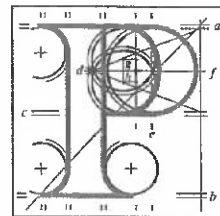


Our Case Number: ABP-314942-22



An  
Bord  
Pleanála

Guss O'Connell  
47 Palmerstown Green  
Co. Dublin

**Date:** 8th February 2023

**Re:** BusConnects Lucan to City Centre Core Bus Corridor Scheme  
Lucan to Dublin City Centre

Dear Sir,

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.

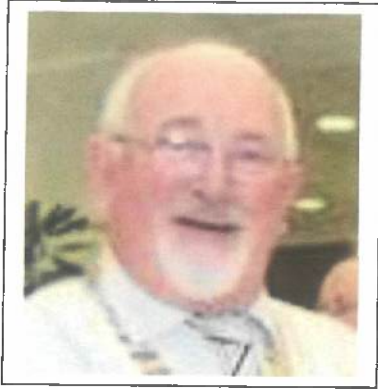
Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Doina Chiforescu  
Executive Officer  
Direct Line: 01-8737133

|                    |         |                  |
|--------------------|---------|------------------|
| 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              |



**COUNCILLOR GUSS O'CONNELL**

**PEACE COMMISSIONER**

**REP FOR PALMERSTOWN & NORTH CLONDALKIN**

47 PALMERSTOWN GREEN [REDACTED]

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

|                         |                              |
|-------------------------|------------------------------|
| <b>AN BORD PLEANÁLA</b> |                              |
| LDG-                    | <u>060542-23</u>             |
| ABP-                    | _____                        |
| 11 JAN 2023             |                              |
| Fee: €                  | <u>50</u> Type: <u>cash</u>  |
| Time:                   | <u>10.23</u> By: <u>hand</u> |

A Chara,

### LUCAN TO DUBLIN CITY CENTRE CORE BUS CORRIDOR SCHEME

On behalf of the many constituents who have contacted me, and on my own behalf, I wish to make a number of observations and recommendations on the proposed Lucan to Dublin City Centre Bus Corridor. I do so as a resident and public representative for Palmerstown but also with the needs of the wider community very much in mind. I have attended every Busconnects public consultation/briefing (since the first one in the Maldron Tallaght in 2017) that affects South Dublin County.

**1.GENERAL OBSERVATIONS AND COMMENTS.** First of all, I want to state that I am supportive in principle of what Busconnects stand for. In particular I endorse the policy as expressed in the Introduction to the above scheme, *"BusConnects is the NTA programme for improvement of bus services in Dublin and other cities across Ireland and is a key part of Government policy to improve public transport and address climate change. The key elements of the strategy as it applies to Dublin are: à A network of continuous bus priority and safe cycling facilities along 16 corridors; à A redesigned more efficient bus network with high frequency spines, new orbital routes, and increased bus services; à More user-friendly and convenient service."*

That is a noble objective, but the detail is in how it is applied and works in practice at each local level. *Retrofitting transport infrastructure in an area such as Palmerstown, which already suffers from the effect of bad planning, is not easy and requires a good deal of local knowledge, or at least local consultation.* And the first comment I would make is that there is very little evidence in the various Lucan to City Scheme reports that local conditions or experience has been factored in. Where it refers to taking on board the views of the Local Authority, the Report is very selective as I will illustrate below (especially in relation to the Kennelsfort Road and Oval junctions, and the proposal to alter the Bus Service through Palmerstown Village).

The R148, and the Palmerstown Bypass, is one of the arteries to and from Dublin City and should be facilitated in its role with the least disruption to the community of Palmerstown, while also serving the people of the area.

It needs to be noted that what is now planned (Lucan-City Scheme) is one of two Bus Corridors serving Palmerstown and the wider area. This will be supplemented later by further transport developments especially the Luas to Lucan which will have a significant impact for the commuting public as indicated by the following policy statement *“Within a broader corridor two Core Bus Corridors were identified to meet the transport demand. The first, (the Proposed Scheme) along the N4 will cater for demand close to Lucan Village as well as from Palmerstown towards the city centre. The second, the Liffey Valley to City Centre Core Bus Corridor, is intended to cater for any specific demand that will not be catered for by the proposed new Luas line to Lucan. Both Core Bus Corridors will aim to link origins and destinations not served by the fixed heavy rail lines.”* (Alternative Ch 3 P 6). *It follows, that the Lucan to City Centre BusConnects Scheme as it passes through Palmerstown should serve the Community but not unduly interfere with or undermine the environment or community integrity.*

I acknowledge that An Bord Pleanála is asked to make a judgement on the infrastructural elements of the Scheme but it needs to be acknowledged that Bus infrastructure and Bus routes are intrinsically linked. I ask that my reference to routes be seen in that context. In my opinion, the Scheme as proposed, which quite rightly prioritises Bus services, fails to acknowledge that for the foreseeable future *(until we have in fact developed a reliable and efficient Public Transport Service) private cars should be facilitated* (where they share the same road space, as I show at Kennelsfort Rd below).

