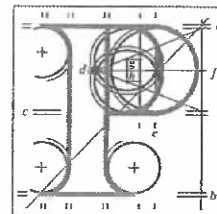


**Our Case Number:** ABP-314942-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Riversdale Riverview Old Lucan Road Resident's Group  
c/o 6A Shane King  
6A Robin Villas  
Palmerstown  
Dublin 20

**Date:** 17 January 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

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
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<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
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64 Sráid Maoibhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Riversdale Riverview Old Lucan Road  
Resident's Group  
C/o 6A Robin Villas  
Palmerstown  
Dublin 20

6<sup>th</sup> January 2023

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

**Re: Bus Connects – Lucan to City Centre Core Bus Corridor Scheme  
– Palmerstown Village**

Dear Board,

We refer to the above scheme and to our letters to the National Transport Authority, dated 7<sup>th</sup> December 2020 and 8<sup>th</sup> January 2021, regarding the above.

We represent residents of Palmerstown Village. While we support the objectives of the Busconnects project, the proposed new bus route through Palmerstown Village, the proposed works and some of the related traffic management measures do not fulfil those objectives and they do not constitute proper planning or sustainable development for Palmerstown Village

We have set out below our submission in relation to the proposal by the National Transport Authority ("NTA").

Yours Sincerely,

---

Shane King  
Chairman

## Riversdale, Riverview, Old Lucan Road Resident's Group –

### 1. Introduction

- 1.1. We represent residents of Palmerstown Village.
- 1.2. We agree with the objectives of the BusConnects programme and that they can benefit residents in Palmerstown Village, however we believe that there has been a fundamental misunderstanding, by those who have drafted the plans for Palmerstown Village, as to the nature of Palmerstown Village and the public realm that it provides.
- 1.3. What is proposed contravenes some of the NTA objectives, most notably:
- 1.3.1. *“Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable”* (the proposal for the segregated cycleway is not practicable);
  - 1.3.2. *“Support the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland’s emission reduction targets”* (Route 80 is unnecessary and increases the carbon footprint of Palmerstown Village)
  - 1.3.3. *“Ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible”* (current proposals make Palmerstown Village more transient and erodes the Village Centre status)  
(our emphasis)
- 1.4. We have set out below the problems with the proposals and, taking account of the NTA objectives, the possible solutions.

### 2. Background

- 2.1. The R148 Chapelizod Bypass (and M50) was constructed between 1985 and 1990, splitting Palmerstown in two. The R148 (N4) dissected Palmerstown, leaving Palmerstown Village to the north of the R148 and the M50 created a cul-de-sac of the Old Lucan Road in the village.
- 2.2. Palmerstown Village is zoned industrial, mixed commercial, residential and amenity. There are approximately 319 residences in Palmerstown Village at present. The result of the above has

been the concentration of residential, amenity, commercial and industrial areas in a landlocked area which places strain on the limited transport and traffic infrastructure in Palmerstown Village. For this reason the village requires the careful management of its infrastructure by residential, commercial and public body consultation.

2.3. Palmerstown Village does not require further dissection by way of the introduction of Route 80, nor, as explained below, the unnecessary imposition of the segregated cycleway through the village.

2.4. The SDCC Development Plan 2016-2022 has zoned Palmerstown Village as a "Village Centre" supported by the following objectives;

2.4.1. UC3 Objective 1 states "To protect and conserve the special character of the historic core of the traditional villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of the villages informs the design approach to new development and renewal, in particular in Architectural Conservation Areas (ACAs)"

2.4.2. UC3 Objective 2 states: "To promote design standards and densities in traditional village centres, that are informed by the surrounding village and historic context and enhance the specific characteristics of each town or village in terms of design, scale and external finishes".

2.4.3. UC3 Obj. 4: "To continue to improve the environment and public realm of village centres in terms of environmental quality, urban design, safety, identity and image."

2.5. As explained further below, the SDCC objectives for Village Centres, including objectives 1, 2 and 4 in particular, are not met by the plans for Route 80 or the segregated cycleway in Palmerstown Village.

