Phoenix Park Mobility Report Submission Fingal Cycling Campaign

Introduction

Fingal Cycling Campaign is a sub-group of registered charity, Dublin Cycling Campaign (RCN 20102029), which in turn is a member of the national body Cyclist.ie the Irish Cycling Advocacy Network. Cyclist.ie has 27 members groups nationwide. We strongly believe that Fingal should be an area that provides liveable villages, suburban centres and parks that prioritise people over cars. We are very grateful for the opportunity to provide feedback on the extensive report prepared by the Phoenix Park Mobility Steering Group, on behalf of the OPW. We hope the feedback provided can be of value. We are all residents of Fingal with a significant desire to see the Phoenix Park fulfil its primary purpose:

- An extremely valuable recreational amenity and an area of tranquillity close to a busy city centre, as well as an educational and research resource.

It is a shame that 60% of all traffic in the Phoenix Park is using it as a commuter route. It was never designed for this use and cannot appropriately fulfil this designation. This "off-label" use of the Park's internal roads has a pernicious effect on the traffic in the surrounding environs; through traffic on Chesterfield Avenue gridlocks Castleknock, Ashtown and beyond whilst inhibiting other Park visitors from accessing the Park on sustainable not active transport.

The proposed walking and cycling networks are a substantial improvement on the present situation. Pedestrian crossings on Chesterfield Avenue and the perimeter roads are long overdue. There are some shortcomings in design, that can be overcome with minor revisions. Such shortcomings are identified and possible solutions are discussed in the proceeding sections.

Active Transport Proposals

Cycling is a key enabler of the four challenges stated in the strategy Climate Change and the Environment, Health and Equality, Growth and Change and the Economy. Active travel infrastructure is far cheaper and quicker to implement than the equivalent for motorised vehicles. It requires significantly less maintenance and gives the best Return on Investment of all transport projects. Combined with the equitability that active travel affords people, it is of little surprise to see it being ostensibly prioritised.

The OPW has commitments within the Department of Public Expenditure and Reform under agreed targets for meeting the Sustainable Development Goals (SDG). Cycling improvements will go a long way in helping to meet these targets by 2030. A report by the European cycling federation that cycling meets 11 of the 17 goals. (https://ecf.com/groups/cycling-delivers-global-goals)

On SDG 11 - Indicator: Share of green space in urban areas:

- Green areas in cities, like parks, public gardens and nearby forests fulfil a variety of functions, ranging from ecological values to recreational functions. They also provide aesthetic value and they play a role in promoting public health. In a general way, these areas contribute to a better quality of life of the inhabitants.

Ireland, however, scores last on the environment index which suggests we are facing significant challenges in meeting our environmental targets.

Walking Network Proposals

The walking network of the Park is comprehensive. The proposed improvements, Figure 1, will substantially improve the walking network increasing universal accessibility in all parts of the Park. We welcome the implementation of safe pedestrian crossing points on Chesterfield Avenue and perimeter roads.

They should be designed in accordance with Section 4.3.2 Pedestrian Crossings Design Manual for Urban Roads (DMURS) cited in the National Guidance Documents section of the mobility report.

“It is also an objective of Smarter Travel (2009) that level grade crossings (i.e. those that are aligned with the height of footways) be provided for pedestrians across junctions. These are highly recommended in areas where pedestrian flows are high such as in Centres. They are also an effective measure for calming traffic and enforcing lower speeds”
Significant traffic calming measures will be required to arrest the speed of vehicles in the Park. The uninterrupted thoroughfares in the Park encourages drivers to drive quickly.

The proposed 30kph speed limit could be a substantial improvement to the safety of Park users. Appropriate design features to slow vehicles down –narrowing of roads by reallocating road space and “raised entry” pedestrian crossings– must be implemented throughout the road network in the Park.

Figure 1 Schematic illustrating Upgraded Walking Network of Phoenix Park

Cycling Network Improvements

Figure 2 shows the implementation of safe, segregated cycling routes on nearly all roads in the park. Designing for the park visitors on active modes will encourage more visitors to use active forms of transport. As stated in the Movement Principles of the Steering Group:

- The Park is for People.
- Protect and conserve the Biodiversity and historic landscape fabric of the Phoenix Park.
- Encourage the use of more sustainable ways to access the Park.

