

Your Ref: ABP Ref. No. 313892

30<sup>th</sup> August 2022

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Dear Sir/Madam,

**RE: BusConnects Blanchardstown to City Centre Core Bus Corridor Scheme**

**An Bord Pleanála Ref. No. 313892**

We, Avison Young, in conjunction with Pinnacle Consulting Engineers, have been retained by our Client, Tesco Ireland Limited, Gresham House, Marine Road, Dún Laoghaire, County Dublin to prepare this submission in relation to the lodgement of the BusConnects Blanchardstown to City Centre Core Bus Corridor Scheme by the National Transport Authority (hereafter 'NTA').

The payment of €50, being the appropriate fee for making a submission, has been made online. Please note that all correspondence in relation to the observation should be sent to the Agents, Avison Young, 4th Floor, 2-4 Merrion Row, Dublin 2. We would request that An Bord Pleanála (hereafter 'ABP') keep us informed of any updates relating to this application.

The retail sector makes a major contribution to Dublin City and its suburbs, by increasing the vitality and viability of its urban settlements and villages, and acts as an economic anchor, creating significant employment and indirect economic and social activity. Having regard to this, we welcome this opportunity to engage with the NTA and ABP in respect of the preparation of the BusConnects Scheme.

Tesco Ireland Limited (hereafter 'Tesco') welcomes the proposed investment in public transport, active travel and the urban environment of Dublin. It is considered that the proposed BusConnects Scheme will greatly improve the way in which Dublin City functions from an economic, social and environmental perspective, however, Tesco have serious concerns regarding the impacts the proposal will have on their store located within the Park Shopping Centre on Prussia Street, should the current proposals be approved.

The Board is also referred to the enclosed assessment prepared by Pinnacle Consulting Engineers which sets out the implications of the proposed scheme in greater detail.

### **Impacts on Prussia Street**

The proposed interventions along and within the vicinity of Prussia Street will have significant impacts on accessibility and operational requirements of the Park Shopping Centre and the tenants of the shopping centre, including Tesco. Specifically, the introduction of bus gates on Old Cabra Road and at the junction of Prussia Street and Aughrim Street, will result in local traffic only being permitted through these bus gates, however, the application documentation does not define local traffic. These bus gates will have a significant impact on customer, delivery and service vehicles accessing the Park Shopping Centre and will require convoluted routes being taken to access the Centre.

As noted in the attached submission prepared by Pinnacle Consulting Engineers, the interventions proposed by Bus Connects at this location, including bus gates, revised junction layouts and restricted movements will reduce the accessibility for customers and delivery/service vehicles travelling to the Park Shopping Centre. The proposed bus gates and local access only will result in increased traffic using primarily residential streets to access the Centre and HGVs using a more circuitous route to facilitate deliveries, rather than maintaining the two-way system on Prussia Street which can facilitate larger vehicles.

The proposed scheme has been reviewed by Tesco's Central Distribution Team who note that bus gate on Old Cabra Road removes their access and egress route from the Prussia Street store. Alternative routes have been considered but none are practical as they are too narrow. For public safety, the most direct routes to and from the store are the safest as they reduce HGV movement as much as practical.

In addition, Tesco along with other large-scale convenience retailers currently operate a 'Central Distribution System' for deliveries. This involves the consolidation of individual supplier products at a central warehouse where they are organised and redistributed as part of a complete delivery. This system is an exemplar in terms of transportation management and environmental sustainability, as it allows one vehicle to deliver convenience goods to a few stores. Should the current proposals be approved, it will not be possible to service Tesco Maple Centre and Tesco Prussia Street under the central system.

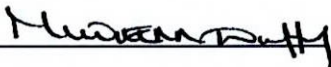
**Conclusion**

Tesco fully acknowledges and welcomes the need to improve the accessibility of our city in line with our European counterparts. In this regard, the NTA's investment in sustainable transport to improve the urban environment of Dublin City and its suburbs is welcomed, however, we would ask that the importance of daily servicing and ease of customer access not be overlooked.

The proposals to introduce bus gates to the north and south of Prussia Street, resulting in local access only, will force customers to take a longer more circuitous route. This will have a direct impact on customer behaviour, and they will seek out alternative options, thereby, jeopardising the viability of the anchor tenants and smaller units within the Park Shopping Centre. In addition, the proposal will result in longer HGV trips and potentially additional HGV's using the network as it will not be possible for the Central Distribution System to service both the Tesco, Maple Centre, Navan Road Store and Tesco Prussia Street with a single HGV.

We trust that the commentary and points raised in this submission will be considered by An Bord Pleanála in the assessment of this application. Should you have any queries on the above then please do not hesitate to contact us.

