

An Bord Pleanála
Marlborough Street
Dublin 1

29 August 2022

Your Ref: HA29N.313892

BusConnects/NTA Application for Blanchardstown Bus Corridor

Stoneybatter Pride of Place (POP) is a voluntary organisation comprising residents, businesses and community groups in the Stoneybatter area. We have over 500 residents on our mailing list and 18,000+ followers on our social media (Facebook, Twitter and Instagram).

In 2016 Stoneybatter won the All-Ireland Pride of Place award as the premier urban heritage village in Ireland. The aim of Stoneybatter POP is to seek to make the area a safe, sustainable and attractive place to live and work and to build up a strong sense of urban community. We conduct regular clean-ups of the streets and plants shrubs and flowers in public places. We organise the three-day Stoneybatter Summer Festival which pre-Covid attracted more than 10,000+ people annually into the area and this year attracted approximately 15,000 people. (During the Covid Pandemic we organised a Virtual Festival). We engage with the local primary and secondary schools and senior citizens' groups in the area such as An Síol and the Capuchin Day Centre. We promote the local business community and provide a range of activities including the installation of lights on the trees of the village at Christmas. We promote sporting and cultural activities such as films, music, concerts, boxing and football.

All new projects are viewed in the context of the benefits they can bring to the area and the 15,000 residents who live in Stoneybatter and in its environs. Stoneybatter has a larger population than most towns in Ireland and has more than half the population of Leitrim!

The population of the area is set to increase dramatically with over 6,000 student accommodation beds already built or under construction, the redevelopment of the 16-acre site at O'Devaney Gardens, with over 1,000 residential units, and the development of the Technological University Dublin (TU Dublin) Campus at Grangegorman, with 20,000+ students and staff on campus when complete.

Stoneybatter Pride of Place welcomes this opportunity to make a submission to BusConnects on the Blanchardstown to City Centre Core Bus Corridor (CBC). We reiterate our support for the objectives of BusConnects to deliver better and more efficient public transport, safe cycle routes and enhanced pedestrian facilities.

We appreciate that BusConnects will play a pivotal role in achieving the targets set out in the Climate Action Plan (2021) to reduce overall emissions in the transport sector of 42% to 50% by 2030. While we welcome efforts to improve public transport and reduce/dissuade car use, Bus Connects changes must be balanced and must acknowledge the existence of a vibrant residential and business community in the Stoneybatter area.

We are also concerned that the current proposals do not sufficiently take on board the massive changes in traffic patterns since the COVID Pandemic with working from home a reality for a significant percentage of the workforce.

We wish to acknowledge the open and productive engagement we have had with the National Transport Authority (NTA) over the past few years in an effort to find workable and sustainable responses to the issues affecting our community. However, we wish to express our deep disappointment that this planning application was lodged in July/August at the height of the holiday period which made local consultation on our submission particularly difficult. There is no reason why the application could not have been submitted even two weeks later which would have greatly facilitated local communities prepare their submissions.

We welcome some of the changes that have been made to the original Emerging Preferred Routes (EPR) in response to issues we raised at our meetings with the NTA. However, we still have serious concerns about the impact of BusConnects on our community. We want better public transport and remain concerned that this should not be at the expense of our thriving urban village.

Stoneybatter Pride of Place has received numerous emails and comments through our social media from local residents, businesses, schools and community groups in relation to the current proposals. There are many diverse views and while we understand that some of the views may be contradictory, we thought it important to capture the main concerns of the Stoneybatter residential and business community.

We note that of all the proposals being put forward, there is strong support in the community for relaxing the Bus Corridor on Prussia Street and the Bus Gates on Manor Street and at Blackhall Place during off-peak hours, and particularly at weekends. Such a measure would greatly help to mitigate the adverse impact of the present proposals.

1. Public Transport & Cycling/Pedestrian Infrastructure in Post Covid Dublin

The COVID-19 pandemic created unforeseen challenges and opportunities for public transport in Dublin. It will take some time to measure the long-term impacts but a number of trends can be identified at this point:

- i. **Home-working** is set to continue post-Covid and the number of commuters will reduce. We would query if sufficient attention has been paid to this in the NTA's statistics and modelling forecasts at the outset of the BusConnects project will have to be revised to take account of the levels of working from home and the impact this has on public transport. **Since the Blanchardstown to City Centre Bus Corridor is focussed on bringing the maximum number of commuters in and out of the City Centre offices and places of work, the entire premise on which BuConnects is based could be undermined by home-working.**
- ii. **Cycling** is viewed as a safer mode of public transport and lower commuter traffic over the past two and a half years has encouraged more people to adopt this as their

primary means of transport. The emphasis on safe cycling measures has become even more integral and important to the BusConnects project.