2.6. Equally, the overarching Transport and Mobility objective 3 that is relied on, namely "To focus on improvements to the local road and street network that will better utilise existing road space and encourage a transition towards more sustainable modes of transport, while also ensuring sufficient road capacity exists for the residual proportion of the trips which will continue to be taken by private vehicle." And Objective 5 "To balance the needs of road users and the local community with the need to support the development of a sustainable transportation network." are contravened by the restriction on traffic flow at the St. Fintan's Terrace Junction and by the extent of the removal of on-street parking.

2.7. We note that the NTA mentions that the SDCC transport objectives *"These objectives result in SDCC identifying a number of actions outlined below: Work with the NTA to secure the extension and expansion of the Core Bus Network and other bus services to serve new areas of employment, housing and tourism potential, whilst also improving the efficiency and frequency of services within more established areas. Identify opportunities for multi-modal interchange and transport hubs at key locations (such as Centres, cross cutting infrastructure) to **increase the efficiency and flow of public transport services**".* For the reason outlined at 4.1 below, there is no need for a bus Route 80 in Palmerstown Village and it does not increase efficiency and flow of public transport services.

2.8. **Vincent Byrne Site - In September 2020**, An Bord Pleanála granted planning permission to Randleswood Holdings Limited to construct 250 residences in the form of 'build to rent' apartments at the 'Vincent Byrne Site' at the junction of the Kennelsfort Road Lower and the R148 (ABP Ref: 307092-20). As part of the planning application, AECOM Ireland Limited stated *"It is AECOM's considered opinion that there is no traffic or transportation reason why this development should not proceed."* That statement was wholly incorrect as explained by the Technical Note submitted by us in relation to that planning process. The Technical Note also raises significant concerns regarding the cumulative effect of the development and BusConnects on Palmerstown Village – which are explained below.

2.9.53 **Bedroom Hotel Site – On 14<sup>th</sup> December 2020**, An Bord Pleanála issued its decision to grant planning permission for a 53-bed hotel. The site is located on the east side of Kennelsfort Road Lower and direct access is proposed from Kennelsfort Road Lower (ABP Ref: 307596 - 20). That development is situated directly across the road from the main access point to the Vincent Byrne Site and will directly affect the traffic flow into and out of Palmerstown Village including the proposed segregated cycleway.

Please note that the ABP inspector recommended that the hotel development should not be granted planning permission.

### **3. Number 80 Bus Route and infrastructure**

#### **3.1. Bus Route - General**

3.1.1. The first and second public consultations by the NTA on the radial bus routes identified a route 14 bus route that (westbound) would not turn into Palmerstown Village from the R148 but instead turn left off the R148 and up Kennelsfort Road Upper. This changed in 2019

and the proposed Route 80 into the village was created. The reasoning for this is not clear.

- 3.1.2. The Report on the 2018 Public Consultation, in relation to the Ballyfermot Catchment Consultation Area, stated under General Observations, *“Access to Hospitals - **Stewart’s Hospital Palmerstown** was the most frequently referenced hospital. Our Lady’s Children’s Hospital and Tallaght Hospital were also referenced by a number of respondents”*. Specific Observations stated were *“Loss of Direct Services to Hospitals. Ballyfermot is currently well connected to hospitals at Tallaght, St. Vincent’s, Crumlin and **Stewart’s**. A number of submissions noted that these journeys would now require interchange.”* (our emphasis)
- 3.1.3. Section 7.2.2 of the Draft Preferred Route Options Report November 2020 also states *“The R148 signalised junction with the Old Lucan Road/the Oval a new westbound, bus only, right turn lane is provided on the R148 to facilitate bus services serving Palmerstown Village. An additional strip of land acquisition will be required from the western edge of the petrol filling station at this location to accommodate this new bus movement which was not included in the EPR Option. In addition, new bus stops are provided on the Old Lucan Road to serve Mill Lane/**Stewarts Hospital**.”*
- 3.1.4. Please note that there is no “Stewart’s Hospital” and nor is there “Stewart’s”. This term is misleading. There is no hospital in Palmerstown Village.
- 3.1.5. Stewarts Care Limited owns properties in Palmerstown Village on which it provides day care and residential services to people with special needs. 99% of the client’s of Stewarts Care Limited who either live on the property or attend the property daily arrive there by private transport. They are not capable of travelling independently on public transport. 95% of employees and independent contractors of Stewarts Care Limited who attend the properties in Palmerstown Village travel by car, notwithstanding that the existing number 18 bus route and the C spine routes, serve Palmerstown Village.
- 3.1.6. The reasoning for the introduction of Route 80 to Palmerstown Village is therefore fundamentally flawed and the Board must review this.
- 3.1.7. In terms of demand, there is no demand to justify running the Route 80 into the village. There are 11 houses on Mill Lane and as explained above there is no demand from users of Stewart’s Care Limited properties. The NTA has contracted the Route 18 bus service to GoAhead Transport Services (Dublin) Limited, so it has a contractual entitlement to the passenger numbers. The Board

