



Dublin Cycling Campaign

% Tailor's Hall

Back Lane

Dublin 8

D08 X2A3

30 August 2022

Blanchardstown to City Centre Core Bus Corridor (Case: 313892)

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.

We have been engaging with the applicant, 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 are broadly supportive of this project from Navan Road Parkway to Ellis Quay, though do request a few minor modifications via condition.

We object to the outer sections of this project (general arrangement drawings 1-14) for delivering unsustainable transport infrastructure for a key district centre, road widening, poor quality pedestrian and cycle infrastructure in violation of DMURS, Traffic Management Guidelines, the National Cycle Manual and the National Sustainable Mobility Policy. We request that these sections be reconsidered by the applicant or that these elements are omitted by condition.

We request an Oral Hearing to discuss the issues.

2.0 Achieving National Mobility Policy Targets

The goals of the National Sustainable Mobility policy are a 51% drop in transport emissions, and 500,000 additional daily active travel and public transport journeys. This will require a significant modal shift.

This modal shift will only happen with two elements:

- There is a suitable environment for people of all ages and abilities to cycle
- There is comparative advantage for active travel / public transport modes over private car traffic

The typography 'Four Types of Cyclist' by Dr Jennifer Dill, Professor Urban Studies & Planning, is useful for determining what level of suitable cycling environment is necessary to enable people to cycle. 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 people who currently cycle in Dublin are in this cohort or in the 'Strong and Fearless' cohort.
- **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

The outer sections of this proposal will fall well below the standards and quality of service required. It will not 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.

3.0 Universal Design

Dublin Cycling Campaign makes the present submission subject to Universal Design, and urges the NTA to ensure all works are compliant with Universal Design principles to ensure access for disabled cycling and 'non-standard' or adapted cycles, as well as access for disabled pedestrians and passengers (walking and wheeling).

As defined by the National Disability Authority (NDA) and the Centre for Excellence in Universal Design (CEUD), the seven principles of Universal Design are:

1. Equitable Use
2. Flexibility in Use
3. Simple and Intuitive Use
4. Perceptible Information
5. Tolerance for Error
6. Low Physical Effort
7. Size and Space for Approach and Use

(See: <https://www.universaldesign.ie/what-is-universal-design/the-7-principles/>)

4.0 Welcome Design Interventions

We are supportive of a number of elements of the proposed scheme including:

- Bus Gate at Old Cabra Road (R805). The introduction of this bus gate will support the proposal to limit through traffic, which frees up road space for walking, cycling, public transport and public realm.
- Continuous cycle lanes from Old Navan Rd inwards to City Centre. The potential of people to cycle with safety and continuity on a major commuter desire-route is welcomed.
- Turning bans and one-way junctions are welcomed on side roads (such as Blackhorse Avenue (R806), Swilly Road, Annamoe Road, Charleville Road, Monck Place) to reduce rat running, thus making those local neighbourhoods safer for locals, people cycling, and pedestrians.
- The proposed Stoneybatter and Queen Street interventions will bring very positive improvements for the overall neighbourhood, and very clearly provide distinct and legible routes for both buses and people cycling.

5.0 Lack of People-Focused Design in Blanchardstown Centre

We object to the proposals in General Arrangement Drawings Sheets 1-7, which show Blanchardstown Town Centre. Blanchardstown area is home to approximately 108,000 people as of the 2016 Census. Blanchardstown is designated as a Level 2 "Major Town Centre" in the Retail Strategy for the Greater Dublin Area. The applicant's proposals will significantly shape the public realm and desirability of transport options at the heart of this key district centre.

The proposed roads on drawings 1-7 around the town centre include:

- Multi lane roads that prioritise private car traffic.
- Slip lanes and large junctions that are difficult to navigate by people walking or cycling.
- Poor quality walking and cycling infrastructure with low quality of service.

In summary, the roads around Blanchardstown Town Centre are car dominated now. The applicant's proposals are heavy engineering interventions. They place far too much emphasis on 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 Blanchardstown prioritises motor traffic capacity over creating people focused places in violation of local, regional and national policy.

5.1 Policy Review

Both local and national policy place a heavy emphasis on creating sustainable, healthy and people focused town centres. We'll outline some of the relevant policies below.

