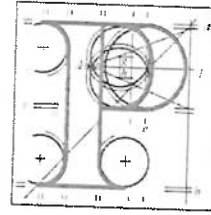


**Our Case Number:** ABP-317660-23



**An  
Bord  
Pleanála**

Mount Drummond District Resident's Association  
c/o Gerry Soden  
23 Darley Street  
Harold's Cross  
Dublin 6

**Date:** 03 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](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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64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Mount Drummond District Residents' Association  
23 Darley Street  
Harold's Cross  
Dublin 6

An Bord Pleanála (Strategic Infrastructure Division)  
64 Marlborough Street  
Dublin 1  
D01 V902

**An Bord Pleanála Ref: Kimmage to City Centre Core Bus Corridor Scheme Submission**

## Contents

<b>1. Executive Summary</b> .....	<b>2</b>
<b>2. Introduction</b> .....	<b>2</b>
<b>3. Description of the Rat-Run</b> .....	<b>3</b>
<b>3.1. North to East:</b> .....	<b>3</b>
<b>3.2. East to South:</b> .....	<b>3</b>
<b>3.3. West to South:</b> .....	<b>3</b>
<b>3.4. West to North:</b> .....	<b>3</b>
<b>3.5. North to West:</b> .....	<b>4</b>
<b>4. Potential Impact of the Proposed Scheme on the usage of the Rat-Run</b> .....	<b>4</b>
<b>5. Impact on the community of increased traffic</b> .....	<b>4</b>
<b>5.1. Safety</b> .....	<b>4</b>
<b>5.2. Congestion</b> .....	<b>4</b>
<b>5.3. Air Quality</b> .....	<b>5</b>
<b>6. Request to ABP to review the traffic impact modelling</b> .....	<b>5</b>
<b>7. Request to ABP to include monitoring of the traffic impact</b> .....	<b>5</b>
<b>8. Request to ABP to specify the organisation responsible for addressing any impacts</b> .....	<b>5</b>
<b>9. "Yellow Box" at junction of Armstrong Street and Harold's Cross Road</b> .....	<b>5</b>

## **1. Executive Summary**

The Mount Drummond District Residents' Association (MDDRA) are concerned about the potential for increased traffic in the community as a result of the Kimmage Bus Connects Scheme. We request An Bord Pleanála to:

1. Confirm the proposed introduction of a right-turn filter light at Harold's Cross Bridge for traffic turning from Parnell Road onto Harold's Cross Road (Section 4).
2. Review the traffic impact modelling to ensure it has adequately considered the use of our community as a rat-run and the frequency of use of the illegal right turn from O'Hara Avenue to Grove Road (Section 6).
3. Require monitoring of the traffic impact on our community before and after the introduction of the proposed restriction on the right-turn at Harold's Cross Bridge from Harold's Cross Road to Grove Road (Section 7).
4. Include a requirement to address any negative impacts promptly as a condition of the scheme and to specify which organisation is responsible (Section 8).
5. Retain and expand the yellow box at the junction of Armstrong Street and Harold's Cross Road. (Section 9)

## **2. Introduction**

The Mount Drummond District Residents' Association (MDDRA) wish to make the following observations on the Kimmage to City Centre Core Bus Corridor Scheme.

The MDDRA is open to all residents in the following streets in Harold's Cross, Dublin 6:

- Mount Drummond Avenue, Mount Drummond Square (Mount Drummond).
- Armstrong Street, Ashworth Place, Darley Street, Drummond Place, Fitzgerald Street, Greenfield Place, Grove Avenue, O'Hara Avenue, St. Clare Terrace (The Streets)
- Harold's Cross Cottages, Emmet Street, Le Vere Terrace (The Cottages)
- Portion of Harold's Cross Road from Harold's Cross Bridge to St. Clare's School.
- Portion of Grove Road from Harold's Cross Bridge to Grove Avenue.

The district includes over 500 houses with approximately 1000 residents. The MDDRA Committee Members and Officers are elected annually at the AGM.

