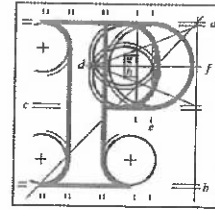


Our Case Number: ABP-317121-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Dublin Commuter Coalition
5 Abbeyfeild
Killester
Dublin 5

Date: 20 September 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords 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 mean time, 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.

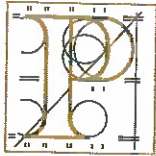
Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02

Tel	Tel	(01) 858 8100
Glaó 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



An
Bord
Pleanála

SID Online Observation

Online Reference

SID-OBS-001182

Online Observation Details

Contact Name
Feljin Jose

Lodgement Date
12/09/2023 15:28:03

Case Number / Description
317121

Payment Details

Payment Method
Online Payment

Cardholder Name
Feljin Jose

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐

Yes

☐

No

Request Emailed to Senior Executive Officer for Approval

☐

Yes

☐

No

Signed

EO

Date

Finance Section

Payment Reference

ch_3NpXZPB1CW0EN5FC1n32pOaA

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date



Dublin Commuter Coalition
5 Abbeyfield
Killester
Dublin 5

ABP case ref: 317121

BUSCONNECTS SWORDS 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 for drivers of private vehicles to understand the rules
- 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
- Maintaining Bus lanes 24/7 will support the increased use of public transport seen at weekends and evenings.

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:

- Pinnock Hill Roundabout (sheet 1)
- Airside Junction (sheet 3)
- Cloghran Junction (sheet 6)
- Green Long Term Car Park (sheet 9) — 3 and 4 stage crossings with slip lanes
- South Corballis Road (10)
- Old Airport Road (12)

- Turnapin Lane (15)
- Coolock Lane (18)
- Santry Ave (19)
- Omni Shopping Centre (20)
- Collins Ave (25)
- Griffith Ave (28)
- Clonliffe Rd (33)
- Whitworth Rd (33)
- North Circular Rd (34)
- Gardiner St Upper (34)

