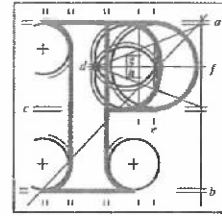


Our Case Number: ABP-314942-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Nessa Skehan
68 Palmerstown Drive
Palmerstown
Dublin 20
D20 HH97

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

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Name and Address of Observer

Nessa Skehan
68 Palmerstown Drive
Palmerstown,
D20 HH97

General observations on the process

According to the NTA Project Approval Guidelines, page 14, "The Sponsoring Agency, in particular the Project Manager (and Project Director for larger schemes), will be expected to place significant importance upon the development of collaborative, healthy and dynamic relationships with appropriate stakeholders at the relevant stages of the project life cycle. " There has been no engagement on this scheme with local residents.

Issues for Pedestrians/Bus users

1. According to the NTA's Permeability Best Practice Guide, "Consensus must be sought, insofar as is possible, between local residents and the relevant authorities as to the objective of any proposal to maintain an existing link or create a new one." No such consensus has been sought.
2. Furthermore, a number of elements are against best practice with regard to "permeability", ref. NTA's Permeability Best Practice Guide -
 - a. Removal of bus stop at Palmerstown Drive means that all residents on the city side of the Oval from Palmerstown Drive to Oakcourt will have a longer walk, in most cases in excess of 400m and to cross a busy road at the junction of the Oval and N4. Currently, those getting off the bus travelling west, at "Palmerstown Drive" on the R148 walk through a residential area and are free from interruption from heavy traffic. It is a very safe walking route for residents. Pedestrians travel along a laneway behind the current Circle K petrol station which is exclusively for the pedestrian use. It is understood that pedestrians have right of way on this pathway as it is long established bus stop. The removal of "Palmerstown Drive" bus stop, will force passengers to alight further along the route, further away from where they live and then travel across a busy road if they live south of the R148 and east of "the Oval"
 - b. No pedestrian crossing at the Oval for residents at the city side of the Oval to access the nearest bus stop.
 - c. Lack of pedestrian crossing at Junction of Oval and N4, an issue for older pedestrians and children attending schools at the Oval, due to:
 - i. Cars travelling from city turning left from second lane of N4 onto Oval

- ii. Cars travelling into city turning right from N4
- iii. Lack of left filter onto N4 makes road too wide for pedestrians to cross safely without a pedestrian crossing.

Disconnection of 26 (80) bus stop from C1/C2/C3/C4 bus stops.

1. No rationale provided for movement of bus stops from N4 to Old Lucan Road. Local councilors have advised that there has been no call for such a move by local residents.
2. 26 (to be renamed 80) turning right across N4 to enter Palmerstown Village will cause safety issues and traffic congestion as well as an additional disruption during construction.
3. Lack of common bus stop will be a deterrent for bus users – as Palmerstown is relatively close to town, city bound buses are often full and are boarded on a first come, first served basis. Splitting the stops will cause issues for bus users.
4. Bus stops on Old Lucan Road in cycle lanes are a potential hazard for cyclists, keeping 26 (80) on N4 would allow a fully dedicated cycle lane on the Old Lucan Road.
5. Bus stop proposed in front of listed buildings at Red Cow Cottages.
6. Note pedestrian lights have recently been installed at The Coach House and are not yet operational. The plan does not include these and instead proposes traffic lights nearer the village, an additional cost for no apparent reason.

Footbridge over M50 from Palmerstown to Liffey Valley

1. The existing pedestrian and cycle bridge across the M50, shown on sheet 11. is not wide enough for a two way cycle lane and a two way walkway. The RSA recommends that cars allow a gap of 1 metre in zones of up to 50kph (www.rsa.ie), this would imply that two cyclists travelling at a speed of up to 25kph in opposite directions would need a 3 metre wide cycleway. Therefore, there is no room for two pedestrians or wheelchair users to safely to pass each other on this bridge when cyclists are travelling in two-way directions. I would suggest a suitable replacement bridge be considered to benefit of cyclists, wheelchair users, mobility scooters and pedestrians. Given the cessation of the 18 bus route and the placement of new bus stops for the 26 (80) close to the Apple Green Petrol station, this bridge may be used more frequently by residents of the Old Lucan Road seeking access to bus stops at King's Hospital School/Liffey Valley Shopping Centre.

Issues for Car Users at Palmerstown Village Junction

1. Currently no left turn allowed at Palmerstown Village towards city at B&B, all cars being forced to use exit at Shaws. All residents in Riversdale Estate along with residents of New Apartments at old Vincent Byrne site, and workers at Stewarts Hospital will be forced to use congested exit at Shaws resulting in inevitable tailbacks. The Old Lucan Road will be transformed from a quiet residential road to a busy thoroughfare and a feeder road for the N4.

2. Left turn into Oval from second lane of N4 is highly dangerous for both drivers and pedestrians - to do so safely will force drivers to take illegal action by using bus lane.
3. Waiting in second lane to make left turn to the Oval will block traffic leaving the city on an already congested route.
4. Removal of left filter at the Oval towards Lucan will lead to long tailbacks in a residential area at school times in particular, with all the dangers of children attempting to cross the road to the school where there is no pedestrian crossing.
5. It appears that Planners/Engineers have not fully considered all the options regarding buses travelling out from Dublin. The old Lucan road R112, which connects Chapelizod with Palmerstown and onwards to Lucan was changed from a two way road and footpath, to a one way direction road and footpath. Known as the R112 on the maps; Lucan road. It is currently proposed that a two way cycle route be placed on this road, and no changes to the direction travel for cars and buses. Was the use of a contra flow bus lane properly considered here? It would be approx. 100meters in length. It could be placed alongside two way cycle track by fully utilizing the width of the road. This contra flow bus would allow the 26 (80) indeed any other buses travelling from Chapelizod to enter Palmerstown Village without having to access the R148 and hence remove the need for a right turn for buses only at the busy junction known as The Oval.
6. Travelling west on the R148, after passing through the junction known as Kennelsfort road. It is proposed to reduce the road available to cars from two, down to one lane and increase the number of bus lanes to two. One for the M50 and one to cross the M50 bridge. This is likely to create a build up of cars as the volume of cars is already substantial. This will increase the likelihood of a road traffic collision. Private cars exiting at Kennelsfort road, (which has the filter lane removed) wishing to travel towards Lucan will have to cross to the right most lane in order to travel west. Cars will inevitably use the bus lanes to switch lanes, access the M50 and to exit the city via R148 and M4.

