

Council Policy Document on:

The Mobility and Management of Heavy Goods Vehicles (HGV's) on South Dublin County Road Network

Introduction

The South Dublin County Council (SDCC) area is an integral part of the Dublin Metropolitan area. Dublin competes with other European cities for inward investment and the role of Dublin as an economic entity is of central importance to the Irish economy.

SDCC aims to contribute to the collective strength of the Dublin city-region and to provide for the future wellbeing of the residents of the County by facilitating economic development and the growth of employment opportunities in all sectors in accordance with the principles of sustainable development.

There are more than 6,000 businesses in South Dublin County, including 11 of Ireland's top 100 companies, located in more than 80 business parks and industrial estates. There are also three main Town Centres and a range of district and local centres and retail parks with a variety of retail, service and employment functions. In 2011, there were more than 106,000 people employed in the SDCC area, although this had fallen by 11% from a peak of nearly 120,000 people in 2006.

Future economic and employment growth will be based on the ongoing success of technology based manufacturing and a greater shift towards higher value-added exportable goods and services. In order to both support existing employment and to encourage future growth, it is necessary to ensure the safe, easy and rapid movement of raw materials and finished goods.

Given that the main road network in the County has evolved over many years and that the location and standard of through road varies significantly, there are circumstances where the movement of goods and materials may conflict with the needs of other road users and in particular vulnerable road users such as pedestrians and cyclists.

Where such a conflict exists, there is a need to strike a balance that ensures that the needs of all road users can most appropriately be met, up to and including a ban on the movement of certain goods vehicles, if considered necessary.

Whilst policy cannot account for all possible circumstances, clarity of policy in relation to the movement of goods vehicles and in particular HGVs on the South Dublin County road network, would assist in considering the review of existing and future application of goods vehicle bans and restrictions in the County.

Existing Strategic Road Network and Pattern of Commercial Activity

The existing strategic road network in the County is focussed on a limited number of key roads, with all of the major commercial areas of the County located adjacent to or within a short driving distance (2km or so) of at least one such road, and are:-

North-South

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- 1) M50:- Fingal-DLRCC areas with 5 no. junctions at N4 / N7/ Ballymount / N81 / Scholarstown
- 2) R113 Fonthill - Belgard - Old Bawn – Killinenny – Scholarstown - Taylors Lane - Grange Road
- 3) R136:- Grange Castle Road, Cheeverstown Road (N4-N7-N81)
- 4) R120:- Lucan-Newcastle-Rathcoole Road

The northern section of the R136 also has an existing HGV movement restriction.

East-West

- 5) N4:- Palmerston/DCC-KCC
- 6) N7:- M50-KCC
- 7) N81:- Templeogue/DCC-KCC

Cross county

- 8) R110:- Naas Road (from M50-Drimnagh & Long Mile Roads)
- 9) R112:- St Peters-Templeville-Dodder Park Roads
- 10) R114:- Brittas - Bohernabreena-Firhouse-Butterfield Ave-Rathfarnham Roads
- 11) R115:- Stocking Lane-Ballyboden-Willbrook-Roads
- 12) R134:- Nangor-New Nangor Roads
- 13) Wainsfort-Cypress Grove-Ballyroan Roads
- 14) Greenhills Road
- 15) Citywest Road (N7-N81)
- 16) Bhóthair Katharine Tynan (Embankment Road + extension)

The Southern section of the R114 also has an existing HGV movement restriction.

What these roads have in common is that they are through roads with the capacity to accommodate goods vehicles to serve commercial activity and future economic development within the County. They form the important links between commercial activity and the main elements of the strategic road network.

Commercial Activity

Commercial activity is concentrated in several major blocks of employment land, retail/services centres and minerals quarries located throughout the County, most of which are on or adjacent to the strategic road network. These are as follows:-

- 1) Fonthill-Liffey Valley:- Retail and Employment
- 2) Clondalkin-Cloverhill:- Employment, Services and Retail
- 3) New Nangor-Long Mile-Ballymount:- Employment and Retail
- 4) Profile Park-Grange Castle:- Employment

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- 5) Newcastle Greenogue-Rathcoole:- Employment
- 6) Citywest-Kingswood-Baldonnell:- Employment
- 7) Belgard Quarry:- Minerals extraction/employment
- 8) Tallaght-Cookstown-Airton-Greenhills:- Services, Retail and Employment

In addition to the above, there are many smaller outlying retail, service and employment centres and minerals quarries that also require HGV service access, including in particular, Lucan, Palmerston, Newcastle, Saggart, Templeogue, Firhouse and Rathfarnham.

