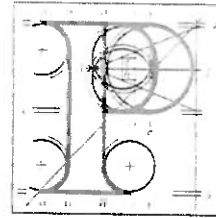


Our Case Number: ABP-317660-23



An
Bord
Pleanála

Dublin Commuter Coalition
5 Abbeyfield
Killester
Dublin 5

Date: 02 January 2024

Re: Bus Connects Kimmage to City Centre core bus corridor scheme
Kimmage, Dublin

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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ABP case ref: 317660

BUSCONNECTS KIMMAGE 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 three 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.

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 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 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

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 Cycle Design Manual (Dutch-style junctions) throughout the project.

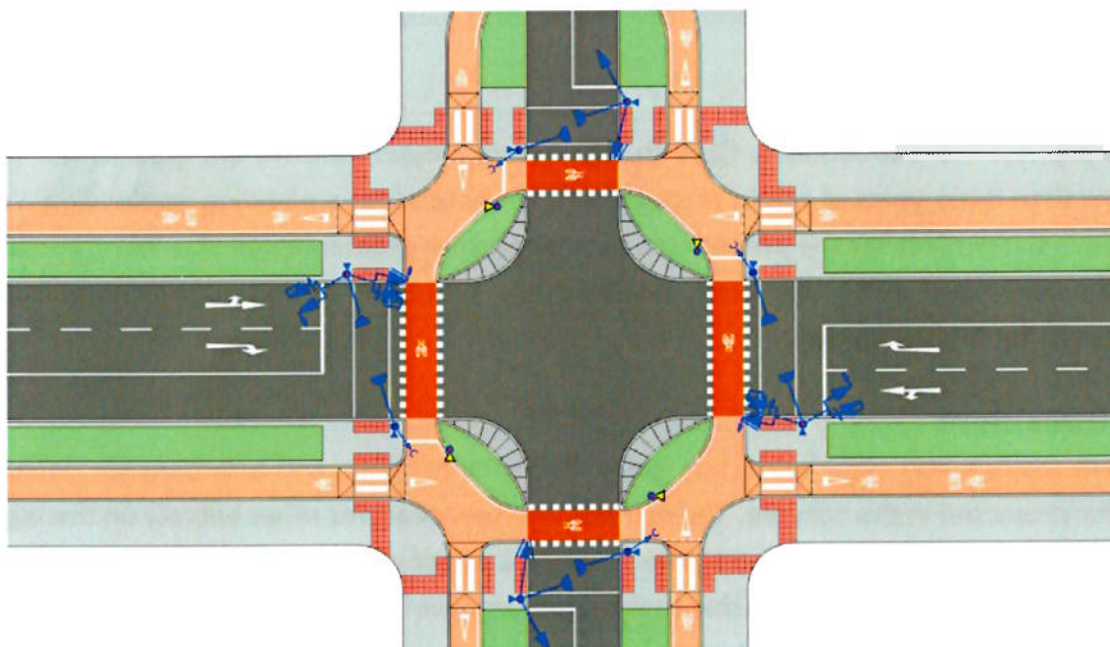


Figure 1 Protected Junction TL501 from the NTA's Cycle Design Manual

The following junctions also do not have sufficient segregation for cyclists:

- Ravensdale Road/Kimmage Road Lower
- Mount Argus View/Kimmage Road Lower
- Harold's Cross Road/Kimmage Road Lower

Bus stop design

A major concern throughout the Proposed Scheme is the width of the bus stop islands that are proposed and the total lack of bus stop islands in the southern sections. 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.

