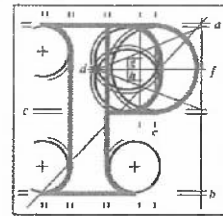


Our Case Number: ABP-314942-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Gareth Kelly
74 Palmerstown Drive,
Palmerstown
Dublin 20
D20 HX98

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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SUBMISSION IN RESPECT OF
THE LUCAN TO CITY CENTRE BUS CORRIDOR

SUBMITTED BY:

Gareth Kelly of 74 Palmerstown Drive, Palmerstown, Dublin 20 (D20HX98)

While I welcome the overall intent of the proposed development I contend that the detail of the proposals in and around Palmerstown are more detrimental than beneficial and do not take into account the lived reality of commuters and residents of the area.

I wish to make the following observations in respect of the proposed development:

1. The proposal to route the replacement for the No 26 bus into the eastern side of old Palmerstown village is both unwanted (by the local community) and damaging. There is no substantive data provided in the submission to justify or support this proposed new bus route. The rerouting creates negligible, if any benefit, in comparison to the wide range of detrimental impacts it introduces which will reduce safety within the village and the adjacent junctions with the R148.

The rerouting of the bus route into the eastern side of the village necessitates a number of associated works required to facilitate this all of which have a very significant detrimental impact in the area, including:

- i) **The proposed relocation of the pedestrian crossing from the Oval across the R148 to the Applegreen SS.**

This relocation of the pedestrian crossing creates a very significant impediment to the traffic flowing out of the Oval in a westbound direction. The proposed development removes the current filter arrow facilitating the exit of traffic from the Oval westbound onto the R148 which currently contributes significantly to the clearing of traffic from the Oval. It is noteworthy that the immediate vicinity of the Oval includes 2 National Schools (St Lorcans & St Brigids), 2 Crèches (The Oval & Hi-5) as well as the Manor Rd. shops (Credit Union, Butcher, 2 coffee shops, Newsagent etc.) all of which generate road traffic in the area much of which exits onto the R148.

There is no substantive data provided to justify the proposals nor are there substantive data on the traffic impacts associated with the proposals or a . While I do not have detailed data on the traffic impacts as a regular observer of the junction on a daily basis I am of the clear opinion that this will have a very significant detrimental impact on clearing traffic from the Oval junction and also reduce the safety of pedestrians traversing the roads at this junction.

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ii) The proposed road alterations required to facilitate the turning in of the new bus route to enter old Palmerstown village at the Applegreen from the R148.

These include the provision of a new turn in lane in the middle of the R148 as well as an additional lane entering the village at this junction. The proposed development will result in an increase in the complexity of this junction from both a vehicular and pedestrian perspective and reduce the safety of both pedestrians and motorists. The increased complexity of the junction arises from the widening of the junction to add an additional lane to facilitate the proposed bus route, which then necessitates a staggered pedestrian junction as well as introducing two way traffic from the current one way traffic. Currently there is less need for pedestrians to traverse the junction due to the current location of the bus stop but this changes significantly under the new proposals. As such the measures significantly reduce safety and will in particular impact on the safety of elderly pedestrians due to the increased complexity and increased travel distances the proposals introduce.

There are no substantive studies, data or assessments provided to properly assess the safety implications of the proposals. The lived reality of the proposals are asserted to be very detrimental to the local community and should not be permitted to proceed as proposed.

While I contend that the current rerouting of the 26/80 bus route into the eastern side of old Palmerstown village should be avoided as it would be very detrimental (as outlined above) there may be alternatives that reduce at least some of the negative impacts identified. It is not clear if all the alternative options have been considered as regard buses travelling out from Dublin.

The old Lucan road (R112), which connects Chapelizod with Palmerstown and onwards to Lucan was previously changed from a two way road and footpath, to a one way direction road and footpath. It is currently proposed that a two way cycle route be placed on this road, and no changes to the direction travel for cars and buses. It may be that the use of a contra flow bus lane should be considered here. It would be approx. 100meters in length and could be placed alongside two way cycle track by fully utilizing the full width of the available road space. Such a contra flow bus could allow the new bus route (26/80) and indeed any other buses travelling from Chapelizod to enter old Palmerstown village without having to access the R148. This would remove the need for a right turn for westbound buses at the junction of the R148 and the Oval and relocation of the existing pedestrian crossing all of which reduce the safety at this junction.

Furthermore there is a clear if not unanimous preference in the community which I support to maintain the 26 or proposed 80 bus out of the eastern side of old Palmerstown village (i.e passing Woodfarm Cottages). The bus route should be maintained on the R148 where it connects with the C spine and thus provides

