



Dublin Commuter Coalition
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ABP case ref: 313892

BUSCONNECTS BLANCHARDSTOWN CORE BUS CORRIDOR SCHEME

Introduction

Dublin Commuter Coalition was established in 2018 as a voluntary advocacy group for public transport users, cyclists, and pedestrians in Dublin and surrounding counties. The Coalition acts as a unifying voice for commuters in these areas so that they may express their concerns, their hopes, and their vision of a Dublin that works for all users of sustainable transport.

We support the BusConnects Core Bus Corridors project, and we are glad to see the more than three years of public engagement finally result in a planning application. We believe this project has the potential to be a catalyst for greater usage of public transport and active travel along the route. However, the proposed design requires significant changes for this to happen and we are requesting an oral hearing to discuss changes.

We divide this submission into two parts. In the first part we make some general observations. In the second part we make comments on the details of the proposed scheme.

I - GENERAL OBSERVATIONS

Enforcement

There are bus and cycle lanes, bus gates, bus priority lights, and turn bans for vehicular traffic except buses proposed in this scheme. The success of these measures relies entirely on the legal usage of roads by drivers. Existing bus lanes, bus priority lights, bus gates, and turn bans are abused every day in Dublin due to the near-zero level of enforcement. However, there is no provision for enforcement cameras proposed as part of this project. Without a plan for camera enforcement, the effects of the improvements proposed in this scheme will not be seen by bus users.

General comments on junction design

The primary junction design proposed by the National Transport Authority, the 'Dublin-style' junction (Figure 1), was designed by the NTA and does not follow international best practice in junction design.

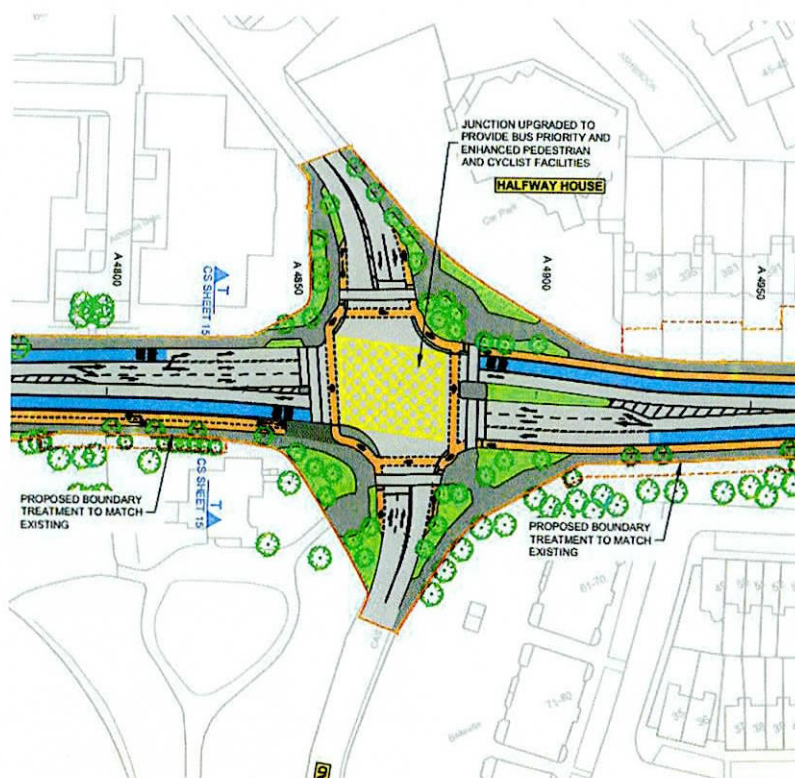


Figure 1 NTA's 'Dublin-style' junction at the Halfway House

When compared to the proven Dutch junction, the NTA's design poses a great risk of left-turning drivers crashing into cyclists and has larger crossing distances for pedestrians. The few existing examples of this NTA design in Dublin have been widely regarded as unsafe.

For example, the junction at Lombard St and Townsend Street was redesigned as a "Dublin-style" junction. This was quickly found to be unsafe, and the junction has gone through a few design iterations since. This has presumably cost the taxpayer a lot of money, which could have been avoided if the initial design had not been so poor. It is worth noting that Lombard St and Townsend Street are relatively low traffic narrow streets, where cars move at a relatively slow speed, so the possibility of fatal accidents is reduced. This is not the case with many of the junctions in this scheme, where cars and cyclists are likely to come into conflict with cars travelling at high speeds.

Two critical differences between a 'Dublin-style' junction and a Dutch-style junction (Figure 2) are that in a 'Dutch-style' junction (i) the waiting point for pedestrians is between the cycle track and the carriageway and (ii) the waiting point for cyclists going straight is substantially ahead of the waiting point of motorists who may be turning left.

We request that the NTA use Dutch-style junctions (Figure 2) throughout the project.

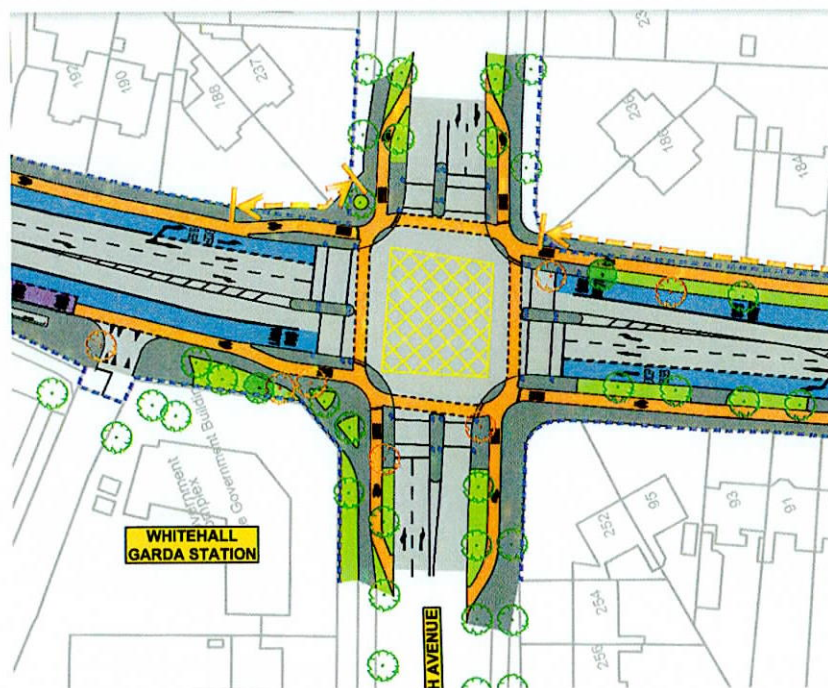


Figure 2 Dutch-style junction at Swords Road/Griffith Avenue from the second public consultation

Additionally, there are several junctions that do not align with the instruction of DMURS to minimise the radii of corners for pedestrian safety. We would ask that the applicant be asked to reduce these corner radii.

Pedestrian crossings

There are dozens of examples of two-stage pedestrian crossings proposed as part of this scheme. These crossings drastically increase the time required for pedestrians to navigate junctions and crossings and are inconsistent with the DMURS requirement to consider pedestrians first when designing urban roads.

Furthermore, some junctions are missing pedestrian crossings entirely on one or more sides. These missing crossings mean a pedestrian may need to wait for three lights — or more in the case of two-stage crossings — just to cross the street and continue their journey.

Shared space

The project proposes having shared space for pedestrians and cyclists at several junctions. This arrangement is entirely unsuitable for busy urban junctions. We insist that pedestrians and cyclists be segregated at all junctions for the safety and comfort of all.

Bus stop design

A major concern throughout the plans is the width of the bus stop islands that are proposed — particularly south of the Halfway House. Bus stop islands are crucial for the safety of cyclists and for encouraging all ages and abilities to use cycling infrastructure. However, such narrow islands place cyclists in direct conflict with boarding and alighting bus passengers. We ask that all bus stops include adequately wide islands to avoid unnecessary conflict points between passengers and cyclists.

II - PROPOSED SCHEME DETAILS

In this submission we address the Blanchardstown to City Centre Core Bus Corridor Scheme in three parts. First, we look at north of the M50 roundabout (i.e. from the Blanchardstown Shopping Centre to the M50 roundabout). This covers sheets 1-13. Second, we look at the Navan Road between the M50 roundabout and the junction with Cabra Road. This covers sheets 14-27. Finally, we look at south of the junction between Navan Road and Cabra Road. This covers sheets 28-40. We think the first part is extremely inadequate. The second part needs improvement. While the third part has some issues that we have concerns about.

All references to drawings refer to sheet numbers in Appendix A - General Arrangement Drawings of the planning application.

