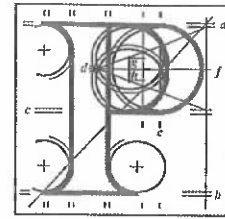


Our Case Number: ABP-314942-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Brian and Celine Lee
76 Wheatfield 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.

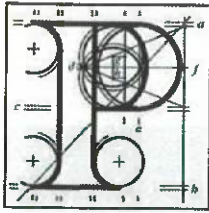
Yours faithfully,

Doina Chiforescu
Executive Officer
Direct Line: 01-8737133

HA02

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

Brian and Celine Lee

(b) Observer's
postal address

76 Wheatfield Road, Palmerstown, Dublin 20, D20
DY67

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal
address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

314942

- (b) **Name or description of proposed development**

Lucan to City Centre Core Bus Corridor Scheme

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

N4/R148/Palmerstown

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

Dear Sir / Madam,

Please find our below comments as residents of 76 Wheatfield Road, Palmerstown, Dublin 20, D20 DY67. I ask the board to consider the observations made below upon analysis of the NTA submissions to significantly change the public transport and traffic flow within Palmerstown.

The key point I would like to make in this submission is the ambiguity around population numbers within the area and the direct impact some of these changes have upon our most vulnerable residents as well as commercial businesses within the area. There is also no study surrounding the increase in recent population as per CSO 2022 reports, and any update to planning applications circa 2020/2021+.

I would also pose that NTA share an animated model of traffic flow based on their proposed changes and how it effects current traffic, particularly commercial traffic through Kennelsfort Road and Palmerstown village on the Old Lucan Road, and their predictions of changes. There is always the possibility their predictions are incorrect or fall short of population changes (Census 2022) which has the potential to increase emissions within Palmerstown if these works are implemented based on stale data.