Figure 2 Schematic illustrating Upgraded Cycling Network of Phoenix Park

There is a concerning lack of detail on the potential upgrades to the cycling network (Figure 2). For example, there is presently only a one-way cycle path on North Road towards the Ashtown Gates. That one-way cycle path is used as a footpath resulting in cyclists sharing roadspace with motorists on North Rd instead. There should be strong consideration of this ad hoc use of the one-way cycle track as a footpath. The footpath on the other side of the road is not going to be upgraded in the present proposals. This in turn increases the need for appropriate design of the cycle way to ensure it is not used by pedestrians. A solution would be to upgrade the narrow footpath on North Rd towards the Ashtown Gate or upgrade the cycle path to “Greenway” standard.

There are further improvements that should be resolved. The Mobility Report states:

- The proposed cycling network aligns with existing and planned routes external to the Park within the Greater Dublin Area Cycle Network Plan.

Despite this, the network fails to align with Route 5a (Figure 3) branch from Phoenix Park via White's Road and Carpenterstown to Blanchardstown from Coolmine. Route 5a will provide a vital connection for the thousands living in West Fingal with a vital cycling route into the city centre. This oversight should be addressed before implementation of the upgraded network. Additionally, facilitating the Route 5a will provide a safe cycling route to Farmleigh House which would fulfill the Steering Group Movement Principle to:

- Encourage the use of more sustainable ways to access the Park.

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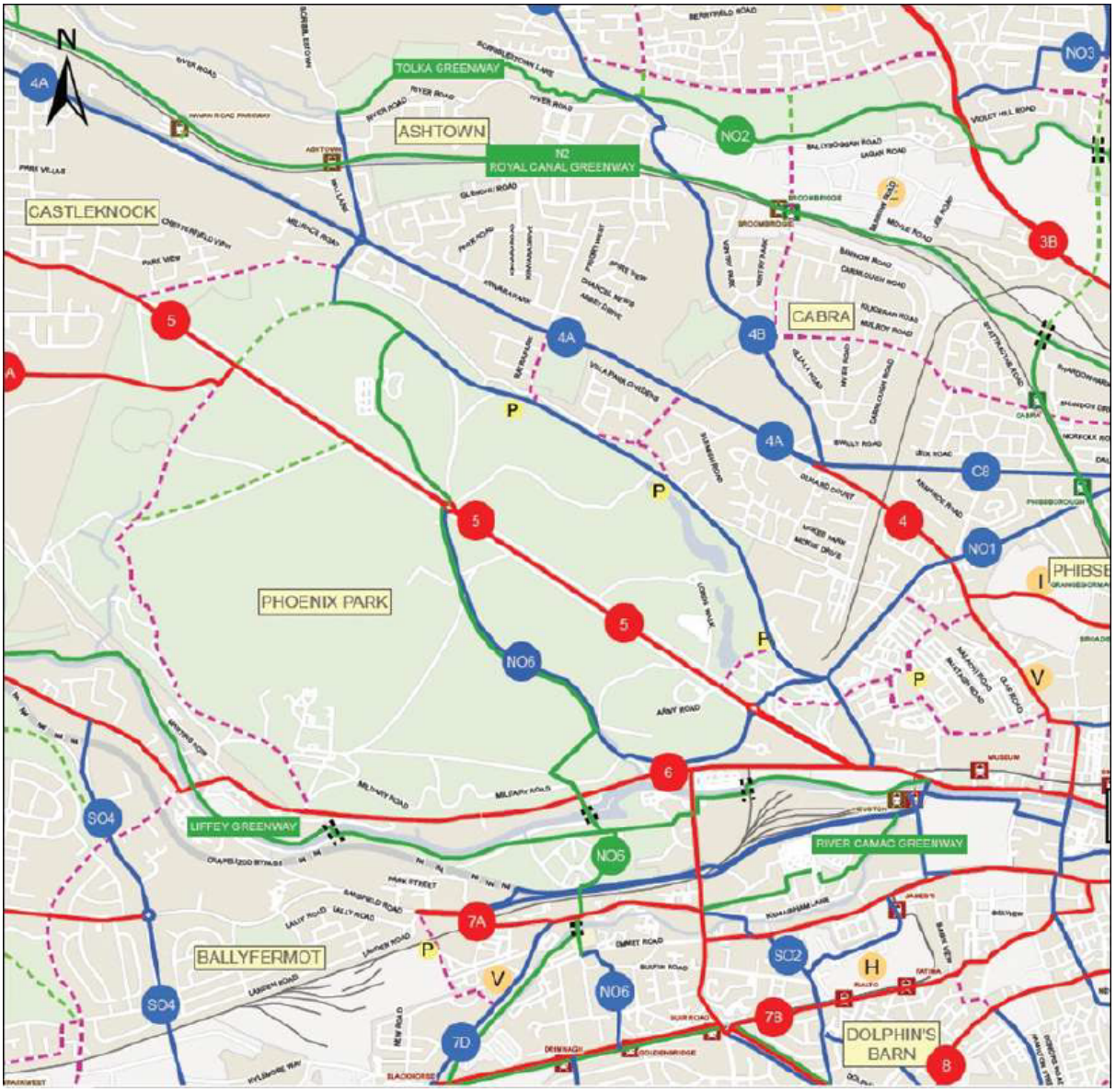

