Our Case Number: ABP-317121-23

Planning Authority Reference Number:

An Bord Pleanála

Dublin Cycling Campaign
c/o Colm Ryder
The Tailors' Hall Back Lane
Dublin 8
D08 X2A3

Date: 13th 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 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

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D01 V902

64 Marlborough Street
Dublin 1
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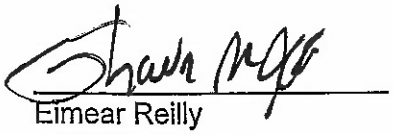
Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Eimear Reilly
Executive Officer
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RCN 20102029

To: **An Bord Pleanála**

Date: 12th September 2023

Re: **Bus Connects Dublin - Swords to City Centre: Case HA06D.317121**

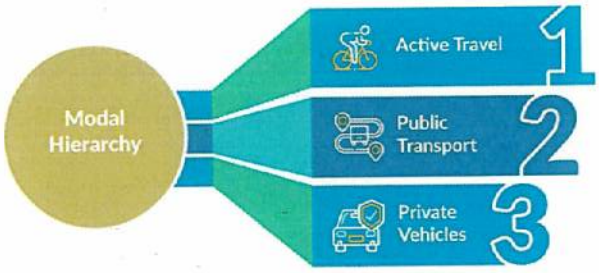
1.0 Introduction

Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. 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. Dublin Cycling Campaign is a member of Cyclist.ie, the Federation of Cycling Advocacy Groups, Greenway Groups and Bike Festivals on the island of Ireland, and the Irish member of the European Cyclists' Federation.

The Campaign has been engaging with the applicant, National Transport Authority, through all stages of this project. We outlined general points on important design details that particularly affect cyclists, and apply to the proposed route. In this submission, we do not reiterate all of these points in detail, as many of them have been included in this 'final' design proposal.

On the whole, we are happy to see these proposals advance. However we believe that without modifications in a number of areas it will not deliver on the cycling modal shift called for in the National Sustainable Mobility Policy. We suggest a number of design issues below that need to be tackled, all of which are possible via condition, if An Bord Pleanála is agreeable.

The Department of Transport's infrastructure investment framework (NIFTI) set up a clear hierarchy of transport modes, which we suggest has not been adhered to in some locations along the proposed route, and in particular in the vicinity of Dublin Airport, which is a critical transport hub.



2.0 Four Types of Cyclist

The goal for a project of this nature, besides delivering on an improved and reliable bus service, should be to create a cycling environment that is suitable for people of all ages and abilities. That way the project can achieve the greatest modal shift to cycling, which will help Ireland achieve its climate, public health, and transport ambitions.

A useful typography is the 'Four Types of Cyclist' by Dr Jennifer Dill, Professor Urban Studies & Planning:

1. 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.
2. Enthused and Confident (5-9%): They will mix with some traffic. They require some infrastructure.
3. 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.
4. No Way, No How (25-33%): unlikely to ever cycle no matter the conditions

Most of the people now using bikes in Dublin are in the first two cohorts; people in the largest 'Interested but Concerned' cohort are disinclined to use a bike, due to the disconnected network available, and the safety issues on many routes. BusConnects moves towards resolving some of these issues but must also resolve the points we set out below in section 4 or it will not attract these users and will fail to fulfil the goals of the National Sustainable Mobility Policy.

3.0 Welcome improvements

The proposed cycling infrastructure on this project will significantly improve the existing situation, other than in the vicinity of Dublin Airport, which to our thinking requires a complete design overhaul in order to meet the NIFTI modal hierarchy standards, as set out above. Elsewhere it will provide an environment that will attract a large number of 'interested but concerned' people to use their bikes for more journeys, for a number of reasons:

- Continuous verge and kerb-protected cycle tracks along the majority of the length of the project;
- Bus stop bypass designs that mean people cycling never share the same space as buses, and where bus passengers can safely board or alight without sharing with cycle traffic. We also welcome the strategic moving of bus stop locations to allow for bus stop bypasses, as called for in previous submissions.
- Protected cycle junction designs at many locations so people cycling aren't mixing with heavy traffic at large junctions
- Roundabout replacements with protected junctions at a number of presently problematic locations

- The removal of slip lanes at many of the major junctions, other those mentioned in Section 4 below.
- The proposal for a new Tolka cycle/pedestrian bridge is to be commended

4.0 Issues Requiring Attention

We urge An Bord Pleanála to require the applicants to address the following issues:

4.1 The complete design review of the cycling and walking provision between both airport junctions; the Cloghran Roundabout, and the Corballis Road Junction:

Through both of these junctions along the R132 Swords Road axis both cyclists and pedestrians, contrary to the NIFTI modal priorities and the objectives of the overall Bus Connects project, are forced to make numerous and complicated crossings of slip roads and main traffic roads in navigating the crossings. As presently proposed, the designs for this section of the route promote the private car above the vulnerable road user, and also bus public transport. All junctions contain slip lanes against the standard recommendations of the National Cycle manual.

The present proposed cycle design will not encourage increased mode share and could be considered a diminution of the cycle route quality from the present status. Retaining high-speed, multi-lane, gyratory systems for the convenience of private motorists, with expansive stacking lanes at junctions (e.g. Cloghran),is not acceptable for this major project in the middle of a climate emergency.

The suggested mode share at the Cloghran Roundabout as outlined in Appendix L - Junction Design Report, indicates that cycling will have just a 2% mode share and the Corballis junction a 1% mode share following construction? This Report also suggests that the overall traffic levels at the Corballis Junction are greater than twice those of the Cloghran Roundabout?

There needs to be a design review to consider either:

- A major innovative design in this area for this important national infrastructural project, to enable safe and direct navigation of the Swords Road route by both cyclists and pedestrians, as well as linking to ongoing routes both to and from Swords and to and from the city centre, and into the Dublin Airport complex. The Hovenring in Delft in the Netherlands is a prime example of the form of innovative design thinking required
- At the very least, the removal of slip lanes along this axis from the Cloghran roundabout to the Corballis Road junction, to improve directness and to reduce the crossing difficulties for pedestrians and cyclists, and the redesign of the Corballis

Road junction as a cycle protected junction with clear guidance and priority for pedestrian and cycle movements.

We recommend the option of a major innovative design.

4.2 Consistency in Junction Design

Within any network the users of that network will generally look for consistency of design to enable them to navigate that network in a safe manner and to be able to anticipate movements at critical junctures. While the majority of the improved junction designs along this proposed Bus Connects route are consistent in their general approach in relation to all modes, but particularly in relation to cycling, there are a number of junctions, which, for unknown reasons, are dealt with in a different manner. It is not clear why this is happening, and we can find no explanation in the submitted documentation.

The 'outlier junctions' along this route, other than those referenced in Section 4.1 above, include the following:

- Northwood Avenue Junction advises cyclists to use Toucan Crossings to navigate entering or leaving the Main Swords Road despite this being contra to the clear advice of the new Cycle Design Manual (CDM) as outlined in Section 4.4.4.3 - *'As shared facilities are generally disliked by both pedestrians and cyclists, signal controlled junctions with toucan crossings should only be used in exceptionally constrained environments'*

- Santry Avenue Junction is a mishmash of ideas with poor pedestrian crossing facilities on the southern arm and no clear cycle route into Santry Avenue for cyclists coming from the northern end. Once again the use of a Toucan Crossing and shared facilities is proposed contrary to CDM advice.

