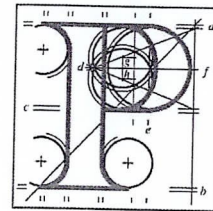


**Our Case Number:** ABP-317660-23



**An  
Bord  
Pleanála**

Stannaway Road Residents  
c/o Cathy Mooney  
73 Stannaway Road  
Dublin 12  
D12A3E6

**Date:** 06 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](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

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

Planning Officer,  
Planning Department,  
Submission online

Date of Submission of Application: 25.07.2023

Planning Application Reference: 317660

Applicant: National Transport Authority (Applicant)

Description of Development: Kimmage to City Centre BusConnect Core Bus Corridor Scheme.

Observer: 28.08.2023

Dear Sirs/Madams

I hereby submit the following observations in respect of the planning application submitted on the 1st August 2023, by National Transport Authority (Applicant), Planning Reference Number 317660.

This submission is on behalf of the residents of Stannaway Road names in Appendix 1.

In light of the below observations I would request An Board Pleanála vigorously vet and challenge the impact of the Kimmage - City Centre bus corridor on the residential area of Stannaway Road.

Please forward future correspondence to Cathy Mooney, 73 Stannaway Road, Dublin 12 D12A3E6.

Payment in the sum of €50 made online.

Yours faithfully,

Stannaway Road Residents.

## **Overview of Observations by Residents of Stannaway Road**

The residents of Stannaway Road are supportive of the Bus Connects scheme. However, we have serious concerns about the potential negative impact on the community and the surrounding area. The main concern centres around the proposed bus gate at the junction of Lower Kimmage Road and Ravensdale Park which will divert traffic from Lower Kimmage Road to the neighbouring residential roads of Cashel Road, Captains Road, and Stannaway Road. Though the proposed bus gate will be timed we believe the impacts will be felt 24 hours a day and will be sustained long term. Cashel Road, Captains Road, and Stannaway Road are narrow, densely populated with two-up-two-down houses, and have on-street parking as the norm. The residents are already dealing with unresolved issues such as rat-running, speeding, non-compliance with heavy goods vehicle (HGV) restrictions, air pollution, and traffic noise/vibrations. We believe that these issues will become significantly worse once the Lower Kimmage Road/Ravensdale Park bus gate becomes active and as the plans currently stand there is no provision to manage the diverted traffic into our community. The new city centre bus route will run just under 50% less frequently than the current no. 83. And the residents are concerned that increased traffic will lead to queuing along Stannaway Road and Sundrive Road that, coupled with the reduction in bus frequency, will result in significantly poorer quality public transport. Despite attempts to engage with Bus Connects, the residents have had no success in resolving their concerns. We believe that the proposal in its current format will place a significant burden on the residents of Stannaway Road. We hope that our observations will lead to improvements in the Bus Connects plans for the Kimmage corridor.

## **Infrastructure Accommodation**

Stannaway Road runs parallel to Lower Kimmage Road and would naturally become a route for traffic to Sundrive shopping centre, Mount Jerome cemetery, the canal, town etc if the proposed bus gate is implemented at the junction of Ravensdale Park and Lower Kimmage Road. However, unlike Lower Kimmage Road, Stannaway Road is not a main road. It consists of a residential community of 240 family homes. The road's infrastructure is not designed to handle an increase in both commercial and commuter traffic. The following aspects should have been considered in the proposal:

- The residential community consists mainly of "two-up two-down" housing.
- Currently Stannaway Road is too narrow for buses and HGVs to pass each other. Buses, HGVs and some LGVs are unable to maintain their lane and oversailing of vehicles is common practice on the road.
- Essential residential on-street parking further narrows the already narrow road, and no alternative parking options exist for the residents.
- Existing unresolved issues with traffic speed, traffic vibrations/volumes, non-compliance with HGV restrictions and rat-running.

