

The Tailor's Hall,  
Back Lane,  
Dublin 8.

Ms. Mary Gordon  
Senior Staff Officer  
Civic Offices,  
Aran Place,  
Ballina,  
County Mayo.

E: [Damien.otuama@antaisce.org](mailto:Damien.otuama@antaisce.org)  
T: 01-7077064  
M: +353-87-2840799

Thursday 31<sup>st</sup> July 2014

## **Re: Proposal to develop a Greenway Amenity from Ballina to Killala, County Mayo**

Dear Ms. Gordon,

I refer to your letter dated 5<sup>th</sup> June 2014 in regard to the above scheme.

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. See [www.ecf.com](http://www.ecf.com) for more information on the ECF.

### **1. Strong Endorsement for the Project / Benefits of the Scheme**

On behalf of Cyclist.ie and An Taisce, I would like to express strong support for the proposed greenway from Ballina to Killala. This project has the potential to create a wonderful amenity in North County Mayo traversing a beautiful landscape and revitalising a historical rail route in a new guise.

This project was highlighted in the 2006 West Regional Report of the *Strategy for the Development of Irish Cycle Tourism* produced for Fáilte Ireland and it also forms part of the "Atlantic" Euro Velo Route #1. The proposal is also consistent with the broad aims of the government's (2009) National Cycle Policy Framework (NCPF) which aims to regenerate a strong cycling culture in Ireland and to achieve a target of 10% of all trips to be taken by bike by 2020.

An Taisce warmly welcomes the construction of high quality cycle routes by Local Authorities, where their impact on the built and natural environment has been thoroughly assessed and where they have been designed and constructed in a manner sensitive to those environmental considerations.

We expect that this greenway will bring additional tourism into the towns of Ballina and Killala and surrounding villages. It will offer a valuable amenity which should help persuade already-committed visitors to County Mayo to stay a little longer and persuade others to visit the area for the first time. It has great potential to complement the very successful Great Western Greenway and to propel Mayo County into being a world class cycling destination with multiple routes on offer. Furthermore it will give those attending local festivals - such as the Ballina Salmon Festival - and various other events additional ways to spend their time, thus helping to nurture strong local cycle hire and guided cycle tour businesses and to create additional employment in County Mayo.

The route will appeal to several different types of users:

- firstly, the cycling visitors and locals wishing to cycle all, or at least a significant length, of the Irish leg of the spectacular EuroVelo “Atlantic Coast” Route #1 – Figure 1 below;
- secondly, (local) recreational riders, including families with young children, who may be less experienced and who may wish to avoid the busier, more heavily trafficked roads. A distinct advantage of using a disused rail-line for a cycle route is that the gradients tend to be quite gentle and thus the routes are especially suitable for people aged 8 to 80.
- thirdly, cycling commuters and utility cyclists travelling (in particular) into Ballina, Killala and other destinations along the route so as to access a range of amenities (shops, historic sites, schools, employment centres etc.) via quieter and safer routes.



**Figure 1 – Euro-velo Network. Euro-velo Route #1 “Atlantic Coast” runs from Scandinavia to the Algarve via North Co Mayo**

Furthermore, we would hope that the facility will help reduce car local usage in the area thus helping to relieve congestion in Ballina. The amenity could also be used creatively so as to get school children back cycling again and thus developing life-long healthier habits.

Most important of all, the creation of the facility would be a constructive response to the emerging crisis of having a nation of overweight citizens with the associated morbidity costs for a struggling health system.

Finally, we note also the further excellent reasons to develop this route as captured in the 2013 National Cycle Network Monasteries of the Moy Greenway document.

## 2. Making All Roads in Mayo Safe for Cycling – as well as Creating Greenways

One concern we do have with cycleways / greenways is that they can sometimes, inadvertently, generate the idea that cyclists have no place on the ordinary roads. There is insufficient attention being paid to improving driving (and indeed cycling) standards on local authority managed roads and consequently, we are now seeing a new generation of cyclists who, whether from parental pressure or their own lack of confidence, will only cycle on traffic-free paths. We see teenagers in some estates – even those without through-traffic or much traffic - where cycling within the estates is confined to the footpath only. One also sees the ridiculous situation where people now drive to somewhere (e.g. local parks) in order to cycle.