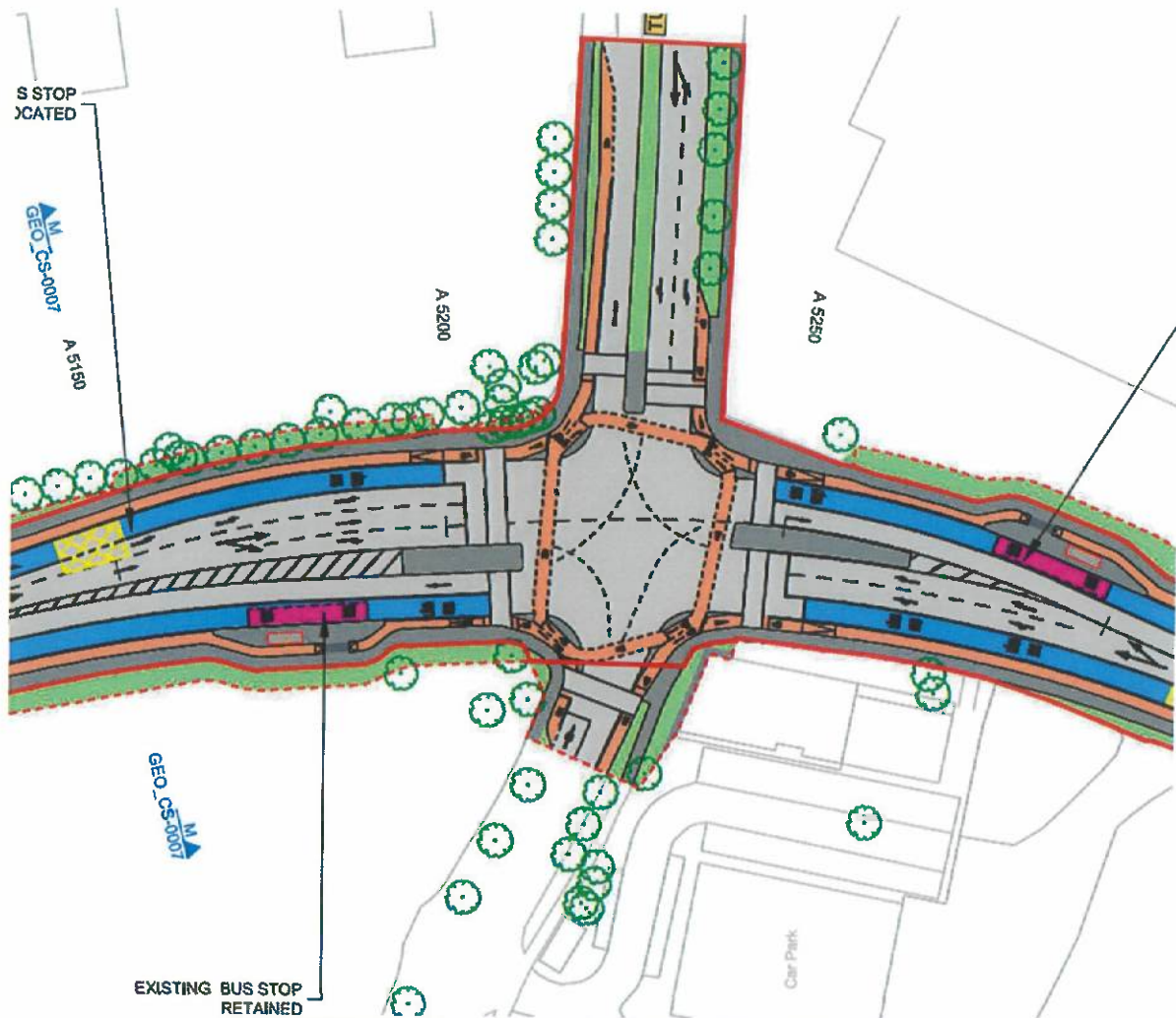


Figure 1 Example of two stage pedestrian crossings at Turnapin Lane

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”.

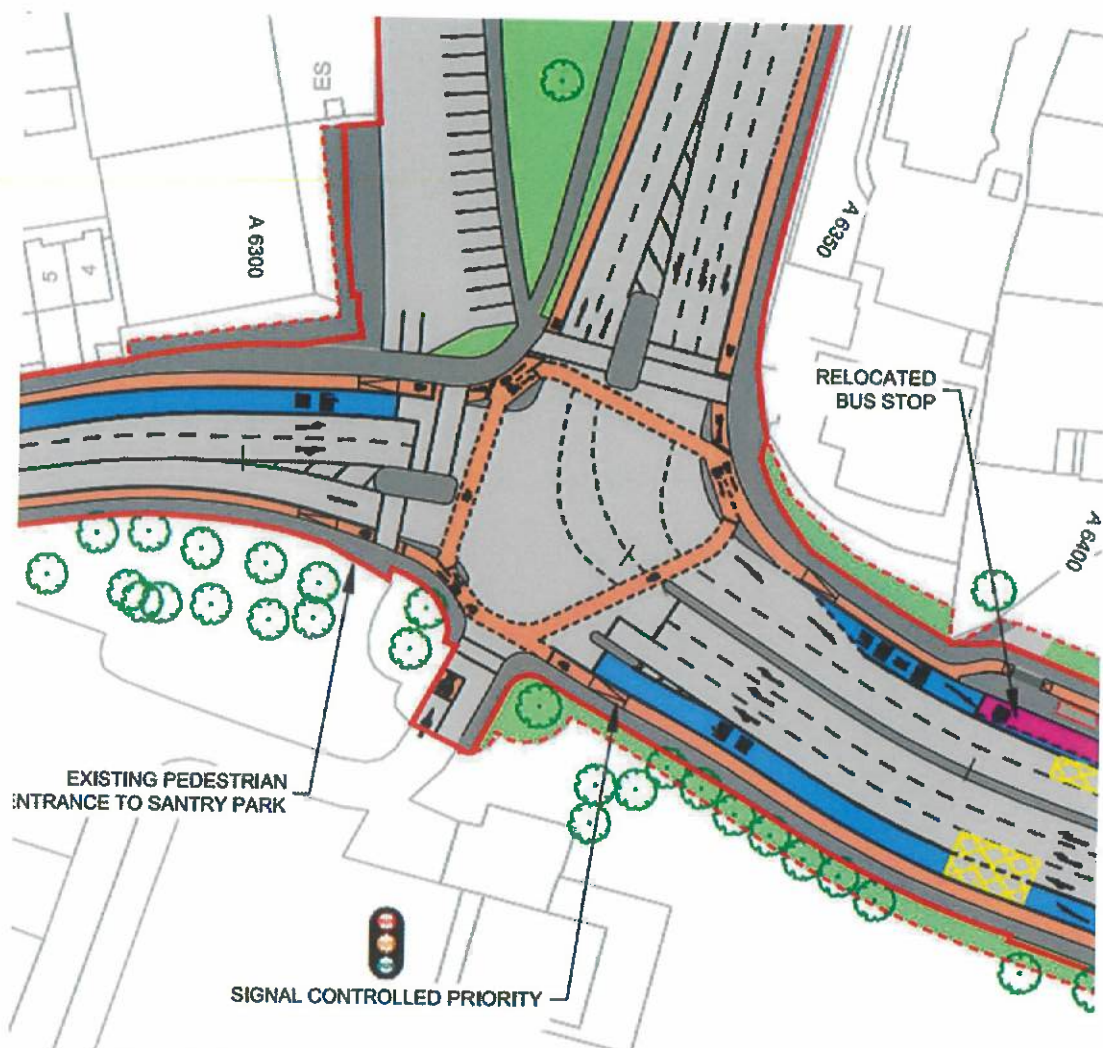


Figure 2 Example of a junction with a missing pedestrian crossing at Coolock Lane

