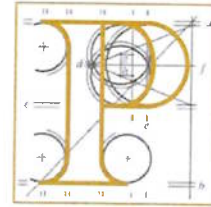


**Our Case Number:** ABP-317679-23



**An  
Bord  
Pleanála**

Ellen Cullen  
Dublin Cycling Campaign  
The Tailors' Hall  
Back Lane

**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](mailto: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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 	<p><b>Dublin Cycling Campaign</b></p> <p>The Tailors' Hall, Back Lane, Dublin, D08 X2A3. <a href="http://www.dublincycling.ie">www.dublincycling.ie</a> RCN 20102029</p>
<p>To: <b>An Bord Pleanála</b></p>	
<p>Date: 2023- October 3rd</p>	
<p>Re: <b><u>Ringsend to City Centre Core Bus Corridor (Case: 317679)</u></b></p>	

## 1.0 Introduction

Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. Dublin Cycling Campaign is a member group of Cyclist.ie the Irish Cycling Advocacy Network, which is in turn the Irish member of the European Cyclists Federation (ecf.com). We have a vision for Dublin of a vibrant city where people of all ages and abilities choose to cycle as part of their everyday life.

We are supportive of the Ringsend to City Centre Core Bus Corridor Scheme, on transport, environmental and health grounds:

### Transport:

The population of Dublin South East has continued to grow since 2019 when this scheme was originally proposed and the route was already at capacity due to high levels of car usage. There is an urgent need to rebalance road space to facilitate fast and attractive bus services and safe and active travel by bike, scooter or on foot.

### Environment:

19% of Ireland's overall greenhouse gas emissions come from transport, with private cars making up approximately 65% of transport emissions in Dublin.

As part of the Climate Action Plan 2023 our transport emissions must be halved between now and 2030. BusConnects can make public transport and active travel an attractive way of getting around the city and contribute to reductions in emissions from transport.

#### Health:

Large numbers of people in Ireland are not meeting recommended levels of physical activity, while 39% of the adult population are overweight and 23% are obese. A recent study by DCU found that one in four Irish children cannot run properly due to low rates of physical activity in their lives.

Regular cycling for everyday journeys, such as cycling to work or school helps to solve these problems. It builds regular exercise into busy lives, which can be easier to maintain compared to recreational physical activity.

The 2019 Bike Life study in Dublin found that 21% of adults who currently don't cycle, would cycle if safe cycling infrastructure was provided. Bus Connects will provide more safe cycling infrastructure.

However, nowhere in the BusConnects documentation is a full *economic* assessment of the population-level effects on health carried out. The Environmental Impact Assessment Report chapters of BusConnects planning applications, which cover human health impacts, are generalised and only say that health impacts for non-communicable diseases will be 'positive, significant and long-term'.

The full benefits of the scheme would become evident through:

- A health and economics benefits assessment using the WHO HEAT model ([HEAT for walking and cycling \(who.int\)](https://www.who.int/teams/global-action-on-air-pollution-and-climate-change/health-effects-research/health-effects-research-heat))
- A health impact assessment using guidance from Public Health Ireland at <https://www.publichealth.ie/hia>.

While we support the overall ambition of this proposed scheme in terms of sustainable transport, we feel there are too few cross-sections and several areas where designs should be improved for cycle traffic. We outline these issues in Section 5 below.

The following sections of this document deal with different aspects of the proposals:

- Section 2.0 Achieving National Mobility Policy Targets
- Section 3.0 Universal Design considerations
- Section 4.0 Welcome Design Interventions
- Section 5.0 Elements of the Scheme for Consideration

We request an Oral Hearing to discuss the issues raised.

## 2.0 Achieving National Mobility Policy Targets

The goals of the National Sustainable Mobility policy are to halve transport emissions by 2030, and add 500,000 daily active travel and public transport journeys. This will require a significant modal shift.

This modal shift will only happen with two elements:

- There is a suitable environment for people of all ages and abilities to cycle
- There is comparative advantage for active travel / public transport modes over private car traffic

The typography 'Four Types of Cyclist' by Dr Jennifer Dill, Professor Urban Studies & Planning, is useful for determining what level of suitable cycling environment is necessary to enable people to cycle. It divides people into four cohorts:

- **Strong and Fearless (4-7%):** will cycle in any conditions no matter how hostile. They will mix in all traffic types with no cycling infrastructure.
- **Enthused and Confident (5-9%):** They will mix with some traffic. They require some infrastructure. Most people who currently cycle in Dublin are in this cohort or in the 'Strong and Fearless' cohort.
- **Interested but Concerned (50-60%):** will only cycle if provided with high-quality safe and comfortable cycle routes. Will only comfortably mix with low levels of traffic in intentional low speed environments.
- **No Way, No How (25-33%):** unlikely to ever cycle no matter the conditions

The proposed scheme needs to ensure the needs of the large 'Interested but Concerned' cohort are met so as to provide the modal shift necessary to fulfil the goals of the National Sustainable Mobility Policy.

## 3.0 Universal Design

Dublin Cycling Campaign urges the NTA to ensure all works are compliant with Universal Design principles to ensure access for disabled cycling and 'non-standard' or adapted cycles, as well as access for disabled pedestrians and passengers (walking and wheeling).

