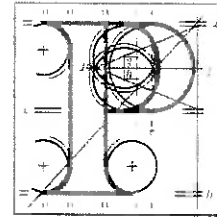


**Our Case Number:** ABP-317660-23



**An  
Bord  
Pleanála**

James Purcell  
128b Kimmage Road Lower  
Harold's Cross  
D6W NY24

**Date:** 19 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.

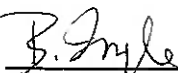
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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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Glao 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

128b Kimmage Road Lower  
Harold's Cross  
Dublin  
D6W NY24

December 5<sup>th</sup> 2023

## **Bus Connects Dublin - Kimmage to City Centre Core Bus Corridor Scheme**

### **LA Road Development - Application**

**Bord Pleanála Case reference: HA29N.317660**

Dear Sir/Madam,

I am writing to you with respect to the above case reference and wish to make an observation to elements of the proposed scheme which will directly result in the loss of amenity and access by residents of Kimmage Road Lower to their properties

The basis of this loss is covered by a number of characteristics of the proposed scheme.

#### ***Bus Gates***

- The imposition of the bus gates on Kimmage Road Lower without the accompanying provisions that would mitigate the loss of direct access by homeowners to their properties is an unnecessary, excessive development. It effectively bars the residents of Kimmage Road Lower from direct access to and egress from their properties for much of the day. Technology is available whereby residents could be allowed access through the bus gate without hindrance. Such "whitelisting" schemes are in use in other jurisdictions, with the technology in use in Ireland.

**I request that the developer is instructed to implement such a scheme and maintain the unencumbered access of residents to their properties. Residents could opt in to its use if they wish to avail of the "permitted access" status it enables.**

#### ***Pavement Treatment Plans***

- The development plans propose additional raised paving on the section of Kimmage Road Lower from Numbers 126 to 136. Outside of major road junctions this is the only section of the entire Kimmage Road Lower where such additional raised paving is proposed. It appears to be a wholly unnecessary and overbearing piece of development. The gap between these proposed two (raised) pavements is too narrow to allow for unencumbered access and egress to and from a lane (located between numbers 128C and 130 Kimmage Road Lower) which is used for vehicular rear access for up to c.28\* properties, with that lane being the **ONLY FRONT and PRIMARY** vehicular (and home occupants) access for properties 128a, 128b, 128C, 128D and 128E Kimmage Road Lower. This obstruction means that vehicles will not have enough room to turn into and out of the lane and it will lead to those vehicles having to drive into oncoming traffic to effect that turning. (see **Appendix 1**)  
*\*Numbers 128-152 Kimmage Road Lower and numbers 14-23 Larkfield Avenue.*
- The imposition of the standalone raised pavements, from numbers 126 to 136 Kimmage Road Lower, segregating the cycle lane from the road, effectively prevents service vehicles, such as refuse collection, from directly accessing the related properties. It will create difficulties for Waste removal companies servicing properties numbered from 126 to 136

Kimmage Road Lower and will result in emptied bins being further strewn along the road. This practice (of not placing bins immediately outside of owning property) WILL be exacerbated, leading to pedestrian and possibly cyclists' movement obstruction.

**I request that the developers are instructed to modify their plans and remove the proposed section of unnecessary paving from the proposed development. The proposed section of paving is approximately 50m long and as stated above appears to be the only such section outside of major junctions. It appears to be a wholly unnecessary and overbearing piece of development.**

#### ***Traffic Signs and Road Markings***

- This scheme drawing appears to suggest that allowance has been made for vehicular access and egress of the lane between 128C and 130 Kimmage Road Lower. Should the scheme be approved, this MUST be retained. If the road markings do not currently cater for unencumbered access and egress then it MUST do so. (Note: This lane is used for vehicular rear access for up to c.28 properties\*, with that lane being the ONLY FRONT and PRIMARY vehicular (and home occupants) access for properties 128D and 128E Kimmage Road Lower. (see Appendix 2).

*\*Numbers 128-152 Kimmage Road Lower and numbers 14-23 Larkfield Avenue.*

**I request that any road markings and traffic signage provide for the unencumbered access and egress to the lane between 128C and 130 Kimmage Road Lower.**

#### ***General Arrangement - Bus Stops & Shelters***

- The proposed construction of a bus stop shelter at bus stop 2391, Priory Road, is impractical due to the narrow width of the pavement at this location. Its introduction will lead to the obstruction of movement of pedestrians including those using mobility vehicles and buggies, (see Appendix 3).