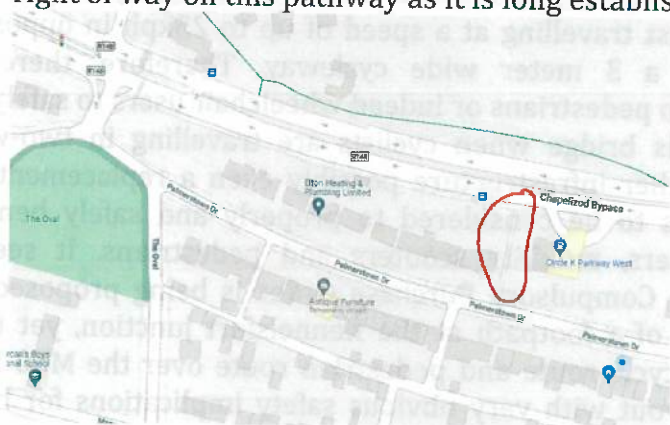
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far better connectivity with other existing bus routes. By maintaining an overlap with the C Spine route on the R138 the service better connects both the northern and southern areas of old Palmerstown. An overlap also provides a wider choice of buses to commuters where in many cases busses arriving in Palmerstown are already full. The avoidance of routing buses through the eastern side of old Palmerstown village would drastically reduce the (detrimental) works proposed to support this rerouting into the village. Maintaining a section of the proposed 26/80 bus route on the R148 with shared C spine bus stops is also preferable as it provides an easily accessible set of bus stops from both the north side and south side of the R148. Rerouting the bus into the village as proposed will actually increase pedestrian travel distances for many local residents especially those in south eastern Palmerstown.

It is also noted that the proposed new bus route will have a bus stop outside Woodfarm cottages which are in a protected conservation area which should prevent such a negative development, especially if the stop is to have a bus shelter provided.

2. The removal of the bus stop at Palmerstown drive (westbound R148) increases travel distances to a large area of south-eastern Palmerstown including Palmerstown Drive, Culmore Rd., Glenaulin Rd. and their surrounds. This proposal is contrary to the objective of having a travel distance of no more than 400m to a bus stop. In addition the deletion reduces safety as it necessitates traversing larger, more complex and busier traffic junctions in particular at the Oval. This is a significant safety issue which impacts all commuters in these areas but particularly the more elderly residents of the area.

The existing location of the bus stop provides a very safe walking route through a residential area and is free from interruption from heavy traffic or complex junctions. It is a very safe walking route especially for both young and elderly residents in the area. Pedestrians travel along a pedestrian pathway through the Circle K petrol station (see picture below) which is exclusively for the pedestrian use. I understand that pedestrians have a legal right of way on this pathway as it is long established bus stop in the area.



The removal of this bus stop effectively stop pedestrians using this right of way, force bus users to alight at a much busier junction, further away from

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their homes and then travel across a much busier junction with overall greater travel times to their homes in south-east Palmerstown.

3. The development includes a proposal to remove the filter arrow facilitating traffic on Kennelsfort Rd. to turn left (westbound) onto the R148. The Kennelsfort road suffers severe congestion currently and is backed up several hundred meters for large parts of the day. The removal of the filter arrow will increase this congestion. There is no proper data or analysis provided in the application to demonstrate how the proposed changes will impact on existing traffic flows at this junction and the routes feeding into and exiting this junction. This is another case where the lived reality is being ignored without gathering proper data and analyzing this to determine the impacts the proposals will create.
4. Travelling west on the R148, after passing through the junction known as Kennelsfort road. It is proposed to reduce the road available to cars from two, down to one lane and increase the number of bus lanes to two. One for the M50 and one to cross the M50 bridge. This will create a very significant build up of cars as already the volume of cars is huge. This will increase the likelihood of a road traffic collision. Vehicular traffic exiting at Kennelsfort road, (which has the filter lane removed) wishing to travel towards Lucan will have to cross to the right most lane in order to travel west. Vehicles will inevitably use the bus lanes to switch lanes, access the M50 and to exit the city via R148 and M4.

There is no substantive data provided in the application that properly assesses the traffic impacts of this proposed change and it is very apparent to local residents like myself that the proposed change will negatively impact on the free flow of traffic resulting in poorer air quality, noise and wider congestion in the local area.

5. The existing pedestrian and cycle bridge across the M50, shown on sheet 11 (see below) is simply not wide enough for a two way cycle lane and a two way walkway proposed. Considering the distance recommend leaving a cyclist by a car in zones up to 50km is one meter (www.rsa.ie) this would seem to mean two cyclist travelling at a speed of up to 25kph in opposite direction would need a 3 meter wide cycleway. Therefore, there is insufficient room for two pedestrians or indeed wheelchair users to safely to pass each other on this bridge when cyclists are travelling in two-way directions. As such further infrastructure possibly even a replacement or additional bridge needs to be considered to properly and safely benefit cyclists, wheelchair users, mobility scooters and pedestrians. It seems disproportionate that a Compulsory Purchase Order is being proposed to straighten a few yards of a footpath at the Kennelsfort junction, yet it is proposed to leave the cycle route and pedestrian route over the M50 in a very poor zigzagging layout with very obvious safety implications for both pedestrians, cyclists and wheelchair/mobility scooter users.

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Conclusion

To conclude, the proposals lack sufficient local data and it's subsequent assessment to properly determine the potential impacts on the area around Palmerstown. The experience of living in and commuting into and out of Palmerstown leads me to conclude that the proposed development will very significantly reduce safety at a number of junctions for pedestrians but also motorists without providing sufficient benefits and must be revised accordingly. It is particularly asserted that a very significant number of detrimental impacts introduced by the development can be avoided if the proposed 26/80 bus route does not enter the eastern section of old Palmerstown village.