The residents are concerned about the capacity of the existing infrastructure to handle additional commuter and commercial traffic. There is no provision in the

current planning to manage diverted traffic to Stannaway Road. Stannaway Road has a ban on HGVs to protect the road, but the residents have observed non-compliance and non-enforcement of this restriction. We believe that this issue will worsen when commercial traffic, such as delivery trucks, redirect to Stannaway Road.

### **Traffic Volumes**

The residents' would like to raise concerns regarding serious increases in traffic volume to Stannaway Road and the surrounding community. Bus Connects indicated in Appendix A6.1 -TIA - Appendix 1 - Transport Modelling Report, Table 5.2 JTC Locations, 11-5 Kimmage Road Lower/Ravensdale Park has 28,364 daily vehicle movements. Therefore there is a significant chance that up to 10.3 million (28364\*365) additional vehicles per year could naturally redirect onto the narrow residential roads of Stannaway Road, Cashel Road and Captains Road. No consideration has been taken in the current submission by Bus Connects to safely manage the diverted traffic flow to our community.

It has been noted that there are traffic management proposals planned for Kimmage-Terenure side of Kimmage Road Lower "The Proposed Scheme includes for localised modifications along Derravaragh Road at the junctions of Corrib Road, Aideen Drive and Neagh Road, and Aideen Avenue and Mount Tallant Avenue. These localised modifications are required to control the flow of traffic and prevent rat-running during the operation of the Bus Gates" Non Technical Summary Page 14. However no traffic modifications were proposed for the Kimmage-Crumlin side of Kimmage Road Lower other than blocking Poddle Park. The residents believe that Stannaway Road and the surrounding residential roads should be included in the planning. The community falls within the 1km impact zone of the proposed bus gate and is equidistant from the proposed bus gate and bus lane as the area of Kimmage-Terenure benefits from traffic calming. The residents of Stannaway Road believe given the volume of diverted traffic we are deserving of robust and detailed traffic management.

It has been observed in the current plans a cycle lane is proposed for Lower Kimmage Road. The blocking off of Poddle Park to facilitate an additional cycle-lane parallel to the Kimmage Road Lower cycle lane appears to be redundant. If Poddle Park were left open it would retain the current route for traffic accessing the Sundrive area, Mount Jerome, canal, town, etc.

### **Rat-Running**

In Chapter 04 - Description of the Proposed Scheme, page 4 Cashel Road, Captains Road, and Stannaway Road are not included in the traffic management measures nor are the adjoining residential streets. Unfortunately there are currently no plans to prevent through-traffic or 'rat-running' within the Kimmage-Crumlin community as a result of the bus gate placed at Ravensdale Park and Lower Kimmage Road.

Rat-running by cars onto quiet residential roads such as Kilfenora Road, Clonfert Road, Bangor Road, Ferns Road and Durrow Road would have a negative impact on the larger community. These roads are easily accessible by frustrated drivers from Stannaway Road. Most concerning is that these roads are social spaces where children play, kick footballs and cycle bikes. Such unrestricted, unmanaged rat-running would put the residents' overall safety at risk as well as erode the sense of community.

Concerns about rat-running have already led to the closure of Ferns Road to through traffic from Stannaway Road and Sundrive Road between 7-10 am daily. However, the residents have noted that the observation and enforcement of the Ferns Road traffic restriction has been completely unsuccessful.

However Corrib Road, Aideen Drive, Neagh Road, Aideen Avenue and Mount Tallant Avenue have had rat-running and traffic management proposed by Bus Connect in the current plans. Stannaway Road and the surrounding residential roads, which are equidistant from the bus lane/gate as the aforementioned roads, have not been included in this planning and the residents believe the community would greatly benefit from similar traffic control planning. Please note the residents did reach out multiple times to Bus Connects to ensure detailed and focused traffic plans were put in place but unfortunately we were unsuccessful.