- iii. The need for social distancing during the pandemic highlighted the importance of a good **pedestrian infrastructure** and having footpaths that can safely accommodate large numbers of pedestrians. The BusConnects project provides an ideal opportunity to widen and improve the accessibility of the footpaths throughout the village. The streets that will bear the brunt of the BusConnects generated traffic should receive special landscaping and infrastructural treatment.

2. Impact of New Traffic Management Proposals on Residential Streets and Village

The revised proposals will increase traffic on a number of residential streets and impact negatively in terms of the creation of new arterial routes, rat-runs and the degradation of air quality.

- i. **Prussia Street Bus Corridor:** The creation of a 24/7 Bus Corridor on Prussia Street is problematic on a number of fronts as general traffic will be displaced into local residential streets.

Prussia Street is a fine example of a mixed-use street. Many of the existing houses are still used as family residences and there are a number of residential streets off Prussia Street (Fingal Place, St Joseph's Place and St Joseph's Road). Residents of Fingal Place are particularly concerned about the problems created for vehicular traffic to access & egress their homes.

Prussia Street is one of the oldest streets in Dublin and before its destruction (authorised and unauthorised) consisted mainly of early Georgian houses of varying size, height and design which created an attractive streetscape. The uncontrolled demolition of these buildings combined with the construction of nondescript edifices (i.e., shopping centre, apartment blocks of no architectural value and garage/workshops) has deprived the street of much of its character and ethos. However, with the advent of TU Dublin to the area there is a unique opportunity to develop Prussia Street as a vibrant, living and economic quarter of our village. **The Draft Dublin City Development Plan (2022-28) is proposing that Prussia Street be designated a Special Development and Regeneration Area (SDRA). Turning Prussia Street into a 24/7 Bus Corridor is in direct conflict with this proposal.**

We are concerned that the use of Prussia Street only as a Corridor will impact negatively on the residential and commercial nature of the street.

Lifting out-of-peak restrictions on the bus gate on Manor Street and the bus corridor on Prussia Street would help reduce much of the pressure on Aughrim Street and Oxmantown Road and facilitate mobility for residents of Fingal Place, St Joseph's Place and St Joseph's Road.

Consideration should be given to reinstating parking on Prussia Street during non-peak hours, particularly if the Bus Gate can be lifted during these times.

- ii. **Aughrim Street:** Residents of Aughrim Street remain deeply concerned about the proposal to route all northbound traffic (including commercial trucks/lorries/vans) through this residential street. There is a very busy parish church on Aughrim Street which holds one funeral most days. St Gabriel's School is accessed from Aughrim

Street and the increased traffic on Aughrim Street will create road safety issues for pupils attending this school and for elderly people attending church services. The N2 bus will travel down Aughrim Street at least three times per hour. Aughrim Street is quite a narrow street beyond the junction with St Joseph's Road, where most houses do not have front gardens to act as a buffer against the increased traffic. There is a real danger of the street being overwhelmed.

Aughrim residents are concerned that Aughrim Street is now the only arterial route for all general traffic travelling northwards from the James Joyce Bridge to the North Circular Road.

Lifting out-of-peak restrictions on the bus gate and bus corridor on Prussia Street would help reduce much of the pressure on Aughrim Street and Oxmantown Road. General traffic should be dissuaded from using Aughrim Street to access Oxmantown Road while still facilitating access to St Gabriel's School on Cowper Street for parents and staff from Aughrim Street. Also, a pedestrian crossing on Aughrim Street at the junction of Cowper Street should be installed to facilitate church and school crossings.

- iii. ***St Joseph's Road:*** Residents of St Joseph's Road are concerned that the one-way proposal for this street will increase vehicular traffic, particularly delivery vans, travelling from Aughrim Street to Prussia Street and Park Shopping Centre.
They propose to allow two-way local traffic on the street but making the junction of St Joseph's Road with Aughrim Street exit only.
- iv. ***Oxmantown Road:*** Residents of Oxmantown Road are particularly concerned that this street will become a primary route into Stoneybatter from the North Circular Road. Oxmantown Road is a residential street, and the houses have no front gardens to act as buffers against huge volumes of traffic. Proposals for the redevelopment of O'Devaney Gardens are at an advanced stage with 1,147 new housing units proposed and at least an additional 400 car-parking spaces.

