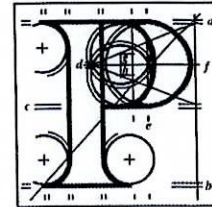


Our Case Number: ABP-316828-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Dublin Cycling Campaign
c/o Taylor's Hall
Back Lane
Dublin 8
D08X2A3

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

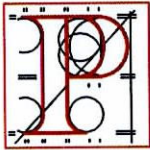
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Dublin 1
D01 V902



An
Bord
Pleanála

SID Online Observation

Online Reference
SID-OBS-000964

Online Observation Details

Contact Name
Colm Ryder

Lodgement Date
04/07/2023 16:37:14

Case Number / Description
316828

Payment Details

Payment Method
Online Payment

Cardholder Name
colm ryder

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_3NQBHyB1CW0EN5FC087w2h9F

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 Cycling Campaign

% Tailor's Hall

Back Lane

Dublin 8

D08 X2A3

4 July 2023

Tallaght / Clondalkin to City Center Core Bus Corridor

(ABP Case: HA29N.316828)

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 but we are disappointed that there are still some major improvements required to assist the scheme through the communities it serves.

2.0 Reasons for Support

- Improved bus accessibility and journey times
- Improved safety for people walking and cycling by providing segregation from traffic, despite non optimal examples at some locations
- Separating people cycling from buses at bus stops (in some locations)

3.0 Requested Modifications via Condition

One of the major goals of this Bus Connects project is to provide a cycle route that is safe and comfortable for people of all ages and all abilities. Only by enabling many people to cycle, by making it a realistic choice, can we deliver the potential modal shift changes.

3.1 Comfort Levels Cycling Alongside the Bus Corridor Routes

In general we are supportive of the cycle facilities proposed. They will provide a vital and comfortable missing link for people in outlying areas to cycle to and from the city centre.

Ideally the cycle route should be separated from the busy main traffic routes, or these routes should be significantly calmed/slowed down. However, that is not always possible. This means that the comfort levels for those cycling along this route will be lower as they will be exposed to the noise from the adjacent roadway. Comfort is one of the five needs of cycling defined in the National Cycle Manual (section 1.2.5).

EIAR Appendix Figure 9.1.1 shows the noise mapping for day time in the opening year where people cycling will be exposed to noise pollution in excess of 75dB. This would be above the 60dB(A) threshold recommended in TII's management for noise on national roads guidance from 2004, which was updated in 2014. It would also be considered high by the Dublin Agglomeration Action Plan relating to The Assessment and Management of Environmental Noise December 2018 – July 2023, which all four Dublin local authorities are a party to as part of compliance for the EU's Environmental Noise Directive (END) 2002/49/EC.

We request a condition to ensure noise levels are maintained at an appropriate level to ensure comfort in the use of the cycle tracks and pedestrian facilities.

We recommend a minimum 600mm bio-diverse wildflower & tree buffer between motorised traffic and cycling and pedestrian areas where possible.

3.2 Cycle Track Widths

Throughout the scheme we see a variation in the proposed widths of the cycle tracks. As per the current National Cycling Manual (NCM) guidelines we would expect that all cycle tracks be a minimum of 2.0 m. This width allows overtaking of regular cycles and also will accommodate larger cycles such as tricycles and cargo bikes.

In many cases along the proposed corridors, the width of the cycle track has been

compromised at the expense of standard 3 metre carriageway widths for private vehicles. This compromise should be reversed.

3.3 Cycle Track Continuity

A cycle route is only as good as its weakest link. The plans show gaps in cycle tracks (Crumlin Road) in order to provide short sections of bus lane.

We suggest the scheme would be improved by providing a continuous cycle track (which prioritises safety) over providing short sections of bus lane (which merely improves journey times).

3.4 Filtered Permeability

Through Dublin 12 and towards the city centre the utilisation of filtered permeability is a welcome approach. However in the outer parts of the scheme the reliance on signage and enforcement is the adopted approach. To avoid the requirement for enforcement we would propose that throughout the scheme increased levels of filtered permeability be utilised. This engineering solution will negate the possibility of 'rat-running', will improve traffic calming in the area, and improve the environs for residents.

This would also align with DMURS guidance,

'Filtered Permeability Networks, which restrict universal permeability, may be applied where designers are seeking to prioritise the movement of more sustainable modes (i.e. pedestrians, cyclists and public transport) over private vehicles. For example bus gates and other measures, may also be used to prioritise bus movements, particularly in Centres (see Section 3.4.3 Bus Services). The limited use of vehicular cul-de-sacs may be considered in Neighbourhoods and Suburbs where there is a particular concern regarding through traffic.'

3.5 Quiet Street Treatment

In parts of the scheme there is deployment of the concept of 'Quiet Streets'. However it is not clear what engineering elements are being deployed to harness the environment of a 'Quiet Street'.

For example the Crumlin and Drimnagh areas, where these 'Quiet Streets' are being deployed, are heavily trafficked, and there is a considerable amount of vehicle parking (including illegal parking).

To ensure the concept of a 'Quiet Street' is deployed and successful we propose that engineering designs are utilised to reduce the width and speed of the carriageway to make it a safe and comfortable route for cyclists as well as denoting that cyclists should have priority. This can also be highlighted through the use of a red asphalt surface top.

The Dutch guidance for such a street (as per CROW Design Manual for Bicycle Traffic) outlines some of the following implementations and considerations, which we recommend for consideration:

- The colour of surfacing red (to make cycle route recognisable)
- No marking on the carriageway
- Width of vehicle path 4.5m
- Safe for cyclists
- Comfortable for cyclists
- Clear to motorists that there is a cycle route

For the entire Bus Connects program we would suggest that Quiet streets are given a distinct uniform surfacing to denote their purpose. In addition we would suggest that vehicle parking be limited, and when provided is designed in such a way as to protect the cyclist. Interventions such as build-outs and chicanes, perhaps accommodating trees, could be used to further cultivate a 'Quiet Street' environment.

