

Guss O'Connell  
47 Palmerstown Green  
Co. Dublin

Date; 27<sup>th</sup> July 2023

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

Dear Sir,

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 be advised that you were not required to pay a fee to make this submission. Accordingly, a refund of €50 will be issued to the card used to make the payment.

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.

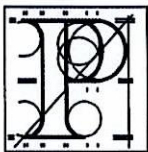
Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-873 7184

AA02

Tel	Tel	(01) 858 8100
Glaao 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



An  
Bord  
Pleanála

## SID Online Observation

### Online Reference

SID-OBS-000967

### Online Observation Details

**Contact Name**  
Guss O'Connell

**Lodgement Date**  
07/07/2023 19:00:47

**Case Number / Description**  
314942

### Payment Details

**Payment Method**  
Online Payment

**Cardholder Name**  
Augustine O'Connell

**Payment Amount**  
€50.00

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€ 50:00

Lodgement No

LDG— 065116-23

Reason for Refund

NO FEE REQUIRED

Documents Returned to Observer

Yes  No

Request Emailed to Senior Executive Officer for Approval

Yes  No

Signed

*[Signature]*

EO

Date

27/07/23

### Finance Section

Payment Reference

ch\_3NRixXB1CW0EN5FC0qPdYVZz

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

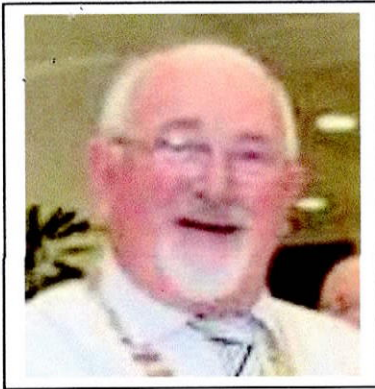
SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date



**COUNCILLOR GUSS O'CONNELL**

**PEACE COMMISSIONER**

**REP FOR PALMERSTOWN & NORTH CLONDALKIN**

An Bord Pleanála,  
24 Marlborough Street,  
Dublin 1

**AN BORD PLEANÁLA**

LDG- \_\_\_\_\_  
ABP- \_\_\_\_\_

**05 JUL 2023**

Fee: € \_\_\_\_\_ Type: \_\_\_\_\_  
Time: \_\_\_\_\_ By: POST

**Re BusConnects Lucan To City Centre Corridor Scheme, ABP -314942-22**

I am in receipt of your letter of the 6<sup>th</sup> June 2023. I note with regret that you have rejected mine and others request for an Oral Hearing. As a public representative living in Palmerstown I now wish to comment on the NTA Observations (May 2023) on my own and similar submissions.

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Taken individually and collectively they provide an accurate grass roots description of the current situation and the effects of implementing the scheme as proposed. As I have made a comprehensive submission already, in the absence of an opportunity to make a detailed oral rebuttal of the response of the NTA, I now only summarise my main points.

1. I welcome the serious attempt being made to provide a public transport system for Dublin and, I can bear witness that the C Route is a vast improvement on what it replaced.
2. The 26 Service (to be 80) has improved 100% and is now very reliable and efficient. It is tangential to the main C route leaving/joining the main C Route at Palmerstown (the 26 Terminus is shared with the G Spine at Liffey Valley Shopping Centre).
3. The proposal to run the 26 (80) into and out of Palmerstown Village and Old Lucan Road will destroy an excellent service. There is no demand for such a diversion, and I have not met one person that would welcome it. On the other hand, there is serious public concern and anger at the damage such a move would entail.
4. Maintaining the 26 (80) service from Kennelsfort Upper direct to and from the R148 eliminates the traffic hazard and safety risks associated with the proposals for the Oval junction. Leaving the Oval pedestrian crossing at the current location will eliminate the need to remove the left slip lane from the Oval.
5. Maintaining the 26 (80) service to and from Kennelsfort Upper direct to and from the R148 means people from Palmerstown Drive, Culmore Road and adjacent roads as well as Glenaulin Estate and the lower end of Oak Court Estate can have access to and from Chapelizod where many have family connections, friends in a nursing home or frequent the Doctors Surgery and can access the Phoenix Park.

