



Dublin Cycling Campaign,

% Tailor's Hall,

Back Lane,

Dublin 8

22 June 2020

Planning reference: Randelswood Holdings Ltd., Strategic housing development at lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20
<https://www.palmerstownshd2.ie/>

To whom it may concern

We are writing to you on behalf of Dublin Cycling Campaign a cycling advocacy group for Dublin for 26 years and a registered charity #20102029.

Dublin Cycling Campaign welcomes this new development and its emphasis on pedestrian and cycling priority. I have a number of observations regarding the design of the bicycle parking and the safety of the main entry and exit point to the development.

1.0 VEHICLE ENTRANCE TO THE 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 in Figure 4.42 '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 7.5m corner radii are overly large for the entrance to an underground car park.

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.

It is mentioned in the Traffic and Transport assessment, page 51 section 6.3.5 under heading Cyclists

'The National Cycle Manual (2011) (NCM) promote cycling as a sustainable form of transport and seek to rebalance design priorities to promote a safer and more comfortable environment for cyclists. To achieve these goals, the NCM recognises the importance of slowing vehicular traffic within cities, towns and villages, and advocates many of the measures contained within this Manual, such as narrower vehicular carriageways and tighter corner radii.' DMURS goes on to state: 'On lightly-trafficked/low-speed streets, designers are generally directed to create Shared Streets where cyclists and motor vehicles share the carriageway'. As previously outlined, the proposed corner radii at the site access junction on Kennelsfort Road complies with DMURS (Section 4.3.3) in order to reduce vehicular speeds. Furthermore the development proposes a shared pedestrian/cycle route through the site.'

In the traffic and assessment report the document mentions that they are in adherence to Design manual for urban roads and streets - DMURS, there is a discrepancy on the radii mentioned in the plans and those that are referenced in DMURS in order to protect cyclists and pedestrians. Can this be clarified. We recommend smaller radii in order to slow traffic especially that traffic will be turning off a major road. It is also unclear from the designs where the "proposed cycling and pedestrian route is located and there are no clear images of this shown in the planning application.

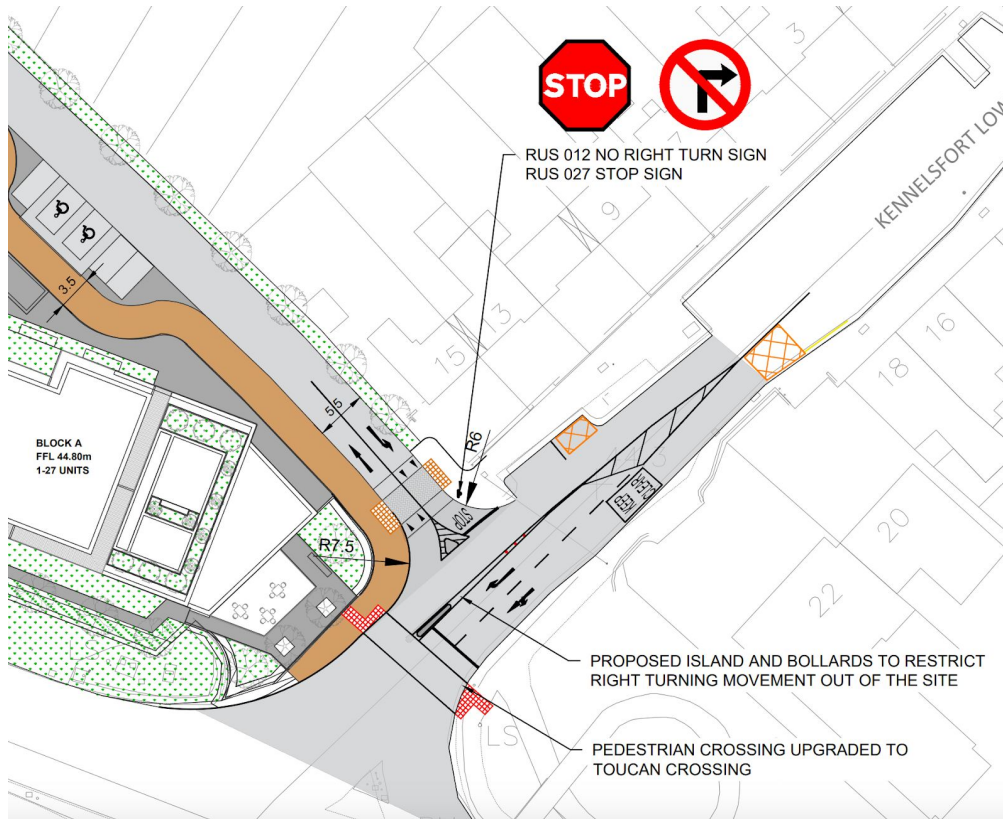


Image taken from page 26 from Traffic & Transport assessment section
*Figure 3.2 – Proposed Site Access onto Kennelsfort Road (AECOM Drawing:
 PR224738-ACM-00-00-DR-CE00-0001)*

