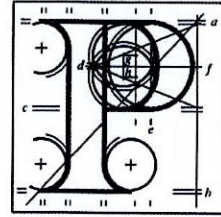


Our Case Number: ABP-314056-22



**An
Bord
Pleanála**

Dublin Commuter Coalition
5 Abbeyfield
Killester
Dublin 5

Date: 26 September 2022

Re: Liffey Valley to City Centre Core Bus Corridor Scheme.
Fonthill Road to High Street all in the County of 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 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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

BL50A

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Dublin Commuter Coalition
5 Abbeyfield
Killester
Dublin 5

ABP case ref: 314056

BUSCONNECTS LIFFEY VALLEY CORE BUS CORRIDOR 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 the more than three years of public engagement finally result in a planning application. We believe this project has the potential to be a catalyst for greater usage of public transport and active travel along the route. However, the proposed design requires significant changes for this to happen and we request an oral hearing to discuss changes.

Enforcement

There are bus and cycle lanes, bus gates, bus priority lights, and turn bans for general traffic 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.

Bus lane operating hours

The bus lanes in the Proposed Scheme between High Street and James Street/Bow Lane West have operational hours of 07:00-19:00 Mon-Sun. Bus journeys through the inner city will still be affected by traffic congestion well after 7pm and therefore need the bus lanes in the Proposed Scheme to be operational. During times when there may be no traffic congestion such as late at night, clearly, there's no need for vehicles to have access to them anyway. We request that these bus lanes be made 24hrs like the rest of the Proposed Scheme.

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.

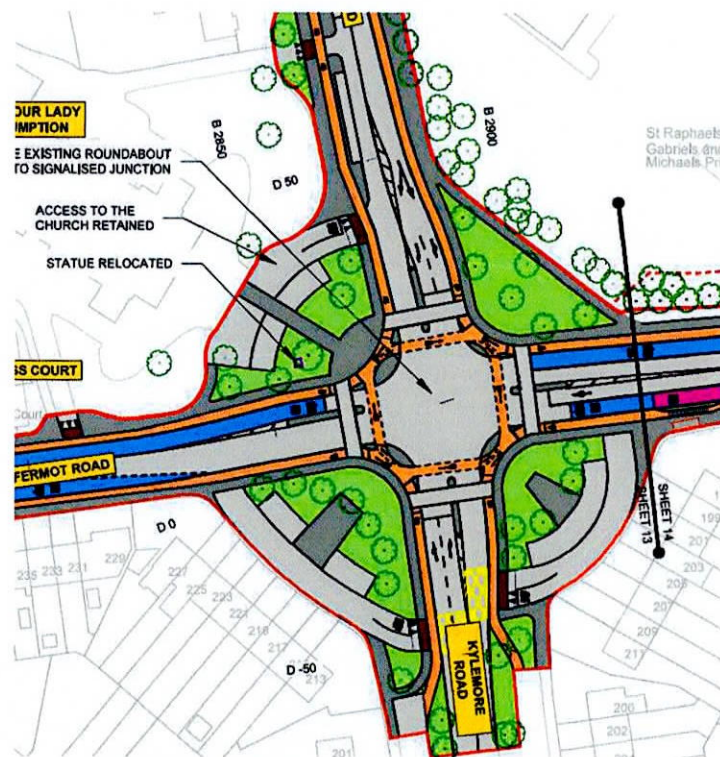


Figure 1 NTA's 'Dublin-style' junction on Ballyfermot Road

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, the following junctions provide no protection for cyclists at all and we request that they be redesigned to provide full segregation between cyclists and other road users:

- Sarsfield Road/Landen Road
- Sarsfield/St. Laurence's

Pedestrian crossings

There are 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. Section 4.4.3 Junction Design of the Design Manual for Urban Roads and Streets states that "designers should omit staggered crossings in favour of direct/single phase crossings" and Section 4.3.2 Pedestrian Crossings states that "designers should allow pedestrians to cross the street in a single, direct movement" and that "where staggered/staged crossings currently exist they should be removed as part of any major upgrade works".