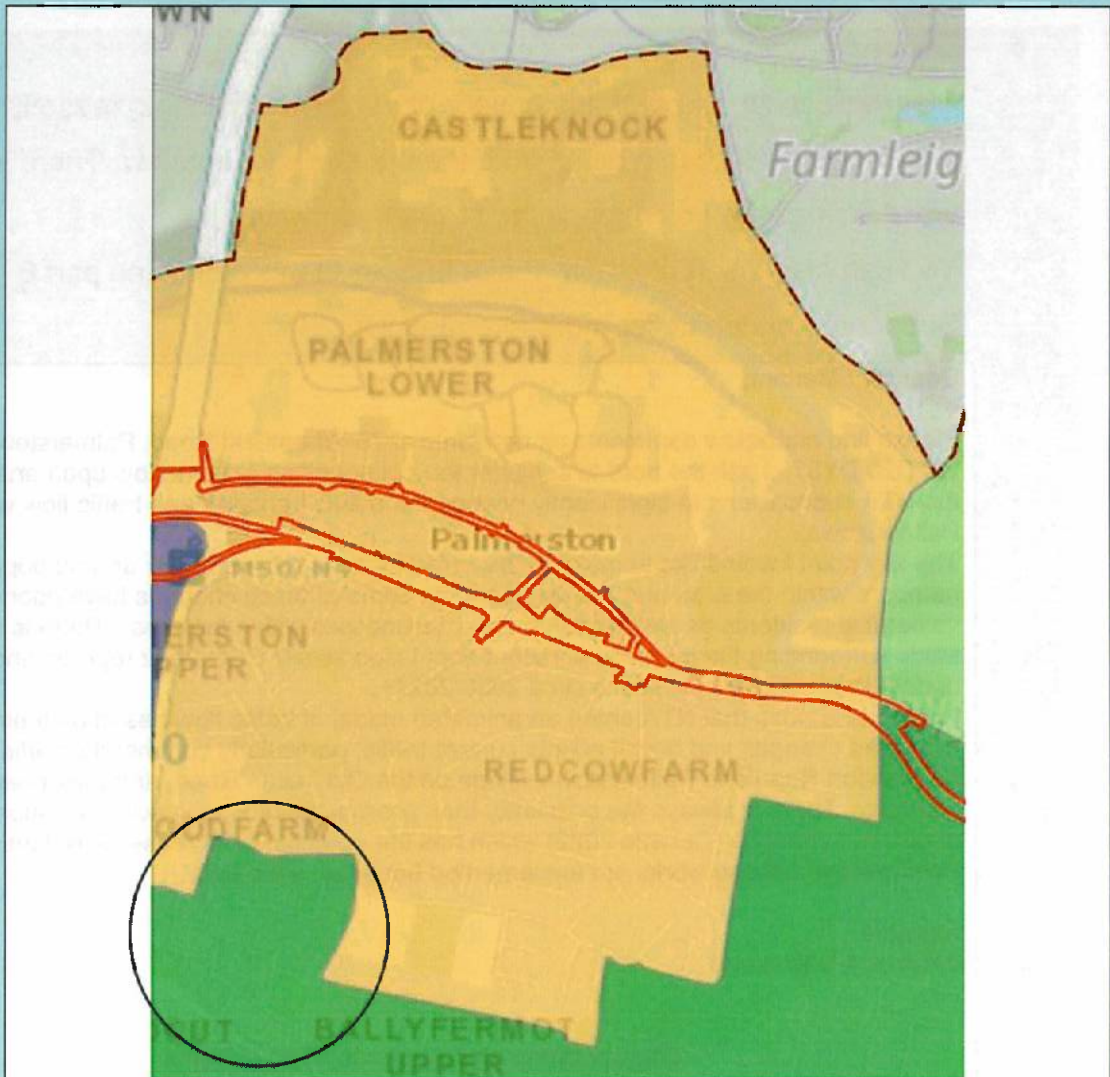
Regards,
Brian and Celine Lee

Observations and Analysis of NTA Plans

Population Study

The cohort for Palmerstown has been over exaggerated due to incorrect mapping of the area of Palmerstown ref <https://lucanscheme.ie/wp-content/uploads/sites/7/2022/10/Figure-10.1-3.pdf>.

5. Grounds



From the map above the area of Castleknock and Chapelizord are included within Palmerstown (ref Figure 10.1-3 pg 3), additionally the area highlighted with a blue circle is Palmerstown Court and Palmerstown Manor – two areas attributed to Ballyfermot which is incorrect.

Please note the following table with small area number to indicate population of Palmerstown:

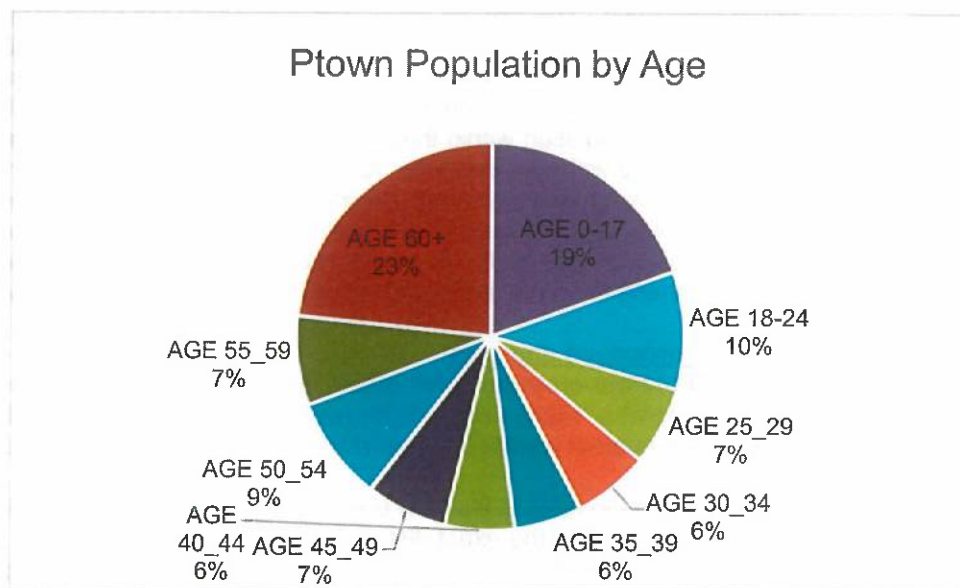
Location	Small Area Code
North Side of Old Palmerstown Village	267109015
	267109019
Rest of Old Palmerstown Village (includes Kings hospital and Irish town)	267109005
Woodfarm	267109018
	267109017
	267109014
	267109012
	267109011
	267109013
Palmerstown Court	267109016
Palmerstown Manor	267109009
	267109010
Oak Court	267108001
	267108011