6. Maintaining the 26 (80) service to and from Kennelsfort Upper direct to and from the R148 means residents of Chapelizod can gain access to the Palmerstown Credit Union (which serves Chapelizod) and the Doctors Surgery on Manor Road.
7. If the suggested alternatives to the dedicated cycleway through the Old Lucan Road are not taken up, the Old Lucan Road does not require other than traffic calming to improve it for cyclists and pedestrians.
8. The proposal for a surface (pedestrian) crossing and no left turn East at the R148/Kennelsfort Road junction should be dropped. Both will cause unnecessary congestion, undermining the Bus service, with added pollution and CO2 gases for no gain. Cyclist cross safely at present with motorised vehicles and there is ample space to provide a more user-friendly gradient to the footbridge thus facilitating pedestrians and providing better access/egress to the C Spine services on the R138 in both directions.
9. Despite the support of South Dublin County Council for the elimination of left-hand slip roads generally, the one at Upper Kennelsfort Road onto the R148 should be retained and improved to relieve the congestion on Kennelsfort Road Upper thus freeing up the Bus Service. The policy of eliminating left slip lanes needs to be applied where helpful, but like many policies can have exceptions. This is one such exception. In time, left-hand slipways can be eliminated. But there has to be a lead-in period. (This is in line with the objectives of the South Dublin County Development Plan 2022-2028 SMI Objective 1 "To achieve and monitor a *transition* to a more sustainable travel modes including walking, cycling and public transport....." Italics and emphasis are mine.
10. The proposal to locate the construction service site on the green area to the rear of the Old Lucan Road residential area east of Kennelsfort Road is totally unacceptable and untenable. The Developments Application Unit (Housing), Wexford submission endorses the strong case made by numerous Palmerstown contributors that there is an active Badger site located here and in addition it is a valuable and essential soak pit for the area. There are other better locations e.g. at the Council owned land at the Deadman's Inn.
11. The proposed traffic merging plan heading west from the R148/Kennelsfort Road junction is totally impractical. Traffic exiting right from lower Kennelsfort Road and travelling towards the M50 South, mixing with traffic coming from the City wishing to go North or South on the M50 and/or straight ahead to the N4, mixing with traffic coming from Kennelsfort Road Upper wishing to access the M50 North all in a very short space of road is a recipe for disaster and will cause further congestion on the R148 between the Oval and Kennelsfort Road and on Upper and Lower Kennelsfort Road, The present road lay out works for all traffic including buses and should remain.
12. The ABP should factor in the objective in the South Dublin County Development Plan 2022-2028 for a segregated, or similar, junction at the R148/Kennelsfort Road junction. This has to be in the medium to long term interest of a sustainable public transport system for Dublin.
13. It should be noted, 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." Unless the observations and proposals made by Palmerstown organisations and residents are taken on board by ABP, this objective will not be achieved.
14. **Summary, The NTA has failed to justify routing the 26 (80) service through Lower Kennelsfort Road and the Old Lucan Road or the serious disruption to Village life and ambiance it would cause with no positive outcome. The NRA has not justified a dedicated cycleway through the Old Lucan Road when at present this cul de sac is a safe zone for cyclists and pedestrians. The NRA has not addressed the arguments put forward in the numerous submissions that the proposed Toucan crossing and associated works at the R148/Kennelsfort Road junction is both unnecessary, a safety hazard and disruption to both the C Route and the 26 (80) Services as well as National Buses.**

The NRA has not defended the need to have the construction compound on the green space east of Kennelsfort Road. The NRA has not justified the proposed removal of the 18 Bus service. It may be outside the scope of the current ABP review, but it comes within the objective "Section 2.1 of EIAR Chapter 2 Need for the Scheme" as set out at 10 above.

15. The NTA has responded to many of the submissions by stating that the proposals, such as the 26 (80) Service down the Old Lucan Road, have been part of the plan over several of the preparatory stages. Where introduced, it has always been rejected as my submission of the 16<sup>th</sup> December 2020 shows (as may not be available to the ABP), See Appendix 1 (below).

