

c/o Tailor's Hall,
Back Lane
Dublin 8.
12th February 2016

**Senior Executive Officer,
Department of Infrastructure and Climate Change,
Dún Laoghaire-Rathdown County Council**

Re: Blackglen Road/Harold's Grange Road Improvement Scheme

Dublin Cycling Campaign (DCC) has been working for over twenty years to encourage cycling and to represent the interests of everyday commuting cyclists. We want to make streets safer for cyclists and to increase public awareness of the benefits of cycling. We want to see a quantum increase in the use of the bike for commuting to study, work and for utility and recreation purposes, recognising that a 'critical mass' of cyclists in traffic leads inevitably to safer streets. Safer streets for cyclists are also safer streets for pedestrians.

Dublin Cycling Campaign www.dublincycling.ie is a member of Cyclist.ie www.cyclist.ie and the European Cyclists' Federation www.ecf.com

Introduction

Dublin Cycling Campaign broadly welcomes this proposal for improvement to facilities on Blackglen Road/Harold's Grange which, though not formally a designated cycle route in the Greater Dublin Area Cycle Network Plan, is still an important leisure route for cyclists, and has a growing network of housing developments in the area. This draft proposal can help to increase the safety and comfort of pedestrians and cyclists using the route, which at present is extremely hazardous for these users. This consequent increased level of safety and comfort should in turn help to grow cycling numbers.

This is an important route for many cyclists, including commuting cyclists. Mountain bikers often use the route when travelling to the mountain bike trails on Three Rock mountain. Kilmashogue Lane and Tibbradden Lane are popular hill-training routes for sports cyclists, as are the access routes to Sally Gap and Wicklow Gap. For this reason cycling numbers along the present route do not show up strongly during peak traffic periods. Weekend figures can be much higher.

Safe and comfortable cycle facilities along this route have the potential to open up the route to greater use by families in the new housing developments, when travelling to school locally, or to work in Leopardstown or beyond. It is also a key route for people in the area of Stepside/Belarmine wishing to get to Marley Park. The design of this cycle route therefore needs to be of high quality and needs to be suitable for commuting and recreational cyclists of all ages.

However, we have a number of general comments that we wish to make, which we feel should help to improve the proposed scheme further.

General Points

- We note the omission of a Safety Audit report in the published documentation. A Safety Audit is a mandatory item for inclusion with schemes, and helps to raise issues, which might be overlooked by the scheme designers.
- We note the 'general' labelling used in the drawings exhibited of 'cycle path', designated by a red colour. It is not often clear whether this 'path' is an on-road cycle lane or an off road cycle track. There is an insufficient number of cross sections to clarify this issue, and thus to make clear comment in a number of areas.
- We recommend protected cycle lanes along the full length of this road, and we feel it is possible with a coordinated design approach. Due to the gradient on this road, traffic tends to move at high speed, which is dangerous for cyclists. The segregation of cycle facilities from this traffic will encourage greater levels of cycling. See suggestions below on this issue under '**Specific Points**'
- In order to ensure safety of design, the layout should ideally be as consistent as possible throughout the entire length of the scheme. In the current design, road users are asked to be constantly vigilant to understand whether they are in a shared space or not. There is a long section (600metres) of shared pedestrian and cycle space, which we recommend should be changed. – see '**Specific Points**' below. The National Council for the Blind in Ireland (NCBI) and cycling advocates, in general, are not comfortable with shared space for safety reasons.
- We suggest the consideration of the relocation in some cases, and the general upgrading of all bus stops, where space is available, to either 'island type' or 'kneeling bus facility' type bus stops as per National Cycle Manual guidance - <https://www.cyclemanual.ie/manual/detailsright/busstops/> - again see some specific suggestions below
- We wish to see consistency of approach to the treatment of entrances and side road junctions, where the cycle track should be carried through the exit/junction. It needs to be made clear, in scheme design and in any signage or markings, that **cyclists have priority** and exiting or entering cars must give way. The present draft design does not make clear how this will be achieved, and there is an inconsistency of approach. This will also need to be clarified with any new developments proposed along the route.
- We would like to see traffic calming measures inserted along the route, to discourage speeding, particularly on downhill sections, and to help to protect vulnerable road users.
- **Left Slip Turns:** Introduce left slip turns for cyclists at traffic light junctions, where possible, so cyclists don't have to wait to turn left at traffic lights

Specific Areas/Points

- a) The main area, which we wish to see altered is between **chainage 800 and 1400**, where the present design shows a shared space between bikes and pedestrians. In this area in particular there is scope for a better and safer design. We recommend that from at least Chainage 1500, travelling westwards, a transition from a main carriageway width of 6.5m to a carriageway width of 6m be inserted.

