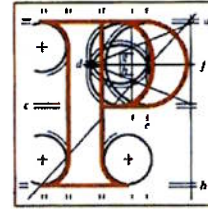


**Our Case Number: ABP-313892-22**



**An  
Bord  
Pleanála**

Ciarán Mac Annraoi  
15 Prussia Street  
Dublin 7  
D07 F7X0

**Date:** 26 July 2023

**Re:** Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme  
Blanchardstown to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie).

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

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

AA01

Teil	Tei	(01) 858 8100
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

**AN BORD PLEANÁLA**  
LDG- \_\_\_\_\_  
ABP- 313892 (HA)  
12 JUL 2023  
Fee: € \_\_\_\_\_ Type: \_\_\_\_\_  
Time: 17:25 By: HANU

CIARÁN MAC ANDRAOI  
15 SRÁID PHRÚISE (15 PRUSSIA STREET).  
Baile Átha Cliath 7 (Dublin 7)  
D07 F7X0  
Éire (Ireland)

An Bord Pleanála  
64 Marlborough Street,  
Dublin D01 V902,

Dé Céadaoin 12 Iúil 2023

Tagairt/Reference: ABP-313892-22

A Chara,

Following receipt of your letter, outlining that you plan to address the Busconnects B Spine application via written procedure, I am taking this opportunity to make my submission.

I enclose my original observation, dated 30 August 2022, which goes into more detail, and should be considered as part of my submission.

I am summarising, and re-iterating the points which I made, in my original submission, as they are still applicable

- 1) 24/7 Busgates at both Cabra Cross, and the junction of Prussia/Manor/Aughrim Streets. I see the benefit of these for the bus service, and the necessity during peak hours. However, they are not necessary during off peak hours, when traffic into Stoneybatter is already free flowing. Combining the timetables for the existing 3 routes coming into city along Old Cabra Road and Prussia Street, I counted 9 buses an hour, or one every 6.5 minutes off peak, throughout the daytime/evening, It is lower at weekends and even drops to 2 buses per hour overnight. Yet, to facilitate this, the route is locked down 24/7. Even if you tripled the off-peak service, it would still be overkill, for one bus every two minutes. Introduce a bus gate, during peak commute inbound in the morning, but open it after 10:00 so the connection to services in Stoneybatter isn't severed. That is where shops, doctors, chemists, financial institutions, restaurants, etc are located.
- 2) We have very lower car ownership in this ward, primarily because of its location, however cars are part of the mix, and the removal of 40 spots from Prussia Street/Manor Streets, has a disproportional impact on the residents of those streets. Nowhere else on the route is this scale of parking removed. In my case, a car is needed to transport my elderly mother, who can't cycle at all, can't walk long distances, and for whom public transport isn't always a viable option. I also use the car for long distance out of town trips, and where I need to transport goods/luggage. There is one car in the house for 4 residents. We do not have driveways on our property, we must use shared, on street parking, which is not reserved for residents. It is available to all road users on a first come, first served basis. The proposal sees c. 40 spots removed, which is 2 out of 3 spaces, and no alternative is mentioned.

Fón(Phone): [REDACTED]

Fón(Mobile): [REDACTED]

Rphoist(Email): [REDACTED]

In previous versions of the plan, there was a 3 lane cross section on Manor Street and cycle lanes were added. In such a scenario, parking would have to be removed. However, there is now only a two lane cross section, with cycle lanes added.

Given the existing road layout is a 3 lane cross section (bus lane with separate car lane inbound, and a shared lane outbound) and the proposal is for 2 lanes plus bike lanes, what is the need to remove all the parking? Use the space from one of the two inbound lanes that is being removed for the bike lanes, thereby enabling most of the existing parking to be kept. Can you show me anywhere else 2 out of 3 parking spots are removed on the B spine? Houses from Hanlon's Corner up were all built with driveways. I have reviewed the route map and where you are acquiring land on Navan Road, there is still ample room for a driveway for those houses. Imagine if 2 out of 3 driveways were removed, elsewhere on the route or outside your own property. And often those houses further out of town have much higher car ownership.