I respectfully request that An Bord Pleanála take heed of the views, concerns and recommendations of the organisations and people of Palmerstown when considering and deliberating on the BusConnects Lucan to City Centre corridor scheme ABP-213942-22

Yours truly

  
Guss O'Connell MCC

Peace Commissioner. 4<sup>th</sup> July 2023

Appendix 1 Re BusConnects Lucan To City Centre Corridor Scheme, ABP -314942-22



**COUNCILLOR GUSS O'CONNELL**

**PEACE COMMISSIONER**

**REPRESENTATIVE FOR PALMERSTOWN NORTH CLONDALKIN**

#### **PUBLIC CONSULTATION FOR BUSCONNECTS**

**REF: Lucan to City Centre (CORE CORRIDOR 6) and Liffey Valley to City Centre (CORE CORRIDOR 7)**

**OVERVIEW:** As a public representative on South Dublin County Council, I welcome the decision of the NTA to address the need for an effective and working Public Transport System for Dublin. In particular, I welcome the BusConnect initiative and have supported the general strategy since attending the first workshop in Tallaght in 2018 during my period as Mayor of South Dublin County. I have attended and contributed all the public consultations and the special presentations for elected members over the past two years which have been most helpful and informative. My interests and concerns encompass services across the whole County, but I confine my remarks in this instance to Core Bus Corridors 6 and 7. I comment on them jointly as they will service the electoral area I represent and which I know best.

I want to preface my comments at this point by stating that I fully endorse and support the submissions made by the Riversdale Riverview Old Lucan Road Residents Group (RROLR) including the extensive one of the 7<sup>th</sup> December 2020. I will not repeat here the detailed and accurate arguments they make but I can vouch for and verify the accuracy of their submissions.

**In General:** I am aware that the present round of consultations centres on the necessary infrastructure that will facilitate the proposed network but I also believe that both strategies are interlinked. During the recent public consultations, it would appear from the answers we got to the serious questions we raised especially about the

unexpected change to Route 80, that the routes are already decided. Even though, as argued forcibly by the (RROLR) the proposal to drive the 80 route through Palmerstown Village which appeared at a late stage and without warning will cause considerable and unnecessary and untold damage to the Village and its residents. This decision must be revisited and reversed.

I have worked with various Government proposals for addressing Dublin traffic and transport since the late 80s and I believe that BusConnect represents a serious attempt to provide a sustainable public transport service. Consequently, I am disappointed that while it claims to take a radical approach and address serious questions, I find that it fails to address the bigger picture: An integrated Transport Plan. Yes, it provides for an element of "linked up" planning as in ticketing, but it fails to recognise the needs of commercial traffic as evidenced at certain junction such as at Ballyowen Road/Lucan Road and Kennelsfort/R148.

It may be "BusConnect" but it is not "Public Transport Connect". Neither Core Corridors 6 or 7 provide for the (promised) Luas for Lucan. For example, planning for a Bus Gate at the Bridge on the Coldcut Road instead of widening the Bridge and making provision for the Luas. Again, it fails to provide for commercial traffic and by restricting the Coldcut Bridge it is strangling the main route to Cherry Orchard Industrial Estate and Park West and in the process putting undue pressure for rat running by heavy trucks through the Kennelsfort Road residential area..

**Route 80:** As indicated above, this service which replaces the existing 26 and to an extent the 18, will serve no purpose by entering Palmerstown Village. The (RROLR) group have expounded the case against the proposal and this decision must be rescinded. The noble objectives set out in the BUConnect strategy of saving journey times, tackling the challenges of climate change and enhancing urban realms are set at naught by the decision to drive a City Bound Bus service through the Heritage Village of Palmerstown. It negates the objective of increasing the efficiency of the public transport service.

This decision, if proceeded with, has the potential to add 15 or 20 minutes travel time to the 80 Bus Service in both directions. In addition, it will clog up other traffic and seriously raise CO2 emissions in a residential area that is already suffering due to the lack of a segregated junction at Kennelsfort Road/R148 and Oval/R148 junctions. In addition, Buses branching right at the Oval on the outward journey will create an additional wait time for R148 traffic in both directions with the resultant dwell periods causing further pollution for residents of the Village, Palmerstown Avenue and Palmerstown Drive. This proposal if delivered on with the prohibition of city bound traffic exiting the Village at Lower Kennelsfort/R148 junction, will mean a build-up of traffic at the Oval/R148 junction thus adding to Bus travel times.

