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Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart

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Dear

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observations on the call for submissions on the comprehensive Traffic Study of the Phoenix Park as part of the public consultation process with interested parties.

Our submission deals with

- ❑ Current and future projected commuting patterns, road safety issues and traffic management proposals.
- ❑ Potential for public transport and road safety improvements.
- ❑ Proposals for the long term management and monitoring of traffic in the Phoenix Park, in keeping with the objectives of the Phoenix Park Management Plan

As part of your evaluation we recommend that you request from Fingal County Council 2 detailed studies of traffic management in the Dublin 15 area:

- ❑ Blanchardstown Catchment Transportation Study dated February 2000 by Clifton Scannell Emerson.
- ❑ Blanchardstown Catchment Area Intergrated Development Framework dated November 2002 by SIAS.

1.0 Growth of Dublin 15 and impact on the Phoenix Park

Blanchardstown was earmarked from the early seventies as one of County Dublin's' three new towns. It has been anticipated for the past twenty years that this area would eventually accommodate a population of circa 100,000 persons.

In the past few years the Ireland has undergone a radical transformation. Our economy has achieved annual growth rates, which are the envy of our European partners. All indications are that for the immediate future, the economy will continue to grow at levels exceeding the EU norm. The greater Blanchardstown area is currently one of fastest growing regions in the EU and an important area in terms of satisfying the appetite of the 'Celtic Tiger'.

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

Those relevant to this study are;-

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

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

Early in the new millennium the target population for Blanchardstown will have been reached. 2002 census data is as follows

- The Dublin 15 area has grown rapidly from 53,221 in 1996 to 69,566 (census figures) an increase of 31%.
- Within Dublin 15 some areas have increased by 60%.
- The Castleknock area has grown from 15,875 ('96) to 19,373 ('02) an increase of 22.%.

Future expansion

- There was land zoned to build 13,732 new homes in Dublin 15 prior to the adoption of the current development plan. The 2005 – 2011 plan added additional residentially zoned lands at Barnhill to the west and Hollystown to the north east of Dublin 15.
- Fingal development board report (strategy 2002-2011) predict Dublin 15 population reaching 118,000 by 2011 based on current zoned lands
- CSO population trends: The report forecasts that the figure for Dublin will grow by 317,000 by 2021 (from 1.123 million) a 28% increase. It is expected that development pressure will continue in Fingal and in the Dublin 15 area.

We must also factor in the large numbers of non-Blanchardstown residents who travel into the area to work. The SIAS report contains a traffic study & predicts the following flow

External Trip rates (AM peak hr)

Year	In bound	Outbound	Total
2006	17656	14974	32630
2010	31926	22591	54517

Since the late seventies the Dublin 15 Community Council and others in the area have relentlessly campaigned for investment in both rail and bus services for the region. It is intuitively obvious that the area can not continue to grow without this growth accommodated by public transport.

In our opinion the following are some of the factors that have played a part in arriving at the current situation.

- ❑ Failure to provide a proper roads infrastructure ahead of development.
- ❑ Unwillingness to invest in public transport prior to developments coming on stream. It can be years later before either bus or rail serves residential areas e.g. Castaheaney, Diswellstown (West End) etc.,
- ❑ In early nineties too much emphasis placed on car / roads based solutions.
- ❑ Lack of unified approach to development and the provision of physical infrastructure in the greater Dublin Area. Various bodies have not consulted each other or properly co-ordinated their respective approaches.
- ❑ Lack of integration of public transport has deterred the public from using it (planning, operations, feeder buses to trains etc, timetables, integrated ticketing, fares structures)
- ❑ Public transport is perceived as unreliable, infrequent, overcrowded, time consuming and costly
- ❑ Haphazard approach to planning and development, Widely believed to have been developer led.
- ❑ Failure to require developers to undertake roads building at the outset of a commencement of a development, i.e. Allowed them to do it on a piecemeal basis thereby incurring long delays in building distributor roads etc.

Car usage

The levels of car ownership in Ireland have exploded in recent years (The increase in vehicle numbers from 1.02m in 1989 to 1.6m in 1999 (including 1.27m cars) gives some indication of the increase in traffic). The growth in car ownership will continue to climb until European levels of car ownership are reached.

Fingal County residential areas are outer suburban locations, which are not easily accessible by public transport, neither are the vast majority of our facilities or services within easy walking distance. In these circumstances it is a fact that residents in Outer Suburbia rely more heavily on cars for mobility than do inner city residents.

Public transport alone cannot, nor will not meet these mobility aspirations, a motor vehicle is an essential form of transport in an outer suburban location and it's presence in areas such as Dublin 15 will continue to grow.

Access to Public Transport

For decades we have experienced serious deficiencies in the provision of public transport in relation to newly emerging residential areas in Dublin 15.

The scenario is outlined thus;

- ❑ New house built.
- ❑ Main Distributor/Access Roads only laid to entrance of the new phase to accommodate building of most recent phase of development.
- ❑ Houses occupied.
- ❑ No public transport (mainly Buses) available within reasonable distance.
- ❑ Dublin Bus won't provide service due to incomplete road network/and claim insufficient demand from new house occupants.
- ❑ New residents have to rely on private car and then establish commuting pattern, which is car based.
- ❑ Generally, years later Dublin Bus provide service once the entire area is built upon, however, commuting pattern now well established and therefore difficult to break.
- ❑ The element of choice has been removed/was never really available for the new residents.

We must provide the choice between public/private transport as soon as a newly built area is in occupation. We must use incentives instead of the do nothing/stick approach, which has been the strategy to date.

