Our Case Number: ABP-317660-23

Your Reference: The General Cemetery Company Of Dublin



Waterman Moylan
Consulting Engineers Limited
Block S
East Point Business Park
Alfie Byrne Road
Dublin 3
D03H3F4

Date: 04 December 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.

Email

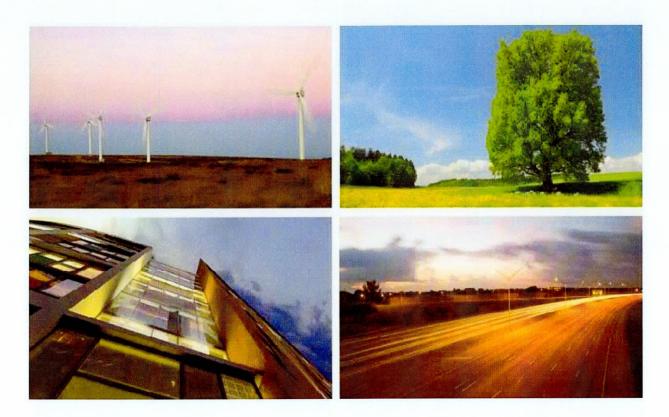
Yours faithfully,

Eirhear Reilly Executive Officer

Direct Line: 01-8737184

HA02A





Kimmage to City Centre Core Bus Corridor Scheme

Submission to An Bord Pleanala on behalf of Mount Jerome Cemetery and Crematorium, Harolds Cross, Dublin 6

November 2023

Waterman Moylan Consulting Engineers Limited

Block S, East Point Business Park, Alfie Byrne Road, Dublin D03 H3F4 www.waterman-moylan.ie





Client Name:

General Cemetery Co

Document Reference:

12-038r.003

Project Number:

12-038

Quality Assurance - Approval Status

This document has been prepared and checked in accordance with Waterman Group's IMS (BS EN ISO 9001: 2008, BS EN ISO 14001: 2004 and BS OHSAS 18001:2007)

Issue

Date

Prepared by

Checked by

Approved by

Issue 1

14 November 2023

B McCann

J Gibbons

Comments



Disclaimer

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We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above.

This report is confidential to the Client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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1. Introduction

1.1 Introduction

This submission has been prepared by Waterman Moylan on behalf of the General Cemetery Company in response to an application by Bus Connects to An Bord Pleanala on 27th July 2023 for a proposed road development consisting of the Kimmage to City Centre Core Bus Corridor Scheme.

The submission relates primarily to the proposal for the three bus gates proposed on Kimmage Road Lower which will sever the primary access route for funeral corteges to the cremation and burial facilities at Mount Jerome Cemetery and Crematorium.

1.2 Location

Mount Jerome Cemetery and Crematorium are located in Harolds Cross, Dublin 6W at the location shown in Figure 1.

Access to Mount Jerome is off Kimmage Road Lower on which three bus gates are proposed between Ravensdale Park and Harolds Cross Park.

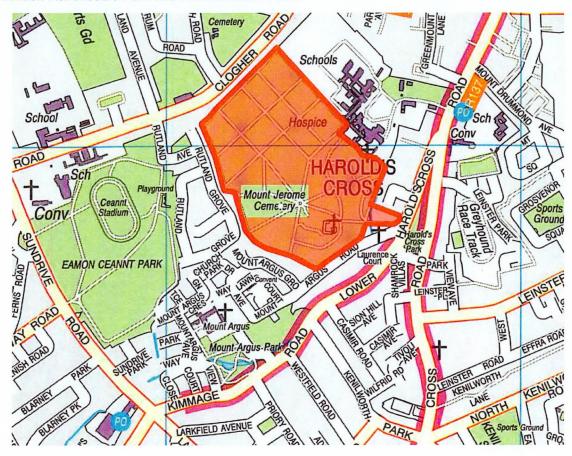


Figure 1 Location Map

1.3 Mount Jerome Cemetery

Mount Jerome Cemetery was established by the General Cemetery Company of Dublin Act 1834 and opened in 1836 as a burial ground of 26 acres. The land area was extended over a period of some years to its present-day size of 47 acres with direct access from Harold's Cross Road.

During the nineteenth and early twentieth centuries, the Cemetery became the main south side burial place for members of the Protestant faith. As a result, the cemetery contains a variety of the finest Victorian memorials, tombs, vaults, and crypts in Ireland from this time period.

From the 1920's onwards, Catholic burials were received. Over the Cemetery's 187-year history, there have been almost 220,000 burials Catholic burials roughly equal to the number of Protestant burials.

However, due to declining burial numbers in the 1970's, the condition of the Cemetery began to deteriorate as revenues fell. In 1984, it was put into voluntary liquidation. By the late 1990's, it had fallen into a serious state of neglect with large swathes of the cemetery covered in overgrowth and resulting security issues.

But with new owners in 1998 and the opening of a crematorium at Mount Jerome in 2000, revenues have recovered, and the Cemetery has undergone a complete reversal of fortune. The ongoing funds provided by the Crematorium have afforded the Cemetery the means to put in place a proper maintenance program to prevent it falling into decline again.

Cremation facilities within the cemetery include three chapels for the receiving of remains for services, the most modern and environmentally friendly cremator in Ireland, public and disabled toilets, and offices.