At present, residents and visitors to Plamerstown Village have access to public transport and bus stops to and from the City within 100 metres, while residents further down the Lucan Road at Holliville and estates off the Lucan Road (that are currently served by the 18 Route) are 0.7 Km from the nearest bus stop. Similarly, as a public representative I find myself called upon to defend a 0.7 Km journey from Glenpark Close to the nearest Bus stop, 0.7Km from Glenaulin Green, 0.4Km from Whitethorn Park, 0.5Km from Palmers Green and 0.6Km from the Traveller Residential site on the Cloverhill Road (a road that also has two Prisons and a Courthouse and no Bus Service) all within the Palmerstown Community of 3,400 homes. In the face of these journey times how can the serious disruptions to life in Palmerstown Village to facilitate the 80 Bus route (as described so vividly by the (RROLR) group be justified?

The proposed arrangements for traffic and cyclists at the Kennelsfort Road/R148 Junction are impracticable and will further detain traffic unnecessarily on both the R148 and Kennelsfort Road Upper and Lower. Again, the case had been made very eloquently by the (RROLR) group in successive observations and their submission of the 7th December 2020. While Toucan crossings have merit, this is not a suitable location. The alterations to the pedestrian bridge are to be welcomed and should the Toucan go ahead it will lead to a serious safety hazard for pedestrians and does not make sense given the proximity of the Overbridge. No account seems to have been taken of the intention, as expressed in both the County Development Plan for a segregated junction at this point and of the provision in the 2021-23 Capital Budget to this end for a feasibility study into upgrading this junction.

**Cycleways:** The attention to the promotion of walking and cycling throughout the BusConnect Strategy is to be commended and I fully support it. I would hope that the delivery is coordinated with that of the South Dublin County Council cycleway plans. However, it is difficult to justify the proposed Segregated cycle track along the extent of the Lucan Road through Palmerstown Village and residential area (This part of the former main road from Dublin to the West, is wrongly referred to as the 'Old Lucan Road'. Further on the West of the M50 it is referred to as the Lucan Road, which it is). This Palmerstown road is a cull de sac, providing local access for several commercial premises, a Church, residential housing and a number of housing estates. It is eminently qualified for Quiet Street Treatment as defined in the BusConnect Strategy. There is no justification for the level of disruption to the quality of life for residents of the area, which they would have to endure, so that the proposed segregated cycle track could go ahead. The road should have (additional) suitable traffic calming measures installed and then it will provide an ideal route in both directions for cyclists as well as for pedestrians and other road users.

While Upper Kennelsfort Road does not attract any attention from Bus Connect other than the proposed Toucan crossing, the Bus route and the cycleways would greatly benefit by BusConnect lending its support for a 3.5T restriction, as is applied to Ballyfermot Road of which it is an extension, as it is a vital local connection between Core Bus Corridors 6 and 7. The road is already suffering from over trafficking and a regular cause of disruption and delay to Bus services.

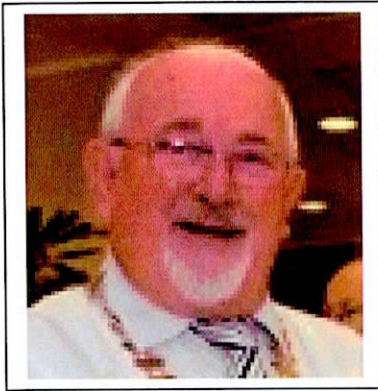
I trust that these observations and suggestions will be taken into consideration when the final plans are being agreed for both Core Corridor 6 and Core Corridor 7.

Yours truly,

*Guss O'Connell PC*

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16<sup>th</sup> December 2020



