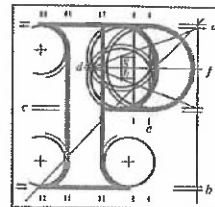


Our Case Number: ABP-314056-22



An
Bord
Pleanála

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

Date: 13 July 2023

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 recent submission in relation to the above mentioned case. The contents of your submission have been noted.

If you have any queries in relation to the 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

CH08

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



AN BORD PLEANÁLA

05 JUL 2023

Fee: € _____ Type: _____

Time: _____ By: Hand.

Dublin Cycling Campaign

% Tailor's Hall

Back Lane

Dublin 8

D08 X2A3

5th July 2023

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.

2.0 Response to 2.6.5.3 Proposed Cycling Infrastructure - Cycle Parking

Our original concern was:

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.

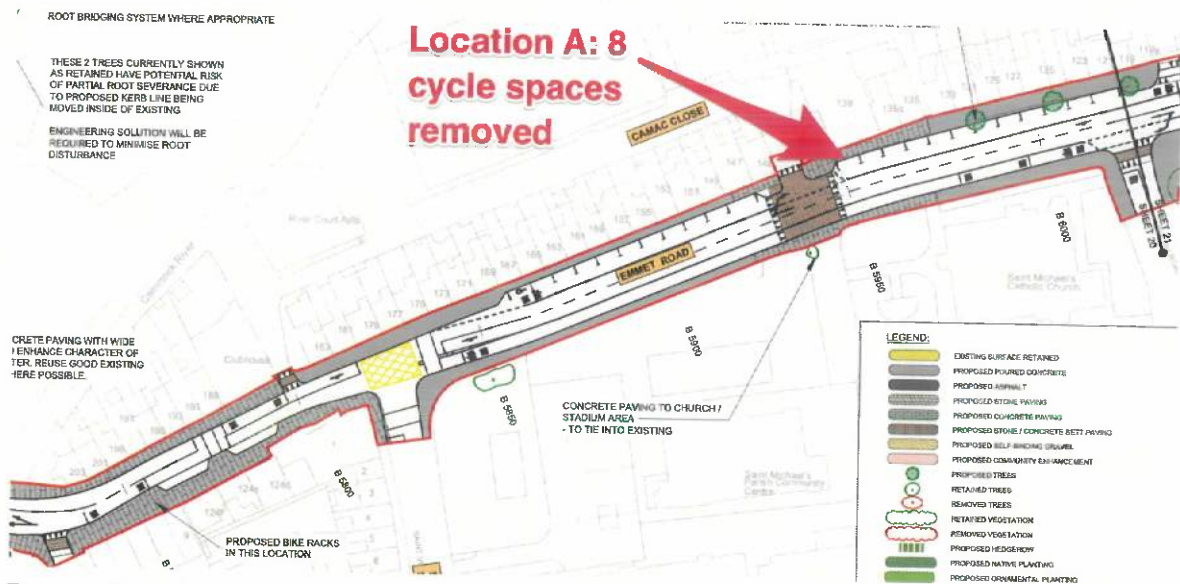
We request: that three car parking spaces along Emmet Road outside commercial areas be converted to provide adequate cycle parking.

The response from the NTA says that cycle parking will be provided with island bus stops. There are no island bus stops proposed along the length of Emmet Road as there is no dedicated cycle infrastructure.

The NTA response says:

As shown in the Landscape Arrangement drawings, new cycle parking is proposed along Emmet Road which will substantially increase the cycle parking availability in this location.

