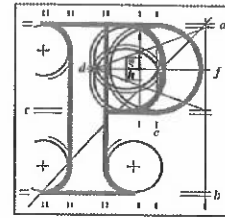


**Our Case Number:** ABP-314942-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

**Date:** 10th February 2023

**Re:** BusConnects Lucan to City Centre Core Bus Corridor Scheme  
Lucan to Dublin City Centre

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 meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Doina Chirtorescu  
Executive Officer  
Direct Line: 01-8737133

HA02

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1890 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

Plan  
Road  
Map



Our Case Number: ABN 214842-02  
Planning Authority Reference Number:

Dublin County Council  
5th Floor  
Kilbarrack  
Dublin 2

Date: 10/10/2011

1. The proposed development is a residential development consisting of 10 units.



Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

ABP case ref: 314942

## **BUSCONNECTS LUCAN 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.

### **Enforcement**

There are bus and cycle lanes, bus gates, bus priority lights, and turn bans for general traffic 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, rendering the core mission not

achieved. We strongly urge the NTA implement effective measures to secure the protection of bus lanes from illegal use.

## Bus lane operating hours

We strongly believe that all proposed bus lanes and bus gates should be operational 24/7. We believe this will have the following benefits:

- More achievable and reliable bus journey times
- Easier to enforce as there are no time specific allowances for private vehicles
- Highlights priority of public transport over private transport, leading to higher adoption from users
- In the absence of segregated cycle lanes, 24/7 bus lanes offer cyclists safer road space with less traffic

