

Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

**Date:** 18 July 2022

**Re:** BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme  
Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your 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 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,

Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

BL50A

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ABP case ref: 313509

## **BUSCONNECTS CORE BUS CORRIDORS BELFIELD/BLACKROCK 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.

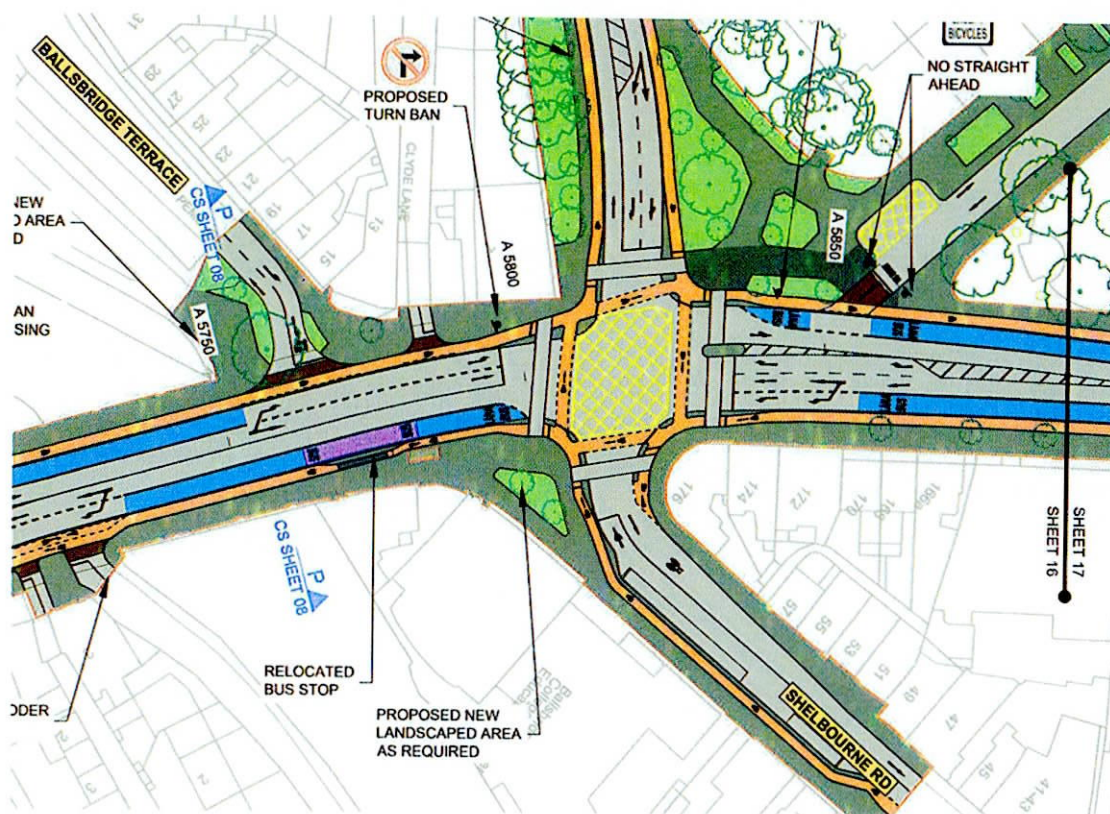
We support the BusConnects Core Bus Corridors project and we are glad to see over three years of engagement finally result in a planning application. We believe this project will be a catalyst for greater usage of public transport and active travel along the route.

### **Enforcement**

There are bus and cycle lanes, bus gates, bus priority lights and turn bans for vehicular traffic except buses proposed in this scheme. The success of these measures relies 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.



Of particular concern is the removal of right turn for vehicular traffic onto Shelbourne Road (Sheet 16). This is a well-used junction for vehicular traffic heading west towards the Aviva stadium or onwards towards the East Link Toll bridge and IFSC district.



It is our concern that removal of this right turn will result in a large number of illegal turns to avoid the oncoming no-through road / bus gate at Baggot Street. Our expectation is that vehicles will pass through the junction and perform a U turn manoeuvre at the junction of Pembroke Road, potentially invading bus lanes & pedestrian infrastructure. There is enough room at this junction by reducing the size of the new landscaped area to retain a right filter light which would prevent this illegal behaviour and improve overall safety on the road. Alternatively, Gardai or traffic camera enforcement will be required to ensure the safety of road 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.

