Our Case Number: ABP-317742-23

An Bord Pleanála

Dublin Commuter Coalition
5 Abbeyfield
Killester

Date: 12 October 2023

Re: BusConnects Bray to City Centre Core Bus Corridor Scheme
Bray 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

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

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ABP case ref: 317742

BUSCONNECTS BRAY 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.

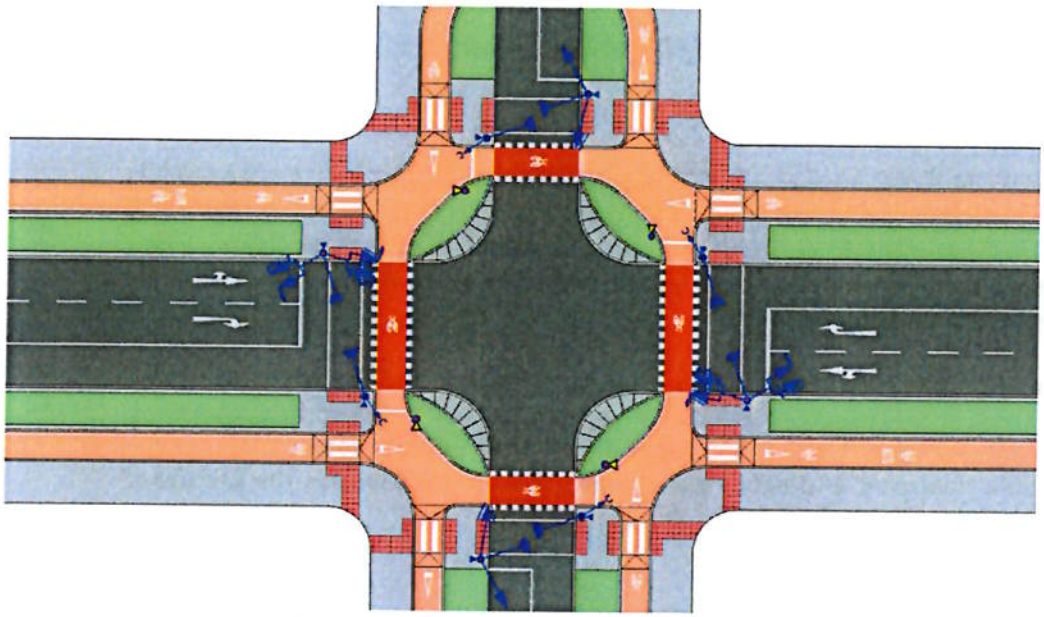

Figure 1 Protected Junction TL501 from the NTA's Cycle Design Manual

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

- Wilton Terrace
- Mespil Road
- Wellington Place
- Herbert Park
- Belmont Avenue
- Beaver Row
- Eglington Road
- UCD
- Dublin Road/Corbawn Lane
- Dublin Road/Old Connaught Avenue
- Dublin Road/Chapel Lane
- Dublin Road/Upper Dargle Road

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".

