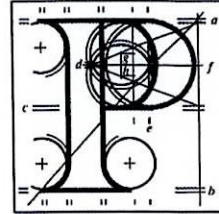


Our Case Number: ABP-314942-22



**An
Bord
Pleanála**

Alan McQuaid
C/O Residents Association PPN:0158
4 Red Cow Cottages
Palmerstown Village
Palmerstown
Dublin 20

Date: 12th July 2023

Re: BusConnects Lucan to City Centre Core Bus Corridor Scheme
Lucan to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter, please contact the undersigned officer of the Board.

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

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

AA02

Tell	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Residents Association PPN :0158

Woodfarm Cottages / Red Cow Cottages / St. Fintan's Terrace / Glenside Side Terrace
c/o 4 Red Cow Cottages, Palmerstown Village, Palmerstown, Dublin 20.

Ref: AMcQ/aoc
6th July 2023

An Board Pleanála
64 Marlborough Street
Dublin 1
D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
10 JUL 2023	
Fee: €	Type: _____
Time: _____	By: <i>Post</i>



Dear Sir / Madam,

Ref : ABP 314942-22
Lucan to City Centre Core Bus Corridor Scheme (64)

Dear Sir / Madam,

We would like to respond to the NTA Responses to the observations made on the above scheme, focusing on Palmerstown Village / Old Lucan Road.

Given the timeframe in which these proposals had been presented, including during the pandemic when people could not gather, it was encouraging to see the level of the correspondence from residents of Palmerstown, many of these represented multiple residents. 81 submissions submitted by Residents, Businesses and Residents Associations, with 66 in relation to Palmerstown. It should be noted that the two Residents Associations, based in the Village/Old Lucan Road, covers over 320 homes in the area. These are the very people who will have to live 24/7 with the consequences should this proposal be granted in full. No desktop analysis or animated traffic models can ever truly reflect the day-to-day circumstances which Residents experience.

While the responses issued by NTA read smooth and organised, the impact on the households and traffic movements within Palmerston Village will be neither smooth nor organised. We stand by the comments made in all our other observations submitted to date.

We would like to make the following comments on the NTA responses: -

2.1.3.1 Routing of bus services through the Village Response by NTA

The NTA published the final version of the Dublin Area bus network in 2019, resulting from previous redesign proposals and with the consideration given to issue raised by over 72,000 submissions. Figure 2.1.3.1. presents Figure 4.4 of the Preferer Route Option Report showing the routing of bus services along Old Lucan Road Between Kennelsfort Road and The Oval.

Our Response

In 2019, the bus route was on the R148, not the Old Lucan Road. The 72,000-submission noted by the NTA related to the **entire Bus Connect Plan**, not just Palmerstown. Under the Freedom of Information, we had asked to see the submissions relating to Palmerstown Village **only**, which was refused. We asked for this information as it was

claimed a large volume of Residents supported same! This was not the feedback we got from the survey conducted in the Village area, or, indeed from the last public meetings.

The proposed Number 80, should be kept on the R148 as at peak times passengers travelling inbound / outbound to Dublin will be caught in the peak traffic flow in the Village, lengthening their bus journey, especially given that the vast majority of the bus users will be disembarking on Kennelsfort Road Upper and beyond.

2.1.3.2 Bus Stop Locations

a. Old Lucan Road (new bus stops)

The proposed location of the new bus stops on Old Lucan Road to serve the number 80 service was the subject of a number of submissions concerned about the impact on the architectural heritage designation of Woodfarm Cottages and Red Cow Cottages, expressing the view that the bus stop would be the centre of antisocial behaviour where there had previously been none, and it would devalue property.

Response by NTA

The existing bus stops in Palmerstown Village are located on Kennelsfort Road Lower. The Bus Stop Review Analysis in Palmerstown Village determined that the optimum location within the village centre was on Old Lucan Road between the junctions with Kennelsfort Road Lower and Mill Lane, which is a more suitable location to accommodate waiting facilities and provide a greater catchment area, while also facilitating the rationalisation of stops to improve bus journey times. Therefore, the Proposed Scheme provides paired inbound and outbound stops close to the recently installed signalised pedestrian crossing just west of Mill Lane on Old Lucan Road, as shown in Figure 2.1.3.2.1.