PART 1 OF PROPOSED SCHEME - NORTH OF THE M50 ROUNDABOUT

Of the three parts of this proposed scheme, the part north of the M50 (sheets 1-14) is the most problematic and need serious improvement. This part in turn is comprised of two basic elements: from the Snugborough junction to the M50 and Blanchardstown Shopping Centre.

Junction design

Snugborough junction to the M50.

The bus lanes and bus stops appear to be of a high quality. The road appears to be effectively a motorway. However, there is essentially no provision in this scheme for any cycling or pedestrian infrastructure between Snugborough Junction (Sheets 7/8) and Auburn Ave (sheet 14). We understand that the upgrade of Snugborough Junction is part of a separate scheme, and that off road cycling provision is planned. Nevertheless, the fact that for a substantial part of this plan there is no walking or cycling infrastructure provided at all, despite "the aim of the Proposed Scheme [being] to provide improved walking, cycling and bus infrastructure", suggests that either the aim will not be met by the proposed plan or that this is not actually the aim at all.

Blanchardstown Shopping Centre.

The section around the Blanchardstown Shopping Centre is located in a relatively small space between the Blanchardstown Road and the Snugborough Road. This section of this core bus corridor scheme is the worst element of any BusConnects proposal the Dublin Commuter Coalition has seen so far. The walking, cycling, and bus infrastructure in this part of the scheme is quite poor and at times non-existent.

Junction at Blanchardstown Road and Old Navan Road

The proposed junction at Blanchardstown Road and Old Navan Road (Sheet 1) is a significant improvement from what currently exists, but it needs significant improvement.

There are no major space restrictions at this junction so the fact it is so poor is disappointing.

In order to improve it and bring it in line with international best practice, the following changes should be made.

Firstly, two stage pedestrian crossings should be avoided. This can be achieved by installing pedestrian islands between the cycle lanes and the main carriage way. These would be at points A in Figure 3 below. This would somewhat reduce the distance for pedestrians to cross. If necessary, removing the pedestrian islands can further reduce the distance needed for pedestrians to cross and might allow the removal of these two stage crossings.

Further, there is no pedestrian crossing between the two B points in Figure 3. This missing crossing requires pedestrians to use the three other pedestrian crossings to legally cross here, and given these are two-stage crossings, that means a pedestrian may need to wait for six traffic light changes just to cross the street and continue their journey.

A pedestrian crossing should be installed at this junction. And appropriate pedestrian islands between the cycle lanes and the main carriage way should be installed.

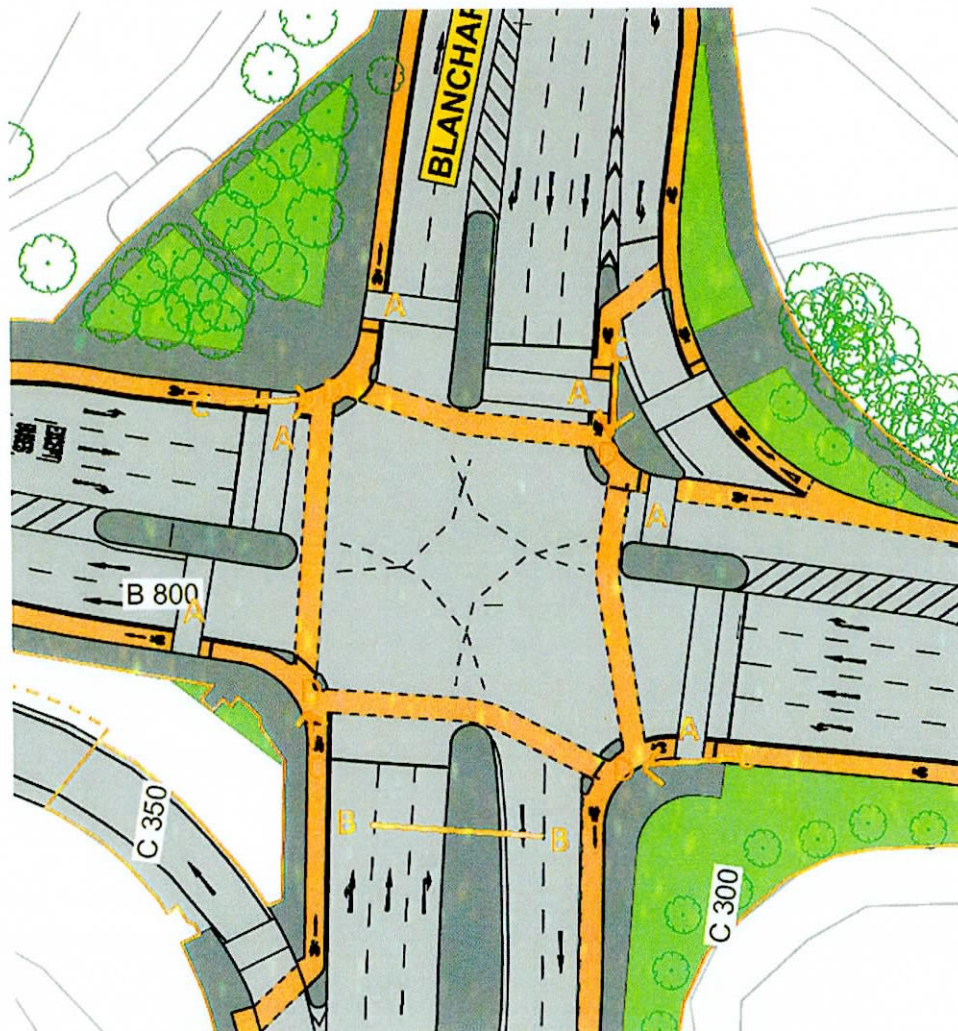


Figure 3: Junction at Blanchardstown Road and Old Navan Road

Currently cyclist starting points are beside motorist starting points. This ensures dangerous conflicts between cyclists going straight and motorists turning left.

Figure 4 below focuses on the top left corner of Figure 3 above. A cyclist moving forward at this junction will move from W to X. At the same time a motorist moving from Y to Z will not see or anticipate the cyclist moving to X. A motorist is likely to be travelling at speed by the time they reach Z. This conflict between motorists and cyclists is highly dangerous. It is likely to lead to collisions. And given the high fatality rate in motorist/cyclist collisions, it is possible it will lead to cyclist fatalities.

From reading the BusConnects designs, it is our understanding that that the planned traffic light signalling for intersections such as this will involve the light turning green simultaneously for cyclists and pedestrians. This is one of the features of the "Dublin-style" intersection that has been widely criticised and has already been mentioned above.



Figure 4: Junction at Blanchardstown Road and Old Navan Road – Traffic Flow

In order to avoid these conflicts, the waiting point for cyclists going straight should be substantially ahead of the waiting point of motorists who may be turning left. In Figure 3 above, this would involve moving the cyclist waiting point from points C to points D. This would result in cyclists going straight being visible to motorists turning left and would allow motorists time to react and turn left with the caution needed.

Additionally, appropriate changes should be made to traffic light signalling for both cars and cyclists to ensure the junction is safe. (For example, this might involve an early green light for cyclists and a flashing amber light for motorists turning left.)

These changes are necessary at many junctions in the various core bus corridor plans and are mentioned below.

Below this junction, the Blanchardstown Road crosses the N3 with a bridge. On this bridge, these planning proposals have three lanes of traffic in each direction. But it only provides an extremely narrow cycle lane, with "light segregation" (i.e. armadillos). (See Figure 5.) A safe and sufficiently wide and properly segregated cycle lane should be provided.

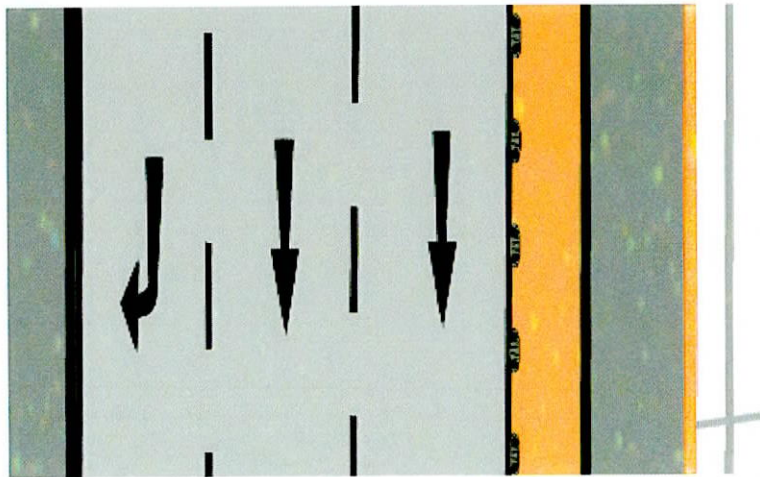


Figure 5: Junction at Blanchardstown Road and Old Navan Road – Bridge over N3

Junction at Blanchardstown Road and Navan Road (N3) slip road

The junction at Blanchardstown Road and Navan Road (N3) slip road (Sheet 3) is very poor and the cycle crossing are complicated and unnatural. (See Figure 6 below.) And there is an excessive amount of shared cyclist/pedestrian space.