The following junctions are clearly not in compliance with DMURS:

- Kettles Lane (sheet 5)
- Cloghran Junction (6)
- Long term parking/Kealy's Pub (9)
- Old Airport Road (12)
- Quick Park (12)
- Coolock Lane (18)
- Seven Oaks (28)
- Millmount Ave (31)
- Botanic Avenue (31)
- Clonliffe Rd (33)
- Whitworth Rd (33)
- Belvedere Road (34)

- North Circular Rd (34)
- Gardiner St. Upper (34)
- Parnell Sq W (36)

Junction design

The junction design in the Proposed Scheme does not follow international best practice in junction design and is widely regarded as unsafe. We request that the NTA use Protected Junction TL501 of the NTA's own Cycle Design Manual (Dutch-style junctions) throughout the project.

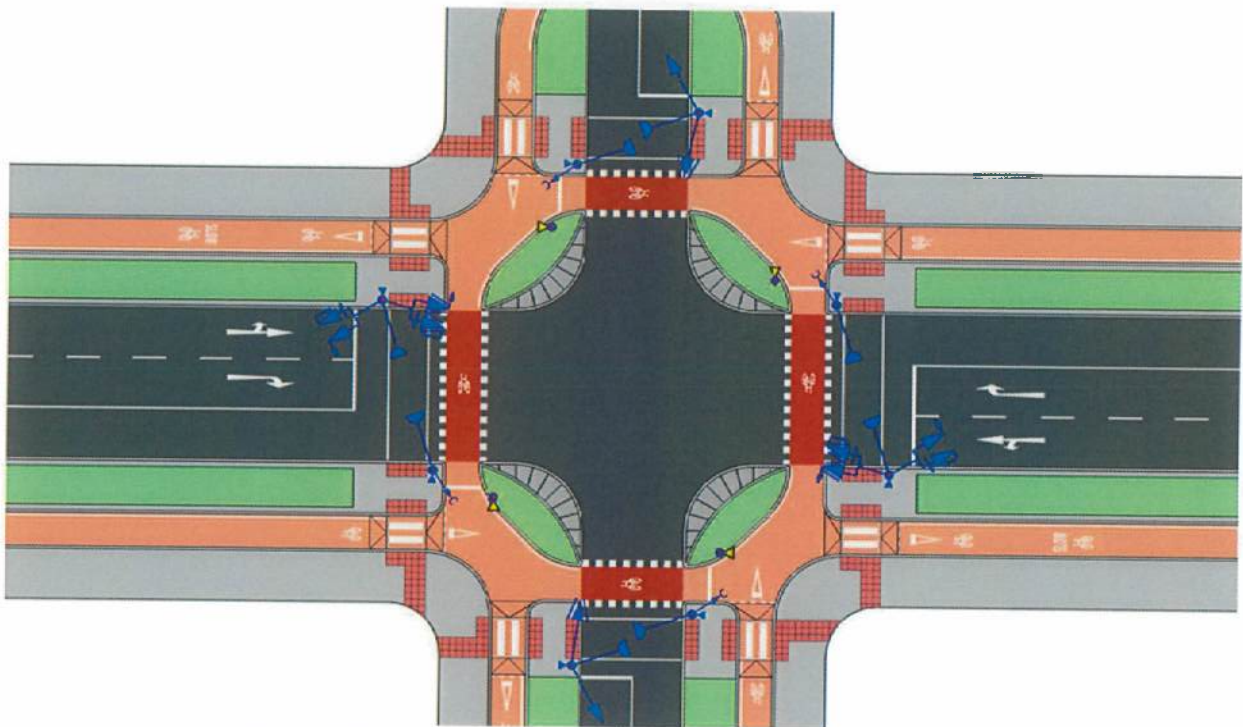


Figure 3 Protected Junction TL501 from the NTA's Cycle Design Manual



Figure 4 Dutch-style TL501 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.

