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#### February 2014

Dun Laoghaire Rathdown County Council,
Senior Engineer, Transportation Traffic,
County Hall, Marine Road, Dún Laoghaire, Co. Dublin

Submission by Dublin Cycling Campaign on the Blackrock LAP dated Jan-2014

### **Overview**

The following are the observations from Cyclist.ie and the Dublin Cycling Campaign on the Blackrock LAP.

Dublin Cycling Campaign has always been in favour of the concept of an S2S coastal cycling/walking route. While acknowledging the difficulties that various sections of this route pose for planners/developers, we strongly refute the reasoning outlined in Section 9 of Blackrock LAP on the proposed rerouting of this long planned route. We urge DLRCC to carry out a comprehensive and balanced EIS, as stated in SL093 in Chapter 1 of the LAP. It is vital that DLRCC re-instate the plan to have a proper Sutton to Sandycove cycle route along the coast.

We must seek restrictions on the usage of HGVs in the Blackrock area, in particular articulated HGVs. The streets in Blackrock are too narrow and there are too many schools in the area to allow such large machines unrestricted access to the area.

We feel that a 30kph speed limit should be implemented in the Blackrock Village and all slip turns in the Blackrock LAP need to be designed out to afford pedestrians and cyclists a better environment for walking and cycling.

It is also important that cycling permeability be addressed in the area, in particular a wider link is need at Deepwell Gardens to link the Blackrock Park to the DART station and beyond.

# **Sutton to Sandycove**

Dublin Cycling Campaign has always been in favour of the concept of an S2S coastal cycling/walking route. While acknowledging the difficulties that various sections of this route pose for planners/developers, we strongly refute the reasoning outlined in Section 9 of Blackrock LAP on the proposed rerouting of this long planned route. The report states:

'The biodiversity and habitat of Dublin Bay is of national and international importance and large sections are designated as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Proposed Natural Heritage Area (pNHA). The S2S route originally proposed traverses sections of these designated areas. Having

regard to the likely negative impact on these local habitats, serious consideration needs to be given to the localised re-routing of the Sutton-to-Sandycove pedestrian / cycle route within the bounds of the Blackrock Plan area.'

The reasoning on potential re-routing is made despite the fact that Dublin City Council have only in the past year sanctioned a new cycleway coastal option in a directly comparable designated area of national and international importance, at the North Bull, between North Bull Causeway and Dollymount. This section of the S2S is due for construction later this year.

We urge DLRCC to carry out a comprehensive and balanced EIS, as stated in SL093 in Chapter 1 of the LAP. The overall importance of this continued S2S proposal for the local and tourism economies cannot be understated, and we shall await a comprehensive review of all environmental issues on this matter

Adoption of the original route as drafted will ensure that the long term economic and social benefits of this prestigious route for the area can still be achieved. It will also fall in line with the hopes and aspirations other Government agencies and Local Authorities with a direct interest in the S2S project as well as the thousands of citizens who wish to see the S2S project proceed.

### **HGV Usage in Blackrock Village**

We must seek restrictions on the usage of HGVs in the Blackrock area, in particular articulated HGVs. The streets in Blackrock are too narrow and there are too many schools in the area to allow such large and dangerous vehicles unrestricted access to the area.

We have recently witnessed the tragic death of a young woman cyclist in the area, as a result of a collision with a HGV. The implications of this tragic accident must be taken into account in managing access to Blackrock village and all other 'tight' areas in the DLRCC region.

A permit system should cover the Blackrock area and indeed the wider Dun Laoghaire Rathdown County and cover HGV type, weight, days and time of usage.



Figure 1: A large HGV blocks the Main Street while other traffic scurries around



Figure 2: Another view of the HGV on the Main Street waiting to turn right

# 30kph Speed Limit

There is no mention of reduced speed limits within the Blackrock LAP. This should at the very least be implemented in the Blackrock Village areas and roads. This needs to be considered on all roads that are not main traffic routes. That means Main Street, Newtown Avenue, George's Avenue, Temple Road need to be considered for a 30kph speed limit.

