Submission No.	**123 - also addresses submission no. 124 (identical submissions with additional queries in 123)**
Organisation Name or Name of Submitter	**Iona and District Residents Association, 16 Iona Park, Glasnevin**

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Letter Re: Submission by Iona and District Residents Association (IDRA) to An Bord Pleanála on the MetroLink				
1	Observations	1	Recent minor works on Harts Corner (the intersection of Prospect Road, Botanic Road and the Finglas Road) lead to a meaningful increase in late evening traffic through our residential area. This, and previous experience of traffic around a major project, has lead residents to the conclusion that a major, multi-year infrastructure project will have a substantial detrimental impact on this residential area. We therefore seek a traffic management plan for Iona District to be implemented before, or close to the inception of Metrolink works.	TII have through pre-construction planning in advance of the Railway Order anticipated the implications of the planned works on the locality, particularly traffic and accordingly have provided mitigation strategies in the EIAR for the construction phase. While the works will attract additional traffic to and from Glasnevin Station, the assessments of vehicle movements during the peak construction phase indicate an average of approximately 50 additional daily movements each way to the existing traffic flows. Chapter 5 of the EIAR (MetroLink Construction Phase) explains that traffic management plans for the construction phase of the Project have been developed to minimise the impact on road users, and to maintain access to businesses and other premises. Prior to implementation, all traffic management measures will be agreed with the relevant local authority (DCC for Glasnevin) and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken. Refer to EIAR Chapter 5 Section 5.4.12. The design of traffic management measures and highways works is based on achieving the key objective of maintaining continual access to all properties during the works. Where necessary, a safe alternative route will be provided for pedestrians and vulnerable road users, such as children, and persons with restricted mobility, to maintain pedestrian access to premises. Where detour routes are required, these will be kept as short as possible and detour signage will be clear and easy to understand. All construction sites will be designed to be as unobtrusive as possible. Please refer to section 5.5 of the EIAR Appendix 5.1. As outlined in Appendix A5.1 Outline Construction Environmental Management Plan - CEMP, the appointed contactor(s) are required to implement the measures in relation to traffic and transportation during construction. Following the appointment, the contractor(s) will be required to develop an updated contract-specific CEMP which will detail all measures to be employed in relation to all potential impacts on traffic and transportation. Other measures include the control of construction vehicles in terms of their hours of operation and restrictions on vehicle size and weight. It has been assumed that regular HGV deliveries to Glasnevin will be restricted outside of standard hours. This is referred to in section Appendix 5.5, 8.6 Traffic Management. Out of hours deliveries at Glasnevin are anticipated, but these typically would be either: abnormal load deliveries requiring an Abnormal Load Permit issued by An Garda Síochána and the local authority; or deliveries during any occasional weekend track possession works planned at Glasnevin. During the Main Works for Glasnevin Station, no road closures or lane reductions are required. During the Enabling Works for Glasnevin Station, the removal of 90m of bus lane on Prospect Road northbound is provided, with priority given to pedestrians. As presented in Appendix A9.5 Scheme Traffic Management Plan, as the construction site boundary is primarily contained away from the traffic network, there is likely to be no significant impact on traffic flows throughout the construction period while temporary traffic management is implemented. Analysis shows that construction traffic movements will likely result in a minor impact on the nearby signalised junctions on Prospect Road, however traffic flow will be generally unaffected. There will be some impact on Prospect Road (R108) where site vehicles routing from the north to the site will be required to take a right into the site, leading to an increase in HGVs in the area. The proposed site entrances will be from Prospect Road and will be adjusted several times during the phasing of the works. In general, where the site access points are relocated, the change in location is minimal and will result in little change in impact to the local or wider transport network.

