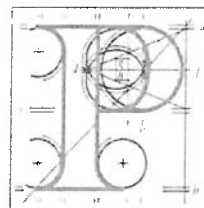


**Our Case Number:** ABP-317660-23



**An  
Bord  
Pleanála**

Ivana Bacik  
Dail Eireann  
Kildare Street  
Dublin 2

**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 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

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<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>Riomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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**Kimmage, Terenure, Rathmines to City Centre Bus Corridor Scheme – No 317660**

**Observation – Ivana Bacik TD and Cllr Fiona Connelly**

Dáil Éireann, Leinster House, Dublin 2

As a public representative for the Dublin Bay South constituency and a local resident in Dublin Bay South, and having appraised the documentation supplied by Bus Connects, I wish to provide the following observations on the Kimmage to City Centre Core Bus Corridor Scheme.

First, I wish to express my support for the scheme, which represents a key step towards improving public transport and cycling infrastructure along this busy route. As a regular cyclist myself, and noting the support of the Dublin Cycling Campaign for the scheme, I am strongly supportive of plans for improved bus services, the increased provision of safe cycle lanes and active travel infrastructure. It is of great benefit generally to see plans for the development of a cleaner, quieter, more sustainable environment for everyone living and working in the area covered by this scheme.

Indeed, as we move to a more sustainable city, it is essential that greater provision is made to facilitate active travel and improved facilities for pedestrians and cyclists. It is also essential that increased levels of public transport options are provided, and in particular that buses are given enhanced space on our roads.

Increased frequency of buses, and reduced journey times on public transport, will encourage and enable more people to take public transport, which in turn will lead to reduced levels of congestion in our urban villages. Reducing traffic congestion will result in substantial benefits for local communities in reducing carbon emissions, improving air quality, and enhancing pedestrian and cyclist safety.

I am also strongly supportive of the move towards metro and light rail transit for Dublin and will keep pressing, along with local residents and constituents, for the introduction of a fair, forward-looking, and sustainable transport solution for our area and the entire city – in particular, the urgent development of the long-awaited Metro Link.

Along with local residents, I have sought to see provision made for the continuation of Metro Link from St Stephen's Green to South West Dublin, and have questioned the decision to make provision for the terminus at Charlemont. We need to ensure the provision of convenient, well-planned, and affordable public transport with accessible links between buses, light rail, and metro, so as to bring about significant and necessary reductions in car usage.

In the short to medium term, it is unarguable that buses remain the most accessible and effective public transport option available for supporting Dublin's growing population. Therefore, the implementation of improved and enhanced bus corridors and bus lanes will enable this mode of public transport to serve local communities in a more efficient, accessible, and timely manner.

In this submission, along with expressing my general support for the scheme, I also wish to raise some concerns and observations that have been expressed to me by a number of residents' associations and constituents, and that are related to particular aspects of the scheme. I would ask that these views and concerns be taken into account.

I thank all the many constituents, residents and groups in and adjacent to my constituency who have engaged with me on this scheme.

## **Harold's Cross**

Harold's Cross is a vibrant and dynamic urban village and residential community with many amenities and extensive pedestrian footfall. However, Harold's Cross remains far too unsafe for pedestrians, especially children and those with disabilities or impaired mobility, due to the historic prioritisation of cars and the continued dominance of the car throughout much of the area.

The junction at Emmet Bridge is particularly dangerous for both cyclists and pedestrians with cars regularly bottlenecking during peak periods. The easy passage of buses along the route can also be impeded due to considerable amounts of car traffic. On these grounds, I welcome the implementation of new pedestrian and cycle bridges on Emmet Bridge and the building of a new boundary wall on the bridge to increase the width of the bridge. These measures will allow more space for active travel, improve safety on the bridge and create more space for bus transit.

## **Kimmage**

Like Harold's Cross, Kimmage is a dynamic and vibrant community with an excellent mix of residential homes, commercial enterprises and leisure facilities located around the village centre. Plans to enhance pedestrian safety at the KCR are very welcome as this crossing remains highly unsafe.

