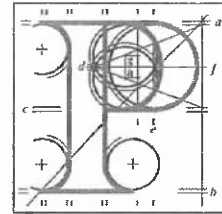


Our Case Number: ABP-314942-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Mairéad Harrington
151 Wheatfield Road
Palmerstown
Dublin 20
D20 XR89

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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Mairéad Harrington
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Dublin 20
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10th January 2023

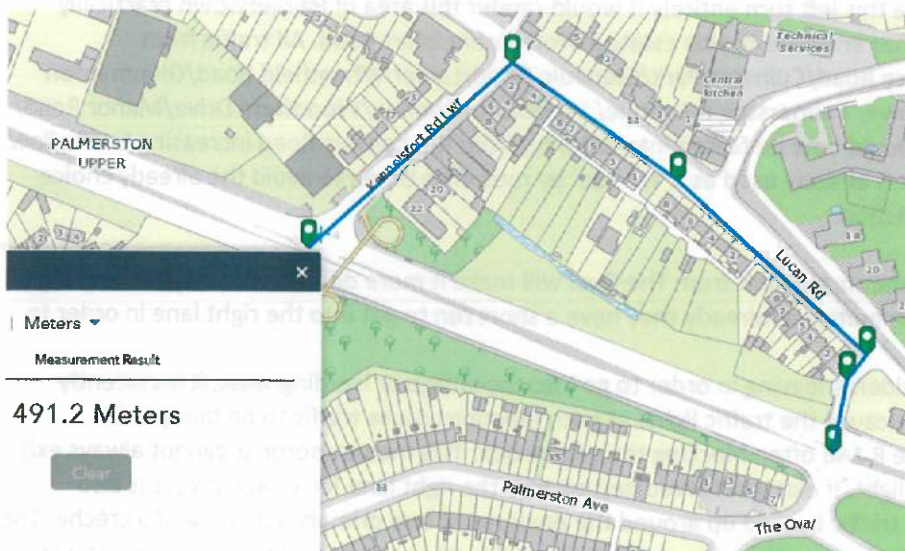
Reference: HA29N.314942
314942: Lucan to Dublin City Centre
BusConnects Lucan to City Centre Core Bus Corridor Scheme

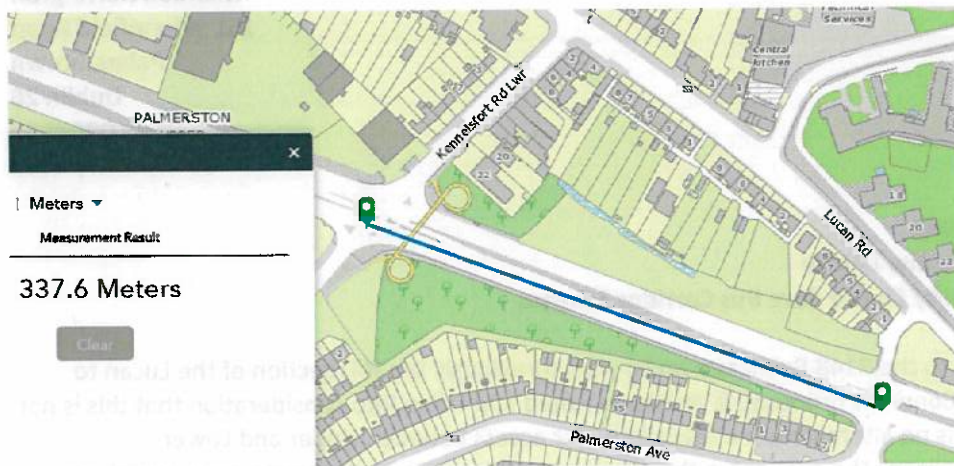
This submission relates to the R148 Palmerstown by-pass (previously the N4) section of the Lucan to Dublin City Centre Bus Connects proposal. It should be noted and taken into consideration that this is not a true by-pass as there is no alternative route available for access between Upper and Lower Palmerstown and Chapelizod. The changes in the proposal to this section are unnecessary, unwelcome and unintuitive to both local residents of the community and any road user wishing to exit Dublin to the West of Ireland. It is unfortunate and disturbing that the NRA consider this proposal acceptable. The NRA absolved their interest in this areas when they downgraded this road section from a National to a Regional road around 2011/12.

