

DUBLIN CYCLING CAMPAIGN

FINGAL CYCLING

Public Consultation on the Part VIII – Harry Reynolds Road Pedestrian and Cycle Route August 2020



Context

We are writing to you on behalf of Fingal Cycling Campaign a subgroup of Dublin Cycling Campaign advocacy group for Dublin for 26 years and a registered charity #20102029. Dublin Cycling Campaign is a member of Cyclist.ie ([ww.cyclist.ie](http://www.cyclist.ie)), the Irish Cycling Advocacy Network, 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). We want to make Dublin a safe and friendly place for everyone, of all ages, to cycle and walk. Harry Reynolds was the first Irishman to win the cycling world championships. Also named as the Balbriggan flyer.

Summary

Dublin Cycling Campaign are supportive of projects where walking and cycling are placed at the top of the transport hierarchy. Unfortunately, though there are many positive aspects to this design, we **cannot support** this project in its current format. We would ask once again that the Council and designers meet with us to go through the many flawed issues arising in the proposed design. Disappointingly, this lack of vision is borne out in the design. Junctions remain dangerous and uninviting for cyclists and the small amount of segregation offered by this scheme disappears at conflict points where it is needed the most. We, like Fingal County Council, would like to encourage less experienced and more vulnerable cyclists to take to their bikes. The proposed changes in this design will not do this. Protecting people cycling at pinch points in particular, should be a given, but the proposed design at the many roundabouts makes people cycling vulnerable to encroaching drivers.

In the introduction of this consultation it mentions speed limits to 50 km/h throughout. This needs to be reconsidered in light of Dublin City Council plans to reduce speed limits across the city to 30 Kmph. A cyclist hit at 50 Kmph only has a 50:50 chance of survival.

1.0 General Comments

1.1 Speed Limits

We note that the proposed route will link various community facilities, and we note from the designer's responses in the 'Public Engagement Report', that it is proposed to reduce certain speed limits, in general to 50kph. But these are not indicated on the accompanying drawings, although they should be. We still maintain that, due to the density of housing estates the route passes through, the consideration of introducing a 30kph speed limit along the route overall, or at the very least on certain sections, should be examined and clearly indicated. The present outlined design is incomplete in this regard.

1.1 Shared Space Design

The proposed designs incorporate high levels of shared space (pedestrians and cyclists) design at a number of locations. This is not acceptable in the context of this scheme, despite the introduction of zebra crossings, which prioritise pedestrians at roundabouts, but leave cyclists in a legal limbo, unless they dismount and walk across these crossings, as suggested in the . The National Cycle Manual (cyclemanual.ie) is quite clear on the use of shared space and states as follows in Section 1.9.3

'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.'

Though the designers state in the 'Public Engagement Report' that the design of the shared spaces are acceptable and in line with recommendations of the National Cycle Manual(NCM), they do not reference the relevant section(s) of the NCM. And, once again the NCM states in Sect. 1.9.3 that shared space should only be considered *'Where shared facilities cannot be avoided'*. We maintain that there are other options available at the various locations where shared space is proposed. In their response the designers have referenced Section 4.8.4 of the NCM dealing with roundabouts in relation to shared space. Shared space in the context of roundabouts in the NCM refers to cyclists sharing with traffic, not cyclists with pedestrians! This is a misinterpretation by the designers.

These shared space designs need to be revisited and the Council must either fully justify the choice of using shared design or raise the quality of the design to meet the standards required.

1.3 Roundabouts

Dublin Cycling Campaign do not consider roundabouts in general to be conducive to supporting increased cycling use. Cyclists do not like them as they tend to divert cyclists away from the main traffic flow, and in the case of the designs on this project, diverting them through a slow crossing process for

each arm of the junction, in particular when making a right turn. The proposed design for these roundabouts will:

- Increase conflict between pedestrians and cyclists
- Leave cyclists in a legal limbo as zebra crossings are not legally usable by cyclists unless they actively dismount
- Not provide any direct straight-through route for regular seasoned cyclists.
- Make any right turn manoeuvres for cyclists particularly complex and slow.

There is a need to recognise that some cyclists will want to cross directly in the roundabout, rather than mix with pedestrians. This needs to be facilitated. Until zebra crossings can legally be used by cyclists, this form of roundabout design is of a poor standard.