## Junction design

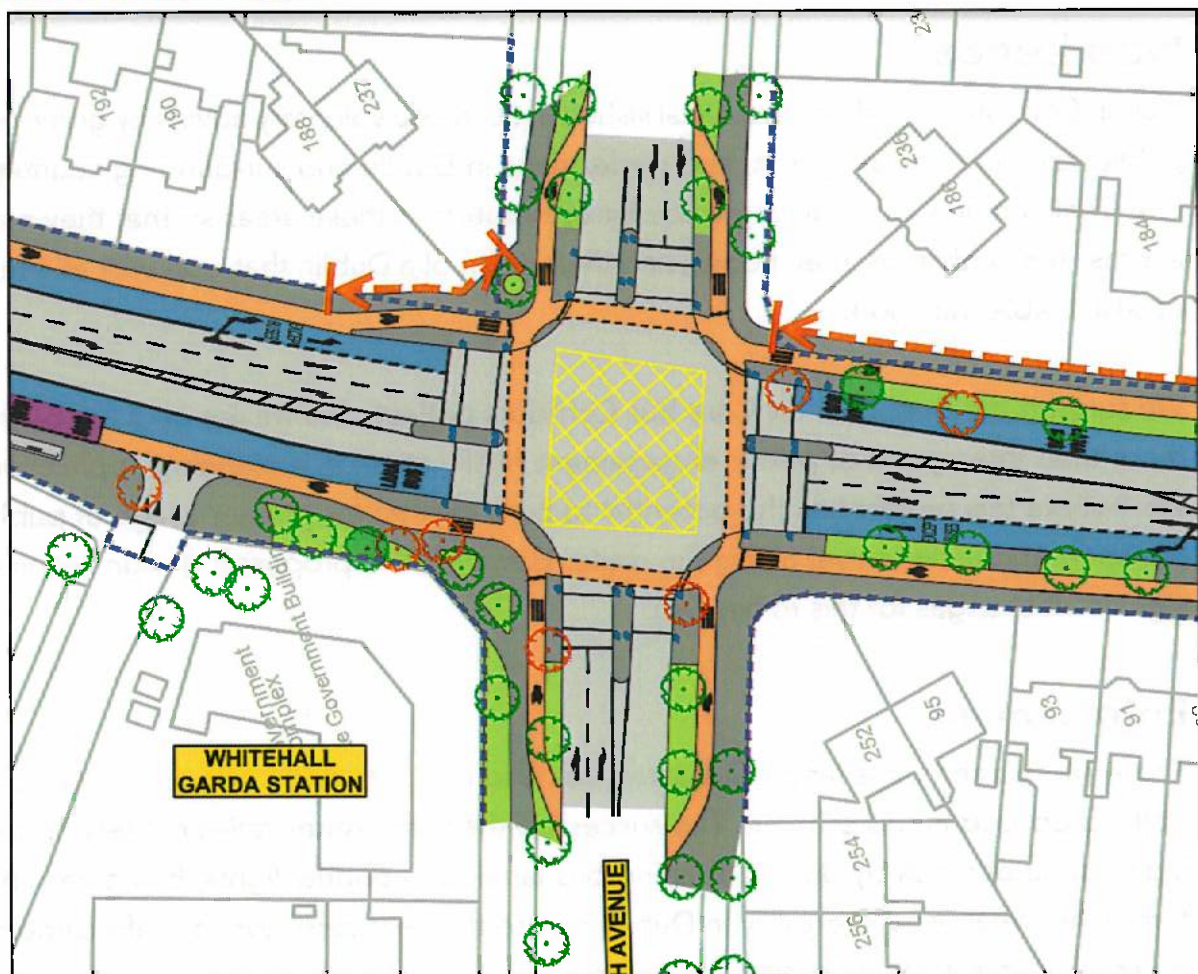


Figure 1 Dutch-style junction at Swords Road/Griffith Avenue from the second public consultation



The junction designs in the Proposed Scheme do not follow international best practice in junction design and are widely regarded as unsafe. We request that the NTA use Dutch-style junctions throughout the project.

## **Pedestrian crossings**

There are 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. Section 4.4.3 Junction Design of the Design Manual for Urban Roads and Streets states that “designers should omit staggered crossings in favour of direct/single phase crossings” and Section 4.3.2 Pedestrian Crossings states that “designers should allow pedestrians to cross the street in a single, direct movement” and that “where staggered/staged crossings currently exist they should be removed as part of any major upgrade works”.

Examples of multi-stage crossings that should be redesigned to comply with DMURS include:

- Memorial Road/Con Colbert Road junction
- Con Colbert Road/South Circular Road/St John’s Road junction

Furthermore, many three and four-way junctions are missing pedestrian crossings entirely on one or more arms. 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. Section 4.4.3 Junction Design of DMURS states that “designers should provide crossings on all arms of a junction” and Section 4.3.2 Pedestrian Crossings states “designers should provide pedestrian crossing facilities at junctions and on each arm of the junction”.

## **Bus stop design**

A major concern throughout the Proposed Scheme is the width of the bus stop islands that are proposed. Bus stop islands are crucial for the safety of cyclists and for encouraging all ages and abilities to use cycling infrastructure by removing conflicts between buses and bicycles. However, narrow islands place cyclists in conflict with boarding and alighting bus passengers.

Figure 2 shows how the maintenance of two excessively wide general traffic lanes in each direction on Con Colbert Road forces pedestrians and cyclists to share a very narrow, unprotected space next to a dangerous road. Reducing the number of general

- traffic lanes at this junction would increase journey times slightly for private motorists
- but more importantly would give the design team sufficient room to build a safe environment for all ages accessing Memorial Gardens and its schools and clubs by foot, bicycle and bus.

