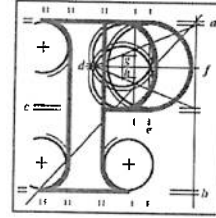


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Dublin Commuter Coalition
5 Abbeyfield
Killester
Dublin 5

Date: 18 August 2023

Re: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme
Templeogue/Rathfarnham to City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this 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

HA02A

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Dublin Commuter Coalition
5 Abbeyfield
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Dublin 5

ABP case ref: 316272

BUSCONNECTS TEMPLEOGUE/RATHFARNHAM 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 four 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.

GENERAL COMMENTS

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 to 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

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”.

The following two-stage pedestrian crossings are clearly inconsistent with the Design Manual for Urban Roads and Streets:

- Camden Street Upper/Charlotte Way
- Highfield Road/Palmerstown Road
- Templeogue Road/Old Bridge Road

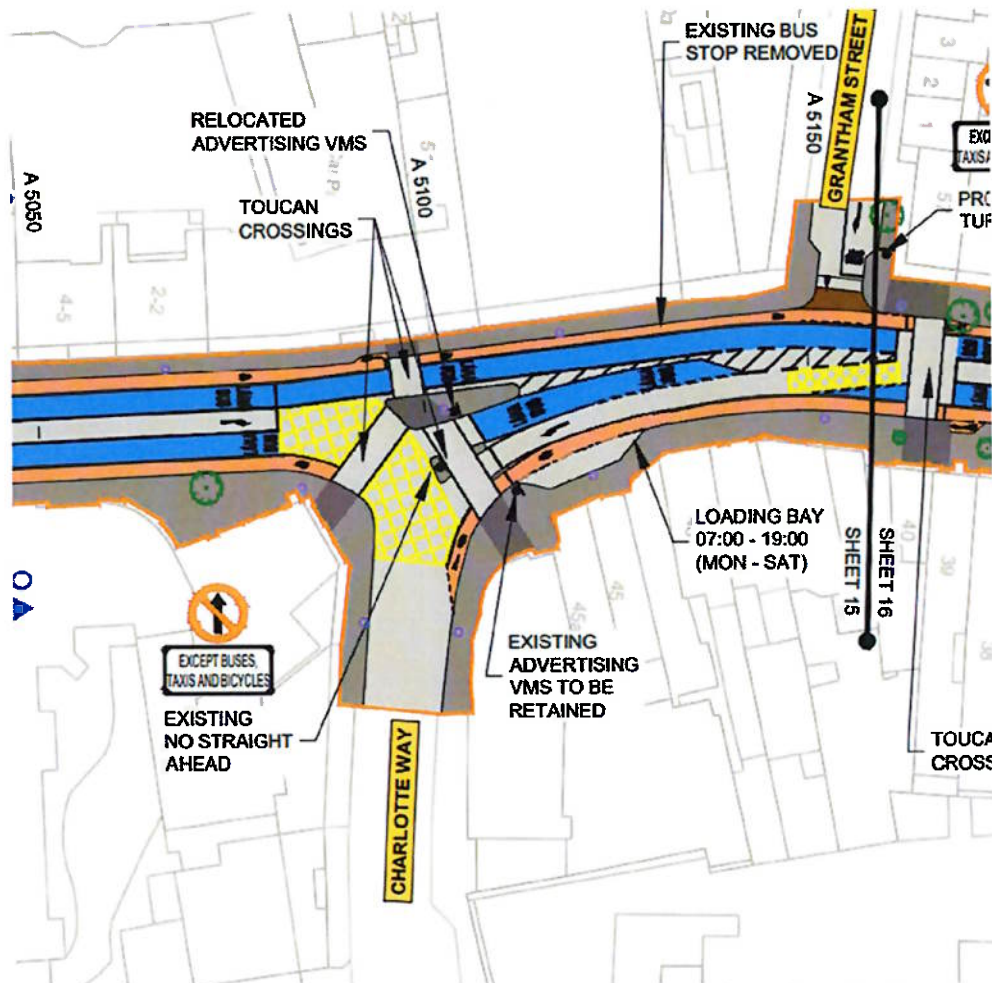


Figure 1 Example of two stage pedestrian crossing at Camden Street/Charlotte Way

Furthermore, some 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”.

These junctions are clearly not in compliance with DMURS:

- Rathdown Park/Rathfarnham Road
- Rathmines Road Lower/Richmond Hill/Military Road
- Rathmines Road Lower/Grove Road/Cheltenham Place
- Rathmines Road Lower/Richmond Row/Charlemont Mall
- Aungier Street/Longford Street Little
- Templeogue Road/Old Bridge Road

Junction design

The junction design in the Proposed Scheme does 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.

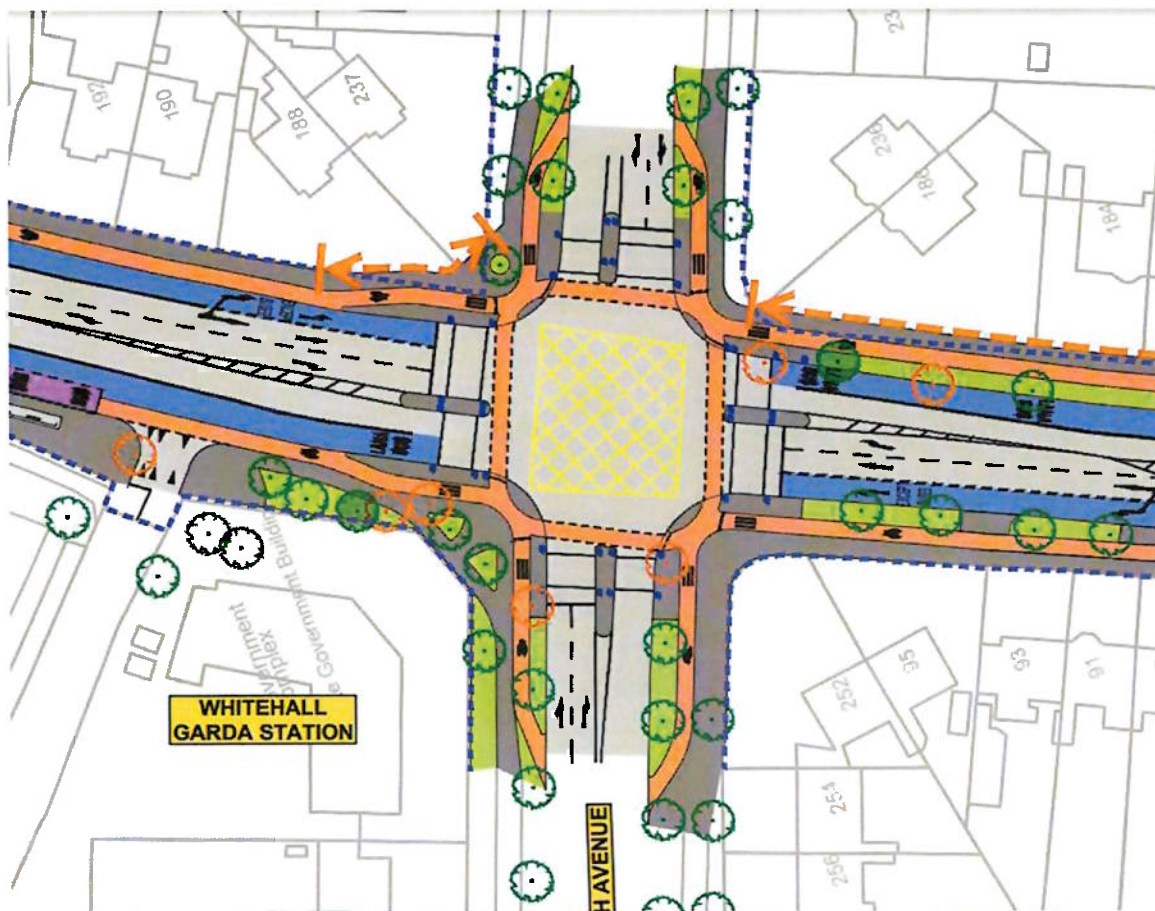


Figure 2 Dutch-style junction at Swords Road/Griffith Avenue from the second public consultation

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.