5. Grounds

	267108012
	267108010
	267108009
Palmerstown Avenue	267108005
Kennelsfort Road	267108004
	267108003
Wheatfield Road	267108002
	267108006
Turret Road	267108008
Redcowfarm	267108007
Palmerstown Drive	267108013
Culmore Road	267108014
Gienaulin Road	267108015
Culmore Park/Woodfarm Avenue	267108016

*Omitted Whitethorn as unclear if classed under Ballyfermot or Palmerstown according to Census 2016

Using the above small area codes the actual population of Palmerstown as per 2016 census is 8,572 with 30% aged 55+ and of that percentage the highest proportion resides in small area 267109005 at 9% (this is the area where the bus stops are being removed on the Old Lucan Road).



Based on the incorrect classification of the Palmerstown population the table below indicates percentage of population that travel to work. It should be noted that only 40.81% of the Palmerstown population travel to work.

Community Area	Travel by Bus / Minibus or Coach	Travel by Car / Van	Travel by Train	Travel by Foot / Bike	Other	Total
Palmerstown Residents who travel to work	729	2365	21	339	44	3498
% Ptown residents	20.84%	67.61%	0.6%	9.69%	1.26%	100%

5. Grounds

who travel to work						
% Ptown residents who travel to work from total Population (8,572)	8.5%	27.59%	0.25%	3.95%	0.51%	40.81%

NB census codes used to calculate above:

- T11_1_BUW – Travel by Bus / minibus or Coach
- T11_1_CDW, T11_1_CPW, T11_1_VW – Travel by Car / Van
- T11_1_TDLW – Travel by Train
- T11_1_FW, T11_1_BIW – Travel by Foot / Bike
- T11_1_MW, T11_1_OTHW – Other
- Total is sum of above
- Not included in above is T11_1_NSW (not stated) and T11_1_WMFHW (mainly work from home)

Based on the population of 8,572 I've highlighted some key points derived below:

- NTA states there are 22 bus stops in Palmerstown (pg 10, Chapter 10 Population) it is actually 19 based on above small area codes. This reduces to 13 under the new plans with the bus stops being removed on the Old Lucan Road (highest proportion of 55+) and Palmerstown Drive (where 10% of population use bus stop).
- 1,529 of 8,572 report having a disability in Palmerstown which equates to 17.84% of the population. The highest areas with a disability are small area 267109015 (187) and 267109005 (171) which equates to 23% of disability population. Small area 267109015 also has the highest percentage of people with bad and very bad health (21 people of 150). I found no study to determine effects of the changes to the disability population within the proposals by NTA. As small area 267109015 is greatly affected with new bus stop, removal of car park spaces to the north of Old Lucan Road, left turn moved from Kennelsfort Junction to Applegreen junction, change to bus stop, increase in bus traffic and other traffic; I implore the inspector to reject said changes until a feasibility report has been submitted to determine the impact of these changes, not by NTA but by an independent reviewer.

Observations of proposed changes

1. Removal of Palmerstown Drive bus stop 2201 at Circle K Parkway West

Stated within the report a "slight disbenefit for residents of the area around Palmerstown Drive, for whom the nearest westbound bus stop will be at the Oval, approximately 200m to the west".

I find it very ambiguous to refer to the new bus stop location as approx. 200m west. A simple measurement will find the exact distance is 300m to the west.

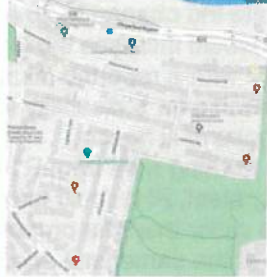
There is no further discussion within the report of the impact this will have to the local population. The table below indicates distance from drive bus stop, oval bus stop and new proposed bus stop on old Lucan Road.

