Glass House
11 Coke Lane
Smithfield
Dublin 7
D07 WNP2

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 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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902

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AN BORD PLEANÁLA	
LDG-	068 544-25
ABP-	
08 DEC 2023	
Fee: €	50.00 Type: Charity
Time:	16:26 By: Hanel

8th December 2023

An Bord Pleanála (Strategic Infrastructure Division)
 64 Marlborough Street
 Dublin 1
 D01 V902

Dear Sir/Madam,

BUSCONNECTS KIMMAGE TO CITY CENTRE CORE BUS CORRIDOR (ABP REF: HA29N.317660) – SUBMISSION ON BEHALF OF THE PASSIONIST COMMUNITY, ST PAUL’S RETREAT, MOUNT ARGUS

Virtus are instructed by the Passionist Community, St Paul’s Retreat, Mount Argus (hereafter “the Passionist Community”) to submit this observation in relation to the above application for the Kimmage to City Centre Bus Connects Corridor Scheme (ABP Ref: HA29N.317660). The submission relates to the impact of the proposals on the operation and services offered by Mount Argus Church (hereafter, “the Church”).

The deadline for submissions is 8th December 2023. Payment of €50 is made alongside this submission.

Background

The Church provides two – and sometimes three – Masses each day, including an evening Mass at 6.15. There are also confessions, morning, and evening, on most weekdays. There are usually between 90 and 100 funerals each year, only one third of which are of people living within the local parish. Many of the people who come to the Church live outside of the local parish and a large number each week are first-time visitors who do not know the local area.

The Church is the home of the Tomb of Saint Charles of Mount Argus. A blessing with the Relic of Saint Charles is given every morning and, on most afternoons, and is popular with visitors from the entire country, particularly those who are suffering from illnesses. Throughout the day, there are visitors coming to pray at the tomb of Saint Charles.

Mount Argus Church is closely associated with An Garda Síochána, with regular funerals and anniversaries taking place to honour past and serving members of the force. These ceremonies are highly orchestrated and vehicle dependent events which requires constant access to be maintained on all public entry points into the church grounds.

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Consequently, a very high number of visitors that will make the journey to Mount Argus Church come from far afield, adding further the requirement for constant, straightforward easy access to and from the church grounds.

The main vehicular entrance to the church grounds is located off Kimmage Road Lower, with a controlled access off Mount Argus Road to the east (which is normally opened only on the occasion of a funeral going to Mount Jerome Cemetery), as well as pedestrian access through Mount Argus Park. Car parking provision within the main car park compound at the front of the church.

The main entrance has parking provision for circa. 10-12 car spaces which serve nearby residents and is in the charge of Dublin City Council.