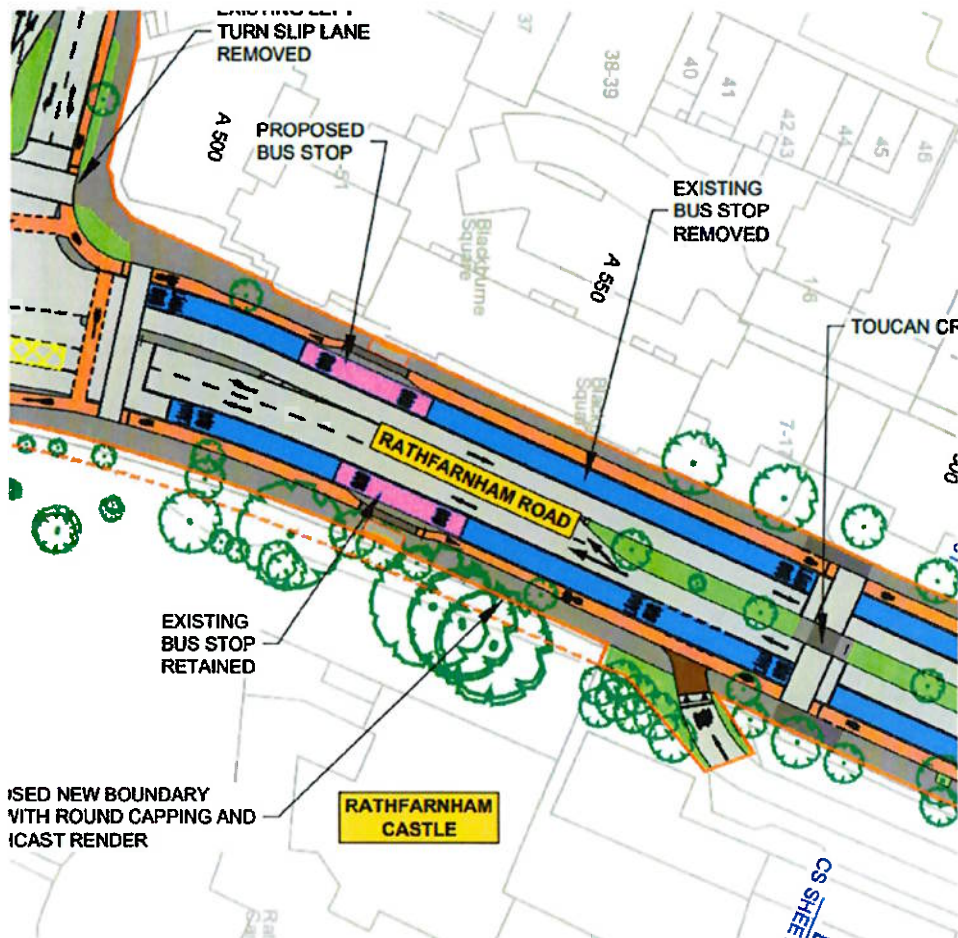


Figure 3 Bus stops with inadequate bus stop islands for cycling on Rathfarnham Road

Furthermore, the design proposes routing the cycle track between the bus shelter and the road at several locations. This is not the international best practice and causes unnecessary conflict between bus passengers and cyclists. Figure 3 shows a much safer design on Grange Road where the cycle track is routed behind the bus shelter.