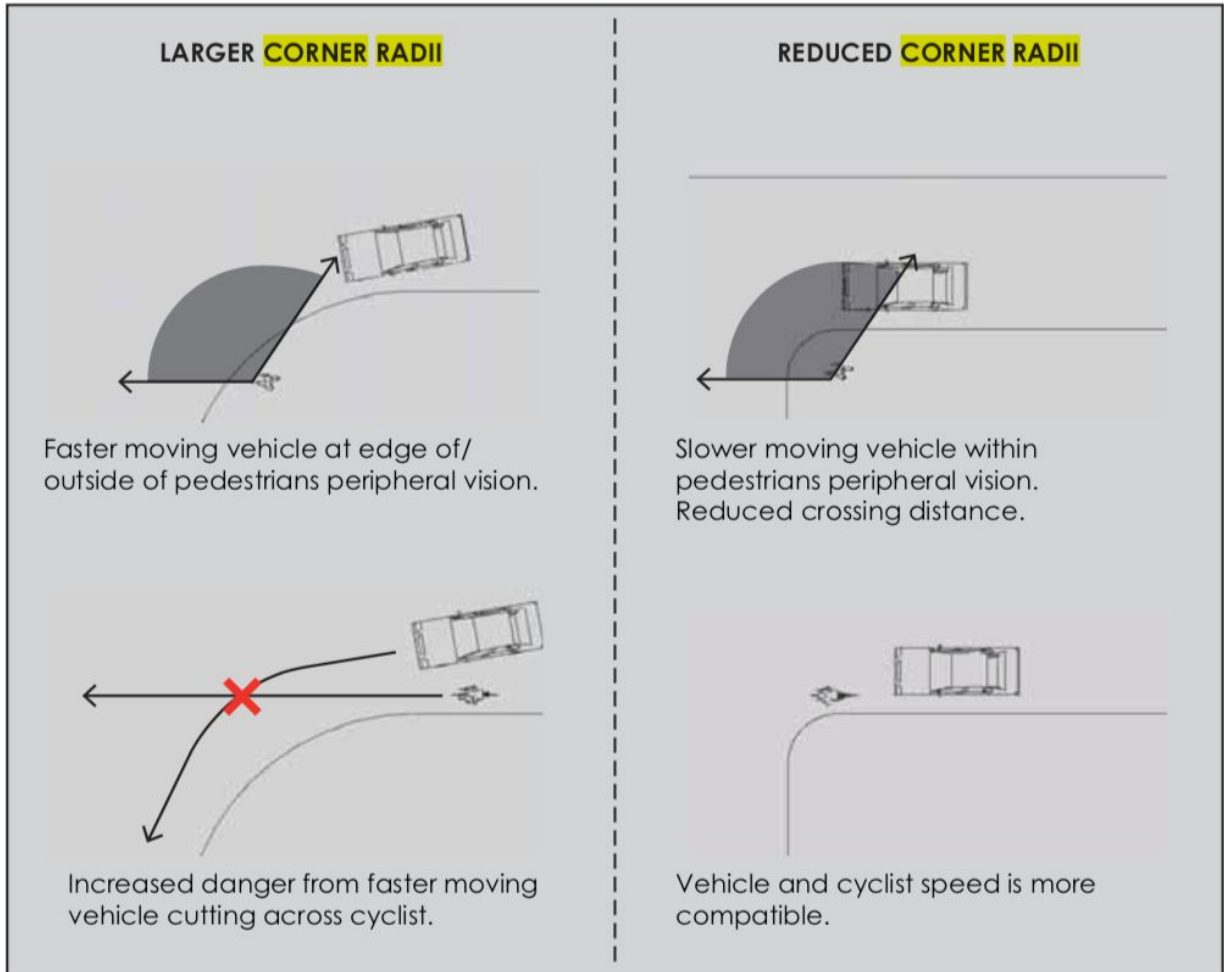


Figure 4.42: Illustration of the benefits of reduced corner radii on pedestrian and cyclist safety (images based on Figures 6.3 and 6.15 of the UK Manual for Streets (2007)).

2.0 BICYCLE PARKING

We welcome the design of the visitor bicycle parking using the recommended Sheffield stands and is weather protected.

