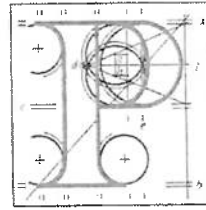


Our Case Number: ABP-317660-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Cllr. Carolyn Moore
c/o Richard O'Carroll Room
City Hall
Dublin 2

Date: 20 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.

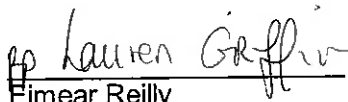
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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

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Councillor Carolyn Moore
C/O Richard O'Carroll Room,
City Hall,
Dublin 2.
December 8th, 2023

Submission to An Bord Pleanála

Re: Application number 317660, BusConnects Kimmage to City Centre Corridor

To whom it may concern,

As the Green Party's Councillor for Kimmage-Rathmines I am writing to convey my observations on the National Transport Authority's (NTA) application for the **Kimmage to City Centre Bus Corridor (ABP Case reference: HA29N.317660)**. Throughout my involvement in various stages of consultation on this proposal I have broadly supported BusConnects, and welcomed the ambition to radically upgrade our public transport system. As our city recalibrates in the aftermath of the Covid crisis, and adjusts to changes in work and commuting habits, while continuing to work towards adaptation and mitigation of a worsening climate emergency, we cannot accept a return to a gridlocked city with chronic car-dependency, ever-worsening air quality, and the ongoing loss of biodiversity.

The imperative to offer safe, sustainable and low-carbon transport options has never been more urgent and I have always welcomed that the stated ambition of BusConnects goes beyond the provision of public transport to providing a more holistic sustainable transport solution, namely:

- ❖ *To 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.*
- ❖ *To provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.*

For this reason, I believe BusConnects will be an integral part of the transport solution for Dublin, but it has the potential to be so much more – it offers an opportunity to reimagine our city and plan for a future where Dublin is a connected, climate-resilient capital where streets are for people, private car ownership is an option not a necessity, and people can confidently choose the most efficient mode of transport for the journey they need to make, instead of feeling the private car is their sole option for every single journey.

The NTA also affirms that the Proposed Scheme is a key measure that delivers on commitments within the *National Development Plan (2021-2030)*, the *Transport Strategy for the Greater Dublin Area (2022-2042)*, the *Climate Action Plan (2023)*, and the *National Planning Framework 2040*. While these are critically important roadmaps to our low carbon future, it is vital too that BusConnects supports the delivery of the objectives laid out in the Dublin City Development Plan, specifically around the sustainable development of our city, and that it supports the modal shift necessary to reduce our city's transport emissions.

If we are to achieve that transition, it is essential that we bring people and communities with us, and I recognise that the NTA has listened to the public's concerns in previous rounds of consultations, and this on-going engagement is reflected in the proposal which is now before the Board for consideration. However, I feel it is important to acknowledge the limitations due to Covid of the consultation which took place in 2020, entirely online, and therefore potentially excluding some demographics, who - at this critical juncture - feel they haven't been adequately engaged with and do not have a full understanding of the implications this proposal will have on how they travel through and around the city, by whatever mode they currently use, including the existing bus network.

Perceptions about the quality and inclusiveness of the consultation which took place in 2020, combined with a lack of clear, accessible information from the NTA around specific elements of this current proposal, have contributed to a climate of fear and anxiety about the impacts of its implementation. Along with other public representatives, I had called on the NTA to make available combined traffic modeling showing the cumulative impact of the multiple corridors which are proposed for the Kimmage Rathmines area (Corridors 8, 9, 10, 11 and 12, to accommodate spines A, D and F) to allay some of these fears, and furthermore it was requested that these corridors would be the subject of a joint application to An Bord Pleanála so that the Board could consider that cumulative impact on the environment, planning and sustainable development, of multiple routes converging in the area.