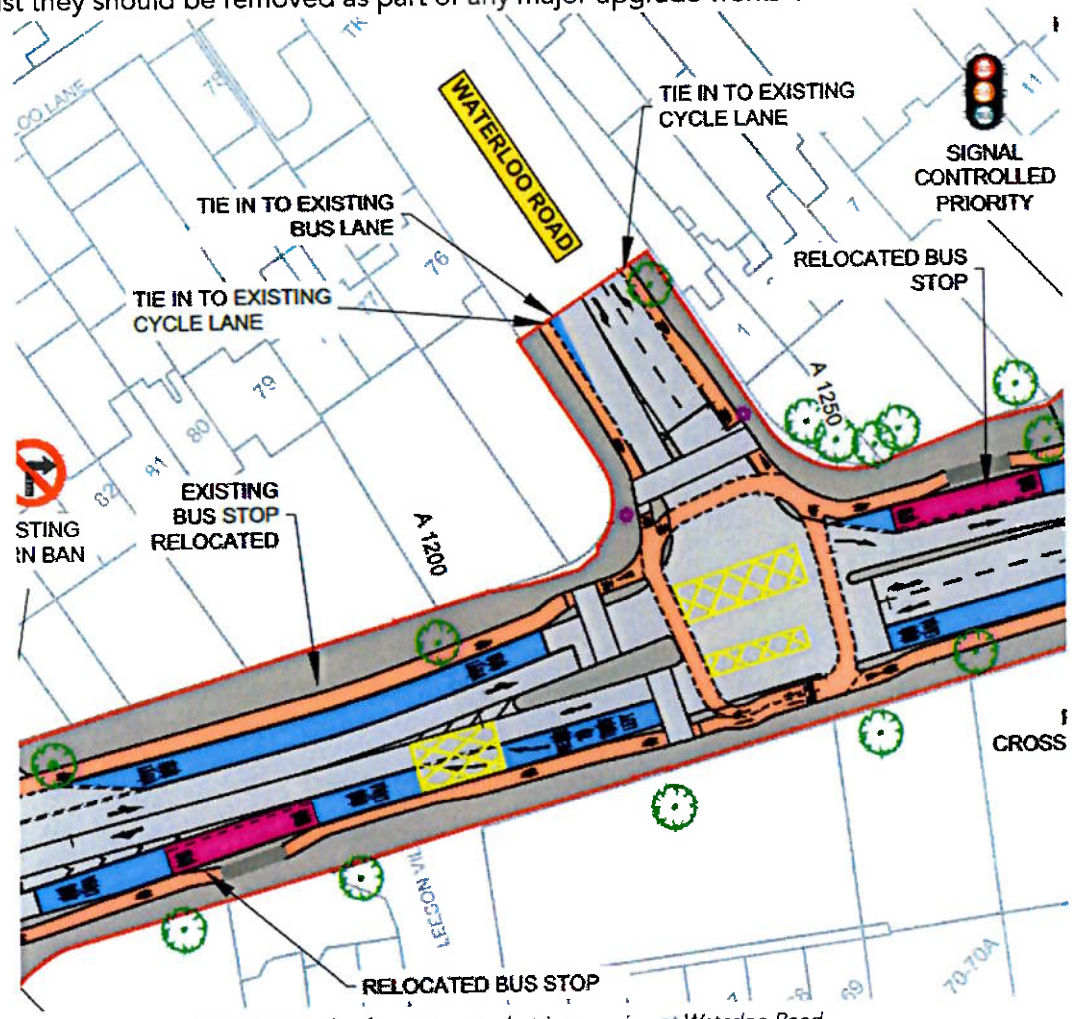

Figure 2 Example of two stage pedestrian crossing at Waterloo Road

The following two-stage pedestrian crossings are clearly inconsistent with the Design Manual for Urban Roads and Streets:

- Leeson Street/St Stephen's Green junction
- Leeson Street Upper/Sussex Road - north and south junctions
- Waterloo Road/Leeson Street junction
- Anglesea Road/Stillorgan Road junction
- RTÉ/Teresian School crossing
- Airfield Park/RTÉ/Stillorgan Road junction

- Nutley Lane/Stillorgan Road junction
- Foster's Avenue/Stillorgan Road junction
- The Rise/Stillorgan Road junction
- Booterstown Avenue/Stillorgan Road junction
- Mount Merrion Avenue/Stillorgan Road junction
- Old Dublin Road/Stillorgan Road junction
- Patrician Villas/St Laurence's Park crossing
- Stillorgan Park Road/Stillorgan Road junction
- Glenalbyn Road bus stop crossing
- N31/Farmleigh Avenue/Stillorgan Road junction
- Galloping Green/Belmont Terrace crossing
- Newtownpark Avenue/Leopardstown Road/Stillorgan Road junction
- Knocksinna crossing
- Springfield Park/Stillorgan Road junction
- Kill Lane/Stillorgan Road junction
- Westminster Road/Stillorgan Road junction
- Old Bray Road/Stillorgan Road junction
- Clonkeen Road/Stillorgan Road junction
- Johnstown Road/Bray Road junction
- Shrewsbury House crossing
- Orchard Square/Bray Road junction
- Garrison Mews/Bray Road junction
- Wyattville Road crossing
- Cherrywood Road crossing
- M11 J5/Dublin Road junction

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".