The South Dublin County Council Development Plan needs to be factored in throughout as in the following *“The social, economic and environmental wellbeing of South Dublin County and the Dublin Region is dependent on the efficient and sustainable movement of people and goods within and through the County. An overarching policy is to rebalance transport and mobility within the County by promoting ease of movement by sustainable modes (including walking, cycling and public transport). This will provide for the freeing up of road space for essential functions such as, public transport and emergency vehicles. It will also allow for commercial transport which is essential to economic growth. In doing so, the Council will continue to provide for all elements of the transportation network that are within its remit and will engage with external agencies including the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) to assist the delivery of sustainable transport projects that are provided at a regional or national level.”* (South Dublin County Development Plan 2022-2928 7.3 Overarching Policies and Objectives. My emphasis).

The traffic (60,000 per Day at the Kennelsfort Junction) that flows through the R148 for the most part does not originate or seek to benefit the local community. It has every right to access the City and/or the West. However, it should not unnecessarily discommode the Palmerstown Community which it does with traffic being stacked up from the West (N4 and M50) mornings,

and from the City from about 3.30pm daily. The resultant air and noise pollution is unwarranted and an avoidable health hazard. The proposed configuration of both the Kennelsfort Road and Oval junctions will exasperate a very bad situation. Any changes to the Kennelsfort Road or Oval junctions should not make the present situation worse.

**2.KENNELSFORT ROAD and THE OVAL JUNCTIONS** As a public representative since 1991, I have engaged with every plan that effected my area. Most recently, we concluded the review of the South Dublin County De=elopement Plan, which was approved by the elected members after many hours of intense study and debate. This has been referenced extensively (in the EIAR Vol 2 report) but very significantly it fails to even mention the following (it is the policy of the Council ...)\_*“To work with the NTA and other state agencies to facilitate the delivery of the Kennelsfort Road-R148 grade separated junction or an equivalent solution to maximise the efficacy of the BusConnects Project” (SM3 Objective 17: South Dublin County Development Plan 2022 – 2028).*

The lack of reference to this objective is hard to understand when the EIAR Report states *“During design development, information obtained from bus journey time data over a typical period in 2019 indicated that there is a reasonably consistent journey time along this corridor, which reflects the presence of existing bus lanes. However, as noted above there is some noticeable variation in journey time, for example between the N4 Junction 2 (Hermitage Clinic) and the R148 Palmerstown bypass / The Oval junction during both peak periods. This is consistent with observations on site and the lack of bus priority across the M50 and through the highly congested junctions on the Palmerstown bypass” (EIAR Vol 2 Page 19).* Any reconfiguring of the Kennelsfort Road junction should improve traffic flow and reconnect the two sides of the Palmerstown Community and in the process eliminate the Bus/Public Transport bottleneck.

BusConnects should now take the lead role in providing the segregated junction, or an alternative, at Kennelsfort Road and in the process eliminate the traffic controls at the Oval. This has been an objective of successive South Dublin County Development Plans since 1992. This will not only provide a freeway for Buses (and emergency and commercial traffic) on the R148 and Kennelsfort Road but contribute very significantly to the reduction of CO2 gases, loss of person hours sitting in traffic and significantly contribute to a much cleaner environment. This should receive serious consideration by An Bord Pleanala. If this is agreed and implemented, then much of the remaining proposals (re the Kennelsfort Road and Oval junctions) will be surplus and the Lucan to Dublin Bus Scheme will be a success.

Whatever decision is reached in relation to the Kennelsfort Road and Oval junctions at Palmerstown, ALL traffic. Including Buses, on the outward carriageway of the R148 must travel at a speed that recognises that they are coming from a City Centre environment, travelling through a residential area and entering an area where traffic is weaving to access the M50 South and North and the N4 ,and in the process, is blending with traffic coming from the M50 North and South between the Oval on the Palmerstown Bypass and Exit 2 in the N4..