Yours faithfully



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**For and on behalf of Avison Young Planning and Regeneration Limited**



**PINNACLE**  
CONSULTING ENGINEERS

**PARK SHOPPING  
CENTERE**

**BUS CONNECTS  
REVIEW**

## 1. CONTEXT

The subject site is located on Prussia Street, approximately 2.0 km northwest of Dublin City.

The development is bounded by residential developments to the north and south, Prussia Street to the west and the Grangegorman Campus to the east.

The location of the site is shown on the map extract below in Figure 1.

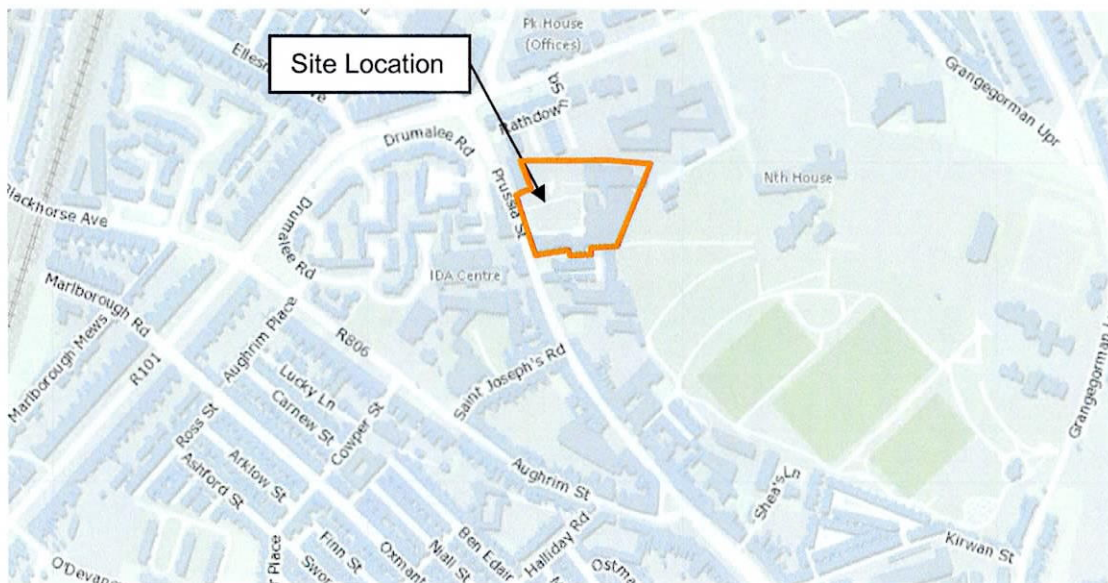


Figure 1 Site Location (Source: Google Maps)

The road network surrounding the site provides a variety of movement functions. The North Circular Road provides an orbital function and plays an important role in cross city movement. Prussia Street runs in a north/south direction and provides access to the site.

These routes provide for pedestrians, cyclists and motorists alike and a general commentary on these facilities is presented below:

The North Circular Road and Prussia Street provide important access to the N1, N2 and Cabra Road (N3). The N1, N2 and Cabra Road (N3) are strategic routes into Dublin City and provide connectivity to the Greater Dublin Area.

### North Circular Road

North Circular Road is a high-quality single carriageway road approximately 7.5m wide with approximate 2m wide footpaths on both sides. It runs in a general southwest to northeast direction and forms part of regional route R101. The North Circular Road will form a key access route to the development both now and because of the construction of the proposed Bus Connects upgrades.

The North Circular Road forms a signalised junction with the Old Cabra Road/Prussia Street in the southwest.

This road assigned a 50km/h speed limit. There are good quality footpaths provided on both sides of the North Circular Road along its length.

On road cycle lanes are provided in both directions between St Peter's church and the junction with Rathdown Road.

Prussia Street

Prussia Street runs from North Circular Road and becomes Manor Street, Stoneybatter and then Blackhall Place before joining Ellis Quay to the south.

The total carriageway width varies between 7.9m and 16.9m while minimum footpath widths of 1.9m are present on both sides along the route.

This road assigned a 50km/h speed limit.

## 2. Bus Connects Proposal

Bus Connects Dublin is a major investment programme to improve public transport.

It aims to overhaul the current bus system in Dublin through a 10-year programme of integrated actions to deliver a more efficient, reliable and better bus system for more people. This will be achieved by:

- Building a network of new bus corridors to make journey's faster and more reliable.
- New network of cycle lanes/tracks.
- Redesign of the Dublin area bus network to provide a more efficient network with high frequency spines, new orbital routes and increased bus services.
- Develop a state -of-the-art ticketing system.
- Implementation of a cashless payment system.
- Simpler fare structure.
- New bus stops and shelters with better signage and information.
- Provision of bus-based Park and Ride sites in key locations.
- New bus livery providing a common style across different operators; and
- Transitioning to a new bus fleet with low emission vehicle technologies.