I ask the Board to give due consideration to the submissions and concerns of communities who have had to grapple with and decipher the vast tracts of complex documentation which accompanied this application. I would also ask the Board to consider the following observations and ensure that the Kimmage to City Centre corridor optimises its potential to deliver positive outcomes for the environment, the public realm and the quality of life of residents within the Kimmage-Rathmines area. I ask finally that in considering this application, An Bord Pleanála might recommend further revisions to the proposed scheme, as outlined below, to ensure that it delivers the future-proofed, holistic sustainable transport solution that Dublin needs.

PLACEMAKING

While planned improvements to the public realm at several key junctions and the urban village of Kimmage are welcome, it is essential that every opportunity is taken to improve the public realm and - in line with the Dublin City Development Plan - make our villages and communities liveable, accessible, sustainable, and walkable/wheelable places. The potential for BusConnects to deliver significant enhancement to the public realm is huge, and far from being merely a tool to mitigate the impacts of the the new corridor, every opportunity should be taken to put placemaking at the forefront of design considerations in order to support good planning and sustainable development in the impacted communities.

Optimising this potential would not just signify a commitment to sustainable development, it would also lead to better outcomes for public transport use. If people can't walk comfortably to, and wait comfortably at a bus stop, they won't use the bus, and likewise an attractive, well maintained and safe public realm encourages walking and active travel. For this reason, bus shelter designs must be safe, well lit, age-friendly and accessible; they should be safe for people with vision impairment to access and use, and designs should generally minimise the potential for conflict between pedestrians and cyclists.

Furthermore, stops and shelters should be attractive and sustainable in their own right, and the NTA should look to 'green roof' design options in use across Europe to enhance biodiversity and contribute to an overall greening of the streetscapes.

While recognising that the provision of efficient, regular and reliable public transport is a first step in enabling people to opt-out of private car ownership, it is essential that such a major overhaul of Dublin's primary public transport system aligns with the objectives of the city's Development Plan. To this end, public realm improvements should include widening footpaths; providing civic spaces, greening, rain gardens and biodiverse landscaping; and offer continuous, safe and segregated cycling infrastructure.

We must take this opportunity to allocate the maximum space possible to people; to design our public spaces inclusively and with The Hierarchy of the Street in mind (see below); and to pave the way for a sustainable future where our streets and urban villages are not dominated by cars. Disabled parking should be prioritised over pay-and-display in all on-street parking plans, and age-friendly parking bays should be introduced for those with reduced mobility or no access to alternative modes of transport.



To take every opportunity to enhance the public realm in line with our city's sustainable development objectives, the NTA should:

- **Identify further opportunities to improve the public realm in Kimmage** - specifically at the crossroads of Lower Kimmage Road and Sundrive Road, identified as the village centre. As outlined in the application, public realm enhancements here will consist of roughly 15 new street trees and a rest area, however it represents a downgrading of what was presented in 2020, with no proposed landscaping or greening. Furthermore the provision of three parking spaces at on the northern side of the junction (outside 161, 163 and 165 Kimmage Road Lower) does not take account of a build out for a proposed seating area recently completed by Dublin City Council in collaboration with Kimmage business owners, and the retained advisory cycle lane outside 151 to 159 does not take account of the dangerous and consistent illegal parking on

the footpath at this location, which degrades the public realm and presents a clear danger to both pedestrians and cyclists.

- Furthermore the location of several of the proposed new trees is adjacent to proposed new formal parking spaces, yet it is not clear if the trees are to be in the form of tree pits to support mixed planting and sustainable urban drainage, or if they will take space from the existing footpath width. I would propose they should be provided in tree pits in lieu of car parking spaces so the footpaths remain clear and the planting can maximise the potential and biodiversity of all proposed greening.

PEDESTRIAN IMPROVEMENTS

BusConnects has never been a single-focus transport proposal, and I'm glad that the opportunity to reallocate space to walking and cycling is being taken with many of the proposed corridors. However, the NTA must acknowledge the degree to which school drop offs and pick ups contribute to the traffic levels on our roads and ensure that safe walking, scooting and cycling along routes to schools can be undertaken.

