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Sunday, 26 October 2014

Proposed West Clare Railway Greenway Phase 1 – Ballymaquiggin – Part 8 Planning Application

Dear Sir / Madam,

I refer to the consultation process on 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 for more information on the ECF.

As can be seen below we endorse the overall concept of the proposed long term Greenway route, but we are extremely disappointed with the unacceptable design of the town section of this proposal. We urge Clare County Council to return to the design of this section of the proposed route, as it fails to meet even the minimum required standard, and will not encourage increased local rates of cycling, or entice cycling tourists. A route of this nature needs to be designed to a world class standard, to sit within a broad European wide cycle network.

1. Endorsement of the Concept of a 33km long Ennis to Lahinch Greenway

On behalf of Cyclist.ie and An Taisce, I would like to express strong support for the concept of the development of a 33km long greenway running from Ennis to Lahinch running along the corridor of the West Clare Greenway. This project has the potential to create a truly stunning amenity traversing a beautiful landscape and revitalising a historical rail route in a new guise. The project would link with Euro Velo Route #1, the Atlantic Coastal Route of the trans-European 'EuroVelo' cycling routes (European Cyclists' Federation 2013). Cyclist.ie and 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 route will bring additional tourism into the towns along the route. Furthermore, it will offer a valuable amenity to help persuade already-committed visitors to County Clare to stay a little longer and persuade others to visit the area for the first time. It has great potential to become a valuable recreational, economic and social resource for the area – in the way that the very successful Great Western Greenway has become for Mayo. Moreover, it will give those attending local festivals and various events additional ways to spend their time and this will help to nurture strong local cycle hire and guided cycle tour businesses – thus creating further employment in County Clare.

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 in Co. Clare. 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;

- thirdly, cycling commuters and utility cyclists travelling (in particular) into Ennis town and other towns along the route so as to access a range of amenities (shops, leisure facilities, schools, employment centres etc.) via quieter and safer routes.

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



Figure 1 – Euro-velo Network. Euro-velo Route #1 "Atlantic Coast" runs from Scandinavia to the Algarve via Co Waterford (European Cyclists' Federation 2013)

2. Poor Quality of Facility from Ennis as far as the Rail Line

2.1 General Points

While the western-most part of the route promises to be a fabulous facility, we have serious concerns over the quality of the design of significant sections of the proposed route from Ennis town centre as far as the disused rail line. There is little evidence that the proposed designs are consistent with the thinking permeating the National Cycle Policy Framework, NCPF (Ref 2)) or have followed the guidance set out in the National Cycle Manual, NCM (Ref 5), or have even considered the most recent guidelines from the Department of Transport as set out in the DMURS (ref 3).

More specifically, in too many locations, the cyclist is treated as a pedestrian on wheels and asked:

(ii) to share very narrow / sub-standard width footways with pedestrians
(iii) to take right-angled turns onto and off footways
(iv) to give way at entrances/exits to various premises
(v) to give way at very minor side roads
(vi) to cycle around tight corners on share-used pedestrian/cycle facilities
(vii) to make completely unorthodox manoeuvres across the face of junctions while on two-way cycle facilities shared with pedestrians

Furthermore, the design approach seems to be predicated on removing little or no general road space in favour of bicycle use; the design philosophy appears to be more about taking the cyclist off the road and onto a footway rather than examining the potential to redesign the street landscape in line with the Guidelines of DMURS (Ref 3) . Unfortunately the result of this approach is to create a poor quality design which is not in keeping with required design standards. Overall, this represents a lost opportunity for Clare County Council to create, what Mayor of Clare Cllr. Joe Arkins recently described as, a (potential) “world-class off-road recreational path similar to the ‘Great Western Greenway’ in Mayo” (Davis 2014). Below specific locations and problems are highlighted .