should therefore be aware of the lack of demand for the proposed radial bus service in Palmerstown Village. The radial route can be availed of on Kennelsfort Road Upper.

3.1.8. In terms of representations, we understand that neither residents of Palmerstown Village nor Stewarts Care Limited made representations to the NTA regarding the running of a bus route into Palmerstown Village as is proposed for the Route 80. The question remains as to who wants Route 80?

3.1.9. By introducing a bus route to Palmerstown Village that is unnecessary and in relation to which there are alternatives only metres away on the R148, the Route 80 proposal is not only disproportionate to the end to be achieved but it is contrary to (a) the BusConnects objective to “*Support the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland’s emission reduction targets*” and (b) SDCC Development Plan.UC3 Obj. 4.

3.1.11. The GDA Cycle Network Plan adopted in 2014 states at 3.5.2 “*Dublin West - Proposals for Cycle Route Network Additions: In the Dublin West sector new cycling facilities are required to complete the cycle route network at Primary and Secondary Route levels at the following locations: (a) Radial Route 6 along Palmerstown Village, Stewart’s Hospital, and through Chapelizod Village*”. Please note again the incorrect reference to “Stewart’s Hospital”, as explained above, and please note that the property north from St. Fintan’s Terrace is owned by Stewarts Care Limited and it is within (and not distinct from) Palmerstown Village.

### **3.2. Bus Route and infrastructure - Air Quality at Palmerstown**

3.2.1. The Urban air quality modelling of Dublin 2019 prepared for the EPA, at Figure 8.1: Modelled annual average NO<sub>2</sub> concentrations for 2015 ( $\mu\text{g}/\text{m}^3$ ) demonstrates that the Kennelsfort Road Lower junction and the Oval junction on the R148 the **Annual Ave NO<sub>2</sub> ( $\mu\text{g}/\text{m}^3$ ) is 40-45  $\mu\text{g}/\text{m}^3$ . The EU NO<sub>2</sub> annual limit value is 40 $\mu\text{g}/\text{m}^3$ . The M50 which abounds the Old Lucan Road at the western end of Palmerstown Village is 60- 100 $\mu\text{g}/\text{m}^3$ .**

3.2.2. Palmerstown Village is hemmed in by extremely high NO<sub>2</sub> levels. The BusConnects Core Corridor 6 along the R148 should certainly not increase the NO<sub>2</sub> levels of areas that are the subject of the core bus corridor 6, namely Palmerstown Village. The Old Lucan Road in Palmerstown Village is currently under 28 NO<sub>2</sub> ( $\mu\text{g}/\text{m}^3$ ). If the bus Route 80 operates into the Old Lucan Road that will only contribute to the rise in NO<sub>2</sub> levels within the village.



3.2.3. The EPA in its report entitled "Air Quality in Ireland 2019" (published on 25/09/20) noted that "there was an exceedance of the EU Air Quality limit value for nitrogen dioxide in Dublin. The exceedance was at the St. John's Road West station. An annual average concentration of 43 µg/m<sup>3</sup> was measured in 2019. This is above the EU annual limit value for NO<sub>2</sub> of 40 µg/m<sup>3</sup>. This exceedance of an air pollution standard is as a result of the heavy traffic passing this monitoring station." That heavy traffic runs along the R148 each day.

3.2.4. Sending Route 80 into Palmerstown Village conflicts with the objective of BusConnects, namely "the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets."