5.1.1 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."

5.1.2 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."

5.1.3 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"

5.1.4 Town Centres First

Page 9 of The Town Centre First policy recognises that successful places: "

- *Are characterised by an attractive public realm (streets, spaces and parks) that is designed to invite people to meet, mingle and dwell;*
- *Are well connected and accessible to sustainable modes of transport, enabling a high proportion of journeys to be made by foot and/or bicycle from the immediate hinterland (e.g. the '10 minute town' concept);*
- *Manage traffic within central areas so that streets prioritise vulnerable users (people walking and cycling), enabling them to move about safely and in comfort.*

5.1.5 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"*. Blanchardstown Town Centre 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.

5.1.6 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.

5.1.7 Draft Fingal Development Plan (2023-2029)

The Draft Fingal Development Plan zones the Blanchardstown area as MC - Major Town Centre. The strategic objectives of the Draft Plan relevant here include: "

- *1. Transition to an environmentally sustainable carbon neutral economy.*
- *7. Ensure the highest quality of public realm and urban design principles are applied to all new developments, ensuring developments contribute to a positive sense of place and local distinctiveness of an area and facilitate the universal design approach into all developments.*
- *8. Reduce car dependency and promote and facilitate sustainable modes of transport. Prioritise walking, cycling and public transport, while supporting an efficient and effective transport system.*

The NTA should ensure that this BusConnects scheme is consistent and coherent with this Draft Plan.

5.2 EIAR Analysis

5.2.1 Traffic & Transport Junction Analysis

Section 6.1 of Chapter 6 of the EIAR describes scheme objectives and the iterative process the design team undertook in order to produce the design submitted in the application. This included transport impact assessments (TIA) on the proposed junction designs. The methodology of the TIA for junction design is outlined in the document, "*TIA Sub Appendix 2- Junction Design Report*". It shows the focus on reducing average delay per passenger car unit (PCU) and the junction capacity for motor vehicles. There was no consideration given to crossing times for pedestrians,

or additional lanes added to address motor vehicle congestion making junctions larger and more difficult to deal with for people walking and cycling.

The same TIA methodology was used on all junctions of the proposed scheme regardless of the context for the area. This conflicts with DMURS and Traffic Management Guideline policies, which state that in different contexts we should balance the competing needs of motor vehicle junction capacity against the needs of people walking or cycling, and good place making. The needs of a junction in Blanchardstown Town Centre are very different to the needs of a junction on the N3.

For example, "*TIA Sub Appendix 2 - Junction Design Report*" shows the design evolution of the Blanchardstown Road South / Blakestown Way junction (general arrangement drawing sheet 4). The July 2021 iteration re-adds a left-turn slip for general traffic in order to improve junction capacity for motor traffic (as shown in Figure 1 below).

Proposed vehicle slip lanes, where vehicles can cut across people cycling, sometimes at relatively high speeds, are proposed once again, particularly in the Blanchardstown area. None of the junctions around Blanchardstown reflect any of the four junction types developed in the '*Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors (PDGB) (NTA 2021)*' in Appendix A4.1. This issue of inappropriate slip lanes has been raised through the various iterations of this scheme, and yet remains to be comprehensively addressed.

Note the conflicting rationale stating the addition of a vehicular slip lane brings the junction into line with BusConnects PDGB principles. As stated previously, none of the junction types outlined in PDGB recommend slip lanes.

