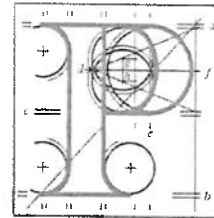


Our Case Number: ABP-317660-23



**An
Bord
Pleanála**

Cllr. Anne Feeney
Members Room
City Hall
Dame Street
Dublin 2

Date: 02 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

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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Glaao Áitiúil	LoCall	1800 275 175
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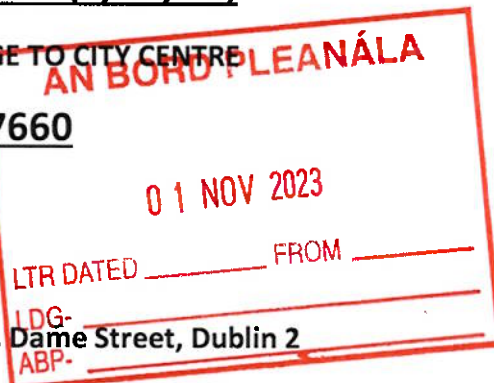
64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

OBSERVATION TO AN BORD PLEANÁLA (1/11/23)

RE: BUS CORRIDOR - KIMMAGE TO CITY CENTRE

APPLICATION: 317660

From: Councillor Anne Feeney
Members Room, City Hall,
Anne.feeney@dublincity.ie



I am a Dublin City Councillor for the **Kimmage Rathmines Local Electoral Area** which is **impacted by Kimmage to City Centre Bus Corridor**. I am making this submission both as a public representative and also in my own capacity as a local resident living close to the KCR junction.

I support the development of more user friendly and environmentally sensitive transport solutions including cycling, Luas, Metro and low emission buses together with low emission cars and other low emission vehicles. I also support decision making based on evidence and in this case I believe more evidence needs to be provided in relation to comprehensive traffic modelling for the proposed route and also the diverted traffic routes.

While this submission relates to the Kimmage to City Centre Bus Corridor, it is my view that it **should be considered in conjunction with the Templeogue/Rathfarnham Bus Corridor and the Walkinstown to city centre Bus Corridor**. These applications have implications for local residential areas, cyclists, traffic flows, air quality and environmental impact. The knock-on impact of the three bus corridors need to be evaluated collectively as well as individually if we are to implement these major infrastructure changes which benefit potentially benefit public transport (if there are a significant number of new buses projected for each route). The impact for urban villages, diverted traffic onto residential roads and pedestrian and access for local residents needs to more fully understood.

The following should, in my view form part of the decision process:

- **Best practice design hierarchy** principles for transport and active travel strategies
 - o **Pedestrians** – safe for walking and access to frequent public transport
 - o **Cyclists** – continuous safe cycling lanes; most direct routes
 - o **Public Transport** – frequent services; adequate capacity; accessible for all
 - o **Private cars/vehicles** – low emissions and secondary to other transport options
- **Dublin City Council's development plan** and emphasis on development of urban villages
- **Submissions from local residents, resident associations, community groups, businesses and other relevant stakeholders.**
- **NTA's very limited projection for increased number of buses** for future demand.
- **Frequency and accessibility to buses/public transport** should be key rather than speed to destination (NTA's own admission is for modest time saving on this Bus Corridor).
- **Volume of HGVs and cars diverted onto narrow residential side roads due to Bus Gates** needs to be critically analysed in terms of environmental impact and congestion.

- **Local access for residents and small businesses (e.g. dentists, doctors, schools, Gardai, etc.) within the bus gate confines and also on roads with more diverted traffic.**
- **Capacity for An Garda Siochana to enforce banned turns**
-

General Observations:

I fully appreciate the need for a greatly improved public transport system to better serve the people who live, work and visit Dublin. The Active Travel programme being progressed by Dublin City Council is part of this, as are Bus Connects, Luas, Dart and Metro developments. However, I have reservations about the applications for some of the Bus Corridor proposals and in this case the Kimmage to City Centre one. Some aspects of this application are not sensitive to a more comprehensive and multi-stakeholder approach to urban planning, particularly when there will be:

- **No appreciable increase in buses on the route**
- **No significant reduction in time from start to city centre**
- **Insufficient design for continuous safe cycling route.** The NTA have **proposed a diverted route via Poddle Park, Bangor Road and Mount Argus** which is longer and so risks not being followed by cyclists.
- **Significant negative impact for residential roads** by placing Bus Gates on main arterial routes to the city centre. **Dublin City Council traffic officials have confirmed to me that the current Priority Bus Traffic lights on Templeogue Road and at the three other locations in the city work very effectively in terms of ease of flow for buses. So why introduce Bus Gates which will clearly back up traffic and cause unnecessary congestion on adjacent roads.** No clear up to date data of combined traffic impact (different times of day) for residential roads that have to absorb traffic as a result of the proposed Bus Gates.
- **Significant construction cost and cost to businesses on Lower Kimmage Road and Sundrive junction in particular.**