The benefits of a 30kph limit are recognised throughout Europe, in particular in reduced accidents, quieter streets and greater permeability for pedestrians and cyclists. For specific examples of benefits see the UK 30kph campaign results at <a href="http://www.20splentyforus.org.uk/">http://www.20splentyforus.org.uk/</a>.

# **Slip Turns**

The slip roads must be removed in all cases to reduce a particular risk for cyclists and pedestrians. The Manual for Urban Roads and Streets recommends that designers of new or upgraded road schemes should "omit left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists", section 4.4.3 of DMURS. Slip turns allow motorists to quickly turn on or off a road fast, thus putting pedestrians and cyclists in greater danger and they increase the number of crossings pedestrians must navigate.



Figure 3: A mother pushing a pram must take to the roadway to get past the HGV making a delivery on George's Avenue

Other official advice in the National Cycle Manual, produced by the National Transport Authority, says that slip turns "often give drivers an unreasonable sense of priority," and allow "vehicles to take corners at higher speeds" and "restrict views of cyclists and pedestrians", section 4.5.5.

# **Cycling permeability**

There needs to be better cycling provision within the Blackrock LAP. In particular a wider link is need at Deepwell Gardens to link the Blackrock Park to the DART station and beyond.

We note a recent public consultation process for the Frascati Road and Temple Hill area, , but there is a need to provide better facilities on the side roads.

The use of one way systems is a permeability problem for cycling. Currently there is a one way traffic



Figure 4: Another view of a HGV making a delivery on George's Avenue blocking the footpath and roadway

system along Newtown Avenue. There is a cycling contraflow, but it only begins at the Idrone Terrace junction. This should ideally continue all the way to the Main Street. Also, the join in to Seapoint Avenue should be enhanced to allow cycle traffic to flow without the use of cycle lights.

George's Avenue also needs to be addressed for permeability problems. Not only is it a one way traffic system, but it is also prone to being blocked by large HGVs making deliveries.

# **Crossings**

It is important that crossings for pedestrians and cyclists are given better timings and that existing staggered crossings are removed in line with the advice in the Manual for Urban Roads and Streets. The Manual notes in section 4.3.2, "Safety concerns regarding pedestrian crossings should also be viewed in the context of pedestrian behaviour. Research has found that pedestrians are less likely to comply with the detour/delay created by staggered crossings, leading to unsafe crossing behaviour. It will generally be more desirable, from a safety point of view, to provide a direct single phase crossing."

Also as per DMURS, the timings of traffic signals need to be reprioritised "(both new and existing) to favour pedestrians and cyclist instead of vehicles", section 3.4.2 and 4.3.2 of DMURS.

#### **Rockfield Park link**

There is a need to link Rockfield Park "The Rockies" to Blackrock Park. A future pedestrian/cycle route could be provided from Barclay Court across Temple Road through to Idrone Terrace and Blackrock Park. Perhaps the church grounds would be favourable to accommodate this. There is a laneway with steps that could also be revised and then link on to Idrone Terrace.

# **Cycling signage**

Clearer directional signage for pedestrians and cyclists would be helpful in posting quieter routes when heading inbound to the city to take a right at Temple Hill to Newtown Avenue and on to Main St, Idrone Terrace and Blackrock Park.

Yours Sincerely, Keith Byrne Dublin Cycling Campaign

### References

National Cycle Manual, December 2011

http://www.cyclemanual.ie/

Design Manual for Urban Roads and Streets, March 2013

http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownLoad,32668,en.pdf

DLR Documents, 8-Jan-2014, Pre-Draft Non-Statutory Consultation Phase

http://www.dlrcoco.ie/aboutus/councildepartments/planning/downloadit/blackrocklocalareaplan/

DLR Documents, 8-May-2013, Draft Blackrock Local Area Plan

http://www.dlrcoco.ie/newsevents/latestnews/title,9407,en.html