The following two-stage pedestrian crossings are clearly inconsistent with the Design Manual for Urban Roads and Streets:

- Sarsfield Road/Landen Road
- James Street/St. James's

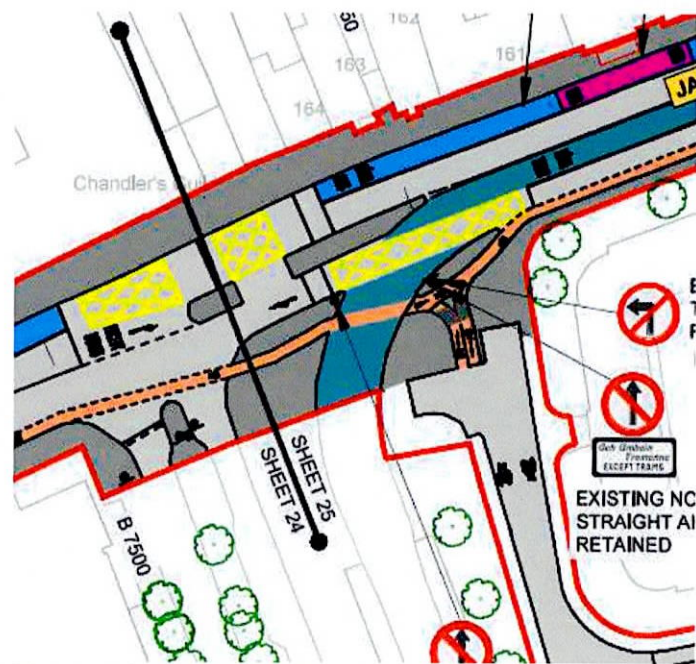


Figure 4 Junction outside St. James's with one two-stage pedestrian crossing and no pedestrian crossing facilities on the other two arms of the junction

Furthermore, many three and four-way junctions are missing pedestrian crossings entirely on one or more arms. 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. Section 4.4.3 Junction Design of DMURS states that “designers should provide crossings on all arms of a junction” and Section 4.3.2 Pedestrian Crossings states “designers should provide pedestrian crossing facilities at junctions and on each arm of the junction”.

These junctions are clearly not in compliance with DMURS:

- Sarsfield Road/St. Laurence’s Road
- James Street/St. James’s
- James Street/Echlin Street
- James Street/Watling Street
- Thomas Street/Bridgefoot Street
- Thomas Street/Meath Street

Bus stop design

A major concern throughout the Proposed Scheme 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 by removing conflicts

between buses and bicycles. However, narrow islands place cyclists in conflict with boarding and alighting bus passengers.

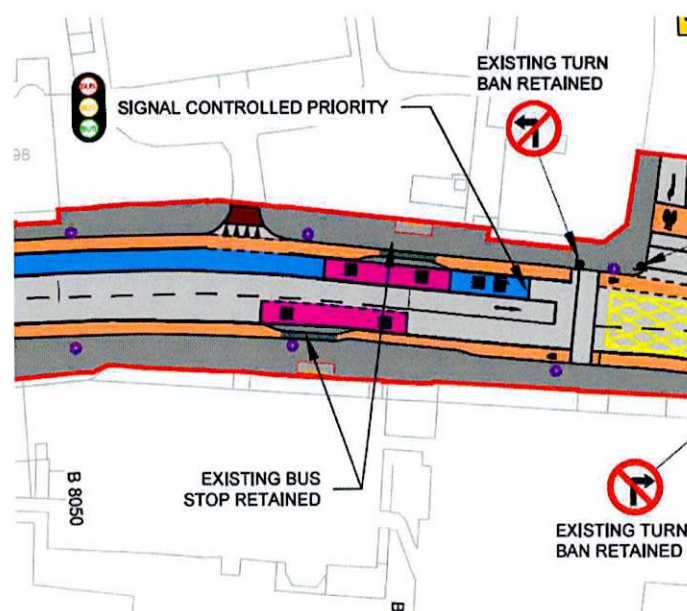


Figure 5 Bus stops with inadequate bus stop islands for cycling on James Street near Watling Street

We ask that the following bus stops be redesigned to provide adequate separation between buses, pedestrians, bus passengers and cyclists for everyone's safety:

- Ballyfermot Road near Clodcut Crescent (westbound)
- Ballyfermot Road near Cloiginn Park (westbound)
- Ballyfermot Road near Drumfinn Road (eastbound)
- Ballyfermot Road outside Tesco (westbound)
- Ballyfermot Road near Kylemore Road (westbound)
- Ballyfermot Road outside Markiewicz Park (westbound)
- Ballyfermot Road near St. Laurence's Road (both directions)
- Sarsfield Road near St. Mary's Avenue West (westbound)
- James Street near Echlin Street (both directions)
- James Street near Watling Street (both directions)
- James Street near Bridgefoot Street (both directions)
- Thomas Street near Francis Street (both directions)
- High Street outside St. Audoen's Church (both directions)