So, while greenways and trails have an important role to play as amenities for those who do not feel comfortable in hostile car-dominated environments, *they cannot reduce the need for bicycle equality and safety on the country's roads*. Adequate and well maintained hard shoulders, cycle-friendly road design, motorist education and law enforcement, as well as traffic reduction policies, are the most effective way to increase cycling numbers – as set out in the NCPF.

## 3. Biodiversity and Enhancing the User Experience

The route will enable users to enjoy a direct experience of the natural biodiversity of the areas traversed. Therefore it will be beneficial both to biodiversity and to the cyclist / walker experience to retain as many natural features as possible. For example, hedgerows provide important shelter for cyclists as well as for birds and other wildlife.

I wish to stress the following further points re: biodiversity issues in the construction and maintenance phases for the greenway:

- Vegetation clearance needs to take place outside of the nesting season, as prescribed under the Wildlife Act. It is important that both clearance and construction works takes place in the period September 1st to February 28th, in order to avoid disturbance of wildlife
- No herbicides to be used
- The removal of hedgerow and scrub will be carried out only where absolutely necessary
- Hedgerows are left “wild” ie untrimmed wherever possible
- Lighting to be bat-friendly and sensor-activated, so that illumination is minimised.
- The use of heavy machinery is avoided where at all possible
- As noted in the EIA Screening Report (pages 3-4), that appropriately sensitive designs are used near the habitats in and around Lough Callog

## 4. Access to and from the Greenway / Maximising Connectivity

We strongly recommend that access is provided to as many adjacent local roads, developments and destinations as possible in order to maximise the utility of the route. This should, of course, include any features of interest to tourists such as accommodation, food, entertainment, sights, heritage features, attractions etc. – e.g. Rosserk Abbey and Moyne Abbey. More specifically, we recommend the following:

- providing cycling-friendly, safe and attractive links between the southern end of the facility to the centre of Ballina. This is likely to require taking a fresh look at the traffic management, road designs and speed limits on the town's roads – including, for example, the (cyclist-unfriendly) one-way street systems that are in place. It is essential that it is possible to cycle safely and directly from, say, the new pedestrian/cycle bridge at the southern end of the town onto the greenway.
- linking directly westwards from the greenway across to the housing estates to the west of Map 03. This might be a better use of funds than running an additional north-south route running just to the west of the sports ground ([Map 2 – Map 3](#)).

- it would be a huge boon for the greenway and for the town for there to be a dedicated cycle – pedestrian bridge across the River Moy roughly in the vicinity of just north of Ballina House / near the sports grounds (at the north west corner of [Map 02](#)).
- a safe and attractive link from the (Educate Together) primary school at Newtownwhite (i.e. just to the east of [Map 17](#)) to the greenway so as to provide school pupils with a greatly enhanced opportunity to cycle to school
- where there are level differences between the route of the disused railway line and local roads, there needs to be good access to the facility nearby (e.g. [Map 21](#), southern end)
- connecting with all of the residential roads/estates within Killala ([Maps 23 and 24](#))

## 5. Transitions and junctions

In regard to the transitions and junctions between motor-traffic free greenway type parts of the scheme and the on-road parts, the detailed design of these need to be very carefully addressed so as to ensure the safety and comfort of cyclists and pedestrians. Too often, we see otherwise excellent schemes let down by inadequate designs at these types of locations. For example, the following places need particular care:

- On [Map 7](#), where the greenway through forest meets Old French Road and crosses over to a newly proposed facility on the west side of the existing fence
- On [Map 22](#), where the route intersects with the main road into Killala, it would be terrific to have a Toucan Crossing or equivalent signalling arrangement to enable users of all ages and experiences to cross that busy road safely (Figure 2 below)



**Figure 2 – The need for a signallised crossing of the main road into Killala**

## 6. Trail Widths

Section 1.4.1 of the Ecological Impact Assessment & Appropriate Assessment Screening Report (McCarthy Keville O'Sullivan Ltd., 2014) indicates that the “trail will mainly consist of a 3m wide carriageway with an unbound stone surface over a hardcore base” (page 2).



