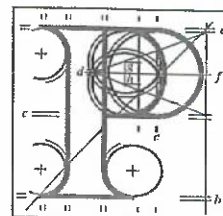


Our Case Number: ABP-314724-22



An
Bord
Pleanála

Iona and District Residents Association
C/O Rory Flynn
16 Iona Park
Glasnevin
Dublin 9
D09 Y1F7

Date: 23 January 2023

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

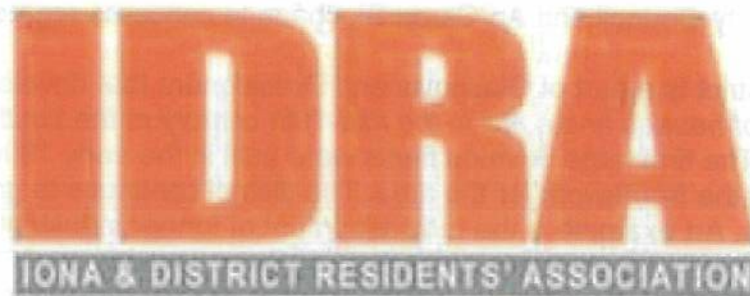
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Submission by Iona and District Residents Association (IDRA) to An Bord Pleanála on the Metrolink (314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin)

Submitted on behalf of IDRA by: Rory Flynn, 16 Iona Park, Dublin 9, D09 Y1F7. Tel: 086 8277528. Email: flynn.rory@gmail.com

Original submission

Reference: SID-OBS-000943

Date: 24 November 2022

Amended submission

16 January 2023

The amendment consists of an extra section starting on p3. It is titled "Long-term impact, NTA modelling and forecast traffic growth in and around Iona District" and continues to p5.

Observations

Metrolink has the potential to have a powerfully positive transformative impact on its immediate catchment area and the broader city. We welcome the proposal and look forward to the inception of services.

Iona District is the residential area bounded by; Whitworth Road, Drumcondra Road Lower (N1), Botanic Avenue, and Saint Mobhi Road - Botanic Road - Prospect Road (R108). This, almost entirely, residential area has experienced a growing cut-through traffic problem in recent years. The volume and behaviour of cut-through traffic is now degrading the residential character of the area.

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.

Background

Iona & District Residents' Association and individual residents have, for many years, alerted Dublin City Council and An Garda Síochána to concerns regarding traffic in Iona District.

Iona District is a part of Glasnevin and Drumcondra that developed *"from an unremarkable cluster of houses and a mill in the mid-19th century to the bustling modern suburb it is today"*. The first large developments were built in the early 1900s, on a grid pattern which still sets the framework for the area. The district continues to grow and change as the city changes. An example is the redevelopment of former industrial facilities for residential use.

We believe that the living environment in the district has become increasingly unsafe and unhealthy for residents, especially for children and vulnerable adults, due to a number of traffic-related issues on our streets.

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.

Department of Transport Traffic Management Guidelines have struck a chord with many of the city's residents groups and are worth repeating here. These highlight the value of achieving an environment that is safer and accessible for all.

"Streets are (or ought to be) living spaces, an integral part of the community and the focus of many activities that link together people's lives. The way in which streets are managed and used promotes or discourages a sense of community and makes them an attractive or unattractive place to live. This imbalance must be reversed if urban communities are to revive and prosper. Planners and engineers must take the lead in this process. The introduction of a road hierarchy and the management of traffic onto appropriate roads is a fundamental step in this process."

"There are many examples where the road design and speed of traffic has discouraged pedestrian and cycle movement because of concerns over safety. It has also led to the creation of areas that are too similar and lack their own sense of local identity."

We are also encouraged by the drafting of Dublin City Development Plan 2022-2028 which includes a commitment to sustainable neighbourhoods and movement. The original district developments were made in a very different era, the time has now come to build on the organic growth of the neighbourhood to ensure a safe, secure, age-friendly, accessible, walkable and healthy neighbourhood, in line with the aspirations of the City Development Plan.

