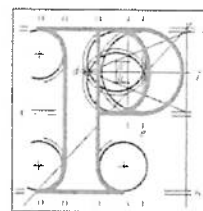


**Our Case Number:** ABP-317660-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

The Harold's Cross Village Community Council  
c/o Dr. Paula Russell  
31 Westfield Road  
Harold's Cross

**Date:** 20 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.

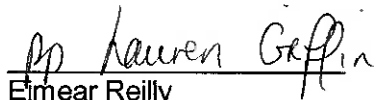
If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

<b>Teil</b>	<b>Tel</b>	(01) 858 8100
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
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Yours faithfully,



Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02A

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## **Harold's Cross Village Community Council CLG**

31 Westfield Road, Harold's Cross, Dublin 6W, D6W K27

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

8 December 2023

**RE: SUBMISSION TO AN BORD PLEANÁLA – TO CITY CENTRE CORE BUS CORRIDOR  
HA 29N: 317660**

Dear Sir Madam,

The Harold's Cross Village Community Council would like to make the following submission on the Kimmage City Centre Core Bus Corridor which impacts on our local area. The HCVCC an umbrella organisation which has delegates from the following residents' associations.

- Clareville Road Residents' Association
- Parnell Road / Greenmount Lane Residents' Association
- Kenilworth Park Residents' Association
- Harold's Cross Road Residents' Association
- Harold's Cross Business Association
- Lower Kimmage Road Residents' Association
- Mount Argus and Church Park Residents' Association
- Mount Drummond and District Residents' Association
- Westfield Road Residents' Association
- Wilfrid and Casimir Residents' Association.

The HCVCC Would like to lodge a submission to the Strategic Infrastructure Division on the Kimmage to City Centre Core Bus Corridor Scheme which is part of the Bus Connects project.

We trust An Bord Pleanála will give due consideration to the points raised in this submission and will take these on board in the decision making on this Bus Corridor.

Yours sincerely

*Paula Russell*

Dr. Paula Russell  
188 Harold's Cross Road  
Harold's Cross  
D6W T622

On Behalf of  
The Harold's Cross Village Community Council CLG  
31 Westfield Road, Harold's Cross, Dublin 6W, D6W K27



**Harold's Cross Village Community Council CLG**  
 31 Westfield Road, Harold's Cross, Dublin 6W, D6W K27

**Submission by Harold's Cross Village Community Council on the Kimmage to City Centre Core Bus Corridor Scheme HA 29N: 317660**

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## **(1) Introduction**

The HCVCC an umbrella organisation which has delegates from the following residents' associations.

- Clareville Road Residents' Association
- Parnell Road / Greenmount Lane Residents' Association
- Kenilworth Park Residents' Association
- Harold's Cross Road Residents' Association
- Harold's Cross Business Association
- Lower Kimmage Road Residents' Association
- Mount Argus and Church Park Residents' Association
- Mount Drummond and District Residents' Association
- Westfield Road Residents' Association
- Wilfrid and Casimir Residents' Association.

The HCVCC support the development of more user friendly and environmentally friendly transport solutions including better infrastructure for the active travel modes of cycling and walking together with improved provision of public transport such as low emission buses, Luas, and in the future Metro.

While this submission relates to Route from Kimmage to the City Centre we believe that it is imperative that it is considered in conjunction with the Templeogue/Rathfarnham to City Centre application which was lodged earlier this year. As both of these applications have implications for the village and surrounding residential areas of Harold's Cross. We trust An Bord Pleanála will give due consideration to the points raised in this submission and will take these on board in the decision making on this Bus Corridor.

