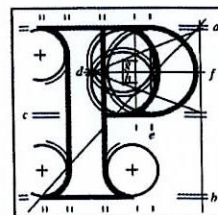


Our Case Number: ABP-313892-22



An
Bord
Pleanála

Dublin Cycling Campaign
c/o Joan O'Connell
Tailor's Hall
Back Lane
D08 X2A3

Date: 21 July 2023

Re: Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter 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,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

AA02

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Lálthreán 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



Dublin Cycling Campaign

% Tailor's Hall

Back Lane

Dublin 8

D08 X2A3

12th July 2023

AN BORD PLEANÁLA

LDG- _____

ABP- _____

12 JUL 2023

Fee: € _____ Type: _____

Time: 13:33 By: Handi

Blanchardstown to City Centre Core Bus Corridor Response (Case: 313892)

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 Blanchardstown is a Town Centre

Section 5.0 of our original submission raised a number of concerns with the NTA's proposed road and public space design for not complying with local, regional and national policy on the design of town centres.

Our submission quoted a number of policies including the National Planning Framework, National Sustainable Mobility Policy, Places for People - National Policy on Architecture (2022), Town Centres First, DMURS, Traffic Management Guidelines and the Draft Fingal Development Plan (2023-2029).

The NTA's response (section 2.9.5.6) defends their design by re-stating their original EIAR analysis effects as they have analysed them to be. In our original submission we raised serious concerns about how the criteria that the NTA has used for assessing the effects picks and choosing criteria for pedestrians and cyclists to fit their narrative. Just because the NTA's analysis says that there are positive and significant long-term effects doesn't mean that the NTA proposals are in alignment with local, regional and national policy. It just means that their proposals are better than the extremely low quality walking and cycling infrastructure that exists in Blanchardstown today.

2.1 Flawed Analysis of EIAR Effects

We believe that the EIAR effects analysis for cycling infrastructure overstates the benefits of the scheme. As a result it will not deliver the modal shift and the resulting human and environmental benefits stated in the EIAR.

2.1.1 Criteria Chosen

The assessment for cycling is 'Positive, Significant and Long-term' effect in the EIAR. Criteria chosen by the NTA for the EIAR were segregation, width and junction treatment. The NTA's own National Cycle Manual (NCM) already has outlined criteria for assessing the level of service provided by various types of cycling infrastructure. They are pavement quality, number of adjacent cyclists (width), number of conflicts per 100m, journey time delay and HGV influence.

Quality of Service	Pavement condition (PCI range)	Number of adjacent cyclists	Number of conflicts per 100m of route	Journey time delay (% of total travel time)	HGV influence (% of total traffic volume)
Level A+	86 – 100	2 + 1	0 – 1	0 – 5%	0-1%
Level A	66 – 85	1 + 1	0 – 1	6 – 10%	0-1%
Level B	51 – 65	1 + 1	1 – 3	11 – 25%	2 – 5%
Level C	41 – 50	1 + 0	4 – 10	26 – 50%	6 – 10%
Level D	20 – 40	1 + 0	>10	>50%	>10%

Extract of page 10 of the NTA's National Cycle Manual

The NTA has cherry picked two of the five the criteria the proposed design scores well on (width, segregation) and has ignored other major criteria like number of conflicts per 100m and journey time delay.

2.1.2 Shared Spaces

The NTA scheme around Blanchardstown uses a large amount of shared spaces for pedestrians and cyclists. The NTA's NCM states:

Urban design of town and city centres should aim for the optimum pedestrian Quality of Service consistent with the overall traffic plan. Shared facilities between pedestrians and cyclists generally result in reduced Quality of Service for both modes and should not be considered as a first option.

