December 4, 2020

FAO Mr Brendan O'Brien
Acting Executive Manager Traffic
Dublin City Council
Civic Offices
Wood Quay
Dublin 8

Dear Mr O'Brien,

# Subject: 1st Meeting of Strand Road Cycle Trial Consultative Forum via Zoom on 3rd December 2020

Thank you for the opportunity to provide you with the thoughts of Sandymount Avenue Residents Representatives. We support the principle of improved/safer cycling on our roads. However, as discussed we have three main areas of concern that we formally raised during the forum, (a comprehensive summary is attached to this letter).

- 1. Sandymount Ave expected 63% increase on existing traffic numbers.
- 2. **Congestion** closing a main artery to the North Side/Airport/M50 while giving inadequate thought to how smaller roads in Sandymount will accommodate the displaced 7,600 (COVID number over a 24hr period) northbound cars from Strand Road.
- 3. **Safety** the inherent risks associated with rerouting an additional 7,600 cars, busses, HGV's per day through narrow Victorian roads.

Specifically for **Sandymount Ave**, we want to stress the many traffic pinch points that currently exist along the Ave (ranging from 4.36m to 6.0m) that already restrict two way traffic flow. This will be greatly exacerbated by the increased traffic flow. To make the Avenue safe, we request

- That the existing No Right Turn off the Merion Road is maintained and strictly enforced.
- The installation of a proper controlled pedestrian crossing at the junction of Gilford Road.
- The introduction of speed control ramps at strategic locations.
- That the 30kM/h speed limit is identified on the road surface.
- The introduction of a filtered bus gate on Simmonscourt Road.
- The introduction of a "safe school" zone around Enable Ireland and the Rehab National Learning Centre.
- The retention of existing on road car parking spaces which are used by residents who have no facility for off-road parking and visitors to the Village.
- The re-installation of proper road markings on the Avenue following road resurfacing that completed in October, i.e. double yellow lines, official roadway car parking spaces, bus stop boxes, yellow boxes, white dotted lines in the middle of roadway etc.

Following the forum's first meeting, we are now submitting this document to DCC for their comments and feedback.

Yours sincerely,

Vincent Ryan <u>vincentryan2@eircom.net</u>
Maura Doyle <u>maura@mauradoyle.ie</u>
representing Sandymount Avenue Residents

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# 1. 63% traffic flow increase on Sandymount Avenue

## 1.1 63% upturn on existing traffic flow leading to additional congestion on a narrow road

DCC/NTA have presented their modelling on proposed diverted traffic flow. It identifies associated metrics on Northbound diverted traffic. Table 1. Below shows re-entered vehicle quantity projections with some additional speculative amounts (from pre-Covid numbers) that will occur in any one AM peak hour period.

Our present understanding is that between 102 -> 282 additional vehicles will flow along Sandymount Avenue <u>during any one AM peak hour representing a 63% upturn on existing traffic.</u>

Ref.	a	b	С	d	e	f	g
			2020 AM			Diff $d - c =$	Speculative
			flows			(pcu/h)	740 increase
			(pcu/h)			increase	using %
							Approx.
							amounts
1			Existing	Do	% Diff		
			Traffic	Something			
			flow				
			Reference				
2	Nutley Lane	Northbound	766	699	-9%	-67	
3	Merrion Rd (North of	Northbound	371	795	+114%	+424	
	Merrion Gate)						
4	Serpentine Ave	Northbound	359	490	+36%	+131	+356
5	Park Ave	Northbound	162	198	+22%	+36	+96
<mark>6</mark>	Sandymount Ave	Northbound	162	<mark>264</mark>	+63%	+102	+282
7	Sandymount Road	Northbound	488	597	+22%	+109	

Table. 1. Analysis of supplied current scenario v Proposed traffic flow scenario

**Note:** Using the speculative 740 (return to normal post-Covid) peak hour figure. % of northbound diverted traffic down Sandymount Avenue would give a 175% upturn on existing traffic.

## 1.2 Photographic evidence of narrow pinch point on Sandymount Avenue



**Photo 1.** Sandymount Ave outside house number 80 – view of number 18 bus travelling towards Merrion Road, Ballsbridge. Bus is overtaking parked cars – not much space here for opposing traffic flow. The barriers were down at the DART Station resulting in a reprieve interlude of traffic travelling the opposite way towards Sandymount Village.

