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Douglas LUTS - Work Packages WP1, WP2 & WP11

Dear Peter,

I refer to the above Part VIII consultation processes.

This submission is being made through the work of the National Cycling Coordinator on behalf of An Taisce and Cyclist.ie, a new position funded under the European Cyclists' Federation Leadership (ECF) Programme 2013-14 – and in collaboration with Cork Cycling Campaign, a member of Cyclist.ie. See www.ecf.com for more information on the ECF.

On behalf of Cyclist.ie / An Taisce, I welcome the opportunity to peruse the proposals and to provide some considered feedback to you. In this submission, I deal sequentially with Work Packages (WP) 1, 2 and 11.

The Appendix at the end of this submission provides a full list of references.

1. Work Package No. 1 – N40 Underbridge Works (Douglas West)

1.1 Overarching Comments

Firstly it is very difficult to assess the proposals because Drawing No PL0102 (Rev D03) only shows the eastern side of the underpass. There is no detail shown of any proposals leading towards or away from it. Can Cork County Council please provide more complete drawings?

Overall, the scheme provides for the retention of five general traffic lanes while shifting the pedestrian space on the north east side of the underpass to behind the row of piers so as to provide space for a cycle lane, while retaining a very narrow (1.5m wide) footpath on the other side of the road. While we support the overarching aim to provide an “improved pedestrian and cycle linkage” (page 2 of the Part 8 Planning Application), we think that the proposals are insufficiently ambitious in terms of reallocating general traffic lanes to space for non-motorised road users (NMT) - pedestrians and cyclists.

The sub-standard width footpath on the south west side of the road will remain excessively narrow. This is, at best, disappointing given the space available. It should be noted that the National Cycle Policy Framework sets out a vision in which:

A culture of cycling will have developed in Ireland to the extent that 10% of all trips will be by bike by 2020 (Department of Transport 2009: 6)

To reach these targets, traffic schemes need to be much more ambitious so that we are transforming the public realm and the nature of the road network, *rather than squeezing pedestrians and cyclists into very tight spaces while retaining maximum capacity for motorised vehicles*. There needs to be a quantum shift in how road space is prioritised. This scheme is insufficiently ambitious in this regard.

1.2 Details

The logic underpinning the provision of a short 2m wide cycle lane alongside what appears to be (at Section 1.1 to 1.1) three south-east bound general traffic lanes (which transition then into two south-east bound general traffic lanes with one right-turn lane) is unclear. Without a coherent tie-in to the approach roads, the proposed cycle-lane may create a false sense of security for potential users and lead to a deterioration in cycling conditions rather than an improvement.

It is unclear, for example, how the transition from the proposed cycle-lane plus two general traffic lanes to two general traffic lanes only will be designed. As is, it seems that cyclists emerging from this cycle lane will vie with two streams of general traffic as they approach what will effectively be a pinch-point between the kerb and traffic island. This is particularly problematic in the context of car/truck drivers emerging from the relative darkness of the underbridge into the light *where they may be temporarily blinded within the space that cyclists are merging with general traffic*. This problem is shown clearly in the Google Earth image of the underpass – Figure 1 below.

The whole design needs to be reconsidered as a matter of urgency: it is not enough to propose a short length of a cycle lane and then expect cycling conditions in the adjacent spaces to improve.

Similarly, on the approach to the underbridge (travelling from the north west in the direction of Douglas), it is unclear what the overarching vision is for making the whole stretch more bicycle-friendly.