The national cycle manual is due to be updated and a number of options for cycle and pedestrian friendly roundabouts will undoubtedly be considered in that update. In the meantime a localised version of the [Cyclops](#) junction, as employed in the UK and other jurisdictions, might have been better utilised for the roundabouts on this route.

1.4 Zebra Crossings

We are delighted to see the proposals include a number of zebra crossings, at various locations, which will give priority to pedestrians over motor traffic. The use of zebra crossings was discontinued in many areas over recent years, but have a potentially important role in increasing the safety of vulnerable road users, and in reversing the priority given to motor traffic over pedestrians. However, as stated above in 1.3 legal access by cyclists needs to be available. A scheme that asks cyclists to dismount at junctions, cannot be classified as a cycle friendly scheme.

1.5 Flashing Amber Priority

We note the proposal for flashing amber priority for cyclists at the Chapel St/Harry St and are delighted to see this option, but are disappointed that the details of this proposal are not available at this stage

1.6 Raised Tables

We are delighted to see the widespread use of Raised Tables at many of the junctions, which helps to regulate and slow traffic, and provide greater safety for pedestrians and cyclists.

1.7 Permeability

We fail to understand why the important issue of permeability for pedestrians and cyclists from nearby housing estates, at present blocked by major boundary walls, cannot be addressed, as part of this scheme. Rather than being addressed separately, as indicated in the 'Public Engagement Report', this should be dealt with within this proposed scheme, and not put on the long finger. This particularly applies to the Westbrook and Chapel housing estates.

1.8 Trees

While a number of young trees are proposed to be uprooted and moved as part of this scheme we are delighted to see the sensitive and green approach to their replacement but ideally for them to be kept judging from the large number of submissions from the local community. Can the trees be kept or maintained with an altered design? We welcome the introduction of 347 linear meters of native hedgerow but I think this point has been missed by the public judging from the submissions.

Specific comments

Layout Drawing 1:

It is very concerning that the first layout drawing show's shared space along a housing estate when there is ample space for a fully segregated route along this section. Have Atkins considered this as an option?

Cyclists have to negotiate with motor vehicles exiting and entering Barons hall grove and Barons hall. These entry and exit points will be dangerous conflict points for cyclists travelling straight along the road. Low speed limits alone will not provide safe cycling conditions for all ages and abilities.

Cyclists travelling along Barons hall grove will also have to contend with cars reversing out of parked spaces and also oncoming traffic (See Image 1). This is not an optimum design



Image 1: Car parking section in shared space for cyclists.

Layout Drawing 2 :

Cyclists travelling approaching the roundabout, e.g. from the East, who wish to continue straight on, seem to be obliged to enter “**shared space**”, turn left, cross a Zebra Crossing to their right while dismounting their bikes, keep right to reach a second Zebra Crossing once again dismounting their bikes, before reaching the road they want to continue on?

This is unacceptable for two reasons. First, sharing space with pedestrians is a classic danger for both cyclists and pedestrians. Try to imagine commuting cyclists approaching this set-up at 18 kmph. Secondly, carry on straight through the roundabout is rendered tortuous for the cyclist who should be permitted to traverse the roundabout **on the roundabout**. There are two solutions to making this safer for cyclists and drivers.

The ideal solution is found in a [Cyclops](#) junction where the cycle track encircles the roundabout, with corner buffers, and crosses the exits on raised speed cushions with right-of-way given to the cyclists crossing the exit. Cyclists are thus not forced to ride a distance away to the left from the roundabout in order to continue on straight. Drivers do have a slightly shorter circular distance to travel but this difference is negligible and is worthwhile for cyclists who are protected by the buffers and right-of-way.

A less ideal alternative for small or existing roundabouts is to **convert the cycle track track to an on-road cycle lane approaching the roundabout**, thus allowing cyclists to use the roundabout directly in the main stream of traffic in order to continue straight on. This latter solution can be made safer if the angle of entry of the road into the roundabout was less splayed so as to slow motorised traffic speed entering the roundabout. Roundabout design where entrances and exits are splayed i.e. at a low angle, derive from the obsession to get traffic at speed through the roundabout. In urban areas with cycle traffic, this obsession puts cyclists at risk and deters the development of cycling traffic which, if facilitated, would *reduce* traffic congestion.