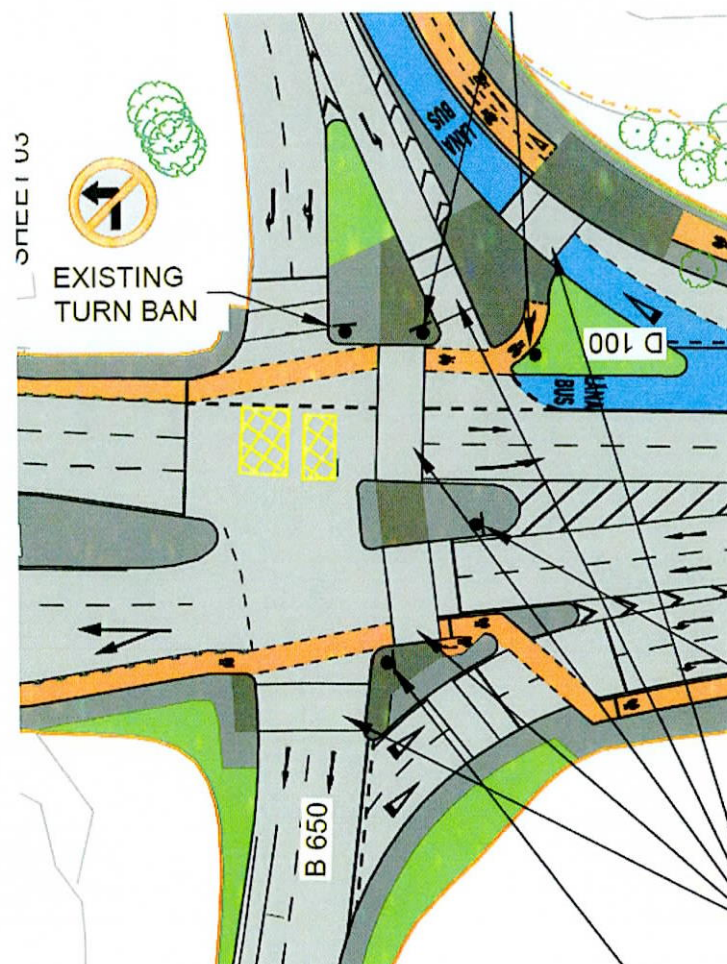


Figure 6: Junction at Blanchardstown Road and Navan Road (N3) slip road

Junction at Blanchardstown Road and Blakestown Way

The junction at Blanchardstown Road and Blakestown Way (Sheet 4) is very poor. Before considering the junction in total, it is worth highlighting some aspects that demonstrate how poorly thought out it is.

In Figure 7 below, at point A cyclists are supposed to yield for pedestrian traffic lights. But 5-10 metres later at point B they cycle on the footpath in "shared space" with the same pedestrians.

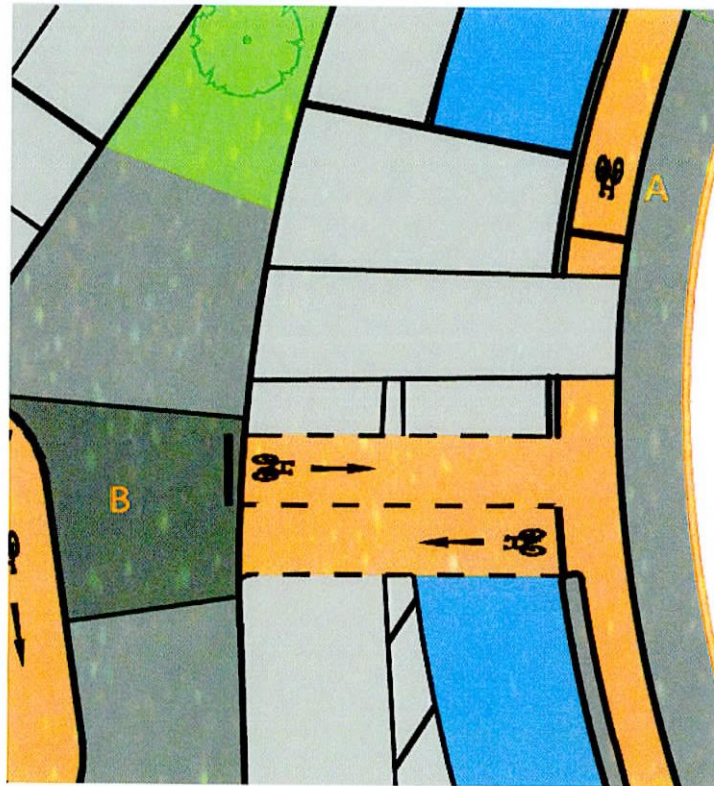


Figure 7: Junction at Blanchardstown Road and Blakestown Way – Cyclist/Pedestrian Interaction

In Figure 8 below, the points A where this island sticks out into the cycle lane serve no purpose. But they would significantly impede cyclists going straight through the junction and not turning left. They are a recipe for minor accidents as cyclists will hit these kerbs as they oddly jut into the cycle lane. This type of bizarre design would not happen with road space for motorists.

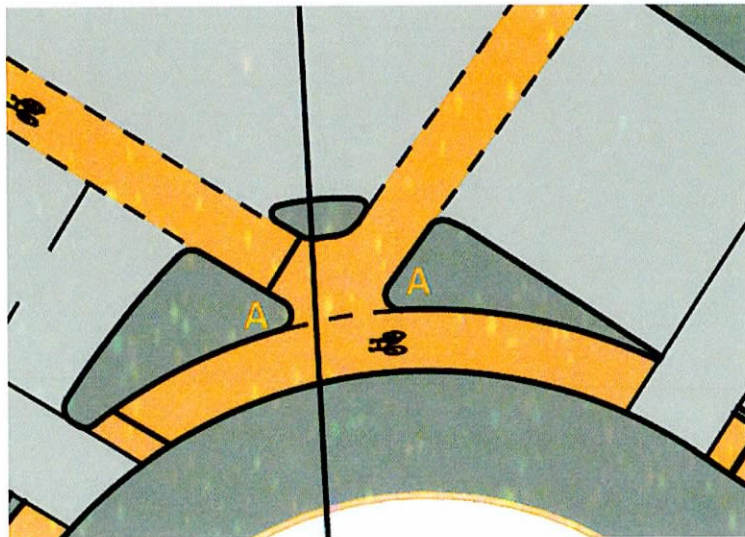


Figure 8: Junction at Blanchardstown Road and Blakestown Way – Cycle Junction

Moving on to the junction as a whole, most of same comments made above regarding the junction at Blanchardstown Road and Old Navan Road apply.

Pedestrian islands between the cycle lane and the main carriage way should be created at points A in Figure 9 below. Cyclist waiting points should be moved from points B to points C. And appropriate adjustments to traffic signalling should be made.

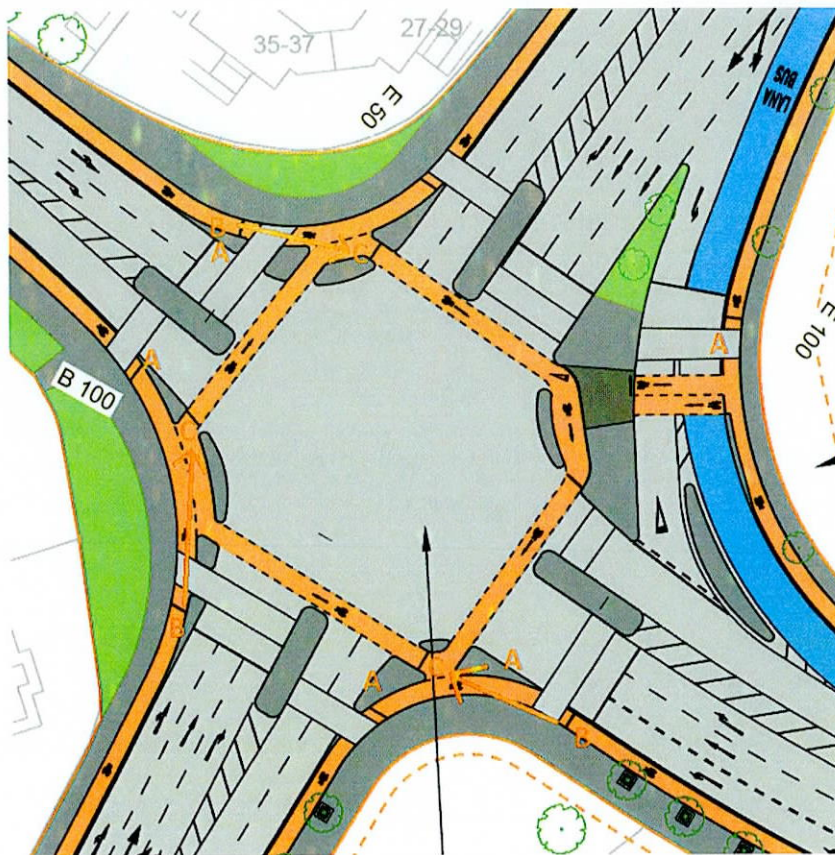


Figure 9: Junction at Blanchardstown Road and Blakestown Way

The New Blanchardstown Bus Station

We welcome the creation of the new Blanchardstown station (Sheet 5). However, we are confused by its design.