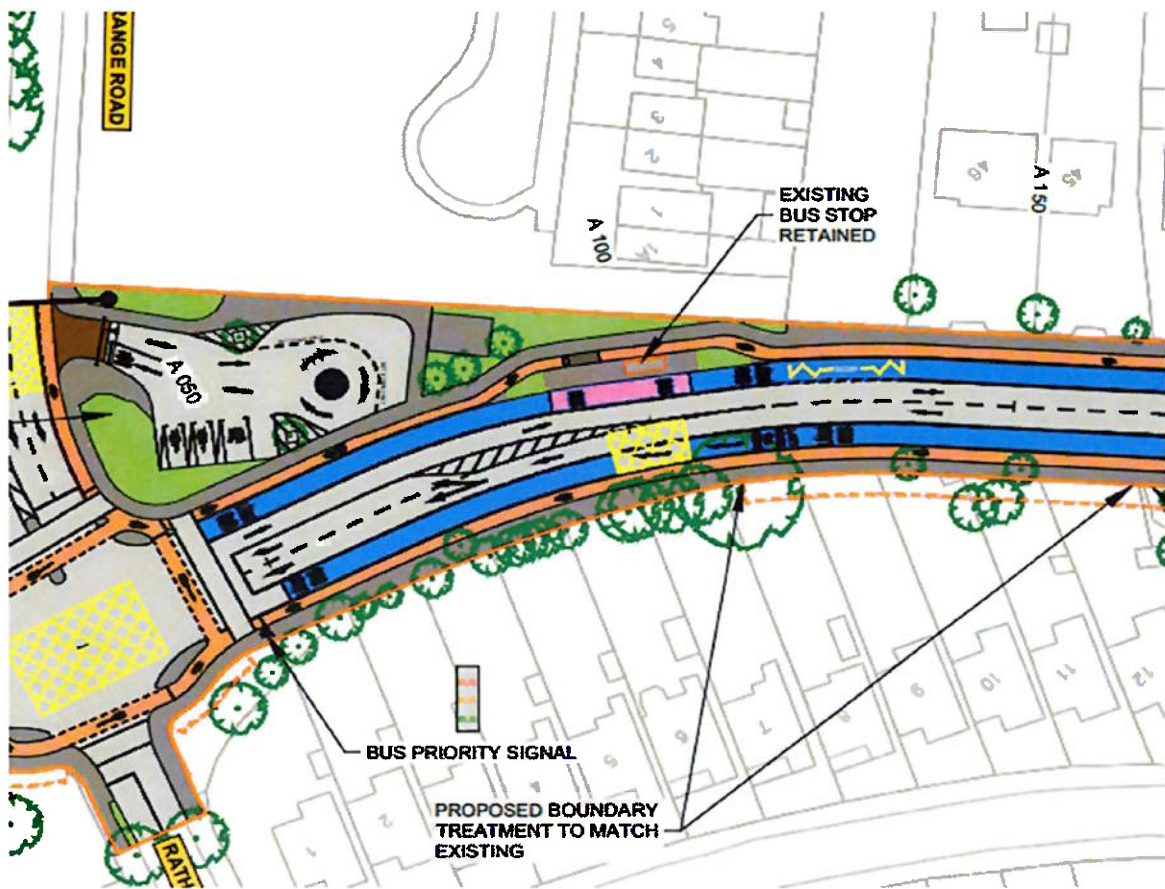


Figure 4 Example of a safer island bus stop design

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

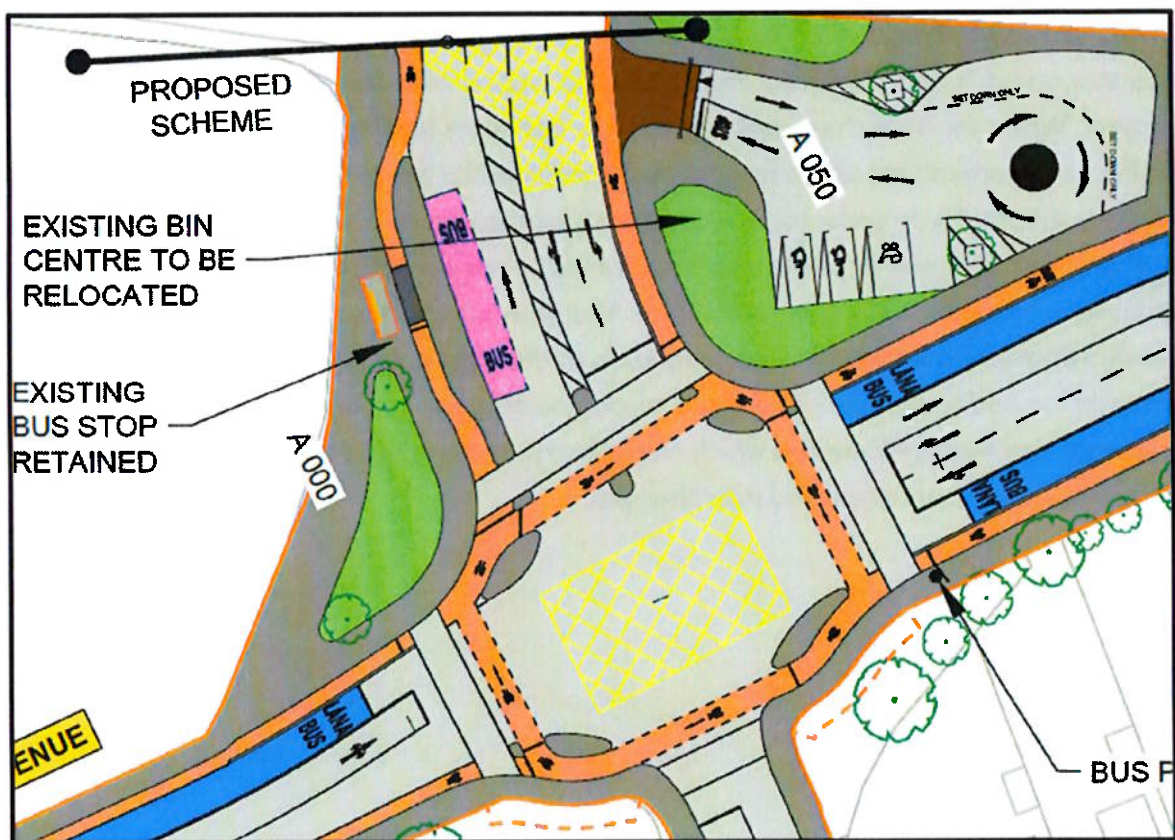
'To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.'

In our 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.

SPECIFIC COMMENTS

Nutgrove Avenue/Rathfarnham Wood junction

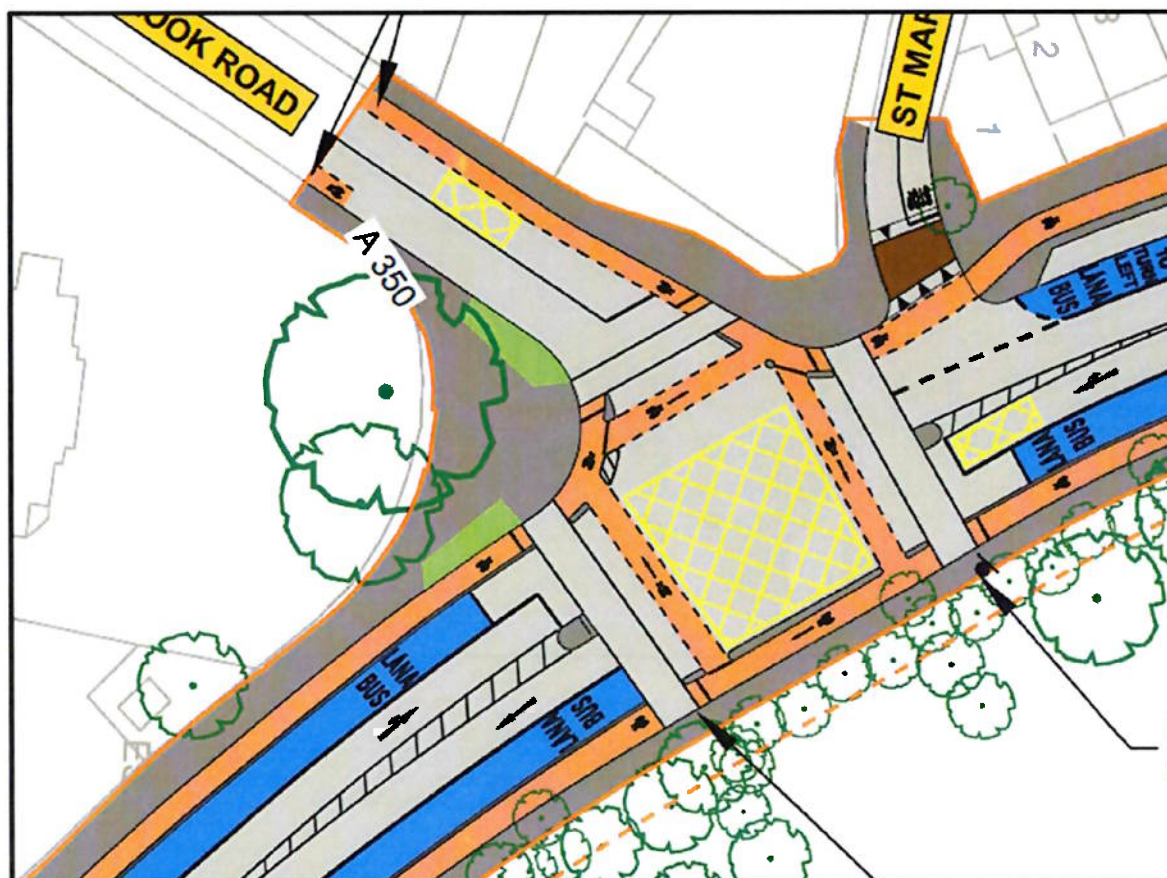
The bus stop on Rathfarnham Wood is being retained with the cycle track running in front of the bus shelter. It is far safer when the option is available to run cycle tracks behind bus shelter as it removes potential conflicts between cyclists and disembarking bus users. We would request that the bus shelter be moved closer to the road in the drawings on sheet 01/42 and the cycle track ran behind the bus shelter instead.



