Our Case Number: ABP-317660-23



Lower Kimmage Road Residents' Association c/o Joan Moore 200 Kimmage Road Lower Dublin 6W

Date: 15 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,

Executive Officer

Direct Line: 01-8737184

HA02A



Bus Connects Dublin

Kimmage to City Centre

Core Bus Corridor Scheme

Bord Pleanála Case reference: HA29N.317660

Case Reference: 317660

Submission to: An Bord Pleanála BY

Lower Kimmage Road Residents' Association (LOKRA)

7th December 2023

Joan Moore (LOKRA Secretary)
200 Kimmage Road Lower
Dublin 6W

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LOKRA - An Introduction

LOKRA, the Lower Kimmage Road Residents' Association, welcomes the opportunity to respond to the NTA proposals to An Bord Pleanála for the above scheme.

LOKRA represents residents of Kimmage Road Lower (KRL) and associated small cul-de-sacs the length of KRL from the KCR to Harold's Cross Park who, as residents and households having invested significantly in this community, will both be significantly and directly impacted by the proposed changes. We are affiliated with the HCVCC and are actively involved in and engage with several neighbourhood groups and initiatives (Age Friendly, HX Grow, Kingfisher Project, HX Tidy Towns, Community Coffee groups and other social cohesion initiatives, etc.). We also maintain strong links with other local residents' associations and groups.

LOKRA has carefully engaged with published information and shared our understanding of facts with our community through meetings and online (www.lokra.ie). This submission is based on the sustained active participation of our community and their informed recommendations, developed to the best of our ability over the duration of the NTA consultation.

Our engagement with Transport and Planning

LOKRA accepts that buses form a vital part of our existing public transport infrastructure and should continue to do so. We view Bus Connects as a relatively nimble framework to mould and optimise bus priority to enhance public transport services and support a necessary modal shift from the private car, as an important contribution to meeting our national obligations in the context of the climate emergency and with all the associated benefits for residential communities in historic areas such as ours.

LOKRA and our residents have engaged energetically and constructively with the NTA proposals over a four-year period. We have had sustained, constructive engagement with the NTA directly on the Bus Connects programme since its launch, as evidenced in a total of 7 meetings with the NTA between 02/04/19 and 25/03/21¹. This engagement has resulted in a community-inspired, data-informed, appropriate alternative, which supports community health, improved public realm, the protection of important architectural heritage and the sustained, coherent delivery of reliable bus services, with the rejection of original unimaginative proposals for unnecessary, radical road widening to draw additional private vehicular traffic into the area, with associated loss of garden, green space and threat to community life.

As well as Bus Connects, LOKRA has also actively contributed to National Transport Strategies and City Development Plan consultations (www.lokra.ie). For the medium to long term, LOKRA strongly supports the call for an underground metro service as the backbone of a future-proofed, integrated transport system for southwest Dublin.

Considerations on the NTA Proposals

Bus Priority / Bus gates

In order to meet reliable demand for public transport, bus priority, frequency and predictability are accepted as essential elements in effective transport system design. Bus Gates have been a consistent feature of proposals for the Kimmage to City Centre Core Bus Corridor Scheme from the outset.

- LOKRA welcomes the NTA's change of approach from road widening on KRL, with all its associated negative impacts on community health, safety, coherence, etc., to the realisation of bus priority by means of bus gates – a far less invasive solution.
- While not without its own challenges, there is broad, if cautious, support for the perceived benefits towards a healthy living environment for our residential road that the provision of bus gates promises to bring with it.
- Residents welcome the promise of a cleaner, quieter, safer road and the subsequent anticipation of a better living environment because of reduced private vehicular traffic. KRL residents have direct experience of that which the Transport Strategy notes: 'an overly car-dependent culture results in congestion, air pollution, community severance and unattractive urban environments including poor

¹ Appendix 1 - References. #1

- walking, cycling and living'. The often-cited benefits from the greater use of electric and hybrid cars ignore the emissions of pollutant particulates from tyres, etc. Residents support the need to reduce private vehicular traffic on our road for our health and broad 'healthy city' concepts.
- OLOKRA notes that the proposed operating hours for the gate at Ravensdale Park are 6-10 and 16-20. Our lived experience is that there is a significant uptake in activity on the road around school leaving times most of which occur during the period between 10-16 when the gates will not be operational. We request that consideration be given to the impact of this on the aspiration of encouraging active travel to and from school.
- Previous LOKRA submissions to the NTA have noted the challenges of both speed and noise from overnight traffic. LOKRA request that traffic calming measures consistent with the proposed 30 Km/h limit be provided on Kimmage Road Lower to mitigate the problem of excessive speed.

