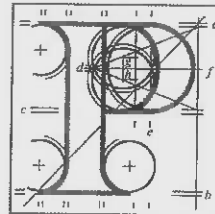


Our Case Number: ABP-314942-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Mary and David Ong
52 Wheatfield Road
Palmestown
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	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

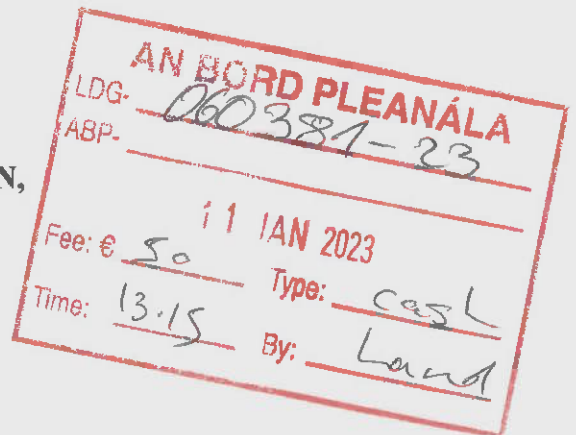
PLANNING AND DEVELOPMENTS ACTS 2000-2021
PLANNING AND DEVELOPMENT (STRATEGIC INFRASTRUCTURE) ACT 2006

STRATEGIC INFRASTRUCTURE DEVELOPMENT

**PROGRAMME TITLE: BUS CONNECTS DUBLIN CORE BUS CORRIDORS
INFRASTRUCTURE WORKS**

**PROPOSED DEVELOPMENT: LUCAN TO CITY CENTRE BUS CORRIDOR
SCHEME**

**TO: THE SECRETARY,
AN BORD PLEANALA,
STRATEGIC INFRASTRUCTURE DIVISION,
64 MARLBOROUGH STREET,
DUBLIN 1, D01 V902.**



OBSERVATIONS BY:

**NAME: MARY ONG AND DAVID ONG,
ADDRESS: 52 WHEATFIELD ROAD, PALMERSTOWN, DUBLIN 20.**

We wish to make the following Observations on the Proposed Development of the Lucan to City Centre Bus Corridor Scheme, at the Palmerstown area, as follows:

1 Proposed Two Lane Cycleway in the Village of Palmerstown

We support the introduction of segregated cycleways in the city of Dublin. However, the proposed route for the two lane cycleway through Palmerstown Village is not the correct one. Palmerstown Village as it exists now is a quiet village and is very safe for cyclists given the wide roads within the Village having been part of the old N4 road. This is even after on street parking is taken into account.

The proposed two lane cycleway will result in significant disruption to the residences and businesses in Palmerstown Village. The Old Lucan Road/Lucan Road through the Village will be narrowed considerably which is wholly unnecessary. The Old Lucan Road/Lucan Road being a former national graded road is sloped from the centre, and will require significant amount of works to level it on its entire length through the village, which will be costly and which will cause major disruption for a considerable period while these works are ongoing.

The plan for the two lane cycleway will require the removal of a significant amount of on street parking in the Village, especially outside St Philomena's Church, Lower Kennelsfort Road, and outside Woodfarm Cottages and Redcow Cottages (collectively referred to as "The Cottages"), without any adequate replacement of parking spaces lost.

It is disingenuous to suggest that parking is adequately addressed with the traffic from the Church for busy occasions such as weddings or funerals being accommodated on private property (ie Aldi carpark across from the church) or on the side roads leading into various residential cells where children may be playing.

The Cottages are in an area of architectural conservation, and do not have private driveways and rely on the existing on street parking. A new development which is due to open in the next 12 months at Palmers Gate on the old Vincent Byrne site in the Village, and this development comprises over 250 apartments with significantly fewer carparking spaces provided within the development. The shortage of parking space within Palmers Gate development is going to lead to severe parking congestion within Palmerstown Village. The failure of the proposed NTA/Bus Connects plan to address adequate parking in the Village will only make this situation a lot worse.