These junctions are clearly not in compliance with DMURS:

- Leeson Street Upper/Sussex Road - north and south junctions
- Burlington Road/Leeson Street Upper junction
- Waterloo Road/Leeson Street junction
- Foster's Avenue/Stillorgan Road junction
- The Rise/Stillorgan Road junction
- Booterstown Avenue/Stillorgan Road junction
- Mount Merrion Avenue/Stillorgan Road junction
- Trees Road Lower/Stillorgan Road junction
- Old Dublin Road/Stillorgan Road junction
- Springfield Park/Stillorgan Road junction
- Kill Lane/Stillorgan Road
- Bray Road/Stillorgan Road junction
- Clonkeen Road/Stillorgan Road junction

- Johnstown Road/Stillorgan Road junction
- Orchard Square/Bray Road junction
- Lower Road/Dublin Road junction
- M11 J5/Dublin Road junction

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.

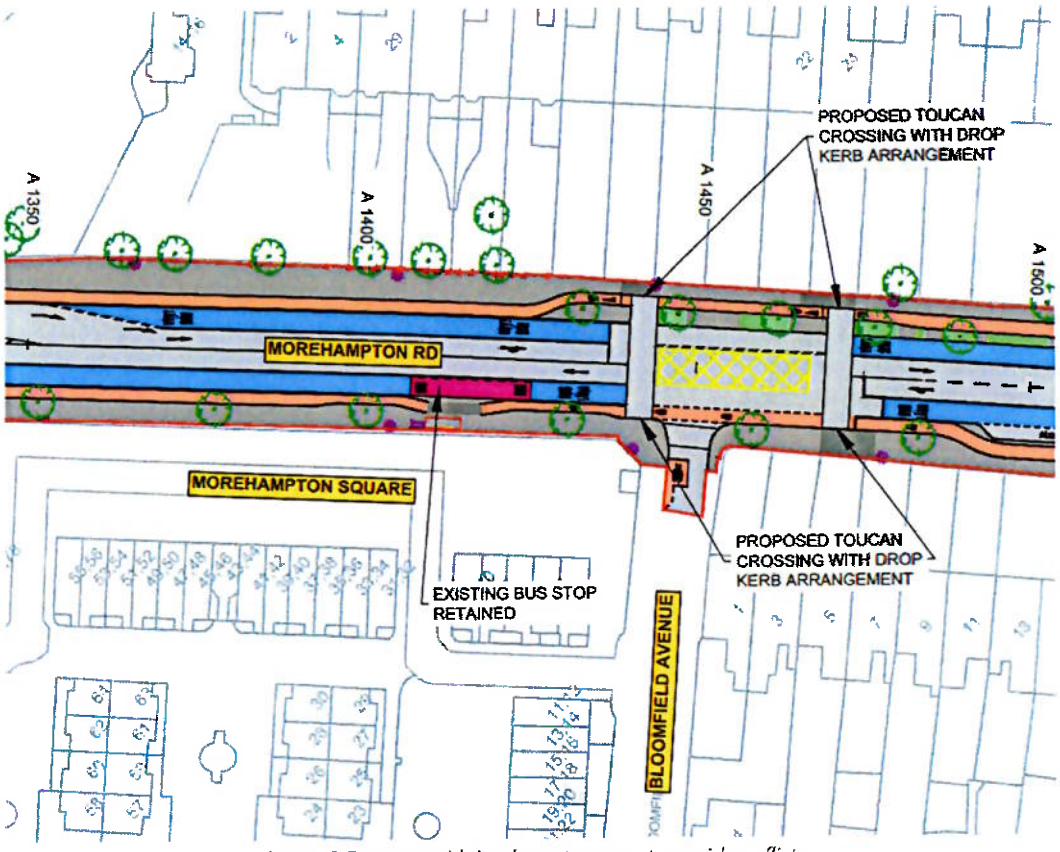

Figure 3 Bus stop with inadequate space to avoid conflict

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

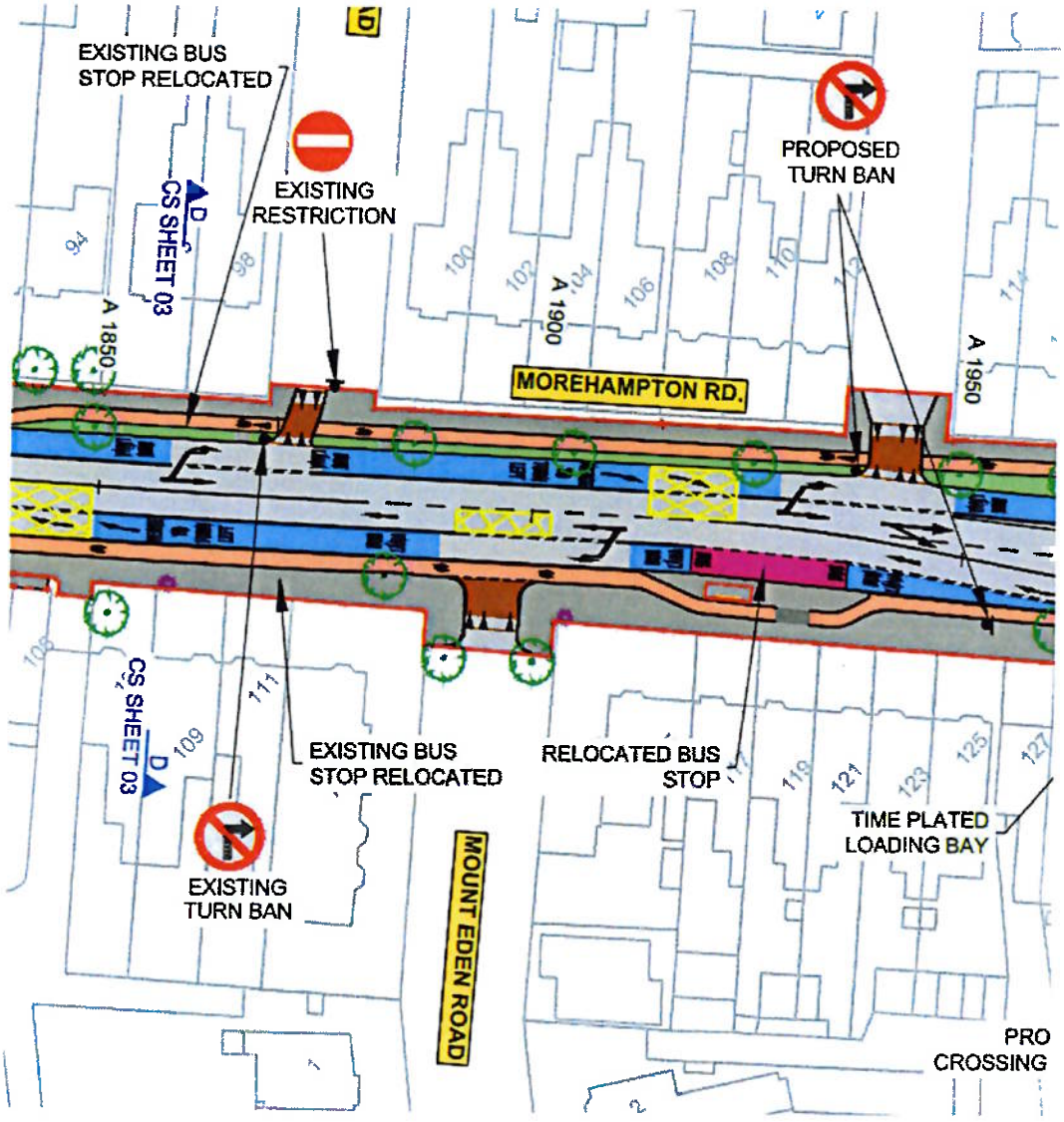

Figure 4 Example of a safer island bus stop design

Shared space

We recognise that similar commentary criticising the excessive use of shared space for 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-accompli 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.