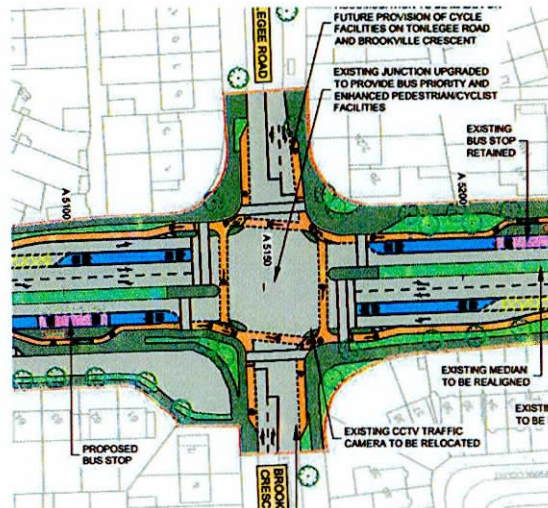


Figure 1 NTA's 'Dublin-style' junction at Tonleeg Road

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.

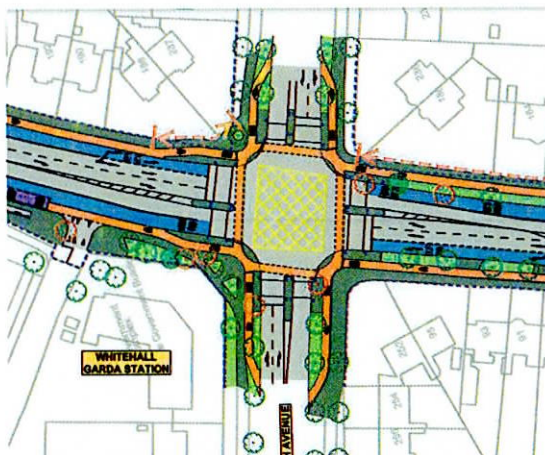


Figure 2 Dutch-style junction at Swords Road/Griffith Avenue from the second public consultation

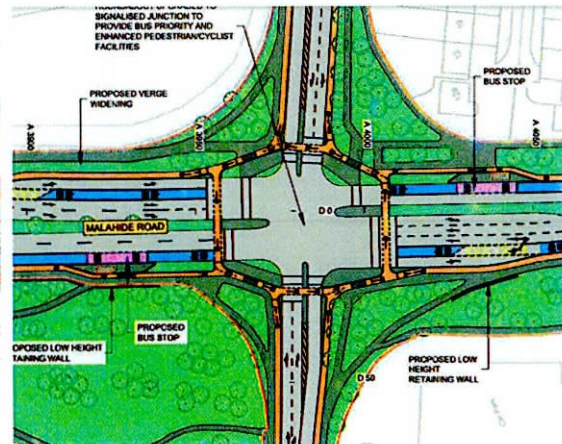


Figure 3 CYCLOPS junction at Priorswood Road

Additionally, there are several junctions (Newtown Avenue, Rock Hill, Lansdowne Road etc.) that do not align with the general direction of DMURS to minimise the radii of corners for pedestrian safety. We would ask that the applicant be asked to reduce these corner radii.



## **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.

Furthermore, many four-way junctions are missing pedestrian crossings entirely on one or more legs. These missing crossings mean a pedestrian may need to wait for three lights — or more in the case of two-stage crossings — just to cross the street and continue their journey.

The following junctions have one or both issues:

Junction	Issue
Temple Hill/Monkstown Rd	Two-stage crossing
Temple Rd/Newtown Ave	Two-stage crossing, missing crossings (2)
Frascati Rd/Temple Rd	Two-stage crossing, missing crossing
Frascati Rd/George's Ave	Two-stage crossing
Rock Rd/Boooterstown Ave	Missing crossing
Strand Road	Missing crossing
Fitzwilliam St. Lwr/Mount St. Upper	Missing crossing
Nutley Lane/Stillorgan Rd	Two-stage crossing, missing crossings (2)

We also request that a pedestrian crossing be installed on Fitzwilliam Street at Fitzwilliam Lane.