Access & Egress / Traffic distribution

- To enable the implementation of this revised proposal and accommodate the needs of commuters from elsewhere, KRL residents would yield a number of concessions, including compromised, altered access and egress to their homes and preferred destination by private car. LOKRA has requested that 'whitelisting' for residents be considered in all submissions to the NTA on Bus Connects and recommends that this be re-considered here in the planning process, given accelerated developments in technology.
- During previous rounds of consultation, LOKRA raised the issue as to how heavy service vehicles, especially bin lorries, are to deal with the 24x7 bus gate at the northern limit of Kimmage Road Lower (McGowans Pub). To our knowledge, this issue has not been addressed by the NTA, resulting in the only option for such vehicles being to execute a dangerous three-point turn on one of the narrowest sections of our road. LOKRA requests that the grant of permission include a condition for the implementation of a permit system for these vehicles similar to that currently used to control 5+ axel vehicles in the city centre.
- o LOKRA notes the removal of an important mitigating element at **Sundrive Cross**, namely a morning peak no left turn restriction onto Kimmage Road Lower from Sundrive Road. This was included in the 3rd round of public consultation in Nov. 2020² following representations from LOKRA. LOKRA pointed out to the NTA that pre-covid one-third of traffic coming down the northern section of Kimmage Road Lower came by turning left from Sundrive Road, and upwards of 15% of morning peak traffic on Kimmage Road Lower turns right onto **Kenilworth Park**. LOKRA's assessment is that this will only increase as a result of traffic displacements due to the bus gates if the mitigating measure is not provided, and, therefore, **strongly recommends its reinstatement**. This is essential to protect the predictable, uninterrupted service delivery of buses required by Bus Connects.
- O LOKRA supports the initiative to develop broad Low Traffic Neighbourhoods in line with the DCC Development Plan, and Bus Connects proposals are perceived as a potential benefit in this regard as there would be a general reduction in inbound traffic across the neighbourhood, making it safer for children and vulnerable members of the community to more safely access local destinations and amenities.
- The potential for redistributed traffic, once experienced entirely on Kimmage Road Lower, is some cause for concern for our neighbours as some roads will share portions of redistributed vehicular traffic, which residents on Kimmage Road Lower have borne for decades.

Bus Stops

LOKRA welcomes the upgrades proposed for bus stops the length of KRL but queries the practicality of providing shelter and seating at all bus stop locations as promised in the plan. In particular, bus stops 2440 (Aideen Ave), 2391 (Priory Rd) and 2390 (Kenilworth Pk) are on narrow sections of path beside low boundary walls. The proposed shelters³ will, therefore, negatively impact the streetscape. The NTA has not provided any information on how such stops will look in the context of the streetscape, nor have they consulted with impacted homeowners.

² Appendix 1 - References. #2

³ Attention is drawn to an error on page 6 of the "02.-General-Arrangement-Drawings" document which states that there is an existing shelter at stop 2440. There is not.

Junctions

- o LOKRA welcomes improvements to junction layouts and infrastructure, particularly from the perspective of pedestrians and cyclists.
- o LOKRA recommends consistent treatment of all minor junctions in relation to surface / raised table treatment the length of KRL to allow a safe and consistent experience for pedestrians/buggies/mobility aids, etc. For example, raised tables are not being provided at junctions such as Aideen Ave, Kenilworth Park, Priory Road, Westfield Road, and Casimir Road with KRL – Why is this?

Pedestrians

- LOKRA welcomes the commitment to footpath widths of 2m or wider throughout the scheme (4.6.2.1).
- We also welcome the proposed provision of more pedestrian-friendly junctions and extra pedestrian
 crossing points in the scheme, which are essential for the safe circulation of our mixed-age community
 throughout the neighbourhood.
- While a new pedestrian crossing has been promised at St. Clare's school, we note that no extra pedestrian crossings are proposed for KRL. We recommend 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. At Kimmage Grove junction, there is a potential safety requirement in our view. Every evening, dozens of children from all directions cross Kimmage Road Lower at this point before and after their training at Larkview FC. Given safety is one of the core metrics for Bus Connects, we would welcome your consideration on the provision of a pedestrian crossing at this point.
- An additional pedestrian crossing is also recommended between Kenilworth Park and Westfield Road.
 This will assist residents and those exiting the bus in accessing the Mill Apartments, Mount Argus Church, Scout Hall, and St. Gladys Nursing Home safely. This safety measure would be particularly desirable at night.
- o It has been noted that previous planning permission has been granted for the introduction of a pedestrian crossing at McGowans Pub, co-locating with the proposed Bus Gate, as part of the school's traffic management plan. LOKRA supports the retention and speedy implementation of this pedestrian crossing as a matter of urgency.
- The removal of the path at the southern end of Harolds Cross Park is a cause for concern, particularly at the park entrance, where the available pavement space is being significantly reduced. Concerns are that this will impact pedestrian safety at the park entrance.

