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Sandyford BD Cycle Route

Submission to Public Consultation

October 2021

Dear Traffic and Road Safety team,

Thank you for the opportunity to make a submission to the public consultation on the Sandyford Business District Cycle Route. This is a commentary on the [July 2021 proposals](#) to install cycle routes in Sandyford Business District.

If you would like to follow up on anything in this submission, please feel free to reach out to me on ooconnor@cllr.dlrcoco.ie.

Kind regards,

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Feedback summary

With national climate action goals to reduce emissions by 51% between 2021 and 2030, this will require local authorities to plan transport projects that drastically reduce emissions from private cars. Despite the urgency to reduce transport-based emissions and national and local policy to move away from private car use as the dominant mode of transport, the proposed plans are a continuation of the Predict & Provide model of transport planning with some sustainable transport provision installed alongside. The current project does very little to reduce car use and so does not pull its weight in terms of climate action.

The current plans appear to be an attempt to retain Sandyford Business District as a car-centric area with high noise pollution, high air pollution, chronic congestion, unpleasant car-dominated streetscapes and peripheral active travel provision. There are opportunities to provide better, more people centric spaces within the proposed project. For an almost €5m price tag, there should be a broader ambition than adding small cycle tracks to the side of roads with the retention of existing traffic levels.

I am asking that the DLR Department of Infrastructure and Climate Change provide new guidance and objectives for the designers of the scheme and that the scheme be largely redesigned from scratch to fit these objectives.

Sandyford BD context

In the next 10 years there is expected to be a large growth in residential population and growth in office-based employment in Sandyford BD. There will also be a decline in long-distance office commuting by car and other actions at national and local level to limit private car use and increase use of public and active transport.

Sandyford Urban Framework Plan (SUFPP) as part of the 2016-2022 County Development Plan sets out some objectives and designated "green cycle/pedestrian routes" within Sandyford BD. Likewise some roads are earmarked as local 30kph roads. The SUFP also has an objective around how roads are used: "It is an objective of the Council to ensure that road design and quality of landscaping treatment reflects its role within the hierarchy of routes".

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Sandyford BD needs to become a much more attractive place to live and work. The current mindset around Sandyford BD appears to be to attract highly qualified people from all over the Greater Dublin Area to work in Sandyford. The ambition needs to switch focus to making Sandyford BD a place that people want to live in and around. This can be done by providing more people-centric spaces and designing for lower car traffic volumes on all roads.

General observations

There are no objectives

The report received on the Sandyford BD plans did not include any of the elements I would expect from a long-promised scheme. There are no scheme objectives, and therefore no way to measure the success of the scheme. A set of objectives should guide the scheme design so that specific outcomes are achieved that realise benefits for the public. The objectives could help frame a discussion between the elected members and the executive. In my view, all planned schemes of this scale should begin with a workshop between council officials, councillors and design consultants to identify what it is we are trying to achieve with the scheme. Instead, the impression I get is that the objective of the scheme is to deliver the scheme.

Some themes I would like to see covered by objectives for the Sandyford BD scheme:

- Increase number of walking and cycling trips in Sandyford BD
- decreasing total paved area and more SUDs
- changing the character of the roads in Sandyford so they are less motor traffic focussed and more people-friendly.
- Decreasing private car traffic as Sandyford grows, while increasing mobility through modes of transport that are efficient uses of space
- Decrease bus travel times through Sandyford BD

In the absence of any objectives, neither the design consultants nor the elected members really understand what the executive are trying to achieve with this scheme. The only clue as to what the objectives are is the references to design decisions being taken because of the nature of motor traffic at junctions (speed and volume). If the primary objective was active modes, this reasoning would be reversed.

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There are no targets

If we're trying to grow walking and cycling mode share, by how much? Are we trying to reduce congestion, and if so, what are the metrics? Reduce vehicle volumes? If this is part of our climate efforts, what tonnes of CO2 are generated on these roads currently and what do we hope to reduce it to? There are no quantifiable metrics by which to measure the success of the scheme.

Some good design principles

Some design principles adopted in the scheme are very welcome and would improve conditions in Sandyford BD somewhat. These are:

- Reduced traffic lane widths.
- Tightening corner and junction radii
- Removal of (some) left slip turns and (some) pedestrian refuge islands
- Efforts to segregate cyclists from motor traffic
- Additional crossing points and narrower crossing points for pedestrians
- Widened footpaths and increased pedestrian space, wherever it doesn't impact too much on private car traffic
- Cycle tracks going behind bus stops to avoid conflicts with bus drivers.
- Reduced number of traffic lanes (albeit far more limited than it should be)
- Use of parking-protected cycle lane

The designs overall fall short of current best practice in DLR

The designs for the Sandyford BID cycle routes are similar to schemes designs in the early 2010s when there was much less public and official appetite for prioritising active modes over car-based transport. It comes in stark contrast to other work in DLR such as the CMR, Dundrum and the Active School Travel route plans. I believe this partly stems from the issues highlighted above - lack of objectives for the scheme.