It is strongly recommended that a 4.0m wide facility is provided, at least along those parts of the facility that are closest to both the towns of Ballina and Killala. This is because pedestrian numbers will be highest in these areas (and one is likely to encounter walkers with dogs on long leads), so a 4.0m width rather than a 3m width will allow for easier and safer movements all types of greenway users.

Furthermore on those parts of the route which will be bounded on either side by fences and/or hedgerows, it is essential that the space between the fences/hedgerows is *at least* 3.5m so that effective width is at least 3.0m. That is, one must allow for sufficiently large gaps between the handlebars of bikes and adjacent walls/fences and consider how cyclists move in towards the centre of facilities.

## **7. Surfaces**

It is recommended that a compacted bound surface – rather than an unbound stone surface - is used over as much of the facility as possible (i.e. those stretches which are not in ecologically sensitive areas). A cyclist experiences much less friction riding along a bound surface than an unbound surface, and less maintenance is required with the bound surfaces.

The quality of the resurfaced part of the route just south of the forest in Belleek is excellent – Figure 3 below.



**Figure 3 – High quality surfacing at facility just south of Belleek forest**

## **8. 30kph Speed limits for the 'on-road' part of the route**

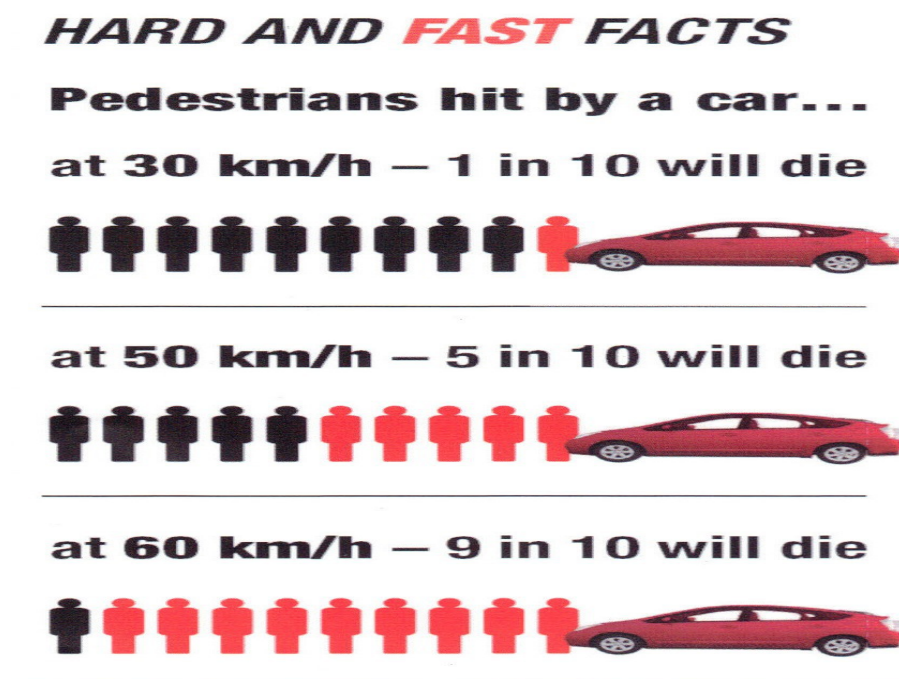
It is noted on maps 8, 9, 10, 11, 12, 13, 14 and 15, that it appears as if the route will run along existing local roads. It is strongly recommended that a 30kph safer speed limit is introduced on these roads. While these roads are lightly trafficked, it is essential that speeds are kept low.

## **9. Safer 30kmh Speed Limits for Roads in Adjacent Urban Areas**

Tying in the previous point, there is an increasing trend to provide 30km/h speed limit zones in urban areas to improve safety and so enhance the urban environment especially from pedestrians' and cyclists' perspectives. The recently published revision of the Design Manual for Urban Roads

and Streets (DMURS) encourages the further introduction of 30km/h zones in urban areas, and outlines the safety differences of different speed levels. See the copy (of Figure 4.2) from DMURS in Figure 4 below .

Given the likelihood of increased numbers of cyclists and pedestrians accessing the cycle greenway at various access points along its length, it is strongly recommended that Mayo County Council introduce a 30km/h speed limit in these adjacent zones especially in the vicinity of the residential areas, schools, sports grounds and other busy locations (if not already in place).



