Prussia Street Traders (Park
Shopping Centre and Satellite Businesses)
C/O Graham Kelch
Kelchs Newsagents and Deli
Unit 10 Park Shopping Centre
Dublin 7

An Bord Pleanala, (Strategic Infrastructure Division) 64 Marlborough Street, Dublin 1 D01 V902

Our Ref: JC/JK

30th August 2022

Re: Blanchardstown to City Centre Core Bus Corridor Scheme.

Portal ID. 2022112

Competent Authority Reference: ABP-313892 - 22

Location: Blanchardstown to City Centre 10.9km and in particular the Old Cabra Road, Prussia Street, Manor Street, Stoneybatter and environs section thereof.

Dear Sirs,

We enclose for your attention our submission.

The Portal did not allow the filing of multiple documents, so we have filed our submission and observation together with the tabbed documents as a single document.

To address that limitation, we have also/are in the process of filing a hard copy under cover of the original of this letter.

We enclose for your attention cheque for €50 being our fee herein.

Yours Sincerely

Graham Kelch On behalf of Prussia Street Traders (Park Shopping Centre and Satellite Businesses

AN BORD PLEANÁLA LDG. OS 6 730 -

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AN BORD PLENALA

SUBMISSIONS/OBSERVATIONS OF PRUSSIA STREET TRADERS (PARK SHOPPING CENTRE AND SATELLITE BUSINESSES)

DATED THE 30TH AUGUST 2022

In reference to Application of the National Transport Authority, specifically

National Transport Authority

Portal ID

2022112

Competent

An Bord Pleanála

Authority

Competent

ABP-313892-22

Authority

Reference

Applicant

National Transport Authority

Name

Location N3 Jn 3 s'bound off-slip,R121 Blanch'town Rd S,into Blanch'town

> Shopping Centre, N3 from Jn 2,R147,Old Cabra Rd, Prussia St, Manor St.Stoneybattter, Blackhall Pl, Brunswick St N, George's Ln, Queen

St, Blackhall St & King St N.

Description

(Max 256 character)

Blanchardstown to City Centre Core Bus Corridor Scheme which has an overall length of approximately 10.9km including roadworks to facilitate bus, cycling and urban realm improvements along with any associated

ancillary/accomodation works for the scheme.

Date Uploaded 20/6/2022

to Portal

Introduction.

- 1. This Submission/Observation is primarily focused on the section of the proposed bus route from the Old Cabra Road through Prussia Street and Aughrim Street, Manor Street and Stoneybatter, but that concern extends to adjustments made to nearby roads including for example Charleville Road, and Annamoe Road and Terrace.
- 2. The Group making and supporting this submission detailed at the end of this document includes businesses in Park Shopping Centre and some of the businesses on Prussia Street, including City Arms Pub, Lilith, Mad Hatters Café, and Hair Academy and is supported and endorsed by the freehold owners of the Park Shopping Centre.
- 3. The proposed changes in the application represent and are perceived by the business owners to represent an existential threat to their businesses, which all indications are will fail or be severely adversely affected if the application is permitted to proceed in

its current form with the knock-on impact on the sustainability of the surrounding existing development, the retail and service centre and the residential areas it serves.

- This observation and submission also demonstrate the adverse environmental impacts
 which will be caused should the application succeed, principally in terms of increased
 car and noise pollution, and congestion.
- The observations and submissions also address the unnecessary and disproportionate effect of the proposed development.
- We have included at Tab 3 an information sheet provided by Councillor Ray Mc Adam. This is not comprehensive but is a good starting point for a summary of the changes.
- 7. We have also included some prior submissions such as the Submissions of Stoneybatter Pride of Place dated the 16th December 2020 (Tab 6), and, with their consent Submissions of Grants (Manor Street) from the 28th March 2019 (Tab 9), and a resident of 43 Sitric Road Dublin 7, Paddy Pender 8th December 2020. We do not necessarily endorse all the points made therein, or indeed the proposed solutions, but they are helpful in so far as;
 - a. they show from Stoneybatter through Manor Street, commercial and residential they are largely of the same mind as the Park Shopping Centre tenants and landlord and satellite businesses about the problems this scheme will create in terms of damage to business and Sustainability of current development;
 - they show these concerns have been raised on earlier dates, and little or nothing
 has been done to address them in the new plans.

Effect and Stated Purpose of the Application

- The reasons given in the application are to increase the use of public transport and it appears to seek to achieve this by;
 - a. Preventing or deterring car journeys over Prussia Street, Old Cabra Road, Manor Street, Joseph's Road, Aughrim Street, Annamoe Road, Annamoe Terrace and Charleville Road.
 - b. By this means removing their interaction of buses with normal traffic so much as is possible.
- The preventing or deterring of car journeys over the bus routes, Prussia Street, Old Cabra Road, Manor Street, Aughrim Street is proposed to be achieved by;
 - a. Restricting or cutting off access from existing feeding roads and

- Restricting or cutting off access to all secondary roads which might feed traffic into these roads.
- 10. There does not appear to be any proposals to mitigate the effect of the diversion of traffic away from Old Cabra Road, Prussia Street, Aughrim Street and Manor Street or the diversion of traffic from the Mobhi Road, Connaught Road route through to North Circular Road via Annamoe Road, Annamoe Terrace and Charleville Road.
- 11. Prussia Street remains accessible albeit for local use only, however as evident from the Attached Maps in Tab 1 of this Observation/Submission, the journeys to and from Prussia Street are being made so much longer and so complicated as to be unviable.
- 12. Cabra Road customers, choosing to access Prussia Street by bus need to first walk the length of the Cabra Road to Navan Road to get a bus, as there is no other available bus route to bring them to Prussia Street. At any point after Quarry Road on the Cabra Road, the walk to and from Prussia Street becomes shorter than the walk to get a bus. See maps at Tab 1.

13. The implications of this are

- Traffic (other than Buses) to and from existing businesses and residences will be deterred or restricted.
- b. Necessary or unavoidable journeys in vehicles to and from existing businesses and residences will be much longer and slower than currently is the case.
- c. Traffic which previously used this route will be required to use other routes, and in particular routes already suffering from greater traffic congestion than the routes they are being diverted from.
- d. For most of Cabra village and around, the bus is not a viable option, so they are simply cut off without any ameliorating option.

Environmental Effect

- 14. The effects on the environment of the above implications 13 b. (longer necessary or unavoidable journeys) and 12 c. (The diversion of traffic to other routes), will be much greater air and carbon/greenhouse pollution as;
 - a. a new 5.2km home journey pollutes 5.2 times more than a 1km home journey and increases noise pollution 5.2 times; (See map 2),
 - Diverting traffic to already congested routes increases the number of cars stalled in traffic for longer periods, producing more pollution and greenhouse gases.
 - The increases in journey lengths (round trips to and from the Park Shopping Centre as per the attached maps (Tab 1) are;

- Map 1 From 0.75km each way to 3km inwards and 3km outwards. Increase from 1.5km to 6km.
- Map 2 From 1km each way to 3km inwards and 3.5km outwards. Increase from 2km to 6.5km.
- Map 3 From 1.6km each way to 2km inwards and 3.6km outwards. An increase of 3.2km to 5.6km.
- Map 4 From 1km each way to 2.2km inwards and outwards. An increase from 2km to 4.4km
- Map 5 From 1km each way to 1km inwards and 5.2km outwards. An increase from 2km to 6.2km.
- vi. Map 6 From 1km each way to 1.3km inwards and 3.8km outwards. Increase from 2km to 3.8km
- d. This application if implemented increases traffic. An existing round trip to the shops in Map 3, 4 and 6 would become approximately twice the length, in Map 2 and Map 5 three times the length, and Map 1 four times the length. This is the equivalent in each case of doubling, tripling, and quadrupling the number of cars on the roads.
- e. Delivery trucks and other large vehicles will now have longer journeys and will have to negotiate more awkward junctions such as the NCR/Cabra Road junction around Peter's church and the left turn onto Prussia Street.

Failure of Plan to deal with Contingencies

- 15. The National Road Authority, appear to be assuming that if it becomes awkward or difficulty to use a car people will stop using cars and use public transport instead, like daming a river and assuming that the river will find another route.¹
- 16. There does not seem to be any solid basis for this assumption, nor does there seem to be any provision for the possibility that all or a significant proportion will continue to use their cars and find alternative routes.
- 17. For the National Road Authority assumption to be correct, or more accurately for the National Road Authority application to be successful, a sufficient number of car owners have to be persuaded to forgo their cars and travel by public transport. If this does not occur immediately there is no interim means proposed to ameliorate or handle the transition. If it does not occur or does not occur to the degree required there is no plan B. as no provision has been made for the diverted cars.

¹ In paragraph 4 of Paddy Pender's 43 Sitric Road submission (Tab 10) of the 8th December 2020 she says, "....when the consultants were asked where the private motorists were to drive, the answer was water finds its own course."

- 18. Congestion, pollution, and the length of driver's journeys will increase, and businesses will suffer.
- 19. Furthermore, the Pandemic has shown us that there are times, for example where there are risks of contagion, or where there are strikes, that public transport must or does cease to operate and cannot be relied upon.
- 20. There also is the issue, currently getting a lot of media coverage, of Public Transport being currently occasionally unsafe and this development being seen as something that has not yet been resolved.
- 21. There are also certain things you cannot do in a bus which you can do in a car. You cannot do;
 - a. a week's shopping for a family.
 - b. a week's shopping for a couple.
 - c. a day's shopping for a family where you have small children.
 - d. a day's shopping where you have two infant children, one not yet walking.
 - e. A day's shopping if you are infirm in any way.
 - f. a purchase of a sack of potatoes, bail of briquettes, bottle of gas or step ladder or any item which is greater than an easily portable weight or size.
 - g. Attending the Medicus Medical Centre or the physiotherapist if you suffer (or your reason for attending) is mobility issues.
- 22. The current public transport available, even if rendered safe and uncrowded has not solved these problems.
- 23. To residents on and around the Cabra Road west of the Quarry Road, the Park Shopping Centre/Top of Prussia Street is closer than the bus stops. These residents' choices are between the car and walking the same or greater distance to the bus stop or walking to the top of Prussia Street. For these residents in each of the above given examples (a week's shopping for a family etc.) walking either to the bus stop or the top of Prussia Street is not practicable or realistic. Their car remains their only practical choice.
- 24. Considering the Park Shopping Centre/Top of Prussia Street as the centre of an eight-point compass, only the Northwest and Southeast points are served by a bus route to get to and from the centre/Prussia Street. North, South, East, West, Southwest and Northeast are still dependant on cars to getting back and forth and when using cars the applicant proposes they must suffer the longer journeys.

Unnecessary and disproportionate.

