

Re: Bus Connect- Finglas to Phibsborough Preferred Route Ref. 3909/21

The residents of Leinster Street North, Phibsborough, Dublin 7 have examined the drawings and documents for the above application along with previous consultations with the Bus Connects project and its significance to our area. While we welcome the proposals and look forward to improvements in bus and cycle infrastructures, we wish to submit our observations below.

1. Introduction

Phibsborough Village in its nature is close to being a “15 minute city”, which is an idea embraced by Dublin City Council Development Plan, Housing For All, and the national planning frameworks. As residents, we enjoy our neighbourhood’s proximity to the city centre, schools, places of employment and amenities - cycling and pedestrian accessibility is key to its functionality.

In the previous round of Bus Connect consultations, the National Transport Authority (NTA) acknowledged the negative impacts of the proposals on Phibsborough: the significant increase in traffic directed towards Phibsborough village, in particular through Connaught Street. As residents, we saw the greater good behind these proposals. The current submission, with its proposed changes, is a significant departure from the previously consulted proposals and imposes additional negative impact on our neighbourhood.

In her observation to An Bord Pleanála, Cllr Marie Sherlock highlighted a number of issues with the current Bus Connect proposal and how they will significantly negatively impact us (we will not repeat them here). Leinster Street North residents fully concur with the issues and requests made therein with regards to the Phibsborough area a whole, however, we would like to comment further on the following aspects of the proposed scheme directly affecting Leinster Street North:

- Proposals to restrict traffic from the Old Cabra Road
- Stopping access southbound on Annamoe Terrace and Annamoe Road
- Stopping southbound access to the North Circular Road from Charleville Road

The above proposals, in their attempt to balance the impact of additional traffic on Cabra, will offload the very same traffic onto the already burdened Phibsborough Road, with no mitigating measures.

2. Context.

Leinster Street North is a narrow one-way street, extending east-west. Vehicles are permitted to enter from Phibsborough Road, exiting through Ulster Street or Shandon Road onto Connaught Street. There is a low raised ramp at the entrance off Phibsborough Rd and a 30km/h speed limit on the street. The wider section at the entrance (junction with Phibsborough Road) facilitates illegal U-Turns, which is hazardous to cyclists and motorists entering the street.

DCC parking arrangements permit overspill parking on Leinster Street North by residents of neighbouring streets.

A two-way cycle “contra-flow” system on Leinster Street North is in place for cyclists. It is a well-used route in both directions and allows cyclists to bypass the busy junction at Connaught St and Phibsborough Road and the stretch of Connaught Street between Phibsborough Shopping Centre and St. Peter’s Road. The cycle route is particularly valuable for local school-children traveling to schools in Cabra and Glasnevin. There are very few alternative cycle routes in the area.

3. Existing Issues.

3.1 Speeding/ Rat Run

There is an ongoing issue with speeding vehicles on Leinster Street North (in both directions). There are no active traffic calming/ anti-speeding measures in place and existing signage and road markings appear to be ineffective. The speeding issue was raised by the residents to DCC in a letter

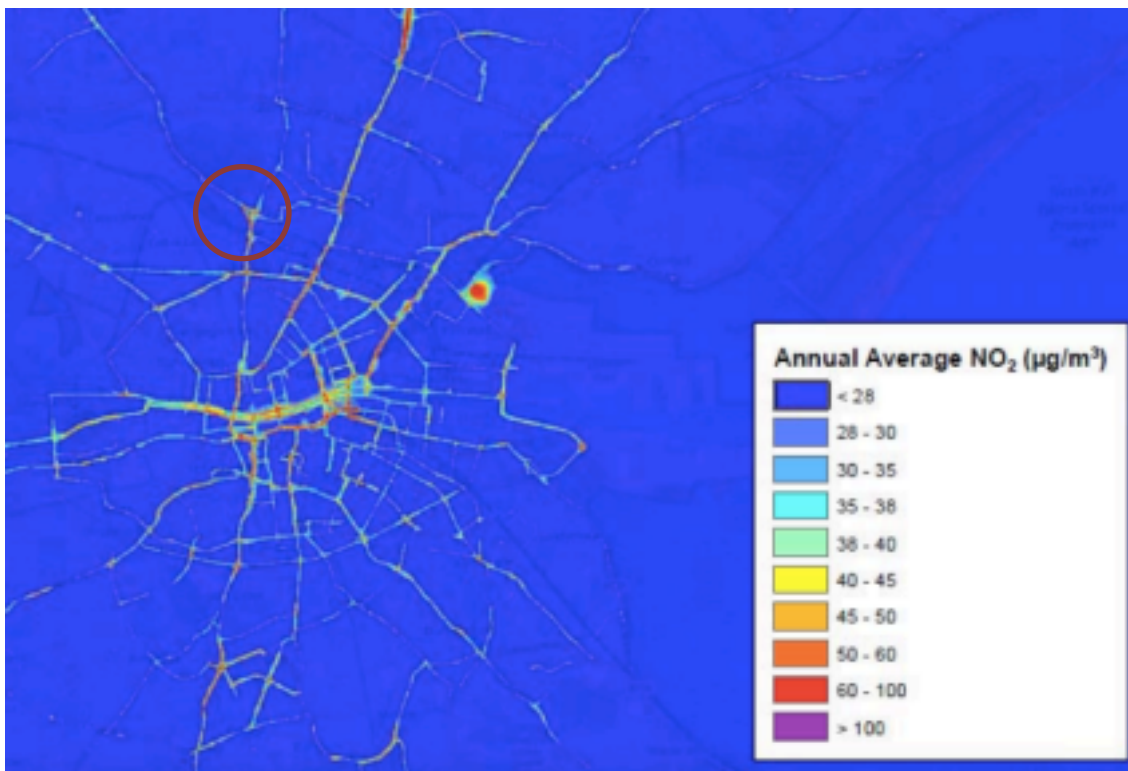
dated October 2020, attached for reference.

