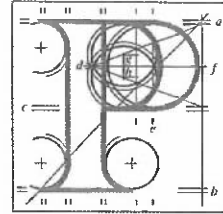


Our Case Number: ABP-314942-22



An
Bord
Pleanála

Donna Manning
20 Glenmaroon Road
Palmerstown
Dublin 20
D20 A312

Date: 17th January 2032

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

HA02

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

For the attention of:

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

<https://online.pleanala.ie/en-ie/sid/observation>

From:

Donna Manning
20 Glenmaroon Road
Palmerstown
Dublin 20
D20 A312

Proposed Strategic Infrastructure Development Application: Lucan to City Centre Core Bus Corridor Scheme (National Transport Authority application)

I wish to strongly object to the changes sought in the proposed development of the Lucan to City Centre Bus Corridor, specifically relating to the changes in relation to Palmerstown and R148. Please find my observations for consideration:

- What purpose does it serve by establishing a new route for the 26 bus through Palmerstown village? What are the benefits? Who requested the change? It is highly improbable that local residents requested this change. The Non-Technical Summary states the proposal will *"improve both the overall journey times for buses along the route and their journey time reliability"*. This is not the case by re-routing the 26.
- There is no justification for the 26 bus to loop around the Applegreen onto the R148 before going back onto the old Lucan Road to Chapelizod. If the bus is going through the village, it would make more sense to open the old Lucan Road behind the AppleGreen straight to Chapelizod for buses and cyclists only, slightly alleviating the junction of the massive additional volume of traffic.
- When the 26 bus turns right into Palmerstown village on the R148 heading west at the AppleGreen, where will it cross over from the bus lane/corridor into the allocated right turn for buses only, crossing two lanes of car traffic? The purpose of this proposal is to have a bus corridor, yet the 26 will be required to leave the bus corridor and cross two lines of traffic to turn right.
- It is acknowledged by all Palmerstown bus users, that buses coming from Lucan and beyond are usually full by the time they reach Palmerstown at peak times, resulting in commuters walking to the footbridge bus stop from the AppleGreen bus stop when they become desperate. However in recent times, with the introduction of additional 26 buses, the chance of getting on a bus in the morning has significantly increased but the 26 is not necessarily the preferred choice as the journey duration is longer. With the proposed change to the 26 bus route, commuters will have to make a decision on which bus stop to choose, risking buses at full capacity at both stops. It appears that BusConnects wants to filter all Palmerstown commuters onto the 26 without a choice.
- How will the new 26 bus stop on the old Lucan Road city bound at the Millbrook apartments, facilitate passengers boarding and alighting without danger to themselves or cyclists?

- According to the drawings, passengers will be required to cross the two way cycle lane to stand at the bus stop. Do the cyclists or commuters accessing the bus stop, have right of way across the cycle lane? What happens in the highly likely event, that there is no more space at the bus stop for passengers? It is envisaged that they will overflow into the cycle lanes. At peak times, the jostling to get onto an almost full bus, can be slightly aggressive and frantic. People with the sole focus of getting on the bus, will not be considering cyclists.
- The two R148 east bound bus stops will be very close together. Is it foreseen that different bus services will use different stops? If this is for consideration, it should be transparent to the public.
 - How will the old Lucan Road accommodate a 2 way cycle lane, perpendicular parking and 2 way buses? Is this road changing status given the anticipated increase in volume of traffic?
 - Removing the left turn out of Palmerstown village at Kennelsfort Road Lower eastbound onto the R148 and funnelling all traffic to the AppleGreen junction is incomprehensible. The AppleGreen junction will be responsible for all traffic heading east onto the R148 from the church, Palmerstown House, Stewart's Hospital and leisure centre, Aldi, Mr Price and all residents including the large apartment complex that cannot be accounted for at this point in terms of visitors, car users and provision of expected further development on the north side of the R148. A planning application for a hotel on the corner of the R148 and Kennelsfort Road Lower has been submitted. Are the NTA aware of this?
 - All traffic leaving the village at the AppleGreen are far more likely to cross the R148 and enter at the Oval rather than turn right, go to the next junction to turn left onto Kennelsfort Road Upper (their previous route). Turret Road, Glenmaroon Road and many others have been acknowledged as rat runs for decades with the number of cars increasing cumulatively year on year .
 - Heading west on the R148, this proposal changes the bus lane to continue up to The Oval junction with signage to read "NO LEFT TURN FROM BUS LANE". At present, the bus lane stops c. 20 metres from the lights to enable filtering to the left. How will cars turning left get across a line of buses without a filter? It's unsafe and likely to further exacerbate congestion on the R148 towards the city, with left turning cars blocking one of only two car lanes.
 - The Non-Technical Summary states "*the Proposed Scheme will provide benefits for cyclists and pedestrians*". Pedestrians currently have difficulty navigating the Oval junction e.g. pedestrian residents from Palmerstown Drive traversing the Oval to the west side of the Oval and vice versa. A huge number of adults and children (proximity to creches, nurseries, two national schools and students commuting by bus to other schools) are required to navigate this junction with difficulty, on a daily basis. There has been no consideration in the proposal to address this issue. Schools actively encourage and promote walking/cycling to school. With the increase volume of traffic expected at the Oval, there has been no consideration of pedestrian crossings. What is the justification for removing the bus stop at Palmerstown Drive?
 - The removal of the left filter from Kennelsfort Road Upper onto the R148 heading west will result in substantially further congestion on an already seriously congested road.
 - The proposed continuous bus corridor up to and across the M50 interchange westbound, resulting in the dual carriageway losing a lane at the interchange, will result in further backed up traffic on the R148 westbound, impacting drivers exiting onto the R148 from Palmerstown north and south. At present, the M50 interchange significantly slows as cars merge onto the N4 from the M50 at Liffey Valley.

- Why has an additional pedestrian crossing been added at the pedestrian bridge? Is it specifically for cyclists? Can the existing traffic lights be upgraded to include bicycle signalling? Priority appears to be allocated to traffic flow therefore there's concern regarding the sequencing/allocated timing of pedestrian crossings at both junctions on the R148.
- The eradication of three filter lights will result in further significant issues for residents trying to enter onto the R148 which is already a massive issue. As it currently stands, cars turning left onto the R148 from the Oval struggle to merge and oftentimes, are forced to resort to using the bus lane illegally to enable more cars to merge.
- Working in the city centre, I have access to a car space but have always chosen to use public transport. I cannot believe that these changes and predicted disorder, could make me consider driving into the city rather than continue using public transport, of which I have very much appreciated for the past 25 years.
- The Non-Technical Summary states *"The primary objective of the Proposed Scheme, is the facilitation of modal shift from car dependency through the provision of walking, cycle, and bus infrastructure enhancements thereby contributing to an efficient, integrated transport system and a low carbon and climate resilient City"*
- I fully appreciate the research, ambition and targets set to improve and encourage less car dependency for all the reasons stated. However, it is clear that all the proposed changes are to prioritise bus corridors and cycle lanes to achieve these targets without any consideration for Palmerstown residents and their tributary roads. The majority of cars in Palmerstown that require access to the R148 are not commuting to the city. The R148 is an artery running directly through the locality with schools, supermarkets, churches, hospitals, leisure facilities, community centres and much more. Local residents cannot use public transport or bikes to do their supermarket shop. The many elderly residents in Palmerstown cannot go to mass on foot. Patients cannot go to hospital on a bus or a bike, the list is endless but it appears that none of these people have been considered in the proposal.
- It is for these reasons that I strong object to the proposal specifically in relation to the Palmerstown changes.

Donna Manning