- 25. Whereas the parties behind this Submission/Observation will be highly prejudiced should it go ahead, this should not distract from the fact, that the principal difficulty with the changes to Old Cabra Road and Prussia Street and Aughrim Street and Joseph's Road in particular is that they are unnecessary and entirely disproportionate.
- 26. Worse still, Annamoe Road, Annamoe Terrace and Charleville Road, and other minor roads are being radically altered only in the service of the changes to Old Cabra Road, Prussia Street and Aughrim Street.
- 27. Leaving the impact on Environment, Business and Sustainable Development aside for one moment, and approaching the proposal objectively, it is hard to escape the conclusion that the efforts to remove traffic from Old Cabra Road and Prussia Street (and Aughrim Street) are unnecessary and entirely disproportionate as there is not really any problem with Bus Traffic to begin with.
- 28. Furthermore, parking was removed from the west side of Prussia Street and a bicycle lane has been installed on Prussia Street 15 to 20 years ago. Prussia Street has no speed ramps and parking has been severely curtailed and time limited on the east side again 15 to 20 years ago. These measures have been entirely successful, and traffic moves briskly on this road.
- 29. Prussia Street travelling south has free moving traffic. It almost never backs up, and the only thing that can cause it to back up are the pedestrian traffic lights where it joints Manor Street. Very occasionally mostly pre pandemic there would be backed up (meaning a wait for at least two traffic light changes before traffic proceeds) traffic on Prussia Street between 8.30am and 9am if the traffic is slow moving through Manor Street. Parking was largely removed from Prussia Street to accommodate the bicycle lane and achieve this, and it has been achieved.
- 30. Prussia Street travelling northwards will sometimes back up as far as the pedestrian crossing opposite the Shopping Centre at 4.30pm to 5.30pm, but this is attributable to the lights, and the traffic not being able to get through them in the allocated sequence.
- 31. Old Cabra Road is sometimes backed up travelling south between 8am and 9am (meaning a wait for at least two traffic light changes before traffic proceeds). Traffic is almost never backed up going northwards even between 5pm and 6pm where work traffic is at its highest.
- 32. That is the most mystifying aspect of the proposed radical changes proposed, namely that the proposal seeks to make changes to a road that is functioning perfectly for Buses and bicycles and cars.

Mitigation

33. Any remaining perceived problems can be dealt with by much less intrusive structural measures, for example timed bus lanes during pea;, traffic lights sequences, etc.

- 34. Proper planning and development needs an honest balancing of the purpose sought to be achieved and the disruption and damage caused.
- 35. The application is not, or at least should not be approached as the construction of a motorway for buses, but rather as a route which needs to be integrated with existing routes and developments in an urban environment. The Stoneybatter to Old Cabra Road is a 1000 year old village not a blank canvas. ²

Impact on businesses and Sustainable Development in the Area

- 36. The plan seeks to prevent customers from continuing their business habits and shopping habits in Park Shopping Centre and satellite businesses.
- 37. There are four routes from the residential areas in Cabra to Prussia Street at present which are proposed in the application to be cut off, the Old Cabra Road, Annamoe Road, Annamoe Terrace, Charleville Road. It should also be remembered that there is currently no right turn down the North Circular Road from the Phibsborough crossroads, so traffic from Mobhi Road etc turns right at Phibsborough shopping centre, along Connaught Road and then mostly passes across Cabra Road into Prussia Street. All of these routes are being cut off. That traffic is also being diverted into the Cabra Road, North Circular Road Junction.
- 38. The Park Centre includes Tesco Supermarket, Thunders Bakery, Kinsella Mitchell and Associates, Accountants, (Finance House), Kelch's Newsagents and Deli, Sam's Barbers (Submission at Tab 4), Respect Charity Shop, Medicus Medical Centre, Bodyfirm Pilates Studio (includes Physiotherapist) (Submission at Tab 5), Points and Plugs, Park Post Office (includes Social Welfare Office), Park Pharmacy and Chess Chinese Takeaway. It also contains bottle banks and recycling facilities and a car wash.
- 39. There are satellite businesses around Hanlon's corner, including Lidl, Dublin Market Barber and Café (Submission at Tab 4) PH Ross (plumber supplies), two take aways and Hanlon's public house on the Old Cabra Road and slightly further south on Prussia Street, City Arms Public House, the Mad Hatter's Café and Hair Academy (64 to 65 Prussia Street) and directly opposite Lilith Off Licence (31a Prussia Street) (Submission at Tab 7) the same side. Essentially it forms a town centre, a retail and service centre for the surrounding residential area. Sustainable development requires such centres, and equally such centres must themselves be economically sustainable to continue to exist.

 ² As noted in the second paragraph of the submission of Paddy Pender 8th December 2020, this is a 1000 year old village, not a blank canvas.

- 40. The parties outlined in bold above have made their own submissions included here or have included observations and submissions as part of the submission at Tab 2 hereof
- 41. Park House, which houses Tusla and TUD are affected. Their car park is accessible from Annamoe Terrace, which is now proposed by the application to be one way meaning traffic from Cabra Road can no longer access it without travelling round Peter's church and up North Circular Road.
- 42. Stanhope Street School at the end of Manor Street will become much less accessible and will lengthen the journeys of parents who come to collect their Children, including parents with infant children. In the final page of the submission of Jim Grant of Grants 7-8 Manor Street, in paragraph 3 he notes "a Primary School student living on Anamoe Road, on a wet winter morning their parents want to drive them to school. They will have to drive an extra 6km to travel 1km and an extra 2 Km home."
- 43. The Group supporting this submission includes businesses in Park Shopping Centre, Kinsella Mitchell and Associates, a business on Old Cabra Road Dublin Market Barber and Café, and some of the businesses on Prussia Street, including City Arms Pub, Lilith, Mad Hatters Café, and Hair Academy and is supported and endorsed by the freehold owners of the Park Shopping Centre. (See Tab 8).
- 44. Some of these business owners have been canvased to set out the direct impact of the proposed development on their businesses and these concerns are set out in Tab 2 of our submission pages 1 to 3.
- 45. Sam's Barbers and Dublin Market Barber and Café (Submission at Tab 4) have carried out a survey of their customers and this is included at Tab 4 of this submissions.
- 46. Bodyfirm Fitness Studio have included an observation and submission which is typical of the main concerns of all the businesses at Tab 6. The effect of the changes removes accessibility to their current and potential future customers, restricting it to persons living along a particular bus route, which, as they point out is not where most of their customers or clients come from.
- 47. The Park Centre together with the satellite businesses functions for the local residences as town centre, anchored by Tescos, with over 100 parking spaces including disability, parent and child and taxi. In accordance with the definition of sustainable development it is a retail and service centre within walking distance. However, for viability it depends on the passing vehicular trade both on Prussia Street and, of the Anchor Tenant, Tescos.
- 48. In such circumstances, local access is given so that Prussia Street shopping centre can continue to be reached by cars. However, that remaining access is proposed to have been curtailed (as set out above) to such a degree as to have become impractical.

- 49. The proposed changes in the application represent and are perceived by the business owners to represent an existential threat to their businesses, (See Tab 2, Tab 4, Tab 7 and Tab 8) which all indications are will fail or be severely prejudiced if the application is permitted to proceed in its current form.
- 50. The proposed changes are adverse to the sustainable development of the area.

Customer Position.

51. As a test of the customer's reaction to these changes from Tuesday the 23rd August to Monday the 29th August Kelch's Newsagent and the Post Office asked their customers if they objected to the making of Prussia Street local access only and if so to sign the attached petition and give their address so this might be included in our observations and submissions. Over a one-week period, 295 of their customer signed to signify their objection. A copy of these signatures and addresses are at Tab 11.

Documents submitted in support of these submissions.

- 52. We refer you to the following supporting Submissions and Observations and the earlier Submissions of other parties included for reference;
- 53. Tab 1 Maps 1 to 6 and Index of Maps 1 to 6 including description of 6 current routes and impact of changes thereon.
- Tab 2. Supporting Submissions and Observations Prussia Street Traders (Park Shopping Centre and satellite businesses).
- 55. Tab 3 Information Sheet provided by Ray Mc Adam from Fine Gael in respect of changes describing changes to roads.
- 56. Tab 4. Supporting Submission and Observation of Sam Donnelly proprietor of a) Sam's Barber Park Shopping Centre, Prussia Street Dublin 7 and (b) Dublin Market Barbers and Café 12/32 Lidl Old Cabra Road
- 57. Tab 5. Supporting Submissions and Observations of Emma Mc Carthy, proprietor of Bodyfirm Ltd.
- 58. Tab 6 For reference, Stoneybatter Pride of Place submission of the 16th December 2020.
- 59. Tab 7 Supporting Submissions and Observations of Sophie Robson, owner and proprietor of Lilith Off License, 31a Prussia Street, Dublin 7
- 60. Tab 8 Supporting Submissions and Observations of David Higgins, Property Manager on behalf of Bridlegrand Ltd, Commercial landlord of Park Shopping Centre, Prussia Street, Dublin 7.
- 61. Tab 9 For reference, Submissions (3 pages) from Grants Uniforms, 7-8 Manor Street dated the 28th March 2019 together with submissions (2 pages) from Jim Grant.

62. Tab 10 For reference, Submissions (2 pages) from Paddy Pender of 43 Sitric Road, Dublin 7

Parties making Submission and Observationss

This observation and submission is made by and on behalf of the following;

Name of Observers	Owner/Proprietor	Addresses
Prussia Street Post Office	Sandra Madagan	Unit 8, Park Shopping Centre. D7
Medicus Medical Centre	Thomas Lotocki	Unit 1 - 3, Park Shopping Centre. D7
Park Pharmacy	Peter Wong	Unit 2, Park Shopping Centre. D7
Kelchs Newsagents	Graham Kelch	Unit 10, Park Shopping Centre. D7
Body Firm Studios	Emma McCarthy	Unit 14, Park Shopping Centre. D7
Sams Barbers	Sam Donnelly	Park SC, Prussia St, Dublin 7
Finance House Kinsella Mitchell	John Kinsella	46 Prussia Street. D7
Clarkes City Arms Public House	Vincent Clarke	55 Prussia Street. D7
The Mad Hatter Café	Roxanna Preida	62/63 Prussia Street. D7
Chess Takeaway	Moanne	35-39 Prussia Street. D7
Hair Academy	Sharon Armstrong	64/65 Prussia Street. D7
Lilith Off-licence	Sophie Robson	31A Prussia Street, Dublin 7
Park Shopping Centre Ltd and Mankato Ltd	Eugene Murray	Park SC, Prussia St, Dublin 7

Colour index

Green – Current Route
Pink – New Proposed Route in Direction to Prussia St
Yellow – New Proposed Return Route Exiting Prussia St
Red – Current Access Roads that will be Blocked in New Proposals

Map 1 – Shows current main routes that will be blocked in direction of Prussia Street

- Complete Removal of ALL Access Routes To and From Cabra Area: As you can see from this map the 4 current routes from Cabra into Prussia Street (Old Cabra Road, Annamoe Road, Annamoe Terrace, Charleville Road) will all be closed and redirected into Phibsborough
- The proposed bus corridor at Blackhall place diverts traffic, traffic is again diverted at Manor Street, buses straight ahead only. This again increases journey distance and time.