From the designs of the Proposed Basement Plan. It is hard to determine what type of bicycle stand is being used in this development. Dublin Cycling Campaign recommends the use of Sheffield stands for a number of reasons such as security and ease of use. Sheffield stands are the accepted gold standard for end users in cities and apartments. Although it is mentioned in the mobility management plant that sheffield stands will be used in the basement bicycle parking.

The SDCC development plan references bicycle parking standards in section **11.4.1 BICYCLE PARKING STANDARDS**. “All bicycle parking spaces shall be designed in accordance with the requirements of the National Cycle Manual, NTA (2011)”

NATIONAL CYCLING MANUAL GUIDELINES

<https://www.cyclemanual.ie/manual/detailsright/bicycle-parking/#>

All bicycle parking facilities should be capable of performing the basic functions of

1. supporting the bicycle from falling over,
2. protecting it against theft
3. allowing the cyclist room to position/ lock / unlock the bike
4. Lighting
5. protection against the weather
6. ease of access

Taken from Traffic and transport Assessment document on cycle parking.

The cycle parking spaces will comprise of secure cycle spaces for residents of the development within the basement and standard ‘Sheffield style’ cycle parking stands for visitors throughout the surface level of the development. The South Dublin County Development Plan and the Sustainable Urban Housing Design of New Apartments Guidelines (March 2018) have both been adopted to determine a suitable amount of cycle parking for the proposed development.

Bicycle parking facilities can protect a bicycle against theft in two ways, either by enabling cyclists to lock their bicycle to the rack, or by providing a built storage facility that can be locked or guarded by personnel and/or cameras. It is not clear from the designs if the bicycle parking will be enclosed with security access? Bike theft is a major issue and bicycles might be prone to theft and damage if left in unsecured environments. Another large apartment block called the island in chapelizod suffers from theft for this very reason.

The Department of Housing's Guidance on Apartments (that this development must follow) lays out standards for cycle parking in section 4.17 (page 24). It recommends that cycle parking be secured.

In the proposed plans for cycle parking number on page 34 Section 3.8.2 “Cycle parking” of Traffic and transport assessment says they have provided 276 cycle spaces yet there are 136 one-beds and 114 two beds, which means there should be 364 spaces to be compliant with Sustainable Urban Housing: Design Standards for New Apartments 2018. (https://www.housing.gov.ie/sites/default/files/publications/files/design_standards_for_new_apartments_-_guidelines_for_planning_authorities_2018.pdf)

3.0 CARGO BIKES AND DISABLED USERS

There is no indication that there is bicycle parking available for Cargo bike users. These are large bicycles with a box in the front to carry groceries or children. If this development is prioritising both cycling and walking further consideration is needed to cater for people to use the car less to go shopping or travelling to local school and carry items with their bicycle. For example the ALDI shop is situated to the western side of the building. A cargo bike would remove the need for someone to drive from the apartment to purchase a large volume of groceries.

Secondly, less well abled cycle users with extra needs are not catered for in the designs. Some extra space is needed for bicycle users with special needs.

4.0 SPEED LIMITS AND BICYCLE LANES AND SIGNAGE

There is no reference to speeds in the underground car park or at the entrance to the development. There are also no cycle lanes provided at the main entrance. If a cycle lane is not feasible, traffic calming measures need to be introduced at the entrance and in the underground car/bicycle parking as it will not be safe for vulnerable road users to enter and exit the complex.

The main access ramp to the cycle and car park is also 1:6, which is far too steep for people cycling. The width of the vehicle ramp is far too wide at 7.5m. It should be narrowed to 6-6.5m with the extra space given to the pedestrian/cycle ramp with the less steep gradient

5.0 PERMEABILITY

There is only one entry and exit point in the proposed development. There is another proposed opening at the Western end of the site. This should be considered a priority and to encourage walking and cycling there should be more than one entry and exit point within the development. The proposed western entry and exit point is also very close to lots of amenities and the ALDI shopping centre. It's not clear from the drawings if pedestrians and cyclists will be catered for at this entrance or even if approval has been given to this location as it is only proposed.

6.0 CONCLUSION

We welcome this development with some minor changes in support for better cycling provision. 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 secure cycle parking facilities. Secure is the major issue to protect against cycle theft
2. The overly large car entrances that do not comply with best practices of DMURS

3. Provision for different cycle parking such as cargo bikes and for disabled users to cater for a more diverse range of cycles
4. Greater clarity on the pedestrian and cycle priority zones within the development especially at the western entrance
5. The access ramp is too steep for cyclists to the underground parking.

Regards

Paul Corcoran