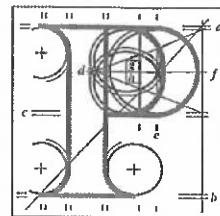


Our Case Number: ABP-314942-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Frank Lambe
2 Culmore Road
Palmerstown
Dublin 20

Date: 10th 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 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

HA02

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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902

2 Culmore Road
Palmerstown
Dublin 20
D20HY02

10th January 2023

An Bord Pleanála
Strategic Infrastructure Division
64 Marlborough Street,
Dublin 1

Re: **Lucan to City Centre Core Bus Corridor Scheme**
(ABP Case No: HA29N.314942)

Dear Sir / Madam

I wish to make an observation in relation to the above mentioned proposal and have included the required fee. Although the observation is in my name, it reflects the views of many of my neighbours and members of the Palmerstown community, gathered during several community meetings.

In the first instance, I request that An Bord Pleanála consider **rejecting the application** for the Lucan to City Centre Core Bus Corridor Scheme or at least seeking significant clarification from the applicant, for the following reasons:

- (i) Environmental Impact Assessment. The applicant claims to have comprehensively and properly assessed the impacts of the proposal on the receiving environment and on its population. I disagree. There are several examples throughout the EIA Report and in other documentation where it seems very clear that the applicant's assessment of the impact of the proposal on the local population is inadequate and indeed completely incorrect.

To illustrate this point, in Chapter 10, Population of the EIA, the applicant includes within the study area of the scheme, a reference to Halston Street.

Halston Street is in Dublin 7, several kilometres outside the actual study area. It is somewhat remarkable that this street would be identified by the applicant as being relevant to this application. Halston Street is a relatively small, city-centre street with only a handful of residents and very little commercial or other activity. It has no bus routes of any kind and is completely unaffected by the Lucan to City Centre Core Bus Corridor Scheme. It is difficult to understand how / why the applicant chose to include Halston Street as part of the EIA for the Lucan to City Centre Core Bus Corridor Scheme.

Throughout Chapter 10 of the EIA, the applicant continues to make reference to Halston Street and lists schools, places of worship and recreational facilities in the Halston Street area, in supposedly assessing the actual study area for the Lucan to City Centre Core Bus

Corridor Scheme and appears to use Halston Street as part of its justification for proposing the Lucan to City Centre Core Bus Corridor Scheme.

It is extremely concerning that the applicant seems to have made a fundamental error by including Halston Street as part of its Environmental Assessment of the Lucan to City Centre Core Bus Corridor Scheme. It would appear that this fundamental flaw, along with others within the EIAR, throws into question the entire basis on which the applicant has assessed the scheme. Such flaws are so significant as to cast sufficient doubt on the veracity of many of the other contentions within the proposal and the proposal should therefore be rejected.

- (ii) New Proposals. Although much emphasis is placed by the applicant on the non-statutory consultation that took place in developing the proposals, there are very significant new proposals contained within the application which were introduced by the applicant at a very late stage and did not undergo a proper consultation process.

For example, the creation of a completely new entry into Palmerstown Village at its eastern end, off the N4 (R148), for bus only traffic, indeed for 1 specific bus route. It has been confirmed by South Dublin County Councillors that this element of the proposal, together with the details of several other elements, was not presented to them before the application was submitted to An Bord Pleanála and that this element of the application was never discussed or subject to local assessment or proper public consultation.

Furthermore, there is no clear evidence that such an intervention, i.e. the creation of a new entry into Palmerstown Village for 1 specific bus route, was sought by a majority of the local population and there is no proper justification for its inclusion.

If the Board is not minded to reject the application, the applicant should at the very least be requested to completely review its assessment of the impact of the proposal on the local population and resubmit Chapter 10 of the EIAR and related sections dealing with population / community impacts.

Oral Hearing Request

If ABP decide to proceed with its assessment of the proposal, it is requested that ABP hold an **Oral Hearing** to consider the application, because of the complexity of the application and the significant impact of the proposed development on the community of Palmerstown and on the wider receiving environment, including but not limited to the very significant impact on traffic and transportation inside the M50 cordon.

