



Dublin Cycling Campaign,
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Back Lane,
Dublin 8

Clonsilla SHD - 309622

<http://www.clonsillashd.ie/>

<http://www.pleanala.ie/casenum/309622.htm>

11th April 2021

INTRODUCTION

We are writing to you on behalf of the Fingal Cycling Campaign a subgroup of the Dublin Cycling Campaign which has been advocating for improved cycling infrastructure for Dublin for 28 years and a registered charity #20102029. Dublin Cycling Campaign is a member of Cyclist.ie (www.cyclist.ie), the Irish Cycling Advocacy Network, is the network in Ireland of Cycle Campaign, Bike Festival, and Greenway Groups, and is the Irish member of the European Cyclists' Federation (www.ecf.com). Our aim is to make Fingal a safe and friendly place for everyone, of all ages, to cycle and walk. Dublin and Fingal Cycling Campaign welcomes the opportunity to comment on Osh Ventures Limited Designs for the Old Schoolhouse development in Clonsilla.

GENERAL COMMENTS

Fingal Cycling Campaign welcomes the opportunity to comment on these designs. There are some nice cycling and walking features within the development but are undermined by the proposed road layout and barriers on the cycle paths at either end of the proposed shared cycling and walking facilities along the northern edge of the development. The overall design plan does not meet the objectives of the Kellystown area plan and the proposed Royal Canal Greenway route. The entrance to the development along the Porterstown road is a hazard for the large volume of primary and post-primary school children walking to Scoil Choilm. There are particular concerns relating to the planned road junction designs.

SPECIFIC COMMENTS

BICYCLE PARKING

- We recognise the Osh Ventures Limited have provided the number of bike parking spaces as specified in the Fingal County Development plan cycling parking recommendations and the Sustainable Urban Housing: Design

Standards for New Apartments 2018. The bike storage facilities shown in **Image 1**, taken from document **PE18105-CWO-01-ZZ-DR-A-006002- Bicycle Storage Compound**, states all 80 bike parking spaces are located beside block A. It is unclear if these are visitor bike parking facilities or residential. If it is visitor parking in one location for a site that spans over approx 2 km long development would not be considered to be efficient or a network of parking facilities, direct or convenient as stated in Fingal development plan, See APPENDIX I.

- It's not clear from the site parking plans referenced in the following document **PE18105-CWO-ZZ-ZZ-DR-A-002008 Site Plan parking** of what type of bicycle stands are being designed for the spaces within the undercroft part of the development that would be used by residents. Bike parking here without proper security -like cages- makes locking bicycles very difficult and prone to theft which is a serious problem in Dublin. These plans contradict the National Cycle manual, Fingal development plan and Sustainable Urban Housing: Design Standards for New Apartments 2018 recommendations for safe and secure bicycle parking within developments. It's very difficult to comment on plans when they are not provided in detail or to see if they match the required specifications.
- It's not clear from designs if the two tiered bike racks are gas assisted? This makes these bike racks only suitable for certain types of bicycle. They won't be compatible for larger heavier Dutch style bicycles, kids bikes or non standard bicycles such as Cargo bikes. Fingal CoCo recently put in place plans for Cargo bike parking in the Kellystown development directly across the canal from this development. Kellystown is planned to be a cycling and walking friendly development.
<https://www.dublincycling.com/cycling/cargo-bike-facilities-designed-new-kellystown-development-plan>
- Osh Ventures Limited are not in compliance with the Sustainable Urban Housing: Design Standards for New Apartments 2018. On page 25 of the Sustainable Urban Housing: Design Standards for New Apartments 2018 shown below in italics, it refers to planning authorities to ensure that the details of and access to cycle storage facilities at planning application stage. It's unclear from the design standards in the application what the specific details are throughout the whole development. It also references Dublin Cycling Campaigns bicycle parking guidance document which recommends Sheffield stands. .
 - *Planning authorities should ensure that development proposals incorporate details on the provision of and access to cycle storage facilities at the planning application stage by the development proposer. Appropriate conditions in relation to the operation and maintenance of the cycle storage facilities should be attached to any grant of permission for apartment developments. Further information in*

relation to the design and provision of cycle storage for apartment developments can be found in the National Cycle Manual (National Transport Authority, 2011) and Bike Parking Infrastructure Guidance (Dublin Cycling Campaign, 2017).

- Fingal County Council recommended bicycle parking stands as per their development plan called a “*Sheffield stand*”. Fingal Cycling Campaign recognises the space efficiency of the tiered parking facilities provided by Osh Ventures Limited. Although we also would recommend the use of Sheffield stands. Sheffield stands should be used or at least a mix of these types of stands be provided for both visitors and residents. Sheffield stands are a tried and tested bicycle parking and would be considered to be Gold standard across many cycling countries.
- The bicycle parking plans in the development do not meet Fingal County Council’s own development plan 2017-2023 in Chapter 7 movement and Infrastructure “**Objective MT13:** Promote walking and cycling as efficient, health, and environmentally-friendly modes of transport by securing the development of a network of direct, comfortable, convenient and safe cycle routes and footpaths, particularly in urban areas.” Please see APPENDIX I
- In **image 2** below it states that item number 16 in the index for Block A in document **PE18105-CWO-01-ZZ-DR-A-002111- Block A - GA Elevations, Sections**. Unfortunately there is no item labelled as 16 in the diagram within this document so we cannot comment on the design of bicycle parking if the image is not provided. This is an omission from Osh Ventures limited.

