



Dublin Cycling Campaign,
% Tailor's Hall,
Back Lane,
Dublin 8

KELLYSTOWN SHD 308695

<http://www.pleanala.ie/casenum/308695.htm>

<https://www.kellystownshd.com>

13th December 2020

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 26 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 welcome Fingal County Council's intent to improve walking and cycling infrastructure on the Kellystown local area plan but we have some concerns with the road layout.

GENERAL COMMENTS

Overall Fingal Cycling Campaign welcomes this design and there are some nice cycling and walking features within the development. Although we do have specific concerns with planned road junction designs.

SPECIFIC COMMENTS

Slip Road

The slip road as shown in Image 1 is taken from the Engineering section of drawings **15038 P119A** as part of the proposed development located at the junction of Porterstown road, Diswellstown road and Dr Troy bridge. There are a number of reason why slip roads are no longer considered best practice

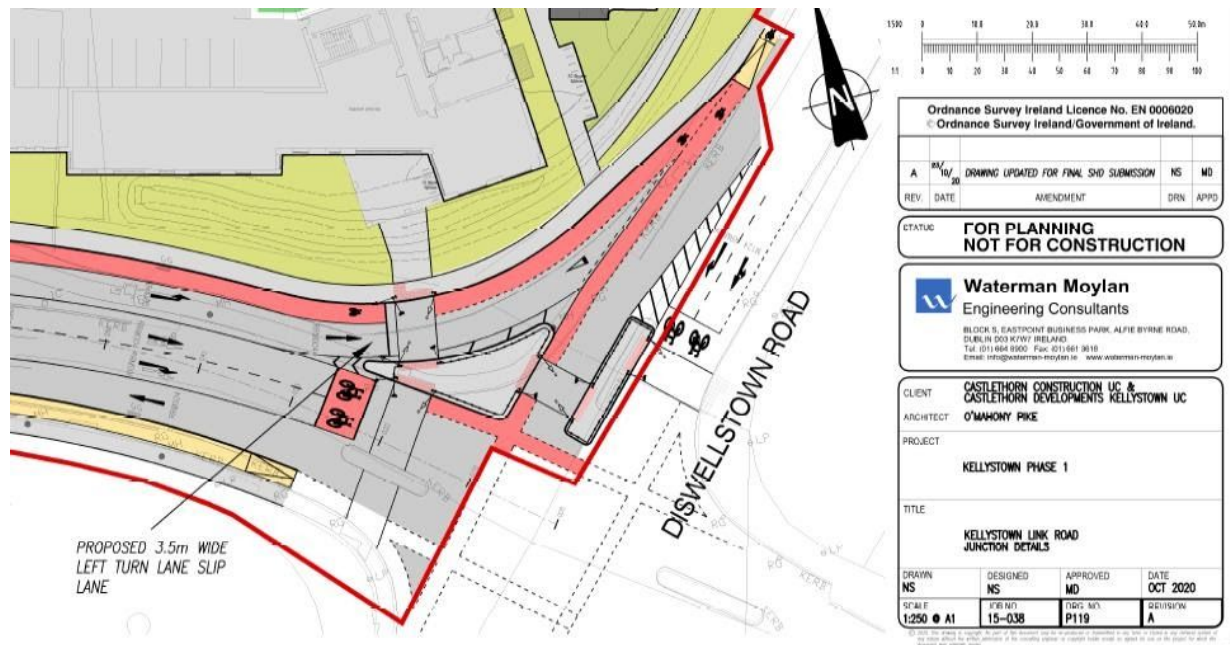


Image 1 : Taken from 15038 P119A Kellystown Link road

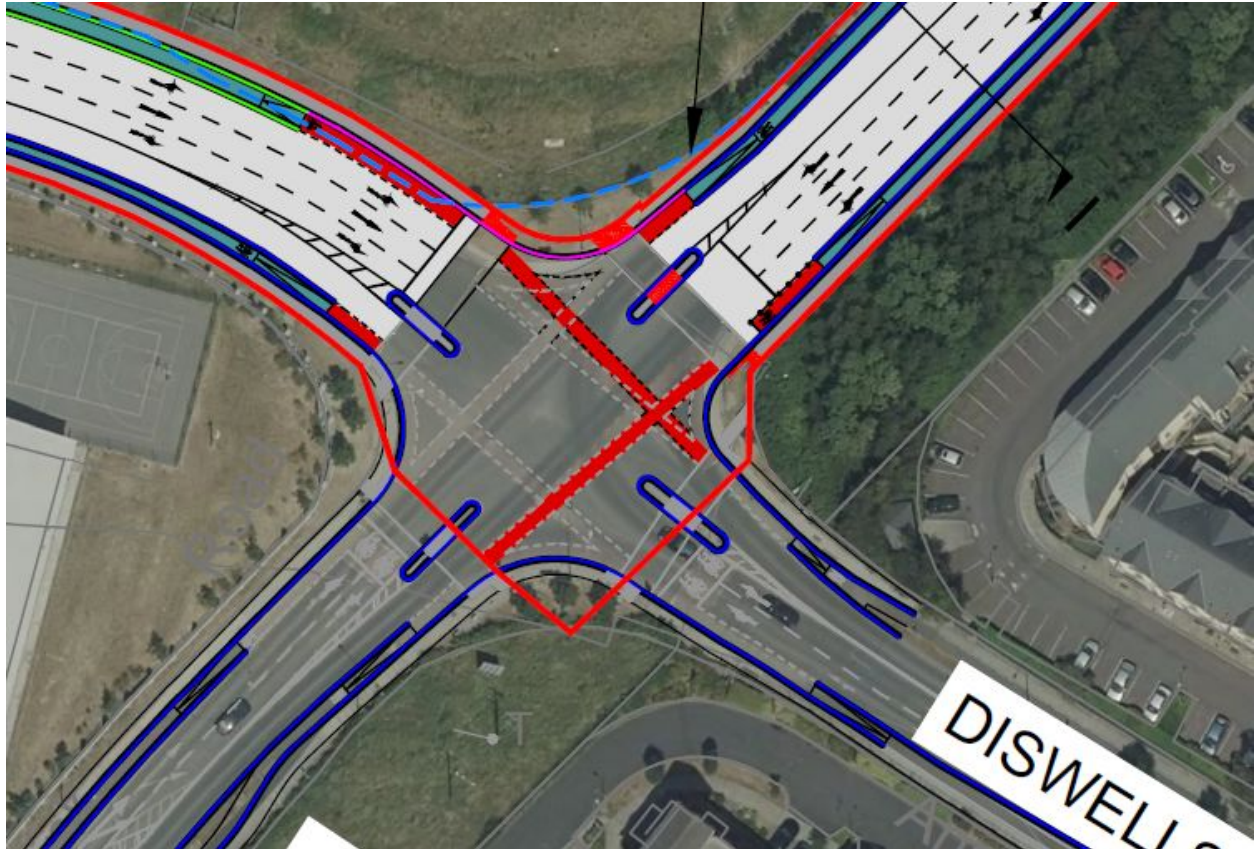


Image 2: Taken from Fingal County Council consultation portal on Kellystown road upgrade

- It would enable and encourage greater vehicle speed movements which are no longer considered best practice by the National Transport authority and are not referenced in the Design Manual for Urban Roads and Streets (DMURS).
- This location is situated beside 3 schools and is very busy with pedestrian and cycle movements in the mornings and evenings before and after school. This will increase the risk of death and injury to Vulnerable Road Users (VRU's) like pedestrians and cyclists.
- The designs do not reflect what Fingal County Council have put out to public consultation in November 2020 as shown in Image 2 taken from the councils consultation portal.

<https://consult.fingal.ie/en/consultation/kellystown-road-%E2%80%93-non-statutory-public-engagement> There is no slip lane featured in the councils plans for this junction.

- This design contradicts Fingal County Council's own development plan 2017-2023 Section 3.4 Sustainable Design and Standards APPENDIX I.
- The developers have referenced Fingal County councils development plan objectives in the Traffic and Transport assessment document page 4 to 5. These objectives go directly against the current design of having a slip road as part of the development. It diminishes the safety of cycling and walking, increases vehicle speed and risk to VRU's and doesn't align with what Fingal County Council have planned for their design road upgrade for Kellystown road;

2.1.4 Walking and Cycling

“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.”

“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 MT22: Improve pedestrian and cycle connectivity to stations and other public transport interchanges.”

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”. Kellystown Link Road (Kellystown Avenue) is included in the aforementioned Table 7.1 within the Plan.