Mount Jerome is the most modern and popular Cemetery and Crematorium in Ireland. It currently receives 3,000 remains annually for cremation and burial being an average of 10 funerals per day over 300 days per year. Mount Jerome also receives 200,000 visitors annually.

Due to the nature of funerals, mourners travel to the church, crematorium or cemetery by limousine, car or taxi. Travel by public transport or by bicycle is very much a minority mode.

Funerals arrive by appointment between 10.00 and 16.00 with peak arrivals of up to 16 corteges per day. Cars conveying mourners park both within and without the Cemetery. See Figure 2.

Very often, the drivers of mourners' cars tend not to act rationally when attempting to keep up with the progress of a funeral cortege. It is quite regular for them to block up the Harold's Cross Road outside the main gates and granite pillars of Mount Jerome.

Quiet and busy periods at the entrance to Mount Jerome are illustrated in are illustrated in Figures 3, 4 and 5. With up to 16 funerals per day, the busy periods between 11.00 and 16.00 are significantly longer than the quiet periods before 11.00 and after 16.00.

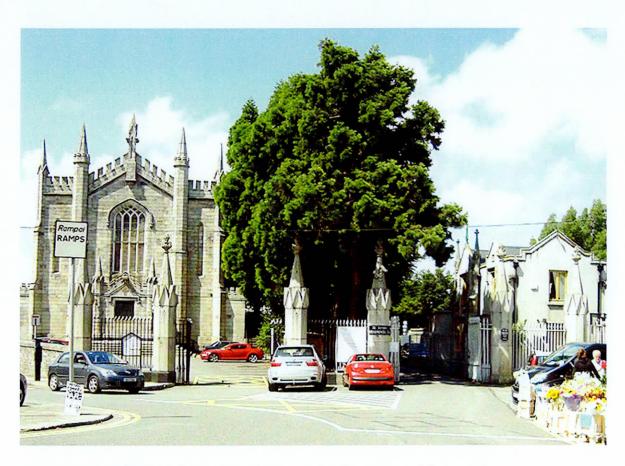


Figure 2 Entrance to Mount Jerome Cemetery and Crematorium



Figure 3 Quiet Time At Entrance to Mount Jerome Cemetery and Crematorium



Figure 4 Funeral Cortege Arriving at Mount Jerome Cemetery and Crematorium



Figure 5 Busy Time at the Entrance to Mount Jerome Cemetery and Crematorium

2. Buc Connects

2.1 Description

The Bus Connects project comprises a series of 15 radial corridors on which bus transport and cycling are to be prioritised. Five of the corridors are located in the southwest quadrant of Dublin city as listed in Table 1 and illustrated in Figure 6.

The priority measures along these corridors include a series of bus gates which Bus Connects define as 'a sign-posted short length of stand-alone bus lane. This short length of road is restricted exclusively to buses, taxis and cyclists plus emergency vehicles. It facilitates bus priority by removing general through traffic along the overall road where the bus gate is located. General traffic will be directed by signage to divert away to other roads before they arrive at the bus gate.'

Table 1 Bus Corridors

No	Corridor	Application To An Bord Pleanala	Bus Gates
8	Clondalkin to City Centre	4 th May 2023	6 x bus gates
9	Greenhills to City Centre		2 x bus gates
10	Tallaght to City Centre	4 th May 2023	6 x bus gates
11	Kimmage to City Centre	27 th July 2023	4 x bus gates
12	Rathfarnham to City Centre	8 th June 2023	2 x bus gates



Figure 6 Location Map for Bus Corridors

2.2 Bus Gates along Corridors 8 - 12

The various bus gates proposed along Corridors 8 - 12 are set out in Table 2 together with the operating restrictions for general traffic and the operating hours.

The total number of bus gates is 20 of which 6 are common to the Clondalkin and Tallaght corridors.

The locations of eight of the proposed bus gates close to Mount Jerome Cemetery and Crematorium are illustrated on Figure 7.

A number of different operating times are proposed for these bus gates including

- 6am to 8pm (northbound)
- 6am to 8pm
- 6am to 10am and 4pm to 8pm
- 24 hours (southbound)
- 24 hours (inbound and outbound)

In summary, there is no single operating time proposed for the various bus gates and it would suggest that the operating times were selected by Bus Connects to suit the locations of the individual gates.

Table 2 Proposed Bus Gates on Corridors 8 - 12

No	Corridor	Location	Hours of Operation
8	Clondalkin	Belgard Square West between Belgard Square South and Old Blessington Road	24 hours (inbound and outbound)
		Belgard Square West between Old Blessington Road and access to Broadfield Hall	24 hours (inbound and outbound)
		Belgard Square East between Belgrave square North and access to ABB Belgard Road	24 hours (inbound and outbound)
		Existing bus gate retained on Blessington Road at TUD access.	24 hours (inbound and outbound)
		Old Greenhills Road at junction with Greenhills Road and Bancroft Park	24 hours (inbound and outbound)
		Clogher Road at junction with Sundrive Road	24 hours (inbound and outbound)
9	Greenhills	Greenhills Road south of Birch Avenue and Treepark Road	24 hours