2.2 From West side of Ennis Tennis & Badminton Club to Youth Centre near roundabout (Drawing R-2014-51.1-017)

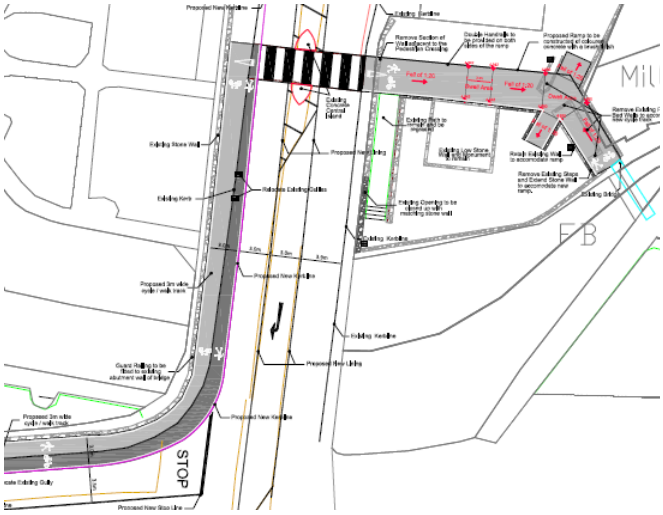


Figure 2 – Mill Road junction

- cyclists are taking 90 degree turns onto/off shared use footway (Figure 2)
- cyclists are routed around corner on shared use path (Figure 2)
- cyclists lose priority at access to car par
- the roundabout continues to have a double lane entry on Cloughleigh Road

2.3 Cloughleigh Road (C to D)

- it is proposed to mix pedestrians and cyclists on a footway by removing the grass verge and widening the path in places. This is a lost opportunity to create a wide high quality wide cycle lane on either side of the road, a space in which cyclists will not be competing with pedestrians outside a school (a location at which one can assume walking school children will pour out onto the path and make the shared facility difficult to use for both sets of users)
- There is obviously a problem with illegal parking at this location (Figure 3). Possible solutions here include bringing An Garda Siochána on board to enforce existing regulations and/or considering providing some sort of physical segregation between cycle tracks on either side of the road and the main carriageway (Cf. Figure 4 below – Grand Canal Cycleway)



Figure 3 - Cloughleigh Road looking West



Figure 4 – Grand Canal Cycleway in Dublin showing physical segregation between track and main carriageway a (part) deterrent to illegal parking

2.4 Cloughleigh Road to Drumcliff Road (Drawing R-2014-51.1-019 – Figure 5 below)

- Cyclists lose priority over traffic entering/emerging from Aureen Drive / there is no attempt to tighten up this junction with the side road
- Cyclist needs to squeeze between gaps of approx 1.75 metres between guard rails and stone walls before traversing two 90 degree turns, giving way to traffic accessing the housing estate and then gaining access to Drumcliff Road via an unorthodox route
- This is not of the quality one expects on a top quality cycling route. This needs to be revisited

