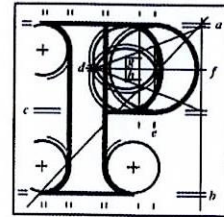


Our Case Number: ABP-314056-22



**An
Bord
Pleanála**

Dublin Cycling Campaign
Tailor's Hall
Back Lane
Dublin
Dublin 8
D08 X2A3

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.

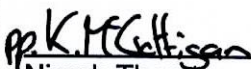
Dear Sir / Madam,

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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D01 V902	D01 V902



Dublin Cycling Campaign

% Tailor's Hall

Back Lane

Dublin 8

D08 X2A3

13 September 2022

Liffey Valley to City Center Core Bus Corridor (Case: 314056)

1.0 Introduction

Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. We have a vision for Dublin that is a vibrant city where people of all ages and abilities choose to cycle as part of their everyday life.

We have been engaging with the applicant, National Transport Authority, through all stages of this project including the multiple rounds of public consultation, community forums, and through one to one meetings.

We are supportive of the proposed scheme and encourage the board to approve the scheme with minor modifications. We do not request an Oral Hearing.

2.0 Reasons for Support

- Improved Bus Journey Times
- Continuous Cycle Route from Liffey Valley to Chapelizod Bypass
- Continuous Cycle Route from James' Hospital to High Street
- Separating people cycling from buses at bus stops
- Through-traffic reduction in Ballyfermot, Inchicore and Mount Brown
- Closure of O'Hogan Road Junction
- Reducing the size of the junction at Cornmarket to make it more people-friendly

3.0 Requested Modifications via Condition

3.1 Alternative junction design in HGV-prone areas

The junctions on Fonthill Road and Coldcut Road (general arrangement drawing sheet 1-2) are large junctions in a retail park area. The applicant outlines the junction design types in EIAR Appendix 'A6.3 Junction Design Report'. The proposed junction design on Fonthill Road and Coldcut Road are Junction Type 1-3. Junction types 1-3 are not suitable for people cycling for areas with large volumes of turning traffic or areas with large numbers of HGVs. The reason is that people cycling and turning motor traffic move at the same time in junction types 1-3, whereas in Junction Type 4 people cycling have a separate light signal to motor traffic, which entirely eliminates any conflict.

We request: that these junction designs be altered to Junction Type 4 as that would significantly improve safety for people cycling at these large junctions where there are HGVs.

3.2 Junction of Chapelizod/Kylemore Road

The junction of Chapelizod/Kylemore Road/Le Fanu Road on general arrangement sheet 12 is not any of the approved junction designs in the NTA's National Cycle Manual (2013) or the BusConnects Preliminary Design Manual (2022). The northbound cycle track on Kylemore Road ends abruptly in the footpath. This creates an inconsistent and incoherent cycling network.

We request: this junction be modified to a standard junction design, such as 'Advance Stacking Location: Single Lane' from NCM page 77, that provides clear space for people cycling to continue straight without mounting the footpath or merging into traffic abruptly just before the junction.

3.3 Loss of Cycle Parking on Emmet Road

We are concerned at the loss of cycle parking outside commercial areas along Emmet Road, for example outside Flowerpop (122 Emmet Road) and Frontline Bikes (151 Emmet Road) to provide space for car parking. Currently, there is cycle parking outside both of these commercial areas. EIAR Chapter 6 page 35 notes that there will be no cycle parking provided along a 700m stretch of Emmet Road from Spa Road to Inchicore Library. However, multiple car parking spaces are proposed for the commercial areas.

We request: that three car parking spaces along Emmet Road outside commercial areas be converted to provide adequate cycle parking.

3.4 Traffic Calming for Quiet Street Cycle Route

The applicant proposes a Quiet Street cycling arrangement on Echlin Street, Grand Canal Place, Basin View and Newington Lane (general arrangement drawings sheet 25). The applicant has proposed no traffic calming on these streets. The existing roads do not comply with the latest guidance from DMURS about self-regulating streets that are designed to encourage low-speeds. The streets feature design elements like large corner radii and long straight sections that encourage speed. For this to be a successful and safe quiet street for cycling it needs to be actively designed to be a slow street. The applicant only proposes painting bicycles on existing streets with outdated street designs.

We request: traffic calming elements be added to these streets to ensure a self-regulating street in accordance with DMURS.

3.5 Minimum Cycle Track Widths

The minimum acceptable width for a kerb protected cycle track is 1.5m otherwise certain types of cycles will be excluded. At two locations the cross sections show cycle tracks of 1m with high kerbs on both sides. Those are cross-section O-O Ballyfermot Road and cross-section Z-Z Thomas Street.

Many people use tricycles, recumbent cycles, cargo bikes, and handcycles because of their disabilities. There is no guidance in the National Cycle Manual or DMURS about ensuring equitable access to cycling infrastructure for people with disabilities. Nonetheless, state agencies do have a public sector duty¹ to eliminate discrimination and ensure equal access for all.

Wheels for Wellbeing, a UK-based inclusive cycling charity, provides guidance on these matters in their Inclusion Cycling Guide V3². Page 42 recommends an absolute minimum width of 1.5m for cycle tracks to ensure inclusion of 'non-standard' cycles.

¹ Section 42 of the Irish Human Rights Commission Act 2014:

<https://www.irishstatutebook.ie/eli/2014/act/25/enacted/en/print#sec42>

² Inclusive Cycling Guide V3:

https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf

We request a condition to ensure that all cycle tracks be designed with adequate width to ensure equal access for all users including those with disabilities using adapted or non-standard cycles.

3.5 High Street Multiple General Traffic Lanes

High Street (general arrangement drawings sheet 28) includes space for multiple general traffic lanes but provides sub-standard width cycle tracks. There are a limited number of cross-sections in this area but cycle tracks are below the 2m standard width for long sections of this street. The cycling campaign accepts the need to narrow cycle tracks in some areas where space is limited, however on High Street space isn't limited. High Street is one of the widest streets along the entire corridor and even here the cycle tracks are being narrowed to provide a second general traffic lane.

High Street is identified as primary cycle route 7 in the NTA's Greater Dublin Area Cycle Network Plan (2013). Primary cycle routes are the main cycle routes for the network; they aim to provide a higher level of service, as defined by the National Cycle Manual (NCM), than other identified routes.

The proposed width of these cycle lanes would only achieve a quality of service Level D (NCM pg 10), far below the expectations for a primary cycle route.

Is it accepted public policy to provide multiple traffic lanes for private cars before providing adequate space for cycling at key city center locations?

We request: that the second general traffic lane be removed to provide adequate space for people cycling along this key city center cycling link.

4.0 Conclusion

We broadly support the proposed application, but with several submissions for changes. We seek a number of minor modifications that could be achieved via condition. We do not request an oral hearing.

Ellen Cullen
Chairperson
Dublin Cycling Campaign