Figure 3 Schematic Detailing Greater Dublin Area Cycle Network Routes in Phoenix Park

Primary Cycle Route Width

The improvements will deliver significant portions of Primary Route 5 of the GDA Cycle Network Plan (CNP). The target quality of service for primary routes in CNP is A+/A. Figure 4 is an extract from section 2.3 of the Written Report of CNP, which outlines the desired width of primary cycle routes as 2.5m.

Basis for Target Quality of Service

ROUTE TYPE	PRIMARY / NATIONAL	PRIMARY	SECONDARY
Cycle Volume Existing (3 hour peak period)	n/a	200 -1000	100-500
Target QoS - Width Factor	A+ Two abreast + overtaking Width = 2.5m	A+/A Two abreast + overtaking Width = 2.5m	A/B Single file + overtaking Width = 1.75m
Target QoS - Other Factors	A	B	B

Figure 4 Target Quality of Service for Primary Cycle Routes according to the Greater Dublin Area Cycle Network Plan

Road Options

The Mobility report states:

- The primary purpose of the internal road network of the Phoenix Park is to facilitate access for visitors and staff of the Park.

OPW Preferred Strategy

The preferred strategy allows bidirectional through traffic to remain travelling through the Park. Removing the ability to exit from Ashtown Gate without preventing through traffic from the Chapelizod Gate will result in significantly more traffic exiting the Castleknock Gate. This traffic will compound the gridlocked Castleknock Village. According to statistics generated by the citizen led transport monitoring experiment Telraam (https://telraam.net/en/location/9000001348), there are an average of 700 vehicles per hour travelling through Castleknock Village between 08:00-18:00.