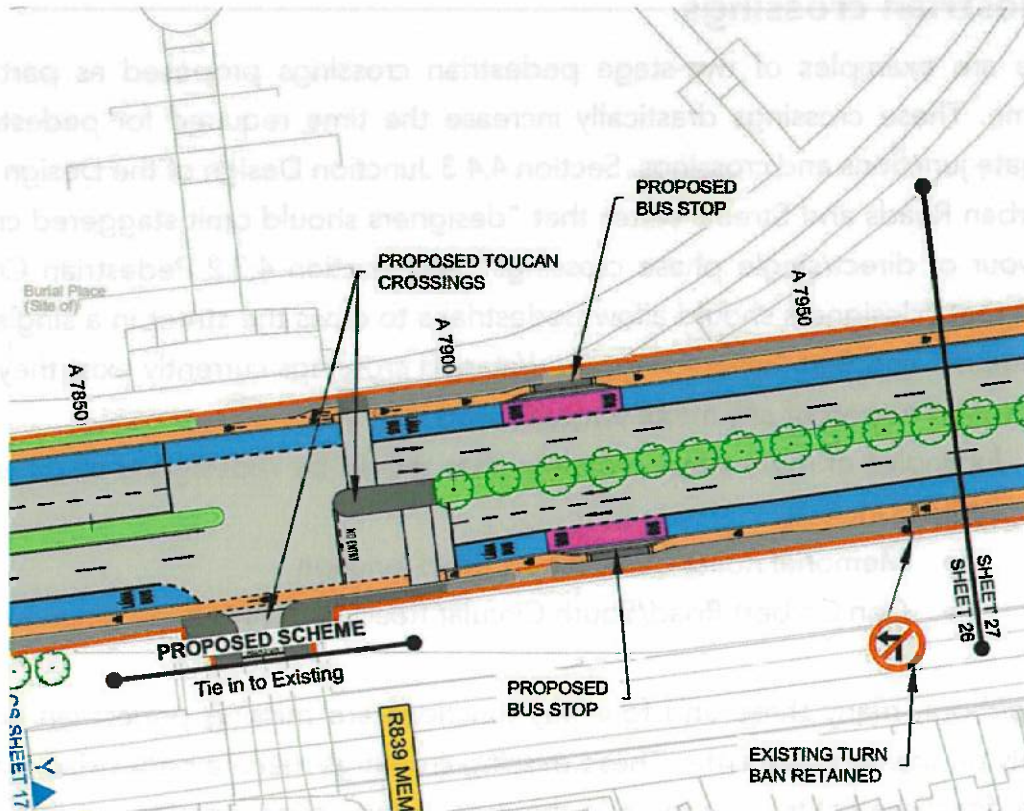


Figure 2 Bus stops with inadequate bus stop islands for cycling on Con Colbert Road near Memorial Road

## Shared space

We recognise that similar commentary criticising the excessive use of shared space (between pedestrians and cyclists) has been provided by other observers, cycling advocates and disabilities groups to this application and other recent Core Bus Corridor projects. There is an inadequate and poorly designed fait-accompli present within the subject scheme and other comparable projects, whereby a compromise to retain space for car traffic is prioritised over segregated or safe integration of active travel modes. Throughout the consultation processes it has been highlighted as a short-coming of the Bus Connects programme that international best practice or safe and innovative solutions have not been implemented or duly considered. We also would like to criticise and caution that strict adherence to out of date Irish standards will not, in combination, contribute to a safe and attractive environment for pedestrians or cyclists.

There are many junctions where the use of shared space pavement is provided where turning movements or yield areas are created for cyclists who are forced into the same spaces as pedestrians. This is significantly sub-standard given the wider scope of the Core Bus Corridor project and the potential influence it can have on the overall modal split within the Metropolitan area. This substandard design has the potential to seriously injure the vitality and usability of the public realm for the general public. Of particular concern is the conflict and danger presented by the use of shared space where it concerns those with disabilities, who may not be able to react or respond to the additional danger presented by shared space with cyclists adequately. Such additional risk can damage the reputation and general perception of the public realm and particular roads for the independent mobility of all road users.

The very nature of the Core Bus Corridor programme of investment is to improve the movement and segregation of transport modes away from car dependency and to reduce conflicts and congestion between existing modes. It is anathema to the purpose of this project to continue to provide sub-standard and ill-considered shared use where alternatives and segregation are possible.

We strongly recommend that where issues have been highlighted by others that the Board considers interventions and improvements for the general safety and comfort of the public.

## **Bicycle Parking**

Chapter 4 of the proposed scheme does not state where bike parking will be located in the Proposed Scheme nor does it appear in the general arrangement drawings.

The following policies of the adopted Dublin City Council Development Plan 2022-2028 address the allocation, protection, and creation of cycle parking facilities.

### **SMT08 – Cycling Infrastructure and Routes**

*'To improve existing cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages, and to create protected cycle lanes, where feasible. Routes within the network will be planned in conjunction with green infrastructure objectives and the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policies GI2, GI6 and GI8 and objective GI02.'*



## SMT012 – Cycle Parking Spaces

*'To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.'*

In our considered opinion it is important to provide for the best quality bicycle parking facilities at bus stops and public transport interchange locations over the length of the proposed project. Whilst much of the proposed scheme concerns itself with road engineering and traffic management, it is also a project which provides for a significant linear improvement to the public realm. In order to provide for a significant modal shift for walking and cycling it is vital that the best possible opportunities for considered cycle parking are provided in conjunction with cycling infrastructure. We recommend that the Board consider the newly adopted Development Plan in relation to this provision at that conditions be set to provide for additional identified areas of dedicated cycle parking and rational inclusion of stands and storage locations which complement the provided cycle lanes and interface with public transport stops and interchanges.

