



Core Bus Corridor 12: Rathfarnham

16th December 2020

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.

2.0 Cycling for All

The goal of the cycle routes must be to enable people of all ages and abilities to cycle. Cycling can be an option for almost everyone if we design for it correctly.

Cycling is a sustainable mode of transport and has many benefits as a modal choice both for individuals and the city if facilitated by infrastructure. The aim of the cycle facilities in this project should be to encourage as many people as possible to choose sustainable travel.

This project should aim to cater for a broad and inclusive population of people who could feasibly choose to cycle - including children travelling to school or extra-curricular activities, people making local trips or those considering cycling who are inexperienced currently but are considering incorporating cycling into their movements around the Dublin area. The BusConnects project delivery should provide adequate facilities to ensure this is seen as a comfortable and safe option.

3.0 General Points and Summary

Dublin Cycling Campaign broadly welcomes many of the features of the CBC 12 route from Rathfarnham to the City Centre. The latest round of consultation has presented a number of welcome changes along this corridor including:

- Improvements to junction design at, Grange Road/Rathfarnham Wood, Butterfield Avenue/ Rathfarnham Road, Rathgar Road/Grosvenor Road and Wexford Street/Cuffe Street/Kevin Street
- Additions of some island bus stops at points along the route
- Addition of some parking protected cycle lanes
- Change to the location of the bus gate at Rathmines to north of Richmond Hill
- Implementation of filtered permeability on Mountpleasant Avenue

4.0 Specific Remarks

However, there remain outstanding issues. Ensuring the safety of vulnerable road users is essential, and is paramount to the success of the BusConnects project.

Furthermore, reducing emissions from transport is a requirement of our national climate action plan, and is required to reduce the health effects that result from air pollution. Since the previous consultation period, globally the COVID-19 pandemic has occurred, bringing about radical change in our social behaviours, and has ignited an interest in cycling as a legitimate transport option due to the health and social benefits conferred. For many, our work and life patterns have changed, with a significant shift toward working from home for much of the working population, on either a full or part-time and often ongoing basis.

Despite notable progress in this design phase, there are adjustments to be made within this route that could significantly support the number of people who choose cycling, a sustainable transport option, for journeys along this route. We are especially disappointed that there remains no provision of cycling infrastructure on Rathfarnham Road, an important and direct route and primarily a residential area that links numerous localities. Similarly, Terenure Road East remains left without any safe cycling provision, with only a poor quality alternative proposed for linking the busy villages of Terenure and Rathgar.

The YourDublinYourVoice survey undertaken in August 2020 revealed one quarter of Dubliners intend to cycle to work post-COVID (an increase by 6% from pre-pandemic numbers), whereas only one fifth intend to drive. This reflects a shift

in our behaviours that should be incorporated throughout the BusConnects design, and has the potential to vastly improve Dublin. Provision of cycling facilities should mirror efforts by County Councils in Dublin who are also implementing schemes to promote active transport for primary and secondary school pupils.

5.0 Location Specific Issues

Cycling diversion via proposed structure on Owendoher River and no provision for people cycling on Rathfarnham Road

We note that the cycling diversion via a proposed structure crossing the Owendoher River remains since the previous consultation (subject to Environmental Impact Assessment). There is a very real risk that the proposed cycling diversion will not receive planning permission but that the remainder of this CBC route will be built regardless. This would be an absolute disaster for cyclists, who would be left with no safe route between Rathfarnham and Terenure.

Whilst this would serve as a pleasant amenity for some (such as families cycling with children or people cycling for leisure) linking up to the Dodder Greenway route/Bushy Park, the indirect route does not provide a viable or realistic option for people travelling in either direction between Rathfarnham and Terenure.

In addition, with little passive surveillance of the diverted route, this may feel intimidating to lone cyclists, particularly women at night.

We believe it is imperative that there is provision for cycling on Rathfarnham Road both north and south of the crossroads with Dodder View Road. We appreciate this may be a difficult objective to deliver based on the current road layout and geometry, but it is important that individuals choosing sustainable active travel modes are prioritized as part of the BusConnects project, and we believe that this can be delivered without limiting safe provision to the currently proposed diversion. In our most recent previous submission we suggested implementation of a one-way system, installation of a bus gate or bus priority signalling to also provide cycling facilities. We feel strongly that many cyclists will cycle on this section of the route, especially those who may find the remote diversion potentially intimidating and isolated. Rathfarnham Road is primarily residential, and failing to provide for people cycling will mean that residents living both on and immediately off Rathfarnham Road will have no safe routes to access local schools or services. For example,

Rathfarnham Road is bordered to the east with a large residential area, that comprises more than 160 separate households. These residents will have no safe way to leave this area by bike under these current proposals, which we feel is unfair and in opposition to the stated aims of the BusConnects scheme.