Dublin City Council has just concluded a public consultation for a school zone (front of school works) for Harold's Cross Educate Together and St Clare's on Harold's Cross Road and it is essential that the benefits of these works, if progressed as proposed, are maintained in the context of BusConnects. Equally, all efforts should be made to ensure those accessing Scoil Mológa and Harold's Cross National school can do so safely and via sustainable transport modes.

Furthermore, if BusConnects is to create a healthier and safer environment for **all** users of our footpaths (hereafter referred to as 'pedestrians') then every opportunity must be taken to prioritise pedestrians and signal their priority with continuous footpaths across side roads; the addition of pedestrian crossings where desire lines exist; and wider footpaths and traffic calming measures where needed. The design and timings of pedestrian crossings should ensure that people of all ages and abilities can safely cross the road, and crossings should prioritise pedestrian movement over other forms of transport.

For planning reasons, all designs for pedestrian infrastructure must adhere to both the hierarchy of street design and the Design Manual for Urban Roads and Streets (DMURS). Proper planning standards indicate that footpaths should be a minimum width of 2m, and to ensure the sustainability of the project and optimise the provision of safe, DMURS- and planning-compliant pedestrian improvements, the NTA should:

- **Ensure that pedestrians are given clear and visible priority along the corridor with the provision of continuous footpaths rather than raised tables on smaller / side roads along the Lower Kimmage Road.** Not only will this make crossing these side roads safer and more manageable for wheelchairs users, pedestrians with mobility challenges, or people pushing buggies by providing a level surface on which to cross, it also creates a more visually cohesive public realm, and one that gives clear priority to pedestrians over vehicles at minor junctions. This approach should be considered over raised tables at eg Hazelbrook Road, Riversdale Grove, Hazel Park, Kimmage Court, LeVere Terrace, Armstrong Street and Greenmount Avenue.

- **Assess the turning radii on many of these side road junctions** and if necessary reduce the radii and tighten the bend to slow down turning vehicles and protect pedestrians and cyclists using the junctions.
- **Ensure consistency and continuity of street design:** While raised continuous footpaths would be preferable along the route, it is not clear why there are no raised tables proposed for the entrances to eg: Aideen Avenue, Kimmage Grove, St Martin's Park, Priory Road, Westfield Road and Casimir Road when these are being retained or proposed for every other side road off the main corridor south of the Sundrive crossroads.
- **Ensure the future sustainability of communities by identifying and delivering safe routes to schools,** taking into account the operational hours of bus gates falling outside of school pickup times, and the failure to provide segregated cycling infrastructure.
- **Ensure speed limits are appropriate for road use, and speed limits are adequately enforced.** While the 30 km per hour speed limit is welcome, it is also pointless without enforcement.
- **Ensure all bus stop / bus shelter designs are safe to access, particularly for the visually impaired.**
- **Include an additional pedestrian crossing between Kimmage Court / Tesco and Sundrive Cross,** as the distance from there to Sundrive Cross is significant from a pedestrian perspective.
- **Provide for additional pedestrian safety measures at Kimmage Grove junction** - the only point of access for the busy and growing Larkview FC.
- **Consider an additional pedestrian crossing between Kenilworth Park and Westfield Road** to assist residents and those exiting the bus to safely access the Mill Apartments, Mount Argus Church, Scout Hall, and St. Gladys Nursing Home.
- **Ensure that pedestrian infrastructure and prioritisation is delivered on adjacent bus routes,** eg under the redesigned bus network, a large section of Harold's Cross Road (from the Terenure crossroads to the top of the park) will not be developed to accommodate a 'spine' and is therefore not included in either this proposal, or the Rathfarnham/Templeogue to city centre proposal, but it will connect corridors 11 and 12 and it will continue to accommodate key bus routes. Therefore, to ensure a cohesive approach to sustainable development in the area, it should also benefit from improved pedestrian safety and prioritisation, including adequate crossings and the provision of continuous footpaths across minor junctions / side roads.

CYCLING IMPROVEMENTS

Cycling infrastructure should be 24 hour, continuous, and segregated as much as possible, with careful consideration given to the interplay of bus stops and cycle tracks in order to minimise potential conflicts between passengers and cyclists.