**I request that the developers are instructed not to proceed with plans to build a bus shelter at this location**

#### ***Sectional 30kph Speed Limit***

- The proposed speed limit of 30kph is not a realistic speed limit for a road of the calibre and scale of Kimmage Road Lower. Due to the gearing in most cars, travelling at 30kph is less fuel efficient and doesn't reduce emissions when compared to 50kph. It is also noted that the reduced speed has only been applied on the section of road from Ravensdale Park to Harold's Cross Road. Presumably there is a reason for this inconsistency but the proposal doesn't provide any explanation.

**I request that the developers are instructed to maintain the existing 50kph limit for the entirety of Kimmage Road Lower and not implement unnecessary sectional speed limits.**

The included appendices show the relevant sections of the proposed route to which I have referred above. I ask An Bord Pleanála to give my observations due consideration.

Yours sincerely,

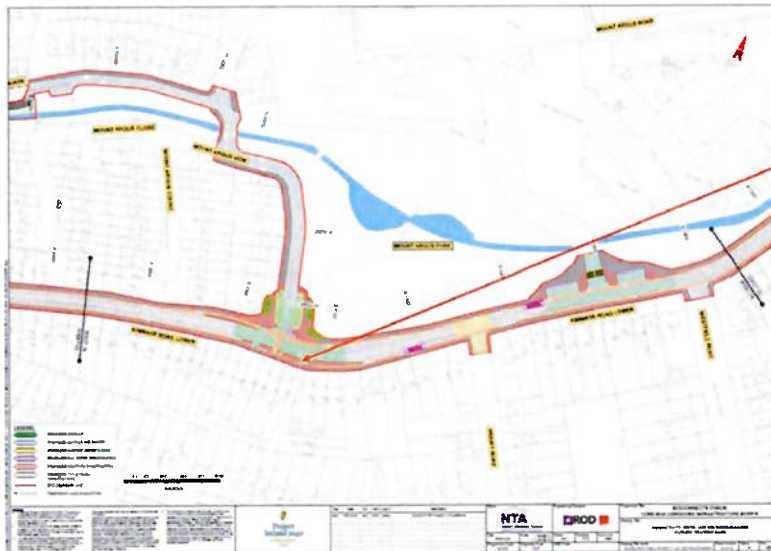
James Purcell

**Appendix 1 - Pavement Treatment Plans**

**Bus Connects – Kimmage to City Centre Scheme - Pavement Treatment Plans**  
 Bord Pleanála Case reference: HA29N.317660

**OBJECTION**

Programme Title <b>BUSCONNECTS DUBLIN                  CORE BUS CORRIDORS INFRASTRUCTURE WORKS</b>			
Drawing Title KIMMAGE TO CITY CENTRE CORE BUS CORRIDOR SCHEME PAVEMENT TREATMENT PLANS			
Drawing File Name BCIDD-ROT-PAV_PV-0011_XX_00-DR-CR-0004	Sheet Number 04 of 14	Status A	Rev M01



**OBJECTION:**  
 The introduction of raised pavements along this section of Lower Kimmage Road appears to be random and sporadic and there is no discernible reason as to why they are placed at these specific positions. Their presence does however lead to problems and any notional benefits are outweighed by those problems.

**SEE NEXT PAGE FOR ZOOMED-IN IMAGE LOCATION AND PROBLEM DESCRIPTION.**

BUSCONNECTS DUBLIN CORE BUS CORRIDORS INFRASTRUCTURE WORKS			
Drawing File Name BCIDD-ROT-PAV_PV-0011_XX_00-DR-CR-0004			
Sheet Number 04 of 14	Status A	Rev M01	

Bord Pleanála Case reference: HA29N.317660

[Grab your reader's quote from the document emphasize a key point. To anywhere on the page, just



attention with a great or use this space to place this text box drag it.]



**OBJECTIONS:**

The introduction of **raised pavements** along this section of Lower Kimmage Road appears to be random and sporadic and there is no discernible reason as to why they are placed at these positions. **Their presence does however lead to problems and any notional benefits are outweighed by those problems:**

1. The gap between these proposed two (raised) pavements is too narrow to allow for unencumbered access and egress to and from the lane which is used for vehicular rear access for up to c.28 properties\*, with that lane being the **ONLY FRONT and PRIMARY** vehicular (and home occupants) access for properties 128D and 128E Kimmage Road Lower. This obstruction means that vehicles will not have enough room to turn into and out of the lane and it will lead to those vehicles having driving into oncoming traffic.
2. It will create difficulties for Waste removal companies servicing properties numbered from 128 to 136 Kimmage Road Lower and will result in emptied bins being further strewn along the road. This practice (of not placing bins immediately outside of owning property) **WILL** be exasperated, leading to pedestrian and possibly cyclists movement obstruction.

