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A member of

Cyclist.ie – A member of

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National Transport Authority,
Harcourt Lane,
Dublin 2



Submission by Dublin Cycling Campaign on the NTA Cycle Network Plan

Introduction

Dublin Cycling Campaign is an independent, voluntary group which has been working to promote utility / transportation cycling for over 20 years. We were grateful to receive a briefing on the Cycle Network Plan from Seamus MacGearailt of Roughan O'Donovan / AECOM on 11th March 2013, and for the opportunity now to make a submission on the Plan.

We acknowledge the parallel submission made by Skerries Cycling Initiative, and refer to same where relevant. We have been grateful to members of Maynooth Cycling Campaign for their contribution, particularly on issues in the Maynooth and Kildare region. We also thank Tristan Dunne and Damien Carbery who allowed us access to their submissions.

Our submission does not aim to cover in detail all of the routes mapped out in the Cycle Network Plan, but sets more emphasis on its overall context and strategy, in terms of the wider goal of replacing sedentary transport with cycling.

Dublin Cycling Campaign welcomes this Cycle Network Plan. The approach to developing the plan is methodical, clear and comprehensive, and the authors have considered a wide range of options for cycle routes.

- We welcome the considerable effort to improve provision for cyclists which has evidently been taken in the preparation of this document.
- The Plan is consistent across local authority and county borders, which is to be commended.
- The objective assessment of quality of cycle journeys, following on from the work done for the National Cycle Manual, is commendable. We agree with the suggested A/A+ level of service recommended for all cycle routes above 500 cyclists in peak period, and for a minimum B standard for all routes regardless of numbers. These minimum targets must be recognised into the future. We do note though some issues with regard to the basis of the Quality of Service measurement – as described below.
- The Campaign warmly welcomes the recognition given to the benefits of removing one-way street restrictions. The multi-lane, one-way 'Formula One' system in central Dublin is the scourge of cyclists. We are particularly happy with the recommendation for 'provision of contra-flow cycle routes on all one way streets where these would provide for shorter cycling trip lengths'. This issue has been under ongoing discussion between Dublin Cycling Campaign and Dublin City Council and must, with the Luas works now in full swing, be acted on with urgency.
- Suggestions for permeability of some city blocks are also welcome. We note below the implications of the recent NTA proposals for general traffic management in central Dublin.
- We also welcome the exploration of alternative route options and the suggested use of public spaces, and 'permeability' points, to improve the cycling journey and create relatively traffic-free journey options for cyclists. This also includes the proposals for a number of bridges and/or underpasses at different locations
- The inclusion of suggested greenway routes throughout the city, e.g. the Dodder, Poddle and Tymon Park Greenways will benefit both utility and leisure cyclists.
- The measurement and prediction of cycling trips and preparation of trip model, though long overdue, is to be welcomed.

- The mentioning of a floating bridge for cyclists (page 47) shows a very welcome openness to creative ideas.

We are aware that implementation of the Cycle Network Plan falls to the local authorities, but would submit that the Authority has the expertise, and perhaps a responsibility, to prioritise the most urgent and beneficial portions of the Network.

General comments

The Cycle Network Plan's place in NTA's role of cycling promotion

Bearing in mind that the NTA's own Implementation Plan allocates €65m to fund both 'integration of all transport modes' and 'provision of sustainable transport', the concern arises that the emphasis on creating physical infrastructure is too great. A clear, evidence-based 'Hierarchy of Measures' for promoting cycling is set out in the National Cycle Policy Framework; it places more emphasis on the likes of cycling promotion, lower speed limits, HGV strategies, road pricing or congestion charges, and cycle skills training.