I would note the concern of Lower Kimmage Road Resident's Association, that the current version of the scheme contains considerably less public realm improvements at the intersection of Sundrive Road and Lower Kimmage Road, than previous proposals. In previous iterations of the scheme, there was tree planting and other public realm improvements planned, but these have since been removed in favour of maintaining parking spaces in front of businesses. I would urge Busconnects to consider reintroducing public realm measures from some of the previous schemes, which would add significantly to the overall amenity of Kimmage Village

I welcome the introduction of a peak hours bus gate from Kimmage Cross Road to Harold's Cross which will improve journey times for buses and allow cyclists to travel during peak hours without mixing with traffic. However, in line with the Dublin Cycling Campaign, I would recommend that the bus gate hours be modified to incorporate primary school closing times so that children cycling home from school can travel without interference from traffic. Given the extensiveness of the bus gate, it will also be necessary to ensure proper enforcement along the route, and I would encourage Busconnects to engage with An Garda Síochána in this regard, and to consider new technologies for the enforcement of bus gates. However, I would note the concerns of Larkview FC, whose club is situated along the bus gate route. I would ask that consideration be given by Busconnects as to how to facilitate club users while maintaining the bus gate.

I have consulted with representatives from the Mount Argus Resident's Association who have expressed concerns regarding the proposed Poddle Cycleway which now ends by joining Mount Argus View and exiting onto Lower Kimmage Road, rather than continuing through Mount Argus Park, as was planned in previous proposals. This significantly shortens the cycleway, makes it circuitous and forces bikes to mix with traffic on the already dangerous Mount Argus view. I would ask that Bus Connects consider reinstating the previous route through Mount Argus Park, which would be safer for cyclists and increase the length of the cycle route.

Furthermore, I echo the comments of Dublin Cycling Campaign who note the intermittent cycle lanes along Kimmage Rd Lower. On the outbound route, the cycle lanes are often absent in favour of car parking spaces. With respect for the need for some parking along the route, parking spaces

should not be at the expense of cycle lanes, which are essential for ensuring cyclist safety and facilitating Active and Sustainable travel. Along this route the scheme has also maintained the advisory cycle paths rather than segregating the cycle paths with bollards. This makes cycle lanes extremely vulnerable to illegal parking, resulting in the cycle lanes being unusable, as is currently the case. I would request, therefore, that the scheme be redesigned to include mandatory cycle lanes with proper segregation, with appropriate gaps for driveways.

I would also note that many of the cycle lanes along the entire route will not be fully segregated and are narrow in width, which is more dangerous for cyclists who are at risk of being cut off by traffic or hit by the doors of parked cars. Again, I would highlight the comments of Dublin Cycling Campaign, who are requesting that the scheme be updated to increase the overall proportion of segregated cycle lanes and to ensure greater width in cycle lanes.

Finally, I support the concerns of St Louis' High School in Rathmines, as a significant number of students who live in the Kimmage/Drimnagh/Walkinstown/Ballyfermot areas and may no longer have direct transport links to the school, as a result of the Busconnects Dublin network redesign which phased out the 18 bus as of 26<sup>th</sup> November. While I am generally supportive of the network redesign, it must not result in a service loss, especially for the school population. I would note that the planned new 82 bus would have made up for some of the loss of coverage by the 18 but this was not implemented in the 5b redesign which phased out the 18. I would ask that Busconnects give priority to the implementation of the new 82 route as well as further consideration to impact of network redesign on school going populations.

### **Impact of Construction on Local Communities**

As stated above, I strongly support proposals to increase bus connectivity, support active travel and reduce congestion in the area covered by this scheme. I would ask that during construction every effort is made to ensure that there is minimal disruption to local communities. Where possible, construction should take place in daytime hours so as to keep noise pollution to a minimum at night. When construction begins, I would ask that there is sufficient communication with residents and businesses regarding the times and dates of construction; this will allow residents to make the necessary arrangements and prevent any loss of business.