It should not be discounted that Rathfarnham Road is an enjoyable downhill cycle towards the City Centre and makes logical sense as a cycle route. In addition, given that cycle tracks resume at either end of this short stretch of road, it seems naive (and potentially dangerous) to proceed on the basis that many cyclists, rather than taking the direct route in and out of the City Centre, would instead divert themselves along a much longer and slower route (approx. 1.3km vs 730m) than that applicable to buses and cars.

We suggest the following options for your consideration at this section and implore you to provide facilities for people cycling within this section (listed here in order of preference):

Option 1 (avoids road widening/land take from properties):

Implement bus priority signalling or bi-directional bus gates from the Rathfarnham Village junction to the Rathfarnham Road/Rathdown Park junction. This would provide 2 x 1.5m cycle tracks and a shared bus/general traffic lane in both directions (2 x 3m) - total carriageway width required 9m. If bus gates are implemented, a bus gate would be required on both the north and south sides of the Dodder crossroads. Local access can be maintained, and through careful consideration of the bus gate location south of the Dodder, there would be no opportunity for through traffic to exploit these traffic calming measures by rat-running. The bus gate could potentially be timed to restrict motor traffic at times with highest traffic volumes, allowing through traffic to join the route at quieter times; however, our preference would be for the bus gate to operate on a 24 hour period.

Options 2 and 3 reflect proposed road widening in the current design. Our preference, as stated above, is Option 1, which we do not feel warrants increasing the road width. However, if it is not working in the context of the wider scheme not to widen the road, we suggest these measures which will encourage sustainable and active transport modes, ensure greater protection to vulnerable road users and

would result in less through traffic (with resultant negative effects of air and noise pollution) than what is currently proposed.

Option 2: If the road is widened (as proposed) to 12m, we suggest removal of one general traffic lane, providing space for bidirectional cycle lanes. The road layout would be: 2 x 3m bus lanes, 1 x 3m motor traffic lane, 2 x 1.5m cycle lanes (total width 12m). This would mean implementing a one-way system (i.e. one-way bus gate) on Rathfarnham Road whilst maintaining local access for residents.

Option 3: If the road is widened to a width of 12m, we suggest re-distributing the layout as currently proposed to provide: 2 x 1.5m cycle tracks, 2 x 3m traffic lanes and 1 x 3m bus lane that alternates between both sides of the road. Such a design is currently implemented on Taylor's Lane in Ballyboden. The bus lane could be provided on approach to junctions, so as not to impede the journey times of bus passengers. There are two pinch-points on Rathfarnham Road. The first runs from the junction with Rathfarnham Village (where the petrol station is located) to the junction with Rathfarnham Park, and the second where the road passes over the Dodder on the Terenure-side to the junction with Rathdown Park. We suggest that at these sections, no separate bus lane is provided, rather buses and general motor traffic share these lanes. Traffic signalling could ensure motor traffic is managed such that congestion does not impact buses moving through these sections.

Terenure Village

The alternative cycle route (along Bushy Park, Road, Wasdale Park, Wasdale Grove, Zion Road and Orwell Road) is a less direct route with more junctions. Many cyclists will want to access shops and cafes along Terenure Road East, so it is essential that safe cycling infrastructure is provided along this road. Furthermore, the alternative cycling route proposed is not afforded any segregation from motor traffic (apart from Orwell Road). This is problematic due to the nature of these roads - they are through routes and well established rat-runs to avoid traffic within Terenure Village and the right-turn ban currently in place at Terenure Cross. In the documentation published by BusConnects describing the emerging preferred routes for this round of consultation, Quiet Streets are described as routes where there is 'minimal general traffic other than car users who live on the street'. Without installing modal filters at points along the alternative route, this would not meet the criteria for a Quiet Street Treatment as set out by BusConnects.