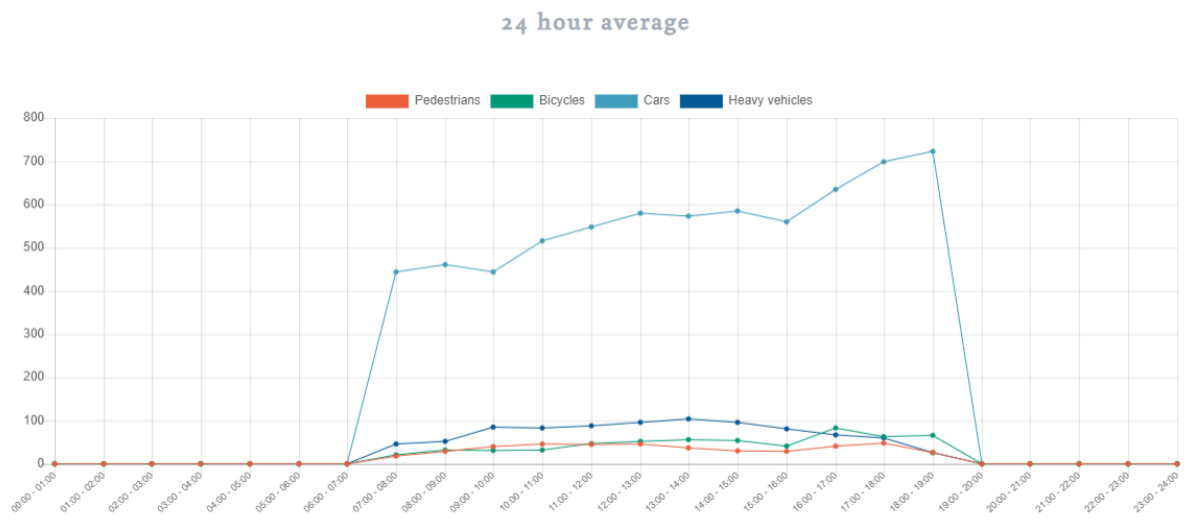

Figure 5 Graph Illustrating Significant Volumes of Traffic on Castleknock Rd (Oak Lawn)

Castleknock Village has been choked with traffic for years. The Phoenix Park's inadvertent use as a strategic commuter route has contributed substantially to this congestion. Figure 5 represents the traffic travelling through on the Castleknock Rd during Covid-19 related lockdown restrictions. When restrictions lift, the traffic measured will soar.

Figure 6 Schematic Detailing Road Option 3 (OPW Preferred Strategy)

The OPW preferred strategy (Road Option 3), Figure 6, will not resolve the root cause of the major source of traffic in Castleknock village. The preferred strategy, by allowing through traffic in the park,

will have a high probability of increasing the traffic through Castleknock Gate. Commuters travelling north through the park, who have their exit prevented by Ashtown Gate being entry only, will continue their journey through Castleknock Gate instead. There could be up to a 135% increase in peak traffic exiting the Castleknock Gate (Figure 7).