Changing the existing on street parallel parking to a perpendicular parking at the vicinity of the Cottages is wholly unsafe if the Lucan Road is narrowed as proposed. Perpendicular parking is only suitable on wide roads, as the vision of the parked car reversing onto the road could be hindered when reversing out, and is also necessary to give oncoming vehicle sufficient time to see the parked car starting to reverse out. The perpendicular parking will be even more dangerous if there are going to be buses on the Lucan Road passing next to these parking spaces. The danger is also amplified with heavier traffic expected on that section of the Lucan Road as a result all the traffic in the Village intending to turn towards the City Centre being directed towards the Oval/R148 junction (if the left turn on the Kennelsfort Road/R148 junction is removed).

The proposed perpendicular parking outside the Cottages and at the junction with Mill Lane, is also unworkable as there are large vehicles/lorries coming in and out of the Mill Lane during the day, and these vehicles will not physically be able to complete a turn safely if there are cars parked in these perpendicular parking spaces.

It is submitted that the two lane cycleway from inside the M50 at Palmerstown should follow route of the R148 as far as possible. There IS access from the Old Lucan Road in Palmerstown Village to the R148 opposite the now closed Beehive Restaurant though a disused laneway which could easily be converted into a two lane cycleway. This disused lane is NOT in private ownership. The two lane cycleway will follow this disused laneway from the Old Lucan Road to the R148 and then proceed alongside the R148 and will only re-enter the Village at the Oval/R148 junction going behind the Applegreen service station. There is a significant area of grassy embankment running next to the length of the R148 between the M50 and the Applegreen service station which can accommodate a two lane cycleway without impacting upon the trees and other flora situated at the grassy area. This two lane cycleway will be situated sufficiently in from the left hand verge of the R148 to be safe for cyclists.

The approximate route has been included in a number of Maps annexed to this Observation. This route can be surveyed and measurements included on a more detailed plan or map if so required. The advantage of this route for a two lane cycleway is that it will have minimal

disruption to the residents and businesses in Palmerstown Village and the associated problems identified above. The proposed two way cycleway along the Lower Kennelsfort Road to the Kennelsfor Road/R148 junction will not be required either. It is submitted that the overall cost of this alternative route will be significantly less than the route proposed by the NTA/Bus Connects.

2 Proposed Re-routing of Bus No 80 (formerly Bus No 26) into and out of Palmerstown Village at The Oval/R148 junction and The Kennelsfort Road/R148 junction.

There is no useful purpose to be served by having the No 80 (No 26) bus entering Palmerstown Village where the existing bus service at the R148 is already working very well for the residents and bus users at both Palmerstown Village and Palmerstown situated at the other side of the R148. The overwhelming majority of bus users in Palmerstown do not support the proposed changes and this will be borne out if the NTA/Bus Connects were to conduct a proper survey of this from bus users in Palmerstown.

The NTA/Bus Connect has never explained and should be asked to explain why they wish to impose changes to the current route and for whose benefit these changes are intended for. There is no hospital in Palmerstown Village for which a bus stop in the village is essential – Stewart’s Hospital is a NOT a hospital but is a care facility. No evidence has been provided by NTA/Bus Connects for a need for such a bus route through the village which will result in significant disruption to traffic flows and movement in the Village and on the R148 to facilitate this new unnecessary route.

The advantage of using the existing bus stops on the R148 (Stops 2241 and 2242 on the north carriage and Stops 2201, 7239 and 4401 on the south carriage) for the No 80 (No 26) bus is that it offers maximum flexibility for the bus users from Palmerstown to choose from the C spine buses or the No 80 (No 26), especially during peak hours when buses can be full by the time they arrive in Palmerstown. Removing the No 80(No 26) bus from these stops will thus ADD to the journey time for bus users from Palmerstown during peak times, contrary to the objective of Bus Connects in reducing journey times for bus users.

The proposed new bus stops on the Lucan Road in Palmerstown Village are sufficiently close in distance to the existing bus stops on the R148 (Stops 2241 and 2242 in particular) and as such would not increase the number of bus users coming within its catchment area. In fact, the re-routed No 80(No 26) bus will actually see a DECREASE in the usage by residents in Palmerstown in favour of the C route buses if the No 80 (No 26) bus service is re-routed through Palmerstown Village.

Furthermore, the erection of a bus shelters outside the Cottages on the Lucan Road in Palmerstown Village for the proposed No 80 (No 26) bus route will significantly impact upon the street scape and is contrary to the designation of the Cottages and that part of the village and street scape as an area of architectural conservation.