Likewise the integration of disability access parking spaces should provide no opportunity for users of those spaces to find themselves navigating a cycle track as they exit or enter their vehicle, and every

opportunity should be taken to reduce potential conflict generally between cyclists and pedestrians and cyclists and vehicles, with DMURS-compliant designs that respect the Hierarchy of the Street.

It is clear from this proposal that, had the DMURS been rigidly adhered to, the NTA would not have ended up with this particular scheme and the deviations therein, which therefore constitute improper planning. Optimum road allocation is illustrated in cross section drawings, and deviations from standards seem to occur only in the provision of walking or cycling infrastructure, which runs contrary to the aforementioned hierarchy - for example, in the village centre of Kimmage, the provision of formalised car parking has taken priority over even advisory cycle infrastructure, leaving a gap in the cycling network along a route that services several schools in the area. While the scheme increases the total cycling facilities from 2.8 km to 4 km, 2 km of this consists of retained existing advisory cycles lanes.

In this regard, the design cannot be seen to be consistent with the stated objective to *“enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable”*, and should be improved by upgrading advisory cycle lanes to segregated cycle tracks that would normalise and regularise cycling as a safe and efficient mode of transport to get around the community and enjoy the benefits of the newly filtered permeability of some roads. Recent census results show the ‘Terenure A’ electoral division, which lies between Lower Kimmage Road and Harold’s Cross Road, has the highest share of people who, when asked in Census 2022 *“How do you usually travel to work, school, college or childcare?”* responded *“Bicycle”*: about 20 percent of respondents in this area.

We cannot miss the opportunity with this major reconfiguration of roads and transport routes in this area to cater to the needs of the existing population and make cycling a more attractive option for a wider cohort within this community, and this BusConnects proposal falls short in that regard. While ‘quiet way’ routes have been provided, and the provision of additional space for cyclists crossing Emmet Bridge is welcome, cycling infrastructure elsewhere on this short route is low quality, intermittent and puts cyclists into conflict with traffic and parked cars at regular junctures.

Furthermore, throughout the scheme we see variations on the proposed widths of the cycle Tracks and there has been a failure to ensure compliance with Universal Design principles which would provide access for disabled cycling and 'non-standard' or adapted cycles. The Cycle Design Manual permits 1.5m as an ‘absolute minimum’ where cycle numbers are less than 300 per hour, and states that designers should look to provide the widest possible width between 1.5m and 2m. However, per the cross-sections provided, cycle tracks are less than 2m, and even less than 1.5m, at a number of points, including:

- Lower Kimmage Road: cross-section C-C 1.5m cycle lane
- cross-section F-F 1.2m cycle lane
- cross-section G-G 1.2m cycle lane
- Harold’s Cross Road: cross-section I-I 1.5m and 1.5m-2m cycle tracks
- cross-section J-J 1.5m cycle tracks
- cross-section K-K and L-L 1.5m cycle tracks

It’s not clear if the segregation kerb itself is accounted for in these widths, and it should be noted that in many cases there is space to increase the width of the cycle tracks. The NTA should seek to achieve the maximum widths possible.

Again, the NTA must also acknowledge the degree to which school drop offs and pick ups contribute to the traffic levels on our roads and ensure that safe cycling along routes to schools is facilitated. For optimum buy-in from more vulnerable road users, and to maximise the opportunity to create safe routes to school, greater consideration should be given to the provision of cycle lanes that accommodate two abreast cycling or safe overtaking (ie 2m).

Finally, where road sharing is necessary, the 30 km per hour speed limit should be rigorously enforced.

