Dublin Cycling Campaign

Tailor's Hall

Back Lane

Dublin 8

D08 X2A3

15th November 2022

RE: Ballymun/ Finglas to City Center Core Bus Corridor

An Bord Pleanála Case No. 314610

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 that is 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 support the development of this project with the noted exception of the poorly designed and disappointing; Mobhi Road/Ballymun Road/Griffith Avenue Gyratory; Phibsboro Village; and Church St Section. These route sections need to be addressed comprehensively in light of National & Local development priorities, as we outline below. These Bus Connects corridors, if properly designed, have the potential to radically alter travel patterns throughout the Dublin region. However, without the necessary modifications, these proposed corridors will not deliver safe cycle routes and will not deliver on the cycling modal shift necessary, which is critical to ensure real modal change. All modifications to the proposals are possible via condition if the board or applicant are agreeable.

We request an Oral Hearing to discuss the issues around the junction designs and the other issues raised.

In this document we will refer to Scheme sub-divisions Section 1 to 7, as set out in section 4.5 of Chapter 04 of the Application.

1.1 Four Types of Cyclist

The goal 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. 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 of Dublin's existing cyclists are in this cohort or 'Strong and Fearless'
- 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

This project needs to satisfy criteria to attract people in the large 'Interested but Concerned' cohort to provide the modal shift necessary to fulfil the goals of the National Sustainable Mobility Policy.

The proposed cycling infrastructure in this project would, in general, significantly improve the existing situation. The cycle routes proposed can provide a route that will attract a portion of the 'Interested but Concerned' cohort. There are a number of reasons this project will enable more people to cycle:

1. Continuous kerb protected cycle tracks along most of the length of the project. A cycle route is only as good as its weakest link. Consequently, we are disappointed that no mainline cycling route is provided (besides 450m on Constitution Hill) from the Royal Canal to the River Liffey. Bus stop designs that mean people cycling never share the same space as buses. People cycling and 30 ton buses is not a desirable mix. It is a major perceived safety risk that prevents many people in Dublin from taking up cycling. This is a crucial element that must be retained in the final design.
2. Some protected cycle junction designs so people cycling aren't mixed with heavy traffic at large junctions.

However, we have major concerns about some of the proposed junction designs, and the fact that access side routes in many of the areas do not have any cycle infrastructure at all. We call on An Bord Pleanála to only permit the scheme with conditions that allay these concerns which are detailed below and in the attached Appendix.

2.0 General Comments on Consultation Documents

2.1 Existing Kerb Lines and Property Boundaries

It is disappointing, and a failure of the display material that the existing boundaries and features are not clearly shown on the GA drawings, to enable a full comparison with what is proposed.

2.2 Number of Cross Sections

There is an inadequate number of cross sections displayed in the documents to enable a clear picture to be drawn of the details along the route, the changing footpath and cycle track widths, and encroachment onto private property. Any reader of the material is required to make too many assumptions.

2.3 Shortcomings in Methodology

We have serious reservations regarding the methodology employed to assess the cycling infrastructure in this project. An assessment matrix in Appendix A6.1 Sub Appendix 4 – Impact Assessments, shows the criteria for the Level of Service (LoS) provided by junctions. There is no information on what literature was used to develop this (qualitative) methodology. The LoS should be ranked by the "Worst Case" rating of the various segments that encompass the LoS rating, not the average of LoS ratings of individual components of the route, which is what has been done. This is not good practice.

For the City section in below table from the TIA (Appendix 4), the aggregated Cycle Impact Assessment does not clearly reflect the reality of the sub standard cycle infrastructure provided by this project. The width (1.25m) is far lower than that of the minimum recommended width for a primary route in the Greater Dublin Area Cycle Network.

Table 6.25: Section 4 – Cycling Impact during Operational Phase

Locations	Chainage	Do Minimum LoS	Do Something LoS	Impact
R108 Constitution Hill and R108 Church Street Upper: R135 Western Way to R804 King Street North	A5900 – A6350	C	B	Low
R108 Church Street: R804 King Street North to Mary's Lane	A6350 – A6600	C	B	Low
R108 Church Street: Mary's Lane to R148 Arran Quay	A6600 – A6830	D	C	Low
Quiet Primary Cycle Route: R108 Constitution Hill to R148 Ormond Quay Upper	A6150 – A6830	D	C	Low
Section Summary		D	C	Low

2.4 No Integration with Greater Dublin Area Cycle Network in Phibsboro (Doyles Corner)

It is deeply concerning that Chapter 04 of the application "Proposed Scheme Description" Section 4.6.6 Integration fails to mention the "Greater Dublin Area Cycle Network Plan (GDACNP) (NTA 2013)." This Bus Connects project is a project that is marketed as a cycle infrastructure project: the designers must integrate the GDACN into their proposals.

Furthermore There is no east-west connection for cyclists in Phibsboro, disregarding the future cycling facility of C8 Route of Greater Dublin Area Cycle Network on the North Circular Road (NCR). Instead there are three vehicle lanes proposed on the NCR.

Figure 6 Greater Dublin Area Cycle Network Route C8 Unaccounted for in Proposal

3.0 General Comments on Designs

3.1 Side Road Access Designs

Dublin Cycling campaign would like to see clear provision included as part of these routes for preferential cyclists' access to all side road signalised junctions along the routes. This can be done by a combination of protected cycle lanes on the approaches to the signals, and ASLs inserted in front of general traffic

3.2 Buffer protection for Cyclists

We would like to see clear buffer space provided between the cycle track and the bus lanes along these routes, in line with the recommendations of the National Cycle Manual, Section 1.5.2. which clearly calls for 0.75m buffers where an adjacent motor traffic lane has a width of 3.0m and speed limit over 50km/h. This is the case on extensive lengths of sections 1 and 5. Priority must be given to cyclist and pedestrian space along with public buses.

3.3 Raised Crossings at Side Roads

We welcome the inclusion of raised crossings at unsignalised side road junctions. This will give greater safety and priority for pedestrians and cyclists

3.4 Cyclist Access to and from Cycle Track

We would welcome clarity on how cyclists wishing to cross the main route at any point to leave the cycle track, or alternatively access the cycle track from a side road access, will be accommodated. There are many journey origins and destinations on both sides of these routes all the way along, and clear direction needs to be given to cyclists and pedestrians in how to access these.

3.5 Junction Design

The NTA are proposing unproven junction designs for cycling that include traffic hazards that will put people cycling at unnecessary risk. In the EIAR Junction Design Report (Appendix A6.1 Sub-Appendix 2) the applicant states there are four junction types. From a cycling perspective, there are two junction types, Junction Type 1-3 and Junction Type 4.

Our preference, where possible, is for Junction Type 4, known as the Cyclops Junction, which follows the international standard pioneered in the UK. The key element for people cycling is that they cross the junction under green signals at the same time as pedestrians. Cyclists don't cross the junction at the same time as left-turning motor traffic. This eliminates one of the most frequent cycling / motor

traffic collisions, the 'left-hook'. As pedestrians and cyclists cross at the same time it improves junction efficiency and reduces wait times for all modes.

