



Case Number: 306102; 512 no. apartments. Former Techrete Site, Beshoff Motors, Garden Centre, Howth Road, Howth, Dublin 13.

1.0 Introduction

Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. We have a vision for Dublin where large numbers of people of all ages and abilities choose to cycle because it is safe and comfortable.

Our comments on this application are limited to the walking and cycling facilities as part of this development.

2.0 Cycle Facilities Along Howth Road

The proposed development site is adjacent to the Howth Road. The 'Site Layout Plan' drawing shows that the application includes the public road outside the development, with a letter of consent from Fingal County Council.

The Howth Road is secondary route 1A in the NTA's *Greater Dublin Area Cycle Network Plan*.

The Fingal County Development Plan states the following objectives:

MT02: Support the recommendations of the National Transport Authority's Transport Strategy for the Greater Dublin Area 2016-2035 to facilitate the future sustainable growth of Fingal.

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.

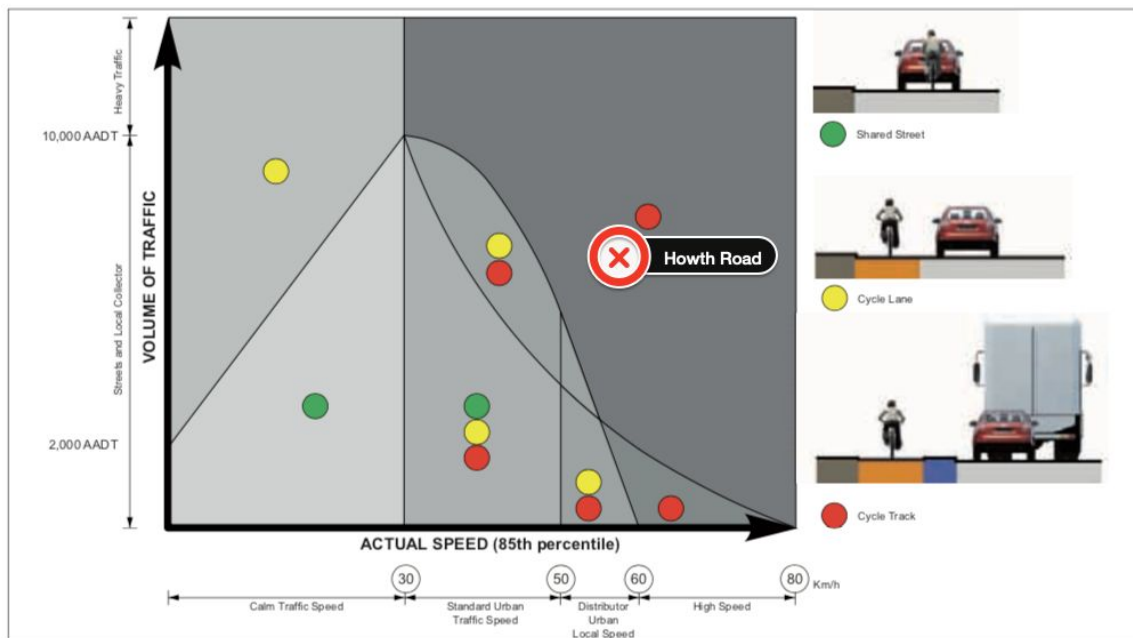
MT14: The Council will work in cooperation with the NTA and adjoining Local Authorities to implement the Greater Dublin Area Cycle Network Plan subject to detailed engineering design and the mitigation measures presented in the SEA and Natura Impact Statement accompanying the NTA Plan.

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.

By analysing the context of Howth Road we can use the NTA's *National Cycle Manual* to determine the type of cycle facilities necessary to deliver secondary route 1A of the cycle network plan.

Howth Road has a speed limit of 60km/h, so it is safe to assume that 85th percentile speeds on the Howth Road are above 50km/h. The submitted *Traffic and Transportation Assessment* shows that existing traffic levels on the Howth Road are in the range of 7,500-8,000 AADT. According to section 1.7.4 of the NTA's *National Cycle Manual* the necessary level of segregation needed to enable and encourage people to cycle safely and comfortably is a curb separated cycle track.

1.7.4 Guidance Graph



Annotated extract of the National Cycle Manual (page 19)

The proposed redesigned Howth Road does not include any dedicated cycle facilities (engineering drawings 'Proposed Road Layout').

We ask the planning authority to attach a condition that alters the proposed redesign of Howth Road to include the cycle facilities needed to deliver secondary route 1A of the GDA Cycle Network Plan within the NTA's National Cycle Manual guidance. This will in turn accomplish the objectives of the GDA Transport Strategy and the Fingal County Council Development Plan.

3.0 Vehicle Entrances to Development

The vehicle entrances to the development's underground car parks are over sized and offer no pedestrian priority. This increases the crossing distances for pedestrians and can leave people cycling more vulnerable to side-swipe collisions.

The proposed entrances also do not indicate that pedestrians have priority over vehicles entering and exiting the development. Altering the design to include a continuous footpath across the entrances to improve pedestrian priority and safety.