Cycling & Active Travel

- LOKRA also welcomes the intention to provide enhanced cycle facilities. The implementation of a
 properly enforced 30kph speed limit, in combination with an effectively operating bus gate
 infrastructure, should significantly improve cycling commuter safety.
- o The re-routing of cyclists away from the park at Ravensdale with the associated retention of mature trees there is welcomed.
- The proposed infrastructure cost and potential ecological damage to the riparian habitat of the Poddle River at the Stone Boat seems excessive in relation to the value achieved for cyclists – a relatively circuitous and longer route through a housing estate.
- The application proposes to apply a red surfacing to the advisory cycle lanes on both sides of the road from Sundrive Cross to Harold's Cross Park. There has been some concern expressed as to the quality of such surfaces from a quality and safety perspective in addition to long-term durability. Experience from other parts of the city shows that such surfaces inevitably degrade over time with a consequent negative impact on the streetscape.

Speed

 LOKRA strongly supports the reduction of speed limits in residential urban neighbourhoods making our streets cleaner, quieter and safer places and providing consistently for everyone. Ref: LOKRA submission to DCC Special Speed Limit By-Laws 2020⁴.

⁴ https://bit.ly/sslbl2020

 The promised reduction in direct traffic because of the proposed bus gates brings benefits to the entire neighbourhood, including, hopefully, a reduction in the number of speeding vehicles. Telraam data^s shows that a significant number of cars exceed 70kmph as they approach a dangerous bend on the road.

Local Schools

- LOKRA acknowledges that there will be additional vehicular traffic in the vicinity of the schools (Harold's Cross National School, Scoil Mológa and Naoínra) on Clareville Road. We, therefore, suggest a number of enhanced enforcement and mitigation solutions be considered, e.g., parking restrictions / a 'school zone' speed limit Monday to Friday at school access and exit times of 15kph / protected kerbs/engineering and other appropriate infrastructural modifications as required.
- o The NTA's impact assessment shows additional traffic flows on Harold's Cross Road during evening peak affecting St Clare's, the Harold's Cross Educate Together National School and Harold's Cross Education Together Secondary School and the same 'school zone' speed treatment is also recommended in the vicinity of these schools.
- We also support the concept of filtered permeability through neighbourhoods, to increase social interactions, facilitate more activity in our public realm (parks, amenities) and maximise the potential for walking and cycling, particularly as 1,600 children and their chaperones access our four local schools that lie within ten minutes from the heart of our road and are used by many families on KRL and in the broader neighbourhood.
- O While the NTA submission on this Bus Corridor to An Bord Pleanála does not reference the broader need for 'push/pull' measures at the micro level, LOKRA submissions have consistently referenced micro-mobility services, park-and-ride and support mechanisms for parents who do not work at home and use cycle and walking trains. Some schools have developed bicycle libraries. Hubs are needed across the community, including at points where parents could congregate, with pooling of responsibility to bring children to the schools, lessening the vehicular burden on roads on which schools are situated. Bleeper bikes and scooter hire points are particularly important in neighbourhoods outside the bus gates.