Bike parking

The Section 6.3 Baseline Environment of Chapter 6 Traffic & Transport is missing a total of 62 existing bike parking spaces from several locations within the redline boundary:

- 5 stands on Emmet Road outside McDowell's (10 spaces)
- 5 stands on Emmet Road outside Flowerpop (10 spaces).
- 3 stands on James Street outside Mace (6 spaces)
- 15 stands on James Street opposite Vicar Street (30 spaces)
- 3 stands on Francis Street outside Reilly's Pharmacy (6 spaces)

Chapter 4 Proposed Scheme Description does not state where bike parking will be located in the Proposed Scheme nor does it appear in the general arrangement drawings. However, since the general arrangement shows car parking spots at the locations of the existing bike parking stands on Emmet Road, we are assuming that these bike parking stands will be removed.

Removal of 20 bike parking spaces from Emmet Road would leave a 700 metre stretch between Spa Road and Inchicore Library with no bike parking. This section has restaurants, retail units, a church, community facilities and other amenities as well as dense residential units. This is a very regressive step and one we wish to see reversed.

Objective MTO14 of the Dublin City Development Plan 2016-2022 states that "it is an Objective of Dublin City Council to review availability of bicycle parking facilities at neighbourhood centres with a view to addressing any shortfall through provision of Sheffield-type bicycle parking in the immediate vicinity as required." The bike parking facilities on Emmet Road were installed in 2021 and 2022 arising out of the review and to address a shortfall that was identified. Therefore, removal of these facilities would be against Objective MTO14 of the Dublin City Development Plan.

Fonthill Road widening

We object to the widening of the existing four lane Fonthill Road at Liffey Valley Shopping Centre to maintain two general traffic lanes in each direction. One of the existing general traffic lanes in each direction should be reallocated for the proposed bus lane to avoid unnecessary road widening.

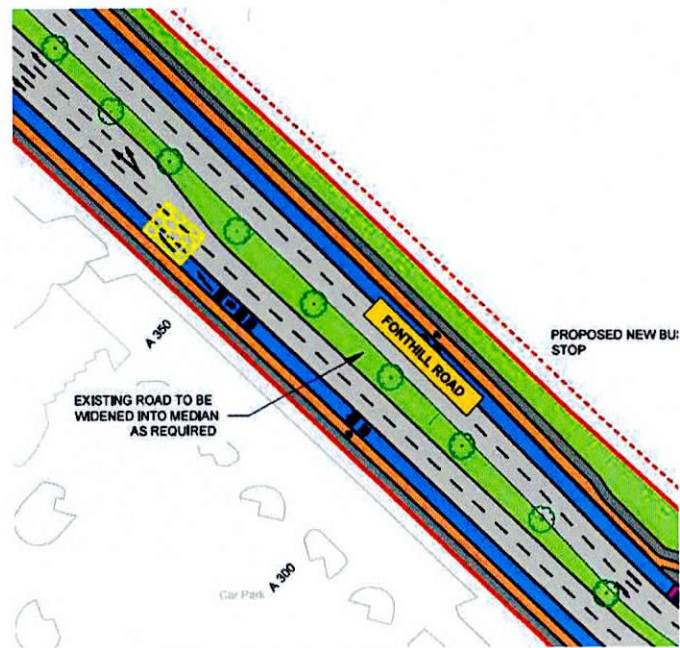


Figure 6 Proposed widening of Fonthill Road

Ballyfermot Road contraflow bus lane

We support the proposed contraflow bus lane on Ballyfermot Road between Le Fanu Road and Kylemore Road. We're especially pleased to see that the operating hours are not restricted and that there will be full bus priority on this section of Ballyfermot Road at all times.

Grattan Crescent contraflow bus lane

We support the proposed contraflow bus lane on Grattan Crescent between Sarsfield Road and Inchicore Terrace. We're especially pleased to see that the operating hours are not restricted and that there will be full bus priority southbound on Grattan Crescent at all times.

Emmet Road

The Proposed Scheme on Emmet Road has narrow footpaths and no safe cycling infrastructure while there is provision for almost 100 on-street parking spaces. This design is entirely unsuitable for a busy commercial and residential urban road.