			(inbound and outbound)
		Kildare Road and Clonard	24 hours
		Road	(inbound and outbound)
10	T-11	Belgard Square West between	24 hours
10	Tallaght	Belgard Square South and Old Blessington Road	(inbound and outbound)
		Belgard Square West between	24 hours
		Old Blessington Road and access to Broadfield Hall	(inbound and outbound)
		Belgard Square East between	24 hours
		Belgrave square North and access to ABB Belgard Road	(inbound and outbound)
		Existing bus gate retained on	24 hours
		Blessington Road at TUD	(inbound and outbound)
		access.	(Inboding and outboding)
		Old Greenhills Road at junction with Greenhills Road and Bancroft Park	24 hours
			(inbound and outbound)
		Clogher Road at junction with Sundrive Road	24 hours
			(inbound and outbound)
11	Kimmage	Kimmage Road Lower, just north of the Ravensdale Park Junction	6am to 10am and 4pm to 8pm 7 days a week (both directions
		Kimmage Road Lower, just south of Harold's Cross Park	24-hours
		Harolds Cross Road, at the	24 hours (southbound)
		northern end of Harold's Cross Park	6am to 10am (northbound)
		Harold's Cross Road and Kenilworth Park junction	24-hour
	Rathfarnham .	Rathmines Road Lower at the junction with Lissenfield	6am-to 8pm
12			
12	Natilialilialil	junction with Lissenfield	7 days a week
12	Naumanmam	Templeogue Road at the junction with Fergus Road	7 days a week 6am-to 8pm

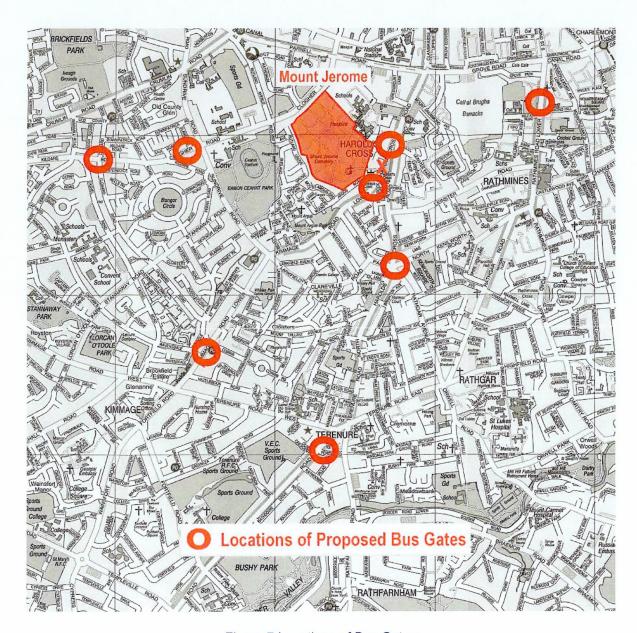


Figure 7 Locations of Bus Gates

2.3 Bus Gates along Kimmage Road Lower

The locations and layouts of the three bus gates along Kimmage Road Lower and Harolds Cross Road are shown in Figures 8, 9 and 10 reproduced from the General Arrangement drawings for the Kimmage to City Centre Core Bus Corridor Scheme.

The proposed operating hours are 6-10 am and 4-8 pm at Ravensdale Park and 24 hours at both gates at Harolds Cross Park.

The proposed bus gate at the northern end of Harolds Cross Park also includes a no left turn for traffic exiting Mount Jerome onto Harolds Cross Road See Figure 9.

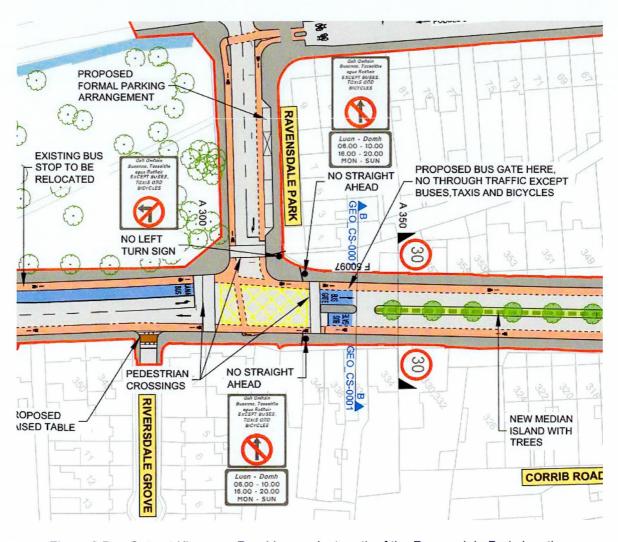


Figure 8 Bus Gate at Kimmage Road Lower, just north of the Ravensdale Park Junction. (Extract from General Arrangement Drawing No 1)