Oxmantown road is a quiet residential street with families and children. It cannot be turned into a major rush hour traffic artery for people coming in and out of the city. While BusConnects proposes to have turn bans into Oxmantown Road, these will only be effective if there is proper enforcement.

However, it would also be important to limit access to Oxmantown Road from Cowper Street while continuing to allow access to St Gabriel's School at Cowper Street and Carnew Street. A left turn ban at the top of Cowper Street on to Oxmantown Road should be considered.

The proposals in relation to Aughrim Place are not at all clear as they refer to Aughrim Place running north south but Aughrim Place runs in an east/west direction (from Aughrim Street to Oxmantown Road). Moreover, no signs or notices have been placed on Aughrim Place to inform residents of the current proposals.

Some Oxmantown Road residents have also suggested a "trickled bollard system" which would facilitate local access but would discourage commuter traffic to use Oxmantown Road as a route to Stoneybatter.

- v. **Kirwan Street:** The proposal to allow traffic turn into Grangegorman Lower from George's Lane is a matter of some concern to residents of Kirwan Street and Kirwan Street Cottages. Kirwan Street is a narrow street and houses there have no front gardens which might act as a buffer against additional traffic.

The Filtered Permeability scheme at Grangegorman has put additional pressure in terms of traffic and parking on Kirwan Street. The main entrance to Stanhope Street Primary School is on Kirwan Street and the school has reported additional pressure with the Filtered Permeability scheme.

While it is important to retain vehicular access for residents on Kirwan Street, there should be restrictions on general traffic using Kirwan Street as a main route out of the City to avoid traffic back-ups on Brunswick Street. The right-turn ban at the junction of Kirwan Street and Manor Street will achieve that but it will also have the effect of making it difficult for Kirwan Street residents to access the Phoenix Park, Park Shopping Centre or to travel in a northbound direction.

Some Kirwan Street residents have proposed an alternative system whereby the traffic diversion on North King Street and George's Lane would be replaced with a priority system at the BusGate on Blackhall Place. This would obviate the need for commuter traffic to use either Brunswick Street or Kirwan Street.

- vi. **Arbour Hill/Montpelier Hill and Infirmary Road:** The current proposals will result in a number of new rat-runs being developed and will increase traffic on the streets between Manor Place and Arbour Hill and between Arbour Hill and Infirmary Road. Residents on Montpelier Hill and Arbour Hill are particularly concerned that the traffic restrictions will divert much more traffic through their streets. Montpelier Hill is already adversely impacted by the Criminal Courts of Justice in terms of traffic and parking.

In many cases the proposals are vague, stating that consideration is being given to left or right turn restrictions with no clear indication of exactly what is being proposed. In essence residents are being asked to buy a "pig in a poke" and believe that the NTA will sort out the ensuing traffic problems at a later date. This is not acceptable.

Relaxing the Bus Corridor on Prussia Street and the Bus Gates on Manor Street and at Blackhall Place during off-peak hours and weekends would relieve pressure on these areas and facilitate access through the village.

- vii. **Air Quality:** Residents, particularly those on the above streets, are concerned about the negative impact that traffic levels will have on air quality across Stoneybatter. The World Health Organisation identifies urban air pollution as "the invisible killer". It increases the risk of cardiovascular and respiratory disease, cancer and adverse birth outcomes, and is also associated with higher death rates. We note that the NTA state that on their projections the impact on air quality will be negligible.

We are seeking reassurance that the NTA ensures that emissions do not exceed the WHO recommended exposure levels for particulate matter (PM10 and PM2.5), ozone, nitrogen dioxide and sulphur dioxide, as well as any equivalent guidelines that are designed to encourage an improvement in air quality. We request that the NTA undertake to monitor regularly air quality on the above residential streets during peak traffic times, and to share their findings with local residents.

viii. Road Safety

Local residents are also concerned at the risk that the increased traffic levels on residential streets will pose for the safety of pedestrians, cyclists and other road users. There are many children and schools in the area and increased traffic levels will dissuade parents from encouraging their children to walk and cycle.

We welcome the proposal for a 30km per hour speed limit through the village, and request that this be monitored by speed checks and visible signage with speeds flashing on it (this is used in several urban villages e.g., Palmerstown).