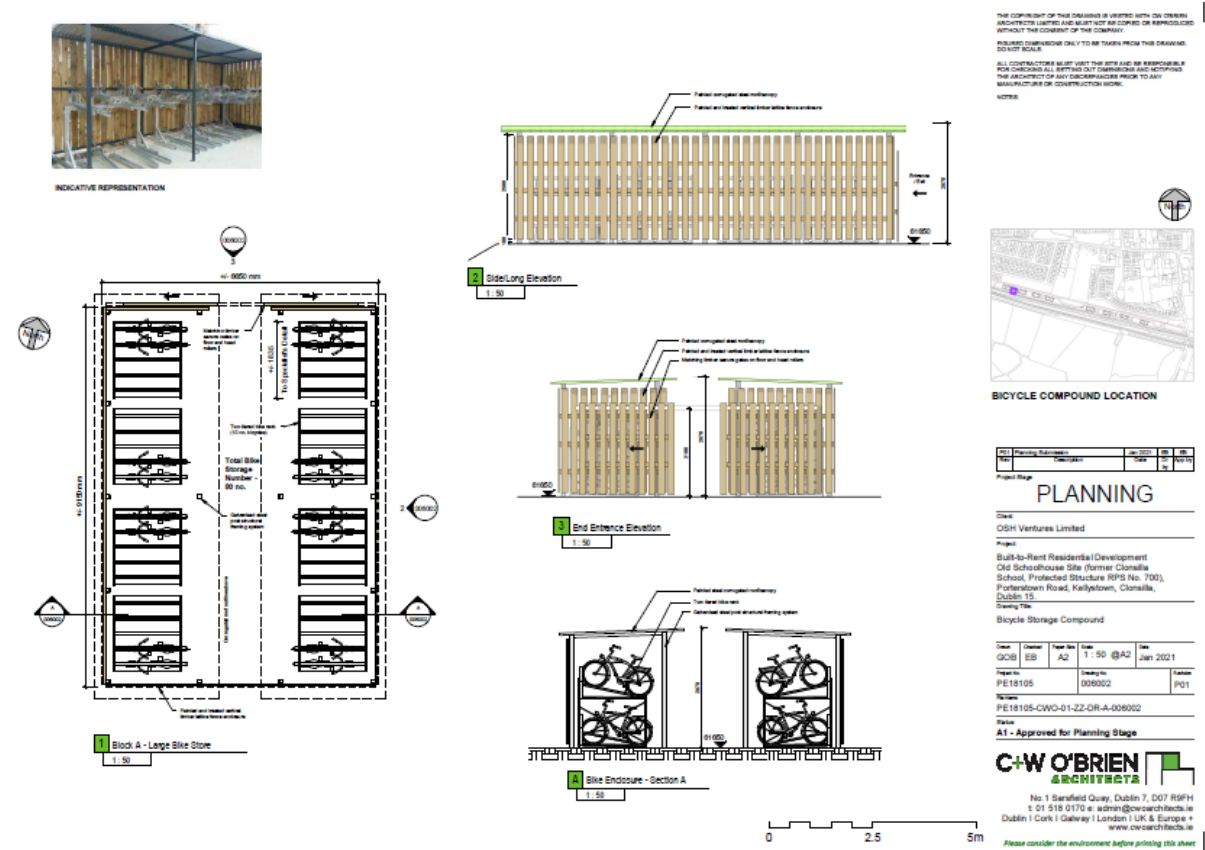


IMAGE 1 PE18105-CWO-01-ZZ-DR-A-006002- Bicycle Storage Compound



IMAGE 2: PE18105-CWO-01-ZZ-DR-A-002111- Block A - GA Elevations, Sections.

ENTRANCE TO ROYAL CANAL GREENWAY

At the western end of the development a cycle dismount gate is proposed as part of the plans as shown in Image 3 taken from **19160-15C PROPOSED ROAD MARKING AND SIGN LAYOUT**

- Fingal Cycling Campaign does not know where the Osh Ventures Limited has got the designs for a dismount gate. They are not recommendations from the National Cycle Manual or Design Manual for Urban roads and streets (DMURS). They are also discriminatory against less well able bodied people and non standard bicycles such as cargo bikes and trailers with kids in tow. The gate prevents people from accessing the Royal Canal.