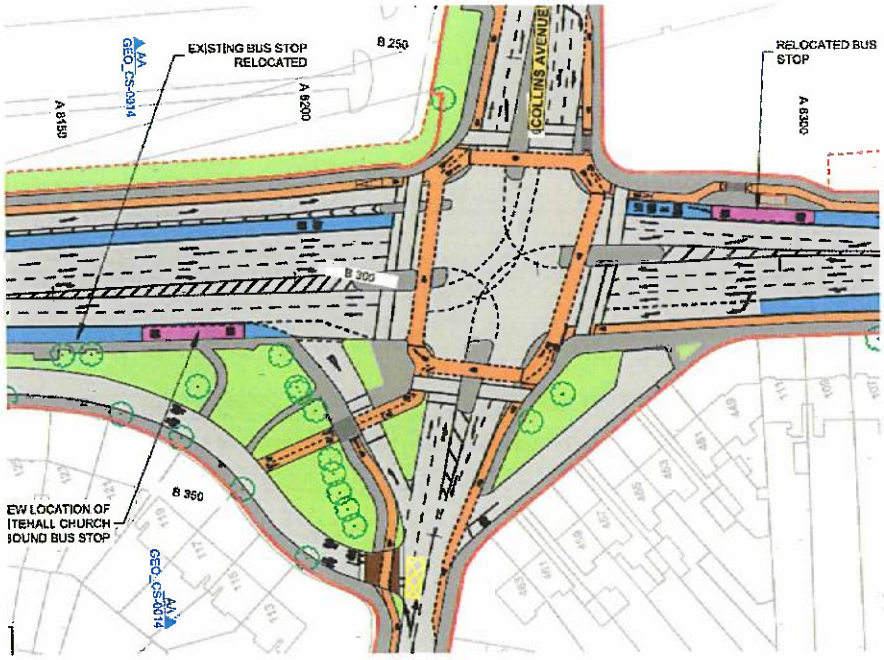
- Omni Park Junction as proposed, is the link to a new proposed 'Quiet Street' concept through Lorcan Road, between this junction and Shantalla Road - see comments in Section ? below. While there is improvement in the proposed pedestrian environment at the junction by removing the slip lane and horrific pedestrian island on the south leg, the left turn slip lane from Omni on to Swords Road is retained, forcing pedestrians to make 2 separate crossings of the one junction leg. The slip lane should be removed.
Furthermore no specific facility has been included for the access of bicycles into the Omni Centre itself. This is an oversight and will further discourage the growth of cycle mode share.
The proposed crossing by cyclists exiting Lorcan Road to head northwards will continue to remain fraught under this design, and needs to be very clearly marked,

ideally through the use of coloured asphalt, and an advance green provided ,due to the speeding nature of surrounding traffic, and the difficulty of the right turn cycling manoeuvre.

We advise the consideration of a full cycle protected junction at this point, including access for cycling to and from the Omni Centre.

- Shanrath Road/Shantalla Road Junction has the potential to be much improved for cycling above that proposed, and to provide less interruption to the trees close by the junction. We want to see a clear and more direct route between the Shanrath Road proposed 'Quiet Street' and the existing old Swords Road 'Quiet Street'. This can be achieved by using the available road space on the Shanrath Road exit, and part of the grass verge, and reducing the exiting southbound vehicle space on Shanrath Road to one lane. There is a lack of coherence and legibility in this junction design, particularly for cyclists.

- Collins Avenue Junction design still proposes to retain a left turn slip lane for vehicles heading north from Collins Avenue West. This is against standard Cycle Design Manual practice and national policy in that it makes road crossings longer and more difficult for both pedestrians and cyclists. The proposed vehicle slip lane also discommodes cyclists travelling eastwards along Collins Avenue towards the main junction. This slip lane - see below diagram - should be eliminated.



- Griffith Avenue and other Junctions towards City Centre

We note the various differing, and often puzzling, configurations - outside the norm of protected cycling junctions - of cycle tracks and Toucan crossings at Griffith Avenue. Richmond Road, Whitworth Road, North Circular Road, Gardiner St, Gardiner Row, and Granby. We have failed to find, among the multiple documents, the reasoning behind these

differing configurations. This should be responded to, and ideally consistency applied to ensure the junction designs are consistent and legible for all users?

