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Commissioners of Public Works,,  
51 St. Stephen's Green,  
Dublin 2.  
Co. Dublin

27 May 2009

Submission on the Draft Conservation Management Plan for Phoenix Park

Dear Commissioners of Public Works

We would like to make the following submission on Conservation Management Plan for Phoenix Park – Consultation Draft.

### **1.0 Introduction**

The Dublin 15 Community Council was formed 15 years ago (merging the Castleknock & Blanchardstown community councils which date from the early 1970's) to provide an umbrella organisation for the many residents and voluntary community groups in the Dublin 15 area.

Residents Associations and Community groups focus on their own specific areas but often feel powerless to influence the big issues like transport, educational, recreational & sporting infrastructure or crime prevention. The Community Council provides a forum to discuss these issues and potential solutions.

Our main objective is to develop the consensus views of the Dublin 15 community in matters relating to Planning & Development, Public Transport, Environment, Education, Health Care, Policing, Job Creation, Recreational Facilities, General Infrastructure and Tourist facilities. Having developed the consensus, make representation to State and other Statutory Bodies through a wide variety of communication channels, with the aim of improving the quality of life for the residents of Dublin 15.

## 2.0 Major problems

Blanchardstown was earmarked from the early seventies as one of County Dublin's' three new towns. It has been anticipated for the past twenty years that this area would eventually accommodate a population of circa 100,000 persons. The 2006 census showed the population of the Dublin 15 area at 93,000. It is likely that over time the population will greatly exceed this figure given the extensive amount of land zoned for additional residential use within Dublin 15

With the explosion in economic development and the growth of residential developments in Dublin 15 have come many of the associated problems that accompany such success.

Those relevant to this study are;-

- Higher demand for housing.
- Increased inward investment in industrial / commercial activity, much of which is multinational in nature.
- Tremendous demand for Public Transport.
- Greatly increased levels of car ownership.

The effect of this is the carrying capacity of existing roads infrastructure being exceeded by demand and this is evident during peak time commuting in the Phoenix Park.

## 3.0 Impact of Draft Conservation Management Plan for Phoenix Park

This plan proposes several draconian measures that will greatly exacerbate the current difficult transport problems experienced by residents of Dublin 15. The following specific objectives and Short-to-Medium Term Actions are likely to cause major difficulties

Specific objectives:

- SO 9.1 To reduce the environmental impact of traffic traveling through The Phoenix Park.

Short-to-Medium Term Actions

The following are identified as actions to be undertaken in the short-to-medium term (5 to 10 years). Some measures will continue to be implemented as long-term actions.

- Action 9.2 Consider restricting unnecessary traffic from the Park, but in so doing to take account of the function of certain vehicular routes through The Phoenix Park, as well as addressing the impact of closure on any particular route on the surrounding area. **Unnecessary and or through traffic restriction at weekends** will also be considered.
- Action 9.5 **Limit through traffic at weekends** to facilitate increased recreational use of the Park.
- Action 9.10 Introduce **more stringent implementation** of the regulations in relation to commercial vehicles in the Park.

An unfortunate outcome of the haphazard development policies in Dublin in the past has been the failure to provide an adequate road infrastructure. This is very evident in west Dublin. Only three arterial routes exist to move people towards the city centre where the majority of commuters from our area go to daily.

These are;

- ❑ N3, Blanchardstown, Navan Rd, Cabra/ Phibsboro, City Centre.
- ❑ Hartstown/Clonsilla, Blanchardstown, Castleknock, Phoenix Park, Parkgate St , North Quays, City Centre.
- ❑ Hartstown / Clonsilla, Carpenterstown, Castleknock, Chapelizod, Conyngham Rd, North Quays, City Centre.

Traffic leaving the area for the South West of Dublin will either use

- ❑ The M50, joining at N3 junction or
- ❑ Use Chapelizod via Ballyfermot or
- ❑ Continue down to the Chapelizod Road and go via Kilmainham.

This difficult situation is exacerbated by proposals by both the OPW to restrict traffic through the Phoenix Park and proposals by Dublin City Council to restrict or prevent through traffic on the route Castleknock – Chapelizod - Conyngham Rd by closing access through Chapelizod.