As defined by the National Disability Authority (NDA) and the Centre for Excellence in Universal Design (CEUD), the [seven principles of Universal Design](#) are:

- |                             |  |
|-----------------------------|--|
| 1. Equitable Use            | 5. Tolerance for Error                 |
| 2. Flexibility in Use       | 6. Low Physical Effort                 |
| 3. Simple and Intuitive Use | 7. Size and Space for Approach and Use |
| 4. Perceptible Information  |  |

## 4.0 Welcome Design Interventions

We are supportive of a number of the modified elements of the proposed scheme as a result of submissions by ourselves and others during previous rounds of consultation. These include:

- Provision of cycling facilities along the main CBC corridor, and the East Coast Trail proposals to Seán Moore Park;
- Creating the new sustainable transport bridge across the Dodder and Grand Canal mouths;
- The major proposed public realm improvements at the new Dodder Bridge, including the new clubhouse for the rowing club.
- Construction of pedestrian boardwalk at restaurant pavilion buildings on Custom House Quay campshire.
- The relocation of both pairs of the redundant Scherzer Bridges to a more suitable location, which will facilitate the proposed sustainable transport corridor.
- Improving the Lombard St junction layout on City Quay, to make it more readable, simpler, and safer for cyclists and pedestrians.
- Routing major north-south cycle traffic through Ringsend Park, which will provide a high-amenity route, as well as a direct one;
- Formalising and widening the long-established cut-through from the toll bridge south bank to the small streets of Ringsend;
- Improved junction design at Custom House Quay/ Beresford Place/ Matt Talbot Bridge;

- The 3 pronged cycle and walking route links into the new housing development area of the Poolbeg Strategic Development Zone (SDZ) lands.

## 5.0 Elements of the Scheme for Consideration

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.

### 5.1 Cycle Track Widths

Throughout the scheme we see proposed widths of 2 way cycle tracks below the desirable minimum. As per the NTA's Cycle Design Manual, Table 2.2 (published September 2023) we would expect that the 2 way cycle tracks shown have a desired minimum 'central width' of 3 metres. This 'central width' does not include required allowances for inside and outside clearances or buffer widths, as detailed in this Table 2.2. The 'desired minimum' width has patently not been achieved in a number of locations.

We note also the lack of cross sectional details for much of the proposed 2 way cycle routes and shared routes in the Ringsend area, particularly in Ringsend Park, but also in the connection to Seán Moore Park. This is unacceptable at this final stage of planning. Further details should have been supplied to enable full assessment of the route quality.

### 5.2 Speed Limits

We welcome the proposal to introduce a 30 km/hr speed limit in this scheme. It is not clear from a legislative perspective how this will be executed given speed limit changes are currently under the remit of local authorities, and there is a national speed limit review about to be published.

### 5.3 Cycling infrastructure proposed

Sheet 02 – We acknowledge improved designs for the north side and the additional cycle track proposed for the south side towards John Rogerson Quay, but we are disappointed that the opportunity to resolve the hostile designs for active travel users on the south side of Beckett Bridge is being passed up by the applicant, and that the bus lanes are not continuous across the bridge.

Dublin Cycling Campaign warned [14 years ago](#) that the cramped space shared between cycle and pedestrian traffic would lead to conflict and collisions,

particularly on the south side. The bridge is now an extremely high-demand north-south link for cycle and pedestrian traffic with congestion at peak times, and daily conflict situations between pedestrians and people on bikes.

Retaining four lanes for motor traffic, while squeezing pedestrian and cycle traffic into a shelved, curving, cramped shared space, fails to support the goals of BusConnects to grow active travel and fails to comply with NIFTI or DMURS.

We request that the Board ask the Applicant to table redesigned proposals for the south side junction, showing adequate space allocated for active modes and compliant segregation between pedestrians and cycle traffic.

Sheet 05 - We note that designs for Tom Clarke bridge at the North Wall Quay do not align with the current proposals for that junction from Dublin City Council, which include the removal of the roundabout.

We submit that Tom Clarke bridge is extremely hostile to people on bikes, despite also being a critical link between the north and south of the city. Our members report that motorists frequently fail to follow cyclists patiently on the span itself, and frequently attempt unsafe overtaking. Footpaths along the span are of sub-standard width, making walking a bike across the bridge difficult if not unsafe.

We acknowledge the existence of the City Council Development Plan objective to provide a new parallel bridge, but in the interim we submit that, at the very least, signage to reduce motorists' speeds to 30km/h for the bridge span length, and to emphasise that overtaking of cyclists is unsafe on the span itself, should be part of the Applicant's designs. Ramps, speed tables, or other revised DMURS-compliant road designs that discourage speeding, might also usefully be considered.

Sheet 11: We note the awkward double chicane manoeuvres proposed for cyclists around the area of the Kerlogue Road/Strand Street entrance to Ringsend Park. We would like to see this section realigned to provide a smoother and more logical ride for cyclists.

#### 5.4 Linking to existing infrastructure and recent developments

There is recently-built cycling infrastructure and junctions in a number of locations which have not been reflected in the scheme drawings. This particularly relates to the tie-in to the Seán Moore Road junction, which has changed significantly in recent years.

It also relates to the proposed 'quiet road' on Pigeon House Road, where the existing bollards to prevent through vehicular traffic are not represented on the drawings, but are a critical factor in ensuring the safe status of this road for cycling and walking.

Sheet 01 – At the time of writing, the Docklands Centre building on Custom House Quay is undergoing demolition, so the cycle tracks here could presumably be widened to comply with Cycle Design Manual standards, and the pedestrian boardwalk omitted. We would suggest An Bord ask that Sheet 01 be revised accordingly.

## 6.0 Conclusion

In conclusion, Dublin Cycling Campaign supports the Ringsend to City Centre Core Bus Corridor Scheme, though requests alterations to some elements of the design:

- Removal of shared space on the south side of Beckett Bridge;
- Clarity on two-way cycle and shared 'greenway' track widths;

The Campaign requests an oral hearing on this application.

Yours sincerely,

Ellen Cullen

Chair, Dublin Cycling Campaign