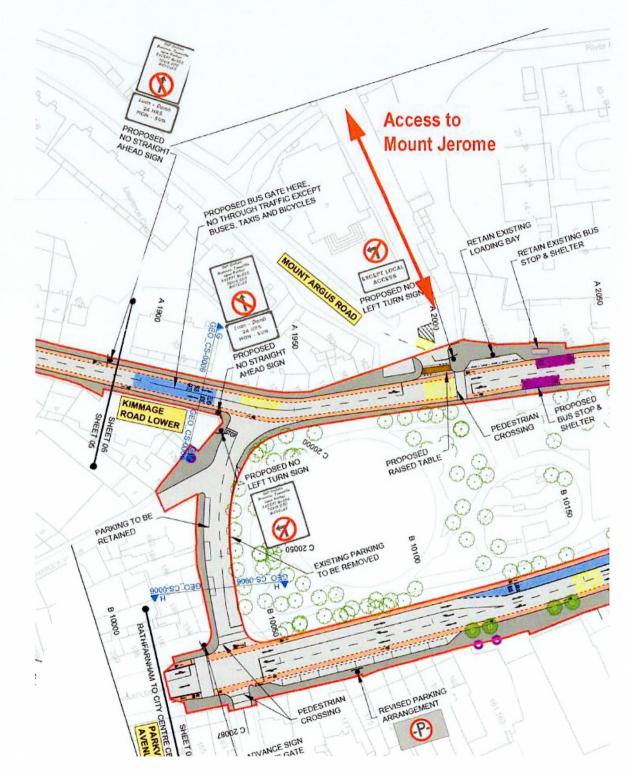


Figure 9 Bus Gate at Kimmage Road Lower, just south of Harolds Cross Park (Extract from General Arrangement Drawings No 5 and 6)

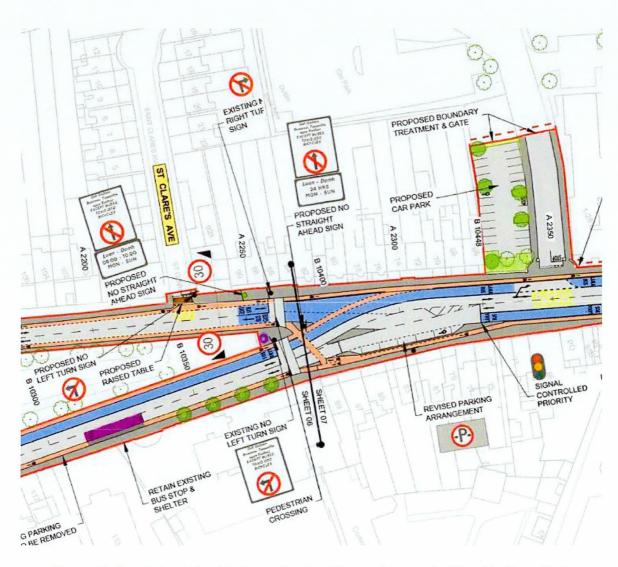


Figure 10 Bus Gate at Harolds Cross Road , at the northern end of Harolds Cross Park (Extract from General Arrangement Drawings No 6 and 7)

3. Routes to Mount Jerome Cemetery and Crematorium

3.1 Introduction

For the purpose of this submission and with a view to highlighting the impact of the proposed bus gates on Mount Jerome Cemetery and Crematorium, churches in the catchment area of Mount Jerome were selected and the routes for funeral corteges from these churches to the cremation and burial facilities at Mount Jerome were reviewed.

3.2 The Routes

Travel routes for funeral corteges travelling from the nine churches listed below to Mount Jerome Cemetery and Crematorium are presented in Figures 11 – 20.

- Church of St Therese, Mount Merrion
- Church of the Holy Spirit, Ballyroan
- Church of the Sacred Heart, Donnybrook
- · Church of the Three Patrons, Rathgar
- · Holy Cross Church, Dundrum
- St Agnes Church, Crumlin Village
- St Marys Priory, Tallaght
- · St Bernadette's Church, Clogher Road
- St Matthews Church, Ballyfermot
- Whitefriar Street Church, Aungier Street, Dublin 2

From Figures 11 - 19, it will be seen that a significant number of the ten routes from the various churches to Mount Jerome will be impacted by the proposed bus gates. A number of the routes will be severed requiring detours to get to Mount Jerome.

However, a potentially more serious issue is the local impact of the two bus gates proposed on Kimmage Road Lower and Harolds Cross Road at Harolds Cross Park on either side of the entrance to Mount Jerome.