The Blanchardstown to City Centre Core Bus Corridor (CBC) commences on the north side of the South Blanchardstown Road junction with the N3. The CBC proceeds on the R121 Blanchardstown Road South into the Blanchardstown Shopping Centre. From a new terminus to the north-west of Blanchardstown Shopping Centre the CBC is routed onto the N3 Navan Road via the Snugborough Road junction and follows the N3 and Navan Road as far as the junction with the Old Cabra Road. From here the CBC is routed along Old Cabra Road, Prussia

Street and Manor Street to the junction with North Brunswick Street. The CBC is then routed via Blackhall Place as far as the junction with Ellis Quay and Arran Quay, where it will join the

existing traffic management regime on the North Quays. Priority for buses is provided along the entire route, consisting primarily of dedicated bus lanes in both directions, with alternative measures proposed at particularly constrained locations.

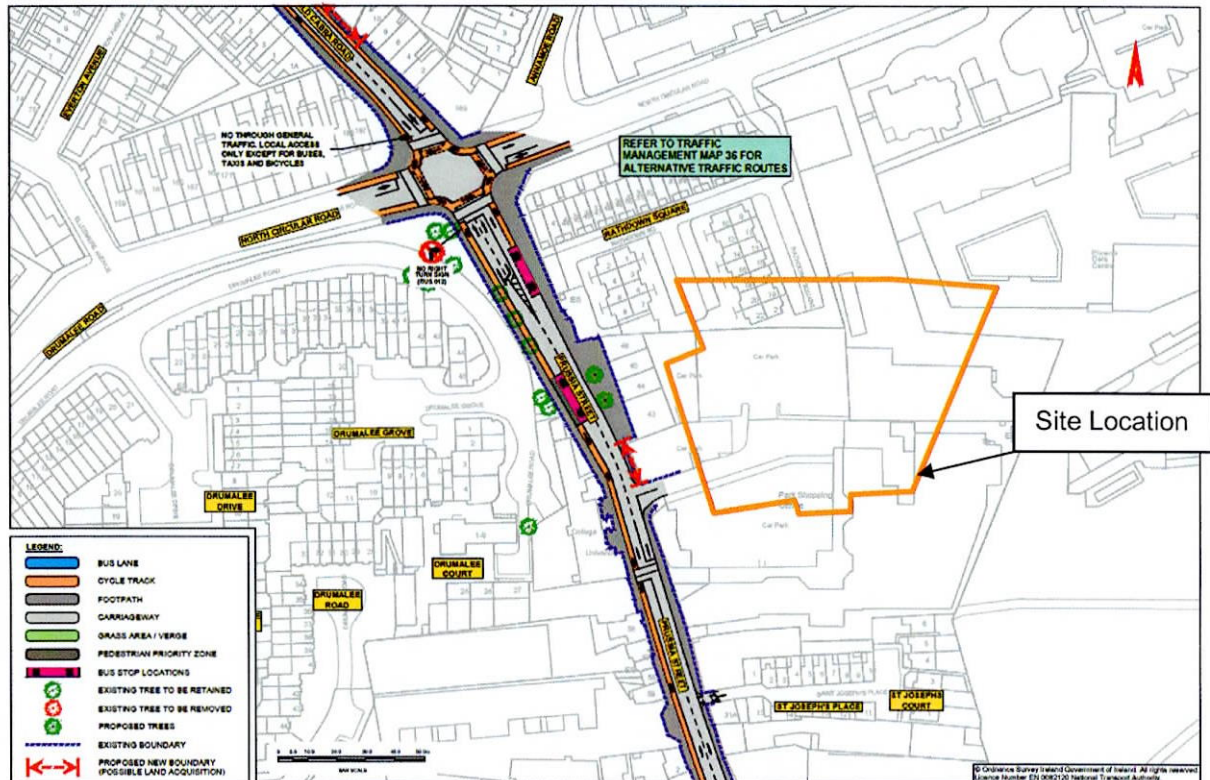


Figure 2 Bus Connects Route - Prussia Street (Original)