One notable good feature of this drawing is that cyclists heading East from the roundabout on the cycle track go past the side road **with right-of-way**, with traffic on the side road held back by the Stop sign behind the raised table. This seemingly simple arrangement is vital to eliminating a common defect in cycle track design which leads to collisions at such junctions if drivers are not clearly instructed to yield right-of-way by ramp and signage.

Hampton Woods/Harry Reynolds Road Junction (Drg 2)

We recommend the protection of the eastbound cycle lane at the approach to this junction, to dissuade left turning vehicles from cutting across cyclists.

Layout Drawing 3

A key positive element of the overall design of the cycle infrastructure in this scheme is illustrated in this drawing, namely, that the cycle tracks are physically segregated by height from both road and adjoining footpath and have good width (2metres). FCC will hopefully insist on this feature in future cycle infrastructure plans.

However, the “shared space” etc problem alluded to above for Layout Drawing 2 is even more pronounced in this drawing. Regular Cyclists approaching the roundabout must also be facilitated to enter the road, on a cycle *lane* initially, so as to negotiate the roundabout directly either Dutch-style or with the backing of slow traffic entry into the roundabout if it is small (as described above for Layout Diagram 2).

If there are a high number of pedestrians accessing the roundabout from Ashfield Drive a cyclist will take the more direct route and go onto the main road with vehicle traffic. The Harry Reynolds road approaching the roundabout from the south is a long straight section of road and even though a new zebra crossing will be installed, negotiating the roundabout from a stopped position will make it dangerous.

Layout Drawing 4 :

Harry Reynolds/Drogheda St

While the proposals shown are an improvement at this junction they are not of the required standard. We are unhappy with the level of shared space at this junction, although we welcome clarification on the 2 way cycle routes on both sides of Drogheda St. We also recommend the protection of the cycle lanes on the approaches to the various junctions along this stretch, to dissuade left turning vehicles from cutting sharply across cyclists. In this case cyclists, drivers and pedestrians negotiate a T-junction. Again however, the cyclists and pedestrians are unnecessarily obliged to share space at the junction. The solution is to convert the cycle track to a cycle lane approaching the junction, allowing the cyclists to turn left, on the road, or turn right, crossing the junction as motor traffic does.

Layout Drawing 5:

Harry Reynolds Road alongside Chapel & Westbrook Housing Estates

As mentioned above in 1.6 we are disappointed that the opportunity to increase permeability between these housing estates and the Harry Reynolds Road, has not been availed of on this scheme. With the improvements proposed in the cycling and walking infrastructure, the potential to break through the forbidding walls into these estates to enable easier access on foot or by bicycle to the new infrastructure should have been availed of. We would also recommend consideration of some form of 'softening' of the forbidding estate walls along the route, possibly through the introduction of murals, as a number of young saplings are proposed to be lost along this section.

We welcome the raised table for pedestrians but how does a cyclist negotiate these junctions.



Image 2: Shared cycle path beside raised table for pedestrians

Layout Drawing 6 :

At the Chapel St. junction, the northbound cycle lane across the junction on Harry Reynolds Road sends cyclists onto the footpath instead of the road? Positive features are "segregated islands" and the proposed flashing amber lights for cyclists. But we would wish to see detailed plans for the flashing amber proposals.

The design of the junction mentions new cycle islands to protect cyclists from vehicle traffic. It's not clear from the image where these Islands will be installed. From layout drawing 6 it looks like it will be just painted lines across the junction. Are they painted islands or Kerbs? It is not clear from the drawing. The junction is not segregated and will not be safe for all ages and abilities. This does nothing to improve cycling safety especially at a busy junction like this. There is ample space to provide fully segregated

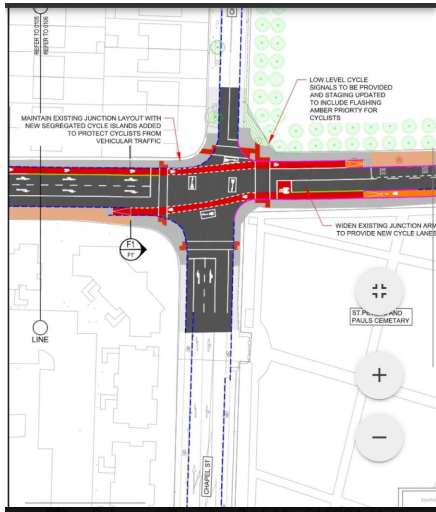


Image 3: Chapel street and Harry Reynolds junction. Taken from Layout drawing 6.

