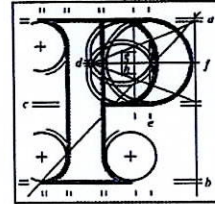


Our Case Number: ABP-317121-23



**An
Bord
Pleanála**

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

Date: 21 June 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

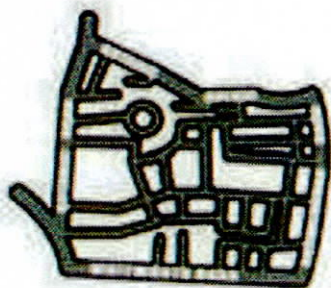
Teil
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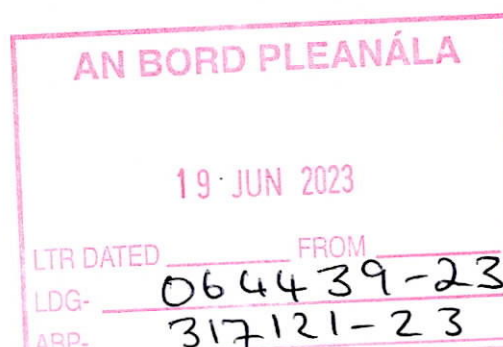
64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



Submission by Iona and District Residents Association (IDRA) to An Bord Pleanála regarding the BusConnects Swords to Dublin City Centre Core Bus Corridor Scheme (HA06D.317121: Swords to Dublin City Centre)

Submitted on behalf of IDRA by:
Rory Flynn, 16 Iona Park, Dublin 9, D09 Y1F7.
Tel: [REDACTED]
Email: [REDACTED]



June 2023

Conclusion

The Swords to City Centre proposal has the potential to substantially worsen cut-through traffic in the almost entirely residential Iona District. This cut-through traffic poses a risk to residents, and bicycle traffic, in and around Iona District. Appropriate traffic management within, and on the boundaries of Iona District, is needed if this scheme is to go ahead.

Summary

While the various BusConnects Core Bus Corridor Schemes have the potential to be powerfully positive for north county and city Dublin, there are some locations which will see worsened traffic and likely become more dangerous if not addressed.

These issues are summarised below and dealt with in greater detail in this document.

"Iona District" is the residential area bounded by; Whitworth Road, Drumcondra Road (N1), Botanic Avenue, and the section of the R108 known as Saint Mobhi Road/Botanic Road/Prospect Road.

a) The Drumcondra Road (which becomes the N1 and then the M1) is an extremely busy road. Motor vehicle traffic on this road already cuts-through (rat-runs through) Iona District seeking short-cuts. It is reasonable to forecast that increased congestion and volume on the N1 will push more traffic into Iona District.

b) Cross-city traffic will have a greater incentive to avoid the Drumcondra Road/N1. Cross city traffic is a substantial driver of motor vehicle volume in Iona District.

c) There are northbound bicycle lanes on the Drumcondra Road. Iona District contains four intersections which are already challenging and will become more so. Two of these are somewhat problematic;

- intersection of Whitworth Road and Drumcondra Road, and
- the intersection of Saint Alphonsus Road and Drumcondra Road.

Two of the intersections are more problematic due to combination of northbound/left turning traffic, and southbound/right-turning traffic. Specifically, the southbound traffic has to cross two vehicle and one (often hidden) bicycle lane. These more challenging intersections are;

- St Annes Road and Drumcondra Road,
- Hollybank Road and Drumcondra Road.

d) the mooted no-right-turn from St Alphonsus onto Drumcondra Road would push more traffic (currently 4,000 vehicles per day) onto St Patricks Road and St Brigid's Road. This is in addition to the right-turning traffic which is directed off Drumcondra Road onto St Anne's Road because of the no right turn at Binn's Bridge.

d) National Transport Authority forecasts are used to support the BusCorridor project. The NTA Eastern Regional Model does forecast traffic within the residential Iona District, but we have questions as to whether it does so accurately, and thus whether the model supports conclusions regarding traffic volumes in residential Iona District.

e) there is a lack of cross city/radial routes meaning that private vehicle traffic will be in greater demand. Cross-city (radial) rat-run traffic is a source of part of the excessive traffic volume in Iona District.