The County Development Plan 2010-16 recognises that new development should be appropriately located in relation to the strategic road network. Policy EE5 relates to the Freight Industry and states:-

“It is the policy of the Council to encourage developments that are likely to generate significant levels of freight traffic to locate on appropriately zoned sites proximate to the existing County or National Road network”.

Assessment of Existing Network/Commercial Activity

It is generally accepted that the National Road elements of the Strategic Road network have the capacity to accommodate all types of HGV and there is no conflict with vulnerable road users.

The non-national road elements of the strategic road network are generally suitable for HGV traffic but will include locations where there may be conflict with vulnerable road users. This includes locations within or close to town, village or district centres or schools.

The notable exception to this is the northernmost section of the ORR, which although designed to accommodate HGVs, includes a restriction that dates back to the original consent process for the road, a decade ago.

Given the design speed of the road as constructed, the limited frontage access to the road and lack of suitable alternative routes, it is recommended that this restriction be reviewed. A review should consider existing levels of HGV use (for access), noise levels, traffic volumes, pedestrian and cyclist activity and potential design measures to mitigate any potential impacts of lifting the HGV restriction whilst not discouraging walking and cycling.

It is recommended that in the first instance, design measures should be considered that improve safety and safeguard pedestrians and cyclists, even if this means that vehicular traffic should be slowed to 30kph or less. It is further recommended that commercial vehicle restrictions and bans should be considered only as a last resort,

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and where a suitable alternative route exists. This is set out in the policy further below.

It is also recommended that as part of the analysis of any proposed HGV ban or restriction, that the commercial impact of such a ban on the economy of the County and /or Region be taken into account.

Design Manual for Urban Roads and Streets (DMURS)

In March 2013 the Department of Transport & Tourism published a new guidance document and issued a circular letter to all roads authorities that requires its implementation. The document is entitled Design Manual for Urban Roads and Streets (DMURS) and includes guidance and standards for the design of both existing and new roads and streets in built up areas specifically. It does not apply to roads with a speed limit of more than 60kph.

The DMURS document encourages a hierarchy of permeable, through routes for all forms of movement. Below the level of the M50/N4/N7 and the strategic regional routes like the R136, the South Dublin County Council strategic road network described above broadly equates with the Arterial and Link street level of the DMURS hierarchy. These are the major routes via which major centres/nodes are connected and the links between arterial streets and centres of activity.

In relation to HGVs and the Strategic Road network in urban areas, the DMURS manual requires designers to balance the movement function of roads/streets with the place context, recognising that urban roads can traverse many areas with very different characteristics.

In general, the guidance is that place status will be elevated where density and land use intensity are higher, where there are greater levels of pedestrian activity and where as a result, vehicular traffic may need to be calmed, using an appropriate package of design measures. Whilst this may be readily identifiable in most circumstances, there are situations where it may be necessary to undertake a process of analysis that identifies the characteristics of a place.

It is recommended that prior to consideration of any HGV ban or restriction, that such an analysis be undertaken in accordance with the DMURS manual, which would also consider the impact on likely alternative routes.

Situation with regard to existing weight restrictions:

In considering this policy South Dublin County has a total of 28 weight restrictions in force across the County (listed in appendix 2). It is necessary to review and update these restrictions in the light of regulatory changes within the context of prevailing

safety and commercial circumstances. As such both existing and proposed restrictions will require full consideration.

Since the introduction of the current restrictions there have been technical advances in the design of HGV's including the use of anti-lock brakes, traction control and improvements in driver aids and monitoring of driver behaviour which have lead to increased safety levels and reductions in accident statistics.

It is not good environmental practice to have long circuitous HGV routes through the County as this causes anxiety in relation to transportation costs within the business community.

To consider these matters a sub committee of both the Transportation SPC and the Planning and Economic Development SPC's was formed. The outcome of the committee's deliberations will lead to the development of a HGV mobility policy within the County.

This policy will have countywide implications and the application of weight restrictions on particular roads will require a consistent approach in the assessment of each case.

The work of the sub committee is also timely as the Council must now reconsider all existing weight restrictions in the County following the publication of amended regulation for weight restrictions which come into force in October 2013, (SI 332 of 2012). These regulations change the weight restriction regulations from one of vehicle weight (*unladen*) to that of *design gross vehicle weight* (i.e. carrying capacity) in accordance with EU requirements. This means that current 3 tonne limits currently in place will no longer apply.

The sub committee has met on a number of occasions and has reviewed the existing methodology for considering weight restrictions on particular roads and the proposals contained in S.I. 332 of 2012 Road Traffic (Traffic and Parking) (Amendment) (No.2) Regulations 2012.