## COUNCILLOR GUSS O'CONNELL

PEACE COMMISSIONER

REP FOR PALMERSTOWN & NORTH CLONDALKIN

47 PALMERSTOWN GREEN, 087 68 38 254 [goconnell@clrs.sdublincoco.ie](mailto:goconnell@clrs.sdublincoco.ie)

AN BORD PLEANÁLA

0 / JUL 2023

LTR DATED \_\_\_\_\_ FROM

EMAIL/POETAL

LDG- \_\_\_\_\_

ABP- \_\_\_\_\_

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1

Re BusConnects Lucan To City Centre Corridor Scheme, ABP -314942-22

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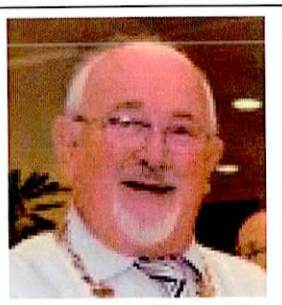
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This decision, if proceeded with, has the potential to add 15 or 20 minutes travel time to the 80 Bus Service in both directions. In addition, it will clog up other traffic and seriously raise CO2 emissions in a residential area that is already suffering due to the lack of a segregated junction at Kennelsfort Road/R148 and Oval/R148 junctions. In addition, Buses branching right at the Oval on the outward journey will create an additional wait time for R148 traffic in both directions with the resultant dwell periods causing further pollution for residents of the Village, Palmerstown Avenue and Palmerstown Drive. This proposal if delivered on with the prohibition of city bound traffic exiting the Village at Lower Kennelsfort/R148 junction, will mean a build-up of traffic at the Oval/R148 junction thus adding to Bus travel times.

At present, residents and visitors to Plamerstown Village have access to public transport and bus stops to and from the City within 100 metres, while residents further down the Lucan Road at Holliville and estates off the Lucan Road (that are currently served by the 18 Route) are 0.7 Km from the nearest bus stop. Similarly, as a public representative I find myself called upon to defend a 0.7 Km journey from Glenpark Close to the nearest Bus stop, 0.7Km from Glenaulin Green, 0.4Km from Whitethorn Park, 0.5Km from Palmers Green and 0.6Km from the Traveller Residential site on the Cloverhill Road (a road that also has two Prisons and a Courthouse and no Bus Service) all within the Palmerstown Community of 3,400 homes. In the face of these journey times how can the serious disruptions to life in Palmerstown Village to facilitate the 80 Bus route (as described so vividly by the (RROLR) group be justified?

The proposed arrangements for traffic and cyclists at the Kennelsfort Road/R148 Junction are impracticable and will further detain traffic unnecessarily on both the R148 and Kennelsfort Road Upper and Lower. Again, the case had been made very eloquently by the (RROLR) group in successive observations and their submission of the 7th December 2020. While Toucan crossings have merit, this is not a suitable location. The alterations to the pedestrian bridge are to be welcomed and should the Toucan go ahead it will lead to a serious safety hazard for pedestrians and does not make sense given the proximity of the Overbridge. No account seems to have been taken of the intention, as expressed in both the County Development Plan for a segregated junction at this point and of the provision in the 2021-23 Capital Budget to this end for a feasibility study into upgrading this junction.

**Cycleways:** The attention to the promotion of walking and cycling throughout the BusConnect Strategy is to be commended and I fully support it. I would hope that the delivery is coordinated with that of the South Dublin County Council cycleway plans. However, it is difficult to justify the proposed Segregated cycle track along the extent of the Lucan Road through Palmerstown Village and residential area (This part of the former main road from Dublin to the West, is wrongly referred to as the 'Old Lucan Road'. Further on the West of the M50 it is referred to as the Lucan Road, which it is). This Palmerstown road is a cull de sac, providing local access for several commercial premises, a Church, residential housing and a number of housing estates. It is eminently qualified for Quiet Street Treatment as defined in the BusConnect Strategy. There is no justification for the level of disruption to the quality of life for residents of the area, which they would have to endure, so that the proposed segregated cycle track could go ahead. The road should have (additional) suitable traffic calming measures installed and then it will provide an ideal route in both directions for cyclists as well as for pedestrians and other road users.

While Upper Kennelsfort Road does not attract any attention from Bus Connect other than the proposed Toucan crossing, the Bus route and the cycleways would greatly benefit by BusConnect lending its support for a 3.5T restriction, as is applied to Ballyfermot Road of which it is an extension, as it is a vital local connection between Core Bus Corridors 6 and 7. The road is already suffering from over trafficking and a regular cause of disruption and delay to Bus services.

I trust that these observations and suggestions will be taken into consideration when the final plans are being agreed for both Core Corridor 6 and Core Corridor 7.

Yours truly,

*Guss O'Connell PC*

Guss O'Connell PC

16<sup>th</sup> December 2020