Observations:

I wish to make the following specific observations for consideration:

- **Public Safety**

The traffic changes at The Oval / N4 (R148) junction have not been properly considered in the context of public safety, including consideration of pedestrian desire lines. There is a historic link with the

Village of Chapelizod, particularly from that part of "Old Palmerstown" in the area around the Oval. Currently the population of Palmerstown cross the N4 (R148) at The Oval in a direct line at a pedestrian signal controlled junction. This works very well. It also provides direct access to a very important inbound bus stop / shelter and to the local Applegreen petrol station, which also serves as a local shop for groceries etc.

Under the applicant's proposal, this entire junction is being interfered with and the current direct crossing point will, for many people, become a 3 stage crossing manoeuvre. This has safety implications, is completely unnecessary and will seriously impact negatively on the population of Palmerstown, including older and vulnerable people. It also serves to weaken the existing connectivity between Palmerstown and Chapelizod.

- **School Safety**

The proposed traffic changes will create additional dangers to the local schoolchildren and families going to and from the 2 local schools. There is often a back-up of vehicular traffic and the proposals for the removal of the filter lane and other changes at The Oval will worsen this situation.

The applicant's proposals do not properly take account of South Dublin County Council's recent Active Travel Proposals for safety and other measures around the school. In fact, the applicant's proposals will impact negatively on the ability of the County Council and the local population to introduce local safety measures around the school.

- **Connectivity – The Community of Palmerstown**

Much of the community across Palmerstown is elderly, many have mobility and other difficulties and we have many vulnerable members in the community. The applicant's proposals significantly negatively impact on the ability of the older / more vulnerable population to move around the community, including by car.

- **Local Traffic Impacts and Lack of Detail**

- Palmerstown Village.

The impact of the traffic changes on Palmerstown Village have not been properly considered. In particular, there is a complete lack of detail at a granular level of how the scheme impacts on the community of Palmerstown and on connectivity for its population. In previous years, the imposition of the N4 (R148) split the Palmerstown community in half - north and south of the N4 (R148). This new proposal, will in effect, further split the community and serves to disconnect members of the community from the Village area, with its church, shopping facilities, leisure facilities, neighbours and friends.

There has been no proper consideration of the impact of the proposal to route all vehicular traffic wishing to leave Palmerstown Village to head east into Chapelizod or the City Centre or to travel into Old Palmerstown at The Oval. There is insufficient evidence that the traffic from the Church, Leisure facilities, industrial premises, shopping facilities, residential including the new 250 apartment scheme nearing completion have been properly considered.

The applicant's proposal for traffic to exit Palmerstown Village at the Applegreen Service Station will not be sufficient to cater for all the traffic that will wish to do so and for this reason the left turn out of the village at the Kennelsfort Road Lower / N4 (R148) junction should be retained.

- Removal of parking on Old Lucan Road and Palmerstown Village.

The applicant's proposal to remove / significantly reduce on street parking is heavy handed and takes no account of the needs of the living community in Palmerstown Village, or the need to retain some parking in order to maintain some viability for local businesses and for normal community activities. There is no proper regard taken of the needs of those attending church, religious ceremonies, visiting family, shopping, conducting business etc.

Alarming, part of the applicant's solution is to replace standard horizontal parking (which is safer) with the insertion of "nose in" parking on Old Lucan Road. This is inherently less safe and will entail vehicles being reversed out of such parking spaces into live traffic. This is not safe.

- The Oval Junction – exiting and heading west.

A large proportion of the vehicular traffic exiting at The Oval is looking to head west and currently can do so in a left filter lane and with a green filter light. The applicant's proposals to remove this filter lane will have serious negative impacts on the ability of traffic to exit at this junction. The proposed re-configuration of this junction will reduce capacity for traffic and will result in a major build-up of traffic which will affect this entire area of Palmerstown, close to the schools and local shops.

- The Oval Junction – Removal of left turn into The Oval / Palmerstown Drive area from the N4 (R148).