We don't fully understand the purpose of the road we have circled in red in Figure 10 below.

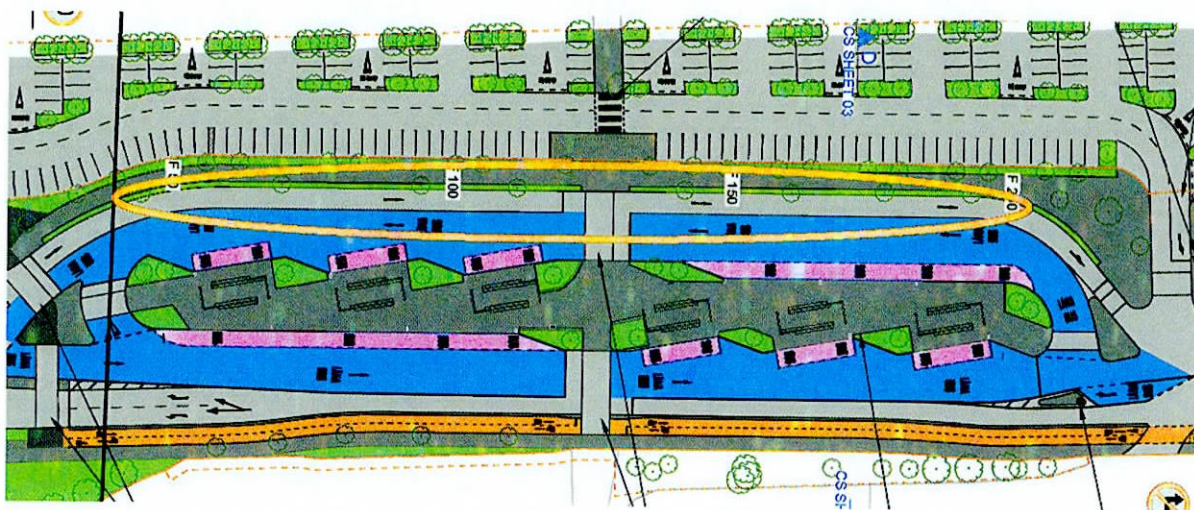


Figure 10: The New Blanchardstown Bus Station

Running directly parallel with this road a matter of metres away is a two-lane road. We appreciate this is within a car park, but, if necessary, adjustments to this road could be made. It would make more sense to use that road for car traffic than to have car traffic unnecessarily run through the bus station where there are likely to be many pedestrians.

The same applies to the road below the bus station in Figure 10 above. This road does not need to be there. It could very easily be outside the bus station. For example, it could be above it with the road moving in the opposite direction.

Making those changes might allow for the poorly designed junction at the entrance to the bus station to be resolved (Sheet 4).

In Figure 11 below, cars could then enter and exit at point A and the missing connection between the bike lane at points B and C could be created. Currently, there is no connection these two points at all. The two cycle lanes simply end and apparently zero thought has been given to what cyclists should do at this point apart from dismount and walk or cycle on the footpath.

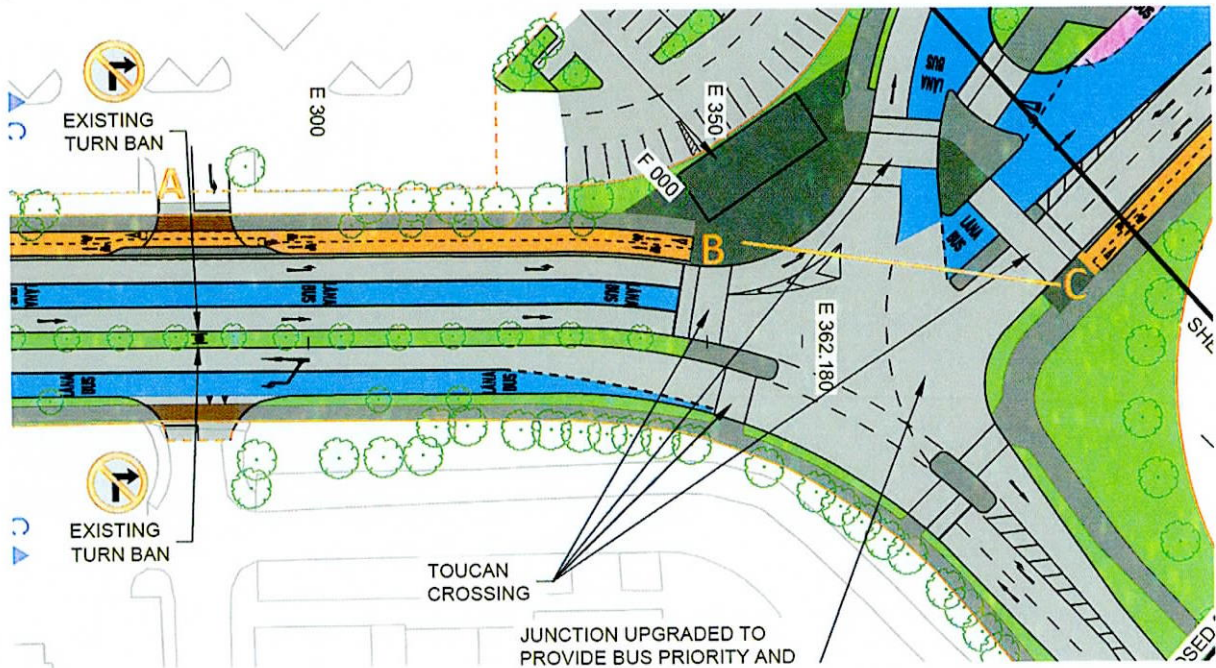


Figure 11: Junction South of New Blanchardstown Bus Station

The junction at the exit of the bus station is better but not much better. The shared cyclist/pedestrian space in Figure 12 below should be replaced with segregated cycle lanes and pedestrian islands between the cycle lane and the main carriage way.

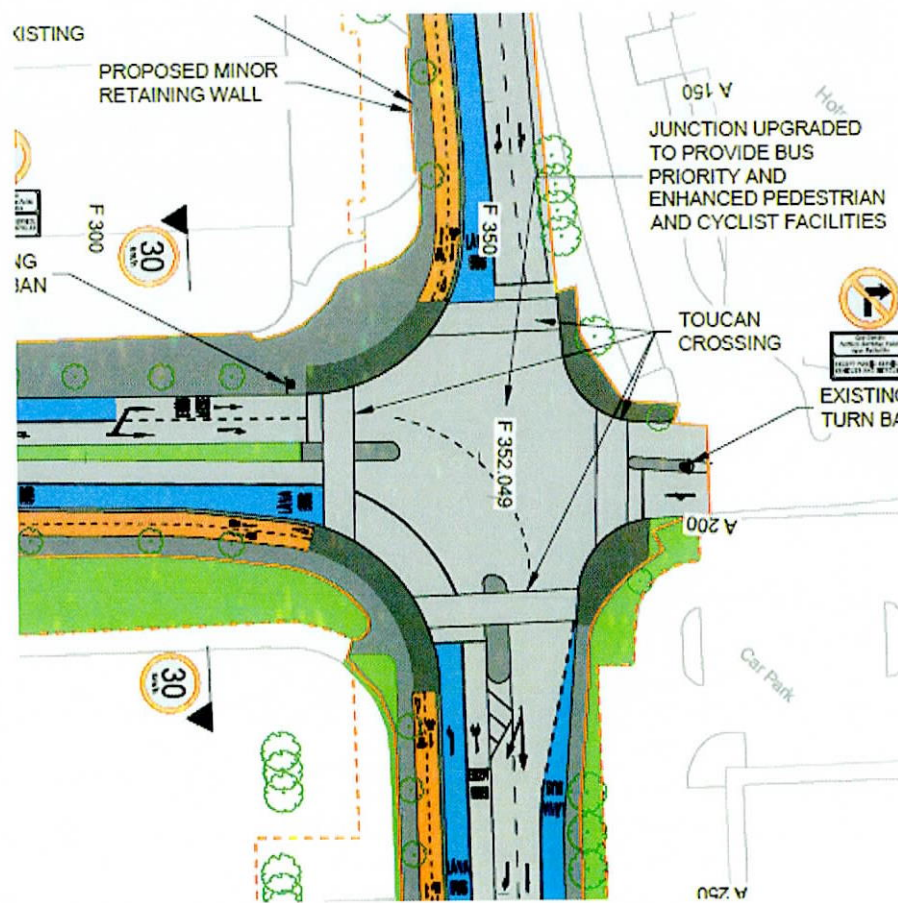


Figure 12: Junction North of New Blanchardstown Bus Station

Between Blanchardstown Bus Station and the Snugborough Junction

On the road from the new bus station and towards the Snugborough Junction (Sheet 6), there are a very large number of interruptions to the bus lane. (See Figure 13 below.) We think that alterations should be made here to ensure bus priority and to prevent private motorists from slow bus traffic here. For example, yellow boxes might be worth placing in front of all these entrances.