Distance	Bus Stop 2201 (Circle K)	Bus Stop 7239 (Oval)	% increase of distance	Proposed Bus Stop Old Lucan Road	% increase of distance
Furthest point: 134 Palmerstown Drive	400m	650m	+62.5%	900m	+125%
Furthest point: 84-86 Culmore Road	550m (using lanes) 600m (using road network)	800m (using lanes) 800m (using road network)	+45.45%	1km	+81.81%

5. Grounds

Furthest point: 24 Glenmaroon Park	500m	650m	+30%	800m	+60%
Furthest point: 59-35 Glenaulin Road	700m	750m	+7.14%	1km	+42.86%

Please see map below to illustrate furthest residential points on the map:



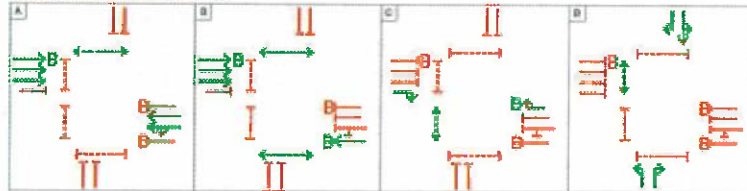
Using the small area census codes (267108015, 267108014, 267108013 & 267108016) there is a total population of 856 people which equates to 9.99% of the total population of Palmerstown with 13.38% of 55+ living within these four small area codes.

The proposed changes need to be evaluated further as it appears from the distance analysis that residents will have a greater commute than what is currently in place. I would ask the inspector does the removal of the bus stop counter NTA's objectives to make public transport more accessible and not in the interest of community?

2. Left turn at Oval heading westbound on R148 & dedicated bus lane

Throughout the NTA report there is conflicting and ambiguous information relating to turning left at the Oval. Based on the traffic sequence within the report, it appears general traffic (including turning left) will move separately to the bus lane.

INDICATIVE METHOD OF CONTROL



This sequencing appears counterproductive and to anyone it would make greater sense for the traffic heading eastbound to move together combining A and B in the above picture.

This would mean a reconfiguration of turning left to have the lane as it currently is or create Junction Type 2 below. Not considering these changes would inevitably reroute traffic to Kennelsfort road which will add to CO2 emissions, reduce access to residents, schools and commercial businesses on Manor Road.

7.4.2 Junction Type 2



Junction Type 2 illustrates a signalised junction in a multi-lane context, where there is room for additional lanes. The CBC maintains access to the left-turn lane and the dedicated bus lane. Both the bus lane and the dedicated lane up to the junction. An approach to any 30m+ bus lane 2m wide, there is a specific lane to allow left-turning in across the bus lane to ensure a dedicated bus lane, where space permits.

Junction Type 2 is chosen for the following reasons:

- Sub-urban setting will allow space to provide for a dedicated left-turning lane (optional).
- An approach to any 30m+ bus lane 2m wide, there is a specific lane to allow left-turning in across the bus lane to ensure a dedicated bus lane, where space permits.

In this instance, left-turning vehicles will proceed on a green phase with the bus lane. The bus lane is a dedicated lane for the bus lane and the dedicated lane up to the junction. An approach to any 30m+ bus lane 2m wide, there is a specific lane to allow left-turning in across the bus lane to ensure a dedicated bus lane, where space permits.

As an alternative to Type 2, the bus lane from the side road can proceed on the green phase. This is a more complex and the bus lane from the side road can proceed on the green phase. This is a more complex and the bus lane from the side road can proceed on the green phase.

5. Grounds

There are also dedicated cycle lanes missing heading westbound and eastbound on R148. As noted in Bus Connect Report pg. 13 cyclists preferred to use the bypass rather than deviating a longer route (using current bridge over M50 and cyclist traffic through Palmerstown village). This seems illogical to not have plans for cycle lanes and an expensive alternative to assume cyclists will use the cycle network being proposed in Palmerstown village, through Chapelizod.