The redesign of the Kennelsfort Road junction as now proposed will not alleviate the congestion at this location. In fact the proposed removal of the slip lane to the left from Upper Kennelsfort Road, will result in further congestion and will adversely affect Bus services and result in Buses queuing on Kennelsfort Road Upper to get across the junction. The proposed closure of the slip lane from Kennelsfort Road lower towards the City will cause further traffic chaos in the Village and Old Lucan areas without in any way facilitating the Bus services. The slip lane here should be retained and synchronised with the arrow controlling traffic entering Kennelsfort Road Lower from the City end.

The slip lane at the Oval facilitates both adjacent Primary Schools (St Lorcan's and St Brigid's) as well as the busy commercial zone at Manor Road and prevents vehicles, including private, commercial and school buses from being stacked up polluting a residential area. This slip road also provides for the considerable traffic that wishes to proceed from the residential area to the Palmerstown Village area.

It should be noted that after considerable reflection the South Dublin County Development Plan 2022-2028 sets targets that *"expect to see walking increase from 13% to 15% and cycling double from a low base of 5% to 10%. Bus mode share would increase from 17% to 20% while rail mode share would increase from the current very low level of 3% to 5%. These incremental increases in mode share would result in the decrease in private car use from the current high level of 62% down to 50% during the County Development Plan period (2022-2028)"*. The slip lanes at both Kennelsfort Road and the Oval should be retained for at least the time frame of the current South Dublin Development Plan if this transition is to take place.

The proposal to allow a right hand turn and open a new Bus Lane at the Oval to the Old Lucan Road from the R148, does not make sense and will further exasperate the Outbound Buses, Emergency, Business and private traffic with the resultant congestion, which at present can stretch from the Con Colbert Road to the Oval from 4.00pm to 7.00pm most days. It will also result in additional traffic and congestion on the Old Lucan Road and Village area, with the resultant pollution. without any gain to the residents or indeed the (26/80) bus patrons. In addition, the creation of an additional Bus Lane to facilitate the right turn into the Old Lucan Road will both cause further tailbacks (for all traffic including Buses attempting to manoeuvre across traffic lanes) and be a serious dangerous hazard for all drivers on the outward carriageway of the R148. The proposed right turn into the Old Lucan Road for Buses at the Oval should be dropped

The proposal to eliminate the left access to the Bus Lane for traffic exiting the R148 at the Oval on the outward journey will create both traffic congestion and a highly dangerous situation as traffic in the middle lane attempts to cross the Bus (and public service, including Emergency Vehicle and Taxis) lane.. It is imperative to retain the current access to the Bus lane or that the middle lane becomes the through Bus lane leaving the left lane for vehicles turning left into the Oval.

**3. PEDESTRIAN AND CYCLE ROAD CROSSING OF THE R148.** The present arrangements, a bridge at Kennelsfort Road over the R148 and a surface crossing at the Oval are not consistent. Neither is the proposal for two Toucan crossings sustainable. They will not create a safe crossing at either location and do nothing to aid the flow of traffic, including Buses. The gradient at Kennelsfort Road Upper is dangerous for anyone in a wheelchair or for children on bicycles. The current pedestrian bridge should be modified to provide a more user friendly approach slipway in both directions (there is sufficient room) as well as a new set of steps on both sides for the able bodied to reach the bridge. For cyclists, the cycleways on Upper Kennelsfort Road are already a hazard which is outside the scope of the present study and which needs to be addressed by the Local Authority. I

n the meantime, cyclists can cross the R148 in similar dedicated cycleways in tandem with motorised traffic. At the Oval, either an overhead bridge or an underpass should be provided for pedestrians. Cyclists should cross with motorised traffic and be facilitated by a dedicated cycleway onto the Old Lucan Road at the Service Station. The preferred solution would be an underpass at Kennelsfort Road.

**4. CYCLEWAYS** The proposed cycleway West through the Old Lucan Road cannot be justified in terms of community infrastructure or financially. This road is a cul de sac and in every respect is an estate road. While serving a number of commercial enterprises and a number of places of worship and a Parish Centre, with its 30 kph speed limit and some traffic calming, it is relatively safe for cyclists at present. The proposed cycleway will seriously and unnecessarily interfere with the residential quality of life for residents. It will unnecessarily interfere with private parking traditionally enjoyed by residents and patrons of the Churches.

There is an alternative which can link the cycleway at the bridge over the M50 with the cycleway coming from the City and Chapelizod at the Oval. All that is required is to CPO some land at the M50 end of the road leading onto the green area to the north of the slip road coming from the M50 and the R148 and construct a two way cycle track on this margin to the Oval where it links up with the cycle way coming from the City and coming from the estates at the Oval. On the way it will link with the cycleway on Kennelsfort Road.