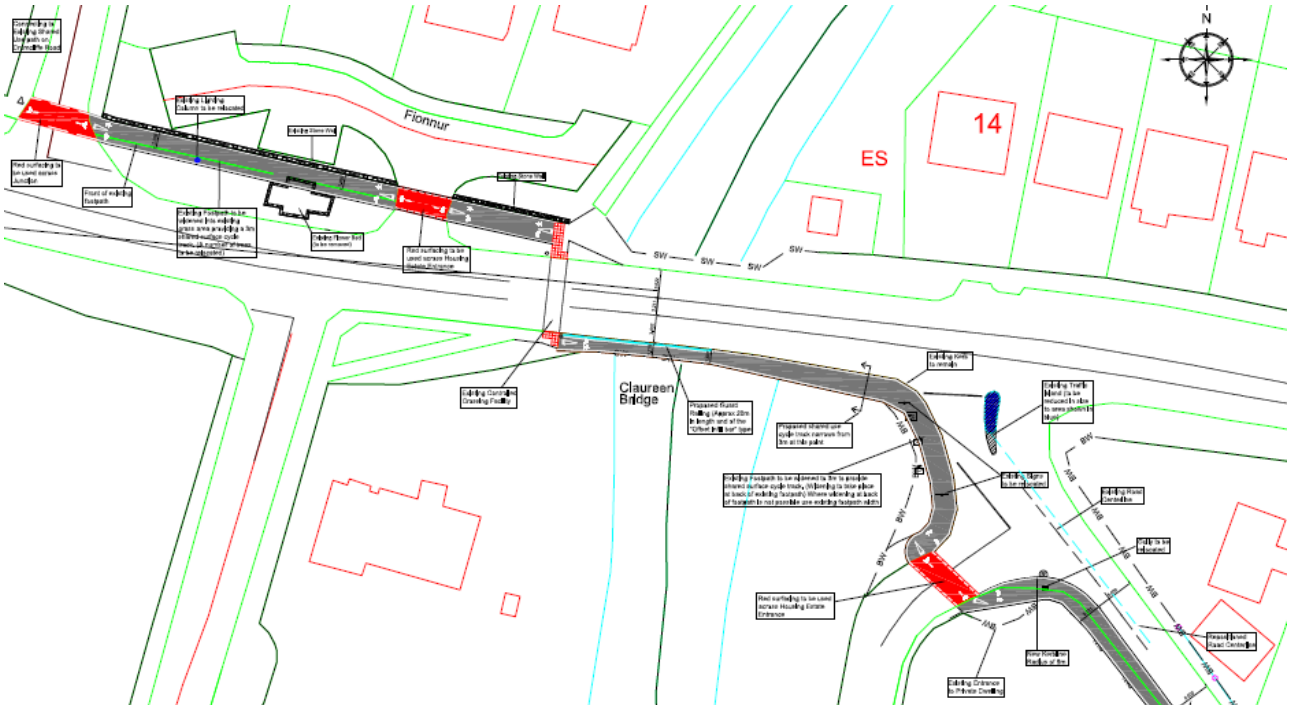


Figure 5 - Convoluted route for cyclists with multiple losses of priority

2.5 Drumcliff Road – Lees Road

- Loss of priority a side-roads for cyclists when using the facility (Figure 6)



Figure 6 - Drumcliffe Road looking West

- It is unclear why an off-road facility is required on Lees Road (Figure 7), a cul-de-sac with a 15km/hr speed limit, traffic calming facilities on the road and (it is assumed) low traffic volumes. Surely this is an ideal environment for all cyclists to be on the road and/or for the creation of a cyclist priority route, where cyclists and pedestrians take priority over motor vehicles?!



Figure 7 – Lees Road looking West

2.6 Skate Park to Forest Track

- It is unclear why an additional cycleway is being created behind (i.e. at the northern edge of) the pitches when there is an existing track on the other side of them (Figure 8).