## 1.3 Our request to make Sandymount Avenue safe

- a. That the existing No Right Turn off the Merion Road is maintained and strictly enforced.
- b. The installation of a proper controlled pedestrian crossing at the junction of Gilford Road.
- c. Introduction of speed control ramps at strategic locations.
- d. That the 30kM/h speed limit is identified on the road surface.
- e. The introduction of a filtered bus gate on Simmonscourt Road.
- f. The introduction of a "safe school" zone around Enable Ireland and the Rehab National Learning Centre.
- g. The retention of existing on road car parking spaces which are used by residents who have no facility for off-road parking and visitors to the Village.
- h. The re-installation of proper road markings on the Ave following road resurfacing that completed in October, i.e. double yellow lines, official roadway car parking spaces, bus stop boxes, yellow boxes, white dotted lines in the middle of roadway etc.

# 2. Congestion

Closing a main artery to the North Side/Airport/M50 while giving inadequate thought to how smaller roads in Sandymount will accommodate the displaced 7,600 (COVID number over a 24hr period) northbound cars from Strand Road

- 2.1 Congestion already occurs in many areas of Sandymount even without the addition of the proposed diverted 7,600 vehicles per day. We have identified several of these congestion points below.
  - Will DCC comment on how they propose to resolve these?

#### 2.2 Sandymount village, Park Avenue and Church Avenue

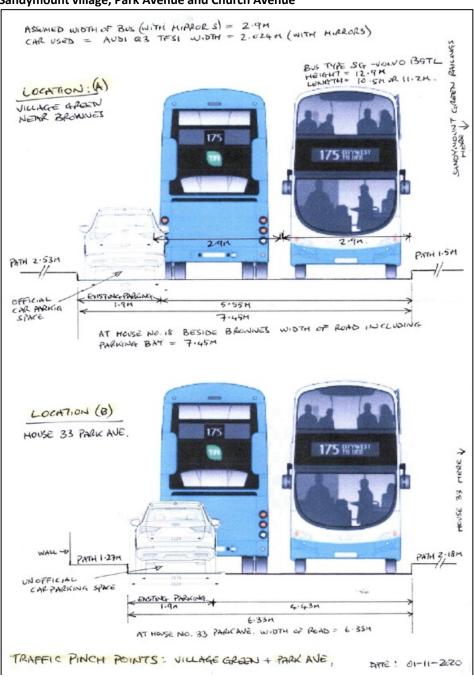


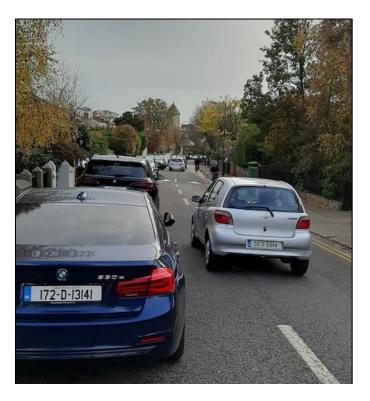
Fig. 1. Pinch point survey at two locations (A) Village Green and (B) Park Lane with buses & car superimposed on drawing that shows road widths, parking bays, path widths etc.



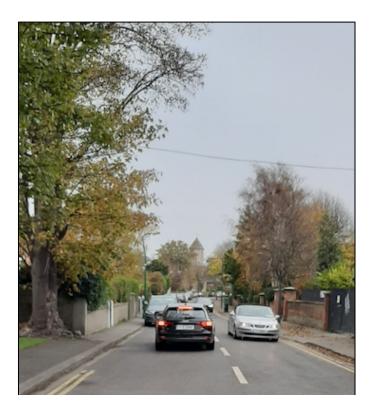
**Photo 2.** Number 18 bus attempting to squeeze pass cars parked in official parking bay near Brownes The Village Green.



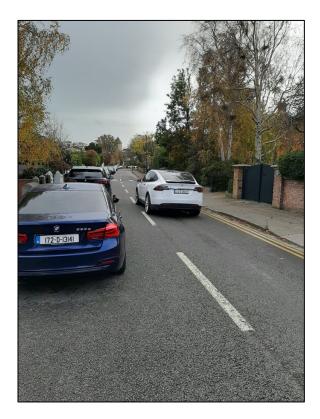
**Photo 3.** Reason why Number 18 was trying to squeeze pass – because of traffic flowing the opposite direction. Imagine if two opposing buses were attempting to pass one another. Path widths are 2.53m and 1.5m, road width here is 7.45m minus 1.9m (for official parking bay) leaving 5.55m for mobile traffic. – see Fig. 1. above under location (A).