**5. BUS SERVICE THROUGH PALMERSTOWN VILLAGE** Currently, the 18 route services the Village area. This is a very popular service connecting not only residential estates but also two churches, a shopping centre and a number of business as well as the Parish Centre and two creches with the (otherwise divided) greater Palmerstown Area and beyond. This service operates as a real "link" for people with other public transport right across to Sandyford. The current plans indicate removal of the current bus stops, therefore removing the service. This service operates very successfully on the current infrastructure and there is no need to do anything except retain the current bus stops including in Kennelsfort Road Lower. The current bus stops and terminus on the Old Lucan Road and Kennelsfort Road lower should be retained. There is huge local support for this service.

There is no demand, expressed wish or welcome locally for the proposed diverting the (26/80) bus service into and through the Old Lucan Road East/Palmerstown Village Area. I, and others, have made this point very forcefully at previous consultations. The diverted service disenfranchises people from the Oval and inner roads who will have current access to the 26/80 removed unless they travel the additional distance to the Old Lucan Road. This is contrary to the intention to make Bus services available to all within a given radius. The current service (26) provides a vital link with our sister community of Chapelizod. In addition to a shared Credit Union (at Manor Road Palmerstown) there are shared schools (Pobalscoil Iosolde on Kennelsfort Road takes its name from Chapelizod) and the primary schools in Chapelizod are feeder schools for Pobalscoil Iosolde. In addition, many residents of each community use a services such as Doctors in the other area. The removal of the 26 service from the bus stop sin both directions on the R148 will disenfranchise a huge number of people across Palmerstown and Chapelizod and beyond. It needs to be understood that at present the current 26 provides a vital link with the C Bus Service (linking it also to the Liffey Valley Service). All of this will be lost if the service is diverted into the Palmerstown Village area.

Residents in the Village, including the new Apartments at Palmerstown Gate, have access to a more reliable, frequent and diverse service on the R148 which is on their doorstep. Their wish and the wishes of residents on the Old Lucan Road and adjacent estates, is to retain the 18 Bus service and the current 26 service route..

In addition, the proposal to operate (26/80) Bus service through Lower Kennelsfort Road and turn right to travel down the Old Lucan Road East will add to the traffic chaos given that all traffic from the other end of the Old Lucan Road, the estates off it, from ower Kennelsfort Road including people from Palmerstown Gate Apartments and proposed Hotel will have to travel the additional journey to the proposed (only) exit left to the City at the Oval. All of this brings a huge amount of additional traffic, and attendant pollution and safety hazards, to this relatively quiet Village area.

The proposed bus stops on the Old Lucan Road to facilitate this service are positioned almost opposite each other and if buses from opposite directions arrive together will cause traffic congestion or even chaos. It has already been accepted that residents of Red Cow and Woodfarm Cottages do not have facilities for off street parting. The proposal to reconfigure on-street parking with nose to kerb instead of parallel as at present, will create a safety hazard and make it more difficult for residents (who may be physically or visually impaired) to get in and out of their vehicles. The relocation of disabled parking, and the loss of paid parking spots to facilitate a bus service that no one wants is a further unnecessary hardship and unnecessary expense.



Much more serious is the proposal for a Bus stop in front of No 1 to 3 Woodfarm Cottages. Despite information to the contrary in the EIAR, these buildings are listed in Chapter 3 of the South Dublin County Development Plan 2022-2028 (Ref 3.5.3. Architectural Conservation Areas . ACA). Which also includes a full description, including the significance of the original iron railings of the significance of these cottages. The significance of Palmerstown Village in relation to the Liffey Valley Special Amenity Area is also referenced in the South Dublin County Development Plan 2022-2028 (Ref Chapter 3 NCBH6 Objective 7) where specific reference is made to the built heritage of Lucan and Palmerstown Villages. A Bus stop with raised platform and Bus Shelter as proposed would totally disfigure this unique streetscape and cannot be tolerated under any circumstances. Especially as the proposed diverted Bus route will only frustrate passengers diverting through an area that only adds to travel time..

I have already covered, at 2 above, the junction and traffic implications at the Oval as a consequence of diverting the 26/80 bus service in and out of the Old Lucan Road and the Village area. It is self-evident that the proposed infrastructure required to facilitate such a change would be very expensive and disruptive at the construction phase and would be an ongoing hazard , which would also totally undermine the heritage character of Palmerstown Village when it enters the operational phase.