\*Numbers 128-152 Kimmage Road Lower and numbers 14-23 Larkfield Avenue.

**Design amendment required:** the proposed raised pavements in front of numbers 126 to 136 Kimmage Road Lower should be removed. Should any alternative structures be proposed, then they too **MUST NOT** give rise to the above identified problems.

Cars for properties 128, 128D and 128E are legitimately parked here.



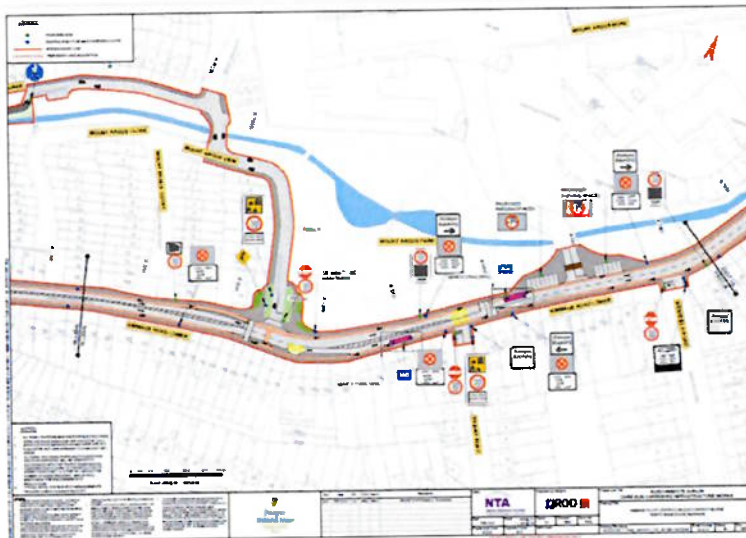
SUBCONNECTS DUBLIN		
CORE BUS CORRIDORS INFRASTRUCTURE WORKS		

## Appendix 2 - Traffic Signs and Road Markings

### Bus Connects – Kimmage to City Centre Scheme – Traffic Signs & Road Markings Bord Pleanála Case reference: HA29N.317660

#### OBSERVATION

Programme Title <b>BUSCONNECTS DUBLIN CORE BUS CORRIDORS INFRASTRUCTURE WORKS</b>			
Drawing Title <b>KIMMAGE TO CITY CENTRE CORE BUS CORRIDOR SCHEME TRAFFIC SIGNS &amp; ROAD MARKINGS</b>			
Drawing File Name BCIDD-ROT-TSM_GA-0011_XX_00-DR-CR-0004	Sheet Number 04 of 14	Status A	Rev M01



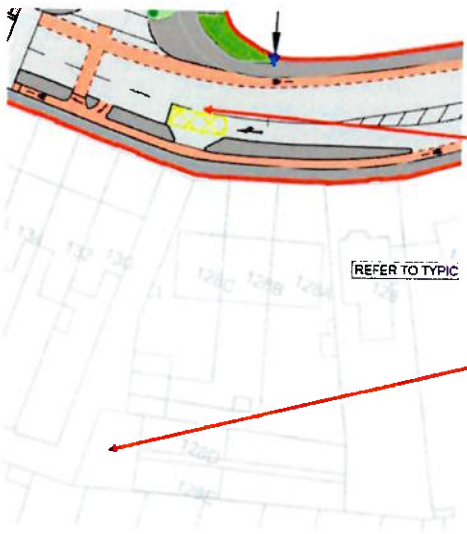
#### OBSERVATION:

**Road markings – provision for and maintenance of lane vehicular access:** This scheme drawing appears to suggest that allowance has been made for vehicular access and egress of the indicated lane – should the scheme be approved, this **MUST** be retained; if the Road markings do not currently cater for that unencumbered access and egress then it **SHOULD** do so.