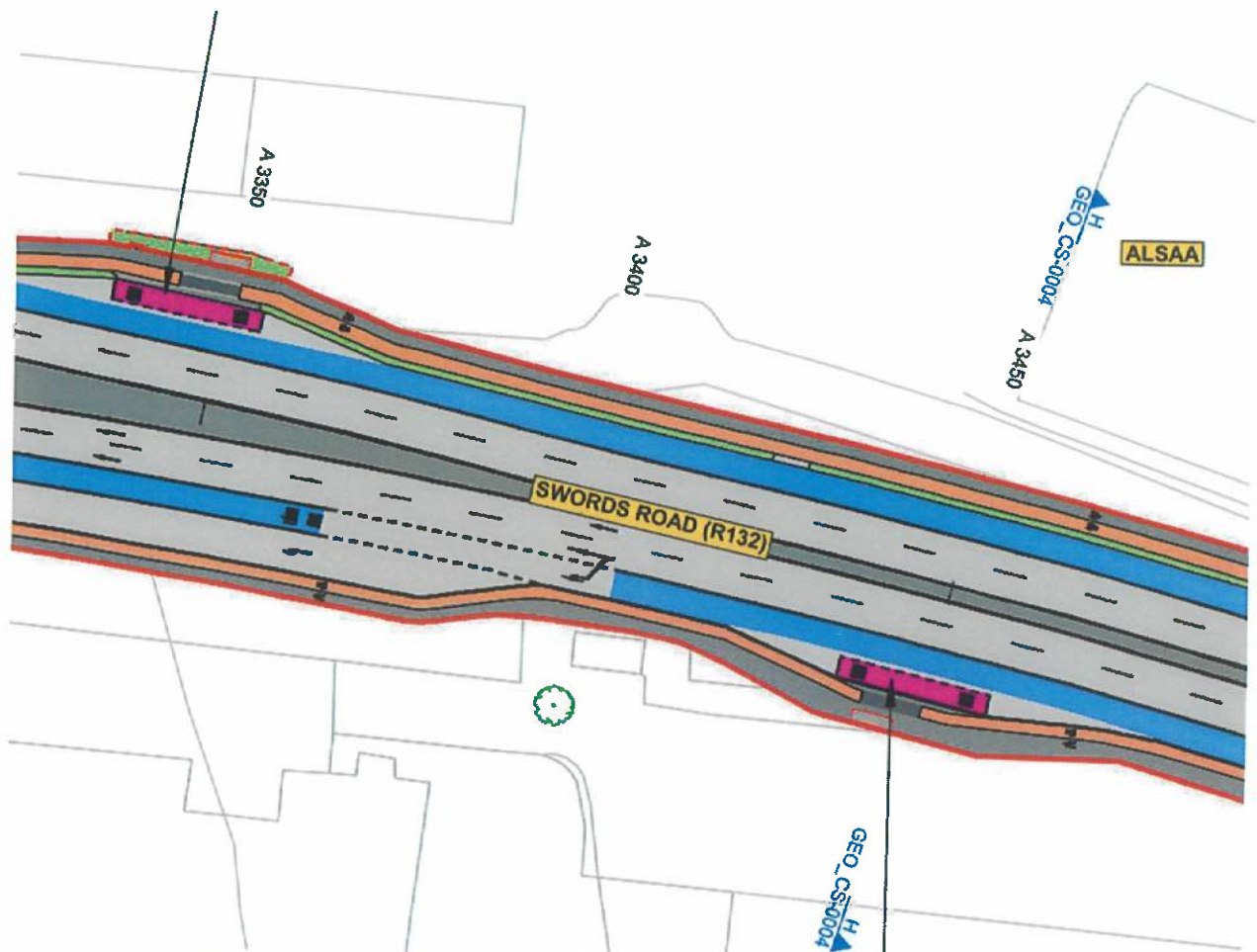


Figure 5 Bus stops with inadequate bus stop islands for cycling on Swords Road

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 6 shows a much safer design on Swords Road where the cycle track is routed behind the bus shelter to reduce conflict.

