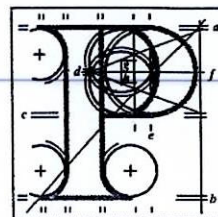


Our Case Number: ABP-313509-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Dr. Mike McKillen
'The Mews'
3, Seaview Terrace
Ballsbridge
Dublin 4

Date: 18 July 2022

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

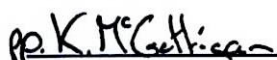
Dear Sir,

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 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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An Board Pleanála,
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Dublin 1.

'The Mews',
3, Seaview Terrace,
Ballsbridge,
Dublin 4.

11 July 2022

Application by NTA Under SID for Bus Connects Blackrock/Belfield Core Bus Corridor
Case Ref: HA29N.313509

Applicant Name: Dr. Mike McKillen

Contacts: [REDACTED]

Interest in Scheme:

Lifetime commuting bike user, local resident, founding Chair of Cyclist.ie, former Chair of Dublin Cycling Campaign & recent Chair of TCD Active Travel committee.

1. Introduction

I have been an everyday bike user from my residence here to work in TCD for the past 53 years (I still hold an adjunct professorial position at TCD).

I have seen the dramatic changes in traffic and traffic management over that time.

Congestion caused by too many private vehicles has really come to the fore in the past decade with the concomitant rapid rise in car ownership, but with carriageway widths fixed from a time past. Bike users have been squeezed out particularly with the rise in SUV ownership (c. 50% of new cars in 2021 were SUV body-type). SUVs occupy far more road space than saloon body-types. They are wider (typically 2,200mm across wing-mirrors). With the advent of van-type taxis able to carry mobility-aids this width factor impacts on bike users in bus lanes..

The bus lanes are no longer safe or pleasant places for bike users, particularly with the advent of Aercoach services that don't have regular stops like Dublinbus services do (this means Aircoach drivers tend to drive faster in bus lanes, as do taxi drivers).

There are several schools in this locality. The biggest being St. Michael's College located on Ailesbury Road and Nutley Avenue (a cul-de-sac). Very few students cycle to this school, simply because parents have decided that it isn't safe! Most are driven to school in the morning commuting rush-hour. The parking and vehicle turning mayhem that this produces at school start/end times must be seen to be believed. Most parents don't drive into the college grounds, but instead drop-off on-street and then head up the Avenue to turn their

car in private entrances. This is not acceptable for active travel promotion around a school. Bus Connects on Nutley Lane (Belfield corridor) will fail if it doesn't address this issue.

2. Scope of Submission

My submission deals solely with Nutley Lane axis (and local built environment) of the two subject routes. It serves to illustrate what is amiss with this once-in-a-lifetime chance to drive modal-shift to bike use.

Cyclist.ie/Dublin Cycling Campaign will make a more detailed submission. I concur with its content.

3. The Nutley Lane Corridor and Junctions

The existing cycling conditions along the project corridors are poor. On Merion Road (R118) cyclists are expected to share the lane with buses, taxis and other vehicles (Aercoach). The junctions are unsafe and there is little cycle infrastructure. These sections are only suitable for 'Strong and Fearless' cyclists. The rest of it is hostile, having few of the design elements needed to attract people in the large 'Interested but Concerned' cohort.

The Stillorgan Road (R138) although it has an off-road cycle path is of poor quality (with rutted red-surface treatment), gulley traps right in the riding path, illegally parked vehicles, etc marring its utility and with poor integration at junctions. For instance, no bike-boxes with ASL are marked on any arm at the complex Donnybrook church junction.

The new design for Nutley Lane fails to provide a level-of-service that commuting bike users to and from UCD Belfield and the Cranford Shopping Centre require for a direct and coherent route. At present I can make seamless passage by bike from the Merrion Road or my home on Nutley Road to the Cranford Centre and UCD Belfield.