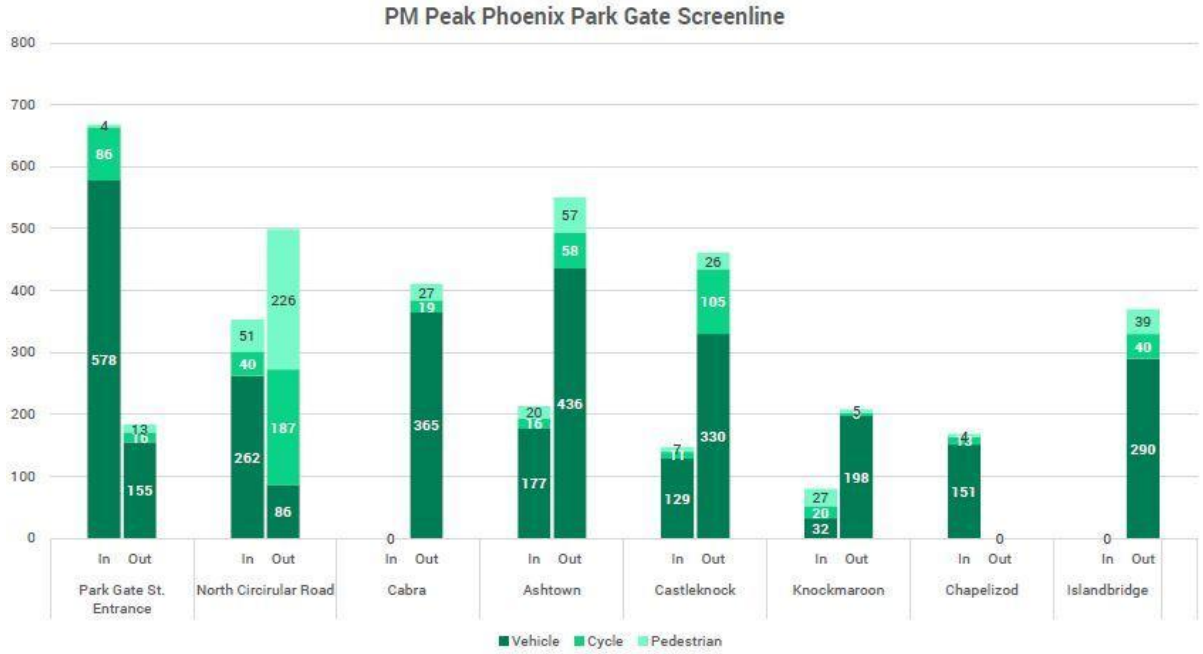

Figure 7 Schematic Illustrating PM Peak (17:00-18:00) Traffic Phoenix Park Gate Screenline

Castleknock is the gateway to the Phoenix Park for most of Dublin West. A gridlocked Castleknock limits the ability of Park users in Dublin West to access the Park using sustainable transport. The decision to facilitate commuter traffic on Chesterfield Avenue fails to meet Objective Castleknock 3, Objective MT04, Objective MT13 of the Fingal County Council Development Plan.

Observations

The following observation is made in support of Option 3:

- In time Knockmaroon gate should be closed and this will eliminate cross commuter traffic from M50 toll charge evasion

Most vehicles use Knockmaroon Hill/College Rd as their toll evasion route. According to the citizen led transport monitoring experiment Telraam (College Rd: https://telraam.net/en/location/9000001349, Chapelizod Main St: https://telraam.net/en/location/9000001516). Alternatively motorists avoid the toll by entering the Park via Chapelizod Gate and exiting through Castleknock, Ashtown, Cabra or Infirmary Rd Gate. Motorists will alter their commute by three minutes, travelling by Acres Rd onto Chesterfield Avenue and continue their commute across the Park. This observation appears to contradict the second observation stating that:

- Commuters have access to the Park as a through route.

The through traffic using the Park as a commuter route is one of the root causes of the gridlocked traffic in Castleknock, Chapelizod and Navan Rd environs. Thousands of commuters use the Park

-60% of all Park traffic is through traffic- and flood into the surrounding environs traffic systems, none of which are designed to cope being major arteries for the commuter traffic of west Fingal.

Figure 8 Schematic Detailing Road Option 10 (Pod System)

The innovative Pod System detailed in Option 10, Figure 8, which prevents the Park being relegated to a shortcut, would eliminate significant amounts of traffic in the surrounding areas as stated in their observation:

- No commuter route into Dublin City through the Park.

This would have enormous benefits for the biodiversity, safety, recreational users and tranquillity of the Park due to the significant reduction (up to 60%) of vehicles on all roads in the Park. The report makes an observation on the preferred strategy that contradicts the Steering Group Movement Principles that:

- will seek to reduce commuter through traffic.

The second observation on the preferred strategy states:

- Commuters have access to the Park as a through route as all gates open

Furthermore an observation made regarding Option 6 states:

- Commuters spend longer travelling around the Park and negative environmental impacts.

This appears to contradict the OPW preferred strategy which forces commuters into longer journeys, driving commuters from Glen Rd to Acres Rd, through the Park to get to their destination. This scenario contradicts the observation that:

- Biodiversity and tranquillity are improved throughout the Park.

There is also an opportunity to open up more access to the Phoenix Park which was highlighted during their recent consultation on the strategic vision for the Park. There were multiple submissions on opening up access to the Park via Knockmaroon Gate entrance by enhancing access via the Silver Bridge (Guinness Bridge/Farmleigh Bridge). This would make the Phoenix Park more accessible by cycling and walking from people in Palmerstown/Lucan areas. An area that contributes substantially to the Park's traffic. The bridge is currently awarded €1.44million by Fingal County Council in its current capital programme of works for 2021-2023. The OPW should liaise with Fingal County Council and South Dublin County Council to improve connectivity to the Park via the Silver Bridge.

Multi Criteria Analysis

The observations appear to be derived from the Multi Criteria Analysis undertaken by the authors of the report. There appear to be inconsistencies in the scores assigned to the various options under particular assessment criteria.