In practice, this makes it a scheme that prescribes the private car as the main mode of transport rather than following the DMURS hierarchy of road users or prioritising efficient and sustainable transport modes. **Large scale reallocation of space from private cars to**

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sustainable modes of transport must become a key component of this scheme or else it should not proceed.

My main issues with the designs are:

- Shared space between pedestrians and cyclists at multiple junctions despite this not being international best practice. Nothing short of protected junctions should be considered.
- Retaining motor traffic-dominated junctions and roads which could be scaled down to reduce junction vehicle capacity. Reducing traffic emissions is not possible without reducing traffic volume, which is not possible without reducing traffic capacity at junctions.
- The use of painted lanes in and around minor side roads and junctions is a design feature that reduces safety and comfort for cyclists. There is almost as much distance covered by painted lanes as segregated lanes in the scheme. A different design has been used in schemes in Stillorgan recently and is now the best practice.
- No buffer between traffic lanes and cycle tracks. Even the National Cycle Manual suggests a buffer for comfort.
- The proposed 50mm kerb for a raised cycle track may be “in accordance with the National Cycle Manual” but it is not in accordance with best practice to avoid illegal parking, particularly by drivers of large commercial vehicles. Following the National Cycle Manual specifications despite this design being a known issue amounts to knowingly designing infrastructure that will discourage less confident cyclists. Here are examples of this happening with 50mm raised cycle tracks in nearby Stillorgan and nearby Burton Hall Road, despite drivers having alternative loading facilities.

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- No true protection against illegal parking in known hotspots. One afternoon visit to the subject site would have revealed the illegal parking issue prevalent on existing lanes with paint and bollards.
- Cyclists needing to move through multiple toucan crossings to make their way through junctions. This is completely unacceptable as a design feature, prioritising convenience of private car drivers over people using sustainable, efficient modes of transport.
- It's not clear how cyclists will access buildings or entrances along the routes. Vehicular entrances should not be considered the sole means of accessing properties along all roads.
- There is no bike parking marked within the scheme. Bike parking and how cyclists access it should be designed into the scheme. E.g. outside shops, places of interest etc.
- There is little to no pedestrian priority crossing over unsignalized side streets e.g. continuous footpaths, zebra crossings or raised table crossings.
- Bus stop placement should not be exactly parallel but 'tail to tail' where possible. This arrangement could also potentially allow for wider cycle lanes bypassing the bus stops.
- The proposals include removal of 40 trees. There is no justification for this. Trees are an inherent part of the street. If additional space is needed for walking and cycling, this should come from repurposed space for cars and not from removing trees. Trees should only be removed as a last resort where all other options have been exhausted.

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Nearby low quality cycling infrastructure need upgrading as part of the scheme but excluded

The extents of the scheme are too small and fail to address issues with existing poor quality cycling infrastructure on adjacent roads. A continuous, coherent network needs to be planned. The construction would obviously happen in phases of priority/practicality, but upgrades to pre-existing sub-standard infrastructure should be included in the programme. While driving is a smooth, convenient experience from all approach roads to Sandyford BD, cycling is dangerous, disjointed and inconvenient. Specifically, some low-cost but high impact improvements that would increase usage would be:

- The approach from Leopardstown Road (S) currently crosses the entrance to the Clayton Hotel, which means crossing 8 lanes of traffic lanes including slip turns. A cyclist crossing here must press and wait for 3 different crossings. This junction should be drastically reduced in vehicle capacity and contain direct continuous cycling.
- Blackthorn Drive from Drummartin Road to Benildus Avenue: these lanes are too narrow, in the door zone of parked cars/bus bays and largely unprotected. Meanwhile there are 4 wide traffic lanes down the middle. The space is there to vastly improve the provision here.
- Blackthorn Drive from Benildus Avenue to St Raphaela's Road: the junctions either end are hostile for cycling and walking but very generous to private car users. The painted lanes are regularly parked in despite there being 4-5 lanes dedicated to private car users.
- Provide a more direct cycle track on Blackthorn Avenue leading towards the Burton Hall Road junction. Provision should also be made for a contra-flow cycle track on Blackthorn Avenue.

Addressing just these 4 locations would improve connectivity and mean more people using the areas already proposed by the scheme.

Tie-in with new roads omitted

The report on the scheme doesn't recognise the existence of the two adjacent road expansion schemes even though these two schemes would directly interact with the cycle

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route proposals on the Blackthorn Road. There is also no mention of these schemes in relation to motor vehicle capacity. If these roads do go ahead (I think they shouldn't - they embody the predict & provide policies that are now recognised as incredibly damaging to the urban environment and the planet), then the capacity increases from the roads should be offset by capacity decreases in the cycle route scheme. Given that the scheme report considers private motor vehicle capacity to be an immutable fact, this would require a change in mindset from the supporters of the road expansion agenda.

A high cost scheme for marginal benefit

The cost of this scheme seems extremely high for such a small benefit for sustainable transport. I don't believe this is good value for money and will be writing to the NTA and the Minister for Transport asking them not to fund it if the designs progress as currently proposed. A delay to this scheme is much more preferable to doubling down on the existing approach. Sunk cost fallacy is spending millions on a sub-standard active travel scheme to save tens of thousands on restarting the design from scratch again.