- On page 6 of the Traffic and Transport assessment it refers to the objectives of the Local area plan for Kellystown that was written by Fingal County Council **2.2.1 Movement and Transport Objectives**

“Objective 7.1: *Ensure the streets and roads within the LAP are designed as per Design Manual for Urban Roads and Streets and the National Cycle Manual (NCM) to function as urban streets and to accommodate multimodal movements, create a sense of place and contribute to the public realm.”*

“Objective 7.21: *Upgrade the Diswellstown Road / Kellystown Link Road junction in Phase 1 of the development, to accommodate the forecast growth of traffic from Kellystown, support the delivery of reliable public transport services and facilitate the safe movement of pedestrians and cyclists.”*

This slip road design is not a design practice in DMURS or the NCM and is contradictory to Objectives 7.1 and 7.21 mentioned above.

- Waterman & Moylan have mentioned in page 13 of the Traffic and Transport assessment document about the current consultation of the Kellystown road upgrade by Fingal County Council. They fail to mention that the design does not align with the council's proposed plans. In these plans there will already be an additional left turning lane provided at this junction to facilitate movements onto the Dr Troy bridge;

4. Transportation Improvements 4.1 Roads and Junctions 4.1.1 Part 8
Kellystown Link Road currently on public display for consultation As part of the Fingal Development Plan 2017 – 2023 (FDP), the primary road improvement proposed in the surrounding area is the extension of the Kellystown Link Road further west towards R121 Clonsilla Road through the Kellystown Lands. The first phase of this road has been previously completed to serve the Porterstown Schools and the burial ground site and currently extends for some 260 metres to the west of the signalised junction with Diswellstown Road. As part of the ‘Part 8 Kellystown Link Road currently on public display for consultation’, the road improvements proposed along the site frontage include: - Construction of a single carriageway road with footpaths and pedestrian crossings points at convenient locations. - Construction of dedicated cycle lanes along both sides of the Kellystown Link Road. - Widening the existing portion of the road from the signalised junction with Diswellstown Road up until the proposed main site

entrance to accommodate an additional lane for eastbound traffic, which will operate as a left turning lane approaching the signalised junction with Diswellstown Road. - Provision of an additional left turning lane on the north-eastern approach of Kellystown Link Road/Diswellstown Road signalised junction. The road improvements proposed along the site frontage under the 'Part 8 Kellystown Link Road currently on public display for consultation' is illustrated in Figure 9 below – extracted from 'Public Engagement – Emerging Route Sheet 5 of 5 drawing' prepared by Clifton Scannell Emerson Associates (CSEA) in August 2020 on behalf of Fingal County Council. Figure 9 | Kellystown Link Road – Emerging Route extracted from CSEA Part 8 Drawing. Road – Emerging Route e

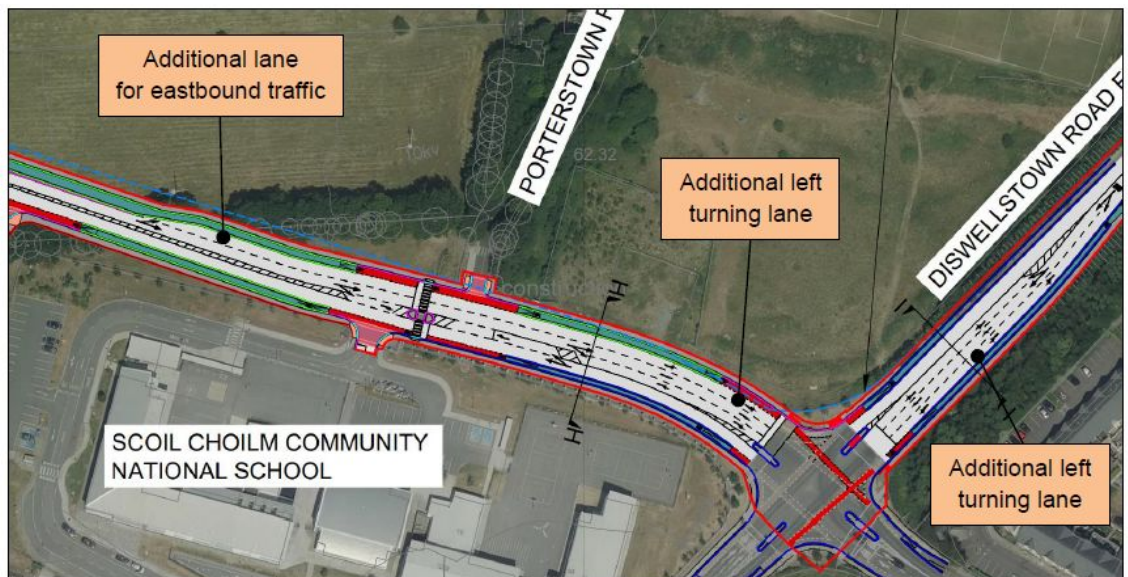


Figure 9 | Kellystown Link Road – Emerging Route extracted from CSEA Part 8 Drawing.