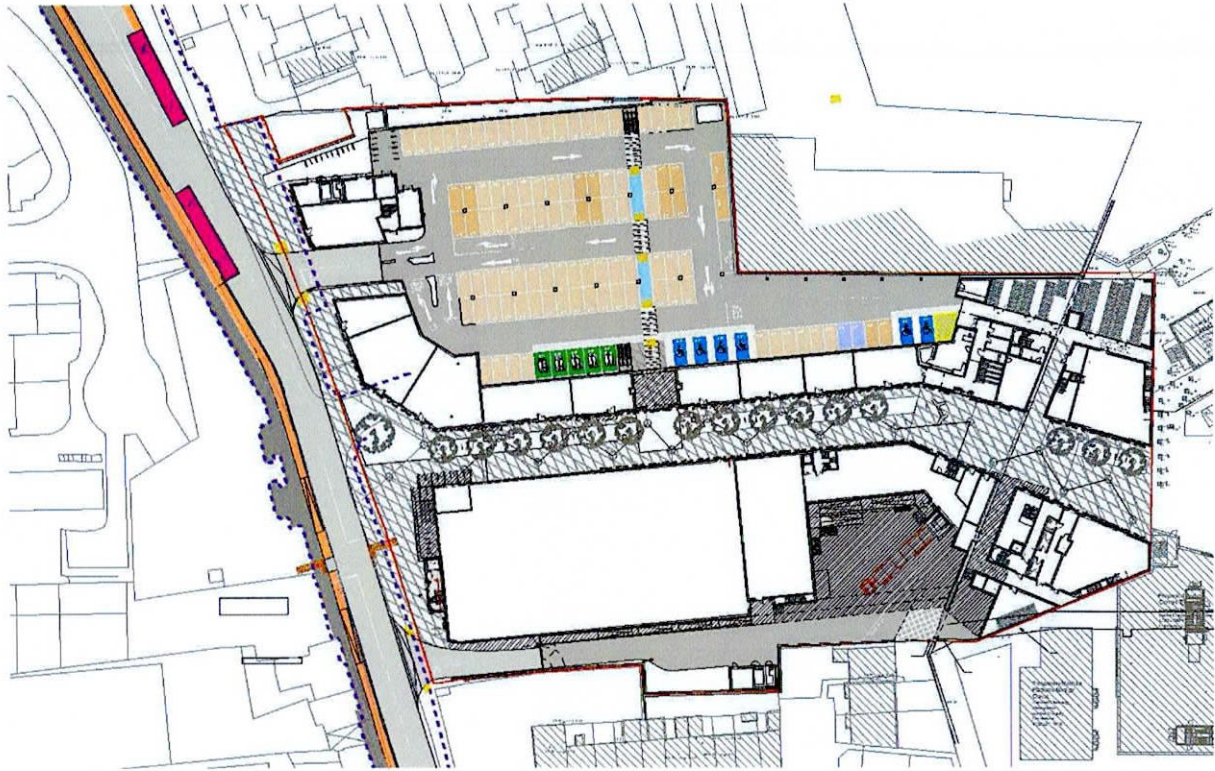
Under SHD Case Ref. Ref. TA29N.309657, the Applicants entered discussions with Bus Connects Team via the Executive Planner Transportation Planning in Dublin City Council.

To that end, the Bus Connects proposals for Prussia Street were issued to the Applicants in DWG format. These layouts were incorporated in the scheme proposals as illustrated in Pinnacle Engineering Drawing No. P200101-PIN-ZZ-ZZ-DR-D-103-S2-P01 GA Bus Connects.

As part of the engagement with Dublin City Council the following items were requested:

- Proposed layby (taxi set down area) to south of development
- Proposed bike stands at 2 locations on footpath (resulting in a discrepancy in footpath widths between the CBC scheme and the proposed development)
- Indicated tactile paving on both footpaths that do not align with the proposed CBC pedestrian crossing location (i.e., crossing point does not tie up)

These amendments have not been included in the current Blanchardstown to City Centre Preferred Route as illustrated in the extract from Pinnacle Engineering Drawing No. P200101-PIN-ZZ-ZZ-DR-D-103-S2-P01 GA Bus Connects.



**Figure 3 Integrated Bus Connects / Jameson Gate SHD Layout**

### 3. Traffic Counts

A planning search was carried out to determine any planning applications that would have relevant traffic survey data.

The site currently has the benefit of planning under SHD Case. Ref. TA29N.309657 which was granted on 29/06/2021.

Traffic counts were extracted from this application. These counts were carried out in support of the original application for the redevelopment of this site.

Accordingly, classified counts were carried out on the 6th of November 2015 at the following junction locations:

- Location 1 – North Circular Road/Prussia Street
- Location 2 – Site Access
- Location 3 – Prussia Street/Aughrim Street

The location of the survey points is depicted below at Figure 4.