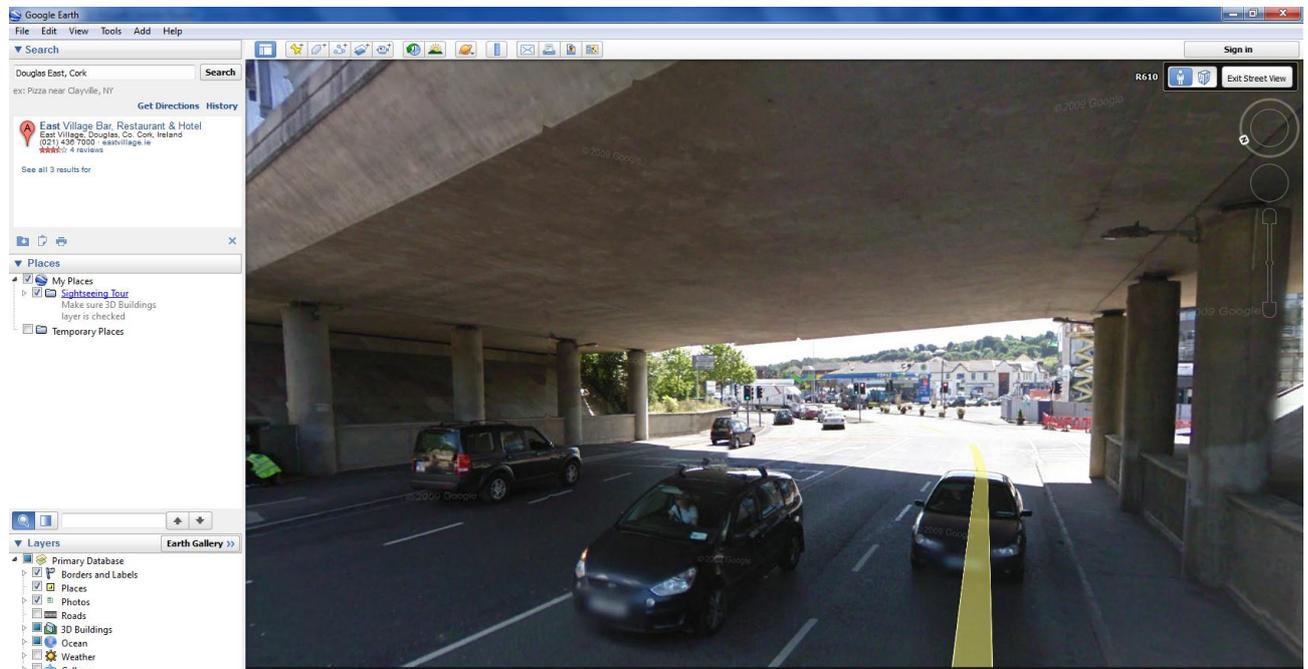


Figure 1 – Underpass looking south east showing the visibility problems as one emerges from the underpass

At the very least, for these merging spaces the scheme designers should introduce a 30kph speed limit so as to make it easier for different types of road users to interact safely with each other. It is noted in “Figure 1.0: Douglas Village Work Packages” (on page 1 of the Part 8 Planning Application) that 30kph speed limits are proposed in other parts of the Douglas LUTS area. It would enhance safety considerably if the 30kph zones were expanded to include those locations in which cyclists were entering and emerging from cycle lanes and the underpasses. Furthermore, the designers should consider providing very large bicycle symbols on the general lanes at strategic locations in the vicinity of any dedicated cycle facilities that are provided.

The exact tie-in between the footway on the approach to the underpass (travelling from the north west) and the realigned footway is unclear. This needs to be fully considered and the detail provided in reissued drawings. Furthermore, the design of the new pedestrian space behind the piers needs to be attractive, welcoming and safe (in a social safety sense); otherwise pedestrians will choose not to use it and, instead, walk along the new cycle lane.

An Taisce recommends that improved lighting is provided in the underpass so as to ensure improved visibility.

2. Work Package 2 - N40 Underbridge Works (Douglas West) South Douglas Road

2.1 Overarching Comments

As with WP1 above, it is very difficult to assess the proposals because Drawing No PL0202 (Rev D04) does not show any details of the scheme leading to or away from the underpass. Can Cork County Council please provide more complete drawings?

Overall, the scheme provides for the retention of three general traffic lanes in the underpass while shifting both (currently extremely narrow) pedestrian spaces to behind the piers and mixing cyclists with pedestrians within a shared space on the north east side of the underpass.

