Our Case Number: ABP-317660-23

Planning Authority Reference Number:

An Bord Pleanála

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

Date: 22 September 2023

Re: Busconnects Kimmage to city centre core bus corridor scheme
Kimmage, Dublin

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,

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Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02

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19 September 2023

Kimmage to City Centre Core Bus Corridor (Case: 317660)

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 of 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, the 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 the Kimmage to City Centre Core Bus Corridor Scheme, on transport, environmental and health grounds:

> Transport: The population of Dublin South West has continued to grow since 2019 when this scheme was originally proposed and the route was already at capacity due to high levels of car usage. There is an urgent need to rebalance road space to facilitate fast and attractive bus services and safe and active travel by bike, scooter or on foot.
>
> Environment: 19% of Ireland's overall greenhouse gas emissions come from transport, with private cars making up approximately 65% of transport emissions in Dublin. As part of the Climate Action Plan 2023 our transport emissions must be halved between now and 2030. Bus Connects can make public transport and active travel an attractive way of getting around the city and contribute to reductions in emissions from transport.

Health: Large numbers of people in Ireland are not meeting recommended levels of physical activity, while 39% of the adult population are overweight and 23% are obese. A recent study by DCU found that one in four Irish children cannot run properly due to low rates of physical activity in their lives. Regular cycling for everyday journeys, such as cycling to work or school, builds exercise into busy lives and can be easier to maintain compared to recreational physical activity. The 2019 Bike Life study in Dublin found that 21% of adults who currently don't cycle, would cycle if safe cycling infrastructure was provided. Bus Connects will provide more safe cycling infrastructure.

Nowhere in the 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 generalised and only say that health impacts for non-communicable diseases will be 'positive, significant and long-term'.

The full benefits of the scheme would become evident through:

- A health and economics benefits assessment using the WHO HEAT model (HEAT for walking and cycling (who.int)
- A health impact assessment using guidance from Public Health Ireland at https://www.publichealth.ie/hia.

The following sections of this document are as follows:

- Section 2.0 Achieving National Mobility Policy Targets
- Section 3.0 Universal Design considerations
- Section 4.0 Welcome Design Interventions
- Section 5.0 Elements of the Scheme for Consideration - *aspects of the scheme we believe need to be addressed, if it is to achieve its stated aims*
- Appendix A - Detailed comments on elements of the scheme

We request an Oral Hearing to discuss the issues raised below, and in the Appendix.

2.0 Achieving National Mobility Policy Targets

The goals of the National Sustainable Mobility policy are to halve transport emissions by 2030, and add 500,000 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 typography '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 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 as a result of submissions by ourselves and others during previous rounds of consultation. These include:

- Provision of cycling facilities along the main CBC corridor
- Introduction of a bus gate at peak times from the KCR to Harold's Cross, to improve bus journey times
- Provision of new canal bridges at Emmet Bridge to provide additional space for pedestrians and cyclists;
- New bus stop by-passes along sections of Kimmage Road Lower, Harold's Cross Road and Clanbrassil Street
- Construction of new retaining wall at Emmet Bridge/ Clanbrassil Street to provide for adequate width;
- Provision of segregated cycle tracks along Harold's Cross Road;
- Addition of a quiet way along the Poddle and through Mount Argus;
- Retention and enhancement of cycling facilities on Clanbrassil Street;
- The removal of the cycleway through Ravensdale Park thus eliminating the impact on trees and the amenity value of the park;
- The improved pedestrian/cyclist facilities at the KCR junction and the removal of the slip roads.

5.0 Elements of the Scheme for Consideration

The points described below in sections 5.1 to 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 the Appendix attached; this is a listing of all further recommendations and suggestions with respect to particular locations within the scheme.

5.1 Quality of Cycling Facilities

We are disappointed to see low-quality intermittent cycle lanes shown on the Lower Kimmage Road. While the scheme increases the total cycling facilities from 2.8 km to 4 km, of this 2 km consists of the existing advisory cycles lanes. And along two sections of Lower Kimmage Road the advisory cycle lanes will be removed and replaced by formal car parking spaces.

At the moment parking is not allowed in the inbound cycle lane from 7-10am, and the outbound cycle lane from 16:00-19:00. Outside of these hours the cycle lanes are frequently used for parking. This will put cyclists in danger of "dooring" and force them into the bus lanes.

This design does not appear to be consistent with the scheme goal to:

"Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable;."

Neither will it encourage "Interested but Concerned" cyclists or parents with children to cycle along this route.

We suggest the scheme would be improved by upgrading the advisory cycle lanes to segregated cycle tracks. These cycle tracks would be available 24/7 to enable safe cycling trips at any time of the day (for shopping, the school run, commuting, leisure, etc.), and not just during the morning and evening commuting periods.

5.2 Bus Gate Operating Hours

The proposed operating hours of the bus gate are 8:00-10:00 and 16:00-20:00 Monday to Sunday. This does not align with school closing times, so children who might cycle to school (with or without parents) will be forced to mix with traffic on the way home.

We suggest that the bus gate should operate during the time periods when children are travelling to and from school.