Furthermore, what about home help, medical professional and family visiting my elderly mother, they tend to drive, so where do they park?

3) Bus Stop Location. More detail is available in my previous submission which is enclosed but the spacing of bus stops is inconsistent. The gap between the inbound stop south of Hanlons Corner (1909) and the next stop on Manor Street (1713) is c. 650m, it is then about 200m to the next stop. That gap could be closed by moving stop 1713, further North to around 30 Manor Street. I would also add that since my original submission, Grangegorman Development Agency has acquired land on the site between 25 and 29 Prussia Street and I understand, they will be developing a new route for accessing TUD Grangegorman from Prussia Street. In light of this moving stops on Prussia Street closer to this new entrance, would be eminent sense for the students accessing the campus from the bus. It would also reduce the large distance between stops in the proposal. I would add there were both and inbound and outbound stops on Prussia Street beside St Joseph's Road, a number of years ago.

My proposal is aimed at achieving balance for the Stoneybatter end of the B Spine, allowing the buses to flow / improving their service, whilst reducing the impact on those who live in the area

Thank you for your time considering my submission

*Is Mise Le Meas*



CIARÁN

**CIARÁN MAC ANRRAOI**  
15 SRÁID PHRÚISE(15 PRUSSIA STREET).  
Baile Átha Cliath 7 (Dublin 7)  
D07 F7X0  
Éire (Ireland)

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

Dé Máirt 30 Lúnasa 2022,

A Chara,

I would like to submit my observation on case Blanchardstown to City Centre Core Bus Corridor Scheme.

As a resident of the above address, in which my family are owner occupiers for 60 years, I have some issues with the proposed development, and its impact on the Stoneybatter area.

I would recognise change is necessary to improve the bus service, both for residents of Stoneybatter and those coming from North West Dublin. However, without some changes to the above proposal, the area unnecessarily, becomes one big bus gate based on the current proposal, which lacks balance.

In principal, I welcome a balanced development. I met with the NTA as a member of the Stoneybatter Pride of Place delegation, and I acknowledge they have made some changes, from the original proposal which are an improvement. However, the application submitted to you, still has too great an impact on the Stoneybatter area, and it residents.

There is one car in this house for four adults. This is far lower than national average and in line with average for the electoral wards of Arran Quay where car ownership is around 30%.

For most of my trips, I cycle, walk, use public transport, generally in that order and as a last resort I drive, however sometimes I have no choice and must use the car.

Amongst the reasons for driving is my elderly mother, with whom I reside. She is a wheelchair pass badge holder, who receives visits from various medical / homecare assistants as well as relatives visiting occasionally. Furthermore, she has to go to various medical appointments. For her cycling is not possible, she can only walk a short distance, and public transport isn't always a viable option, so the car is needed. I therefore assess this proposal on how we move her / others come to her for the above activities. If it lacks balance, she could become a hostage to Busconnects.

I have reviewed the proposal to assess its impact on the area, my two biggest areas of concern are Traffic Flow and the parking of the car. I also looked at the location of the bus stops which I believe could be greatly improved.

Fón(Phone): [REDACTED]

Fón(Mobile): [REDACTED]

Rphoist(Email): [REDACTED]

### **Traffic Flow Northbound/Outbound**

I have no issue with the plan for traffic flowing out of town, I believe it is balanced as it promotes the quality and speed of the bus service. I believe this will increase the volumes using public transport, while still leaving viable alternatives for what will hopefully but a smaller amount of private vehicles.

The bus lane at the southern end of Stoneybatter where it intersects with North King St / Blackhall Place removes a pinch point that delays the service, where buses currently mix with cars all trying to go straight on. The bus will have its own lane on Blackhall Place, feeding through bus gate, at start of Stoneybatter. Cars must turn right and go on a minor detour around North King St / Georges Lane/Brunswick St.