Image taken from Fingal County Council consultation page for Kellystown road upgrade Part 8 consultation

- As shown in Image 3 taken from the Traffic and Transport assessment from pages 52 and 53, the developers have mentioned that there are extra left turning lanes proposed in the current development plan by Fingal County Council for the Kellystown road upgrade. They are correct that there are proposed extra left turning lanes but they do not feature slip roads with a stand alone left turning lane and concrete islands increasing crossing times for pedestrians and cyclists. Image 2 shows what the council has proposed. The image shown by the developers fails to meet the standards and guidelines detailed in the Fingal County Council development plan, DMURS, National Cycle Manual and the National Transport Authority. Text taken from report:

- Based on that, an upgraded layout has been proposed for Junction 4. This upgraded layout, which is in line with the 'Part 8 Kellystown Link Road currently on public display for consultation', comprises two additional left turning lanes, one on the north-western approach to facilitate future vehicle movements from Kellystown LAP towards Blanchardstown and one on the north-eastern approach to provide easier access for those wishing to ingress the Diswellstown Road (E) by segregating them from the straight through traffic. Figure 29 illustrates the proposed upgraded junction

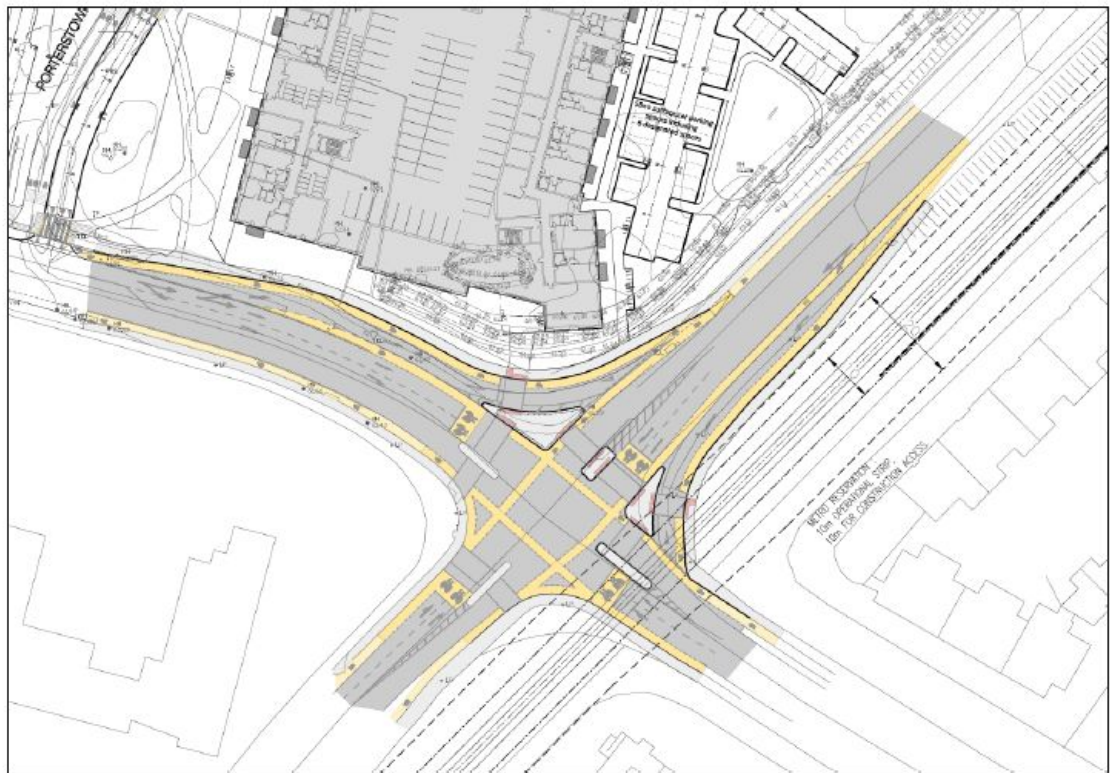


Figure 29 | Junction 4 – Upgraded Layout.