The Kimmage to City Centre Core Bus Corridor Scheme will be on the perimeter of our District on Harold's Cross Road. The MDDRA recognise that this is an important scheme for the future of Dublin City and accept it will inevitably impact our Community. However, we are concerned that one significant impact on our District, the rat-run between Harold's Cross Road and Grove Road, has not been adequately considered in the planning documents. We request An Bord Pleanála ensure the impact of the rat-run is properly considered and measures to reduce the impact on our Community are included in the conditions of the scheme.

### **3. Description of the Rat-Run**

The rat-run begins at the junction of Harold's Cross Road and Mount Drummond Avenue where traffic can enter and exit our district. Traffic travels along Mount Drummond Avenue and turns left onto Darley Street. Traffic continues straight along Harold's Cross Cottages and O'Hara Avenue to exit our district at the junction with Grove Road. The rat-run is used in both directions for the following reasons:

#### **3.1. North to East:**

Traffic travelling north along Harold's Cross Road who wish to travel east along Grove Road can currently turn right at Harold's Cross Bridge with a filter light in operation at times, including during morning rush hour. When traffic is backed up on Harold's Cross Road, to reduce time, some drivers choose instead to turn right onto Mount Drummond Avenue and follow the rat-run to O'Hara Avenue where they then make an illegal right turn onto Grove Road. There is a no-right-turn sign at O'Hara Avenue however, traffic on Grove Road is often moving slowly in both directions and facilitates the illegal turn with no horns sounding.

*Current usage:* Unknown. We are concerned that usage will increase significantly following removal of the right turn at Harold's Cross Bridge under the Bus Connects scheme.

#### **3.2. East to South:**

Traffic travelling east along Parnell Road who wish to travel south along Harold's Cross Road can turn right from Parnell Road at Harold's Cross Bridge. There is current no filter light to facilitate the right hand turn and, as a result, traffic wishing to turn right can build up and have to wait for two or more traffic light sequences to turn right. To reduce time, some drivers choose to proceed east through Harold's Cross Bridge to Grove Road and then turn right onto O'Hara Avenue and follow the rat-run to Harold's Cross Road.

*Current usage:* In use throughout the day.

#### **3.3. West to South:**

Traffic travelling west along Grove Road who wish to travel south along Harold's Cross Road can turn left from Grove Road at Harold's Cross Bridge. When traffic is backed up on Grove Road, to reduce time, some drivers choose instead to turn left onto O'Hara Avenue and follow the rat-run to Harold's Cross Road.

*Current usage:* In use throughout the day with higher usage in afternoon/evening rush hour when traffic is usually backed up on Grove Road.

#### **3.4. West to North:**

Traffic travelling west along Grove Road who wish to travel north along Clanbrassil Street cannot legally turn right from Grove Road at Harold's Cross Bridge because of no-right-turn signage. While some cars make this illegal right turn, they disrupt other traffic and there are many horns sounding. Drivers can instead turn left onto O'Hara Avenue and follow the rat-run to Harold's Cross Road where they can turn right and proceed north to Clanbrassil Street.

*Current usage:* Unknown.

### **3.5. North to West:**

Traffic travelling north along Harold's Cross Road who wish to travel west along Parnell Road can turn left at Harold's Cross Bridge. Where traffic is backed up on Harold's Cross Road, to reduce time, some drivers choose instead to turn right onto Mount Drummond Avenue and follow the rat-run to O'Hara Avenue where they then turn left onto Grove Road.

*Current usage:* Unknown.

## **4. Potential Impact of the Proposed Scheme on the usage of the Rat-Run**

The proposed scheme includes removing the current right hand turn at Harold's Cross Bridge for traffic travelling north along Harold's Cross Road who wish to travel east on Grove Road. The MDDRA are concerned that this will significantly increase the amount of traffic using the North to East rat-run described in paragraph 3.1. The bulk of this submission expands on those concerns.

The proposed scheme includes the addition of a right-turn-filter-light at Harold's Cross Bridge for traffic travelling east along Parnell Road who wish to travel south on Harold's Cross Road. This may reduce the amount of traffic using the East to South rat-run described in paragraph 3.2. The MDDRA support this change and request ABP to ensure it remains in the proposed scheme.