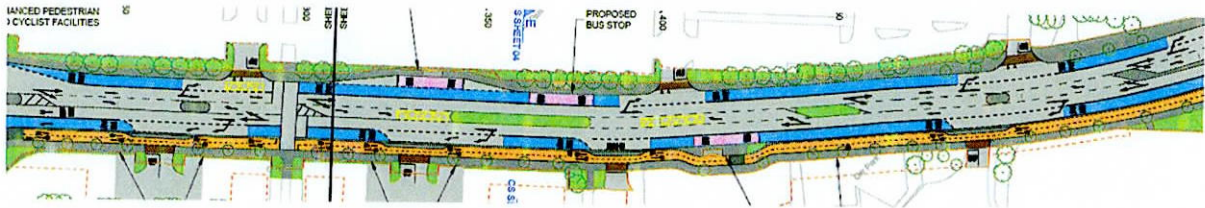


Figure 13: Between Blanchardstown Bus Station and the Snugborough Junction

Replacing the roundabout at the next junction (Sheet 7) with a signalised junction is welcome, however the junction as shown in figure 14 below should be improved. The shared pedestrian/cyclist space should be replaced with segregated cycle lands and proper pedestrian islands between the cycle lanes and the main carriage way.

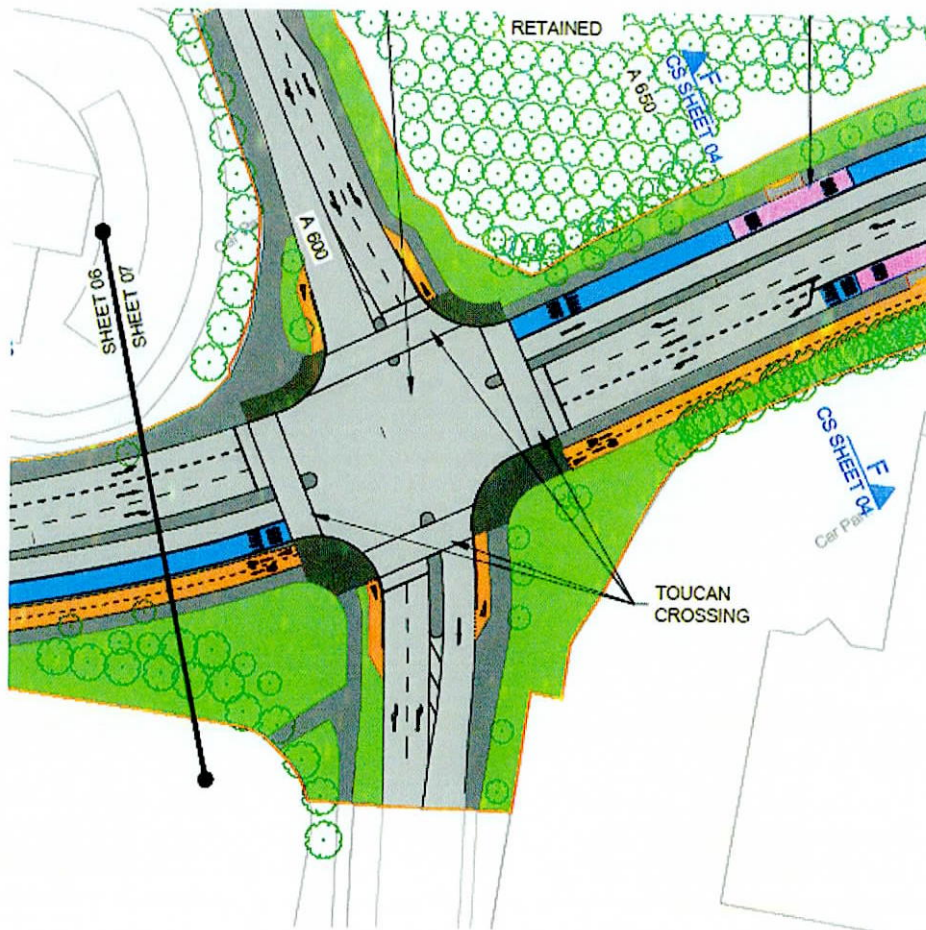


Figure 14: Junction before Snugborough junction

We stated above we would focus on sheets 1-6 and not making further comments on sheets 7-14. But to simply reiterate what was stated above: there is essentially no provision in this scheme for any cycling or pedestrian infrastructure between Snugborough Junction (Sheets 7/8) and Auburn Ave (sheet 15). We understand that the upgrade of Snugborough Junction is part of a separate scheme, and that off road cycling provision is planned. Nevertheless, the fact that this is not included as part of these scheme raises questions about whether "the aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure" is an accurate description of a scheme that for a substantial part provides no walking or cycling infrastructure.

PART 2 OF PROPOSED SCHEME - NAVAN ROAD

Of the three parts of this proposed scheme, the Navan Road part (sheets 15-27) is by far the simplest. While we have serious criticisms of the scheme from the Blanchardstown Shopping Centre to the M50 roundabout (sheets 1-14), we broadly welcome the design of the proposed scheme between the M50 roundabout and the junction with Cabra Road. However, we think there is some area for improvement. In particular, as with the earlier section, there are significant issues with a number of the junctions, in particular regarding the interaction with pedestrians.

As quoted above, the planning documents state that *"The aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor."* While we welcome the improved bus infrastructure in this section, we think there is significant room for improvement regarding the provision of improved walking and cycling infrastructure, in particular in relation to junctions.

However, first, it is worth stating that the implementation of increased bus priority infrastructure and improved cycle lanes in this section are very welcome.

We are aware that over this section, two options were considered where, to quote the report:

- *The first option would provide a four-lane carriageway with two bus lanes and two general traffic lanes in both directions with one-way cycle tracks; and*

- *The second option would provide a four-lane carriageway, with intermittent three-lane sections on two short sections of the route. The single lane arrangement would be controlled by bus priority signals. One way cycle tracks are proposed on both sides of the road adjacent to the footpath.*

We welcome the decision to pursue the first option and we fully support this decision.

We are aware that there are significant local concerns regarding the removal of trees, and we encourage that tree removal is kept to a minimum.

Junction design

Auburn Ave junction

As noted above, there is essentially no provision in this scheme for any cycling or pedestrian infrastructure between Snugborough Junction (Sheets 7/8) and Auburn Ave (sheet 15). And the junction where cycling infrastructure re-emerges at Auburn Ave (sheet 16) is unsatisfactory.

In Figure 15 below, at points A the way the cycleway merges with the main carriageway is unnatural and seems likely to generate conflicts between motorists and cyclists potentially leading to dangerous collisions. At points B, the use of "shared space" is both unnecessary and dangerous. There is ample space for segregated cycle and pedestrian crossings at these zebra crossings. It is unwise and unnecessary to merge cycle lanes and footpaths here in this manner. Doing so is likely to generate conflicts between pedestrians and cyclists potentially leading to dangerous collisions.

What is involved in the "Quiet Street Treatment" is unclear on the right of Sheet 7, and visible below at the most rightward A. It is not clear what will be used to reduce conflict between pedestrians and motorists here and what "treatment" will ensure that it is a quiet street.