Public Realm / Urban Design

- LOKRA strongly supports badly needed improvements to Public Realm / Urban Design and placemaking for Kimmage Road Lower; however, we believe that previous plans presented during the consultation phase⁶ have been reduced to appease the business community to the detriment of the permanent residential community
- While the area at Kimmage Road Lower and Sundrive Road crossroads is noted as the 'village centre' in the EIAR report (Ref: 4.5.1.9.1), the public realm enhancements consist of 15 No. Trees with a 'rest area' on which there is no detail. There are no permanent public realm improvements, no raised tables or material changes to designate pedestrian zones, no public furniture, no cycle parking, and no landscaped areas. There are currently several businesses that use the pavement for external dining areas, and this is not supported or enhanced in the scheme.
- o The provision of 52 permit parking spaces within this 'village centre' to allow access to the businesses from 169 199 Lower Kimmage Road is noted within section 6.4.6.1.2.4 Parking and Loading. This is absolutely contrary to the Dublin City Council Development Plan 2022 2028 which has multiple priorities for Urban Villages of which Kimmage is noted as one. In terms of Public Realm, it notes that 'rebalancing space in favour of pedestrians and cyclists will be required to ensure the city centre and the city's urban centres support healthy placemaking'. This is just one example of which providing 52 parking spaces is completely inappropriate. We would also like clarity as to how these publicly accessible parking spaces are to be provided when they are outside of the red-line boundary for the application.
- The Design Manual for Urban Roads and Streets (DMURS) notes that trees are an integral part of street design, with diagrams showing trees to both sides of a carriageway and that 'A traffic calming effect

⁵ https://bit.ly/lokra28

⁶ Appendix 1 - References. #3 Public Realm Progression Drawings:

can also be achieved, where trees are planted in continuous rows and their canopies overhang, at least in part, the vehicular carriageway' This would be an appropriate design response to the 'village centre' and one that was proposed in earlier versions of the proposals, this appears to have been removed to provide the 52 permit parking spaces and we would request it's reinstatement.

- DMURS also notes that 'In general, the provision of street furniture must be considered as part of the overall design of the street.' This does not appear to have been considered in the proposal, and we would request its inclusion.
- o There is no information as to how the little landscaping provided is to be maintained and replaced; we would request that it is taken in charge by Dublin City Council.
- Public realm enhancement remains very limited on the stretch of Kimmage Road Lower beyond Mt.
 Argus Church.
- LOKRA maintains that public realm design, including for the sensitive integration of transport-related infrastructure and furnishings in many historic residential areas and roadways, should reflect and celebrate heritage and identity. We would like to suggest an appropriate artwork at the northwestern arm of Sundrive Cross junction to reflect its evocative Larkfield townland / Sundrive heritage.

EV Charging Infrastructure

The Dublin City Development Plan 2022 – 2028 has a specific policy regarding decarbonisation of transport 'SMT2 - Decarbonising Transport - To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.' There doesn't appear to be any provision for EV charging within the proposed scheme. How does this adhere to the Development Plan policy and the overarching requirements to achieve Ireland's Climate Action Plan and decarbonisation of the country's transport system? We believe that in line with 'Dublin Local Authority Electric Vehicle Charging Strategy' that 'Neighbourhood Charging' for 'Residents without off-street parking', which is noted in the document to be led by the Council and publicly funded, should be provided within the Bus Connects project. Kimmage Road Lower is within the area noted as having a high public charging reliance and rapid hub charging is recommended.

Utilities / Street Lighting

- LOKRA views this process as an opportunity to significantly improve the negative visual impact of overhead wiring the length of KRL. This would give an important aesthetic feel and look to our newly designed road.
- o If street lighting and pavements are to be enhanced under these plans, It would be an ideal time for all the cables that run between streetlights to be sunk underground.
- Evaluation of utilities, etc., should take account of access to water supply necessary to nurture planted trees, etc. Future Proofing should be consistent.

Land Take / CPO

- LOKRA wishes to formally re-state our consistent position, of a lack of support for land take from homes – particularly in the case of this scheme: Gardens No. 33 to 61 and St. Clare's School and the CPO of a private dwelling at Fottrell House offices at Emmett Bridge.
- o It has been our experience with the NTA, that there is usually a less invasive solution or compromise that can be reached to avoid such a final and destructive result

Parking

- LOKRA acknowledges the retention of many parking spaces on KRL. Current on-street residential
 parking is either permit or time restricted due to 'clearways'. We welcome the removal of time
 restrictions in the context of a quiet road treatment on KRL.
- o Some residents have expressed concern about accessing their own off-street parking via permanent and possibly raised busy cycle lanes.