Junction Type 1-3, known as the Dublin-style junction, does not follow any international standard. It has been created by the National Transport Authority (NTA). People cycling will be crossing the junction at the same time as left-turning motor traffic. This can lead to 'left-hook' collisions for people cycling.

The Pedestrian Infrastructure Assessment criteria (EIAR Appendix 6.4.1) do not include the pedestrian crossing distance when assessing junction quality. Shorter pedestrian crossing distances are important for slower moving pedestrians like children and those with mobility impairments. The NTA's chosen junction design Type 1-3 has longer pedestrian crossing distances than alternatives, like Junction Type 4, typically 3-5m longer.

In previous design iterations of BusConnects core bus corridors the NTA have also proposed Dutch-style junction designs. It has similar properties to the Cyclops junction design. However, Dutch-style junctions do not feature in this application. This Dutch-style junction design has been used successfully for decades in the Netherlands, and is in use in 14 other countries worldwide. There are examples in Ireland. There is a Dutch-style junction in Wicklow town at the junction of R999 / Hawkstown Road, which was constructed two decades ago. Another example is the new junction at Drummartin Link Road / Lower Kilmacud Road in DLRCC.

The National Transport Authority will not live up to their responsibilities as a Road Authority under the Roads Acts by building unproven Junction Type 1-3. The only two examples of the NTA junctions Type 1-3 have safety issues. There are proven international standards that the NTA could use for all junctions on this project instead. An Bord must seek answers from the applicant to the following questions:

1. What evidence does the NTA have about the safety of their new junction design Type 1-3?
2. Why hasn't the NTA used an international standard junction design, which has been proven to be effective, such as the Cyclops (Type 4) or Dutch junction on all junctions in this project?
3. Why was pedestrian crossing distance not included in the Pedestrian Infrastructure Assessment in EIAR Chapter 6 (Appendix A6.4 page 2)?
4. How many proposed junction arms will have longer crossing distances for pedestrians?

In addition, junction improvements proposed and outlined in the Junction Design Report (Appendix A6.1, Sub Appendix 2) are in some cases not correctly described and in other cases, particularly in the City Centre, do not fulfil the design requirements as detailed in the 'Preliminary Design Guidance Booklet for

BusConnects Core Bus Corridors (PDGB) (NTA 2021)'. Summaries for the Connaught Street/ Phibsborough Road and Doyles Corner Junctions in the Appendix say, 'Junction is in compliance with the BusConnects Preliminary Design Guidance Booklet with respect to pedestrians, cyclists and buses' when there is no cycling infrastructure provided at all.

3.6 Minimum Width of Cycle Track 2m

Cycle tracks should be wide - the wider the better. This is particularly important given that cycle tracks should be inclusive, and allow easy use by cargo bikes, handtrikes and mobility scooters, without impeding others. A standard cycle track of 1.5m may be adequate for commuter cycling (individuals on standard bikes, cycling in single file) but a 2/ 2.25m track facilitates overtaking and allows for non-standard cycles, as well as allowing 2 people to cycle side-by-side eg parents cycling with smaller children or older children cycling to school with friends.

The proposed widths of cycling infrastructure throughout the scheme are simply not fit for purpose. Section 2.3 of the Written Report of Greater Dublin Area Cycle Network Plan, outlines the desired width of primary cycle routes as 2.5m - see table below.

Basis for Target Quality of Service

ROUTE TYPE	PRIMARY / NATIONAL	PRIMARY	SECONDARY
Cycle Volume Existing (3 hour peak period)	n/a	200 -1000	100-500
Target QoS - Width Factor	A+ Two abreast + overtaking Width = 2.5m	A+/A Two abreast + overtaking Width = 2.5m	A/B Single file + overtaking Width = 1.75m
Target QoS - Other Factors	A	B	B

Widths of cycle tracks were measured for this submission using ImageJ Software Analysis (Rasband, W.S., ImageJ, U. S. National Institutes of Health, Bethesda, Maryland, USA, https://imagej.nih.gov/ij/, 1997-2018.)

For example, the 1.45m (Figure 9) cycle track proposed in Section 5 (see specific comments below) is unacceptable on a road that has up to five lanes and a central median (see image).

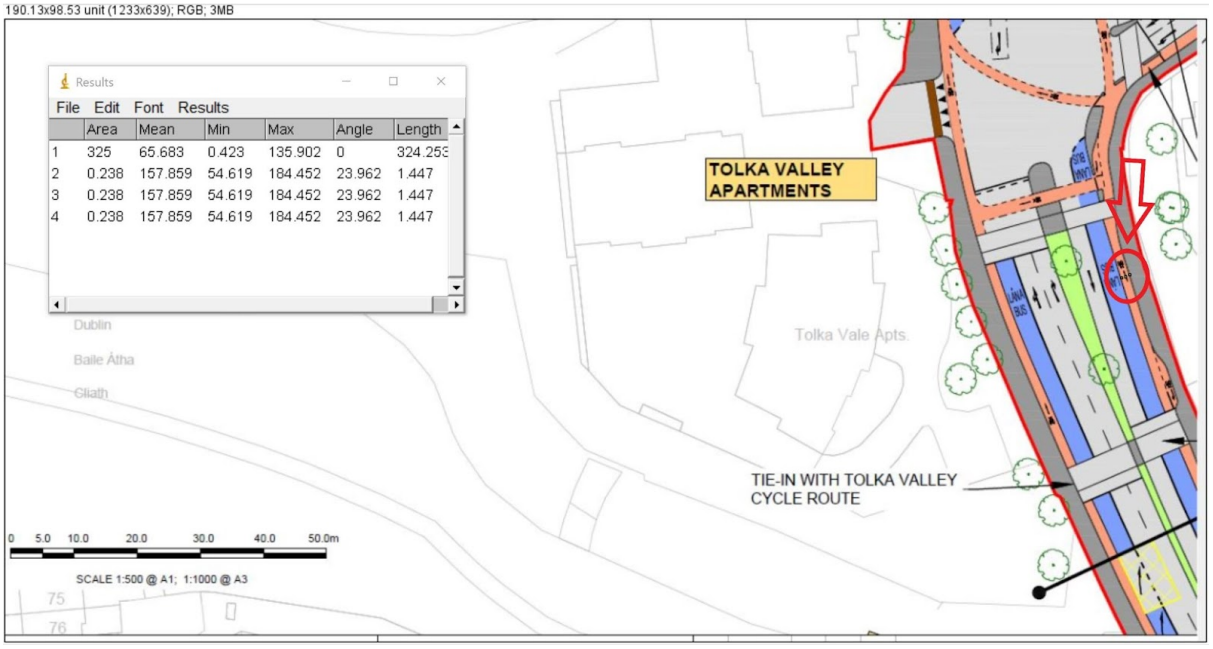


Figure 9 ImageJ analysis showing 1.45m width for Section 5 Finglas.

4.0 Specific Comments - Sections 1 and 2 Ballymun to Hart's Corner

4.1 Ballymun Village 30kph Speed Limit

We welcome the proposal for a 30kph speed limit in the central area of Ballymun Village, although this is only a limited approach, and ideally the 30kph zone area should be extended as the area is generally unwelcoming for pedestrians and cyclists.

Planting in a buffer space between motor traffic and cyclists should be considered as an alternative to median planting, or some of the median width allocated to a buffer, as pointed out in our general comments, above.

