





Senior Executive Officer
Planning and Strategic Infrastructure Department
Fingal County Council
Main Street
Swords
Co Dublin

Submission to Fingal County Council Snugborough Road Project 23rd February 2017

Introduction

On behalf of Dublin Cycling Campaign/Cyclist.ie/An Taisce, I would like to express reserved support for the proposed developments at Snugborough Road on the busy N3 Interchange intersection, but with a number of reservations.

This ambitious project may possibly help to alleviate general congestion in this major traffic intersection, but the lack of any background report to this project does not enable independent assessment of this requirement. Having said that it has the potential to create a workable active travel link between the busy Blanchardstown Centre and ancillary commercial activities, and surrounding local residential estates, as well as the large attraction of the National Sports Campus. It also has the potential to link into the great amenity, that will ultimately be the River Tolka Valley Greenway route. It is important that the active travel elements of this project, if constructed, are connected to all local amenities and schools, so that the benefits are fully realised. It has the potential to increase cycling and walking in the Blanchardstown area.

Cyclist.ie warmly welcomes the construction of high quality cycle routes by Local Authorities, where their impact on the built and natural environment has been thoroughly assessed and where they have been designed and constructed and maintained subsequently in a manner sensitive to those considerations. In this case the new bridge construction, and the active travel links to the Tolka Valley river route should be properly assessed. It is unacceptable that a full engineering/environmental report is not available as part of the consultation documentation.

We would hope that this proposed route, as outlined in the consultation drawings, will bring health and economic benefits to the area and encourage commuters and other travellers to switch travel mode to the more sustainable mode of cycling. While we welcome the public consultation on the proposed improvements, we have been disappointed with:

- The difficulty of finding the consultation online. We recommend that Fingal County Council, as has been done in a number of other Local Authorities, place the 'Open Consultations' link directly on the home page of the website, to enable citizens to access consultations easily.
- The fact that no Engineering Project Report is included with the consultation documents. This is
 unacceptable, as such a report helps to explain the context of the proposed changes, provides
 detailed background on social and environmental considerations, and in the case of this bridge

- project, the effects on the Tolka River valley, as well as providing information on existing and proposed traffic volumes.
- The attached drawings, which do not contain enough detailed information to scale off the proposed improvements in relation to footpath, cycle track, and carriageway widths. This level of detail should be a standard feature of any proposal put out for public consultation. The principle of easy access and clear information for the general public should be adhered to.
- The boundaries of the project, which we recommend should be extended to include the N3 pedestrian/cycling underpass between the Old Corduff Road and Main Street, Blanchardstown, as well as clarity on the links in with existing facilities.

In line with the aims of the National Cycle Policy Framework (Department of Transport 2009), the proposed scheme should help prompt an increase in cycling and walking. Furthermore, we would hope that the facility will help to reduce local car usage in the area, especially for short trips, thus helping to relieve local congestion in the surrounding areas. The amenity could also be used creatively to get school children back cycling again and developing life-long healthier habits. Promotion of the facility once built, is critical to its long-term success.

Specific Comments on the Snugborough Road Scheme

- We recommend that, as part of this project, clear signage to the cycle/walking route options from areas close by be erected, both for local and visitor information alike, to maximise active travel usage of the proposed routes. There are some major restrictions to clear cycling routes at the new proposed intersection on the west side of the N3, and access to desired routes need to be clearly signalled in advance.
- We recommend that the upgrade of the N3 underpass be included in the final project brief, as this is a vital and safe option for pedestrians and cyclists, travelling between Blanchardstown Village and the National Sports Campus, to avoid the major traffic snarl that characterises the existing junction layout. Improved public lighting would be a critical part of this upgrade.
- In the exhibited drawings we are disappointed with the extent of the project boundaries, and how the cycling details proposed are meant to link in with existing facilities outside the present project boundaries. This has particular application on Main Street in Blanchardstown, on the L3020 route into the Blanchardstown Shopping Centre, on Snugborough Road west of N3 and especially access to offices and social welfare centre, and on Waterville Row on the East side of the N3, which has a potential link into the Tolka Valley River Park. These issues need to be addressed and clarified.
- Due to the lack of clarity on the exhibited drawings, it is difficult to be clear on the widths of the various pedestrian and cycle facilities proposed. But, from a level of interpolation of the cross sections, it would appear that these facilities only comply with the minimum standards as set out in the National Cycle Manual, and no more. As no accompanying engineering report is provided, the reasons for the choice of minimum standards is not clear.
- It is not stated on the exhibited drawings if the traffic crossings are Toucan crossings. This is of course important for their use by cyclists.
- The legibility and interconnection of cycle routes at the major west side (Snugborough Road/Main St/L3020) intersection are unclear. It would appear that there are proposed shared spaces at the four corners of this major junction to enable cyclists to turn left at any corner. Dublin Cycling Campaign, in line with the recommendations of the National Cycle Manual (Section 1.9.3 'With the exception of purpose-designed shared streets, shared facilities should be avoided in urban areas as far as possible') are not in favour of shared spaces as they create conflict between pedestrians and cyclists.
- 7 The legibility and interconnection of other cycle routes at this major west side (Snugborough Road/Main St/L3020) intersection are also unclear.
 - How are cyclists exiting Blanchardstown shopping centre meant to access Main St Blanchardstown and vice versa? On the basis of the exhibited drawings available, this is not possible other than through a tortuous route through a variety of crossings