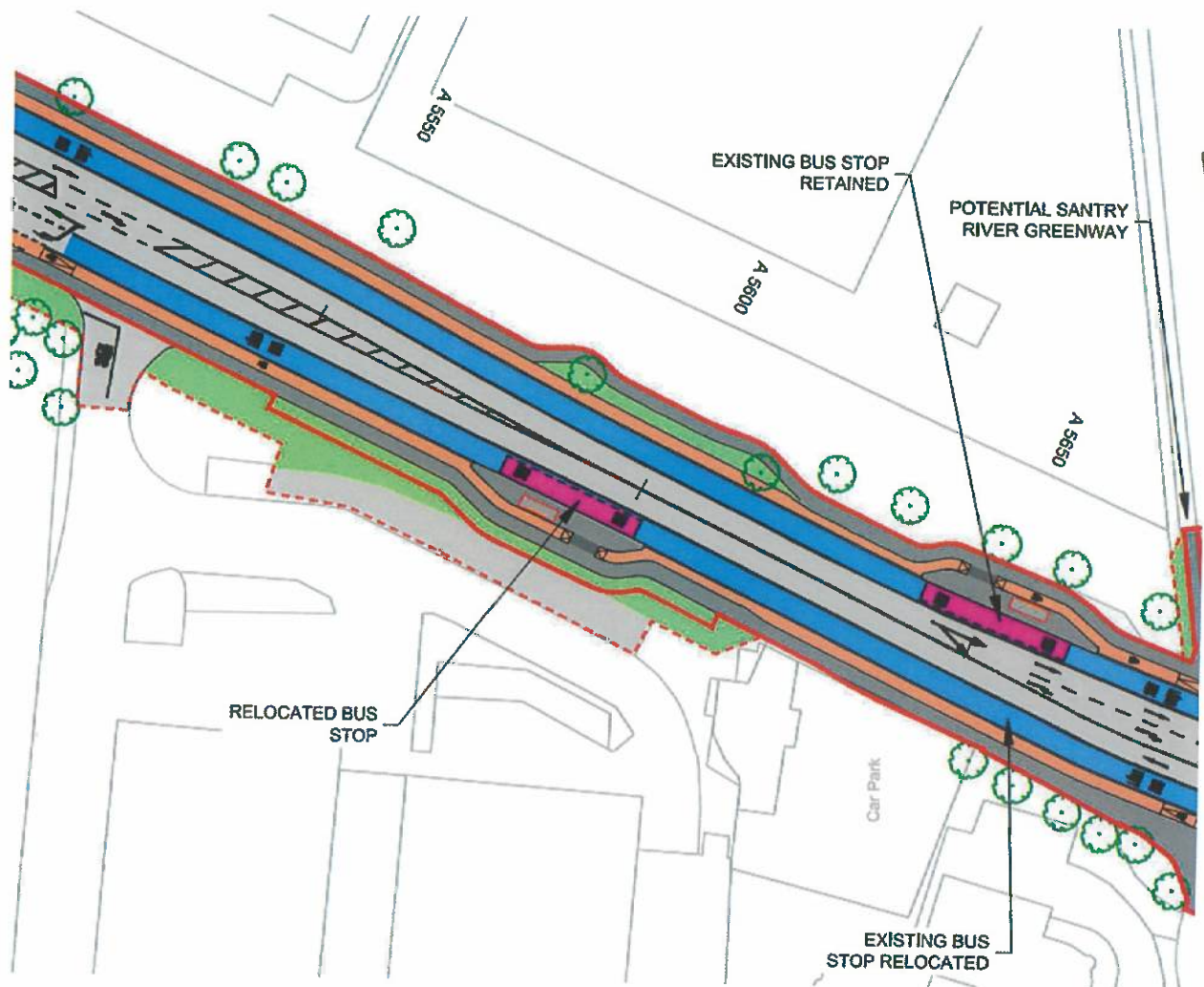
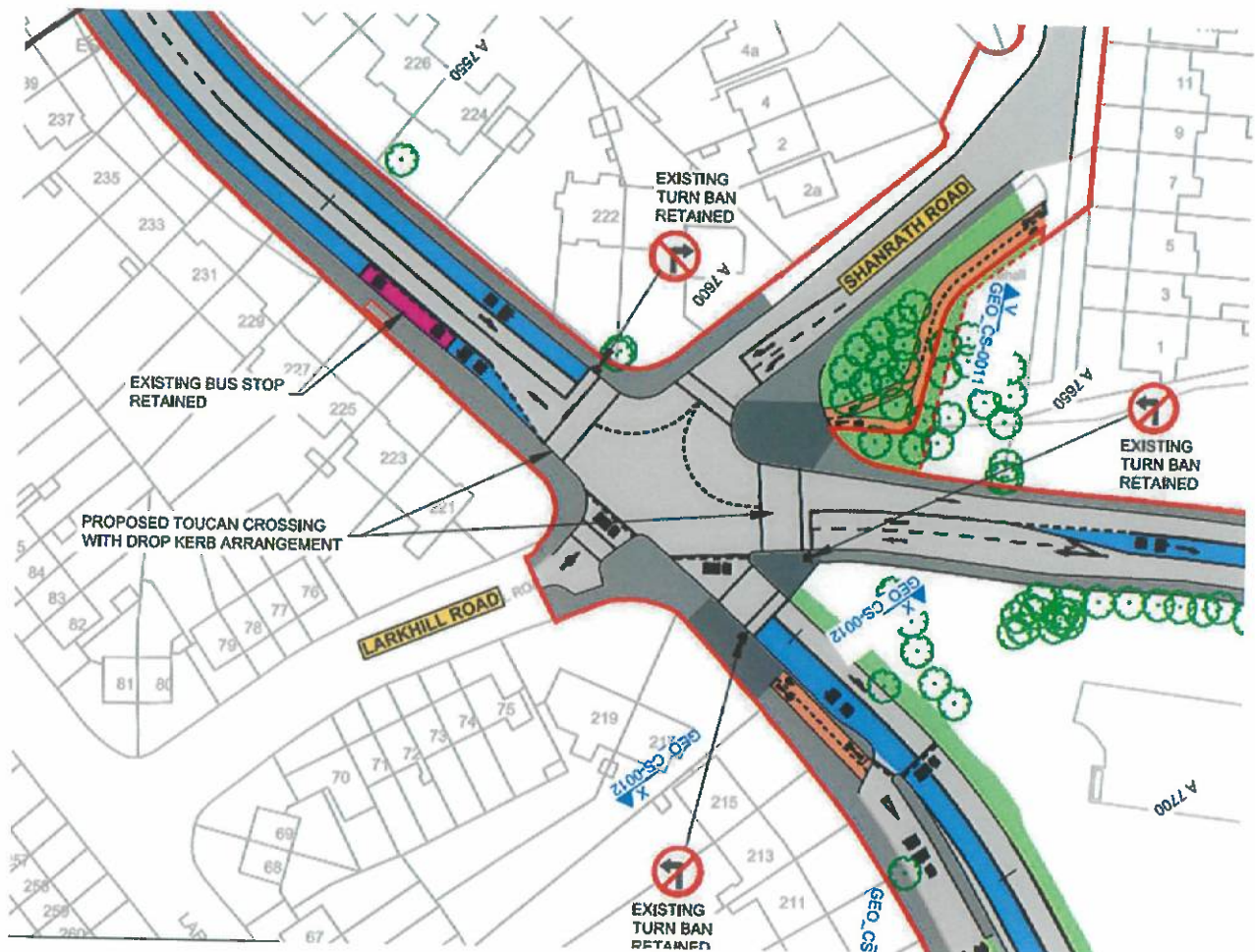