The NTA's response says:

For signalised junctions, there are a mix of toucan crossings provided (LoS A)

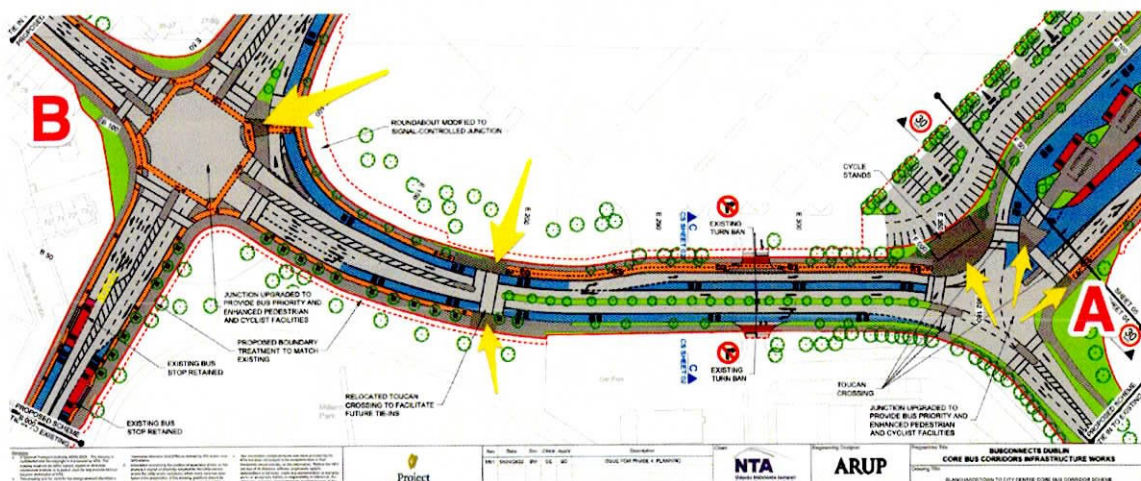
The NTA is stating that toucan crossings are level of service A. Toucan crossings are crossings shared by pedestrians and cyclists with full mixing occurring. The NTA's

manual says "shared pedestrian cyclists infrastructure should be avoided in town centres". Shared infrastructure is also a conflict described in the NTA cycle manual quality of service. This criteria that was omitted from the NTA's EIAR analysis.

The NTA is overstating the quality of the infrastructure they are delivering by not analysing the amount of shared space being forced on pedestrians and cyclists in a town centre.

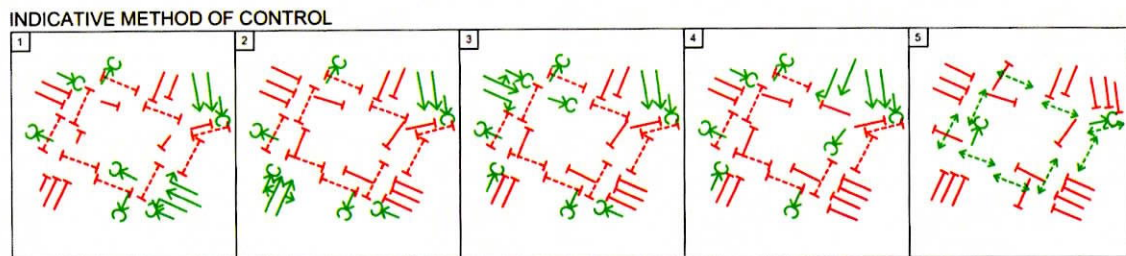
2.1.3 Junction Delays

Another criteria that is standard in the NCM that was ignored by the NTA was journey time delay. Let's take an example.



Extract of sheet 04 of the General Arrangements

A cyclist travelling from point A to point B a distance of about 400m would travel through three shared toucan crossings, multiple shared spaces with pedestrians and pass through three junctions. The junction on the left 'Blanchardstown Road South / Blakestown Way' has a 5 phase traffic light system with cyclists able to move from Location A to B in light phase 1.



Extract of Volume 3 Chapter 4 10 Junction System Design

Report Appendix A6.3 Junction Design Report shows traffic light cycle time is 120 seconds for this junction. The junction design report doesn't analyze the cycle traffic delay duration. Only the delay duration for cars and buses.

The Traffic Signs Manual (section 10.2, pg 149) states:

Cycle times in excess of 120 seconds are not recommended as drivers and pedestrians can get frustrated with delays and can be tempted to take risks. Shorter cycle times (90 seconds or less) should be provided in urban areas in order to minimise delays to pedestrians, cyclists and vehicles.