The HCVCC are cognizant that in order to implement a major infrastructural project such as Bus Connects that there will be differing impacts on various parts of the corridor. We are aware individual roads within an area will experience different challenges, as traffic management measures induce changes. Individual residents' groups within Harold's Cross have specific concerns, which they will raise in their own submissions on the Kimmage to City Centre Core Bus corridor. We reflect many of these in this current submission and highlight a number of key concerns related to the proposals presented under the following headings:

- (1) Impacts of Bus Priority/Bus Gates.**
- (2) Displacement/Distribution of traffic.**
- (3) Pedestrian Facilities**
- (4) Cycling infrastructure**
- (5) Schools and Traffic Calming**
- (6) Public Realm**
- (7) The CPO of Private Open Space**
- (8) Heritage**
- (9) Ongoing Monitoring and Engagement**

## **(2) Impacts of Bus Priority/Bus Gates**

### **2.1 Bus Priority/Bus Gates Kimmage to City Centre**

The introduction of Bus Gates will have a number of benefits in terms of the prioritisation of public transport and the ability to increase the frequency of buses and increase the speed and predictability of journey times by bus through Harold's Cross. The HCVCC recognises that to encourage a modal shift this type of change is required. We welcome the provision of a dedicated bus route, and the introduction of a Bus Gates at Ravensdale Road and at the southern end of Harold's Cross Park (McGowans) pub on Lower Kimmage Road lower with the attendant Improvement in the reduction of private vehicular traffic, along this route of Lower Kimmage Road. As the bus gate at the southern end of Harold's Cross Park (McGowans pub) will operate 24 hours there will be little traffic other than buses southbound on this route.

The result of the restrictions imposed by the bus gates will however, have an impact on traffic levels on other roads throughout Harold's Cross. North bound (city bound) traffic from Kimmage will now travel along Larkfield Avenue, Larkfield Park and Clareville Road, making a right turn into the upper parts of Kenilworth Park and on to Harold's Cross Road, to travel northwards along R137 Harold's Cross Road. There is a need to ensure some traffic calming measures along this route particularly in the vicinity of the two primary Schools on Clareville Road, on what will be an increasingly trafficked route. See section 4 below.

Giving the likely increase in traffic volumes along this route the bicycle stand on Clareville Road, close to that junction should be relocated in order to allow space for a second lane facilitating traffic turning left into Kenilworth Park.

The second bus gate at the northern end of Harold's Cross park (Siopa Linn), has more limited operational times as pointed out in the EIAR Vol 2 Chapter 4 :

*The proposed Bus Gate at the northern end of Harold's Cross Park will only operate in the northbound direction during the morning peak period from 6am to 10am, 7 days a week. This will prevent traffic from circumventing any peak period traffic queue on R137 Harold's Cross Road. At all other times this Bus Gate will be open for general traffic, which will suit exit movements from funerals at Mount Jerome Cemetery in particular, as well as for the local residents (EIAR, Chp 4 p 29).*

However, the text and the drawings are unclear and do not correspond. The text above does not seem to match the drawing on Sheet no 6 of the General Arrangement drawings no BCIDD-ROT-GEO\_GA-0011\_XX\_00-DR-CR-0006 where a bus gate is shown in markings on both sides of the carriageway, north and southbound.

Furthermore, the signage indicated on drawing on Sheet no 7 states that the bus gate towards the south along the western side of Harold's Cross Park will operate 24 hours. This ties in with the text on pg. 27 of Vol 2 Chp. 4 EIAR. Which states *Southbound traffic on R137*

*Harold's Cross Road will not be permitted to turn right into R817 Kimmage Road Lower at the northern end of Harold's Cross Park.* This means that this southbound carriageway is defacto a 24 hour bus gate.

Our understanding is that no traffic (other than buses, taxis and bicycles) travelling south bound on Harold's Cross Road can turn right onto the southbound carriageway of (Kimmage Road Lower/Harold's Cross Road<sup>1</sup>) at the northern end of the park. Thus the text in the EIAR should have been clear that the bus gate at the north End of the park – for the southbound carriageway operates on a 24 hour basis.