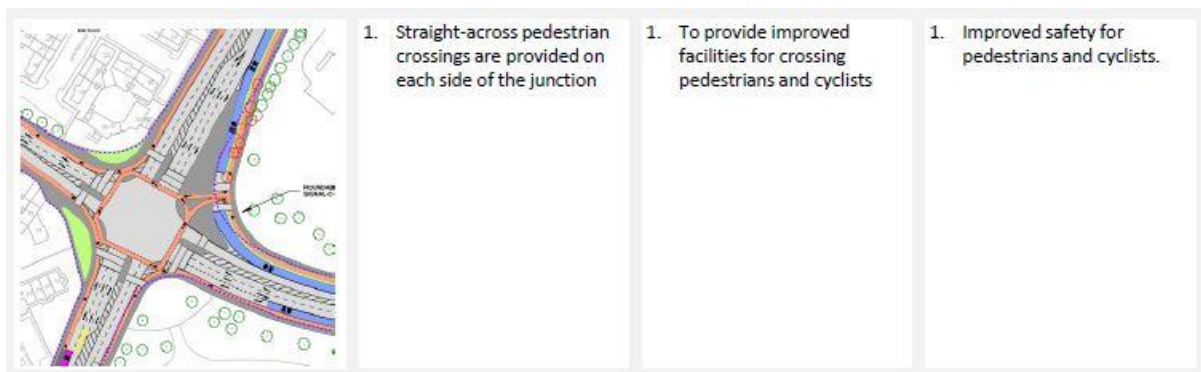


Figure 1 Blakestown Rd Junction showing no car slip lane in final public consultation round.



	<ol style="list-style-type: none"> 1. Left-turn slip modified to allow general traffic alongside bus lane 	<ol style="list-style-type: none"> 1. Allows left-turn traffic bypass the signal junction 	<ol style="list-style-type: none"> 1. Improve overall junction capacity
	<ol style="list-style-type: none"> 1. Left-turn slip modified. 2. Removal of second pedestrian crossing on left turn and improvements to shared space. 3. Switch of pedestrian crossings on eastern arm 	<ol style="list-style-type: none"> 1. To reduce land take. 2. Brings junction in line with BusConnects Preliminary Design Guidance Booklet principles 3. To allow for staggered crossing for pedestrians at the junction 	<ol style="list-style-type: none"> 1. Minimal impact on junction operation 2. Improved pedestrian safety and connectivity 3. Improved pedestrian safety and connectivity

Figure 2 Excerpt from Appendix A6.3 Junction Design Report showing Blakestown Rd Junction final design with additional slip lane

DMURS 4.4.3 states that designers “*should omit left-turn slips as they encourage high traffic speeds and are highly disruptive for people walking and cycling*”. As per the present [National Cycle Manual](#) Section 7.8, the vehicle slip lanes should be removed, particularly at this location in the context of a major town centre.

For similar reasons to the junction example above many of the roads in the Blanchardstown Town Centre are designed to maintain high levels of general traffic capacity. As a result the designs include wide multi-lane roads, with large junctions, slip-lanes, and staggered pedestrian crossings despite this being a key urban centre that should prioritise a sense of place and the ease of people walking and cycling.

5.2.2 Pedestrian Infrastructure

Chapter 6, section 4.6.1 of the EIAR examines the potential impacts for the proposals on pedestrian infrastructure in ‘Section 1’, which is the area around the

Blanchardstown Town Centre. The EIAR uses a number of criteria to indicate that during the operational phase the impacts will be positive, very significant, and long-term effect. While we do not argue that the proposals are not an improvement over the existing infrastructure, they are not high-quality pedestrian infrastructure the assessment might suggest.

The four criteria used include pedestrian directness, vehicular speeds, accessibility and footpath widths. "*TIA Sub Appendix 4 - Impact Assessments*" breaks down the details of each section.

The TIA states that footpath widths of 2m provides a level of service of A around the Blanchardstown Town Centre. In DMURS section 4.3.1 it states that the minimum width is 1.8m and that "*In densely populated areas and along busier streets, additional width must be provided to allow people to pass each other in larger groups*", including up to "*4m in areas of high pedestrian activity*" such as town centres. For example, cross section C-C on Blanchardstown Road South has only 2m wide footpaths on both sides of the road.

The criteria used to assess the pedestrian infrastructure does not include a number of important factors including: pedestrian crossing distances, pedestrian waiting times, or the use of shared space with people cycling.

The applicant has likely not assessed any of these elements as it would show a poor experience for people walking.

5.2.3 Cycling Infrastructure Assessment

Similarly, Chapter 6 section 4.6.2 of the EIAR examines the potential impacts for the proposals on cycling infrastructure in 'Section 1', which is the area around the Blanchardstown Town Centre. The contents of Table 6.27 of the EIAR demonstrate that the proposed scheme will have a positive, significant and long-term effect on the cycling environment along Section 1.

