



Core Bus Corridor 13: Bray

17th April 2020

1.0 Introduction

Dublin Cycling Campaign is a membership-based 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.

Broadly we welcome the improvements in this CBC from the last round. There have been marked improvements in a number of locations. The goal for this cycle route must be that it is safe for people of all ages and abilities.

We understand that the designs are a work in progress. We have made a separate submission recommending design approaches to be taken across all corridors. This submission includes localised comments.

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.

If the cycle routes do not measure up to international best practices we will not see kids cycling to school with their parents, teenagers cycling to the cinema, commuters cycling to work or older people cycling to the shops.

Only by enabling many people to cycle, by making it a realistic choice, can we deliver the potential modal shift changes. Whenever a new person starts cycling society reaps the benefits of improved public health, reduced congestion, and better liveability for our urban places. The maximum benefits of cycling are only achieved by designing cycle routes that enable the largest cross-section of society to cycle.

2.0 Welcome Changes and General Comments

There are a number of welcome changes along this corridor including:

- Two of the junctions (Newtownpark Avenue and Nutley Lane, Maps 13 & 27) have been redesigned to extremely high standards.
- Many of the bus/cyclist conflicts have been eliminated by proposing island bus/coach stops.
- At the pinch point between Belmont Avenue and Brookvale Drive (Map 9), one lane of motor traffic has been removed to make space for a cycle path.
- A bidirectional cycle path has been proposed to connect the main road to Shankill Library and St Anne's National School (Map 44).
- The idea of widening Shankill village to 4 lanes, and the proposed cyclist diversion has been abandoned (Maps 45-48).

Unfortunately, many of our concerns have not been addressed, and most of the scheme hasn't been changed at all:

1. Other than the two junctions mentioned above, all of the major junctions are still extremely hostile and dangerous for people cycling:
 1. Slip lanes have been retained at many junctions, allowing car drivers to make left turns at high speeds, which is unsafe for people cycling.
 2. Some of the junctions require people to cycle between two motor traffic lanes in order to go straight or right. This is dangerous, and it makes the junction unusable for less experienced cyclists.
 3. At almost every junction, turning right for people cycling (and in some cases, even going straight) is impossible or extremely dangerous.
 4. None of these lower quality junctions have kerbs or buffers to protect cyclists from left turning cars.
2. At minor junctions, there have been no changes proposed to manage conflicts between cyclists and turning cars. With small changes, the safety and comfort of people cycling could be improved at all these junctions:
 1. Raised crossings should be added to slow cars down and make clear to drivers that people cycling have priority.
 2. The cycle path should be set back from the road to ensure that people cycling do not get caught in driver blind zones.
 3. The side road should meet the main road at a right angle to further reduce speeds and increase visibility.
 4. The number of conflict points should be reduced by closing off junctions that are not completely necessary (e.g. Nutley Park, Stillorgan Grove)

3. Many of the bus and coach stops still don't have full bypasses for people cycling. It is possible to upgrade every stop to an island bus stop without removing any of the proposed coach lay-bys.
4. The proposed cycle lane widths are still narrower than the ideal. On a high speed dual carriageway, 2 m without a buffer is not enough to enable people of all ages and abilities to feel safe cycling. Much more suitable would be 2.5 m with a 1 m buffer between the cycle path and the road. This is achievable along much of the corridor.
5. At pinch points, the design still narrows/removes cycle paths and footpaths in order to squeeze in more motor traffic lanes. Where segregated cycle paths cannot be provided (e.g. Shankill Village), there are no traffic calming/reduction measures being proposed. This also applies to Leeson Street, Donnybrook and just before the Fran O'Toole Bridge in Bray.