Signage alerting drivers to this effect is needed at the southern end of Harold's park to alert traffic heading north (towards the city) in the morning peak that they will not be able to utilise the linking road across the top of the park as they are prohibited during this time from either turning left at Mc Gowans (Bus Gate 2A), or turning right towards the Mount Jerome and on to the Siopa Linn bus gate(Bus Gate 2B). Although there is an indication on Map 6 (drawing BCIDD-ROT-GEO\_GA-0011\_XX\_00-DR-CR-0006) of a sign giving advance warning of the bus gates– detail will be required.

## **2.2 Interaction with effects of Templeogue Rathfarnham to City Centre Corridor including bus gates in Rathmines**

The impacts of increased traffic on Harold's Cross road is likely to be exacerbated by the changes that are proposed on the Templeogue/Rathfarnham to City Centre corridor<sup>2</sup>.

The introduction of the bus gates in Rathmines for example, is likely to have an impact on traffic on a number of roads running through Harold's Cross, as traffic is displaced. Lower Rathmines Road will be closed to through traffic in both directions with a Bus Gate from 6am-8pm between the entrance to St. Mary's and Lissenfield. This will mean that Leinster Road is likely to become a more trafficked route, as car traffic will be channelled into Leinster Road from Rathmines Road lower. This traffic will then utilise Harold's Cross Road as a key artery into the city.

Traffic coming from the city towards Rathmines, is also likely to utilise Leinster Road more frequently as in the absence of a direct route to Rathmines from the canal via Lower Rathmines road, car traffic will be compelled to use either the later Clanbrassil Street/Emmet Bridge route out of the city, or the earlier Ranelagh/Charlemont St. Bridge route.

As a right turn will now be permitted (currently banned) from Leinster Road on to Rathmines Road, car traffic travelling out of the city wishing to access Rathmines Road or upper Rathmines Road is likely to utilise Emmet Bridge/Harold's Cross road, turn right to travel along Leinster Road and make another right turn at bottom of Leinster road. Resulting in a greater volume of traffic utilising Harold's Cross road as a result.

---

<sup>1</sup> The road to the West of Harold's Cross Park although officially the R817 Lower Kimmage Road the addresses of all of the buildings on this stretch of road are addressed as Harold's Cross Road.

<sup>2</sup> While we understand that these are issues that apply to the Templeogue Rathfarnham Corridor which is the subject of another SID application we raise our concerns here because of the inevitable interaction between both proposals.



All of these changes are likely to have a significant impact on Harold's Cross Road leading to increasing volumes of traffic along this route.

**2.2.1 Bus Gate Harold's Cross Road from Kenilworth Cross Roads (5 way junction) to Top of Harold's Cross Park**

The changes to the junction at Kenilworth Cross Roads will also have an impact on Harold's Cross road and surroundings. A right turn at Kenilworth Cross Roads from Harold's Cross Road onto Kenilworth Park for outward traffic will now be permitted. The impact of changes to this junction will have particular implications for Kenilworth Park, which will be subject to much greater volumes of traffic as it becomes a key intersection for traffic that will be channelled along Clareville Road, Larkfield Ave, and Larkfield Park.

In addition at the Kenilworth crossroads, a bus gate at Kenilworth Square North will mean that it is closed outbound to all traffic save for buses. This will have implications for traffic coming from Rathgar and Rathmines into Harold's Cross, with the likelihood of greater traffic on alternative routes along Kenilworth Square North and Rathgar Avenue and along Leinster Road.

**2.3 Displacement/Distribution of Traffic**

Given the impacts of the introduction of the aforementioned bus gates and bus priority, we are concerned that the traffic along Harold's Cross Road, which is an already heavily trafficked route will be severely impacted by these changes, without real discernible improvements to the buses on this route.

This is borne out in the data included in the EIAR Chapter 6 Traffic and Transport that both Harold's Cross Road and other roads in Harold's Cross will experience an Increase of at least +100 Combined Flows at PM Peak Hour. The following extract from Table 6.53 of the EIAR Vol 2 is illustrative of this:

**Extract from Table 6-53: Road Links that Experience an Increase of at least +100 Combined Flows (Indirect study area, PM Peak Hour)**

Road Name	Do Minimum Flows	Do Something Flows	Flow Difference
Harold's Cross Road	953	1206	253
Kenilworth Park	719	970	251
Clareville Road	668	933	265
Adrian Avenue	642	820	179
Larkfield Park	636	831	195
Larkfield Avenue	854	1127	273

EIAR Vol. 2 Chap. 6, P 97

There are implications from such traffic on the quality of environment in the commercial centre of Harold's Cross Village and the surrounding residential roads, with potential negative impacts, for pedestrian activity and livability.