## Lane widths

The scheme proposes lane widths of 3.3m and up to 3.5m for general traffic which encourages speeds well beyond the proposed speed limits. Often, these excessive widths are proposed beside cycle lanes with inadequate width or areas with shared space for pedestrians and cyclists which is undesirable. These general traffic lane widths should be reduced to enable lower speeds and reallocated to cycle lanes and footpaths.

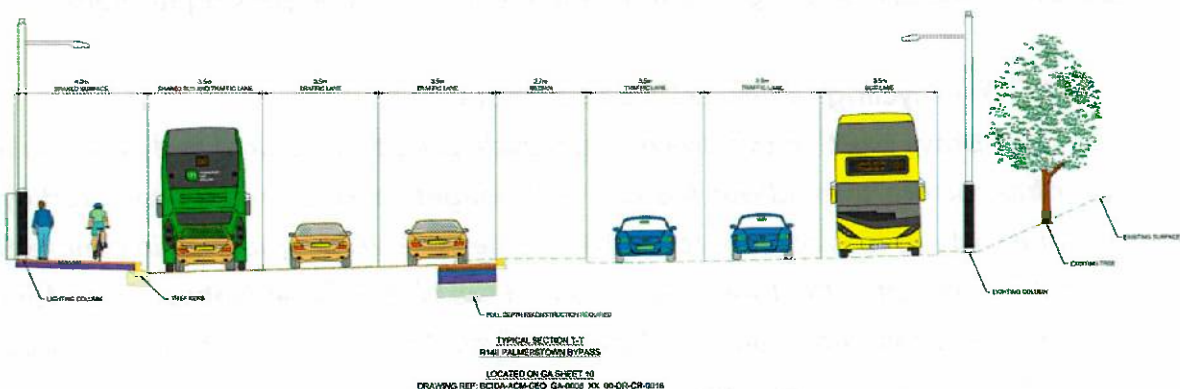


Figure 3 Cross section T-T: Excessive 3.5m lanes proposed beside shared space for pedestrians and cyclists on Palmerstown Bypass



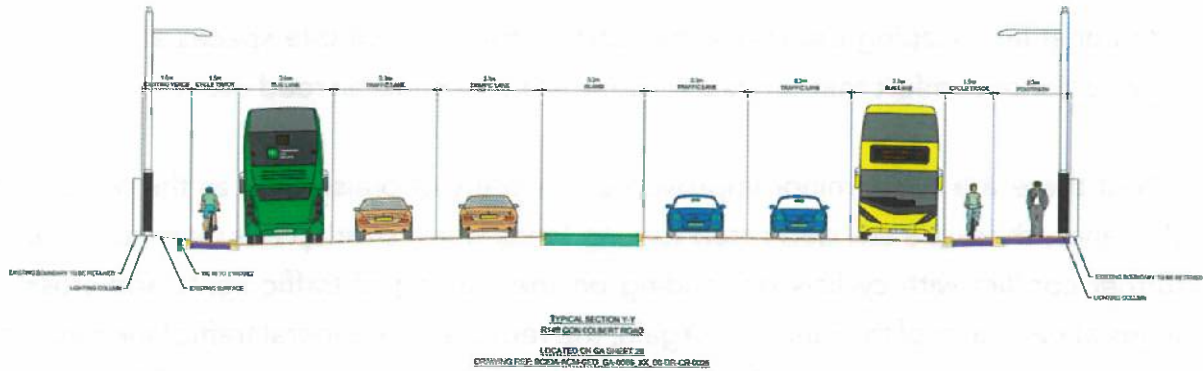


Figure 4 Cross section Y-Y: Excessive 3.3m lanes proposed beside narrow 1.5m cycle lane on Con Colbert Road

