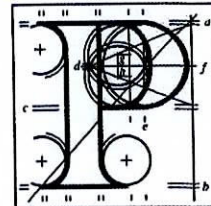


**Our Case Number:** ABP-316828-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

**Date:** 19 July 2023

**Re:** Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.  
Tallaght/Clondalkin to Dublin City.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development 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 note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

HA02A

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64 Marlborough Street  
Dublin 1  
D01 V902



An  
Bord  
Pleanála

## SID Online Observation

Online Reference  
SID-OBS-000962

### Online Observation Details

Contact Name  
Feljin Jose

Lodgement Date  
04/07/2023 16:02:33

Case Number / Description  
316828

### Payment Details

Payment Method  
Online Payment

Cardholder Name  
Feljin Jose

Payment Amount  
€50.00

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

Yes  No

Request Emailed to Senior Executive Officer for Approval

Yes  No

Signed

EO

Date

### Finance Section

Payment Reference

ch\_3NQAkPB1CW0EN5FC0FHNfJQo

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board  
Member

Date

Date



Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

ABP case ref: 316828

## **BUSCONNECTS TALLAGHT/CLONDALKIN 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.

### **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, rendering the core mission not achieved. We strongly urge the NTA implement effective measures to secure the protection of bus lanes from illegal use.

## Bus lane operating hours

We strongly believe that all proposed bus lanes and bus gates should be operational 24/7. We believe this will have the following benefits:

- More achievable and reliable bus journey times
- Easier to enforce as there are no time specific allowances for private vehicles
- Highlights priority of public transport over private transport, leading to higher adoption from users
- In the absence of segregated cycle lanes, 24/7 bus lanes offer cyclists safer road space with less traffic

## Junction design

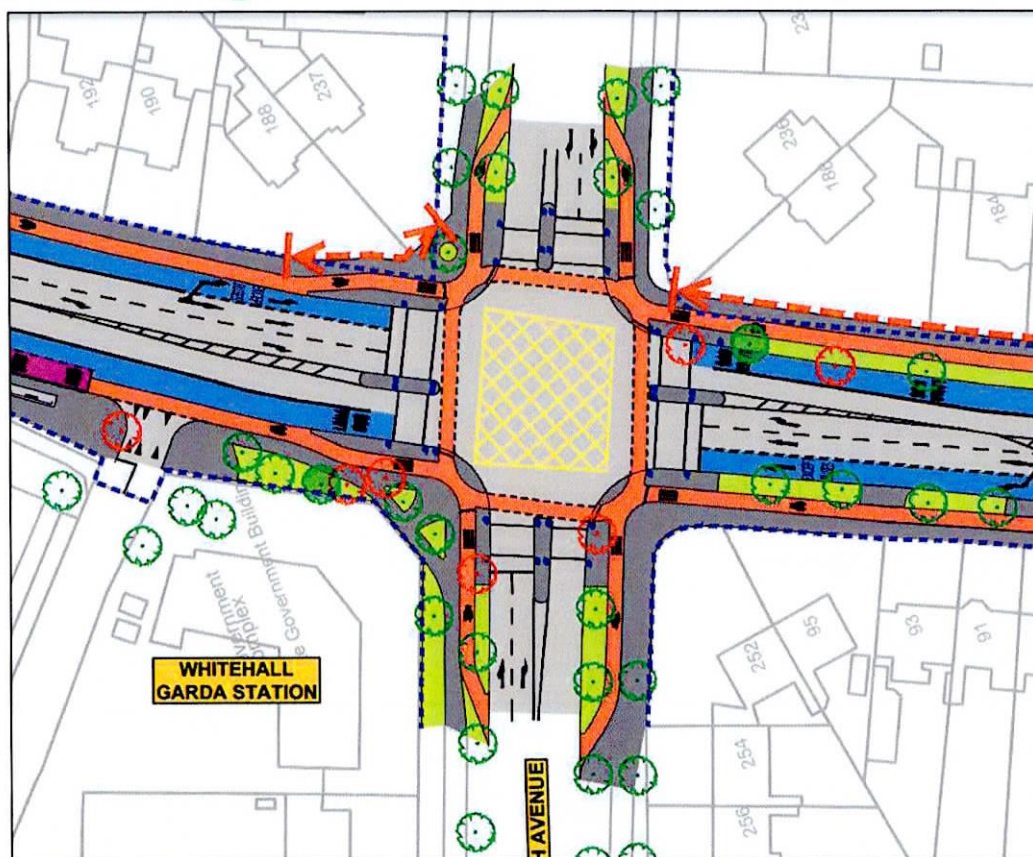


Figure 1 Dutch-style junction at Swords Road/Griffith Avenue from the second public consultation

The junction designs in the Proposed Scheme do not follow international best practice in junction design and are widely regarded as unsafe. We request that the NTA use Dutch-style junctions throughout the project.

