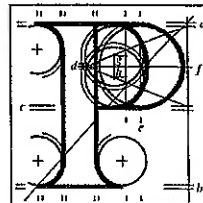


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Dublin Cycling Campaign
c/o Taylor's Hall
Back Lane
Dublin 8
D08X2A3

Date: 16 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 Cycling Campaign

% Tailor's Hall

Back Lane

Dublin 8

D08 X2A3

15th August 2023

Templeogue - Rathfarnham to City Centre Core Bus Corridor

(Case: 316272)

1.0 Introduction

Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. Dublin Cycling Campaign is a member group of Cyclist.ie the Irish Cycling Advocacy Network, which is in turn the Irish member of the European Cyclists Federation (ecf.com). 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.

We have been engaging with the applicant, National Transport Authority, through all stages of this project including the multiple rounds of public consultation, community forums, and through one to one meetings.

We are supportive of this project from Templeogue and Rathfarnham to Dublin City Centre, though do request a few minor modifications via condition.

We request an Oral Hearing to discuss the issues raised below, and in the Appendix attached (which contains observations based on specific locations).

2.0 Achieving National Mobility Policy Targets

The goals of the National Sustainable Mobility policy are a 51% drop in transport emissions by 2030, and 500,000 additional daily active travel and public transport journeys. This will require a significant modal shift.

This modal shift will only happen with two elements:

- There is a suitable environment for people of all ages and abilities to cycle
- There is comparative advantage for active travel / public transport modes over private car traffic

The typology 'Four Types of Cyclist' by Dr Jennifer Dill, Professor Urban Studies & Planning, is useful for determining what level of suitable cycling environment is necessary to enable people to cycle. It divides people into four cohorts:

- Strong and Fearless (4-7%): will cycle in any conditions no matter how hostile. They will mix in all traffic types with no cycling infrastructure.
- Enthused and Confident (5-9%): They will mix with some traffic. They require some infrastructure. Most people who currently cycle in Dublin are in this cohort or in the 'Strong and Fearless' cohort.
- Interested but Concerned (50-60%): will only cycle if provided with high-quality safe and comfortable cycle routes. Will only comfortably mix with low levels of traffic in intentional low speed environments.
- No Way, No How (25-33%): unlikely to ever cycle no matter the conditions

The proposed scheme needs to ensure the needs of the large 'Interested but Concerned' cohort are met so as to provide the modal shift necessary to fulfil the goals of the National Sustainable Mobility Policy.

3.0 Universal Design

Dublin Cycling Campaign makes the present submission subject to Universal Design, and urges the NTA to ensure all works are compliant with Universal Design principles to ensure access for disabled cycling and 'non-standard' or adapted cycles, as well as access for disabled pedestrians and passengers (walking and wheeling).

As defined by the National Disability Authority (NDA) and the Centre for Excellence in Universal Design (CEUD), the seven principles of Universal Design are:

1. Equitable Use
2. Flexibility in Use
3. Simple and Intuitive Use
4. Perceptible Information
5. Tolerance for Error
6. Low Physical Effort
7. Size and Space for Approach and Use

(See: <https://www.universaldesign.ie/what-is-universal-design/the-7-principles/>)

4.0 Welcome Design Interventions

We are supportive of a number of the modified elements of the proposed scheme including:

- The introduction of a Bus Gate in Rathmines and segregated cycle tracks through Rathmines Village
- Removal of Owendoher and Brookvale elements of the previous routes proposed in CBC 12 Round 3 and instead introducing cycling facilities along the main CBC corridor.
- Improved Island Bus-stops along the scheme, which provide greater protection for bus passengers and greater safety for cyclists.
- The conversion of the Spawell roundabout to a signalised junction and, on the R137 at J1000, the locating of the footpath to the back of the stone arch and the cycle track to the front of it.
- The introduction of cycle facilities on Terenure Road North and Harold's Cross Road

5.0 Elements of the Scheme for Consideration

The points listed for 5.1 - 5.5 relate to the overall characteristics of the scheme which we believe need to be addressed. In addition to these points we have included specific design suggestions in Appendix One attached; this is a listing of all further recommendations and suggestions with respect to particular locations within the scheme.

5.1 Cycle Track Widths

Throughout the scheme we see a variation in the proposed widths of the cycle tracks. As per the current National Cycling Manual (NCM) guidelines we would expect that all cycle tracks be a minimum of 2.0 m. At this width this allows

overtaking of regular cycles and also will accommodate larger cycles such as tricycles and cargo bikes.

As per the cross-sections provided the proposed areas which would have cycle tracks of less than 2.0 m are:

- Rathfarnham Road
- Rathgar Road
- Camden Street Lower

We believe that any cycle track proposed to be constructed at less than 2.0 m is not being built for the envisaged future capacity. The electoral constituency of Dublin South West to which the outer realms of this scheme largely caters for has a population of 150,902¹. As the evolution of e-mobility including e-bikes continues to unfold, the infrastructure being put in place should have the capacity to cope with increased demand, and as such the width of the cycle tracks should be maximised to accommodate this modal shift.