We don't argue that the proposed cycling infrastructure is somewhat of an improvement over the current lack of infrastructure but the proposals are not high-quality.

The applicant has selected three criteria to analyse the proposed cycling infrastructure: segregation, width, and junction treatment. Section 7.3 of the National Cycle Manual includes a Quality of Service calculator, which includes number of conflicts per 100m, journey time delay and HGV influence.

The segregation rating provided in almost all roads in Section 1 is given a score of A as off-road cycle tracks are provided. However, there are a large number of shared spaces with pedestrians. The NCM clearly states (section 1.9) that *“shared facilities should be avoided in urban areas as far as possible as they reduce the level of service to both people walking and cycling”*.

Shared spaces are also generally rejected by many disabled people, including blind or visually impaired people who don't want to share space with people cycling.

The heavy use of shared space is unnecessary and could be avoided through different designs.

5.3 Conclusion on Blanchardstown Town Centre Proposals

Local and national policy is clear that we should be designing our town centres to focus on creating high-quality people focused places. The proposals from the applicant do not provide that. Instead it provides an environment that encourages high car use to the detriment of people walking and cycling.

The proposals do not comply with local and national policy and should be significantly altered or omitted from any approved scheme.

6.0 Shortcomings & Consistency of Approach

6.1 Adherence to the National Cycle Manual (NCM) & Design Manual for Urban Roads and Streets (DMURS) Design Standards

It is critical in a scheme of this nature that the highest standards are applied in line with national standards and guidance. We are concerned, particularly in the areas around the Blanchardstown complex where speed limits of 60kph apply on some roads, that protection of vulnerable road users has not been fully taken into account.

We are already aware from [RSA Free Speed Surveys](#) that over 50% of drivers in urban areas regularly exceed the speed limits. Provision of an adequate buffer zone between people cycling and mainline traffic, in line with the present NCM [width calculator](#) (Section 1.5.2) is essential and appears to have been ignored in certain areas of the proposed scheme. No clear narrative has been supplied to explain these omissions, or to suggest remedial action. As a result people cycling will be put at risk in these areas of omission.

A further area related directly to NCM standards is the use of shared facilities between people walking and cycling. The [NCM clearly states](#) (Section 1.9) that *"shared facilities should be avoided in urban areas as far as possible."*

In this scheme's proposed designs, at most of the junctions in the Blanchardstown area, and on the N3 north of the Halfway House junction, shared facilities are proposed when separate facilities are certainly possible. These junction designs need to be revisited

6.2 Road Widening Counter to National Mobility Policy

The proposed scheme adds an additional traffic lane in both directions to the N3 route outside of the M50. This will add extra private vehicle capacity to the N3. However, the stated project objectives do not include providing increased private vehicle capacity. In Chapter 6 of the EIAR, the applicant shows a 14% drop in people travelling by private car in the opening year 2028. In Diagram 6.24 the flow map shows that in the AM peak on opening year (2028) that the combined flow difference on the N3 will be reduced by over a thousand vehicles.

The National Sustainable Mobility Policy has objectives to reduce fossil fuel vehicle kilometres by 10%, increase active travel and public transport journeys, and reduce transport emissions by 51% by 2030.

The proposal to increase private car capacity on the N3 through road widening when applicant shows there will be less traffic after the scheme opens, flies against the three core objectives of the National Sustainable Mobility Policy.

It isn't clear from the Transport Impact Assessment that the road widening is necessary. As a result the negative environmental impacts of the road widening are not justified.

6.3 Bus Interchange/Layover at Blanchardstown

We welcome the idea and broad design of the proposed Bus Layover in terms of bus access and movement. However, this design alienates bicycle users, and requires a radical rethink in terms of general traffic movement and prioritisation of cycling and walking.

The proposed two-way cycle route has been laid out and truncated so that, for example, people cycling are obliged at one location to make their way across an unacceptable shared facility and two road crossings. General motor traffic is given a dedicated slip lane and unexplainable access road from west to east. It is more logical to continue the two-way cycle lane along this proposed section, and relocate

all vehicular traffic (other than buses), to the south of the proposed new Bus Layover. This comment is a particular instance of the general poor and unacceptable design standards for cycling, as part of this overall Blanchardstown area, and as referenced in Section 5 above.