We would like An Bord Pleanála to request some further detailed modelling of the potential flows of traffic in and around Harold's Cross due to the interaction of the 4 bus gates on this corridor and to model the operation and impacts of funeral traffic accessing Mount Jerome around Harold's Cross park.

To mitigate some of the effects of the increased vehicular traffic volumes we would like to see a much greater investment in public realm improvement works (see section 6 below) which might counteract the myriad negative effects of increased vehicular traffic along Harold's Cross Road, Kenilworth Road, Clareville Road and Larkfield Avenue and Larkfield Park. We suggest that An Bord Pleanála, should include conditions to this effect in any decision on the project and request the NTA to include further public realm improvements.

#### **2.4 Reinstatement of Morning Peak no Left Turn restriction from Sundrive Road onto Kimmage Road Lower**

We are concerned that a former mitigating element of the traffic management on the corridor has been removed in the final documentation. A morning peak no left turn restriction onto Kimmage Road Lower from Sundrive road which was included in the 3<sup>rd</sup> round of public consultation in Nov. 2020 has been removed. This is particularly concerning for residents living on Kenilworth park and Westfield Road who believe that traffic will be displaced along their narrow residential roads if this mitigating measure is not included and therefore we would strongly recommend its reinstatement.

#### **2.5 Impact of the introduction of No Left Turn onto Grove Road from Harold's Cross Road**

We are concerned that the removal of the current right hand turn at Harold's Cross Bridge for traffic travelling north along Harold's Cross Road wishing to travel east on Grove Road, will significantly increase the amount of traffic using an existing north to east rat-run through the Mount Drummond Neighbourhood.

The rat-run begins at the junction of Harold's Cross Road and Mount Drummond Avenue. 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 at the junction with Grove Road making an illegal right turn onto Grove Road. The rat-run is used in both directions and already results in safety and congestion issues in the Mount Drummond neighbourhood.

In the absence of the right turn at Harold's Cross Bridge we are concerned that usage will increase significantly. We would ask An Bord Pleanála to seek additional traffic models of potential traffic displacement and use of this rat run and illegal turn.

### **(3) Pedestrian Facilities**

#### **3.1 Footpaths**

HCVCC welcomes the commitment to the widening of footpath widths to 2m or wider throughout the corridor and also welcome the proposed provision of more pedestrian friendly junctions.

### **3.2 Crossing Points**

We welcome the introduction of a new a signal controlled crossing at the junction at the top of Harold's Cross Park with Harold's Cross Road (opposite Parkview Avenue), and the introduction of a crossing at St. Clare's School.

We note that a previous planning permission has been granted for the introduction of a pedestrian crossing at McGowan's pub, at the same point as the proposed Bus Gate, as part of school's traffic management plan included in the planning permission for the new Educate Together Schools in Harold's Cross. As these schools now cater for approx. 400 students we would like to see this pedestrian crossing implemented as a matter of urgency.

In addition to the new crossings provided in the plans we would like to see consideration given to number of additional crossing provided along Kimmage Road Lower. (i) Between Kimmage Court/Tesco and Sundrive Cross, (ii) Between Kenilworth Park and Westfield Road. There are a number of pedestrian generators in this area that would merit such a crossing Mill Apartments, Mount Argus Church, Scout Hall and St. Gladys Nursing home.

### **3.3 Removal of Public Footpath and Apron at Harold's Cross Park**

The removal of the public footpath along the Southern edge of Harold's Cross park together with the attendant loss in the apron of public space at the entrance to Harold's Cross Park, is a particularly retrograde step, in relation to both the pedestrian environment and the wider public realm.

