

Dublin Climate Change Action Plan 2019 – 2024 Public Consultation
by electronic submission

Date: 22nd March 2019
Ref: 18.151
Re: Dublin Climate Change Action Plan 2019-2024
Subject: Submission on behalf of Sandyford Business District

Roughan & O'Donovan has prepared this submission to Dun Laoghaire-Rathdown County Council on behalf of the Sandyford Business Improvement District Company [SBID]. The SBID is broadly supportive of the Climate Change Action Plan, and has a particular interest in a number of the proposed Actions. Our submission addresses each of these in turn, along with making general recommendations to ensure that the actions of the plan are implemented in a timely manner.

We note the following [selected] specific actions proposed by Dún Laoghaire – Rathdown County Council:

- 1) Develop and extend cycle network;
- 2) Develop and expand the County walking network;
- 3) Expand Electric Vehicle Network in the County
- 4) Expand bus network in the County;
- 5) Develop County Bike Sharing Scheme;
- 6) Implement Public Open Space and Parks Strategy;
- 7) Cycle parking in public realm;
- 8) 30km/hr speed limits;

Specific Recommendations

A. Develop and Extend Cycle Network

Sandyford Business District houses the most significant working population in the Dún Laoghaire – Rathdown area. This offers the single largest opportunity in the County to increase the uptake of sustainable transport patterns. However, the uptake of cycling in the district lags far behind the uptake to and from Dublin City Centre, due in part to the remaining shortcomings of cycling facilities within and adjacent to the District itself. SBID has prepared drawings highlighting deficiencies in the cycling network in the Sandyford Business District Area.

Considerable additions have been made to the local cycle route network in recent years, such as through the junction of Leopardstown Road and Brewery Road. All that remains is provision of cycle tracks along Burton Hall Road and Blackthorn Road to complete the local network with the business district. On the approach routes to the area the lack of cycling facilities and a

footpath from the Stepside area and Kilgobbin Road is a major obstacle to access from this major nearby residential area.

Recommendation No. 1: Dún Laoghaire – Rathdown County Council should immediately advance plans to address the deficits in the cycling infrastructure in Sandyford Business District highlighted on maps provided by the SBID and appended to this submission. This action should provide significant encouragement for people to switch to cycling for access to the SBD.

B. Develop and Expand the County Walking Network

SBID is fully supportive of this proposed Action. However, in addition to developing new routes, there is an urgent need to address deficiencies along existing footpaths. There are numerous deficits in existing pedestrian circulation provision around the County, including specifically throughout the Sandyford Business District. These issues are most acute for the Mobility Impaired and Disabled [MID]. Sandyford Business District is not currently MID friendly.

Recommendation No. 2: Dún Laoghaire – Rathdown County Council should commission a comprehensive County-wide pedestrian facility audit, in particular focussing on areas of highest population density such as Sandyford Business District. The Audit should consider the accessibility, usability and attractiveness of pedestrian facilities, and should include recommendations for enhancements, widening, and other interventions as required. In general the existing footpaths are only 1.5m wide which falls far below the minimum requirements of the *Design Manual for Urban Roads and Streets*. There are generous grass verges along the local streets in the SBD that can accommodate footpath widening at little cost.

Junction crossings on the numerous side streets and entrances to premises are not suited for pedestrians with wide corners that form long exposed bell-mouths to be crossed. In most cases there are no dished-kerbs which poses a major obstacle for people in wheelchairs. On some side streets there is a footpath on side only, or gaps that require people to walk on the grass verges.

The Audit should also consider the waiting times for pedestrians crossing major junctions and should review these in the context of the hierarchy of user prioritisation described in the *Design Manual for Urban Roads and Streets*¹. In some cases pedestrians are required to cross the road in two stages, such as from the southern side of Burton Hall Road to the western side of Blackthorn Road. The absence of a single direct crossing results in considerable delay for pedestrians as they must wait through two signal cycles. This leads to risk-taking by some pedestrian who jay walk across the road rather than wait so long. The recommendations of this Audit should be implemented as a matter of priority to support sustainable transport patterns, and to promote inclusive mobility.

C. Expand Electric Vehicle Network in the County

SBID is fully supportive of this proposed Action. Sandyford Business District houses a significant concentration of workers, but a very small number of electric vehicle charging points.

Recommendation No. 3: Dún Laoghaire – Rathdown County Council should work with ESB Networks to increase the number of charging points for electric vehicles within Sandyford Business District. This will require careful selection of suitable, accessible locations, and

¹ <https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload%2C32669%2Cen.pdf> Page 28

consideration of the displacement impacts associated with the removal of any existing car parking spaces.

D. Expand Bus Network in the County

This Action is urgently required, and long overdue. Sandyford Business District houses a significant employment population but is relatively inaccessible by public transport from the east and west. The Luas line connects the Business District to the City Centre and to Cherrywood, but public transport connectivity in all other directions is poor. The lack of orbital connectivity in particular gives rise to unnecessary car journeys on the M50 and from the N11 direction, exacerbating traffic congestion in the area.

Recommendation No. 4: Dún Laoghaire – Rathdown County Council and the National Transport Authority should seek to prioritise improved public transport accessibility of Sandyford Business District, and shall investigate means of providing frequent, reliable bus services to and through the district, whether as part of the NTA's BusConnects programme, or otherwise.

Currently it appears that the first phase of BusConnects will focus exclusively on improvements to the radial routes towards the city, with orbital routes to follow later in the programme. While BusConnects proposes welcome additional orbital routes through the Sandyford area, there needs to be greater urgency given to the early delivery of these proposals. In addition the proposed frequency of 20 to 25 minutes for Orbital Route S8 from Dun Laoghaire and Tallaght is insufficient and needs to be improved to 10 to 15 minutes at peak if it is to offer an attractive alternative to the private car.