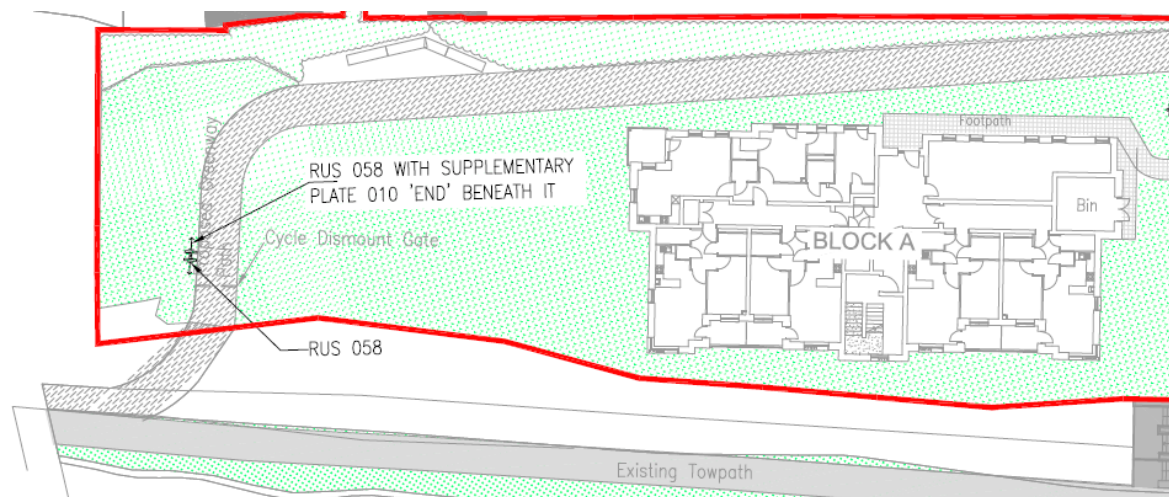


IMAGE 3: 19160-15C PROPOSED ROAD MARKING AND SIGN LAYOUT

- Osh Ventures Limited have not provided any proof of letters in their application that have been sent to Waterways Ireland for approval of a new opening to the Royal Canal at the Western end of the development. There is currently an ongoing dispute at the newly developed Hansfield SDZ a short distance away from this development. There is discussion between who is responsible for paying for the final design and layout of the entrance to the Royal Canal. We have concerns that there will be similar issues with this development as no permission has been requested or approved from Waterways Ireland who are responsible for the Royal Canal Greenway. Fingal County Council have jurisdiction for the development of the Royal Canal Greenway and work closely with Waterways Ireland for any new developments or entrances along the canal.
- Fingal Cycling Campaign recommends access control as shown in **Image 4** taken from Transport Infrastructure Ireland (TII) guidance document on rural cycle design. Ensuring cyclists are not made to dismount to access the cycleway is a key objective of TII. The gate detailed below provides better access for all types of users.

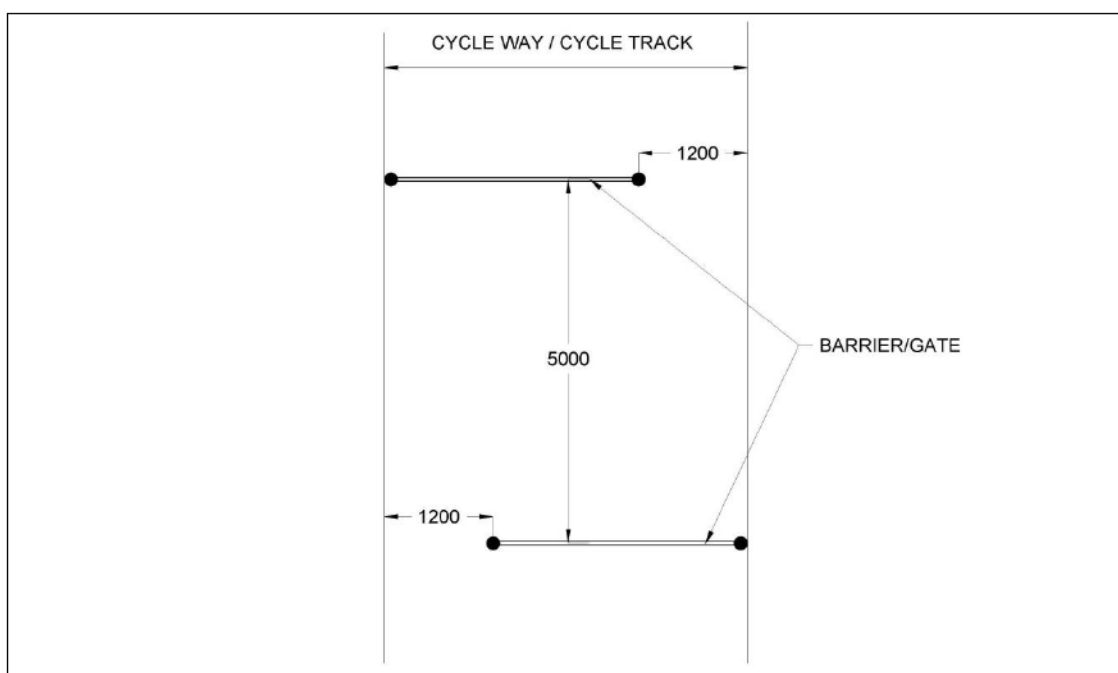
7.5 Access Control

It is preferable that access control measures are kept to minimum as this will enhance the comfort and attractiveness of the cycleway, however, it is recognised that there will be circumstances where access control measures will be required, in order to prevent open access to the cycleway for motorised vehicles, farm animals, etc.