#### 4. Alternative

6

4.1. On the R148 at present there is bus infrastructure with two bus stops on each side of the carriageway (which are less than 100 metres from the proposed Route 80 bus stops on the Old Lucan Road). Both sides of the carriageway are linked by a light controlled crossing and a pedestrian median. These can easily accommodate any users of Stewarts Care Limited premises or occupants of Mill Lane. Likewise, the location of the proposed bus stops on the R148 will reduce the walking distance for users of Mill Lane and Stewarts Care Limited premises.

#### 5. Bus Route Infrastructure

5.1. Notwithstanding that the proposal for Bus Route 80 is fundamentally flawed and should not proceed, our comments on the proposed route and infrastructure are as follows:

#### 5.2. Junction of Old Lucan Road and R148 (the "St. Fintan's Terrace Junction")

5.2.1. This junction (*please see page 33 of the Junction Design Report*) is going to be reduced to one outbound lane. This is going to create significant traffic problems for Palmerstown Village when combined with:

- the development at the Vincent Byrne Site, the 53 Bedroom Hotel and future development, as stated in Sections 1.6, 5.2.4, 5.2.16, 5.2.20, 5.2.21 of the Technical Note in Appendix 3 attached; and

- the BusConnects proposal to ban a left turn onto the R148 from Kennelsfort Road Lower.

5.2.2. This will contravene the SDCC objectives listed at 2.4.3, 2.6 and 2.7 above.

5.2.3. On 26<sup>th</sup> November 2020 we emailed the NTA with queries regarding this junction, namely:

*“On page 81 of the Lucan-City Centre Draft Preferred Route Option Report November 2020, the plan identifies where the proposed Route 80 bus (westbound) will turn off the R148 and into Palmerstown Village. Can the NTA clarify if the traffic exiting Palmerstown Village onto the R148 at that junction, will be able to travel citybound, straight across the R148 to Palmerstown on the Southside of the R148 and westbound towards the M50?”*

*Can the NTA clarify how and when the bus on the proposed Route 80 will enter Palmerstown Village and how this will interact with the timing of vehicles exiting from Palmerstown Village and vehicles exiting from Palmerstown on the southside of the R148?*

*Can you please also confirm if the amount of time that vehicles will have to exit Palmerstown Village onto the R148 at this junction, will be the same or greater than is presently the case?”*

We did not receive any replies to the above queries.

5.2.4. A bus is unlikely to be able to make the left 90 degree turn on Old Lucan Road without encroaching onto the far side of the road. Please see our Figure 1 below.

5.2.5. The Board should request from the NTA a swept path of a bus making the left hand turn at Old Lucan Road – please refer to the below for details. Please see our Figure 1 below.

5.2.6. The Board should request an explanation from the NTA as to how it knows that vehicles will not queue back to the bend thus impeding the bus from making the left hand 90-degree turn. Please see our Figure 1 below.

5.2.7. Buses making the left-hand turn at the St. Fintan’s Terrace Junction are likely to push outbound car traffic over the proposed segregated cycleway. There was no segregated cycleway at this point in the Maps 15 in the Draft Preferred Route Options Report March 2020, and yet what was proposed in the November 2020 document and what is now proposed includes no change of width of

the roadway and the introduction of the segregated cycleway. Please see our Figure 1 below.

5.2.8. When outbound traffic is backed up from the junction any inbound bus will not be able to make the left turn. That bus will block the exit of the commercial property, Shaw Tree Services, and this will give rise to an ongoing risk of exposure to liability and legal challenge.

5.2.9. The raised platform in place at the east-side of St. Fintan's Terrace facilitates the crossing of pedestrians to greater Palmerstown (the Oval/Palmerstown Credit Union, Butchers, Grocers, Hairdressers, Confectionary Stores etc). In particular, it facilitates the protection of school children walking to school from Palmerstown Village to St. Lorcan's School and St. Bridget's School at the Oval. Running two way traffic, including a bus, through that point gives rise to a considerable vehicle/pedestrian risk.