Map 2 - Cabra Area to Prussia Street and Return Journey

Current route from Quarry Road to Prussia St is 1km. New Proposed Route all sent into Phibsborough as Annamoe Road, and Terrace blocked along with Charleville Road. New route would be 3km. Return journey would see no right turn onto NCR to use the one-way road Annamoe Terrace. Also no straight ahead onto Old Cabra Road. Customer will be sent on a 4km Journey left onto NCR, right onto Blackhorse Ave, right onto Skreen Road, back onto Navan Road and continue onto the Cabra Road.

Map 3 – Smithfield to Prussia Street and Return Journey

New plan will see traffic sent in a circle around North King Street, Georges Lane and North Brunswick Street to get back onto Stoneybatter due to a Bus Corridor on Blackhall Place. Customers will then be Blocked again at entrance to Prussia Street and sent left onto Aughrim Street. Again, no justification as Prussia St and Blackhall Place do not have traffic congestion

Return Journey will see customers not allowed through Prussia Street on a direct route home to Smithfield. Instead, they will be sent left onto NCR, down Infirmary Road, Parkgate St, Up the North Quays, Left onto Church St and back into Smithfield in a 4km journey in already congested areas.

$\label{lem:map 4-Arbour Hill / Montpellier to Prussia Street and Return \\ \textbf{Journey}$

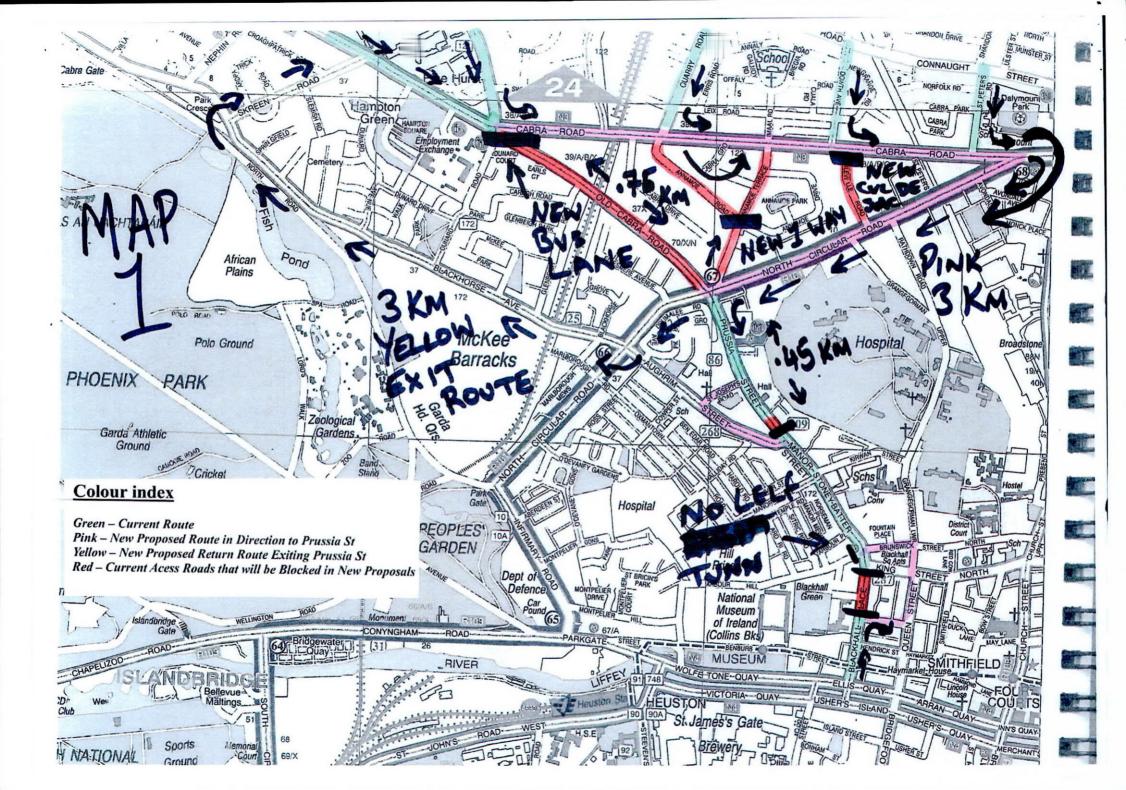
- Current route direct through left onto Stoneybatter/Manor Street into Prussia Street is approximately 1km. Proposed routes through Infirmary Road and North Circular Road is approximately 2.5km, this is due to removal of left turn off Arbour Hill onto Stoneybatter.
 - Infrastructure and Pedestrian Concerns: extremely narrow roads in a residential area of Stoneybatter raises great concerns for pedestrians and residents with the infrastructure of the roads themselves being a deterrent for use.

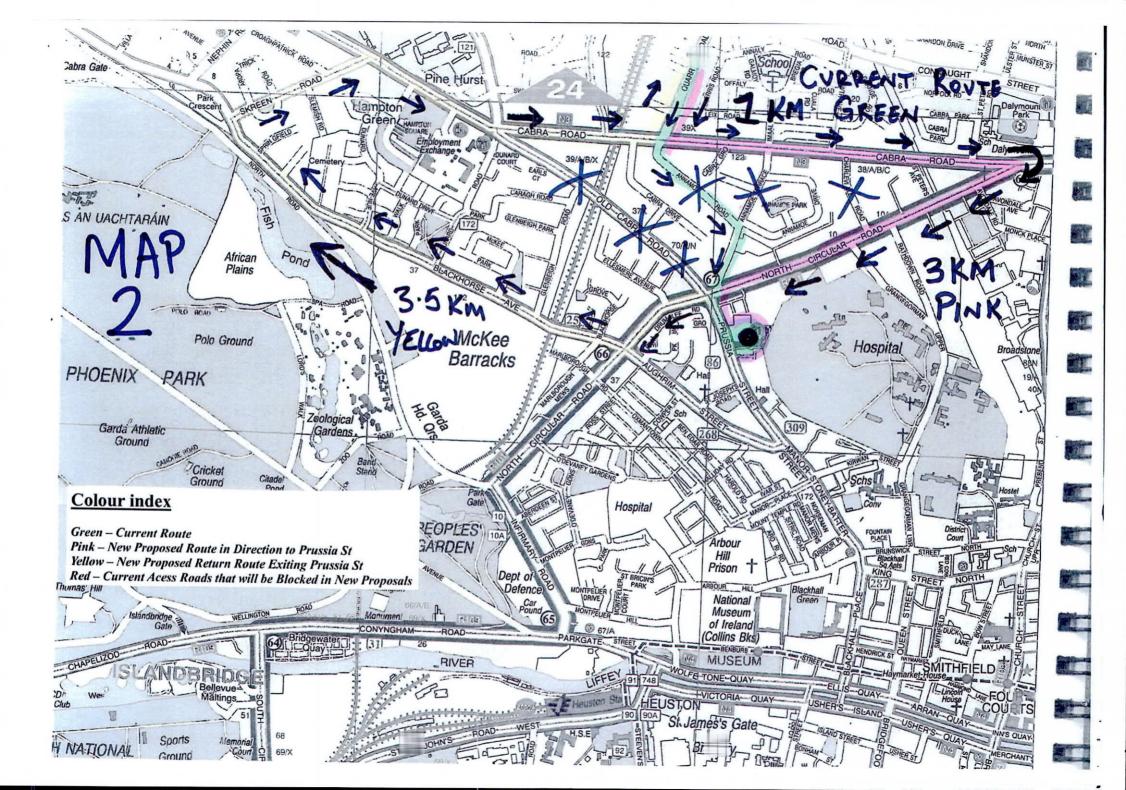
Map 5 - Rathdown Road to Prussia and Return Journey

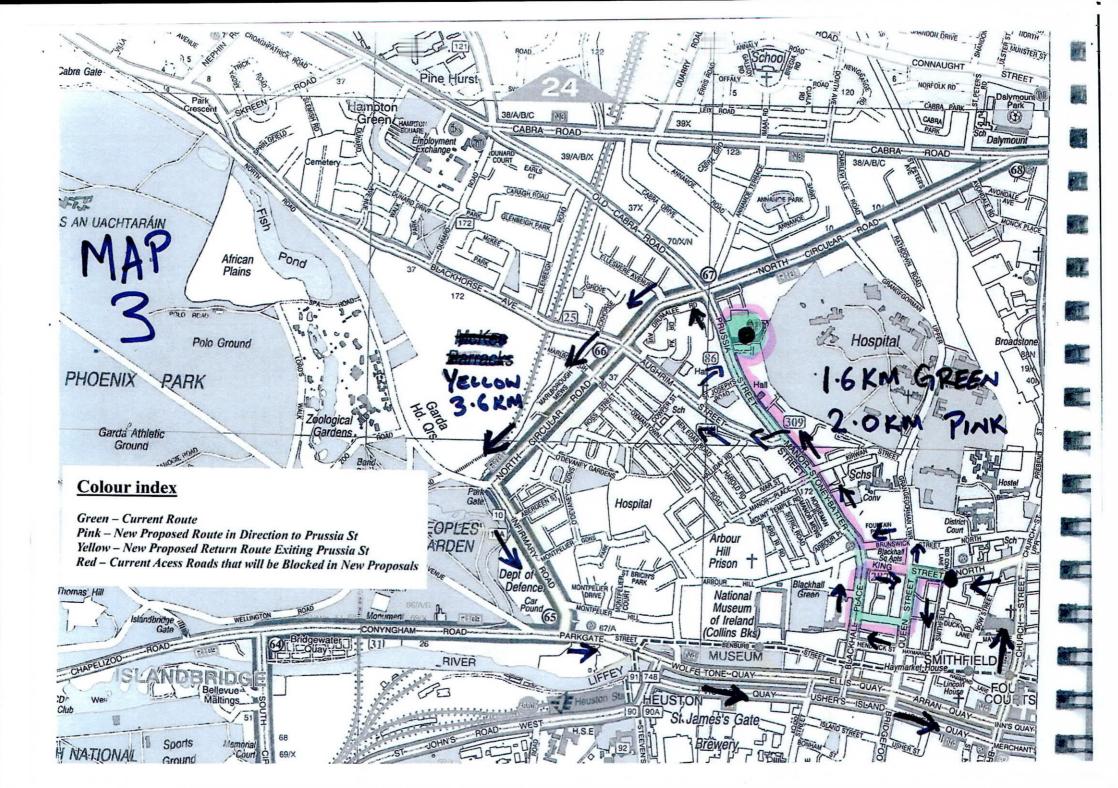
Current route is approximately 1 km, no change for journey to Prussia St but Return journey would see no right turn onto NCR and no straight ahead onto Old Cabra Road. Customer will be sent on a 4km Journey left onto NCR, right onto Blackhorse Ave, right onto Skreen Road, back onto Navan Road and continue onto the Cabra Road and into Phibsborough to then commute back onto the NCR and left into Rathdown