The 2008 Act lists the NTA's objective at 10 (e) of seeking 'increased recourse to cycling and walking as means of transport'. We would contend that, while we welcome the Plan, the 'soft' measures advanced by the NCPF must form a large part of the work towards that objective and must not be given lower priority than engineering works. In particular we feel that the following need to be urgently addressed:

- Public education on sharing road space safely and understanding the needs of other road users, including the 1.5m clearance message for motorists overtaking cyclists (see Figure 1 below).
- Cycle skills training for school-goers including competence in traffic environments
- Promotion of the benefits of cycling and increased cycling numbers for the individual and for society
- Enforcement of parking regulations, particularly on cycle-lanes, and greater efforts by Gardaí to prevent endangerment of cyclists by drivers of motorised vehicles.
- All professional drivers to undergo assessment for Certificate of Professional Competence (CPC) that deals with safe interaction with cyclists (taxi drivers must be brought into the CPC system as a matter of urgency)



Figure 1 - Sign designed by Mayo County Council

While we welcome the proposals for the Cycle Network subject to these comments, we feel it must make clear its own place as part of a hierarchy of measures aimed at promoting cycling, and bring those measures to bear on each of its proposals and conclusions. We would like to see detailed cost/benefit analysis of those measures compared with the construction of physical infrastructure.

Place and transport functions in urban situations, 30km/h

We feel the Cycle Network Plan should more closely reference the use of good urban design to enhance cyclability, as outlined in the Design Manual for Urban Roads and Streets (DMURS). This manual calls for the creation of 'Liveable Streets' i.e. public spaces which not only have a transport function but also fulfil their original purposes as places of social activity, commerce and play. DMURS should be referenced in Chapter 2 of the Study and inform, in particular, the types of design solutions most appropriate for Dublin's urban villages. It is a critical part of overall guidance policy on developing cycling.

These more urban functions are ideally matched to - and can be shared with - cycling as a high-capacity transport mode. The PLACE functions of streets must be emphasised. Quality Bus Network routes have been developed

through nearly all of our urban villages, sometimes presenting inhabitants with a queue of buses forming a 'wall of steel' down the street. Consideration might be given to relocating some of these bus routes. This would certainly facilitate the liveability and commercial success of streets; it might also assist with the efficient running of the bus services. Certainly the use by cyclists of QBN lanes, with the frequency and speed of buses and coaches, and increasingly taxis, is becoming problematic.

More generally the instrument of introducing lower speed limits (with changes in the street design, where appropriate) needs to be given greater priority in the Plan.



Figure 2 - Groningen street scene: 'Place' functions co-existing with 'Movement' function

As well as identifying Primary, Secondary and Feeder routes, the cycle network plan should identify 30km/h feeder zones. These will enable cyclists to get to the feeder routes in safety and comfort by bike. These 30km/h zones should include high density population areas, housing estates and areas around schools. This is a low cost way to make the streets safer for cyclists and pedestrians, particularly children. 30km/h zones have been found, not least even in Dublin where compliance levels are low, to contribute to the safety of all road users, including car drivers.

We fail to understand why Primary and Secondary schools are not marked on the Cycle Network Plan maps. These should be prime targets for future cyclists and deserve special attention.

Similarly we would mention Pedestrian Zones. Chapter 2 should recognise that permitting cyclists to cycle in pedestrianized areas can work where pedestrians are given priority and the volumes are not too high. Cyclists are allowed to cycle in pedestrianized areas in the city centre of many European cities. See Figure 3 below.



Figure 3 – Cyclists (a large group on a study tour in this case!) in Leicester city's pedestrian zone

Quality of Service

The formula for calculating the Quality of Service should be explicitly stated since it differs from the one in the Cycle Manual.

The speed of traffic appears to be taken into account as part of criterion (v) "Comfort Factor". However, this should be a separate factor and have a higher weighting than pavement condition and junction time delay. The absolute numbers of HGVs and buses is also relevant - and not just as a percentage of overall traffic.

The nature of the junctions encountered en route (as against only considering the delays experienced at them) must be given much greater attention in the measurement of QoS. For example, it is *an entirely different journey experience* to cycle through the High Street / Christchurch / Nicholas Street / Winetavern Street junction or to cycle through the Walkinstown roundabout than it is to pass through most single-lane three or four armed junctions. The QoS measurement needs to be revised and the Cycle Network Plan amended so as to prioritise dealing with these most hostile elements of the road network.

Confirmation that all routes will be available 24 hours a day (unlike the current situation in e.g. Ranelagh) should be further emphasised in the Cycle Network Plan. Likewise, Quality of Service will vary along with the levels of traffic, lighting and anti-social behaviour at various times of the day or week and these factors should be taken into account.