I would submit that once plans are finalised, Bus Connects should consult with Dublin City Council and inform local public representatives and residents' groups so as to ensure a coordinated approach to roadworks along the routes. Ideally, if there is any other maintenance work to be done along these routes, it should be done in conjunction with Bus Connects construction, so as to minimise possible disruption for residents and businesses.

In addition, it is vital that individual local residents and households who will be directly affected by construction works in implementing this scheme and other Bus Connects schemes should receive timely and regular communication about the works due to be carried out, the relevant timeframes and impact upon their homes, e.g. with temporary loss of utilities during construction; it is very important that those directly affected should receive such information on a timely basis.

### **Protection of Biodiversity**

I would request that, when finalising the routes, consideration should be given to the negative environmental impacts of construction and that plans should be developed to have as little long-term impact on biodiversity as possible. In particular, it is vital that, as far as possible, existing tree coverage should be preserved along the route.

## **Public Consultation – Level of Required Fee**

Finally, it is vital that public consultation is actively supported and facilitated with proposals and schemes like Bus Connects. In this regard, I have previously expressed my concern about the level of fee required to make a submission on this consultation process – see below for the text of my press statement issued in May on this point. For some local residents’ groups and individual residents who will also be making submissions on other Bus Connects schemes, they may have to pay multiple fees - €50 in respect of each consultation.

Thus, I have called on the government to review the level of the fee required in public consultations on Bus Connects schemes, so as to enable greater public participation and accessibility in the ongoing statutory consultation process. Our local Labour Councillors in the relevant wards in Dublin Bay South, namely Mary Freehill (now on leave) and Fiona Connelly have also expressed their concern to me on the issue of fee levels for engagement with the consultation process. Like me, they have been contacted by many constituents on this, and thus our submission reflects those concerns.

PRESS RELEASE ISSUED 26 MAY 2023

### **Concern raised about impact of fee required for civic engagement in statutory public consultation processes**

Labour Leader Ivana Bacik TD has raised concern about the fees associated with making a submission to An Bord Pleanála during statutory public consultation processes on infrastructure projects.

Deputy Bacik said,

“Ireland has ratified the Aarhus Convention, which is an international agreement affirming the right to public participation in decision-making. Civic engagement should not be contingent on income. Individuals should not be prohibited from having their say in a public consultation, simply because they cannot afford it.

“At a time when we are experiencing a cost-of-living crisis, I am increasingly hearing from constituents who are having to think twice before making a submission during public consultation on new infrastructure in their area. We all want to see new projects introduced to improve infrastructure in this country, and I am particularly supportive of effective new public transport, active travel and cycling infrastructure. That is why it is so important that a robust planning and consultation process is in place to ensure that issues are resolved early on. Everybody stands to benefit from a more accessible consultation process.

“My constituents in Dublin Bay South have contacted my office on many occasions, frustrated because of financial restrictions on their engagement with the mechanisms which are there to enable their participation. In the context of the ongoing statutory consultation on the Bus Connects route from Rathfarnham/Templogue-City Centre, constituents who wish to make comments in support of, and/or with concern about, aspects of the plans, have expressed their concern at the €50 fee associated with making a submission to An Bord Pleanála within this process. I would ask Government to consider whether the level of this fee should be reviewed, with a view to strengthening deliberative democracy and a process of inclusive social dialogue at local and national level.”

ENDS



**IVANA BACIK TD**  
Dublin Bay South

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*Please note that any personal data contained in your email correspondence with Ivana Bacik TD will be processed by Ivana Bacik TD and her staff as a data controller in accordance with applicable data protection law. Much of this data processing will be done in connection with representations/ requests made and also for electoral purposes. If you have received this email in error, please notify us immediately and then delete it. Please do not copy it, disclose its contents or use it for any other purpose. Thank You.*

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