

Ms. Sonya Kavanagh,  
Senior Executive Officer,  
Kildare County Council,  
Áras Chill Dara,  
Devoy Park,  
Naas,  
Co. Kildare.

Friday, 19 July 2013

**RE: Proposed Development of a Shared Pedestrian and Cycle Greenway Facility – Canal Harbour Maynooth to the Kildare Meath Border**

Dear Ms. Kavanagh,

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

**The Concept**

Firstly, An Taisce wishes to warmly welcome 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.

In line with the aims of the National Cycle Policy Framework (Department of Transport 2009), the proposed cycle greenway should help prompt an increase in cycling and walking on this corridor. The route is likely to appeal to several different types of users: firstly, the cycling visitors (or indeed 'natives') wishing to cycle all, or at least a significant length, of the longer Dublin to Galway route which will form part of the Euro-velo "Capitals" Route #2 (European Cyclists' Federation 2013); 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; and thirdly cycling commuters travelling between Kilcock and Maynooth (and perhaps Innfield and Maynooth) which may, of course, include students and staff of NUI Maynooth.

While we recognise the sharp differences between the landscape and topography of West Co Mayo versus that of Co Kildare, we note the Great Western Greenway has been a hugely successful project in the West, generating a lot of revenue for local businesses, and promoting the overall area. This was partly because of good design enabling inexperienced cyclists to enjoy the pleasures of being on bikes and positive marketing techniques persuading users to try it out, measures that should be integrated into all new cycle routes throughout the country including this Royal Canal Route.

### **Cross Sections**

An Taisce is aware that some stretches of the proposed canal route are currently well used by walkers for leisurely strolls, some of whom are also walking dogs. Therefore it is essential that the designers of the scheme approach the next stages in the design process while being especially sensitive to their respective needs. We also note the need to cater for fishermen/women and other types of users along the route.

An Taisce strongly recommends that the 3m greenway width, along most of the proposed route, is increased to *at least* 4m so as to provide pedestrians and cyclists moving in both directions with more room. 3m in width is simply far too narrow especially in the vicinity of the towns of Maynooth and Kilcock, which are likely to experience high usage. An Taisce acknowledges that the available width is constrained in several parts including along existing roads, adjacent to Maynooth College, under bridges and between Kilmore and Moyvalley bridges. Strong consideration should be given to acquiring additional land outside of the existing corridor where this may be required.

### **Public Art**

An Taisce acknowledges that very long stretches of cycle route through largely unchanging surroundings can create a less than ideally stimulating environment. Canal-side cycle and walking routes can suffer 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 Kildare County Council and the design consultants reflect on the great potential for enhancing the visual interest and place-making dimensions of the route by incorporating quality public art into the scheme. As well as perusing the following website: <http://www.sustrans.org.uk/ncn/map/information/national-cycle-network/art>, it is strongly recommended that the Local Authority invites a member of the UK Arts Development Board to Kildare so as to share UK NCN experiences on this subject with an Irish audience.

### **Other Design Elements**

At chainage 30200 there is a proposed 3m wide 'deck' over a canal overflow outlet. It is suggested that this be extended to a minimum 4m width for safety purposes.

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

There is an increasing trend to provide 30kmh speed limit zones in urban areas to improve safety and so enhance the urban environment especially from pedestrians' and cyclists' perspectives. 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 the Council introduce a 30kmh speed limit in these adjacent zones especially in the vicinity of the residential areas, schools and NUIM Maynooth - if these are not already in place.

### **Cycle Stands**

It is strongly recommended that the opportunity is seized to introduce plenty of (attractive and sheltered!) bicycle parking stands at amenities and in urban 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 (<http://www.cyclemanual.ie/manual/detailsright/bicycle-parking/>).

## **Ecological Issues**

The proposal concludes that a full EIA is not necessary from the screening process. However there appears to be a few incomplete elements within this screening report.

According to the ecological survey it is likely that Kingfisher (Annex I protected species) are abundant in the area because the Royal Canal provides ideal fishing conditions and earthen banks suitable for nesting. It is stated in the survey that more sightings were expected based on the habitat and previous work conducted in the area. However in the EIA Screening Report it states that it is not a habitat for Kingfisher based on Bird Watch Ireland 2010 surveys and also that there are no suitable nesting sites. This seems contradictory. An Taisce seeks a clarification on this matter.

The ecological survey states that land surrounding the Royal Canal provides a good habitat for Golden Plover (Annex I protected species) and that a flock was sighted. This species is not mentioned in the EIA Screening Report. It should be clarified whether or not the project is likely to have an impact on the species as this may require a full EIA to be conducted. The Black-Headed Gull (Red listed) and seven other species (Coot, Cormorant, Mute Swan, Snipe, Starling, Swallow and House Sparrow) which are Amber listed were recorded during the site visit but are not mentioned in the EIA Screening Report. Furthermore, according to the ecological survey the Little Egret (Annex I protected species), the Teal and the Wigeon (Amber listed) are also likely to use the canal but were not recorded on the site visit and were also not mentioned in the EIA Screening Report. These additional points require clarification.

Badger runs, scuffle marks and latrines were also found along the canal in the ecological survey but not mentioned in the EIA Screening Report. Badgers are protected by the Wildlife Act 1976 and the Wildlife Amendment Act 2000. An Taisce seeks a clarification on this matter.

An Taisce also wishes to query the conclusion that otters (Annex II protected species) will not be affected by the proposals. The basis for this determination was that there are no otter holts and that the otters are nocturnal - and therefore would not be affected. However, it is our understanding - through our contact with the Irish Wildlife Trust - that otters are not exclusively nocturnal and if there are badger slides and other markings (which there are), then there are most likely holts nearby, but they are often impossible to find. Therefore we think the contention that otters will not be affected requires further consideration.

The ecological report states that due to the time of year that the survey was conducted, the number of species of aquatic macrophyte was low and that more species would likely be present at a different time of year. It is suggested here that a more accurate survey may be required so as to ensure that an EIA is not necessary.

The ecological survey also notes that the site visit on dry calcereous grasslands (Annex I protected) was conducted at an inappropriate time of year to accurately measure its possible species etc and that a further survey was to be conducted in June. This further survey was not included in the proposal. Therefore the EIA Screening Report cannot possibly determine that these grasslands will not be impacted.

## **Conclusion**

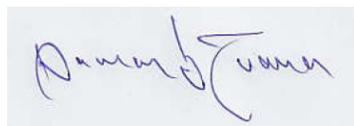
An Taisce warmly welcomes the construction of a high quality cycling route along this corridor. We believe that the facility has enormous potential to help create (or enhance) a wonderful existing tourism and recreational product for those in the East, the Midlands and the West.

We are however concerned that the facility is let down by its sub-optimum width along much of its length and that insufficient attention has been given to advancing other supportive cycling- and pedestrian-friendly interventions such as 30kph zones and more cycle stands. Furthermore we would like to highlight the great potential that public art has to enhance the facility in the way it has done for the NCN in Northern Ireland and Britain. Finally we seek a number of clarifications on the ecological aspects of the proposals and look forward to receiving these at your earliest convenience.

An Taisce trusts that our commentary will assist Kildare County Council with its further considerations and preparations of this proposal.

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

Yours sincerely,



**Damien Ó Tuama**  
**National Cycling Coordinator**  
**Damien.otuama@gmail.com**

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## **REFERENCES**

Department of Transport (2009), 'National Cycle Policy Framework', (Department of Transport).  
European Cyclists' Federation 'Eurovelo - The European cycle route network ',  
<<http://www.eurovelo.com/en/images/eurovelo-map>>, accessed 18/July 2013.