6.4.6.1.2.4 Parking and Loading

• There are currently 22 informal, part-time parking spaces southwest of the R817 Kimmage Road Lower / Sundrive Road Junction, adjacent to the R817 Kimmage Road Lower southbound carriageway. It is proposed to remove a total of six spaces, and to allow full-time use of the remaining 16 spaces. 52 off-street permit parking spaces will be available on the opposite side of the street and most residential properties have off-street parking at the rear. The impact of removing six part-time spaces, balanced against the enhancement to full-time for the remaining 16 spaces, is assessed as having a Negligible

- Off-street / in-garden parking is not an option for several residents on Kimmage Road Lower who can only park on the road, including those as cited above. LOKRA contests the assertion above that 'most residential properties have off-street parking at the rear'. A recent informal survey of these property owners indicated that, while 13/22 homes have large back entrances off a lane, to the best of our knowledge they are used only semi regularly by 4 residents. The reason for this is that, even with a fairly large entrance, there isn't a wide enough turning circle due to the small size of the gardens and the narrow nature of the lane. We would also argue that the narrow nature of the lane egress at the northern end makes it too narrow for regular use and for anything other than very small vehicles.
- The 16 parking spaces proposed as a replacement for the 22 currently available on-street, will need to be supplemented. We note in the statement above that: 52 off- street permit parking spaces will be available on the opposite side of the street. LOKRA would like to see what permit / formal arrangements will be put in place to assure residential parking access for these 22 homes.
- o There are other residents whose homes because of their situation on corners/bends etc, or because of the depth of their frontage would not adequately accommodate private vehicles. Car parking on neighbouring side streets is the only alternative. All residents have sacrificed personal parking expectations and eligibilities to accommodate commuters and public transport services.
- The residents whose homes are directly beside bus gates should be provided with alternative and appropriate parking spaces

Environment

- We cautiously note statements in the Transport Strategy that acknowledge the importance of urban centres (in our case, including an historic village and a protected structure and close proximity to others) being people focussed and not vehicle focussed, including of course, public transport vehicles and the accompanying infrastructure
- The neighbourhood of KRL and Harold's Cross has experienced an increase of population of over twenty-five percent since 2019, sweating small areas of green space and local amenities and creating new vulnerabilities environmentally and to sensitive ecosystems along the Poddle river.
- The Kimmage to City Centre scheme will run closely beside the Poddle river and the proposed 'off line' cycle path is to travel over it at the Stone Boat a protected structure (RMP Duo18-043003) on the river Poddle.
- LOKRA understands that the Kingfisher Project (local multi-award winning environmental and food sustainability project based in Blarney Park allotments), is in on-going discussion with the Poddle Flood Alleviation Scheme (OPW) with a view to 'Daylighting' sections of the Poddle in the area previously culverted. This scheme is due to be delivered in advance of 2028 and it is vital that the NTA / DCC / South Dublin County Council dovetail with this critical planning project for the area before any final decision is made on any form of additional hard infrastructure at this location.

Heritage / Visual Impact:

- o LOKRA has concerns in relation to the Robert Emmet Bridge and strongly advocate a different approach, in view of its sensitive status. Robert Emmet Bridge is listed on the National Inventory of Architectural Heritage and an important visual landmark for Harold's Cross, Clanbrassil Street and the Grand Canal which the current proposal does not respect. As noted in the Environmental Impact Assessment, the Robert Emmet Bridge is protected under Policy CHC4 of the Dublin City Development Plan (DCC 2022) and recognised through inclusion on the NIAH, with part of the original structure remaining. While the proposed development 'wraps around' the bridge, it effectively eliminates it from view.
- The convergence of so much traffic on a single piece of sensitive infrastructure requires a better solution, including one that takes account of pedestrian needs. Prioritised traffic lights for different

- modes of transport would be less invasive and allow for adjustments of modes of transport pending other measures.
- We are strongly concerned for the protection of Harold's Cross Park which is an important thriving cultural amenity as well as a Victorian Park and symbol of the neighbourhood. The removal of the pavement to facilitate greater vehicular traffic could be dangerous given the natural access route for school going children on this route, both for school and for access to the Park.
- Additionally there are concerns for the cluster of protected structures at Mount Jerome (Mount Jerome Cemetery: Mount Jerome House; the mortuary chapel; the gate lodge & it's gates, piers & original railings)
- We advocate that there not be land-take from the private homes on Harold's Cross Road, for the protection of the integrity of streetscape as part of a small development by the Harold's Cross Public Utility Society.
- The plan as submitted to An Bord impacts minimally on the direct architectural heritage of Kimmage Road Lower; the withdrawal of the proposed leisure cycle path through the protected structure of the Church grounds is welcome.