The rerouting of the No 80 (No 26) bus into the village at the Oval/the R148 junction will also mean the cessation of a very important community event held in Palmerstown over the past number of years – “Mary’s Ceile at the Crossroads” which is held on the Lucan Road outside the St Finian’s Terrace and the Cottages and which road closure of the Lucan Road at this junction is an absolute requirement.

The journey time for the proposed new route for the No 80 (No 26) bus will be INCREASED having regard to all the traffic which previously went onto the Kennelsfort Road/R148 junction being diverted along the Lucan Road to the Oval/R148 junction due to the removal of the left turn from the Kennelsfort/R148 junction, and in the absence of a dedicated bus lane on the Lucan Road in Palmerstown.

The proposed new route for the No 80 (No 26) bus on the R148 westwards will also INCREASE the journey time for that service considerably, as the No 80 (No 26) bus heading west and travelling in the existing bus lane will have to cross two lanes of traffic to enter the proposed bus lane in the central median of the R148 to turn right at the traffic lights at the Oval/R148 junction into Palmerstown Village. During peak travel times these two lanes are severely congested with other vehicular traffic and it would be very difficult for a bus to move from the existing bus lane across two lanes of traffic in a timely manner. If the No 80(No 26) bus moves out from the bus lane and gets into the two outer lanes further back along the R148, then the bus will be stuck behind the other traffic approaching the Oval/R148 junction.

It is unclear whether the proposed removal of the Bus stop on the Drive (Stops 2201) forms part of the overall plan for the No 80 (No 26) bus entering into Palmerstown Village at The Oval/R148 junction. However the removal of this Stop 2201 will fundamentally contradict one of Bus Connects stated objective of increasing the number of people living or working within 400m of a bus stop. The removal of bus Stop 2201 on the Drive will actually DECREASE the number of people living within 400m of the bus stop by excluding a large number of houses on Palmerstown Drive, Cullmore Road, Glenaulin Road, Glenmaroon Road, and Wheatfield Road from its catchment. No reason has been advanced to exclude the bus stop which is of great importance especially to the users of the C route buses.

Finally, the removal of the No 18 bus route and its associated bus stops on the Old Lucan Road west of Lower Kennelsfort Road and on the Lower Kennelsfort Road, either independently or in conjunction with the plan to re-route the No 80 (No 26) bus through Palmerstown Village, will also DECREASE the number of people living within 400m of the bus stop by removing all the bus stops in Palmerstown Village west of Lower Kennelsfort Road. There are vulnerable people living in the Simon Community and John of Gods accommodation in the Village who rely on the No 18 bus and bus stops in that part of the Village. A significant number of houses in Palmerstown Village will also be directly affected by this and further contradicts the Bus Connects stated objective of increasing the number of people living or working within 400m of a bus stop. The proposed new bus stop on the Lucan Road in Palmerstown Village east of Lower Kennelsfort Road fails to address this in any meaningful way.

It is therefore submitted that the No 80(No 26) route should not change from the current route, and consideration should be given to retaining and/or enhancing the existing No 18 bus service as the bus serving the Village proper . It is also submitted that the removal of the bus stop 2201 on the R148 outside the Drive is also wholly unnecessary, and it is vital for the residents of Palmerstown that this bus stop is maintained.

3 Proposed Changes to road layout at The Oval/R148 Junction

NTA/Bus Connects propose to extend the bus lane west along the R148 all the way to the Oval/R148 junction and to remove the existing left turn laneway into the Oval at this junction.

It is proposed to maintain the left turn into the Oval at this junction (which is vital for the residents in that part of Palmerstown). The result is that vehicles on the R148 which intend to turn left into the Oval at this junction will be doing so from the middle lane of the R148, turning across the bus lane where taxis and buses could be travelling at speed even within the 60kmh speed limit, creating an unnecessary danger. Alternatively, a vehicle trying to turn left from the middle lane of the R148 into the Oval at this junction is likely to slow down the traffic travelling west on the R148 while waiting for traffic in the bus lane to pass and ensure that it is absolutely safe to drive across the bus lane to turn left into the Oval. It will also add to back up of the traffic on the R148 and will result in increasing the CO2 emissions of the extra traffic backed up on the R148.