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, former industrial facilities are currently being redeveloped 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 city resident 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.

Bus Connects Core Bus Corridor Swords to City Centre

Two BusConnects corridors (Swords to City Centre and Finglas/Ballymun to City Centre), and 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 is not yet a set of 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.

The first is the impact during works. During recent road works on Prospect Road (minor 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.

We acknowledge that “you can’t make omelettes without breaking eggs”, major infrastructure projects will bring disruption. We would ask however that the project management to be adopted by both projects is planned to be for as short a time as possible in our and every other affected community.

The second impact arises once works are complete. New traffic flow patterns can create new cut through routes, a long-term traffic management solution can protect against future traffic challenges.

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

In this document we will highlight the areas of concern and we are requesting a review of traffic management in the district as part of the wider design of the Bus Connects and 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 impact to our community of ‘through’ traffic and vehicle seeding,

- 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 no 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.

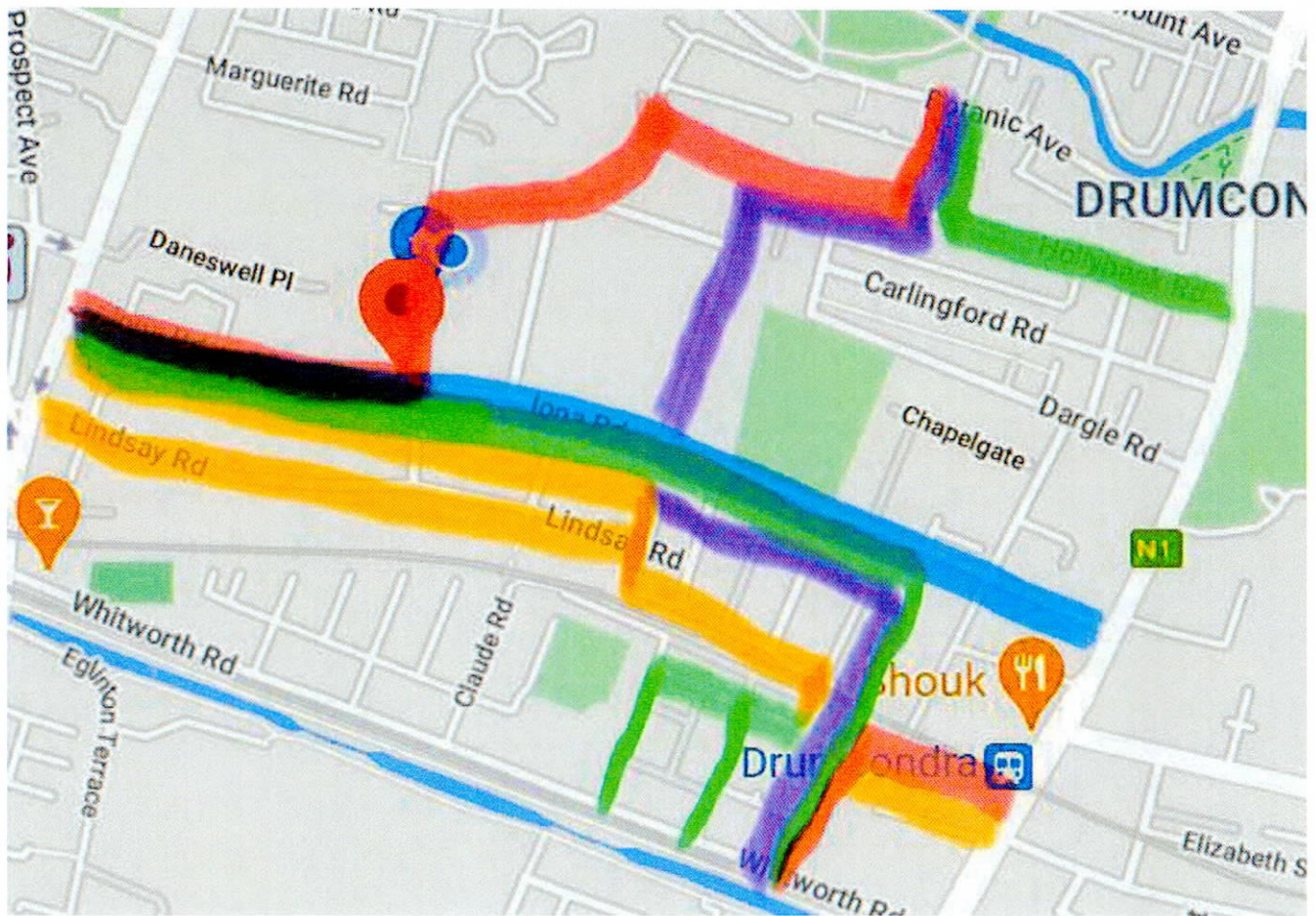
Over the years there has been a noticeable increase in the number of district residents who cycle on a daily basis. Many commuting cyclists choose to pass through the district as they travel to and from the city, or on cross city journeys.