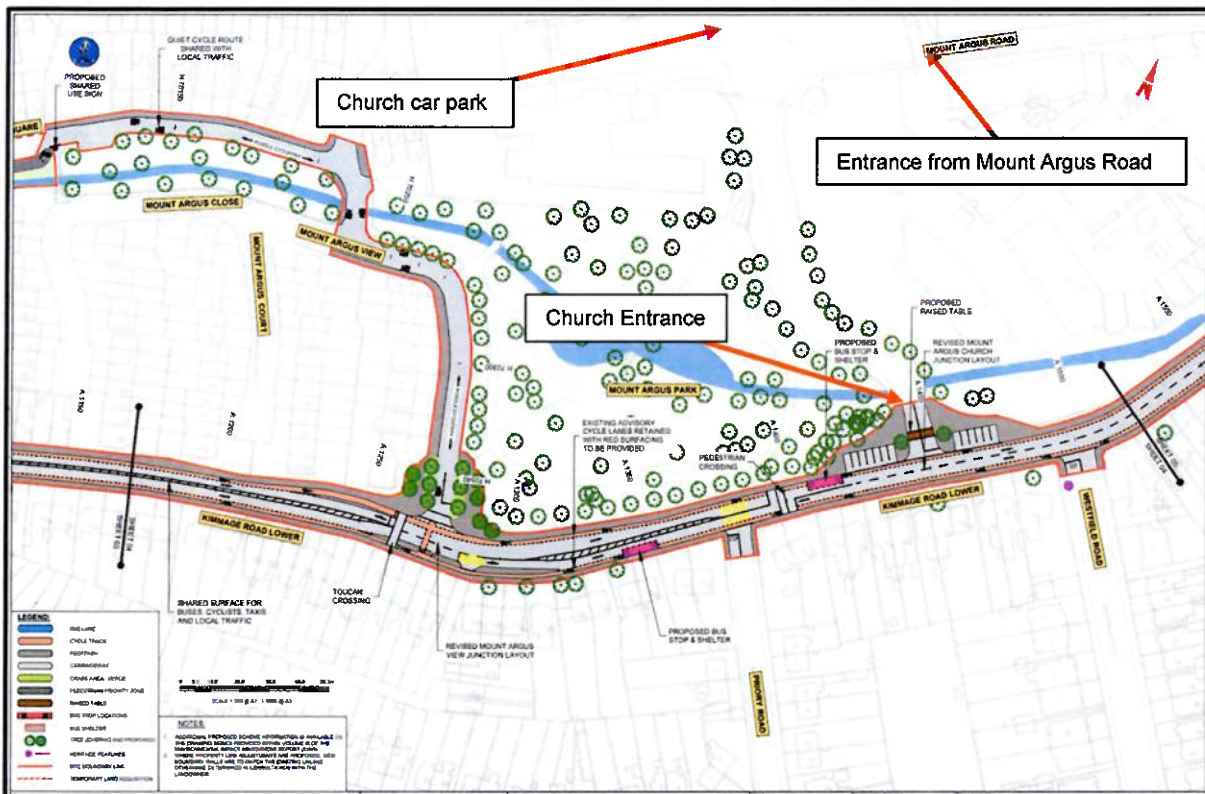


Figure 1: Church and Car Park

Planning Policy

National Planning Framework 2040

The National Planning Framework 2040 (the NPF) sets out the national planning policy for the country. The NPF sets a strong framework for compact growth and consolidation of our existing

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towns and cities. Specific reference is also given to support for a range of public transport projects. National Strategic Outcome 4 is Sustainable Mobility, and Strategic Investment Priority 4 is for Environmentally Sustainable Public Transport. The overarching support for projects such as BusConnects is noted.

The NPF also provides for communities. National Policy Objective 30 relates to meeting the requirements of an aging population. It states:

“Local planning, housing, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans”.

This demonstrates a need for proposals such as BusConnects to acknowledge and address the requirements of an aging population.

Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA) 2019-2031 transposes the national policy to a regional level. The objectives of compact growth and sustainable mobility are carried over to this document.

RPO (Regional Policy Objective) 9.1 sets out that Local Authorities shall ensure the integration of age friendly and family friendly strategies in development plans and other relevant local policy and decision making, including provision of buildings and public spaces are designed so that everyone can move around with ease, avoiding separation or segregation.

RPO 9.12 states that in planning policy formulation and implementation, local authorities and other stakeholders shall be informed by the need to cater for all levels of disability, through the appropriate mitigation of the built environment and in particular for the needs of an aging population.

Dublin City Development Plan 2022-2028

The Church is located within the administrative area of Dublin City Council. The Development Plan comprises the Dublin City Development Plan 2022-2028.

Policy QHSN14 states that it is the policy of Dublin City Council *“to support the entitlement of all members of the community to enjoy a high-quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design / planning needs”.*

QHSN17 is *“to promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle...”*. QHSN18 reiterates the same point.

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With regard to places of worship, the Development Plan states:

"The Council recognise the need for a range of religious facilities as an important component of community infrastructure. Places of worship often provide a community resource through which the residents of a neighbourhood can gain information, education, medical or welfare assistance and social contact".

Policy SMT22 states that it is policy of Dublin City Council to support the expeditious delivery of key sustainable transport projects including, *inter alia*, BusConnects Core Bus Corridor Projects.

The Church is located on lands zoned Z15. The objective for such lands is: *"To protect and provide for community uses and social infrastructure"*. The Development Plan states: *"It is the policy of the Council to promote the retention, protection and enhancement of the city's Z15 lands as they contribute to the creation of vibrant neighbourhoods, healthy placemaking and a sustainable well-connected city"*.