**Figure 4 – Outcomes from car impacts with pedestrians as a function of speed**

## 10. Bicycle parking along the route

It is strongly recommended that the opportunity is seized to introduce plenty of high quality bicycle parking stands at amenities and in the built-up areas along and next to the proposed facility. Such cycle parking stands will be well received by cycling tourists and by locals.

For details of cycle parking planning and design, see Chapter 5 of the National Cycle Manual .

## 11. Picnic facilities

There are already some fabulous picnic facilities in the Belleek forest. As plans advance, it is recommended that the further sheltered picnic facilities are provided at other locations along the route. Having a sheltered place to rest on a windy, rainy day in the west will be appreciated greatly by tourists!

## 12. Signage

The provision of the cycleway is likely to generate increased cycle (and pedestrian) activity on the surrounding roads. The Local Authority should provide appropriate signage on the adjacent roads to warn motorists of the increased likelihood of encountering (young and potentially inexperienced) cyclists.

### **13. Public Art**

An Taisce acknowledges that very long stretches of cycle route through some surroundings can create a less than ideally stimulating environment. Canal-side and railway line cycle and walking routes can suffer particularly from this weakness. It is for this reason that public art is an essential element of the UK National Cycle Network. It is strongly recommended that the design consultants and the Council reflect on the great potential for enhancing the visual interest and place-making dimensions of the route by incorporating quality public art and other design features into the scheme. See, for example, the website of Sustrans as per the list of references in Appendix I.

### **14. Upkeep**

An essential part of a successful cycleway is upkeep. A route can easily fall into disrepair with broken glass, litter and uneven surfaces immediately making the track undesirable to the public.

We would like to highlight the need for a maintenance regime to be put in place which is specified and executed in a manner sensitive and appropriate to the environmental considerations.

### **15. Opportunities to link with Green Schools**

The Green School Initiative is a highly publicised, student-led initiative operated by An Taisce. Sustainable travel is an integral part of the programme amongst other aspects of sustainable living. We note that there are a number of schools either directly adjacent to or quite near the proposed scheme.

We would encourage you to assess if the schools are involved in Green Schools and, if so, that the cycle route is incorporated into and promoted through the initiative. In this way, it could prove to be an excellent platform to heighten awareness and increase cycle traffic on the proposed route, thus facilitating in its success.

### **In Conclusion**

An Taisce warmly welcomes the construction of the walking / cycling route between Ballina and Killala along the identified corridor. We believe that the facility has enormous potential to help create a wonderful tourism and recreational product for those in County Mayo and to be a critical link in the Euro Velo "Atlantic" Coastal Route. If carefully linked to local amenities, it could also become a terrific utility cycling route as well.

We trust that our commentary will assist Mayo 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,

Damien Ó Tuama,  
Cyclist.ie / An Taisce National Cycling Coordinator,

## APPENDIX I – REFERENCES

Ballina Town Council and Mayo County Council (2013) National Cycle Network Monasteries of the Moy Greenway - Submission to Dept of Transport, Tourism and Sport for Seed Funding, <<http://www.smartertravel.ie/sites/default/files/uploads/Mayo%20Co%20Council%20-%20Monasteries%20of%20the%20Moy.pdf>>, accessed 31/July 2014

Colin Buchanan and Sustrans (2006), 'West Regional Report of the Strategy for the Development of Irish Cycle Tourism'.

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Department of Transport, Tourism and Sport and Department of Environment, Community and Local Government (2013), 'Design Manual for Urban Roads and Streets'.

European Cyclists' Federation 'Eurovelo - The European cycle route network ', <<http://www.eurovelo.com/en/images/eurovelo-map>>, accessed 18/July 2013.

National Transport Authority 'National Cycle Manual', <<http://www.cyclemanual.ie/>>, accessed 16/May 2013.

McCarthy Keville O'Sullivan Ltd. (2014) Ecological Impact Assessment & Article 6(3) Appropriate Assessment Screening Report (Draft Revision 01, 08/04/2014)

Sustrans 'Art on the National Cycle Network', <<http://www.sustrans.org.uk/ncn/map/information/national-cycle-network/art>>, accessed 22/August 2013.