4.2 Pedestrian Crossings

We welcome the increase in the number of pedestrian crossing options in the Ballymun Village area and also close to Albert College. This will have the dual effect of encouraging greater walking (and cycling) and slowing the speed of through traffic.

4.3 Mobhi Road/Ballymun Road/Griffith Avenue Gyratory

We are disappointed with the overall design of this present gyratory, and that the opportunity has not been taken to alter traffic along the short Mobhi Road section of this area by confining it to buses and cycling only. This would have a major effect on the prioritisation of sustainable transport.

If private car traffic is diverted around the gyratory in both directions this would give clear priority to public transport and cycling, rather than requiring buses and cyclists to navigate the awkward gyratory.

Cycle track widths are well below the recommended minimum standards (see section 6.2); the proposed design increases the potential level of conflict between pedestrians and cyclists, and the opportunity to provide real prioritisation to bus transport has been lost.

It begs the question as to why this option was not assessed as part of the 'Design Alternatives' in Chapter 3 'Consideration of Reasonable Alternatives'? This design should be comprehensively reviewed.

4.4 Mobhi Road to Botanic Road

We would suggest that a very real opportunity has been lost in this area with a high level of school and sports ground activity. The proposed bus priority/gate at the north end of Mobhi Road is of very limited benefit to northbound bus traffic, and both cycle and pedestrian paths have been severely compromised in terms of the unacceptable below standard widths.
The opportunity to make Mobhi Road one way for much of its length to general traffic and to prioritise buses and cyclists in both directions, does not seem to have been assessed in the 'Design Alternatives', and needs to be explored further. Along with this, the option of banning all general northbound traffic from the Botanic Road junction does not appear to have been assessed, together with making Botanic Road one way northbound from that junction. The general standards proposed along this section of the route are unacceptable, although the increased number of pedestrian crossings is to be welcomed.

4.5 Botanic Road to Prospect Way

It is disappointing that there is no specific bus priority along this tight section, for approximately 250 metres, but we support the design option chosen, as being the best of a bad choice of options.

5.0 Specific Comments Sections 3 and 4 - Prospect Way/ Harts Corner to the Liffey

5.1 Harts Corner Gyratory

The proposed changes for this gyratory are broadly to be welcomed from a cycling, pedestrian, and bus perspective, although the critical element will be the phasing of traffic signals at the various junctions and the ability of pedestrians and cyclists to travel safely through the complex. The new proposed single move pedestrian crossings at Prospect Avenue on Prospect Way is an added positive feature.

5.2 Specific Comments Section 3 - Phibsborough Village

5.2.1 Phibsborough Village Not People-Focused Design

We object to the proposals in General Arrangement Drawings Sheets 15-18, which show Phibsborough Village. Phibsborough Village is the focal point for Cabra-Glasnevin area is home to approximately 59,000 people as of the 2016 Census. Phibsborough is designated as a 'Key Urban Village' in the Dublin City Development Plan (Chapter 7, 'City Centre Urban Villages and Retail, 2022). The applicant's proposals will significantly shape the public realm and desirability of transport options at the heart of this key urban village.

The proposed roads on drawings 15-18 around the Village include:

- Roads that prioritise private car traffic over cycling;
- Junctions that do not align with 'Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB) (NTA 2021)' in Appendix A4.1;
- Poor quality walking and cycling infrastructure with low quality of service.

Currently, the roads around Phibsborough Village are acutely car-dominated. The applicant's proposals place far too much emphasis on maintaining private vehicular movement and not enough on creating a high-quality public realm that prioritises and encourages walking and cycling.

After outlining the relevant policy we will show how the submitted EIAR document shows Phibsborough prioritises motor traffic capacity over creating people-focused places, in violation of local, regional and national policy.

5.2.2 Policy Review

National and local policies place a heavy emphasis on creating sustainable, healthy and people focused town centres:

- National Planning Framework-
    - NFP Policy Objective 4: 'Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.'
    - NFP Policy Objective 27: 'Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.'
- National Sustainable Mobility Policy, Page 5: 'Rebalancing transport movement in metropolitan areas and other urban centres away from the private car and towards active travel and public transport.'
- Places for People - the National Policy on Architecture (2022): 'The built environment requires significant investment to meet current and forecast population growth (5.7m people by 2040). Therefore, Ireland must: repurpose (and reuse for housing) existing buildings, public places and infrastructure, adopt new construction techniques and materials, improve living standards and accommodate new developments, all while making the transition to a sustainable, circular economy and society'
- Design Manual for Urban Roads and Streets (DMURS): DMURS focuses on 'streets as attractive places, whether new or existing. It seeks to encourage designs appropriate to context, character and location that can be used safely and enjoyably by the public'. Phibsborough Village is one of those places that needs to rebalance away from movement to place (section DMURS 3.2.1) because of its context as an urban centre.
    - Section 3.4.2 of DMURS talks about how some level of traffic congestion is to be expected in urban centres to avoid over-sizing junctions or heavily prioritising clearing queuing cars versus prioritising people walking or cycling.
    - Section 4 of DMURS prescribes design elements that should be used / avoided in order to promote people focused places in urban centres.
- Traffic Management Guidelines (2019): From section 1.3 of the traffic management guidelines:
    - 'It is only in the last few decades that the car has come to dominate every street. Streets are (or ought to be) living spaces, an integral part

of the community and the focus of many activities that link together people's lives. The way in which streets are managed and used promotes or discourages a sense of community and makes them an attractive or unattractive place to live. While certain levels of traffic for access and serviceability can often be accommodated, increasing pressure for parking and movement capacity for vehicles at the expense of other considerations has diminished the vitality and attractiveness of many areas. This imbalance must be reversed if urban communities are to revive and prosper. Planners and engineers must take the lead in this process.'

    - Page 20 highlights the need to break the vicious 'predict-and-provide' cycle of providing ever increasing car capacity to reduce motor traffic congestion while simultaneously reducing quality of service for active travel and public transport. Instead it highlights the need to manage travel demand to reduce the dominance of cars in sensitive areas such as town centres.

- Dublin City Public Realm Strategy 'Your City Your Space': 'Connections: The public realm should be legible, connected and permeable and designed to encourage people to walk and cycle to their destinations (schools, shops, work, playgrounds etc.) and to easily access public transport. This will encourage and enable people to be physically active in their daily lives.'

- Dublin Development Plan (2022-2028) Chapter 7 designates Phibsborough Village as a 'Key Urban Village'.

    - It states: 'The development of high quality urban environments in Key Urban Villages is essential so that they are places where people want to live and so that they become attractive destinations which can be accessed by walking, cycling and public transport'.

    - Chapter 8, Sustainable Movement and Transport, Objective SMTO8 'Cycling Infrastructure and Routes' states: '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.'

- It must be ensured that this BusConnects scheme is coherent and consistent with the Dublin City Development Plan.

5.2.3 30kph Speed Limit

While the proposed 30kph speed limit in Phibsborough Village is to be welcomed, it does not go far enough, and is severely limited, and needs to be extended

further. With the national review of Speed Limits being undertaken at present as part of the RSA Road Safety Strategy, it is likely that a blanket default 30kph speed limit will be extended for all of the Dublin metropolitan area including Phibsborough Village.