The engineering drawings 'Proposed Road Layout' show that the corner radii on the two proposed entrances are 6.5m. Section 4.3.3 of DMURS states:

In general, on junctions between Arterial and/or Link streets a maximum corner radii of 6m should be applied.

The proposed 6.5m corner radii are overly large for the entrance to an underground car park. This is particularly true for the entrance to Block A, which has 6.5m corner radii, but no loading area and extremely infrequent use by heavy vehicles.

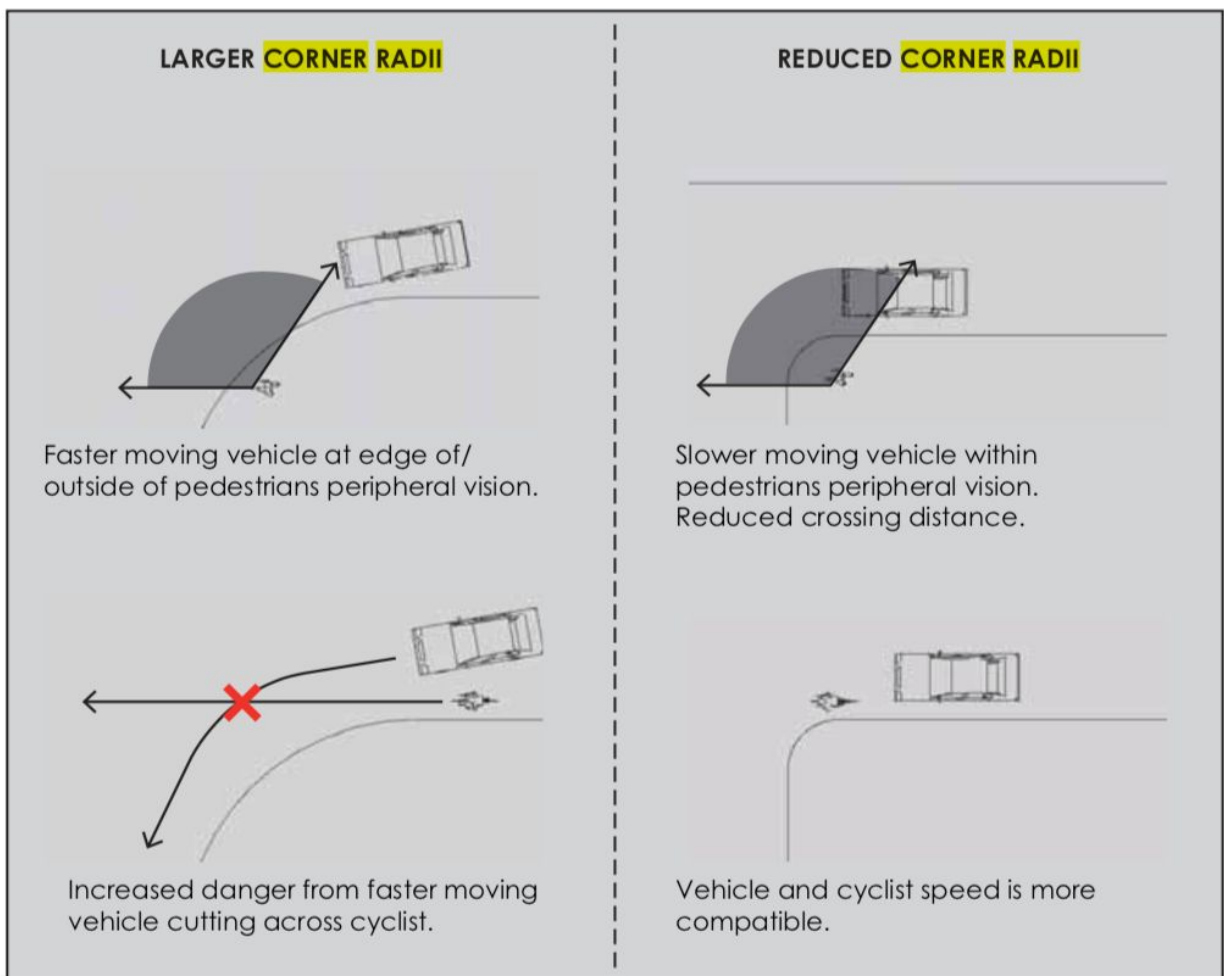


Figure 4.42: Illustration of the benefits of reduced corner radii on pedestrian and cyclist safety (images based on Figures 6.3 and 6.15 of the UK Manual for Streets (2007)).

If the planning authority deems to grant permission we request that a condition be attached to reduce the size of the two underground car park entrances in order to reduce the traffic hazard for people walking and cycling.

5.0 Conclusion

In our opinion this development needs to address a number of outstanding traffic hazard issues for people walking and cycling:

1. The lack of necessary dedicated cycle facilities along the redesigned Howth Road that is part of this planning application
2. The overly large car park entrances that do not comply with best practices of DMURS

Kevin Baker,
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