Grange Road/Willbrook Road junction

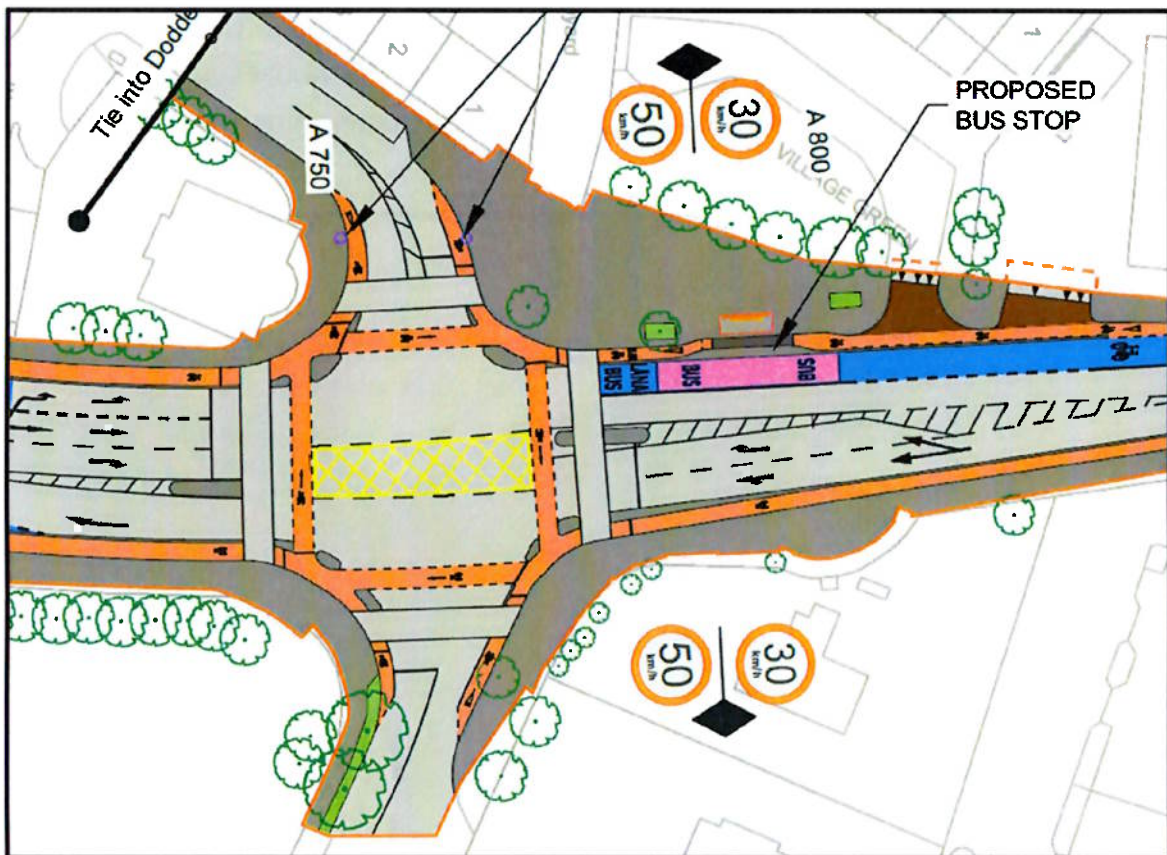
It appears that the bicycle lane on Willbrook Road is not complete from Grange Road and ends just after the junction, only to be reconnected slightly further down the road. There does not seem to be any physical reason in terms of road width at this junction for

forcing cyclists to interact with cars. This could lead to conflict between bicycle users and cars turning left onto Willbrook Road across the bus lane. We would suggest that the cycle lane continue past the junction on Willbrook Road, connecting with the existing infrastructure.



Rathfarnham Road/Main Street junction

At the junction of Main Street and Rathfarnham Road (sheet 03/42), it is proposed that a bus stop be installed with a cycle track running in front of the shelter. As we previously mentioned, it is far safer to run the cycle track behind the bus shelter. As there is the available space to do so at this proposed stop, we would recommend that the bus shelter be brought forward and the cycle lane run behind to avoid potential conflicts between disembarking bus users and cyclists. The width of the island at this bus stop is also too narrow.

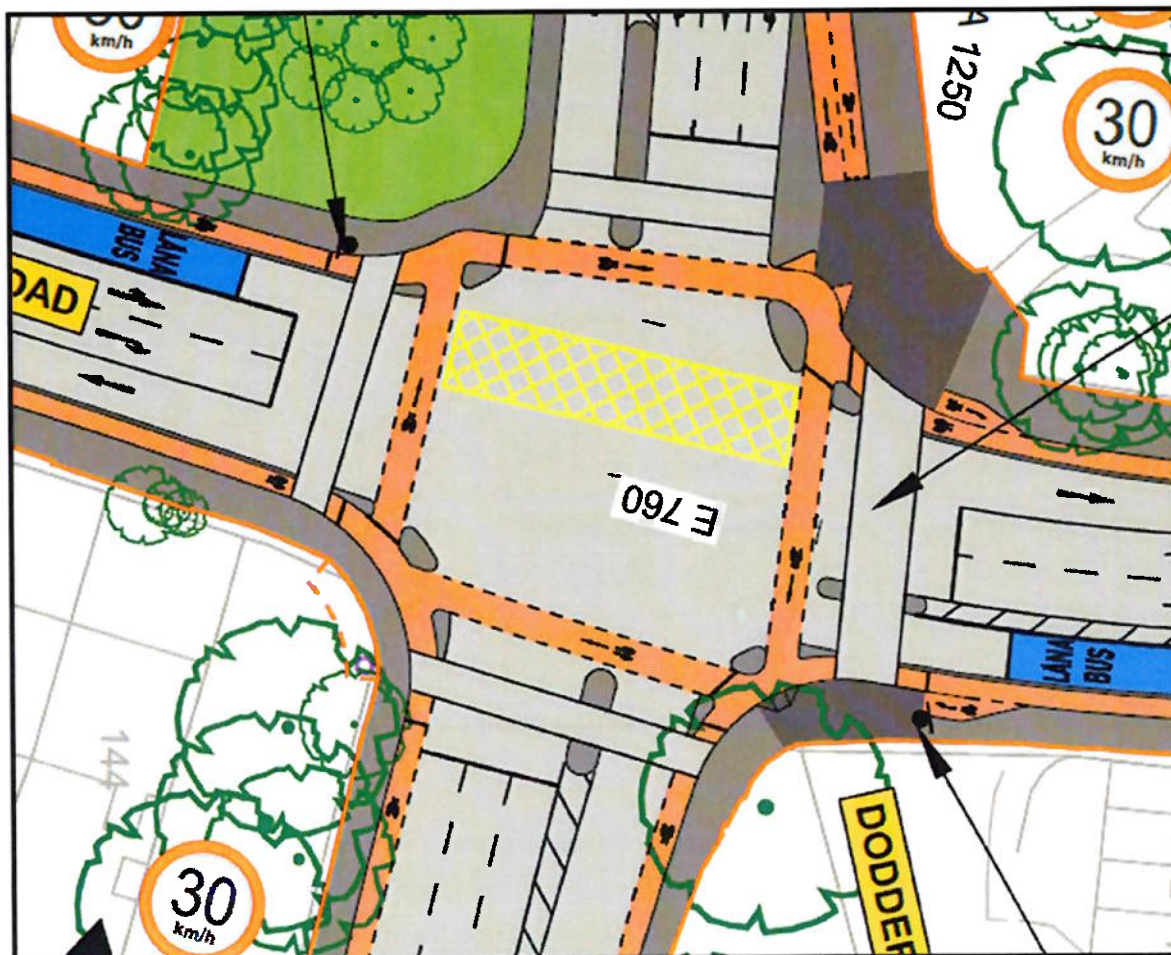


Rathfarnham Road/Dodder Park Road junction

Given that there are three lanes of traffic on both sides of Dodder Park Road (sheet 04/23), we would request that priority signals be installed for cyclists at the junction. It is important to allow cyclists to fully clear the junction before left turning traffic arrives to make the turn. This could be mitigated by upgrading to a Dutch-style junction as mentioned above.