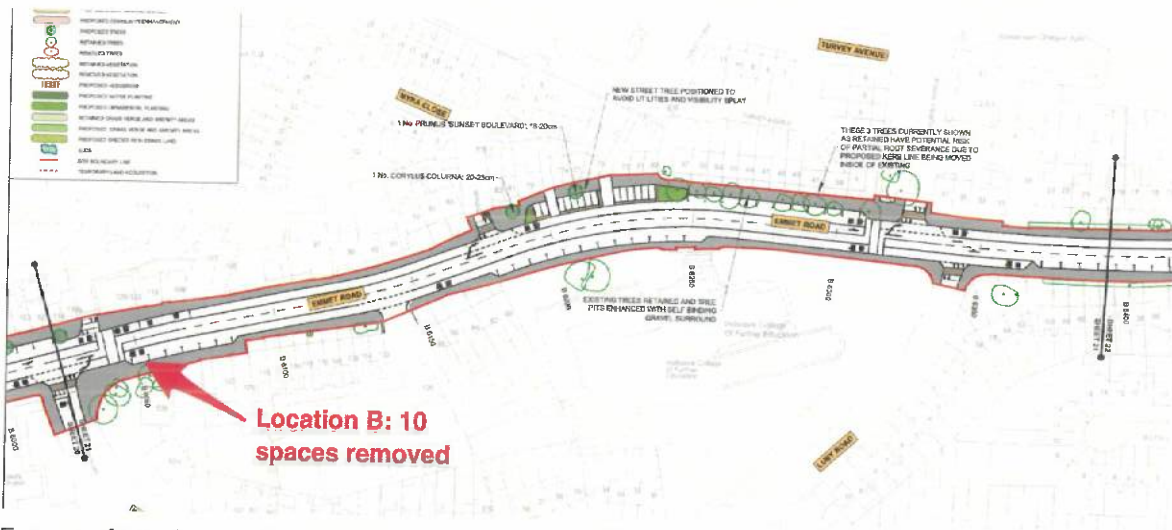
The Landscape Arrangements do not show additional bike parking along Emmet Road. In combination with what is stated in EIAR Chapter 6 page 35 cycle parking is being removed from Emmet Road. In fact it shows 28 cycle parking spots being removed without alternatives.



Extract of Landscape Arrangements Sheet 20



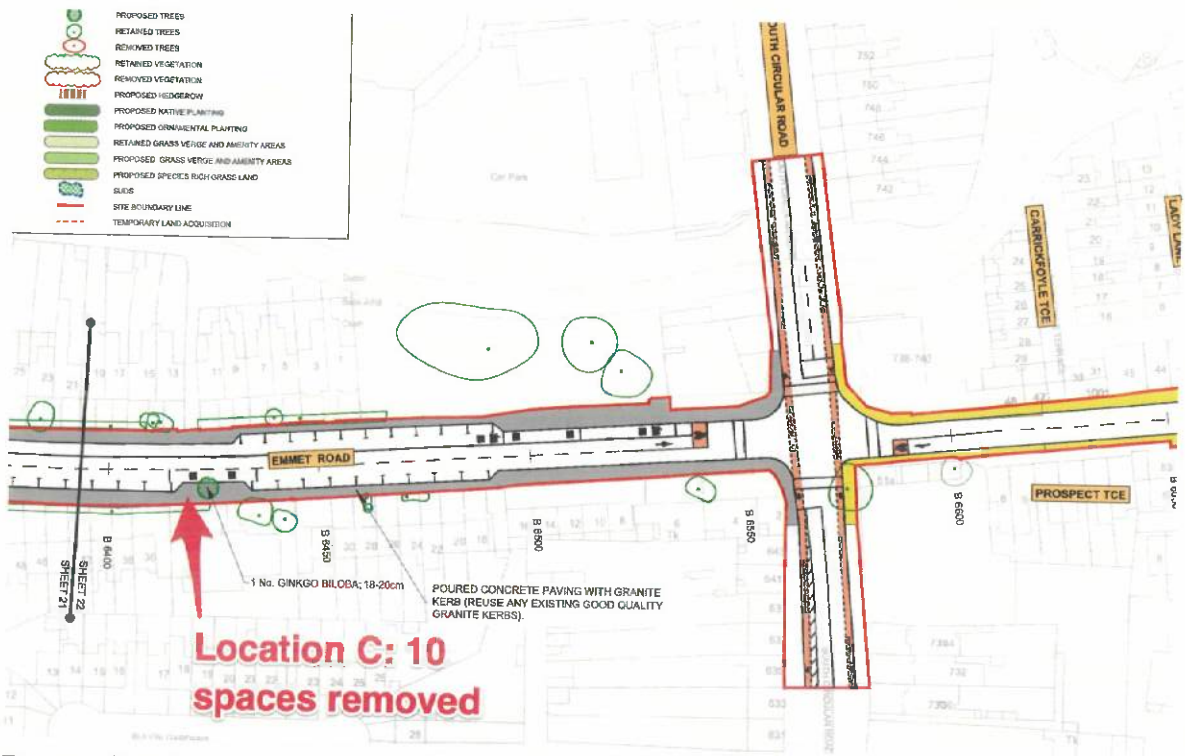
Existing cycle parking outside 139 Emmet Road / St Pat's Stadium that will be removed



Extract of Landscape Arrangements Sheet 21



Existing cycle parking outside 122 Emmet Road that will be removed



Extract of Landscape Arrangements Sheet 22



Existing cycle parking outside of the Inchicore Library that will be removed

The NTA response says:

With regards to cycle parking, 417 spaces are currently provided. The Proposed Scheme will increase provision by 148% to a total of 1017 spaces across the entire corridor.