The bus gate at Prussia St junction with Manor St / Aughrim St, allows a clear run for buses up Prussia Street, straight to lights at Hanlons Corner, instead of being backed up in traffic at those lights, whilst providing the alternative of Aughrim St / Blackhorse Ave which run parallel to Old Cabra Road/Navan Road to those going further North in private vehicles, again I fervently hope it results in a much reduced volume. Furthermore it still allows access to local amenities such as Park SC, Lidl and the bus gate at the railway bridge should clear another pinch point at Cabra Cross, after which you are on the wider roads with a cross section that supports dedicated bus lane and general traffic lane side by side, in both directions.

### **Traffic Flow Southbound/Inbound**

Unfortunately, I cannot say the same for the inbound route. Getting to our house from Northside, there is the alternative of Blackhorse Ave / North Circular Road so I can accept the 24/7 bus gate that prohibits cars turning from Navan Road into Old Cabra Road, at the Cabra Cross/Ratoath Road junction. However the 24/7 busgate at the bottom of Prussia Street, cuts off from the village with service providers such as doctors, pharmacies, etc.

I can accept the need for the bus gate at bottom of Prussia St. during peak hours inbound but not 24/7. I don't see a rationale justifying this bus gate off peak weekdays, never mind on a Saturday or better still a Sunday morning! That is where the plan lacks balance and is akin to using a sledgehammer to crack a nutshell. Unfortunately, with disastrous consequences for the vibrant inner city community that lives here.

If you sit at either Hanlons Corner or where the proposed Southbound bus gate at Prussia St / Manor St / Aughrim St would be located currently during peak hours, you are likely to see buses held up by traffic at both locations. For that reason, I would support the bus gate at peak hours. However, this is not the case during off peak, as I draft this letter everything is free flowing by my window and given I work here regularly throughout all hours of the day, I can assure you this is normal.

As part of this submission I reviewed the timetables of Dublin Bus for routes 39 / 39a / 39x / 70, all of which use Prussia Street (I excluded 37 as it only uses it outbound). Now I accept there will be new routes such as one of the Northern Orbital routes and most of the above will be renumbered as part of the B spine.

Notwithstanding that a total of 45 services currently leaving their origin in Dublin 15 / Dunboyne area, between 0630 and 0900. Those are the services which will pass Stoneybatter in peak hours 0700 -1000, it amounts to an average of one bus every 3.5 minutes.

To give those buses a free flowing run, the bus gate at bottom of Prussia Street and the one at Cabra Cross will see the pinch points at Hanlons Corner and getting onto Manor St removed. The service is therefore greatly improved, no arguments to that, as I previously outlined.

Lets look at off peak, I count 9 services in an typical hour throughout the day, leaving the same origins and passing the area. As expected a drastically reduced service of one every 6.5 minutes due to demand levels. So why does the bus gate have to operate during those hours and cut us off from the village?

With the bus gate at bottom of Aughrim Street and Cabra Cross in place, the amount of traffic on Prussia Street during these off peak times would be reduced further from current levels, when as I stated if flows freely.

Unfortunately, the NTA proposal does not have the same detour when one needs to use a car to get to Stoneybatter, it sends you on what could only be described as a rat run. Simply having a more realistic bus gate for peak hours only is a win win, improved bus service and no need for rat running

### **Parking**

Car ownership is lower in the Arran Quay wards due to its proximity to the city, and the various public transport option, however a car is still part of the mix. As a resident of Prussia Street, I currently cannot park on my road between 0700-1000 6 days a week, when parking bays are closed due to a clearway. Remember, one of the primary reason for the car is to assist my mother, I don't use it to go to work, the bike is far quicker. When we moved here first, you could park outside the front door. Now there are double yellow lines, but I have accepted those restrictions and the clearway, as part of living on a main route, so close to the city. Accepting this is predicated on there being a reasonable alternative for parking. Currently, due to the clearway, Dublin City Council assign me a permit allowing me to park on an available spot on Manor St. which could be anywhere from c.80 – 250m away. However this proposal for no reason removes a huge amount of parking and provides no alternative. The limited number of car owners don't have driveways, we don't have guaranteed spots, and we often park what most would consider, a long way from their residence. I accept that, but the removal of parking for no reason is unwarranted. Please put yourself in our shoes and don't be so flippant as to say use a neighbouring street. Have you made any arrangements for the residents with Dublin City Council, how do the residents of those streets feel about the extra cars moving over to them, any study on the impact and numbers affected?