Overview of Bus Stop Assessment

Section 4.6.4.5 of Chapter 4 Proposal....

“To improve the efficiency of the bus service along the Proposed Scheme the positions and number of bus stops have been reviewed as part of a bus stop assessment”

The criteria for consideration when locating a bus stop are as follows:-

(Extract only)

- Location to key facilities
- Location to minimise walking distance between interchange stops
- Where there is space for a bus shelter
- Close to (and on exit side of) pedestrian crossings

Our Response

Location to key facilities

NTA claim that the locations will be more suitable location to accommodate waiting facilities and provide a greater catchment area! No one from the main estate over the R148 will cross over the R148 to access these two stops, just because they have shelter. The residential area around these stops will never increase twofold, as there is no development land left. The Ulster Bank is closed. Stewarts Care is not a facility accessed by the general public, requiring public transport. Clients living in house on the Stewarts grounds, do not travel alone, they are accompanied by a Caregiver at all times. They would very seldom use public transport and in fact there is a fleet of private minibuses and taxis available to them.

Waiting Distance Between Interchange Stops

People using the proposed Number 80, will be from the greater area of Palmerstown, who would have disembarked a bus at The Drive (2201) which is being removed. Having to disembark at the proposed bus stop on the Old Lucan Road, will add to their journey and additional time on foot crossing roads. Keeping the Number 80 on the C Corridor would give bus users a quicker travel time and immediate access to the C Spine routes.

Where there is space for a bus shelter

Removing parking for the placement of platforms to house bus shelters, which will seldom be used and will be destroying the street scape of the Village in the process, is not progress.

Close to (and on exit side of) pedestrian crossings

It should be noted that this newly installed pedestrian crossing was requested by Stewarts Care well before the Bus Connect Plans were presented back in 2019, when **no bus route was running through this section of the Old Lucan Road**. It should be noted that people still go to the desired crossing point at Lower Kennelsfort Road/Old Lucan Road, with only a handful of Careers using the crossing with their Service Users.

Architectural Heritage Impact

NTA response only mentions Red Cow Cottages in the 4 paragraphs.

Our Response

The ACA area covers both homes at Woodfarm Cottages 1-8 and Red Cow Cottages 1-8. We would like to point out that the NTA have stated that the proposed bus shelters are proposed in front of number 1 Red Cow Cottages, which should read 1-3 Wood Farm Cottages. They also have the proposed bus shelter at Millbrook Apartments, which should read Clarkeville Tce.

We do not agree with the statement that the magnitude of impact on the cottages is categorised as low, or that the predicted Operational Phase impact is an indirect, negative, slight, long-term visual impact on the setting of the Red Cow Cottages and the streetscape.

As we have said before while we all appreciate that change happens, too much of our build heritage combined with streetscapes have been ruined. Palmerstown Village / street scape needs to be protected at all costs for future generations. As was noted by Bus Connect in the second proposal – **do nothing scenario is best practice in this instance.**

Antisocial Behaviour

NTA quotes a study from Los Angeles, whereby bus stops can have an impact on crime. Palmerstown Village would not be a like with like comparison. It is every evening after 6pm a quite and relaxing place. However, it can, as a lack of Garda presence at times be a place when youths gather during good weather/holidays etc.

With the recent closure of the Ulster Bank, there are nightly calls to Ballyfermot Garda, due to gangs hanging around, drinking etc.

2.1.3.3. Traffic Impact

Response by NTA

- a) ii. Banning of left turn from Kennelsfort Road Lower

As set out in Section 4.5.21 of EIAR Chapter 4 Proposed Scheme Description: “the left turn movement from Kennelsfort Road Lower to the R148 Palmerstown bypass eastbound is to be prohibited to facilitate new signalised crossing on the east side of the Kennelsfort Road junction to serve the enhanced bus stops, the pedestrian demand and to cater for the proposed two way cycle track that crossed the R148 Palmerstown bypass at this location. Traffic in Palmerstown Village wishing to travel east on the R148 towards the city centre will be able to do by travelling east along the Old Lucan Road to the junction with the Oval.