Proposals Adjacent to the Site

The proposals adjacent to the site comprise:

- The introduction of BusConnects works to Kimmage Road Lower.
- The introduction of "Bus Gates" to both the south west and north east of the Church along Kimmage Road Lower to stop the passing of private cars:
 - One to the south west to operate between 6am to 10am & 4pm to 8pm, 7 days a week.
 - Two to the north east to operate as 24hr, 7 days a week.
- Reorganisation of surrounding road, including pedestrian access improvements to the main entrance to the Mount Argus Church as well as enhanced car parking provisions in replacement of the existing spaces.

Submission

Virtus and the Passionist Community have reviewed the proposed development. The proposals are broadly welcomed, and the benefits of the scheme are noted. However, this subject to some minor observations which would address the Passionist Community's concerns.

The Mount Argus Church provides an important service to their parishioners, and it is very important that any works do not impede ease of access to the Church. The Passionist Community's main interests are as follows:

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- To ensure that parishioners and visitors can still access the church easily by car, foot, bicycle and public transport.
- To ensure that vehicular access is maintained to the Church from Kimmage Road Lower to provide access for funerals, weddings, and other church events.
- To ensure access to the main car park, is retained for parishioners and visitors at all times, including during the construction phases along Kimmage Road Lower.
- To ensure all access routes leading to the main church grounds are not severely impacted by any proposed works, and post-construction and operation stages.

The works proposed in the vicinity of the Church comprise improvements to bus and cycle facilities and the provision of "Bus Gates" on certain sections of Kimmage Road Lower.

A Bus Gate is a measure by which only certain traffic will be allowed to pass through a certain point in the road. In this instance, there are three Bus Gates which are relevant to the Church and the access restrictions they will impose. The first two Bus Gates, marked on map below, propose a Bus Gate to the north east of the main church entrance on Kimmage Road Lower and Harolds Cross Road and on Harolds Cross Road.

The proposed two-way Bus Gates will allow only buses, public service vehicles and bicycles to pass this point 24hrs a day, 7 days a week. Private cars will not be allowed to pass through this Bus Gate at all. Traffic that would normally come from Harolds Cross towards the Kimmage Road Lower, will instead have to divert via Harolds Cross Road and Kenilworth Park Road to access the Mount Argus Church entrance. This would lead to significant difficulty and congestion along this road during peak times for the church.

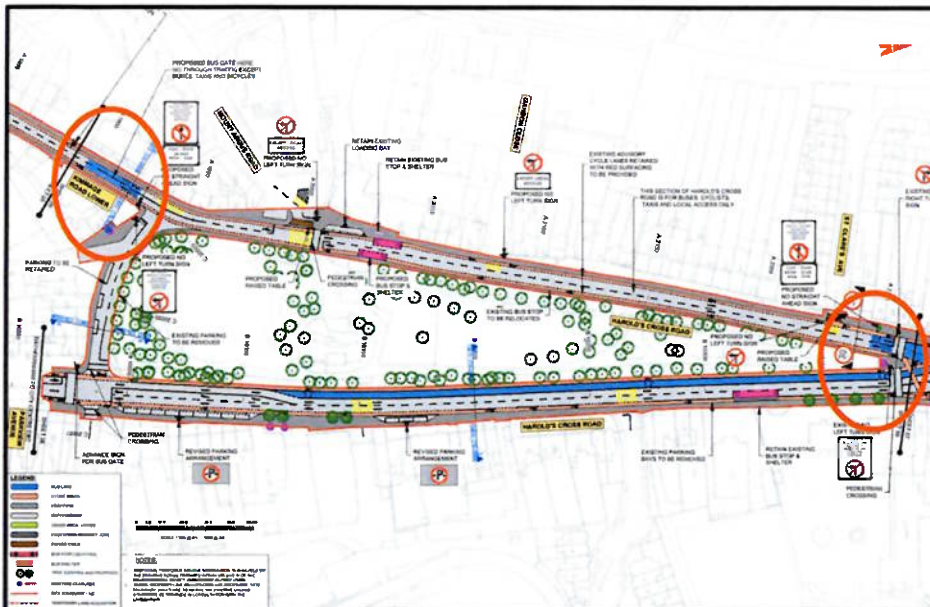


Figure 2: Bus Gates to the north east of the Church

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Figure 3: Alternative Route to Mount Argus Church