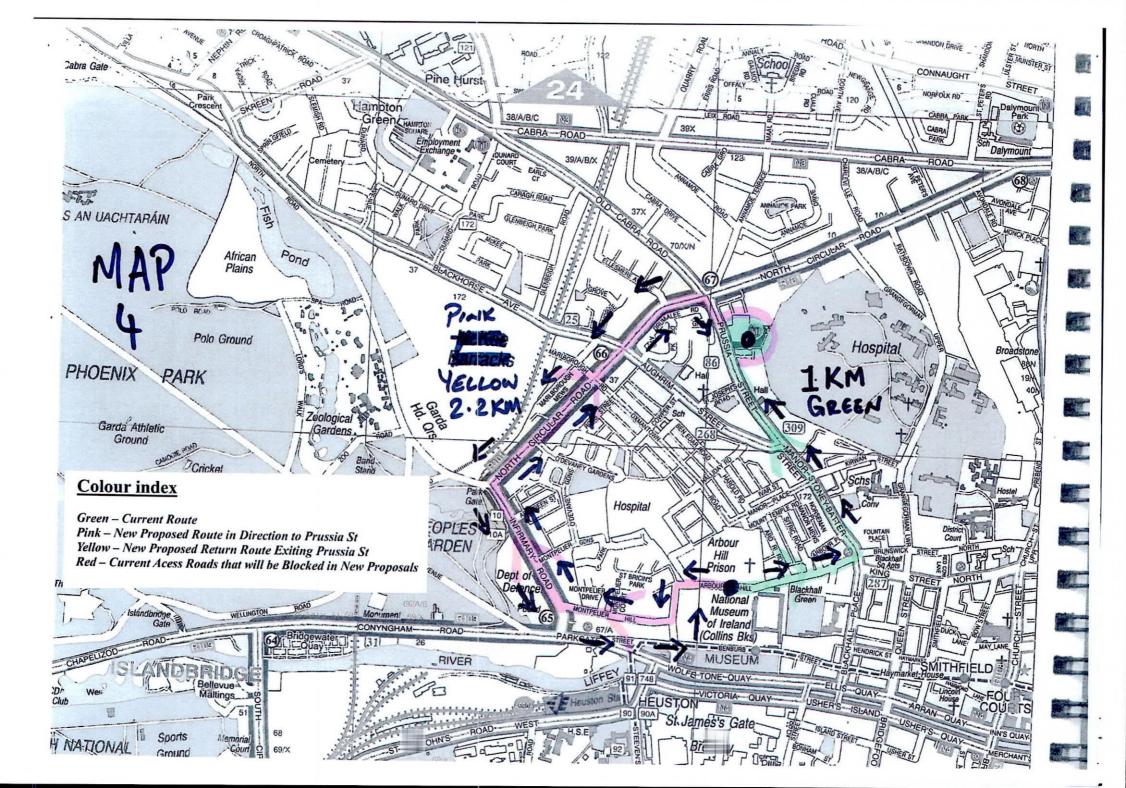
Map 6 – Grangegorman Lower to Prussia Street and Return Journey

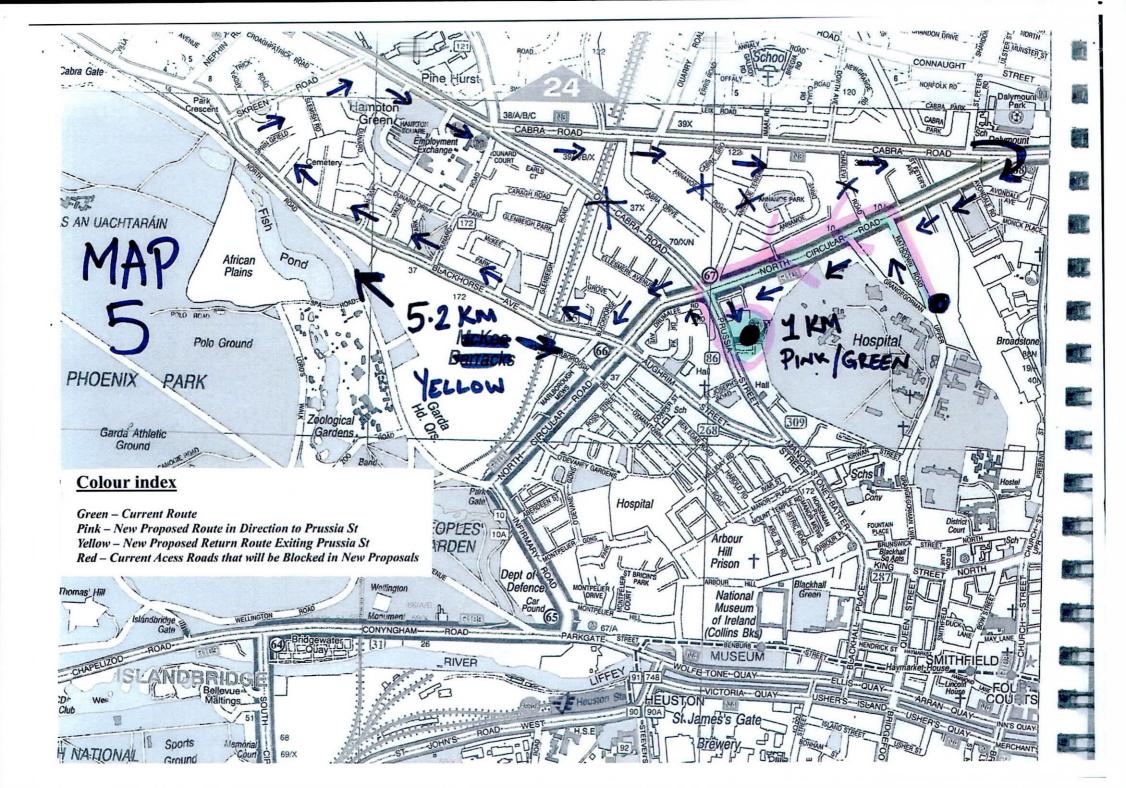
Current route approximately 1 km on direct route Kirwan Street and right onto Manor Street and into Prussia Street. New route will see Traffic diverted left onto Aughrim Street. New Return route will see customers not allowed through Prussia Street on a direct route home to Grangegorman. Instead, they will be sent left onto NCR, down Infirmary Road, Parkgate St, Up the North Quays, left into Blackhall Place, right onto North Kings Street, left onto Georges Lane and finally back to Grangegorman in a 4.5km journey

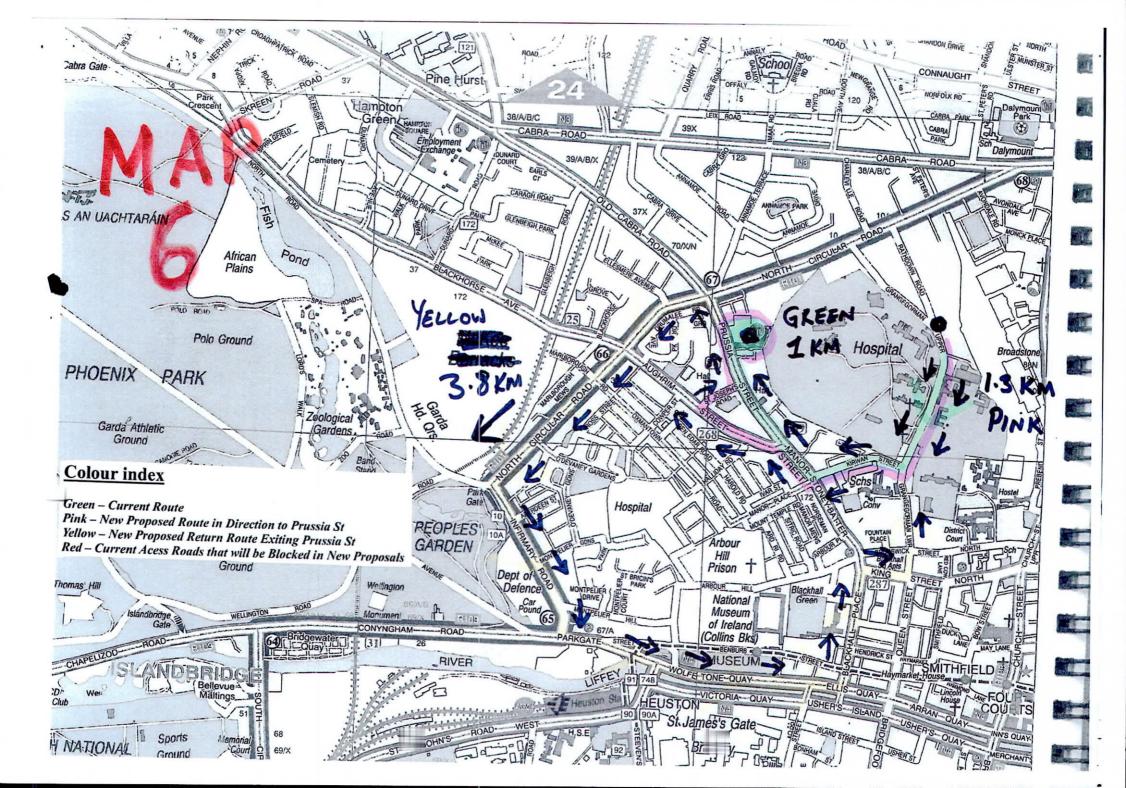












Submissions and Observations Prussia Street Traders (Park Shopping Centre and satellite businesses).

On Blanchardstown to City Centre Core Bus Corridor Scheme

Introduction

Prussia Street is a local hub for shopping, services and socialising for the surrounding areas of Cabra and Navan road to the North, Stoneybatter, Manor Street, Montpellier and Arbour Hill to the South, O'Devaney Gardens to the West and Grangegorman to the East. Situated in the centre of Prussia Street lies the Park Shopping Centre, with ample parking for customers and clients of the surrounding businesses. The fundamental success to Prussia street and to Park Shopping Centre is that it is located in the centre of all the above areas.

Prussia Streets success is built on passing trade along with customers from all generations who use Park Shopping Centre for doing there weekly shop, collections of Pensions/Disability Allowances etc, attending meetings and socialising in Public Houses/Cafes. Prussia Street is a main artery from the Navan Road into the City Centre which is key to its growth and stability in the years since it has opened in the 1980's, and has never had an issue with Traffic Congestion. Customers at present can easily access Prussia Street due to its huge Car Park facilitating Customers with Disabilities, Businesses dropping off large postal orders, Collecting and dropping off Eldery.