Figure 6 Example of a safer island bus stop design

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-accomplis 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

South Corballis Road junction

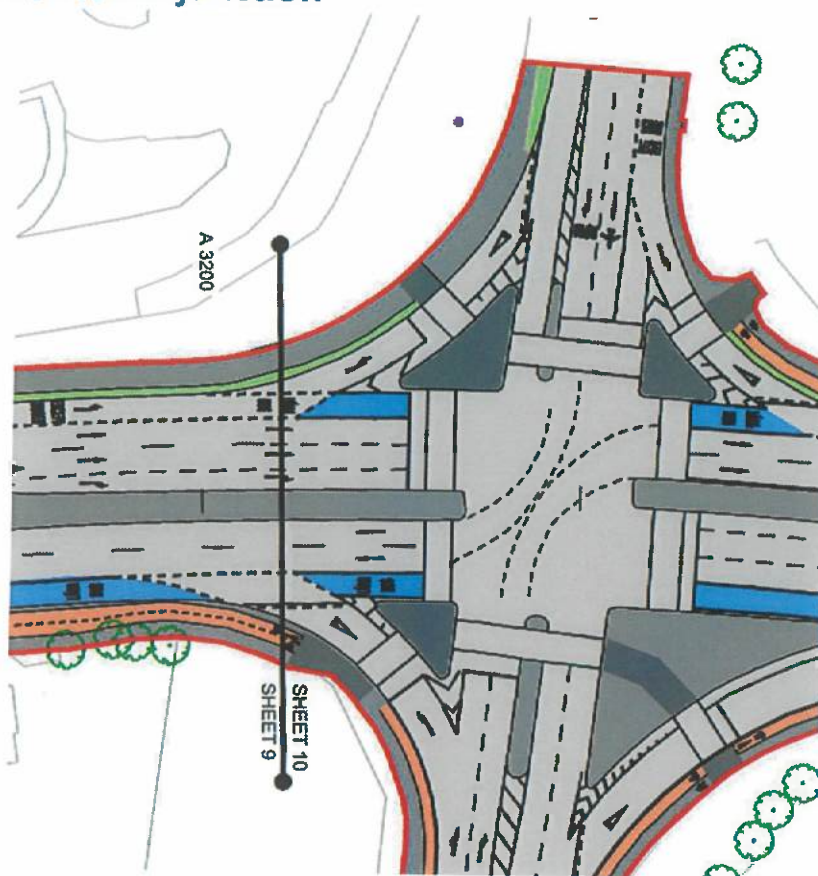


Figure 7 Junction of South Corballis Road and Swords Road (R132)

This junction is unsafe for pedestrians and cyclists and clearly does not enable sustainable modes of travel. Due to the provision slip lanes to prioritise turning car traffic, pedestrians have to make four crossings to get from one side of the road to the other and five crossings to go from one corner to the other. This could take over five minutes and is completely unacceptable. The southbound cycle lane on the western side of Swords Road ends at South Corballis Road and continues on the eastern side of Swords Road. There are 5 crossings between these points which is indirect and time-consuming.