Metrolink

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.

There are two parts to the impact of these projects on Iona District.

Impact during works period

The first is the impact during works. During recent road works around Harts Corner (road resurfacing for a few consecutive evenings) it was clear that there was a pickup in traffic though 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.

Long-term impact, NTA modelling and forecast traffic growth in and around Iona District

The second impact arises once works are complete.

The MetroLink proposal data pack includes a comprehensive set of traffic forecasts. These are produced by the National Transport Authority (NTA) as part of their Eastern Regional Model (ERM).

An important portion of these forecasts contrast DS (Do Something, ie build Metrolink) versus DM (Do Minimum, not specified in detail but likely a continuation of normal road network adjustments) impacts for a variety of dates following the introduction of Metrolink.

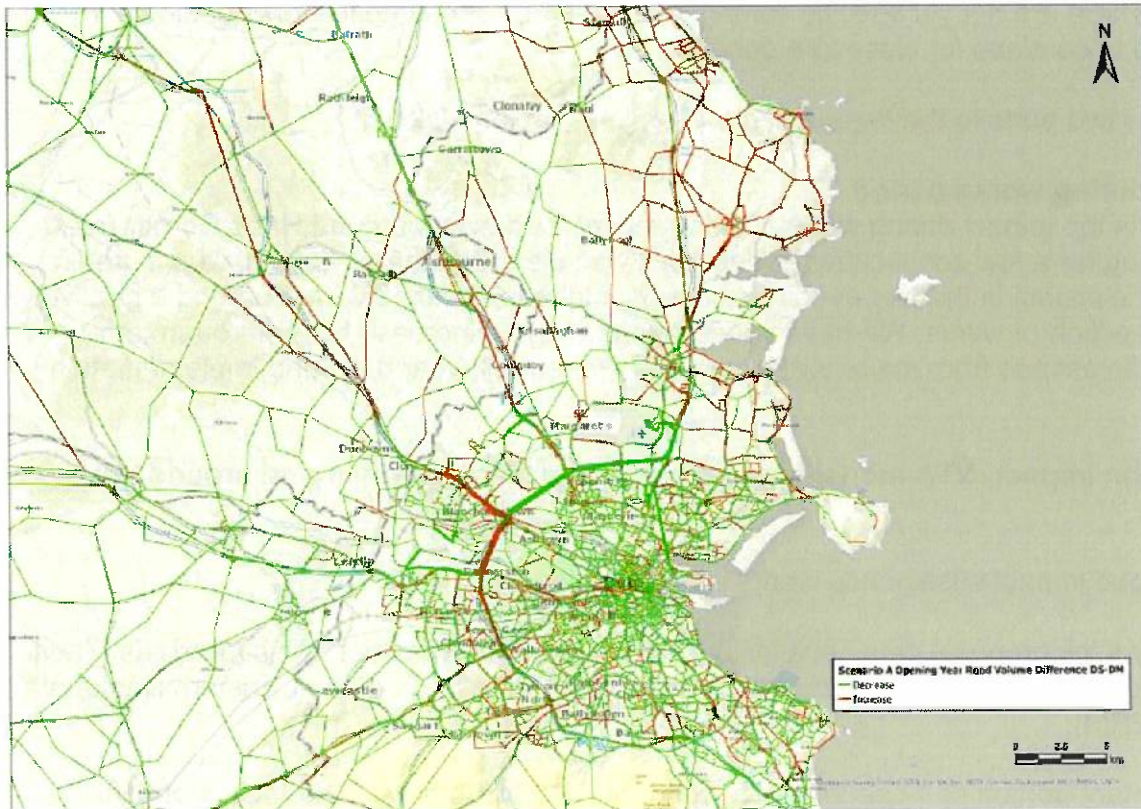


Figure 6.21: Highway Model – Flow Changes Scenario A 2035 AM Peak

Figure 1 Excerpt from A9.4 Traffic and Transport Modelling Report

An example of the output of the model is shown in the Figure. “Figure 6.21 displays the AM difference in traffic flows on the highway network with the Project in place, the red shows an increase in flows and the green shows a decrease in flows.” (p61 A9.4 “Traffic and Transport Modelling Report”)

The broad conclusion is that traffic will be better (roads marked in green), but that some routes will see increased traffic (roads marked in red).