We anticipate that the National Cycle Manual will be updated based on feedback and experience generated by the Cycle Network Plan.

Parking

We welcome the references throughout the Plan to bike parking at public transport hubs, but would recommend that these references are stitched into the conclusions of the report. The Cycle Network Plan should identify the variety of locations / destinations where significant amounts of secure bike parking will be required, and not just travel hubs.

Security is not a comfort or luxury issue: there is a real disincentive to re-start cycling after having a bike stolen and this is impacting cycling numbers. Locating parking in passively-observed, highly-illuminated areas is important; CCTV and exclusive physical enclosures/access controls are useful also.

Junctions

Further to the point above (under QoS), we are disappointed that there is no specific reference in the Plan to the considerable number of junctions that are dangerous or threatening to cyclists. We refer you particularly to the "10 worst places" reports submitted to Dublin City Council in 2011 - <http://www.dublincycling.ie/10worst> All of the junctions highlighted in these three reports need to be targeted and referenced in sections referring to overall quality of service.

Furthermore, we note that the vast majority of the photos shown on pages 1 to 10 of the Cycle Network Plan are of links rather than junctions. This weighting of images towards links may have the unintended effect of deprioritising the need to address junction design as a matter of urgency. For too long the excessive focus of traffic engineers on junction capacity (for motorised vehicles) has meant that the safety and perceived safety of cyclists at junctions is too far down the priority list. This Plan needs to break with the - now discredited - tradition of privileging motorised traffic over non-motorised traffic.



Figure 4 - Talbot Memorial Bridge, still part of a high-speed multi-lane system

Therefore the integration of cycle traffic with motorised traffic at junctions needs further attention. Challenges like the following must be tackled:

- Long delays at lights (UK and Ireland being the only countries who forbid parallel 'green man' and 'green to traffic' crossings; options like left-on-red for cyclists are not availed of);
- Multi-lane one-way streets;
- Gyrotories;
- Dublin's long one-way street detours;
- HGVs designed for motorway use mixing with inappropriate traffic in urban situations and making deliveries during rush hours when there is a high flux of cyclists in traffic.

Chapter 1 Existing Cycle Route Network

Our comment on the use of bus lanes relates to 1.2 in Chapter 1.

Road surface quality and maintenance is deficient at present – this is a major disincentive for cyclists.

Chapter 2 Future Cycle Network Planning

We commend the methodical approach of the Plan. Detail on the derivation of the GEH statistic and its significance might be helpful to the reader.

Whether planning for a 10% increase in modal share within the M50 cordon is adequate – particularly in light of the 17% recorded annual increase recently observed in the Dublin City Council area - might be assessed. It is foreseeable that, as the current cultural shift towards cycling (and its attendant improvements in safety and convenience) take hold, modal shift will make further large gains.

Chapter 3 Dublin Metropolitan Area Cycle Network

In September 2013 the NTA issued a document calling for radical changes to the layout of traffic in Dublin city centre. The Dublin Cycling Campaign welcomed many measures set out in the document and its underlying philosophy, and feels strongly that its implementation would be of great benefit for the city.

The analysis of the 'gateways' to Dublin city centre, and their particular challenges, is welcome.

An existing important commuting route runs along the Dundrum Bypass (particularly northbound/downhill) from the residential areas south of Dundrum to Sandford Road via Dundrum Road and Milltown. There are no non-circuitous alternative routes to this well-used one, so the plan needs to acknowledge that this route needs to be enhanced (even if a roughly parallel circuitous route is developed along part of that corridor).

