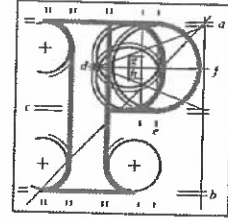


Our Case Number: ABP-314942-22



An
Bord
Pleanála

D. Kennedy Stell Supplies Ltd.
Old Lucan Road
Palmerstown Village
D20 YD78

Date: 8th February 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 mean time, 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

| | | |
|--------------------|---------|------------------|
| Tell | Tel | (01) 858 8100 |
| Glaó Áitiúil | LoCall | 1800 275 175 |
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| Láithreán Gréasáin | Website | www.pleanala.ie |
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
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64 Marlborough Street
Dublin 1
D01 V902

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Our Ref.

10 JAN 2023

09/01/2023

06/040-23
Aug - 316942-22

Ref. Proposals relating the village of Palmerstown as affected by Route 06 – Lucan to Dublin route referred to in Bus Connect / NTA documents and Report on Stage 2 of the Lucan to City Centre Parking Survey Report as it relates to the Old Lucan Road area of Palmerstown Village, Dublin 20.

Dear Sir or Madam,

I wish to make the following additional comments in connection with the most recent proposals published relating to the Bus Connects Scheme and specifically relating to the proposals affecting the village of Palmerstown, Dublin 20.

I have previously stated in my submission dated 15/12/2020 that, I am acting on behalf of myself Daniel Kennedy, my father Dan Kennedy, my mother June Kennedy, my brother Darren Kennedy, and our respective families all of whom are long-time residents within the village area of Palmerstown. I am also representing D. Kennedy Steel Supplies Ltd.

I have also previously stated that I am also acting on behalf of myself Daniel Kennedy, my father Dan Kennedy and my brother Darren Kennedy all of whom are directors of our family business D. Kennedy Steel Supplies Ltd. which was established within the village area of Palmerstown in 1985 and has continued to trade from within the village since then. Our presence within the village over that very extensive time period is confirmed by reference to the commercial rates that we continue to pay and various planning applications that relate to our premises over many years.

We are located and operate our long established business (est 1983) from the commercial "heart" of Palmerstown Village. Our business premise is located are in close proximity to the various commercial businesses located within Palmerstown Business Park, The Aldi Supermarket, Mr. Right Price wholesale etc.

Like ourselves all these businesses have ingress and exit points for customers, customers' vehicles and larger sized supply and deliver vehicles directly from and to the Old Lucan Road which is located along an east / west axis through Palmerstown Village.

Additionally, recent developments including 250 apartments being constructed by Randalswood Holdings in the immediate village area will increase the discharge of vehicles on to the Old Lucan Road at this general location in the village.

An integral part of Randalswood's Planning Permission is that vehicles from their site will exit on to the old Lucan Road through the Business Park lands due to the extremely restricted access to their site at the Kennelsfort Road junction beside the N4.

Therefore, when occupied the apartments will generate significantly additional traffic on to this section of the Old Lucan Road in the village of Palmerstown.

In our opinion the latest Bus Connects proposals takes no realistic account of these on the ground facts.

The latest proposals appear to show proposals for the creation of a dedicated 3m wide two-way cycle route along the northern side of the roadway (Old Lucan Road) through the village of Palmerstown.

Under Table 3-9 of the report under "Options Analysis" consideration is referred to a number of options that arise due to the significant loss of the "informal" parking along the northern side of the Old Lucan Road.

Item 1 refers to the option of "Providing additional informal parking as part of the scheme".

The "Analysis" says that there is "No scope to include additional informal parking without compromising the scheme proposals."

I would suggest that this is hardly a scientific analysis of the situation. The comment is far too general and says nothing about how any such options has been reviewed and therefore cannot be evaluated or commented upon.

The analysis goes on to say that " There is significant amount of informal parking retained on the southern side of the Old Lucan Road".

I note that it is not stated that there is sufficient informal parking retained to deal with the existing demand and indeed takes no account of immediate future developments that will likely impact on the extent and availability of informal parking on the Old Lucan Road. I refer to such above and below.

The "Analysis" determines the "Viability" as "N" assumed to mean No.

Item 2 refers to the option of "Revert to the present arrangement whereby the existing informal parking is retained."

The "Analysis" says that "The arrangement would result in a conflict between vehicles & cyclists".