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2	Background	2	We suggest that long-term initiatives are needed to reimagine the neighbourhood and ensure a more sustainable and safer neighbourhood inclusive to all demographics within our community. We propose that the neighbourhood is designed for local requirements first - with a view to making the district a safe place to access and move around. The area needs to migrate away from a car centric location.	Chapter 3 (Background to the MetroLink Project) details the need for the Project. As noted, MetroLink will contribute significantly to the transformation of the lives of the 1.6 million people projected to live in the Dublin region by 2040 (CSO, 2020). The growing population and higher-density housing will create demand for a reliable, high-capacity, sustainable public transport system that helps Ireland meet its climate change commitments of reducing its greenhouse gas (GHG) emissions by 51% by 2030 and reaching net zero no later than the year 2050. MetroLink will address challenges of compact growth, sustainable mobility, enhanced regional connectivity, quality international connectivity, transition to a low carbon and climate-resilient society, enhanced amenity and heritage, maximising sustainability gains, strong economy supported by enterprise innovation and skills, access to quality childcare, education and health services, and strengthened rural economies and communities. It is anticipated that, overall, the proposed Project will provide for improvements to the public transport network, resulting in decreases in car usage/trips, increases in public transport usages, and will facilitate walking and cycling to the stations, without significantly impacting on the operation of the networks in the area.
3	Metrolink	2 and 3	Metrolink (Glasnevin and Griffith Park stations) and the associated works are very substantial projects with potentially very positive impacts on the district and wider city. The location of the district means that there will be major construction works in our immediate vicinity. There are not yet specific construction timetables, but these works could be expected to continue for close to a decade.	TII notes and appreciates the support for the delivery of MetroLink, and the selected station locations. As detailed in Chapter 5 (MetroLink Construction Phase), the programme for the construction of the proposed Project has been optimised to minimise the duration of the Construction Phase, where possible, in order to lessen the duration of potential environmental impacts, while ensuring that the areas surrounding the works sites remain operational and functional. A summary programme showing the duration and phasing for the construction of the proposed stations and surface works along the alignment is shown in Diagram 5.3 of Chapter 5 (MetroLink Construction Phase), with a detailed construction programme presented in Appendix A5.2. At Glasnevin, the programme sequence developed incorporates the works proposed by Iarnród Éireann for lowering of the MGWR and GSWR tracks, in order to ensure interfacing and timing of works is optimised to suit both parties.

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4	Impact during works period	4	During recent road works around Harts Corner (road resurfacing for a few consecutive evenings) it was clear that there was a pickup in traffic through the district in the late evening and early night as drivers diverted around a relatively modest section of works. We have concern regarding an increase in cut-through traffic seeking an escape from major civil works during the multi-year build and implementation phase.	Please refer to response above (1) related to the traffic management during the Construction Phase. As indicated, analysis shows that construction traffic movements will likely result in a minor impact on the nearby signalised junctions on Prospect Road, however traffic flow will be generally unaffected.
5	Long-term impact, NTA modelling and forecast traffic growth in and around Iona District	6	An increase in traffic in a residential area is unwelcome, also it is difficult to see how Whitworth Road and St Annes Road would experience increased traffic without some spill over of cut-through traffic into the remainder of Iona District. New traffic flow patterns will create new cut-through routes, a long-term traffic management solution can protect this residential district against future traffic problems.	Please refer to response above (1) related to the traffic management during the Construction Phase. As indicated, analysis shows that construction traffic movements will likely result in a minor impact on the nearby signalised junctions on Prospect Road, however traffic flow will be generally unaffected. Figure 6.21 (presented in the submission, excerpt from A9.4 Traffic and Transport Modelling Report) presents a strategic overview of the changes in traffic flow in the operational phase in Scenario A 2035 AM Peak Hour. The thickness of the lines in this image are proportionate to the increase in flows. Therefore, any increases on local roads in this area are minimal, as illustrated by the thin lines. As noted in response item (2) above, it is anticipated that, overall, the proposed Project will provide for improvements to the public transport network, resulting in decreases in car usage/trips, increases in public transport usages, and will facilitate walking and cycling to the stations, without significantly impacting on the operation of the networks in the area.