In the *Gateway 2: Drumcondra Road/Dorset Street* section, the suggested Clonliffe Road/Jones's Road alternative route to Mountjoy Square is 1220 metres while the normal route along Drumcondra Road/Dorset Street is 863 metres. This almost 360 metre difference is not particularly significant along the entire journey but cyclists will naturally take the shortest route. Alternative routes, especially those that are in any way longer, will need to be considerably better than the shorter route. They will also need to be heavily advertisted / signposted to cyclists.

p26 Rathmines Road - We welcome the suggestion of a 30kph zone here. We think this approach should be applied to other urban villages, e.g. Phibsborough, Kimmage, Donnybrook, Ranelagh, even if a greenway is also proposed. Dublin's urban villages are destinations in themselves and therefore have a strong social/place function as well as a transport function. This point goes back to the need for the designers to take more of an urban-design led approach, rather than a purely engineering approach – using the Design Manual for Urban Roads and Streets (DMURS) - in arriving at 'solutions'.

p28 (*Local Cycle Route Network Factors - Permeability Links/Shortcuts*) it is good to see the lack of permeability being acknowledged. A secondary school in Dublin 15 worked with Irish Architecture Foundation on a project about the lack of permeability- <http://placeshaperslcc.blogspot.ie/> and the findings would be of interest to the Cycle Network Plan authors. A similar study as part of the Now What project made comparable findings for Balbriggan - <http://nowwhatremaking.blogspot.com/>. Such studies can be extrapolated to many areas of Dublin's residential districts and hinterland.

In Blanchardstown, there is a line drawn on the map along the Royal Canal between Castleknock and Clonsilla but it is not clear that it will be feasible to have a greenway on this section.

In the *Gateway 3: Phibsborough* section, the suggested alternative route along Royal Canal Bank is very attractive.

Ideally the speed ramps would be removed and motorised traffic limited in some form. The exit point of the end of that route would need to be considered carefully so that users are not pushed further from their destination, which would make it less attractive, despite the issues at Doyle's Corner.

p34 - Gateway 4 - The Royal Canal bypass is certainly a pleasant bypass of the Doyle's Corner junction.

p36- Strawberry Beds could be made into an attractive route more economically than the War Memorial route.

p42 - Bike & Ride to the Maynooth Commuter Line - Lighting and security measures at Broombridge will have to be very good to combat anti-social behaviour experienced there.

Chapter 4 GDA Hinterland Cycle Network

FG1- The Draft Plan refers repeatedly to an 'East Coast Trail' , which corresponds to Corridor 5 of the NRA Scoping Study (2010). It is in this context that the '*Fingal Coast & Castle Way*' must be properly reflected in the Plan.

This issue is dealt with in more detail in the submission by the Skerries Cycling Initiative (SCI), who have been in co-operation with Fingal County Council regarding this and many other cycling issues in the east Fingal region. We would support and defer to the SCI submission for all issues in east Fingal.

Hard shoulders can sometimes be useful for commuting cyclists. Their legal use by cyclists requires rationalisation. For routes such as F1, where a national road has been supplanted by motorway, consideration should be given to allocating the hard shoulder to cyclists and creating physical segregation by planting or kerb, etc.

Conclusions

We warmly welcome the NTA's Cycle Network Plan and support its early implementation subject to the above comments. At the same time we must reiterate that no network on its own will instigate the 10% National modal share target, which effectively translates into a 20% modal share target for Dublin. Cyclists will still have to share road space with motorised vehicles at local level, where urgent improvements are needed. 'Soft' measures must still be given high priority.

We are disappointed that there is no specific reference in the conclusions to suggested priorities, or, at the very least, a prioritisation tool for investment. While reference can be made to the 2021 projected levels, we suggest that specific main priorities should be clearly outlined to guide decision makers.

Of critical importance to the rollout of any agreed Cycle Network are the ongoing staffing levels and the requisite funding. These need to be referenced in the study, particularly in the context of continued staff retirements and budget cuts. In the UK many cycle schemes are co-funded by the NHS, in recognition of the health benefits that cycling brings. There is a need to establish this potential funding link, here in Ireland, to support the Cycle Network rollout.

As the Plan is finalised and implemented, Dublin Cycling Campaign would be glad to provide ongoing consultation, particularly on detailed local issues.

I would be grateful if you can provide an acknowledgement of receipt of this submission.

Yours sincerely,

Muireann O'Dea
Chair
Dublin Cycling Campaign
www.dublincycling.ie

Dublin Cycling Campaign for safer, quieter, greener, more sociable streets. 11th October 2013.

END