Excessive Car-Dependence:

- LOKRA residents have direct experience that 'an overly car-dependent culture results in congestion, air
 pollution, community severance and unattractive urban environments including poor walking, cycling
 and living' environments as described in the Transport Strategy.
- o LOKRA submissions to the NTA Bus Connects processes, propose a range of short and medium-term solutions including micro-mobility provision adjacent to Bus Corridors, which acknowledge the choice and independence factor for many commuters. Car dependency is reduced by the provision of affordable and accessible choice that meets just transition metrics, but also by a transformative approach to urban villages and environments the acknowledgement of road space as belonging primarily to communities. We believe that there is a missed opportunity in the plans to help future-proof and encourage modal shift within the population.

Park & Ride

- While acknowledging that Park & Ride is not strictly a direct part of this process, it is absolutely critical to the most basic requirement for the success of this project a reduction in car dependant culture and modal shift to public transport. LOKRA supports the assertion in the Transport Strategy, that 'Park & Ride can intercept car trips where people are reliant on private car at an early point in their journey'. Park & Ride must support all Bus Corridors, including Kimmage to City Centre. This is particularly important given the high dependency on cars in the Dublin SW.
- There is a lack of incentivisation for modal shift from cars, electric or otherwise, to other forms of transport. This is reflected in a weak consideration of congestion mitigation and solution measures, the absence of appropriate Bus & Bike Park-and-Ride facilities (at the community level and further afield)
- We note with serious concern that the nearest proposed Bus Park & Ride facility to Dublin South West (Kimmage to City Centre) routes, is at Kill, Co. Kildare. This clearly demonstrates is a lack of imagination and future planning in not trying to capture even some of the 130,000 car journeys travelling several sections of the M50 on an average day. (Ref and link: Til National RoadsNetwork Indicators 2022, Chapter 1, p18)
- To seriously encourage the urgent, essential modal shift and the achievement of reliable public service transport in which all our confidence can be placed, this projects aims (fill in bus reliability / climate / congestion etc), the provision of strategic Bus and bike Park & Ride closer to the M50 and the N81. (eg. at Spawell) is urgently required.
 - Equally across our neighbourhood and in close proximity to all Bus Gates for commuters, there is a need for bleeper bikes, scooters and mobility aids to assist with short-hop tasks. It must be as easy as possible for those who can to choose alternatives to driving.

Enforcement & Signage

- LOKRA suggests that these plans lack sufficient essential detail on implementation and designated responsibility in relation to enforcement of road traffic laws to ensure optimal operation of bus gates and road speeds. Camera enforcement must be balanced against concerns re surveillance / privacy etc.
- o We also propose that to optimise the potential for early commuter route alterations, signage and large-scale public information should be available from a distance on all motorways to and from all exits on the M50 regarding changes to Core Bus Corridors, Bus Gates, Penalties, Park & Ride public transport opportunities and services, and subsequent alternative traffic distribution arrangements.
- o There will also be a requirement to rationalise signage the length of KRL that would become redundant (eg. timed cycle lanes / clearway signs etc.)

Modelling & Analysis

- o It is very difficult to assess the impact on / of individual corridors in isolation. While there is a great deal of available information, cumulative impact data modelling has not been shared.
- O LOKRA notes concerns of residents for personal access, egress and mobility because of the failure to provide accessible traffic distribution data modelling, taking account of the impact of the range of Bus Corridors across our neighbourhood. As noted in our 2019 submission to this process, without access to comprehensive data modelling, it is difficult for us to draw definitive conclusions as to the collective impact of the three Core Bus Corridors in the immediate vicinity. This underscores the need for the strongest possible commitment to monitoring with priority given to the direct impact on households and residents directly impacted by the designation of a Bus Corridor, including acknowledgement on the value of their home.

Monitoring and on-going Community Engagement:

- o At all stages of our interactions with the NTA, they assured us of on-going iterative monitoring of the scheme once implemented and engagement with communities. We note however, the lack of this commitment or any form of schedule or programme in the documentation provided and request ABP to ensure such a process is put in place before signing off on the scheme.
- LOKRA advocates for systematic and programmed review of impacts on communities such as ours for the implementation of the scheme. This needs to be routine and accountable to the communities impacted directly by the scheme. Amendments have to be consulted on with proper respect for the living communities, not just the greater commuter demand.
- o Residents remain cautious about the enforcement and operation of Bus Gates and the direct impact for access and egress from our homes and arising from reduced access, on the value of our homes. For this reason, and to support and protect our community's legacy for the future, we strongly request that An Bord recommend that implementation be monitored with direct engagement with and accountability to, the impacted households.
- O LOKRA noted previously a hierarchy for impact within previous Environmental Impact Assessment reports, wherein residents were not highly rated. We believe this to be profoundly unjust as we must live with the consequences of such decisions. Monitoring should be continuous, and reporting with opportunities for consultation (at least annualy), transparent and consequential, with criteria to be mutually agreed under an independent Chair. This might be done across the breadth of Bus Connects as a substantial change for the city, but should allow for nuanced decisions for each residential community.