It is our view that consideration must be given to lane reduction and median-narrowing measures along the N11 from Donnybrook to the Loughlinstown Roundabout. These are the main reasons:

- The carrying capacity of the N11 is built for morning/evening peak and much of the space is unused most of the time. If Bus Connects is a success in creating modal shift towards bus and cycling, then there will be fewer cars using it at peak times.
- The N11 was built/widened between the 1950s and 1970s when there was very little residential development along the corridor. Recent years have seen significant high density residential developments constructed within 100 metres of the N11, with more planned. (RTE site, Blake's, Leisureplex). The residential nature of this corridor now means that there is greater demand for high quality footpaths and cycle tracks for local journeys.
- Increased use of buses along the N11 will mean higher numbers of pedestrians. It is not appropriate for pedestrians to walk on 1.5m of footpath while there are 4-6 lanes of general traffic with a median.
- A shift towards remote working as a result of the coronavirus crisis will reduce peak road demand.

Retaining very long right-hand filter lanes effectively means there are 3 general traffic lanes in one direction at points. For example, the 650m inbound right-turning lane from before the UCD flyover to Nutley Lane. If the NTA are serious about modal shift and giving priority to enhanced pedestrian, cyclist and bus facilities, lanes such as this will be shortened in favour of re-allocating space to other road users.

1. On Leeson Street, between Hatch Street and Stephen's Green, the proposal is to retain the existing 1.2 m wide cycle lanes, rather than

removing a lane of motor traffic to make space for people to cycle in safety and comfort.

3.0 Location Specific Comments

Leeson Street Lower (maps 3-4)

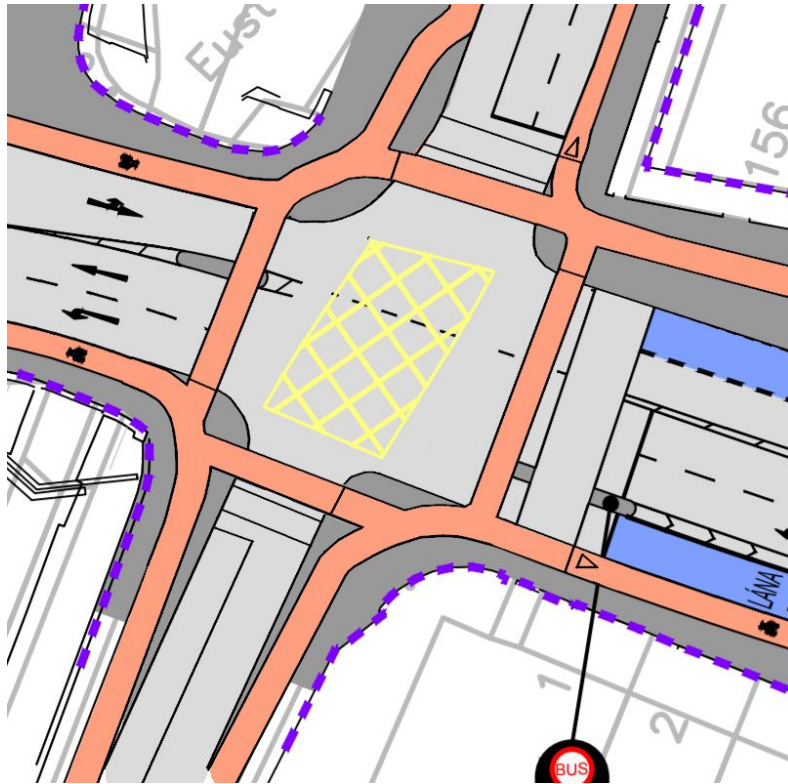
As discussed in our original submission, the stretch of Leeson Street between Hatch Street and Stephen's Green is far too narrow for the proposed layout. At present, the two cycle lanes are unsegregated and extremely narrow. Yet even under these circumstances, there is not enough space for three full lanes for motor traffic. The cycle paths desperately need to be widened and segregated. Therefore, the solution must involve reducing the road to two traffic lanes on approach to this junction. Diversions for private traffic and/or bus priority measures can ensure bus priority.

Reducing the road to two lanes would also create space which could be used to install island bus stops.