The new proposals would see Prussia Street isolated by the North, South, East and West, absolutely devastating a hub of the local community along with Business owners life's work in a disproportionate manner due to there being no justifiable reasoning based on traffic congestion.

The Old Cabra Road entrance from the Navan Road will act as a total blockade of our current customer base and passing trade as it is proposed to be a bus corridor. The Old Cabra Road is the gate way into Prussia Street whereby our customers commute to us at ease. The entire area of Cabra with a population of 22 thousand would be totally isolated from accessing Prussia Street without having to do a 3km bottleneck route into Phisborough and back out to Prussia Street.

Prussia Streets north entrance would be designated a 'Local Access Only' road acting as a deterrent to regular Customers/Clients while totally discimating passing trade. Prussia Streets South entrance in the new proposed plans would be totally blocked with bus corridor only allowed straight through. At present customers can turn left from Arbour Hill and Manor Place onto Manor Street/Stoneybatter on a direct route into Prussia Street, the new proposed plans would see no left turns allowed, again isolating our southern customer base.

Main concerns by Business Owners

Park Shopping Centre

- Detrimental to Commercial Tenants business in which the Landlord leases.
- Detrimental to the future leasing / licensing of vacant units and attracting new commercial



tenants.

- Depreciation of the development capital value in future sale.
- Potential Current Tenants seeking to break their current leases and vacate there units.

Post Office/Prussia Street

- Staffs commute to work from Cabra, Ballymun, Finglas and Clonee due to new proposed routes.
- Accessibility for Eldery/Disabled accessing the Post Office to collect payments whom rely on Family Members/Friends to drop them and collect them.
- A lot of companies and offices use Post Office to send post and parcels due to the car parking on site.
- No post office on Park Gate Street or Ormand Quay anymore so all Arbour Hill, Montpellier, Smithfield and surrounding areas rely on this location.

Medicus Medical Centre

- Accessibility to Park Shopping Centre for patients
- Patients expected to travel by public transport with no direct bus route from Cabra to Prussia Street.

Park Pharmacy

- Accessibility for Customers to collect prescriptions.
- Loss of Customer base to Maple centre/Phisbourough, where parking is limited.

City Arms Public House

- Dropping off/ Picking up Eldery Customers who socialise within the Public House.
- Accessibility of Prussia Street for delivery vehicles E.g designated times which is not feasable.

Finance House

- Impact on Clients accessibility to attend meetings.
- Passing trade at a loss.

The Mad Hatter Cafe

- Passing trade at a loss.
- —Builders, trademens and Reps no longer using Prussia Street as a route discimating breakfast, lunch and Dinner trade.

BodyFirm Studios

- Clients accessibility to the Studios.
- Many clients with hectic schedules attend studios and classes before/during and after work who would use Park Shopping Centre for their ample parking facilities.
- Rerouting and 'Local Access Only' acting as a deterrent would only cause gridlock on already congested side roads along with Phisborough.
- New bus route is not an option as it only serves one route which is very few of our clients. Clients would have to live on the route to have use for it.
- Staff also impacted on new route, adding many kms and stress to their daily commute, again no bus route option.
- No benefit of new proposal for Staff or Clients and business unlikely to survive due to this.

Kelchs Newsagents and Deli

- Passing trade non existent in new proposed plans.
- No accessibility from north, south, east or west.
- Local Access Only acting as a deterrent
- Old Cabra Road Bus Corridor strangling Prussia Street
- Huge customers base from Cabra with no accessibile route from car or no direct bus route having huge impact on customers and Eldery
- Breakfast, lunch trade from builders, trademens from O'Deveany garden sites, Grangegorman sites along with passing trade who drive will have no accessibile route.
- Deliveries
- Proposals will result in staff layoffs and possible full closure.

Technicals

Northern customer base - Cabra and Navan Road.

Access Roads at present - Old Cabra Road, Annamoe Terrace, Annamoe Road and Charville Road

- Old Cabra Road which is the main artery into Prussia Street to be turned into a Bus Corridor.
- Anamore Road/Anamore Terrace currently facilitates customers coming from Cabra into Prussia street. New proposals would see Anamoe Terrace turned into one way, back out to Cabra Road in the opposite direction to Prussia street. This change will also see Customers leaving Park Shopping Centre been unable to use Anamore Road Back to Cabra as Customers would be forced left only on North Circular Road towards Phoenix Park.
- Charville Road at present is two way linking Cabra Road to North Circular Road. The new proposal would see Charville Road turned into a cul de sac facilitating bikes only for through access.
- All Navan Road/Cabra Customers will be redirected up Cabra Road into Phisborough bottleneck to U turn back down the north circular road in a 3km route.
- -Left and right turn onto Prussia Street off North Circular Road to be 'Local Access Only' acting as deterrent to all traffic. Also Aughrim Street left and right off the North Circular Road to be 'Local Access Only' acting as a deterrent.
- -Exit Route from Park Shopping Centre, no right turn allowed on North Circular Road, no straight ahead allowed onto the Old Cabra Road 'Local Access Only'. Diverting customers left in total opposite direction to their end point Navan Road/Cabra sending them on a 4km journey up Blackhorse Avenue to Skreen Road and back into the Navan Road and up The Cabra Road.

Southern Customer Base – Stoneybatter, Manor Street, Arbour Hill, Montpellier and Parkgate Street

Access Roads at present - Blackhall Place, Arbour Hill, Stoneybatter, Arbour Place

2

- Bus corridor into Prussia Street only, diverting normal traffic left only onto Aughrim street.
- Currently left turns allowed from Manor Place, Arbour Place and Arbour Hill Road onto Stoneybatter/ Manor Street allowing a direct route to Prussia street. New proposal will see left turn bans on Manor Place, Arbour Place and Arbour Hill Road with right turn only. This will force all Arbour hill and Montpellier Customers South towards the Quays.
- Blackhall Place to be turned into Bus Corridor diverting customers in a circle right onto North King Street, left on Georges Lane, left again onto North Brunswick Street to get back into Stoneybatter. At present traffic moves freely up and down with no traffic congestion.
- -New Plans will see heavily residential narrow roads within Stoneybatter as the main routes as all main roads will be blocked by turn bans, Bus Corridors and Local Access Only. These roads are extremely narrow, crowded and will cause major safety risks to the residence and local community. Traffic will be required to zig zag through these roads to reach Park Shopping Centre with Alternative road been back out onto the Quays, up to Heuston, back over the Quays onto Park Gate Street, up Infirmary Road, onto the North Circular Road and then into Prussia Street for Local Access Only.

Conclusion

Having reviewed the new proposed plans it is quite evident that a thriving Prussia Street at present for the local community will turn into lifeless ghost town. It will most defiantly result in job losses, and closures of successful businesses whom have serviced the local area for over 40 years. It is clear that these proposed plans would be totally disproportionate in the needs of a Bus Connect Corridor which would only service the needs of people whom live on the route from Bianchardstown to City Centre. While I understand the need for public transport infrastructure there is no justifiable reason for isolating Prussia street which is not a congested area. The new proposed Bus Corridor will only facilitate one direct bus route from Blanchardstown into the City with no benefit to staff, customers and clients. It's extremely evident from the proposed plans that all main streets and side roads would see Prussia street isolated due to the implemation of Bus Corridors, Local Access Only Roads and new left and right bans deterring all traffic North, South, East and West from commuting to Prussia street.

PLANNING APPLICATION LODGED FOR BUSCONNECTS BLANCHARDSTOWN BUS CORRIDOR - August 2022

Dear Neighbour,

The National Transport Authority lodged the planning application and accompanying documentation with An Bord Pleanála on June 30th last for the proposed Blanchardstown Bus Corridor. This leaflet is designed to brief you on the likely impact of the scheme on the Dublin 7 area, the planning process being applied and how you can have your say. Full details of the application are online at www.Blanchardstownscheme.ie.

WHAT IS THE BLANCHARDSTOWN CORE BUS CORRIDOR?

possed Blanchardstown to City Centre Core Bus Corridor Scheme is 10.9km long and will provide enhanced bus priority measures for string and all future services who will use the corridor. The Proposed Scheme proceeds along the R121 Blanchardstown Road South into the Blanchardstown Shopping Centre, along N3 Navan Road as far as the junction with the Old Cabra Road. From here, the Proposed Scheme will be routed along Old Cabra Road, Prussia Street, Manor Street and Stoneybatter to the junction with King Street North. The Proposed Scheme will proceed via Blackhall Place as far as the junction with Ellis Quay, where it will join the prevailing traffic management regime on the North Quays. At the Stoneybatter / Brunswick Street North junction, cyclists proceed along Brunswick Street North, George's Lane and Queen Street as far as Ellis Quay/Arran Quay.

WHAT IS THE PLANNING PROCESS BEING UTILISIED FOR THIS APPLICATION?

On June 30th last, the National Transport Authority lodged its planning application to An Bord Pleanála for the Blanchardstown Core Bus Corridor under Section 51(2) of the Roads Act 1993 (as amended). This process allows for the public make submissions on the application. Those submissions may be made in writing to the Board at An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902 until 5.30pm on Tuesday 30th August 2022. Any submissions/observations must be accompanied by a fee of €50. It is also possible to submit an observation online via the An Bord Pleanála website at https://online.pleanala.ie/en-ie/sid/observation.

WHAT DOES THE PROPOSED BLANCHARDSTOWN CORE BUS CORRIDOR MEAN FOR DUBLIN 7?

Significant traffic management changes are proposed as part of the Blanchardstown Core Bus Corridor. I have summarised them to the best of my ability. More detailed information on these changes and other matters are available at www.blanchardstownscheme.ie.

ABRA ROAD:

No through traffic in the southbound direction from the Old Cabra Road junction with Navan Road, except for buses, taxis and cyclists, which precludes general traffic from Navan Road travelling to Stoneybatter along Old Cabra Road.

No through traffic in the northbound direction except for buses, taxis and cyclists, due to proposed introduction of a Bus Gate at the
railway overbridge on the Old Cabra Road, which precludes general traffic from Stoneybatter and the North Circular Road from
travelling along Old Cabra Road through to Navan Road. Local traffic in the northbound direction will have access as far as the Bus
Gate.

