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Cork County Council  
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Friday, 29 November 2013

## **Douglas LUTS Work Package 13 – Inchvale Road Cycle Link**

Dear Mr. O'Donoghue,

Thank you for referring the above application to An Taisce for comment.

This submission is being made through the work of the Cycling Coordinator position on behalf of An Taisce and Cyclist.ie, a new position funded under the European Cyclists' Federation Leadership (ECF) Programme 2013-14. See [www.ecf.com](http://www.ecf.com) for more information on the ECF.

We are strongly supportive of an overarching aim of making Cork City and County more bicycle friendly and increasing the numbers of utility trips made by bicycle.

We have examined this proposals in the context of the Douglas LUTS Final report (MVA Consultancy 2013).

## 1 – Douglas LUTS, the Inchvale Road area and 30kph

We note in particular the *Future Pedestrian and cycle network Proposals* as per Figure 10.3 (page 10.11 of the Douglas LUTS Final report) - and section 10.5.13 (page 10.14) “30Kph Zone (Transport Policy T11)” which reads:

It is recommended that a 30kph zone be implemented in Douglas Village (discussed further in section 10.9). This will lead to improved safety for pedestrians and cyclists in the village centre and will help to promote these sustainable modes of travel and promote Douglas as a destination. The 30kph zone, in conjunction with other traffic management implementations, will lead to a reduction in through traffic in the Village centre, thus freeing up additional road space for the safe movement of vulnerable road users.

We strongly support the proposals to introduce a 30kph speed limit in the village of Douglas but it strikes us that the zone is very small in terms of its geographical area. Given the proximity of the residential areas of Inchvale Road and adjacent streets to the schools, it would seem far preferable:

- (i) To have more extensive 30kph zones to include those residential areas with school-going children, and
- (ii) To increase the number of speed tables on these roads so as to keep speeds low.

Furthermore, from the point of view of providing a more consistently legible environment for all road users, surely it would be preferable *for all of Inchvale Road to be traffic calmed* – and to have a 30kph speed limit and to have cycle logos on it - so that drivers will expect to encounter cyclists all the way along it and not just along part of it? A large part of the problem with existing provision for cyclists is that there is too much of a mixture of different types of interventions, designed and constructed to varying standards. One minute a cyclist is understood to be a legitimate part of the traffic, the next minute he or she is on a dedicated cycle space and the next minute he or she is treated as a pedestrian on wheels!

So, with this proposed scheme cyclists will be transitioning over a short distance (moving from West to East) from being normal users of a partly traffic calmed residential road to using a two-way cycleway and then to using a shared pedestrian/cycle space which meets Inchvale Lane / Douglas Street West to form an unconventional junction.

## 2 – Complicated Manoeuvres

A right-turn manoeuvre for a cyclist turning *onto Douglas Street West* from the shared pedestrian – cyclist space would appear to be convoluted one. Similarly, cyclists coming along Donnybrook Hill – Douglas Street West from the South may end up going past the junction with Inchvale Road and then turn left into Inchvale Lane and then onto the shared ped/cyclist facility, rather than simply turning left at the main Donnybrook Hill / Inchvale Road junction.

In essence, the proposed design appears to be creating more complicated manoeuvres for cyclists than a design approach which prioritizes speed reduction more broadly. Moreover,

traffic going north along Donnybrook Hill-Douglas West may not expect to encounter cyclists emerging from the reconfigured junction. Similarly, school traffic will have to interact with users of the shared ped/cyclist facility.

We do acknowledge that there is a multiplicity of manoeuvres into and out of the school from various directions that the designers are looking to cater for, and see that there is an existing number of cycleways which ought to be connected further, but we strongly recommend that the designers re-examine Inchvale Road – which we note has “low traffic volumes” (page 3 of the Planning Application) – with a view to making this a low speed *and low traffic volume* child friendly environment over its whole length – not just the middle section of it!

Our overarching concern here is that proposed provision of the short-length of two-way cycle track and shared pedestrian / cyclist facility will complicate road user interactions at junctions and distract from a wider need to calm motorised traffic speeds on already lightly trafficked residential roads.

### 3 - Connectivity and Permeability

A short section of 3m wide "cycletrack to school" (on Drawing Number PL1302) is shown immediately North of the East-most speed table. Such a path makes sense if details are thought out well.

More generally we support the principle and proposals of making residential cul de sacs more permeable and understand that Cork Cycling Campaign commented positively on that proposal in their submission in March. Therefore, creating a direct pedestrian / cycle link to Westbrook Gardens (viewable here <https://maps.google.ie/maps?q=Douglas,+Cork&hl=en&ll=51.873243,-8.439517&spn=0.000156,0.000955&sll=53.32432,-6.251695&sspn=0.1702,0.488892&oq=douglas&hnear=Douglas,+County+Cork&t=h&z=20&layer=c&cbll=51.873243,-8.439517&panoid=CktvDhl7dQ5EDAPleO-aew&cbp=11,63.67,,0,5.66>) would allow for a more direct connection to the school.

This idea may, of course, generate resistance from residents but creating permeable neighbourhoods is a critical part of making urban and suburban areas pedestrian and cyclist friendly. See for example the National Cycle Policy Framework (Department of Transport 2009: pages 7, 15 and 16) and the Design Manual for Urban Roads and Streets (T. a. S. Department of Transport and Department of Environment 2013: pages 41-46)

### 4. Further Comments / Details

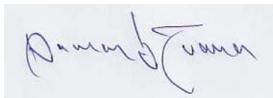
As in package 8, the use of the term "shared space", as applied to the part of Inchvale Road marked blue in the drawings, would seem to be incorrect as cyclists will be sharing *with motorists*, not with pedestrians. This is the default position given the bicycle's legal status as a vehicle! (See page 96 of the Design Manual for Urban Roads and Streets (T. a. S. Department of Transport and Department of Environment 2013)) for a discussion on shared surfaces and shared streets.)

## 5. Conclusion

An Taisce trusts that our commentary will assist Cork County Council in advancing an effective scheme.

I would be grateful if you could acknowledge receipt of this submission and advise us of any further decisions made in regard to this application.

Yours sincerely,



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## REFERENCES

Department of Transport (2009), 'National Cycle Policy Framework', (Department of Transport).  
Department of Transport, Tourism and Sport and Department of Environment, Community and Local Government (2013), 'Design Manual for Urban Roads and Streets'.  
MVA Consultancy (2013), 'Douglas Land Use & Transport Strategy (DLUTS) - DLUTS Final Report'.