Our Response

The removal of the left turn eastbound, will just add to the traffic congestion on the Old Lucan Road / the Oval junction.

The construction of a new set of traffic lights to facilitate a Tucson crossing, on a national road which services over 85k vehicles on a daily basis, for cyclists, is a desk top exercise too far. The few cyclists who use the area currently, have said themselves they will just stay on Lower Kennelsfort with the car and travel over to Upper Kennelsfort road.

Our citizen survey which we supplied with our last observation show the very low level of cyclist who use the Village area.

b) iii Impact of right turn bus lane into Old Lucan Road

Response by NTA

As set out in Section 2.1 of EIAR Chapter 2 Need for the Scheme. "The Proposed Scheme is needed in order to enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor through the provision of enhanced, walking cycling and bus infrastructure on this key access corridor in the Dublin region."

Our Response

Taken this bus route (nbr 80) off the main corridor (R148) will not enhance the experience for either the bus user or the local residents. Buses will be held up at peak time in the Village, which is already congested at peak time. Even with only half of the SHD development open as of this date, the increase in traffic movements is noticeable already. This bus route was not sought by the majority of locals, which was very apparent at the two public meetings held in 2022 and the level of submissions made.

The area is already safe for cyclists, there have never been an accident or fatality with a cyclist on the Old Lucan Road through the Village. SDCC themselves class the road as ""quiet"".

We note the comments under NTA response under ii Removal of left turn slip entering the Oval from the R148 i.e.

"Furthermore, the safety implications of the Proposed Scheme have been considered by the Designer and by an Independent Auditor as part of the Road Safety Carried out" This sentence appears on a number of occasions throughout the responses.

c) i. HGV Movements and Kerb Radii

ii. 90degree bend on the Old Lucan Road and Access to Shaw Tree Services

Response by NTA

As set out in Section 2.1. of EIAR Chapter 2 Need for the Scheme.....

Point of correction, none of Shaw Tree Services exist the yard out onto the Old Lucan Road, they exist immediately to the right out onto the R148. This business has a traffic management plan for all vehicle users, which is quite strict on this point. Inbound vehicles enter via the Old Lucan Road.

d) Traffic Volumes

Response by NTA

The proposed Scheme aims to provide an alternative to the private car and promote a modal shift to public transport walking and cycling on this key access corridor in the Dublin region. Section 6.4.6.2.8.3 of Chapter 6 Traffic and Transport of Volume 2 of the EIAR states that:

"Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Slight and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negligible.

In meeting its objectives, the Proposed Scheme will delivery strong positive impacts in terms of promoting active travel and sustainable transport. It is noted that the modelled forecasts for the 2028 opening year indicate that one of the impacts of the proposed Lucan to City Centre Core Bus Corridor Scheme is that there is a reduction of 4% in the number of people travelling via car along the R148 Palmerstown bypass/Chapelizod bypass corridor towards the city centre at AM peak hour.

Our Response

Charts, figures and estimates are all very fine, but they are just estimates. Since the pandemic, with people still to this day working some days from home and deciding to use their private vehicle for one or two a week to travel to work, as per a recent survey, the working from home era is still around.

2.1.3.4 Loss of Parking / Parking Provisions

Response by NTA

a. Old Lucan Road between M50 and Kennelsfort

Section 6.406.1.34 of EIAR Chapter 6 Traffic and Transport reports on the assessment of the impact that the Proposed Scheme will have on parking and loading at this location and states: "There is currently space for approximately 194 vehicles to park informally on Old Lucan Road between the M50 interchange and Palmerstown Village (Kennelsfort Road Lower). All of the 108 spaces on the north side of the road will be removed to accommodate a proposed 3M-wide, 2-way, cycle track to the north of the road. Double yellow lines will be introduced to prevent any vehicles parking on the kerb and partially blocking the cycle track. All the existing informal and paid parking spaces on the south of the road will be retained. The residential properties in this area all have private driveways, and these spaces that will be lost are not associated with any specific residential or commercial properties. The overall impact at this location is considered to be Slight.