Increases in cycle parking on other sections of the corridor do not make up for removal of cycle parking along the length of Emmet Road outside shops and local amenities. The NTA's response is frankly misleading.

Our request for cycle parking to be retained on Emmet Road by converting 2 or 3 of the proposed 93 car parking spots (EIAR Chapter 6 pg 78) is not unreasonable.

Our request aligns with national and local policy to promote active travel. Cycle parking is a key element of that. The Dublin City Development Plan (section 16.39) guidance aims for cycle parking within 50m of local amenities. The NTA's National Cycle Manual cycle parking guidance states that cycle parking should be near locations including shops.

2.0 Response to 2.6.5.3 Proposed Cycling Infrastructure - Cycle Track Widths

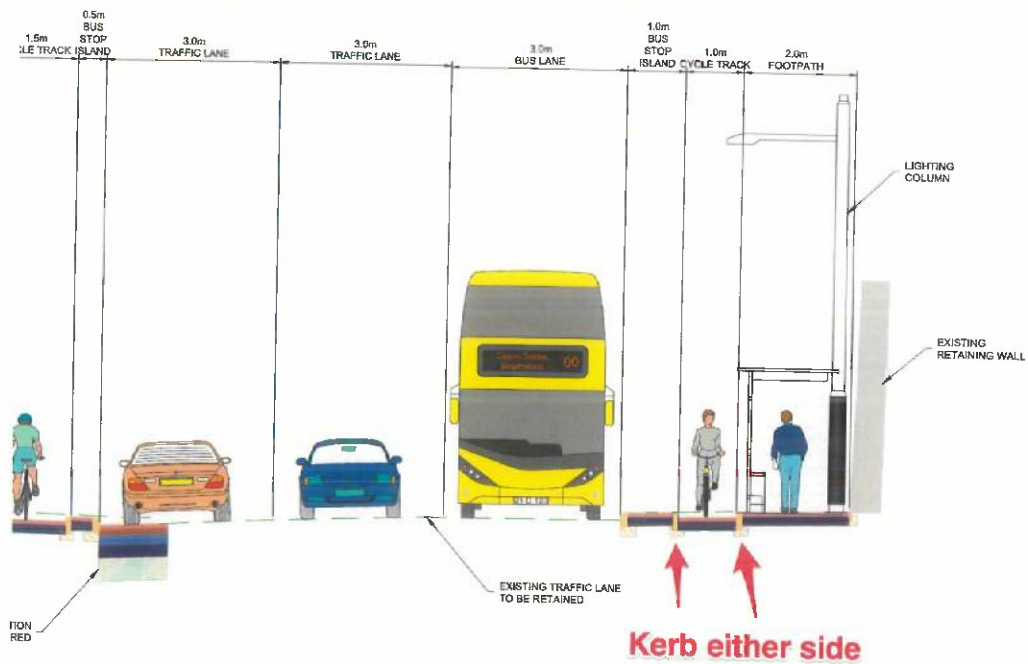
The NTA response:

One of the main outcomes of the Proposed Scheme is safe, segregated cycling facilities which are accessible to all along the corridor. As set out in the PDGB and in accordance with the NCM width calculator, the desirable minimum width for a single-direction, with-flow, raised adjacent cycle track is 2.0m, to provide a high Quality of Service and allow for overtaking within the cycle track, as well as to cater for larger cycles. Notwithstanding this aspiration, it is acknowledged that the Proposed Scheme is to be delivered in constrained urban environments, and the delivery of a 2.0m+ wide cycle track may not always be practicable. As such, the cycle track widths have been reduced to typically 1.8m or 1.5m wide where the provision of 2.0m wide cycle tracks is not practicable.