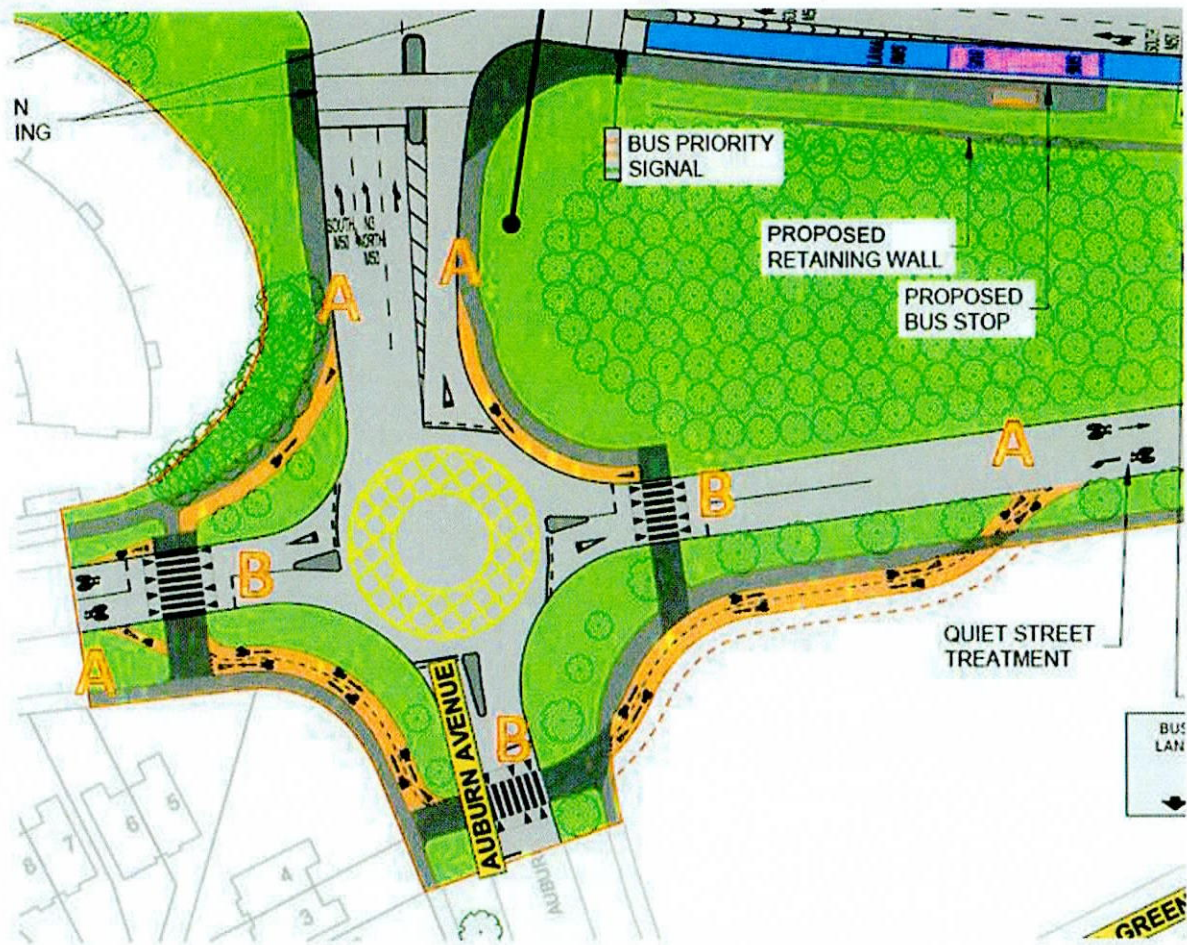


Figure 15: Auburn Ave junction

Navan Road Parkway Station

With the development of DART+, the Navan Road Parkway Station will become an important DART station. Therefore, ensuring safe access to it is important. However, the current design of the pedestrian and cyclist infrastructure at the bridge over the Navan Road and into the station is very poor and likely to generate conflicts both between motorists and cyclists and between pedestrians and cyclists potentially leading to dangerous collisions.

The pedestrian and cyclist "shared space" at points A on Figure 16 are unsafe and should be removed. The sharp curves in the cycle lanes at either side of the bridge are unlikely to be observed and are unsafe.

These junctions should be changed to bring the junction in line with best practice. (See comments regarding "Dutch-style" junctions above.) This might involve ensuring that (a) the merging of pedestrian and cyclist space is removed or reduced to a minimum, (b) cycle lanes allow for cyclists to move across the junction in a

natural manner without large unnatural bends, or without needing to dismount or merge with pedestrian space, (c) cyclists waiting points at junctions are moved out and ahead of motorist waiting points. For the last point we suggest moving cyclist starting points to points B on figure 16 below.

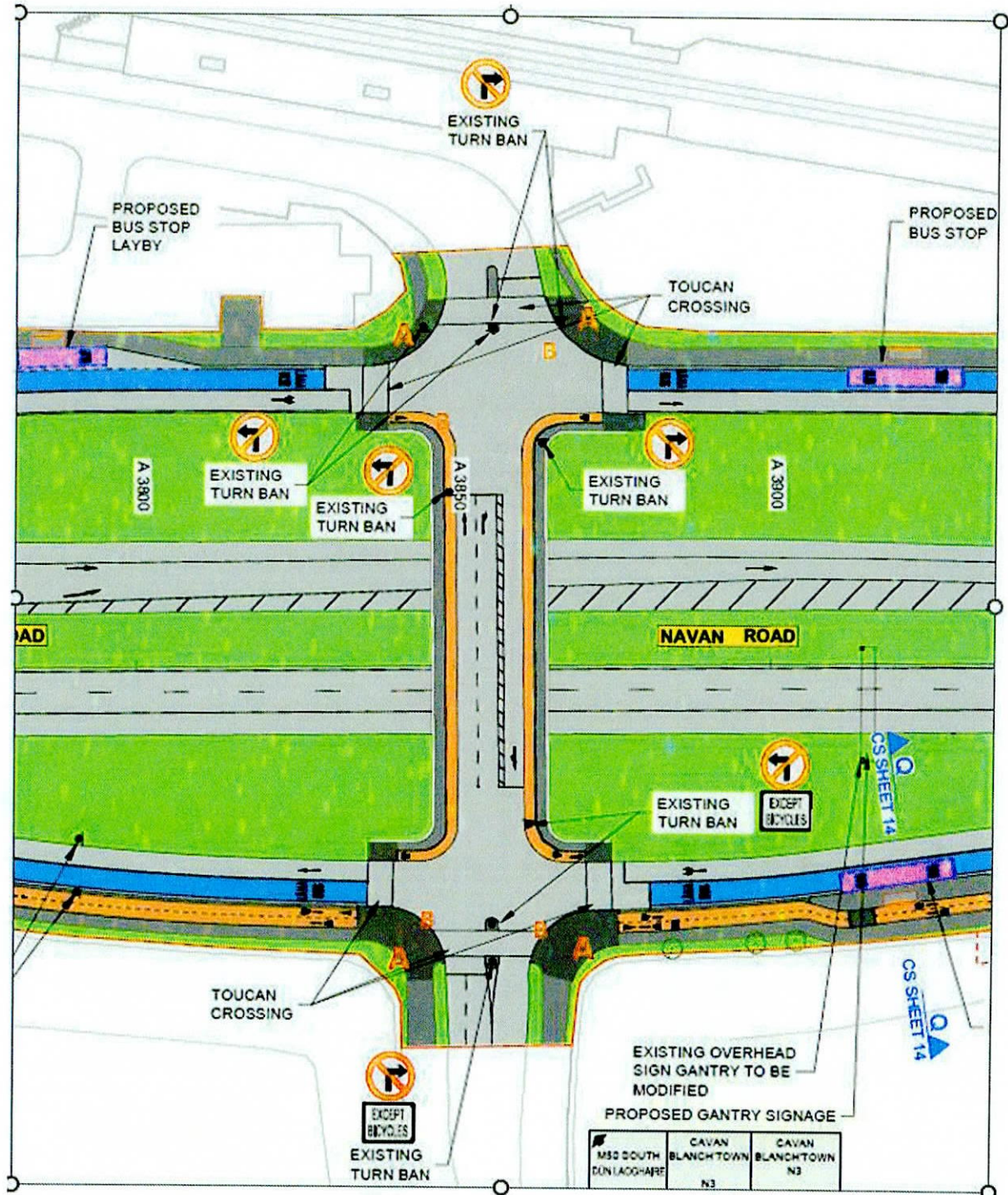


Figure 16: Navan Road Parkway Station

Junction at Phoenix Park Ave

Relatively simple repositioning of the cycle lane, footpath and pedestrian crossing at junction of Phoenix Park Ave and the Navan Road (Sheet 20) would remove pedestrian/cyclist conflicts here. (See figure 17 below.)

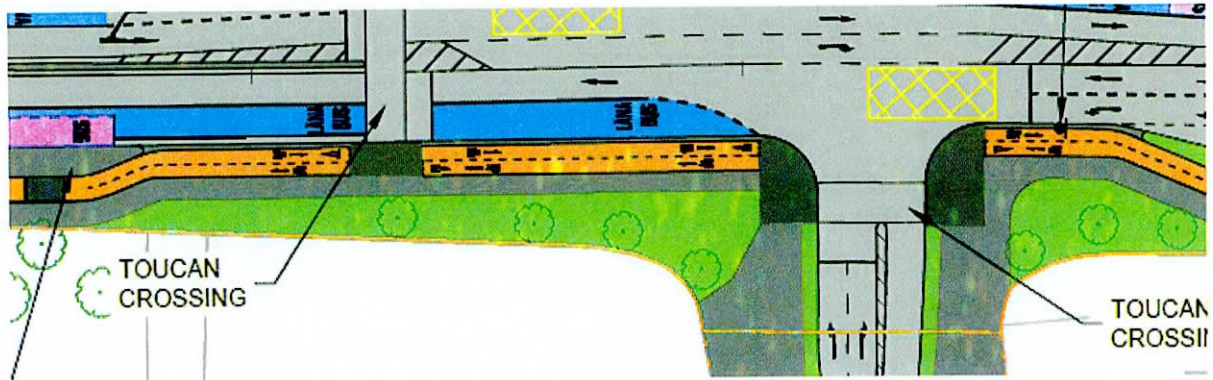


Figure 17: Junction at Phoenix Park Ave

The shared pedestrian/cyclist space at the junction should be removed, so that pedestrian and cyclist space is segregated at this junction.