In addition, stated dimensions on cross-sections include the width of permanent separator kerbs, but no dimensions are provided for these kerbs. If constructed to comply with the [National Cycle Manual](#) as currently drafted, permanent separator kerbs would be 0.25m. This width is required to be additional to the prescribed track width (dimension 'B' in NCM). Therefore cycle track widths, though quoted as 1.5m on cross sections, in fact have a usable central width of 1.25m.

The National Cycle Manual permits 1.5m as an 'absolute minimum' where cycle numbers are less than 300 per hour.

5.2 Cycle Track Continuity

A cycle route is only as good as its weakest link. The plans show gaps in cycle tracks on Rathfarnham Road (Sheet 4) and Templeogue Road (Sheets 32-33) in order to provide short sections of bus lane.

We suggest the scheme would be improved by providing a continuous cycle track (which prioritises safety) over providing short sections of bus lane (which merely improves journey times).

5.3 Filtered Permeability

Towards the city centre the utilisation of filtered permeability is a welcome approach such as those proposed on Mountpleasant Avenue Lower and Lennox Street.

¹

https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2020/2020-02-09_dublin-south-west-constituenncy-profile_en.pdf

However in the outer parts of the scheme the reliance on signage and enforcement is the adopted approach. To avoid the requirement for enforcement we would propose that throughout the scheme, such as the areas (but not limited to) Rathdown, Wasdale Road, Greenmount Road and Fortfield Road, filtered permeability be utilised. This engineering solution will negate the possibility of 'rat-running', will improve traffic calming in the area, and improve the environs for residents.

This would align with DMURS guidance,

Filtered Permeability Networks, which restrict universal permeability, may be applied where designers are seeking to prioritise the movement of more sustainable modes (i.e. pedestrians, cyclists and public transport) over private vehicles. For example bus gates and other measures, may also be used to prioritise bus movements, particularly in Centres (see Section 3.4.3 Bus Services). The limited use of vehicular cul-de-sacs may be considered in Neighbourhoods and Suburbs where there is a particular concern regarding through traffic.'

5.4 Quiet Street Treatment

Throughout the scheme there is deployment of the concept of 'Quiet Streets'. However it is not clear what engineering elements are being deployed to harness the environment of a 'Quiet Street'.

For example Rathdown Drive is heavily trafficked at the weekend due to the proximity of Bushy Park and there is a considerable amount of parking (including illegal parking).

In addition the proposed quiet street of Wasdale Park has a cross-section width of 8.5 m for the two traffic lanes. This is in contravention to the DMURS guidance for Shared street surfaces that states 4.8m.

To ensure the concept of a 'Quiet Street' is deployed and successful we propose that engineering designs are utilised to reduce the width and speed of the carriageway to make it a safe and comfortable route for cyclists as well as denoting that cyclists should have priority.

The Dutch guidance for such a street (as per CROW Design Manual for Bicycle Traffic) outlines some of the following implementations and considerations:

- The colour of surfacing red (to make cycle route recognisable)
- No marking on the carriageway

- Width of vehicle path 4.5m
- Safe for cyclists
- Comfortable for cyclists
- Clear to motorists that there is a cycle route

For the entire Bus Connects program we would suggest that Quiet streets are given a distinct uniform surfacing to denote their purpose. In addition we would suggest that parking is limited and when provided is designed in such a way to protect the cyclist. Interventions such as build-outs, perhaps accommodating trees, could be used to further cultivate a 'Quiet Street' environment.

5.5 Speed Limits

We warmly welcome the further roll-out of 30 km/hr speed limit within this scheme. It is not clear from a legislative perspective how this will be executed given speed limit changes are currently under national review and are in the remit of local authorities.

In addition we have concerns about the requirement for enforcement and for this reason request that driver behaviour with respect to speed limits is cultivated through engineering design.

The following excerpts from DMURS outline this requirement. For this reason we expect that DMURS is adhered to rather than the reliance on enforcement with respect to speed management.

'The speed at which drivers travel is principally influenced by the characteristics of the street environment

If the design of a street creates the perception that it is safe to travel at higher speeds drivers will do so, even if this conflicts with the posted speed limit

Integrated approaches incorporate elements of urban design and landscaping that instinctively alter behaviour, thus reducing the necessity for more conventional measures (such as physical barriers and the road geometry) alone to manage behaviour. The attraction of this approach is that it creates a new dynamic and a 'win-win' scenario where:

- *Street networks are simpler in structure (more legible) with higher levels of connectivity (more permeable) thus reducing travel distances.*
- *Higher quality street environments attract pedestrians and cyclists, promoting the use of more sustainable forms of transport.*

- *Self-regulating streets manage driver behaviour and calm traffic, promoting safer streets.'*

6.0 Conclusion

In conclusion, Dublin Cycling Campaign:

- Supports the Templeogue / Rathfarnham Scheme;
- Requests alterations to some elements of the design to ensure reduced speeds, utilisation of filtered permeability, formalise the concept of Quiet Streets and ensure appropriate cycle track widths;
- Requests an oral hearing on this application.