No bus priority measures

I was surprised not to see any bus priority measures whatsoever in the scheme. Despite limited public bus services in Sandyford, many of the employers run bus services for their employees. Without bus priority measures, there is little incentive for additional bus services as buses will be stuck in the traffic congestion with private cars.

Traffic engineering focus to the exclusion of public realm

The plans seem to very much focus on the movement of cars and people, rather than exploring the public realm options as part of the scheme. In particular, Carmanhall Road which is a local internal road within Sandyford BD has an opportunity for the creation of a pocket park by limiting motor traffic movement.

It is important that a multi-disciplinary approach is taken to permanent schemes that come with such a high cost as there are opportunities that will be missed by emphasising traffic engineering over other design considerations.

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Feedback on specific elements of the scheme

I'll share my feedback on specific elements of the scheme, going through the drawings 1-12 as pictured in the overview below.



Carmanhall Road (Drawings 1-4)

I don't believe the current proposal for Carmanhall Road is the best option available. The most conventional option appears to have been chosen. The drawbacks of the current proposed set-up are:

- Far too much painted lanes which offer no protection to cyclists and are likely to be parked in.
- Vulnerability for cyclists at all side junctions
- There's no buffer between the cycle lanes and the traffic lanes.
- The cycle lanes near Dunnes will be easy to park in and will be parked in regularly. Particularly in the evenings when there is no parking enforcement. Low kerbs or ugly plastic traffic wands won't prevent this.

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- Trees are being removed which seems unnecessary. Public Realm Objective 9 of the Sandyford Urban Framework Plan 2016-2022 states "It is an objective of the Council to protect the mature trees and their setting at Burton Hall and along Carmanhall Road."
- Through-traffic is being retained which is unnecessary. Blackthorn Drive and Blackthorn Road are parallel to this road and have the function to carry through traffic. The Sandyford Urban Framework Plan 2016-2022 designates Carmanhall Road as a "Local Road - Level 4 (30kph)". A 30kph road like this should be designed and planned for low traffic volumes and speeds, enabling the road to be shared by motor traffic and cyclists without the need for dedicated cycling facilities the whole length of the road.
- A loading bay is proposed on Carmanhall Road by Dunnes. Access to this loading bay requires vehicles to cut across the cycle lane, creating a hazard for cyclists. This is an unsafe design.

Another three viable options are:

- 1) A two way cycle track on the northern side and two way traffic. There are no through roads on this side, so traffic volumes would be low. More trees would be retained, it would be a better experience for cyclists, there wouldn't be a conflict with loading bays and there wouldn't be a conflict with the busy turn into Dunne's. A 2 way cycle track would enable more space for a horizontal and vertical buffer that would make cycling more comfortable and prevent illegal parking.
- 2) A two way cycle track on the northern side and one way traffic between Dunne's and Blackthorn Rd. Additional benefits to 1) would be: reduced traffic with less noise and air pollution creating a more liveable street, more space to retain and increase trees and grass verges.
- 3) No dedicated cycling facilities along Carmanhall Road, but a modal filter to prevent through traffic. This would significantly reduce traffic volumes and restrict Carmanhall road to traffic that has a destination on Carmanhall Rd or adjacent side roads. The modal filter could be placed anywhere and could be done in conjunction with other changes to traffic movement onto and along Carmanhall Road. The modal filter could create a pocket park.

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One suitable location for the Carmanhall Pocket Park could be between Raven's Rock Road and Arkle Road. Below is a very rough concept for a new pocket park right in the centre of Sandyford on Carmanhall Road.



The Carmanhall Pocket Park above would have seating and other placemaking elements to make this a destination in the centre of Sandyford BD. With much less through-traffic the area would be quieter and more pleasant. There could also be space for a small play area and exercise equipment.

Other issues with Carmanhall Road:

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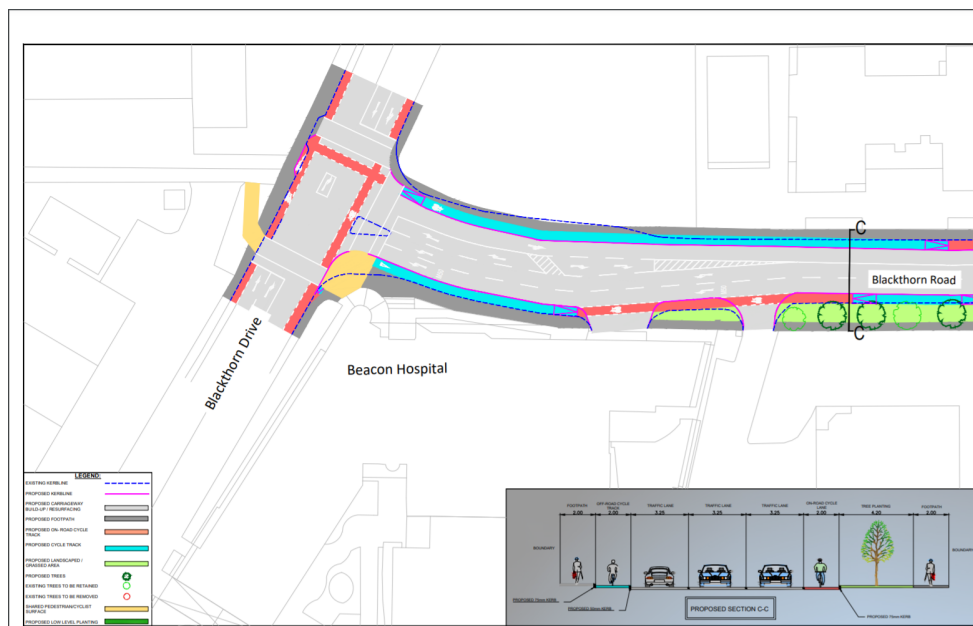
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- The loss of parking along here generally is acceptable. There is already an over-abundance of parking in Sandyford BD, which encourages more short-distance driving.
- A blue badge parking bay has been removed and must be replaced. I would favour having two blue badge parking bays and a loading bay (possibly time restricted) in front of Londis.
- The removal of the trees along Carmanhall Road is avoidable by implementing one of the above solutions. I accept that sometimes trees need removal as part of sustainable transport upgrades, but it should be done when all options have been exhausted. In this case, the other options should be fully explored and consulted on before considering tree removal. It's unacceptable for trees to be removed when there are options that could avoid this.

Blackthorn Road (Drawings 5-11)

Drawing 5 feedback - Blackthorn Drive & Blackthorn Road junction and approach



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- Both options laid out for the junction here are very disappointing to see. We need to see proper protected junctions that keep pedestrians, cyclists and motor vehicles separate from each other.
- The removal of the double slip lane is definitely a positive here and will keep pedestrians and cyclists safer while providing a more straightforward crossing for pedestrians.
- The crossing is still too far for pedestrians. This is the main route for patients and staff of a hospital to access the nearest shops, car park, Luas station and public open space. A 15 metre crossing across 4 traffic lanes, one cycle track that is shared with cyclists on one side of the road is not a high level of provision for pedestrians. It also requires a longer pedestrian crossing time and makes it more difficult to cross completely across both roads in one crossing.
- The lack of protection at side roads here is dangerous for cyclists. Cycle tracks should remain raised across minor roads and private entrances.
- The existing illegal parking in front of the shops will not stop with this design as these low kerbs are easy to mount. The parking enforcement regime in DLR is years away from being able to keep cycle lanes like this clear at most times.
- The provision of 2 stacking lanes for turning left reduces available space for pedestrians and cyclists, retains a high traffic capacity inducing demand for private car traffic and makes for a more hostile, car-dominated environment in front of the hospital and the shops.

Suggestions for improvements:

- The cycle tracks here need to be vertically and horizontally segregated from motor traffic. This could be by planters or raised grass buffers. This is the only way to prevent the persistent illegal parking here. Examples given under General Feedback above of how this small 50mm kerb does not address this issue.
- The right turn filter into the Beacon car park is an unnecessary luxury for the convenience of a small number of drivers. There are roughly 300 car parking spaces under the Beacon. It should be removed in order to narrow the road width and allocate space to segregating the cycle track in such a way that drivers cannot drive or park on it. Additionally, planning permission granted under application 09A/0175 required the Beacon Hospital to install bollards to prevent drivers making right turn movements into and out of the car park from Blackthorn Road.

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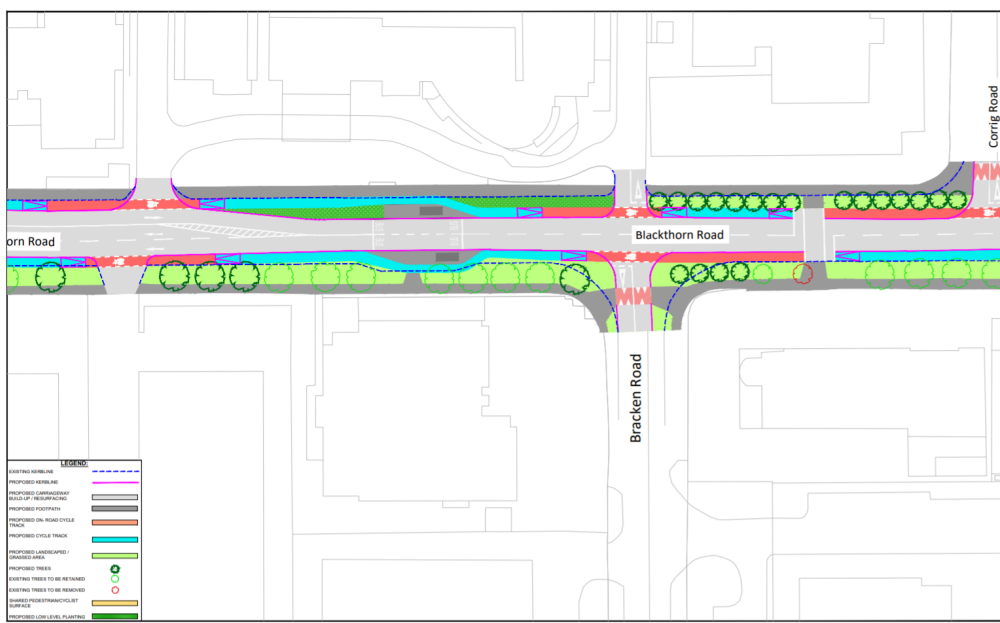
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- There should be only one left turning lane heading towards Drummartin Link Road. One should be removed in order to narrow the road width. Retaining the 2nd left-turning lane increases the crossing width for pedestrians crossing the road. Pedestrian and cyclist concerns here should be placed at a higher priority than “traffic capacity” of the junction which is clearly the reason for retaining the lanes.
- There should be a protected junction here, not a junction where pedestrians including hospital patients are expected to share space with a high volume of commuter cyclists. This is already a busy pedestrian crossing and will get busier with increased development in the area. The designers should consider the junction design being trialled by DLR engineers at the nearby Eden Park junction (Active School Travel project).