We believe the impact of the removal of pedestrian space is a significant loss, and one which will impact on the community as a whole and on the setting of the park itself. We have a number of concerns regarding this change:

- (i) No tree survey has been undertaken and no arborist's report has been done for the 7 no. trees within the park that will be affected by this change from path to road carriage.
- (ii) The impact of this change has not been included in the visual impact Assessment. The removal of the path will change the public realm and visual amenity of the park – making it an island, left somewhat stranded in the surrounding roads. Harold's cross park has already lost the footpath to east of the park, and this would remove an important pedestrian route on the south side of the park.
- (iii) More than 50% of the catchment area for the Educate Together Schools is located to the West of the Park reaching as far as the M50. Consequently pupils resident in this area arriving by bus will use the footpaths at Southern end of the Park to walk to and from the schools. The Travel Plan anticipates that schools will have 1,400 pupils and 99 staff by 2029.

The removal of the footpath to the South of Harold's Cross Park along Harold's Cross Road will compromise the pedestrian comfort for people entering and existing the park. The reduction of space at the main entrance will now result in pedestrians having a reduced landing space. Generally Pedestrian circulation is now been forced through a park which is not desirable especially at quite times of the day or at times of darkness with the associated lack of natural surveillance. It is also likely the mature trees along with the historic railings will be

compromised. Unfortunately, pedestrian comfort and safety is being reduced in order to facilitate greater vehicle movement in what is a urban village setting. We would not advocate that the parking spaces on the opposite side are removed as there is no further available parking for residents of these dwellings. We would recommend that the road is retained as is.

#### **(4) Schools and Traffic Calming**

The increased vehicular traffic along Clareville road and well as on Harold's Cross Road will have implications for (Harold's Cross National School, Scoil Mológa and Naoínra) on Clareville Road and, St Clare's National school, the Harold's Cross Educate Together National School and Harold's Cross Education Together Secondary School on Harold's Cross. The approved traffic calming measures in the planning permission for the 1,400 pupil ETS schools at the Greyhound Stadium are not shown and we would draw An Bord Pleanála's attention to these. City Council has recently (November 30<sup>th</sup> 2023) completed a consultation for the introduction of School Zones on Harold's Cross Road. These will need to be reflected in the bus connects plan.

Consideration should be given to reducing the speed limits in conjunction with these school zones along Harold's Cross road to 30 KPH, to reinforce that there is a need for traffic to slow given the number of students accessing these three schools.

On Clareville Road a school zone has already been introduced, outside Harold's Cross National School and Scoil Mológa and Naoínra. A reduced speed limit zone should also be considered here. As this is not a national primary route we consider that a lesser speed limit could be considered on this road at school access times, perhaps a zone of 15 KPH.

#### **(5) Cycling**

HCVCC welcomes the intention to provide enhanced cycle facilities along this corridor and along the Templeogue/ Rathfarnham corridor. We are hugely supportive of the introduction of a continuous cycle lane along the Harold's Cross road and along the Lower Kimmage Road.

##### **5.1 Cyclist Safety**

The introduction of the bus gates on Lower Kimmage Road will, we hope improve safety along this route and will increase cycling. However, elsewhere in Harold's Cross road traffic is likely to increase and we are concerned that the volumes of vehicular traffic on the Harold's Cross Road will have implications for cyclist safety along this route.

Given the existing level of congestion on Harold's Cross road, and likely increased traffic volume (as mentioned above) we are concerned that this cycle lane will remain sub-standard from a cyclists' perspective.

##### **5.2 Cycle Path through Mount Argus (over Stoneboat)**

In the previous version of the Kimmage – City Centre bus connects the proposed quiet cycle route, which runs initially from Poddle Park, Bangor Road and Blarney Park to Sundrive Road then via a newly created opening between the car park on the East side of Sundrive Road into Mount Argus Square, along Mount Argus Way, and then continued through Mount Argus Park; across the Mount Argus Church car park; then along Mount Argus Road, reconnecting with the main spine corridor at Harold’s Cross Park. This had certain merits in creating a quiet cycle way of meaningful length, of approximately 950m.