Specific Observations for locations on the proposed Bus Corridor:

Bus Gate 1 at Lower Kimmage Road (Ravensdale Park junction)

- 7 days a week and from 6am-10am and 4pm-8pm
- a passage open to all traffic North/South bound on Lower Kimmage Road during the following hours of 8pm-6am/10am-4pm

The impact of this bus gate is that it is extremely likely that traffic will back up at Fortfield Road during the bus gate hours of operation and possibly back up the rest of Fortfield Road and Wainsfort Road which will delay the new 54A and impact the forecasted time saving by the NTA.

The bus gates will also have the impact of diverting extra traffic from Fortfield Road and Kimmage Road West trying to move east or into the city or into Terenure. **This will compound the already backed up traffic on Terenure Road West, a narrow (two lane) residential but main road with a junior school, nursing home and Garda station. Congestion may impede Garda, Ambulance and other emergency services.** Also, there will be no dedicated lane to make a right turn at the KCR into Terenure Road West. This will leave an already unsafe junction even more dangerous for all users (pedestrians, cyclists and motorists) and is likely to cause traffic delays.

The congestion on Terenure Road West will also impede journey times for the 15A and 17(S2) on these key morning services to the city and to UCD. There will also be an impact for local roads of Lavarna and Greenlea as some traffic will divert.

- **Bus Gate 2 – Lower Kimmage Road (Mount Jerome Bus Gate)**

- o 24/7

Access to Mount Argus Church/Mount Jerome/Our Lady's Hospice, Harold's Cross will be impacted by Bus Gate 2 between 10am and 4pm. It will not be possible to access these locations via Lower Kimmage Road unless you make your way eastward to Harold's Cross Road.

- **Bus Gate 3 – Harold's Cross Park (Lower Kimmage Road side)**

- o 7 days a week
- o Inbound 6am-10am
- o Outbound 24/7

- **Other impacted roads** with extra traffic as a result of the Bus Gates are: Clareville Road, Larkfield Ave, Larkfield Park, Sundrive Road, Stannaway Road.

- **5-way Kenilworth junction**

A new bus gate is planned which will stop traffic driving from Kenilworth Square into the junction. There will also be a new permitted right turn heading out of the city from Harold's Cross Road towards Kenilworth Park. Again, however, traffic turning right and outbound traffic heading to Terenure will effectively share the same traffic lane.

- **Cycle Lanes**

- o Dedicated cycle lane from KCR to the canal (except for a short stretch along side the left at the shops at Sundrive junction)
- o Proposed off road cycle option via Poddle Park, Blarney Park and Mount Argus View rejoining the main road near Mount Argus Monastery

- **Harold's Cross Bridge** – no right hand turn

Conclusion:

In conclusion, Bus Corridors with no appreciable improvement in bus numbers are an over engineered and costly approach for this route for public transport from Kimmage to city centre. There is inadequate consideration of cycling requirements in terms of direct and continuous safe cycling lanes; the impact for pedestrians and small businesses; the residential roads impacted by severity of Bus Gates; access for local residents who will have to make long diverted journeys (more emissions) to reach their homes due to banned turns and congestion on otherwise quiet roads.

This application is based on the needs of buses and not necessarily their users along the routes. There is no medium term increase in buses or reduction of travel time and this can be confirmed with the NTA.

The introduction of Bus Gates on Lower Kimmage Road are unnecessary given that Dublin City Council's 'Priority Traffic Lights' are a proven solution to ease flow of buses on narrow urban roads and have a much less adverse impact on adjacent residential roads.

What is needed right now are more buses, more priority bus lights, more continuous and segregated cycling and more pedestrian oriented traffic light junctions.

Bus Corridors make sense in some areas with wide road networks into the city. Where this is not the case, the Bus Corridor proposals must adapt and take cognisance of different needs en route via small urban villages and residential areas and they must provide data to support the case for diverting traffic onto already congested roads and narrow residential roads. There has to be an approach that makes things better, not just for bus users but for the neighbourhoods that buses serve and go through.

I appreciate you considering the issues I have raised and I trust that An Bord Pleanála will take on board all of the submissions made in relation to this application in arriving at the right planning decision for commuters, residents, businesses and local communities. I would also ask that an oral hearing will be undertaken for each of these major infrastructure Bus Corridors.

Councillor Anne Feeney

Dublin City Council - Kimmage Rathmines LEA