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Department of Transport, Tourism & Sport
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Friday 14 July 2017

Greenways Strategy

Dear Sir / Madam

On behalf of Cyclist.ie – the Irish Cycling Advocacy Network, please find below our submission in regard to the above consultation paper.

I have followed the format of the template on <http://www.smartertravel.ie/content/greenways>.

I would be grateful if you can acknowledge receipt of same (to my email address below).

Yours faithfully,

Dr. Damien Ó Tuama,
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Why invest in Greenways

Questions for consideration

Do you agree that the State should invest in greenways?

Yes. Greenways are an important part of the mix in creating an environment which is conducive to safe and enjoyable walking and cycling. Alongside the creation of built-up areas (villages, towns and cities) with safe 30 km/h default speed limits, greenways in particular provide a place that younger and older people, and those who are less experienced cycling in a mixed traffic environment, can enjoy active travel and recreational cycling and walking. Greenways are not just for tourism purposes.

What do you consider to be the most important benefits that greenways can deliver in Ireland?

- They can provide **safe and attractive green corridors from the centre of villages, towns and cities into surrounding rural areas**. This is particularly important when so many of the (arterial) roads close to villages/towns/cities are heavily trafficked including heavy goods vehicles and buses - both of which are over-represented in serious and fatal collisions involving pedestrians and cyclists.
- They provide routes that are safe and attractive for people who would like to walk and cycle in **rural areas** where other roads have high speed limits (80 or 100km/h) and/or include HGVs in the traffic mix. They are also quiet environments which enable the users to hear the sounds of nature - the wind, the birds, the bees - sounds which are drowned out by motor vehicles on other routes.
- Construction and development of quality greenways encourages more walking and cycling and creates a strong media and social environment of support for cycling and walking, and thus makes the development of future green routes in other areas, more acceptable and easier to 'sell'. The recent extensive publicity around the opening of the Waterford Greenway, and subsequent boost to the local economy, demonstrates this clearly.

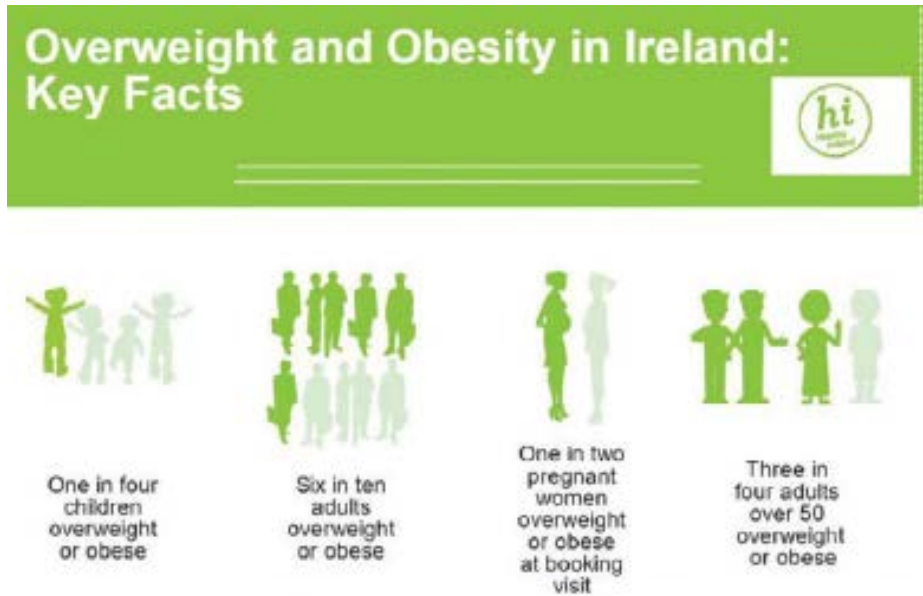
Are there benefits to be derived from greenways other than those set out above?

Pages 9-13 of the document provides a pretty comprehensive list.

What benefits should be given primary consideration when considering investment in future greenway projects?

- The positive impact on public health of enabling more people to walk and cycle. As we know from Healthy Ireland's Obesity Policy and Action Plan, 2016-2025, we have a serious obesity and overweight problem in Ireland with 6 in 10 adults in these categories - as shown in graphic below.