3. Impact of Proposals on Manor Street and Stoneybatter

We believe the proposal to make Prussia Street a 24/7 Bus Corridor is flawed resulting in a series of complex and possibly unenforceable traffic restrictions which will inhibit local and visitor access to the village and create a series of rat-runs across a number of residential streets.

A complex system of turn restrictions and one-way streets has been devised to mitigate the impact of the project on certain streets which results in closing off vehicular access to the village for local traffic. Local traffic looking to access the village will have to undertake a circuitous route along the North Circular Road, Infirmary Road, the Quays and back up Blackhall Place, down North King Street and back up Brunswick Street. Longer car journey times through this circuitous route will have the effect of increasing emissions.

Local businesses are particularly concerned about the impact this will have on their trade. For example, **Grants Clothing**, which has recently celebrated its centenary in Stoneybatter, services schools from all over the country and particularly from Meath, North Dublin, Kildare and Wicklow. They are big local employers. They are particularly concerned as to how their customers can access their business and where they will be able to park when they arrive.

There is a very real concern that Bus Connects in its present form will reduce Prussia Street, Manor Street and Stoneybatter to mere bus corridors, thereby ripping the heart from a thriving commercial village with 95 independent local businesses. The experience of nearby Queen Street a once thriving street is cited by local businesses as an example of the existential threat of BusConnects to the village.

Lifting out-of-peak restrictions on the Prussia Street bus corridor and Manor Street Bus Gate would be essential to allow access to the village. We suggest that the Bus Corridor/Bus Gates operates Monday to Friday 7am to 10am and 4pm to 7pm. That would allow normal commercial activity take place in the village during the day and also at weekends.

Moreover, this solution would relieve pressure on other streets such as Aughrim Street, Oxmantown Road, Prussia Street and Kirwan Street.

4. Impact of Diversions through North King Street at Lower End of Stoneybatter

The proposal for a complex diversion system at the lower end of Stoneybatter through North King Street, George's Lane and back up Brunswick Street/Kirwan Street is a major cause of concern for residents and businesses alike. There was considerable enthusiasm for the original proposal for a cycle/pedestrianised area on Brunswick Street North.

Walsh's Pub have expressed their concern that their cellar access is located on North Brunswick Street and they are particularly concerned as to how they will receive deliveries.

We have also received representations from residents and groups at North King Street including **Slí An Chroí**, the **SPADE Enterprise Centre** and the **North West Inner City Network** about the impact of diverting traffic down North King Street and through George's Lane. The SPADE centre is an old church dating back to the late eighteenth century and there is a residential house in the grounds from the same period. They are concerned that these diversions effectively cut off the two villages of Stoneybatter and Smithfield.

Businesses and residents in this area have called on the NTA to replace the BusGate at North King Street with a Bus Priority system at Blackhall Place would also help alleviate this problem. This would obviate the need for the complex diversions through North King Street and Brunswick Street. It would allow the restoration of the proposal for a Cycle Lane/pedestrian zone on Brunswick Street North.

However, the NTA has continued with its plans for the full-scale Bus-Gate at Blackhall Place and so it appears they are not willing to consider this alternative. If An Bord Pleanála is not minded to support this proposal, we would suggest that the BusGate and traffic diversions at Blackhall Place/North King Street be lifted during off-peak hours which would provide some alleviation.

5. Removal of Parking and Loading Bays on Prussia Street, Manor Street

We estimate that a total of at least 78% of the existing car-parking spaces in Stoneybatter will be removed as follows:

West side / outbound

10 places: North end of Stoneybatter (after Drink Store) - Manor Place

16 places: Manor Place to Aughrim St

3 places: Bottom of Aughrim St, at Cow Lane

7 places: Kavanaghs/Chipper

West side total parking spaces to be removed: 36

Eastside / inbound

10 places: Prussia St

3 places: 39-41 Manor St (Doctor Surgery to archway into yard at 38 Manor St)

7 places: 37 Manor St to Shea's Court

9 places: Manor Street – from Shea's Court to Kirwan St

7 places: Manor Street from Manor Pharmacy to bus stop at convent entrance

5 places: Manor Street at Grants Clothing

East side total parking spaces to be removed: 41

Total Parking Spaces to be removed: 77

Parking that will be retained

12 on Westside of Manor St above Manor Place

5 between Kirwan St and Stoneybatter

Total 17 parking places retained

Therefore 78% of the total parking spaces in the village will be removed

The removal of this amount of parking will have significant adverse impact on local businesses. There are a number of health service providers in the area who have disabled and elderly clientele who drive to these businesses, including doctors' surgeries, pharmacies,

physiotherapists/acupuncture, health stores, as well as the Credit Union. The removal of parking combined with the lack of loading bays will create significant problems

The number of loading bays on Manor Street Stoneybatter has been reduced to three. This includes the area outside the Centra supermarket but this does not take account that this area has been taken in charge to extend the footpath during COVID-19 and there is also a bicycle parking area there too.