3. Right turn heading west on R148 to Palmerstown village at Applegreen

The right turn to Palmerstown village, bus only, is to facilitate the change to 26 (now 80 bus). It is proposed to widen the road to facilitate this and would increase the level of traffic to this junction. As there is a high proportion of those with a reported disability within the census 2016 and those of poor health, it would be advisable for a disability feasibility study to determine if the increase of traffic would impact those of ill health.

There would also need to be a study to determine if a bus (turning right from R148) and 40ft truck exiting left (commercial businesses e.g. Kennedy steel, PH) could turn at the same time. Junction at old Lucan road/Kennelsfort road is wider than the proposed junction beside the Applegreen. If both are unable to turn at the same time and/or a 40ft truck/articulated truck are unable to turn left at the Applegreen junction this would then mean that traffic would have to either exit right or straight at the Kennelsfort/R148 junction, adding CO2 emissions and increasing pollution within Palmerstown.

4. Removal of bus stops on Old Lucan road heading west

The furthest distance on the Old Lucan road to the new bus stop is 1km, this greatly increases the commute for these residents wishing to take the 26 (80). Within this area there is a total of 326 residents above the age of 60 who are most vulnerable for the service. The bus stops also service Aldi and St Philomenas church. I would encourage the NTA to create an alternative solution to this particularly due to a high volume of residents in the 60+ category who most likely would require these services.

5. Left filter at Kennelsfort road upper/R148 bypass junction

The report indicates that the left turn from Kennelsfort Road upper heading east on the R148 will be removed. However, the Junction Systems Design indicates the left filter is to remain. See traffic scenario from pg 8 of Junction Systems Design at <https://lucanscheme.ie/wp-content/uploads/sites/7/2022/10/10.-Junction-Systems-Design-1.pdf>



I would implore the inspector to set a condition that the left filter, as per B of diagram above is implemented and not removed as traffic is significantly congested on Kennelsfort road, and not having this provision will increase traffic idling with higher emissions.

6. Double cycle lanes through Palmerstown village

According to the bus connect report (URL: <https://busconnects.ie/wp-content/uploads/2022/02/06-lucan-to-city-centre-report-on-cbc-public-consultation-3.pdf> pg. 13 and pg 28) it was noted that "cyclists prefer to cycle in the bus lane here as opposed to cycling through Chapelizod and Palmerstown due to the stop-start nature of the route and the current poor facilities".

It is noted again within the bus connect report (previous URL pg. 20) with a request for a cycle lane on the R148 highlighting the preferred use of cyclists. This is ignored with a provision for a two-way cycleway running the length of the Old Lucan Road.

5. Grounds

Considering cyclists can currently use the footbridge over the M50 into Palmerstown village to cycle, but don't, still preferring to cycle through R148. There has never been a reported cyclist incident in Palmerstown Village, the level of traffic at peak times is much calmer in comparison to the dual carriageway so why therefore do cyclists still use the dual carriageway/R148? Simply because it is a faster route.

I would implore the inspector to request NTA to conduct a behavioural report of cyclists who currently use the route heading east and westbound through Palmerstown on the R148 as to why they use the Dual Carriageway and not the route through Palmerstown village. This would seem appropriate before spending a considerable amount of money on infrastructure that may not move cyclists to a new double cycle route in Palmerstown village.

It should be noted there is no provision within the plans for a bike storage facility (like the one by Woodies in Lucan). This was a suggestion noted on pg 20 of the bus connect report (previous URL) but ignored by NTA. I would implore a reconsideration.

7. Removal of parking on the north side of the Old Lucan Road

A reference within the report states that all residential units on the Old Lucan Road have off street parking. This is entirely incorrect as there are a number of residents that must park on the road (e.g. cottages across from Stewarts hospital) and with new apartments being built/proposed within the area, this has the likelihood of increasing demand within the area.

The area that is east of the Junction of Kennelsfort road lower and the old Lucan road has the highest rate of those with disability and poor health. If parking is greatly reduced what impact will this have on carers, visitors etc.