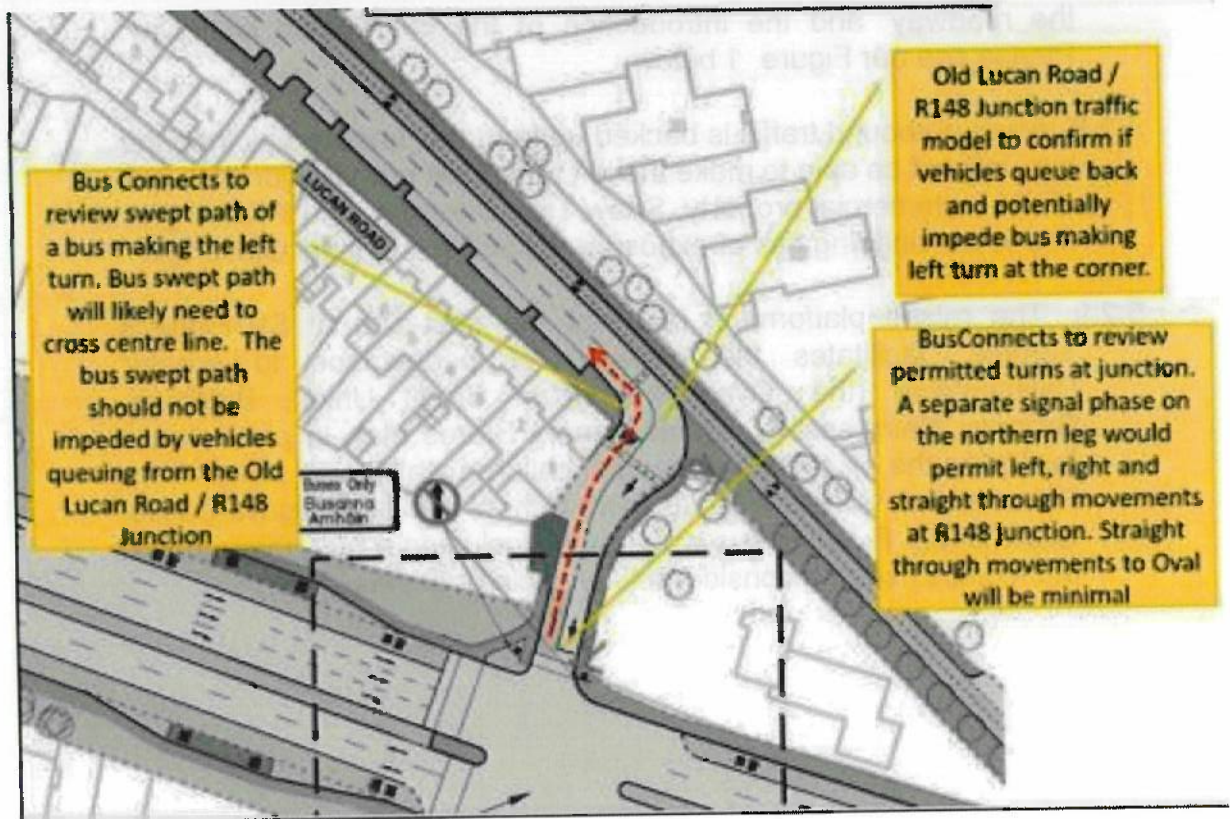


Fig.1

5.2.10. The Board should kindly request the NTA to confirm the permitted turning movements on the northern approach to the St. Fintan's Terrace Junction.

5.2.11. A separate signal phase would allow left, right and straight through (minimal expected) movements on the northern approach leg.

### 5.3. Parking and Bus Shelter at Red Cow Cottages

5.3.1 In relation to the revised layout of car parking spaces at Red Cow Cottages, these do not represent proper planning because the proposed new parking bays would not leave sufficient carriage way for commercial trucks (40ft) leaving Mill Lane, from Sun Chemicals and Stanlee Steel Services, turning right out onto the Old Lucan Road. Currently commercial vehicles barely have sufficient space to make this turn with the current parallel parking layout. The Board should request a swept path analysis from the NTA.

5.3.3. We object entirely to any construction of a bus shelter at this location. A bus shelter will corrode the streetscape and would be contrary to the BusConnects objective at 1.3.3 and the SDCC Development Plan objectives at 2.4.1, 2.4.2 and 2.4.3 above. Please see the streetscape of the northside and southside at this location, below.



*(The above photos were taken in November 2020. The motorcycle group of 100+ bikes attend at this location each year to support residents and to fundraise for Stewart's Care Limited. Other events at this location include the annual Ceili at the Crossroads and the St. Patricks Day Parade for clients of Stewart's Care Limited – both involving several hundred residents and clients of Stewart's Care Limited. The photo below is the Ceili at the Crossroads (an annual event) at St. Fintan's Terrace in September 2018.)*



5.3.4. Palmerstown Village has Village Centre status in the SDCC Development Plan and as such should be regarded as a key urban focal point.