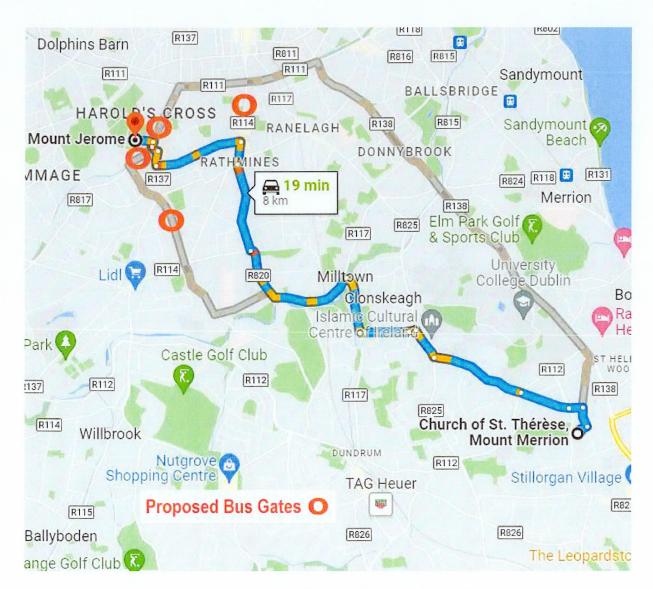


Figure 11 Church of St Therese, Mount Merrion to Mount Jerome



Figure 12 Church of the Holy Spirit, Ballyroan to Mount Jerome



Figure 13 Church of the Sacred Heart, Donnybrook to Mount Jerome

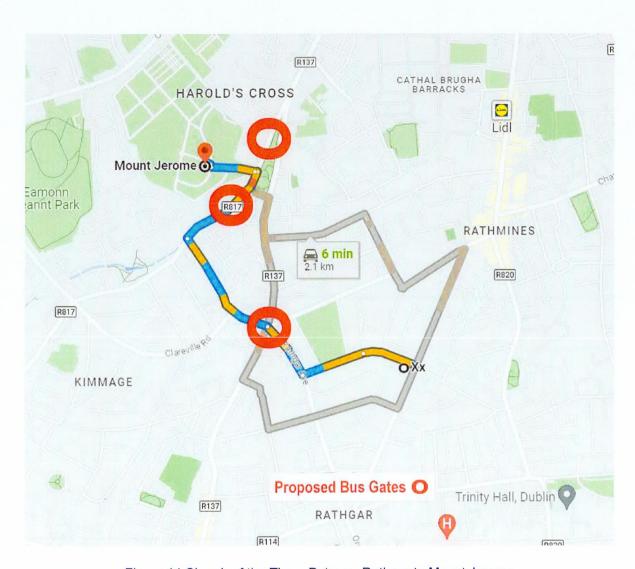


Figure 14 Church of the Three Patrons, Rathgar to Mount Jerome

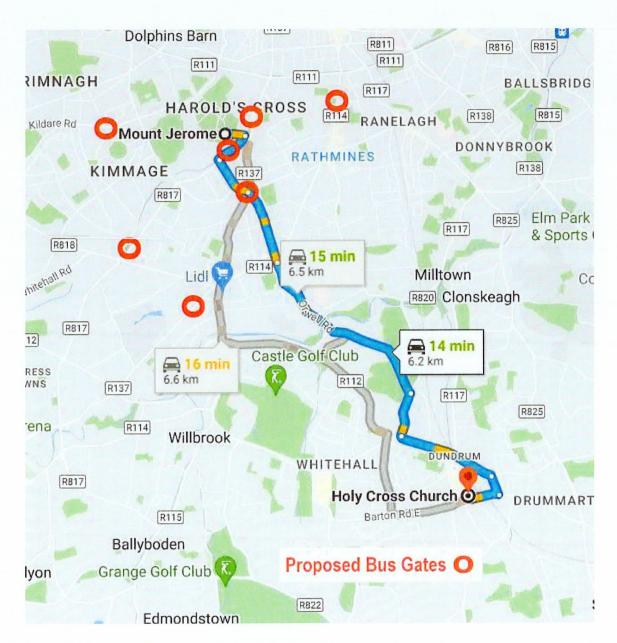


Figure 15 Holy Cross Church, Dundrum to Mount Jerome

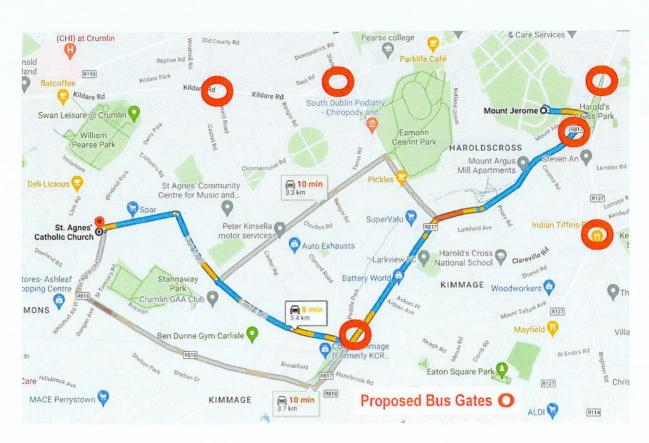


Figure 16 St Agnes Church, Crumlin Village to Mount Jerome

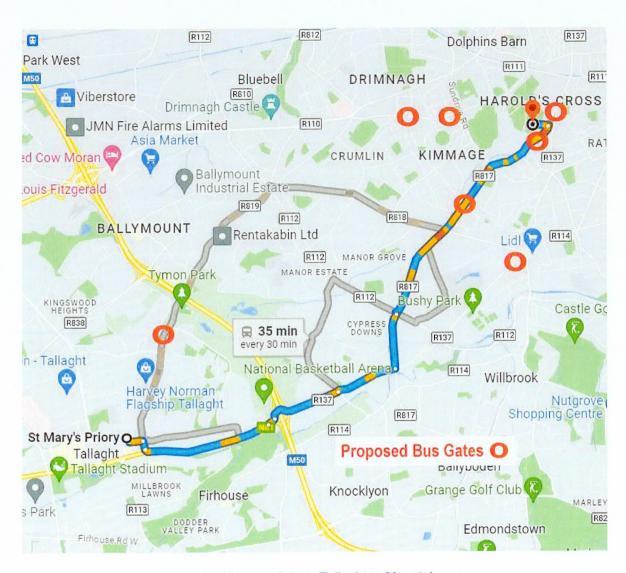


Figure 17 St Marys Priory, Tallaght to Mount Jerome

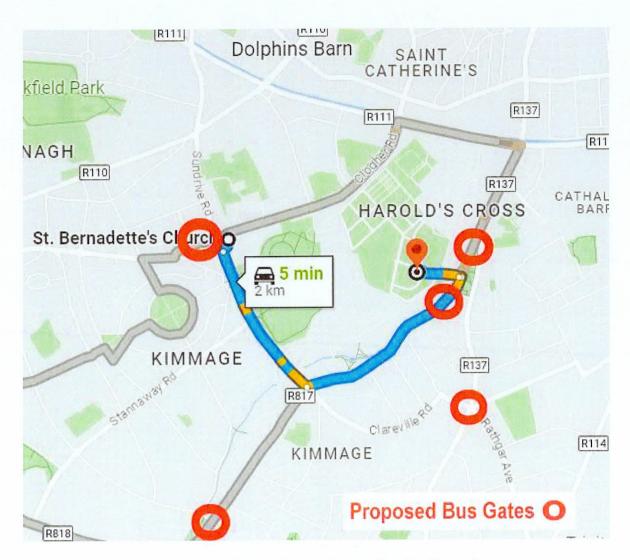


Figure 18 St Bernadette's Church, Clogher Road to Mount Jerome

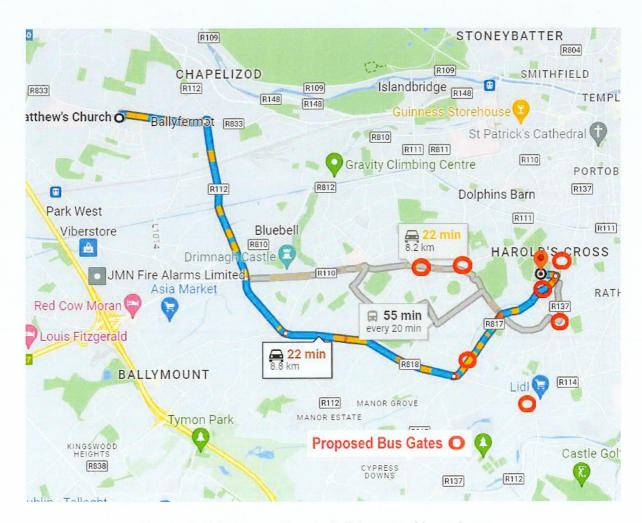


Figure 19 St Matthews Church, Ballyfermot to Mount Jerome

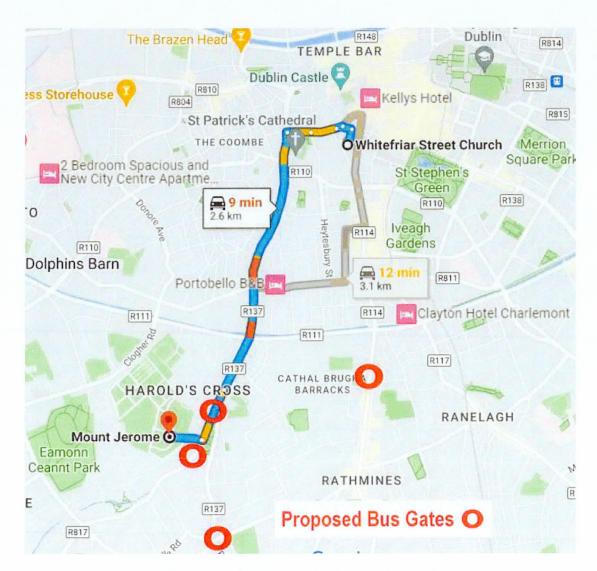


Figure 20 Whitefriar Street Church to Mount Jerome

4. Local Access to Mount Jerome

4.1 Options for Access