In actual fact there are just two loading bays to service the entire village which is not sufficient. This means that businesses in the heart of the Village on Manor Street and Stoneybatter cannot safely accept deliveries or arrange deliveries to customers. BusConnects makes no provision for alternative delivery systems.

The lack of loading bays and parking on Manor Street/Stoneybatter will create huge difficulties for local businesses who need to receive goods and organise deliveries to customers. Several of the restaurants in the village have developed thriving businesses through the Covid-19 pandemic through Click & Collect and Delivery services.

The lack of provision for deliveries/collections would destroy these carefully nurtured businesses that have survived Covid-19 only to find that BusConnects now threatens their existence.

The lack of loading bays will also create pressure on parking spaces in surrounding streets off Manor Street and Stoneybatter as alternative parking will be sought by local residents. We are also aware of a number of residents with disabilities on Manor Street and Prussia Street and who need access to cars from a care perspective.

The issue of loading bays and deliveries is one that needs to be addressed in tandem with Dublin City Council. It needs decisive and courageous action from Dublin City Council, including incentivising deliveries outside core hours and dark drops, developing working last mile delivery solutions, strict and enforced time zoning and de-incentivising the use of large inefficient delivery vehicles for small products.

Consideration should be given to reinstating parking on Prussia Street during non-peak hours.

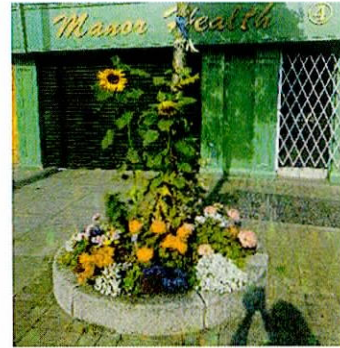
The removal of 78% of the parking places in the village is not acceptable.

The provision of parking and loading bays combined with adequate parking enforcement will be essential to allow the flow of traffic through the village.

6. Greening Stoneybatter / Public Realm

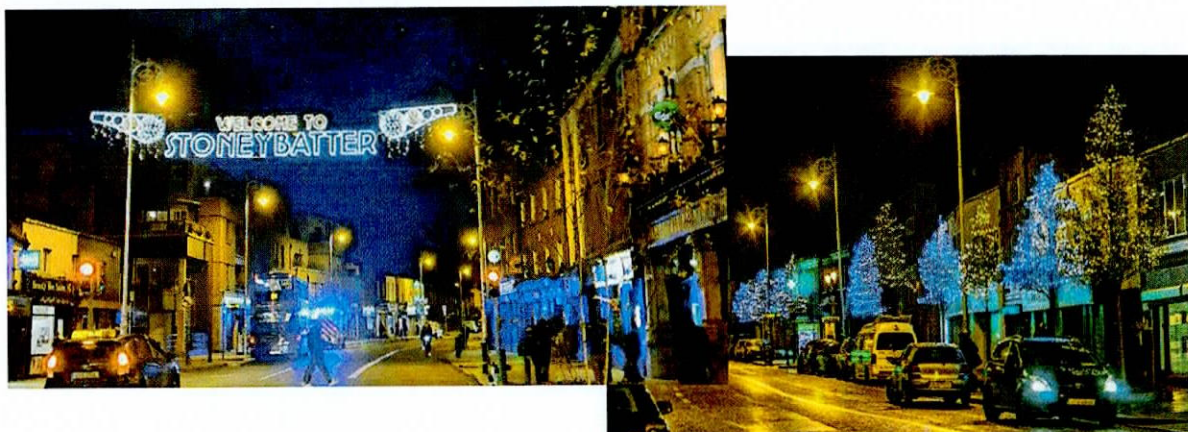
Stoneybatter Pride of Place has been particularly active in promoting environmental initiatives in the area. Local residents have invested considerable time and money in developing our green spaces and planters along Manor Street/Stoneybatter. We have a network of volunteers carrying out monthly clean-ups, planting and other activities. All of this activity led to Stoneybatter winning the All-Ireland Pride of Place Premier Urban Heritage Village in 2016, becoming the overall winner in the City Neighbourhoods Competition in 2018 and Urban Village in 2019.