**Photo 4.** One of many narrow roadway sections on Park Avenue looking towards St John's Church. Photo 4 shows several parked cars, mobile southbound traffic, two cyclists and several pedestrians travelling northbound towards Gilford Road. Path widths are 1.27m and 2.18m, road width is 6.3m. Imagine two buses or HGV vehicles attempting to pass one another here see Fig. 1. above under location (B).



**Photo 5.** Park Ave - view of opposing car traffic, one side queued due to parked cars, waiting to travel Southbound towards St John's Church



**Photo 6.** Park Ave - view of car travelling Southbound on wrong side of road. Drivers of cars exiting from house drives on right would be possibly looking in the opposite direction. Lot of other dangerous scenarios could be created here in the event of increased traffic flow.



**Photo 7.** Sandymount Ave outside house number 80 – view of number 18 bus travelling towards Merrion Road, Ballsbridge. Bus is overtaking parked cars – not much space here for opposing traffic flow. The barriers were down at the DART Station resulting in a reprieve interlude of traffic travelling the opposite way towards Sandymount Village.



**Photo 8.** Church Avenue will be the sole access point for vehicles to access Sean Moore Road for East Link Bridge. It is 100m long, 6m wide with parking on one side of the road.



**Photo 9.** Church Avenue towards Londonbridge Road. You can see the build up of traffic along Londonbridge Road as commuters try to access Sean Moore Road via Church Avenue.

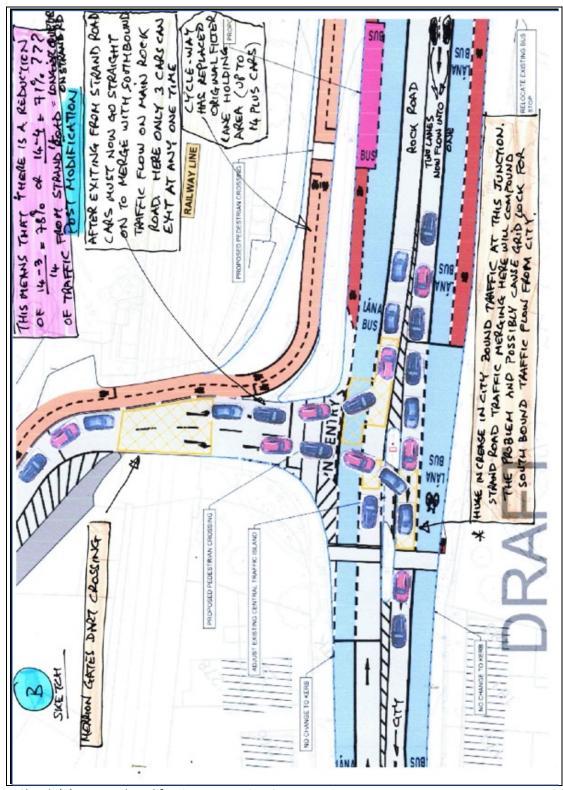
- Will DCC identify what methodology was used to access existing road pinch points and supply a list of the road pinch points
  - a. what methodology was used to access existing pinch points and associated safety?
  - b. supply a list of where the pinch points are located?
- 2.3 Gridlock the proposed modification of traffic flow at the Merrion Gates Railway Crossing Junction will reduce traffic flow between 70% -> 80%

Sketch (B) identifies what happens with planned future traffic flow

Reconfiguration of the junction will allow southbound cars exiting from Strand Road to split into two lanes.

One lane will drive straight-on for a short distance across a criss-cross yellow box and merge directly with the southbound traffic flow on the Rock Road. Even though there will be a new signalised traffic exit – at any one time only (3) released cars from Strand Road will be able to occupy this section of road. Traffic congestion and southbound flow moving speed at the junction will dictate how quickly the (3) cars will be replenished from the Strand Road traffic flow when the DART barriers are open.

The other lane will drive straight-on and turn right to merge with the Rock Road city bound traffic flow. We assume that some signalised arrangement will apply here.