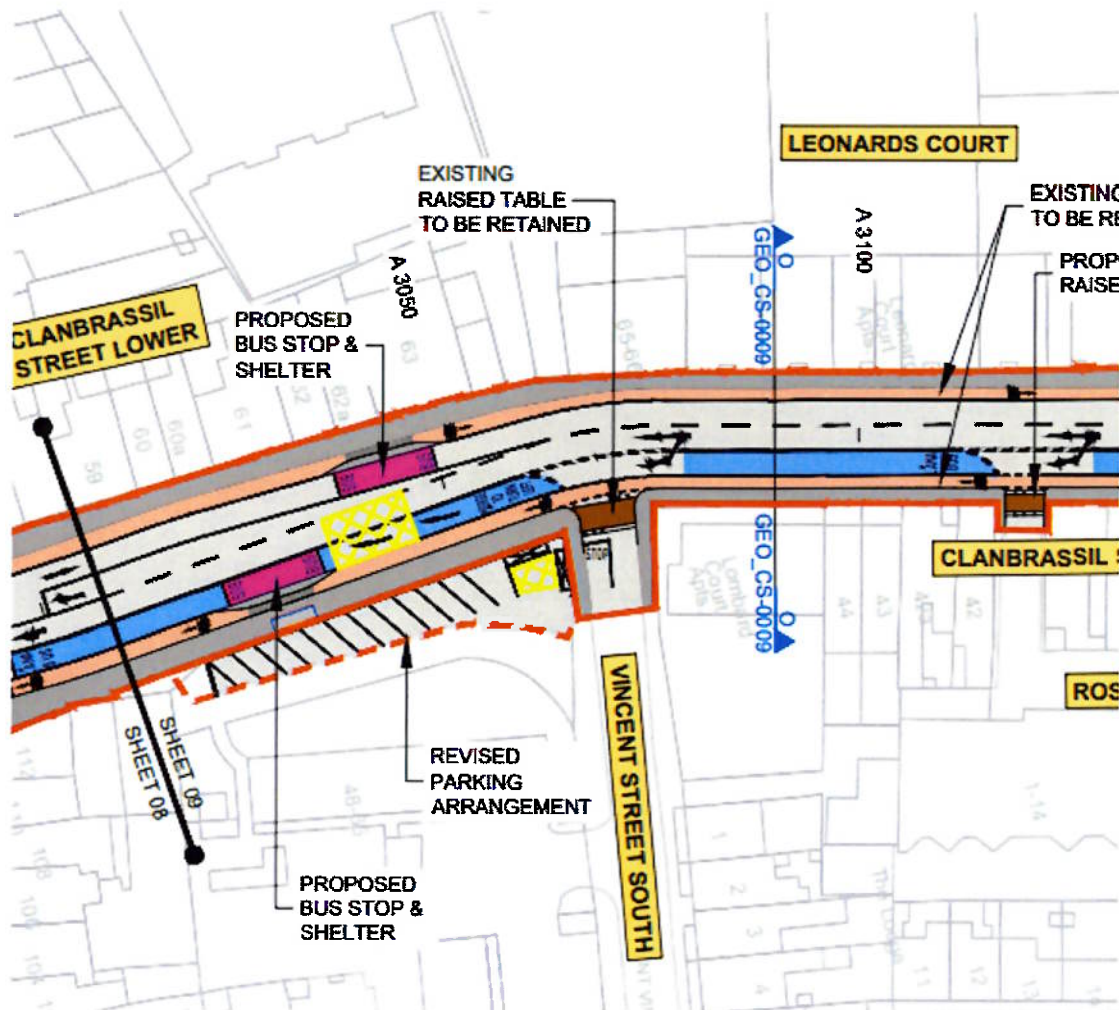


Figure 2 Bus stop with inadequate space to avoid conflict

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 4 shows a much safer design on ROAD where the cycle track is routed behind the bus shelter.