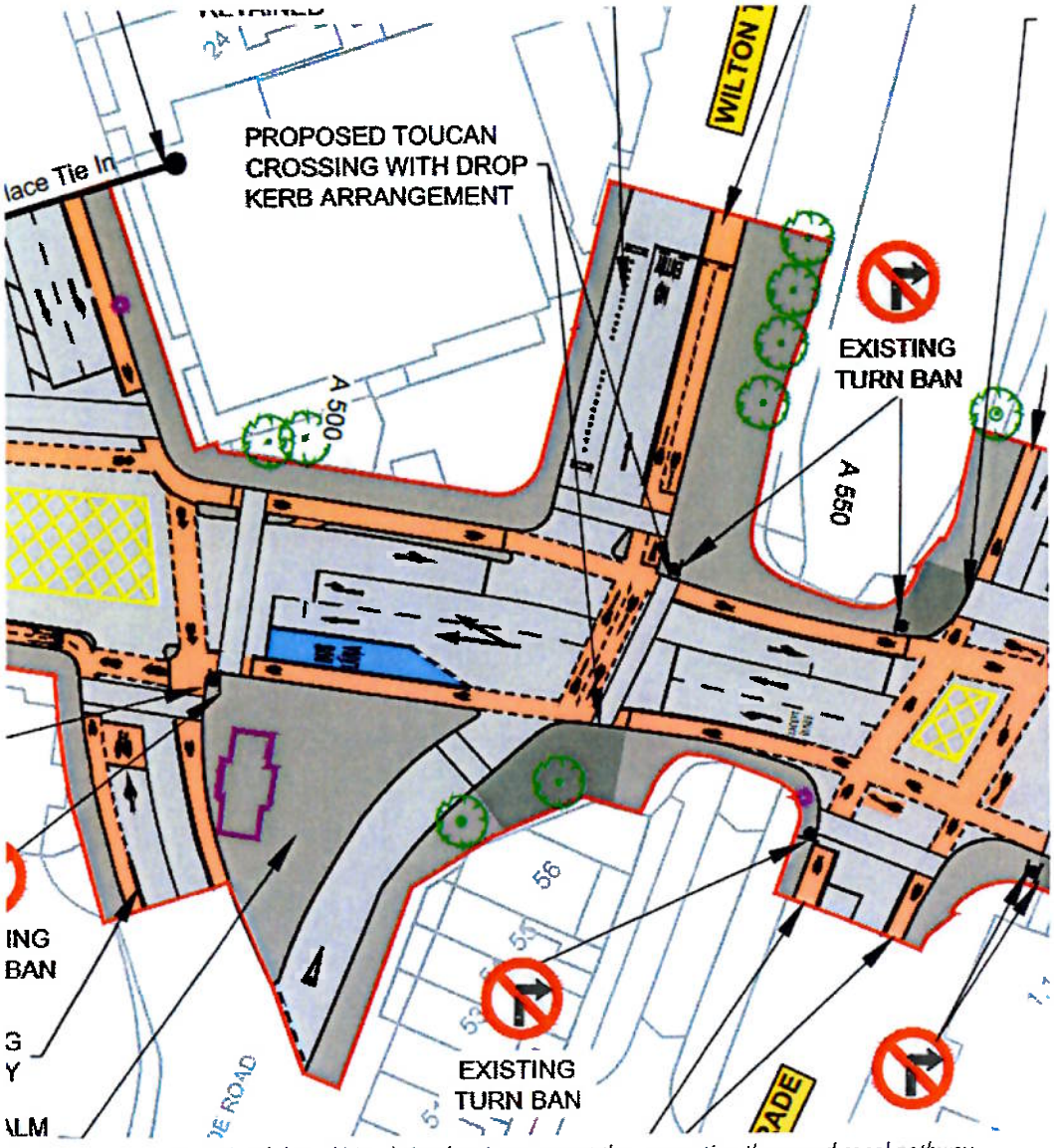

Figure 5 Example of shared bicycle/pedestrian space at the connection the grand canal pathway

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.