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6	Residents' concerns	6	We are requesting a review of traffic management in the district as part of the wider design of the Metrolink projects to: - ensure safety for pedestrians and cyclists, - apply good quality modern placemaking to help improve accessibility within the locality, - apply international best practice to help highlight and address the negative traffic impacts on our community, and in the longer-term - bring about the behavioural changes required to address environmental challenges.	Please refer to responses above (1 and 5) related to the traffic management during the Construction and Operational Phases of the MetroLink project. Traffic management plans for the construction of MetroLink have been developed to minimise the impact of the scheme on road users, and to maintain access to businesses and other premises. A hierarchical approach to traffic management has been adopted with pedestrian/cyclists, public transport and commercial needs provision taking preference over private car usage. Pedestrian routes will be maintained throughout the construction period, either around or through the construction site, where safety risks to the general public will not increase as a result of construction activity. Chapter 4 (Description of MetroLink Project) details the over-arching architectural, urban realm and landscaping design principles for the Project. As detailed, Glasnevin Station will include enhanced pedestrian and cyclist facilities along Prospect Road. A two-way cycle lane along the east side of the road and widened footpaths on the west side will be provided as well as an additional pedestrian crossing to the north of the station. Enhanced bus stop facilities are proposed outside the station. A new access road from Prospect Road to the drop-off facilities will also provide access to 120 cycle parking spaces. The Glasnevin Station will also offer direct interchange with the heavy rail network through the integrated Iarnród Éireann station at this location. The proposed Project has been designed to ensure maximum interchange with other modes of transport, specifically more sustainable modes of transport such as walking, cycling and public transport. Please refer to response item (2) in relation to the Project's contribution to meeting Ireland's climate change targets.
7	Safety issues	6	Despite the size of the area, there is minimal public communal recreational space within our boundaries. This means that children, local schools, families, dog walkers, and runners must use roads for, and as access routes to, social and recreational facilities. Over the years there has been a noticeable increase in the number of district residents who cycle on a daily basis. Many commuting cyclists choose to pass through the district as they travel to and from the city, or on cross city journeys. A number of older residents use mobility scooters, walking aids and wheelchairs to support independent living and their access to local facilities.	Please refer to response item (6) above in relation to the hierarchical approach to traffic management during the construction phase to prioritise the safety of vulnerable users. Please refer to response item (6) in relation to the proposed cycle facilities to be provided at Glasnevin Station. Chapter 6 (MetroLink Operations and Maintenance) details how the proposed Project has been designed on the principle of Access for All. The design has been developed to meet all legislative requirements relevant to accessibility including the Disability Act 2005 and in turn the Sectoral Plan for Accessible Transport under the Disability Act 2005 (DTTAS 2012). The approaches to the station entrances are positioned to provide convenient access with minimal changes in level. Design features to facilitate safe access to the station entrance include signalised crossings, 'raised tables' within the roadway to reduce traffic speed at pedestrian crossings and dropped kerbs on pavements on both sides of the crossing to remove a trip hazard and aid wheelchair users and people with wheeled luggage. Tactile paving surfaces will warn pedestrians with visual difficulties of the absence of a kerb and guide them in the direction of the crossing.
8	Cut through routes	8	The MetroLink project will substantially change vehicle flows in and around the district. There will be multiple phases as drivers seek, and then establish new routes, during the construction phase, and then repeat the process when construction ends.	Please refer to response item (1) in relation to the impacts on traffic during the construction phase. Should any issues arise, a Project Construction Traffic Forum will be established allowing local stakeholders, such as residents associations, to voice any concerns and liaise with TII and the contractor(s) on the associated traffic management in the area. Refer to the Outline Construction Environmental Management Plan - EIAR Appendix 5.1. As noted therein, the Dublin City Council urban traffic signal control system will be used to optimise the flow of traffic along diversion routes to mitigate queuing and delay which would otherwise be expected during peak periods, therefore reducing the demand for cut-through traffic.