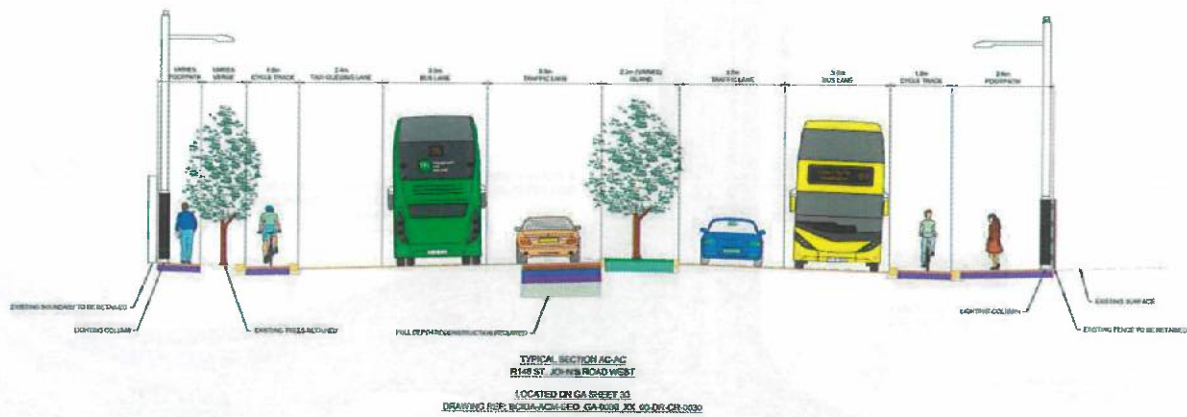


Figure 5 Cross section AC-AC: Excessive 3.3m lane proposed beside narrow 1.5m cycle lane and narrow footpath on St. John's Road West

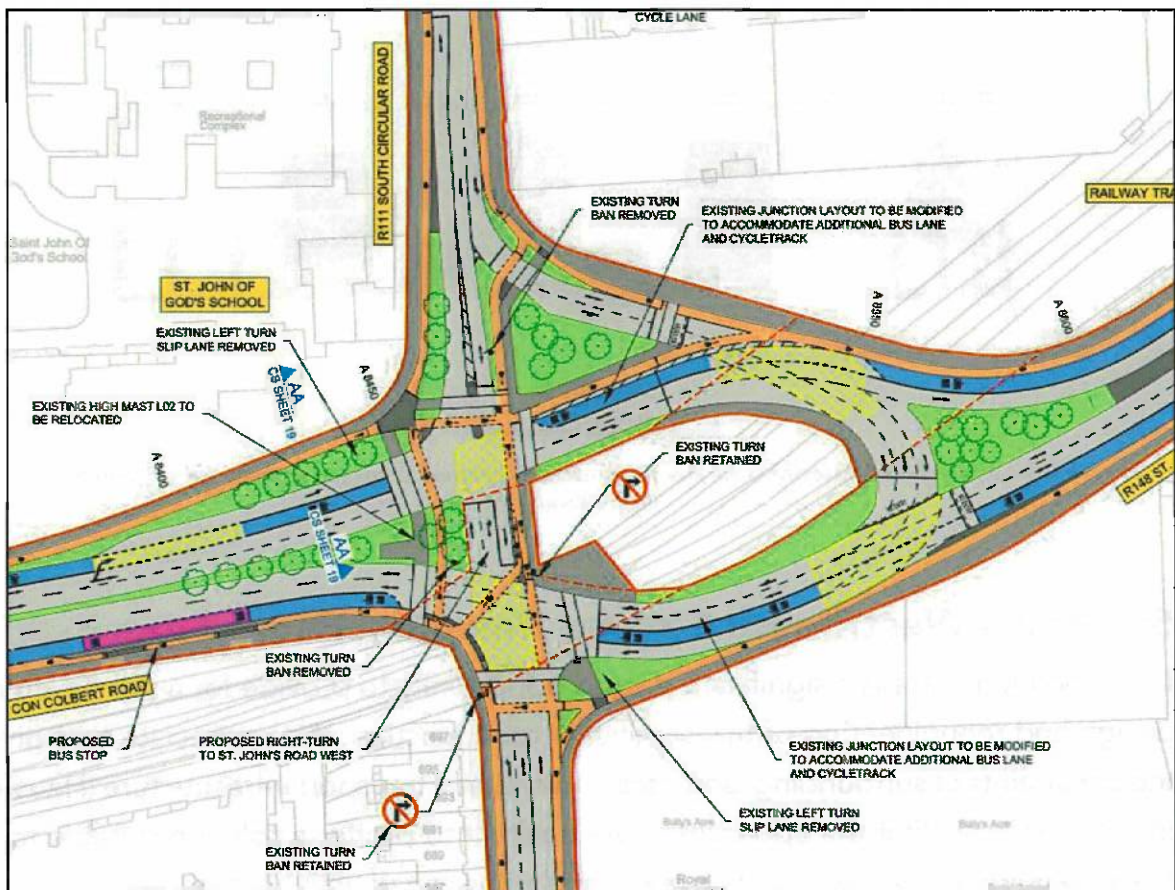
## St. John's West/South Circular Road junction