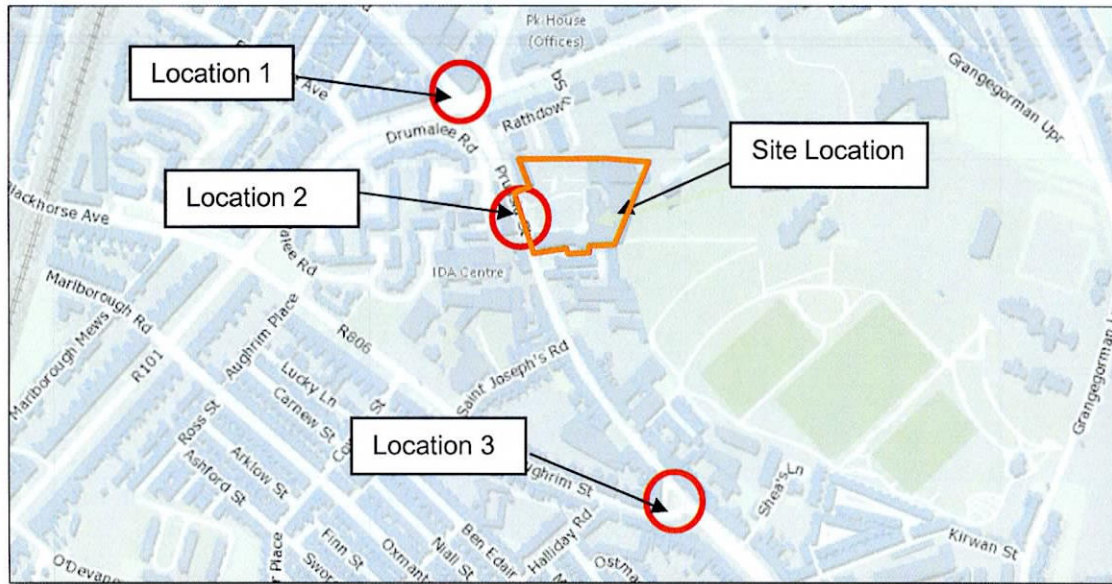


Figure 4 Location of traffic survey points

The locations of the surveys are each pertinent to the proposal in terms of being at key nodes in the road network that would be affected by traffic assignment and distribution of flows associated with the development site.

The surveys were carried out on the dates identified above to ensure that flows were representative of normal term time and hence not affected by school holidays or other public holidays or events. As such they provide an appropriate and robust representation of a neutral month during a period of normal school and employment activity. The surveys are designed to provide representative values encompassing AM and PM peak periods during normal traffic conditions.

A summary of the turning movements is illustrated below.

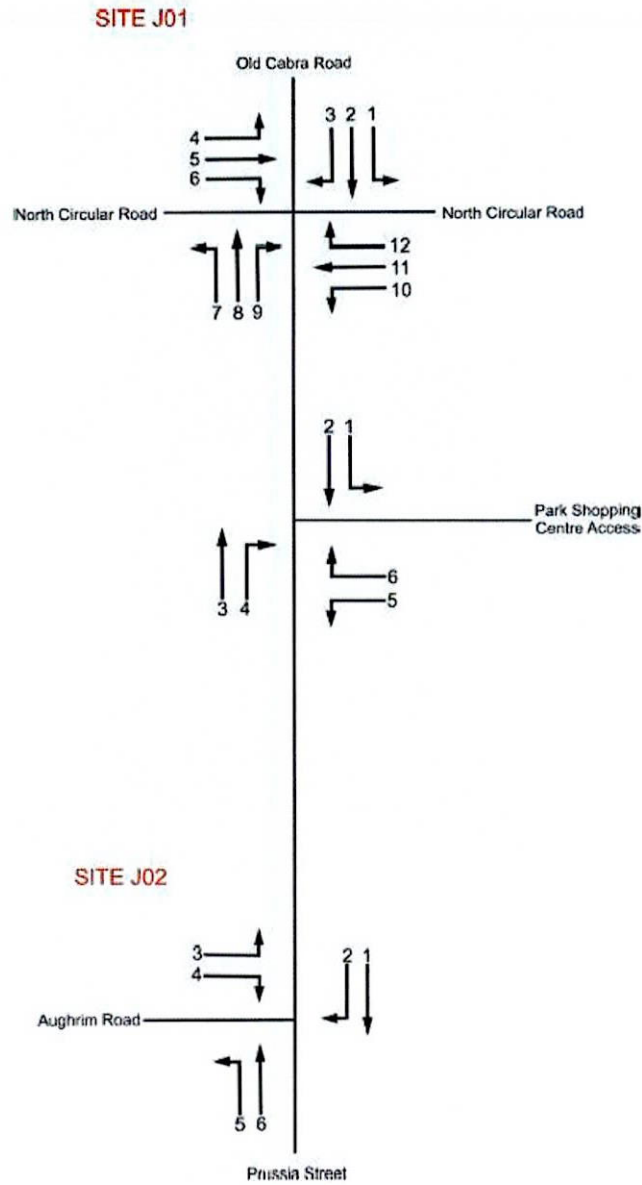


Figure 5 Turning Movements

The traffic flows recorded on Saturday 7th of November 2015 are illustrated in the figure below.