Theme	Assessment Criteria	Option 1	Option 2A	Option 2B	Option 2C	Option 3	Option 4A	Option 4B	Option 4C	Option 5	Option 6	Option 7A	Option 7B	Option 8	Option 9	Option 10
Environment	The historic setting of the Phoenix Park including its archaeological, architectural and sensitive landscapes are enhanced through these measures.															
	Minimise the impact on surrounding residential areas and road network.															
	Reduce traffic volumes in the Phoenix Park resulting in a reduction of associated environmental impacts e.g. noise, air, pollutants.															
	The biodiversity, ecosystem services and habitats of the Park are not negatively impacted by these measures.															
	Any proposals to be sustainable and resilient to climate change impacts.															
	The preserved views, vistas and protected structures within historic landscape setting of the Phoenix Park is not negatively impacted.															
	No net loss of trees or green areas as a result of proposed interventions.															
Aggregate Score																

Figure 9 Schematic Detailing Environmental MCA (Phoenix Park Mobility Report)

The OPW preferred strategy, Option 3, will still facilitate through traffic in the Phoenix Park via Chapelizod, Ashtown, Castleknock, Infirmary Rd and Parkgate St Gates. Implementing a cul de sac on Glen Rd without preventing through traffic in the Park will not sufficiently discommode drivers to nudge them to stop using the Park as their primary commuting route. Only a moderate adjustment is required for cross Park commuters using Chapelizod Gate. They will journey on Acres Rd rather than Glen Rd before continuing their journey on Chesterfield Avenue. This will result in far greater numbers of vehicles travelling on Acres Rd drastically disrupting the biodiversity and tranquillity of the 15 Acres.

Furthermore it appears contradictory that unquantified considerations outside the scope of the study are allowed to negatively impact on certain Options in the criteria –namely Option 10- whilst the OPW preferred strategy criteria states that it will result in an improvement in traffic in the surrounding areas. The report states:

- Whilst option 10 effectively eliminates the vast majority of through traffic in the Park, the impacts of this on traffic volumes and subsequent environmental impacts on surrounding neighbourhoods would be considered to be significant and would have to be subject to further impact assessment outside the scope of this Study.

Given the impacts on surrounding neighbourhoods are outside the scope of the study it is unusual that the OPW Preferred Strategy is assigned an MCA score (Figure 9) of improving the traffic in surrounding areas.

Figure 10 Schematic Detailing Accessibility and Social Inclusion MCA (Phoenix Park Mobility Report)

The observations for option 10, specifically highlight the pod system as uniquely positioned to facilitate public transport options by eliminating all though traffic in the park. It is axiomatic that eliminating through traffic in the park will inevitably make active modes of transport safer and attractive. It is not clear why Option 10, Figure 10, receives a worse score than the OPW preferred strategy for the assessment criteria to

- Enhance access to the Phoenix Park institutions, key attractions and amenities providing for pedestrians, cyclists and other sustainable modes of transport.

The Pod system, Option 10, utterly removes through traffic in the park reducing traffic volumes by 60-70% during peak times. The OPW preferred strategy by facilitating through commuter traffic, concentrates through traffic on Chesterfield Avenue as stated in the summary of the Road Options section of the Report:

- to cater for elements of through traffic demand in a centralised location.

Figure 11 Schematic Detailing Safety MCA (Phoenix Park Mobility Report)

It seems highly unusual that this would result in the same criteria assessment score as Option 3 that expressly facilitates through traffic. There are serious concerns with the MCA undertaken given the seemingly contradictory and arbitrary scores assigned.

Conclusion

The OPW's preferred strategy should fulfil the Movement Principles established by the Phoenix Park Mobility Steering Group. It should prioritise active travel. Promoting active travel meets many of the criteria and objectives detailed in the report. Facilitating through traffic, as Option 3 does, still prioritises vehicles over people. The OPW should demonstrate leadership. The novel Pod System, Option 10, approach should be implemented as the preferred strategy. This will yield the best results for active travel, safety, biodiversity and tranquillity of the Park. We would be delighted to meet with the OPW and designers at any stage to discuss any of the points raised in this submission.

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