Again no indication as to how this claimed fact has been determined.

The "Analysis" determines the "Viability" as "N" assumed to mean No.

Item 3 refers to the option of "Commercial premises customers currently using informal parking to use the respective car parks."

The "Analysis" says that "Customers of commercial premises can be directed to use the respective car parks."

The "Analysis" determines the "Viability" as "Y" assumed to mean Yes.

The "respective car parks" locations are not described but are assumed to refer to the car parking off roadway and within the respective commercial premises.

No analysis of the extent and capacity of such off street vehicle parking appears in this report and so cannot be commented upon. Some existing commercial premises have little or no off street parking in particular smaller street fronting premises that have been there for many years and for whom the absence of sufficient available on street car parking may be commercially significantly damaging.

Also, how customers can be "directed" is not stated. Will the NTA or such arrange for all related signage infrastructure required be sourced, erected and maintained?

Item 4 refers to the option of "Residents & visitors using informal parking on the northern side of the road to use the southern side."

The "Analysis" says that "Informal parking will be available on the southern side of the road, which from desktop observations, appear to be under utilized."

The "Analysis" determines the "Viability" as "Y" assumed to mean Yes.

There is no clarity on what "desktop observations" comprised of or what the claimed degree of under utilization means and therefore does not allow such claimed data to be commented upon.

Were any on site inspections carried out? Over what period? At what times? Any such information should be available to review by affected residents and commercial business owners and it is unfair that such an opportunity is not available.

We suspect that the "Viabilities" listed within the document and referred to above do not arise out of scientific analysis but on assumptions that are not soundly based and which will significantly negatively affect all locals well into the future.

In our opinion as we have a long established local knowledge of the parking and traffic problems associated with Palmerstown Village that the analysis is to put it kindly faulty and not soundly based. Essentially the viability outcomes

as stated were decided without fair analysis of the factual on the ground situation.

Nowhere in the analysis is it stated that there is sufficient informal parking retained to deal with the existing demand and indeed takes no account of immediate future developments that will likely impact on the extent and availability of informal parking on the Old Lucan Road.

I have referred to the substantial apartment development by Randalswood. As these are not yet completed or occupied the impact of associate demands for parking by such as visitors to such apartments or residents within that scheme that may be vehicle owners but without specific allocated car parking within the scheme etc. It is premature to assume that none of such visitors or residents will increase the demand for the to be reduced informal on street parking

Also, there is a substantial increase in commuters driving to urban centres within cycling distance of major centres of employment such as Dublin City etc. The centre of Palmerstown Village is one of such locations. Therefore much of the "informal" car parking spaces will likely be occupied by such "park and ride" commuters to the detriment to local residents and business owners.

During times of peak use of the Church such as during funerals etc. car parking availability on the Old Lucan Road is significantly reduced along the old Lucan Roadway which again negatively impacts on local residents and business owners.

I refer you to our original submission concerning Bus Connects in the overall context of its effect on Palmerstown Village and its environs dated 15/12/2022

I enclose a copy for your intention as it may have been originally forwarded to An bord Pleanala and I would ask that you review its content.

In the context of my submission today concerning the specific matter concerning the proposals to reduce on street car parking and the installation of two cycle ways on the northern side of the old Lucan Road I would like to restate that we operate a business which obtains the delivery to our premises of steel in substantially sized vehicles typically comprising of a cab and trailer typically 16.5 metres in length and trambone trailers up to 25 mtrs. We also own and use for deliveries 5 articulated trucks of similarly sized large vehicles and 3 rigid trucks.

The entrance to our premises is along the Old Lucan Road as shown on the map enclosed with our original submission. In order for vehicles to enter and leave our premises we require the full existing width of the carriageway to execute the necessary 90 degree turns involved.

We are concerned that the revised proposals do not state what the final minimum road carriageway width will be excluding car parking spaces widths, footpaths widths on both sides (will the existing footpath width and car

parking width on the southern side of the Old Lucan Road remain unaltered ?) and taking into account the construction and sizes of any protective structures for the proposed cycle lanes such as bollards, kerbing which have not been stated in the report. As they have not been stated there remains a significant degree of ambiguity on the eventual proposals and construction.

Therefore, we continue to be very concerned that the turning movements of vehicles entering or leaving our premises will be impaired / restricted by the reduced widths of the carriageway etc.