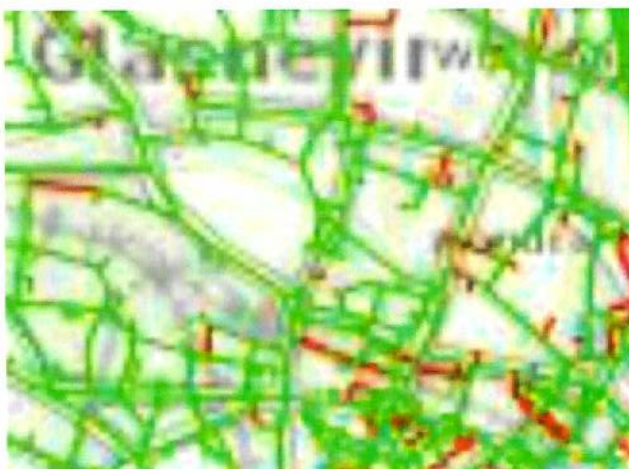


Figure 2 Excerpt from previous Figure

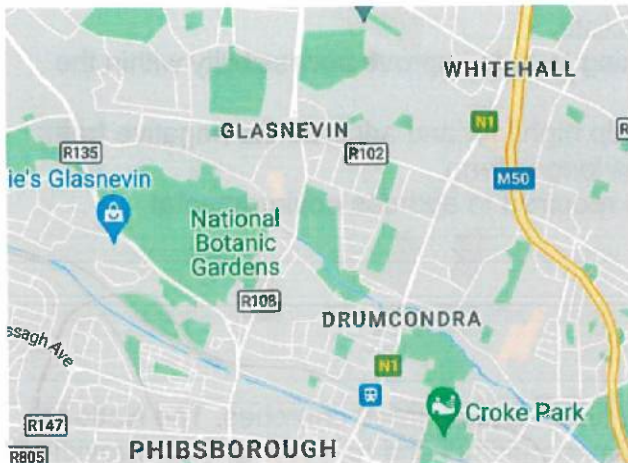


Figure 3 Street map of the area shown in previous figure. No model overlay. Source: Open Street Maps

The model goes into a level of detail which is not clearly reproduced in the proposal documents, hence the lack of clarity seen in Figure 2. Figure 3 shows a map of approximately the same area without the NTA ERM overlay for comparison.

Looking at the detail of the figure it seems clear that two roads in or around Iona District are forecast to see increased traffic. Best estimate is that these are Whitworth Road and St Annes Road. Iona District is forecast to experience reduced traffic.

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 spillover 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.

Residents' concerns

While the district still has a significant number of older residents, the changing demographic mix has seen an increase in families with young children who attend local schools and use nearby sports and recreational activities.

Residents have, for a number of years, raised issues of concern relating to:

- Cut-through routes going through residential roads,
- speeding in the 30km/h zone,
- vehicles of greater than 3.5 tonnes driving through the district,
- drivers ignoring yield, stop and other signage,
- cars and vans parked on paths and corners

In this document we will highlight the areas of concern. 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.

Safety issues

The district contains two primary schools, three creches, and three churches. The National Council for the Blind of Ireland (NCBI) is based in the district and has two facilities providing training for people with visual impairments. Primary and secondary schools, parks and recreational facilities in the immediate vicinity are attended and used by children from the district who live within walking and cycling distance.

The district is bordered by local shops, post offices, bars and cafes on; Drumcondra Road Lower, Botanic Avenue, Road, Drumcondra Road, St Mobhi Road, Botanic Road, and Whitworth Road that residents walk to.

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.

Cut through routes

There are a number of cut-through routes in the district. Much of this motor traffic passes through in rush hours, with a steady volume in shoulder hours, i.e. the hours before and after rush hour. A substantial portion of the motorists who cut through drive at excessive speed ignoring road signage.