### **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".

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".

### **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.

### **Shared space**

We recognise that similar commentary criticising the excessive use of shared space for pedestrians and cyclists has been provided by other observers, cycling advocates and disabilities groups to this application and other recent Core Bus Corridor projects. There is an inadequate and poorly designed fait-accompli present within the subject scheme and other comparable projects, whereby a compromise to retain space for car traffic is prioritised over segregated or safe integration of active travel modes.

Throughout the consultation processes it has been highlighted as a short-coming of the Bus Connects programme that international best practice or safe and innovative solutions have not been implemented or duly considered. We also would like to criticise and caution that strict adherence to out of date Irish standards will not, in combination, contribute to a safe and attractive environment for pedestrians or cyclists.

There are many junctions where the use of shared space pavement is provided where turning movements or yield areas are created for cyclists who are forced into the same spaces as pedestrians. This is significantly sub-standard given the wider scope of the Core Bus Corridor project and the potential influence it can have on the overall modal split within the Metropolitan area. This substandard design has the potential to seriously injure the vitality and usability of the public realm for the general public. Of particular concern is the conflict and danger presented by the use of shared space where it concerns those with disabilities, who may not be able to react or respond to the additional danger presented by shared space with cyclists adequately. Such additional risk can damage the reputation and general perception of the public realm and particular roads for the independent mobility of all road users.

The very nature of the Core Bus Corridor programme of investment is to improve the movement and segregation of transport modes away from car dependency and to reduce conflicts and congestion between existing modes. It is anathema to the purpose of this project to continue to provide sub-standard and ill-considered shared use where alternatives and segregation are possible.

We strongly recommend that where issues have been highlighted by others that the Board considers interventions and improvements for the general safety and comfort of the public.

## **Bicycle Parking**

Chapter 4 of the proposed scheme does not state where bike parking will be located in the Proposed Scheme nor does it appear in the general arrangement drawings.

The following policies of the adopted Dublin City Council Development Plan 2022-2028 address the allocation, protection, and creation of cycle parking facilities.

*'To improve existing cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages, and to create protected cycle lanes, where feasible. Routes within the network will be planned in conjunction with green infrastructure objectives and the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policies GI2, GI6 and GI8 and objective GI02.'*

#### **SMT012 – Cycle Parking Spaces**

*'To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.'*

In our considered opinion it is important to provide for the best quality bicycle parking facilities at bus stops and public transport interchange locations over the length of the proposed project. Whilst much of the proposed scheme concerns itself with road engineering and traffic management, it is also a project which provides for a significant linear improvement to the public realm. In order to provide for a significant modal shift for walking and cycling it is vital that the best possible opportunities for considered cycle parking are provided in conjunction with cycling infrastructure. We recommend that the Board consider the newly adopted Development Plan in relation to this provision at that conditions be set to provide for additional identified areas of dedicated cycle parking and rational inclusion of stands and storage locations which complement the provided cycle lanes and interface with public transport stops and interchanges.

### **Segregation of cyclists and motor traffic**

The Proposed Scheme lacks segregation of cyclists from motor traffic along the Greenhills Road, at the roundabout of Greenhills Road/Calmount Avenue and several junctions such as Calmount Avenue/Calmount Road, Ballymount Avenue/Greenhills Road etc. It's unacceptable that the applicant would propose on-road unsegregated cycle lanes which have been proven to be ineffective and unsafe. We request that these sections be redesigned to segregate cyclists properly from general traffic.

### **Nicholas Street**

It's inexplicable why the carriageway widens from one inbound general traffic lane to two as Nicholas Street approaches High Street. To facilitate this, the cycle lane is narrowed to a substandard 1.3m and the footpath is narrowed to 1.5m. This is completely unsafe and unsuitable in a city centre location with large numbers of people walking and cycling.

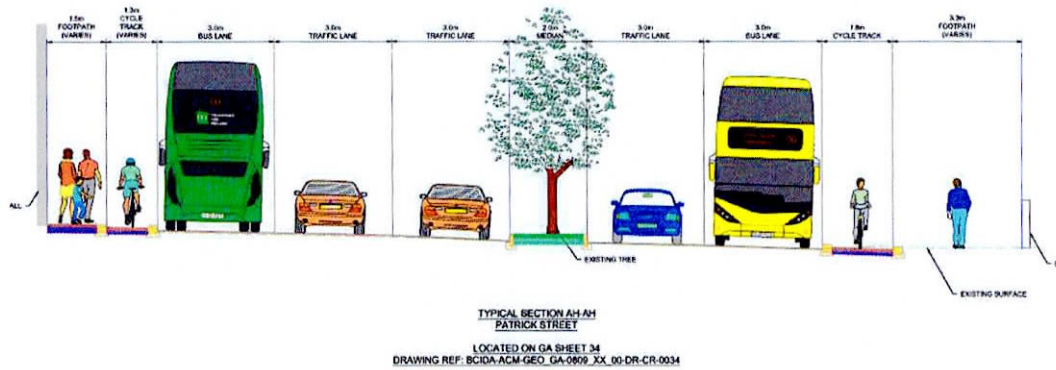


Figure 2 Cross section at Nicholas Street

Closer to High Street, bus priority disappears when it's needed the most to facilitate a third general traffic lane. At this city centre location, the scheme prioritises car traffic over public transport, walking and cycling and needs to be redesigned to reflect local and national transport policies.

