



Mary and David Ong  
52 Wheatfield Road  
Palmestown  
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,

Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

AA02

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**Shaun McGee**

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**From:** Sarah Caulfield  
**Sent:** Tuesday 11 July 2023 10:49  
**To:** davidong@eircom.net  
**Cc:** Shaun McGee  
**Subject:** RE: ref ABP-314942-22

Dear David,

The Board acknowledges receipt of your email and attached submission in relation to the above-mentioned application.

Kind Regards,  
Sarah

-----Original Message-----

**From:** David Ong <davidong@eircom.net>  
**Sent:** Monday, July 10, 2023 5:16 PM  
**To:** Bord <bord@pleanala.ie>  
**Subject:** ref ABP-314942-22

Dear Sirs,

We enclose submissions pursuant to your letter dated the 06/06/23 which we understand have to be in by 5.30 today.

Kind regards.

David Ong.  
Mary Ong.

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David Ong.

Mary Ong.

**PLANNING AND DEVELOPMENTS ACTS 2000-2021**  
**PLANNING AND DEVELOPMENT (STRATEGIC INFRASTRUCTURE) ACT 2006**

**STRATEGIC INFRASTRUCTURE DEVELOPMENT**

**PROGRAMME TITLE: BUS CONNECTS DUBLIN CORE BUS CORRIDORS  
INFRASTRUCTURE WORKS**

**PROPOSED DEVELOPMENT: LUCAN TO CITY CENTRE BUS CORRIDOR  
SCHEME**

**TO: THE SECRETARY,  
AN BORD PLEANALA,  
STRATEGIC INFRASTRUCTURE DIVISION,  
64 MARLBOROUGH STREET,  
DUBLIN 1, D01 V902.**

**REFERENCE NUMBER: ABP-314942-22**

**FURTHER OBSERVATIONS BY:**

**NAME: MARY ONG AND DAVID ONG,  
ADDRESS: 52 WHEATFIELD ROAD, PALMERSTOWN, DUBLIN 20.**

We wish to make the following Response to the Observations of the NTA Bus Connects made by letter dated the 15th May 2023 on the Proposed Development of the Lucan to City Centre Bus Corridor Scheme, at the Palmerstown area, as follows:

**2.1.3.1 Routing of Bus though the village**

We do not understand how the NTA can say 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. If Dublin Bus/NTA were to decide, following the making of this planning application, that the existing No 26 (80) bus route should not be changed (so it does not enter and exit the Village), and as there are no other bus routes using the Old Lucan road (east), then the entire planning application concerning the change of the layout at the Oval junction to facilitate a bus right hand turn into Palmerstown Village and construction works to achieve this, will be a complete waste of public money, not to mention the inconvenience and upheaval caused to the general public, road users and to residents of Palmerstown. It is essential at this stage to consider whether the proposed new route for the bus No 26(80) through Palmerstown Village is warranted at all having regard to the views expressed in the Submissions.

The EIAR Volume 2 Chapter 2 Need for the Proposed Scheme (and Section 2.2.1.4 in particular), already supports the existing “*high capacity, high frequency, and reliable bus services*” on the existing bus routes currently used by the C spine buses and the No 26. There is no need to contemplate any further changes to these services which are working very well. The proposed route change to No 26(80) through the village will not in any way improve their attractiveness as an alternative to private car usage (section 2.2.2 of Chapter 2) due to the closeness of the existing bus stops to the proposed new bus stops.

The NTA has referred to Section 4.1, and to the publication of the final preferred route option report of the Dublin Area bus network in 2019 with consideration given to over 72,000 submissions. The NTA has failed to disclose how many of the 72,000 submissions relate to the rerouting No 26(80) into the Palmerstown Village. The NTA has still not provided any evidence of support for the rerouting of the No 26(80) bus through the Village. The vast majority of submissions to this Planning Application on the No 26(80) bus service are against the re-routing of the No 26(80) through the Village.

In summary, the NTA has still failed to adequately address any of the concerns raised in our earlier Observation.

#### 2.1.3.2 Bus stop locations

##### Old Lucan Road

The NTA has referred to Section 4.6.4.5 of Chapter 4 Proposed Scheme Description of the EIAR. This Chapter is entirely consistent with our Observations. The NTA has still failed to explain how the removal of Seven existing bus stops in Palmerstown Village (ie on the Old Lucan Road (west) and Lower Kennelsfort Road) serving the more densely populated west area of Palmerstown Village, and replacing them with two proposed bus stops on the Old Lucan Road (east) in the Village serving the less densely populated east area of Palmerstown Village complies with Section 4.6.4.5. The proposed new stops on the Old Lucan Road (east) are not at the optimum location for the catchment area. Contrary to what has been alleged by the NTA, the greater catchment area in Palmerstown Village lies to the west of the Lower Kennelsfort Road.