The district has a mix of large and small cut-throughs. One of these routes is used to avoid just one set of traffic lights, most are used to avoid multiple traffic lights, skip bus lanes and bus stops. The overall mix can seem complex, this graphic and text are an attempt to describe the major flows. Flows mentioned here are typically two-way with equivalent numbers traveling in both directions.

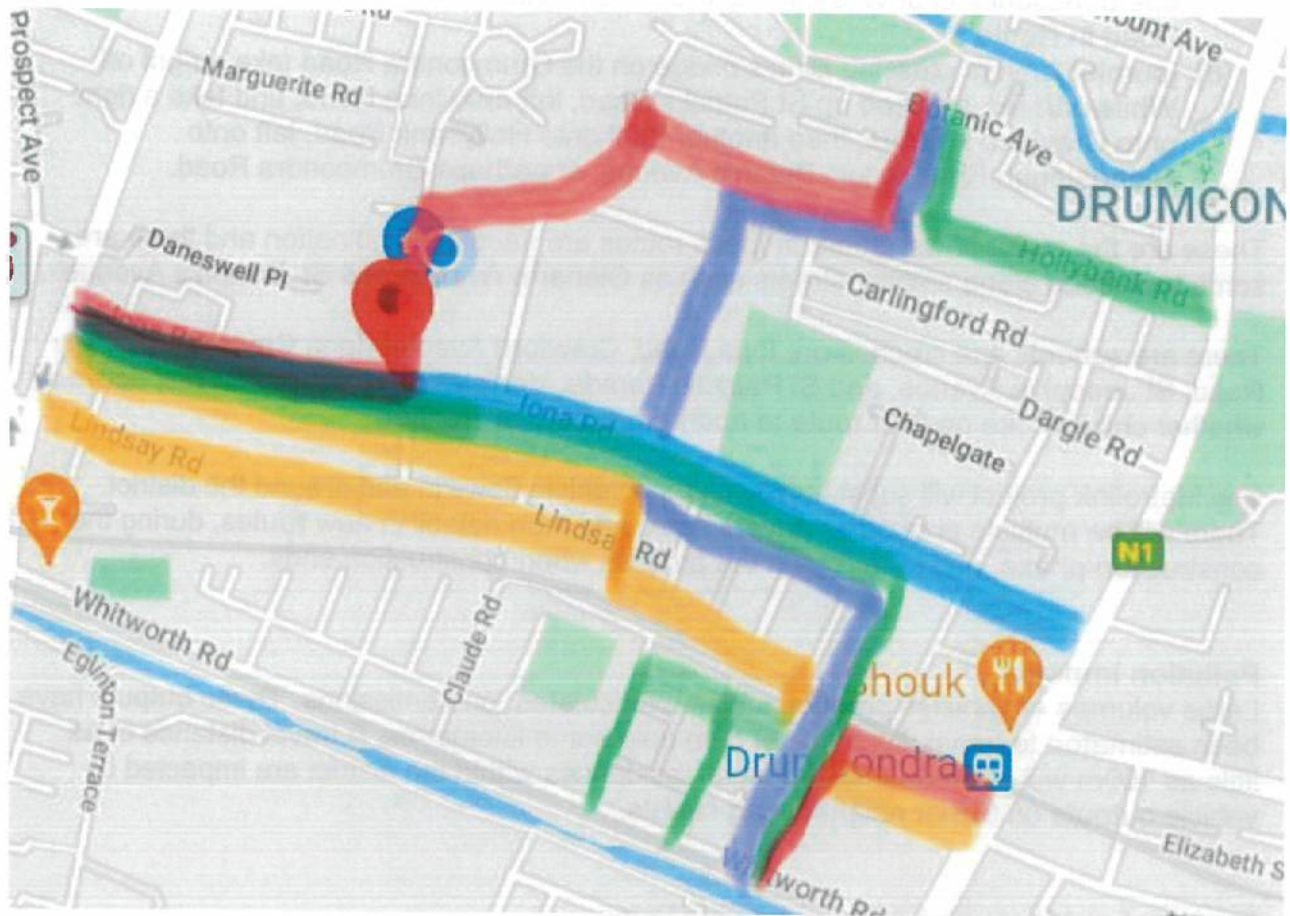


Figure 4 Iona District and residents' estimates of main cut through traffic flows