Sketch (B) Proposed modifications at Merrion Gates Junction

Existing southbound traffic flow release at the Merrion Gates, is supplemented by a buffer zone area 66 + metres long with an ability to absorb (up to 14 left turning) additional cars.

With the proposed reconfigured junction this ability to absorb cars will be lost

- a. We believe that at specific times the DCC's proposed configuration will reduce traffic flow from the Strand Road between 71% <-> 78%. This will lead to longer queues on Strand Road and undermine the improvements DCC are trying to implements.
- **b.** Filtered traffic from the Strand Road heading city bound getting caught on the criss-cross yellow boxes will lead to grid-lock on the southbound traffic flow?
- Will DCC supply information on their own analysis on how the reconfigured junction will improve traffic flow rates on vehicles exiting Strand Road and prevent grid-lock situations?

#### 2.4 City bound traffic - narrow pinch point at controlled pedestrian crossing on Merrion Road

The drawing / sketch below is an enlarged section of DCC's Merrion Road / Rock Road General Arrangement Drawing DCC20009-NTA-GEO\_HV-00\_XX\_00-DR-KK-0103.

The marked location (A) at the controlled pedestrian crossing clearly shows a very narrow pinch point of 6.1 metres. The dimensional width of the blue coloured Bus Lane is 2.94 metres, the black dividing line measures 0.25 metres and the remaining vehicle lane measures 2.91 metres.

From observation of city bound traffic flow it will be impossible for a cyclist, a Bus and a car to accommodate this 6.1 metre pinch point together. Traffic flows very quickly at this point – if a cyclist is in the Bus Lane the Bus has to overtake the cyclist in the narrow 2.91 metre vehicle lane. The Bus entry into the vehicle lane causes city bound vehicles to dramatically slow down. A considerable number of cyclists are present at this pinch point through out the day. Combination of cyclists, Bus and cars / HGV's at this pinch point is not a random event – it happens many times in any hour.

The proposed addition of up to 740 diverted city bound vehicles plus right turning Strand Road diverted traffic at this narrow pinch point will dramatically compound the problem. It will lead to considerable delays in the traffic flow, and add significant dangers to vulnerable cyclists and pedestrians. It is on foot of this information that DCC should carry out a specific Quality / Safety audit at this pinch point and significantly modify their proposed general arrangement.

Below there are also three photos attached with (i) just a car, (ii) with just a Bus & (iii) with a cyclist and an overtaking Bus for inspection :



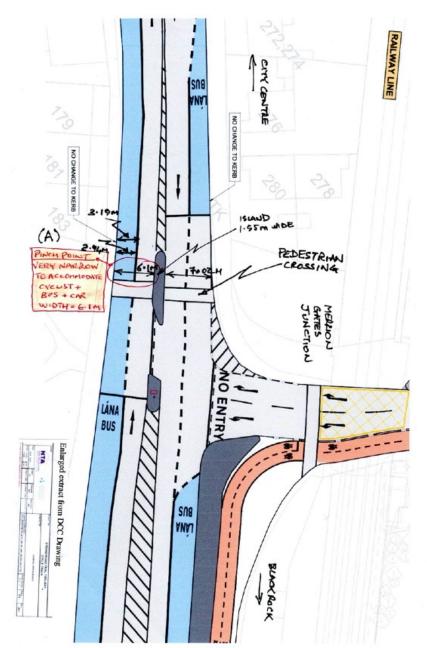
(i) Just a car



(ii) Just a Bus



(iii) with a cyclist and an overtaking Bus



The marked location (A) at the controlled pedestrian crossing clearly shows a very narrow pinch point of 6.1 metres. The dimensional width of the blue coloured Bus Lane is 2.94 metres, the black dividing line measures 0.25 metres and the remaining vehicle lane measures 2.91 metres.

Note: Even though DCC maintain that all their designs fall within acceptable standards and measurements it does not mean that all associated congestion issues have been properly addressed.

Cyclists and pedestrians are particularly vulnerable at this pinch point.

 Will DCC provide information on what mitigating measures they are proposing to install here to reduce the potential dangers to both vulnerable cyclists and pedestrians?