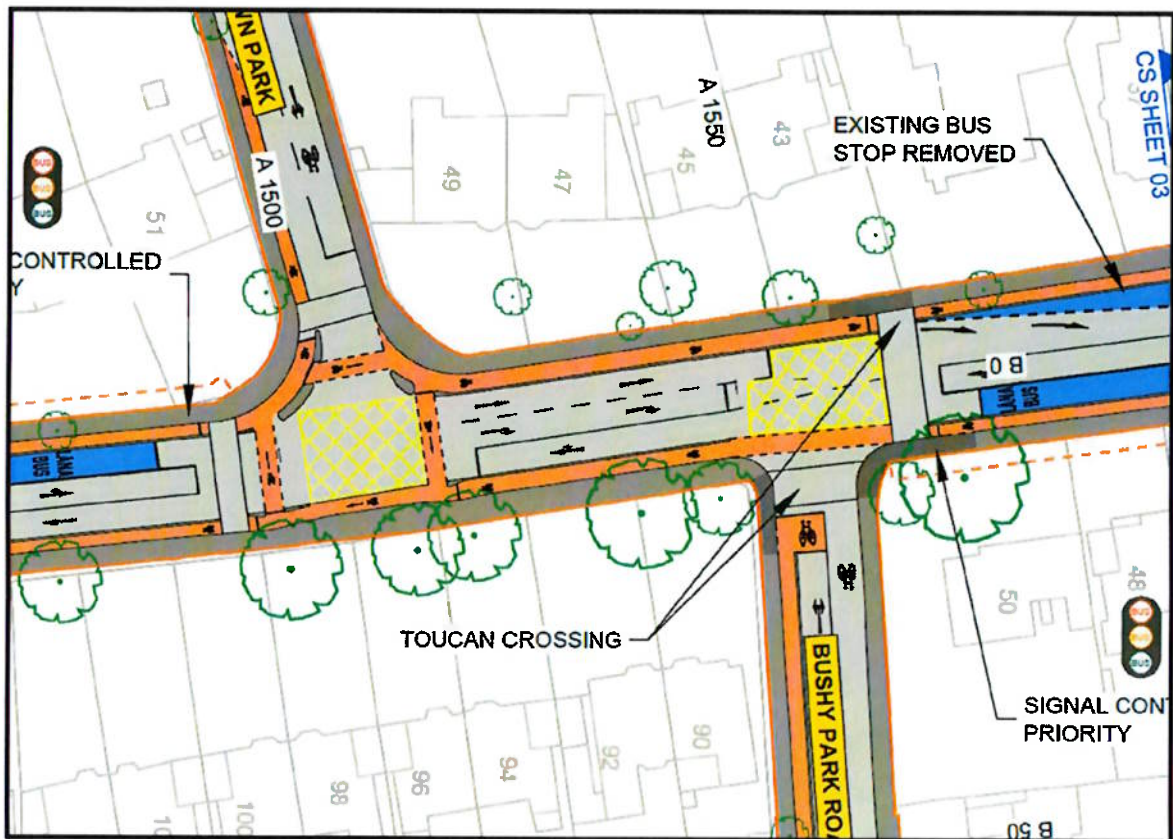
Additionally, there appears to be a shared space areas for pedestrians and cyclists. This would likely lead to conflict between faster moving cycle traffic should cyclists have the green light at the junction while creating a separation from cars who may have the filter lane turn left. We would recommend creating clear segregation between the cycle tracks

and pedestrian footpaths to reduce potential conflicts between both cyclists and pedestrians & cyclists and vehicles at the junction.



Rathdown Park/Rathfarnham Road junction

It appears that at the junction of Rathdown Park and Rathfarnham Road (Sheet 05/42), that there is no pedestrian crossing on the eastern arm of the junction despite there being a cycle crossing. This forces pedestrians to make an additional unnecessary crossing to get across the road and we would highly recommend installing a pedestrian crossing alongside the cycle crossing on the eastern arm.



This effectively forces pedestrians who may be coming from Bushy Park Road on the western side and want to get to the eastern side of Rathdown Park to make an additional crossing to get around the 'staggered' junction. It is not appropriate to prioritise vehicles over more vulnerable road users, especially considering Rathdown Park is supposedly a quiet street area, yet is designed to enable vehicles over pedestrians in the current design.