All of the routes shown in Figures 11 - 19 converge together on the streets in front of the entrance to Mount Jerome as shown in Figure 21.

- Route 1: Traffic from the north via R137 Harolds Cross Road.
- Route 2:Traffic from the east via the R137 and the short western section of the Harold's Cross Road (No's 182 to 190) that circumvents Harold' Cross Park.
- Route 3:Traffic from the south via R817 Kimmage Road Lower

If the Kimmage Bus Corridor is approved, both Routes 1 and 3 will be severed by bus gates leaving Route 2 as the only access for funerals and mourners to Mount Jerome.

The impacts of this severance on the day to day operation of the Cemetery and Crematorium are addressed below.

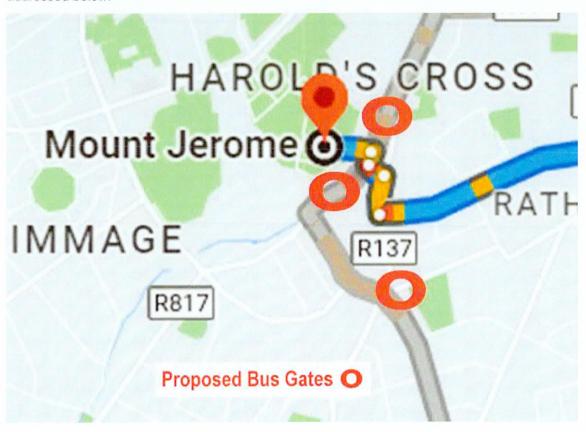


Figure 21 Local Access to Mount Jerome

4.2 Review of Bus Corridor Proposal

There are four operational bus gates proposed as part of the Kimmage to City Centre Core Bus Corridor Scheme. Two would be located on Kimmage Road Lower and two on Harolds Cross Road. All would be operational on 7 days a week. See Table 2.