As shown in Image 5, is an example taken from the revised design due to Dublin Cycling Campaigns recommendation of kerb protected junction along the North stand/Amien street road. It is clear from the image where the kerb protected locations are and prevent left hooks on cyclists from vehicles turning left.



Image 4: Kerb protected infrastructure for North strand road/Amien street

<https://www.dublincycling.com/cycling/improved-design-emerges-fairview-cycle-route>

Another example of a protected junction is the design for Fitzwilliam square in Dublin city center. One of the key parts of this design is that a turning vehicle and a straight moving cyclist meet at a right angle. This provides good line-of-sight between the cyclist and the driver.



Image 5: Kerb protected junction

We recommend that the design team check out www.protectedintersection.com, which is a website from a US transport planner about how to adapt the Dutch protected corner junction and the principles behind protected corner junction designs.

Clonard Street Junction

We are unclear as to why no cycling provision is proposed on the Clonard Street accesses to Harry Reynolds. This needs to be considered both for cyclists turning into and off Harry Reynolds. This was raised in our earlier December 2019 submission but no response was given in the Public Consultation Report.

We also recommend the protection of the cycle lanes on the approaches to this junction, to dissuade left turning vehicles from cutting sharply across cyclists.

Layout Drawing 7:

We recommend the protection of the cycle lanes on the approaches to the junctions on this stretch, to dissuade left turning vehicles from cutting sharply across cyclists.

We note also the proposal on Drg 7 to include what appears to be a ramp along this stretch. Is this an indication that high speeds are expected? Have other methods of slowing the main road traffic been considered?

Layout Drawing 8:

The side road beside AIB bank looks like they have sweeping radii which will increase motor vehicle speed at a very vulnerable location for cyclists. This is against National Cycle manual guidance.

Layout Drawing 9:

The National Cycle manual reference to roundabouts:

“Roundabouts can work well for cyclists and pedestrians but only if designed to specifically address their needs and expectations. Safety, and not capacity, is the over-riding principle for good roundabout design.”

There is ample space for provide a fully segregated cycle lane along the roundabout as mentioned earlier. *Shared space at this busy location doesn't serve pedestrians or cyclists and increases the risk of conflicts.*

We remain unhappy with the overall redesign of this junction, which includes extensive shared space use, and wide angle entrances to the roundabout for vehicles, encouraging fast vehicle speeds. It diverts straight ahead and right turning cyclists on long diversions. This junction is an ideal consideration for the development of a [Cyclops](#) style junction design, which provides a win-win situation for all traffic.

Layout Drawing 10 :

The commendable effort being made by FCC to provide two-way cycle tracks in this scheme is noted.

The cycle tracks coming from the East, from Castlelands, terminate in shared space at the roundabout. See comments for Layout Drawing 2 above. Once again we recommend the removal of shared space

areas. In particular along this stretch there is plenty of width to play with, and no excuse for not providing continuous segregated cycle tracks.

Proposed Skate Park

Park cycle routes are always welcome, and the fact that the proposed park routes link into housing and the busy shopping areas is to be welcomed.

Summary/Conclusion

The Fingal Branch of Dublin Cycling campaign wants to see the use of high quality design principles that are a living example of cycle priority design, as exemplified by recent design proposals in Dublin City. Our view of this proposed scheme is that, if constructed as presently proposed, it is an opportunity lost. There are major opportunities for improvement in the design of this relatively short section of important cycling infrastructure.

The current design does not adhere to the 5 basic principles of best practice for cycling infrastructure, safety, directness, coherence of accessibility, attractiveness and comfort.

We propose that this scheme be reviewed in full once again in consideration of the various points raised above and in consideration of an updated national cycle manual that is under review and new recommendations that are soon to be issued. We in the Fingal branch of Dublin Cycling Campaign, are happy to meet with officials and the designers at any stage to discuss any of the proposals and criticisms made above.

I would appreciate acknowledgement of receipt of this submission.

Yours

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