It is obvious that any serious research or study of the road network in the area to facilitate a Bus service through Palmerstown Village and the Old Lucan Road East, would find that a more practical route would be to reopen for Buses only the part of the Old Lucan Road that extends to Chapelizod and run the bus in and out that route. It makes no sense to take the 26/80 as proposed in and out of the R148 at the Oval with no bus stops in either direction between the Old Lucan Road and Chapelizod.

It is worth noting what the South Dublin County Development Plan 2022-2028 has to say in relation to retrofitting Bus infrastructure: "To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages." (South Dublin County Development Plan 2022-2028 AM3 Objective 11). The proposal to divert the 26/80 route through Palmerstown Village and Old Lucan Road East, is in direct contravention of the Local Authority policy.

It is strongly recommended that the proposal to build infrastructure for a (diverted) bus route through the Old Lucan Road East and Palmerstown Village be removed from the Lucan to City Scheme.

**5,BUS STOPS** Two Bus stops on the City bound direction and two on the return journey would support a good bus service. The proposed location at the City side of Kennelsfort Road is acceptable but the second one would be best located to the City side of the Service Station. This is a safer option where pedestrians to not have to cross the old Lucan service road. There



is adequate green space at the City end side of the Service Station to provide for a Bus layby. On the outbound journey, the Bus stop at Palmerstown Drive is very important for commuters from the Drive, Colmore, Glenaulin and Oak Court Lawns/Glenaulin Estate. On the other hand, the one at the Oval is close to the one at Kennelsfort Road (no bus traveller goes forward at this point, all return towards the Oval junction). The proposal to recess this stop would result in seriously undermining the privacy of the residences at the end of Palmerstown Ave. The Palmerstown Drive Bus Stop should be relocated and recessed at the green space midway between the current location and the Oval junction and incorporate the Oval Bus stop.

**6. SERVICE AND MACHINERY STORAGE COMPOUNDS** The following is a direct quote from EIAR: Construction Compound (LU2) is proposed north of the R148 Palmerstown Bypass, on the M50 Junction 7 to Con Colbert Road section of the Proposed Scheme. This is a greenfield area planted with a single line trees in recent years (shown on aerial imagery prior to 2013 without trees). It functions as a verge for the R148 Palmerstown Bypass dual carriageway. It lies within the Proposed Scheme boundary and has been identified as an area for landscape improvement. No features are depicted within the site on the historic mapping.

“The land was under agricultural fields from at least the 18th century. The level surface of this greenfield area and its position alongside the dual-carriageway suggests a degree of ground disturbance in the past. Additional disturbance from the tree planting will have further reduced any inherent greenfield archaeological potential. There are no known or recorded archaeological sites within or in the vicinity of the proposed compound area. The archaeological potential of this site is considered to be negligible.” (Chapter 15, P22 EIAR Vol 2). What is not included is the fact that this is traditional swamp land and since the work got underway at Palmerstown Gate underground car park, considerable flooding is reported in the back gardens of the houses on the Old Lucan Road backing onto this green area. Contrary to the report, the mound here has not been disturbed in over 30 years.

Also the area contains a long established Badger set and the trees provide feed for the bat colony in Mill Lane/Liffey Valley (acknowledged to be the most significant Bat colony in the EU). This green space should not be interfered with and is totally unsuitable for a service compound. Similarly, the proposed machinery compound at the green space by the Oval would create a serious health and safety hazard due to its proximity to St Lorcan's and St Bridget's primary schools. It is strongly recommended that An Bord Pleanála rejects the proposed use of the materials and machinery compounds located at the Palmerstown Bypass adjacent to the Village at Kennelsfort Road and the Oval.

7. SUMMARY The following quote from the South Dublin County Development Plan 2022-2028 is worth noting: "National Policy Objective 64 of the NPF states 'Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car.',(CDP Ch 7)

- ✓ It is my contention that the Lucan to City Centre Scheme does not deliver on the above.
- ✓ For the reasons set out above, the scheme is seriously flawed and must be rejected in its present form by An Bord Pleanala.
- ✓ The Lucan to City Busconnects as it sets out to serve the R148/Palmerstown Bypass as currently proposed does not meet the required criteria, for proper Bus structures along this route and consequently does not serve the needs or interests of the Palmerstown Community.
- Accordingly, I am asking that it be rejected by An Bord Pleanala.
- ✓ I am requesting that an Oral hearing take place where I and the Palmerstown Community can elaborate on the points raised.

I attach the €50 fee.

Yours truly



Guss O'Connell PC  
10<sup>th</sup> January 2023