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9	Pollution Impacts	8	Large volumes of vehicles produce; noise, particulates, and emissions. These outputs have been estimated to travel distances of 50m up to some kilometres. A travel distance of as little as 100m would mean that almost all residences within the district are impacted by vehicle outputs on busier neighbouring streets.	As indicated in response item (1), there is likely to be no significant impact on traffic flows throughout the construction period while temporary traffic management is implemented. As detailed in Chapter 13 (Airborne Noise and Vibration), mitigations measures to reduce noise from construction traffic are limited to restricting speed limits, maintaining road surfaces and ensuring all vehicles are properly maintained. In addition, any coverings on construction vehicles will be securely fastened before leaving site to avoid excessive rattling. These coverings will also mitigate against dust and accidental spoil spillage. Chapter 16 (Air Quality) assesses the impact of construction traffic on air quality and emissions. The modelling of road traffic for impacts on human health and ecological receptors has found no significant impacts that require mitigation measures with respect to the modelling of emissions. However, some mitigation measures can be put in place to minimise emissions: * Implement a policy which prevents idling of vehicles both on and off-site, including HGV holding sites; * Construction Phase traffic should be monitored to ensure construction vehicles are using the designated haul routes; * Additional vehicular traffic will be managed through the CEMP and Temporary Traffic Management Plans for the proposed Project and stations as per Chapter 9 (Traffic and Transport); * Efficient scheduling of deliveries to minimise number of deliveries required, and in turn their emissions; and, * Construction vehicles should conform to the current EU emissions standards and where reasonably practicable, their emissions should meet upcoming standards prior to the legal requirement date for the new standard. This will ensure emissions on haul routes are minimised. Mitigation measures are required for the control of dust with respect of HGV movements on site and deliveries to/from the site: * HGV traffic leaving site will pass through a wheel wash; * Public roads outside the site will be regularly inspected for cleanliness and cleaned as necessary. If public roads are deemed to require additional cleaning where possible a suction device for road cleaning will be utilised which can access spaces around cars and other street furniture more effectively; and * During movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions.
10	Impact of cut through traffic on bicycle lanes	8	Bicycle routes run along the arterial roads that outline the district. Cut through traffic turning off the arterial roads crosses bicycle lanes at a high volume creating accidental risk and impeding cyclists.	As indicated in response item (1), there is likely to be no significant impact on traffic flows throughout the construction period while temporary traffic management is implemented, therefore the volume of cut-through traffic is not expected to increase. Please refer to response item (8) in relation to impacts of the traffic management at this location. As detailed in response item (6), a hierarchical approach to traffic management has been adopted with pedestrian/cyclists, public transport and commercial needs provision taking preference over private car usage. Appendix A9.5 Scheme Traffic Management Plan presents the assessment of impacts to all road users, including cyclists, during the construction works. During the Advanced Enabling Works at Glasnevin, the removal of the bus lane on Prospect Road will impact cyclists who will then be required to utilise the general traffic lane. This will reduce the cycling level of service at this location. During the Main Works, cyclists using the designated primary cycle route will not be affected by the proposed works.

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11	30km/h speed limit	9	The district is included in Dublin City Council's 30km/h speed limit zone. There is signage at entrances to the district, but motorists tend to either not notice it or ignore it. There is very little evidence of awareness that this speed limit applies to all roads within the district.	Please refer to response item (8) in relation to the proposed mitigation measures relating to traffic management.
12	Large vehicles	10	The district is subject to a 3.5t maximum gross weight restriction. Vehicles larger than 3.5t are regularly seen passing through the district. This happens at all times, including when children are going to and from primary school.	As detailed in Appendix A5.1 Outline CEMP, construction vehicles will be strictly controlled in terms of the hours of operation, and by imposing restriction on vehicle size and weight to minimise safety risk to other road users. As noted in response item (8), a Project Construction Traffic Forum will be established with representatives from key stakeholders to liaise on issues arising from the construction traffic movements and traffic management plans. Suitable spoil removal routes have been identified in order to direct construction traffic onto suitable roads, and to minimise the negative effects of increased HGV traffic on the environment.
13	Car parking	11	There are sections on St Alphonsus Road and St Patrick's Avenue where parking on footpaths (partially and completely) on both sides of the road causes wheelchair users, people with walking aids and parents wheeling children in buggies, to have no alternative but to move out onto the road in order to get past parked vehicles.	Traffic management plans are proposed within the vicinity of the construction sites, and therefore will not impact on areas such as St Alphonsus Road and St Patrick's Avenue. As noted in response item (2) it is anticipated that, once operational, the proposed Project will provide for improvements to the public transport network, resulting in decreases in car usage/trips. Appendix A9.2-G Traffic and Transport Assessment Glasnevin Station indicates that in Scenario A 2065 AM Peak Hour, that the zones around Glasnevin Station, including the Iona area, will see reductions in car mode share of up to 5 percentage points, indicating a reduced demand in car trips to and from this area. Therefore, there will be a reduced volume of cars demanding parking in the area and blocking pedestrian footways.