6.4 Main Drawings Legibility

The General Arrangement Drawings and the associated Typical Cross Sections should provide all of the required information to enable accurate assessment of the scheme details. This is not the case, for three main reasons:

- (i) The general arrangement (GA) drawings do not clearly indicate, except in some specific instances, whether particular junctions, or crossing, are signalised. This is a major shortcoming, especially in enabling the assessment of cycling and pedestrian safety at junctions.
- (ii) In a number of locations throughout the GA drawings there is deficient labelling of street and road names, making it more difficult for the observer to locate and assess each area.
- (iii) The number of 'typical cross sections' supplied in the documentation, to complement the general arrangement drawings is inadequate, and does not enable a true and comprehensive assessment of the full scheme.

The technical nature and the volume of documents, of themselves, present a potential barrier to lay persons seeking to access information relating to this scheme, and participate in the planning and related processes concerning these changes to the environment. Thus, there are arguably shortcomings in compliance with domestic, EU and international law on access to environmental information (e.g. the Aarhus Convention and EU Directive 2003/4/EC of 28 January 2003). All schemes of this nature of major importance need to be accompanied by clear and unambiguous visualisations of the proposals.

6.5 Methodology

We have serious reservations regarding the methodology employed to assess the cycling infrastructure in this project. An assessment matrix in Appendix A6.4 Impact Assessments (Figure 3 below) 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.

Appendix A6.4.2: Cycling Infrastructure Assessment

Table 10: Cycling Assessment LoS

LoS	Segregation	No. of adjacent cyclists/width		Junction treatment
A+	High degree of separation. Minimal delay	2+1	2.5m	Cyclists get green signal priority at signalised junctions / has priority across uncontrolled junctions
A	Well separated at mid-link with some conflict at intersections	1+1	2.0m	Toucan crossings at signalised junctions for cyclists along CBC / Protected junctions not already classified as A+ for junction treatment
B	On-road cycle lanes or carriageway designated as 'quiet cycle routes'	1+1	1.75m	Cyclists share green time with general traffic and cycle lanes continue through the junction, for junctions not already classified as A or A+ for junction treatment
C	Bicycle share traffic or bus lanes	1+0	1.25m	Cyclists share green time with general traffic with cycle facilities (advanced stacking locations / cycle lanes) available up to the junction but don't continue through
D	No specific bicycle facilities	1+0	0.75m	No specific bicycle facilities

Table 11: Description of Impact for Cycling Qualitative Assessment

Magnitude of Impact	Change in LoS Rating
High	3 to 4
Medium	2
Low	1
Negligible	0

Table 12: Significance of Effect Matrix

		Sensitivity of Existing Environment			
		High	Medium	Low	Negligible
Description Impact	High	Profound	Very Significant	Moderate	Slight
	Medium	Very Significant	Significant	Moderate	Not Significant
	Low	Moderate	Moderate	Slight	Not Significant
	Negligible	Not Significant	Not Significant	Not Significant	Imperceptible

Figure 3 Showing Cycling Infrastructure Assessment Appendix A6.4.2

According to this assessment matrix (Figure 3), perversely, sharing traffic or bus lanes will always result in an A+ LoS for width. The junctions in the following chainage C0-C200, C200-B800, B800-B100 all have slip lanes directly contravening the NCM, DMURS and their own PDGB (as outlined previously) yet this is not captured in the cycling infrastructure assessment.

6.5.1 Cycling Infrastructure Assessment - Appendix A6.4, Section 1.6, Table 13 Inconsistencies

- N3 slip road to R121 Blanchardstown Road North / South incorrectly states that "Bicycle share traffic or bus lanes" has a LoS of B. this should be a LoS C. "Number of Adjacent Cyclists / Width" here is given a "A+" rating.
- The Slip Way (Chainage C100) onto the N3 from Waterville Rd is not assessed as a junction. People who are cycling are forced to cross a slip lane then almost immediately cross a further traffic lane.
- Blanchardstown Road South / Blakestown Way (Chainage B100/E100) uses the highest rating from a LoS range for junction treatment (not the worst case as is standard industry practice).
- Blakestown Way junction to Crowne Plaza Hotel incorrectly states there is a "continuous cycle track" when there is substantial shared space interrupting the cycle track in several places, particularly at the Bus Interchange as discussed previously. The "Continuous Cycle Track" appears to be from the first round of design.