In our previous submission we suggested a bus gate restricting westbound traffic into Terenure. Much of this traffic will already have been removed by the bus gates in Rathmines and Rathgar, so this would be a painless way to reduce the number of lanes on Terenure Road East from 4 to 3. Additionally, using bus priority lights, the road could be further reduced to two lanes between Terenure Village and Brighton Road, which would significantly reduce the amount of road widening needed to support cycling and public transport. We are still of the view that this is a better option than the design currently proposed.

Rathmines bus gate

As stated in our previous submission we strongly support the bus gate design for Rathmines. We feel that segregating people cycling from the relatively high number of buses is paramount to ensure this route (which links many schools, a town centre and sports facilities) can be used by all, comfortably and enjoyably. As such, we recommend installing segregation between the bus and cycle lanes. This could enhance the visual streetscape in addition to serving a vital function, and we feel a design similar to the wave delineators used in the DLR Coastal Mobility Route could work very well.

We note the relocation of the bus gate to north of Richmond Hill, and welcome the introduction of filtered permeability and removal of through traffic on Mountpleasant Avenue Lower. Without this measure, the bus gate on Rathmines Road would make this narrow residential road which is heavily used by pedestrians and less confident cyclists the default alternative through-road for through traffic being diverted from Rathmines Road. It has been suggested by some that this bus gate should alternatively be located to the south of Richmond Hill. This would enable access from the north direction to the car parking facility located on Richmond Hill (62 car parking spaces). If the bus gate is located to the north of Richmond Hill, there will be no car parking facility for vehicles arriving from the north, increasing the risk of cars being parked illegally and obstructing footpaths, bicycle tracks and bus traffic. This would also allow traffic coming from the north to loop back via Richmond Hill and Mountpleasant Avenue Lower, avoiding the need for u-turns in the main road. If this bus gate location is to be implemented, we would strongly recommend that filtered permeability would instead be implemented on the south side of the junction of Mountpleasant Avenue and Richmond Hill, to prevent through traffic using Mount Pleasant Avenue as a rat run.

We have some concerns over the junction of Wynnefield Road (at the Slattery's end) with regard to safety for people cycling. Closing this junction to through traffic would act as a safety measure for pedestrians and cyclists.

We are disappointed that bus stop islands have not been provided. The high volume of cyclists and buses makes this essential to avoid conflicts. The National Cycle Manual advises use of in-line bus stops in low to medium trafficked routes, neither of which reflect the current situation or proposed design for Rathmines Road. We believe there is sufficient room to provide bus stop islands and we have provided sample road layouts in our previous submission.

We note a potential pinch point where conflict between pedestrians and cyclists will likely arise - at the loading bay at 300 Rathmines Road. The loading bay is accommodated by a bypass cycling route, and this creates a pinch point between pedestrians and cyclists. We ask that you consider relocating this slightly around the corner on the Upper Rathmines Road.

City Centre

On Richmond Street, we do not think that the existing 3 lane layout needs to be retained now that a bus gate is to be installed on Rathmines Road. Because through traffic will be prohibited in Rathmines, the vast majority of cars on Richmond Street will be turning left at the canal, making Charlemont Street a more suitable route for these journeys. This should naturally result in a significant drop in traffic volumes on Richmond Street. If there is excessive traffic, other measures should be considered to push people towards Charlemont Street, such as a left turn ban from Richmond Street onto Canal Road, or simply a bus gate on Richmond Street bridge.

We welcome the decision to reduce the amount of space allocated to motor traffic between Camden Street and Dame Street. However, we still think the proposals could be more ambitious in prioritising the large number of pedestrians who currently squeeze onto narrow footpaths. BusConnects provides a great opportunity to fundamentally redesign these streets with wide footpaths, ample bike parking, outdoor seating, and plenty of greenery.

We believe that all private through traffic should be removed. Even traffic going to/from the car parks in the Grafton Street area could be eliminated by requiring drivers to use roads like Clanbrassil Street/Golden Lane, or Harcourt Street/York Street. This would improve bus priority and create a much more pleasant space for

people walking and cycling. With so much on-street parking on nearby roads, plus several multi-storey car parks within a 10 minute walk there is no obvious need for parking bays on Camden Street. One or two of these could be converted into disabled parking, but the rest should be removed or converted into loading bays.