The NTA has stated that it is not possible to have tail to tail bus stops on the Old Lucan Road. The existing bus stops on the Old Lucan Road (4 bus stops) already provided “tail to tail”. It is clear that the proposed new bus stops are incorrectly situated if tail to tail bus stops are not possible at the chosen location. With traffic being diverted down the Old Lucan Road (east) due to the implementation of the proposed no left turn at the Kennelsfort Road/R148 junction, plus additional traffic volumes being generated from the new large scale apartment complex on the old Vincent Byrne site onto the Old Lucan Road (east), it is wholly incorrect to say that “*the likelihood of two Dublin buses with short dwell times stopping at the same time in the middle of this link is low and the impact on traffic will be negligible*”.

The NTA have not adequately addressed the impact upon the architectural heritage of the proposed bus stops outside the Redcow Cottages, which are within an Architectural Conservation Area. Furthermore, the proposed footpath widening might not be feasible at this point for large vehicular traffic emerging from the Mill Road.

### The Oval (Bus Stops 2242 and 7239)

For reasons already set out in our Observation, the relocation of stop 2242 to the west of the Oval/R148 junction will be of great inconvenience to the bus users from Palmerstown and reduce their accessibility to the existing bus services and increase travel times, unless it incorporates the bus route 26(80) as it currently exists (ie without going into the Village).

A layby can be built at bus stop 7239 where it is currently situated without the need to relocate the bus stop closer to the junction.

### Bus Stop 2201

The NTA have raised 4 points concerning bus stop 2201. The NTA state that this bus stop is not paired with an inbound stop. There are no reasons to have an inbound stop across the R148 carriageway as there are no residences (catchment area) situate there. Depriving the large catchment area of south Palmerstown of an essential bus stop simply to achieve geometric symmetry is not a sound reason.

Similarly, there is not any need to have a pedestrian crossing at this point as the bus stop is catering for the large catchment area of south Palmerstown and who do not need to cross the R148. The guideline of a bus stop being situate within 100m of a pedestrian crossing cannot be an inflexible rule in itself - otherwise many bus stops all over the city will have to be discontinued.

Just because the preferred arrangement for a layby cannot be achieved without incurring further expense of land take, does not mean that an essential bus stop the large catchment area of south Palmerstown should be discontinued all together. There have not been any reported incidents at bus stop 2201 which calls for its discontinuance.

The NTA are saying that this stop is located in close proximity to the junction from the Oval junction which is served by a pair of bus stops at the Oval junction. This argument by the NTA of proximity to existing (or proposed) bus stops as a reason to justify the discontinuance of the bus stop 2201, is wholly inconsistent with the position adopted by the NTA that two new bus stops should be built on the Old Lucan Road notwithstanding that the new two stops will be even Closer in proximity to two existing (or proposed) bus stops on the R148.

The conclusion of the NTA appears to be that it is in order to inconvenience the large catchment area of south Palmerstown and increase the distances they have to travel to access a bus stop, and that somehow, this is in keeping with the stated Scheme objectives of providing the public with greater access to the bus services and making it more attractive to use bus services.

#### 2.1.3.3. Traffic Impact

##### Removal of the Left Turn Slip Kennelsfort Road Upper

The original proposal when the Chapelizod bypass was built was for a junction upgrade at the Kennelsfort junction as it was connecting onto a major artery the N4. The R148 also leads to M50 another major road artery. As there will not be an upgrade to the Kennelsfort junction, the very least which can be expected is maintaining the left turn slip from Kennelsfort Road Upper.

As the NTA have stated *"It is also recognised that the Palmerstown Bypass is a key radial route into the city centre from the M50 and there is a need to balance the competing demands of general traffic and bus priority at this local, particularly with the potential impact on M50 traffic"*. This would include the traffic from Kennelsfort Road Upper travelling toward the M50 and N4 which is a short distance away.

In all the circumstances, maintaining the left turn slip from Kennelsfort Road Lower would be justified notwithstanding anything in the EIAR and DMURS. Pedestrians do not travel west from the Kennelsfort junction towards the M50 and neither do cyclists, whose preferred cycle route to the N4 west is through Palmerstown Village (even without any upgrade to cycle route) or on the R148 if travelling east. There will be very little if any disruption to for pedestrians and cyclists by maintaining the left turn slip at this junction.

#### Banning the left turn from Kennelsfort Road Lower

It is submitted that if the proposed removal of the left turn slip from Kennelsfort Road Upper onto the R148 goes ahead (if it is deemed necessary), then the combined toucan crossing should be located at the west side of the Kennelsfort junction (similar to what is proposed at the Oval junction upon removal of the left turn slip). Pedestrians on the east of the junction will continue to have use the overhead pedestrian bridge which will otherwise become redundant if there is a toucan crossing directly below it. The proposed two way cycle track along Lower Kennelsfort Road to the R148 (if it is deemed necessary) should be moved to the west side of Lower Kennelsfort Road on the same side as the toucan crossing across the R148. There is more space to implement a two way cycleway at the west side of Kennelsfort Road Lower than on the east side of the road. On that basis, there is no reason to ban the left turn from the Village which will only cause severe traffic congestion in the Village. These observations as submitted by us represent *"the optimum layout that that balances the competing demands by enhancing bus priority improving pedestrian and cyclist infrastructure while still retaining appropriate capacity for the forecast the level of general traffic"*.