The transition from un-laden weight to design gross vehicle weight as permitted in the regulations must be considered in the context of the existing signage arrangements. While no particular un-laden limit had been specified a three tonne limit was the norm and weight restrictions in the County were implemented on this basis. It should be noted that the un-laden weight is not a direct indicator of design gross vehicle weight.

Gross Vehicle Weight (GVW).

In order to consider a GVW restriction a first principles review of vehicles types was been prepared for the Committee below.

Vehicle Categorisation:

The Roads Safety Authority gives guidance in this regard with respect to vehicle dimensions and weight categories.

An appropriate criteria for categorising vehicles is also contained in the current EU and Irish regulations governing maximum authorised dimensions and driving licences categories. Vehicle manufacturers are aware of these categories and construct vehicles to these requirements.

The European Union, via Directive 96/53/EC, sets the maximum authorised dimensions in national and international traffic and the maximum authorised weights in international traffic. These dimensions include the maximum weight of 2, 3 and 4 axel vehicles.

Directive 2006/126/EC, on driving licences sets out license types and associated weight categories. This is a weight based license categorisation and each vehicle has a vehicle weight plate. There is good commonality and coordination between Driver license weight categories under the directive and the permissible design Gross Vehicle Weight restrictions that are assigned.

HGV drivers in complying with their vehicle categories will also be complying with a weight restriction. The driver license classes are standardised across Europe and vehicles classifications are compliant to specific license categories.

HGV Definitions:

A HGV is defined as large goods vehicle and is the European Union term for any truck with a gross combination mass (GCM) or gross vehicle weight (GVW) of over 3,500 kilograms. These vehicles are also known as heavy goods vehicle, medium goods vehicle, LGV and HGV), In the Ireland there are sub categories of B, C1 and C. Sub-category C1 is used for vehicles between 3,500 kilograms and 12,000 kilograms where a Category C1 vehicle has a trailer (cat C1+E) and C for all goods vehicles over 12,000 kilograms as defined in Directive 2001/116/EC. The term Medium goods vehicle is also used to refer to goods vehicles of between 3.5 and 7.5 tonnes which are also known as 'light goods vehicles' (LGV). Commercial carrier vehicles of gross vehicle weight under 3,500 kilograms are referred to Light commercial vehicles.

In summary,

Light Goods Vehicle (B) < 3500Kg or 3.5tonnes

Heavy (medium) Goods Vehicle (C1 or C1+E) 7500Kg or 3.5 tonnes (and 12000Kg / 12 tonnes with trailer)

Heavy Goods Vehicle (C) > 12000Kg or 12 tonnes

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This is relevant to the change envisaged by the new regulations which come into force in October. The 3 tonne limit can no longer apply.

Permitted Weight Restrictions:

The permitted GVW weight restrictions as contained in S.I. 332 of 2012 together with Vehicle license categories and typical vehicle types are shown below in Table A.


TABLE A

The permissible GVW weight restrictions in accordance with S.I. 332 2012	Equivalent drivers license categories	Typical vehicle allowed at each GVW restriction
3500kg	Yes, 3500kg	<p>Renault 'trafic' and 'master' vans, Ford Transit van, Mercedes sprinter, 3500kg</p> 
7500kg	Yes, 7500kg	<p>Large Mercedes van (7,490kg), small 2 axel trucks, 7,500kg</p> 

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The permissible GVW weight restrictions in accordance with S.I. 332 2012	Equivalent drivers license categories	Typical vehicle allowed at each GVW restriction
10000kg		<p>medium size 2 axel trucks, 10,000kg</p> 
12500kg	Yes, 12000kg	<p>12000kg = A 7500kg vehicle with trailer not exceeding 4500kg</p> 
18000kg		<p>2 axel trucks, 18,000kg – EU Max</p> 

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The permissible GVW weight restrictions in accordance with S.I. 332 2012	Equivalent drivers license categories	Typical vehicle allowed at each GVW restriction
26000kg		<p>3 axel trucks, 26,000kg – EU Max</p> 
32000kg		<p>4 axel trucks, 32,000kg – EU Max (as for three axel vehicle shown above- with chassis extended for second steering axel)</p>

In considering the design GVW restriction the height of the driver cab is an important consideration. Larger vehicle tend to have higher driver cabs with poorer close-in visibility as the vehicle height increases with larger axel and wheel arrangements at the maximum size.

The Council sought additional advice from the South Dublin Chamber of Commerce in relation to a particular location as well as the general issues associated with the change of regulation coming into force in the Autumn of 2013. This correspondence is also contained in Appendix 1 and is of interest in the context of the strategic nature of this policy development.

In order to draft a new policy with regard to HGV mobility or restriction it is necessary to examine the matter in the context of a road hierarchy.

Following a number of meetings the subcommittee have recommended the following policy to the two SPC for consideration and recommendation to the full Council.