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 (rat-runs) in the district. Much of this motor traffic speeds through the roads 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;

- 1) [red, mid left to top right] Motorists turn left onto Iona Road, on to Iona Park, then Iona Crescent and Hollybank Road taking a left onto Glendalough Road. Note; flows mentioned here are typically two-way with equivalent numbers traveling in both directions.
- 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] 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 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 Bus Connects and Metrolink projects 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 are estimated to travel from 50m upto some kilometres. A 100m travel distance 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 Vehicles enter St Annes Road by turning left across the outward bound bicycle lane. 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.
 - o 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,

- Southbound cars 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 lanes of vehicles and a bicycle lane.

30km/h speed limit

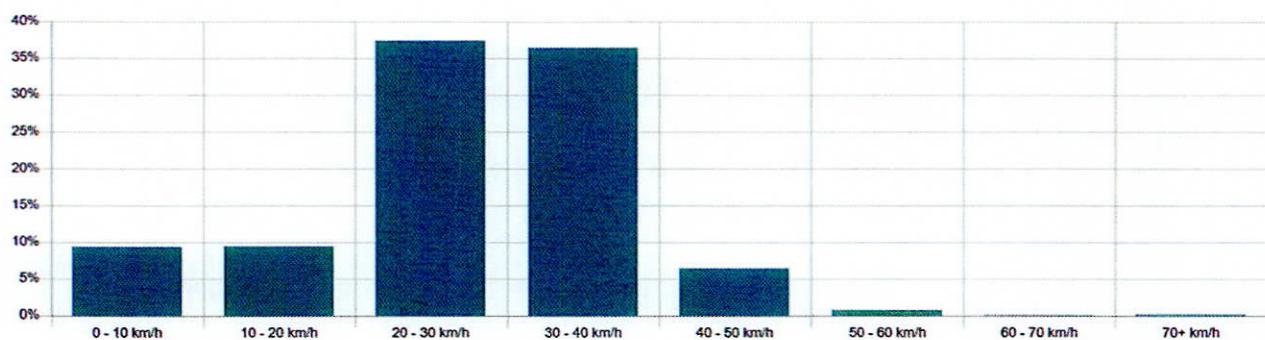
The district is included in Dublin City Council's 30km/h speed limit zone.

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.

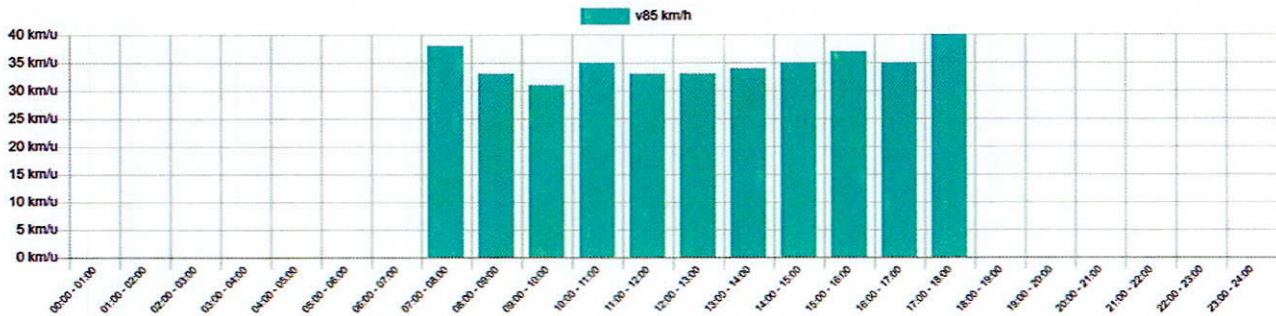
Iona district residents have gotten funding for a number of Telraam devices through WeCount project on ChangeX.com . Telraams (www.telraam.net) are "*..a combination of a Raspberry Pi computer, sensors, and a low resolution camera..*" that function as an automatic traffic counter. The Belgian Data Protection 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 report that 30%-40% of vehicles exceed the speed limit. The charts below show data for a Telraam device located on Iona Road.