The NTA has produced large junctions with long cycle times that create large delays for people walking and cycling. This directly affects the quality of service of the offered cycle route. This was ignored as a criteria by the NTA's EIAR effects analysis.

Fingal County Council raised the same issues in their submission. From responses (section 2.9.6.6, pg 252):

The junction of Blanchardstown Road South and Blakestown Way contains a number of multi-stage pedestrian crossings routed across a number of cycle, bus and traffic lanes. A tighter junction arrangement, more consistent with the principles of DMURS, may be appropriate here, as in the absence of suitable signal timings at this location to prioritise the more sustainable modes such as walking and cycling, there may be significant crossing and wait times for pedestrians and cyclists.

The response from the NTA to FCC:

The general arrangement of this junction needs to balance the management of traffic at this busy suburban junction adjacent to the shopping centre with provision of safe crossing facilities for pedestrians and cyclists, and the need to provide buses with reliable journey times to and from the bus interchange. To meet these needs and due to the multi-lane nature of the approach roads staggered crossings will be utilised at this location.

[...] A left turn filter traffic lane from Blanchardstown Road South towards the shopping centre has been provided to facilitate the movement of traffic towards the shopping car parks.

The NTA is incorrectly stating this is a suburban environment. It is not. Blanchardstown is an urban centre. Fingal County Development Plan (FCDP) 2023-2028 zones the Blanchardstown core where these roads are located as "MC

Major Town Centre". Blanchardstown is designated as a Level 2 'Major Town Centre' in the Retail Strategy for the Greater Dublin Area. It is policy CSP20 of FCDP to:

Consolidate the growth of Blanchardstown as set out in the Settlement Strategy for RSES by encouraging infill and brownfield development and compact growth rather than greenfield development and by intensification at appropriately identified locations.

The transport infrastructure being proposed by the NTA is to replace roundabouts with large-scale multi lane junctions with long wait times for pedestrians and cyclists at the core of a major town centre. This is completely against the local, regional and national policy as highlighted in our original submission.

2.1.4 Footpath Widths

Our original submission noted that section 4.3.1 of DMURS states that the minimum footpath width is 1.8m and that in densely populated areas and busier streets, additional width must be provided to allow people to pass each other in larger groups, including up to 4m in areas of high pedestrian activity such as town centres.

The footpaths on Blanchardstown Road South are 2m (Cross-section C-C). Just to the north of this road An Bord Pleanála approved 971 apartments at the junction of Blanchardstown Road South / Blakestown Way in May 2023 (case 315709). As this and other sites in the Blanchardstown Town Centre change to mixed use the volume of people walking and cycling will increase dramatically. The infrastructure proposed by the NTA doesn't match that either the existing designation as a major town centre or the growing number of people who will be walking in this area in the near future.

2.2 Conclusion of Blanchardstown is a Town Centre

The NTA's response doesn't address the core concerns in our initial submission.

The NTA is misapplying transport and public space design policy in the Blanchardstown town centre area by misunderstanding the context of the area they are designing for. Designing public spaces and transport infrastructure for different contexts is the key part of the policies like DMURS, Traffic Management Guidelines, NPF and National Sustainable Mobility Policy.

The board can alter the proposed roads to be streets more suitable for a town centre or reject the proposals around Blanchardstown Town Centre until the NTA can produce designs that comply with policy.

3.0 Widening the N3

In section 6.2 of our original submission we raised concerns that the proposal to add an additional lane to the N3 as part of this scheme didn't align with The National Sustainable Mobility Policy's objectives to reduce fossil fuel vehicle kilometres by 10%.

Response 2.9.5.7 states:

"The Proposed Scheme will provide bus lanes on the N3 corridor in both directions which will require the widening of the BR01 River Tolka Bridge beneath the N3 off-slip and also BR02 Mill Road Bridge."

The three existing traffic lanes in each direction will be retained, however the Proposed Scheme does not include for an additional traffic lane in each direction, as shown in Figure 2.9.37 below.