Drawing 6 feedback - Blackthorn Road and Bracken Road



- Many of the general issues raised above apply here too including the poor treatment of walking and cycling at side roads. In particular, the continuous footpaths and cycle tracks should not be interrupted in level by the entrances to car parks.

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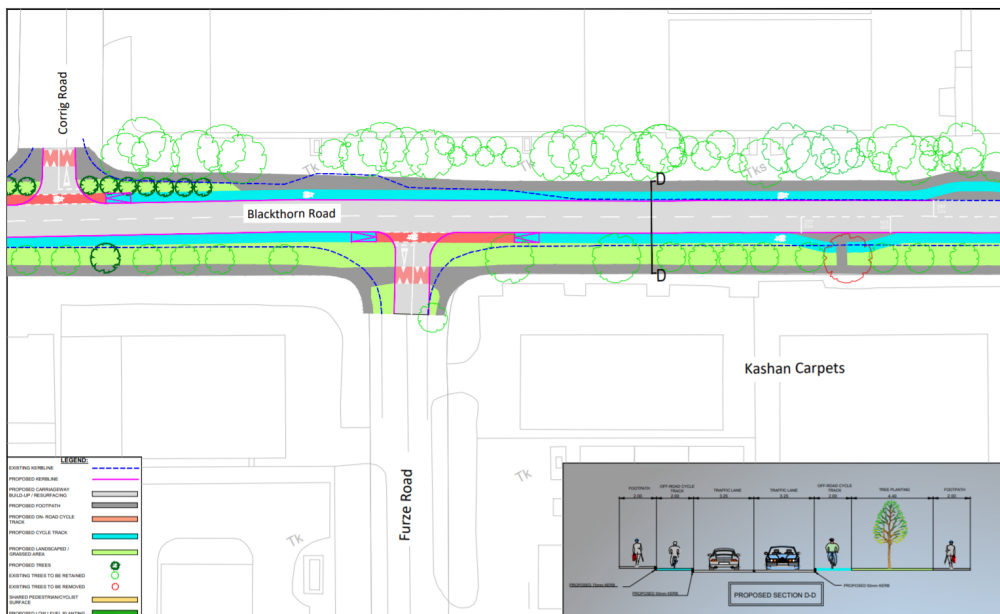
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- The cycle lane appears to narrow when 2 lanes are introduced approaching Blackthorn Drive. These 2 lanes should not start until after the 2 car park entrances to the left of Drawing 6.
- The location of the crossing isn't helpful for cyclists looking to turn right at Bracken Road coming from either direction. The crossing should be right next to the Bracken Road junction with a "sparrow crossing" where cyclists and pedestrians have separated spaces to cross but share lights. There should be a dedicated space for cyclists to wait that is not pedestrian space.
- A positive here is that trees are being retained and new trees are being planted.
- A positive here is the cycle track continuing around the back of the bus stops.
- The location of the bus stops are hard to understand. They should be close to the nearby pedestrian crossing. The current desire line will see pedestrians crossing the road without using the crossing as most demand for the bus is coming from the other direction (Beacon Hospital and Beacon South Quarter). The solution would be to move the crossing beside Bracken Road on the same side as the bus stops.