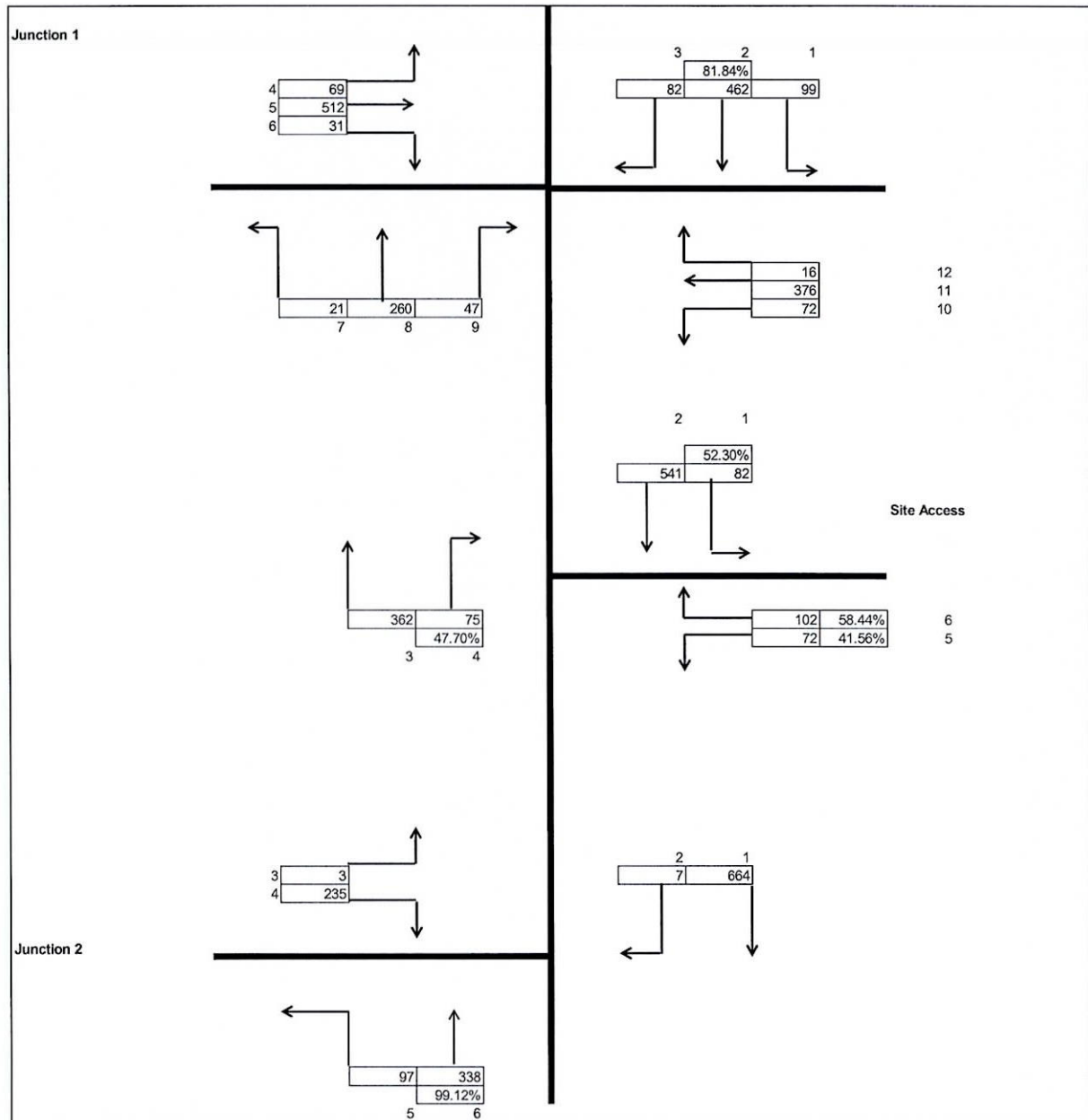


Figure 6 Traffic Flows

Figure 6 illustrates that up to 99% of traffic north bound on Prussia Street originates from Manor Street and 81% of traffic south bound on Prussia Street originates from Old Cabra Road.

It can be seen from the above flow diagram that up to 47.70% of arrivals to Park Shopping Centre come the south and up to 41.56% of traffic exits to the south on Prussia Street.

#### 4. BUS CONNECTS IMPACT

##### Bus Connect Changes

The preferred Blanchardstown to City Centre bus route will introduce bus gates on Old Cabra Road, to the northwest of its junction with the North Circular Road and Prussia Street, and at the junction of Prussia Street and Aughrim Street.

Local traffic only will be permitted through these bus gates with no definition of what constitutes local traffic.