The third Bus Gate of note to the Mount Argus Church is proposed at the junction of Kimmage Road Lower and Ravensdale Park Road. This proposed Bus Gate will restrict access heading towards the City Centre and Mount Argus Church to only allow only busses, public service vehicles and bicycles to pass this point between 6am and 10am and 4pm and 8pm, 7 days a week. Private cars will not be allowed to pass through this Bus Gate during these hours.

During these hours of operation of the Bus Gate, traffic would need to divert either (i) northwest towards Cashel Road, Stannaway Road & Sundrive Road or (ii) via Tenure Road West, Tenure Road North, Harolds Cross Road, and Kenilworth Road to access the main entrance to the church grounds. This would be restrictive for early morning users and impact on the ability to access the church for parishioners and visitors coming from south-west of the church.

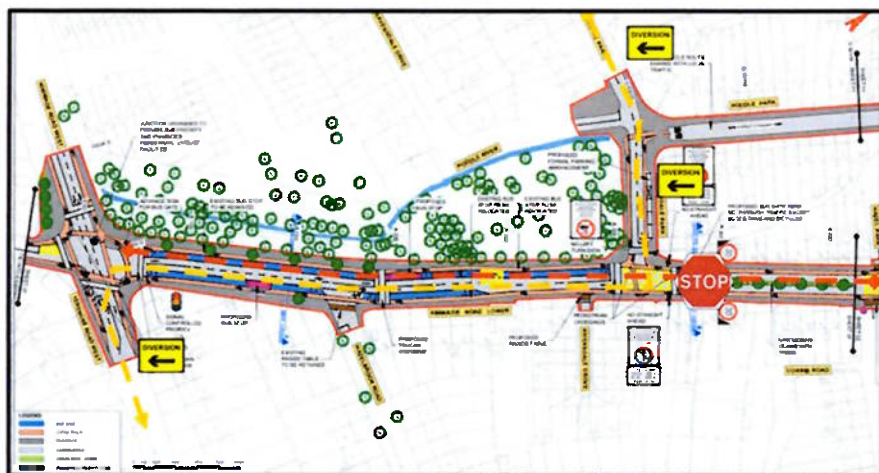


Figure 4: Proposed Bus Gate at Ravensdale Park Road junction with Kimmage Road Lower

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Figure 5: Alternative Route to Mount Argus Church

The works to improve the public transport provision along Kimmage Road Lower will have benefits for residents of the wider city who pass by the Church every day. It is imperative that the church and main car park is accessible at all times during the construction phases to minimise the disruption to those looking to enter the church grounds.

We acknowledge the purpose of Bus Gate in order for both these sections of the proposal to operate successfully.

We would request that the hours of operation the two Bus Gates to the north east are reduced to better acknowledge the busiest hours for traffic in the area and to not be in operation when the Church is in its most intensive use. We request that the hours of operation of both the Bus Gates are amended to the following times:

- 6am to 10am
- 4pm to 8pm

It is also requested that all three Bus Gates are only operational between Monday and Friday.

This amendment would mean that the Bus Gate is operational for the busiest times of the day and week but would not be operational at quieter times of the day when mass and other services would take place.

It is considered that this change would address the concerns of the Church while also allowing the Core Bus Connects Corridor Scheme to achieve its aims of improving bus times to the south of the city.

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**Conclusion**

The benefits of the BusConnects programme are recognised and improved public transport through the area will have benefits for our parishioners and encourage more sustainable modes of transport are used generally.

We have given careful consideration to the proposals and feel that our request to alter the hours of operation of the Bus Gates to better facilitate the Church is a reasonable request.

We respectfully request that our concerns are addressed in the approved scheme should An Bord Pleanála be minded to grant permission.

Yours faithfully,

Brian Coughlan
BA, MSc, MIPI, MRTPI
Virtus

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