### **Speeding**

The straight 1.5km length of Stannaway Road, combined with easily avoidable gapped speed ramps, has unfortunately encouraged speeding. Although residential on-street parking has helped manage speeding to some extent at the Eamonn Ceannt park end of Stannaway Road, the current levels of speeding on the road remain unsustainable, and local residents have reported concerns. The plan, in its current form, has no provision to manage the increased speeding risk to the Stannaway Road residential community as a result of the diverted traffic from the bus gate at Ravendale and Lower Kimmage Road.

The residents have observed that if all gapped speed ramps could be replaced with solid ramps, which would be in keeping with other local speed ramps, this would significantly aid in traffic calming. A request for the replacement of the ramps was made by the residents at the May 2021 meeting with Bus Connects but was rejected by Bus Connects because changing the ramps could potentially negatively impact the new bus route. However solid ramps already exist within the community at the top of Stannaway Road at Lorcan O'Toole Park and along Cashel Road, both of which are part of the existing No. 83 bus and pose no detrimental impact on the buses. The observation is that the potential impact of solid ramps on the buses would be minor compared to the benefits to the residents of Stannaway Road. Plus, in addition to solid ramps, raised platforms at junctions and increased pedestrian crossings would significantly benefit the community. The residents hope the requests

are looked favourable upon and can be easily incorporated into planning for Stannaway Road by Bus Connects.

### **Noise & Vibration**

The residents are worried about significant noise and vibrations from the redirected traffic onto Stannaway Road 365 days a year. As previously mentioned up to approximately 10.3 million vehicles per year would flow onto the narrow residential roads of Cashel Road, Captain's Road and Stannaway Road. The current plan, by excluding Stannaway Road, does not offer any solution to address these issues. The non-compliance and non-enforcement of HGV restrictions and speeding exacerbate the noise and vibration problems.

### **Air Pollution**

Diverted traffic onto the residential road of Stannaway Road raises significant concerns about the impact on air quality for the residents living in the area. As traffic increases on these roads, so does the potential for increased air pollution and its negative effects on health. The up to 10.3 million additional vehicles will not only lead to a larger number of moving traffic but will also lead to more congestion, idling vehicles, and stop-and-go traffic, further exacerbating air pollution levels and greenhouse gases. Redirected traffic on to Stannaway Road as a result of the bus gate at Ravendale Park and Kimmage Road Lower will disproportionately affect the vulnerable and those with pre-existing respiratory conditions, who are more susceptible to the effects of poor air quality. The neighbouring streets will also be impacted by pollution caused by rat-running. As is well known the prolonged exposure to air pollution can result in long-term health issues and reduce the overall quality of life.

### **Reduced Bus Performance for Community**

Stannaway Road residents and the surrounding community are currently served by the high frequency no. 83 which runs every 12 mins as well as the less frequent no. 18. To the disappointment of the residents no. 18 route is not being replaced along Stannaway Road.

The no. 83 city centre route will be replaced with no. 82 which will run every 20 minutes during the day reducing the community's city centre bus service by just under 50%. The no. 82 will run every 30 minutes at evenings and weekends therefore if one off-peak bus is cancelled there could be up to an hour wait for a bus. Not only will the residents see a reduction in the volume of public transport but the flow of diverted traffic onto Stannaway Road will have a significant negative impact on the new bus route. The route will experience slow progress along Stannaway Road and Sundrive Road. This will lead to extended journey times and decreased journey reliability, especially during peak travel times. The residents have observed that this situation contradicts the objectives of the program, which aims to enhance the capacity and potential of the public transport system by improving bus speeds,

reliability, and punctuality through the provision of bus lanes and other measures to prioritise bus movement over general traffic movements. There is no provision in the current plan to prioritise the new no. 82 route along Stannaway Road and Sundrive Road in a similar manner to the proposed bus lane along Kimmage Road Lower. We are unsure why the new no. 82 route is not given the same status for priority as other bus routes in line with Bus Connects' aims and objectives.