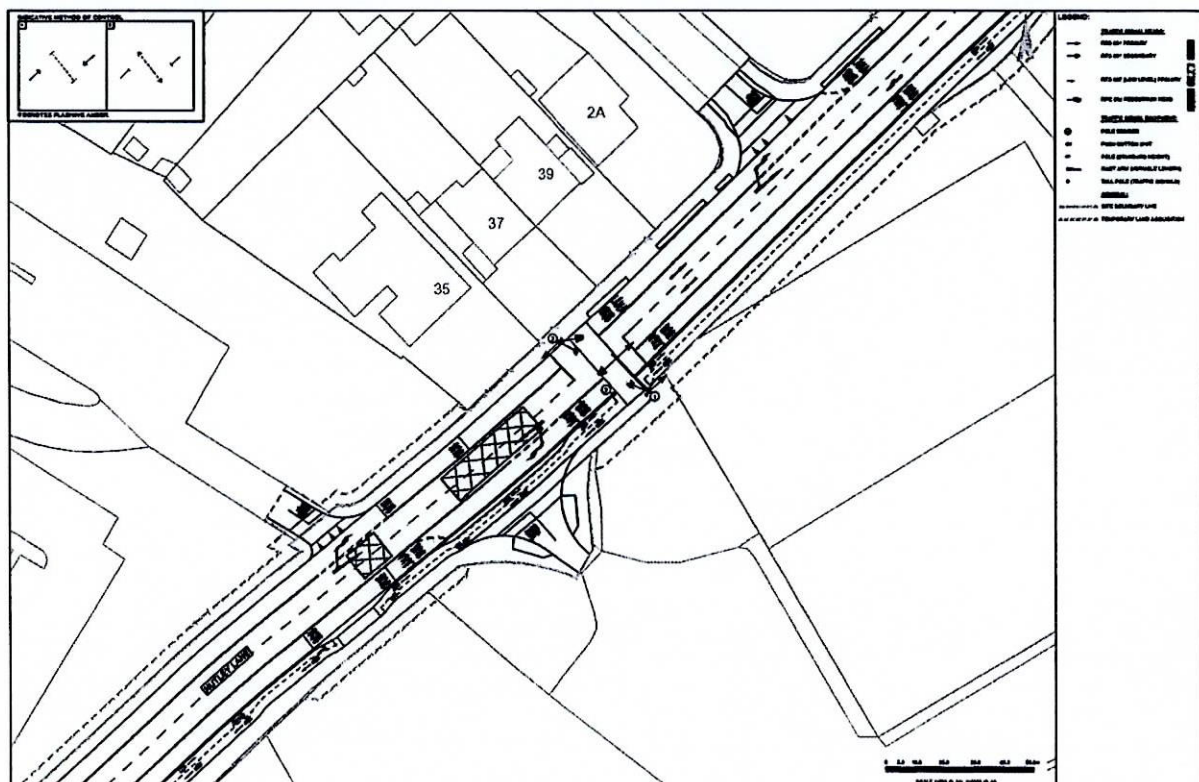
Let's take a trip back from the Belfield Bike Shop at Cranford Centre to my home on Nutley Road for illustrative purposes.

I leave Cranford Centre by bike and head to Nutley Park (permeability filtered) to its junction with Nutley Lane. I turn R onto Nutley Lane and then L-turn into Nutley Road and then home. The L-turn into Nutley Road off Nutley Lane has a prohibited period for all vehicles (cycles included because there is no 'Except Cycles' plate) between 07-10h00 Mon-Sat, inclusive). It is not policed by Garda and so hundreds of drivers in that morning period avoid the congestion at Donnybrook by this illegal turn and to access Stand Road from Ailesbury Road. This prohibited L-turn is maintained in the new proposal, but the applicant says nothing about it being almost totally ignored by drivers and unenforced by Gardai.

To make the same trip under the new design, I turn R out of Nutley Park onto a 2-way cycle path on the Elm Park side of Nutley Lane and then just a few metres north of Elm Park

entrance I have to press a beg-button to activate a Toucan-crossing to cross over to reach the Nutley Road junction via a short section of inbound bus lane with the prohibited L-turn with no 'except cycles' exemption.

This is not a coherent or direct return trip from Belfield Bike Shop.



Nutley Lane with Elm Park GC & Nutley Road junctions

Consideration must be given to a redesign of this overly complicated Nutley Lane proposed layout. A conventional one-way cycle track (2m) either side of the full length of Nutley Lane. This route is a main accessway to UCD so a 3.0 m two-way track as proposed is inadequate. Stopping the eastbound two-way bike lane entirely at the entrance to Vincent's Hospital provides far too low a quality of service for this very busy route. An Bord should request that the applicant consider making Nutley Lane one-way for motor traffic, so there's less land take and more modal shift is encouraged.

The applicant should be required as a condition of any planning permit for all CBC schemes to revisit all time-plated R-/L-turns to add in a plate 'Except Cyclists' in the interests of trip coherence and the promotion of modal-shift to cycling.

To deal with the widespread breaching by drivers of the prohibited L-turn at Nutley Road junction a filtered permeability chicane should be a planning condition made on the road authority. Ideally it would be better to introduce filtered-permeability at the Seaview Terrace-Nutley Road interface. Seaview Terrace was a cul-de-sac when built in c. 1824. Nutley Road was only constructed in c. 1950 and connection made between the two then. Modal-shift to active travel has to be driven by curtailing motor vehicle use.

Ends