3.6 Speed Limits

We warmly welcome the further roll-out of 30 km/hr speed limit within this scheme. Dublin Cycling Campaign are hopeful that an overall default 30kph speed limit will soon be deployed throughout the City. However it is noted that some major residential roads such as Crumlin Road, Walkinstown Road and Kildare Road a 50 km/hr speed limit is being retained.

In addition we have concerns about the requirement for enforcement, and for this reason request that driver behaviour with respect to speed limits is cultivated through engineering design.

The following excerpts from DMURS outline this requirement. For this reason we expect that DMURS is adhered to, rather than the reliance on enforcement with respect to speed management.

'The speed at which drivers travel is principally influenced by the characteristics of the street environment

If the design of a street creates the perception that it is safe to travel at higher speeds drivers will do so, even if this conflicts with the posted speed limit

Integrated approaches incorporate elements of urban design and landscaping that instinctively alter behaviour, thus reducing the necessity for more conventional measures (such as physical barriers and the road geometry) alone to manage behaviour. The attraction of this approach is that it creates a new dynamic and a 'win-win' scenario where:

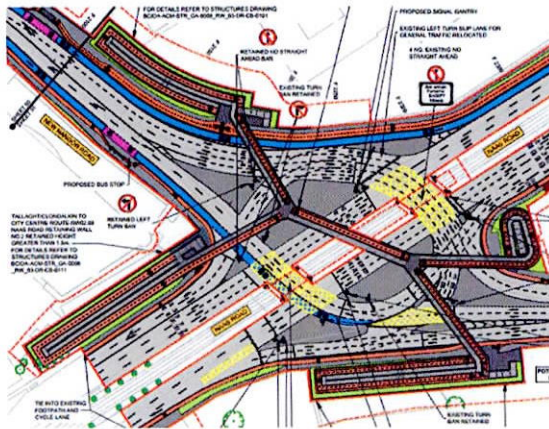
- *Street networks are simpler in structure (more legible) with higher levels of connectivity (more permeable) thus reducing travel distances.*
- *Higher quality street environments attract pedestrians and cyclists, promoting the use of more sustainable forms of transport.*
- *Self-regulating streets manage driver behaviour and calm traffic, promoting safer streets.'*

4.0 Specific Location Comments

The following observations are proposals which we believe should be considered as this Bus Connects Corridor progresses to the detailed design phase. We submit that the majority of these points should be dealt with by condition attached to any grant of planning permission.

4.1 Naas Road Junction

The most complex junction on this project route is the Nangor Road to Longmile Road, crossing of the Naas Road. Unfortunately the design concept proposed for moving people walking and cycling is somewhat uninspired, and we fear it will not particularly encourage more people to walk or cycle (or to feel safe) across this complex junction. We seek a more inspired design solution for active travel across this junction to assist the overall project's success. Below we show an image of the Hovenring in Eindhoven as an example of inspired architecture providing form and function over the rather uninspired overpass currently proposed for this Naas Road junction.



Current Proposed Overpass



Hovenring Overpass, Eindhoven

4.2 Walkinstown Roundabout

Although previous improvements were welcome (reduction in shared space), the proposed design routing of cyclists through Walkinstown Roundabout remains difficult and convoluted. It is still short of its potential to be safe for all users. The roundabout design does not allow for more direct transit by bike and as such will discourage many cyclists from using the proposed design who will continue to use the main road, with potential for incidents, collisions and perhaps fatalities. We believe a deeper design review must be carried out on this landmark junction, to avoid the above.



Current Proposed



Houten Roundabout

4.3 Bus Stop Bypasses

It is disappointing that a number of bus stop bypasses are not included, particularly where there appears to be adequate space. We recommend a review of bus stop locations along the route and greater introduction of bus stop by-passes in general, to reduce incidences of conflict between cyclists and pedestrians.

4.4 Specific Junction Design

As raised in previous consultations on this scheme we continue to have grave concerns over junctions on Crumlin Road, South Circular Road, Dolphins Barn, Cork Street, Patrick Street and Christchurch. Minimal to no safe separation is provided to people on cycles at these junctions, no clear provision for right turning cyclists is provided, and we consider them dangerous and an inherent risk to life.

4.5 Raised Table Extensions

Raised tables across junctions and side roads should be extended to accommodate the cycle lane also and give right of way priority to people cycling, as well as walking, from traffic turning on to or off the main road. See images below.

4.6 Bike Parking

At the detailed design stage we recommend the introduction of secure cycle parking throughout the scheme, particularly at bus stops and various commercial services and community facilities. This would have the double benefit of increasing the catchment area of people accessing the Bus Connects system.



Existing (typical type)	Preferred
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5.0 Conclusion

This Core Bus Corridor, along with the Bus Connects project is a huge opportunity to help develop a safe public transport and cycling network for all. It is for this reason that we want to see the Core Bus Corridors built.

As referred to above Dublin Cycling Campaign feels that real consideration needs to be provided to how people locally are also accessing and using the Core Bus Corridor, and the ancillary cycle lanes, in order for it to work within the communities it serves and ensure safety for people on cycles.

- We broadly support the Tallaght / Clondalkin to City Centre Bus Connects Scheme;
- We request alterations to some elements of the design, as outlined above, to ensure a coherent and aesthetic design. Essentially we seek reduced vehicle speeds, increased filtered permeability, formalisation of the concept of Quiet Streets, and greater comfort on appropriate cycle track widths;

Ellen Cullen
Chairperson
Dublin Cycling Campaign
ellenc@dublincycling.com