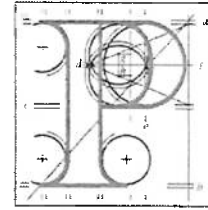


Our Case Number: ABP-317660-23



**An
Bord
Pleanála**

Cornelia Raftery
52e Mount Argus Road
Harolds Cross
Dublin
D6WHW32

Date: 15 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

Tel	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

AN BORD PLEANÁLA

13 NOV 2023

LTR DATED _____ FROM _____

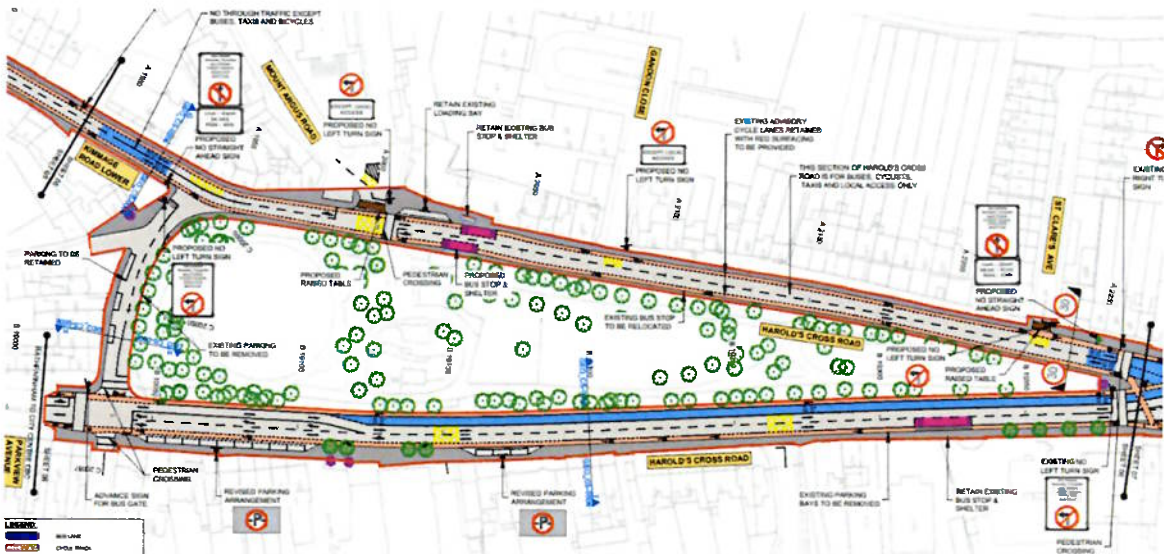
LDG- _____

ABP- 317660-23

Cornelia Raftery
 52e Mount Argus Road
 Harolds Cross
 Dublin
 D6WHW32
 0894539765

Observation on Bus Connects Kimmage Core Bus Scheme

An Bord Pleanala Reference 317660



The current Bus Connects plans shows the removal of pedestrian footpath and a portion of the apron at the main gate at the south end of Harolds Cross Park as per the extract shown above.

The intent of the Bus Connects projects is stated as:

The aim of the BusConnects Core Bus Corridor Schemes is to provide over 200 km of enhanced walking, cycling, and bus infrastructure on key access corridors in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along these corridors.

The proposal to remove the footpath is to protect onstreet car parking spaces and to speed up car traffic speeds. This seems to me to be the complete opposite of the stated aim of the project.

My concerns in particular about the removal of the existing, and historic, footpath are as follows:

1. I am concerned about destabilising both the railings and the adjacent mature trees. The tree survey for Bus Connects does not include the 7 mature trees in Harold's Cross Park that will be directly affected by the removal of this footpath. The 7no. Mature trees immediately inside the park railings will be greatly affected by works carried out under their canopy, which will cause root destabilisation and accelerate their decline. Even if this work is carried out to the specification for other trees surveyed for this scheme it will lead to the more rapid loss of these trees. Routing traffic immediately under the canopy of these trees will require that they need massive crown reduction which will lead to the speeding up of their decline and the earlier loss of these trees.
2. The park has no lighting and is closed after dark so does not provide an alternative route for pedestrian moving between Lower Kimmage Road and Harold's Cross Road as is stated in the documents provided. Both these roads have housing, shops & bus stops so this is currently a busy pedestrian route. The new layout proposed by Bus connects will force pedestrians to cross moving traffic 3 times to go between these roads where currently they can negotiate this route with only 1 street crossing. Removal of these pedestrian facilities negatively impacts access to and from the park and permeability in the general area of the park while significantly increasing traffic volumes. This is of particular concern at the morning school times when the bus gate at North West of the park is closed.
3. The removal of a pedestrian footpath to facilitate and prioritise an increase in traffic flow & increased speeds is against current planning guidelines. This loss of pedestrian facilities will create a car dominant street in an urban village. Existing segregation between cars & pedestrian will be lost. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (2009)*.
4. *Design Manual for Urban Roads and Streets (DMURS) guidelines state:* Prioritise walking, cycling and public transport, and minimise the need to use cars; the removal of this public footpath is not in line with this guidance.
5. *Design Manual for Urban Roads and Streets (DMURS):* Minimum footway widths are based on the space needed for two wheelchairs to pass each other (1.8m). This is the only public footpath that is currently to public footpath width standards at access points to the park. The path width along the Lower Kimmage road where 2 access points to the park are located are 900mm wide at park gate points. This means that these paths do not allow for universal access and also mean a barrier has to be positioned along the path edge to prevent accidents between traffic and pedestrian. There does not seem to be any proposal for barriers.
6. The proposed increased width of the vehicular lane is in excess of what is required. The current width of the vehicular lane facilitates a two way traffic which works well. It reduces traffic speeds along this stretch of street and facilitates pedestrian movement across the road and entering and leaving the park. Existing parking bays also slows traffic movement along this busy pedestrian route between bus routes.
7. This footpath still retains its original historic kerbing, which is the last remaining original footpath kerbing in the vicinity of Harold's Cross Park. All other original kerbing having been removed in previous path width reductions on the Lower Kimmage road side.

8. Traffic will now move along the line of the parks original railing and the buffer to damaging this original railing will be lost when the path is removed. This will put this historic park boundary in immediate danger of damage from fast moving traffic. Sections of railing along Lower Kimmage road were damaged by speeding traffic and have only recently been repaired.

The proposal to remove the footpath should be removed in total from the scheme. It is explicitly against the stated objectives of the Bus Connects scheme. It reduces pedestrian facilities purely to speed up private car traffic. It ignores the historic trees within the park which will be destroyed by the construction of a wider road service. It ignores the historic kerbing and railings to the park. It forces pedestrians on a roundabout route to facilitate private cars. There are two primary schools and one secondary school in the immediate area - this proposal will only hinder attempts to increase walking and cycling to school.

Kind Regards,

Cornelia Raftery