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14	Narrow footpaths	11	Footpaths in the district are generally wide enough. There are some narrow paths in the district, the most problematic are sections of Crawford Avenue near a primary school. Large, mature trees on; Lindsay Road, Iona Road, Hollybank Road, Gartan Avenue, and Iona Park cause narrowing of paths. Narrow footpaths in the district encourage pedestrians onto busy roads. Some path users needing a wider path (those with prams, buggies, on wheelchairs, mobility devices) may be forced onto roads.	As detailed in Appendix A5.1 Outline CEMP, pedestrian routes will be maintained throughout the construction period, either around or through the construction site, where safety risks to the general public will not increase as a result of construction activity. In very sensitive areas, such as in the City Centre or in the vicinity of schools, the designated access and pedestrian routes around the construction sites, particularly at and/or along the hoarding lines, must not be perceived as uninviting by pedestrians. The environment around the sites, therefore, will be designed to ensure that pedestrians and cyclists feel they are entering a safe and accessible environment. Temporary pathways will be installed where appropriate and provision will be made to ensure access for the mobility impaired is maintained. Where the existing level of service cannot be maintained in the vicinity of the construction sites, an alternative route will be designated, be clearly visible, be safe and be signed and have the level of service required to cater for the pedestrian demand. In recognition of the potentially complex routing and road crossing behaviour at Glasnevin Station in the operational phase, a microsimulation VisWalk model was produced for the area surrounding the station. The modelled layout includes the main roads and streets of Whitworth Road, Cross Gun's Bridge and Phibsborough Road. Analysis of the model indicates that the network operates with an acceptable level of service given the expected pedestrian demand in both the AM and PM peak periods. Further results of this analysis are presented in Appendix A9.2-G Traffic and Transport Assessment-Glasnevin Station.
15	What we are looking for	12	The number of issues we have highlighted are cause of concern in relation [to] the safety of residents, especially children and vulnerable adults and the enjoyment of living spaces by all residents. We are seeking a review, and traffic management plan, for Iona District for the duration of the Metrolink construction period(s) and the longer-term, particularly with a view to traffic calming initiatives. The lengthy construction period and subsequent change in traffic patterns will likely establish different traffic flows in the district, a traffic management plan should set out long-term goals for the post-construction period consistent with Department of Transport guidelines.	Please refer to response item (1) in relation to the impacts on traffic during the construction phase. As indicated in response item (1), there is likely to be no significant impact on traffic flows throughout the construction period while temporary traffic management is implemented, therefore the volume of cut-through traffic is not expected to increase. Should any issues arise, a Project Construction Traffic Forum will be established allowing local stakeholders, such as residents associations, to voice any concerns and liaise with TII and the contractor(s) on the associated traffic management in the area. As noted in Appendix A5.1 Outline CEMP, the Dublin City Council urban traffic signal control system will be used to optimise the flow of traffic along diversion routes to mitigate queuing and delay which would otherwise be expected during peak periods, therefore reducing the demand for cut-through traffic. Please refer to response item (6) in relation to the traffic management and promotion of sustainable modes during the operational phase.