5.3.5. If the segregated cycleway does not run from the Old Lucan Road and Kennelsfort Road Lower junction to the St. Fintan's Terrace Junction then there is no need for a bus shelter.

5.3.6. The disabled parking space east of that location outside 8 Red Cow Cottages is not required because it displaces the parking space of the residents at 8 Red Cow Cottages who have no off-street parking option. **An alternative** is that it can be located to the rear of the Coachhouse Café/Restaurant that is owned and operated by Stewarts Care Limited. In addition, there are two disabled spaces located outside the "Jazzhub" building 50 metres west on the Old Lucan Road.

#### 5.4 R148 and Oval Junction

The blocking of car movements (going westbound along the R148) into the Oval is not proper planning because it (1) will put added strain on the Kennelsfort Road junction and create traffic delays onto the N4 (2) it will create a risk to pedestrians as cars will speed through streets perpendicular to Kennelsfort Road Upper in an effort to get to the Oval and the surrounding (entirely) residential area and (3) it will also push traffic into Palmerstown Village via the Old Lucan Road junction and Kennelsfort Road Lower where the proposed new Route 80 bus will go. Cars will try to u-turn there and add to ongoing traffic difficulties as described below.

### 6. Segregated Cycleway

## 6.1.General

6.1.1. In the draft route documents proffered by BusConnects, including the Draft Preferred Route Options Report March 2020, the segregated cycleway did not continue from Kennelsfort Road Lower and Old Lucan Road junction towards Chapelizod. This made sense because to impose such a cycleway at that location would remove on-street parking for residents of Old Lucan Road, Glenside Apartments, Woodfarm Cottages, Red Cow Cottages and St. Fintan's Terrace. In addition, it would sterilise the on-street parking for the commercial premises on the northside of the Old Lucan Road – most notably, the Ulsterbank and Coachhouse Café/Restaurant.

6.1.2. At present Palmerstown Village, from the M50 pedestrian bridge to the St. Fintan's Terrace Junction, provides a "quietway" for cyclists. It is not broken. The Quiet Street Treatment as defined in the proposal should be applied to the Old Lucan Road.

6.1.3. The 'quietway' works and there is no demand for a segregated cycleway through Palmerstown Village. In 2018 the following questions were raised at the SDCC Lucan Area Committee meeting on 22<sup>nd</sup> May 2018 ([www.sdublincoco.ie/Meetings/ViewDocument/60097](http://www.sdublincoco.ie/Meetings/ViewDocument/60097)):

*"To ask will the Chief Executive please indicate when the road markings to protect cyclists will be provided on the part of the Liffey Valley Greenway which lies along the Old Lucan Road in Palmerstown Village?"*

*Will he indicate whether the cycleway will be provided exclusively on the existing roadway or is it proposed that some or all of it will encroach on existing pathways?"*

*The reply from the Chief Executive of SDCC was " In a site inspection of this site, it was noted that both the volume and speed of traffic was low. Therefore, using the National Cycle Manual, a shared street arrangement, where cyclists share with general traffic would be the most appropriate facility in this case."*

6.2. There is no evidence of a threat to cyclist safety, as mentioned in 6.1.2.2 of Draft Preferred Route Options Report November 2020. We know of no pedestrian/cyclist, vehicular/cyclist or cyclist/cyclist accidents in Palmerstown Village.

6.3. We do note that the GDA Cycle Network Plan adopted in 2014 is relied on by the NTA (although it was not relied on in the March 2020 draft proposal) and it states at 3.5.2 "Dublin West - Proposals for Cycle Route Network Additions: In the Dublin West sector new cycling

facilities are required to complete the cycle route network at Primary and Secondary Route levels at the following locations: (a) Radial Route 6 along Palmerstown Village, Stewart's Hospital, and through Chapelizod Village". As explained at 3.1.11 above the reference to "Stewart's Hospital" is incorrect and again is misleading. It is quite feasible for the NTA to complete the cycle route network without sending a segregated cycleway throughout the length of Palmerstown Village (including the 50metre stretch outside the premises of Stewart's Care Limited) i.e. by giving the stretch of road (or part thereof) the "Quiet Street Treatment".