Ellen Cullen

Chairperson, Dublin Cycling Campaign

Appendix 1.0

The following observations are proposals which we believe should be considered as this Bus Connects Corridor progresses to the detailed design phase.

We submit that the majority of these points should be dealt with by condition attached to any grant of planning permission.

Sheet 01 – Nutgrove Avenue – Rathfarnham Wood

- The Campaign has commented at length, particularly in previous BusConnects submissions, on safety aspects of the junction design at Grange Road. Combining straight-ahead cyclists with left-turning motor vehicles on the same green light phase, as here, presents a grave risk. We request An Bord to require the applicant to revise junctions to Dutch or Cyclops designs.
- Cycle track widths are minimal, being 2.0m at most, including the unusable width of the raised permanent separator kerbs;

Sheet 02 – Rathfarnham Road past Yellow House

- Junctions must be redesigned to safer configuration, as above.
- Butterfield Ave - says linking into existing scheme - we are unaware of any scheme proposed here.

Sheet 03 – Rathfarnham Road

- It is disappointing to see that there is no inbound cycle lane from Rathfarnham Village;
- 30 km/h for this section – how will that be enforced?

Sheet 05 - Rathdown Park and Bushy Park Road

- Quiet Street treatment needs additional measures, as set out above;
- Similarly, the design encourages cyclists to use Bushy Park Road and no southbound protected facility for people on bikes is proposed, while speeds of motorists are likely to be high (straight unobstructed carriageway; poor enforcement). Protected junctions to join or exit Bushy Park Road would ameliorate.

Street. We suggest that Richmond Row should also be closed to stop rat-running through Portobello and turning traffic at a very busy junction for pedestrians and cyclists due to the paths for both along the grand canal. We note that Dublin City Council are proposing closing Richmond Row as part of their regeneration of Portobello Harbour. The Campaign has made a submission expressing concerns regarding the shared-surface approach taken in initial designs.

Sheet 15 – Camden Street and Charlotte Way

- Cycle track widths are inadequate, being 2.0m at most, including the unusable width of the raised kerbs;
- Converting Lennox Street to a cul-de-sac will provide a substantial improvement for cyclists heading westwards along this road;
- The Charlotte Way junction presents a complex crossing for pedestrians and cyclists. Provision for outbound cyclists on Camden Street Lower to go straight up Camden Street Upper (to the right of the Bleeding Horse pub) is inadequate. Although no pocket/ jug is shown, this manoeuvre appears to require stopping near the advertising VMS, sharing space with pedestrians, waiting for one toucan crossing to turn green, crossing the outbound carriageway of Camden Street Lower, then twisting around more than 90° and waiting for a second toucan crossing signal, before a sharp right turn onto the Camden Street Upper cycle track. Is it not possible for straight-ahead cyclists to share the bus lane (perhaps using an ASL) at this location?
- There is an unnecessary left-turn lane from Harcourt Road to Richmond Street South. Furthermore, just before the junction there is a road that acts as a slip lane for the same route. Suggest the left turn lane is removed as left turning traffic can filter out of the forward lane, and the slip lane closed to through traffic. If the slip lane is retained it needs a crossing at the junction with Harcourt Road. Currently, motorists tend to take this corner at high speed.

Sheet 16 – Camden Street

- Cross-Section P - P appears to have a lack of consistency in cycle lane widths. Inbound and outbound cycle lane widths appear and scale equally on GA drawings, but are differently dimensioned on P - P;
- There is a 4.5m footpath inbound, but cycle track only 1.75m; approx. 1.3m usable width outbound. This is inadequate for such a busy route;
- Why is there 1.5m cycle track (including unusable kerb width) and 0.8m buffer outbound?

Sheet 06 – Terenure Village

- No cycle tracks on Terenure Road East or West as set out above;
- Removal of slip lanes is a positive step. Slip lane for cyclists from Terenure should be considered.

Sheet 07 – Rathgar Village

- Location of proposed bus stop (inbound) very close to junction;
- Pay and display parking on both sides of road - there is a risk of dooring cyclists;
- We welcome to provide cycle tracks to both sides of Orwell Road.

Sheet 12 – Rathmines

- Local Access – 6:00-20:00 Monday to Sunday – What is the definition of local access and how will this be enforced? Does this encompass access to St Mary's School?