Public Transport - To be effective must be

REGULAR, RELIABLE, ACCESSIBLE, AFFORDABLE AND FLEXIBLE

High Quality Public Transport is the key to success in sustaining increased densities in suburban areas.

There is no doubt that a holistic, integrated and targeted approach is required to effectively deal with the communication issues posed by the extent of the existing and planned development in Dublin 15. Any solution must include a comprehensive mass transit system to enable the public travel to /from this area daily. Any strategy developed must recognise that we will not in the medium term achieve any significant inroad into attaining a situation where in fact the majority of persons live/work in Dublin 15. Today quite the opposite is true.

- ❑ The vast majority leaves the area to go to their place of employment.
- ❑ The vast majority of those who work in Dublin 15 do not live here.

The DTO stated aspiration of the vast majority of commuters using mass transit systems to go to /from work etc in the foreseeable future will take years to achieve. In the short term we need to make Bus a more attractive commuting option for the morning and evening peak commuters.

2.0 Constraints on the Dublin Bus routes serving Dublin 15

Since the late seventies the Dublin 15 Community Council and others in the area have relentlessly campaigned for investment in both rail and bus services for the region. It is intuitively obvious that the area can not continue to grow without this growth accommodated by public transport.

A recent survey of QBC's in Dublin noted that the Blanchardstown QBC was:

- ❑ Journey times on Buses to travel across the city (under 10miles) now take 2hours from terminus to city centre.
- ❑ Commuting time by car is quicker than using the QBC.

There are 2 reasons for this;

Bus is the current and future mass transit system that has the potential to make a real impact on our road gridlock situation.

- ❑ It can be bought relatively cheaply and quickly brought into service.

Existing routes are

- ❑ No 37 serving Carpenterstown and Castleknock.
- ❑ No 38 serving north Blanchardstown, Mulhuddart, and Corduff.
- ❑ No 39 (QBC) serving Castaheany, Clonsilla, Hartstown, Blanchardstown Village
The bus route through Dublin 15 is on single carriage way roads competing with private transport (no separated bus route).
- ❑ All the above routes from Navan Road through Stonybatter are on single carriage way roads competing with private transport (no separated bus route) as traffic from North West Dublin converge on the city centre.

Suggestions

- ❑ Provide additional bus routes as outlined in the SIAS report.
- ❑ Change 50% of the morning and evening peak buses for the Number 37, 38 and 39 routes to Expresso routes that pick up passengers in Dublin 15 only, and then enter the Phoenix Park via the Ashtown Gate.
- ❑ Provide a bus only route along the existing "North Road" that runs north of Aras an Uachtarain and the Zoo.
- ❑ Merge the bus route with Chesterfield Road at the people's garden with a bus lane either side of the road.
- ❑ North Road can revert to amenity access route for people to access the Phoenix Park outside Monday – Friday peak commute times.

The environmental impact of a bus full of peak time commuters is less than the impact of each commuter driving their private car through the park.

3.0 Traffic flows through the Phoenix Park.

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

These are;

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

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

- ❑ The M50, joining at N3 junction or
- ❑ Use Chapelizod via Ballyfermot or
- ❑ Continue down to the Chapelizod Road and go via Kilmainham.
- ❑ Some traffic will also use the Furry Glen Rd in the Phoenix Park as an alternative to the above commuting route.

No new roads can be built on a west/east axis to cater for the thousands of new commuters that will go to live in the residentially zoned areas in the years ahead. Indeed, even if new roads could be built they would still approach bottlenecks at the Quays and Phibsboro. Motorists and buses will have to cope with the existing road network for journeys into the city centre. Even the loss of use of a minor road can have dramatic effects on journey times, e.g. closure of Martins Row, Chapelizod during the recent floods of early November or the earlier resurfacing works there.

The proposal by Dublin City Council to close or restrict Martins Row, Chapelizod has a major impact to the Phoenix Park as it will divert traffic through the park that would otherwise use Chapelizod.

Suggestions

- ❑ Ensure Dublin City Council do not close or restrict Martins Row, Chapelizod.
- ❑ Consider opening White's Gate for one way traffic flow at peak times, (i.e. east bound in the mornings and west bound at evenings).

4.0 Road safety improvements

Where possible, cyclists should be separated from traffic. While this exists on Chesterfield Ave, consider extending this to all roads within the park.

Speed Kills. Existing speed limit of 30MPH should be enforced, consider the use of fixed camera.

- ❑ U.K. studies have shown that pedestrians will have a 20% fatality rate in a collision with a car at 30MPH.
- ❑ At 40MPH that rate raises to 85% .For children that rate is higher.

5.0 Summary

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

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

These choices must focus on the positives and be so designed as to offer real incentives to persons opting to choose public transport. Currently we now discourage car journeys to the city centre by rapidly increasing car parking charges, and strictly enforcing penalties for parking offences.

Yet in Dublin 15 we have seen little improvement in our rail / bus frequency of service.

We cannot force people out of their cars and at the same time fail to provide value and quality public transport to all sections of the community, before the stick is applied.

Retaining choice with regard to transport / roads issues is a sensible and proactive approach which will help to ensure that we can sustain the level of development that Dublin 15 will continue to experience.

The environmental impact of a bus full of peak time commuters is less than the impact of each commuter driving their private car through the park.

In doing so we must adopt strategies which afford people choice.

We are available to discuss further any of the issues raised in our submission.

Yours sincerely,

Kieran O'Neill

Kieran O'Neill
Chairperson
Dublin 15 Community Council