5.2.4 Cycle Quietway via Royal Canal Bank

We do welcome the proposed development of this quiet route free from through traffic, which will be attractive for leisure and beginner cyclists in particular, and opens up pleasant areas of the north city to leisure cyclists.

The 2013 Greater Dublin Area Cycle Network Plan calls for quiet routes: 'It would be difficult to achieve a high Quality of Service for cyclists on all these main traffic routes. (It is therefore desirable to identify alternative streets for cycle routes where possible to cater for risk-averse cyclists).' Thus while we welcome it, a quiet route must be seen as a complementary to main cycle facilities, not the main route itself.

The new proposed bridge crossing of the Royal Canal and the historical reopening of a tunnel under the North Circular Road will provide safe passage of cyclists, as will the cycle link to the North Circular Road itself. However the proposal scheme fails to provide appropriate interventions to ensure Quiet Streets are actually designed to signal that a cyclist has the priority: Royal Canal Bank is currently used as a rat-run from NCR to bypass the busy Phibsborough, and no restriction of non-resident private car traffic is evident on the plans.

Filtered permeability and optical narrowing (as shown in the figure below) can assist in preventing rat running. Optically narrowing the road is used frequently in The Netherlands and Belgium to slow motor traffic and provide a safer environment for vulnerable road users. Carriageway narrowing is supported in DMURS Section 4.4.1. In addition, signage and clear identification of options for cyclists will be critical to success of this route.

Finally, there is also a gendered aspect to creating this quiet route: Forming a route aimed at directness for commuters ignores the multiple-trip chains (e.g.shopping combined with relative visit) shown by research to be more commonly carried out by women. Men more frequently commute to work and back in a single trip. The proposed route gives no direct access to Phibsborough village for errands or socialising.

5.2.5 Air quality

We accept that the continuation of the bus corridor through Phibsborough Village is paramount. However, under the preferred scheme cyclists will be required to share this facility with buses, essentially all the way to and from Broadstone. These arrangements, which prioritise private vehicle throughput over active travel, will

need to be closely monitored if agreed upon, as the baseline air quality monitoring for this BusConnects scheme demonstrated that air quality at Phibsborough already breaches WHO limits. So, it is critical that future air quality levels are closely monitored and any remedial action necessary is taken to protect people's health.

If this arrangement for no formal cycle track along the main route from Cross Guns Bridge to Broadstone is implemented, it must be made clear by on-road markings and signage that cyclists are permitted to continue to use the bus lanes. Our members already report hostile behaviour from some bus drivers, and taxi drivers where people on bikes use bus lanes. So signage/ markings should be accompanied by appropriate driver training/ public awareness campaigns.

5.2.6 Linking to housing to west

The major established housing estates west of the Phibsborough Road have the potential to feed cyclists into this route heading both north and southwards. A clear cycle link must be established between Phibsborough Village and the new two way proposed route on Prospect Road to guide cyclists heading northwards to Finglas or Ballymun.

5.2.7 Phibsboro summary

This is to miss a rare opportunity presented by this major infrastructure project, in a time of climate emergency, to support national and local policies, and shift away from the 'dormitory commuting' patterns of the last century towards a sustainable, liveable urban realm — based on active travel patterns — for a large area of Dublin city.

5.3 Section 4 Alternative Cycle Route via Back Streets

The proposed quiet streets route for cyclists from Constitution Hill via Coleraine St, Michan St etc to Ormond Quay, is a convoluted unattractive route, which is unlikely to be much used without major upgrades in the surface quality, overall appearance and safety improvements. It also does not lead to any of the river Liffey bridges, so also loses its attractiveness from that perspective as well.

The proposal scheme fails to provide appropriate interventions to ensure Quiet Streets are actually designed to signal cyclists have the priority.

We would strongly recommend the use of Optical Narrowing (as shown in the figure below) and filtered permeability to prevent rat running. Optically narrowing the road is used frequently in The Netherlands and Belgium to slow motor traffic down and providing a safer environment for people walking or cycling. Carriageway narrowing is supported in DMURS Section 4.4.1 Carriageway Widths:

Research from the UK has found that narrow carriageways are one of the most effective design measures that calm traffic […] The standard carriageway width on Local streets should be between 5-5.5m (i.e. with lane widths of 2.5-2.75m).

Figure 8 Example of optical narrowing of the road. The different colour bricks encourage everyone into the middle of the road, which tends to slow all traffic down.

We also note the potential to use the small laneway from Ormond Place to Ormond Quay as part of this 'alternative ' route has not been referred to in the 'Alternative Design ' commentary Section 3.4.1.3 of Chapter 3 'Consideration of Reasonable Alternatives'.

5.4 Section 4 Church St

In the meantime the existing limited cycle route protection on the main body of Church St is proposed to be largely lost, and cyclists must share facilities with the public buses and taxis for the majority of the section in the proposed bus lanes. This design deviates from the Draft (2021) GDA Cycle Network routing. At the same time significant road space is retained for on street parking, apparently for Garda personnel. The design of this section should be revisited, with a view to upgrading the cycling facilities as it is an approach to a major river crossing and a major active travel desire line.

6.0 Specific Comments Scheme Sections 5, 6 and 7- Finglas to Harts Corner

6.1 St Margaret's Roundabout to Church St Junction

The fully extended bus lanes along this stretch and all of the Finglas Bypass are to be welcomed. The 4 new proposed bus stops are close to housing access and the new arrangements to open access to these areas is a simple but effective proposal. But, we remain somewhat confused about the proposed design of the Church St junction, because there are major differences in the layout shown on Sheet 27 of the GA drawings, and Image 4.10 of the 'Proposed Scheme Description', including location of the bus stops, and actual cycle facilities proposed.
It is also unclear if there is a specific signal arrangement for cyclists crossing the Finglas Road at Church St.
This discrepancy between different Bus Connects documents at Church St junction must be clarified.

6.2 Wellmount Road to Harts Corner

It is regrettable that cycle track widths are sub-standard for long stretches of the Finglas Road e.g. between junctions with Wellmount Road and Tolka Valley Road where they measure only 1.45m. A width of 1.5m fails, as discussed below, to offer a good quality of service to people on bikes. This is disheartening to see where space for adequate widths is available in buffer or median strips e.g. B-2250 to 2400 and all along by Glasnevin Cemetery.

North of Tolka Valley Road, the indentation of cycle tracks could be modified to keep a greater length of track shielded from motor traffic by planted buffer sections.

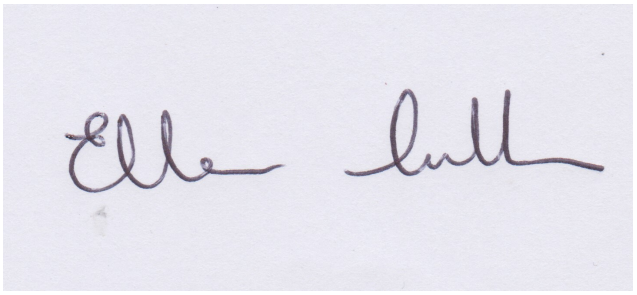
Remodelling of the Cemetery car parking opposite the Museum is to be commended, but at the southern end of the parking bay, pedestrians crossing the cycle track on a bend may conflict with people on bikes.