Speed cars



Speed cars v85



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](#)

This speed limit is ignored by motorists daily. Data can suggest that more motorists observe speed limits at peak times, but observation suggests that this is because the volume of traffic impedes oncoming vehicles.

Road signage

The following signs are regularly ignored by motorists.

'Yield'

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

'Roundabout'

The roundabouts are in the "mini-roundabout format" but since they are sited in roads with an v85 in excess of 30km/h, they are less likely to be effective.

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

'No Left Turn'

Junction of Whitworth Road and Phibsborough Road.

This is less frequent observed, but when it occurs it means that vehicles are driving through a green pedestrian light. This pedestrian junction is on the Royal Canal path which 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.

National Transport Authority modelling may not accurately capture local detail

National Transport Authority modelling is providing data to support the BusConnects proposal. Output from the NTA forecasts is referred to in the proposal, though granular detail does not seem to be available. The NTA has released detailed forecasts from its Eastern Regional Model as part of the Metrolink proposal. This forecast seem to point to increased traffic on Whitworth Road, but not in Iona District. It is not clear how arterial roads surrounding Iona District could be busier, and residential streets within Iona District could see no change in traffic volume, when there is already substantial cut through traffic in Iona District.

This graphic appears in Vol 5 of Chapter 9 on page 58 (61 of 195).