### **Public Consultation**

Three rounds of non-statutory public consultation took place, but the Stannaway Road residents were excluded from the process. The first round of plans did not include the bus gate at Ravensdale Park and Kimmage Road Lower. And, as the plans changed, in subsequent rounds of public consultation, the Stannaway Road residents were not included nor consulted. This exclusion meant residents could not raise local concerns and propose mitigating strategies during the planning stages. The residents became aware of the proposed traffic redirection on to Stannaway Road only through word of mouth after the third round of public consultation was closed. No detailed plans about the bus gate were made available to the residents of Stannaway Road even after repeated requests for plans from Bus Connects until Nov 2022.

Some residents reached out to Bus Connects, via public representatives, and an online meeting took place in May 2021. A limited number of residents attended where concerns were raised about the impact of the proposed bus gate at Ravensdale Park and Lower Kimmage Road. An additional meeting took place on 4 Oct 2022. Both meetings resulted in no changes of Bus Connects plans and did not address the residents' concerns.

To keep things moving an alternative plan was suggested by the residents in Dec 2022. In Jan 2023, the proposal was rejected by Bus Connects, stating that any proposed enhancements and traffic calming for Stannaway Road were not part of the scheme - "On the basis that the mitigation measures are not required under the Scheme, any proposed urban realm enhancements and traffic calming for Stannaway Road are not included as part of the proposed Scheme and would be delivered as a separate NTA funded Active travel scheme in advance of the proposed Kimmage to City Centre CBC Scheme." Appendix 2.

To the great disappointment of the residents no further engagement by Bus Connects was forthcoming. Additionally no traffic calming was proposed nor delivered by NTA funded Active travel scheme in advance of the proposal of the Kimmage to City Centre Scheme.

### **Alternative Proposals**

The residents of Stannaway Road understand the importance and objectives of the proposed Kimmage - City Centre route. In an effort to develop a positive outcome a

number of residents attempted to work with Bus Connect after the public consultation was closed and through public representatives in advance of publication of planning to achieve a positive outcome for the community and Bus Connects. The residents kept the following criteria in mind:

- Ensuring the success of Bus Connects' new routes - including a new route along Cashel Road and Stannaway Road
- Reducing the impact on residential areas
- Deprioritizing car traffic

Online meetings with Bus Connects in May 2021 and Oct 2022 did not address any of the concerns consistently raised by the Stannaway Road residents. In December 2022 a provisional idea was suggested to Bus Connects to place a bus gate on Stannaway Road to reduce traffic flow and transform Stannaway Road and its associated roads into quiet streets, prioritising buses and people while deprioritizing commuter and commercial traffic. The proposal also included very simply and easily deliverable ideas such as:

- Keeping Poddle Park open
- Updating existing gapped ramps to full ramps along Stannaway Road
- Increasing the number of pedestrian crossings
- Creating raised platforms and pedestrian crossings at junctions
- Implementing enforcement plans for HGVs and speed limits
- Enforcement of existing traffic restrictions i.e. Ferns road restrictions
- Making roads no-through roads and one-way to prevent rat-running and protect children and vulnerable people

The residents are not urban planners but were very happy to collaborate and work with Bus Connects to try to achieve the best results. However, all suggestions were considered out of scope by Bus Connects see Appendix 2 and no traffic management plan has been put in place.

## **Conclusion**

The residents of Stannaway Road will pay all the cost and see none of the benefits of the proposed Kimmage-City Centre Bus Corridor. The negative impacts on Stannaway Road are unnecessarily disproportionate:

- Up to 10.3 million additional vehicles (including HGV/LGV) on narrow residential road
- The traffic will bring noise, vibrations, blocked exit/entrances to homes, rat-running, speeding, pollution, increased noise and vibration, reduced safety for children and the vulnerable, removal of safe residential streets and increased stress
- Significant decrease in bus services because of the reduction in the frequency of the city centre route coupled with the impact of the increased traffic
- Loss of local businesses and services placing additional burden on the local community

And all concerns will be exacerbated when the three local Bus Connect plans come online: Kimmage to City Centre, Templeogue / Rathfarnham to City Centre and