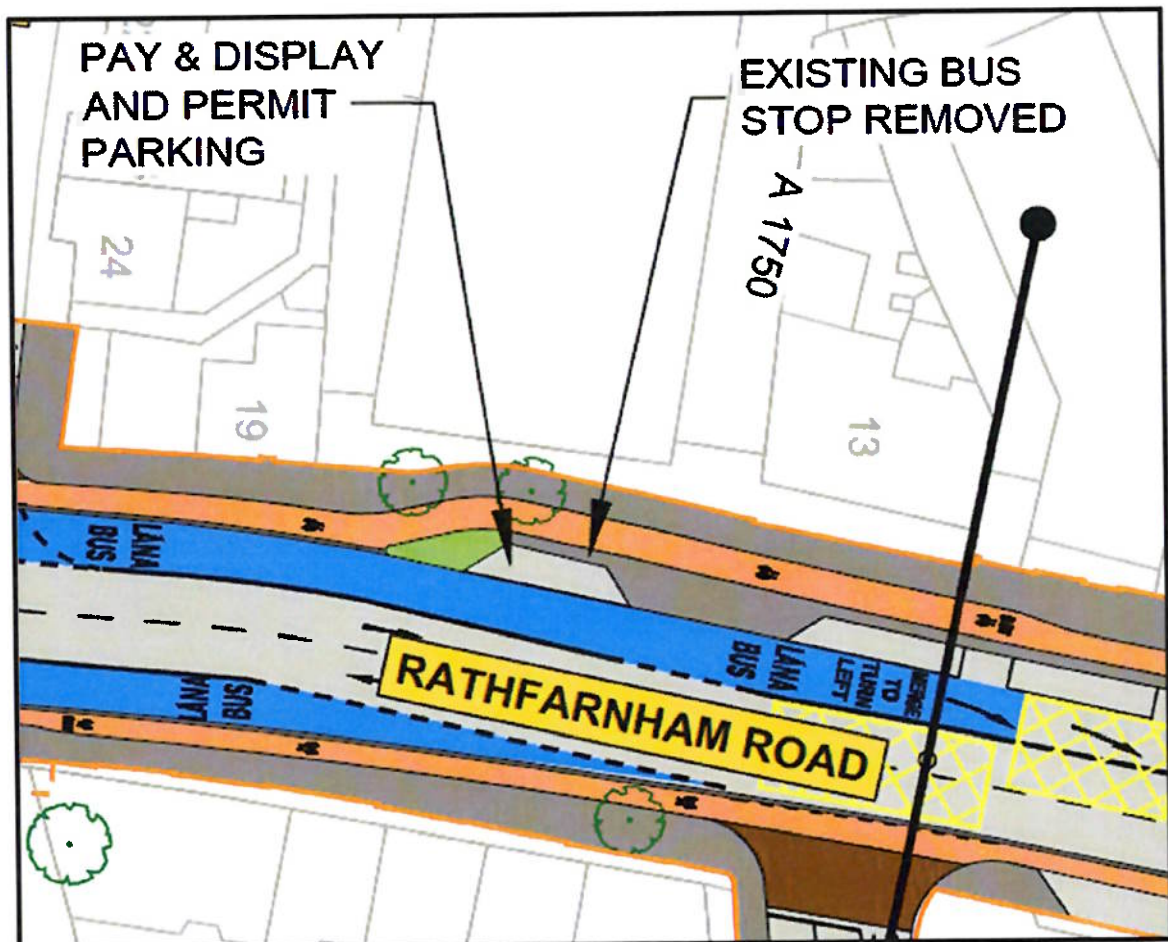
Fergus Road modal filter

We would like to see a modal filter on Fergus Road to discourage rat-running to and from Templeogue Road. This would be a clear quality of life improvement for the residents of Fergus Road and allow cyclists to avoid the much busier junction at Terenure which could reduce the conflicts with faster moving vehicles at a complex junction. This would be especially prudent as the busiest section on Terenure Place, which links both a crossroad

and a Y-junction, doesn't have segregated cycle lanes. Providing an alternative route for cyclists through Fergus Road via the introduction of a modal filter could be quite significant for the parents of children in St. Joseph's School and residents

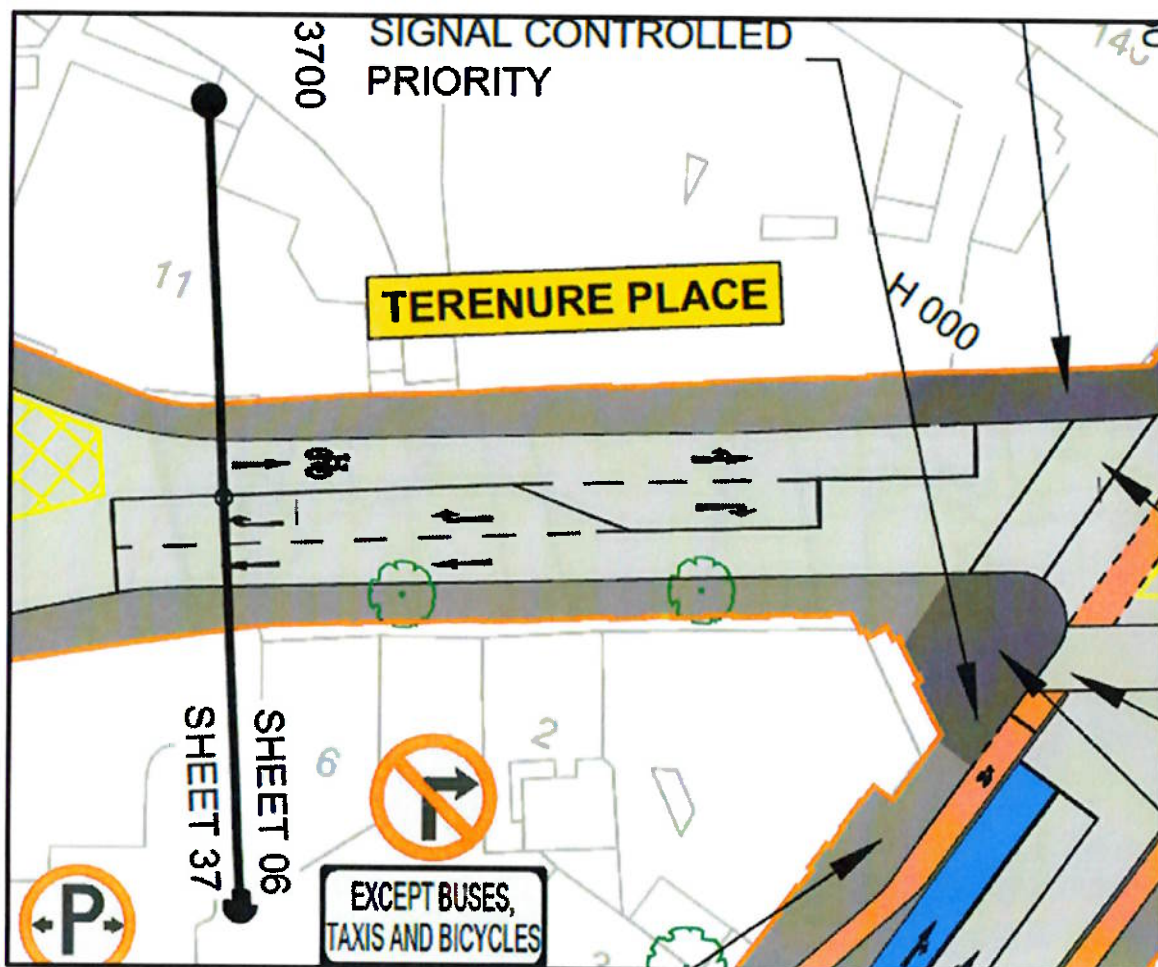
New pedestrian crossing at Beechlawn Way

Considering Beechlawn Way is the entrance to both Lidl and St. Joseph's School, it would be appropriate to install a new pedestrian crossing across Rathfarnham Road, whilst also raising the footpath across Beechlawn Way to prioritise pedestrians.



Cycle lanes on Terenure Place & Terenure Road East

It appears that the current drawings do not include the existing cycle lanes on Terenure Place and at Terenure Road East. We would be against removing them if this is the proposal and not an oversight. Whilst painted lines on a shared road is the worst form of cycle lane, at the very least, it creates a clear demarcation between vehicles and cyclists.