Leinster Street North is frequently used as a rat run between Connaught Street and Phibsborough Road, in both directions. Motorists knowingly break the rule of the one-way system and race eastwards towards Phibsborough Road, in order to by-pass the traffic lights at the junction of Phibsborough Road and Connaught Street. This issue was formally highlighted by residents in a letter to DCC traffic department and local councillors in October 2020. The letter documented 36 separate instances of drivers travelling the wrong way, surveyed during the daytime hours of one week. To date, no action has been taken to address this issue and it persists.

Safety for cyclists in the context of speeding vehicles, often in the wrong direction, on a narrow street with high parking demand, is of significant concern as there is insufficient space for a car and a cyclist to pass each other. The contraflow cyclists heading eastwards rely on low volume of cars and the cars need to slow down substantially in order to let cyclists pass.

3.2 Existing Air Quality

Phibsborough Road is a perpetual traffic jam for most of the day, seven days a week. EPA air quality report from 2019 noted NO₂ concentrations in excess of statutory EU limits in many areas in Dublin. The diagram below (measured in 2015) identified excessive annual NO₂ around Phibsborough Road, between Hanlon's Corner and North Circular Road.



Modelled annual average NO₂ concentrations for 2015 in Dublin

Figure 5 from EPA Report, Air Quality in Ireland 2019 [Phibsborough highlighted by author]

4. Observations in Relation to the Bus Connect- Finglas to Phibsborough Preferred Route

4.1 Negative Impact of Additional Car Traffic on Leinster Street North and Adjacent Streets

Retaining Shandon/ Leinster/ Ulster/ Munster Streets as low traffic is extremely important to the community. Additional traffic volumes on Connaught Street will increase the attraction of Leinster Street North, a narrow residential street, as a rat run, to the detriment of all road users. It will exacerbate all of the issues outlined above. No mitigation measures safeguarding pedestrians/ cyclists are proposed by Bus Connect.

- We request An Bord Pleanála, by way of a condition, to request measures to discourage access to Leinster Street as a rat run to Connaught Street.
- We ask An Bord Pleanála, by way of a condition, to provide meaningful measures to prevent cars traveling in the wrong direction down Leinster Street North, as a rat run to Phibsborough Road.
- We also request NTA/ An Bord Pleanála, by way of a condition, to review the design/ road marking of our streets to prevent rat runs, and reduce speed limits from the current 30km/h to a speed appropriate for a shared car/cycle surface.

4.2 Negative Impact on Air Quality and Pollution.

The air quality report submitted as part of the statutory documents for the current phase of Bus Connect states: *“During the Operational Phase, the potential air quality impacts associated with altered traffic flows along the Proposed Scheme, reallocated traffic lanes and displaced traffic flows have been assessed.”* When assessing the residual impacts of the scheme during the operational phase, the Air Quality Report concludes that: *“The air dispersion modelling assessment has found that the majority of all modelled receptors are predicted to experience negligible impacts due to the Proposed Scheme”.*

While the Air Quality report refers to the location of the receptors in Phibsborough in Figures 7.3 to 7.5, their locations are not actually stated in those tables. In Table 7.19, the receptors are identified only by way of an ITM co-ordinates and cannot be linked to their actual locations within the proposals. The report acknowledges and models an increase in traffic congestion along Phibsborough Rd and Old Cabra Rd. A summary of the modelling of air quality in those locations is missing from the report, however it would be fair to conclude that the increase of traffic congestion will lead to an increase in NO2 concentrations and other pollutants.