- The potential for rural regeneration and growth of local economies and employment
- The positive effects of getting people out of cars and moving to an environmentally friendly mode of transport, helping to reduce noxious emissions and to meet our onerous and pressing climate change targets



From page 14 of A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 - 2025

Should the State invest in greenways that do not offer the full range of benefits set out in this Chapter, e.g. greenways that do not offer real potential to develop tourist/visitor interest but provide a local recreational facility?

- High quality greenways that link to (the centre of) villages, towns and cities will attract different types of users including locals taking commuting trips, other utility trips and recreational journeys. They will also act as a tourism draw when encompassing an attractive landscape, visitor attractions, etc.
- Even if a greenway does not have potential to develop a tourist/visitor interest, it may still have enormous value in providing a motor traffic-free route that will attract users that are not comfortable using roads with (higher speed) motor traffic. Such a greenway (or cycleway) may simply provide important linkages between various parts of a city or town while following an attractive route - say beside a river or canal. So, the short answer is **yes!**
- Availability of (financial) resources will always be a major determinant in deciding on investment priorities. Resources, in the case of greenway fund allocation, should ideally be strategically targeted for optimum benefit. This will inevitably mean that different projects will lose out depending on the selection criteria chosen. It is critical to be clear on what the societal priorities are in developing any network.
- We stress the importance of completing Ireland's EuroVelo route system ASAP so that Ireland can compete with our European neighbours for cycle tourists/visitors.

Common issues arising in the development of greenways

Questions for consideration

How should local authorities and/or other greenway project developers engage with local communities on greenway proposals?

As early as possible in the process.

The full range of benefits for the community - economic, social and environmental - should be carefully articulated using a creative mixture of media and methods.

What level of consultation should take place and at what stage should this be initiated?

- Present consultation processes have been found to be deficient and confrontational in many cases, resulting in interminable delays in the planning process, and often leading to poorer quality final route standards. It is clear that most Local Authorities do not possess the necessary skills to carry out successful community engagement. We recommend that professional consultation and facilitation skills be brought on board at the early stages of any project, to support the 'community engagement' process, and help to lead to a positive solution.
- Consultation should be as early as possible, and a reasonable time-frame allowed. It is clear that the standard Part 8 Planning process is often not acceptable as a consultation tool and, where it is used, different local authorities publicise the process (online and otherwise) in quite different ways.
- Citizens should be actively persuaded and encouraged to engage with any consultation process to increase the 'buy-in' to any project
- When the process around the review of each Local Authority's Development Plan is taking place, the subject of greenways should be raised at the early (issues paper) stage of the redrafting of the Plan.

Is consultation as part of any statutory requirements sufficient?

NO! See responses to previous question. It needs to go beyond statutory processes so as help build up community support for it.

Use of Public/State Land vs private land for development of Greenways

Questions for consideration

Should local authorities and/or other project developers seek to use State-owned lands, where possible, for the development of greenways?

Where State-owned lands are available, they should be used when this helps with creating an attractive greenway ideally linking with population centres while knitting into a national network of greenways and signed cycle routes (see later in this submission).

The use of state owned lands can often ensure that facilities can go through planning and design processes at a faster pace, and in turn create the momentum for further route developments outside the state lands.

Are there reasons why State-owned lands should not be used for the further development of greenways in the State?

Only if the lands in question are required for a purpose that is considered more important, or have specific EU designations that restrict developments on the lands, though these restrictions must be fully and properly balanced against the societal gains to be made from any proposed developments. This situation is particularly relevant in proposals on the development of the East Coast Trail around Dublin Bay and beyond .

Are there particular types of State-owned lands that would not be appropriate for the development of greenways? If so, why?

Presumably the Military Range Lands in the Glen of Imaal and equivalent spots on State lands would provide suboptimal locations for the development of greenways, but each possibility that arises should be fully assessed.

How can the synergies between 'blueways' and 'greenways' be maximised to provide most benefit to the future development of outdoor recreational infrastructure in the State?

- Active tourism, as stated in the consultation paper, will be a critical growth area in the future of rural regeneration. The linking of activities on and in water with parallel on-land greenways, particularly where old towpaths exist, is a 'no-brainer' fit, and will only help to support the growth of physical activity.
- Buy-in of all agencies, both national and local, to the development of active modes of travel and general physical activity is critical. The linking of Blueways and Greenways is a natural development in this process.
- Provide lots of high quality bicycle parking at suitable locations where greenways and blueways intersect so that recreational cyclists / visitors / tourists can be persuaded to take to the water.