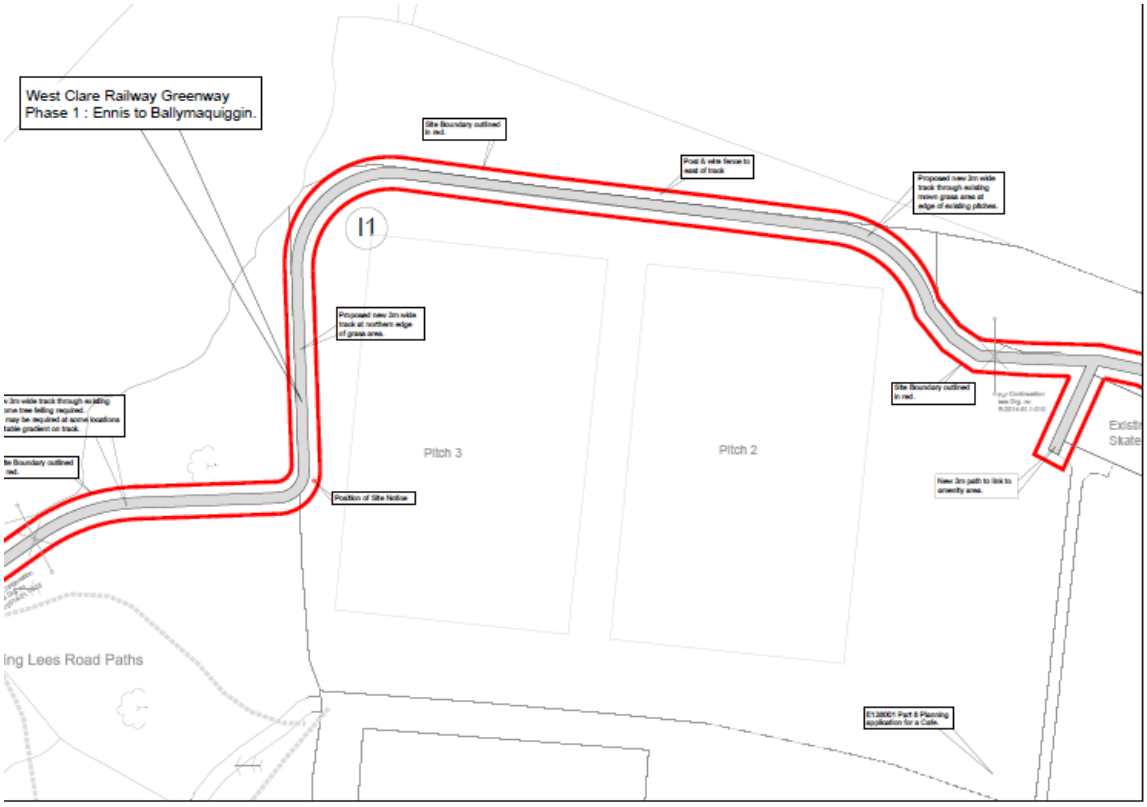


Figure 8 – Lees Road Sports and Amenity Park

2.7 Forest Track to Disused Rail Line

- This part of the route is, undoubtedly, a gorgeous stretch – and, with a seamless link to the greenway along the disused rail-line, will create a wonderful start to the longer leg to Lahinch.

3. Further Points

3.1 Making All Roads in Couty Clare Safe for Cycling – as well as Creating Greenways

One concern we have with cycleways / greenways is that they can sometimes 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 else (e.g. local parks) in order to cycle or walk.

So, while greenways and trails have an important role to play as amenities for those who don't feel comfortable in hostile car-dominated traffic, 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.

3.2 Biodiversity and Enhancing the User Experience

The route will enable users to enjoy a direct experience of the natural biodiversity of the area. Therefore it will be beneficial to 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.

As regards the construction and maintenance of the greenway, we stress the need for:

- Vegetation clearance 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 to be carried out only where absolutely necessary

In addition to these, we suggest that:

- the use of heavy machinery is avoided where at all possible
- hedgerows are left “wild” ie untrimmed wherever possible
- lighting options are sensor-activated so that illumination is minimised.

3.3 Safer 30kmh Speed Limits for Roads in Adjacent Urban Areas

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 9 below (T. a. S. Department of Transport and Department of Environment 2013).

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 Clare 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).

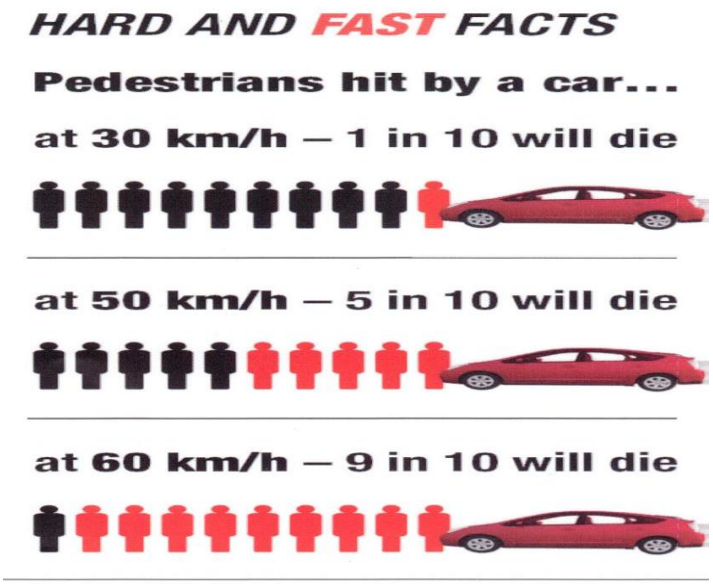


Figure 9 – Outcomes from Car Impacts with Pedestrians as a function of speed

3.4. Bicycle Parking along the Route

It is strongly recommended that the opportunity is seized to introduce plenty of (attractive and sheltered!) 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 (National Transport Authority 2011).

3.5 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 on the road.

3.6 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 (2014) as per the list of references in Appendix I.

3.7 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.

3.8 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/colleges directly adjacent to 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 this 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 its success.

4. Conclusion

Cyclist.ie warmly welcomes the construction of high quality greenways but we need to highlight where proposed facilities in urban areas are of a design standard that will not provide the conditions that cycling tourists expect or locals new to cycling deserve. We recommend that Clare County Council liaise closely with the National Transport Authority in regard to the redesign of the urban / urban to rural transition parts of the scheme.

Cyclist.ie trusts that our commentary will assist Clare 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 faithfully,

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cyclist.ie
the Irish Cycling Advocacy Network
EuroVelo
the European cycle route network
ECF
EUROPEAN CYCLISTS' FEDERATION

APPENDIX I – REFERENCES

1 Davis, Stephen (2014), 'West Clare Railway Greenway project is on track', The Clare Herald, 15/May 2014.

2 Department of Transport (2009), 'National Cycle Policy Framework', (Department of Transport).

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

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

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

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