The air quality report reassures us that air quality will improve over time. 2048 is given as the year the ambient air quality is expected in all locations, 20 years post completion of the project and fully dependent on *“reductions in emissions between 2028 and 2043 from advancements in engine technology and the addition of a higher percentage of electric vehicles to the fleet.”* We note Ireland’s emissions are at present growing steadily, rather than decreasing, and cars are getting bigger eliminating gains from engine efficiency. Waiting until 2048 is not good enough for our community. As citizens, we have a right to clean air. According to European Environment Agency, the health impacts of air pollution are significant and NO2 levels impact our livers, spleens and blood. **No government project should result in the deterioration of air quality in our neighbourhood**, which is what the current phase of Bus Connect appears to be proposing for Phibsborough in re-routing significant volumes of traffic to our neighbourhood.

We acknowledge that measures to reduce air pollution by reducing the numbers of cars coming into the city in the first place don’t appear to be within the remit of this phase of Bus Connect.

- We request An Bord Pleanála, by way of a condition, a requirement for measures to prevent deterioration of air quality in Phibsborough as result of current proposals from the time of the project completion, rather than 2048.
- We request air quality/ noise monitors to be installed, with mitigating measures set out in the event of pollution levels exceeding WHO and European Environment Agency baselines.



Kind Regards,

Katia Papkovskaia MRIAI
33 Leinster Street North, Phibsborough, Dublin 7

On Behalf of Leinster Street North Residents Group

APPENDIX A

Letter to DCC/ Local Representatives October 2020

Leinster Street Residents Group
c/o Laura Kelly,
4 Leinster Street North,
Phibsborough,
Dublin 7

Paschal Donohoe TD,
344 North Circular Road,
Phibsborough,
Dublin 7

Re: Dangerous and illegal driving on Leinster Street North

Dear Minister Donohoe,
cc. Cllr. Colm O'Rourke

I am writing on behalf of Leinster Street Residents Group to express our ongoing concerns regarding dangerous driving on Leinster Street North in Phibsborough.

- Leinster Street North is a one-way street with a contra-flow system in place for cyclists. Street signs clearly identify the speed limit (30kmph) and "No Entry" at the top of the street for all vehicles (except cyclists). However, street signage is proving ineffective as a deterrent. In the past week alone, residents have recorded at least 36 cars driving down the street in the wrong direction at extremely high speed (Appendix 1).
- In recent months, traffic signaling schedules in Phibsborough village have changed with the unintended consequence being a further increase in traffic as motorists use our road as a "rat run" to avoid the busier junction at Connaught Street and Phibsborough Road.
- The wider section at the entrance to Leinster Street (at the junction with Phibsborough Road) facilitates drivers doing illegal U-Turns, which is hazardous to cyclists and motorists entering the street.

Needless to say, the risks of a head-on collision on such a narrow street with poor visibility of pedestrians (due to parked cars) is extremely high. While there have been no casualties or fatalities resulting from this dangerous driving to date, there have been multiple near-miss incidents. With many elderly residents, a growing number of young families with children and an increasing number of pedestrians walking into the road to maintain social distancing due to COVID-19, the risk remains. We are highlighting this now to prevent future road fatalities in the Phibsborough area.

This issue has been raised by residents multiple times in recent years, both with local representatives and with the Gardaí directly. In 2017, your own office organised for road markings to be repainted. In September 2020, the issue was raised by Cllr. Colm O'Rourke at the Dublin City Council Central Area Committee meeting. The response received by Cllr. O'Rourke (Appendix 2) was less than satisfactory, completely failing to grasp the nature of the problem. Residents feel a comprehensive action plan is needed to tackle this issue aggressively.

The Gardaí have assured us that they will increase surveillance of the area (in addition to residents reporting incidents of dangerous driving directly to the Gardaí). However, we do not feel that this represents a long-term solution to the problems outlined above.