This focus on providing on-street car parking spaces even through compulsory purchase orders has resulted in narrow footpaths with pedestrian pinch points that do not currently exist such as outside the pedestrian entrance to Inchicore College of Further Education and outside Small Change. This prioritisation of car parking spaces

above pedestrians is clearly incompatible with the DMURS requirement to consider pedestrians first when designing urban streets and it is difficult to reconcile this design with any national or local policy objectives to prioritise walking.

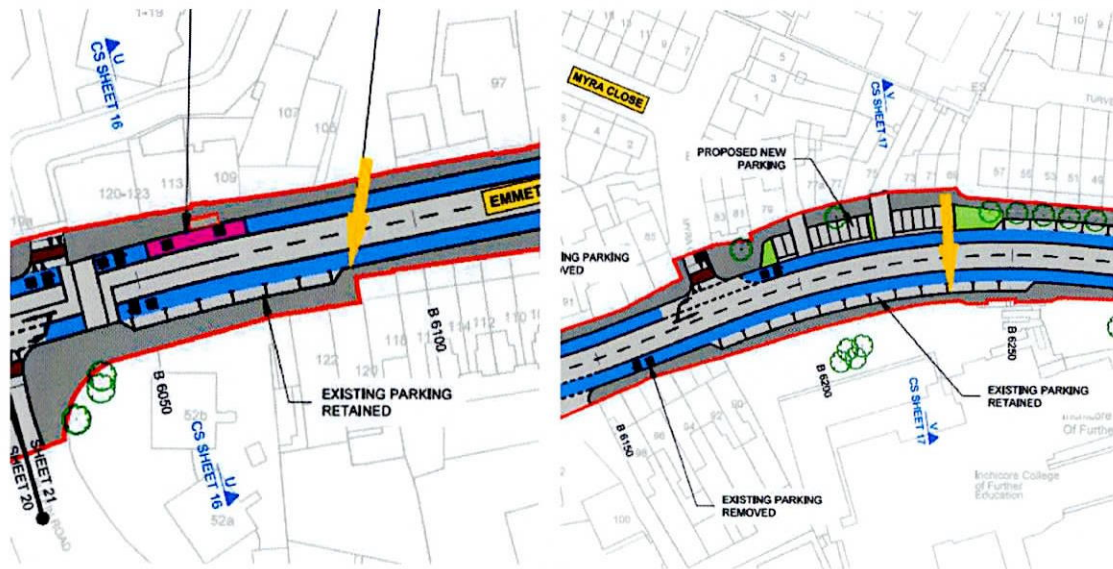


Figure 7 Pedestrian pinch-point outside a commercial area caused by narrowing of the existing wide footpath to provide on-street car parking

Despite the bus gates at Mount Brown and James Street, according to Section 6.4.6.3.8.3 of Chapter 6 Traffic & Transport, traffic flow on Emmet Road is only predicted to reduce modestly; from 1307 to 917 PCUs in the AM peak. This is the lowest % decrease in traffic flow out of all roads in the Proposed Scheme. We see this as a direct result of the car-dominated design of Emmet Road.

We propose that, at a minimum, the Proposed Scheme omit 5 parking spaces outside the pedestrian entrance to Inchicore College of Further Education and 3 parking spaces outside the commercial area between Small Changes and Flowerpop.

Mount Brown and James Street bus gates

The proposed bus gates on Mount Brown and James Street are a key element of the entire scheme. We support the installation of the bus gates but, as a result of the extremely limited operating hours proposed, they provide little benefit for bus passengers or cyclists for most of the day.

The bus gates provide bus priority inbound between South Circular Road and James's between 6am and 10am and outbound between Luby Road and Elchin Street between

4pm and 8pm. They are vital to the predicted 26% (9.4 minutes) journey time reduction for inbound G2 bus passengers in 2028 (AM) and 20% (6.6 minutes) in 2028 (PM) and the 9% (2.5 minutes) journey time reduction for outbound G2 bus passengers in 2028 (AM) and 10% (3.0 minutes) in 2028 (PM). However, the Authority completely fails to consider traffic flows and journey times outside of the peak hours. The majority of bus journeys through this area will be made outside the four operational hours proposed for each bus gate and the Proposed Scheme will provide little improvement for these bus passengers.

Given the complete lack of safe cycling infrastructure between Inchicore and St. James's in the Proposed Scheme, the bus gates also play a vital role in reducing traffic to make cycling along Old Kilmainham and Mount Brown safer.

This scheme proposes no bus priority and no traffic reducing measures for safe cycling between Inchicore and St. James's for 20 hours of the day. We insist that the bus gates in the Proposed Scheme be made 24 hours a day Monday to Sunday.