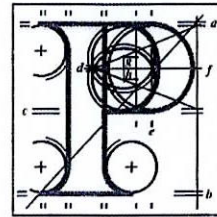


Our Case Number: ABP-314942-22



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**An
Bord
Pleanála**

Margaret Cosgrove
37 Turret Rd
Palmerstown
Dublin 20

Date: 10th July 2023

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

Dear Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned case. The contents of your submission have been noted.

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

CH08

Teil	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

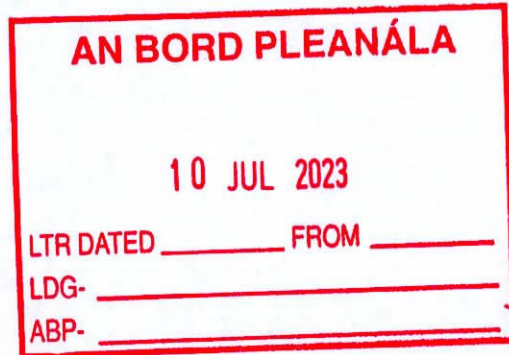
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Baile Átha Cliath 1	Dublin 1
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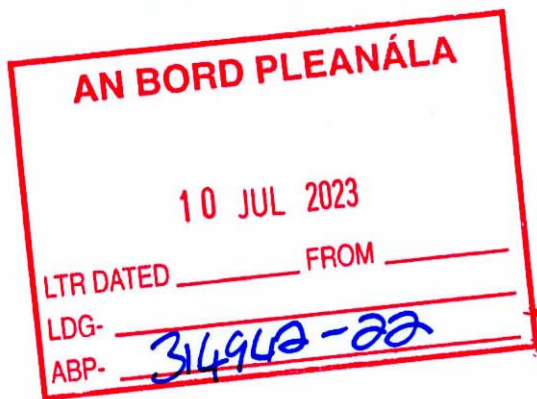
From: M C [REDACTED] <[REDACTED]@[REDACTED].com>
Sent: Sunday, July 9, 2023 6:59 PM
To: Appeals2 <appeals@pleanala.ie>
Subject: Case no. ABP314942-22

A Chara,
Having been invited by the Board to respond to the submission made by the NTA on the BusConnects Lucan to City centre corridor, I attach my new submission below.

Is mise le meas

Margaret Cosgrove





Case Number ABP-313942-22

Margaret Cosgrove

37 Turret Rd

Palmerstown D 20

Re BusConnects Lucan to City Centre Bus Corridor Scheme
Submission

1. Re Routing of Bus services through the Village.

I note that the NTA response to this point argues that “the provision, or removal, of bus services, as well as the routes of these services, is not part of the scope of the Proposed Scheme planning application.”

However, since a considerable portion of the plans include significant physical changes in the road network to accommodate the decision to change the bus route of the 26/80 bus, it can be argued that that choice does come within the remit of ABP.

The plan includes a “right turn lane is proposed on the R148 Palmerstown bypass to facilitate new bus services through Palmerstown village” as well as changes to the layout of the junction of the Old Lucan rd. and the R 148. These changes are necessary only due to the change of bus route.

Consequently, NTA Bus Connects should be asked to provide detailed evidence of the necessity of this change, including projected numbers of new passengers (not diverted from existed route) anticipated to use the new bus stops on the Old Lucan Road.

I note that the NTA BusConnects response quotes generic extracts of the rationale of the plan (eg. “NTA prepared the Core Bus Network...which identified those routes on which there needed to be a focus on high capacity, high frequency and reliable bus services, and where investment in bus infrastructure should be prioritised and concentrated.” They should provide the figures to support the inclusion of the Old Lucan Road as “high capacity”.

In addition the NTA Bus Connects response cites “ issues raised by over 72,000 submissions” as justifying the change of route. Can they be asked the precise number of these 72000 submissions which explicitly asked for the bus route to run along the Old Lucan Road?

In conclusion, the decision to change the route has many planning ramifications and therefore it is entirely the right of An Bord Pleanála to query that decision.

2. Re Temporary construction compound LU2

I note that in their response the NTA Bus Connects cite their justification for using the grassy knoll as; *'The Construction Compound locations have been selected due to the amount of available space, their relative locations near to the majority of the Proposed Scheme major works, and access to the National and Regional Road network'*.

This point does not indicate that any thought was given to location other than convenience. Given that in 2023 we are seeing both climate instability and biodiversity collapse, such 20th century criteria show a serious lack of awareness of 21st century problems and a desire to find easy answers that is indicative of the poor decision making which has brought us to our current crisis.

I note that the planners did finally decide to conduct an on site walkover survey on the 14th March and on that day did not find evidence of protected species on the specific footprint. The response does not report if local residents were asked to contribute longer term information.

The response notes that the trees to be removed are non-native beech trees and states that as such are not preferred by insects. Given that beech trees have been part of the ecology of Ireland for over 500 years this generalised classification is, at best, disingenuous. The Woodland Trust notes that beech trees are favoured by moth caterpillars and Biodiversity Ireland note that some insects in Ireland have adapted to Beech trees after the loss of Oak forests. They are not ecological deserts.

The NTA BusConnects notes that that the trees to be destroyed would be replaced by semi mature replacements . Can ABP ask are these replacements to be the same age and size as the felled trees? If so, have the costs of transplanting such large trees and supporting them after transplantation been taken into account in assessing the convenience of the site? Or, as seems likely, by "semi mature" do they mean the usual saplings that are produced to give the illusion of environmental concern when a habitat has been destroyed?

In addition, presumably the "semi mature" replacements are already growing in Ireland, so their planting on site would still be a net loss to the tree cover of the country and another example of Greenwashing.

I understand that this submission is unlikely to influence a project that involves large sums of money. I ask you simple to consider that there are other criteria in making good decisions.

Thank you for your time

Margaret Cosgrove