



## Dodder Greenway Emerging Preferred Route Consultation - October 2018

### 1.0 Introduction

Dublin Cycling Campaign is the advocacy group for cycling in Dublin. Dublin Cycling Campaign is the leading member of Cyclist.ie, the Irish Cycling Advocacy Network (ICAN). Dublin Cycling Campaign wants to make Dublin a safe and friendly place for everyone of all ages to cycle.

Dublin Cycling Campaign is extremely disappointed with the proposed Dodder Greenway emerging preferred and alternative routes at this non-statutory consultation stage. It appears that the long term potential use of this route has not been adequately considered. The Dodder Greenway is both a designated Greenway and Main Cycle Route (SO3) under the 2013 GDA Cycle Network Plan. It will carry a significant amount of cycling commuters, and has the potential to greatly increase transfers from car commute to cycle commute in the future. It is imperative that this route is designed to the highest standard to accommodate expected future growth.

Both the emerging preferred and alternative routes, have too much poor quality shared space, have unnecessary environmental impacts, or pose potential safety risks to users of the greenway. The proposal ignores policy in NTA's National Cycle Manual, DMURS, and the Dublin City Development Plan. This is unacceptable and should be revisited.

### 2.0 General Observations

#### 2.1 Missing Options Report

Analysing this proposal is made harder than necessary. We understand that the City Council and Consultants RPS have produced an Options Report, which apparently eliminated some route options, which are not part of the present consultation. Without this Options Report, that discusses why these are the emerging preferred and alternative routes, it is impossible to know what options have been fully

examined by the design team, or for what reasons options they were eliminated. Holding a public consultation without releasing all the relevant information, limits the value of the public consultation process as the public cannot provide informed feedback.

## 2.2 Quality of Service of Proposed Route

Section [1.4 of the National Cycle Manual](#) sets out clearly the five quality standards that a cycle route will be defined by, ranging from the highest level A+ down to Lowest level D. It is not clear from the emerging preferred routes that either of them would meet the high quality required of this strategic future cycle route. In many places the width of the greenway drops to 3m, which means a C quality-of-service route. The route suffers from poor safety in certain areas too. Providing a poor quality route would not fulfill the requirements laid out in the GDA Cycle Network Plan.

It would also seem that the proposed routes do not meet the 5 'Needs of Cyclists' as defined in Section 1.2 of the Cycle Manual, in particular Safety, Coherence and Directness.

## 2.3 Shared Space in the Urban Context

The proposed shared space design is unacceptable within the context of a busy urban route, with the expected high volumes of usage that this route is expected to carry. This route needs to be designed to cater for commuter cyclists who would expect directness and simplicity on their route. It is a poor design decision to attempt to mix potentially fast cyclists with pedestrians in a shared space. This proposed design unnecessarily puts cyclists and pedestrians into conflict in too many locations.

The NTA's National Cycle Manual recommends against this type of design. Following the National Cycle Manual is a requirement of policy MT1 and MT7 of the Dublin City Council Development Plan. National Cycle Manual states in section 1.9 that:

*Urban design of town and city centres should aim for the optimum pedestrian Quality of Service consistent with the overall traffic plan. Shared facilities between pedestrians and cyclists generally result in reduced Quality of Service for both modes and should not be considered as a first option...*

*... 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.*

Opting for a shared space for this greenway route is against the National Cycle Manual. The council should opt for a similar design to the Royal Canal Greenway,

which has a segregated cycle track and footpath. This design is far more appropriate for an urban context with higher volumes of people.



A photo-montage of the Royal Canal Greenway with segregated space between pedestrians and cyclists. There is a curb separating the cyclists from the pedestrians.