Our Response

The loss of 108 car spaces is **NOT SLIGHT**. The space lost **WILL** have a dramatic and detrimental affect not just on visitors or Residents but will also have a huge effect on the employees of the 30 plus businesses in the Village area, who travel by car. We have surveyed a number of the businesses to gauge where their staff travel from and why public transport is not used. People travel from Dundalk, Trim, Gorey, Mullingar and Edenderry. Young parents who have to drop off children to child minders or school. They can't use public transport. Those living in Lucan, Clondalkin, Celbridge and Maynooth, again don't use public transport due to time constraints, and don't envisage swapping to either public transport or cycling in the foreseeable future.

There are just five pay and display car spaces on the southside of the road in the above-mentioned area. Does the NTA really believe that employees will be able to run out every 2 hours to move their vehicle and buy tickets for up to 8 hours each day!

The road width at Waterstown Avenue on the Old Lucan Road, if reduced by 3m to facilitate a cycle track, it will result in a very narrow carriageway. We have as lay people marked out the roadway and two vehicles cannot safely pass one another. Vehicles travelling eastward would have to encroach onto the cycle track. **Accurate engineering measurements are required before any decision is made on this proposal.**

b. Old Lucan Road between Kennelsfort Road and The Oval

In respect of this section of Old Lucan Road, Section 6.4.6.1.3.4. states: "There are currently 18 permit / pay & display spaces and one disabled space on....."

"Between Palmerstown Village and R148 Palmerstown Bypass, there are currently 62 permit / pay & display spaces on Old Lucan Road, which are located in parallel bays to both the north and south of the road. There are also two disabled spaces on the north kerb in this section. These spaces are likely to be used by local residents and those accessing local businesses. Under the proposals, all of the 29 spaces on the north side of Old Lucan Road would be removed to allow provision of a 3.0m wide, two-way, cycle track alongside the northern footpath. Private properties and business on the north side of the road, between Kennelsfort Road Lower and Mill Lane, have off street parking available, comprising approximately seven parking spaces. All but one of these residential properties has a private driveway and the two businesses (Ulster Bank and the Coach House) have private car parks. 14 additional spaces, including one disabled space, are proposed to be created on the south side of the road by converting some of the existing parallel parking to perpendicular spaces, and narrowing the footway. In total this would allow for the provision of 47 spaces, plus two accessible spaces. The

overall loss of parking in this location would be 15 permit / pay and display spaces. The overall impact at this location is considered to be slight.

Our Response

The Ulster Bank never provided off street car parking for customers. Customers parked on the roadside. It should be noted also that The Ulster Bank ceased trading in the Village in March 2023 and the site is currently up for sale. The old Coach House Café (currently closed for renovations) has its own private car park to the rear, which has a disabled car park space.

We have grave concerns about the proposed perpendicular parking spaces. Putting the DMURS Design Manual aside, which is just a key design guidance. It states "perpendicular or angled spaces may be provided in lower speed environments such as local streets. Desktop publications versus reality and the effect on residents cannot be emphasised enough. We supplied photos in our last submission showing that 40ft trucks currently existing Mill Lane barely miss parked cars, there is not sufficient road space to put in place perpendicular parking at Red Cow Cottages. **Again, until such time as a complete survey of the actual road space is done, these proposals should not be passed.**

Accessible Parking (under C point)

NTA Response

The proposed accessible parking space outside no. 8 Red Cow Cottage is proposed to replace the accessible parking space outside no 2 Clarkeville Terrace which needs to be removed to provide the two-way cycle track, see Figure 2.1.3.2.17. The proximity of the relocated accessible parking space to the proposed pedestrian crossing will ensure customers of the Coach House Café requiring accessible parking will not be disadvantaged.

Our Response

The Coach House Café, is a commercial business which has its own car park to the rear which features a disabled car space, just inside the gateway. There is no necessity to provide a further accessible parking space on the street. It should be noted that within the last 3 months a large extended (covers 3 car spaces) accessible parking was installed at The Jazz Hub, some 50 yards away.

