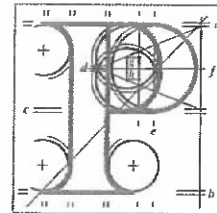


**Our Case Number:** ABP-314942-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Cllr. Alan Hayes  
38 Riversdale Avenue  
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

|                           |                |  |
|---------------------------|----------------|--|
| <b>Tel</b>                | <b>Tel</b>     | (01) 858 8100  |
| <b>Glaó Áitiúil</b>       | <b>LoCall</b>  | 1890 275 175   |
| <b>Facs</b>               | <b>Fax</b>     | (01) 872 2684  |
| <b>Láithreán Gréasáin</b> | <b>Website</b> | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| <b>Ríomhphost</b>         | <b>Email</b>   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

|                      |                       |
|----------------------|-----------------------|
| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1  | Dublin 1              |
| D01 V902             | D01 V902              |





CLLR. ALAN HAYES  
Peace Commissioner  
SDCC, County Hall, Tallaght, Dublin 24



8<sup>th</sup> January 2023

The Secretary  
An Bord Pleanála  
Strategic Infrastructure Division  
64 Marlborough Street  
Dublin 1 D01 V902

**Lucan to City Centre Core Bus Corridor Scheme - BusConnects**

Dear Sir / Madam,

I make these comments as an Elected Councillor and resident of Palmerstown village following two public meetings I organised attended by 250 individuals. I ask the Bord to consider the lived reality of all current and future residents who live in this heritage village.

Also important to consider is the cumulative impact of current and proposed building developments in the community:

- Indian Orthodox Church (SD17A/0466).
- Approved planning application for a 55-bed hotel (SD19A/0218) at the entrance to the village.
- Cherry Orchard Industrial Estate pre-planning meeting LRDOP005/22 for 133 apartments on the side of Kennelsfort Road.
- Approved planning application for 55 apartments at Silver Granite Kennelsfort Road (SD21A/0271)
- Part 8 development currently under review to increase the density for older persons housing at the Old Lucan Road.

I have grouped my observations according to the proposed changes around specific junctions and roads.

I offer one overall comment that the proposal to run the new bus route number 80 through the Old Lucan Road has not been requested by residents or businesses in Palmerstown and is responsible for much of the planned works the Oval junction, a significant element of the scheme that is avoidable.

**INDEPENDENT COUNTY COUNCILLOR**

**PALMERSTOWN - NORTH CLONDALKIN - LUCAN**

## **Changes proposed at the Oval junction in Palmerstown**

### **1. Removal of left filter entering the Oval from R148**

The road will be four lanes wide at this point. Two main lanes and a bus lane on the left and right to enter the village. The removal of left filter will mean residents sit in the main traffic lane waiting for the busses to move before turning left. This delays westbound traffic and is unnecessary. Cyclists will continue to use this lane as it is the most direct route westbound, forcing cars to turn left across the bus lane will likely result in danger for cyclists. The existing situation of a short-left filter does not impede bus movement, allows cyclists to take a safe position on the right hand side of left turning vehicles and should be maintained.

A left entrance into the Oval must be maintained in order to prevent vehicles needing to use Kennelsfort road to access homes, schools, childcare, sport clubs.

### **2. Bus stop parallel to Palmerstown Drive removed**

The network of laneways that run through Palmerstown make this the closest bus stop to hundreds of homes between Palmerstown Drive, Culmore Road and Park, Glenaulin Road. The removal of the stop is unnecessary and counter to the objective of having a bus stop within circa 400m where people live.

It will also mean that the first stop for the bus route 80 will be Palmerstown Village forcing commuters continuing west to cross back over the R148 to connect with a C bus.

### **3. U-turn in centre island removed**

This is to facilitate the new 80 bus to enter the village. It will also result in forcing more vehicles to enter Palmerstown Village if they need to change direction from westbound to eastbound. Forcing more vehicles to enter the village increases vulnerability of pedestrians and cyclists in the village area.

### **4. Bus number 80 (replacing 26) will enter and exit Palmerstown Village at Shaws Tree Services**

Established in 1925, Shaws Tree services main services gate is in the path of the new 80 entrance between Old Lucan Road and R148 on the west side of Applegreen garage. The bus will enter and exit just 2 metres from the vehicle entrance. This is not safe and can be avoided by excluding the 80 from entering the village at this location. Any delays in vehicles entering or exiting the business will result in the bus access being blocked and have a knock-on effect on eastbound traffic of the R148,

**COUNCILLOR ALAN HAYES  
INDEPENDENT  
PEACE COMMISSIONER**

particularly the bus lane.