### 3.0 Specific Zone Feedback

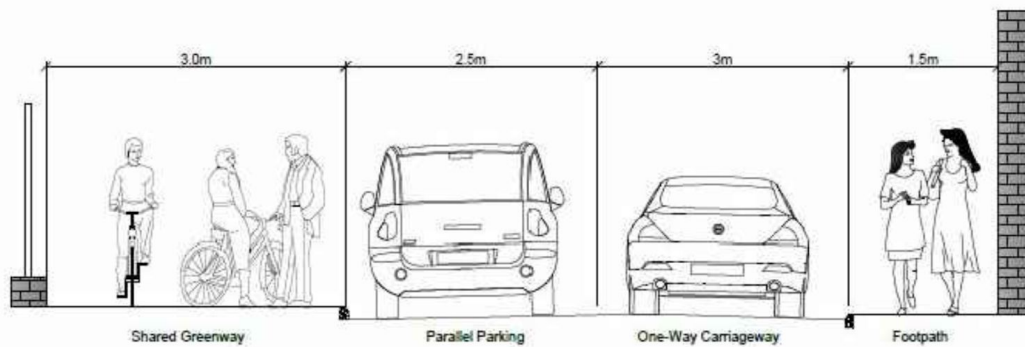
In this section we provide specific feedback on each zone of the emerging preferred and alternative route.

#### 3.1 Construct both routes in Zone 1 and Zone 2

We would hope that both the emerging and alternative preferred routes in Zone 1 and Zone 2, together with some alterations might be developed. This will greatly increase permeability in the area for pedestrians and cyclists, and help to link up to the East Coast Trail in Sandymount, currently undergoing detailed design.

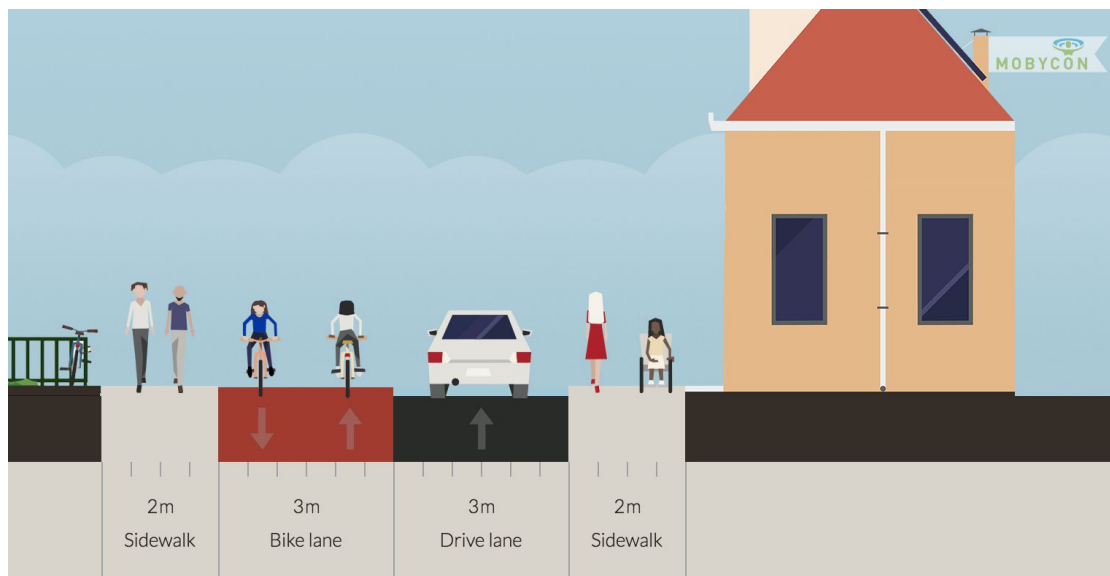
#### 3.2 Thorncastle Street; Cross-Section 1, Zone 2

The current proposals on Thorncastle Street as part of the preferred route are of poor-quality for pedestrians and cyclists. Below is cross-section 1-1, which is for a short section of along Thorncastle street.