Between Hatch Street and Fitzwilliam Place, the proposed 4 lane layout would require busy footpaths to be narrowed and prevent the installation of island bus stops. We would like to see the outbound traffic lane removed, and the space used to install wider footpaths, island bus stops, and a buffer between the cycle path and the road. Drivers coming from the Fitzwilliam or Baggot Street areas could get to Leeson Street Bridge via Fitzwilliam Place instead. Only a small number of drivers parked on roads like Leeson Close or a small part of Pembroke Street Upper would be inconvenienced in any way.

Leeson Street Upper/Sussex Road (maps 4-6)

Without any changes to the layout of the motor traffic lanes, the Grand Parade junction could be radically improved for people cycling as the image below shows.

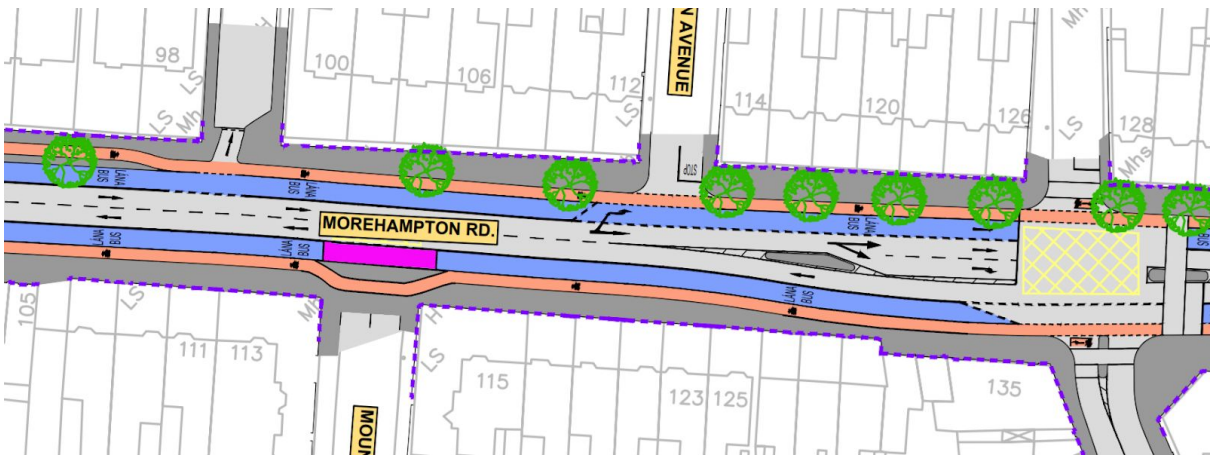


On Sussex Road, the 120 m stretch of unprotected cycle lane sandwiched between moving traffic and parked taxis/coaches is extremely unsafe. The cycle path should be on the other side of the parked vehicles, and the coach stop should be fully bypassed.

Morehampton Road (maps 7-8)

There are a number of bus stops along this stretch that should be relocated to make them safer for people on bikes.

- The first outbound bus stop could be moved to outside the Hampton Hotel where a grass verge could be converted into an island bus stop.
- The outbound Belmont Avenue stop could also be relocated to the entrance to Mount Eden



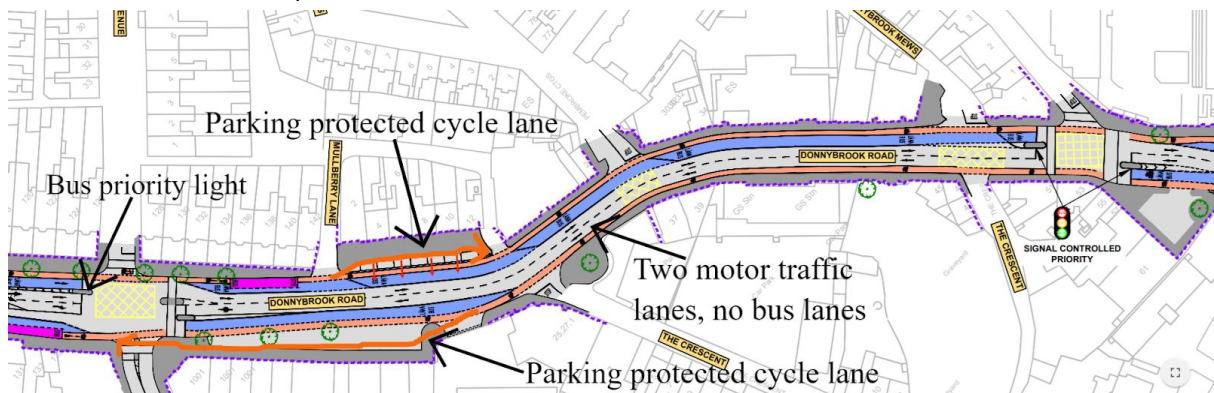
Donnybrook (Map 9)