- How are cyclists exiting Blanchardstown shopping centre on the L2030 meant to access Snugborough Road in the direction of Clonsilla?
- How are cyclists turning right into Blanchardstown Main Street from Snugborough Road (Clonsilla Direction) meant to navigate?
- How are cyclists crossing on new proposed 2 way route and either heading to Blanchardstown Shopping Centre or continuing along Snugborough Road, supposed to navigate the junction?
 In general we support the new arrangement of junctions at the east side of the N3, and the removal of the present roundabout. This will help to make it safer for cyclists, but we recommend that the cycle route section between Waterville Row and the N3 On-Ramp requires greater protection from significant left turning traffic, and should ideally be 'off-road'. A specific arrangement that allows separate cycle/walking signalised access should be explored.
- In line with the National Cycle Manual Section 4.1.5 'The Need to Confer Advantage on the Bicycle', it is not clear that the overall design for this Snugborough Road project is actually achieving this goal. As we have pointed out above there are deficiencies in the design in relation to cycling desire lines that are not adequately addressed.
- We are disappointed that the option of a 30kph speed limit, on access routes to this major scheme, has not been considered. In particular we recommend 30kph limits on Main Street Blanchardstown, on the L2030, and on Waterville Row, with any necessary physical intervesntions. This will help to give greater protection to cyclists and pedestrians.

General Points

Bicycle Parking in the area

It is strongly recommended that the opportunity be considered to introduce attractive and sheltered bicycle parking stands at various facilities close to this route. For details of cycle parking planning and design, see Chapter 5 of the National Cycle Manual (National Transport Authority 2011).

Signage

The provision of the cycling facilities on this route is likely to generate increased cycle (and pedestrian) activity on the surrounding roads. The Local Authority should provide appropriate signage on the adjacent roads to warn motorists of the increased likelihood of encountering (young and potentially inexperienced) cyclists on the road. Adequate directional signage for cyclists and pedestrians should also be provided at critical points.

• Upkeep-Maintenance

An essential part of a successful cycleway is upkeep. A route can easily fall into disrepair with broken glass, litter and uneven surfaces immediately making the track undesirable to the public. We would like to highlight the need for a maintenance regime to be put in place which is specified and executed in an appropriate manner.

Opportunities to link with Green Schools

The Green School Initiative is a highly publicised, student-led initiative operated by An Taisce. Sustainable travel is an integral part of the programme amongst other aspects of sustainable living. We would encourage Fingal County Council to assess if any nearby schools are involved in Green Schools. If so, we suggest that the cycle route improvements be promoted through this initiative. If not, the schools should be encouraged to join the Green Schools initiative. In this way it could prove to be an excellent platform to heighten awareness and increase cycle traffic on the proposed route, thus facilitating its success.

Road Safety Audit Process

Stage 1-3 Safety Audits for the proposed scheme should be carried out.

Conclusion

Dublin Cycling Campaign gives a guarded welcome to this overall proposal but we are disappointed that:

• There is no accompanying Engineering Report enabling the clear assessment of the proposals. This should a standard provision of the exhibition process.

- There does not appear to have been full consideration to provide clear advantage to walking and cycling as recommended in the National Cycle Manual
- The exhibited drawings do not clearly provide details of the proposed carriageway and cycle/pedestrian widths.

We are hopeful that our commentary will assist Fingal County Council in advancing an effective scheme, and we would be grateful if you could acknowledge receipt of this submission and advise us of any further decisions made in regard to this application.

Yours

Colm Ryder Chairperson, Cyclist.ie

c/o An Taisce

Back Lane, DUBLIN 8

Tel 00353-87-2376130

Email <u>colmryder@gmail.com</u>

www.cyclist.ie www.dublincycling.ie