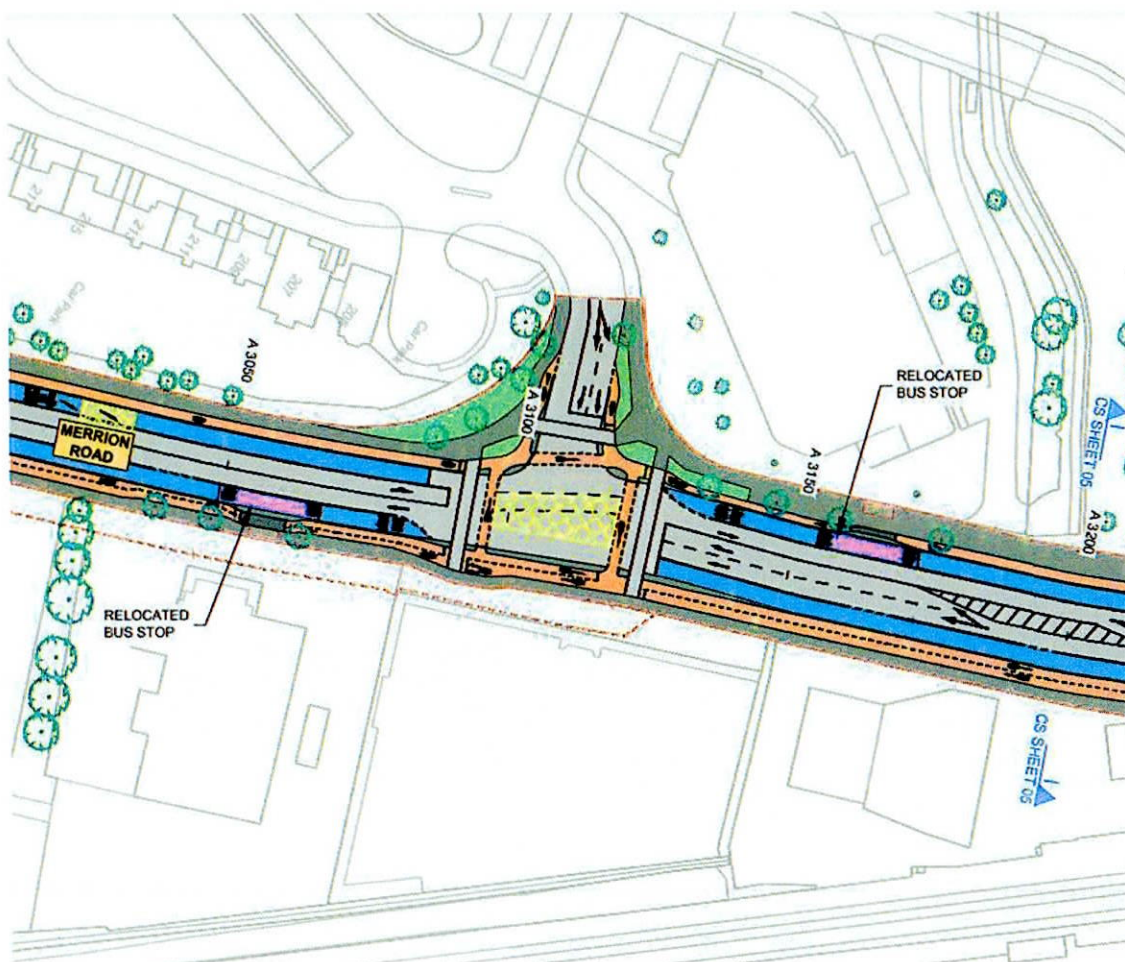
## **Shared space**

The project proposes having shared space for pedestrians and cyclists at several junctions (Boooterstown Station, Nutley Lane, Elgin Road etc.). This arrangement is entirely unsuitable for busy urban junctions. We insist that pedestrians and cyclists be segregated at all junctions for the safety and comfort of everyone.

## **Bus stop design**

A major concern throughout the plans is the width of the bus stop islands that are proposed. Bus stop islands are crucial for the safety of cyclists and for encouraging all

ages and abilities to use cycling infrastructure. However, such narrow islands place cyclists in direct conflict with boarding and alighting bus passengers. We ask that all bus stops include adequately wide islands to avoid unnecessary conflict points between passengers and cyclists.



## Bus stop location

### Temple Hill

The junction at Temple Hill is intended to be an important interchange between the B Spine and the S8 Southern Orbital Route, which will run from Dún Laoghaire to Sandyford, then on to Tallaght and Citywest. This interchange will allow people travelling from areas along the B Spine and Radial Route 98 to connect onto the S8 Southern Orbital Route to get to the major employment areas of Sandyford and Citywest.