Land Access Arrangements

Questions for consideration

Is the permissive access model an appropriate basis for the future development of greenways in the State?

No. It is inappropriate for the state to make substantial investments for the public good on private lands while having no guarantee that access might be blocked by at least one land-owner at some future point. It is particularly high-risk when there is a large number of land-owners involved.

Permissive access arrangements can avoid potentially expensive land acquisition costs in the development of greenways but are there other benefits to using this model that would render it more appropriate in certain circumstances?

Perhaps it might be appropriate where there is a small number of landowners involved and when all other (CPO) options have been considered and ruled out, but if full and inclusive consultation processes are used in developing any project, this outcome will hopefully not be necessary .

What type of greenway projects would permissive access be suitable for?

See above.

Are there projects that it would be unsuitable for?

As above, it's not an ideal model. It would be particularly unsuitable on commuter routes as people could be dependent on it for their daily commute.

Acquisition of land

Questions for consideration

Where a proposed greenway route involves access to privately owned land do you think that CPO is a valid mechanism for the acquisition of land on a route?

Yes. However, in a case such as the EuroVelo Route 2 in East Galway where there is widespread local opposition, other alternatives such as quiet local roads, should be considered, as they are often just as acceptable, and quite often afford a high quality cycling experience when carefully thought through and implemented.

If you don't think CPO is valid, what alternatives would you suggest?

Seek out quiet, lightly trafficked local roads and, where appropriate, seek to introduce lower speed limits for the roads.

At what level should consultation take place with landowners where CPO is being considered - at the individual landowner level or with representative bodies?

Ideally a high level agreement and an agreed approach will be teased out with any national or local representative body in advance and that can then inform the discussions at the local level. But, no two landowners are the same and are often represented by different organisations, or belong to none (such as individual non-farmer landowners). Discussions need to be held at the individual and organisational level.

What approach should be taken to the future development of greenways – a network approach or other?

Should the concept of the National Cycle Network as proposed in the 2010 NCN Scoping Study be developed or set aside?

- In both Irish and International law (1967 UN Convention of Road Traffic, Vienna), the pedal cycle is a vehicle and therefore the rider is a driver of a vehicle fully entitled to be on public roads (except for motorways where there is a legal exclusion). In regenerating strong cycling cultures (everyday utility, recreational, tourism) in Ireland, the broad approach must be that all roads - besides motorways - are suitable for cycling. This point must infuse all road design and regimes of speed limit setting and speed enforcement.
- While the concept of a National Cycle Network (NCN) can be a useful one, particularly in the sense of highlighting especially attractive and enjoyable routes for visitors and cyclists of all ages and abilities, the NRA approach - broadly based around taking a motorway planning model and applying it to cycling - was flawed. It was too focused on 'interurban' routes (as below) and didn't acknowledge the point that recreational cyclists prefer to use attractive (coastal) routes intersecting with vibrant towns and villages.



- Any NCN proposal should thus be considered on a broad basis, and especially consider how it will grow cycling in Ireland, how it will improve public health and social engagement, and local economies. An NCN proposal must also recognise that the development of the urban networks, where most of our population resides, is first priority and should link into any broader national network.
- Network planning should ideally be on the basis of ‘green’ connectivity and potential usage and not merely an exercise in joining dots on the map.
- Any NCN developed must be understood to be an ‘organic’ network, that can alter with time and changes of priorities, and particularly where more attractive potential routes become available. As part of any network development it is critical that there is a professionally planned promotion and marketing of routes so as to ensure that usage of the facilities grows.
- The 2007 Fáilte Ireland Strategy for the Development of Cycle Tourism - with its focus on a coast-based network and with ‘loop routes’ encircling hub towns (as shown below) should be revisited. This study includes substantial work on the promotion of routes.



Is it appropriate for the State to invest in individual greenway projects that may never have potential to connect to other greenways or substantially off-road cycle facilities?

- The preferred approach should be to identify an overarching network - made up of greenways and other motor-traffic free routes but also of lightly trafficked and lower speed signed cycle routes. So, even if a greenway cannot (easily) connect to 'other greenways or substantially off-road cycle facilities' it should link in with other attractive roads - as in common on the EuroVelo network. See discussion below.
- The other point here is that 'stand-alone' greenway projects should link directly into several villages, towns and attractions. What should be avoided are greenways that users need to drive to - thus bringing more motor traffic onto otherwise quiet rural roads - in order to bring children out cycling. Greenways need to link to population centres.