- 1) [red, mid left to top right] Motorists turn left onto Iona Road, left onto Iona Park, then Iona Crescent and Hollybank Road taking a left onto Glendalough Road.
- 2) [green, top right] Some motorists, seeking to avoid one set of traffic lights, take a right off Botanic Avenue, then a left onto Hollybank Road and back onto the Drumcondra Road.
- 3) [blue, centre] The highest volume of traffic through the district takes a left off Botanic Road onto Iona Road, proceeds at speed along Iona Road and St Alphonsus Road Upper and Lower (hereafter St Alphonsus Road) to Drumcondra Road. The narrowness of the last section of St Alphonsus Road means that car owners park on the footpath to avoid having their vehicles damaged by aggressive drivers.
- 4) [green, left-centre to bottom right] some portion of Iona Road traffic avoids the bottleneck on St Alphonsus Road by taking a right onto St Patricks Road, exiting to Whitworth Road. Residents have observed some portion of cars at peak times taking a right off St Patricks Road onto St Annes Road, and even St Clement's Road, before turning onto Whitworth Road. This adds distance but avoids tailbacks on the southern part of St Patricks Road.
- 5) [yellow, centre left to bottom right] Motorists turn left and right from Drumcondra Road onto St Anne's Road, then right onto St Patricks Road before weaving through St Patricks Parade, St Columba's Rd Upper and Lindsay Road. This flow tends to be

one directional as drivers coming the other direction have probably turned onto Iona Road in Route 3.

- 6) [purple] Drivers crossing Binn's bridge on the Drumcondra Road take a right off Whitworth Rd, proceed up St Patricks Road, left onto Iona Road, and take a right onto Crawford Avenue, then another right onto Hollybank Road, left onto Glendalough Road to join Botanic Avenue, or perhaps Drumcondra Road.

These are the major flows. Some of these routes are used in combination and there are some variations along smaller streets such as Glenarm Avenue and St Joseph's Avenue.

There are schools and creches on; Iona Road, Crawford Avenue, Iona Crescent, Lindsay Road, St Joseph's Avenue, and St Patricks Parade. Vehicles drive at speed irrespective of whether children are on their route to and from school or creche.

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.

Pollution impacts

Large volumes of vehicles produce; noise, particulates, and emissions. These outputs have been estimated to travel distances of 50m upto 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.

Impact of cut through traffic on bicycle lanes

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 accident risk and impeding cyclists.

There are two intersections that are simply busy, and a number that are more dangerous. The busy intersections are;

- The left turns from Botanic Road onto Iona Road and Lindsay Road,
- The turn from Botanic Avenue onto Glendalough Road.

The more challenging intersections are;

- The turn from Drumcondra Road onto St Anne's Road
 - o Outward bound vehicles enter St Annes Road by turning left across the bicycle lane. Inward bound vehicles also enter St Annes Road, by taking a right off Drumcondra Road. The vehicles turning right onto St Anne's often cannot see oncoming bicycles as the bicycles are behind two lanes of oncoming vehicles.
- Intersection of St Patricks Road and Whitworth Road.
 - o Cars queuing for the lights from Whitworth to Drumcondra Road make it difficult for right-turning vehicle drivers to see oncoming bicycles on Whitworth Road.
- Intersection of Hollybank Road and Drumcondra Road.

- The bicycle lane is set back from the road and a combination of; trees, railings and mixed lighting conditions can mean that drivers find it very difficult to see cyclists,
- Inward bound vehicles taking a right turn off Drumcondra Road negotiate two lanes of motor vehicles before crossing the cycle lane.
- Cars exiting Hollybank Road are negotiating two or more lanes of vehicles and a bicycle lane, with motor and bicycle traffic travelling indifferent directions at different speeds.