The proposed stops on Temple Hill are located on the outward sides of the north and south arms of the junction with Monkstown Road and will serve routes B3, B4 & 98 in the northbound direction and routes B4 & S8 in the southbound direction. However, routes B3, S8 & 98 are not served in the eastbound direction, which means that interchange cannot be made between all routes in all directions.

We believe that the most appropriate solution is for an additional bus stop to be placed on the outward side of the eastern arm of this junction, on Monkstown Road. A stop on the eastern arm would serve routes B3, S8 & 98 in the eastbound direction, and would allow for a full interchange between routes B3, B4 & 98 and the S8 Southern Orbital Route.



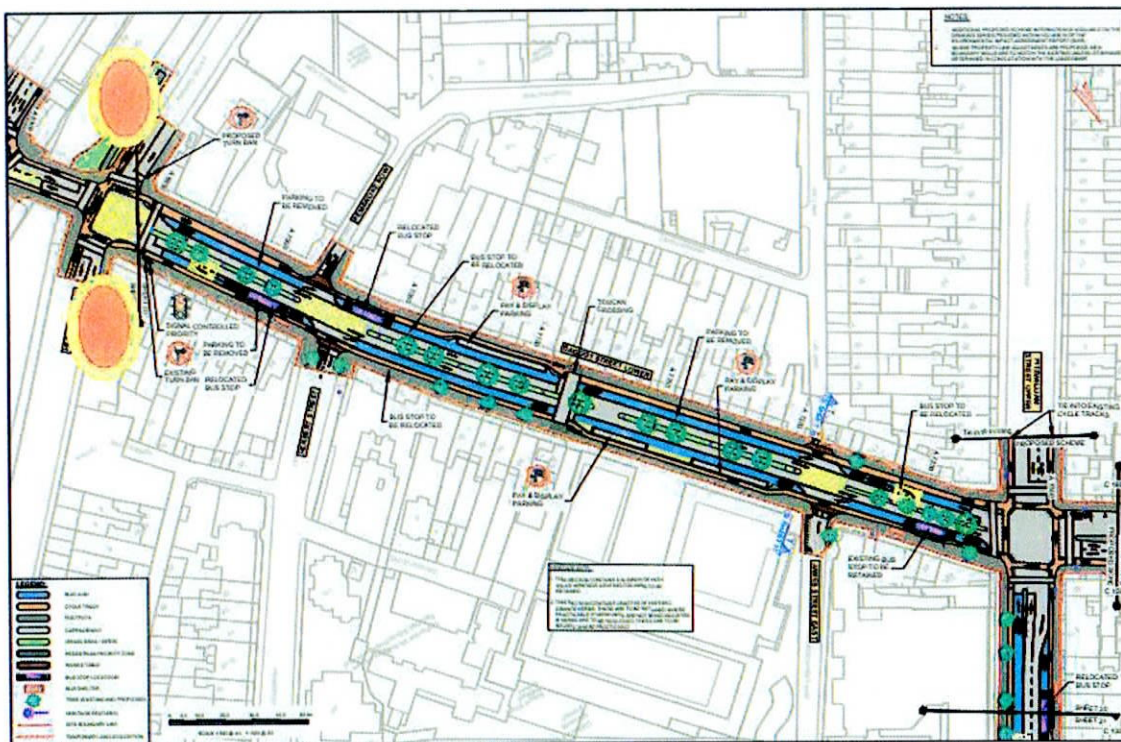
*Temple Hill Requested Option - Additional stop on the outward side of the eastern arm*

We request that the board modifies the scheme to require an additional bus stop on the outward side of the eastern arm of this junction, to allow for easy interchange between all routes and directions. We also note that such an additional stop would be partly within the scheme boundaries and would necessitate minor changes to other aspects of this scheme, and therefore should be provided as part of this scheme rather than left to another scheme.