4.3 Exits on to Main Design Route

There are a large number of major exit points from industrial estates and various business and leisure premises along the proposed route which do not provide any detail on the issue of assumed right of way for pedestrians and cyclists. Ideally these exits/entrances should be of a design similar to the side road junctions, with raised tables to signal clear priority for crossing pedestrians and cyclists? This design flaw needs to be factored into the final design, to ensure that pedestrians and cyclists maintain right of way at these major exits. This specific multi exit/entry problem is particularly critical along the stretch from Dardistown Cemetery (CH 4100) to Northwood Avenue (CH 5700).

4.4 Cycle track widths

Cycle track widths are below the Cycle Design Manual recommended widths in many areas throughout the scheme, being as low as 1.5m when adjacent motor traffic is provided with carriageway of over 12m (cross-section J-J). In most cases there is space to increase the width of the cycle tracks, by reducing traffic lane or footpath width, and it is not clear why the narrow cycle tracks were included in the design.

We also believe that any cycle track proposed to be constructed at less than 2.0 m is not being built for the envisaged future capacity. 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 new Cycle Design Manual, 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 Cycle Design Manual permits 1.5m as an 'absolute minimum' where cycle numbers are less than 300 per hour.

4.5 Health Economic Assessment:

Nowhere in BusConnects documentation is a full economic assessment of the population-level effects on health carried out. The Environmental Impact

Assessment Report chapters of BusConnects planning applications, which cover human health impacts, are inadequate and generalised. They say only that health impacts for non-communicable diseases will be 'positive, significant and long-term'.

The beneficial effects of providing active travel infrastructure are significant and widely recognised. Financial benefits to society (e.g. through HSE savings) and individuals are calculable and would provide valuable validation of the benefits of BusConnects.

In the case that further information or review is required, we call on the applicants to furnish detailed assessment to WHO HEAT standards based on the best available modelling of projected modal shift from sedentary travel (by car, particularly for short trips) to active travel. Guidance on the value and methodologies of health impact assessment is issued by Public Health Ireland at https://www.publichealth.ie/hia.

4.6 Other issues:

- The design of the proposed 'Quiet Street' for cycle access in Santry has not been fully clarified. This proposed off main route cycle connection is along a relatively busy local road network, with many parked vehicles. The design proposal needs to address the specific safety and ease of travel of cyclists along this proposed 'Quiet Street'?
- Why is there a bus lane break at Ch 4300 opposite Quick Park location?
- The function and design layout of the Yellow Junction Box at CH 5150 is unclear?
- We are disappointed that the opportunity to reduce general traffic manoeuvres at the Church Avenue and Ormond Road side roads, and thus improve overall safety, has not been grasped by making these side roads one way in and out separately.
- The widths of the proposed cycle tracks along Dorset St are compromised. The decision to provide no cycle infrastructure along Dorset Street Lower, even where private motorist parking spaces are to be preserved, is deplorable.
- The continued allowing of general traffic along North Frederick St and Parnell Square East compromises the functioning of the bus lanes in this area and should be reviewed?
- Dublin Cycling Campaign broadly welcomes the proposals to include raised table crossings at side road junctions to signal priority and ease of crossing these side roads for pedestrians and cyclists. However, we are confused by the outlined road marking arrangements at these junctions, whereby, in many instances, pedestrians and cyclists are advised to yield to crossing traffic, and

at the same time crossing road vehicles are also advised to yield? This design confusion needs to be clarified?

- Greater design clarity is required for the Parnell St junction, in relation to access by private traffic, bus priority, and clarity on provision for cycling movements connecting to ongoing routes?

5.0 Conclusion

We urge An Bord Pleanála to carefully consider the above design issues raised, particularly at junctions. Providing properly for the large cohort of 'interested but concerned' cyclists, with its health benefits and reduction of demand for public transport, will ensure Bus Connects fulfils its potential to substantially enhance the lives of Dubliners.

Colm Ryder
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Email: [redacted]
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