7.0 Conclusion

Dublin Cycling Campaign has major problems with this final iteration of the proposed Bus Connects corridors and Cycle Network proposals, for these routes from Ballymun & Finglas via Phibsborough, to the city centre. Our main concerns are, as outlined in detail above:

- Unacceptable cycle track widths and buffer protection in multiple areas of the scheme
- Lack of adequate cross-sectional detail to enable proper analysis of proposals
- Design of Gyratory at Mobhi Road/Griffith Avenue/Ballymun Road
- Design of Mobhi Road to Botanic Road section
- No cycle safe access to Phibsborough Village
- Poor quality cycling proposals along Church Street

We reiterate our request for an Oral Hearing in order to discuss and resolve these and other points raised in this submission.



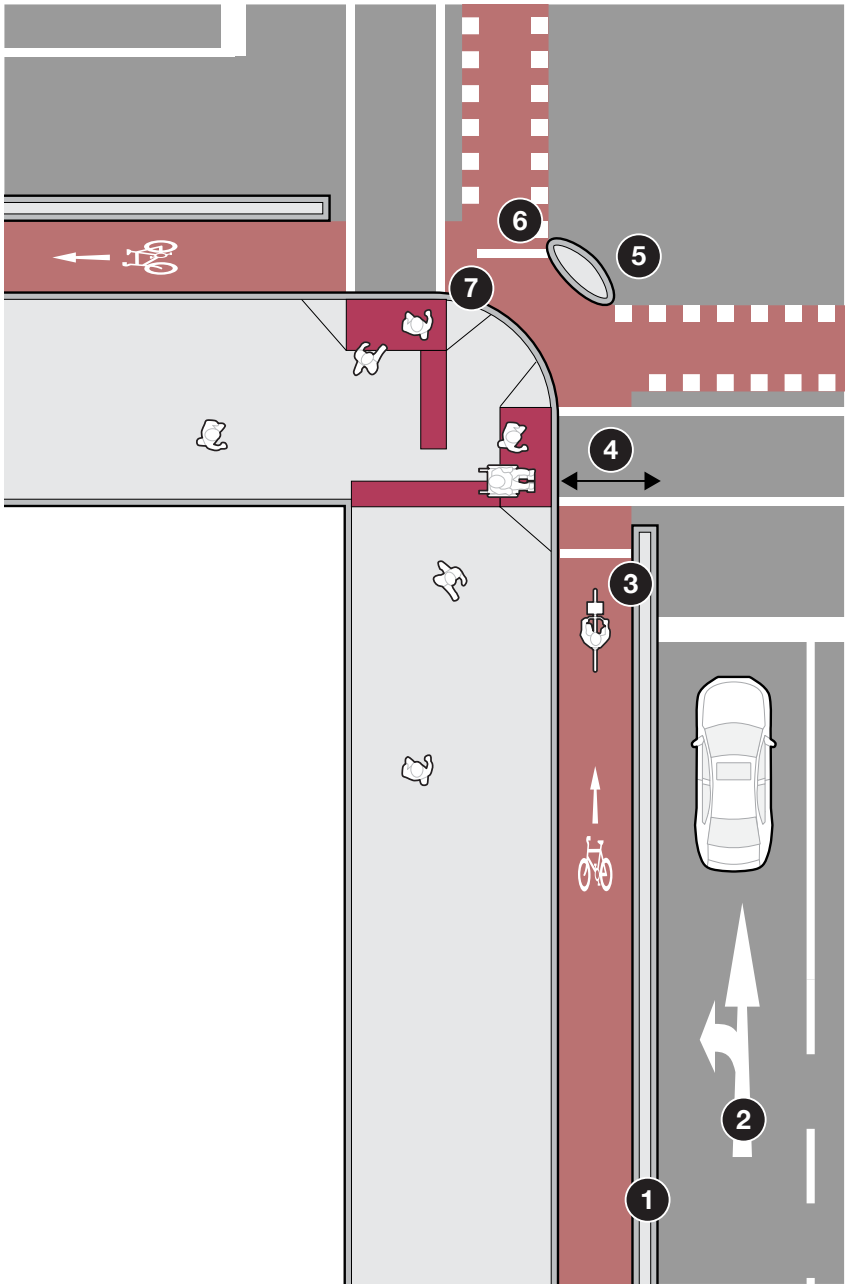
Ellen Cullen

Chairperson, Dublin Cycling Campaign