For an avoidance of doubt there are three lanes on the N3 where it crosses Mill Road and with this proposal there are 4 lanes. Do-nothing it is 3 general traffic lanes with no bus infrastructure and do-something it is 3 general traffic lanes plus 1 bus lane. There is one more lane in the do-something scenario. Taking buses out of the existing 3 lane scenario and moving them into a new fourth lane frees up existing road capacity for private motor traffic.

The NTA's response doesn't address any of the issues we raised around whether the proposal to widen the N3 complies with the National Sustainable Mobility Policy.

The widening will be done by removing the green median and widening into the road sides including lengthening culverts and removing green space.

The NTA has never considered the alternative of reallocating existing road space to provide the necessary bus lane for bus priority instead of widening the road to provide the bus lane.

Reallocating existing road space as an alternative would:

- Reduce general motor traffic capacity and emissions
- Reduce noise
- Reduce air pollution
- Remove the need for widening the Tolka Culvert by 2m
- Reduce the impact on the Riparian Corridor of the Tolka River near Mill Road as the pedestrian ramps could be provided within existing urban footprint

The NTA has not considered this alternative and importantly has not responded to the concerns we raised in our last submission.

We request that the board omit the widening of the N3 from the Snugborough Junction to the M50 junction from any grant of planning permission as the NTA has not provided the necessary information to justify the road widening programme they are proposing.

4.0 Castleknock Manor

Response 2.9.5.8 is in response to our concern that Castleknock Manor isn't being actively designed to be a low speed environment. We have no objection to "Quiet Streets" proposed by the NTA.

The NTA response states: "*Castleknock Manor leads to a residential area and is a cul-de-sac, thus will not be subject to through-traffic.*"

The road hasn't been actively designed to be slow and safe as required by DMURS and the National Cycle Manual.

1. The road width varies from 6m to 7.3m (cross-section N-N). DMURS says max of 5.5m and NCM states (page 54) 5.5m for 'Narrow Shared Street'
2. The road is nearly perfectly straight for 465m. DMURS recommends against long straight sections as they encourage speed. DMURS pg 114 section 4.4.7 states:
 - *Raised tables, or platforms, may be placed strategically throughout a network to promote lower design speeds, slow turning vehicles at junctions and enable pedestrians to cross the street at grade. Key locations where these should be considered include:*
 - *On longer straights where there is more than 70m between junctions. [...]*
3. There are large corner radii on Peck's Lane of 17-20m that are far above 1-3m corner radii expected on local streets. The corner radii are currently suitable for large volumes of HGVs rather than a "Quiet Cycling Street"
4. This road is the access to the community facilities of GNS Fitness/St. Brigid's GAA Club where there are 143 car parking spaces.



Extract of Sheet 16 General Arrangement

Castleknock Manor is fully within the red line boundary of this application. The board can, via condition, require alterations to the existing road in order to improve road safety for pedestrians and cyclists inline with DMURS.

5.0 Cabra – Cycling connections

Section 6.8 of our original submission was concerned that the BusConnects junction at Cabra Cross didn't leave the option for future cycle routes to connect into this transport corridor. The NTA response said (2.9.5.10):