5.3 Cycle Track Widths

Throughout the scheme we see a variation in the proposed widths of the cycle tracks. As per the NTA's Cycle Design Manual (published September 2023) we would expect that the cycle tracks have a minimum width of 2.0 metres. 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, some examples of where the cycle lanes and cycle tracks are less than 2m include:

- Lower Kimmage Road: cross-section C-C 1.5m cycle lane, cross-section F-F 1.2m cycle lane, cross-section G-G 1.2m cycle lane
- Harold's Cross Road: cross-section I-I 1.5m and 1.5m-2m cycle tracks, cross-section J-J 1.5m cycle tracks, cross-section K-K and L-L 1.5m cycle tracks

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 2m 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 Cycle Design Manual, permanent separator kerbs would be 0.25m. This width is required to be additional to the prescribed track width. 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, and states that designers should look to provide the widest possible width between 1.5m and 2m.

5.4 Quiet Street Treatment

The scheme includes two 'Quiet Streets' routes: the Poddle Way, and east of Kimmage Road Lower on Derravaragh Road. We welcome these routes and the additional traffic restrictions. The utilisation of filtered permeability, such as on Derravaragh Road, is a welcome approach. The engineering solution of bicycle

gates will negate the possibility of 'rat-running', will improve traffic calming in the area, and improve the environs for residents.

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 could be used to further cultivate a 'Quiet Street' environment.

5.5 Speed Limits

We welcome the introduction of a 30 km/hr speed limit along a 2 km stretch of this scheme. It is not clear from a legislative perspective how this will be executed given speed limit changes are currently under the remit of local authorities.

However, compliance with speed limits in Ireland is poor. The RSA 'Driver Attitude & Behaviour Survey 2021' found that 57% of motorists admit to exceeding 50 km/h speed limits by up to 10 km/h. The survey didn't ask motorists if they comply with 30 km/h speed limits, but it is evident that compliance is even worse for 30 km/h speed limits. We therefore request that driver behaviour with respect to speed limits is cultivated through engineering design and supported by automated speed cameras.

The following excerpts from DMURS outline this requirement.

'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 Kimmage to City Centre Core Bus Corridor Scheme, though requests alterations to some elements of the design:

  - Upgrade of advisory cycle lanes to cycle tracks,
  - Continuous cycle tracks along the full route,
  - Appropriate cycle track widths,
  - Operation of bus gate during school opening *and* closing periods,
  - Enforcement of 30 km/h speed limits,
  - Utilisation of filtered permeability, and
  - Formalisation of the Quiet Streets concepts;
- Requests an oral hearing on this application.

Yours sincerely

Ellen Cullen

Chair, Dublin Cycling Campaign

Appendix A

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 – Lower Kimmage Road

- Cross-section B-B: cycle lanes have no segregation from traffic lanes - it would be much safer for cyclists, especially children on bikes, if the cycle lanes were segregated

Sheet 02 and 03 – Lower Kimmage Road

- Cross-section C-C: the 1.5m inbound cycle lane should be widened and segregated from the traffic lane. A parking-protected outbound cycle track should be built past the shops, with bus stop bypass; the planted median could be narrowed or removed, if necessary

- Cross-section D-D and E-E: there is no cycle track but new linear parking spaces are provided (width 2.3m). The removal of an existing cycle lane to allow for private motorist use here conflicts with DMURS, and with NTA and TII hierarchies of road user policies. There is car parking to be retained in the plans on the west side of the road, at footpath level, while houses on the east side have an established mews lane available for private motorists to park, so we would strongly contend that the cycle lane not be removed, and instead it should be upgraded to a segregated cycle track.

Sheet 04 - Lower Kimmage Road

- There is space to introduce a bus-stop bypass near the entrance to Mount Argus Church. This would reduce conflicts between buses and cyclists and speed up inbound cycling journeys

Sheet 05 – Lower Kimmage Road

- Cross-section F-F: 1.2m cycle lane and no separation

Sheet 06 – Lower Kimmage Road / Harold's Cross Road

- Cross-section G-G: 1.2m cycle lane and no separation
- There is space to introduce a bus stop by-pass near Mount Argus Road
- Cross-section I-I: 1.5m and 1.5-2m cycle tracks, with 3.7m footpath on one side; though the footpath varies in width, the opportunity should be taken to increase cycle track width locally. This provides space for overtaking

Sheet 07 – Harold's Cross Road

- Cross-section J-J: 1.5m cycle tracks
- Cross-section K-K: 1.5m cycle tracks (reconstructed) including width of separator kerb - there is the option to reduce the two traffic lane widths from 3m to 2.75m to provide more space for the cycle tracks. The width of 2.75m would still be within acceptable DMURS range.

Sheet 08 – Clanbrassil Street Lower / New Street South

- Cross-section L-L: 1.5m cycle tracks (reconstructed) - see comments above re traffic lane widths
- Cross-section M-M: 1.5m-1.8m cycle tracks - see comments above re traffic lane widths
- Cross-section N-N: 1.5m cycle tracks, but 3.1m-3.2m footpaths, and one traffic lane of 3.3m - see comments above re traffic lane widths
- We request that contra-flow cycling be allowed along Windsor Terrace to provide connectivity with the Grand Canal cycle route, as traffic volumes are very low.

Sheet 09 - New Street South

- Cross-section O-O: cycle track width is 1.5m - see comments above re traffic lane widths

Sheet 10 - New Street South

- Cross-section P-P: outbound cycle track width is 1.8m - either the traffic lane width or footpath width could be reduced to get this to 2m

- Cross-section Q-Q: Buffer between parking and cycle track is good
- Cross-section Q-Q: Inbound cycle track has no separation from bus lane - a parking protected cycle lane could be considered here