E. Develop County Bike Sharing Scheme

SBID is anxious that the "County" Bike Sharing Scheme should indeed be that, and not simply a local deployment around the town of Dún Laoghaire. Whilst the County is hilly, it is small, and the bike is the most appropriate means of intra-County journeys. The deployment of a true County-wide bike sharing scheme would facilitate intra-County work travel [to meetings etc] using public bikes, as well as increasing the accessibility of major public transport corridors (i.e. DART, Luas, N11/N31 Corridor) from other parts of the County.

Recommendation No. 5: Dún Laoghaire – Rathdown County Council should roll-out a County-wide Bike Sharing scheme, with a particular focus on major established employment zones, including Sandyford Business District. The Bike Sharing Scheme should also provide connectivity to major public transport corridors. Consideration should also be given to an e-scooter sharing scheme and car-sharing programmes.

F. Implement Public Open Space and Parks Strategy

There is an unfortunate lack of accessible, usable public open space in Sandyford Business District. This reduces the attractiveness of the area for business users, as well as limiting the amenity potential of the area for residents. This reduces the competitiveness of the Business District

Recommendation No. 6: Dún Laoghaire – Rathdown County Council should review the provision of public open space in Sandyford Business District, and should prepare a specific local Public Open Space and Parks Strategy for urgent implementation. The County Development Plan should be updated as required to reflect the need for increased public open

space in the Business District. The proposal to cover the Stillorgan Reservoir provides an opportunity to create a wonderful public amenity, and DLRCC should engage with Irish Water to advance this project so that it provides benefit for the surrounding area.

G. Cycle Parking in Public Spaces

There is an acute lack of safe and secure on-street bicycle parking in Sandyford Business District, resulting in bikes being locked to poles, public lighting columns, railings, etc.

Recommendation No. 7: Dún Laoghaire – Rathdown County Council should review the provision of safe and secure bicycle parking in Sandyford Business District, and should develop and augment it to reflect existing and anticipated demand. Bicycle parking should also be provided at all public open spaces.

H. 30km/hr speed limits

The SBID acknowledges that Sandyford must accommodate major through traffic routes, and that capacity and efficiency along these major corridors is important. However, there are many quiet linking streets throughout Sandyford Business District that could be made considerably more attractive for walking and cycling, if landscaping and traffic calming (horizontal rather than vertical) were sensitively implemented,

Recommendation No. 8: Dún Laoghaire – Rathdown County Council should review the linking streets in Sandyford Business District with a view to implementing a 30km/hr traffic environment through physical measures, including landscaping and horizontal deflections. Speed restrictions should not be implemented on the basis of signage alone or speed ramps.

General Recommendations

The Climate Change Action Plan for Dún Laoghaire – Rathdown includes over 80 Actions, and it will be difficult, if not impossible to implement all of these actions, without dedicated staffing and financial support.

Recommendation No. 9: Dún Laoghaire-Rathdown County Council should establish a dedicated office to oversee the implementation of this Plan, guided and supported by a Steering Board comprising Senior Management of the County Council. The dedicated office should have a dedicated budget, including a clear auditable breakdown of the budget assigned to each action in each year, and accountability protocols to encourage and ensure implementation.

Recommendation No. 10: Dún Laoghaire – Rathdown County Council’s dedicated Climate Change Action Office should liaise regularly with local business groups, including Sandyford Business Improvement District Company, to mobilise support for the implementation of the plan. Working in partnership, SBID will support the Council in implementing the Actions. This is consistent with the separately identified Actions for “Engagement with Citizens on new Sustainable Travel initiatives and schemes” and “Continue Environmental Awareness Campaigns to support public in their efforts to manage their resource use”.

SBID also highlights its particular interest in the following Actions:

- **Region-wide map of cycle routes and green networks to support walking and cycling**
SBID is fully supportive of this Action and can provide information already prepared on behalf of SBID to Dún Laoghaire – Rathdown County Council to assist in the development of it. The council previously published a *Cycle Network Map* in 2014 (of which copies were provided to local businesses in SBD), and this should be updated and publicised. That map will highlight how little additions have been made to the network in the past 5 years and could inform a fresh impetus towards completing the network in a reasonable timeframe. (There are also various errors on the map such as the indication of Carysfort Avenue in Blackrock, or Deansgrange Road as having cycling facilities, which should be corrected).

There is a need for direction signs to indicate routes through residential areas such as from Brewery Road through Farmleigh and Carysfort Downs towards Newtownpark, Balally to Drummartin at St. Olaf's School from Sandyford Road, or through Clonard to Ballinteer.

- **Facilitate the Small Business Innovation and Research Challenge for Climate Change Solutions.**
SBID will assist in mobilising support for this within Sandyford Business District.
- **Monitoring of Big Belly Bins in County**
SBID will support the Council in the roll-out and monitoring of Big Belly Bins in Sandyford Business District.
- **Continue upgrading public lighting to LEDs and Monitoring of Smart Lighting Trials in the County**
SBID will support the Council in the roll-out of more efficient lighting schemes in Sandyford Business District.

SBID considers that Sandyford Business District's population profile and demographics ideally positions the District to be an exemplar in implementing Actions to counter climate change, subject to the necessary administrative and financial support. SBID would welcome the opportunity for further engagement with Dún Laoghaire Rathdown County Council in this regard.

Please acknowledge receipt of this submission to cossec@sandyford.ie.

Yours faithfully,



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