In the current application, having been unable to maintain the route through the private grounds of Mount Argus Church, the scheme now proposes a truncated element of this Poddle cycleway, creating at best a minute-long, route through a newly created opening to Mount Argus Square and Mount Argus Way, but which reconnects with Lower Kimmage Road at the entrance to Mount Argus Park. The length of this route is 344m, which is a longer route than if a cyclist remained on the cycle track at Sundrive Road and turned left into Lower Kimmage Road using the current advisory cycle route. This route is 266m and will be safer than heretofore, as the road conditions would be much enhanced due to the creation of the bus gates (particularly if the no left turn is reinstated as requested above). The benefits to cyclists of this element of the route are thus negligible.

The creation of the stretch of cycleway along the Poddle at this point has 3 further disadvantages:

- (i) It creates an engineered piece of infrastructure, as described in the EIAR Vol 4 Appendices (Page 17), the proposed scheme will direct cyclists from Sundrive Road via a new connection to Mount Argus Square, Mount Argus Way and Mount Argus View via a **proposed steel boardwalk structure over the River Poddle** (and the Stone Boat feature)’. Such a structure would be costly in monetary terms.
- (ii) It would potentially damage the setting of the Stone Boat weir which is registered as a recorded monument under RMP/SMR No. DU018-043003, The Stone Boat is a significant cultural heritage asset. It was built during the medieval times in 1245 to split the River Poddle, with one branch supplying Dublin city and the other branch supplying the local mills. While the current stone boat is a modern replacement it is a marker of a significant heritage asset as warranted by the Regional Rating (Appendix A. 16.2 Inventory of Architectural Sites, , p 1, EIAR Vol 4 Appendices).
- (iii) There would be potential ecological damage to the riparian habitat of the Poddle River.

The proposed infrastructural cost, together with some potential ecological damage vis a vis the value achieved for cyclists seems low, and we would ask An Bord Pleanála to carefully assess this element of the proposal.

## (6) Public Realm

The HCVCC believes that there is a lost opportunity in the proposals to improve the public realm to a much greater extent throughout the Harold's Cross area both on the Kimmage to City Centre Corridor and the Templeogue/Rathfarnham Corridor.

There are a number of key areas where public realm improvements could significantly enhance the pedestrian environment and this is a missed opportunity for a major infrastructural project to deliver real improvements to the pedestrian environment. The public realm improvement works along Harold's Cross are limited and are confined to the widening of footpaths at a number of points, paving of parking bays and the planting of a limited number of trees. There is little by way of additions to the public realm on much of Kimmage Road Lower, particularly beyond Mt Argus Church.

### **6.1 Sundrive Lower Kimmage Road Public Realm Improvement**

A previous public realm improvement scheme designed for the Sundrive/Lower Kimmage Road junction has been severely curtailed. The public realm enhancements at this point now 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.

### **6.2 Harold's Cross Village Centre Public Realm Improvement**

In the village centre of Harold's Cross along Harold's Cross Road, in the commercial areas both before and after the park we believe that consideration should be given to elements of traffic calming that would further prioritise the pedestrian and cyclist.

Changing the road surface for example, to a paved surface would indicate to drivers that this is an urban village centre, where the pedestrian is being prioritised. It would signify that there is increased pedestrian activity between the East and West sides of Harold's Cross Road in particular around the Harold's Cross Educate Together National and Secondary Schools at St Clares National School and the commercial area beyond the hospice (See above). The School Zone will already identify the need for caution and increased vigilance, but an element of surface change on the roadway at the village centre would indicate that this was a commercial area where traffic should slow and that pedestrians are being prioritised.