Should the Greenways Strategy aim to develop a network of interconnected greenways or should alternative approaches be considered?

- It is probably not economic to develop a complete *national network of greenways*. Cycling routes on the EuroVelo model, or the UK Sustrans model, should be used to connect greenways, and indeed cities, towns & villages. As above, that means using lightly-trafficked local roads with additional infrastructure to avoid busy roads. This needs to be accompanied by excellent sign-posting and ancillary infrastructure (information boards, seating, picnic tables with shelter, public toilets, art on the trail etc).
- The New Zealand network example provides an interesting approach

An approach based on EuroVelo?

Questions for consideration

Do *EuroVelo 1* and *EuroVelo 2* offer an approach for the development of greenways and other cycle routes in Ireland?

- Yes. The EuroVelo approach has been developed over a 20+ year period - see here for a brief history of EuroVelo <http://www.eurovelo.org/wp-content/uploads/2015/05/EV-history-2015-JEL.pdf> - so there is a logic in drawing on the expertise and experience of those who have been developing these routes over so many years.
- EuroVelo 1, which aligns to a significant degree with the coastal cycle route identified in the Fáilte Ireland 2007 study (above), would provide a fabulous coastal route from (within RoI) from Donegal to Wexford so the planning of the remainder of the coastal route in Ireland could and should draw from this route. EuroVelo 2, mainly following canal towpaths and disused rail-lines between Dublin and the River Shannon, provides an excellent template for the development of further greenways (and an NCN) in Ireland.
- Ireland needs to also have an active National EuroVelo Coordination Committee (NEVCC), to support the development of these networks, to recommend any new route proposals, such as an East Coast Trail connecting Wexford to Belfast, and to get most benefit from the promotional opportunities offered by being part of the EuroVelo network.
- A further relevant point here is that the Department of Transport, Tourism and Sport needs to appoint a National Cycling Officer that can connect in directly to the European Network of National Cycling Officers - <https://ecf.com/community/national-cycling-officer-network>.

Do you have experience of cycling on a Eurovelo route on continental Europe? Do you think the development of *EuroVelo* routes in Ireland would help to increase cycle numbers?

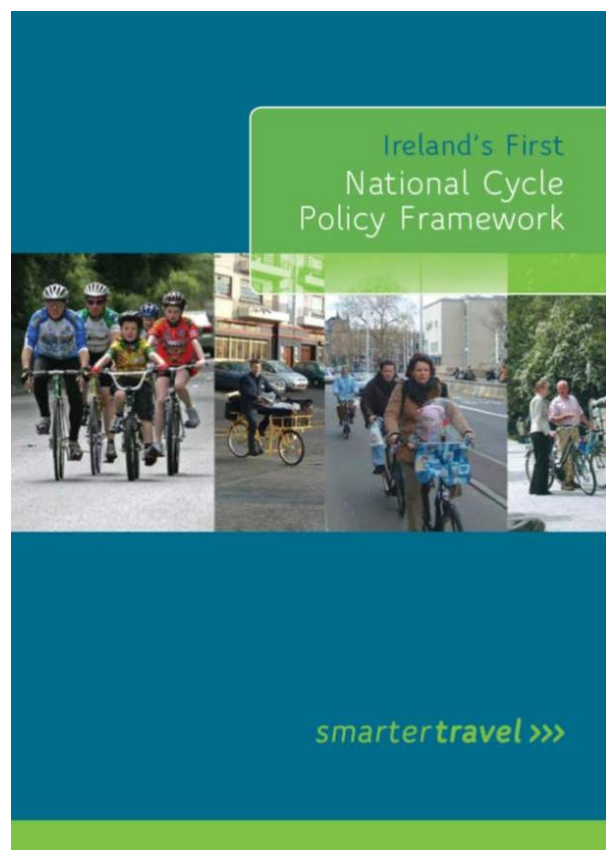
Yes, we have cycled on many EV routes throughout Europe. By plugging into the EuroVelo network - and by drawing on its methodology and marketing materials - it makes a lot of sense. This is particularly so because Ireland as a small country can benefit from the wider knowledge of and familiarity with the EuroVelo concept all around Europe. This knowledge will increase over the coming years and decades as more and more routes are realised.