8.0 Appendix: Junction Design Explainer

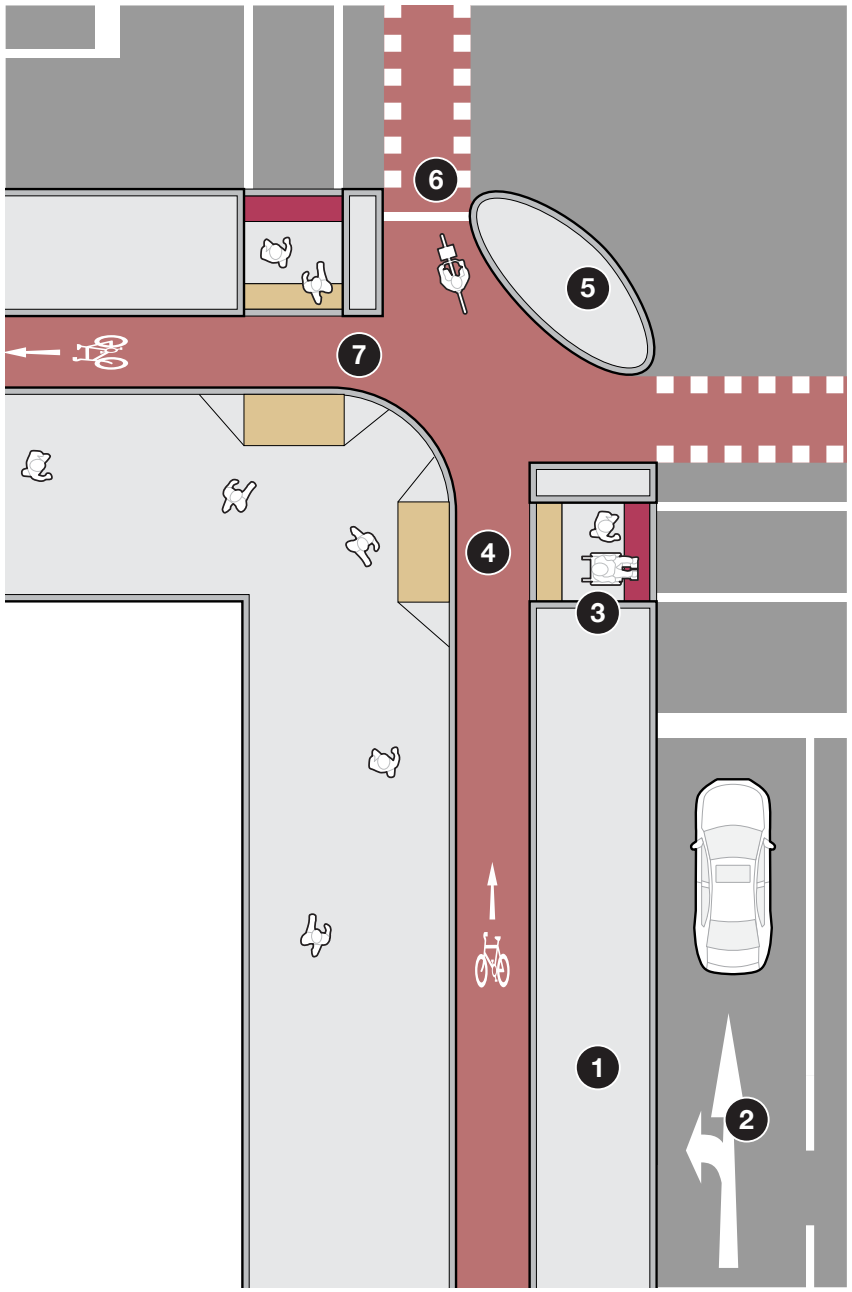
Overleaf and following pages

DUBLIN JUNCTION WITH CORNER ISLAND



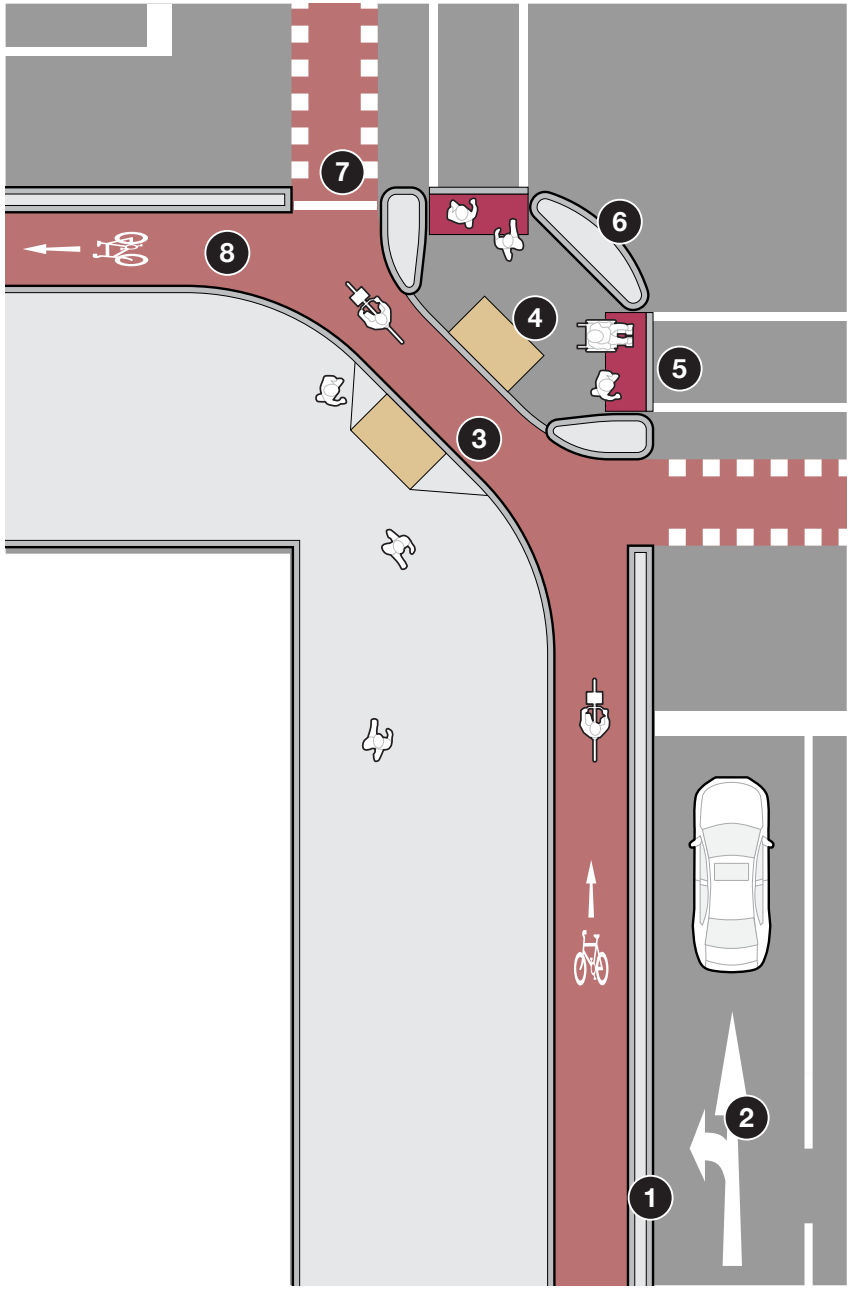
1. Raised kerb segregation
2. Left turning and straight ahead motor traffic lane
3. Stop line for cyclists
4. 2.5m approx.
5. Corner protection island
6. Stop line for right-turning cyclists (depends on junction signalling)
7. Left turning cyclist must stop when pedestrian crossing is green.

DUTCH JUNCTION



1. Horizontal segregation wide enough to provide safe space for pedestrian waiting area
2. Left turning and straight ahead motor traffic lane
3. Pedestrian crossing waiting area
4. Pedestrian crossing over cycle lane
5. Protective corner island
6. Stop line for straight-ahead and right-turning cyclists (depends on junction signalling)
7. Left turning cyclists never encounter signals