Aarhus Convention and the Primacy of Business over Community:

o The Directive 2003/35/EC of the European Parliament and of the Council provides for the community to express opinions and concerns in relation to decisions which impact them. LOKRA engaged thoroughly with the NTA at every possible opportunity, conducted research and engaged consistently as a community with the many difficult issues involved in consideration of the Kimmage to City Centre Bus Corridor Scheme and to a lesser extent related corridors. As a Residents' Association we sought

- every opportunity to provide factual and accurate information directly to each other and via our website.
- The pandemic impacted on engagement. A reliance on web based information was difficult for many of our residents and required a good deal of work by all of us to try to ensure that there were opportunities to identify and consider concerns.
- o In implementing Bus Connects, both route changes and Core Bus Corridors, the provision of local information cannot be the responsibility of volunteers within Residents' Associations. Public information should be local, consistent, quality assured, accessible and periodically reviewed to safeguard as best possible, against misrepresentation.
- We do not have cumulative traffic data modelling. Accordingly, we believe that the only fair way to address this 'unknown' is to continue to work in partnership and to monitor with care, respecting our need for access and egress, and the value of our homes for which we work.
- We emphasize that residents, not the business community nor commuters, are the life-blood of a neighbourhood. We drive the charitable initiatives that take care of each other, the Festivals that promote pride of place and protect our biodiversity. When the lights go off at night, we are still at home, listening to the commuting buses and traffic.

Summary:

- O While the current proposals are not without concerns, there is broad support for benefits as they are currently perceived. We yield some on-road parking, consider acceptance of compromised, altered access and egress with a strong recommendation for ongoing monitoring of impacts, and the potential now for a vastly enhanced bus service, without road widening. In return our neighbours on some roads will share portions of redistributed vehicular traffic which residents on Kimmage Road Lower have borne for decades and which in current volumes and speeds is no longer sustainable.
- o KRL is proposed under Bus Connects to become part of a high-frequency public transport service route, which will predominantly service commuters from outside our neighbourhood. KRL has long suffered from being perceived primarily as a 'through road' rather than the vibrant living, breathing local community it is. Public transport systems and infrastructure must respect and be part of the change in this perception and not exacerbate it.
- o While the LOKRA community broadly, if cautiously, support these Bus Connects proposals, the NTA proposal in the Transport Strategy, for a significantly increased bus capacity fleet (bi-articulated buses up to 25 metres long), transitioning to LUAS in the medium term, potentially along the Kimmage to City Centre scheme raises a number of significant concerns. We wish to formally note that we are responding to this bus connects proposal and not signing a 'blank cheque' as transportation corridor, including for light rail and other potential developments signalled in the Transport Strategy. published subsequent to the open consultation on this proposal. Any attempt to implement such changes would be in breach of the Directive 2003/35/EC (Arhus Convention).

Errors Identified

- 1) Right of way notices at Derravaragh Road and Poddle Park notified to An Bord Pleanala by LOKRA and an extension granted on this consultation process⁷
- 2) Discrepancy in the indicated bus gate timings at Ravensdale Park between the original General Arrangement Drawings (Volume 1) published on the website and a more recent update former indicates 24 hrs Mon to Sun and latter 06.00 to 10.00 & 14.00 to 20.00 Mon to Sun⁸.
- 3) Resident car parking spaces to rear of 176-220: It is not true to say that: 'most residential properties have off-street parking at the rear'. While 13/22 homes have garage style back gates onto the rear lane of these houses, to the best of our knowledge only 4 can use this for semi-regular vehicular parking due to the very narrow and tight nature of the lane and small back garden space.
- 4) On page 6 of the "02.-General-Arrangement-Drawings" document it states that there is an existing shelter at stop 2440. There is not.

⁷ Appendix 1 - References. #4 Corrib Rd & Poddle Pk Notices

⁸ Appendix 1 - References. #5 General Arrangement Drawings – V1 2023

Appendices

Appendix 1 - References.