Drawing 7 feedback - Blackthorn Road and Furze Road



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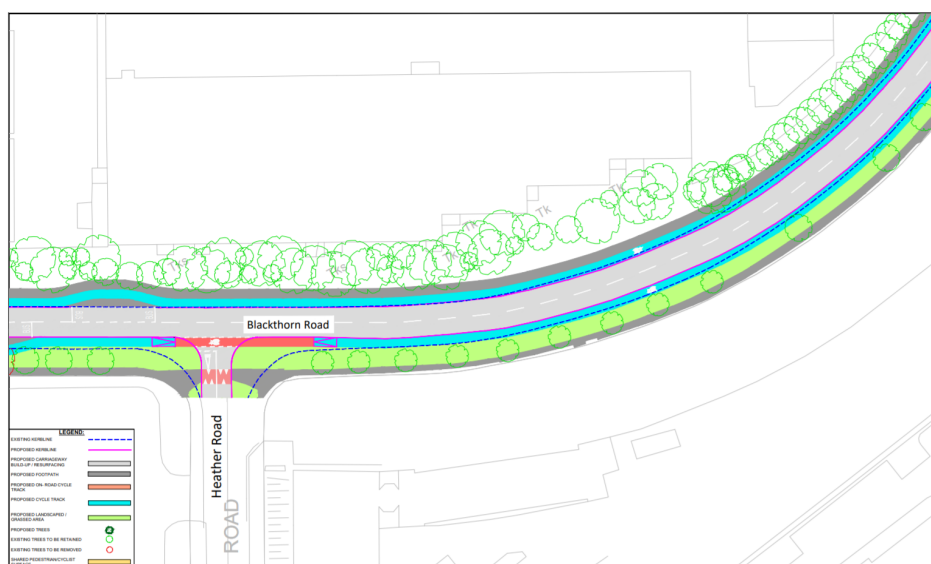
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The only new piece of feedback here is regarding the side roads which is already raised above.

Drawing 8 - Blackthorn Road and Heather Road



- Same as Drawing 7: side road treatment should be a continuous cycle track.
- This may be the location where the new ESB Link Road meets Blackthorn Road and should have been shown as part of the designs that are out to public consultation. This junction should be designed as a protected junction, or at least presented as one of the options.

Drawing 9 feedback - Blackthorn Road

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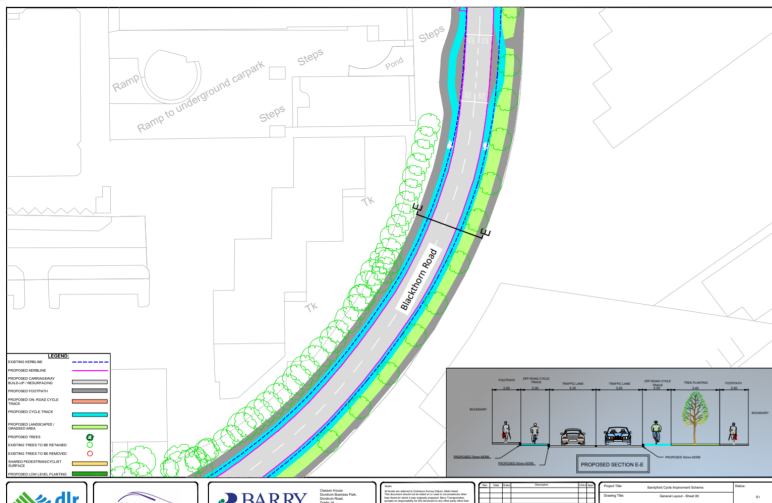
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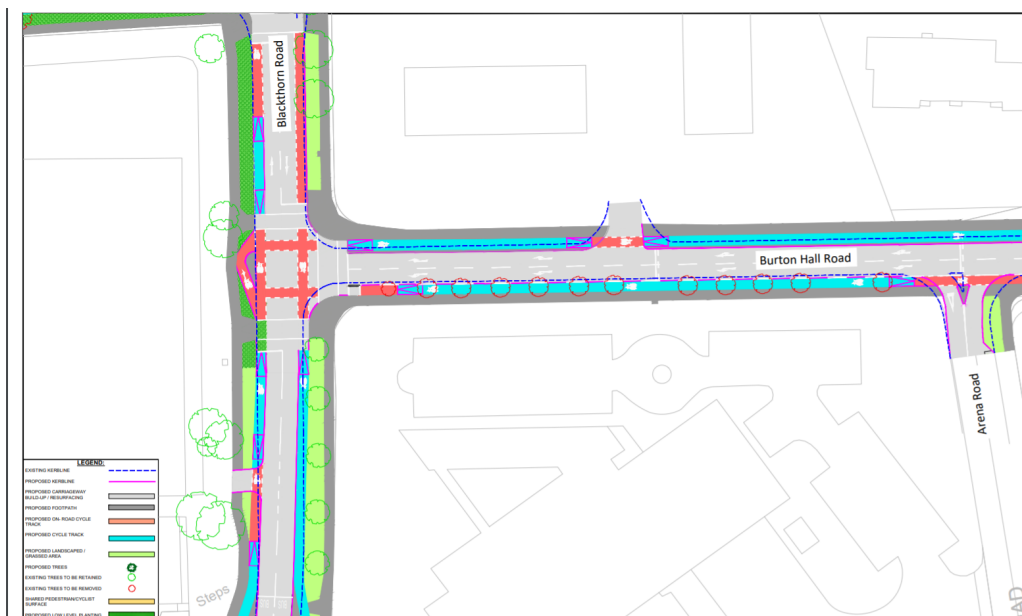
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As there is currently no parking or unloading demand on this section of road, the 50mm kerb is acceptable. It is positive to see that the carriageway will be narrowed and trees retained.