30km/h speed limit

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.

Iona district residents have gotten funding for a number of Telraam devices through WeCount project on ChangeX.com . Telraams (www.telraam.net) are *"..a combination of a Raspberry Pi computer, sensors, and a low resolution camera.."* that function as an automatic traffic counter. The Belgian Data Protection Authority has issued an opinion that Telraam *"..does not..involve any processing of personal data"* and therefore does not require GDPR policies. Telraam devices collect data during daylight hours.

Data from Telraam devices on Iona Road, Iona Park, Lindsay Road, Crawford Avenue, and St Clement's Road has shown that v85 (*"..the 85th percentile speed...gives an indication of the typical speeds driven at a specific Telraam location.."*) is typically in excess of the 30km/h speed limit. The devices indicate that 30%-40% of vehicles exceed the speed limit. The charts below show data for a Telraam device located on Iona Road.

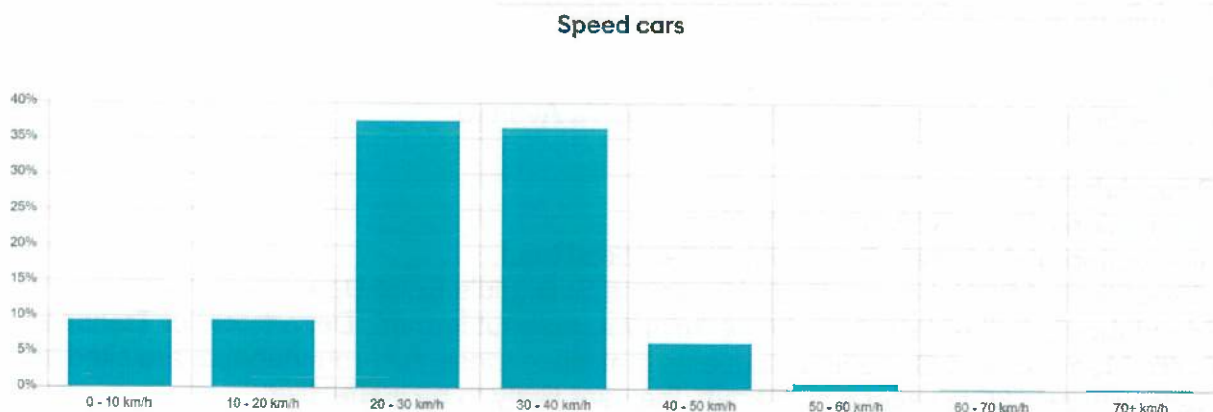
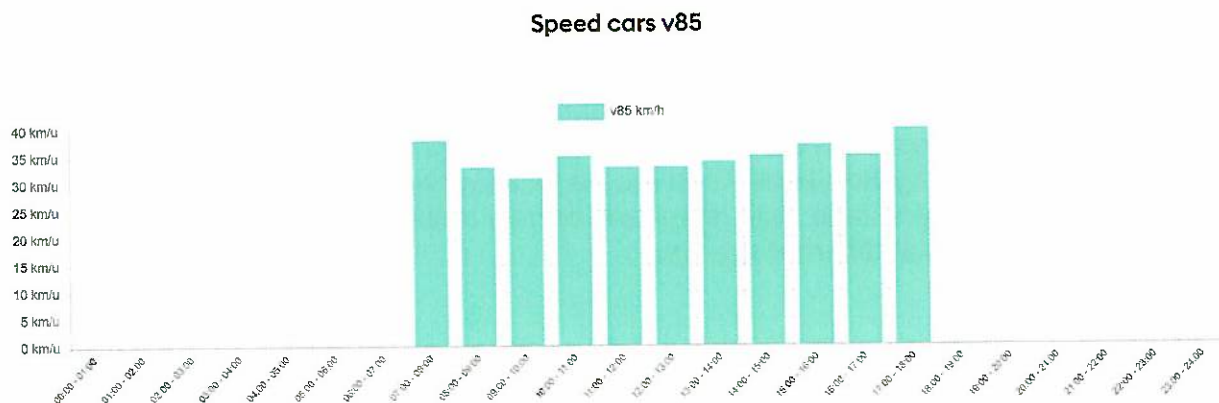