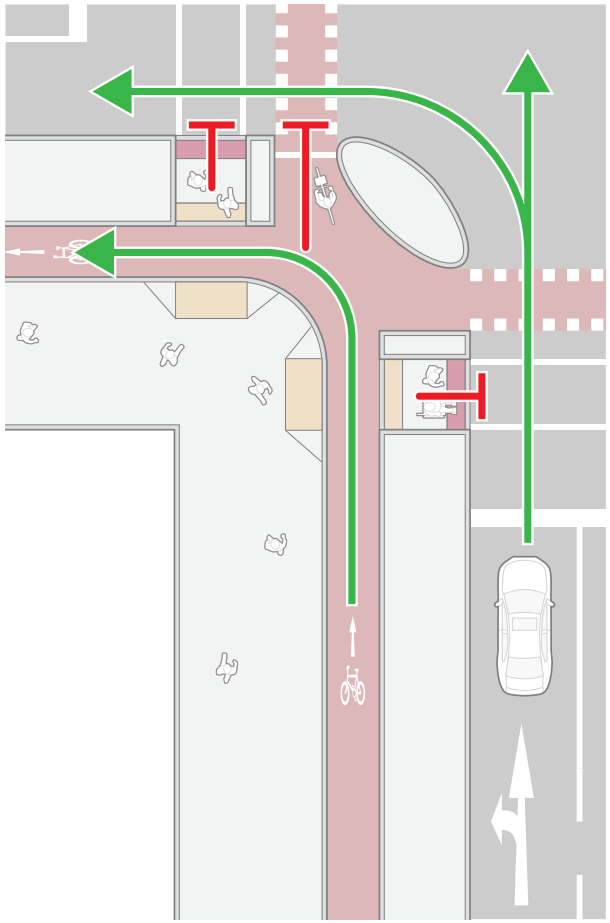
CYCLOPS JUNCTION



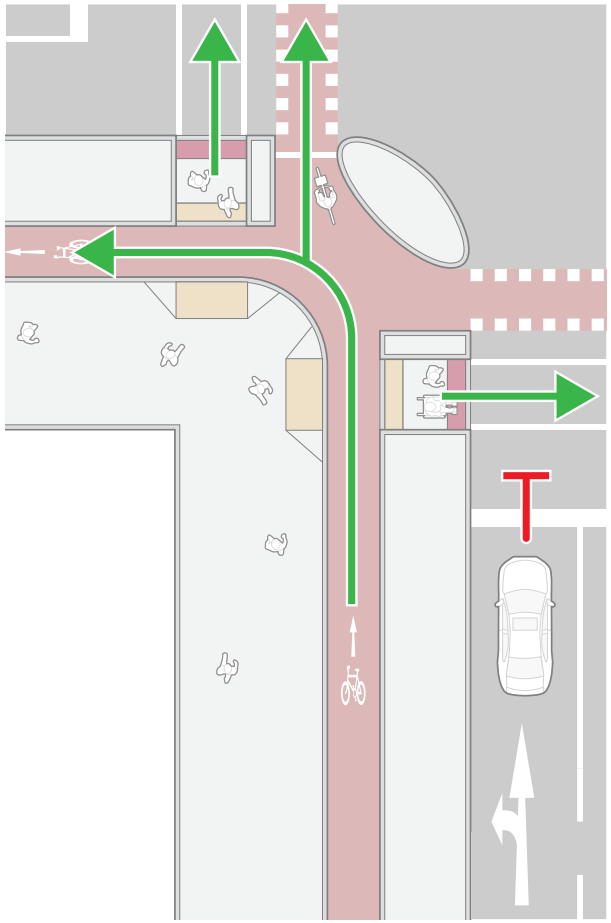
1. Raised kerb segregation
2. Left turning and straight ahead motor traffic lane
3. Pedestrian crossing point to pedestrian island
4. Pedestrian island
5. Controlled crossing across motor traffic lanes only
6. Protected corner island
7. Stop line for cyclists. Right-turns for cyclists can be made in a single phase
8. Left-turning cyclists never encounter signals

DUTCH JUNCTION MOVEMENT SEQUENCE

1 All motor traffic proceeds.
Straight ahead cycle & all pedestrian traffic is held.
Left turning cycle traffic proceeds.

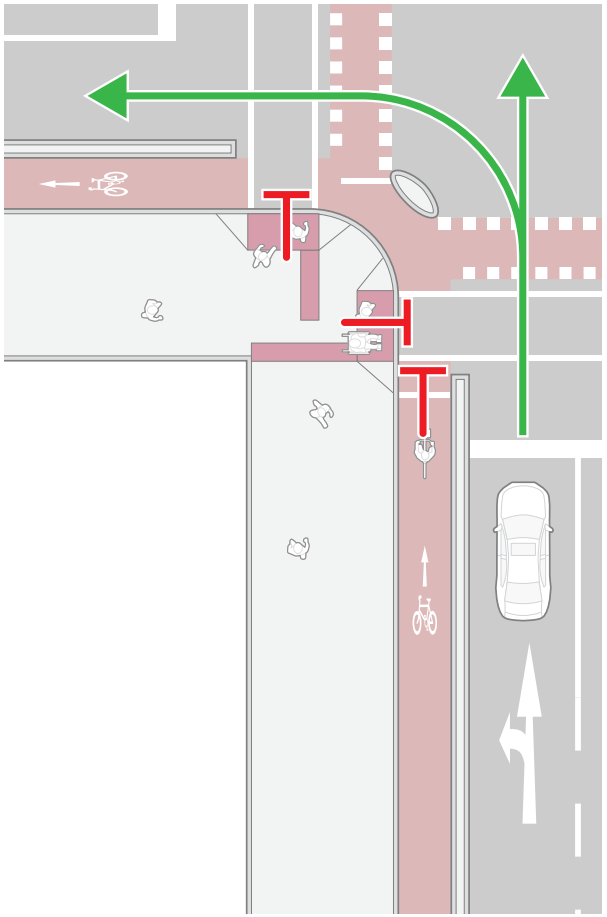


2 All motor traffic is held.
All cycle and pedestrian traffic proceeds.

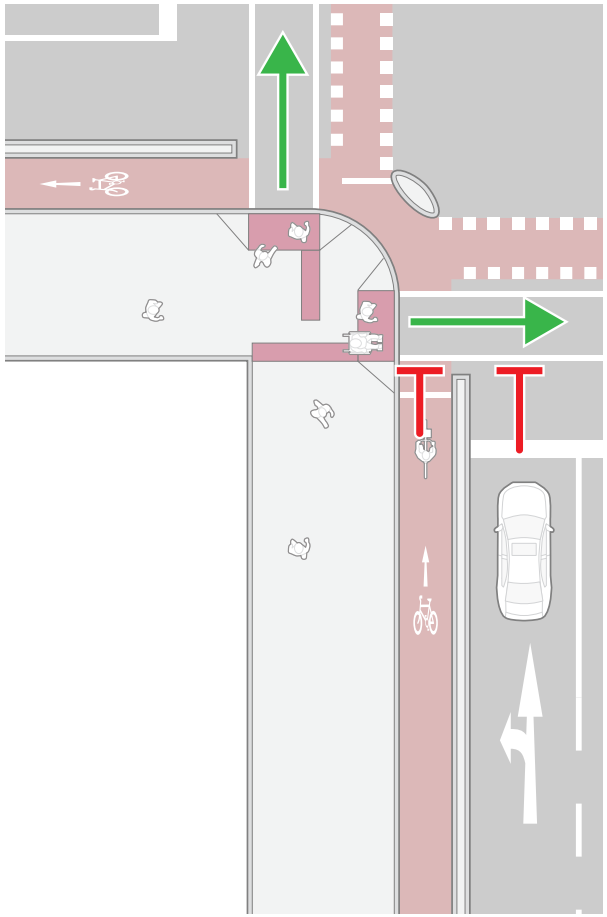


DUBLIN JUNCTION MOVEMENT SEQUENCE (A)

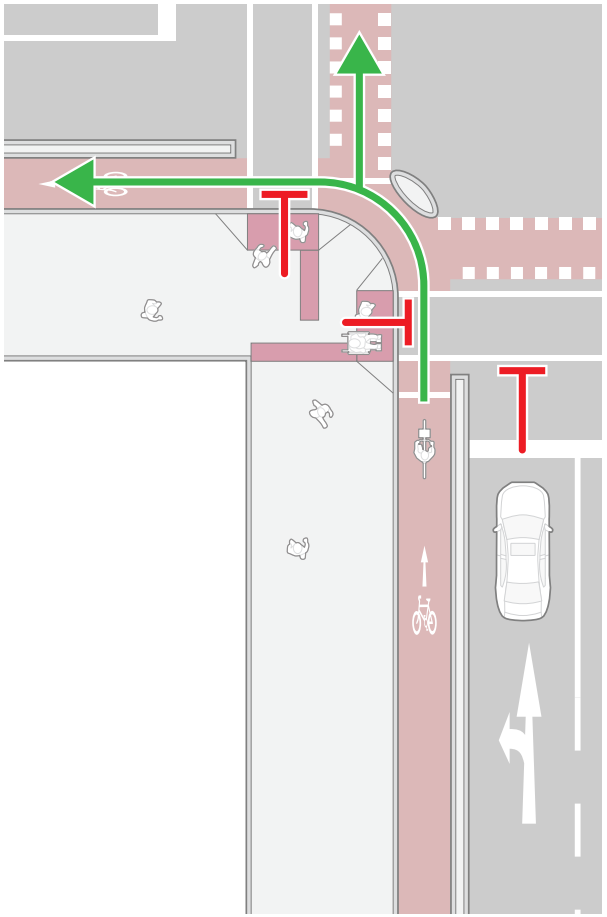
1 All motor traffic proceeds.
All cycle & pedestrian traffic is held.