On PRUSSIA STREET, between North Circular Road and the entrance to the Park Shopping Centre, the Proposed Scheme will provide:

- One southbound general traffic lane.
- One northbound 'straight-ahead only' lane for local traffic, taxis and buses travelling to Old Cabra Road.
- One left turn lane from Prussia Street to North Circular Road.
- Right turn movement from Prussia Street to North Circular Road will be removed.
- A new signalised junction to be provided at Prussia Street and the North Circular Road to provide separate crossing facilities for cyclists
 and pedestrians, and to ban right turns from Prussia Street to minimise delay to buses travelling straight ahead (to Old Cabra Road).
- Along Prussia Street, a traffic lane will be provided in both directions, carrying buses and local traffic only. St Joseph's Road will be modified to include a one-way section at its eastern end (i.e., one-way in an eastbound direction). This will restrict traffic using St Joseph's Road as a means of avoiding the Bus Gate at Prussia Street / Manor Street junction.
- A short section of southbound cycle track will be provided on Prussia Street from its junction with North Circular Road before cyclists' merge with general traffic just north of Park Shopping Centre. In the northbound direction, the cycle track will commence approximately 50m south of the junction with St Joseph's Road.

At the junction of MANOR STREET / PRUSSIA STREET with Aughrim Street, the following is proposed:

Ray McAdam | City Councillor - North Inner City

PLEASE TURN OVER →

Fine Gael Leader Dublin City Council | Chair Planning & Urban Form SPC City Halt Dublin 2

1 086 847 1720 1 raymoadam@gmail.com 1 Councilior Ray Mc Agam 2 @Ray McAdam

- A Bus Gate will be located on Prussia Street just north of Aughrim Street junction, requiring all northbound general traffic to turn left onto Aughrim Street.
- In the southbound direction, a Bus Gate will be located on Prussia Street / Manor Street just south of the Aughrim Street junction requiring general traffic travelling southbound on Prussia Street to turn right onto Aughrim Street.
- The loading bay outside Kavanagh's Public house will be retained.
- A new signal-controlled cycle crossing be installed, along with urban realm improvements at this junction, which will include raised carriageway paving (i.e., raised table) to assist pedestrians crossing.
- The junction will include a southbound Bus Gate on Aughrim Street, preventing any general traffic from travelling from Aughrim Street - Opportour Road

South of the Aughrim Street junction with Manor Street and Prussia Street:

- Traffic signal controls will be included at the Manor Street / Kirwan Street / Manor Place staggered junction.
- The signal-controlled junction also includes a pedestrian crossing of Manor Street.
- Movements out of Kirwan Street will be restricted to left turn only, which will remain one-way as is currently the case.
- At the junction with Manor Street, Manor Place will be altered to a one-way street (i.e., one-way eastbound towards Manor Street), to limit use of Manor Place and Oxmantown Road by through traffic.

MANOR STREET & STONEYBATTER:

- Two general traffic lanes and a cycle track in both directions are provided to the junction with Brunswick Street North.
- Protected parking bays on both sides of the road, and two loading bays are included.
- A southbound general traffic lane will be provided along Stoneybatter between Brunswick Street North and King Street North, with general traffic being required to turn left into King Street North as a result of a southbound Bus Gate at Blackhall Place / King Street North junction. Bus services will continue travelling straight ahead along a southbound bus lane on Blackhall Place. This match current situation.

BLACKHALL PLACE:

- In the northbound direction on Blackhall Place, a bus lane and a single general traffic lane, as far as the junction with King Street North is proposed.
- Northbound general traffic wishing to progress onto Manor Street will turn right onto King Street North (which will remain one-way eastbound), and then turn left onto George's Lane to travel westbound along Brunswick Street North.
- The Proposed Scheme will include signal-controlled priority for northbound buses at the Stoneybatter / Brunswick Street North junction.
- The Proposed Scheme will provide a cycle track in each direction along Brunswick Street North.
- On Blackhall Place between Blackhall Street and Arran Quay, the carriageway arrangement will consist of a bus lane and general traffic lane in each direction.

ARBOUR HILL:

- The Proposed Scheme will allow for general traffic exiting Arbour Hill to turn right only at the Stoneybatter junction.
- General traffic into Arbour Hill will be from Manor Street direction or Brunswick Street North only.
- On BLACKHALL STREET, the road layout will be revised to include one lane for general traffic, a two-way cycle track, and angled parking.
- GEORGE'S LANE will have one northbound general traffic lane, with proposed new signal controls at the junction of Grangegorman Street Lower and Brunswick Street North.
- Westbound general traffic from the City Centre on the eastern section of King Street North (east of George's Lane) will be rest d to left turns only, into Queen Street.

- The Proposed Scheme will provide two southbound general traffic lanes.
- From King Street North, the layout will reduce to one southbound general traffic lane from Blackhall Street to Ellis Quay / Arran Quay.
- The Proposed Scheme will provide a two-way cycle track on the eastern side of Queen Street from King Street North to Ellis Quay / Arran Quay.

Other proposed changes:

- Traffic management measures such as one-way streets and / or turn bans will be required to minimise traffic impacts on side roads due to diverted traffic (which may occur due to the priority given on the Proposed Scheme to pedestrians, cyclists and buses).
- A short one-way northbound section will be required on Annamoe Road at its junction with Annamoe Terrace and on Charleville Road at its junction with North Circular Road.
- No access is proposed from Phibsborough Road onto Phibsborough and Monck Place, along with the introduction of right turn bans onto Phibsborough Road.
- A short one-way southbound section is also proposed at the northern end of Cowper Street, with Aughrim Place becoming one-way southbound. There is also a short one-way westbound section at the western end of Swilly Road.

FURTHER INFORMATION:

I hope this information is of assistance to you, but should you have any further questions or queries arising from the BusConnects planning application, please email me at RayMcAdam@gmail.com. Remember, the best way for you to have your say on this application is by making a submission to An Bord Pleanála before 5.30pm on Tuesday August 30th next.

Ray Mcadam

Submissions and Observations of Sam Donnelly Proprietor of (a) Sam's Barber Park Shopping Centre, Prussia Street Dublin 7 and (b) Dublin Market Barbers and Café 12/32 Lidl Old Cabra Road supporting Prussia Street Traders (Park Shopping Centre and satellite businesses)
On Blanchardstown to City Centre Core Bus Corridor Scheme

To whom it may concern,

This paper estimates the impact of the new road infrastructure proposed by the Government project changing Navan, Old Cabra Road and Castleknock Road link schemes on the profitability and employment of the businesses existing in the area, specifically Dublin Market Barbers and Café, at 12/32 Lidl Old Cabra Road, and Sam's Barbers, at Tesco Prussia Street.

During the month of August we have run a research, asking and taking notes from our own consumers about how the potential changes could impact their decision when booking their next haircut. Our findings can be seen bellow:

- People who went to our shops for hair services and/or coffee/food: 923
- Revenue Month to date (August): €11550
- People answered the guestionary: 557
- People who said they are mostly likely to change: 72.1%
- People who said they may change if the changes are made: 14.5%
- People who said it would not impact their decision: 5.9%
- People who answered vaguely: 7.5%

The previous statistics show that we would mostly likely lose approximately 72.1% of our businesses with the changes proposed. Almost 70% of our businesses come from Navan Road, Castleknock, and Cabra areas, our customers being mostly family people who drive to get to their jobs, the supermarket, and normally prefer places that will offer them a good structure. That means they would probably change the place where they get their hair done in order to avoid unnecessary impact, resulting in a decrease in our revenue that it would make it impossible to keep the business running.

Last year from August to December our businesses on the mentioned area had a sales count of 8,340 individual transactions, resulting on 102.37K in revenue. Using this as a starting point, we predict that we will lose approximately 240K in a year's time if we close.

It would also impact our staff, 8 people between baristas and barbers, who have family, bills, and pay their taxes who would be unemployed if we reach a worst case scenario.

* We hope that this information would be taken into account when deciding about this changes.

Sincerely

Sam's Barbers and Dublin Market Barbers Director

Sam Donnelly sam@samsbarbers.com

+353 86 245 4795

<u>Submissions and Observations of Emma Mc Carthy, proprietor of</u> <u>Bodyfirm Ltd supporting Prussia Street Traders (Park Shopping Centre and satellite businesses)</u>

On Blanchardstown to City Centre Core Bus Corridor Scheme

Emma McCarthy

Bodyfirm Ltd,

Unit 14, Level 1

Park Shopping Centre,

Prussia St,

Dublin 7

Concerns: Closing roads to traffic will mean that clients can no longer access the shopping centre car park with ease. This will deter people from coming to the studio and have a huge negative impact on not only my business but all of the businesses in the centre. Clients travel by car to the studio and access to the car park is necessary for the running of my business. Road closures and rerouting traffic will cause grid lock on already very congested side roads as well as on the North Circular Rd. Using the new bus route is not an option as it serves one route which very few of my clients would live on or have a use for.

As the owner of Bodyfirm both me and several of my staff will also be impacted as we drive to the studio- a journey that is already stressful and largely involves stationary traffic. There is no public transport option for us.

While I understand the need for public transport infrastructure the roads cannot be closed to traffic until this is properly in place across the whole city, not for one route. There are no benefits to me, my staff or my clients from this plan and the business would be unlikely to survive.



E. Stoneyhatterpop@gmail.com. W. www.stoneyhatterfestival.ie





16 December 2020

Submission to Bus Connects on Behalf of Stoneybatter Pride of Place(PoP)

Stoneybatter Pride of Place (POP) is a voluntary organisation comprising residents, businesses and community groups in the Stoneybatter area. We have over 400 residents on our mailing list and 13,000+ 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 annual three-day Stoneybatter Summer Festival which pre-Covid attracted more than 10,000 people. We engage with the local primary and secondary schools and with the new Technological University in Grangegorman which will have 10,000 students on campus by 2021. We provide support for senior citizens' groups in the area such as An Síol and also Brother Kevin, at 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 (2019) to reduce overall emissions in the transport sector of 35% to 40% 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 wish to acknowledge the open and productive engagement we have had with the National Transport Authority (NTA) over the past year in an effort to find workable and sustainable responses to the issues we raised in our submission of April 2020.

We welcome some of the changes that have been made to the original Emerging Preferred Route (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.

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 will continue beyond the epidemic and the number of commuters will reduce. The NTA 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 year 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 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 rat-runs and the degradation of air quality.

- i. Oxmantown Road: Residents of Oxmantown Road are particularly concerned that this street will become the 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 1,100 new housing units proposed and at least an additional 400 car-parking spaces.
 - While BusConnects proposes to have turn bans into Oxmantown Road, these will only be effective if there is proper enforcement.



It would also be important to limit access to Oxmantown Road from Aughrim Street, while continuing to allow access to St Gabriel's School at Cowper Street and Carnew Street. No left turns on Oxmantown Road at the top of Cowper Street and Aughrim place should also be considered.

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.

ii. Aughrim Street: Residents of Aughrim Street remain 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 off Aughrim Street and the increased traffic on Aughrim Street will create road safety issues for pupils attending this school. 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.

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.

As outlined above general traffic should be dissuaded from travelling down Aughrim Street to access Oxmantown Road.