## Baggot Street Lower

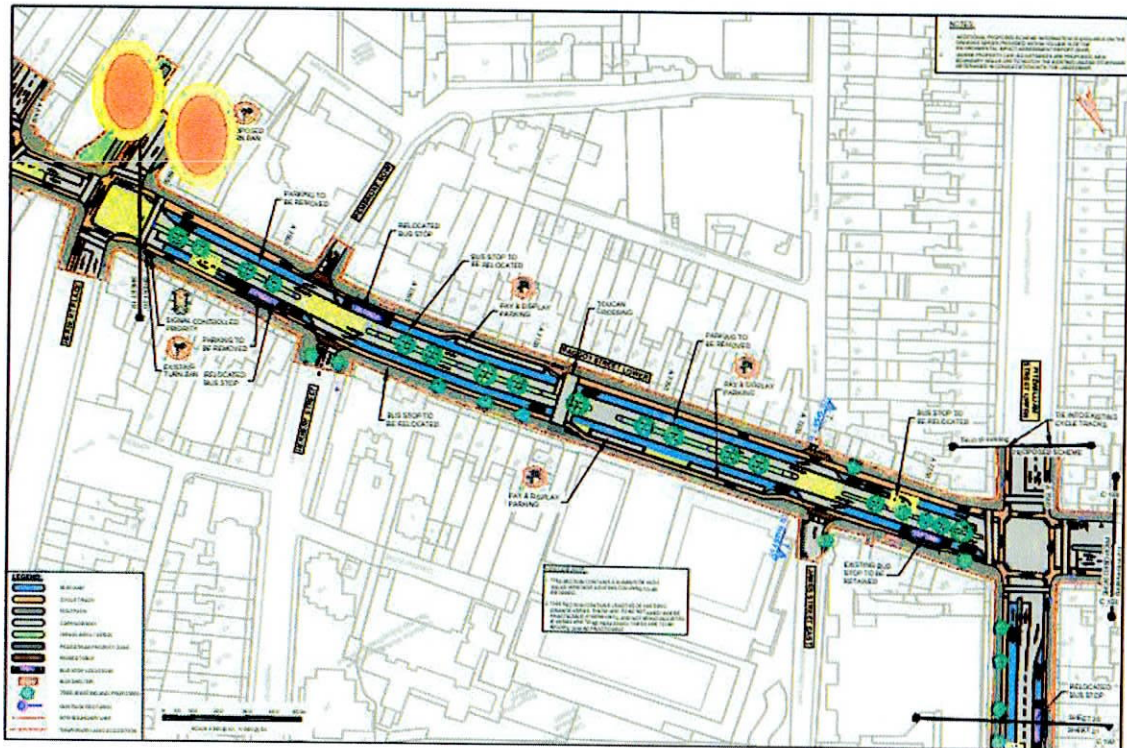
The junction of Baggot Street Lower and Wilton Terrace/Herbert Place will form an important interchange between the B Spine and the O Inner Orbital Route. The proposed stops on Baggot Street Lower are located around 75 metres to the north of the junction and will serve the B Spine and Radial Routes 34, 35 & 37 in both directions. We are happy with the proposed stop placement, and we request that the board makes no significant modifications to these stops.

However, on Wilton Terrace/Herbert Place, it is unclear where the nearest stops which could serve the O Inner Orbital Route will be located. It is important that stops for the O Inner Orbital Route are located close to the junction to facilitate easy and legible interchange between the B Spine and the O Inner Orbital Route. Options for this could involve placing stops on the outward sides of the Wilton Terrace and Herbert Place arms of the junction, or placing a stop pair on either the Wilton Terrace or Herbert Place arms of the junction.