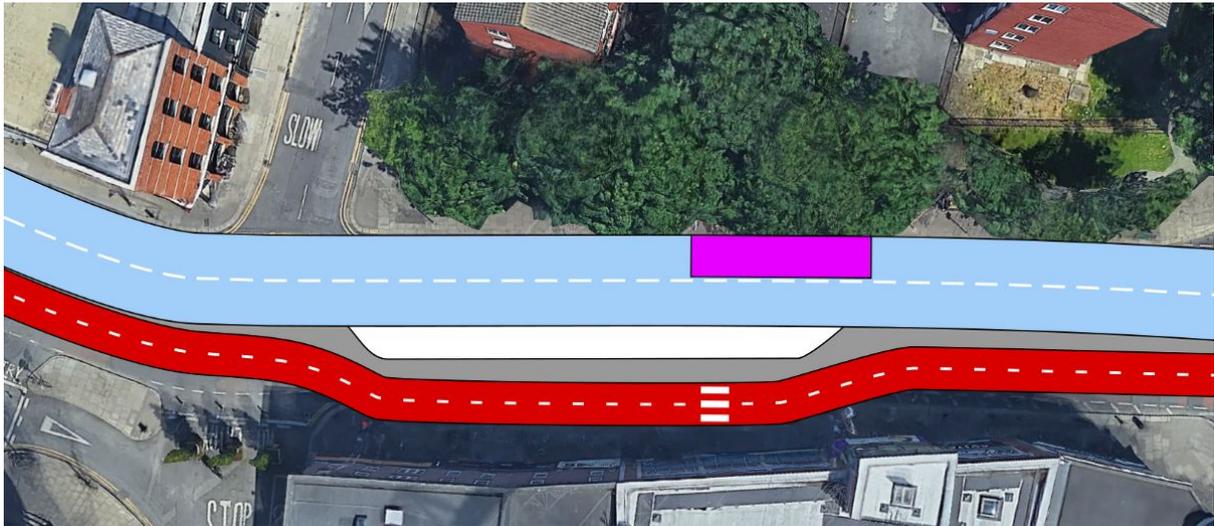
On George's Street and Aungier Street, there are a number of very serious conflicts which will make cycling along this road dangerous and unpleasant. For example, at bus stops, shared spaces are being proposed, which are problematic at the best of times. But on a road with such narrow and crowded footpaths, shared spaces would be extremely dangerous and uncomfortable for pedestrians and cyclists alike.

Another conflict occurs at loading bays, where the proposal is to run the cycle path between the loading bay and moving traffic. There are a number of reasons why this design is unsafe. Firstly, it requires drivers to cross an active, and often busy, cycle lane, which could easily prove fatal if a cyclist gets caught in the driver blind spot. Additionally, improperly parked vehicles will obstruct the cycle path, forcing cyclists back onto the road with buses and vans. It is not uncommon to see partially parked vans blocking bus lanes in this area (especially when loading bays are busy), and there is no reason to expect this behaviour to change if the bus lane is replaced with a cycle path.

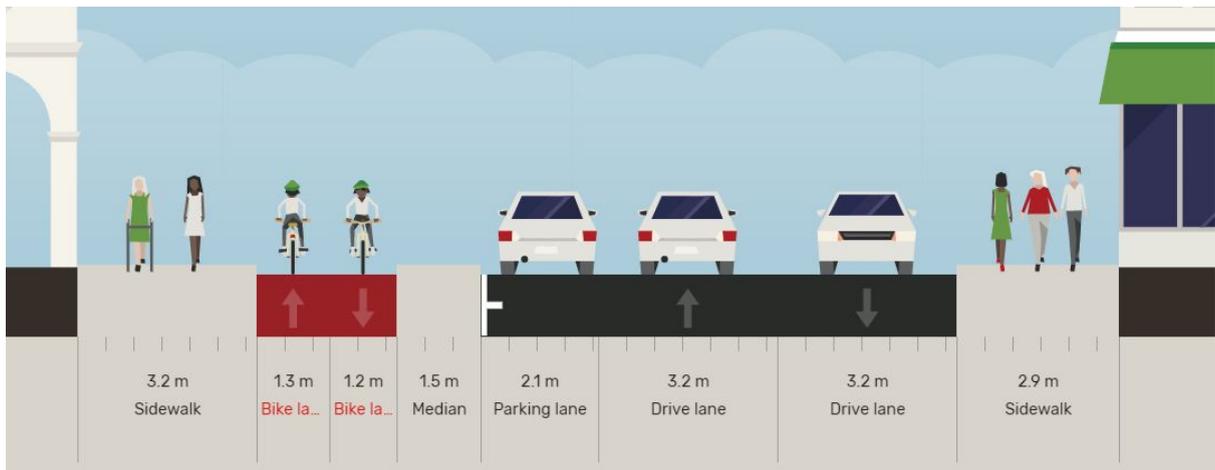
We recognise the space constraints that exist on this road, which is why we propose a bidirectional cycle path on one side of the road, which would run from Dame Street to Camden Street, and perhaps even continue as far as the Grand Canal. Our preference would be for this to be on the eastern side of the road for easy access to the Dame Street plaza, the Grafton Street area, and Stephen's Green. However, without relocating some loading bays, it might only be feasible to install it on the western side of the road, which would also be acceptable.