NTA/Bus Connects propose to remove the left slip lane for traffic leaving the Oval and heading west along the R148. This is apparently to facilitate a new toucan crossing just west of the Oval/R148 junction and the removal of the existing pedestrian crossing just east of the Oval/R148 junction. It is submitted that the proposed toucan crossing at the west of this junction is incorrectly located and should not be moved from the location of the existing pedestrian crossing. Cyclists crossing from Palmerstown Village to the Oval using the proposed toucan crossing will be on their incorrect side of the road upon crossing and will be entering into a very busy junction and will have to alight and wait to cross the mouth of the junction at the Oval parallel to the R148. In the circumstances, the cyclists are likely to use the pavement as a short cut to get into the cell, and this will be wholly unsatisfactory as there are two schools located at the end of the Oval and school children use these pavements. It is submitted that it is also safer for cyclists to cross from the village to the Oval east of the junction as heretofore when they remain on their correct side of the road at all times.

Removing the left slip lane for traffic leaving the Oval will also cause a backlog in traffic leaving the Oval especially at peak hours and during school times. Increasing the length in the sequence for traffic leaving the Oval at the Oval/R148 junction will not be adequate to alleviate the traffic congestion unless the sequence is of such length which will then result in the disruption in the traffic flow on the main R148 road in both directions. The changes proposed for the Oval/R148 junction by removal of the existing pedestrian crossing and adding to traffic tailbacks existing the Oval will also adversely affect the Active Travel Schools Project supported by the Council for the two schools at the end of the Oval. Increased congestion caused by traffic will not enhance the safety of school children walking and cycling at the Oval and within the cell the Oval.

It is proposed to create a bus lane of no more than 30m or thereabouts entering Palmerstown Village at the Oval/R148 junction from the R148. This is totally unnecessary as there is no scope for ever extending this bus lane further as the road beyond it will be used by vehicles exiting Shaw's Trees Services to turn into the Village. It is unsafe to open this junction to buses entering the Village from the R148. The vehicles entering and exiting Shaw's Tree Services at that location have to stop on the roadway to open or close the gates to the said premises. This will present an obstruction and hazard for buses turning right into the Village at the Oval/R148 junction to encounter a large vehicle stopped ahead, and this may be a regular occurrence.

The consequence of having a toucan crossing at the western side of the Oval/R148 junction is that pedestrians and cyclists crossing the R148 from the Oval to the Village will enter the Village at the same side as the entrance to Shaw's Tree Services. There is no pavement at that side of the road as it currently exists, but it is highly questionable whether it is safe to construct a pavement for pedestrians immediately outside Shaws Tree Services. A pavement for

pedestrian already exists on the opposite of the road at a safer location. Pedestrians on the same side as Shaw's business will have to contend with large vehicles coming in and out of the premises and stopped outside the premises forcing pedestrians to walk onto the road itself. A similar problem will be faced by cyclists if they cross at the proposed the toucan lights and are permitted to enter the Village at the Oval/R148 junction using the bus lane. It is submitted that the toucan crossing should NOT be located where the NTA/Bus Connects have proposed at the western side of the Oval/R148 junction, but that the existing pedestrian crossing to the east of the Oval/R148 junction should be retained.

Furthermore, there is almost a 90 degree turn in the road after Shaw's Tree Services into the Village. It is submitted that it is not physically possible for bus to take that corner without partially crossing onto the incorrect side of the road (and even into the proposed two lane cycleway on the Lucan Road at that point. In short, the NTA/Bus Connects proposal of having a bus service entering the Village at the Oval/R148 junction with all the associated works on the R148 and in the immediate area required to support it, is wholly impractical.

4 Proposed Changes to road layout at the Kennelsfort Road/R148 Junction

It is wholly unnecessary to remove the existing left slip road from Kennelsfort Road Upper onto the R148 at the Kennelsfort Road/R148 junction. The slip road should be maintained for traffic turning left at the junction from Kennelsfort Road Upper. At the very least, traffic turning left from Kennelsfort Road Upper onto the R148 and heading west should still have a left filter light with a separate sequence from the traffic heading straight towards the Village or turning right towards the city centre, as is the case now.

The NTA/Bus Connects have proposed a two way cycleway and toucan crossing, on the east of the Kennelsfort Road/R148 Junction. There is already a pedestrian overhead pass at this exact location, which cost a lot of money to build and is used by pedestrians on a regular basis. The proposed toucan/pedestrian crossing on the R148 Road is therefore a complete waste of money as it is a duplication of functions.