Also a pedestrian crossing on Aughrim Street at the junction of Cowper Street should be installed to facilitate church and school crossings.

iii. Prussia Street: The creation of a 24/7 Bus Corridor on Prussia Street is problematic on a number of fronts. As outlined above, general traffic is 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. 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 access for residents of Fingal Place, St Joseph's Place and St Joseph's Road.

- iv. 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.
- V. Kirwan Street: The proposal to allow traffic turn into Grangegorman Lower from Brunswick Street North 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.

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 route to avoid traffic back-ups on Brunswick Street.

The Filtered Permeability Scheme currently in operation on Grangegorman will require traffic that enters Grangegorman Lower to turn into Kirwan Street as it will not be possible to continue up Rathdown Road. The main entrance to Stanhope Street Primary School is on Kirwan Street and the school is already reporting pressure due to the Filtered Permeability scheme.

Residents in Kirwan Street are also concerned that there is no provision for them to turn left onto Manor Street. Kirwan Street is a one-way street and the right turn ban into Manor Street will create much longer journeys for Kirwan Street residents seeking to access the Quays. As it will be mostly residents of Kirwan Street looking to turn left at this point, the numbers will be low and should be facilitated.

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. 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. 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.

 We urge the NTA to consider relaxing the Bus Corridor on Prussia Street and the Bus Gates on Manor Street and at Blackhall Place during off-peak hours. This would relieve pressure on Oxmantown Road, Aughrim Street and Kirwan Street.
- 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 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, and to share their findings with local residents before planning permission is sought.

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 reiterate our request for a 30km per hour speed limit through the village, 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 No Vehicular Access to Stoneybatter from the North Circular Road

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 (outlined in Map 36) 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. Moreover, replacing the BusGate at Blackhall Place with a Bus Priority system (even during out of peak hours) would also facilitate 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. Such a move would be particularly valuable if the Filtered Permeability Scheme at Grangegorman is retained.

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

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.

The owners of Walsh's Pub have expressed their concern that their cellar access is located on North Brunswick Street and they are 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.

The proposal 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.

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. If the NTA is not willing to consider this 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

It also appears from the map that the **three loading bays** have been removed from (i) the Social Fabric Café and (ii) Moo Market and (iii) beyond the Drink Store. The area outside the Centra supermarket appears to be marked as a loading bay 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.

This means that businesses in the heart of the Village on Manor Street and Stoneybatter cannot safely accept deliveries or arrange deliveries to customers. BuConnects makes no provision for alternative delivery systems.

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 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. If the loading bay issue is not addressed properly we could lose the businesses that actually are at the centre of the village.

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.

Adequate provision of loading bays or alternatives must be included in the final submission to An Bord Pleanala.

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

As the NTA is aware, 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.

As we outlined in our previous submission, 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 this year. This has been a phenomenal success. Dublin City Council also provides their Christmas lights on a tree at the top of the village.



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 <u>not</u> 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.

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.

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 and 10,000 third level students are expected to start in TU Dublin, Grangegorman by the end of 2020.

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 one meeting between Stoneybatter PoP and the NTA, it was agreed that a **Dublin Bikes** Station would be installed outside Love Supreme and that commitment should be reflected in the revised proposal.

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

The cycle lane on Queen Street should be relocated to the Smithfield side of the road and consideration should be given to widening the footpaths on Queen Street with just one lane of traffic.



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 welcome the proposal to widen the footpaths on Manor Street and Stoneybatter. In particular the footpath at the junction of Stoneybatter/North King Street (at Lucky Barbers) should be widened. Also, the footpath at the junction of Prussia Street and Manor Street should also be widened.

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.

The current proposal show the removal of two pedestrian crossings. 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 amount of traffic that will traverse that crossing 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 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.
- Low Fares We support a standard fare of €1 or €2 to encourage people to use the bus. The NTA's proposal for one fare for all public transport for up to one hour is welcome. The single transferable time limited ticket planned as part of Bus Connects needs to be delivered as soon as possible, even in advance of the implementation of Bus Connects as it creates a normalisation of the convenience and cost effectiveness of public transport use.
- 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.
- A 30km per hour speed limit throughout Stoneybatter should be introduced.

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 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 acceptable 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 bus highway.

We request the NTA to continue their dialogue with the local community to work through the outstanding issues as outlined in this submission. We look forward to receiving the outcome of the Environmental Impact Assessment from you before a final application is made to An Bord Pleanala.

We remain available to meet with the NTA (remotely or at your offices when the COVID-19 restrictions are lifted) and work through the issues.

Yours sincerely

Joe Costello Chairperson Davina Smith

Louise Keegan

Secretary

Treasurer

Submissions and Observations of Sophie Robson, owner and proprietor of Lilith Off License 31a Prussia Street, Dublin 7 supporting Prussia Street Traders (Park Shopping Centre and satellite businesses) On Blanchardstown to City Centre Core Bus Corridor Scheme

Points to be considered regarding the proposed bus corridor plan - Blanchardstown Scheme.

My shop Lilith is a new business and having a total ban on cars on Prussia Street will have a very negative and serious impact on my business. I rely on people who drive as well as pedestrians and cyclists as customers. By cutting off Prussia street completely, it is the equivalent of handing out P45s to small business and sole traders. Alternatives should be examined before implementing a death sentence to businesses on Prussia Street.

I spoke with a person from the NTA on Wednesday 24th August who informed me that I could have deliveries to my shop from a parking space around the corner on St Josephs Road. I was very surprised that anyone would think that this would be a solution, taking into account Section 4(f) of the Dublin Parking Byelaws 1969 - Non application of parking prohibitions — a vehicle parked (other than in a meter parking place or a loading bay merely while good are being loaded in or on to or being unloaded from. My business relies on deliveries and they are bulky and heavy and the shortest possible distance from vehicle to shop is the only option. Joseph's Road entrance is 74 metres south of my shop on the far side of Prussia Street.

Are there compensation packages in place for the businesses about to be ruined by the scheme.

When there are losses suffered and livelihoods lost, what is the government prepared to do to make good those who will be so badly affected by this proposed action?

Hugh Creggan, of the NTA has had to back track on his plans to enforce bus corridors in areas of Dublin where the residents had the necessary funds to object to the plans. i.e. Rathgar Road and Mobhi Road.

The bus corridor plan was drawn up pre- Covid and with the advent of working from home, the numbers of commuters to use this bus corridor is, and will continue to be significantly different from original commuter figures. Have the NTA carried out detailed and updated analysis of the numbers of commuters to use the bus corridor?

The NTA plans are discriminatory. Not everyone can walk long distances or cycle. Some people especially those who are older and, also those with mobility issues depend on a car for all the necessary day to day errands.

Not all change is good. When it comes to traffic planning there have been plenty of ill- advised decisions. Church Street and all the way to Phibsborough is now a traffic blackspot since the introduction of cycle lanes. The cycle lanes could have been a huge benefit if the road and pavements had been re- engineered using some basic common sense.

I was on Capel Street at the weekend, there were very few cyclists or pedestrians to be seen, I was half expecting tumble weed to blow down the length of it, it was so deserted it will be interesting to see how many businesses survive there. Encouraging people back into the city and supporting residents and businesses instead of driving them out should be a priority for government. Derelict and abandoned areas only encourage criminal and anti-social behaviour. The residents of Prussia

Street and Stoneybatter were very pleased when I reopened the shop. It contributed to the area in a very positive way. Unfortunately, I have been assaulted and robbed in my shop by a drug addict, it was a very traumatic experience. I believe that having no through traffic would add to the crime problem and anti-social behaviour on Prussia Street.

Taking into account the current cost of living crisis and the rising cost of fuel, adding extra kilometres to anyone's journey is adding a further cost to people already having to deal with financial pressures.

The traffic jams and added distance will not help the air quality. Part of the proposed plan is to cut a lot of mature trees on the route. Green washing by saying these will be replanted is totally disingenuous.

There could be a compromise for Prussia Street, as seen with the College Green Bus Corridor. It could be operational on Monday to Friday from 7am to 10am and from 4pm to 7pm.

Though far from ideal, it could be a lifeline to businesses in the area and could be considered.

Sophie Robson

Lilith Off-Licence

<u>Submissions and Observations of David Higgins, Property Manager on behalf of Bridlegrand Ltd, commercial landlords of Park Shopping Centre, Prussia Street, Dublin 7 supporting Prussia Street Traders (Park Shopping Centre and satellite businesses)</u>

On Blanchardstown to City Centre Core Bus Corridor Scheme





The Park Shopping Centre Ltd 33 Prussia Street Off North Circular Road Dublin 7

National Transport Authority Dun Scèine, Harcourt Lane Dublin 2, D02 WT20

Telephone 868 0544 Fax 868 1103

25th August 2022

RE: Blanchardstown to City Centre Core Bus Corridor Scheme

Dear Sirs.

We are writing on behalf of the commercial landlords of Park Shopping Centre, Prussia Street, Dublin 7, who are Park Shopping Centre Ltd & Mankato Ltd C/O Bridlegrand Ltd.

We write this letter as our objection to the proposed Blanchardstown to City Centre Bus Corridor, passing Prussia Street.

The reasoning for the objection is that on review of the proposed new bus routes, Prussia Street will become inaccessible by private vehicles, and only for Buses and Bicycles.

This change and restrictions to the roadways would be detrimental to the Shopping Centre for the following reasons;

- · Detrimental to the current Commercial Tenants businesses within the centre
- Detrimental to future possible leasing and licensing of vacant units in attracting new commercial tenants to the centre
- Detrimental to the footfall and access to the centre by customers who are using private transport
- · Depreciation of the development capital value in future sale
- Potential current tenants seeking to break their lease agreements and vacate the units, loss of rental income

We are in full support of the tenants within the centre's intention to also submit an objection to the proposed new Blanchardstown to City Centre Core Bus Corridor.

Yours sincerely,

David Higgins MIPAV Property Manager Smart Property

License: 003506 - 007964

On behalf of Landlord, Bridlegrand Ltd

VAT Number 1R 4740598 G Registered Number 102902



They cannot now say they were unaware of the potential consequences, i.e business closures and job losses.

2. Removal of loading bays.

How can businesses survive without deliveries? The verbal solution we got to this was Night Time deliveries. Which of the small businesses located on Manor St can afford to stay open overnight to facilitate deliveries or for that matter can dictate to the Multinational Delivery Companies a night time delivery. Where is the work life balance in that? It is clear that the people suggesting this are not attempting to un a business or remain competitive against the Multinational.