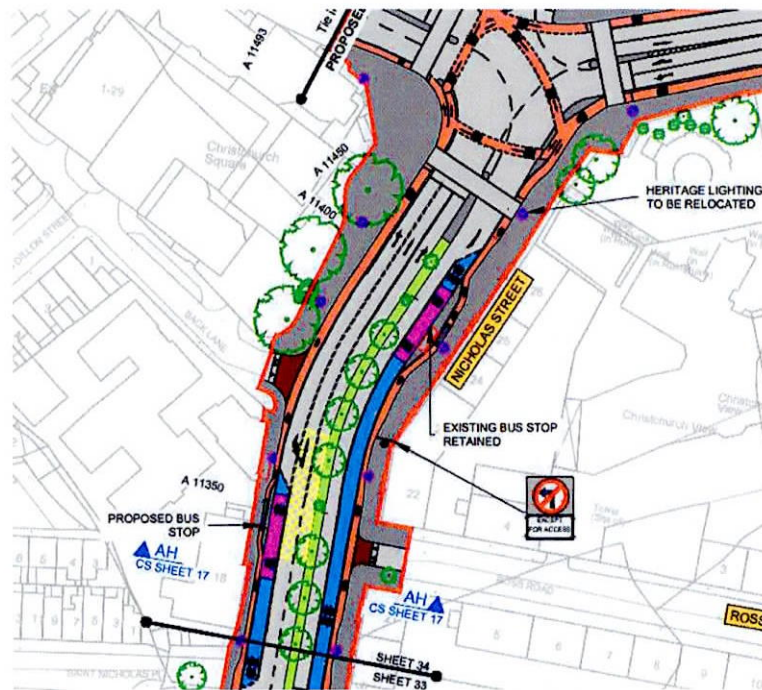


Figure 3 General arrangement of Nicholas Street



## Naas Road/Long Mile Road junction

This junction is simply terrible for pedestrians and cyclists and needs to be completely redesigned.

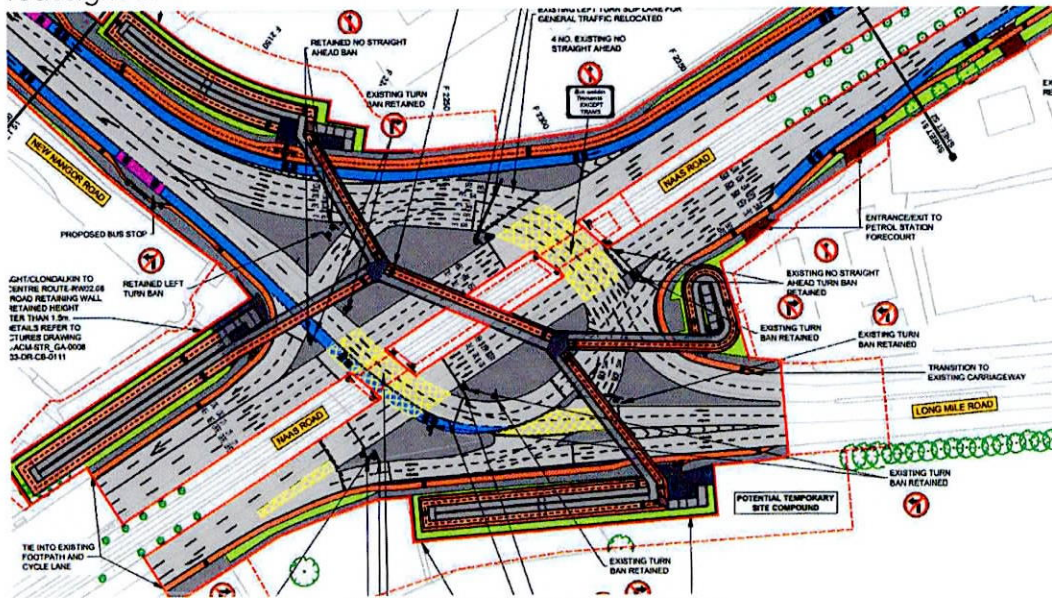


Figure 4 Naas Road/Long Mile Road junction