Image 3: Junction 4- Upgraded layout. Taken from Traffic and Transport assessment on Page 53

- On pages 52 and 53 of the Traffic and Transport assessment the developers put forward an argument for increased traffic movements to facilitate increased vehicle movements.

They have failed to mention the planned Dart+ West upgrade, at an advanced planning stage, that is currently underway and modal shift with Fingal County Council providing better cycling and walking infrastructure to get people out of their cars. In light of COVID-19 work patterns will have changed since the designs with most people having some form of working from home practice built into their week in a post COVID-19 scenario.

Connectivity- Pedestrians perspective

Image 4 was taken from page 20 of DMURS. On the lower right hand side of the image you can see an example is given of a slip road very similar to what is envisaged by the plans for this development and in the DMURS document it states that it minimises vehicles times but increases crossing times for pedestrians.

Connectivity and legibility issues also occur at a more localised scale where the movement of traffic is given priority over that of pedestrians. Pedestrians often have to walk long distances to designated crossing points. Larger junctions can also be difficult to navigate and significantly delay journey times. Many large junctions corral pedestrian movement (and in some cases cyclists) away from desire lines, using guardrails, increasing the amount of time it takes to cross as users navigate a number of individually signalised crossings (see Figure 2.8).

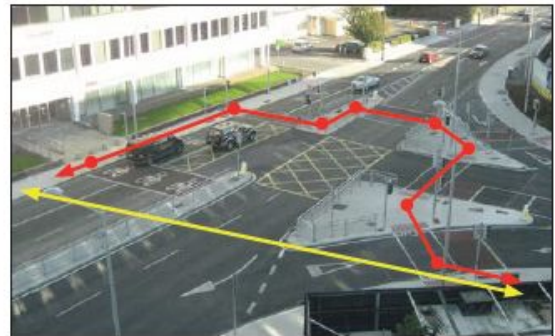
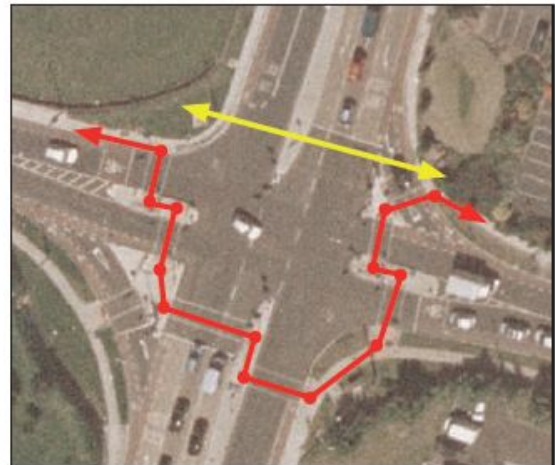


Figure 2.8: Examples of a junctions designed to minimise vehicle delays which significantly increase crossing times for pedestrians. Pedestrian desire lines (represented by the yellow line) are diverted through a series of separate crossings (represented by the red line). The top example can take pedestrians as long as 5 minutes to navigate.

CYCLE LANE ALONG PORTERSTOWN ROAD

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. Image 6 was taken from **1506A-OMP-00-SP-DR-A-1000**. 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.

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."

Transport Infrastructure Ireland (TII) also recommends 3.0 meter minimum widths on shared spaces on greenway routes. See Image 5 showing Table 4.1 : Range of Mandatory widths for

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

cycle facilities.

Image 5: Table 4.1 from TII Rural Cycle Scheme Design (including Amendment No. 1, dated December 2014)



Image 6: Taken from 1506A-OMP-00-SP-DR-A-1000

BICYCLE PARKING

We welcome the mention of specific guidelines in the design standards for bicycle parking in document **1506A-OMP-XX-XX-PP-A-9016_DesignStatement_Page51-60**. Although it does mention a variety of cycle racks will be used it is unclear where the different types will be placed in the development. Are they Sheffield and two tier style racks? As referenced in the design statement with bicycle parking spaces are provided, in compliance with the Sustainable Urban Housing: Design Standards for New Apartments 2018. A mixture of Sheffield Stands and

stacked spaces are provided. On page 25 of the Sustainable Urban Housing: Design Standards for New Apartments 2018 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. It also references Dublin Cycling Campaigns bicycle parking guidance document.

Planning authorities should ensure that development proposals incorporate details on the provision of and access to cycle storage facilities at 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).