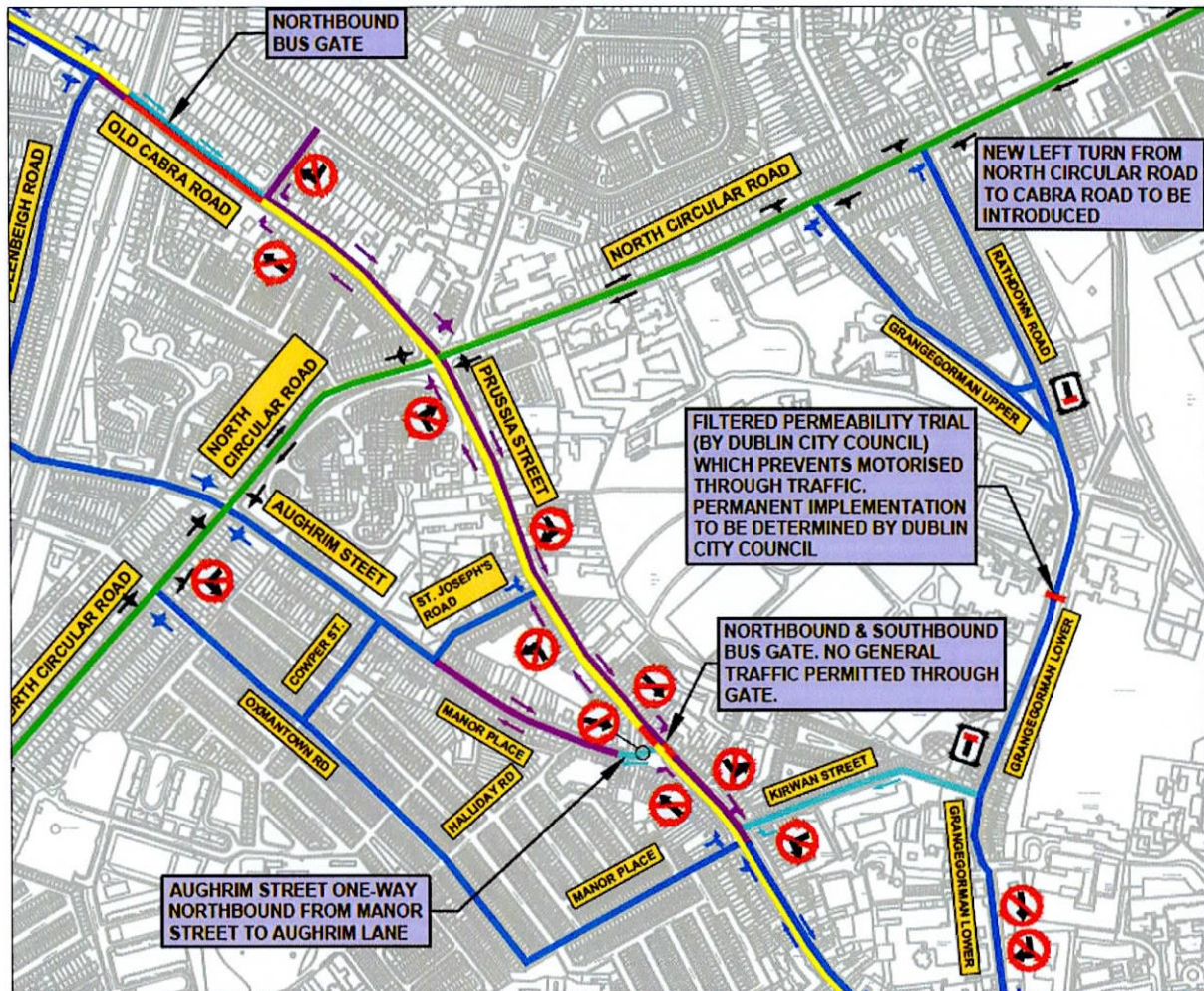


Figure 7 Proposed Local Road Network Changes (Source: Map 36 05 Blanchardstown to City Centre Preferred Route)

### Customer Impact

As noted in Section 3, up to 99% of traffic north bound on Prussia Street originates from Manor Street and 81% of traffic south bound on Prussia Street originates from Old Cabra Road.

The introduction of bus gates on Old Cabra Road and Manor Street will have a significant impact on customer accessibility to Park Shopping Centre.

Ease of access is a key customer metric. A direct route to the destination is preferred. The imposition of bus gates will result in customers using circuitous routes to Park Shopping Centre. A circuitous route is long and complicated rather than simple and direct. This will lead to

customers seeking alternative options. This will impact on the viability of Park Shopping Centre if it is not accessible by car.

### Delivery Impact

Tesco, the anchor tenant, operates a just-in time supply chain.