The impact of such is that our supplier's and our delivery vehicles may be forced to temporarily park on the roadway to seek to deliver or collect from our premises. Obviously, in the context of the heavy loads carried any such activity would not be workable from a safety perspective. Therefore it is absolutely essential that if our objections to the proposals as they stand are over ruled and the NTA / Bus Connects proposals as they stand are approved by An Bord Pleanala that we receive cast iron guarantees as to the workability of the new arrangements to allow continued safe access to and from our premises. In the event of such being prevented then, we may have to seek financial compensation for any disruption caused to our business activities.

For the above reasons we would ask that you review the proposals made within your latest published documents.

Yours faithfully,
Daniel Kennedy

D.Kennedy Steel Supplies Ltd
Old Lucan Road
Palmerstown Village
D20 YD78

This is our original letter of 15/12/2022

Address

10/07/2020

To Bus Connects

Ref. Proposals relating the village of Palmerstown as affected by Route 06 – Lucan to Dublin route referred to in Bus Connect s documents.

Dear Sir or Madam,

I am acting on behalf of myself Daniel Kennedy, my father Dan Kennedy, my mother June Kennedy, my brother Darren Kennedy, and our respective families all of whom are long-time residents within the village area of Palmerstown.

I am also acting on behalf of myself Daniel Kennedy, my father Dan Kennedy and my brother Darren Kennedy all of whom are directors of our family business D. Kennedy Steel Supplies Ltd. which was established within the village area of Palmerstown in 1985 and has continued to trade from within the village since then. Our presence within the village over that very extensive time period is confirmed by reference to the commercial rates that we continue to pay and various planning applications that relate to our premises over many years.

The Palmerstown area, which effectively extends eastwards from the M50 as far as the City boundary at Chapelizod, is identified as a "consolidation area" in the SDCC Development Plan, 2016-2022. It is planned that in these areas an intensified new pattern of development should be encouraged, in order to limit urban sprawl.

The original village is zoned 'Objective 'VC', which seeks: *"To protect, improve and provide for the future development of Village Centres."* The Development Plan states that: *"the Village Centre zoning will support the protection and conservation of the special character of the traditional villages and provide for enhanced retail and retail services, tourism, residential, commercial, cultural and other uses that are appropriate to the village context."*

Our family business is trading as D Kennedy Steel Supplies and is involved in the fabrication and sale of steel products used extensively within the construction industry. D Kennedy Steel Supplies is a substantial family-owned company which has operated a light engineering business from the premises at Palmerstown and currently employs twenty-five people. The company

supplies steel to the construction and agricultural industry, which entails handling of large quantities of steel on site, including long beam and column sections (channels, angles and I sections), steel bars, sheet metal and steel mesh. At our premises, operations include sawing, guillotining, welding, drilling, folding and fabrication of steel to order.



Steel being moved by forklift on our premises

These operations all accord with Development Plan policy. During the years since its establishment, D Kennedy Steel Supplies has expanded, including additional buildings on foot of various planning permissions.

Palmerstown is a small, particular area, with a more "*traditional*" development pattern. It was severed from its hinterland by the construction of the Palmerstown (Chapelizod) Bypass in the 1970s . The village is now a relatively confined area north-east of the Palmerstown Bypass and aligned along the old Dublin-Lucan road, itself now bypassed and terminating in a cul-de-sac near the M50. The centre of Palmerstown retains the scale and appearance of a village, particularly in the vicinity of Kennelsfort Road and its junction with the old main Lucan-Dublin road.

We are located within an area in the village where existing neighbouring sites are in a variety of commercial uses including The Mr. Price Super Store, The Aldi Supermarket, the mixed use Palmerstown Business Park Industrial Units, local churches etc.

As both residents and business owners within the village of Palmerstown we are very familiar with the many issues that relate to it including the potential impacts of changes to transport infrastructure relating to bus routes and cycle ways / tracks.

We have noted the latest current proposals as set out within your document titled as "Bus Connects –Route 06 – Lucan to City Centre – Preferred Route Options" specifically as they will affect the day to day activities within Palmerstown and its occupants including residents and business owners and their customers.