List of shared space:

- Adelaide Road/Leeson street junction
- Belfield Overpass
- Dublin Road/Shanganagh Road junction

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 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.

Slip Lane removal

We welcome the significant removal of slip lanes across the entire proposed scheme. Article 4.4.3 of DMURS states that designers should omit slip lanes wherever possible, noting they add very little additional capacity but are highly disruptive to pedestrians and cyclists.

Article 2.2.2 of DMURS lays out the Hierarchy of road users; as we know, one of the biggest risks to vulnerable road users in road traffic accidents is speed. Slip Lanes allow vehicles to take corners onto slower roads at much higher speeds, increasing risk of death or significant injury to a pedestrian should they be hit. Additionally, slip lanes increase the crossing distances for pedestrians and often leave them in a vulnerable position waiting on isolated traffic islands for crossing signals.

Dublin Commuter Coalition would oppose any proposed alterations to the published plans that would seek to retain slip lanes in line with DMURS, the various road design manuals and development plans.

Roundabout removal

The third 'Safe System' principal in Ireland's Road Safety Strategy states:

"There is a shared responsibility amongst those who design, build, manage and use the roads and vehicles to prevent or reduce collision impacts, and those who provide post-crash response to mitigate injury"

Roundabouts are areas of significant conflict between pedestrians & cyclists with faster moving vehicular traffic. Article 4.4.3 of the Cycle Design Manual gives guidance on the design of a variety of protected junctions. Protected 'Dutch style' Junctions provide segregated lanes and signalised crossing for pedestrians and cyclists, unlike roundabouts, they also help to reduce vehicular transit speed through a junction and allow for advanced starts for cyclists and buses.

We welcome the removal of roundabouts throughout the scheme and would oppose any suggested alterations to retain roundabouts for the convenience of vehicular speeds. Article 2.2.2 of DMURS; the Hierarchy of Road Users clearly states that pedestrians' needs must be considered first and we request that guidance be followed by An Bord Pleanala.

UCD Interchange

The interface between cycling and buses at the proposed UCD bus interchange is not safe for all ages and abilities. This is a key section of the route for enabling

cycling among the large student population in UCD but the current design proposes buses crossing a section of unsegregated cycle lane. We ask that the Applicant redesign this section and provide full segregation between buses and cyclists.

Figure 6 Cycling and bus interface at the proposed UCD bus interchange

Shankill Village

The Proposed Scheme fails to provide any improvements for cycling in Section 3. In fact, it proposes removing the existing unsegregated cycle lanes completely without any replacement. This is completely at odds with the objective of the Proposed Scheme to provide safe infrastructure for cycling along the corridor.

Table 6.34: Section 3 Cycling Impact During Operational Phase

Location	Chainage	Do Minimum LoS	Do Something LoS	Magnitude of Impact	Sensitivity	Significance of impact
R837 Dublin Road: Loughlinstown Roundabout to R119 Shanganagh Road	A14050 - A15100	C	D	Low	Medium	Negative Moderate
R119 Dublin Road: R119 Shanganagh Road to Quinn's Road	A15100 - A15600	D	D	Negligible	Medium	Not Significant
R119 Dublin Road: Quinn's Road to Allies River Road	A15600 - A16250	C	D	Low	Medium	Negative Moderate
R119 Dublin Road: Allies River Road to Wilford Roundabout	A16250 - A17400	C	A	Medium	Low	Positive Moderate
Section Summary		**C**	**C**	**Negligible**	**Medium**	**Not Significant**

Figure 7 Impact of the scheme on cycling

Furthermore, it also fails to deliver any significant bus priority for most of Section 3 and relies purely on a set of bus priority lights to deliver bus priority over a section of 1.3km. Bus priority lights cannot be effective across the distances proposed in this section This is recognised in Appendix A4.1 Preliminary Design Guidance Booklet: "A bus priority traffic signal is not likely to operate effectively over a long distance with a large number of accesses for instance, or where a major junction is contained within this area."

We would like the Applicant to consider implementing bus gates in Shankill Village to deliver safe segregated cycling infrastructure as well as adequate bus priority between Loughlinstown Roundabout and Wilford Roundabout.