Tallaght / Clondalkin to City Centre. Stannaway Road will become one of the last remaining easily accessible straight driving roads in the area. This will by extension put the broader Kimmage-Crumlin community at risk from the unmanaged impacts of traffic. We attempted to engage and work with Bus Connections but unfortunately were unsuccessful. However other areas within the impact zone of the bus corridor have traffic control planning proposed. And as previously stated no traffic calming was proposed nor delivered by NTA funded Active travel scheme in advance of the proposal of the Kimmage to City Centre Scheme. We believe it is crucial to prioritise the health and well-being of residents of the Kimmage-Crumlin community. We encourage the Inspector to visit Stannaway Road to see the risks posed to residents. We hope careful consideration is given to the adverse effects on the community and we are happy to engage to bring about a positive result for all involved.

## Appendix 1

Bevin Herbert 3 Stannaway Road
Erin Vause & David Neylon 20 Stannaway Road
Michelle Bourke-Girgis 26 Stannaway Road
Patrick and Linda Brennan 35 Stannaway Road
Ann Spain 39 Stannaway Road
Trish McPhee 57 Stannaway Road
Jennifer Walsh 64 Stannaway Road
Seamus Donaghy 71 Stannaway Road
Cathy Mooney 73 Stannaway Road
John O'Mahony & Victoria Romero 75 Stannaway Road
Sharon Davis 81 Stannaway Road
Bill Aspil & Olive Kelly 97 A Stannaway Road
Robert Hoey 105 Stannaway Road
106 Martin Deering 106 Stannaway Road
Gabrielle Chapman 108 Stannaway Road
Yvonne Kelly 110 Stannaway Road
Sandra McKeever 112 Stannaway Road
Audrey Moran- 115 Stannaway Road
Colm O'Brien 116 Stannaway Road
Jim Donohoe 135 Stannaway Road
Catherine Di Tofano 137 Stannaway Road
Dympna Harte 158 Stannaway Road
Peggy Dent 177 Stannaway Road
Peter Clohessy 180 Stannaway Road
Harry Weir 181 Stannaway Road
Bernadette Carroll 192 Stannaway Road
Liz O'Reilly 199 Stannaway Road
Joan Doyle 202 Stannaway Road
Lynn, Clare, David Perry 218 Stannaway Road
Rob Smith 244 Stannaway Road

## **Appendix 2**

----- Forwarded message -----

From: BusConnects Core Bus Corridor <cbc@busconnects.ie>

Date: Mon, 23 Jan 2023 at 10:55

Subject: RE: BusConnects Dublin

Hi ----

The NTA BusConnects team are currently finalising the preliminary design of the Kimmage to City Centre Core Bus Corridor (CBC) Scheme. In addition, the Environmental Impact Assessment (EIA) Report, inclusive of traffic impact analyses is being finalised for the Scheme. Once the Scheme documentation is finalised, these reports will be the basis for our formal statutory planning application to An Bord Pleanála (ABP), together with the Compulsory Purchase Order Schedules and Maps in approximately March this year. The proposed design includes a bus gate on Lower Kimmage Road (LKR) at the junction of Ravensdale Park as shown on the preferred route map brochures within the suite of the documentation prepared for the second round of public consultation in March 2020 and the third round of public consultation in Nov 2020. The BusConnects team analysed multiple options per specific sections of the Scheme to meet the objectives of the Schemes. The preliminary design for the Scheme does not include proposals for the provision of bus gates on Stannaway Road.

As previously mentioned, while our EIA and Transport Impact Assessment (TIA) is being finalised, the EIA/TIA assessment is indicating that impacts for Stannaway Road do not exceed any thresholds considered within the EIAR where mitigation would be required. On the basis that the mitigation measures are not required under the Scheme, any proposed urban realm enhancements and traffic calming for Stannaway Road are not included as part of the proposed Scheme and would be delivered as a separate NTA funded Active travel scheme in advance of the proposed Kimmage to City Centre CBC Scheme.

Kind regards,

BusConnects Team  
National Transport Authority