We welcome the decision to narrow the road between Donnybrook Fire Station and Brookvale Drive to accommodate cycle lanes, but this will not be enough to make the road safe for people cycling. This only makes space for 1.5 m wide cycle lanes in each direction without any space for segregation. Given the high traffic volumes and speeds on this road a cycle lane this narrow would make cycling here extremely uncomfortable and scary.

Even more concerning is that the lack of space will mean that buses and other large vehicles will be likely to encroach on the cycle lanes as they go around the bends in the road. This could make the design lethal for people cycling.

With barely 12 m between the footpaths, the only layout that is safe and comfortable for all road users would be two motor traffic lanes and two 2 m wide cycle paths, with a physical buffer between the cycle paths and the road. This would require an outbound bus priority light to be installed at Belmont Avenue.

Reducing this stretch to two lanes would also make it possible for the cycle path to bypass the parking bays, and for island bus stop to be installed at the outbound Belmont Avenue stop.

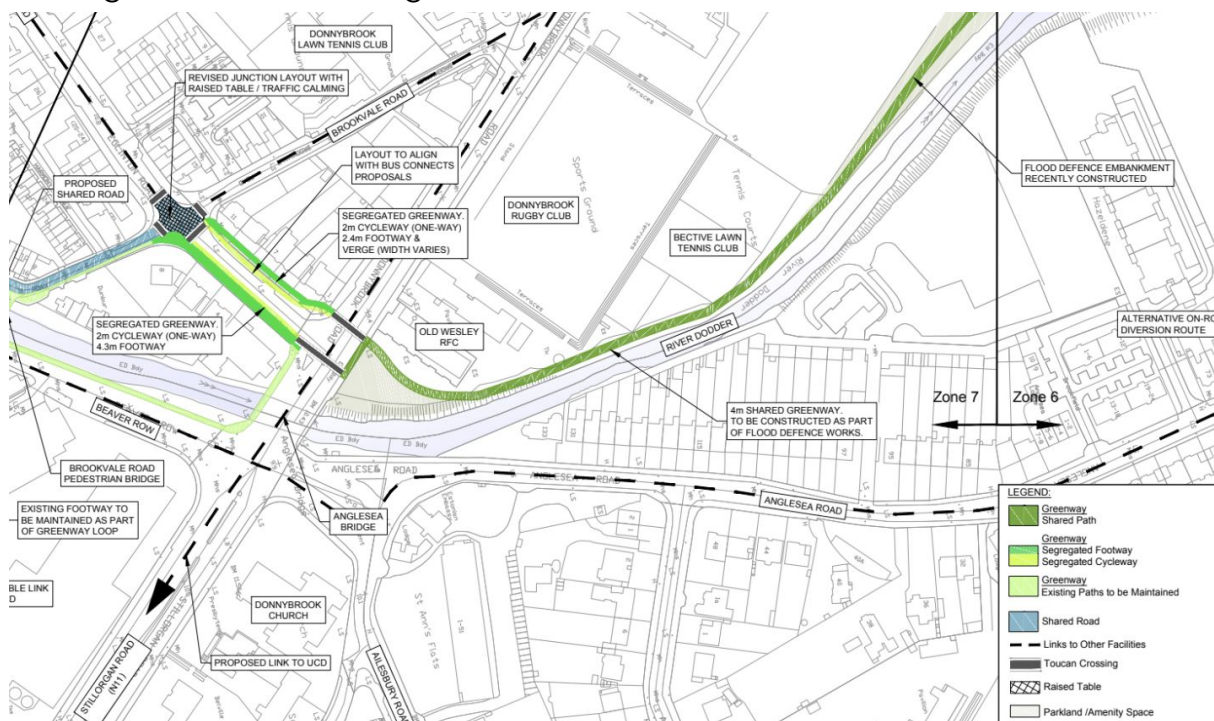


Beaver Row/Anglesea Road Junction (Map 10)

We're very welcoming of the design change to bypass the busy bus stop just north of the Eglinton Road junction. This also makes crossing Eglinton Road much safer for people cycling.

We're disappointed to see the outbound bus stop is not bypassed. If our 2 lane recommendation above is implemented, this bus stop could be moved further north where it could be bypassed.

There is no reference in the designs to the Dodder Greenway which the NTA have recently taken ownership of. The Dodder Greenway preferred route has toucan crossings which CBC13 designs have not included.



The outbound bus stop at Donnybrook Bus Garage must be an island bus stop. It's completely unacceptable to put cyclists and buses in conflict here, particularly as it is at the bottom of a hill. To achieve this space, we recommend realigning the median and reducing the N11 outbound to one lane from Donnybrook Church to at least Airfield Park. Reduced traffic volumes from lane reduction in Donnybrook will mean reduced traffic volumes along this stretch of the N11. A bus stop bypass here is more important than retaining under-utilised car carrying capacity.

UCD Flyover & Interchange (Map 16)

Given the wealth of space available, it is extremely disappointing to see almost no improvements to the design of the UCD flyover.