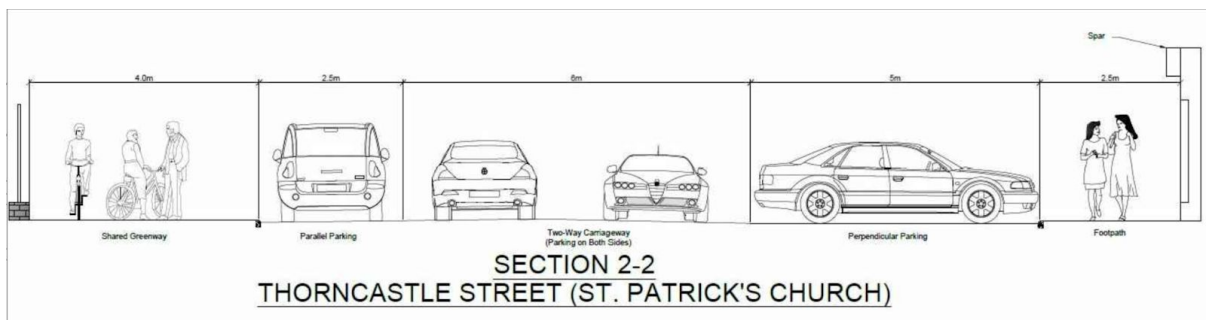
## SECTION 1-1 THORNCASTLE STREET (COMMUNITY CENTRE)

The three metre wide shared space for pedestrians and cyclists is unacceptable within a busy urban context and drops the quality-of-service far below A. Reallocating the space currently given to on-street car parking spaces to the greenway resolves this issue. There is ample on-street car parking in the area. A possible cross-section:



### 3.3 Thorncastle Street; Cross-section 2, Zone 2

At cross-section 2 another poor quality option is proposed while maintaining a huge amount of space for motor traffic. The NTA and the City Council need to reallocate road space to pedestrians and cyclists if they want to see modal-shift towards these sustainable modes. Emerging preferred route cross-section 2 below:



In this 20 metre cross section there is only 6.5 metres for sustainable transport. Potential solutions include removing the parallel on-street car parking. Or even changing the perpendicular parking to angled and reducing the width of the parallel parking from 2.5m to 2.1m, providing a buffer space between the parked cars and the cycle track as required by National Cycle Manual. Either option would provide enough space to create a 5 metre wide segregated greenway corridor for pedestrians and cyclists.

### 3.4 Bridge Crossings; Zones 2 and 3

Directness is one of the clear criteria for the 'needs' of cyclists, and yet the possibility of a direct route from Grand Canal Dock along the west bank of the Dodder all the way to Lansdowne Road Bridge does not appear to have been addressed, or was rejected for unknown reasons.

It is unclear, in the context of the preferred outlined routes as to why cyclists need to switch over and back with difficult manoeuvres within a relatively short distance, from Ringsend Village (Thorncastle St) to Lansdowne Road Bridge. Why are cyclists not accommodated for with pedestrians along the east side of the river or as in above paragraph on the west side? Both of these would provide a more direct route for cyclists. It would also remove major conflict points for cyclists crossing the bridges.

### 3.5 Zone 4

We welcome both the widening of the path to 5m and the widening of the underpass of the Irish Rail line. Given the 5m width the path should be segregated into 2 metres for pedestrians and 3 metres for cyclists (see section 2.3 above).

