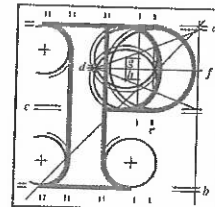


**Our Case Number:** ABP-313182-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

**Date:** 15 June 2022

**Re:** BusConnects Clongriffin to City Centre Core Bus Corridor Scheme  
County Dublin

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above 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 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 Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

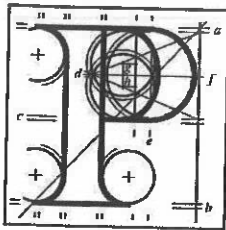
Yours faithfully,

Kevin McGettigan  
Administrative Assistant  
Direct Line: 01-8737263

BL50A

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
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<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



**An  
Bord  
Pleanála**

## SID Online Observation

Online Reference: (SID-OBS-000087)

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### Online Observation Details

<b>Contact Name:</b>	Feljin Jose
<b>Lodgement Date:</b>	02/06/2022 16:54:36
<b>Case Number / Description:</b>	313182

### Payment Details

<b>Payment Method:</b>	Online Payment
<b>Cardholder Name:</b>	Feljin Jose
<b>Payment Amount:</b>	€50.00



Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

ABP case ref: 313182

## **BUSCONNECTS CORE BUS CORRIDORS CLONGRIFFIN SCHEME**

### **Introduction**

Dublin Commuter Coalition was established in 2018 as a voluntary advocacy group for public transport users, cyclists, and pedestrians in Dublin and surrounding counties. The Coalition acts as a unifying voice for commuters in these areas so that they may express their concerns, their hopes, and their vision of a Dublin that works for all users of sustainable transport.

We support the BusConnects Core Bus Corridors project and we are glad to see over three years of engagement finally result in a planning application. We believe this project will be a catalyst for greater usage of public transport and active travel along the Malahide Road area. We welcome measures such as the increased bus priority, safer cycling infrastructure, removal of slip lanes, improved permeability between Ayrfield Drive and Malahide Road and the filtered permeability at Haverty Road. However, we would like to see some improvements to the project.

### **Road widths**

The NTA has not provided a justification for the over-provision of road space for vehicular traffic north of Priorswood Road in this scheme. Here, the carriageway widens from four lanes (two general traffic lanes and two bus lanes) to six lanes with the inclusion of an additional general traffic lane in each direction. At junctions, this widens to a staggering eight lanes.

This is most evident at the Malahide Road junction with Clarehall Shopping Centre where a simple T-junction serving as an entrance to both a commercial and residential area is widened to eight lanes. Such large roads will discourage active travel and result in undesirable levels of driving and is at odds with the aims of the project. Furthermore, the NTA proposes acquiring land to build this excessively wide road when a more suitable and less car-dominant design could be built within the existing boundary.

## Enforcement

There are bus and cycle lanes, bus priority lights and turn bans for vehicular traffic except buses proposed in this scheme. The success of these measures rely entirely on the legal usage of roads by drivers. Existing bus lanes, bus priority lights, bus gates and turn bans are abused every day in Dublin due to the near-zero level of enforcement. However, there is no provision for enforcement cameras proposed as part of this project. Without a plan for camera enforcement, the effects of the improvements proposed in this scheme will not be seen by bus users.

## Junction design

The primary junction design proposed by the National Transport Authority, the 'Dublin-style' junction (Figure 1), was designed by the NTA and does not follow international best practice in junction design.