We are acutely aware of the difficulties that traffic congestion at the junction with the N4 / R148 (the main junction and access route to the village at the end of Kennelsfort Road Lower) causes both personally to us as residents and the delays that such impacts on the efficient running of our company by delays caused to company owned vehicles and those of our customers and suppliers exiting the Village. Palmerstown village is already particularly difficult to exit at peak traffic times and in our opinions your proposals will also increase that difficulty.

Access to and from the village is already difficult for commercial vehicles with the three ton limit on commercial vehicles travelling on Kennelsfort Road Upper. Our commercial vehicles therefore must travel in an east or west direction when the signaling at the junction permits and therefore the proposals when they lead to increased traffic flow at a critical and substandard junction will likely increase traffic delays and the likely negative impact putting at risk our ability to meet delivery times etc. This could have a significant negative impact on our family business in addition to the personal impact that traffic congestion will have on our family and generally to other residents within the village area.

Palmerstown village is effectively land locked with only one traffic junction for traffic entering the village and two for traffic entering and exiting it.

The infrastructural deficiency at the main junction at Kennelsfort Road Lower with the Palmerstown Bye Pass (R148) is recognized within the South Dublin County Council's Development Plan 2016 – 2022 where the upgrading of it is referred to within the "Six Year Road Programme". Despite this no such improvements have taken place as the Plan moves into the final two years of its term.

In the absence of any knowledge of the time frame for such aspirational improvements anything relating to changes to transport infrastructure such as the proposals under Bus Connects that make matters worse should not proceed.

Also, the impacts of two proposed building developments on the opposite sides of Kennelsfort Road Lower within yards of the sub-standard junction can only make matters worse from a transport perspective in the short term until the junction is upgraded by such as an overpass etc. The inclusion of such as "Tuacan" passing points are certainly insufficient to deal with the existing and future problems..

The recent decision to by An Bord Pleanala to grant permission to Randelswood Holdings Ltd for 250 apartments with access to their site directly adjacent to the junction will only make traffic related problems worse.

In submissions made associated with applications on that site we commissioned an expert Dr. Martin Rogers, Transport Planning Professional who reported in relation to traffic issues. Dr. Rogers identified deficiencies in the proposed access arrangements of sufficient magnitude to constitute a serious traffic hazard, arising out of the proposal to form an entrance and exit point a short distance from the junction of Kennelsfort Road and the Palmerstown (Chapelizod) Bypass (R148).



View of Kennelsfort Road access point from pedestrian bridge over dual carriageway Bypass

Similarly, the decision made by South Dublin County Council to grant permission for a hotel under SD19A/0218 with access to the site again directly adjacent to the junction but on the eastern side of Kennelsfort Road will only make traffic related problems worse.

It should be noted that in Dr. Roger's submission relating to the SHD on the west of Kennelsfort Road Lower he drew attention to the proposed 53 bedroom hotel development (SD19A/0128 – subject of decision to grant permission 19th June 2020) immediately opposite the SHD site on the eastern side on Kennelsfort Road Lower, which he said "will further compound this concern".

I am today advised that An Bord Pleanala has confirmed the granting of planning permission for the hotel development. In their order the Board has seen fit to remove a condition contained within the Decision of South Dublin

County Council that service vehicles such as refuse trucks etc. should access the grounds of the hotel to service it. In the absence now of any such condition such service vehicles will pull up outside of the hotel entrance on the public roadway of Kellsfort Road Lower within yards of the junction with the obvious negative impacts on traffic flow at this critical location.

It should be noted that the hotel application includes a proposal for the creation of a dedicated right turn lane in the middle of the existing roadway for access into the hotel. The Bus Connects published maps do not reflect this. Bus Connects cannot disregard the impact of these critically located proposed developments and due regard of their impact must be taken.

Dr. Rogers also commented that car-parking provision for the SHD apartment development was substantially inadequate and will result in significant on-street parking by residents within the Old Lucan Road area. The Bus Connects proposals indicate the significant removal of on street car parking in the village which will make matters even worse.

I think it informative that so many local parties saw fit to object to the above developments largely on traffic grounds which indicates that there are genuine causes for concerns relating to the traffic infrastructure servicing the village.