This design is beneficial for a number of reasons. Firstly, bidirectional cycle paths are inherently more space efficient than one-way paths, requiring only 3-3.5 m (with 2.5 m possible to get through pinch points), while one way paths require 2 m each. Secondly, this design would eliminate the vast majority of conflict points. Of the 8 loading bays on George's Street and Aungier Street, 6 of them are on the eastern side, occupying 72% of loading bay space on this road. By installing a bidirectional cycle path on the western side of the road, it is possible to completely avoid almost every loading bay. The images below show how the two remaining loading bay conflicts could be managed.

The first graphic is outside Tesco, where the road widens to over 20 m. Without any reduction in footpath width or loading bay length, it is easily possible to install a 6.5 m wide carriageway, a 3 m wide bidirectional cycle path, a 2.1 m wide loading bay, and a 1.5 m buffer between the loading bay and cycle path.



Outside Fanagan’s Funeral Directors, space is more constrained, but a high quality design is still possible within the existing carriageway, as shown in the cross section below. As before, should more space be necessary, there is scope for narrowing the traffic lanes or footpaths.



The bus stop conflicts could be managed by rationalising bus stop locations. There are a number of locations where the road widens to 19 or 20 m, which is more than enough for a 2-2.5 m wide bus stop island, and a 3 m wide cycle path. Additionally, some bus stops could likely be removed. For example, the two northbound bus stops on map 18 are about 270 m apart, even though the NTA says that 400 m between bus stops is the desired separation.

One major drawback of bidirectional cycle paths is that they can make signal sequencing at junctions more complicated. However, this becomes much less of an issue if traffic on the road is limited to buses and loading vehicles, as should be the case here.

Continuing the bidirectional cycle path onto Camden Street and reducing the carriageway to 2 lanes would facilitate a huge widening of footpaths, giving the road the feel of an open plaza, with trees, public seating, and a generally pleasant environment.

Provision for people cycling through junctions

General Junction Issues

Throughout this scheme there are 2 issues in relation to the design of signalised junctions that make it difficult for cyclists to negotiate:

- 1 On a number of junctions the option for a safe right hand turn by a cyclist is not easily allowed for. Some of these junctions are referred to below.
- 2 There is no clear indication that signalised junctions will provide an early green for cyclists, to enable them to safely avoid left turning traffic, or to be able to make a right turn safely

The broader issue of cyclists wishing to make right turns off a route on to a side road needs to be considered, and also for pedestrians.

Grange Road Junction (Map 1)

We welcome improvements for cycling with this revised design.

Provision for cyclists at the Grange Road junction has significantly improved with a protected design enhancing safety for cyclists travelling in all directions and the provision of an islanded bus stop. We welcome plans to ensure links with the proposed Grange Road Cycle Route Scheme. There is no link to existing cycle lanes on Nutgrove Avenue indicated. The approach to this junction via Nutgrove Avenue is currently sub-optimal, with the cycle lane ending abruptly and shared pedestrian/cyclist provision risking safety for both groups and providing potential for conflict. We hope that the junction re-configuration will include improving the current layout for cyclists.

Willbrook Road/Grange Road junction (Map 2)

Provision for people cycling has improved with this design. In particular, we welcome parking protected cycle tracks between the Willbrook Road and Butterfield Avenue junction. There is an opportunity here to improve provision for people cycling. There is currently no safe area indicated for cyclists making an outbound right turn at this junction. Our interpretation of the current design is that cyclists should travel to the pedestrian lights at the Rathfarnham Castle side of the junction. If this is correct, there is no facility provided to make this right turn that does not impede cycle lane traffic continuing straight down Grange Road outbound (the 'Typical Cross Section' describes a cycle track width of two metres only). Furthermore, the pavement at this point is often busy due both to the junction and the entrance to Rathfarnham Castle Park. As with the previous point, there is no protected provision for people cycling making a right turn from Willbrook Road to Grange Road.