We note also that extensive sectors of EV1 and EV6 go through SACs in both France and Spain. The presence of cyclists does not disturb birds or other wildlife. Routing via SACs should be considered and not rejected.

Should the focus of the Greenways Strategy be on greenways in the strictest sense (fully or substantially off-road) or should the use of lightly-trafficked roads like those on *EuroVelo* routes also be considered if a 'network' approach is to be taken?

What role, if any, should *EuroVelo* routes play in the Greenways Strategy?

- As stated above in previous questions, the plan should be to provide traffic free routes linking with signed, lightly trafficked, low speed roads.
- The Greenways Strategy should, essentially, become a core plank of a revived and renewed cycle tourism and recreational cycling strategy - which itself draws on, connects with and elaborates section of the National Cycle Policy Framework (2009) - which itself needs to be re-prioritised as a government priority!
- Both EV1 and EV2 should be central elements of the new Greenways / Tourism & Recreational Cycling Strategy connecting back to the NCPF. EuroVelo has an important role to play here in terms of connecting together much of the Irish cycling offer and providing a bridge to what our neighbours are doing.



The NCPF needs to be reprioritised by the government!

What role, if any, should EuroVelo routes play in the Greenways Strategy?

See above.

Urban Greenways

Question for consideration

Should the Greenways Strategy address the development of urban greenways or should these continue to be pursued in the context of urban Transport Strategies as referenced above?

The Greenways Strategy needs to acknowledge that connections to urban areas are crucial. As per the National Cycle Policy Framework, “greenways are especially important for, typically, the first 10km along the routes emanating from busy town centres which are heavily trafficked and particularly unattractive for inexperienced or very young cyclists” (page 22). Therefore there needs to be high quality greenways emanating from and leading into all of our cities and large towns. These particular greenways will tick multiple boxes in terms of catering for:

- Visitors who have travelled over for short ‘city breaks’ but who want to explore the hinterlands of the cities as well as the centres
- Tourists starting their trips in cities but who are then travelling onwards by bike further afield
- Recreational cyclists based in and around the cities
- Commuters whose journeys align at least to some extent with the greenways built
- Safe routes to school
- Other utility trips (cycling to the shops, pub, cultural institutions, sports etc.)

It is particularly important that **Dublin**, the capital city, has a top class offer of greenways running alongside or near its most important and attractive water bodies. I.e. alongside:

- The Liffey - A Liffey Cycle Way is crucial!
- Grand Canal (the connection between Portobello/Rathmines and Inchicore is crucial!)
- Royal Canal
- The River Dodder
- The Santry River
- East Coast Trail

This network of proposed greenways is shown in the following graphic (borrowed from the Green Party Dublin Greenway Campaign):



Dublin City Council are considering detailed plans for a segregated cycle route along the North Quays from Heuston Station to Dublin Port. By making the journey safe we expect to see a 50% increase in people travelling by bike.



This Greenway begins near Dublin Airport and follows the Santry river. The proposed route follows an existing network of public parks and established riverside tracks. By spending a modest amount of money connecting these sections together we can transform the whole area.



The proposed route would radically improve one of the busiest and worst cycling trips in the city. The idea is to create a 2.5km two way cycleway which will run from the Clontarf Road via Fairview and Amiens Street to a safe crossing of the Liffey at Talbot Memorial Bridge.



Inland Waterways Ireland have come up with a bold 40km greenway plan using the Royal and Grand Canals, with orbital connections to the west of the city. The more people using the canal, the safer they will be for everyone.



Plans are now being developed for a Greenway running from the source of the river to Ringsend. We have been supporting the www.Dodderaction.org submission which aims to avoid conflict between pedestrians and cyclists and also to protect the abundant wildlife along the river.



It is time to build the coastal cycling and walking track we've been talking about for years. A high quality coastal path from Bray to Balbriggan would transform local commuting as well as providing a great leisure route.