This proposal from the applicant will severely negatively impact the local community and will make the situation much more difficult and indeed dangerous. Currently, there is a short section of carriageway set aside for left turning vehicles. This works well. Under the applicant's proposal, it appears that this existing section of carriageway will be removed and instead vehicles will be positioned in a stationary position, in the middle traffic lane, with a green light, but waiting for the inside lane to clear of buses, cyclists, taxis etc before being able to make the turn in to The Oval / Palmerstown Drive area.

This is, by design, dangerous and it is hard to understand how the applicant thinks this is a good idea and an improvement over the current (working well) arrangements.

- The Oval Junction – new bus turning lane into Palmerstown Village from N4 (R148)

As outlined above, this new proposed intervention is not wanted and is not necessary. Its proposed introduction impacts very significantly on this junction and indeed on the entire of Palmerstown Village. This proposal was not properly assessed with the community of Palmerstown and has hugely significant and negative impacts on our community. Sending this bus route via Palmerstown Village in this fashion, will lead to a significant deterioration in bus options available to the entire community of Palmerstown. This proposal should be withdrawn.

- The Oval Junction - Pedestrians

With the retention in their current location (or close by) of the existing bus stops (see below) and the withdrawal of the proposed new bus entry into Palmerstown Village, the applicant could modify the overall proposal in order to retain, in general, the pedestrian and other traffic arrangements at The Oval. This retains the desire lines for pedestrians wishing to cross the N4 (R148) to continue on to Palmerstown Village or to access Chapelizod.

- **Bus Stops / Shelters**

- Living and Working community in Palmerstown Village, west of Kennelsfort Road Lower

The apparent complete removal of buses and bus stops from the community of Palmerstown Village, west of Kennelsfort Road Lower, presumably to facilitate cyclists, is absolutely appalling. This proposal will mean that hundreds of residents, many of them older and vulnerable, will be forced to travel over 1KM in order to reach the nearest bus stop or to reach home having gotten off a bus! This is unacceptable.

A reasonable available alternative to the imposition of a cycle route on the Old Lucan Road, which thereby removes buses, would be to utilise the existing County Council owned site at the western end of the Old Lucan Road and installing a cycle route connecting directly to the existing bus / cycle route on the N4 (R148). In this way, a bus service could be maintained for this section of Palmerstown.

- Removal of outbound Bus stop at Circle K, Palmerstown

This proposed removal of this bus stop has very significant negative impacts on the local community. This bus stop, which serves a huge population of this part of "Old Palmerstown" is very well used. Already, many of the population of this eastern end of Palmerstown have a distance over 400 metres to travel to and from this bus stop. Its removal will further distance this community from bus services and further isolate older and vulnerable residents in particular. The removal of this bus stop will mean that the nearest bus stop is not only further away but will be beyond the signalised junction at The Oval, meaning people will have to negotiate this junction, which they don't have to do currently.

If this stop needs to be removed (and there is no real evidence that it needs to be), a very reasonable available alternative would be to relocate the bus stop slightly west of its current location to an existing unused green space. With the CPO (if necessary) of a small section of this space, a bus stop, set back out of the bus lane, could easily be facilitated. This would significantly reduce the negative impact of the current proposal on the local residential community.

I request that the existing bus stop at Circle K be retained in its current location or relocated to the green space slightly to the west. It should not be moved beyond the signalised junction at the Oval.

- Removal of inbound Bus stop at Applegreen Service Station, Palmerstown

This proposed removal of this bus stop and relocation to the west of the signalised junction at The Oval will have very significant negative impacts on the local community. This bus stop, which serves the entire eastern part of Palmerstown and also serves Palmerstown Village, is very well used and is one of the most important bus stops serving Palmerstown. Again, many members of the community of Palmerstown have a distance of over 400 metres to travel to and from this bus stop. Its removal and relocation further west will further distance this community from bus services and further isolate older and vulnerable residents in particular. Moving this bus stop westwards beyond the signalised junction at The Oval will disadvantage everyone and will also require additional crossing phases for many pedestrians.