The extensive use of shared spaces on the southbound side of the flyover is concerning. These are very busy bus stops, so avoiding pedestrian/cyclist conflicts is especially important. With a large grass verge and an access road that is much wider than it needs to be, there is no reason these conflicts can't be avoided.

The design of the bus interchange also creates unnecessary danger for people cycling. There is no need for the cycle path to cross the bus lane to bypass the main bus stops.

The on-street car parking on the slip road to the east of the N11 renders the adjacent cycle lane unsafe. There are two choices:

1. Narrow the road so that a buffer can be added between the parking and the cycle lane.
2. Remove the car parking entirely. It is highly under-utilised and serves no essential residential or retail purpose.

Fosterbrook, Foster's Avenue & The Rise (map 17-18)

The exit from Fosterbrook to the N11 has the 2 way cycle lane turning at a sharp 90 degree angle. This should be straightened to allow for cyclists to safely pass each other in both directions. This was raised in our previous submission but the design has not been changed.

The coach stop on the outbound side here should be bypassed. Currently there will be a conflict between cyclists and waiting/boarding/alighting coach passengers & luggage. Particularly as the cycle lane is 2 way here. This would be possible if the coach stop was placed at a location where there is not a right-hand filter turn taking up space.

Foster's Avenue is large enough to deserve a full Dutch style junction. Streaming lanes and slip roads need to be removed from the Rise and Belfield Park.

The designs do not match Dún Laoghaire-Rathdown County Council's scheme to the new UCD entrance that is due to start construction in 2020. The Council Traffic Department seem to be opposed to Dutch-style junctions and this scheme may install unprotected junctions. We are requesting that the NTA over-ride the unsafe, unprotected junctions despite them being newly installed.

Boooterstown Avenue, Mount Merrion Avenue junctions (Maps 19&20)

These need to be Dutch-style junctions with streaming lanes and slip turns removed.

The cycle lane inbound passes the filtered entrance to Sycamore Crescent (pictured). This is a particularly busy exit for students of nearby schools during morning peak. Pedestrians and cyclists need more space away from that filtered entrance due to a combination of poor visibility, steep decline and crossing the pedestrian crossing waiting area. As it is directly opposite the Mount Merrion Avenue junction, an extra metre of space could be found by realigning the junction and narrowing the carriageway.