Also, to the left of the junction in Figure 17, a pedestrian waiting point between the cycle lane and the main carriageway could be created by repositioning cycle lane. Currently, the design would appear to encourage pedestrians to wait for the traffic lights to change by standing in a cycle lane.

Junction at Phoenix Park Ave

As with many of the junctions in the first part of this submission, this is an example of a "Dublin style" junction. It should be replaced with a "Dutch-style" junction. This would involve removing the shared cyclist/pedestrian space at A on Figure 18 and replacing it with a segregated cycle lane and a pedestrian waiting point between the cycle lane and the main carriageway. Similar pedestrian waiting points should be created at the six point Bs. And the cyclist waiting points should be moved from points C so the waiting point for cyclists going straight is substantially ahead of the waiting point of motorists who may be turning left, with appropriate changes made to traffic light signalling for both cars and cyclists.

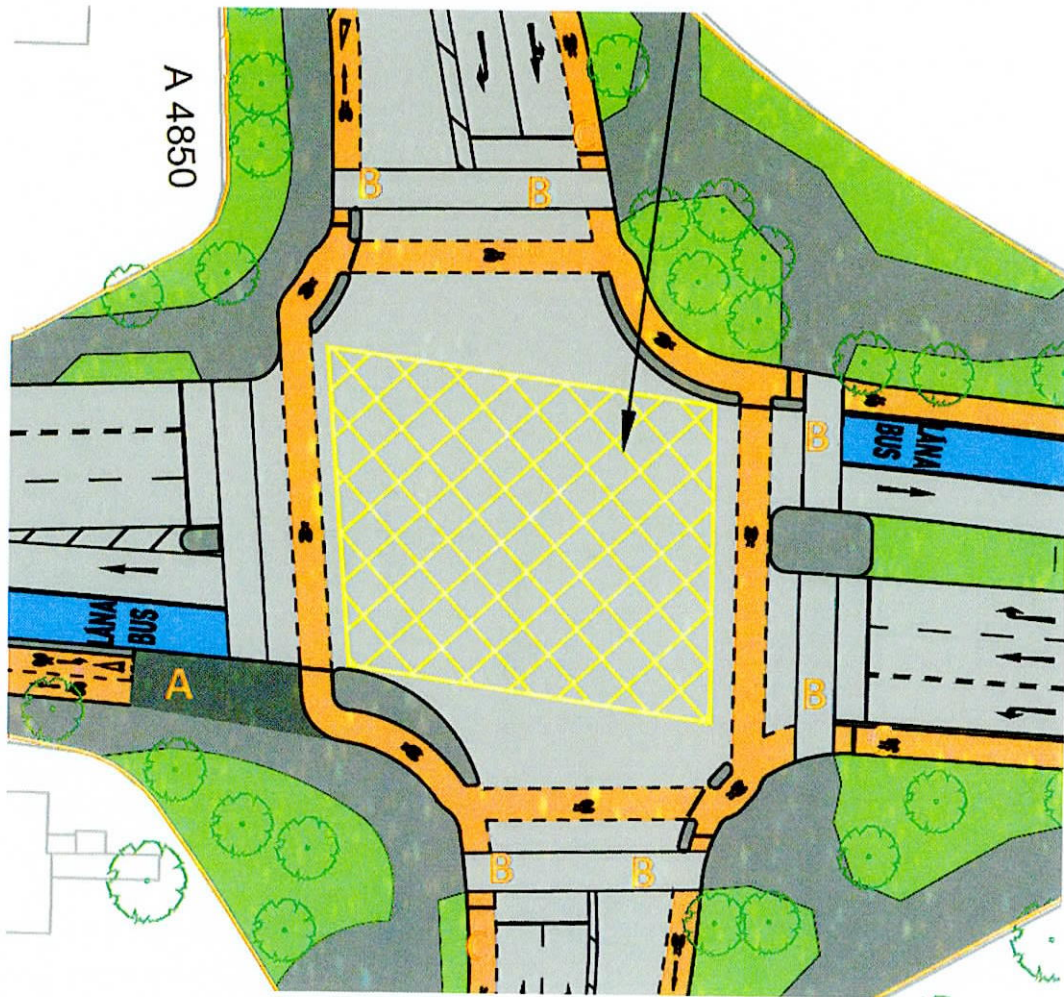


Figure 18: Junction at Phoenix Park Ave

Junction at Kempton Ave

To minimum pedestrian/cyclist conflict at the junction of the Navan Road and Kempton Ave (Sheet 22), pedestrian waiting points should be created at points A in Figure 19 below.

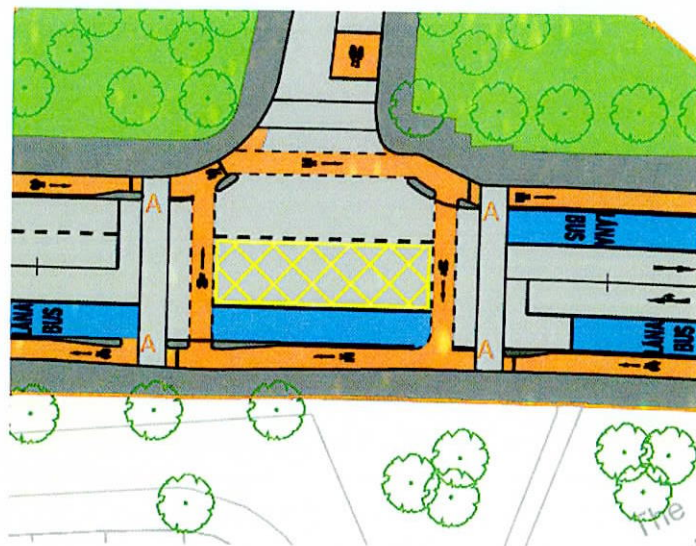


Figure 19: Junction at Kempton Ave

Junction at Ashtown Grove

Likewise, to minimum pedestrian/cyclist conflict at the junction of the Navan Road and Ashtown Grove (Sheet 23), pedestrian waiting points should be created at points A in Figure 20 below. And cyclist waiting points should be moved from points B to points C with appropriate changes made to traffic light signalling for both cars and cyclists.

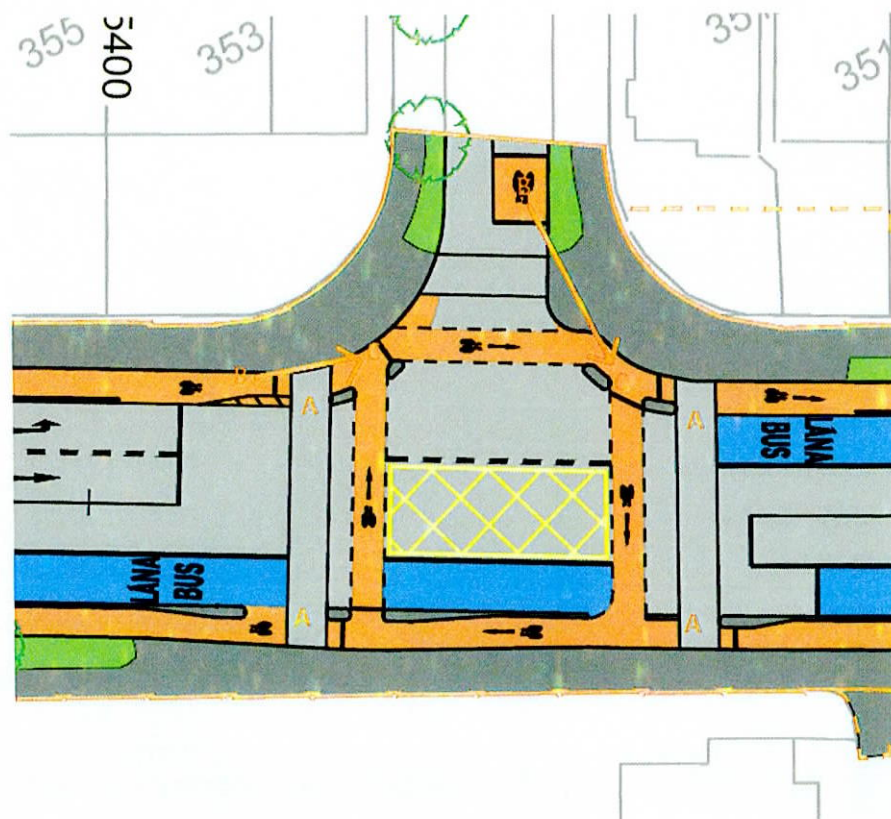


Figure 20: Junction at Ashtown Grove

Junction at Kinvara Ave

Similar changes should be made to the junction at Kinvara Ave (Sheet 24). Pedestrian waiting points should be created at points A in Figure 21 below. And cyclist waiting points should be moved forward from points B with appropriate changes made to traffic light signalling for both cars and cyclists.