The key objective of any access control requirement is to ensure that cyclists do not have to dismount to negotiate the access control, and it would be preferable to keep gates to a minimum. If gates need to be introduced, the self-closing type would be preferable, as this type of facility is less likely to result in cyclists having to dismount.

The design of access control gates or barriers must take into account the variety of cyclists who are likely to use the facility to include bicycles with panniers and trailers and trikes/ recumbents. Figure 7.5 and Figure 7.6 demonstrates the design requirements associated with the provision of approach barriers/ gates for both cycleways.

Figure 7.5 Staggered Approach Barrier



MAIN ENTRANCE TO PORTERSTOWN ROAD

Fingal Cycling Campaign has serious concerns about the design and layout of the main entrance to the development. There is an existing entrance to the proposed site along the east boundary off the Porterstown Road and is shown in **Image 10**. Osh Ventures Limited have not added any data to the Transport assessment for their planning application to An Bord Pleanála. We have attached recent traffic counts performed by Fingal County Council on behalf of Irish Rail as part of their assessment for DART+West. Data on pedestrian and cycle movements is shown in Table 3.2 from Irish rail report which we have also attached in this submission. The numbers of pedestrians and cyclists for the Porterstown number are in the 100's travelling to local schools such as Scoil Choilm. Table 3.2 as shown in **Image 5**

Table 3-2 AM & PM Pedestrian and Cycle Counts – CSEA Systra Oct 2019

Crossing	Time Period	Pedestrians		Cyclists	
		N/B	S/B	N/B	S/B
Ashtown	AM	150	672	65	44
	PM	574	217	53	56
Coolmine	AM	395	103	34	35
	PM	255	81	33	27
Porterstown	AM	5	123	1	37
	PM	149	24	41	13
Clonsilla	AM	23	15	1	2
	PM	441	15	12	5
Barberstown	AM	0	0	2	1
	PM	0	0	3	0
Blakestown	AM	0	0	1	0
	PM	0	2	0	2

Each of the suburban level crossings experience significant levels of both pedestrian and cycle traffic. Rural level crossings exhibit very low levels of usage.

Image 5: Traffic counts from Irish Rail at Porterstown level crossing

As someone who regularly uses this route to travel to work on my morning commute this road is full of pedestrians, cyclists, parents with buggies and prams. Usually, the large numbers take up the whole span of Kennan bridge over the royal canal. Many people are also waiting on the south side of the road waiting for the level crossing to open up after a train(s) have passed. This situation will be made worse when the level crossing is closed and the desire line for pedestrians and cyclists movement will move directly in front of the new entrance to the Old school house development. There isn't any detail of how Osh Ventures Limited proposed to handle these large numbers over the approx 30 minute window of children travelling to school. Will there be a traffic light system in place at the entrance? Will cars wait for pedestrians to cross the road before exiting the site or will vehicles have priority at this location? There is a zebra crossing at the entrance shown in the promotional video on the website www.clonsilla.shd.ie but there is a large bush preventing direct access to the bridge and when you have large numbers of people crossing at approx the same period of time in the morning this design is not workable in the real world. It's not clear layout and in practice pedestrians and cyclists are vulnerable road users and will lose priority on their school commute. Please refer to detailed **Image 6 PP252-02 Detailed Landscape**