We would like to explore the possibility of introducing the following measures on Leinster Street North (illustrated in Appendix 3):

1. Further reviewing signage on the street, including repainting existing road-markings (Appendix 4).
2. Installation of safety/speed cameras at the top and bottom of the street.
3. Road narrowing bollard/diversions (e.g. widen the path outside the Nail Salon) to deter motorists from doing illegal U-turns at the entrance to Leinster Street.
4. A yellow box in the outbound lane at the junction of Phibsborough Road (for those turning right onto the street), due to the overall increase in traffic in Phibsborough area and impact on access to our street.
5. Speed-bumps on the street to deter opportunistic motorists speeding down the street in the wrong direction (residents have some reservations about this option so would only explore this as a potential future measure if the above were ineffective).

We would appreciate your assistance in addressing the above issue as a matter of urgency and look forward to hearing from you.

Yours sincerely,

Laura Kelly

On behalf of Leinster Street Residents Group (co-signatories below)

Alice O'Dwyer	1 Leinster St. North
Paul O'Dwyer	1 Leinster St. North
Laura Kelly	4 Leinster St. North
Peter Kelly	4 Leinster St. North
Aileen Finnegan	8 Leinster St. North
Ciaran Moroney	8 Leinster St. North
Audrey O'Donnell	9 Leinster St. North
Stella O'Callaghan	14 Leinster St. North
Tara O'Callaghan	14 Leinster St. North
Brendan Scollan	16 Leinster St. North
Theresa Scollan	16 Leinster St. North
Siofra Coffey	17 Leinster St. North
Eugene Donohoe	18 Leinster St. North
Kevin Breslin	19 Leinster St. North

Sandy Breslin	19 Leinster St. North
Carina Fitzgerald	22 Leinster St. North
Cailee Steninger	22 Leinster St. North
Joe Keegan	24 Leinster St. North
Joanna Keegan	24 Leinster St. North
Elizabeth Gill	27 Leinster St. North
Lynn Harnedy	28 Leinster St. North
Katia Papkovskaia	33 Leinster St. North
Gemma Clarke	35 Leinster St. North
Val Cassidy	35 Leinster St. North
Sean Cassidy	35 Leinster St. North
Maeve O'Boyle	37 Leinster St. North
Jordan Montminy	37 Leinster St. North
Maria Browne	39 Leinster St. North
Sean Curneen	39 Leinster St. North
Sophie Lerner	40 Leinster St. North
Cian Reynolds	40 Leinster St. North
Dermot O'Hanlon	46 Leinster St. North
Anna Donnelly	46 Leinster St. North
Dave Ho	47 Leinster St. North
Julianne Ho	47 Leinster St. North
Natalie Kilroy	49 Leinster St. North
Brid Carter	53 Leinster St. North
Lily Hussey	55 Leinster St. North
Patrick Hussey	55 Leinster St. North

Appendix 1: Leinster St. illegal contraflow traffic (recorded on a video doorbell)

Leinster St Nth illegal contraflow vehicles

Mid Oct 2020

	Tue 13 Oct	Wed 14 Oct	Thur 15 Oct	Fri 16 Oct	Sat 17 Oct	Sun 18 Oct	Mon 19 Oct	Tue 20 Oct	Wed 21 Oct
AM	05:16:07	05:13:43 06:51:04 08:24:03	09:45:32 11:15:29	05:22:04	06:57:49 07:10:07			05:17:05	06:11:57 07:36:19
PM	15:29:09 15:49:28 16:31:25 16:38:10 16:41:42 16:41:55 16:57:42 17:00:24	15:41:51 15:41:57 15:49:47	12:15:17 13:50:40 Garda 17:35:41	14:21:31 14:42:48 16:04:26 16:16:43 17:25:58			12:58:20 16:13:05 16:35:27 17:10:28 17:15:58	15:05:26 16:48:46 16:51:19 16:51:31 16:51:46 16:55:45 17:05:06 17:28:20 17:28:23 17:54:04 18:27:20	(13:44: 15) (13:44: 25) 15:15:34
TOTAL	9	6	5	6	2		5	12	5
	36 at least for 1 week - Wed 14th to Tues 20th Oct.								
	NOTES: 1: () indicate vehicles seen by eye but not recorded by camera								
	2: The doorbell camera did not pick up all the vehicles as some were speeding excessively.								
	3: Vehicles included going down the wrong way - cars/vans/motorbikes								
	4: Data on the 13th of Oct shows less vehicles as J.Ho was standing at the start of the no entry signs from 4pm-4.30pm. She believes this deterred some drivers.								

Question to Area

Manager
Meeting

Central Area Committee

8th September 2020

Q20 Councillor Colm O'Rourke

To ask the Area Manager to request that the relevant officials in Dublin City Council address the issue of speeding vehicles at (details supplied). Although there is a contra-flow traffic system in place for cyclists - motorists are constantly driving down the street at high speed in the wrong direction. Due to the change in traffic signals in the village, this road has become a rat-run for motorists. Visibility of pedestrians is also poor due to the parked cars on street.