#### **4.0 Possible solutions**

Modern urban and transport planning would suggest that in order to achieve a sustainable environment, we must have the participation and co-operation of the society, which planning and transport, environmental policies etc are designed to serve.

As a modern society we must recognise that people want a quality of life, which includes the flexibility to pursue their leisure activities, after their long day at work, study or in the home. The Phoenix Park is a wonderful amenity on our doorstep; we need to maintain accessibility to it for leisure activities, yet make reasonable provision for commuters who can not avoid passing through it.

These choices must focus on the positives and be so designed as to offer real incentives to persons opting to choose public transport. Currently we now discourage car journeys to the city centre by rapidly increasing car parking charges, and strictly enforcing penalties for parking offences. Yet in Dublin 15, the demand for our rail and bus services far exceeds capacity [and thus forces people into their cars].

A persistent concern of residents in Dublin 15 is the length of time it takes to travel by bus to and from Dublin city centre. The growth of Dublin city in general and Dublin 15 in particular has resulted in peak time journeys from the #39 terminus to the city centre of 2

hours. Our submissions on the Traffic Study of the Phoenix Park as part of the public consultation process outlines the recent growth of Dublin 15, factors that have contributed to the current problem and our analysis of what improvements are necessary.

Obvious opportunities for improvement of the service.

- Eliminate the bottlenecks and piecemeal QBC corridor by connecting the # 39 QBC at Ashtown with the QBC along Dublin's quays.
- Permit the # 37 bus through the Phoenix Park either via the Castleknock or Ashtown Gate.
- Review the QBC routes through Dublin 15 to make better use of the modern road infrastructure constructed within the last 3-4 years, to provide the same coverage but with shorter journey times.

#### 4.1 Public transport solution

The environmental impact of a bus full of peak time commuters is less than the impact of each commuter driving their private car through the park. **We request that you adopt the following Specific objectives and Short-to-Medium Term Actions:**

- SO 9.1 To reduce the environmental impact of traffic traveling through The Phoenix Park *by encouraging a significant number of Dublin buses on route # 37 & # 39 to travel through the Phoenix Park from Castleknock / Ashtown Gate to Parkgate Street.*

#### Short-to-Medium Term Actions

The following are identified as actions to be undertaken in the short-to-medium term (5 to 10 years). Some measures will continue to be implemented as long-term actions.

- Action 9.2 Consider reducing unnecessary traffic from the Park, *by encouraging peak time commuters to switch to public transport and working with Dublin Bus to provide route(s) through the Phoenix Park. Investigate introducing a bus gate on roads that are currently closed which improves journey times and provides a positive encouragement for a modal shift to public transport.*
- Action 9.5 ~~Limit through traffic at weekends to~~ facilitate increased recreational use of the Park *at weekends by promoting it as a destination to the wider Dublin metropolitan population and/or specific events.*



4.2 Sustainable transport solution

The Phoenix Park has the potential to provide an attractive cycle route for commuters from Dublin 15 to the city centre. **We request that you adopt the following Specific objectives and Short-to-Medium Term Actions:**

- Action 9.7 Complete a full circuit of cycle trails and footpaths to allow families and young people in particular to cycle and walk safely throughout the Park. A particular feature of this should be linkages to external cycle routes and leisure trails. *Agree with Fingal County Council and Dublin City Council safe routes for cyclists that separate them from general road users and eliminate risks to cyclists from other road users*
- Action 9.8 Continue improvement works in relation to car parking, and general road conditions, in particular the upgrading of Chesterfield Avenue. This will also encompass regular and appropriate maintenance of all pathway, cycle track, and roadway surfaces.
- Action 9.9 Actively discourage off-road parking on footpaths, verges, open areas and plantations and encourage the use of particular routes for recreational activity, walking and cycling. *Track number of cyclists using Phoenix Park to commute to work, evaluate capacity of cycle routes and encourage an increase in cyclist journeys by ensuring cycleway capacity stays ahead of demand.*

We believe that the amendments proposed above are reasonable and request that our the proposed changes (*bold italics text*) are incorporated in the final Conservation Management Plan

Yours faithfully

Public Relations Officer  
Dublin 15 Community Council

Copies to  
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Local public representatives.