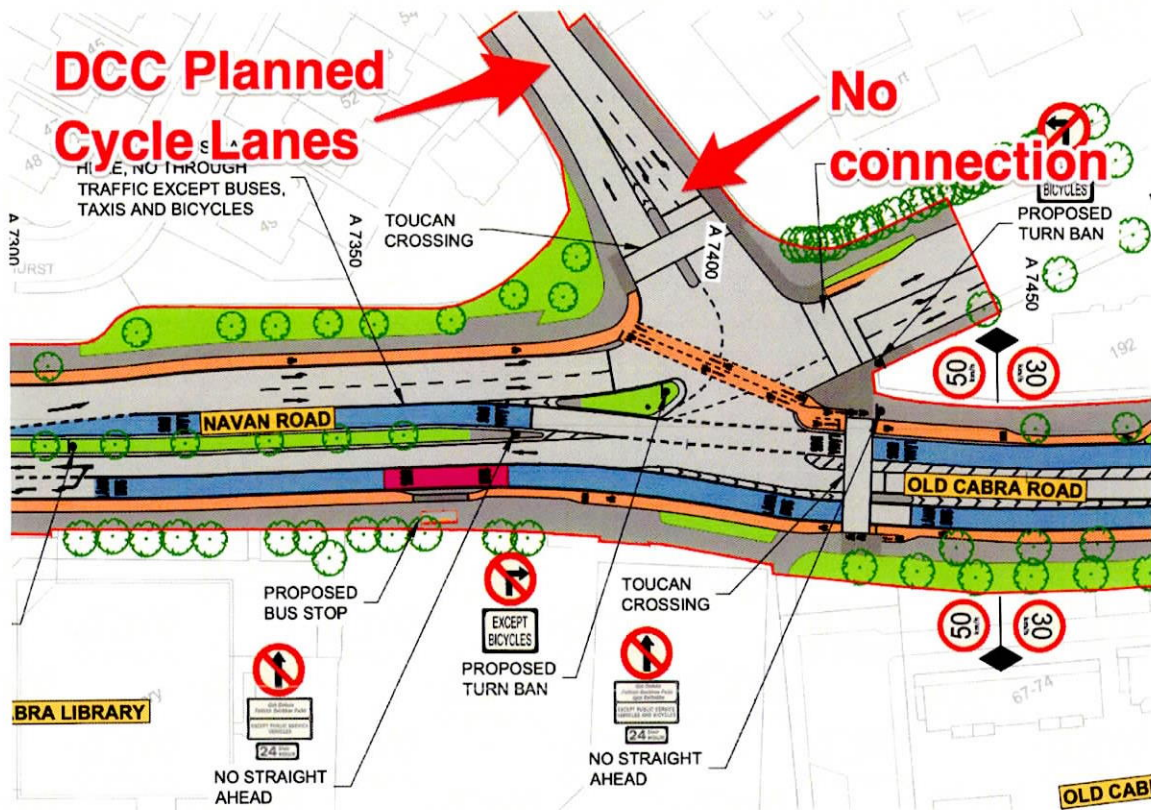
While it would also be desirable to improve all surrounding areas, the Proposed Scheme has focussed on improving facilities along the corridor, based on the scheme objectives. It is likely that future schemes, brought forward either by the relevant Local Authority or the NTA, will address these connections and the Proposed Scheme allows for this to happen at a future date.

The submission was not calling for cycle lanes on the length of these roads, merely that the junction being built as part of BusConnects doesn't need to be rebuilt again to connect up with cycle lanes planned by others.

At the Cabra Cross junction Dublin City Council has already proposed cycle lanes on Cabra Road as part of the 'Ratoath Road Walking and Cycling Scheme'¹, which is secondary route 4B in the NTA's Greater Dublin Area Cycle Network Plan. The

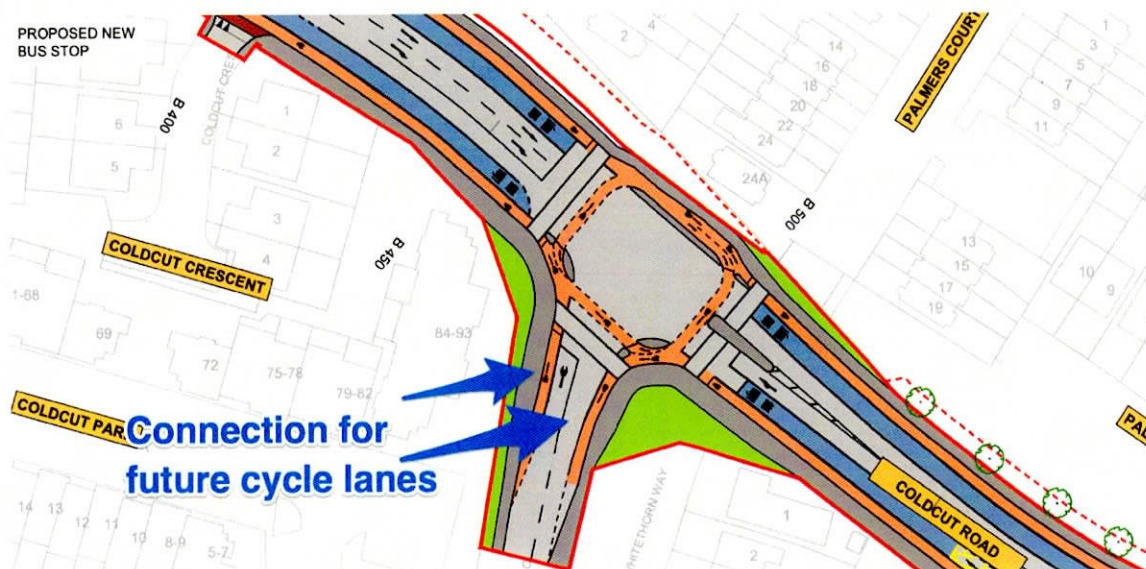
¹ <https://consultation.dublincity.ie/traffic-and-transport/ratoath-road/>