Drawing 10 - Blackthorn Road junction with Burton Hall Road



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- The crossings here would be a good upgrade for pedestrians with the extra crossing across Blackthorn Road. The lights should go green for pedestrians all at once here.
- It is disappointing to see the junction between Blackthorn Road and Burton Hall Road designed so as to give no protection to cyclists moving through the junction. This is an opportunity for a fully protected junction.
- A fully protected junction would allow cyclists to make additional movements when lights are red for their arm of the junction: Straight on Blackthorn Road towards Carmanhall Road, left from Blackthorn Road onto Burton Hall Road, left from Burton Hall Road onto Blackthorn Road.
- Removing 12 trees here is completely avoidable. There is a need to reduce traffic volumes and increase tree cover in Sandyford BD. This proposal to retain 2 lanes of traffic the whole length of Burton Hall Road goes against that. Retaining 2 lanes of traffic here will encourage higher speeds off-peak and be just as congested during peak as if a lane were to be removed. We must take brave decisions and have confidence in modal shift leading to a reduction in traffic volumes.
- The side road entrance into Arena Road still appears to be a high speed turn due to the kerb radii. This should be narrowed and straightened and a raised crossing provided for pedestrians. The proposed retention of a middle island at a side road crossing just encourages high speed turns from motorists and de-emphasises pedestrian priority.
- The entrance/exit into/from Sandyford Business Centre should be closed off to vehicular traffic as it prevents a safety hazard for cyclists travelling contra-flow as is one more unnecessary side road for pedestrians to cross. Sandyford Business Centre already has access/egress on Blackthorn Road. The property owner could be compensated somewhat but this should be minor in the overall scheme of the project.

Burton Hall Road (Drawings 11-12)

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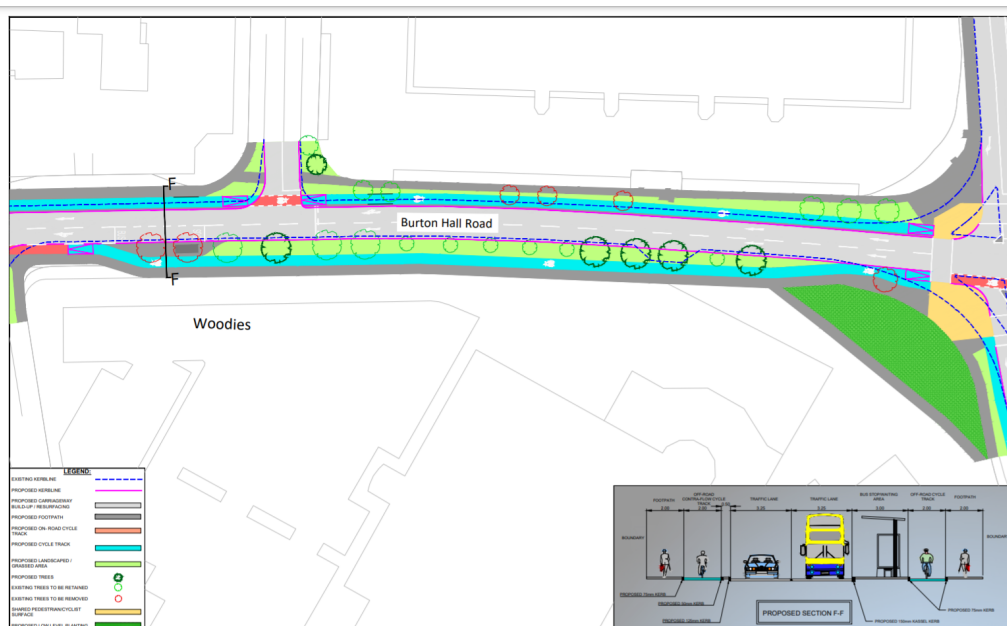


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Drawing 11 feedback - Burton Hall Road



- At Burton Hall Avenue: A contra-flow cycleway should not be turned into paint at a minor side road junction. It should remain raised to emphasise the priority of the straight-ahead (contra-flow) cyclist.
- The carriageway should be reduced to a single general traffic lane here. The further removal of trees here is completely unnecessary as detailed above.
- Some horizontal traffic calming, i.e. chicanes could be added here to ensure that drivers slow down on this straight road.