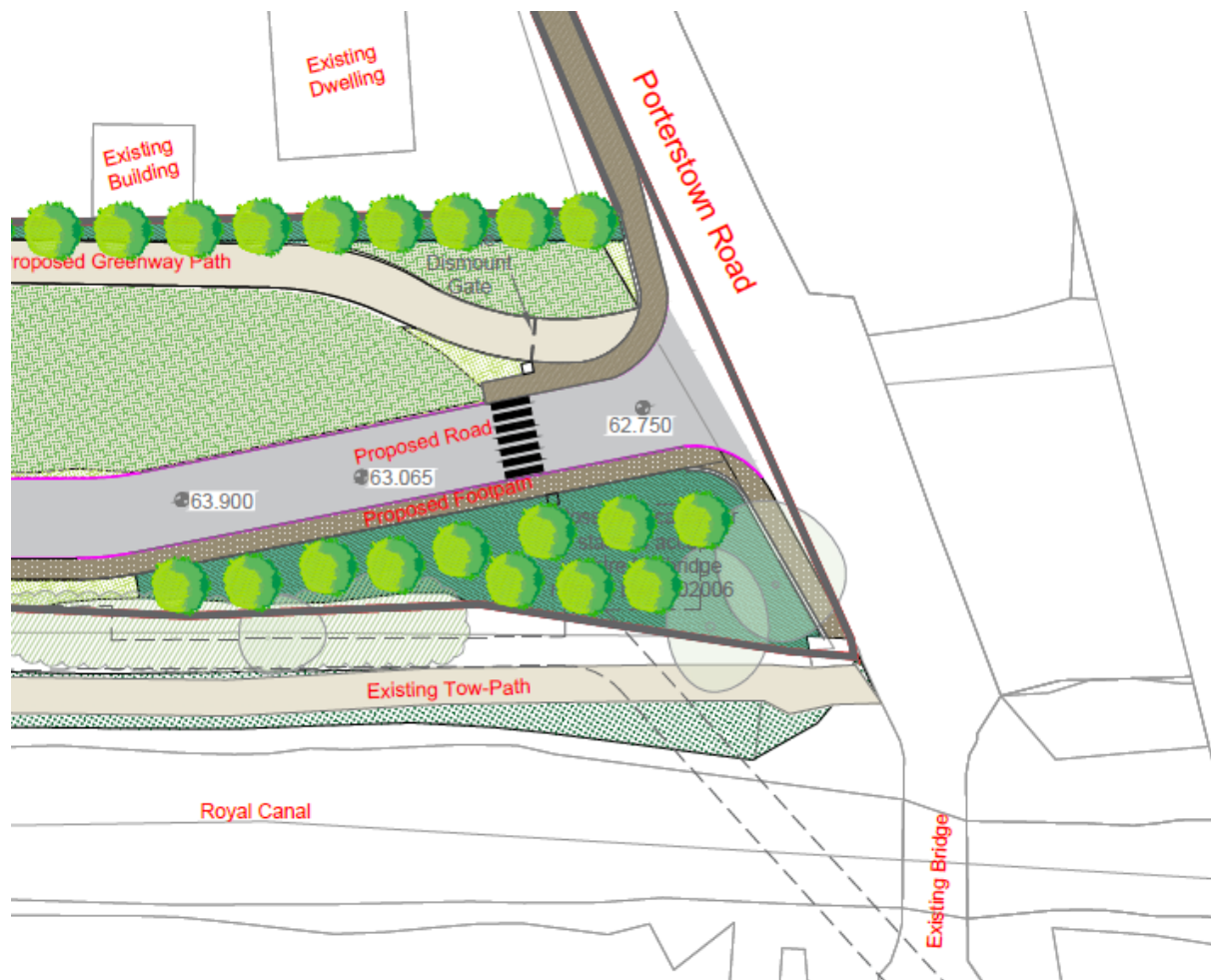


Image 6: Large amount of trees and shrubs blocking access to proposed new pedestrian and cycle bridge **PP252-02 Detailed Landscape**

Fingal Cycling Campaign's opinion that the issue with large numbers of students travelling to local schools was not considered as part of the road safety audit as shown in document **Road Safety Audit Report** by ORS Consultancy firm. The auditor's approach is more about the internal workings of the new layout and design and road layout within the development. The ORS consultants also state that their terms of reference were related to the design and not to the external implications of increased vehicle movements on the Porterstown road.

The terms of reference / procedure for the Audit were as per the relevant sections of the Transport Infrastructure Ireland Road Safety Audit Standard

GE-STY-01024. The audit examined only those issues within the design relating to the road safety implications of the scheme and has therefore not examined or verified the compliance of the designs to any other criteria. The Road Safety Audit should not be treated as a design check. The problems identified and described in this report are considered by the Audit Team to require action to improve the safety of the scheme and minimise accident occurrence.

Fingal Cycling Campaign acknowledges that the auditors have highlighted the danger of pedestrians crossing the main entrance of the site. They have referred to using tactile paving in “Problem 7” (**Image 9**) about warning pedestrians to vehicles at the entrance. Unfortunately, they have not made any measures to slow or control vehicle movements as they egress from the entrance. This is a major problem and needs to be addressed as DMURS does not account for this situation with 100 to 200 people crossing a junction over a 30 minute timeframe.

Also of concern is that the consultants have not provided any supporting documentation on collision data or speed count data. Fingal Cycling Campaign has provided some data from Irish Rail on pedestrian and cycling movements. Should this design go ahead without further data on speed at this location? 1 in 10 pedestrians will die if hit by a car at 30 Km/H. The current road layout is 50 Km/H. If you are hit by a car at 50 Km/H a pedestrian has a 50:50 chance of survival. Please refer to **Image 7** from the Road Safety Authority. Fingal County Council is moving towards 30 Km/H speed limits in all urban areas. This development should take this into consideration. For more information visit www.love30.ie

Taken from Road safety Audit report:

Documents/information not supplied:

A. Collision Data

B. Speed Count Data

C. Traffic Count Data

at 30 km/h – 1 in 10 will die



Design: Lyle Balle International Print-Mediam Printers Ltd.

at 50 km/h – 5 in 10 will die



at 60 km/h – 9 in 10 will die



Image 7: Impact of vehicle speeds and likelihood of death

Also, they have not mentioned the huge numbers of students using this route in the mornings and evenings. This may have been missed due to site access difficulties during COVID-19 pandemic as mentioned in their report. This doesn't solve the safety concerns and they have failed to address this in their audit and this is a serious omission on Osh Ventures Limited and OSK Consultants. From the engineering report it states that Fairhurst Consulting Engineers are dealing with issues to site access and the new pedestrian flyover bridge, although there is no further information supplied in Osh Ventures Limited application to An Bord Pleanála. This statement from Page 8 from the **Engineering report 19160(4) - Engineering Report Rev 4**

Fairhurst Consulting Engineers are dealing with the main transportation issues, site access and capacity for the possible/potential pedestrian flyover bridge to be accommodated on the site near the main site entrance.