For proper planning, and to ensure the sustainability of the development and optimise the provision of safe, DMURS-compliant cycling infrastructure, the NTA should:

- **Revisit the designs for the provision of cycling infrastructure along this route.** Provision of segregated cycle tracks along Harold's Cross Road are welcome, but as outlined above, on the Lower Kimmage Road advisory cycle lanes should be upgraded, continuity of access to cycle lanes should be ensured, and cycle tracks should be an appropriate minimum width. For continuity and cohesion of design, the provision of cycling infrastructure should continue along the section of Harold's Cross Road which does not constitute part of either this proposal of the Rathfarnham/Temploeogue to City Centre route.
- **Ensure signal priority for cyclists at junctions.** The key junction redesigns along this route are welcome, in particular the improved facilities for both pedestrians and cyclists at the busy KCR junction. Priority signals should be installed to give cyclists a head start at any junctions where they could potentially come into conflict with left-turning traffic.
- **Employ engineering designs to ensure the success of the 'quiet streets'** - including looking at interventions that will make it a safe, comfortable and attractive route for cyclists and families to use, for example a distinct surface treatment denoting a clear prioritisation of cyclists and traffic calming measures as necessary.

PUBLIC TRANSPORT IMPROVEMENTS

Efficiency, reliability and regularity of the bus service is paramount if BusConnects is to instigate the necessary modal shift away from private car use and over to sustainable, public transport, and every effort must be made to ensure that the buses are not blocked by private modes of transportation, or indeed by delivery vehicles or illegally parked cars.

Additionally, for the sustainability of this development into the future, the NTA must ensure there is adequate capacity on all routes, as communities closer to the city will not be able to access improved services if buses are full when they reach the key urban villages of Terenure, Rathgar and Rathmines.

Finally, enforcement and monitoring of bus lanes, gates and new traffic measures will be crucial. On May 4th, 2023, in a reply to Neasa Hourigan TD, Minister of State at the Department of Transport, Jack Chambers TD acknowledged that:

"With the State having incurred the investment required to deliver BusConnects, it is vital to ensure sufficient enforcement is in place to protect the benefits of that investment from widespread breaches of

the restrictions applying to bus lanes, cycle tracks and junctions. To effectively ensure this outcome, camera-based enforcement will be required to augment the on-street activities of An Garda Síochána.”

He stated that *“camera-based enforcement also has a wider role to play in enhancing road safety, particularly at junction locations”,* and affirmed that *“Action 67 in the Road Safety Strategy Phase 1 Action Plan 2021–2024 sets out the need to “further develop camera-based enforcement by the Gardaí, including at junctions and for management of bus/cycle lanes.” The Department of Transport has arranged for the National Transport Authority, NTA, to undertake the first phase of this action, namely, to establish and chair a working group to make recommendations on how it should be progressed.”*

It is imperative that the NTA prioritises the establishment of this working group and expedites the work needed to have camera-based enforcement in place to ensure the efficiency, reliability and connectivity of the F spine services on the Kimmage to City Centre corridor, along with the safety of cyclists who may potentially be sharing the road with buses, taxis and other vehicles.

BIODIVERSITY

The NTA’s efforts to minimise tree loss in its revised BusConnects plans are welcome, and in particular the re-routing of cyclists away from Ravensdale Park will allow for the retention of mature trees in an important pocket for nature in this part of the city, and where some trees are already going to be lost to the Poddle Flood Alleviation Scheme. The Dublin Tree Strategy recognises the numerous environmental and social benefits of mature trees to our cityscape, from air quality and climate mitigation to amenity value, heritage and placemaking. As such, the NTA must strive to protect every tree possible, and where new trees are proposed these should take a holistic approach to biodiversity, with a focus on native varieties suitable for long-term retention, accompanied by pollinator-friendly plants, shrubs, flowers, and SUDs and rain garden designs where possible.

The Kimmage route runs alongside, or intersects with the river Poddle and extreme care should be taken to consider all aspects of this plan in the context of the aforementioned Poddle FAS works commencing next year. In particular the NTA should be cognisant of the work of the Kingfisher Project and tentative plans to ‘daylight’ sections of the river Poddle, and also of the sensitivity and ecological value of the riparian habitat along the proposed ‘Poddle cycleway’ at the Stone Boat, and indeed the heritage value of the Stone Boat itself. This should be carefully measured against the benefits to cyclists of a revised off-road cycle track, which, in this plan, offers a more circuitous off-road route that brings them back out onto the Lower Kimmage Road. In its revised form this may not reflect the desire line of cyclists who might prefer to continue on Sundrive Road to the junction and then turn left onto the Lower Kimmage Road. Provision of segregated cycling infrastructure at and beyond the junction of Sundrive Cross may be preferable to the complicated infrastructure needed to complete this off-road option.