Millmount Avenue junction

This junction needs to be completely redesigned. It's incoherent and unsafe. It's also missing a footpath on one corner as well as a pedestrian crossing on one arm. The cycling provision is confusing and overcomplicated.

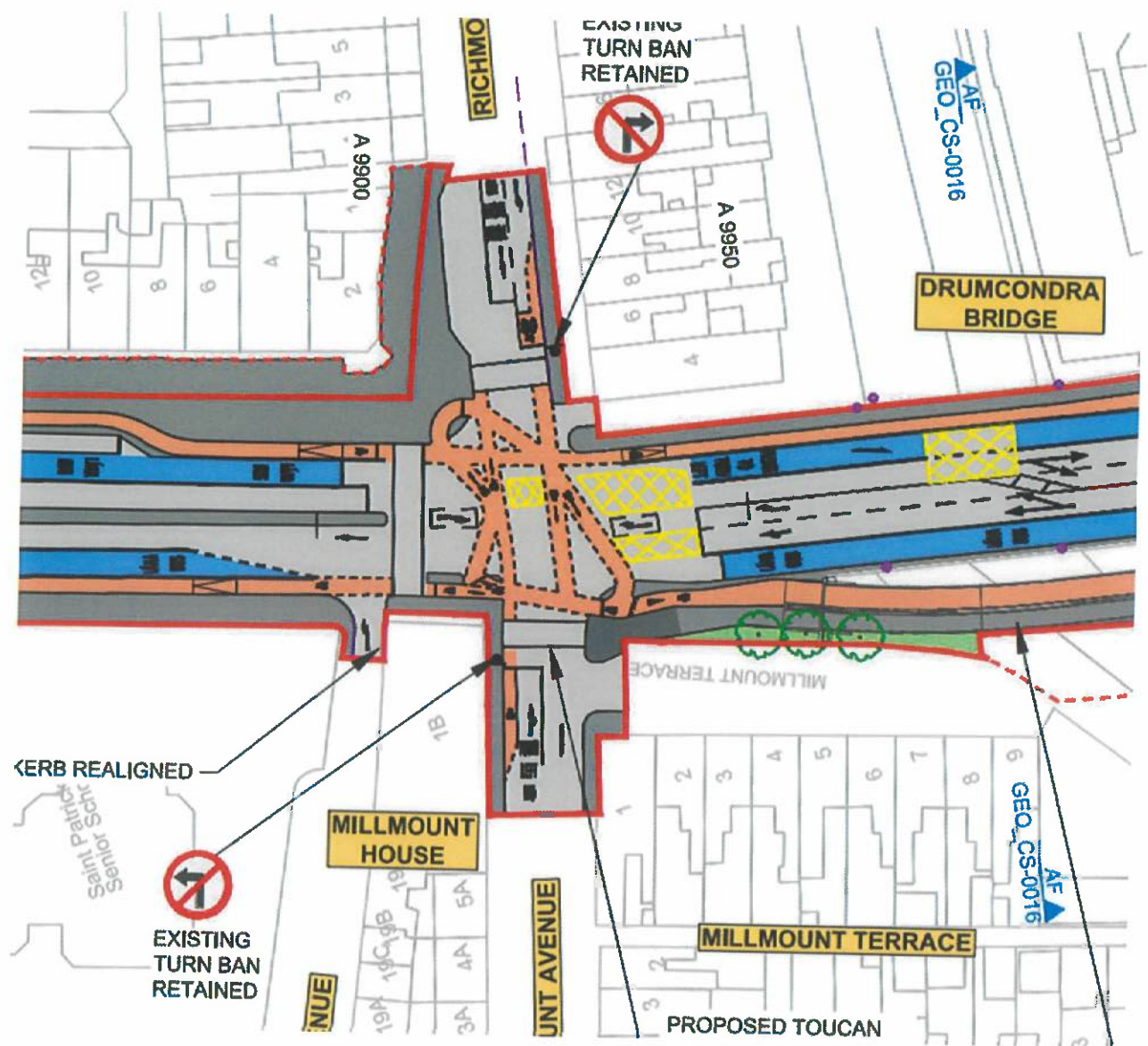


Figure 8 Incoherent junction at Millmount Avenue

Dorset Street median

This is an excellent opportunity to remove the dual carriageway median on Dorset Street to create a proper urban street. Medians encourage speeding, increase crossing distances and divide communities. Removing this median would slow down car traffic, provide more space for footpaths of either side and enable trees to be planted on the sides of the street where people can interact with them.