Talbot Hotel & Old Dublin Road Junction (Map 21)

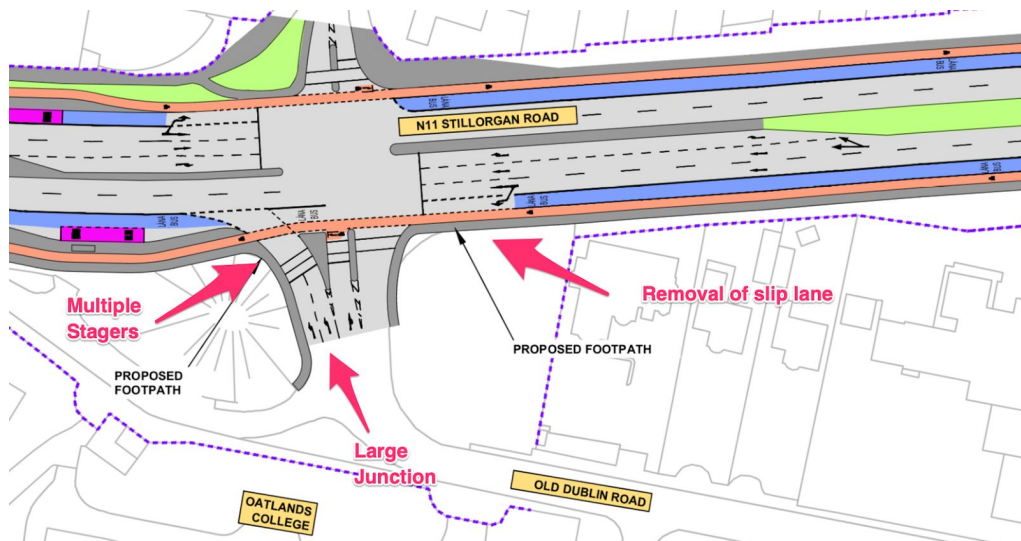
We would like to reiterate that we welcome the improvements to the existing layout that were present in Phase 1: changing the Talbot Hotel access point to Treesdale (we would welcome clarity on this in the next phase of drawings). We also welcome the improved layout of the Old Dublin Road junction.

We would like to reiterate our points from our Phase 1 submission:

We recommend that the Old Dublin Road junction be closed to traffic and all traffic be diverted via Lower Kilmacud Road (map 22). As well as reducing the number of junctions along the main route, it will help to improve traffic flow on the main Stillorgan Road.

However, if this design is persisted with, the junction could be improved further. The junction is still too large. This leaves pedestrians with 3 staggered crossings. It is unclear why left-turning traffic needs two turn lanes.

We would also encourage the design team to investigate the nature of traffic using this junction. Given the proximity of this junction to the Lower Kilmacud Road junction, it might be feasible to close off the Old Dublin road junction and turn the road into a cul de sac.



Extract of map 21

Stillorgan Underpass (Map 22)

We recommend working with Dún Laoghaire Rathdown county council on their planned upgrade of the library facility and public realm around the underpass. It should be made easily accessible by bike from both sides.

Lower Kilmacud Road junction & The Hill (Map 23)

Nothing has changed on this Map since the last phase so our feedback from last phase is still valid.

The junction needs to be upgraded to a Dutch-style junction the same as the Nutley Lane junction.

The junction of The Hill and Stillorgan Road (map 23) should be closed off to motor traffic. The Hill is a local access road. Traffic bound for Stillorgan Village should use Lower Kilmacud Road. Local traffic can also be accommodated using St Brigid's Church Road or Lower Kilmacud Road.

Closure of The Hill slip turn from the Stillorgan Road was recommended on page 66 & 92 of 'Stillorgan Village Area MFP Preliminary Design and Options Report' prepared by Clifton Scannell Emerson Associates as part of the Stillorgan LAP 2018-2024.