From the designs of the ground floor bicycle parking in Block A it is shown in document **1506A-OMP-BA-00-DR-A-1000_BlockA_Level00** and Image 7 below. it is unclear if the two tier style parking is gas assisted as recommended in the guidance document from Dublin Cycling Campaign referenced in the Sustainable Urban Housing: Design Standards for New Apartments 2018. In Image 7 the two tier parking stands can be difficult to use for some people if they have to lift the weight of the bike above head height without a gas assisted device connected to the bike rack.

Are the visitor bicycle parking spaces protected against the weather? It is not clear from the designs if they are.

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.

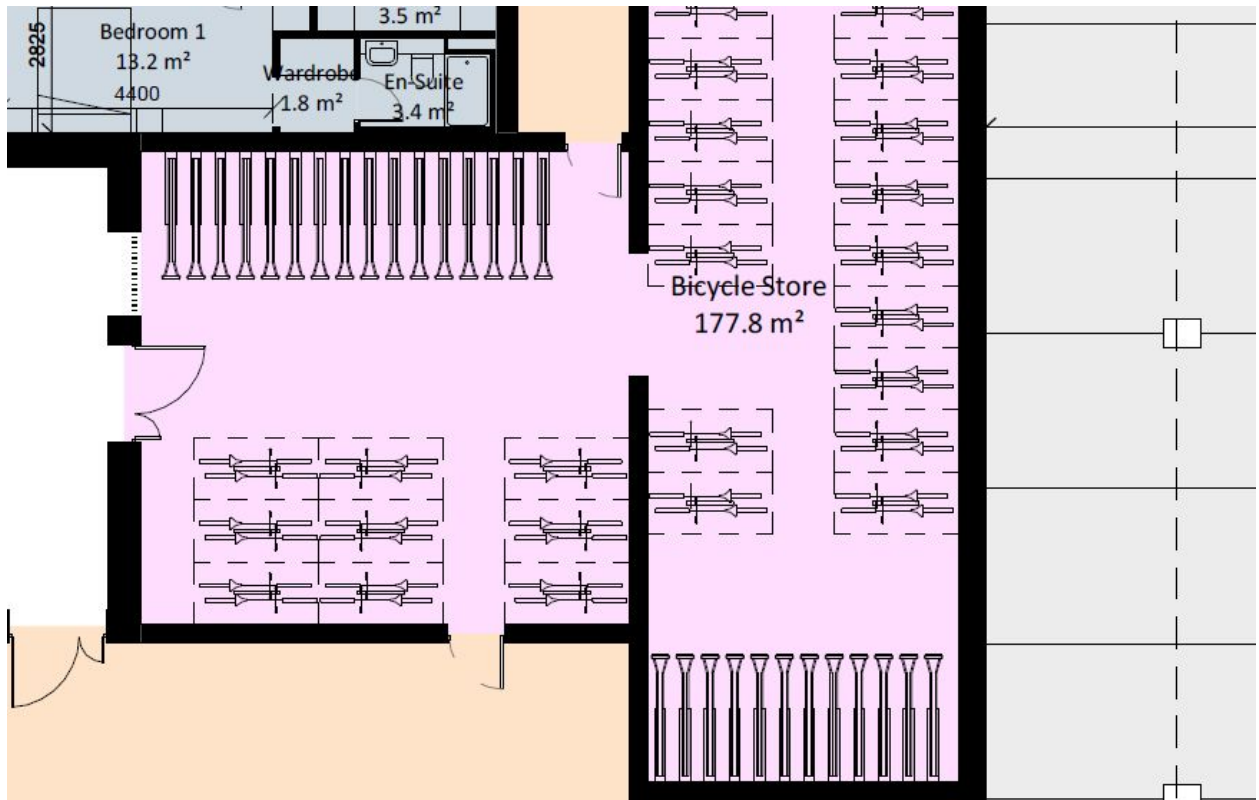


Image 7: Taken from 1506A-OMP-BA-00-DR-A-1000_BlockA_Level00

CONCLUSION

Fingal Cycling Campaign welcomes the opportunity to comment on the Kellystown 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 Block A. 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. The newly proposed junction at the Diswellstown road goes against the proposed plans by Fingal County Council, DMURS, National Cycle Manual and the National Transport Authority. The slip road 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

Dr Paul Corcoran

Fingal Cycling Campaign

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APPENDIX I

Fingal Development Plan 2017- 2023

Section 3.4 Sustainable Design and Standards

- **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.

- **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.