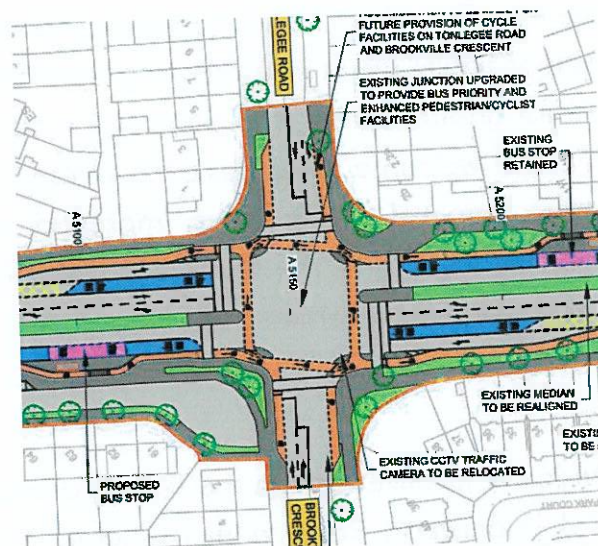


Figure 1 NTA's 'Dublin-style' junction at Tonleeg Road

When compared to the proven Dutch junction, the NTA's design poses a great risk of left-turning drivers crashing into cyclists and has larger crossing distances for

pedestrians. The few existing examples of this NTA design in Dublin has been widely regarded as unsafe. We request that the NTA use Dutch-style junctions (Figure 2) or CYCLOPS junctions (Figure 3) throughout the project.



Figure 2 Dutch-style junction at Swords Road/Griffith Avenue from the second public consultation

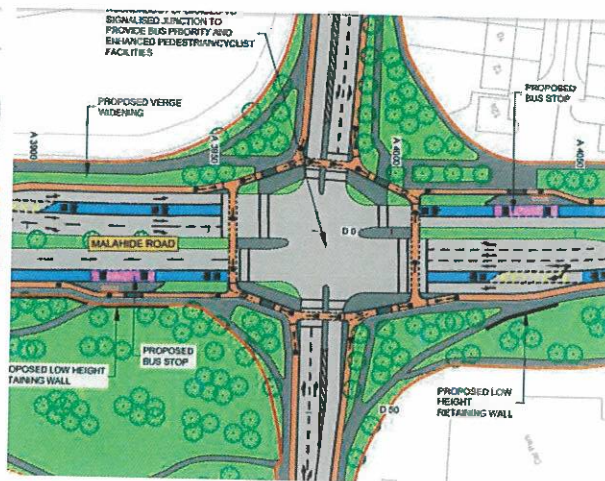


Figure 3 CYCLOPS junction at Priorswood Road

## Pedestrian crossings

There are dozens of examples of two-stage pedestrian crossings proposed as part of this scheme. These crossings drastically increase the time required for pedestrians to navigate junctions and crossings and are inconsistent with the requirement to consider pedestrians first when designing urban roads.

Two-stage crossings can be found on the Malahide Road at junctions with Clarehall Avenue, Priorswood Road, Greencastle Road, Tonleegge Road, St. Brendan's Drive, Ardlea Road and Griffith Avenue as well at the pedestrian crossing near Belcamp Lane.

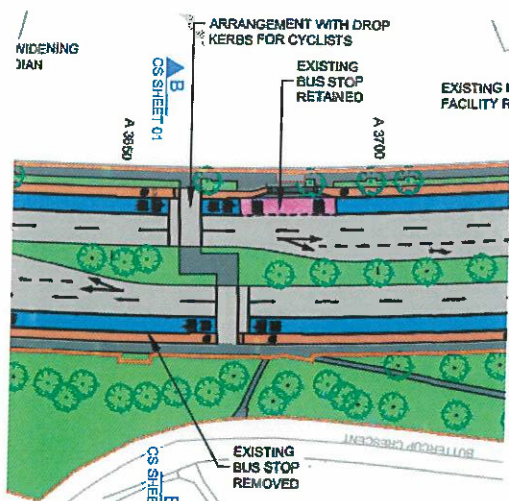


Figure 4 Proposed two-stage pedestrian crossing near Belcamp Lane



Furthermore, some junctions are missing necessary pedestrian crossings at one or more arm such as at the Malahide Road/Clarehall Shopping Centre junction and the Malahide Road/Griffith Avenue junction.