



Mr Owen Keegan  
Chief Executive Officer  
Dublin City Council

9 November 2020

Dear Mr Keegan

We are in receipt of Hugh Creegan's letter of Friday the 6th November 2020 to DCC stating that the STC Alternative Proposal for a 2 way cycle path on Strand Road (maintaining 2 way traffic) has been rejected both by DCC as the local authority and by the NTA as funder for the project. This is obviously disappointing given the concerns of hundreds of residents of Sandymount/Ballsbridge as to the effect the displaced traffic will have on the urban village and the narrow residential streets.

We wish to reiterate that we are an extremely Green Community that support cycling but not at the expense of the ruination of Sandymount Village and the protection of people who already cycle within it, particularly children. This was the rationale behind us as a group in producing our alternative proposal. We do not have an obligation to produce such a proposal but in view of the failure by DCC and the NTA to do so we felt obligated (in an effort to protect our village and our neighbourhood), to do so. It is bewildering in the extreme and extremely frustrating that given the budget that is available to the NTA that it does not have the courage to go the distance and fund the proper S2S which has been debated since the advent of the Millennium. In the 2015 NTA commissioned report by Roughan O'Donovan Engineers, ROD concluded as below:

*"Diversion of through traffic from Strand Road would have significant adverse impacts for strategic traffic network in the south-eastern area of Dublin City:*

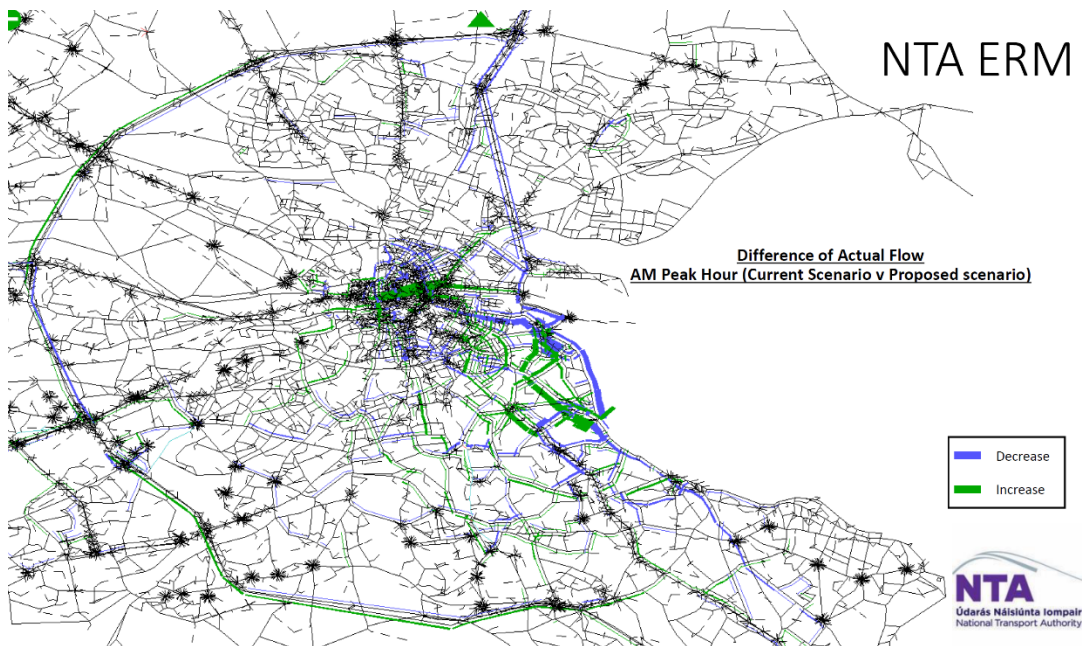
- a) The R131 Regional Route along Strand Road is one of two key access routes serving Dublin Port, with the Dublin Tunnel being the equivalent route from the northern direction;*
- b) Diversion of through traffic from Sandymount to Ballsbridge would have adverse implications for the environment in an important and vibrant employment and mixed-use inner suburb of the city;*
- c) Traffic toward the East Link Bridge would be diverted through the Irishtown and Sandymount residential areas;*
- d) Additional traffic pressure on the Merrion Road could present difficulties for the provision of additional capacity and priority for public transport and cyclists on that main radial route to the city centre.*

***In conclusion, it is unlikely that the traffic impacts of this option would be considered acceptable or proportionate for the objective of this cycleway project."***

We would like you to reply to the following questions as a matter of urgency:

1. What has changed since 2015 for the NTA to now apparently discard the advice of its own experts in the area particularly given that Minister Ryan has informed us that these measures do not relate to Covid 19?

