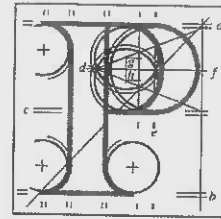


Our Case Number: ABP-314942-22



An
Bord
Pleanála

Siobhan Garcia
Palmerston Community School
Manor Rd,
Palmerstown
Dublin 20

Date: 8th February 2023

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

Dear 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

| | | |
|--------------------|---------|------------------|
| Tel | Tel | (01) 858 8100 |
| Glaó Áitiúil | LoCall | 1800 275 175 |
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| Láithreán Gréasáin | Website | www.pleanala.ie |
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| | |
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| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1 | Dublin 1 |
| D01 V902 | D01 V902 |

PALMERSTOWN COMMUNITY COUNCIL CLG

c/o 24, Manor Road, Palmerstown, Dublin 20

An Bord Pleanála,
62 Marlborough Street,
Dublin 1.
A Chara,

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| ORD PLEANÁLA | |
| 260373-23 | |
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| 11 JAN 2023 | |
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| Time: 10.23 | By: hand |

LUCAN TO DUBLIN CITY CENTRE CORE BUS CORRIDOR SCHEME

I, Siobhan Garcia, write in my capacity as Chairperson of Palmerstown Community Council CLG. Palmerstown Community Council has been in existence since 1970 and as a Community Council is recognised as a fair and impartial promoter of good community dialogue internally and as an independent negotiator externally..

On behalf of the members of Palmerstown Community Council and on behalf of the many residents of the Palmerstown Community who have contacted me or a member of the Community Council I wish to make a number of observations and recommendations on the proposed Lucan to Dublin City Centre Bus Corridor.

1.GENERAL OBSERVATIONS AND COMMENTS. Palmerstown Community is supportive of both Busconnects and the NTA programme for improvement of public transport and especially bus services in Dublin and in addressing climate change. Palmerstown is lucky to have the C spine passing through our community and in addition to be served by the 26 and the 18 services.

Sadly, the road infrastructure on the Palmerstown Bypass/R148, and especially at the Kennelsfort Road and Oval junction are designed very poorly and neither serve the community of Palmerstown or the Bus network. The declared intention of Busconnects to build a network of continuous bus priority and safe cycling facilities along the Lucan City corridor to provide a more efficient bus network with high frequency spines, new orbital routes, and increased bus services that are more user-friendly and convenient, is to be welcomed.

It is regretful that there is very little evidence in the Lucan to City Scheme Environmental Impact Assessment Report (EIAS) that local conditions or experience have been considered.

In particular Palmerstown Community Council is very disappointed to find that the main issue for traffic and buses, namely the Kennelsfort Road Junction and the communities demand for an underpass at this location has been ignored. This is difficult to understand given that the R148/Palmerstown Bypass is one of the arteries to and from Dublin City,. The proposals now put forward by Busconnects for both these junctions are unworkable as we will show later on. .

Similarly, Palmerstown Community Council is very disheartened at the proposal to discontinue the 18 Bus route which has established for itself a very strong patronage. Secondly, the proposal to divert the 26 service through the Village in both directions is disastrous. . There is no demand for this change in service. It removes a vital link or connection with the Buses on the C spine as well as severing the long-established links with the Chapelized community. .

Palmerstown Community Council want to put it on record that we will judge the final Lucan to City Centre BusConnects Scheme on how it passes through Palmerstown and how it serves the Community of

Palmerstown and the degree in which it corrects past bad planning and to which it does not unduly interfere with or undermine the environment or community integrity.

Palmerstown Community Council is of the opinion that for the foreseeable future or until we have developed a reliable and efficient Public Transport Service, private cars should be accommodated and facilitated where possible. Some of the proposals in the current Lucan to City Scheme unduly penalise the private motorist and should be removed.

Most of the traffic that uses the R148 does not originate or seek to access the Palmerstown 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 on a regular basis with traffic being stacked up from the West from early morning, and from the City from about 3.30pm daily. The resultant air and noise pollution is unwarranted and intolerable. 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 be for the better and not make the present situation worse.

2.KENNELSFORT ROAD and THE OVAL JUNCTIONS The current proposals for both these junctions are not acceptable and will not facilitate either the Bus service or the public. 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 road areas without in any way facilitating the Bus services. The slip lane here should be retained and synchronised with the arrow controlling traffic entering 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 Village area.

Any reconfiguring of the Kennelsfort Road junction should improve traffic flow and reconnect the two sides of the Palmerstown Community. Palmerstown Community Council request that An Bord Pleanala seriously consider the need for a segregated junction at this location.

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 man hours sitting in traffic and significantly contribute to a much cleaner environment. The proposed modifications of the Kennelsfort Road and Oval junctions will be surplus and the Lucan to Dublin Bus Scheme will be a success.

ALL traffic. Including Buses on the R148 outbound must travel at a speed that recognises that they are travelling through a residential area and entering an area where traffic is weaving so as 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.

The slip lanes at both Kennelsfort Road and the Oval should be retained until such time as an underpass is in place.

The proposal to allow (on the R148 outward carriageway) a right-hand turn and open a new dedicated Bus Lane at the Oval to the Old Lucan Road 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 Oval right back to the Con Colbert Road between 4.00pm and 7.00pm most days. It will also result in additional traffic and congestion on the Old Lucan Road and Village area without any gain to the

residents. 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. The proposed right turn 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. The current access to the Bus Lane should be retained or the middle lane should become the through Bus lane leaving the inside left lane for vehicles turning left.