The 18 trees with the flowers at their base are a defining feature of Manor Street. They have been tended to by local residents for decades.



Since 2018 we have Christmas lights on all of the trees on the street and a “Welcome to Stoneybatter” sign at the entrance to the village was added in 2021. This has been a phenomenal success. Dublin City Council also provides their Christmas lights on a tree at the top of the village.

The initial proposals sought to remove much of the Green area at the junction of Manor Street/Aughrim Street and Prussia Street. While we welcome the NTAs current proposals to upgrade the Green Area at this junction, we would be concerned that the final plans and drawings are unclear. It should be a condition of the planning that the landscaping of this area be done in close co-operation and only after a full consultation with the local community.



We welcomed the NTA’s presentation to the Stoneybatter PoP Group and their presentation at the Community Forum where it was explicitly stated that the revised proposals would in fact ensure wider footpaths and avert the need to remove four trees. However, we are concerned that the maps provided have not reinstated the four trees and show just 14 of the 18 trees on Manor Street. **We remain totally opposed to the removal of any of our trees on Manor Street including the trees at the Green Area at the top of the Street.**

We are currently working with Dublin City Council on the Greening Stoneybatter initiative. We hope to start implementing some projects later this year. However, Dublin City Council’s team have been informed that Prussia Street, Manor Street and Aughrim Street are not within their remit as they are part of the BusConnects project. We would urge BusConnects to engage with the Dublin City Council on the Greening Stoneybatter initiative.

Bus Connects provides an opportunity to make significant improvements to the public realm including local planting, pedestrian and cycling facilities and road surfacing. We reiterate

our request that the design elements for Manor Street and Stoneybatter be drawn up in consultation with local residents/business groups and the Greening Stoneybatter initiative.

Planting should be pollinator friendly and perennial in keeping with Stoneybatter's achievement of becoming the first pollinator friendly community in Ireland. There is significant waste and carbon inputs associated with the current public planting schemes.

We have seen the greening of bus shelters take place in some European Cities such as Utrecht. We urge Bus Connects to carefully examine the possibility of greening all the Bus Shelters along the route of the Blanchardstown CBC, particularly in the Stoneybatter area.

We are supportive of the proposals to enhance the public realm at the Green area at the junction of Manor Street with Prussia Street and Aughrim Street. The design for these proposals should be done in conjunction with the local community and the Greening Stoneybatter initiative. Public realm improvements on Aughrim Street should also be included in the schedule of works.

7. Cycling

Cycling is increasingly recognised as a healthy, clean, sustainable mode of transport and an essential part of an inter-modal plan for sustainable urban travel. The Climate Change Action Plan has a commitment to investing 10% of transport infrastructure investment in cycling infrastructure. We would be interested to learn the breakdown of the percentage budget for cycle lanes in Stoneybatter vis-à-vis the percentage allocated for the bus infrastructure.

We are keenly aware of the need for more and safer cycle lanes in the Stoneybatter area. There is a large cycling population in the area and this is increasing exponentially. Cyclists have to battle many obstacles and junctions to navigate the streets safely.

We welcome the many improvements to cycling infrastructure in the Stoneybatter area that have emerged as the public consultation progresses. More than anywhere in the City a comprehensive cycling and pedestrian plan is required for Stoneybatter. There are four large primary and two large secondary schools in the area. In addition, there are currently over 10,000 third-level students in TU Dublin, Grangegorman and this is expected to rise to 24,000 in the coming years.

However, there are still areas that need to be addressed: the absence of a south bound cycle lane and only a partial north-bound cycle lane on Prussia Street remain a cause for concern. There is no cycle lane on Aughrim Street and the increased traffic will make this street particularly hazardous for cyclists.

Facilities for bicycle parking also need to be put in place across the village.

Safe cycling routes must be accompanied by speed limits in the village. We are advocating a 30km per hour enforceable speed limit through the Village.

There should be full consultation with local cycling/ residents/business groups on the route and design of the cycle lanes through the village.