Dorset Street junctions

The unsegregated and poorly segregated junctions on Dorset Street are not safe and suitable for all ages and abilities. We ask that these junctions be replaced with fully segregated Dutch junctions Protected T-Junction TL504 and Protected Junction TL501 of the Cycle Design Manual.

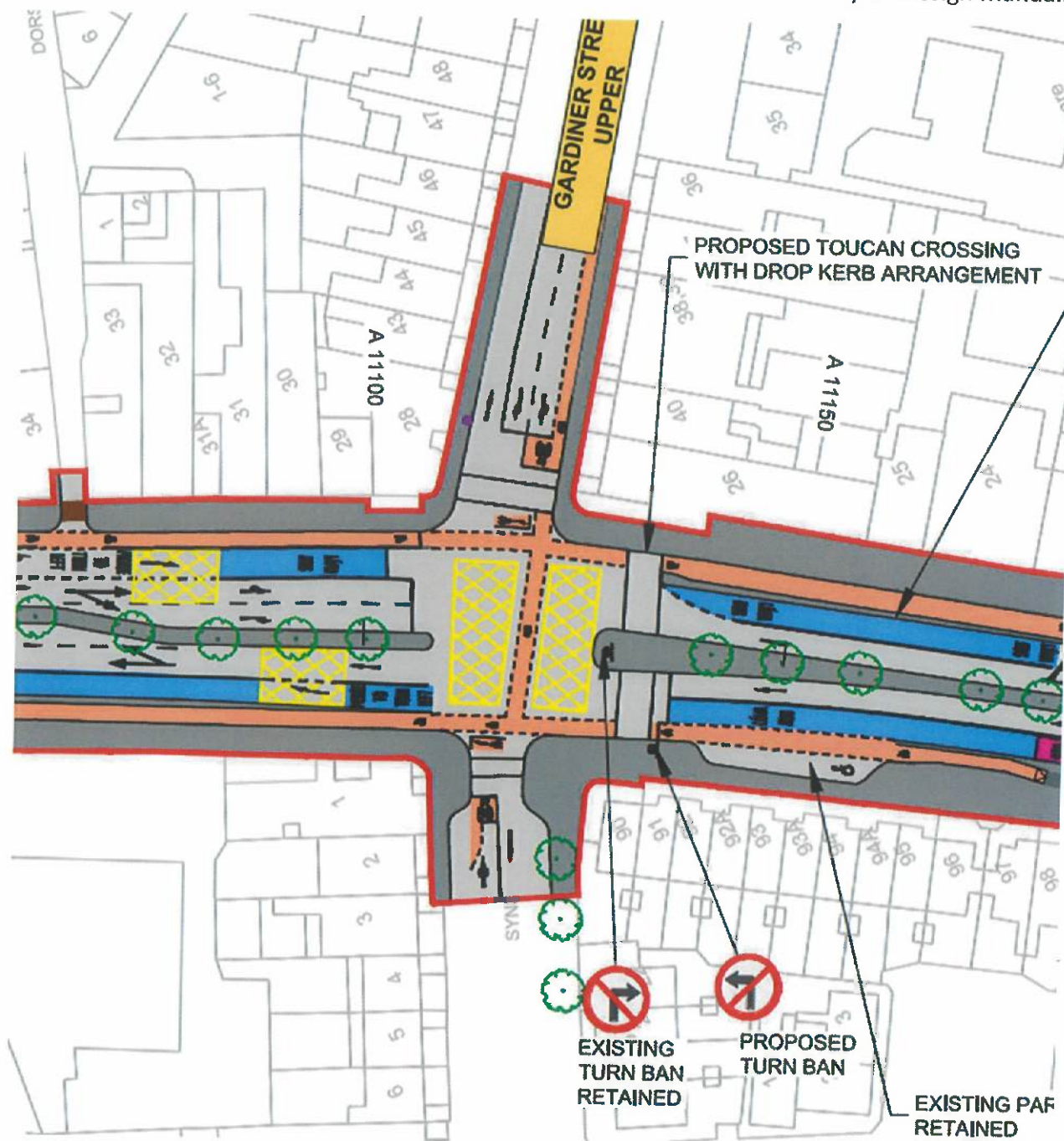


Figure 9 Improperly segregated junctions on Dorset Street