2.1.3.5. Proposed Cycle Track

NTA Response

As stated in Section 1.2 of EIAR Chapter 1 Introduction, one of the objectives of the Proposed Scheme is to enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable.

Our Response

There are less than 20 cyclists a day currently travelling through the Village. There is no need to segregate them from general traffic. After 6pm every evening, there are little or no cars present on the road. At weekend when businesses are closed the road structure is quiet, cyclists themselves freely admit they have no issue with safety on this road. We have never, never had an accident on this road involving a cyclist.

Again, we have stopped and spoken to the regular cyclists who use the road early morning / late evening, Monday to Friday. Not one had issue with safety on the road. Most said that they did not like using a contra flow and would stay on the roadway heading westward towards Lucan.

If there are concerns about safety of cyclist currently using the road, perhaps the introduction of speed ramps to reduce speed would be more appropriate!

We have no further comments to make on this part of the NTA response on the cycle track as they become repetitive.

2.1.3.6. Pedestrian Facilities

NTAs responses to issues

- a. Pedestrian crossing at Kennelsfort Road Junction/R148

We have nothing further to add to our original comments. The traffic chaos which will happen during peak travel, for any period of time, cannot be justified for any **“proposal”**.

Without accurate and details road measurements, desk top exerises working of OPW or Google Maps do not give accurate measurements. The road width at Waterstown Ave/The Horse Shoe/Annadale/Robin Villas is a prime example. 3m from the current road, adjusting the remaining width to accommodate two lanes of traffic is not viable. Inevitably traffic will have to travel onto the proposed contra flow cycle track.

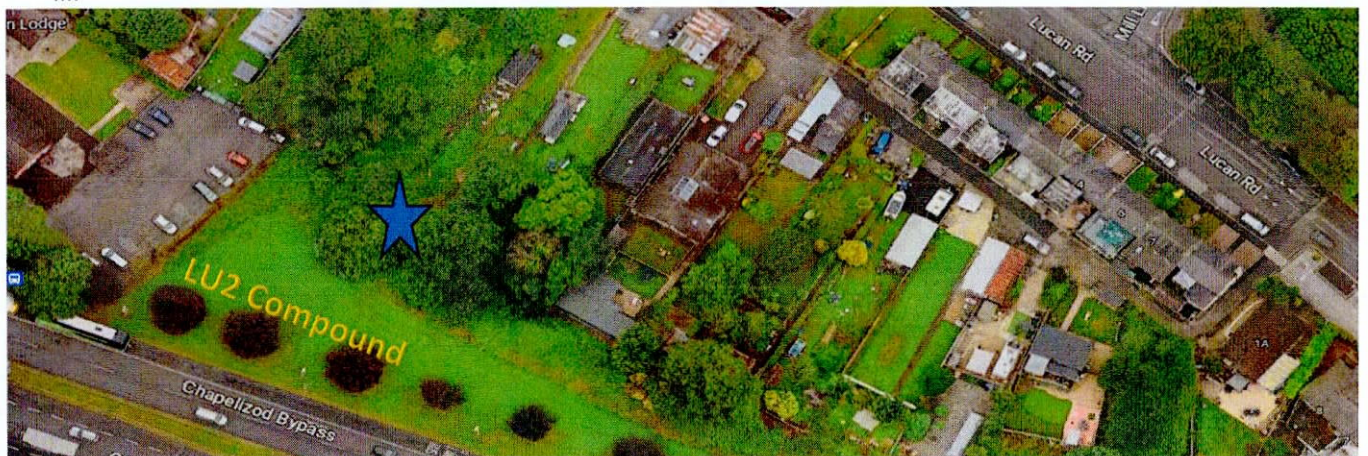
2.1.3.8 Construction LU2 Building Compound

NTAs responses to:-

- I. Trees Removal
- II. Biodiversity (bats and badgers)
- III. Drainage Infrastgtructure
- IV. Traffic and amenity impact of compound