At a meeting between Stoneybatter PoP and the NTA, it was agreed that a Dublin Bikes Station would be installed outside Love Supreme. Disappointingly that Bike Station has not been included in the current planning application.

We need a comprehensive cycling plan which will link the Blanchardstown CBC with the Liffey Cycle Route.

8. Pedestrian Infrastructure

The recent COVID-19 crisis has emphasised the importance of having wide pavements to facilitate social distancing and allowing people space to exercise through walking/running etc in an urban context.

We understood that the NTA were proposing to widen the footpaths on Manor Street and Stoneybatter. However, it seems that the width of the footpath on Manor Street will be reduced to allow for the Cycle Path on Manor Street. We would call for wider footpaths at the junction of Stoneybatter/North King Street (at Lucky Barbers) and also at the junction of Prussia Street and Manor Street.

Footpaths in Stoneybatter along the route of the Bus Corridor – Stoneybatter, Manor Street, Prussia Street and Aughrim Street should be checked for accessibility and disability access. All footpaths should be dished at appropriate intervals to facilitate wheelchair users.

We are concerned that the current proposals do not have Toucan/pedestrian crossings at the southern end of the village. The removal of pedestrian crossings at Brunswick Street and North King Street should be reviewed.

The number of pedestrian crossings should be maintained with full accessibility for disabled crossing.

We welcome the revised proposal for an upgraded crossing at Aughrim Street/Prussia Street/Manor Street. However, we are concerned about the huge levels of traffic at that junction under the BusConnects proposal.

9. Additional Issues

In our previous submissions we proposed some measures that we believe would take pressure off Stoneybatter and the other fragile urban communities threatened by the Core Bus Corridors. These include:

- The introduction of a **Congestion Charge** for commuter traffic travelling within the Canal Ring would reduce inner city congestion. This solution has been proven to work in London and other major cities including Stockholm, Milan, Singapore and Valetta.
- Greater provision of **Park and Ride** facilities. It is disappointing that the current proposals still have no Park and Ride Facilities along the Blanchardstown Route. These should be provided at several points along the route. Parking should be free and incorporated into the price of the bus ticket. The Park and Ride provision must be presented as an integral part of the BusConnects project and not left on the long finger until some possible time in the future.
- Link-up with the **Railway line** at Navan Road/Parkway station. This line links up with the Luas at Broombridge and can transport commuters to the City Centre. Moreover, with the planned development of Metrolink and the major interconnector at Phibsborough, it will have the potential to remove a large quantity of commuter traffic from the road.
- **Express Bus Routes:** At present virtually all buses coming from Clonee, Blanchardstown and Castleknock pass through Manor Street and Stoneybatter. Consideration should be given to alternative routes for out-of-town transport. This would greatly relieve the out-of-town traffic pressure on Stoneybatter and Phibsborough.

- Legislation on **traffic enforcement** is essential . If BusConnects is to have any credibility the NTA, not the Gardaí, must take responsibility for policing the BusConnects project and any resulting traffic restrictions.

If BusConnects is to win widespread public support, such measures should be developed in tandem with the present BusConnects Proposal.

We were also disappointed that Dublin Bus has recently acquired a 100 strong fleet of high-polluting diesel buses. ***If BusConnects is to succeed in reducing carbon emissions to combat climate change and achieve the required legal targets of 42% to 50% reduction in emissions it will be essential to ensure that the BusConnects Fleet comprises low-emission vehicles only.***

10. Conclusion

The objectives of the BusConnects proposals are admirable, namely, to encourage more people to take public transport, significantly reducing the number of private car journeys, to reduce bus travel times into the city centre, and to improve cycling and pedestrian infrastructure. The residents of Stoneybatter are equally anxious to ensure the environmental and economic sustainability of our village.

The primary focus of BusConnects in Stoneybatter has been to provide a dedicated bus service into the City Centre. We acknowledge that the revised proposals mark an improvement on the initial EPR but contend that much work is still needed if these proposals are to be beneficial to the local Stoneybatter community.

We remain determined that we will not be collateral damage in the quest to transform the streets of our neighbourhood and community into a dedicated bus and private transport highway.

Finally, there should be provision within the BusConnects proposal to review the traffic situation in Stoneybatter and all the affected streets after 1 or 3 months to fix problems and to monitor enforcement. We would ask Bord Pleanala to require such a review.

Yours sincerely

Joe Costello
Chairperson

Davina Smith
Secretary

Louise Keegan
Treasurer