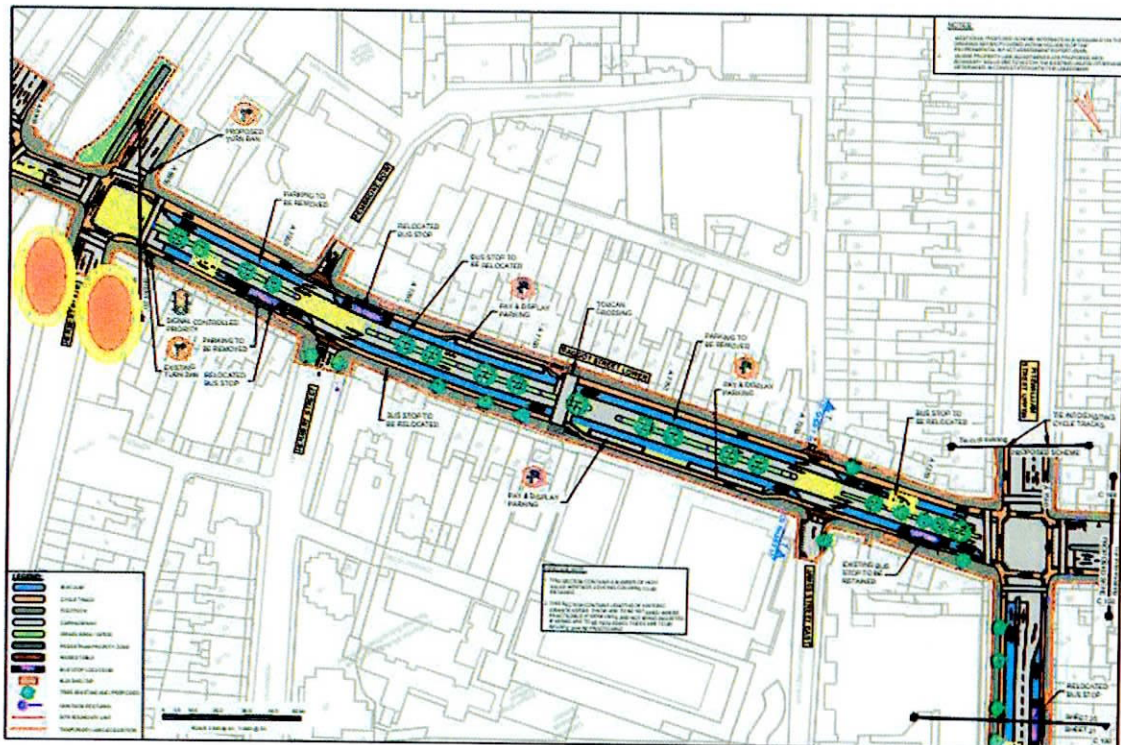


*Baggot Street Lower Requested Option 1 - Additional stops on the outward sides of the Wilton Terrace and Herbert Place arms of the junction*





*Baggot Street Lower Requested Option 2 - Additional stop pair on the Wilton Terrace arm of the junction*



*Baggot Street Lower Requested Option 3 - Additional stop pair on the Herbert Place arm of the junction*

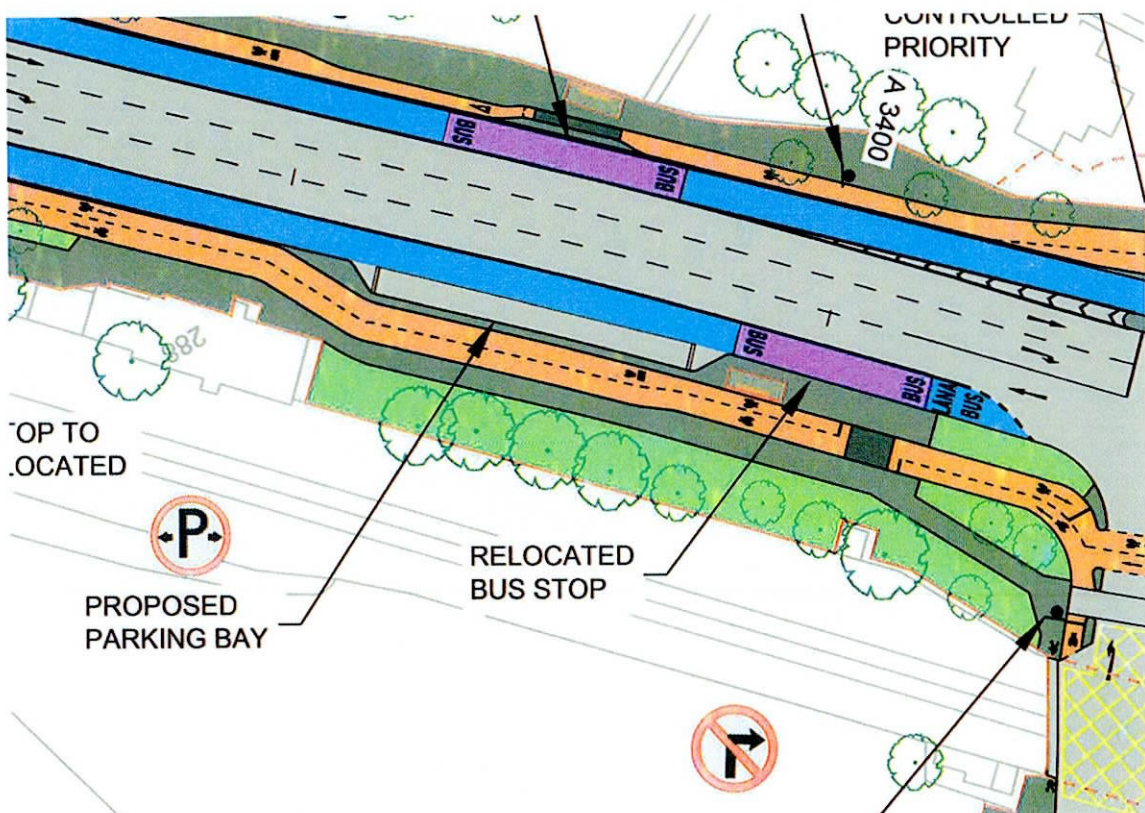
We request that the board modifies the scheme to require additional bus stops on Wilton Terrace and/or Herbert Place, to allow for easy interchange between the B