Fingal Cycling Campaign foresees major issues with how this entrance will work with vehicles moving in and out in the morning and evenings for residents commuting to work and people arriving to the crèche and how drivers will navigate through the large numbers of people crossing the entrance in the morning and evenings to access the new flyover bridge and also the future movements of people crossing from Kellystown development into Clonsilla village and environs. We would ask for more details on the safety of this design and a further review and counts taken when lockdown levels reduce in the near future. We acknowledge Fairhurst have provided safe pedestrian and cycling within the development as stated in their **Engineering report 19160 (4) - Engineering Report Rev 4**. Please refer to objectives in **APPENDIX I**. The Fingal Development plan states in relation to traffic calming and road construction measures, specifically **Objective MT37** and **Objective MT40**.

Fingal Cycling Campaign doesn't understand why proposed alteration to exit as shown in documents **133967-sk1003-A Future Site Access Alteration** and **Image 8** is different to road layout in detailed master plan documents (**Image 6**) and promotional video on the website. Does Osh Ventures limited have permission to change the road layout when Kennan bridge and level crossing is closed by Dart+West? This would make speeds faster at this turning and reduce the corner radii as recommended by DMURS.

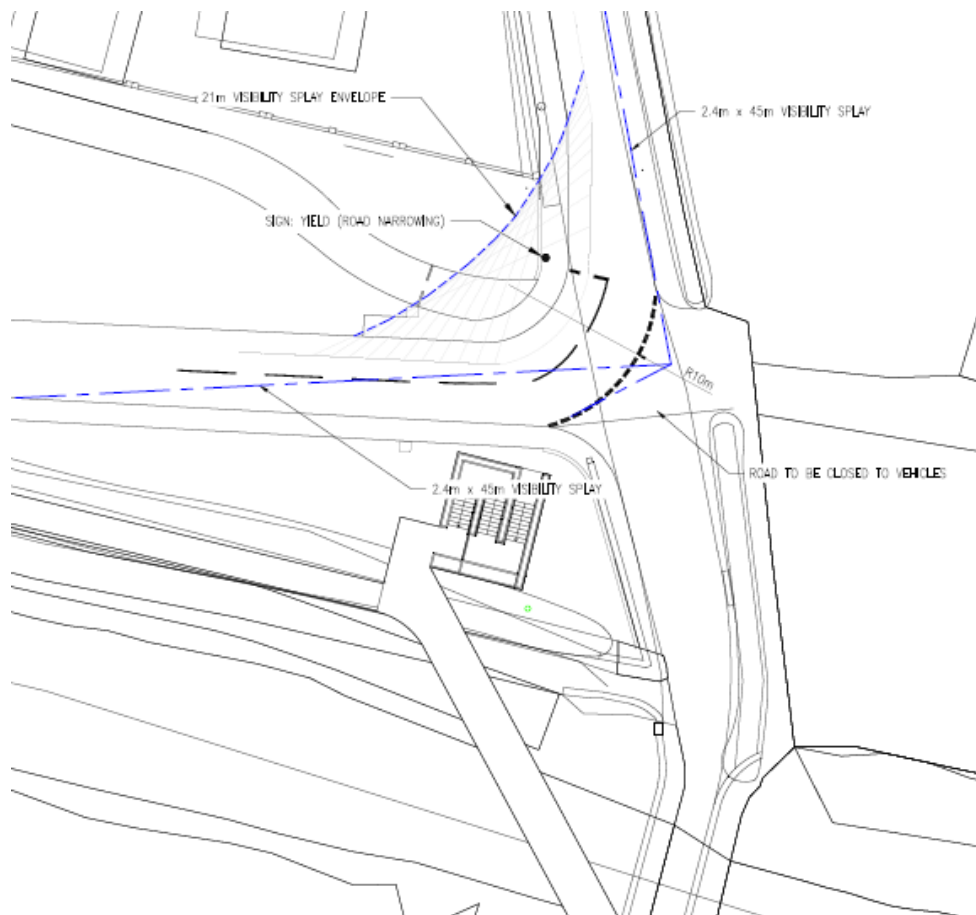


Image 8 : 133967-sk1003-A Future Site Access Alteration

Problem No. 7: Tactile Paving

Location: Internal Access Road & Access Junction to Porterstown Road

The audit team note that there is no information on the drawings regarding tactile paving to be provided. Tactile paving should be provided at the footpaths at the shared surface and at crossing points to indicate the presence of traffic to pedestrians. Tactile paving should also be used in all locations where the footpath terminates.