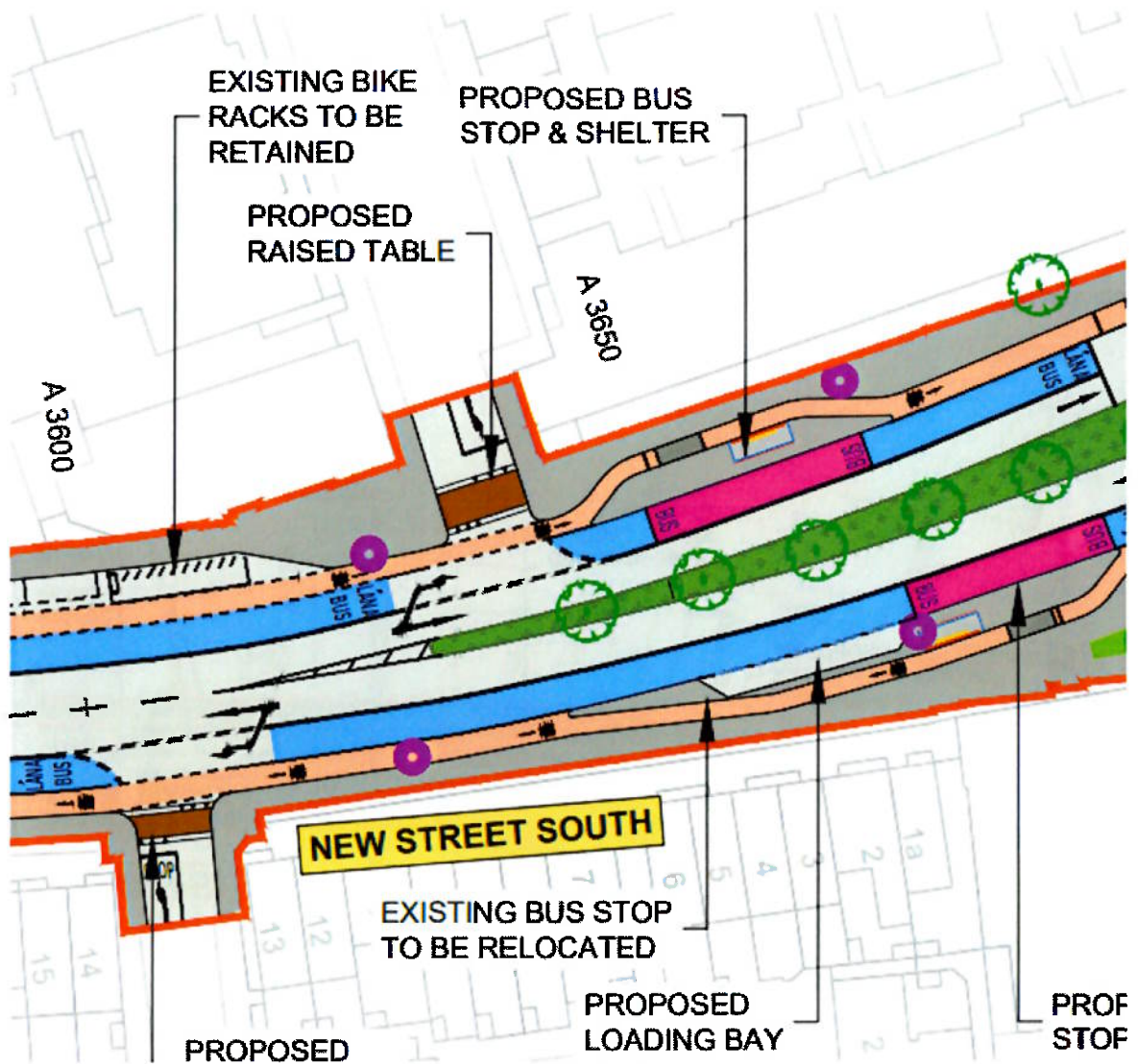


Figure 3 Example of a safer island bus stop design

Pedestrian crossings

Some 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”.

These junctions are clearly not in compliance with DMURS:

- Mount Argus View/Kimmage Road Lower
- Harold’s Cross Road/Kimmage Road Lower
- Harold’s Cross Road/Parkview Avenue

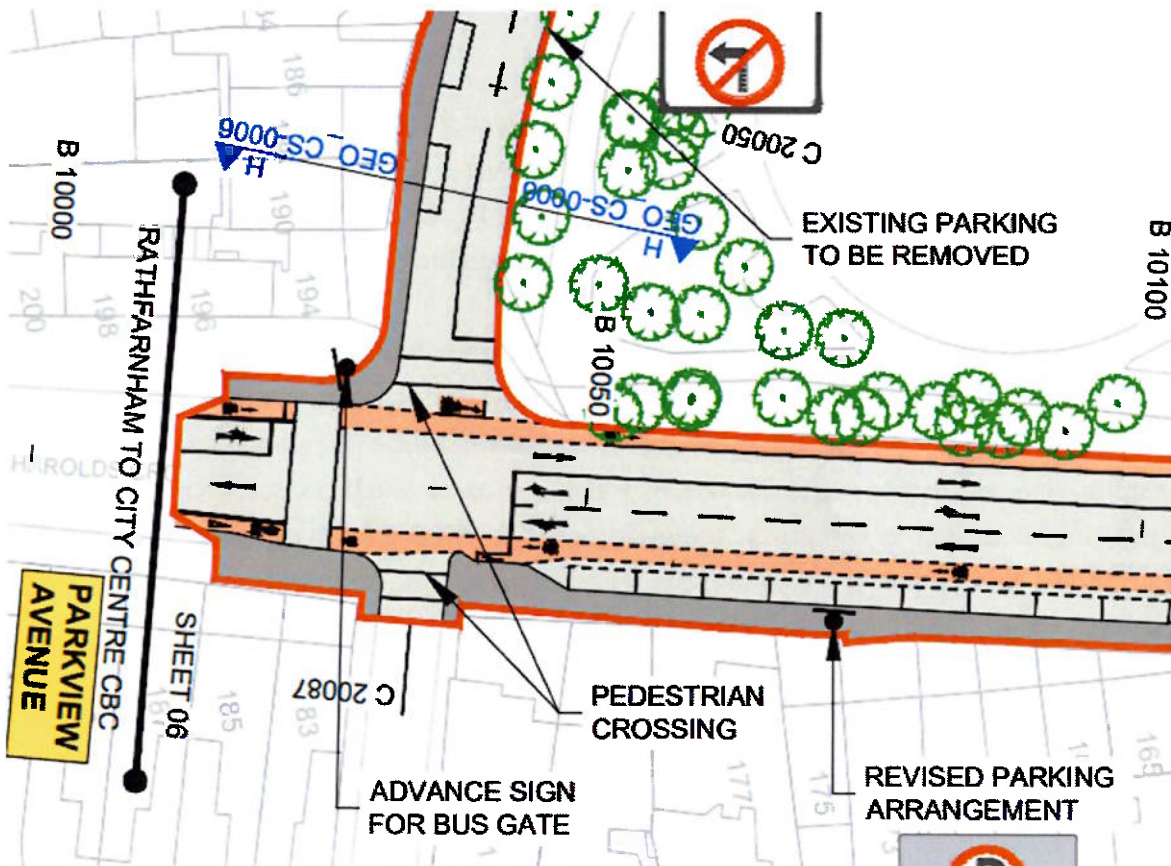


Figure 4 Junction without crossings on all arms

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 considered 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 and 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.

Segregation of cyclists and motor traffic

The Proposed Scheme lacks segregation of cyclists from motor traffic along Ravensdale Park, Kimmage Road Lower, Sundrive Road and Harold's Cross Road. It's unacceptable that the NTA would propose on-road unsegregated cycle lanes which have been proven to be ineffective and unsafe. We request that these sections be redesigned to segregate cyclists properly from general traffic.