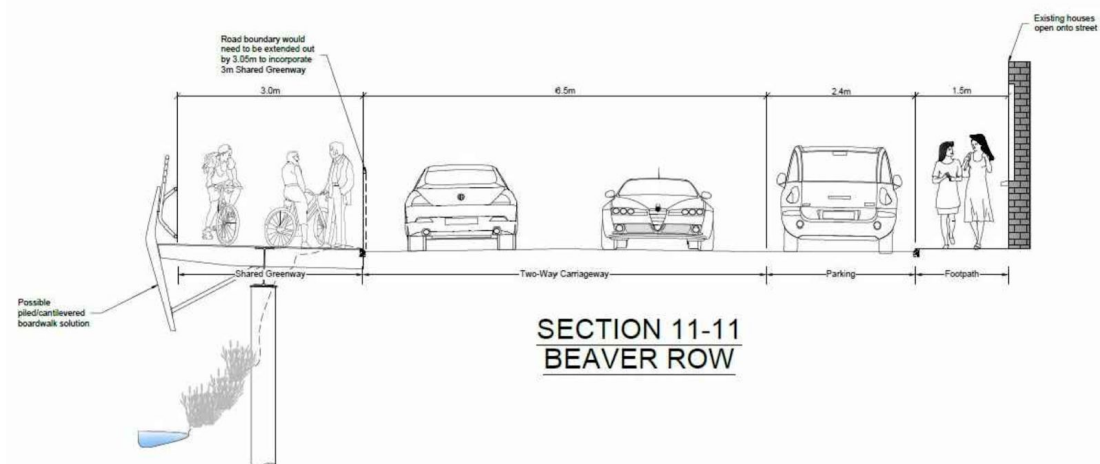
### 3.6 Beatty's Avenue; Zone 5

We recommend traffic reduction measures in this area. This will greatly increase safety for cyclists using this short-shared section in line with section 1.7.3 of the NTA's National Cycle Manual.

Beatty's Avenue is the only access to Herbert Cottages and Ballsbridge Avenue. The council should investigate measures for traffic reduction on Beatty's Avenue to make it more suitable for an integrated cycling environment suitable for all ages.

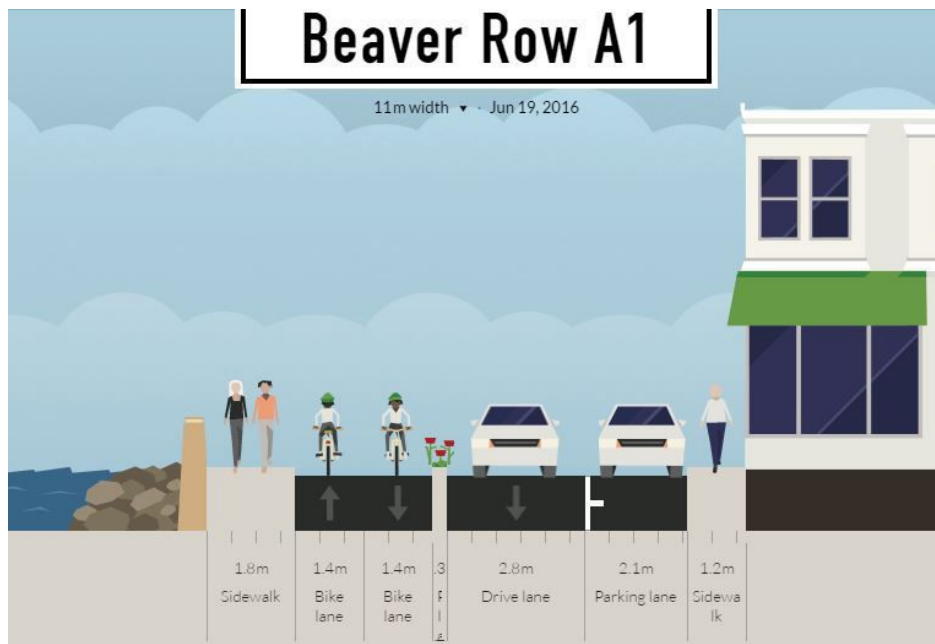
### 3.7 Environmental Impact; Zone 8 & 9

Both the emerging preferred route and alternative route in Zone 8 and Zone 9 will produce large environmental impacts on the river. This is against policies G115 and G116, and objective GIO18 of the Dublin City Development Plan. This is unnecessary. There are other alternatives in this area that should be examined first. We present two alternatives below.



Above is cross-section 11 from the alternative route along Beaver Row. There is no on-street car parking along this section of road currently. Not adding on-street car parking and reducing the two-way carriageway to 6 metres (inline with DMURS) means there is no need to install an expensive and environmentally destructive piled or cantilevered path along this stretch of the river bank.

If the council wishes to formalise the current illegal on-street/on-footpath car parking we recommend that Beaver Row be made one-way from Donnybrook Court to Beach Hill Avenue. This would provide the necessary space for the Dodder greenway and on-street parking for residents along this stretch without destroying the natural environment along the Dodder. A possible cross-section below, which involves no environmental impact and works within the existing road space:



In Zone 9, cross-section 13 includes a 7.7 metre wide two-way carriageway. This is far outside of the requirements for lane width laid out in DMURS (section 4.4.1), which is mandatory guidance. Maintaining a 7.7 metre carriageway here will only encourage speeding. This space can be reallocated to wider footpaths or a grass verge between the cycle track and the road.