The provision of much greater tree planting should be considered, for example on Harold's Cross Road from the top of the park(south) to Emmet Bridge there is only evidence of 25 new trees being planted. Historically Harold's Cross was an area of orchards and our local, active prize winning Community Garden the Kingfisher project and the Harold's Cross Grow Group, have planted apple trees at a number of sites throughout the area. We would like to see this heritage reflected in an improved public realm. The Design Manual for Urban Roads and Streets (DMURS) notes that trees are an integral part of street design and we would ask An Bord Pleanála to include greater provision for the inclusion of greater tree planting in the upgrade of the public realm.

Throughout the areas affected by the corridor there is little or no mention of the provision of street furniture. The DMURS also notes that 'In general the provision of street furniture must be considered as part of the overall design of the street'. Given the level of street re-design in this proposal we would stress that the consideration and provision of street furniture should be considered and included.

## 7. CPO of Private Open Space

HCVCC are not supportive of the CPO of front gardens take from homes, in particular the CPO of part of the Gardens of 15 houses from No. 33 to 61 Harold's Cross Road, and from the hard landscaped area in front of Sheltered housing operated on Harold's Cross Road. The institutional uses of St. Clare's School and the Harold's Cross Hospice may be in a better position to bear such CPO of open space.

## 8. Heritage Impacts

HCVCC 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, we would encourage a less invasive proposal

As outlined above (section 3.3) we have serious concerns for the protection of the setting of Harold's Cross Park which the heart of our community, a key historical green developed as a Victorian Park and symbol of the neighbourhood. The removal of the pavement to facilitate greater vehicular traffic as proposed is invasive and damaging both to the visual amenity of the park on the trees therein. The removal of the pavement will also include the removal of the granite kerbstones which are included in the list of paving and surface treatments of architectural heritage value which were identified and included in Table 16.16 of the EIAR Vol 2. Chp. 16:

Section	ID	Location	Description	Significance and Sensitivity
Harold's Cross Road from Harold's Cross Park to the Grand Canal	C0011BTH119	Harold's Cross Green, Harold's Cross Road	Granite Kerbs	Regional Importance, Medium Sensitivity

Source: p 16 EIAR Vol 2. Chp. 16

The removal of the footpath would entail the removal of the granite Kerbs which are of Regional Significance. We would ask An Bord Pleanála to ensure that this footpath is not removed as part of the changes introduced in this corridor.

## **9. Ongoing Monitoring and Engagement**

Given the complexity and scale of this project we would stress the importance of on-going monitoring of the scheme once implemented and further engagement with communities. We would request that An Bord Pleanála would ensure that there is a commitment to such ongoing monitoring and community engagement as the infrastructure is implemented and operationalised. We believe that this would be particularly important given the need to ensure that the system operates as planned, that bus gates and priority corridors are enforced. There is a need for agility in responding to challenges and to changing the systems to work to the benefit of all. We would stress that any amendments need to be consulted on in the communities affected by them.

## **10. Conclusion**

HCVCC recognise that the Bus Connects scheme and the Kimmage to City Centre Core Bus Corridor scheme are important projects for the future of Dublin City. The HCVCC is supportive of increasing bus infrastructure, and of improving cycling and pedestrian infrastructure in order to address the transport impacts on carbon emissions and its contribution to climate change. We are aware that everyone in society must bear some of the costs in relation to addressing climate change and recognise that there will inevitably be an impact on our community from major infrastructural changes to encourage modal shift. While we recognise the value of the current Bus Connects scheme, we also believe that, longer term solutions must be considered for our capital city and include environmentally friendly Light Rail and/or Metro for a growing part of the south west of the city to properly meet the needs of future generations of commuters.

HCVCC are committed to working within our community to deliver change and are active in planning for the sustainable future of Harold's Cross. As outlined in our submission we have concerns regarding some elements of the Bus Connects Kimmage to City Centre proposal and believe that there opportunities to improve the project. In particular we believe that some of the impacts of redistributed traffic which will impact on our neighbourhood in Harold's Cross can be alleviated.

We appreciate you considering these impacts and trust that An Bord Pleanála will take on board the points that are raised in this submission, in the decision on this proposal.