## 2.5 Diverting an estimated 2.8 million additional vehicles through the Sandymount Community

• Will DCC supply information on how they intend to integrate the impact of diverting an estimated 2.8 million additional vehicles through the Sandymount community, Sandymount's internal roads and transportation network, and Sandymount's urban planning under the guise of the proposed trial cycle-way?

#### Note: The calculation used is a best guess estimate on additional diverted traffic flow:

It does not take account of any traffic quantities from the existing pattern of daily traffic flow movements through-out Sandymount (both internal and external)

It assumes a return to pre-Covid northbound traffic flow figures during early 2021 when the majority of commuters will return to their normal work patterns.

Pre-Covid northbound traffic = (((6 hours of peak traffic \* 740 vehicles = 4440) + (18 hours of average traffic \* 370 vehicles = 6660) = 11,100) \* allow reduction factor of 30% = 7,770 vehicles per day) \* 365 days in a year = 2,836,050 vehicles per year). This figure could be less or more if you modify the 30% reduction factor.

Irrespective of what ever way you want to manipulate the figures, you are still talking about millions of additional vehicles traversing the road network of Sandymount per year. This will ultimately become a semi-permanent feature until you find an acceptable engineering solution to the planned long term cycle-way.

Millions of tonnes of additional weight causing substantial wear, tear and damage too the very fabric of Sandymount.

# 3. Safety - the inherent risks associated with rerouting and additional 7,600 cars and busses per day through narrow Victorian Roads

Even though DCC maintain that all their designs fall within acceptable standards and measurements it does not mean that all associated safety issues have been properly addressed.

We believe that conflicting Government, NTA and DCC ideologies are at the core of this problem. Political mobilisation under Covid-19 emergency legislation is instigating the introduction of the proposed cycle-way trial. Limited consideration is been given to local community participation in this far reaching event. Have any of the three bodies seriously examined the quality and safety impact that their decision will make at the local Sandymount coal-face?

- 3.1. We ask DCC how they will prevent and mitigate the safety and health impact of diverting thousands of additional vehicles through the dated internal narrow road network of Sandymount?
- 3.2. We ask DCC what interventions they will be installing to address and diminish the multiple risk factors identified below?
  - a. Basic traffic regulations and signage to manage traffic are essential instruments for enhancing road safety
  - b. Road safety is a multi-sectoral and public health issue all sectors, including health, need to be fully engaged in responsibility, activity and advocacy for road crash injury prevention
  - c. Inadequate or non-existent traffic signals and signage and lack of traffic management
  - d. Almost complete lack of infrastructure for pedestrians and cyclists
  - e. Forced sharing of narrow crowded roadways, streets and paths by both vehicles, pedestrians, animals, businesses, schools, nursing homes, disability services, churches and home owners
  - f. Where necessary, local knowledge needs to inform the implementation of local solutions
  - g. Give priority to diminished environmental conditions (pollution and noise)
- 3.3. We ask DCC to identify what are the safety and health risks that such an immediate diverted traffic imposition would have on the following (a-n) sections of the Sandymount community:
  - a. The <u>severely disabled students</u> attending the Enable Ireland School Facility (on Sandymount Avenue) and the Rehab Group, National Learning Network (on Newgrove Avenue) and their regular daily trips to the Village Green or shops, morning drop offs / evening collections.
  - b. The thousands of <u>parents</u> travelling by foot, car, cycle delivering and collecting their young children (in the majority of cases pushing prams buggies with babies inside) to/from: Scoil Mhuire, Lakeslands, Shellybanks Educate together Primary, Sandymount Park Educate Together Secondary School, Star of the Sea B.N.S., St. Matthews National School, Marian College.
  - c. <u>Younger students</u> travelling by foot, cycle attending to/from: Scoil Mhuire, Lakeslands, Shellybanks Educate together Primary, Sandymount Park Educate Together Secondary School, Star of the Sea B.N.S., St. Matthews National School, Marian College.
  - d. The large number of our <u>senior residents</u> who live in the following complexes: Margaretholme Sheltered Housing, Brabazon Trust, Tritonville Close, Ailesbury Private Nursing Home, Mount Tabor Care Centre & Nursing Home, Bethany House Sheltered Housing.
  - e. The <u>attendees</u> of our many churches in Sandymount: St. Mary's Star of the Sea, Christ Church Sandymount, St. John the Evangelist Sandymount, The Sikh Temple Sandymount.