#### **6.4. Removal of on-street parking**

6.4.1. All on-street parking from the Old Lucan Road, from the M50 Footbridge at Hollyville Lawns, down through Palmerstown Village to the St. Fintan's Terrace Junction and along Kennelsfort Road Lower will be removed to facilitate a segregated cycleway. At a Community Forum on 11th November 2020, the NTA confirmed to us that 40-50 on-street parking spaces will be removed.

6.4.2. This is disproportionate given:

- the removal of on-street parking for residents
- the impact on the public realm,
- the creation of outstands that are not practical and hazardous, • the lack of demand; and
- the alternatives available

#### **6.5. West of Old Lucan Road and Kennelsfort Road Lower**

6.5.1. The removal of on-street parking from St. Philomena's Roman Catholic Church to Waterstown Avenue is going to push parking into residential areas of Hollyville, Riversdale, Robin Villas, the Horseshoe, Waterstown Avenue and commercial areas of Aldi, Mr. Price and Palmerstown Business Park. The church, for example, relies heavily on on-street parking for church users.

6.5.2. The retail outlet south of St. Philomena's Church on the Old Lucan Road and owned by Randleswood Holdings Limited opened as Mr. Price on 11<sup>th</sup> December 2020. On 12<sup>th</sup> and 13<sup>th</sup> December 2020 St. Philomena's Roman Catholic Church had to post signage on numerous vehicles parked on its property: With this in mind, no on-street parking outside the church is certainly going to lead to closed gates, barriers and the usual non-sociable street signs deterring people from parking.

6.5.3. You might also note that across the road from St. Philomena's Roman Catholic Church, to the west, an Indian Orthodox Church has been granted planning permission – which will create a

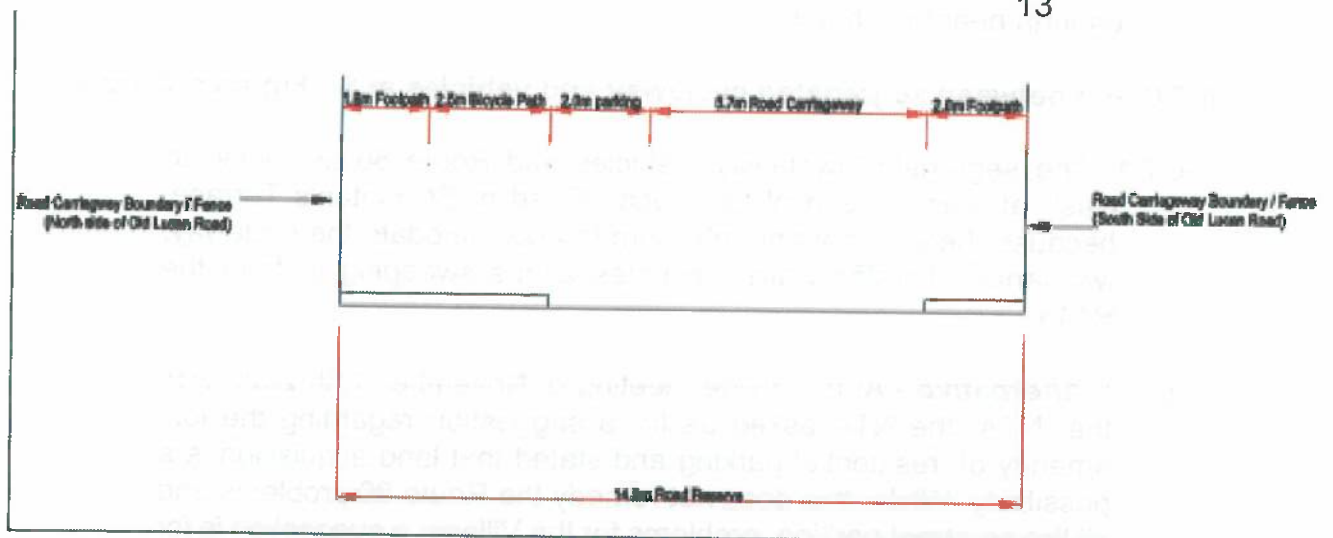


serious pinch point for merging and through traffic at that location.