A just-in-time supply chain is one that moves stock just before it's needed in the supply chain process.

The technique reduces the need to store excessive levels of stock in their bulk store and it works best with direct access over the shortest distance is available.

As well as the positive impact this can have on the local highway network in terms of reduced vehicle activity the use of the 'just in time' system can also have positive impact for businesses in terms of order processing, inventory management and waste management.

Tesco operates fulfilment centres in North Dublin City and County. Currently, a single truck services the Tesco superstore located on the Navan Road and Prussia Street via Old Cabra Road.

The bus gate located on Old Cabra Road will mean that this logistics strategy would no longer be available. Alternative routes have been considered such as servicing via Phibsborough Shopping Centre but there is no capacity on this route.

In addition, and as illustrated below, the introduction of revised junction radii and no right turn from Prussia Street to the North Circular Road, would prohibit servicing via Phibsborough Shopping Centre.

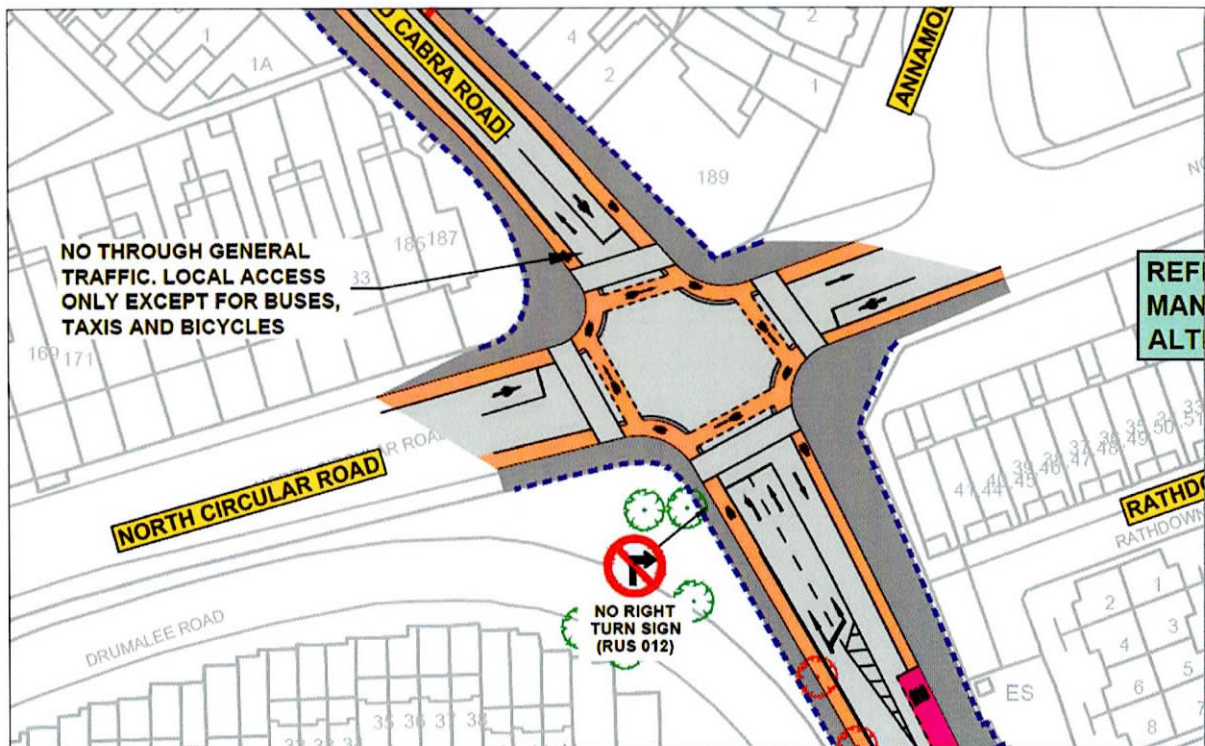


Figure 8 Map 30: Preferred Route

The introduction of the bus gates, revised junction layouts and restricted junction movements will result less efficient deliveries to the development resulting in the following:

- A circuitous route to Park Shopping Centre resulting in longer HGV trips
- Reduced road safety due to longer HGV trips
- Reduced Vulnerable Road User safety due to tighter junction geometry
- Additional HGV trips as just in time delivery may no longer be possible
- Increased environmental impact because of additional HGV trips using circuitous route to Park Shopping Centre

## 5. SUMMARY

The introduction of bus gates at Manor Street and Old Cabra Road will reduced the accessibility for customers traveling to Park Shopping Centre via car and will make servicing more difficult.

Should the Bus Connects measures be implemented, as outlined in the Blanchardstown to City Centre Preferred Route, the long-term sustainability of the centre would come into question as potential customers divert to more accessible locations with fewer servicing options available.



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