#### Removal of Left Turn Slip (The Oval)

Whilst it may be the objective of DGA Transport strategy to implement junction improvements to enhance movement by pedestrian and cyclists, there are two large primary schools located off the Oval/R148 junction. The increased traffic congestion up to the Oval/R148 junction (which will be the inevitable result if the left turn slip is removed), will adversely impact upon the health and safety of children who are either walking or cycling to school rather than improving it. This has not been adequately addressed by the NTA.

#### Impact of the right bus lane into the old Lucan Road.

The NTA have failed to address the core issues raised here as to why a right hand bus lane into the Old Lucan Road at the Oval junction is required at all. We have referred to this previously and at the beginning of this Response to the Observations, and that the proposed change to the bus No 26(80) route through the Village is not widely supported by the community and bus users in Palmerstown, and which changed route may result in fall off in users of the service from Palmerstown. The disruption caused by the Bus No 26(80) to traffic travelling west on the R148, moving from the bus lane on the left hand side of the R148 across 2 laneways of traffic to enter onto a right hand turn into Palmerstown Village at the Oval junction, and the associated costs of the CPO of the land of the Applegreen garage to construct

a short bus lane of about 30 metres long and to erect two bus stops for the No 26(80) within 200 metres of existing bus stops, is a complete waste of valuable resources and unjustified to facilitate one proposed bus service, the No 26(80) bus service through the village where good bus services already exist right next to it.

It is also submitted that a bus turning right at the Oval junction into the Village will impact with the entry and exit at Terry Shaws Tree Services, which we understand has its own layby constructed by SDCC pursuant to agreement following legal proceedings in the High Court. It is unclear from the proposal as to how NTA intend to preserve this layby with the construction of the proposed bus lane and widening of the pedestrian footpath thereat. The NTA was put on notice that there may be a legal agreement in relation to user of the layby but have not looked into the matter or requested production of same. An Board Pleanala are also on notice that there may be legal agreement in place.

It is submitted that the Key Changes from the Published EPR in relation to the bus only right turn at the Oval are not well thought out and have failed to take into account all relevant factors, and should be omitted entirely from the EPR.

#### Scheme Geometry

Please see paragraphs immediately above. The NTA also refer to Figure 2.1.3.3.7. and state that there is no evidence of an existing designated layby at this location. We have looked at Figure 2.1.3.3.7. and can clearly see the layby on the right hand side of the photograph, so we are at a loss as to how NTA can make such a submission. Perhaps there is a technical description of what is a "layby" comprises of which escapes us. However, that road section on the right of the photograph is used by vehicles exiting Shaw Tree Services to either turn left into the Village or reverse into that lane and exit via the Oval junction. As appears from the photograph, no other vehicles have access to that layby or lane except those emerging from Shaw tree Services.

Contrary to what has been stated by the NTA the existing access/egress arrangements for Shaw Tree Services will be affected by the proposals, and it will not be possible for buses to negotiate the existing 90 degree bend without a major change in the layout.

#### Loss of Parking/Parking Provision

The NTA have still not adequately addressed the loss of significant parking space in their Observations. Contrary to what has been portrayed, a significant number of houses and business do not have the option to park off street or at the rear. There will be also a huge demand for MORE parking spaces in the Village with the new large scale apartment development on the old Vincent Byrne site which has only limited car parking spaces provided. Perpendicular parking is not suitable especially if there is bus route through the village and if there is an increase in volume of traffic through the village as a result of the proposed scheme, and having regard to the turning circle requirements of large vehicles exiting and entering Mill Lane.

#### Proposed Cycle Track



We restate that the alternative cycle route which we have proposed is the optimum solution for a segregated cycle track under the Scheme. We are not proposing the cycleway pass into the SHD apartment development, but pass immediately outside its boundary wall. This will be sufficiently distant away from the R148 to be safe. This would be similar to a section of cycleway already on the N4 (near the Hermitage golf course), and is compliant with the national cycle manual width calculator. Cyclists can also easily access the toucan crossing at the Kennesfort junction without any disruption to the existing amenities on the Lower Kennesfort Road.

Our proposal would be to enter very end of the village (east) at the Oval junction outside Terry Shaws Tree Services and/or the Applegreen Service Station, and to continue to Chapelizod on the existing cycleway. Our proposal will result in minimal disruption to the Village, its character and existing amenities and parking. There is no need for a dedicated cycletrack within the Village itself which is very quiet and safe, and most of the cyclists from Lucan and further will be using the proposed dedicated cycletrack parallel to the R148. Our alternative proposal does meet the objectives of the GDA Cycle Network Plan. Contrary to what has been suggested by the NTA, no commercial land intake is required under this proposal and no businesses and development potential of residual commercial land is affected in any way.

Environmental concerns.

There are badger settings and bat colonies which need to be protected. The NTA are wholly incorrect in saying that there are no badger sets, and that the embankment is of little value to badgers. Photographs have been provided in some of the submissions. Local environment groups should be contacted as they are in a position to identify where the badger sets are situated.

**DATED: 10TH JULY 2023.**

**Signed:** \_\_\_\_\_  
**Mary Ong**

**Signed:** \_\_\_\_\_  
**David Ong**