3. PEDESTRIAN AND CYCLE ROAD CROSSING OF THE R148. The present arrangements, a bridge at Kennelsfort Road over the R148 and a surface crossing further along at the Oval do not make sense. Neither is the proposal for two Toucan crossings sustainable. They will not create a safe crossing at either location and will 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. In 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.

4. CYCLEWAYS The proposed cycleway through the Old Lucan Road cannot be justified in terms of community infrastructure or in financial terms. The view of the Palmerstown community is that this relocation of the 26 Bus is a waste of public money. The Old Lucan Road west 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, the road 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 by patron of the Churches.

There is an alternative which is more practical and will be cheaper to build. It can link the cycleway as it emerges from the bridge over the M50 with the cycleway coming from the City and Chapelizod at the Oval. All that is necessary 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 residential estates at the Oval. On the way it links 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 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 at Kennelsfort Road Lower. The current bus stops and terminus on the Old Lucan Road should be retained. There is huge local support for this service.

On the other hand, there is no demand, expressed wish or welcome locally for the proposed (26/80) bus service into and through the East Old Lucan Road/Palmerstown Village Area. The diverted service disenfranchises people from the Oval and inner roads who will lose current access to the 26/80 unless they travel the additional distance to the Old Lucan Road. This is contrary to the intention to make Bus services available and readily accessible to all within a given radius.

The current service (26) provides a vital link with the 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 doctor's and other services in the other area. The removal of the 26/80 from the R148 bus stops in both directions will disenfranchise a large proportion of the Palmerstown Community and those further afield. This is because 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 Village area while the feedback from the Village is that people would prefer to walk to the R148 given the regularity and choice of buses.

Residents in the Village, including the new Apartments at Palmerstown Gate, have and will 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 access all other buses on the R148.

In addition, the proposal to operate (26/80) Bus service through Lower Kennelsfort Road and turn right to travel East along the Old Lucan Road will add to the traffic chaos given that all traffic from the other end of the Old Lucan Road, estates off it, lower Kennelsfort Road including people from Palmerstown Gate Apartments and proposed Hotel will have to travel the additional journey to the proposed (only) exit leading left to the City at the Oval. All of this brings a huge amount of additional traffic 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. It has already been accepted that residents of Red Cow and Woodfarm Cottages do not have facilities for off street parking. 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.

Even more serious is the proposal for a Bus stop in front of Nos 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). A full description, including the significance of the original iron railings is to be found in the Plan. A Bus stop with raised platform and Bus Shelter as proposed would totally disfigure this unique streetscape. 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.

We have already covered, at 2 above, the junction and traffic implications at the Oval 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 entered the operational phase.

It has to be noted that if some real planning had gone into driving the 26/80 service into Palmerstown Village, the alternative and sensible route would have been to open the part of the Old Lucan Road that extends to Chapelizod for Buses only 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 between the Old Lucan Road and Chapelizod.

It is strongly recommended that the proposal to build infrastructure for a (diverted) bus route through the Old Lucan Road and Palmerstown Village be removed from the Lucan to City Scheme. It is costly, impractical and not fit for purpose.

5, BUS STOPS Two Bus stops each on the City bound direction and on the return journey would support a good bus service on the R148. The proposed location for a relocated Bus stop 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 do not have to cross the service road to the old Lucan Road to get to be Bus. There is adequate green space at the City end 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 Estates. On the other hand, the one at the Oval is close to the one at Kennelsfort Road (no one 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. Instead the Palmerstown Drive Bus Stop should be relocated and recessed at the green space midway between the current location and the Oval junction thus incorporating both stops.

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 in the above piece of "research" is the fact that this is traditional swamp land and has been undisturbed for over 30 years. Local knowledge points out that 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. 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 mounded 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 at the Oval. In any case, these will not be required if the suggestions on the diverting of the 26/80 and cycleway

are taken on headed and if the proposals put forward by Palmerstown Community Council and others re the segregated junction are taken on board by An Bord Pleanala.

7. SUMMARY

- It is Palmerstown Community Council view that the Lucan to City Centre Scheme does not deliver on the objectives outlined in the General Overview 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, Palmerstown Community Council is asking that it be rejected by An Bord Pleanala.

I submit the €50 fee.

Yours truly,



SIOBHAN GARCIA

HON CHAIRPERSON, PALMERSTOWN COMMUNITY COUNCIL CLG

10th January 2023

Registration Number: 297817;

Registered Office: 47, Palmerstown Green, Palmerstown, Dublin 20, Ireland;

Business Address: 24, Manor Road., Palmerstown, Dublin 20, Ireland;

Company Secretary: Augustine O'Connell;

Directors: Patrick Lynch, Augustine O'Connell, Jean Harrington, Frank McKenna, Patricia O'Brien and Stephen Dunne.

Executive Members Chairperson: Siobhain Garcia; Vice-Chairpersons: Johnny O'Brien and Marion Reid, Secretary: Irene Nugent, Minutes secretary; Irene Nugent Joint Treasurers: Francesa Murray and Marion Reid and PRO: Adrian Dempsey.