Sheet 14 - Richmond Street South and Rathmines Road Lower

- The creation of a part-time bus gate along Rathmines Road Lower is a positive step;
- The addition of bypassed bus stops is welcome;
- Cycle track widths will rapidly prove inadequate even in lower modal shift scenarios, being 2.0m at most, including the unusable width of the raised kerbs. Peak hours already see congestion in cycling facilities across LaTouche Bridge and along Rathmines Road Lower, despite the low existing quality of service for cycling;
- Raised crossing markings are not shown at the junctions with Blackberry Lane and Grove Road;
- The added widths of cycle tracks and turning lanes at the La Touche Bridge are to be commended;
- However the unprotected cycle lanes through the junction between Grove Road and Rathmines Road Lower fail to provide an adequate quality of service. Although public-service vehicles only will be using the junction between 6am and 8pm, the lack of segregation for cyclists provides a hostile environment, and represent a weak link in this very important route;
- The filtered permeability at the junction of Lennox Street with Richmond Street South is welcome. Currently Lennox Street is used as a rat-run by motor traffic trying to avoid the junction with Harrington

- The jug/ pocket turn to Grantham Street, combined with toucan crossings, is inadequate.

Sheet 17 – Camden Street to Aungier Street

- Cycle track widths are inadequate, being 2.0m at most, including the unusable width of the raised kerbs;
- The removal of slip turns at the Kevin Street junction will substantially improve the pedestrian and cyclist experience.

Sheet 18 – South Great George’s Street and small part of Aungier Street

- This is one of the busiest cycle links in the country;
- Cycle lane widths are minimal, being approx. 1.8m. at most (indicated 2.0 minus kerb);
- The presence of 3 loading bays on South Great Georges Street and one on Aungier Street – some of which turn into taxi ranks at night – on the footpath side of cycle lanes makes a hostile passing-point for cyclists;
- The use of shared space/ toucan crossing at junction with Stephens Street Lower is substandard (though cyclists using the footpath/ shared space here will be few);
- Standard bus shelter designs leave little space on footpaths for pedestrians in city-centre locations such as this.

Sheet 19 – Terenure Road North

- No bus stop bypass at one inbound bus stop

Sheet 24 - Wasdale Park

- Filtered permeability could be utilised in Wasdale Park to truly cultivate a quiet street environment as well as negate the requirement for plates. Given this is intended to be a quiet street for cycling we would recommend the removal of the ramps.

Sheet 25 – Zion Road

- We welcome the Slip lane removal but it would be preferable for the slip lane to be retained for cyclists.

Sheet 28 & 29 - There are currently desire lines on the southern side of the R137 and pedestrians are seen using the petrol station. It is disappointing to not have further pedestrian and cycle infrastructure provided especially given the connection further on connecting into the M50 underpass scheme.

Sheet 30 - R137 - Spawell junction.

- We gladly welcome the junction replacing the roundabout. However if there are separate cycle / pedestrian crossings the junction waits will be very long and they are currently unacceptable even with toucan crossing timings.

Sheet 31 - R137 Templeogue Road

- The cycle track widths get very narrow at the bus-stops.
- Given the speed of the road and its proximity to M50 it would be preferable to have buffer between the cycle tracks and carriageway.

Sheet 32 - R137 Templeogue Road

- Templeogue Bridge junction needs Dutch geometry to ensure it is a fully protected junction. There appears to be no continuous cycling infrastructure provided on the southbound lane of the Old Bridge Road and this is an important link for the Southern connection of the Ballyroan/ Knocklyon and Firhouse areas as well as connectivity to the Dodder Greenway.
- Currently, on the southern side of Templeogue Road, this is shared space. Is this being removed? If so further segregated protected cycling infrastructure should be provided.
- Cycle tracks stop before Village

Sheet 33 – Springfield Road, Templeville Road, R137

- The cycle tracks widths are only 1.5m wide, with 4.4m footpath on one side so more equitable distribution should be considered.
- The junction should be upgraded to a fully protected Dutch style or cyclops junction.

Sheet 35 - Rathdown Drive

- There is currently excessive parking on Rathdown drive, and ramps are not preferable for cyclists. We suggest true quiet street treatment is provided as outlined within Section 5.4 above.
- Given there is Lots of green space to create cycle track

Sheet 36 - Rathdown Crescent

- The roundabout at Rathdown Crescent and Park junction is superfluous - one arm serves only 2 or 3 houses.
- Reduction of speed limit to 30km/h is welcomed.

Sheet 37 - Terenure place presents a hostile environment for vulnerable road users. We request that An Bord require, by condition, consideration of removal of one of the general traffic lanes.

Sheet 38, 39, 40, 41 and 42 - Filtered permeability to comply with DMURS would provide better protection for vulnerable road users compared to turn-ban signage that necessitates active enforcement to be effective.