In the context of the above we wish to formally object to the latest proposals within the Bus Connects documents as they relate to three particular areas of concern:

- 1) The proposals relating to the construction of a cycle track along the Old Lucan Road through the village.
- 2) The proposal to allow a dedicated bus right turning lane off the Chapelizod Bye Pass (R148) at the Oval Junction for the No. 80 bus route.
- 3) The virtual removal of on street car parking which will directly impact on inhabitants who do not have off street parking available within the curtilages of their properties.

Concerning (1), as stated above we operate a business which obtains the delivery to our premises of steel in substantially sized vehicles typically comprising of a cab and trailer typically 16.5 up to 25 meters in length.

We also own and use for deliveries a number of similarly sized large vehicles.

The entrance to our premises is along the Old Lucan Road as shown on the enclosed map. In order for vehicles to enter and leave our premises we require the full existing width of the carriageway to execute the necessary 90 degree turns involved.

Outside our premises the roadway consists of a near side pedestrian footpath of approx. 2920mm wide, a road carriageway 7920mm wide and on the far (

north) side another footpath 4820mm wide. Your drawings indicate a required minimum width of space of 3500mm required to accommodate the construction of a cycle track to operate in both directions. If the carriageway width is reduced by such then, we will not likely have sufficient turning space to execute the inward and outward movements that we, our suppliers and our customers currently undertake many times daily when entering and / or leaving our premises.

In the event that we are affected by the restrictions imposed by the proposed cycle track to that degree then, we may have to seek financial compensation for the negative impact that such restrictions will impose on us if adopted resulting from the Bus Connects process.

Concerning (2), Palmerstown Village has two junctions only with the R148. These are the only routes that road vehicles can take when leaving the village.

Currently at the main junction on Kennelsfort Road unless we are delivering to a local address we are restricted from accessing Kennelsfort Road Upper due to weight restrictions.

We can use that junction to exit the village in an easterly or westerly direction.

The drawings contained within your proposals concerning that junction appear to show no arrow in an easterly direction for traffic leaving the village. If that restriction was to be imposed (and such would not be reasonable) then, the only route out of the village to access the east bound lane of the R148 would be at the Oval Junction further to the east of the village. The size of our vehicles would not facilitate this as a means of us accessing the R148 in an easterly direction. Any such restriction would significantly increase the amount of east bound traffic exiting the village at the Oval junction. Therefore the impact of your current proposals relating to the Oval Junction must be considered.

Currently traffic exiting the village by travelling along the eastern side of the village on the Old Lucan Road turns a sharp bend at the petrol filling station and then splits into two lanes.

The left hand lane caters for traffic turning east. The right lane caters for traffic travelling across the junction into the residential estates and also traffic turning west. If as a result of your proposals to allow buses coming from the city centre to cross the main road to access the village at this junction then, one of the two lanes currently available to exiting traffic will be removed.

Therefore, all traffic exiting the village will feed into one lane and stop at the lights. This will result in an inevitable build up of traffic. Also, traffic prevented from say turning left or right during peak rush hour times if there is a build up of traffic on the R148 will result in such traffic not being able to enter the junction and delay traffic backed up behind that could have passed through the junction in the opposite direction under the existing two lane arrangement.

At the Oval junction larger vehicles such as ours do not have sufficient turning space to facilitate access on to the R148 to move in an easterly direction.

This significant reduction in the existing capacity to cater for vehicles exiting the village is seemingly being done to facilitate one bus route entering the village at this point. Essentially prioritizing the entry of the bus route at this point significantly reduces the capacity of one of the only two junctions from the village. In the context of the infrequency of the bus timetable outside of rush hours the result of significantly reducing the capacity at the junction to other road users is an excessive and unreasonable price to have to pay.

The knock on effect of reducing capacity at the Oval junction is that there will be increased pressure on the main junction at Kennelsfort Road Lower where as has been described above is in itself a bottleneck.

In addition to our concerns expressed above, we are also sympathetic to the objections to the proposed removal of on street car parking in the village particularly outside of houses that do not enjoy any off street cart parking spaces currently. It appears unreasonable that occupants of such properties should be deprived of parking spaces for themselves and their visitors. Palmerstown is an aging community and many residents are of advanced years and those with health issues need reasonable proximity to their vehicles. It seems unreasonable that such can be removed from them at a stroke. Therefore, we support the submissions made by the representative group of local concerned inhabitants of the village.

For the above reasons we would ask that you review the proposals made within your latest published documents.

Yours faithfully,
Daniel Kennedy