Again, while we strongly support the overarching aim to provide an “improved pedestrian and cycle linkage” (page 2 of the Part 8 Planning Application), we think that the proposals are insufficiently ambitious and insufficiently holistic in the design approach so as to achieve these aims. We question the need to retain the three general traffic lanes within the underpass while squeezing cyclists into a tight pedestrian / cyclist space for the southbound movements. While the width of the pedestrian / cyclist space is 3.0m, *the effective width* is much narrower when one considers the need to maintain a suitable gap between handle-bars and the piers or retaining wall.

As shown in the Part 8 application and drawings, the proposals will not provide a coherent and attractive cycling environment – they are piece-meal and will generate further conflicts with pedestrians. They are not of a high enough standard to meet the needs of cyclists of all ages and abilities. The designs go against the main advice of the National Cycle Manual which stresses the need to address the five main needs of cyclists: comfort, attractiveness, directness, coherence and road safety (National Transport Authority 2011)

2.2 Details

2.2.1 North / north-west bound cyclists

Drawing No PL0202 (Rev D04) notes the proposal to provide a “future on road cycle lane” in the direction of the city centre but no further details are provided.

The provision of (short lengths of) cycle lane on the approach to roundabouts can be particularly problematic as cyclists can end up being cut across by motor vehicles entering the roundabout. The designers need to revisit this proposal and reconsider if a cycle-lane / roundabout combination is really the best way to improve cycling conditions here.

Is a roundabout the optimal design element to have along this important link into the city centre? Can it be removed?

Furthermore, can the speed limits be reduced to 30kph here and in the wider vicinity as discussed earlier?

Can the designers provide very large bicycle logos along the roads here so as to send out a strong signal to all road users that this link is proposed to be a well-used (and high

quality) bicycle route? If the roundabout is to be retained, we strongly recommend that large bicycle symbols are used on the general lanes approaching it.

More generally, the designers need to use a broader range of instruments and tools – rather than just cycle lanes and (shared use) cycle / pedestrian paths – in order to create a cycle friendly road environment here. This is one of the overarching messages of the 2009 National Cycle Policy Framework (Department of Transport 2009: 7):

Transportation infrastructural designs need to be cycling friendly. Cycling-friendly means that routes taken by cyclists are safe, direct, coherent, attractive and comfortable. It is acknowledged that the quality of the dedicated cycling facilities designed and constructed to date in Ireland has been inadequate. In many cases, their provision has not, generally, led to an overall increase in cycling numbers. A new approach is required in which a “hierarchy of measures” is followed. The focus needs to be on:

- reducing volumes of through-traffic, especially HGVs, in city and town centres and especially in the vicinity of schools and colleges;
- calming traffic / enforcing low traffic speeds in urban areas;
- making junctions safe for cyclists and removing the cyclist-unfriendly multi-lane one-way street systems.

2.2.2 South / South-east bound cyclists.

What is meant by an "interim footpath" in the cross section? Is the “shared use cyclist and pedestrian route” meant to be permanent or not?

If permanent, then the designers need to show clearly how cyclists will manoeuvre back onto the main carriageway. This is a particular weakness in the proposals. In our experiences, shared footpath / cycle lanes in an urban context – as opposed to greenways - are problematic both for cyclists and pedestrians: one minute the bicycle is treated as a road vehicle (as is defined in Irish law); the next minute the bicycle/cyclist is treated as a pedestrian.

2.2.3 Further points

Sensors which detect cyclists should be installed at any traffic lights where they need to be triggered by vehicles.

The lighting in the underpass will need to be improved, e.g. indirect floodlights towards the ceiling, ground recessed spots.

Furthermore, it is recommended that Cork County Council use the talents of some local street artists to help create a visually appealing pedestrian environment with some creative interventions. Otherwise, the underpass will remain an unattractive pedestrian-hostile environment.

Regarding the lateral gradient, drainage issues must be addressed properly so as to avoid the situations where after heavy rain showers, cyclists end up having to navigate puddles and suffer splashing from passing vehicles etc.