In our opinion there is a significant missed opportunity to provide for a significant re-design and reengineering of this significant road junction. We appreciate that given the constraints of surrounding land uses and national transport infrastructure (Heuston mainline railway) that the applicants were hesitant to proffer a solution suitable to all road users for an improved public realm and provision of active travel.

Once again, we object in the strongest terms to the use of shared space where turning movements may be required for cyclists. We also express concern that the provision of new updated landscaping does not provide for an enhanced public realm. Rather in main instances it reduces the available space for the segregation of walking and cycling. Given the nature of this junction as a semi- roundabout it is our firm belief that this will not be a public space enjoyed by the general public for social activity or

lingering, there are no destinations within the footprint of the junction. Rather additional landscaping broadens the scale of this inhospitable spaces and provides no additional comfort that this is a place which welcomes all road users.

Whilst there are some minor improvements worthy of praise such as the removal of slip lanes, there are still dedicated turning lanes which overlap bus lanes, and create further conflict with cyclists depending on the staging of traffic lights and crossing times at each arm of the junction. Again, the removal of a general traffic lane between this junction and the Memorial Road junction would facilitate more efficient, safer design in line with the decarbonisation goals of this project.



Continuing to retain the relative geometry of the existing junction is a significant missed opportunity for the applicant to work in concert with other state agencies and landowners in the vicinity, especially CIE/ Irish Rail, to provide an improved junction. Whilst the DART+ South West programme of investment has progressed at the same time as this project there is no evidence that there has been any will to combine the projects or accommodate a comprehensive redesign at this location or at other

bridges subject to redesign at Memorial Road and Sarsfield Road. The proposed scheme locks in a degree of fixed infrastructure into the road layout that will provide an inadequate environment if completed before the provision of rail improvements below.

## **Chapelizod Hill Road**

The provision of bus stops within the Chapelizod bypass is of serious concern. The dual-carriageway nature of the by-pass at this location is a hostile environment for introducing pedestrians. This requires significant land-take from the verges of the road as well as the accompanying natural screening provided by the trees and unmanaged recolonising growth which lines the dual-carriageway.

The felling of trees and removal of hedgerows at this location is regrettable and should be minimised through reallocation of existing road space. There is an opportunity at this location to taper the flow of car traffic or limit lane widths adjacent to the proposed bus stops. Maintaining higher traffic speeds at this location fails to consider the safety and comfort of public transport users who will be exposed to unhealthy levels of traffic noise, additional risk, as well air and particulate pollution.

We note that the existing bridge is currently too low to accommodate vehicles over 2.8m. The legal height for vehicles on Irish roads is 4.6m. The low height of this bridge regularly results in bridge strikes and accidents at this location. There exists an opportunity to provide a local mobility filter on Chapelizod Hill Road. This could reduce the carriageway for pedestrians and cyclists only. In turn this can provide traffic calming of the road and allow for a two-way cycle track for local access. We recommend that the Kylemore road can easily be used as an alternative route for HGVs and personal vehicles which need to access surrounding neighbourhoods and alternative routes towards the Chapelizod by-pass.

## **Climate Action Plan**

Considering the flaws outlined with the project we do not believe the Lucan Scheme, as proposed, is compliant with the legally binding Climate Action Plan (CAP). The CAP commits relevant agencies to achieve a 50% reduction in transport emissions by 2030. Key transport actions are grouped under the "Avoid-Shift-Improve" framework which requires radical change to the way we use our road space—an ambition that is not reflected in this scheme.