### 3.8 Underpass of Churchtown Road; Zone 12

The 1.9 metre wide underpass of the Churchtown Road is too narrow and lowers the quality of service. It is a poor-quality option for pedestrians and cyclists. It is poorly lit, surrounded by foliage and suffers from poor sight lines. This will make the path unsafe after dark. Safe routes for cyclists is one of the five needs of cyclists laid out in section 1.2.1 of the National Cycle Manual.





Using this underpass also requires cyclists to drop elevation only to gain that elevation again on the other side. We recommend that the designer investigate other options along here. We don't feel the greenway route must hug the river's edge, widening the narrow walking trails along the river's edge that are full of character. Running the greenway parallel to Milltown Road for this section has many advantages: fewer elevation changes; less environmental impact; safer more visible route.

### 3.9 Environmental Impact; Zone 13

Again the emerging preferred route includes a large amount of unnecessary environmental impact. Re-allocating some of the existing public road width away from motor traffic could produce a high-quality greenway route for pedestrians and cyclists.

Cross-sections 15 and 16 show a 5m wide path piled into the hill side, which requires removing a large number of riverside trees and ecology. This will necessarily destroy the environment along here. Cross-section 15 shows a 7 metre wide carriageway. Cross-section 16 shows a 12.1 metre carriageway (and bus lay-by). Space can be reallocated here. This will dramatically reduce the need to widen the public space, destroying the river bank in the process. It is also likely a much cheaper solution. In locations a retaining wall might need to be installed to



gain an extra metre or two of effective width. There is no need to bulldoze a 5m wide path through the natural environment here.

### 3.10 Underpass of Orwell Road; Zone 14

This underpass is only 2.85m wide. It suffers from poor sight lines because of the loop back turn to access it. After dark this will be an unsafe route for pedestrians and cyclists. Safe routes for cyclists is one of the five needs of cyclists laid out in section 1.2.1 of the National Cycle Manual. Many female members of Dublin Cycling Campaign have said they would never go near the current underpass. Lighting alone will not resolve all concerns.



Alternative arrangements should be considered. Either a new safe underpass of the road should be constructed or a toucan crossing of the road should be provided. A new underpass is preferable as it removes a delay for cyclists, which provides good priority to both pedestrians and cyclists, and to motor traffic above.

### 3.11 Dodder Road Lower; Zone 14

There are no cross-sections provided for this stretch of the greenway. It appears that the greenway narrows to a 3 metre shared path. Again this is unacceptable for an urban greenway and provides low quality-of-service. It is too narrow and a shared space is unwanted. Dodder Road Lower has a wide carriageway. There is also a grass verge on the non-river side of the road. If necessary the road should be re-aligned to provide a 5 metre corridor for the greenway.

### 3.12 30km/h speed limits

The following roads need a 30km/h speed limit applied to them in order to support the safety of all users along greenway route:

- Zone 8, Beaver Row
- Zone 13, junction of Dodder Walk and Milltown Rd
- Zone 14, Orwell Walk

## 4.0 Conclusion

The emerging preferred and alternative routes presented during this public consultation are disappointing. The designs have attempted to squeeze pedestrians and cyclists into narrow shared spaces, which puts them into needless conflict. In many places space already exists within public carriageway that could be reallocated to pedestrians and cyclists. This will dramatically reduce the environmental impacts of the Dodder Greenway.

Our submission has delved into the details in places. However, it is important that the emerging preferred route includes the potential for a high-quality A route for cyclists. Many sections of the emerging preferred and alternative routes do not have this potential and need to be revisited.

Yours,

Kevin Baker  
Dublin Cycling Campaign

c/o Dublin Cycling Campaign,  
Tailor's Hall,  
Back Lane,  
Dublin 8

Registered Charity Number (RCN): 20102029