Traffic Management

Through changes in road design, there are very substantial changes being made to the flow of private motor vehicles in this part of the scheme. A number of major roads, most significantly the Old Cabra Road, Prussia Street and Manor St/Stoneybatter are being closed to through-traffic for private motor vehicles. These interventions should end through-traffic via the Old Cabra Road, end south bound through traffic through Stoneybatter village and reduce northbound through-traffic. In addition to public realm improvements in Stoneybatter, we think this traffic reduction should greatly improve public transport movement and conditions for cyclists and pedestrians and we wish to voice our support for these interventions.

Cycle infrastructure and junction design

There are far fewer problems with either the design of cycle infrastructure or with junction design in this part of the scheme.

We welcome the segregated cycle lanes on Old Cabra Road, Prussia Street, Manor Street, Stoneybatter, Brunswick St, Queen Street and Blackhall Street. We appreciate that the section of Prussia Street without a segregated cycle lane will be substantially quieter as it will no longer have through traffic, but we would nevertheless prefer if it did have a segregated cycle lane.

Junction of Navan Road and Old Cabra Road

There is an excessive use of shared space between cyclists and pedestrians at the junction of Navan Road and Old Cabra Road (Sheet 28). This is most problematic at point A in Figure 22 below where does not appear to be any proper allowance for cyclists going straight from the Navan Road to the New Cabra Road.

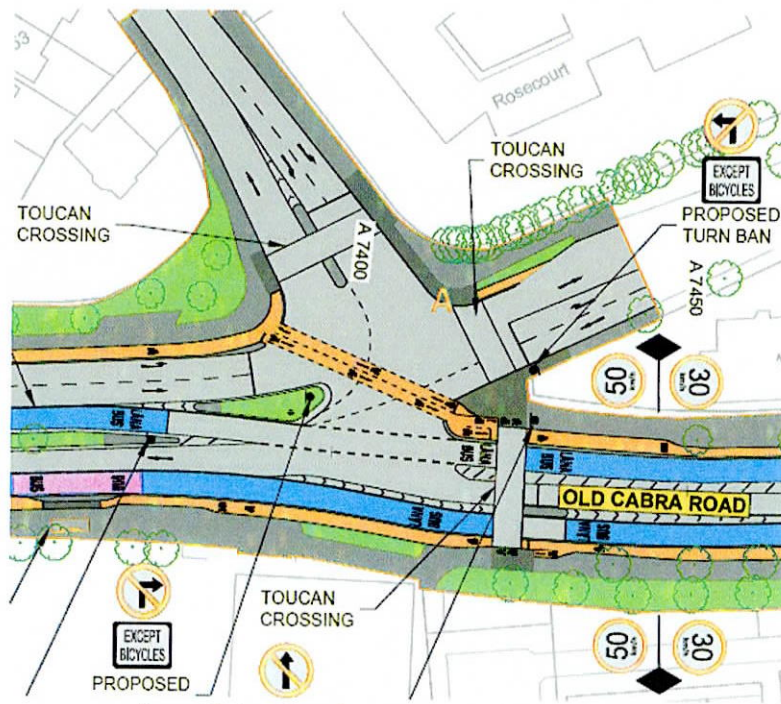


Figure 22: Junction of Navan Road and Old Cabra Road

The Junction of Brunswick St North and Stoneybatter

We recommend against the creation of a shared space at the junction of Brunswick Street North and Stoneybatter (Sheet 34). (See Figure 23 below.) This is a bad idea in at least three ways.

Firstly, the use of "shared space" by cyclists and pedestrians is always a bad idea and should be avoided.

Secondly, this results in the waiting point for cyclists at this junction being behind the waiting point for motorists and well back from the actual junction. This is already a very difficult and dangerous junction to navigate for cyclists when their starting is well ahead of this point, it would be almost impossible with a waiting point this far back from the junction.

Thirdly this shared space is outside a popular pub "Walsh's". The pub does not have a smoking area, so this is when this pub is open, there are nearly always people drinking and smoking cigarettes in this exact area. To direct a major arterial cycle lane into a "shared space" that is effectively the smoking area of a popular pub, frankly, is completely daft.

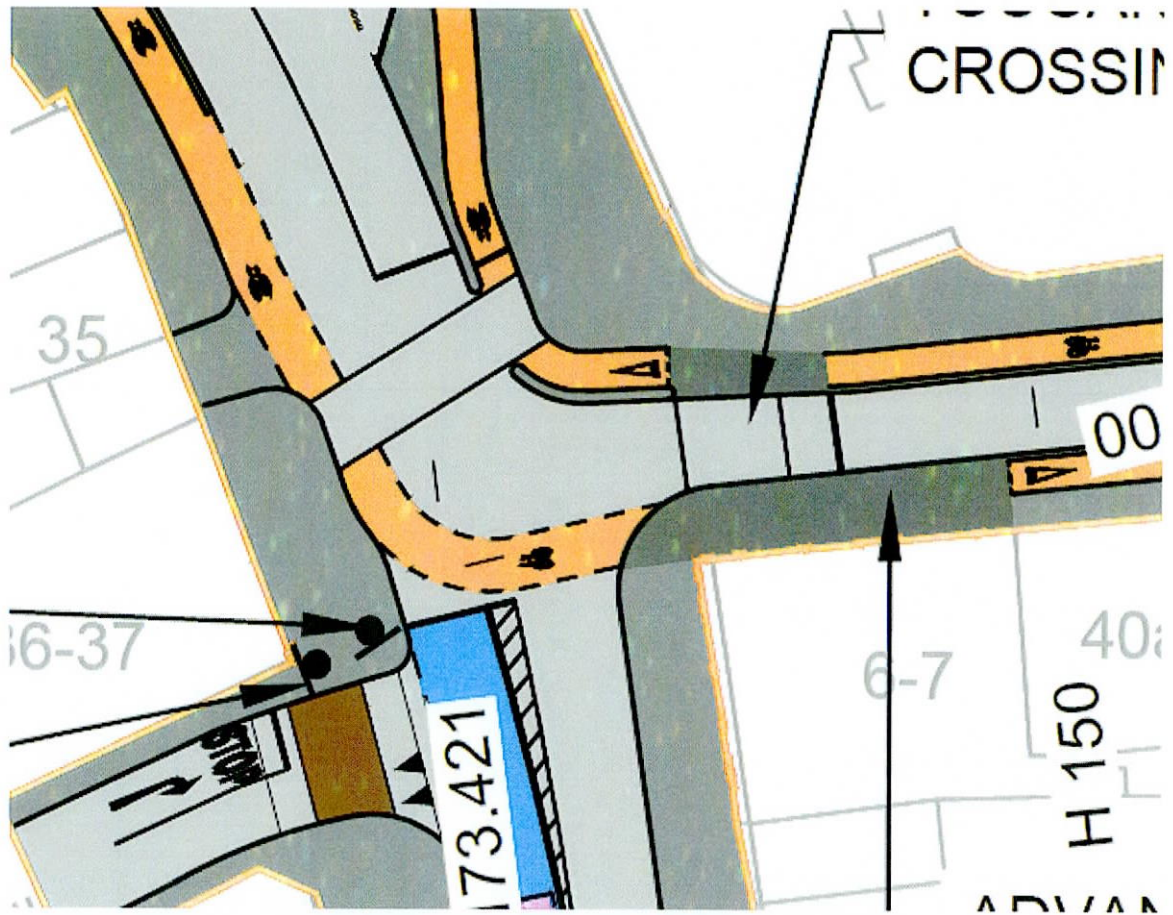


Figure 23: The Junction of Brunswick St North and Stoneybatter

Junctions at Manor Street, at Glenbeigh Road and at the North Circular Road.

With regards the junctions at Manor Street (Sheet 33), at Glenbeigh Road (Sheet 29) *and at the North Circular Road (Sheet 31)*, we reiterate our preference for pedestrian waiting points between the cycle lane and the main carriage way and having cyclist waiting points moved forward so that they are substantially ahead of the waiting point of motorists. Appropriate associated changes should be made to traffic light signalling for both cars and cyclists.