## **5. Impact on the community of increased traffic**

### **5.1. Safety**

The rat-run route of Darley Street, Harold's Cross Cottages and O'Hara Avenue are narrow streets with on-street disc parking on one or both sides leaving sufficient width for one vehicle only to travel. Where two vehicles meet each other, one must pull in to let the other pass. The houses have no front gardens with front doors opening onto a narrow footpath leading to a risk of children and other vulnerable residents stepping onto the road within 2 steps of leaving their house. In addition to the junctions with Mount Drummond Avenue and Grove Road, there are four other junctions on the rat-run route. These four junctions have no stop signs or other safety signage. The MDDRA has observed that residents drive slowly to allow for children and other vulnerable residents; pets; the many cyclists who travel through the community; traffic at the unmarked junctions; and cars pulling into and out of narrow on-street parking. The MDDRA has also observed that many drivers using the rat-run travel much faster than the residents do leading to a safety risk. Councillor Mary Freehill raised these safety concerns with Dublin City Council on a number of occasions along with a request for stop signs at the junctions. The request was denied. Any increase in traffic from the proposed bus connects scheme will increase these safety risks.

### **5.2. Congestion**

An increase in traffic could lead to traffic congestion in the area, particularly if traffic queues along the rat-run route in order to turn right or left from O'Hara Avenue onto Grove Road. As O'Hara Avenue is wide enough for one car only, any queuing will prevent/delay traffic turning from Grove Road onto O'Hara Avenue thus impacting residents trying to enter the community. Queuing along the rat-run route will impact residents entering and exiting streets who have a junction with the rat-run, two of which are cul-de-sacs. Queuing along the rat-run route will also delay residents pulling into and out of narrow on-street parking.

### **5.3. Air Quality**

Increased traffic, traffic congestion and, in particular, queuing traffic will reduce air quality in the community. Because the streets have no gardens, exhaust fumes of queuing traffic will be only a few metres from the doors and windows of residents. This will increase the level of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> inhaled, all of which have immediate impacts on health.

### **6. Request to ABP to review the traffic impact modelling**

The Environmental Impact Assessment Report includes a model of traffic impact. (EIAR Chapter 6, Figure 6.26). This shows no increase in traffic in our community. While we hope the reality matches the model, the MDDRA are concerned that the current use of the area as a rat-run was not included in the model and we request the ABP to review this. The MDDRA are also concerned the frequency of current use of the illegal right turn from O'Hara Avenue to Grove Road is not included in the model. While there are no-right-turn signs, we have never witnessed enforcement and vehicles make this illegal right turn frequently. Vehicles include those belonging to residents, visitors to the district and those using it as a rat-run.

### **7. Request to ABP to include monitoring of the traffic impact**

The MDDRA request ABP to include a condition to monitor the impact on our community of removing the right-turn at Harold's Cross Bridge from Harold's Cross Road to Grove Road. We respectfully suggest that this include monitoring the traffic movements on O'Hara Avenue for at least 6 months before the removal of the right-turn and for at least 6 months after, in addition to a video camera to record compliance with the right-turn restriction from O'Hara Avenue to Grove Road.

### **8. Request to ABP to specify the organisation responsible for addressing any impacts**

The MDDRA of course hope that there will be no increase in traffic in our community as a result of the proposed scheme. However, should a negative impact occur, we would like it to be addressed quickly and we would like the MDDRA to be consulted. We sent queries in preparation for this submission and were told by the NTA that Dublin City Council would be responsible and were told by two Dublin City Councillors that the NTA would be responsible. We request ABP to include a requirement to address any negative impacts promptly as a condition of the scheme and to specify which organisation is responsible.

### **9. "Yellow Box" at junction of Armstrong Street and Harold's Cross Road**

Increasing the extent to the Yellow Box from its current position further south would enable more residential cars to exit Armstrong Street turning right towards Harold's Cross Bridge and the city centre.

Yours faithfully



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Gerry Soden

Chair Mount Drummond District Residents Association