Butterfield Avenue/Rathfarnham Road junction (Map 2)

This junction has improved since previous versions and we welcome these changes. Reduction to a single westbound motor vehicle lane on Butterfield Avenue is welcome. There remains no provision for cyclists making a right turn outbound from Rathfarnham Road who it appears must wait within cycle lane (as with junction to Willbrook Road) resulting in potential conflict with cyclists travelling straight down toward Grange Road. There is no protection for turning cyclists at the Butterfield Avenue/Rathfarnham Village junction. A protected junction here would benefit active travel to the village and should be implemented. Rathfarnham Village contains numerous retail and dining outlets in addition to a pre-school and an afterschool facility. Segregation of this junction is imperative to encourage sustainable journeys in the locality.

Junction of Rathfarnham Road/Rathfarnham Village/Castleside Drive (Map 3)

The previous design of this junction has been retained. We recommend a protected style junction here (as with Grange Road junction at commencement of route). This will provide safe access both to Rathfarnham Village travelling outbound and from Castleside Drive also. Rathfarnham Village links to the Dodder Greenway and this junction provides an access point for this, in addition to providing a safe option for local sustainable trips by bike. The outbound cycle lane should begin at the junction, not a number of metres away as in the current design. There appears to be space available to provide safe facilities for cycling here, as indicated by hatching in

the roadway image at this junction. If the space contained within the hatching is insufficient the right-turning traffic lane (from Rathfarnham Road to Castleside Drive) should be re-distributed to protect people cycling here.

Junction of Rathfarnham Road/Dodder Park Road (Map 4)

We hope that you will not progress the current plans that route cyclists away from this location. People cycling will realistically continue to travel through this junction either because of concerns about the diversion (personal security) or because they live in one of the hundreds of houses between where the diversion is planned (at St. Mary's Avenue) and this junction. We strongly recommend the incorporation of protected junction design here, especially in light of the proximity to the Dodder Greenway that is currently in construction.

Junction of Rathfarnham Road/Rathdown Park

There is no proposed provision for outbound cyclists to take a safe right turn on to Rathdown Park, the alternative proposed cycle route.

Terenure Crossroads (Map 6)

There is currently no provision for people cycling east or westbound. We hope you will re-consider this and ensure adequate protection for people cycling who may wish to visit Terenure and for whom the alternative route is not feasible. The right turn on to Terenure Road East for cyclists, if they decide to take this option needs to be catered for.

Orwell Road/Rathgar Road Junction (Map 8)

We welcome protected cycling facilities on both Orwell and Rathgar Roads. However, there is very little protection afforded to cyclists at this junction (we note the close proximity of this junction to a number of schools). Adequately linking the protection on Orwell and Rathgar Roads is vitally important, as is providing segregation for cyclists travelling to/from Rathgar Avenue and who will continue to Terenure Road East. Furthermore northbound access from Rathgar Road on to Highfield Road for cycling is problematic.

Junctions of Rathgar Road/Grosvenor Road and Rathmines Road/Rathmines Road Upper

Both these junctions, as designed for cycling are poor in the extreme and remove any 'directness' that is certainly possible within the physical layout of these junctions.

La Touche Bridge (Map 14)

There is frequent potential for conflict here, which is especially risky due to the volume of cyclists who already use this bridge to cross the canal daily- and this will increase both post-COVID and with BusConnects implementation.

Camden Street Upper and Charlotte Way (Map 15)

We are appreciative that segregated cycle paths are provided on Richmond Street South. However, it is disappointing that outbound cyclists are not afforded protection outbound on Camden Street Upper. This is especially concerning as two lanes are provided for motor traffic making a right turn from Camden Street Upper to Charlotte Way. It appears that removal of one of these lanes would facilitate installation of a cycle lane outbound, with opportunities for place-making and urban realm improvements then possible with leftover space.

Cuffe St Junction

The proposal to retain the 3 vehicular lanes westbound on the east side of Cuffe St junction is unwarranted. These eastbound lanes feed into a single lane carriageway west of this junction.

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