BUS GATE, ACCESS, AND TRAFFIC IMPLICATIONS

While the anticipated impact of a vastly improved, regular and reliable bus service (along with the provision of enhanced pedestrian facilities and safe cycling infrastructure) would be a modal shift that

would result in a large degree of traffic evaporation, there are significant concerns that untenable volumes of traffic will be directed off the bus corridors and down residential streets.

The failure of the NTA to provide cumulative traffic modeling for the impacts of several corridors and their ensuing traffic restrictions on communities across Kimmage Rathmines has led to confusion, speculation, and a good deal of local upset which could have been offset by stronger local engagement. There remains, for example, an alarming lack of clarity about the routes to be taken by HGVs and other large delivery or service vehicles, and the mitigation measures that will be employed if these vehicles are forced to use narrow residential streets due to the cumulative impact of bus gates, and although requested by myself at the last stage of consultation, there has been no indication of a firm commitment to or budget for 'aftercare' by the NTA – that is, ongoing traffic monitoring and mitigation measures where the quality of life, of air and of the immediate environment for residents has been significantly altered by the rerouting of vehicles.

A number of concerns have arisen around access and egress for local residents to adjacent urban centres, local services and sports grounds due to the combined impact of the bus gate and the filtered permeability measures that are proposed for some streets to prevent them from being subject to rat running and servicing as a bus gate bypass. As with other concerns around the implementation of BusConnects, many of these concerns could be allayed with stronger communication on the exact nature of the proposals, the rationale for their introduction, and guidance on access and egress routes once these measures are in place.

For the scheme to have the desired impact, restrictions will have to be a) enforceable and b) rigorously enforced. Many traffic restrictions will be installed and managed solely with signage and for the successful implementation of the BusConnects scheme, it is vital that turn bans and bus gates are maintained through camera-based enforcement.

Likewise, assurances must be given regarding speed limits and enforcement of same, and proposals should be put forward for design interventions that will ensure compliance where reduced speed limits are in play. It cannot be assumed that the Gardaí will be able to monitor and enforce new traffic measures, including bus gates and turn bans, so if the NTA is to rely on camera enforcement to augment the work of the Gardaí, it must prioritise the establishment of the aforementioned working group. It must also clarify how the anomalous 30km per hour speed limit proposed for this route will be executed and enforced.

To adequately manage and mitigate the implications of traffic restrictions, the NTA should:

- **Commit to and budget for a programme of monitoring and mitigating adverse implications.**
- **Consider the use of further modal filters or filtered permeability interventions to discourage rat-running where the bus gate or turn bans will restrict movement.**
- **Expedite the work needed to initiate camera-based enforcement.**

CONCLUSION

As a Councillor, I welcome the fact that there has been strong engagement to date on the BusConnects project, and that prior consultations with the wider community in Kimmage, and with residents on the Lower Kimmage Road, have led to some positively received outcomes where the NTA have sought to implement community-driven solutions.

It is unfortunate that Covid restrictions inhibited the degree to which that consultative approach could inform the final stage of the design, but this project is vital to the future and the climate-resilience of our city, and we must not miss this opportunity to get it right.

I would ask An Bord Pleanála to consider the observations above and support the necessary revisions and stipulations that will ensure that this project can be delivered in line with proper planning for the sustainable development of our city, and in a way that maximises its potential to transform our city, our urban villages and our communities for the better.

Kind regards,

A handwritten signature in black ink, appearing to read 'Carolyn Moore', written in a cursive style.

Cllr Carolyn Moore

Green Party Councillor for Kimmage-Rathmines