2 All pedestrian traffic proceeds.
All motor & cycle traffic is held.



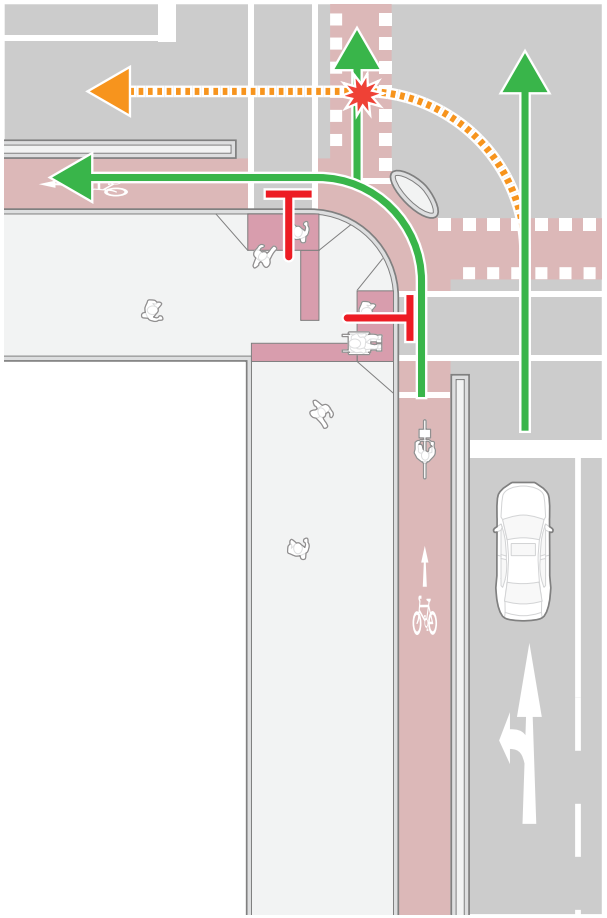
3 All cycle traffic proceeds.
All pedestrian & motor traffic is held.



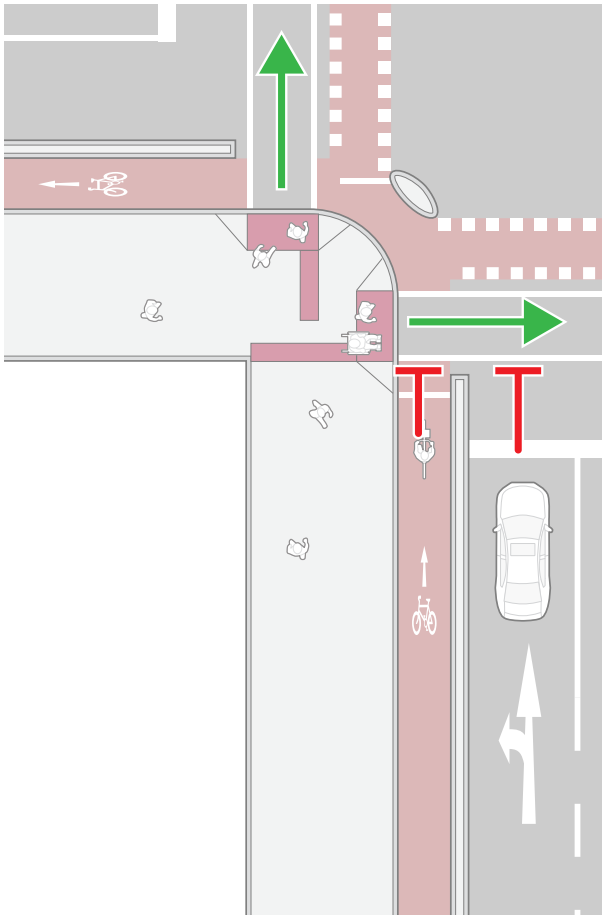
NOTE: Interupting the cycle lane with the controlled pedestrian crossing will add an extra 5m to the pedestrian crossing span.

DUBLIN JUNCTION MOVEMENT SEQUENCE (B) (NOT SAFE FOR LARGE OR BUSY JUNCTIONS!)

1 All motor & cycle traffic proceeds.
All pedestrian traffic is held.
High risk of conflict between cycle and motor traffic.

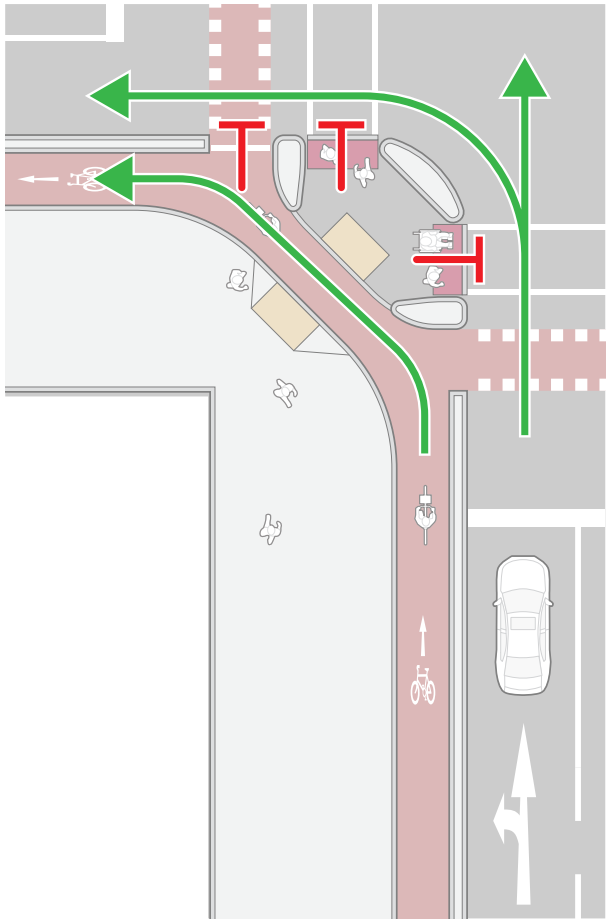


2 All pedestrian traffic proceeds.
All motor & cycle traffic is held.



CYCLOPS JUNCTION MOVEMENT SEQUENCE

1 All motor traffic proceeds.
Straight ahead cycle & all pedestrian traffic is held.
Left turning cycle traffic proceeds.



2 All motor traffic is held.
All cycle and pedestrian traffic proceeds.