Spine and the O Inner Orbital Route. As these new stops would be partly within the scheme boundaries and would necessitate changes to other aspects of this scheme, such as the routing of cycle lanes around the bus stops, they should be provided as part of this scheme rather than left to another scheme.

## Parking spaces

There are some parking spaces being added within this proposal that seem superfluous and, in some cases, dangerous, that we would like you to reconsider. Whilst we welcome the redesign & removal of the filter lane at Merrion Gates, a number of parking bays have been added which we think are unnecessary.



There is no current provision for parking at this location and there does not seem to be a demand either. There are no retail or residential buildings that they will serve and, northbound drivers would be encouraged to perform a dangerous U-Turn to use the parking bays.

It would be our recommendation to remove these parking bays from the plans and extend the cycle tracks 'straight-run' before it is adjusted behind the bus stop. This will allow for greater pedestrian space coming from or going to Strand Road.

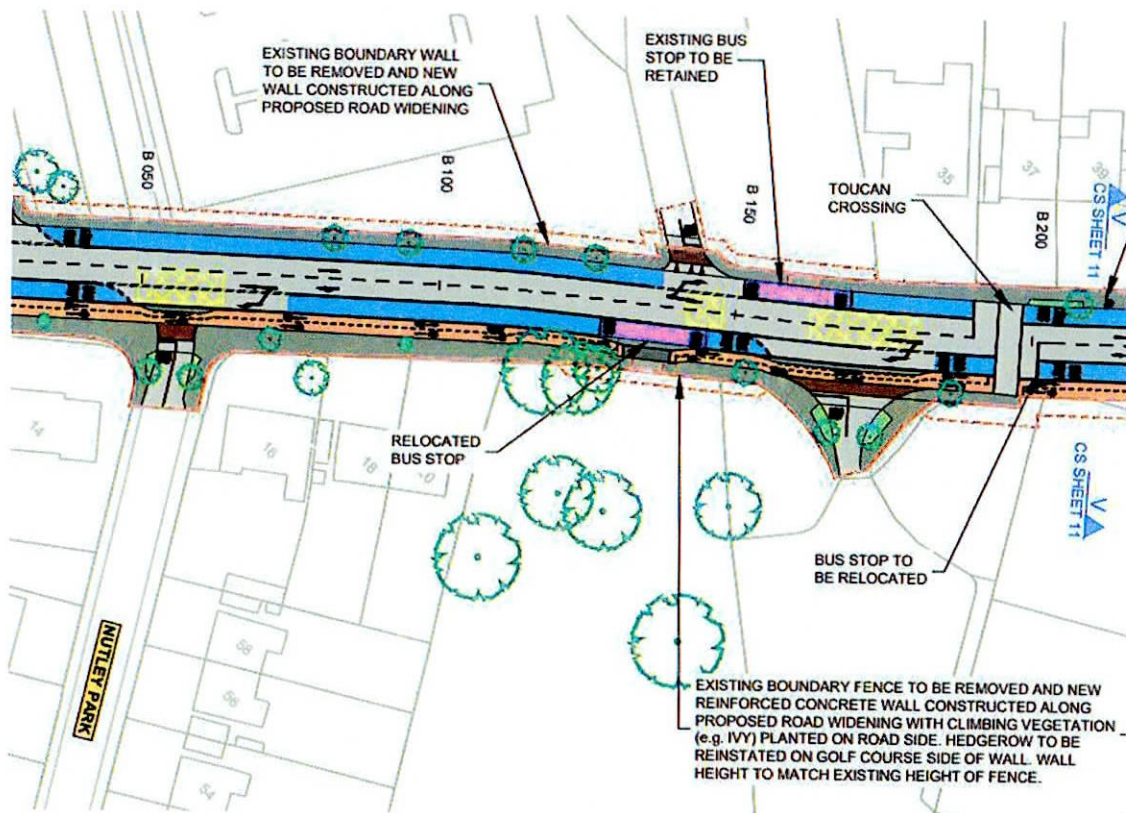


## Nutley Lane

The proposed design for Nutley Lane is inadequate for pedestrians. The removal of the footpath to facilitate two-way general traffic is a regressive step and one that should be avoided at all costs. We would propose making Nutley Lane one way for general traffic to implement cycle lanes, bus lanes and footpaths on both side of the road.