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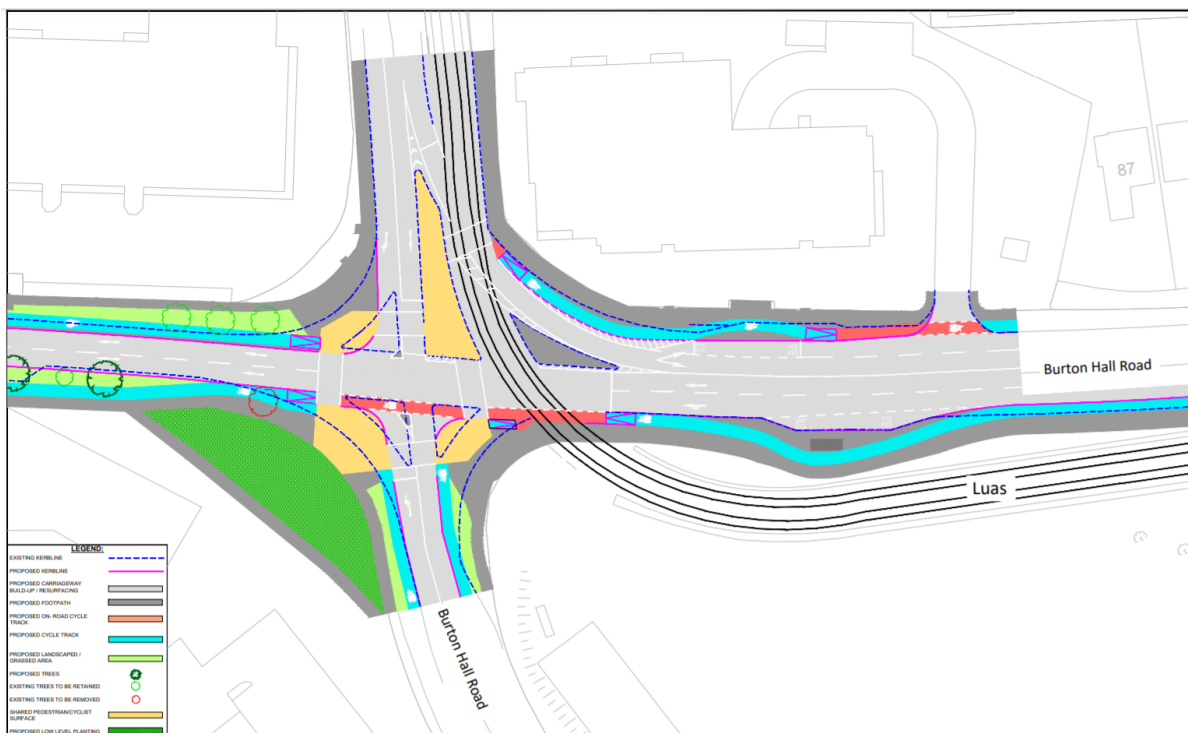


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Drawing 12 - Burton Hall Road/Blackthorn Avenue junction



I utterly reject the suggestion in the report that there are insurmountable constraints at this junction. The constraints are completely self-imposed by the planning/design decision to start with maximum motorist convenience and then fit everything else around that.

- This proposed junction design overall is safer than the current junction layout but still falls well short of what should be aspired to in 2021. The clear emphasis is on traffic volumes and capacity rather than road safety, modal shift, public transport or pollution reduction. The aspiration should be for a much more compact junction that offers protection to cyclists, shorter crossing distances for pedestrians and real priority given to public transport.
- Requiring some cyclists to use 3 crossing points shared with pedestrians to make a right-turning movement is completely unacceptable, increasing cyclist journey times and increasing the conflict between pedestrians and cyclists. Cyclists using the new contra-flow on Burton Hall Road and continuing straight will take a completely

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awkward route, as will pedestrians. This is a prime example of squeezing in active travel after making sure to keep the status quo of a vehicle-dominated junction.

- Ending cycle tracks on shared spaces is an anti-pedestrian and anti-cycling design feature. It has been advocated against by cycling groups and disability groups and should be discarded here.
- The junction should be changed to be a fully protected junction. Any left-turning traffic should be held on a red while cyclists and general traffic continue straight-ahead through the junction. Left-turning cyclists should have a “free left” at all arms of the junction, just yielding to crossing pedestrians.
- The large left-turn slip lane from Blackthorn Avenue to Burton Hall Rd should be removed. Instead, turn the proposed large traffic island into a short left turn lane. The removal of the slip lane will remove the major conflict point that currently exists between the Luas and car drivers. With 55m trams running at 4 minutes headway, the slip lane is actually completely useless in terms of traffic capacity anyway. The junction should not interact with the tracks whatsoever.
- In order to facilitate the extension of the cycle track along Blackthorn Avenue and the removal of the large left-slip turn along the Luas tracks, there should be a reduction to 2 general traffic lanes on Blackthorn Avenue. Cycle lane should continue straight from Blackthorn Avenue instead of mixing with pedestrians after crossing the Luas tracks. This will enable it to tie in better with the reconfiguration of the Burton Hall Road junction that I am proposing. The arrangement below on Blackthorn Avenue is a deprioritisation of cycling:



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- A contra-flow cycle track on Blackthorn Avenue should be provided for. Even if it can't be provided fully at this stage, space should be provided for it to be installed in future.
- Bus priority measures at the junction should be explored.
- The use of bus stop layby on Burton Hall Road will just result in the bus struggling to pull out into traffic. Buses should stop here in line with the traffic lane and there should be a yellow box to ensure that the bus can pull out into the straight ahead lane with ease despite traffic congestion.

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