The very wide median here could be narrowed in order to provide a better buffer between the cycle tracks and the bus lanes, and between the cycle tracks and footpaths.

Map 24

We are disappointed that the minor entrances on the outbound side are still hostile to people walking and cycling. The most southerly one could be rationalised as access can be maintained to John of God's through Stillorgan Grove. Stillorgan Grove needs treatment as described above. At right angles to the main road and cycle track set back and raised.

Again, with grass areas/verges here, it should be possible to give a buffer between the cycle tracks and the bus lanes.

Brewery Road & Beechwood Court (Map 25)

We're disappointed that no improvements have been made to this section since Phase 1. Brewery Road junction should be Dutch-style just like Nutley Lane. Our feedback from last time also still stands:

Given the large volume of traffic turning left onto Brewery Road, inbound cyclists continuing straight are at high risk of being hit by a left turning vehicle. The grass verge should be used to install a buffer between the cycle track and the carriageway.

Beechwood Court is another example of a minor road which does not need a direct connection to the N11. Requiring traffic to access Beechwood Court via Farmleigh Avenue would reduce the number of conflict points for all traffic on the N11. The grass verge in this location could also be used to install a buffer between the cycle track and the carriageway in line with best practice.

Gallop Green (Map 26)

The entrance to the Gallop Green slip road entrance/egress should have a raised cycle track and footpath to clearly show priority to pedestrians and cyclists at this side road.

Newtownpark Avenue (Map 27)

We strongly welcome the Dutch-style design of this junction.

Kill Lane (Map 29), Old Bray Road Junction (Map 31), Clonkeen Road Junction/Cornelscourt (Map 33), Johnstown Road (Map 35), entrance to Cherrywood SDZ (Map 37)

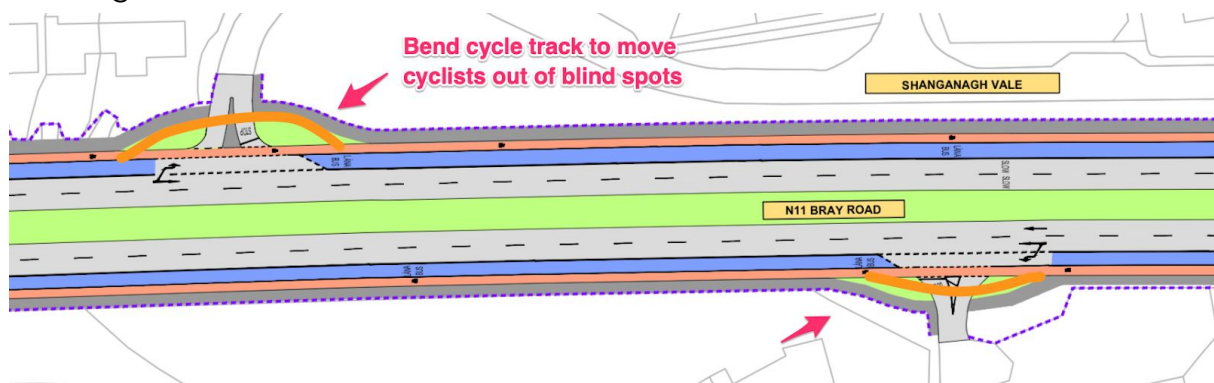
A Dutch-style junction as at Newtownpark Avenue is strongly needed at these junctions. The entrance road to Cherrywood SDZ will need to be redesigned to be consistent with junction treatment throughout the N11. The current junction design does not keep cyclists safe from turning traffic.

This stretch of the N11 has increased speed limits so a buffer between the bus lane and cycle track is of heightened importance here.

The lack of pedestrian footpath from Map 31 to Map 37 will result in pedestrians walking on the cycle track. We recommend adding footpaths on either side of the road.

Shanganagh Vale & Sunnyhill Park (Map 38), Willow Avenue (Map 39)

We recommend that these 3 entrances be designed to be safer for cyclists, in line with our recommendations for Stillorgan Grove and other minor junctions above. See diagram below (this was also shared in our Phase 1 submission).