Our Response

- i. Tree removal. Yes, we do realise that the red beech trees are not native to Ireland (having been introduced to Ireland in the 18th century) however, these broadleaf trees are very important for bees and other pollinators to a degree that many native Irish trees cannot match. We had to wait many, many years for these trees to mature and they do provide some protection from noise etc. We do appreciate that semi mature trees would be replanted, but these will take years to reach the same height.
- ii. Biodiversity. In our submission we focused on the badger set which is located behind Woodfarm Cottages. We strongly disagree with the statement made by NTA “Further to the issues raised in the submissions regarding the presence of bats, badgers, foxes at the location of the proposed Construction Compound LU2, a walk over survey was undertaken on 14th March 2023 in order to validate the results of the earlier surveys. This walkover survey confirmed the findings in the earlier surveys with no evidence noted of badgers at the proposed Construciton Compound LU2 Location. Not only are track marks obvious, but the smell also associated with the dean can be detected even from a short distance. During March, the female would still be in the den with the newborn cubs. Who conducted the survey? What were their credentials? The star indicates the approximate location. We would be happy to show a member of An Bord Pleanála the area in question. In the same area on July 4th, a deer was caught on the security camera of Number 4 Wood Farm Aces, as well as badgers and a vixen and her 4 cubs.
- iii.



- iv. Drainage. The pictures submitted in our original submission, are fact, not fiction. We were assured by ABP that the SHD at Palmers Gate would not affect the water level, and it ultimately did. We feel that while the NTA dismissed the SHD is outside the extents of this application, the affects of the SHD combined with the levelling of this grass embankment will lead to higher water table, causing more flooding in the rear gardens.
- v. Construction traffic noise. Residents of the Old Lucan Road will be submitted to a daytime noise level. Having experienced construction traffic for the past 3 years associated with the SHD of Palmers Gate, Resident's quality of life yet again will be affected, for up to two years. We note the noise mitigation measures, however, who would govern same and given the nonresponse from SDCC to breaches of planning conditions on the SHD site, we have no confidence in this aspect of the report.

There is a South Dublin County Council Depot located on the Old Lucan Road, on the other side of the M50, why can't this be used?

2.1.3.9. Other Common Issue

NTA Response

b) Impact on Woodfarm Cottages and Red Cow Cottages

Our Response

We stand by our initial submission whereby no routing of the nbr 80 is required through the Village. Also, in the paragraph 4 the wrong house name is used i.e. Under The Proposed Scheme, bus shelters in front of number 1 Red Cow Cottages and at the Millbrook apartments...this should read Woodfarm Cottages and Clarkeville Tce. The same error appears in Footway width paragraph.

During the time since this Proposal was introduced back in 2019, we have never, never seen an onsite engineer, or witnessed a traffic survey being done. We note in the NTAs response Section 6.3 "provides an overview of the existing traffic and transport conditions within the redline boundary of the Proposed Scheme. The baseline conditions have been informed by several site visits of the local environment, comprehensive traffic surveys, and a desktop review of the most recent aerial photography.

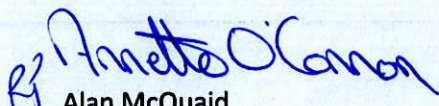
No amount of modelling or animated traffic models used in the preparation of this desktop proposal will acutely reflect the end results on the Residents and Wildlife in Palmerstown Village.

Palmerstown Village and the Residents of it have over the years put a huge amount of man hours and money into enhancing the area to create a more welcoming place to live in and visit. This will be forever eroded with the introduction of a bus service, placement of platforms/Bus Shelters and insertion of a totally unnecessary cycle track.

We also have to consider the various businesses within the Village area. Removal of vital informal car spaces along the Old Lucan Road will have a negative effect on the staff who travel here to work. It cannot be assumed that people will switch over to public transport, it is not viable for everyone.

We ask An Bord Pleanála to seriously consider the impact this proposal will have not only on this generation of Residents of the Village, but also future generations. Palmerstown Village is classed as a Heritage Village by South Dublin County Council, and we strongly feel that it should be protected from this 'proposal'.

Yours faithfully


Alan McQuaid
Chairman