Stoneybatter has 62 such Businesses

- 3. Insufficient details on how local access will be controlled or preserved. Again as stated above Customers need to be able to get to us as easily as possible. To date we have been successfully tendering for contracts for supply of School Uniforms to schools that are not located in our area. How can we continue to be successful in these Tenders if we are unable to give clear and concise directions to our shop.
- 4. Removal of residents parking throughout the route, driving traffic into side streets already over capacity. This will create tension between our customers and he local community as everyone will be vying for the same few parking spaces. There are no gardens on the side streets so our customers will be parking on local Residents Doorsteps. How would any member of the NTA like this outside their door? If it's not good enough for you it's not good enough for us.
- **5.** Increased traffic levels on residential streets, secondary roads due to traffic diversions and on the main radial route, turning Stoneybatter into a 4-lane carriage way
- **6.** No park-and-ride or other incentive to use bus transport instead of cars as part of the route
- 7. No congestion charge or other deterrents to the use of private cars along the route
- 8. Impact of road usage/traffic and deliveries to bus journey times





- 9. Access to local bus services (full buses on local routes)
- 10. Inadequacy of cycle facilities through the route, particularly in relation to safety
- 11. Insufficient details on traffic calming and speed restrictions
- 12. Irreparable damage to the historic village of Stoneybatter and the principles of sustainable community development
- 13. Bias towards buses throughout the plan, no consideration for pedestrians, scant regard for bicycles and disregard of existing traffic on the route
- 4. No evidence of trees in plans and cross sections, including the 18 trees that line Manor Street, or the three mature trees at the Aughrim/Prussia St junction
- 15. Destruction of our 'village green' at the Millenium stone
- 16. Road not wide enough in parts to accommodate stated cross sections and no consideration given to contra-flow (bus lanes that run into town in the morning peak hour and out of town in the evening)
- 17. Additional traffic pressure from Grangegorman, The O'Devaney redevelopment, and the three student accommodation centres being built in the area were not taken into account.
- 18. Social impact on Stoneybatter. I can't even begin to say what the effect of this paln would be other than to say it will result in the DEATH OF OUR VIBRANT COMMUNITY.

Kind Regards Le mórmheas agus gach dea ghuí	
Jim Grant	Karen Grant

GRANTS of Manor Street Dublin 7 087 2339243 01 6791626





Stoneybatter deserves more than to be dismissed as a casualty by Bus Connects!

My name is Jim Grant, our family have been living and running Businesses on Manor Street since 1920. I love this area but I am now very worried about its future. I have engaged with Bus Connects from the beginning but nothing I have asked for has even been considered in spite of our extensive history of 100 years. If our concerns are not worth considering, who are?

Dublin's Stoneybatter district has been given the title of Ireland's "coolest" neighbourhood and ranks in the top 50 in the world, according to Time Out magazine. We have worked hard for this recognition through our organisation "Pride Of Place". At the very first meeting whe all these changes were proposed I was told that nobody from the team had even walked our street and nobody has ever come into my shop to ask for my opinion on any of the proposed restrictions that will cut us off from our customers.

Bus Connects put forward a finished route on the first day and so far they have not altered it in any way. The landscaping has been changed, extra cycling facilities added (even though this is Bus Connects, Not Bicycle Connects), parking facilities have been further reduced and extra restrictions placed on motorists. All without considering the people who live and work along the routes.

When all this started we were told that it was to improve commute times. I asked how much it would improve the times and I was told 7 minutes. I asked how this figure was arrived at, what data used, but was told it was commercially sensitive, a non-answer. I asked what was the source of the data but was again dismissed. Then Bus Connects cynically gathered data on the week of the 5th of December 2019 to exaggerate their claim that the city is drowning in traffic congestion. I asked what criteria would make Bus Connects a success but was given a vague answer. When asked what would make it a failure I was told we would have to see it evolve over time. All these answers are unhelpful to say the least, however in the meantime the future 95 businesses in Stoneybatter are in the hands of Bus Connects.

It is really easy to criticise a project, but when genuine alternatives are continuously put forward and **ignored** most reasonable people tend to say "what is the point?".

Why do the restrictions have to be 24hrs? We asked could we not have an inward bound bus lane in the morning and an outward bound one in the evening and the off peak side could double for parking. This works very well outside The Law Society at Blackhall place. No answer given





I asked about using the **Phoenix Park as an alternate route** at the beginning of this project but there was no genuine engagement with the OPW. Why can't people access the Zoo or the centre of the Phoenix Park by public transport? **Tourist buses are already allowed to use The Park.**

Stoneybatter has a diverse mix of family types and ages so in many cases cars are essential. but by **removing 58 car parking spaces** it will have neighbours fighting over the few remaining car spaces.

Bus Connects says it wants to reduce emissions by people taking public transport but no figures are given for the extra emissions from cars stuck in traffic or having to take extensive circuitous routes. For example a Primary School student living on Anamoe Road, on wet winter morning their parents want to drive them to school. They will have to drive an extra 6Km to travel IKm and an extra 2Km home. Is this progress? If they tried to get the Bus it would be full with commuters from farther out.

Bus Connects doesn't take into account that a commuter from Dunboyne, Clonee or Blanchardstown has the choice of 3 train stations to use on their way into the City Centre, and Bus Connects has no integrated ticketing system or extra Park & Ride facilities in development.

How much has Bus Connects cost so far? I believe that they are pouring money into the entire project in order to say "we cannot now waste what has been done so far".

When Hugh Creevy was asked by Manor Pharmacies' Dominic Cooney How would customers get to businesses in Stoneybatter? "He was told "there is no doubt there will be a few casualties from this project"!!!! For me this summed up the lack of consideration Bus Connects has for the people and businesses of Stoneybatter, but Hugh and all the Bus Connects consultants will pocket their hefty fees by introducing this "City Destroying Project" and then move on to the next one without dealing with the consequences of their draconian measures.

Is there anyone who has read and considered my objection that will take the time to meet with us The Business people on Manor Street? As it stands Bus Connects ticks a box by meeting with us but there is no meaningful effort to reach a compromise to address our concerns. As stated earlier Bus Connects put forward a finished route on the first day and so far they have not altered it in any way.

have not altered it in any way.	
Sincerely Yours,	

Jim Grant

9.2

To whom it may concern:

I have been following the consultation process for BusConnect over the last three years and I have found the responses to the concerns of residents and business-owners very inadequate and at times, disrespectful and insulting.

At first glance, the detailed document currently available online outlines a seemingly very efficient transport system mapped out on a blank canvas. The major problem with this presentation is that Bus Connect is a layer above a very vibrant city – you do not have the luxury of a blank canvas. The blank canvas was the starting point for the Vikings over a thousand years ago! Since then, a city of many villages has grown up and your proposal sets out to carve up these villages and decimate various ways of living.

It appears that all the focus is on the commercial side of moving commuters as quickly as possible in and out of the city centre and we are told that the route from Blanchardstown will save approximately seven minutes. Is that a guaranteed saving or have you any way to measure the success or failure of this proposal before carving up the city?

I found the website had lots of sound bites and nice logos, but I did not see

- too much information about the customer base to fill all the buses, taxies or bicycles.
- all the incentives for private motorists to set aside their personal vehicles in favour of the BusConnect vehicles.
- the compensation details for all of us who will no longer be able to park or drive in our own neighbourhoods.

I did see lovely lines for the buses, taxies and bicycles to move along, uninterrupted in some places, by private motorists and when the consultants were asked where the private motorists were to drive, the answer was water finds its own course. Sadly, our cars are not water and they are unable to move through the same small crevices as water can and the question still remains unanswered.

My interest is in the Stoneybatter section of the route from Blanchardstown but I understand the concerns I have are replicated across the city. The map in the documents online does have a number of roads which on the surface appear suitable alternative options but on closer inspection, many routes have been altered in recent years. Under the banner of COVID Mobility, there is the 'trial' cycle route through Grangegorman resulting in through traffic to Manor Street-Stoneybatter being blocked off. Further along the North Circular Road, motorists trying to access Manor Street-Stoneybatter along Oxmantown Road have to motor through the traffic calming chicane. Arteries to the heart of the area cauterised in favour of a drive-through!

In my submission regarding the cycle-lane through Grangegorman I mentioned the following issues

- Car spaces removed in favour of cycle racks
- Cycle lanes introduced/enforced
- Vehicular traffic restricted
- Traffic calming measures which slow up traffic adding to motorist frustration
- Closure of Grangegorman to vehicular traffic
 - (a) encouraging would-be customers to go elsewhere
 - (b) adding mileage to journeys
 - (c) gridlock along the North Circular Road

I note a significant increase in the number of services being allocated to cyclists with little or nothing in favour of any other individuals in the area.

I appreciate that use of cycles is being encouraged to help save our environment **however** should motorists and pedestrians be treated so badly?

'Safe cycling' is mentioned on the online descriptions, but I respectfully suggest that safe cycling starts with the cyclist. Day on day pedestrians are being bullied off the pavement along Manor Street and Stoneybatter despite the protected cycle lane which has been a wonderful asset for the cyclists. There is no significant policing of the cyclists who daily and repeatedly ignore the traffic regulations such as traffic lights, pedestrian crossings, correct/appropriate clothing to ensure safety for themselves and other road users and indeed pavement users.

At every juncture, motorists are taxed – VRT, fuel, insurance, parking etc. while there is little or no taxation of cyclists or cycling, even though both categories use the roads and road services.

Motor insurance is through the roof these days – why are cyclists not obliged to pay insurance? It's not a level playing field!

I watched the YouTube presentations explaining how the traffic flow would work at junctions and was impressed. The presentations assumed compliance with the rules of the road and since watching them, I started making a mental note of traffic movements in the Stoneybatter area and found the following:

- On average three road users (bus, taxi, private motorist and mostly bicycles) go through the RED traffic lights when pedestrians are trying to cross legally.
- When the lights are against the traffic, cyclists often use the pavement.
- Surprisingly, it is safer on occasion safer to walk on the road rather than be ploughed into by a scooter user or cyclist!

Obviously, they are aspirational, but I suggest, unrealistic. Given the obvious benefits of this proposal to some individuals, I would like to see some data relating to the collateral damage on the existing city business-people and residents. I think you might refer to them as the *broken eggs necessary to make an omelette*. Were we even factored into the equations when you were doing the figures?

Other unanswered questions:

- Why is so much road being given over in its entirety to commercial vehicles such as buses, taxis and coaches, while other commercial vehicles will be forced to run up extra travel time and road miles going through circuitous routes to avoid BusConnect?
- How does one get to any of the hospitals for appointments or for emergency visits (which would not be suitable for ambulances!)
- Why does the proposal not have consideration for all motorists using the BusConnect routes outside rush hour?

My final observation during this extremely stressful time is that a dog owner must license their pet and in most cases, have the animal insured. A cyclist is not required to learn the rules of the road, is not punished for failing to comply with rules and pays nothing for the maintenance of the services they use. In my opinion, their meagre contribution to a greener environment does not warrant such a high level of expenditure, not to mention the annihilation of so many villages.

Kind regards

Paddy Pender

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