**SEE NEXT PAGE FOR ZOOMED-IN IMAGE LOCATION AND OBSERVATION DETAILS.**

Programme Title <b>BUSCONNECTS DUBLIN CORE BUS CORRIDORS INFRASTRUCTURE WORKS</b>			
Drawing Title <b>KIMMAGE TO CITY CENTRE CORE BUS CORRIDOR SCHEME TRAFFIC SIGNS &amp; ROAD MARKINGS</b>			
Drawing File Name BCIDD-ROT-TSM_GA-0011_XX_00-DR-CR-0004	Sheet Number 04 of 14	Status A	Rev M01

Bord Pleanála Case reference: HA29N.317660



**Road markings – provision for and maintenance of lane vehicular access:** This scheme drawing appears to suggest that allowance has been made for vehicular access and egress of the indicated lane – should the scheme be approved, this **MUST** be retained; if the Road markings do not currently cater for that unencumbered access and egress then it **SHOULD** do so.

**Note:** This lane is used for vehicular rear access for up to c.28 properties\*, with that lane being the **ONLY FRONT and PRIMARY** vehicular (and home occupants) access for properties 128D and 128E Kimmage Road Lower.

\*Numbers 128-152 Kimmage Road Lower and numbers 14-23 Larkfield Avenue.

**Cars for properties 128, 128D and 128E are legitimately parked here.**



Programme Title			
<b>BUSCONNECTS DUBLIN</b>			
<b>CORE BUS CORRIDORS INFRASTRUCTURE WORKS</b>			
Drawing Title			
KIMMAGE TO CITY CENTRE CORE BUS CORRIDOR SCHEME TRAFFIC SIGNS & ROAD MARKINGS			
Drawing File Name		Sheet Number	Page
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Bord Pleanála Case reference: HA29N.317660

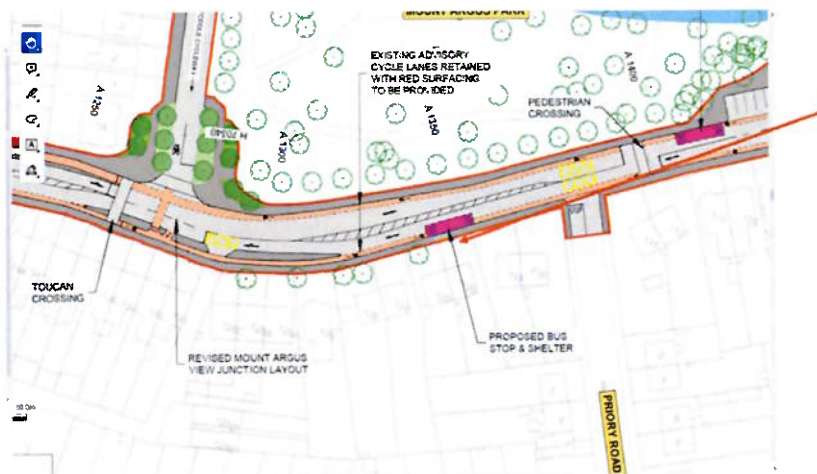
**Appendix 3 - General Arrangement - Bus Stops & Shelters**

**Bus Connects – Kimmage to City Centre Scheme – General Arrangement – Bus Stops & Shelters**

Bord Pleanála Case reference: HA29N.317660

**OBJECTION**

<b>Programme Title</b> <b>BUSCONNECTS DUBLIN</b> <b>CORE BUS CORRIDORS INFRASTRUCTURE WORKS</b>			
<b>Drawing Title</b> <b>KIMMAGE TO CITY CENTRE CORE BUS CORRIDOR SCHEME</b> <b>GENERAL ARRANGEMENT</b>			
<b>Drawing File Name</b> BCIDD-ROT-GEO_GA-0011_XX_00-DR-CR-0004	<b>Sheet Number</b> 04 of 14	<b>Status</b> A	<b>Rev</b> M01



**Bus Stop number 2391 - Shelter located at Priors Road – OBJECTION:**

- The proposed introduction of this Bus shelter is impractical due to the narrow width of the pavement at this location. Its introduction will lead to obstruction of movement of pedestrians including those using mobility vehicles and buggies.

<b>Programme Title</b> <b>BUSCONNECTS DUBLIN</b> <b>CORE BUS CORRIDORS INFRASTRUCTURE WORKS</b>			
<b>Drawing Title</b> <b>KIMMAGE TO CITY CENTRE CORE BUS CORRIDOR SCHEME</b> <b>GENERAL ARRANGEMENT</b>			
<b>Drawing File Name</b> BCIDD-ROT-GEO_GA-0011_XX_00-DR-CR-0004	<b>Sheet Number</b> 04 of 14	<b>Status</b> A	<b>Rev</b> M01

Bord Pleanála Case reference: HA29N.317660