I do not see any details provided about how a bus will be able to turn left on to the old Lucan road from Shaws without crossing into the oncoming lane of traffic.

**5. Bus stop at Applegreen garage moved to the west of the main junction**

The removal of any green space from the rear of St.Fintans Terrace, Redcow Cottages and Woodfarm Cottages will have negative consequences for residents as the area is a soakaway that contains a wide ditch holding water. Any changes here will have a knock-on effect on residents.

**6. Pedestrian crossing moved from East to West side of junction**

The landing space on the southside of the junction is very small between the newest homes at Palmerstown Avenue/Oval and the R148. The removal of vegetation from the southern embankment which acts as a noise and pollution buffer for these residents is concerning and a further breach of commitments given when the R148 (old N4) was constructed to install a noise barrier between homes and the road.

Conditions should be included to this effect by An Bord Pleanála.

**7. Green embankment on northside of R148 used for plant storage during construction (approx. 2 years)**

An adequate assessment of wildlife in this area has not been included. It is acknowledged in the environmental impact assessment that the area is a feeding ground for bats but this is the extent of the EIA and no mention is made of Badgers known to be in the area.

A condition should be included to reinstate the area with mature trees, no smaller than those already present and working times should be limited due to the proximity of residents. A full and proper EIA should be undertaken here and any protected species should result in a refusal to allow the area to be used.

**COUNCILLOR ALAN HAYES  
INDEPENDENT  
PEACE COMMISSIONER**

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## Changes at Kennelsfort Rd / R148 Junction

### 1. New pedestrian crossing underneath the Footbridge

I disagree with the NTAs position on this as a desire line that should be facilitated. The footbridge is safe at this major junction and at least twice in the past two years the lights have been struck by vehicles. If this is pedestrianised it will increase the likelihood of pedestrian injury or death. There is already a signalised pedestrian crossing at the Oval. Including a pedestrian crossing will increase red light time for busses on the C-spine.

### 2. No left turn eastbound from Kennelsfort road lower

If the pedestrian crossing is removed and a priority cycle light provided, it is unnecessary to eliminate the left turn out of the village. Reducing the eastbound exits from two to one is forcing all vehicular traffic to the quietest part of the village where they will compete with a proposed contraflow bus lane and dual cycle way.

### 3. New staggered pedestrian crossing outside Palmers Gate Apartments Kennelsfort Road Lower

While the road width is not the standard 19 metres to require a refuge island, it acknowledges the dangers for pedestrians crossing at this point. The provision of an island may also help with preventing illegal right turns egressing from the apartments. It should be noted that there is a High Court action underway regarding the use of the vehicle egress from the apartments to Old Lucan Road.

An Bord Pleanála in 2018 (ABP-302521-18) refused permission for the apartments due to a right of way in the adjacent business park. This may still result in refuse trucks needing to enter and exit from the Kennelsfort road lower.

Chapter 4 of the Proposed Scheme Description, P32 is presented on the premise of an entry only from Kennelsfort Road lower to the Strategic Housing Development. The Inspector should note the discrepancies here.

I would ask the inspector to take this into consideration the following points taken from An Bord Pleanála's refusal report in 2018 and should form part of the considerations for this planning application as the negative impacts remain the same

- *"the provision of a single vehicular access/egress point at the junction of Kennelsfort Road and the R-148, would endanger public safety by reason of increased traffic movements and would lead to conflict between road users, that is, vehicular traffic, pedestrians and cyclists"*

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INDEPENDENT  
PEACE COMMISSIONER**

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This has not changed, and the main access/egress point is still 13 metres from one of the most congested junctions in the County. The approved application in 2020 states that 60% of vehicular traffic will use the Kennelsfort Road exit and 40% would use the Old Lucan Road exit. Now it is proposed that 100% of motor traffic use Kennelsfort road exit.

4. Bus 80 (replacing 26) enter village & turn right towards Oval junction

Since non statutory consultations began in 2017, I have not spoken to anyone who requested this bus to enter the village and exit at the Oval. It is likely being done because of the removal of the 18 route. It is unnecessary. The bus will stop further away and prevent hop-on hop-off possibility for route 80 users who want to connect with the c-spine.

Traffic light priority is given to the traffic on the R148. At peak times, traffic exiting the village on Kennelsfort road lower can be backed up to the Old Lucan road and only allow between 4 to 6 cars to exit before turning orange. It is normal for exiting traffic to be backed up to Waterstown avenue on the Old Lucan road. In the absence of a grade separated junction on the R148, as per the Specific Local Objective in the County Development Plan, this problem will be compounded.