If this stop needs to be moved (and there is no real evidence that it needs to be), a very reasonable available alternative would be to relocate the bus stop slightly east of its current location to an existing unused green space, just beyond the Applegreen Service Station. With the CPO (if necessary) of a small section of this space, a bus stop, set back out of the bus lane, could easily be facilitated. This would significantly reduce the negative impact of the current proposal on the local residential community.

I request that the existing bus stop at the Applegreen Service Station be retained in its current location or relocated to the green space slightly to the east. It should not be moved westwards beyond the signalised junction at the Oval.

- o Reasonable Alternatives

It is incumbent on the applicant to have considered reasonable alternatives to the proposals it brings forward and in my view, and as outlined above, some available reasonable alternatives were not considered or were not properly considered.

An Bord Pleanála should consider the serious consequences of the impact of removing and/or inappropriate location of bus stops, specifically that this will discourage people from using buses and will result in a negative shift back to private cars.

Conclusion

In making the above observations, I wish to state that I fully support the overall principle of Bus Connects. The recent changes to the Bus Network with the introduction of the C Routes and other bus services have been very positive and are welcomed.

The problem is, that in seeking to now force through the physical changes to the public realm, the applicant has completely underestimated / understated the very real negative impacts on the community of Palmerstown. The applicant has ignored the very real sense of place that exists in Palmerstown Village and the wider Palmerstown area and instead is fixated on imposing its traffic corridor plans at the expense of the local community.

The proposal does not properly consider and report on the impacts of the scheme on the population of Palmerstown. The applicant seeks to overstate the positives of the scheme and completely ignores / downplays any negatives. For example: in *Chapter 23 - Summary of Significant Residual Impacts*, the applicant suggests that all of the residual impacts post implementation of this scheme are positive. This is patently untrue. It is not positive for huge sections of the population of Palmerstown, who have much longer journeys to make in order to reach bus stops, many of which bus stops are significantly further than 400 metres away from their homes. The residual impact of this scheme on older and vulnerable members of the community will be particularly significant and overwhelmingly negative. The findings within this chapter are simply impossible to believe and should be dismissed.

The applicant's stated objective with this scheme is: "The aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor".

The applicant has unfortunately, treated this application solely as a scheme to implement an improved transport corridor, without proper consideration of the impact on the community through which this transport corridor passes. For the community of Palmerstown, the proposal is flawed, does not properly consider the impact on our community, particularly the older and vulnerable members of the community and is not in accordance with the proper planning and sustainable development of the area.

I request An Bord Pleanála to:

1. Reject the application for the reasons stated above,
2. If not, I request an Oral Hearing and
3. I request that the observations above are considered:

Thereafter, if the Board are minded to consider broadly approving this proposal, I ask that the following amendments are imposed:

- Retain, in general, the pedestrian and other traffic arrangements at The Oval. This retains the desire lines for pedestrians wishing to cross the N4 (R148) to continue on to Palmerstown Village or to access Chapelizod. By retaining the current vehicular left turn option in to The Oval and out of the Oval heading west, it also avoids creating traffic hazards and serious safety issues for the local community.
- Withdraw the proposal to route the 26 bus route into Palmerstown Village at Applegreen Service Station. There is no demand for this and consequently there is no need being met by the applicant in seeking to introduce this change. This element of the Bus Connects proposal was brought forward at a very late stage by the applicant, without the benefit of any local discussion or consideration. It is not needed and is not wanted.
- Retain a bus service for the population of Palmerstown who live and work in the village area of Palmerstown, west of Kennelsfort Road Lower. Many of these people will, under the applicant's plans, have over 1km to walk in order to arrive at the nearest bus stop. Many of these people are elderly and many have mobility issues and it is simply unacceptable to treat them in this fashion.
- Retain the bus stops at the Circle K Service Station (outbound) and at the Applegreen Service Station (inbound) or relocate slightly to the nearby unused and available green spaces as outlined above.
- Retain the left turn out of Palmerstown Village on to the N4 (R148), heading east. There simply isn't capacity otherwise to cater for all of the traffic leaving the Village, wishing to head east.

Yours Sincerely,

Frank Lambe

Frank Lambe

(By Email)