Recommendation:

The design team should ensure that appropriate tactile paving provisions are provided for throughout the scheme and to mark these clearly on the drawings.

Image 9: Problem 7 on Tactile paving taken from Road safety Audit report.



Figure B.3 Proposed new access junction location (gate on left) and existing private access junction (right) as viewed from the level crossing signals north of the canal (Source: Google Maps)

Image 10: Photo of entrance taken from Road safety audit report

CYCLING GREENWAY ALONG THE NORTHERN BOUNDARY

Fingal Cycle campaign welcomes the greenway route on the northern edge of the development. It states in the maps that the width of the proposed greenway will be 3 meters wide. This links in with the minimum requirements as stated in the National Cycle Manual. For a high density area the greenway route should be at least 3 and possibly 5 meters wide as recommended by Transport Infrastructure Ireland as shown in **Image 11**. Although we recognise that space may be a limiting factor in this development we would request that this greenway route is given further review to make it at least 4 meters wide to reflect the high density usage.

Section 1.9.3 National Cycling Manual. *Shared facilities are disliked by both pedestrians and cyclists and result in reduced Quality of Service for both modes. With the exception of purpose-designed shared streets, shared facilities should be avoided in urban areas as far as possible. “Where shared facilities cannot be avoided, there are a number of considerations as follows that will help both cyclists and pedestrians to be aware of the other’s presence. : Shared facilities next to vehicular traffic should have a minimum combined width 3.0m.”*

We welcome the segregated shared cycle and pedestrian path along the Porterstown road and is safe for cycling for all ages and abilities. The shared path lane in colour grey is highlighted in . Image 6 was taken from . There is no reference to the width of the path. Is it 3 meters or 4 meters? Is it less than 3 meters wide? It would be best to have a 4 meter width as it is shared for most of it. The National Cycling Manual recommends a **minimum** of 3 meters for shared spaces.

Table 4.1: Range of Mandatory Widths for Cycle Facilities

		Desirable Min (m)	One Step Below Desirable Min (m)	Two Steps Below Desirable Min (m)
One Way (Cycle Facility)	Low Volume	2.0	1.75	1.5
	High Volume	3.0	1.75	1.5
Two Way (Cycle Facility)	Low Volume	2.5	2.0	1.75
	High Volume	3.0	2.5	1.75
Shared Use One Way (Cycle Facility) with pedestrians	Low Volume	3.0	2.0	1.75
	High Volume	4.0	3.0	2.0
Shared Use Two Way (Cycle Facility) with pedestrians	Low Volume	3.0	2.0	1.75
	High Volume	5.0	3.0	2.5

Image 11: Table 4.1 from TII Rural Cycle Scheme Design (including Amendment No. 1, dated December 2014)

CONCLUSION

Fingal Cycling Campaign welcomes the opportunity to comment on the Clonsilla SHD. We feel there is scope for significant improvements in the designs to enable cycling for all ages and abilities. There are specific details in the planning application of what type of design standards will be used in the development. We acknowledge that the guidance documents are referenced but it's hard to determine the specific types of stands used especially the two tiered type which need gas assist if a bicycle is heavy and what the layout will be for residents who want to cycle. Its not clear if they will be able to secure their bicycles overnight.

This development fails to meet the objectives and guidelines detailed by Fingal County Council, DMURS and National Cycle Manual. The design contradicts Fingal Council's own development plans as referenced in Appendix I. Several straightforward, yet significant, improvements can be implemented such as the designs that Fingal County Council have put forward and adhering to DMURS and NCM design standards. The implementation of these measures would drastically increase the number of cyclists and pedestrians thus reducing the potential traffic generated by the development.

Regards

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APPENDIX I

Fingal Development Plan 2017- 2023

Section 3.4 Sustainable Design and Standards

Taken from page 454 Fingal Development plan:

*Cycle Parking Secure cycle parking facilities shall be provided in new Public Transport Interchanges, Park and Ride facilities, office blocks, apartment blocks, shopping centres, hospitals, etc., in accordance with the standards set out in Table 12.9. Bicycle Parking Stations should be provided in strategic new Public Transport Interchanges. Where a modal share for cycling is outlined within a Mobility Management Plan for a development, cycle parking should be provided at a level sufficient to support this modal share or as outlined in Table 12.9, whichever is greater. Secure bicycle racks shall be provided in all cases where bicycle parking is deemed to be necessary by the Planning Authority. Such racks should be within 25m of a destination for short-term parking (shops) and within 50m for long-term parking (school, college, office). All long-term (more than three hours) cycle racks shall be protected from the weather. All on-street stands or racks should be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism. Off-street storage/parking facilities should provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision. As such, publicly accessible cycle parking should be of Sheffield stand type; toaster racks or similar are not acceptable for publicly accessible cycle parking. Where high-density cycle parking is provided in a secure location, stacked cycle parking is acceptable provided it is easily used. **Guidance for selecting the most appropriate type of bicycle parking facility depending on location and user needs is outlined in the National Cycle Manual, 'Bicycle Parking Facilities'. Fingal County Council will have regard to this document when considering applications where bicycle parking is a requirement.***

Multi-Storey Parks and Cycle Facilities

All cycle facilities in multi-storey car parks will be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park. Where possible, segregated cycle access should be provided to basement car parks by a segregated cycle ramp or dedicated lift.