## 6.6.Alternatives

6.6.1. We kindly ask BusConnects to investigate the provision of on-street car parking from St. Philomena's Roman Catholic Church to Waterstown Avenue, acknowledging that the latest plans seem to propose the removal of on-street car parking on the north side of the Old Lucan Road.

6.6.2. The road reserve (boundary fence to boundary fence) is approximately 14.0 – 16.5 metres wide. We kindly ask the Board to request a cross section profile similar to that below.



6.6.3. The cross section could incorporate, as a minimum, the following:

- A 1.8m wide footway on the north side of Old Lucan Road. This complies with the minimum footway width as per Figure 4.34 of DMURS;
- A 2.5m wide off-road Cycle Track. A 2.5 metre wide two-way cycle track is permitted under the Nation Cycle Manual (Refer to Section 1.5 of the National Cycle Manual);

- 1.8m - 2.0m wide parking lane; There is an opportunity to provide a small buffer (200 – 250mm) between the parking lane and the off road Cycle Track; and

- A 5.5 – 5.7m wide road carriageway. Old Lucan Road is lightly trafficked, is relatively straight and given that it is a dead end road (west of Old Kennelsfort Road), it can be classified as a Local Street under DMURS. Under Figure 4.55, a Local Street is permitted to have a carriageway wide of between 5.0m and 5.5m. Note that DMURS specifically says: *'Designers should minimise the width of the carriageways by incorporating only as many lanes as needed to cater for projected vehicle flows and by reducing the size of individual lanes to meet predominant user needs (See Figure 4.55). In this regard In new designs the standard land width on Arterial and Link Streets should lie in the range of 2.75 – 3.5m.....'*

6.6.4. On this basis, it is clear that a 5.5m – 5.7m wide road carriageway (2.75m wide lanes) is appropriate and there is space available to incorporate a parking lane adjacent to the proposed cycle track. Note that the road reserve is only wide enough near the church.

### **6.7. Clash between segregated cycleway and vehicles at St. Fintan's Terrace**

6.7.1. The segregated cycleway, vehicles and Route 80 are going to clash at eastern end of Old Lucan Road at St. Fintan's Terrace, because there is not enough room to accommodate the cycleway, two lanes of traffic which includes a bus sweeping in from the R148.

6.7.2. **Alternative** - At the online meeting of November 11th 2020 with the NTA, the NTA asked us for a suggestion regarding the lost amenity of residential parking and stated that land acquisition is a possibility. While this does not remedy the Route 80 problems and all the on-street parking problems for the Village, a suggestion is for the NTA to acquire the rear garden of number 2 Red Cow Cottages, which is owned separately from the house - it could facilitate some lost car spaces for Red Cow Cottage Residents and Visitors.

## **7. Other Alternatives**

7.1. When deciding to grant permission under the Strategic Infrastructure Act 2006, to accommodate the Core Corridor 6, An Bord Pleanála

may attach conditions as specified in section 34(4) of the Planning and Development Act 2000, which may include the following:

*“A condition providing for ‘community gain’. Such a condition may require the construction or the financing, in whole or in part, of a facility or the provision of a service in the area in which the proposed development would be situated and which the Board considers would constitute a gain to the community.*

*A condition controlling the use of land adjoining, abutting or adjacent to the application site which is under the control of the applicant where it is expedient for the purposes of or in connection with the development or appropriate for conserving a public amenity on the adjoining, abutting or adjacent lands.*

*A condition providing that points of detail relating to a specific issue may be agreed between the planning authority and the person carrying out the development. Any such agreement must be confined to the points specified by the Board. In default of agreement, the matter may be referred to the Board for determination.”*

7.2. An Bord Pleanála granted planning permission for the Vincent Byrne Site in September 2020. As per 7.1 above, the Board should request that Randalswood Holdings Limited grant a perpetual licence to SDCC for designated resident and public car parking spaces at a nominal cost. This would improve the linkages between the Vincent Byrne Site and Palmerstown Village.

7.3. If cyclists are to be encouraged to cycle into and through Palmerstown Village then a cycle stand and water station at an appropriate location on the northside of the Old Lucan Road would be very useful.