## Treatment at minor junctions

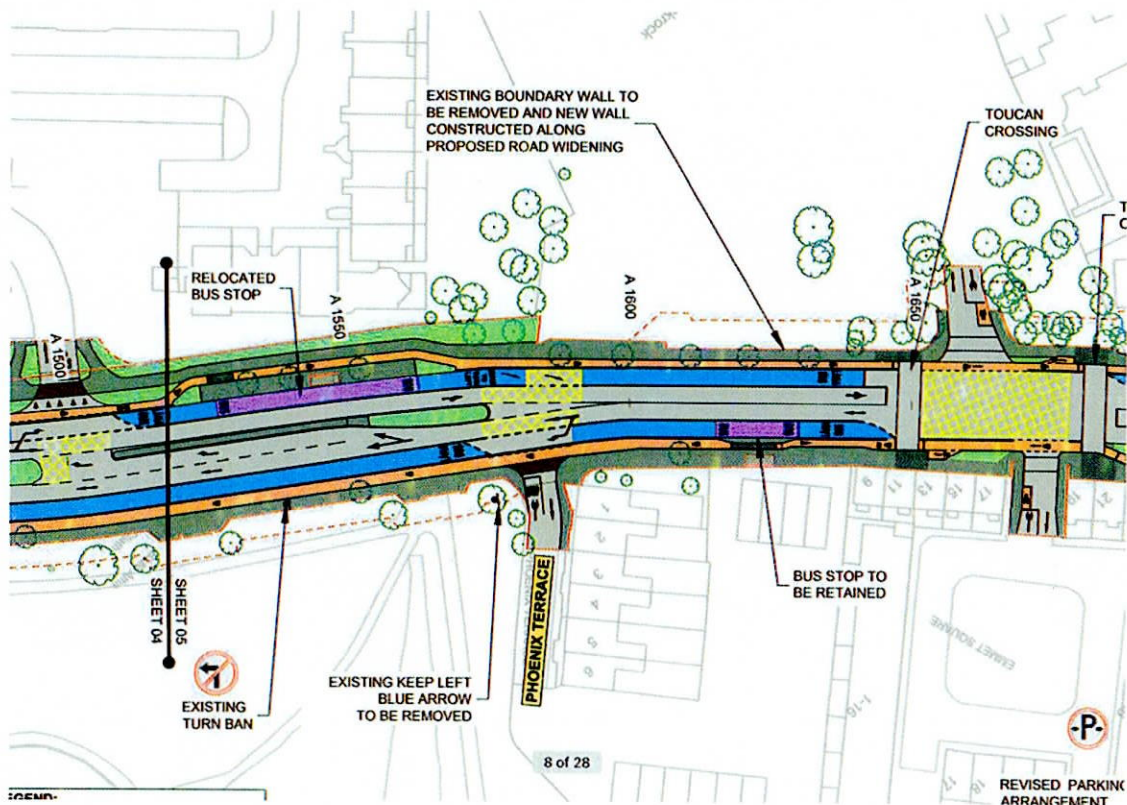
The interaction between cycle lanes and minor roads is often bizarre. While the raised crossing is very welcome, it's not clear why the cycle track is being narrowed to a very uncomfortable width instead of both the crossing and the cycle track curving inwards slightly.



## Yellow boxes

There are a number of examples on the map where we believe the yellow boxes should be extended to avoid vehicles being stranded in dangerous areas and impeding active travel users.

Two examples of this are on Strand Road at Merrion Gates where a traffic signal is to be placed earlier at the junction than the existing location and the Rock Road at Phoenix Terrace.



It would be our recommendation to extend these yellow boxes so they cover the entirety of the road area up to the signal point. It is very easy to see that cars will continue to queue up right at the level crossing gate at strand road, breaking the red light and blocking access to the beach area.