**Details: Leinster Street North,
Phibsborough**

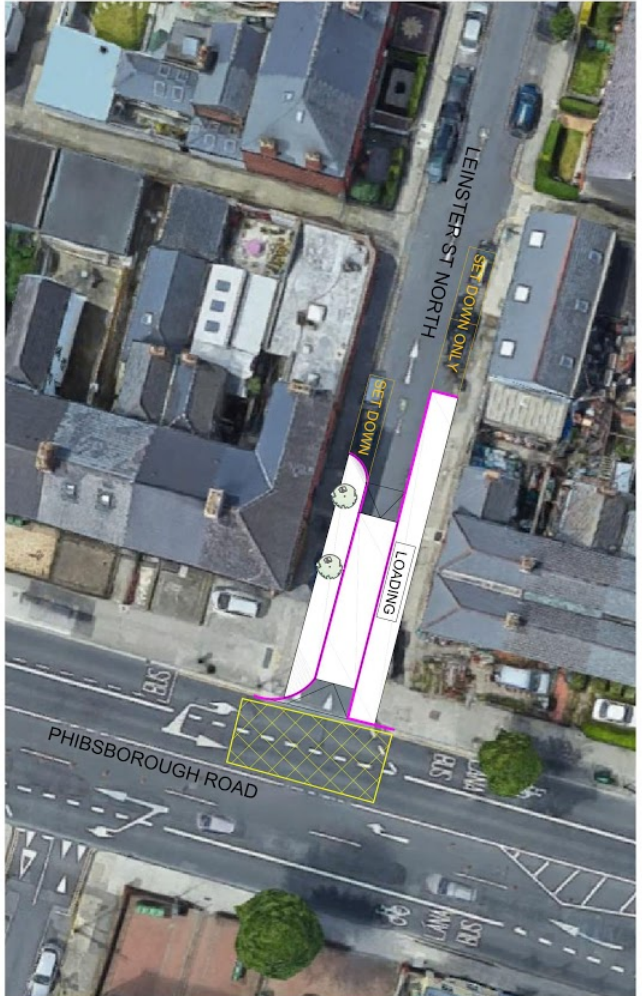
Reply

Leinster Street North is located in a 30 km/hr slow zone area. It is a short (less than 190 meters long) and narrow tree-lined street with parking on both sides of the road. There is a raised entry treatment ramp at its junction with Phibsborough Road. These measures serve to traffic calm the road, and as a result, drivers are unlikely to reach speeds in violation of the speed limit. However, the Gardaí will be informed on the issue of illegal/dangerous driving.

**Contact: Andrew Geoghegan,
Neighbourhood Transport Engineer (North City)**

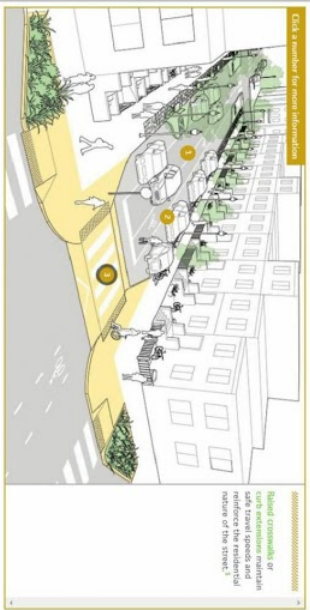
Appendix 3: Leinster St. Residents proposal

NOTES AND OBSERVATIONS TO BE EXCLUDED FROM THE EXAMINAL REPORT AND RESIDENT RECOMMENDATIONS TO BE REFERRED TO AS APPROPRIATE TO THE REPORT TO RESIDENTS TO ADDRESS.



Leinster Street Residents Group Propose

- Proposed upgrades to junction of Leinster Street and Phibsborough Road:
 - Increase raised Footpath Surface area to give pedestrian priority.
 - Narrow width of Junction and line with bollards to ensure drivers slow down, and deter drivers stopping close to junction
 - Yellow box of Phibsboro road to facilitate vehicle entry



- Proposed upgrades to Junction of Leinster Street and Ulster Street :
 - Monitored Camera installed
 - Island / Planting to narrow exit.
 - Signage upgrade showing 2no. No Entry Car Signs, showing Contra flow for Bicycles only

TRAFFIC

LEINSTER STREET RESIDENTS	DATE	TIME	LOCATION
Leinster Street, Dublin 7	2020OCT	G:00	

Appendix 4: Current state of road markings

