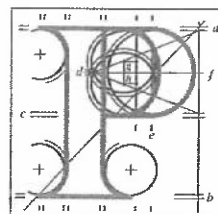


**Our Case Number:** ABP-314942-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Margaret Cosgrove  
37 Turret Rd  
Palmerstown  
Dublin 20

**Date:** 17 January 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 (including your fee of 50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Doina Chiforescu  
Executive Officer  
Direct Line: 01-8737133

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Observations on Statutory Planning Application for the Lucan to City Centre Core Bus Corridor Scheme.

Margaret Cosgrove

37 Turret Rd

Palmerstown

Dublin 20

1. Re Bus route 26/80 through Old Lucan Road and associated changes to road infrastructure, traffic signalling and road usage.

- How has NTA/Bus Connects ascertained the need for this service? The current bus stop at the Oval gives access to the residents of the eastern end of the Old Lucan road; and for those on the western side, the proposed new bus stop at Mill Lane would be just as far as the Kennelsfort rd Junction bus stop. The new route therefore has no new benefits and causes many difficulties. Have the NTA produced quantitative data showing that the people of the Old Lucan road want this service before they planned infrastructural changes to implement it? If so can that data be made available?
- Reading the map provided by NTA/Bus Connects, Stewarts' Care Palmerstown, which offers residential, day services, and educational services for people with intellectual disabilities, (<https://www.stewartscare.ie/work-we-do/overview/>) is marked as "Stewarts Hospital". Can you be assured that the NTA/Bus Connect have contacted Stewarts Care and have not simply looked at a map and assumed this is a general hospital requiring frequent bus access rather than a quiet, safe and non-polluting environment for residents and service users? Can the results of their factfinding at Stewarts care be made available?
- This plan proposes moving the current inbound bus stop from the eastern side of the junction of the Old Lucan Rd to the western side. This change of stop location, in conjunction with the change of route for the 26/80 has the effect of precluding all people south of the R148 from using that bus by making the distance to the bus stop far in excess of the Bus Connects 400m. This means that a large proportion of the bus- using population of Palmerstown will be using the C spine buses, along with the populations of Adamstown, Celbridge, Maynooth, Leixlip, and Lucan. Is this the intended outcome? Have NTA/Bus connects decided to ensure that the 26/80 should not be used by this proportion of people? If so, could the minutes of the meeting where this decision was made be made available? If this is not the intended outcome does this fit in with the bus of this scheme to increase the use of public transport by making it easier to use?

2. Biodiversity: LU2 and other areas.

- With reference to the proposed use of land north of R148 as a "temporary" construction 'dump': is there any evidence that an on-site biodiversity study was completed for this area? The report speaks of a desk study but there seems to be no on-site records. Given that there is local knowledge of badgers (a protected species)

in this area, this absence is important. The biodiversity report needs to be much more exact than a desk study unless it is merely a box ticking enterprise.

- The area of LU2 has semi mature beech trees which presumably will be felled for the “Temporary” construction site. These trees cannot be replaced when the “temporary” destruction is finished. Children born now will be adults before they see trees that of similar age and importance. The biodiversity report marks this type of habitat as “local importance: Higher value” but dismisses this as “not of geographical significance”. Given that one of the key drivers of biodiversity loss is change of land use (as reported by COP 15 Biodiversity 2022) every small change has a cumulative impact. Losing habitat for infrastructure is problematic; destroying habitats for “temporary” construction storage indicates lazy planning and makes a nonsense of biodiversity reports in plans like this.
- The cumulative effect of habitat loss over the whole construction area is addressed in the plan – but again does not actually deal with true cumulative effects. The plan notes that over 2000 m of hedgerow will be destroyed. It acknowledges that South County Dublin aims to protect “existing ecological features including tree stands, woodlands, hedgerows” but does not give any evidence of how many kilometres of hedgerow have been destroyed in plans which, like this, note their importance but then decide “not of geographical significance” or “minimal impact”. Again, lip service is being paid to biodiversity by giving the impression that impacts are being examined but not actually acting on them.
- The Natura report notes that some habitats in the plan area are of low value. I contend that this is because they have not had time to grow. The R148/N4 was widened in 1984, felling trees and hedgerows and destroying habitats. The few areas replanted were felled twenty years ago when the road was last widened. Now this plan proposes felling the twenty year old trees. It is a sign of bad planning to have a country of saplings. It shows planners incapable of moving beyond 1960s planning ideas, to ones which include real efforts to support biodiversity rather than stick in a few trees in the model/plans and call it nature. Given that the plan fatalistically notes that “The majority of these habitats are located adjacent to the existing roadway and are highly disturbed and typically fragmented in nature. Given the location of the Proposed Scheme and the on-going urban development trends across Dublin, there is likely to be continued habitat loss and fragmentation.”, there seems to be no effort to actually think creatively to stop this happening.
- I understand that these observations on biodiversity loss will be ignored, as have any other efforts to protect ecosystems over the last fifty years. I also note that over the last fifty years Ireland has lost 70% of its insect population and that practically all of the birds mentioned as being effected by this plan are at either amber or red risk. Constant decisions to remove habitats for being in the way of “temporary” facilities or fell trees to make space for more concrete have succeeded in pushing most species, other than us, into risk of extinction. The Secretary of the UN, Antonio Guterres has called humanity “weapons of mass extinction” and we all play a part, and the decisions we make, whether large or small, matter.

Today, in 2023, a child born now will definitely have a worse life than we have had, mostly due to the decisions made over the last fifty years. I am submitting these

observations on biodiversity loss caused by this plan so that at least I can say to them that I tried. What will you say?