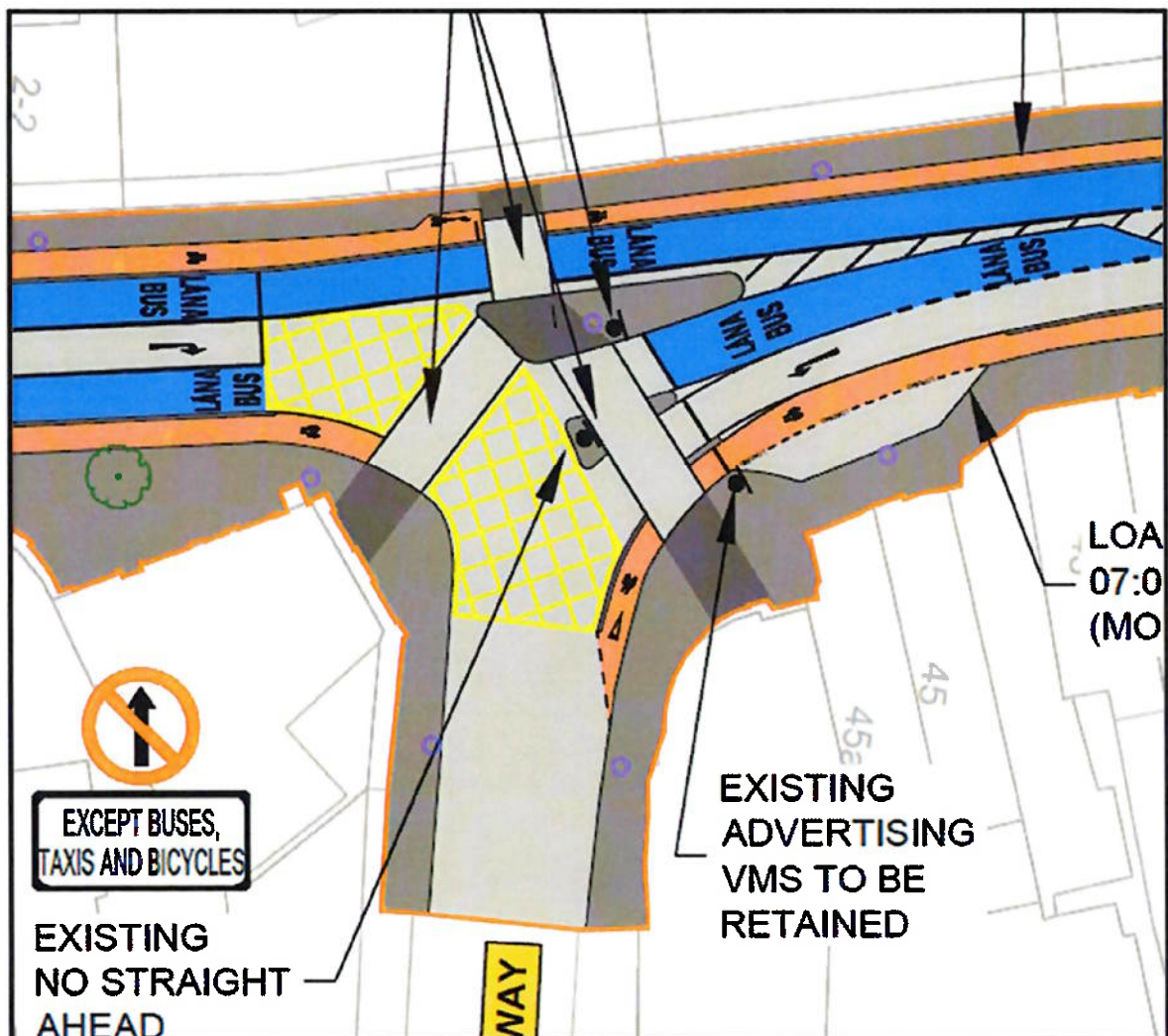


We would ask the designers to re-visit these plans and ensure that the existing cycle lanes on Terenure place are not removed and update the drawing to reflect them.

Terenure Road East/Aldi Entrance

We request that the applicant implement a continuous footpath at the entrance to Aldi on Terenure Road East in order to prioritise pedestrians over vehicle users who may be entering / exiting the Aldi car park.

Camden Street Upper - Charlotte Way Junction

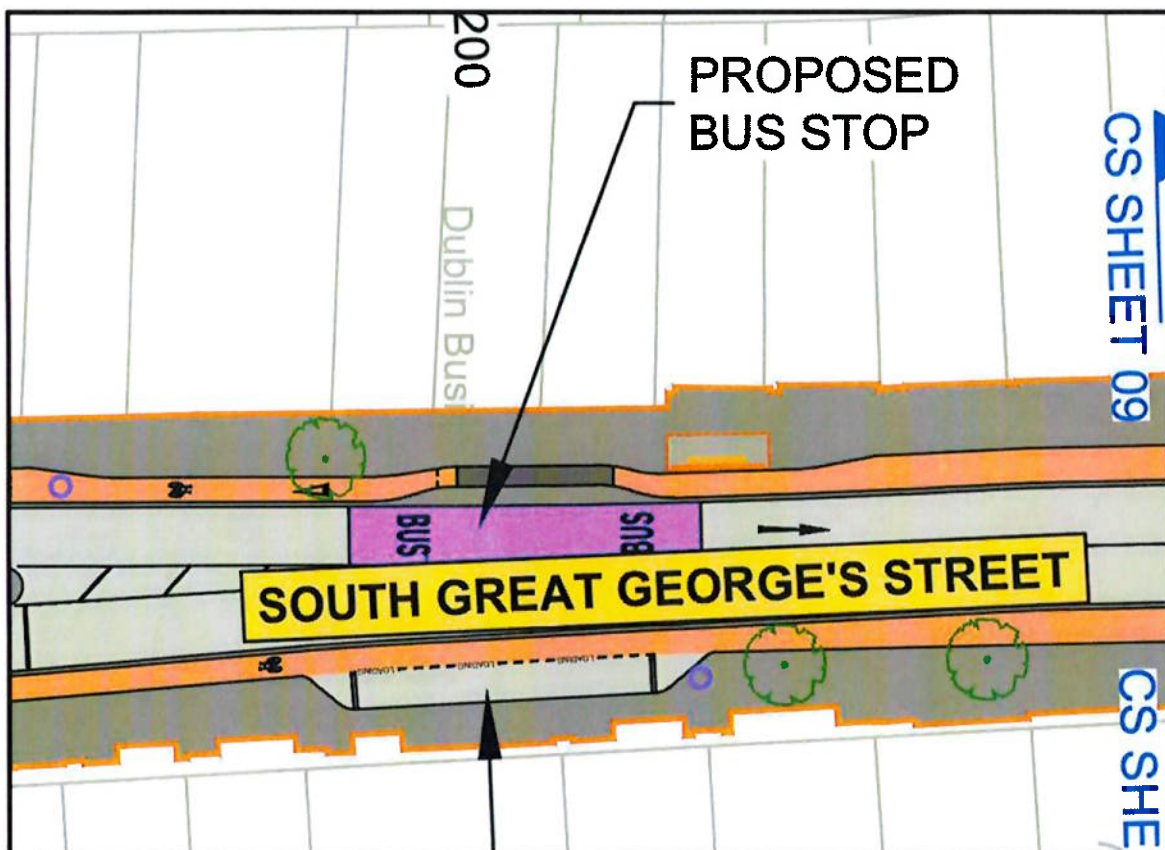


Pedestrian islands should be avoided where possible, it would seem far more prudent to adjust this junction, making a traditional T-junction. This would prioritise pedestrians

allowing them to make the crossing in a single journey, rather than being forced to wait at a pedestrian island no matter which way they go.