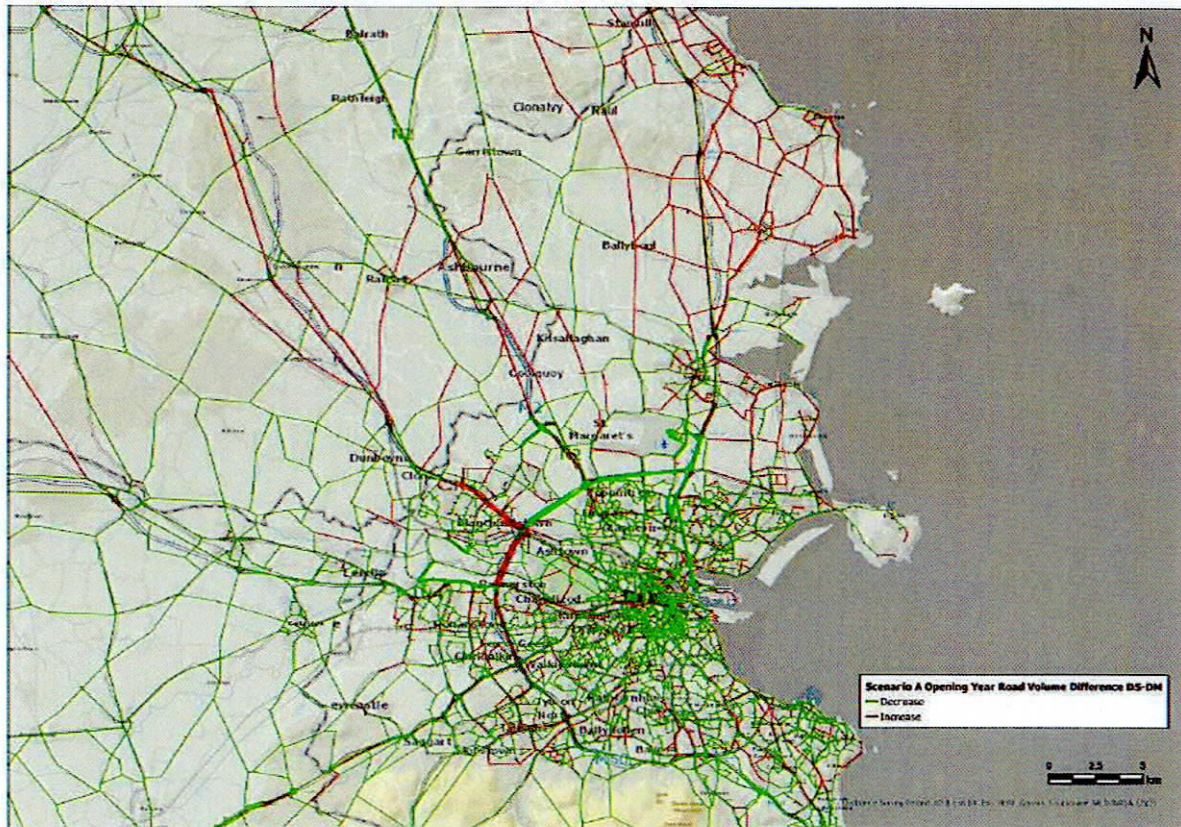
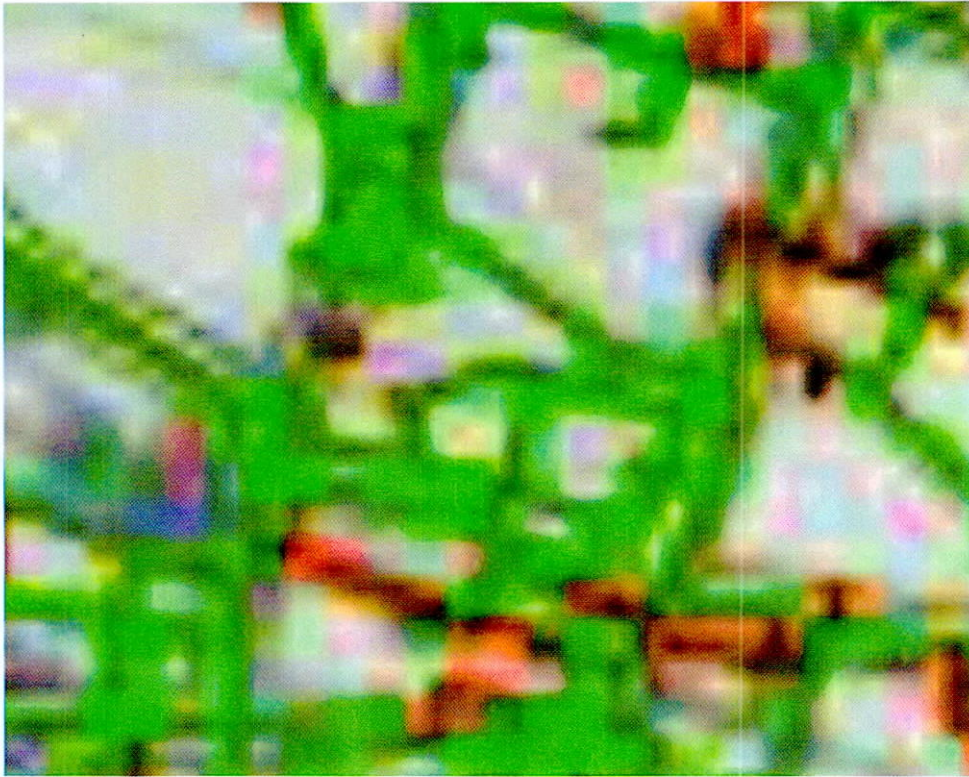


Figure 6.21: Highway Model – Flow Changes Scenario A 2035 AM Peak

Zooming in we lose quite a bit of resolution, but I believe the second screenshot is of Iona District, with Lindsay Road, Iona Road, Iona Park, Crawford Ave, and Hollybank Road identifiable. The data is identified as being output from the NTA's Model Development Report - Eastern Regional Model.

Overall graphic 1 supports the argument that most traffic flows will be better (green colour coding) post Metrolink completion, though the pixel detail in graphic 2 is perhaps ambiguous and could be interpreted as green (better) or red (worse).

Our reading is that Whitworth Road is red, i.e. worse. Given that traffic already cuts through Iona District to avoid Whitworth Road, how could the rat-run problem not be worsened?



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 BusConnects and Metrolink construction period(s) 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,
- The mini roundabouts on Iona Road and St Alphonsus Road need some adjustment.

- 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 BusConnects project and give whatever support may be required in implementing any solutions.