Whilst cycles can come in a range of shapes and sizes (for example standard, tandem, recumbent, cargo, handcycle, wheelchair user tricycle, articulated bikes

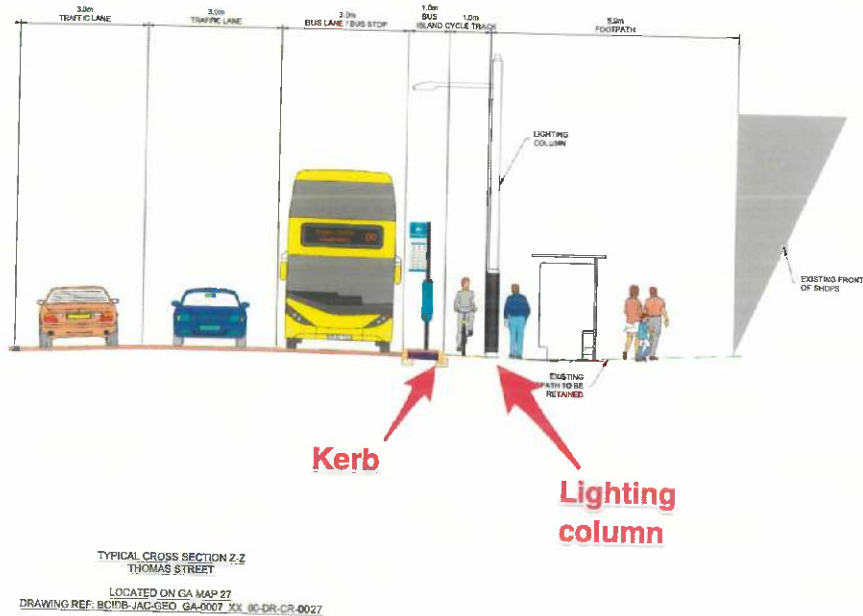
with additional child trailer or trailer bikes), these cycles are typically less than 1m in width and will be accommodated by the Proposed Scheme.

Again the NTA response misleads. While we acknowledge that the desired width isn't always possible, there are locations where the cycle track is well below 1.5m and with kerbs/lighting columns at the cycle track edge further constraining the effective width. Below are two examples of 1m cycle tracks that are constrained on both sides.



TYPICAL CROSS SECTION O-O
BALLYFERMOT ROAD

LOCATED ON GA MAP 16
DRAWING REF: BCIDB-JAC-GEO_GA-0007_XX_00-DR-CR-0016



These narrow cycle tracks of 1m with vertical constraints on either side will be inaccessible to some types of cycles. Many cargo bikes are 70cm wide and tricycle cargo bikes are 85cm wide. This includes cargo bikes that are part of the Dublin City Council / Bleeper Bike cargo bike trial.



These tricycle cargo bikes have a wheel width of 85cm. The National Cycle Manual states a “wobble room” of 250mm (section 1.5) to account for the kinetic envelope of the cycle. Guidance for disabled cyclists charity Wheels for Wellbeing states a minimum cycle track width of 1.5m¹. The UK’s cycle design manual states an absolute minimum width of 1.5m with more needed when there are adjacent vertical elements like street poles.²

In Cross-Section Z-Z above the cycle track is 1m beside a 5.9m footpath. A small narrowing of the footpath would ensure the cycle track would accommodate all types of cycles. Otherwise there is a high likelihood of disabled cyclists or cargo bike users getting stuck in a narrow cycle track.

Our concerns are not unfounded. The request is reasonable and can be accommodated via condition if the inspector agrees.

4.0 Conclusion

Our two requests are simple and straightforward.

- With the aim of encouraging more cycling to local amenities replace two or three of the 92 car parking spots on Emmet Road to replace the 28 cycle parking spots that are being removed without replacement
- To ensure that disabled cyclists are not discriminated against and to support the growth of cargo bikes for parents carrying kids and business moving cargo. Ensure a minimum cycle track width of 1.5m when there is a kerb or lighting pole adjacent to the cycle track. Otherwise ensure there is the potential for wide cycles to overrun the footpath area by removing any kerbs

Kevin Baker
Infrastructure Group
Dublin Cycling Campaign

¹ https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951074/cycle-infrastructure-design-ltn-1-20.pdf#page=42