From east of the junction of Kennelsfort road lower to the old Lucan road, there are a number of commercial entities (e.g. Kennedy Steel, Aldi, Coachhouse, St. Philomenas church), if parking is removed where are the alternatives? Private car parks are not the solution as this is private property and not guaranteed to remain open for users.

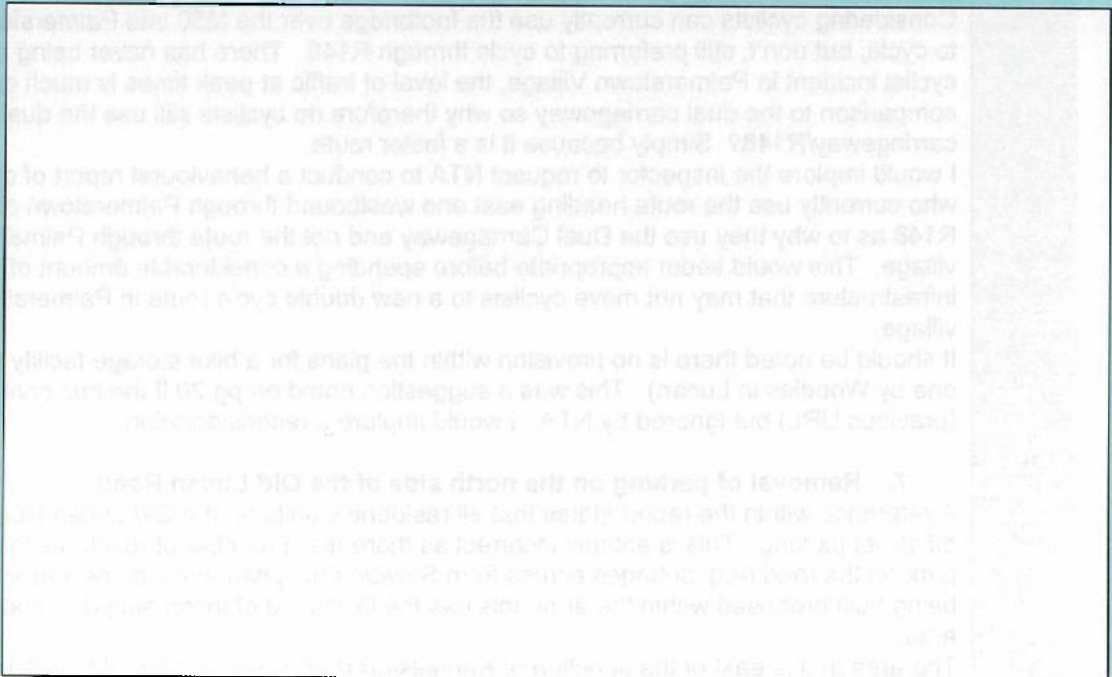
I would ask the inspector to consider if every resident of the new apartments (old Vincent Byrnes site) and new application for hotel were to park in the village would there be enough spaces? Also, how many commercial businesses would lose out to customers being unable to park. There needs to be further research to the impact of losing 108 parking spaces on the north side of the Old Lucan road (ref pg 57 Traffic and Transport).

8. Proposed pedestrianised crossing at Kennelsfort Junction/R148

It should be noted that Kennelsfort Road junction to the R148 is one of the busiest junctions with NTA noting 60,982 daily movements at this junction, followed by Applegreen 50,893. As it is one of the busiest junction's safety railings and a footbridge have been provided (for decades) for the safety of residents within the area. Within the NTA report there is no analysis of the slope of Kennelsfort road from the junction. If the pedestrianised crossing were to go ahead there would be no barrier to prevent wheelchair users or kids on bikes from rolling into traffic on slope. This raises significant safety issues particularly when this junction is used by families walking accessing the playground/swimming pool/Waterstown Park.

NTA should consider recreating the footbridge so it is easier to cross without using the pedestrianised cross (e.g. have stairs to the footbridge, elongate the footbridge so it's a gentler slope). An example to compare is at the Liffey valley bus stop (102511) which connects to Kings Hospital side.

5. Grounds



Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Board to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using the **online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes

