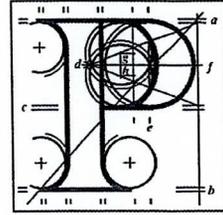


Our Case Number: ABP-317660-23



An  
Bord  
Pleanála

Eóin Duggan  
7 Mount Argus View  
Harold's Cross  
Dublin 6W  
D6W Y593

**Date:** 13 September 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

Teil	Tel	(01) 858 8100
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

To: An Bord Pleanála  
Strategic Infrastructure Division  
64 Marlborough Street  
Dublin 1 D01V902

**Observation submitted online to the Strategic Infrastructure Division**

11<sup>th</sup> September 2023

Re. Kimmage to City Centre Core Bus Corridor Scheme Observation & Objection

Dear An Board Pleanála Members,

I would like to submit an observation outlining my strong objection to the proposed cycle lane as part of the Kimmage to City Centre Bus Corridor Scheme which will have, in my view, a disproportionate, adverse and potentially detrimental impact on my community in Mount Argus and Church Park.

The community is made up of families with children, pensioners, professionals, students, and more. We are a mix of home owners, renters and people in temporary accommodation. There are over 400 people here who use a variety of means of transport for work and pleasure ranging from cycling, driving, and public transport to walking and even scooting. We are all interested in having positive improvements to our transport structures here in our community.

As you are no doubt aware, the Residents Association of Mount Argus & Church Park has engaged with everyone in our estate as well as with the wider Kimmage Business Community and there is a widely shared view that the proposed scheme would have detrimental effects on our community and that alternative plans should be considered.

The proposed creation of a surprisingly short cycle path from Sundrive Road through our young, vibrant and busy estate should not be supported by your Body.

The previous version of the Kimmage – City Centre bus connects, proposed a cycle route, through an opening between Sundrive Road and Mount Argus Way, which would then have run 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. Although this was not something that I supported, the proposal was at least aimed at creating a quiet cycle way of meaningful length of approximately 950m.

**The current, revised option, having been unable to traverse Mount Argus Church, now proposes a pointless, at best minute-long, route through Mount Argus only, reconnecting with Lower Kimmage Road at the entrance to Mount Argus Park. The length of this route is 344m, which is longer than if a cyclist remained on the cycle track at Sundrive Drive road and turned left into Lower Kimmage Road using the current advisory cycle route (this route is 266m).**

Clearly, the benefits to cyclists will be negligible. As stated in the Environment Impact Assessment Screen Report, the existing advisory cycle lanes on Lower Kimmage Road will be retained and not altered, as the road conditions would be much enhanced as a result of

the reduced general traffic for which the Bus Gate will facilitate. Therefore, any potential claims for increased safety are groundless.

In addition, I would note a number of more detailed concerns below.

### **1 - Questionable Necessity of the Cycle Path as Currently Proposed and potential alternative**

Lower Kimmage Road already has a decent, frequently used cycle lane which is well kept. Minor improvements to the current cycle lane to increase its safe usage for all road users would have a significant impact. I would further suggest that most cyclists based on Lower Kimmage Road would never use the proposed route Mount Argus Estate and would prefer to use the current cycle lane already available to them.

Bus Connects High-Speed Bus corridor already includes street markings for a cycle lane on each side of the corridor, evident on the plans, Map 5 Preferred Route, page 29 specifically refers to the carriage area being for 'no through traffic except buses, taxis and cyclists. Why, therefore, on a road with city-bound traffic being removed due to the presence of a bus gate in addition to fines for those using the bus corridor, would the separate cycleway be required adjacent to the corridor? I would argue that some very serious reconsideration of the current proposal is required in order to ensure the best result for the community in the estate and the wider Kimmage community.

It is my opinion that this entire new proposed cycle path route makes no sense and is not an improvement to the efficient and effective cycle lane already in place, even disregarding the negative impact the proposal would have on the estate and community. The current cycle lane could be improved from a safety perspective with the addition of plastic, rubber, poles between the cycle lane and main road, such as those recently installed on Clanbrassil Street Upper, Dublin 8.

In addition, an alternative route was drawn up by the Mount Argus and Church Park Residents Committee which would provide for a much longer and more meaningful cycle route through Eamonn Ceannt park (see Appendix 1). That park is much bigger and already contains a path nearly wide enough to accommodate cyclists, so there are options, and I would suggest better options, for having more cycle lanes in the area.

### **2 - Lack of Consideration of past experience and Community Spirit & Safety**

The builders of the Mount Argus Estate, Tiernan Development, had to increase the height of the wall separating the estate from Sundrive road in the '90s due to the high levels of criminal activity and burglaries (escaping through Dublin 12). The Gardaí supported the residents' requests for these works to be carried out by Tiernan Development.

Only after increasing these wall heights and the subsequent completion of the Mount Argus Square Apartments including its boundary wall, did the levels of criminal activity begin to decrease, when those responsible no longer had a means of escape without pursuit by the Gardaí. It is this same wall by the Mount Argus Square Apartments that is being proposed to be removed once again. I ask An Bord Pleanála to reflect on this utter lack of understanding of our Community's history in this current proposal of a Cycle Path.

Furthermore, having this proposed dedicated Cycle Path will:

- Increase speed for those seeking to escape (which also carries Health & Safety concerns for anyone else on the path)
- Impose an entrance not wide enough for Garda pursuit – same issue as above.
- Duplicate the Bus Connects high-speed corridor which contains specifically marked cycle lane designated space on each side, also referred to on page 29 of their proposal.
- Impact access and egress from the varied areas both within the Estates and also down along Mount Argus Road, with added Health & Safety concerns.

### **3 - Increase in anti-social behaviour**

The proposal is to eliminate the wall that currently exists at the end of Mount Argus Square to create a new entrance from Sundrive road. I am strongly of the view that, a result of this, there is likely to be an increase in anti-social behaviour from individuals circulating through that passage. I have discussed this with Gardaí, including our community Garda Tony Byrne (in Crumlin Garda station) and they share my concerns.

You may be aware that there has already been anti-social behaviour from individuals jumping the wall and a fencing was erected as a result on top of the wall (where the ivy now grows) to deter this. I urge An Bord Pleanála to heed the advice of An Garda Síochána who could provide details of such incidents of anti-social behaviour. Long-term Residents have recalled that anti-social behaviour was widespread and particularly unpleasant and intimidating, and the fencing made a significant improvement. Eliminating the wall would undermine all the significant efforts that have been made in the last few years by Dublin City Council and the Mount Argus and Church Park Residents Association together to eradicate anti-social behaviour in the estate. Please note that Mount Argus Park is not a gated park and it is accessible 24h. Facilitating the access to the park through the proposed cycle path would only increase anti-social behaviour at night time, an issue that residents have still to report regularly to the Gardaí, in addition to the littering which is also a problem the residents are facing every time a volunteer park clean-up is organised.

### **4 - Increased Danger to Cyclists and other road users, including Mount Argus and church park Residents**

The scheme proposes that cyclists share the road on Mount Argus Way and Mount Argus View. There are two severe bends at Mount Argus View, both of which, in the context of also introducing the cycle path proposed, are extremely dangerous. The visibility on both sides is very poor, the road is very narrow and cars are very often parked there. It is impossible for two cars to meet at the same time and it is up to one driver to stop to let the other vehicle go through first. There are many near misses involving vehicles on both bends – one of which is outside my front door on Mount Argus View and I witness them on a daily basis.

Cyclists are vulnerable road users. I cycle to and from work myself and know this from personal experience. To encourage and facilitate cyclists to share this particular road with vehicles is a reckless idea and is likely to lead to accidents involving them and the community within the estate. Bear in mind that there are pensioners with reduced mobility and many families with small children, who would be at risk in their home estate whilst facing a potentially long queue of cyclists rushing at high speeds to get in and out of Dublin City Centre

I would ask that An Bord Pleanála consider this scenario in their review as it would become a regular occurrence for all cycle path users and people in the estate. I would argue that the above is a scenario that neither the cyclists nor any member of the community would want to encounter.

I would also like to highlight that the proposed cycle path would not help to ease any of the main road traffic problems in the area. As a resident, I would like to point out to An Bord Pleanála that the main source of traffic problems, delays and bottlenecks occurs further along the Lower Kimmage Road at the Harold's Cross Bridge. The proposed cycle path will simply cut a line through Mount Argus Estate and will not ease the main source of the problem.

#### **4 - Lack of consultation & evidence showing where cycle paths in enclosed estates work for the communities**

The NTA propose that a recently built wall in the 90's immediately adjacent to a large Apartment Complex be taken down, and that terraced housing cul-de-sacs be turned into thruway traffic flows and where a cyclist enters the estate via a previously non-existent access point.

The NTA never engaged with the residents' association or any member of the community in the estate to discuss this proposal despite the community being a significant stakeholder

Furthermore, there is no evidence presented as to whether in the past a short cycle path through an enclosed, populous, busy residential estate (including a road crossing) actually has a positive impact on those living there.

#### **5 - Loss of biodiversity**

To build the new connection for the cyclists, the document notes that (quote) 'there will be works on the adjacent riverbank, which has the potential to result in significant permanent negative effects' (page 29).

The Mount Argus Estate, due partly to its proximity to the River Poddle and Mount Argus Park is extremely rich in biodiversity. This is something cherished by residents who feel particularly grateful to live in an area within Dublin City where wildlife has been preserved and encouraged. Residents are also delighted to share these moments regularly with other members of the community who visit Mount Argus Park for recreational purposes with families, friends or pets. The Park serves a great purpose to the people of Harold's Cross in its current state and changing it to include a cycle path for the use of hustle and bustle City Centre commutes would most certainly negatively impact upon Mount Argus Park as we know it.

With any building or development project, there is increased pollution as a direct result of work carried out and the current proposal would certainly lead to small losses in biodiversity in the affected areas in the estate. The loss of trees, shrubbery and greenery in this small estate as a result of this cycle path (and other associated works) would also impact wildlife.

Recent scientific reports have highlighted the further decline of biodiversity in Ireland. On 9 May 2019 Dáil Éireann declared a 'biodiversity crisis', making Ireland the second country to do so. Dublin City Council declared a biodiversity crisis for Dublin City on 14 October 2019<sup>1</sup>.

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<sup>1</sup> <https://www.dublincity.ie/news/dublin-city-council-launches-consultation-100-point-action-plan-biodiversity-conservation>

The proposal to build a boardwalk around the riverbank and encourage additional heavy bicycle (and inevitably footfall) traffic there is contrary to Dublin City's desire to protect biodiversity. If the cycleway is approved to go through Mount Argus Park, the planting and re-wilding works carried out by the council will be removed to make way for the cycleway.

## **6 - Loss of cultural heritage asset**

According to the EIA Screening Report for the Kimmage to City Centre Core Bus Corridor Scheme (Page 17), the proposed scheme will direct cyclists from Sundrive Road via a new connection to Mount Argus Way and Mount Argus View via (quote) 'a proposed steel boardwalk structure over the River Poddle (and the Stone Boat feature).'

The Stone Boat weir is actually registered as a monument under RMP/SMR No. DU018-043003, ITM 713915, 731387. 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. Dublin City Council has considered it as one of the highlights of a walking trail in Harold's Cross.

It would seem preferable to celebrate our cultural heritage asset, rather than to undermine it and potentially damage it under a new boardwalk structure.

In conclusion:

To remove the wall entirely now would be a negative step and I ask An Bord Pleanála to consider this objection in its review. There is a credible fear of increased antisocial behaviour, risks to health and safety, damage to Community spirit and more pollution arising from rubbish ending up in the Park, in the River and in the shrubbery that currently thrives in its current environment. For all the above-mentioned reasons I am strongly opposed to the proposed Cycleway going through Mount Argus Estate. I would be grateful if you could consider the points made above when reviewing the Kimmage to City Centre Core Bus Corridor Scheme Observation & Objection and urge the NTA to reconsider re-pointing the route of the Cycle Path to and through Eamonn Ceannt Park (as illustrated in Appendix 1).

In addition, the proposed cycle path does not consider the Health and safety issues associated with it. The increasing numbers of children who are using the park will face a speed throughway for cyclists, and many going to church will meet a section bisecting the path where no controls such as lights etc. are in place like those which already exist out on the main Kimmage Road. Additionally, the increased human traffic volumes with the new residents from both the Mount Argus Mill development and the Transitional Accommodation Hub with 77 units and a considerable volume of children must all converge together on a blind corner with the cyclists on the point of entry/egress to and from the park.

I thank you for taking the time to look over this submission and I hope that the observations contained herein are considered a valuable contribution, from a developmental, health and safety, environmental and strategic aspect. There are a number of areas of concern, not just for the residents of the estate but also for the significant community accessing Mount Argus Park, Mount Argus Church and Sundrive Road.

I am very concerned by this proposal. Our area has seen a significant reduction in crime and antisocial behaviour in recent years due to community cooperation, awareness, Garda assistance and subsequent intervention. This included the increasing of wall heights in certain

areas of the estate. The plan to remove these walls and undo the good work that has been completed in recent years seems to lack any critical, rational analysis and I want to record my opposition to it on that basis.

As presented, the proposals appear to lack understanding and empathy for residential community life.

Yours Sincerely,

Eóin Duggan

7 Mount Argus View,

Harold's Cross,

D6WY593



## Appendix 1

Alternative cycle way through park, greenway cycle

Clogher road has sufficient width to allow for segregated cycleway to meet up with the Canal

Slightly longer and the additional safety should encourage usage

Potential direct access could be established through the Council depot opposite Blarney Park, further reducing mixing with traffic.



Distance ?  
1,993.48 m ▾

Existing proposal

Mostly along narrow road with designated but not protected cycleway.

Mostly urban

Not enough width for designated protected cycleway



Distance ?  
1,860.81 m ▾