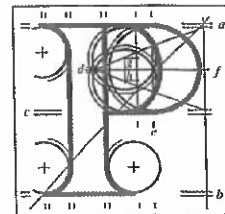


Our Case Number: ABP-317121-23



An
Bord
Pleanála

Brian O'Rourke
40 Shanglas Road
Beaumont
Dublin 9

Date: 12 September 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir,

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.

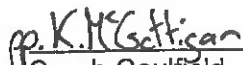
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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,



Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

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Swords to City Centre Core Bus Corridor Scheme

Busconnects Observation

Brian O'Rourke

40 Shanglas Road

Beaumont

Dublin 9

As a public transport user and a resident along the Swords Busconnects route I welcome this planned investment in our local bus service. However there are a number of outstanding issues within the proposal around pedestrian and cycle safety that need to be rectified before construction commences.

Collins Avenue/Swords Road junction

The proposed design for the Collins Avenue/Swords Road junction is completely unsuitable for an urban environment and goes against a number of guidelines set out in the Design Manual for Urban Roads and Streets (DMURS).

Under the proposed layout if a pedestrian wants to cross the Swords Road approaching from the north western corner of the junction crossing to the north eastern corner, they would have to cross 8 lanes of traffic. Crossing from the north western corner to the south eastern corner, 13 lanes of traffic. This is unacceptable in an urban area. One of these lanes is a slip lane coming from Collins Avenue to the west. DMURS states that these should be removed as they are 'highly disruptive to pedestrians' and provide little benefit to junction capacity.

DMURS also states that 'pedestrians should be able to cross the street in a single, direct movement and that staggered/staged crossings should not be used where pedestrians are active, such as in Centres, Neighbourhoods and Suburbs. Where staggered/staged crossings currently exist they should be removed as part of any major upgrade works'. They therefore should form no part of new plans but are included here because of the unreasonable width of the proposed road widening and additional lanes.

There is a university, two primary schools and three secondary schools within a 10 minute walk from this junction. There are three high density apartment developments in the process of being constructed within 300 metres of the junction - Hartfield Place, a DCC development beside the GAA pitch and housing for the elderly beside the church. The proposed design does not reflect the developed nature of the location and will greatly hinder pedestrian movement in this urban centre, particularly for the elderly.

The proposed design is hostile to pedestrians, does not prioritise their movement, damages the public realm and unnecessarily creates extra private vehicle capacity. The remit of Busconnects does not include adding additional capacity for general private traffic and such a move goes against the Transport Strategy for the Greater Dublin Area (2022-2042). According to the EPA (Urban air quality modelling of Dublin Final report, 8th July 2019) this part of the Swords Road is one of the worst

areas in the city for air pollution, pollution caused by vehicular traffic. Inducing more traffic will further deteriorate air quality which goes against the stated aims of the Climate Action Plan (2023).

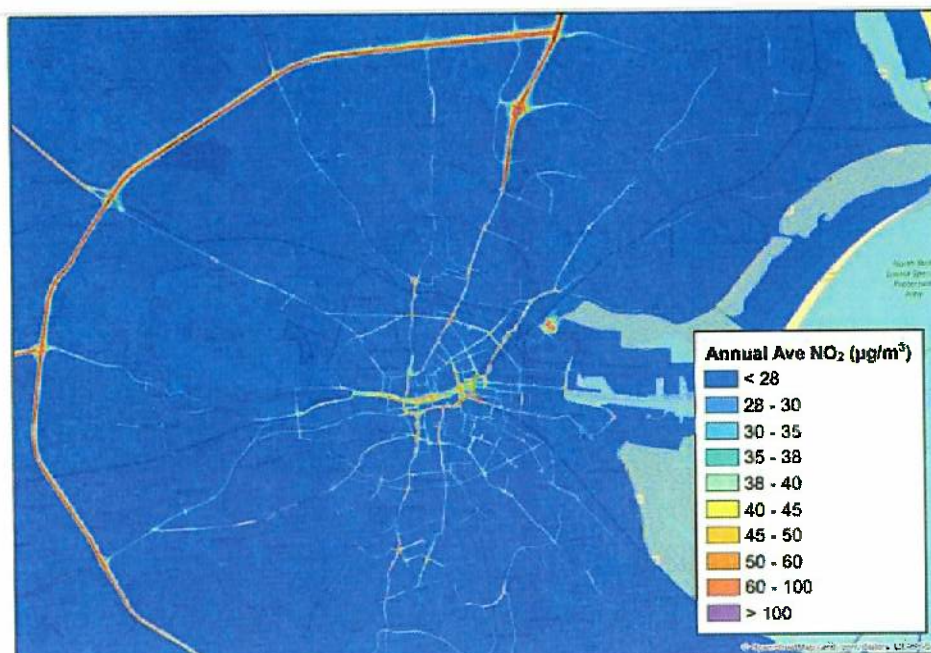


Figure 8.1: Modelled annual average NO_2 concentrations for 2015 ($\mu\text{g}/\text{m}^3$)

Swords Road & Drumcondra Road Cycle Lane

The width of the proposed cycle lane is not suitable for the section heading north outside Plunkett College, Sheet GA 27. The lane narrows from 2 metres to 1.7 metres. This section is uphill at a steep incline for 400 metres. The proposed width will provide no space to allow for overtaking and will dissuade older/slower cyclists from using the infrastructure. This could be remedied by expanding further into the college lands.

The proposed cycle lane heading north from the Clonliffe Road to Botanic Avenue includes 5 setback crossings. The proposal is for cyclists to yield to vehicular traffic at each crossing despite the cycle lane continuing straight, parallel with the Drumcondra Road. This is dangerous and goes against the guidelines for setback crossings set out in the NTA's Cycling Design Manual (2023). 'In terms of priority, the preferred arrangement is that cycle tracks continue with priority across side road junctions in urban areas on a raised crossing'.

The cycle lane will continue with priority across all other junctions along the route. This inconsistency is confusing and dangerous to vulnerable cyclists such as children. A child cycling could easily cross the crossing expecting to have priority - considering they do at all other junctions along the proposed route - only to be met by a left turning vehicle.

Urban Realm

As a condition of permission, where possible the use of Dutch kerbs should be used at house entrances to avoid unpleasant, undulating paths for pedestrians and those pushing prams.

Overall the proposal is very welcome but I am concerned that the benefits will not be transformative due to the fact that the current bus lane is very ineffective because there are many other vehicles in it. Camera enforcement and the removal of taxis from the proposed bus lane will be necessary to ensure public transport is not delayed by car traffic.

References

Design Manual for Urban Roads and Streets

https://www.dmu.ie/files/ugd/f378bf_583444499f9f4095aaa4d5e05c3cf4b2.pdf

Greater Dublin Area Transport Strategy

<https://www.nationaltransport.ie/planning-and-investment/strategic-planning/greater-dublin-area-transport-strategy/>

Urban air quality modelling of Dublin Final report, 8th July 2019

https://www.epa.ie/publications/monitoring--assessment/air/Technical_report_NO2_modelling_Dublin.pdf

Cycle Design Manual 2023

https://www.nationaltransport.ie/wp-content/uploads/2023/08/Cycle-Design-Manual_Sept.-2023_Low-Res.pdf