Location of Cycle Stands

Cycle parking facilities will be conveniently located, secure, easy to use, adequately lit and well signposted. Weather protected facilities should be considered, where appropriate. In addition, parking should be placed within a populated, well-supervised

area, and monitored by CCTV where possible. In publicly accessible buildings, a proportion of cycle parking should be publicly accessible to visitors. These spaces should be easily identifiable and accessible and should generally be located at ground floor level close to the main entrance of the building.

Security

Cyclists should be able to secure both frame and wheels to the cycle parking stand. Secure cycle compounds should be provided where feasible and, in particular, in large office developments, multi-storey car parks and railway stations.

OBJECTIVES FROM FINGAL COUNTY COUNCIL DEVELOPMENT PLAN

- Objective PM31

Promote excellent urban design responses to achieve high quality, sustainable urban and natural environments, which are attractive to residents, workers and visitors Section 7.1 Transportation

- Objective MT04

At locations where higher density development is being provided, encourage the development of car-free neighbourhoods, where non-motorised transport is allowed and motorised vehicles have access only for deliveries but must park outside the neighbourhood, creating a much better quality public realm with green infrastructure, public health, economic and community benefits.

2.1.4 Walking and Cycling

- Objective MT13

Promote walking and cycling as efficient, healthy, and environmentally-friendly modes of transport by securing the development of a network of direct, comfortable, convenient and safe cycle routes and footpaths, particularly in urban areas.

- Objective MT14

The Council will work in cooperation with the NTA and adjoining Local Authorities to implement the Greater Dublin Area Cycle Network Plan subject to detailed engineering design and the mitigation measures presented in the SEA and Natura Impact Statement accompanying the NTA Plan.

- Objective MT16

Promote the provision of adequate, secure and dry bicycle parking facilities and a bike rental scheme at appropriate locations, including stations and other public transport interchanges.

- Objective MT17

Improve pedestrian and cycle connectivity to schools and third level colleges and identify and minimise barriers to children walking and cycling to primary and secondary schools.

- Objective MT18

Review existing cycle infrastructure which was not designed in line with the Principles of Sustainable Safety in a manner consistent with the National Cycle Manual and the Design Manual for Urban Roads and Streets and undertake appropriate remedial works.

- Objective MT19

Design roads and promote the design of roads, including cycle infrastructure, in line with the Principles of Sustainable Safety in a manner consistent with the National Cycle Manual and the Design Manual for Urban Roads and Streets.

- Objective MT20

Investigate the use of demand management measures to improve the attractiveness of urban centres for cyclists (and public transport users).

- Objective MT21

Ensure that as soon as possible, but by the end of the lifetime of the Development Plan the environment in the immediate vicinity of schools is a safe and attractive low speed (30kph) environment, and drop-off by car within a given distance restricted.

- Objective MT22

Improve pedestrian and cycle connectivity to stations and other public transport interchanges. Section 8.3 Green Infrastructure – A Strategy • Objective GI13 Ensure the Green Infrastructure Strategy for Fingal reflects a long-term perspective, including the need to adapt to climate change.

- Objective GI17

Ensure the Green Infrastructure Strategy connects and integrates existing and new communities through appropriate planning, ongoing management and governance. •

Objective GI20 Require all new development to contribute to the protection and enhancement of existing green infrastructure and the delivery of new green infrastructure, as appropriate. • Objective GI30 Develop a Cycle/Pedestrian Network Strategy for Fingal that encompasses the Fingal Way and other proposed routes which will be screened for Appropriate Assessment and Strategic Environmental Assessment. Section 12.10 Movement and Infrastructure Sustainable Transport Walking and Cycling Walking and cycling are the most efficient modes of travel in terms of use of road-space, and the most sustainable in terms of environmental impacts.

2.1.5 Traffic Calming

“Objective MT37: Implement traffic calming on particular roads and in appropriate areas of the County, especially residential areas, to reduce vehicle speeds in the interests of road safety and residential amenity. Ensure that where appropriate, traffic calming is included as a pre-condition as part of the development of all new estates or extensions to existing estates.”

2.1.6 Road Construction and Improvement Measures

“Objective MT40: Implement a programme of road construction and improvement works closely integrated with existing and planned land uses, taking into account both car and non-car modes of transport whilst promoting road safety as a high priority. Major road construction and improvement works will include an appraisal of environmental impacts.”

“Objective MT41: Seek to implement the Road Improvement Schemes indicated in Table 7.1 within the Plan period, subject to assessment against the criteria set out in Section 5.8.3 of the NTA Transport Strategy for the GDA, where appropriate and where resources permit. Reserve the corridor of the proposed road improvements free of development”