3. Work Package 11 - Douglas Community Park Shared Use Cyclist and Pedestrian Route

3.1 Separating Cyclists and Pedestrians

We are disappointed that the new version of the design mixes cyclists and pedestrians. We supported *the previous design approach* in which pedestrians and cyclists were separated out. As stated in our previous submission (dated Friday, 29 Nov 2013):

We support the design approach which keeps pedestrians and cyclists separate for most of the route through the Community Park. As far as possible, it is wiser to keep cyclists and pedestrians in separate spaces given the potential speed differences between the modes. We would however suggest that the designers re-examine the Northern-most and Southern-most sections of route and rethink the possibilities in terms of keeping cyclists and pedestrians separate at these locations too. (Cyclist.ie / An Taisce 2013: 2)

However, we do think that mixed use paths can be useful *as long as they are lightly trafficked*. A rule on those paths should be that the more vulnerable users, the pedestrians, have priority. Negotiating through joggers and walkers, some with dog leads stretched across the path, is too arduous for cyclists, even at moderate speed.

If the aim is to create a walking path that can be used by cyclists when it's quiet, then that's fine. However if the aim is to create a route that is equally useful for various types of pedestrians and various types of cyclists, then it is advisable to separate them. If there is sufficient space, two paths should be constructed, one of which is clearly marked a cycle path. It also has to be kept in mind that cyclists will be going in both directions, so if a reasonable number of users is envisioned, the path needs to be wide enough to accommodate them.

A very wide path could possibly cater for a mix of pedestrians and cyclists. Currently 3m seems to be too narrow for a mixed use path.

At the southern end of the park the proposal does not meet up opposite the proposed cycle path / foot way coming the park opposite (The Mangala). Would it not be better to have them directly opposite each other?

3.2 Junctions

We reiterate the points made in our previous submission:

Our greatest concern with the proposals is that there is no attention paid to offering design solutions at the junctions of the cycleway with Church Street and with Church Road. It is the right-turn manoeuvres off and onto such routes which demand the greatest attention. Too often, we see special provision for cyclists *on*

links but nothing at junctions – often the most hostile elements of the urban environment for cyclists. This needs to be addressed as a matter of urgency.

We are, though, very happy to see the proposals for a 30kph speed limit in the village of Douglas. It does strike us however that the zone is very small in terms of its geographical area. Given that school children (and others!) on foot and on bikes will be hanging around the village and surrounding streets (and residential areas), we strongly recommend that the 30kph zone is extended. Crossing streets when speeds are lower is much easier and safer. (Cyclist.ie / An Taisce 2013: 2)

4. Conclusion

An Taisce strongly supports the Douglas LUTS framework.

However, we think that the proposed interventions (in the three Part 8 Work Packages discussed in this submission) aimed at making cycling a more normal and everyday activity *are insufficiently ambitious and the designs inadequate*. As they currently stand, the interventions *will not lead to a real shift* in the quality of cycling environment. This is especially the case for the design of two underpasses.

There is little evidence to indicate that the designers have engaged with the ideas and policy measures within the government's National Cycle Policy Framework or with the recommendations in the NTA's National Cycle Manual.

In short, there needs to be a real “step up in gear” if we are serious about providing a high quality cycling environment for all ages and abilities and reaching our National targets for cycling - as opposed to continuing to cater for the car and providing ‘free flow’ driving conditions where vulnerable road users are simply ‘out of the way’ - as has been done for the last number of decades. In short there needs to be a shift towards a new transport paradigm.

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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APPENDIX I – REFERENCES

- Cyclist.ie / An Taisce (2013), 'Submission in regard to: Douglas LUTS Work Package 11 – Douglas Community Park Cycle Track dated Friday, 29 November 2013'.
- Department of Transport (2009), 'National Cycle Policy Framework', (Department of Transport).
- National Transport Authority 'Cycle Manual: 1.2 Five Needs of Cyclists', <<http://www.cyclemanual.ie/manual/thebasics/fiveneeds/>>, accessed 21/March 2014.