And worst of all there the removal of a lot of this parking seems unnecessary. Lets look at the breakdown along the affected routes

Currently the length of Manor St has the following cross section

- Parking on length of Westside
- Bike lane (largely unsegrated)
- Shared Northbound / Outbound lane.
- General Traffic Inbound/Southbound lane
- Bus lane inbound/southbound
- Parking on length of east side.

Your drawings show only two traffic lanes, so a bus lane inbound/southbound is removed. I understand with the busgate on Prussia St and Aughrim St, it isn't necessary. Yes bike lanes are added in both directions but two bike lanes will hardly be the width of the bus lane. However, for the sake of argument, lets say they are, so it is a direct swap bus lane for two bike lanes, then why the need to get rid of all the parking on both sides at the northern end of Manor St? Here is a breakdown of what you are removing

Prussia Street: 10-12 bays that were available all the time except for 18 hours (3 hours \* 6 days) of clearway are gone. Why is this necessary, given the reduced traffic on the street. Currently with those cars parked, two buses can pass each other, and with the greatly reduced traffic volume Northbound, the odds of them passing, during that short stretch is small. I do see a bike lane on Northbound side that starts outside 76, surely given the previous 100m had no bike lane, the start could be pushed to North of St Josephs Road, where Prussia Street is wider, in order to retain the bays.

85 -76 Manor St (Westside of Southern end) is largely untouched

9-17 Manor St (Eastside of Southern end) I would estimate 6 spots gone. The bus stop area is elongated and the bike lane snakes in and out, if it was straightened you could easily accommodate some more spots there.

Green at junction of Manor St/Aughrim St/Prussia St. 7 spots removed, spots that have no impact on Busconnects and they can be accessed by Aughrim St Northbound 24/7 and if bus gate was amended as I propose by Prussia St southbound off peak.

22 -36 Manor St (Eastside Northern end) I would estimate 15-17 spots gone

59-71 Manor St (Westside Northern end) I would estimate 6 spots gone

Bottom of Aughrim St western side: 3 spots gone

As outlined given the cross section and the width of the road, there is no need to remove the vast majority of the estimated 40+ spots I see removed on Prussia St and Manor St. Perhaps some could go as part of the greening but certainly no need for the scale you propose.

### **Bus Stop**

The amended locations of bus stops is an improvement, in so far they are more evenly spread. For example, southbound, where there was a 130m gap between current stops 1713 (Manor St) and 1714 (Stoneybatter), and then a 300m gap to the next stop on Blackhall Place (1715). You propose what the current stop 1714 is moved south to even that out. Likewise Northbound what is 1648 (Stoneybatter) is being moved south and 1649 (Manor St) slightly North to widen out what was c. 130m gap. However the stops on Prussia St are still a long way from their adjacent stops. For example 1909, with is Prussia St inbound is 600m from 1713 on Manor St, that gap is way out of kilter with typical distance between stops in the area, and while it isn't as bad the gap between Northbound stops 1649 on Manor St and 1911 on Prussia St would still be c. 400m. This warrants re-examination.

## **Conclusion**

I have outlined the adjustments which I think would improve the plan and provide more balance for the community, however I strongly encourage the consideration of Congestion Charging and Camera Enforcement as part of these works. I understand they require legislative changes but there are an important part of the solution. Likewise, DublinBikes should be expanded to Stoneybatter, Cabra and further out.

Thank you for the time considering my submission.

**Is Mise Le Meas**

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**CIARÁN MAC ANRÁOI**