Extract of map 38 showing alternate cycle track location that provides a buffer space between left-turning traffic and the cycle track

Wyatville Road (Map 40)

As we wrote in our Phase 1 submission: This overall junction configuration is very difficult for cyclists to navigate and it is unclear how inbound cyclists from Shankill are expected to cross from the 2 way route to the east of the N11 over to the inbound western side

Loughlinstown Hospital (Map 41)

It is also unclear how someone on a bike heading south can safely access Loughlinstown Hospital or the residential estates of Rathmichael Manor and White Gables. This requires design clarification and a possible contraflow cycle route

Map 43-44

Despite there being cycle facilities here in Phase 1, there is now no cycling infrastructure proposed for the 600 m between the Loughlinstown Roundabout and Stonebridge Road. This is a very busy road, and it is not acceptable to expect people to cycle in the bus lane here. There is also primary school along this stretch of road. There are a number of options available:

1. Reduce the number of motor traffic lanes using bus priority lights.
2. Reduce the number of lanes by diverting one direction of through traffic via Stonebridge Road.
3. Build a quietway route to St Anne's Church via Seaview Wood and Shanganagh Road, giving less confident cyclists an alternative to the busy bus lane.

We welcome the new 2 way cycle track along Stonebridge Road, which will make it safe to cycle to the primary schools and library.

The 2 way cycle track on the Dublin Road needs some way for people cycling to access Station Road.

Map 45

The 2 way cycle track abruptly stops and it is unclear how people cycling are expected to access it or exit it safely. This junction needs to be made safe for people of all ages and abilities to cycle on it.

Shankill village (Maps 46-48)

Given there are no cycling facilities along this road, there will need to be changes to make it safe for all ages and abilities to use, despite sharing the road with cars, buses and goods vehicles. Shankill village is a destination. People working, living and shopping there need to be able to access the village by cycling. Some concerns:

- It is currently a 50kph road. It should be clearly marked as a 30kph road.
- There are no traffic calming measures in place or marked in the designs.
- The presence of on-street parking make "dooring" a real danger for people cycling in Shankill.
- The straight nature of the road naturally gives it a "race-track" feel, encouraging speeds in excess of even the current 50kph limit.

Traffic volume reduction measures should also be considered, as well as traffic calming.

The cycle lane ends at Crinken Lane and semi-merges with the bus lane - this is not in any way safe and needs to be changed. The coach stop needs to be bypassed.

Shanganagh Park (Maps 48-49)

We welcome the clarity of the designs where the southbound cycle track intersects with Shanganagh Park. The designs are much improved.

Northbound, the bus stop on Map 49 needs to be island bus stops.

Map 50

We welcome the addition of a grass verge between the cycle track and the bus lane. We would like to see more of this throughout the designs.

M11 Merge (Map 51)

The M11 merge is much improved and is now much safer and more direct for people cycling.

Old Connaught Avenue junction (Map 52)

We would like to see a Dutch-style junction here. This could be achieved by removing one of the turning lanes for private cars. Additionally, the size and layout of the junction is not pedestrian friendly.

It's positive that the southbound bus stop has been moved and changed. Space should be found to install a similar bus stop northbound.

Clear priority for people cycling should be given at St Peter's road by having a raised cycle track and footpath.

Ravenswell Primary School (Map 53)

The cycle track at the entrance to Ravenswell Primary School does not seem sufficiently protected from turning vehicles. The track should be raised and protected by physical segregation given the parking issues close to schools. The current layout of the junction is very hostile to people cycling with the wide sweeping turning arc as well as multiple overly wide lanes. The new layout needs to ensure a tight angle from the Dublin Road.

Map 55

Just before the Fran O'Toole Bridge in Bray, the southbound cycle path disappears for about 50 m. Given that there are three traffic lanes on the bridge, it would make sense to extend the 3 lane layout through the pinch point too.

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