A condition should be included by the Inspector to maintain the route 80 on the R148 and not to enter the village area.

5. No filter left westbound from Kennelsfort Road Upper to M50.

Kennelsfort road at this location is the most congested road in Palmerstown. A left filter currently exists and enables a significant amount of vehicles to exit Kennelsfort road while North and Eastbound cars wait for the full green light.

A condition should be included by the inspector to maintain a filter left light to enable residents of Kennelsfort road to move freely, limit idling time and improve air quality.

6. Single westbound carriageway from Kennelsfort Junction to M50

Reducing to a single lane for traffic over the M50 to the N4 is one of the decisions I do not understand at all. Two lane carriageway from Heuston station to Palmerstown and then 4 lane from M50 westbound. Palmerstown will be a worse bottleneck than at present and the air quality will further deteriorate with priority being given to traffic merging from the M50 it will be a virtual carpark.

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INDEPENDENT  
PEACE COMMISSIONER**

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This will further penalise local residents with the removal of filter left lights onto the R148 they will be unable to access the road causing further tailbacks around the schools a the Oval and on Kennelsfort road.

The Inspector should include a condition that NTA progress the County objective of a grade separated junction and that the existing road layout between Kennelsfort road and M50 be maintained as it works and does not need to be changed for the worse.

**COUNCILLOR ALAN HAYES**  
**INDEPENDENT**  
**PEACE COMMISSIONER**

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## **Changes at Old Lucan Road**

### **1. Two-lane cycleway from M50 wall to behind Applegreen at Oval junction**

This ticks several boxes for NTA and Council. Alternatives were suggested to the NTA during the non-statutory consultations such as running the cycle lane completely off-road from the M50 wall to the R148 grass embankment behind houses at Hollyville and also the use the link between R148 & Old Lucan road to the side of House number 9 Hollyville which was a public access point.

It results in the loss of all on-street parking on the north side of the Old Lucan Road. The impact assessment indicates off-road parking is available in the vicinity, these are private car parks near St,Philomena's RC Church at Aldi and Mr. Price retail store and the Palmerstown House carpark at the junction of the Old Lucan road and Kennelsfort Road lower. Residents and Church users do not have the right to park at these locations. Coupled with the loss of informal parking spaces on the Old Lucan road, the impact will be significant.

There are no recorded incidents involving cyclists on the Old Lucan Road that I can find any information on. Council and Gardai have no records of incidents which raises the question about the need for the double cycle lane the whole length of the road. In large sections the footpath is wide enough to accommodate a shared footpath and cycle way such as exits over the M50. The cycle way stops again at the hill down into Chapelizod, a far more dangerous location for cyclists due to the speed of vehicles coming from the R148 in comparison to the Old Lucan Road. Given that it simply stops at this dangerous location, I am not convinced by the need to install it the full length of the OLR.

It is the lived reality and perception of all residents I have spoken to that Old Lucan Road does not require a dedicated double cycle lane on the road and it appears from the summary drawings that the cycle lane is simply being painted on to the roadside to reduce the width of the road and not to provide safe infrastructure for cyclists, many of whom already stay on the R148 & N4 because it is a more direct and faster route to and from the city centre.

### **2. New Bus stops outside Millbrook Apts & no. 1-3 Woodfarm Cottages**

This bus route 80 is not required in the village area. It increases transition times for passengers connecting between 26 and C busses.

Palmerstown Village is a Heritage of South Dublin County and Woodfarm Cottages

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INDEPENDENT  
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and Redcow Cottages in Palmerstown Village are Areas of Architectural Conservation under the existing South Dublin County Development Plan. To install a bus shelter directly outside these cottages, blocking their view and reducing the already small footpath is architectural sabotage.

The removal of informal parking spaces on the Old Lucan Road, described in Section 4.5.2.1 of the Chapter 4 General Scheme Description, the exact location of these parking losses is not clear in the written statement or the scheme drawings.

Perpendicular Parking at Redcow Cottages will cause problems for vehicles reversing into a road where a bus is proposed to operate. It will also cause problems for HGVs from Mill Lane where there is a Steelworks and there is insufficient space for these trucks to clear the corner when exiting on to the Old Lucan road without either driving in the proposed cycle lane or hitting cars parked at Redcow Cottages. This is a point that has been clearly missed through the desktop exercise to develop this plan.

The fee of €50 has been paid and if further clarity is required on any points within, please do not hesitate to contact me.

Sincerely  
Councillor Alan Hayes  
38 Riversdale Avenue  
Palmerstown  
Dublin 20

**COUNCILLOR ALAN HAYES**  
**INDEPENDENT**  
**PEACE COMMISSIONER**

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