Background:

The construction of the N4 Palmerstown By-pass now downgraded to the R148 had a detrimental effect on the quality of life for the residents of Palmerstown. The scheme effectively divided the community in two with the village and associated amenities on the North side of the road and a large amount of residents living on the Southern side of the road. There is no alternative local access for residents to access the village except to use and/or cross the R148 to access our village. This obstructs access to amenities including Waterstown Park, Shopping, Veterinary Clinic, Church, pub, restaurants, sports centres etc.

The majority of the changes in the proposal and the resulting disruption it will have for both residents and anyone trying to use the R148 (the main route to Ireland West from Dublin) are caused by the desire to reroute a single bus route, the current 26 route (to be renamed route 80) as per images below. The rerouting achieves an additional 153 meters of length to be covered by this bus route with the loss of 3 bus stops (as existing) in one direction (stop 2201, 7239 & 4401), two in the other direction (stops 2241 & 2242) while only providing one bus stop in either direction (as per proposal).





Our concerns with the proposal are as follows:

1. Removal of the bus stop No. 2201 at the Circle K garage/Palmerstown Drive.

This bus service is a vital service to the residents.

The Bus Connect scheme is supposed to improve bus services and sustainable transport options but removal of this bus stop does not achieve this aim. This stop is used extensively by the residents of Palmerstown Drive/Culmore Road/Culmore Park/Glenauin Road/Wheatfield Road/Glenmaroon Road/Glenmaroon Park and pedestrians accessing Ballyfermot. These include school children and college students accessing Lucan/Celbridge/Maynooth schools and colleges and the many elderly residents that live in this part of Palmerstown. If removed the residents will be required to use the next bus stop (No. 7239) which will require the negotiation of crossing an additional busy junction at The Oval. This is unacceptable for young children and elderly.

Residents existing the Oval junction travelling into the village to access amenities will have to navigate 2 additional pedestrian crosses and cross 2 lanes of traffic which already is a traffic nightmare at peak times. The removal of the filter light tuning left from the Oval will further compound this issue.

2. The Oval Junction

The proposal suggests a continuous bus lane on the R148 from City Centre approaching Oval Junction. A continuous bus lane leaves no provision for motorists entering the housing estate at The Oval. Motorists will be left sitting in the middle lane (waiting for clearance in the proposed bus lane) and hold up traffic travelling straight while waiting to try and navigate turning left at this junction into the neighbourhood. The existing left slip at this junction turning left into the Oval needs to remain as is.

If the proposal is to remove this left turn entirely it would render this area of Palmerstown practically inaccessible as the only other entrance to this estate is from Kennelsfort Road. All traffic from Palmerstown Drive/Culmore Road/Culmore Park/Glenauin Road/Lower Wheatfield Road/Glenmaroon Road/Glenmaroon Park/Lower Palmerstown Avenue/ Woodfarm Avenue/Woodfarm Drive/Manor Road/Manor Park/Turret Road would now be forced into entering from Kennelsfort Road increasing traffic flow in this residential area that is already used as a 'rat-run' by motorists trying to avoid the already choice Kennelsfort Road/R148 junction.

The removal of the filter lane turning left from The Oval will make it more difficult for people travelling into the village to access amenities as already they have a short run to get into the right lane in order to turn right into the village.

At peak time traffic for residents leaving in order to go into the village or heading west, it is currently nearly impossible to exit because the traffic lights at both junctions cause traffic to be bumper to bumper, with traffic on the R 148 often blocking the yellow box. This means motorist cannot always exit the junction on the green light. If exit is achieved getting into the right lane for village access is also difficult. The result will be traffic backed up around the environs of two primary schools and a crèche. The addition of the proposed Pedestrian Crossing at this point will further compound this problem., as will

the proposed pedestrian crossing under the pedestrian footbridge at the Kennelsfort Road junction. Currently only 3-4 vehicles can turn right at this junction into the village per light sequence.