- f. The huge number of <u>members and visitors</u> attending local Sports Clubs: Railway Union Sports Club, Pembroke Cricket Club, West Wood Club, Monkstown Rugby Club, YMCA Gym and Cricket Club, AVIVA Stadium (football, rugby, Concerts and Conferences hosting up to 80,000), RDS (Rugby and Concerts events hosting up to 18,500 during a match plus thousand more during Concerts).
- g. <u>Patients</u> attending our Sandymount Medical Centres, The Clinic Sandymount Green, Park Avenue Medical Centre, Sandymount Road Medical Centre.
- h. Our large population of <u>active seniors</u> who are out and about and travel daily to our local Village.
- i. Guests at our many local hotels.
- j. The large influx of <u>daily visitors</u>: who walk the prom, the strand, Sandymount's attractive network of (58) roads, Ringsend Nature Park, Walking Tour Groups, history buffs, foreign tourists, cyclists many of these use our three DART Stations.
- k. On our <u>Village based businesses</u> (60+) including Pubs, Supermarkets, Opticians, Restaurants, which are been serviced by thousands of daily customers.
- I. The thousands of 3<sup>rd</sup> Level college students who attend local Universities and Colleges, who live and work in Sandymount.
- m. The <u>tens of thousands</u> of remaining Sandymounter's going about their every day life in one of the oldest suburbs of Dublin.
- n. The safety of both <u>local and visiting cyclists</u> who peddle around Sandymount's narrow network of roads.
- 3.4. We ask DCC to supply copies of any information gathered on the internal network of roads since the activation of the proposed cycle-way: not only assessing the affected internal road network, but the established impact that it will have on all of Sandymount ....
  - a. Please supply dated and signed Minutes of meetings where safety and health matters/issues were discussed on the implementation of the cycle-way and specifically the knock-on effect that will ensue for the rest of Sandymount.
  - b. Please supply dated and signed copies of any Quality and Safety audit documents used that log the on-site assessment of the knock-on impact.

Note: Quality Audits consist of a number of overlapping audits, as described in the Design Manual for Urban Roads and Streets (Ireland) and the Manual for Streets (UK). They cover the following combination:

- Road Safety Audit
- Non-motorised User Audit
- Access Audit
- Walking Audit
- Cycle Audit

A Quality Audit is not intended to pass or fail a design, rather it is intended as an assessment tool that highlights the strengths and weaknesses of a design and a documented process of how decisions were made.

- 3.5. We ask DCC to identify what type of safety issue would be considered serious and threatening to the public?
- 3.6. We ask DCC to supply a list of items that are considered necessary to offset any perceived knock-on safety and health issues.
  - a. Against each item / issue that was considered what decision was made by DCC to either; do nothing; install additional equipment to overcome serious safety issues; state what other decisions were made.
- 3.7. We believe that our fundamental rights to fair procedures under the Irish Constitution are been eroded not by the installation of a proposed trial cycle-way, but by the hidden knock-on effect it will have on Sandymount and its environs. Specifically in the area of Safety and Health that will ensue. It should not be left to our community to have to fight against changes that are being made to our existing safety regime, our health and the huge change of lifestyle etc. that this cycle-way in its present configuration will bring to Sandymount. These changes will be caused by diverting up to an additional 740 per peak hour(s) of northbound vehicles (with estimates totalling an additional 2.8 million vehicles per year) traversing through the internal dated and narrow road network of Sandymount and its environs.
- 3.8. **DCC** is responsible for: the upkeep and maintenance of Sandymount and the services which they provide. DCC have a duty of care to members of the public to ensure that their health and safety is a priority. In order to do this, DCC are expected to carry out frequent assessments of the services that they provide to help them identify and eliminate hazards which could potentially lead to an accident in a public place. It is also DCC's responsibility to make people aware of these risks and hazards as this could reduce the risk of an accident occurring. Temporary installations like cycle-ways and any resulting secondary knock-on effect should be also treated in exactly the same way.

The only knock-on reference mentioned by the DCC in one of their earlier Slideshows was:

'The trial arrangement has major benefits for Strand Rd, Ringsend and Irishtown with the reduction in traffic'?

'The concerns regarding additional traffic in Sandymount have been well flagged and will be monitored carefully'?