While cyclists cannot use the existing overhead pedestrian crossing without having to dismount, and may require a cycle crossing across the R148, it is submitted that the proposed two lane cycleway and toucan crossing (even if it is reduced to a cycle crossing only), is not properly thought out. This proposed two lane cycleway extends as far as the pedestrian crossing at Kennelsfort Road Upper. Cyclists travelling down Kennelsfort Road Upper are expected to dismount and wait for the pedestrian lights on Kennelsfort Road to change before being able to get onto the two lane cycleway to cross the R148 at the proposed toucan crossing. There is no joined up thinking here as there is no scope to have a continuous two way cycleway along Kennelsfort Road Upper. Single cycle lanes will be maintained and enhanced along the side of Kennelsfort Road in the long term. As such, there is no need to have a two way cycle lane for this short stretch of roadway as proposed by the NTA/Bus Connects. The disruption caused to the other traffic movements into and out of Palmerstown Village will outweigh any possible benefits of this proposed short two way cycle lane and associated toucan crossing.

It is not necessary to prohibit vehicles from turning left out of Palmerstown Village at the Kennelsfort Road/R148 junction. The removal of the no left turn will only cause a buildup of traffic leaving the village at the only other exit for Palmerstown Village at the Oval/R148 junction. It would be preferable to spread the traffic load between these two junctions. The

buildup of traffic trying to exit the Village as a result of the proposed changes at the Kennelsfort Road/R148 junction will result in an increase in CO2 emissions.

5 Environmental Impact on the Proposals and associated Works

Briefly, we wish to point out the following:

There is well established badger set on the embankment west of the Oval/R148 junction where it is proposed to store the machinery for the works and where some ancillary works could take place. The legislation and regulations concerning the protection of badgers and the removal of badger sets must be complied with in full before any works can progress.

There is one for the largest bat colonies on the island of Ireland located at Stewart's Hospital and Waterstown Park. The feeding areas for these bats extend to the beech trees on the embankment where it is proposed to store the machinery for the works. To facilitate the storage of machinery, NTA/Bus Connects have proposed that the beech trees be removed. This would affect the feeding grounds for the bats, and it is submitted that all the beech trees should be preserved and the embankment area should not be used as storage area for machinery at any time.

It is further submitted that a full environmental impact study should be carried out before approval is given for the commencement of any of the proposed works.

]

6 Conclusion

The community of Palmerstown have suffered significantly over the years when "the Chapelizod Bypass" (R148) was routed through Palmerstown back in the 1980s, resulting in the separation of Palmerstown Village from the rest of Palmerstown situated across "the Chapelizod Bypass" (R148).

For many years, a free flow junction was promised at the Kennelsfort Road/R148 junction to alleviate the hardship inflicted on the community of Palmerstown as a result of the bypass splitting Palmerstown in two. Nothing ever came of this and it would appear that any plans to build such a free flow junction were effectively abandoned some time ago. The Palmerstown community remains divided by the R148.

As such, the R148 should be viewed as road with special importance locally within Palmerstown and which is intended to serve and address the needs of the community of Palmerstown. The R148 remains a vital link between Palmerstown Village and Palmerstown across the R148. Thus, any vehicular access into the Village from the Oval and Kennelsfort Road Upper and from the Village into the Oval and Kennelsfort Road Upper should be facilitated as much as possible and not restricted any further. The proposals to remove the left slip lane from The Oval towards the Kennelsfort Road/R148 junction, to eliminate the left hand turn from the Village towards the Oval/R148 junction, should be refused as being detrimental to the community of Palmerstown.

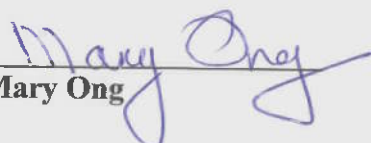
It is about time that the needs of the community of Palmerstown were addressed after years of being neglected. One of the NTA/Bus Connects aims are to connect communities across the

city and country. If implemented in full, these proposals by the NTA/Bus Connects will only serve to destroy the community of Palmerstown, and will further cut off Palmerstown Village from Palmerstown situate across the R148 from Palmerstown Village, and vice versa.

DATED: 8TH JANUARY 2023.