It is not clear from the exhibited drawings what the final design width is along the route, but from the cross sections shown we can assume that the overall route varies in width from a maximum of 14.5m down to a minimum 11.5m (at M50 overbridge).

We propose the following design solution for this narrowest section:

Carriageway width – 6m

Cycle track width – 1.5m on both sides

Pedestrian footpath width – 1.25m on both sides

If the available boundary to boundary width is greater along this section, **chainage 800 and 1400**, the subsequent dimensions can then be altered to suit the available space.

If the only limiting area is the M50 overbridge then a cantilevered footpath should be considered.

- b) **Kellystown Road Junction and other Traffic Lights:** There is a commonly occurring issue at this junction where the present traffic lights are not triggered for cyclists. This is a key route for cyclists coming from and going to the MTB trails on Three Rock. We recommend cycling sensors be installed here and at all traffic lights on this project so that they detect cyclists.
- c) **Kellystown Road Junction Cycle Tracks:** Cycle lanes should be provided through the Kellystown Road junction in accordance with the Cycle Design Manual. Cyclists are highly vulnerable traversing junctions such as these without being allocated their own road-space.
- d) **Pine Valley Park:** The cycle track is abandoned at Ch. 350.0. Some form of indication such as cycle logos, or advisory cycle lane could be provided within Pine Valley Park on the right hand side of the one-way access road in order to retain the already established quality of service for the cycle track.
- e) **Grass Verges:** The grass verges at Ch.1200.0, Ch.1400.0; Ch.1900.0; Ch.2050.0; Ch.2200.0 and on Sandyford Road Ch.300.0: would be better placed between cycle track and footpath or between the footpath and road to reinforce their separation and reduce the likelihood of pedestrians walking on the cycle track or cars entering the cycle track. There are traffic calming benefits in having a landscaped verge closer to the roadway.
- f) **Excessive Median Hatched Areas and Length of Right-turn Lanes:** Ch.500.0; Ch.1450.0; Ch.1600.0: The amount of pavement given over to median hatching at junctions appears excessive considering the design speed of the road. The length of right-turn lanes proposed also appears similarly excessive considering the design speed of the road and the amount of traffic likely to use the junctions.
- g) **Toucan Crossing Location:** Chainage 1050 – It is not clear why the present location of the toucan crossing was chosen as such. We assume it is meant to serve residents and users of Ticknor Park. If so it should be moved closer to the junction to facilitate local users.
- h) **Cycle Lanes Indicated as Advisory should ideally be Mandatory**
 - a. Junction Approach Ch.030.0: These cycle tracks should ideally be mandatory and not advisory to ensure that there no doubling up of queuing vehicles at the junction and blocking of the cycle lane.
 - b. On Sandyford Road and Enniskerry Road: All cycle lanes on Sandyford Road are indicated as advisory and not mandatory. Unless going through the junction, across accesses and bus bays, all cycle tracks should ideally be mandatory. This is very important for the area south of Lambs Cross where there are shops and schools.
- i) **Risk of Illegal Parking in Cycle Lane:** The Enniskerry Road on-road Cycle Lane is likely to be parked on and blocked, particularly in front of shops and school. In order to protect this area from parking, a slightly raised cycle track should be installed, relative to the adjacent roadway. However as this area has shops and schools it really needs special attention. Ideally more space should be provided in the road section for a raised median between road and cycle track, as per normal Dutch practice, i.e. edge of road to have 125mm kerb, 0.6m width concrete median, drop down 50-75mm to cycle track level and then up 50mm to footpath.
- j) **No Standard Detail for Sandyford Road Cross-section:** A level difference between the footpath and cycle track is required. It is unclear from the drawings what is the proposed cross-section arrangement for Sandyford Road. For the off-road cycle track sections (verge between road and cycle track) there should be a level difference between footpath and cycle track as required by the National Cycle Manual.
- k) **Hillcrest Road/Sandyford Road Junction:** - Move pedestrian crossing on Hillcrest closer to the Sandyford Road alignment. The proposed location will encourage 'illegal' pedestrian manoeuvres.
- l) **Lamb's Brook Junction ;** Chainage 200, Sandyford Road – cycle priority should be maintained across this junction

Please see below for indicative screen grabs to illustrate some of the points made above. We are happy to discuss any of the issues raised above, with Council officials and designers, at any stage. Feel free to contact the undersigned.

Yours

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