2. Under what legislation/regulations are these major infrastructural changes being implemented? Are such matters not required to be referred to An Bord Pleanala?
3. What Environmental assessments have been carried out prior to the publication of this plan if any? Please furnish copies of these forthwith.
4. Do you consider the online consultation as carried out by DCC before any traffic modelling was carried out, to be fair and balanced given that the parties submitting comments had no idea that traffic on the Merrion Road would increase by 114%, Sandymount Avenue by 63% and Serpentine Avenue by 36% to mention but a few streets? The map below demonstrates that the traffic displacement will affect the entire South East Area and is real and substantive. There is no environmental or social justice in this proposal.



5. Please furnish now, for consideration by this group's independent traffic consultant, details of the **objective criteria** that the NTA propose to utilise to measure success or failure. **These need to be clear, objective and transparent.**
6. Have DCC/NTA completed its consultations with all the emergency services and Dublin Bus in relation to these proposed changes and particularly the Gardai? Please furnish copies.
7. What is the cost of carrying out the measures for the trial and how much will it cost to re-instate if the trial is deemed a failure using the objective agreed criteria?
8. Why is DCC introducing such a divisive solution, which directly impacts communities introducing congestion and delays which contradicts the Green Party Policies? The stated aims of DCC is to build sustainable communities and improve quality of life. Nothing in this proposal upholds those principles.
9. If DCC trial goes ahead during Covid-19 Pandemic Lockdown 2.0 the traffic data and experience will not reflective or accurate of pre Covid traffic volumes. Can you confirm that DCC will monitor the Cycling usage vs the Traffic encountered across all the streets highlighted in its report that are impacted by the proposal?

10. There are several planned night time Port Tunnel closures every month for maintenance resulting in HGVs going to and from the Port from the N11 using Strand Road as part of their access route. Less often the M50 is unavailable due to nocturnal maintenance. Occasionally the Port Tunnel and/or M50 is/are closed due to an emergency and the HGV cordon is suspended. In any of circumstances outlined above, how do HGVs access the Port/Port Tunnel with the Strand Road northbound lane unavailable? Navigating the narrow streets of Sandymount seems the quickest solution.
11. Page 15/16 of DCC Oct 5th report deals with permitted HGVs within the cordon area. Please explain how are HGVs are to access Strand Road (a DCC designated HGV route 2007) during the trial given that Merrion Gates is a cordon exit only point during the trial.
12. Does the trial require changes to existing on street parking availability on Park Avenue? If so, what are they and has the accessibility and sustainability of the long established and very busy sports clubs based on Park Ave been taken into consideration?
13. Do you agree that the DCC document online for comment was flawed as regards Beach Road as the relevant NTA map showed it as the route for the no.18 bus and the reason the proposal maintained two traffic on Beach Road? This basic error tainted local informed residents' opinion of the entire proposal. Councillors were advised of the error at briefing meeting on 18/19/20th August. Extraordinarily this error was never corrected online resulting in the public registering an opinion based on misinformation. On page 21 of DCC document of October 5th reviewing the public consultation, intent to make Beach Road one way is declared which if implemented radically changes the entire proposal. This in conjunction with the fact that the public were also not in possession any traffic modelling as referred to above clearly makes the consultation totally flawed and not fit for use. Please confirm that a proper constituted consultation will take now take place.

We await hearing from you as a matter of urgency

STC Community Group



[www.sandymountcycleforall.ie](http://www.sandymountcycleforall.ie)



[stcsandymount@gmail.com](mailto:stcsandymount@gmail.com)



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