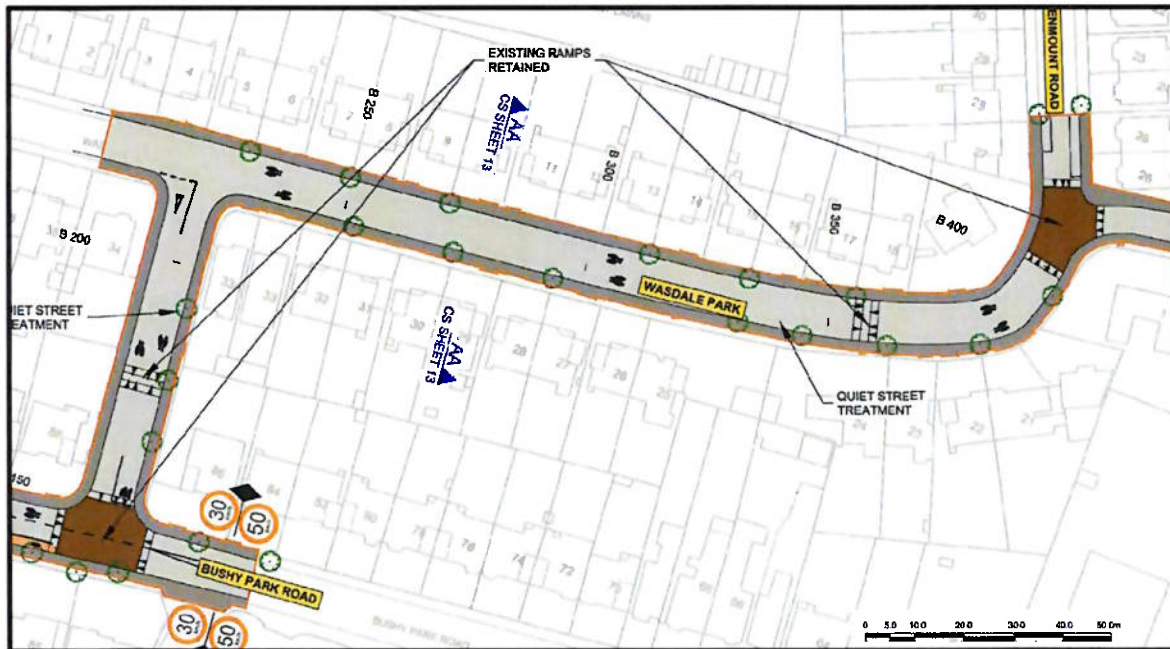
South Great George's Street Bus Stop

The placement of the bus shelter on South Great George's Street (sheet 18/42) does not align with the pedestrian island to disembark from the bus. There is a possibility that pedestrians might walk through the cycle track, rather than up and around the traffic island where cyclists are likely to be waiting, increasing the chances of a conflict. We would recommend making adjustments to the plans to align the bus stop with the traffic island to avoid this potential conflict point between cyclists and pedestrians.



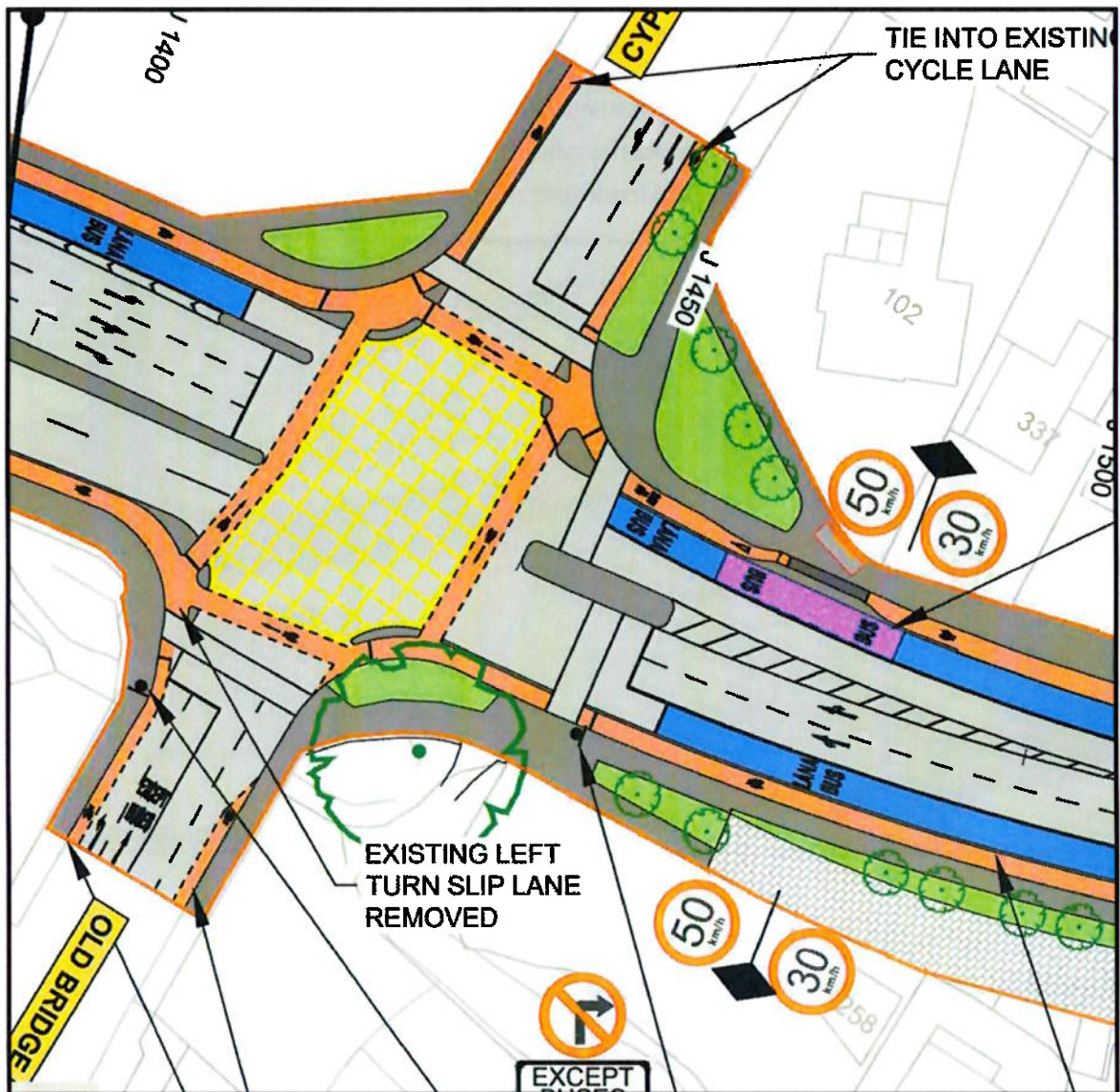
Bushy Park Quiet Neighbourhood

There is a risk that vehicles will not adhere to the 30kph speed limit. We would request the installation of chicanes and other traffic calming on this section to slow down vehicles, reduce rat-running and create the environment needed for a safe quiet street detour.



Templeogue Road/Old Bridge Road

The absence of crossings on all arms of this major junction (sheet 32/42) is a significant oversight that should be corrected. We insist on installing a pedestrian crossing to ensure people can cross safely across six lanes of traffic. As it's designed, a pedestrian on the North-west corner would need to wait at four light sequences to get to the South-west junction and have potential conflict with cyclists at five separate points.



Templeogue Road quiet street

It would be preferable to see better road markings or signage indicating the crossing for East-Bound active travel users so cyclists don't end up in dead-ends (sheet 36/42). Additionally, we would like to see more traffic calming measures within the quiet street area to ensure drivers share the space safely.