The Liffey Cycle Route – The lynch-pin of the capital's greenway network

Equally, it is crucial that there are high quality safe greenways emanating out of:

- Cork (e.g. Extending/upgrading the Blackrock to Passage West greenway to Carrigaline, Ringaskiddy and Crosshaven, a Cork City to Kinsale greenway, a Cork City to Carrigtwohill / Midleton greenway/cycle super-highway, a Ballincollig Riverside Greenway, a Blarney/Tower Greenway, a Macroom Greenway)
- Galway (to link to Connemara via NUIG and crossing and alongside the Corrib)
- Limerick
 - Continuing the good work of the Smarter Travel City - UL route to extend it to Annacotty; this is an existing path, but which currently deteriorates significantly along its length
 - Further stages along the Shannon: repair / rebuild the old bridge over the Mulcair (near Annacotty), currently not safely usable; extend the path to Castleconnell and ultimately Killaloe, so as to significantly improve the Lough Derg Way, making more of it riverside and off-road
 - As part of this, consider a foot / cycle bridge over the Shannon, at Parteen Weir
- Waterford (e.g. by completing the 'last mile' from the fabulous Waterford-Dungarvan greenway into Waterford City centre and constructing the New Ross to Waterford Greenway)
- Sligo will be part of EV 1 and could have a spur to the Western Rail Trail which would start at Collooney.

Greenway users, standards and accessibility

Questions for consideration

What type of surface should be used on Greenways?

Preferably tarmac for safe cycling. The life-time costs of maintaining such surfaces are more favorable than the more regular maintenance costs associated with grit/quarry dust finishes. It's quite frightening on the Great Western Greenway between Mulranny and Newport to watch pre-teens flying ahead of their parents on steep descents on grit. Anecdotally there have been a number of minor falls and skids on grit surfaces, resulting in minor injuries.

Should different areas (rural/urban) have different surfaces?

It's especially important that sections of greenway within and closer to urban areas have tarmac surfaces. On particular sections with predicted low usage in rural areas, then a quarry dust may be acceptable.

Should access be controlled or open?

Open. Access for wheelchairs (motorised and hand operated), fully laden touring bikes (see below) recumbent bicycles, trikes, cargo-bikes (see below) must be assured. All bikes are not simple two-wheelers, and must be catered for.





Any other comments/suggestions?

Cyclist.ie warmly welcomes the development of a Greenways Strategy which will form a core part of a revived/renewed Recreational, Tourist and indeed Utility Cycling Strategy (i.e. the National Cycle Policy Framework). It is particularly fitting that this work is happening in the year of the Bicentenary of the invention of the bicycle.



We commend the Department of Transport Tourism and Sport for the well thought out and fairly comprehensive content of the DRAFT consultation document, but suggest that the following issues need to be included, which are not at present.

- We suggest that a fully agreed and clear **definition of what a 'greenway' means**, needs to be included in any final document, so that there is no misunderstanding of the concept.
- We further suggest that the Strategy itself should stress the point that **greenways are only one small (yet important) element of a wider approach to nurturing cycling**. In terms of the National Cycle Policy Framework and its 19 Objectives, the creation of greenways is part of Objective 3: "Provide designated rural signed cycle networks providing especially for visitors and recreational cycling".
- Funding for greenways should be seen in the context of proper funding for walking and cycling. The United Nations Global Outlook on Walking and Cycling (2016) recommends that **20% of the total transport budget should be set aside to fund non-motorised transport (NMT)** - walking and cycling - at national and city level. See page 36 of <http://www.unep.org/transport/sharetheroad/news/launch-global-outlook-walking-and-cycling>
- The agreement and application of defined standards for rural cycle routes needs to be revisited for any future developments. A number of poor quality routes have recently been developed, which do not conform to either TD300, the TII standard, or the National Cycle Manual.
- Public Transport connections into any greenway network need to be prioritised, including the ability of potential users to transport bikes by public transport. At present this is severely limited and needs to improve to ensure access and use of greenways grows as envisaged. This is particularly important so as to reduce the need for the creation of large (and expensive) car parks adjacent to greenways. As per the government's Smarter Travel (2009) document, there needs to be a serious and substantial move towards public transport in order to reduce carbon emissions from transport.
- A Greenway Strategy must also include a strategy for long term promotion of any network developed. Examples of promotional methods abound throughout Europe in particular, and the opportunity to link into European funding for such promotional support should be seriously explored and referred to in the Strategy

With inspired political leadership, we look forward to seeing the publishing of the strategy before the end of this historic year – and the steady implementation of the strategy thereafter.

ENDS