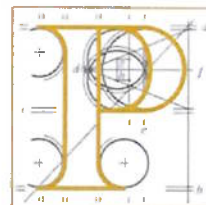


Our Case Number: ABP-317679-23



**An
Bord
Pleanála**

Cllr Claire Byrne
City Hall
Dublin

Date: 04 October 2023

Re: Ringsend to City Centre Core Bus Corridor Scheme.
Ringsend to City Centre, Co. Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the mean time, please contact the undersigned officer of the Board at laps@pleanala.ie

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

HA02

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An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

3rd October 2023

Observations on the Ringsend to City Centre Core Bus Corridor Project

SID Ref: 317679

To whom it may concern,

Please see below my observations on the proposed Ringsend to City Centre Core Bus Corridor.

Coordination with Other Projects:

There does not seem to be good coordination with other key projects in the area such as the Dodder Greenway, The Coastal Mobility Route, the new Draft City Centre Traffic Management Plan and the National Demand Management Strategy and the forthcoming Library Square redevelopment.

In particular, the overall scheme does not take into account changes in traffic volumes as a result of the city centre traffic management plan and the national demand management plan that will greatly reduce the throughflow of private vehicles in the city. In particular, with regards to the quays, the plan appears to be based on the current volumes of traffic and is designed to continue to accommodate 4 lanes of traffic. This is a deeply flawed approach that is incongruent to both city and national policy.

The Scherzer Bridges

The two Scherzer bridges are iconic protected structures and are central to the city's vista and heritage. The proposal to move the bridges to make way for additional lanes to accommodate private vehicles is extremely costly and does not appear to be good conservation practice given their historical, cultural significance. A better approach would be to preserve the bridges and focus on improving the cycle and pedestrian access here rather than expanding to accommodate more private vehicles.



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The North Quays

The current cycle lanes and pedestrian paths are too narrow and there does not appear to be a proposal to amend that and make them wider and safer. This should be a priority in the plan. The reason given is because of constraints caused by existing structures; however the increase from three to four lanes along much of the quays is also a significant factor here. Cycling and walking capacity is compromised to provide increased capacity for motorised vehicles. This is in contravention of the DMURS hierarchy of modes approach to street design.

Junction at Samuel Beckett Bridge

There is a significant amount of conflict at this bridge between all users and there is room for improvement to make it safer and more usable for pedestrians and cyclists. The proposal to 'do nothing' pending the completion of a new pedestrian / cycling bridge across the River Liffey at Forbes Street / Blood Stoney Road. There have already been significant delays to the delivery of this bridge due to planning issues so we are still years away from it being in place. Therefore interim changes to improve safety and reduce conflict should be considered.

Dodder Public Transport Opening Bridge

The proposed public transport, pedestrian and cyclists bridge is very welcome and is critical to providing better services to the Ringsend and Irishtown area and to the new Poolbeg West development, including building capacity for the proposed Luas to Poolbeg.

Proposed Cycle Route through Ringsend Park:

While we appreciate that after the consultation process that this is the preferred route, there are questions with regards to the rationale for this decision. The proposed path through the park is too narrow and therefore would require removing trees or expanding into the grass area with more concrete resulting in a considerable loss of green space. In addition, the park is heavily used by people of all ages so it is important to ensure that the design would not result in a conflict between those who use the space. The cycle lane should be fully segregated to avoid conflict between cyclists and other park users.

Residents have already noted an increasing encroachment on green spaces in general and in Ringsend Park in particular. Green space is vital in dealing with heavier rainfall as a result of climate change and is important from a biodiversity and wellbeing perspective. Increasing the amount of hard surface in our parks is therefore a retrograde step.



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The park is also used by elderly residents to walk which is why more benches were installed for them to sit and rest. Many of these older people would be intimidated by bikes passing them at high speed.

The proposal to route it on R131 alongside the wall that runs along Pigeon House Road should be revisited. Using the grass verge on the northside of the wall along Pigeon House Road that is currently used for advertising, could provide a safe two way cycle lane that would then connect with the Sean Moore Road and the coastal mobility route, Poolbeg West and the future Luas there.

Another alternative route would be to run it through Thorncastle Street and through the village to create better connectivity with Ringsend village and its wide range of facilities. Again this could be a two way cycle route and could run through Thorncastle Street, Library Square as proposed in the plans for its redevelopment, and connect with the Dodder Greenway at Fitzwilliam Street and Fitzwilliam Quay. It could then connect with the coastal mobility route and the Sean Moore Road by running through Pembroke Street or Irishtown Road. The current plan does not provide safe access to the village and appears to be more focused on being a solution for commuters rather than social and recreational cyclists. The integration of the Bus Connects plan with the other schemes (Dodder Greenway, Library Square and Coastal Mobility) would be much better served by running the cycle route on this route and would provide safe cycling access to core community facilities such as the library, Primary Care Centre, St Patrick's Church and local businesses, while also allowing safe connections to local schools and sporting facilities.

Final comments:

Overall, while the plan is very much welcome and will provide much needed improvements to the bus service and general connectivity for Ringsend, Irishtown and surrounding areas the plan appears to have flawed principles. It displays deviations from the design standards for pedestrians and cyclists but there is no deviation from road standards.

The design assumes that existing traffic volumes for private vehicles will remain as they are at present. This has several negative impacts on the overall scheme including sub-standard provision of walking and cycling infrastructure (specifically, footpath and cycle lane widths), failure to resolve existing conflicts (e.g. conflict between walking and cycling at south end of Samuel Beckett bridge), and the costly relocation of protected structures which are a key part of the industrial heritage of the Docklands.

A broader consideration of local and national policies around traffic management and climate action would suggest a different approach where sustainable transport modes are



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prioritised and dependency on private vehicles is significantly reduced. If we are to reach our transport targets as set out in both the National and City Climate Action Plans, then we must prioritise public transport, cycling and walking in every design plan.

I would be very grateful if you could take the comments above and those submitted by the local Ringsend and Irishtown community into consideration when making a decision on this application.

Best wishes,

CLlr Claire Byrne

CC:

John Gormely

Ciaran Ferrie