The first of these is proposed to be located on Kimmage Road Lower to the north of the junction with Ravensdale Park with operational hours of 6am – 10am and 4pm to 8pm.

The second is proposed to be located where the Kimmage Road Lower joins the Harold's Cross Road just to the south of the entrance to Mount Jerome. This bus gate would have operational hours of 24 hours in both directions.

The third is proposed to be located on the Harold's Cross Road on the north side of the Harold's Cross Park just to the north of the entrance to Mount Jerome. This bus gate would have operational hours of 24 hours (southbound) and 6am to 10am (northbound).

These three proposed bus gates would only permit access for buses, taxis and cyclists along the length of Kimmage Road Lower from Ravensdale Park all the way to Mount Jerome and along the northern section of Harold's Cross Road that circumvents Harold's Cross Park.

However, these two main roads account for 70% of the daily inbound and outbound flow of cortege traffic and visitors in and out of Mount Jerome.

If these three bus gates are to be operational as proposed in Table 2, there would be severely reduced access for funeral traffic and visitors to Mount Jerome as the number of access routes to Mount Jerome would be reduced from three to just one.

The result would be 100% of the Mount Jerome traffic being funnelled onto the short western section of the Harold's Cross Road (No's 182 to 190) that circumvents Harold' Cross Park.

The two proposed bus gates on Kimmage Road Lower and one on Harolds Cross Road would cause regular gridlock for lengthy time periods along the entire length of the Harold's Cross Road that circumvents all around Harold's Cross Park.

This gridlock would be compounded by the other factors described below:

4.3 Local Factors

Firstly, the main gates and the granite pillars framing the access to Mount Jerome are only wide enough for one vehicle at a time. As a result, it is necessary for the operators of Mount Jerome to provide continuous traffic management at this location. In addition, the gateway is listed for preservation in the Dublin City Development Plan.

Secondly, the drivers of mourners' cars tend not to act rationally when attempting to keep up with the progress of a funeral cortege. It is quite regular for them to block up the Harold's Cross Road outside the main gates and granite pillars of Mount Jerome.

Thirdly, funeral traffic to Mount Jerome occurs from 10.00 to 16.00, Monday to Saturday. However, this funeral traffic flow does not occur in an evenly fashion. More of pronounced peaks and troughs occur especially between the busy periods of 11.00 to 16.00.

Fourthly, if both of the bus gates to the north and south of the cemetery entrance were to be implemented and become operational, inbound and outbound traffic at Mount Jerome would have to negotiate two T-junctions before gaining access to the southern section of Harold's Cross Road that circumvents Harold's Cross Park.

Finally, the proposed no right turn from Harold's Cross Road onto the Grand Canal at Grove Road would ensure the vast majority of outbound Mount Jerome traffic would have to turn right at the T-junction where the short western section of Harold's Cross Road meets the southern section of Harold's Cross Road. This could lead to significant delays and congestion as outbound traffic exits Mount Jerome onto the public road network.

The resultant gridlock would be especially pronounced for the short section of the Harold's Cross Road that runs along the western side of the Harold's Cross Park (No's 182 to 190) and for the northern section of Harold's Cross Road that runs in front of Mount Jerome.

4.4 Local Impact of Bus Corridor Proposal

The current proposals to locate bus gates immediately to the north and south of the entrance to Mount Jerome without any mitigating factors would inevitably lead to local gridlock as funeral corteges and mourners attempt to negotiate the short link between Kimmage Road Lower and Harolds Cross Road both on the way into the Cemetery and on the way back out.

The results of this gridlock would be

- (a): Significant time delays for buses using this section of the proposed Kimmage to City Centre Core Bus Corridor. Any time gains elsewhere could be lost at Mount Jerome for lengthy time periods between 11.00 and 16.00, Monday to Saturday. Such would be self-defeating to the objectives of the Kimmage Bus Corridor.
- (b) Inexcusable added extra distress and anguish for bereaved families and mourners severely delayed trying to access Mount Jerome to pay their final goodbyes to their loved ones.
- (c) Severe delays to emergency vehicles trying to negotiate this resultant gridlock. It is quite conceivable that people could needlessly die in the Harold's Cross area because of undue delays for emergency vehicles.
- (d) The future long-term closure of the Cemetery and Crematorium as bereaved families would choose more easily accessible cemeteries and crematoria in the Dublin area.

Submission on mitigation measures to address these issues are set out in the next section.

5. Mitigation Measures

5.1 Operational Objectives

If the overall operation of the road network in the Mount Jerome area is to be optimised for all users, it is essential that public transport services are not delayed and that traffic moves freely in and out of Mount Jerome.

If however, traffic management measures such as bus gates implemented for the assistance of public transport and cyclists have the unintended effect of causing delays and congestion at the entrance to Mount Jerome, then neither objective will have been achieved.

If on the other hand, traffic entering and leaving Mount Jerome causes delays to public transport services, then measures are required minimise any such delays.

5.2 Options for Mitigation

The two options below are put forward for consideration with the twin objectives of ensuring that the Kimmage to City Centre Bus Corridor Scheme achieves its primary function of moving people during peak traffic periods while allowing Mount Jerome Cemetery and Crematorium to maintain its long-established culture and tradition of serving families and mourners at their most sensitive and vulnerable.