The use of the green space adjacent to the Oval for storage and plant during construction needs serious consideration. This is already a busy and dangerous junction adjacent to the local primary schools. Allowing traffic to travel straight from the Oval Junction into the village would be a solution to this issued but this is not accommodated for in the proposed plan.

2. Bus No. 80 (replacing No. 26)

This does not need to enter the village as the deviation of 150 meters approx. will cause untold traffic chaos in the local community and considerable expense to the tax payers.

Residents in the Riversdale/Hollyville/Palmerstown Lower areas have voiced a preference to leave the bus services as are i.e. all serviced from the existing bus stops on the R148. Leaving the bus service and bus stops on the existing R148 provides more choice of services (and therefore destination). Additional timetabling of buses on these routes would be more of an advantage than that of splitting the location and route of services which only diminishes the user's choice. The splitting of route 26/80 from the C1/C2/C3 bus stops diminishes service and choice for bus users. The provision of 1 new bus stop in either direction in the village does not compensate for the number of bus stops lost in the proposed scheme, 3 bus stops (as existing) traveling in a westerly direction (stops 2201, 7239 & 4401), and two travelling easts (stops 2241 & 2242).

3. Removal of Bus No. 18 and proposed changes at Kennelsfort road R148 Junction

This Bus route services Hospital staff, Hospital service users and local residents accessing Ballyfermot and beyond. The removal of the 18 Bus route, one of the few original orbital routes in Dublin is in contradiction to the aim of improving the bus services in the area as this route acts as connection to numerous bus routes servicing the greater Dublin area and beyond. This route is used extensively by many to access schools, colleges, hospitals, work as well as for social reasons. The 18 route should remain a vital part of the Bus Connects network.

The removal of the left turn at junction R148 from the village at Kennelsfort Road is again hindering the community from the use of facilities in their village and will compound traffic chaos in the area. Residents need to have better access to enter and exit the village not less. The result will be that all traffic exiting Palmerstown Lower wishing to travel east will be required to exit at the exit behind the Apple Green service station opposite the Oval junction. This will compound traffic issues at this junction and will cause delays to the proposed 26/80 bus service if the nonsensical deviation of this route goes ahead.

The removal of the left filter light from upper Kennelsfort road onto the R148 will cause further traffic backlog and traffic issues on Kennelsfort Road. This will only serve to delay the 26/80 bus service and not improve its timeliness. The addition of a pedestrian crossing at this point is unnecessary as the proposed crossing is directly under a pedestrian footbridge.

Furthermore, these plans appear to have been devised on information prior to and/or make no reference to the additional 250 apartments and associated 125 parking spaces that have been constructed and are yet to be occupied, on the former Vincent Byrne site (adjacent to the Kennelsfort Lower / R148 junction). Prior to the building of these apartments the number of residential units in the Lower Palmerstown area was in the region of 300. This proposal seeks to diminish access and exit to the Lower Palmerstown area while almost doubling the residential units that will be occupied.

The proposed Horizontal Parking in the village around Red Cow cottages does not accommodate Service users of Stewarts Hospital or the elderly living in these cottages who need wheelchair/ ambulance/ modified vehicle access. The current parallel parking allows for this access.

The removal of parking on the north side of the Old Lucan road is unnecessary. There is no provision for parking to replace the removal of parking on the north side of this route. In particular parking at the Parish Church, needs to be considered, provided for and not removed. There is ample space to provide for both parking and a cycle way in this area. All of these proposals are removing access for people within the community who already have to navigate a very busy road cutting through our community.

Removal of parking on the east of Lower Kennelsfort road to facilitate a cycle lane of 160 meters is unjustified as they cycle lane end abruptly at the R148 – a danger to cyclists.

4: Reduction to a single lane on N4 over M50 Junction

This is an unwelcome and unnecessary proposal on what is the main artery to the West of Ireland from Dublin City. Such a move will cause massive traffic congestion further degrading the air quality in this already poor air quality zone.

As lifelong residents of Palmerstown we welcome more and direct buses into and out of the city but not at the costs of seriously affecting the lives of Palmerstown residents. We trust that An Bord Pleanála will consider these substantive points in your assessment of this application as the impact if implemented as per current plans will be profoundly detrimental to the residents of Palmerstown.