- Will DCC supply us with additional information, as to what these two DCC statements mean specifically under 'benefits' and 'monitored carefully'?
- 3.9. When it comes to any challenging threats to the continued safety, health and security of our residents and property we believe that DCC (and other persons making decisions affecting Sandymount) must apply the following two rules.
  - a. The person(s) making the decision that affects Sandymount should not be biased or appear to be biased.
  - b. Sandymount through the forum must be given an adequate opportunity to present our case. We must be informed of the matter and we must be given a chance to comment on the material put forward by DCC.

#### 3.10. Installation status of the Sandymount Flood Defence system

Resulting from global climate change and closer Irish flood events, we are deeply concerned on the imminent impact that a catastrophic life changing sea flooding event will have on Sandymount. Again we point this out, because of the resulting safety and health impact it would have, not only for Sandymount but on all surrounding areas.

Presently home owners cannot secure flood insurance because in the Insurance Companies estimation Sandymount is sitting on a flood plain.



Figure 3-8: Extract from the Dublin City Council SFRA Flood Zone Map

Figure 3-8 above shows the extent of projected tidal flooding within Sandymount. On foot of this information we urge <u>DCC</u> to prioritise and complete their designed Flood Defence System ahead of any non critical temporary cycle-way project?

• Will DCC reply on the installation status of the Sandymount Flood Defence system

#### 3.11. DCC state that high-level aims are at the heart of this Dublin City Covid-19 Mobility Programme.

- a. To ensure safe access to and movement within Dublin City for all users;
- b. provide sufficient movement capacity to cater for the changed travel patterns; and
- c. To support the economic recovery of the city and the region.

These high-level aims have been translated into transport-specific objectives as follows:

- i. To improve pedestrian safety through the provision of additional space for movement and enhanced pedestrian areas;
- ii. To enable more people to cycle by providing safer cycling facilities;
- iii. To provide additional space at many bus stops in order to facilitate social distancing while waiting;

With one exception we have not seen any other evidence on any of the identified ideals being implemented on diverted traffic flows within the Sandymount inner network of dated narrow roads. In fact every element lacks in the provision of enhanced safety for residents within Sandymount Village and its environs.

- Will DCC expand on the ideals and the objectives associated with what is planned for Sandymount's safety and health?
- Will DCC identify what happens to existing traffic flow (vehicles, pedestrians, cyclists etc.) to ensure that the trial can be successful?

## 3.12. Extracts from DCC's Transport Planning Section

- a. The Transportation Planning Section through its ongoing work ensures that the design of all new developments, masterplans, local area plans and SDZs place the pedestrian at the top of the movement hierarchy as per national regional and city policy.
- b. The Promotion team works in partnership with Green Schools to address barriers identified by children to walking to school. Environment & Transportation Department proactively improves routes to several schools to include improved crossing facilities, signage and line markings. A new Walking and Cycling Promotion Officer was appointed in 2019.
- c. The Traffic Management Section continue to prioritise pedestrians and have installed numerous additional pedestrian crossings in 2019. Over the last 12 months at the majority of pedestrian crossings, longer amber man times have been introduced to ensure that the needs of the aging population are also respected.

## Finally, will DCC supply

- Their Transportation Planning Sections design documentation associated with Sandymount's diverted traffic,
- ii. Evidence of discussions held with the many vulnerable institutions based within Sandymount, identified in item 3.3 above.
- iii. Regarding the two new Village pedestrian crossings which were overdue and are now been installed what additional pedestrian crossings on other diverted traffic routes are planned to be installed and where?

#### Notes:

- 1. Presently we feel that workers are offered better protection on health and safety under the 'Safety, Health and welfare at Work Act' than what the Sandymount Community is been offered under this proposed cycle-way trial.
- 2. Everybody is focused on how wild life has to be treated in the Dublin Bay Biosphere which is a home to many rare and important species and of course we understand their natural importance. And strangely, the species of Sandymounter's are expected to absorb perceived unnatural changes to their health, safety, congestion, danger, pollution, noise, with no obvious sign of the long overdue flood defence installation, and traffic chaos etc.
- 3. We do not want anybody to have to deal with fatalities or serious accidents. So let us reexamine some of the obvious safety issues at the start.
- 4. Review Dept. of Transport's 'Traffic Management Guidelines' published on 6<sup>th</sup> Sept 2019.