The two options for consideration are

Option 1:

Omit the two bus gates proposed on Kimmage Road Lower and Harolds Cross Road at the northern and southern ends of Harold's Cross Park thereby facilitating access to Mount Jerome along Harold's Cross Road from both directions. At the same time, the proposed ban on left turns for traffic exiting Mount Jerome onto Harolds Cross Road would also be omitted.

Option 2

Reduce the operational hours for the two bus gates proposed on Kimmage Road Lower and Harolds Cross Road at the northern and southern ends of Harold's Cross Park from 24 hours per day to the peak hours of 6am – 10am and 4pm – 8pm in line with the proposed operating hours for the bus gate on Kimmage Road Lower, just north of the Ravensdale Park Junction. See Table 2 and Figures 8-10.

At the same time, the operating time for the proposed left turn for traffic exiting Mount Jerome onto Harolds Cross Road would be restricted to apply only during the operational hours for the bus gates from 6am - 10am and 4pm - 8pm.

6. Summary

The submission relates primarily to the proposal for the three bus gates proposed on Kimmage Road Lower and Harolds Cross Road which will sever the primary access route for the 3,000 funeral corteges and 200,000 visitors who travel each year to the cremation and burial facilities at Mount Jerome Cemetery and Crematorium.

Mount Jerome Cemetery and Crematorium are located in Harolds Cross, Dublin 6W with access off Kimmage Road Lower and Harolds Cross Road on which three bus gates are proposed between Ravensdale Park and Harolds Cross Park.

Mount Jerome is the most modern and popular Cemetery and Crematorium in Ireland. It currently receives an average of 10 funerals and 650 mourners / visitors per day over 300 days per year. Due to the nature of funerals, mourners travel to the church, crematorium or cemetery by limousine, car or taxi. Travel by public transport or by bicycle is very much a minority mode.

Funerals arrive by appointment between 10.00 and 16.00 with peak arrivals of up to 16 corteges per day. Cars conveying mourners park both within and without the Cemetery.

The Bus Connects project comprises a series of 15 radial corridors on which bus transport and cycling are to be prioritised. Five of the corridors with twenty bus gates are located in the southwest quadrant of Dublin city.

For the purpose of this submission and with a view to highlighting the impact of the proposed bus gates on Mount Jerome Cemetery and Crematorium, churches in the catchment area of Mount Jerome were selected and the routes for funeral corteges from these churches to the cremation and burial facilities at Mount Jerome were reviewed. The review concluded that that a significant number of the nine routes from the various churches to Mount Jerome will be impacted by the proposed bus gates including two of the three local access routes in the immediate vicinity of Mount Jerome.

If the overall operation of the road network in the Mount Jerome area is to be optimised for all users, it is essential that public transport services are not delayed and that traffic moves freely in and out of Mount Jerome. If however, traffic management measures such as bus gates implemented for the assistance of public transport and cyclists have the unintended effect of causing delays and congestion at the entrance to Mount Jerome, then neither objective will have been achieved. If on the other hand, traffic entering and leaving Mount Jerome causes delays to public transport services, then measures are required minimise any such delays.

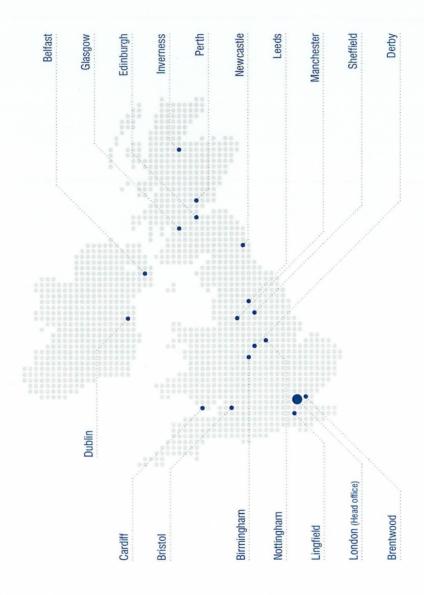
It is submitted that the optimum solution to achieving both objectives would be to omit the two bus gates proposed on Kimmage Road Lower and Harolds Cross Road at the northern and southern ends of Harold's Cross Park. The proposed ban on left turns for traffic exiting Mount Jerome onto Harolds Cross Road would also be omitted.

Alternatively, reduce the operational hours for the two bus gates proposed on Kimmage Road Lower and Harolds Cross Road at the northern and southern ends of Harold's Cross Park from 24 hours per day to the peak hours of 6am – 10am and 4pm – 8pm in line with the proposed operating hours for the bus gate on Kimmage Road Lower, just north of the Ravensdale Park Junction.

The operating time for the proposed ban on left turns for traffic exiting Mount Jerome onto Harolds Cross Road would also be amended to apply only during the operational hours of 6am - 10am and 4pm - 8pm for the proposed bus gates.

If the proposals for the Kimmage to City Centre Core Bus Corridor are approved as proposed without alterations to take account of access to Mount Jerome Cemetery and Crematorium, an unintended and unwelcome outcome would be delays to bus services in the area of Mount Jerome arising from congestion and delays to funeral corteges and mourners brought about by the restrictions imposed by bus gates on Kimmage Road Lower and Harolds Cross Road at the northern and southern end of Harolds Cross Park.

UK and Ireland Office Locations



Project Number: 12-038 Document Reference: 12-038r.003