Figure 5 Speed analysis output from Telraam device in Iona District



① The V85 is a widely used indicator in the world of mobility and road safety, as it is deemed to be representative of the speed one can reasonably maintain on a road. [Read more about V85](#)

Figure 6 v85 data produced by Telraam device in Iona District

This speed limit is ignored by motorists daily. Data can suggest that more motorists observe speed limits at peak times or when children are going and from the local primary schools, but observation suggests that this is because the volume of traffic impedes oncoming vehicles.

Large vehicles

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.

Road signage

The following signs are regularly ignored by motorists.

‘Yield’

Intersection of St Anne’s Road and St. Joseph’s Avenue.

‘Roundabout’

Intersection of Iona Road and Iona Park.

Intersection of St Anne’s Road and St Patrick’s Road.

Intersection of St Alphonsus Road Upper and St Brigid’s Road Upper

Roundabouts in the district are in the “mini-roundabout format”. Department of Transport Traffic Management Guidelines suggests that since these mini-roundabouts are sited in roads with an v85 in excess of 30km/h, they are likely to be ineffective.

‘No Left Turn’

Junction of Whitworth Road and Phibsborough Road.

This is less frequently observed, but when it occurs it means that vehicles are driving through a green pedestrian/bicycle light. This pedestrian/bicycle junction is on the Royal Canal path which in turn is part of the EuroVelo 2 “Capitals Route”.

‘No Right Turn – Time restricted’

From Botanic Avenue onto Mannix Road

'Maximum Gross Weight 3.5t'

All roads into district from arterial roads

Traffic Light

Traffic light at pedestrian crossing on Iona Road

'Children crossing'

School on-road markings

Crossing grid

'School traffic warden'

Lindsay Road, Iona Road and Crawford Avenue.

School wardens are present at school start and end times. Many children exit adjoining church grounds on Iona Road.

Wardens have described the situation as; "mad", and dangerous" and reported a range of dangerous vehicle behaviours. One warden said the situation was "worse than" a nearby arterial route with a 50km/h limit. There is no evidence that motorists on Iona Road moderate speeds at school times.

Car parking

There are sections on St Alphonsus Road and St Patricks 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.

Some parked vehicles belong to residents, an increasing number of cars are owned by people from outside the district who park during the day and night and take buses, trains, cycle or walk the remainder of their journey.

Narrow footpaths

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.

Dealing with issues to date

Iona District Residents' Association and individual residents have for a number of years brought traffic concerns to the attention of Dublin City Council and An Garda Síochána.

These concerns have been addressed through;

- mini roundabouts, and signage on those roundabouts,

- no right turn during certain hours onto Mannix Road,
- speed and size restrictions, and signs on entries to the district off arterial roads,
- traffic lights on Iona Road,
- footpath adjustments on Iona Road and Crawford Avenue, Iona Road and Gartan Avenue, Lindsay Road and Gartan Avenue, and Botanic Road and Iona Road,
- school themed bollards and road colouring on Crawford Avenue and Lindsay Road,
- speed bumps on Hollybank Road and Iona Road.

These are ignored daily. The district now has multiple established cut-through routes.

Data from Telraam devices for recent months shows an average of over 300 motor vehicles per hour proceed along Iona Road at peak times, with smaller numbers (though still in excess of one per minute) on Crawford Avenue, Lindsay Road and Iona Park. On some days over 4,500 motor vehicles travel through Iona Road during daylight hours.

Regular complaints to An Garda Síochána have resulted in occasional traffic policing. This results in a slight decrease for a few days, and then traffic returns to high numbers again.

What we are looking for

The number of issues we have highlighted are cause of concern in relation 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.

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 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.

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.