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16	What we are looking for	12	Some more immediate measures could be introduced, e.g.: - Specific measures to discourage heavy vehicles from entering the district, - Specific measures at times when children are going to and from schools and childcare, - Sweeping corners on roads could be made safer so that vehicles cannot 'carry momentum' through corners, - Narrow sections of footpath on multiple roads could be widened so that pedestrians are not encouraged to walk on the road, - Roads could be narrowed to encourage motorists to moderate their speed, and - Adjustment of the mini roundabouts on Iona Road, St Alphonsus Road, and St Patrick's Road. These changes can have impact, but we believe that the range and extent of the problems and high volume of traffic require a more fundamental re-working of street design in the district.	1) During the Advanced Enabling Works at Glasnevin Station, modelling results indicate that the bus lane/general traffic lane removal will result in a slight impact on the section of road where the capacity is decreases, with an increase of volume of 3% in the morning peak and 2% increase during the evening peak. This increase results in a driver delay of approximately 40 seconds in the immediate area of the works. During the Main Works, analysis shows that construction traffic movements will likely result in a minor impact on the nearby signalised junctions on Prospect Road, however traffic flow will be generally unaffected. There will be some impact on Prospect Road (R108) where site vehicles routing from the north to the site will be required to take a right into the site, leading to an increase in HGVs in the area. Model outputs indicate that there will be minimal change in HGV volume as in both the morning and evening peaks, the roads immediately surrounding the station show that there is little change in the HGV flows. 2) As detailed in Appendix A5.1 Outline CEMP, where practicable, construction work requiring short-term disruption and road closures will be carried out when traffic volumes are lower, such as at night, at weekends and during to school holidays, to minimise disruption and safety risk. There are no proposed traffic management measures on the R135 Finglas Road in the vicinity of St Vincent's Secondary School and its associated facilities. Therefore, school children and staff will face minimal disruption, with the exception of additional HGVs on this route travelling to and from the designated spoil site. On Prospect Road, construction traffic accessing the site will require access across the footway, however notices will be displayed on all site boundaries, where appropriate, to warn of hazards such as construction access. Appropriate site lines/visibility splays will be maintained to ensure safety of both vehicles and pedestrians. 3) As detailed in Appendix A5.1 Outline CEMP, construction vehicles will be strictly controlled in terms of the hours of operation, and by imposing restriction on vehicle size and weight to minimise safety risk to other road users. As part of the mitigation measures during the construction phase, strict speed limits will be imposed on roads adjacent to construction sites in order to ensure the safety of all road users. 50kph speed limit in the city centre will be reduced to 30kph, and 80kph on all other routes will be reduced to 50kph. 4) Please refer to response item (14) in relation to pedestrian routing. 5) As noted in item (16-3) above, strict speed limits will be imposed on roads adjacent to construction sites in order to ensure the safety of all road users. 50kph speed limit in the city centre will be reduced to 30kph, and 80kph on all other routes will be reduced to 50kph. As noted in response item (2) it is anticipated that, once operational, the proposed Project will provide for improvements to the public transport network, resulting in decreases in car usage/trips. Appendix A9.2-G Traffic and Transport Assessment Glasnevin Station indicates that in Scenario A 2065 AM Peak Hour, that the zones around Glasnevin Station, including the Iona area, will see reductions in car mode share of up to 5 percentage points, indicating a reduced demand in car trips to and from this area. 6) Once operational, ultimately the aim of schemes such as BusConnects and MetroLink when completed is to enhance the reliability and use of public transport, thus reducing traffic through the Glasnevin area and Iona District. As part of the BusConnects Core Bus Corridor proposals, the future street level layout at Glasnevin Station reduces the current road network to one lane in each direction to accommodate a designated bus lane and bus stop along R108 Prospect Road. As part of the proposed Project, a taxi/drop-off area will be provided to the north of the station entrance in lands currently occupied by the Brian Boru car park. A new access road from Prospect Road to these facilities will also provide access to the bicycle parking. It is anticipated that, overall, the proposed Project will provide for improvements to the public transport network, resulting in decreases in car usage/trips, increases in public transport usages, and will facilitate walking and cycling to the stations, without significantly impacting on the operation of the networks in the area. There may be a requirement for further work in conjunction with DCC to determine full effective mitigation measures, such as reconfiguration of street furniture or reallocation of space to maximise available width.

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17	What we are looking for	13	We appreciate that Dublin City Council may have workable solutions that could address our concerns and Iona District residents are happy to engage with authorities and agencies involved in the Metrolink project and give whatever support may be required in implementing any solutions.	As noted in response item (8), a Project Construction Traffic Forum will be established with representatives from key stakeholders to liaise on issues arising from the construction traffic movements and traffic management plans. As detailed in Chapter 8 (Consultation), early and continuous public participation has influenced the design and development of the MetroLink project. TII are committed to maintaining engagement with local stakeholders throughout both the construction and operational phases.