1. Kimmage-CBC-Public-Consultation-Report, Page 493

Kimmage to City Centre / Core Bus Corridor Scheme

Appendix

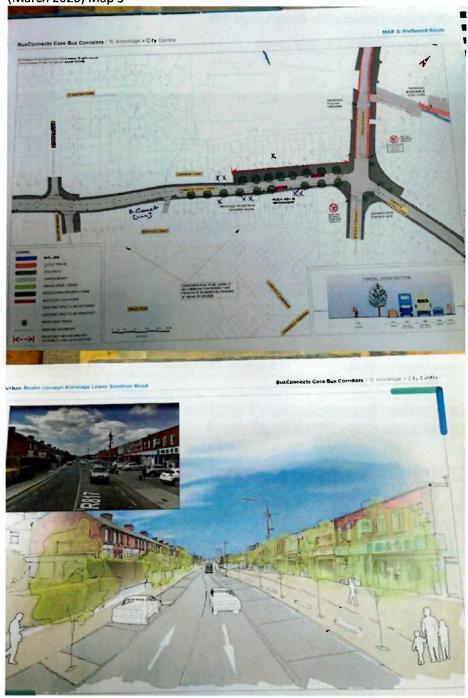
Residents Group	Scheme	Date of Meeting
LOKRA	Kimmage to City Centre	02/04/2019
LOKRA	Kimmage to City Centre	15/04/2019
LOKRA	Kimmage to City Centre	16/07/2019
LOKRA	Kimmage to City Centre	20/09/2019
LOKRA	Kimmage to City Centre	11/12/2019
LOKRA	Kimmage to City Centre	22/10/2020
Kîmmage & Crumlin Representatives	Kimmage to City Centre	10/12/2020
LOKRA	Kimmage to City Centre	25/03/2021
Stannaway Road Residents	Kimmage to City Centre	14/06/2021
Kimmage Business Group & Residents	Kimmage to City Centre	21/06/2021
Dorset Street Business Group	Swords to City Centre	22/11/2021

2. https://busconnects.ie/wp-content/uploads/2022/03/busconnects-pc3-community-forum-



3. Public Realm Progression Drawings:

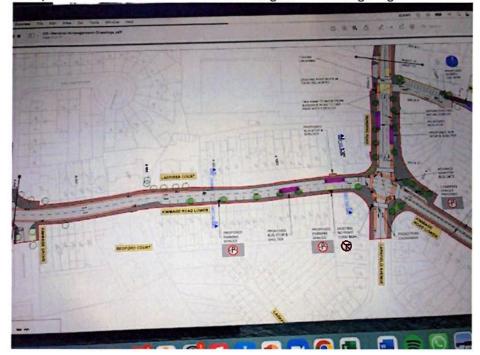
A - Kimmage to City Centre Core Bus Corridor 11 Preferred Route Public Consultation Brochure (March 2020) Map 3



B - https://busconnects.ie/wp-content/uploads/2022/03/busconnects-pc3-community-forum-presentation-kimmage-10-nov-2020-rev-a.pdf, Page 6



C – Latest plan ref: EIAR Volume 1 – General Arrangement Drawings Page 7



4. Corrib Rd & Poddle Pk Notices

Image at Corrib Rd 14th August 2023







Image at Poddle Park 14th August 2023



Image at Poddle Park 28th August 2023



5. General Arrangement Drawings – V1 2023, Page 8



Appendix 2 – Signatures

The following 15 sheets contain the signatures of 191 local residents.



I wish to acknowledge my full support for the attached LOKRA submission to An Bord Meanala on the Bus Connects Kimmage to City Centre Scheme

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I wish to acknowledge my full support for the attached LOKRA submission to An Bord Pleanala on the Bus Connects Kimmage to City Centre Scheme.

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I wish to acknowledge my full support for the attached LOKRA submission to an Bord Pleanala on the Bus Connects Kimmage to Oty Centre Scheme.

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I wish to acknowledge my full support for the attached LDICRR submission to As Bord Pleanala on the Bus Connects Kimmage to City Centre Scheme.



I wish to acknowledge my full support for the attached LOKRA submission to An Bord Pleanila on the Bus Connects Kimmage to Oity Centre Scheme.

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I wish to acknowledge my full support for the attached LOKRA submission to An Bard Pleanala on the Bus Connects Kimmage to City Centre Scheme.

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