Signed: _____

Mary Ong



Signed: _____

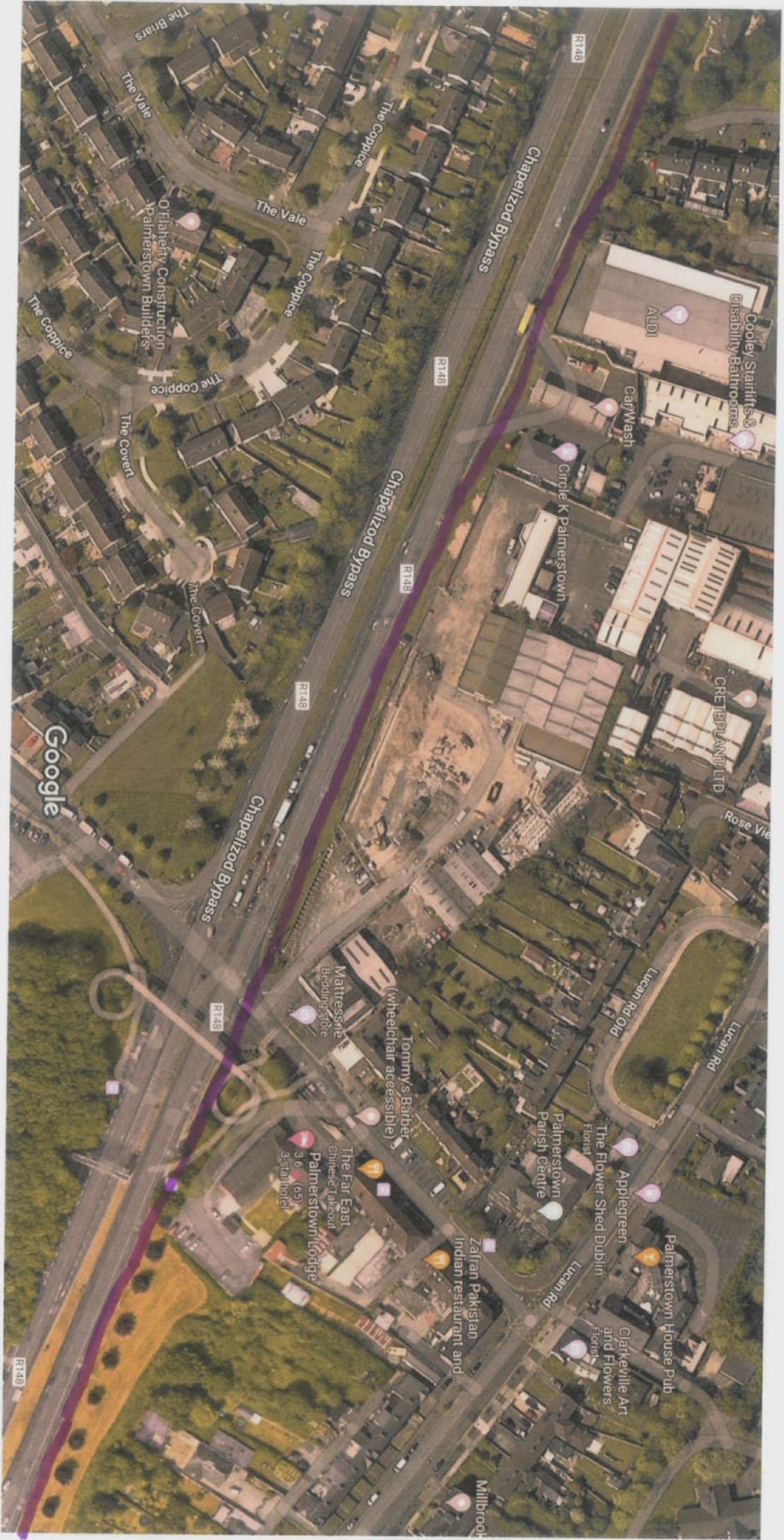
David Ong





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Proposed Alternative Route (Cypruswry)



Imagery ©2023 CNES / Airbus, Infoterra Ltd & Bluesky, Maxar Technologies, Map data ©2023 20 m

Proposed Alternative Route (Cycleway)

<https://www.google.ie/maps/@53.3556157,-6.3734459,268m/data=!3m1!1e3?hl=en-GB>

Google Maps



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Proposed Alternative Route (Cycleway)

<https://www.google.ie/maps/@53.3544855,-6.3681566,268m/data=!3m1!1e3?hl=en-GB>