6.5.2 Transport Modelling Methodology Appendix A6.2 Inadequacies

It should also be noted that vehicular measurements are quantitative. Neither the Eastern Regional Model (ERM) nor Local Area Modelling (LAM) account for people cycling or walking. Just one out of the three models employed to inform the project actively accounts for people cycling, the Micro-simulation Model. This models only concerns the *"modelling of the Proposed Scheme using the micro-simulation model has shown the differences in travel time for buses as well as general traffic along the full length of the Proposed Scheme, including delay at individual locations."*

6.6 Castleknock Manor

We support the concept of routing the cycle route away from the Navan Road onto Castleknock Manor (GA drawing 15-16). This street is further from the heavy traffic noise on the Navan Road and has the potential to provide a high level of service.

However, we have significant concerns about how it is being proposed. Mixing people cycling and general traffic should only be done in low traffic and low speed areas.

The current design of Castleknock Manor is not the kind of slow self-regulating street DMURS and the National Cycle Manual require for integrated cycling. The street is wide, straight and includes large corner radii, all of the design elements

that encourage fast motor vehicle speeds. The only proposed intervention is painting bicycle logos on the road.

DMURS section 4.4.1 recommends narrow carriageway widths to remove speed. The 'Narrow Shared Street' design option in the National Cycle Manual (page 54) states that the max width should be less than 5.5m. Cross section N-N shows this street to be 7.3m wide, far above the recommended in either DMURS or NCM.

More consideration needs to be given to the design of Castleknock Manor in order to ensure a slow speed self-regulating street (an example of which is shown in Figure 4 below).



Figure 4 Example of optical narrowing of a road. The different colour bricks encourage everyone into the middle of the road, which tends to slow all traffic down.

6.7 Ashtown Roundabout Proposals Don't Link to DART+ West Proposals

The applicant is also the designer behind the DART+ West scheme (ABP case: 314232) also before the board. This application includes changes to Ashtown Road to provide a two-way cycle track under the railway and canal ([source](#)).

The proposed one-way cycle tracks included in this application for the Ashtown Roundabout do not link up with the proposals from the DART+ West application. This will create a disjointed set of cycle lanes instead of a connected cycle network. Leaving gaps in cycle lanes discourages many from cycling. We request a condition to alter the cycle tracks on the Ashtown Roundabout to link to the proposed

two-way cycle track in the DART+ West application in order to provide a consistent and coherent cycle network in this area.

6.8 Missing Cycling Connections in Cabra

Coherence is one of the 5 'Needs of Cyclists' as outlined in the National Cycle Manual (National Cycling Manual 4.4.1.2 Principles of Sustainable Safety). For example, Cabra Road (R147) does not have a westbound cycle lane nor does Ratoath Road have any cycle lane integration for future schemes. Furthermore, the junction of Old Cabra Rd (R805) and North Circular Rd (R101) does not have an integration for the future route on the North Circular Rd.

Ratoath Road (R805), Cabra Road (R147) and NCR (R101) are Secondary Routes as per the Greater Dublin Area Cycle Network. These cycle lanes should be included as outlined in Chapter 04 of the application "Proposed Scheme Description" Section 4.6.6 Integration "Greater Dublin Area Cycle Network Plan (GDACNP) (NTA 2013)."

7.0 Conclusion

In conclusion, Dublin Cycling Campaign:

- Objects to the elements around Blanchardstown Town Centre as low-quality active travel infrastructure and public realm that doesn't comply with local and national policy for designing people-focused town centres
- Requests alterations to some elements of the design to reduce speeds, remove shared pedestrian and cycling spaces, improve junction designs
- Supports all of the proposed interventions from Navan Road to the Liffey Quays as they will significantly improve walking, cycling, public transport and the liveability for these communities
- Requests an oral hearing on this application

Ellen Cullen
Chairperson
Dublin Cycling Campaign

Joan O'Connell
Vice-Chair
Dublin Cycling Campaign