BusConnects junction design doesn't leave space for the DCC proposal to connect into this Core Bus Corridor without re-aligning the Cabra Road junction again.



Extract of Sheet 28 General Arrangements

In comparison below is an example from Core Bus Corridor 7: Liffey Valley showing how an upgraded junction is leaving cycle lane stubs on an adjacent road to allow for easy integration with future cycling routes without rebuilding this junction again.



Extract of Sheet 06 General Arrangement of the Liffey Valley Core Bus Corridor

The junction design proposed by the NTA for Cabra Cross doesn't take into account actively planned cycle lanes. This will leave critical gaps in the cycling network at junctions.

Our request is that the Cabra Cross junction be changed to support integration with actively planned cycle projects outside the scope of this project. The junction is within the red line boundary of this application. It is well within the power of the board to alter the design of this junction (and others) via condition.

6.0 Banning Cycling from N3/M50 junction

Both Fingal County Council (response 2.9.6.5, pg 251) and Transport Infrastructure Ireland (TII) (response 2.9.8.4, pg 265) both raised concerns over use of the N3/M50 Junction Bus lanes by cyclists. This would be inappropriate given the volumes and speeds of vehicles.

The response from the NTA mentions alternative cycling routes, including the Royal Canal Greenway. The response incorrectly states that:

Fingal County Council's website notes that the Royal Canal Greenway is to be submitted for Planning Approval in 2023.

The section of the Royal Canal Greenway that passes over the M50 has already been completed. It opened in June 2014 between Ashtown and 12th Lock/Castleknock train station. The cycling route marked 4A on the GDA Cycle Network Plan linking the two sections of the Old Navan Road cut by the M50 already exists. The Tolka Valley Greenway to the north of the junction hasn't been completed and currently has no currently active plan.

Two of the three planned cycle routes in the area are open to cyclists. As a result the Dublin Cycling Campaign wouldn't be against banning cycling on the N3/M50 between chainage A2250 - A2850 (Auburn Road / Navan Road junction) using road sign RUS 055.

This in combination with good wayfinding towards the alternative cycling routes in the area would reduce the risk of cyclists ending up in an inappropriate location.

7.0 Conclusion

We do not feel that the NTA's responses have responded to many of the issues we have raised in our previous submission.

After reading the responses from the NTA we request the board to:

1. Alter via condition or omit the proposed sections around Blanchardstown Town Centre as the proposals do not align with local and national policy on designing town centres to be people first
2. Omit via condition the proposed road widening of the N3 as the alternative to reallocate existing road space was not considered
3. Alter via condition the proposals for Castleknock Manor to ensure slower traffic speeds suitable for a "Quiet Cycling Street", reduce traffic hazard and comply with DMURS
4. Alter via condition the Cabra Cross junction to support integration with planned future cycle routes
5. Consider banning cycling from the N3/M50 junction in combination with wayfinding signs for cyclists to use the existing alternative routes of Old Navan Road (Secondary Route 4A) and the Royal Canal Greenway