The Tailor's Hall, Back Lane, Dublin 8.
E: Damien.otuama@antaisce.org
T: 01-7077064
M: +353-87-2840799

The Strategic Infrastructure Division,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Wednesday, 18 June 2014

Limerick Smarter Travel Route 2 – Walkway/Cycleway

Dear Sir / Madam,

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 Programme 2013-14 (ECF 2014). Our observations are presented in points 1 to 16 with references listed on the final page.

Benefits of the Scheme

1. On behalf of Cyclist.ie and An Taisce, I would like to express strong support for the proposed scheme. This project has the potential to create a very attractive and comfortable route for people on bicycles and on foot (including the mobility impaired) linking the University of Limerick (UL) to the city centre via the canal side route, and linking UL to Athlunkard/Westbury via the new Shannon Fields greenway.

2. In line with the aims of the National Cycle Policy Framework (Department of Transport 2009), the proposed greenway will help prompt an increase in cycling and walking in Limerick. The route will appeal to several different types of users: firstly, (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; secondly, utility cyclists wishing to access the university and a range of amenities (shops, leisure facilities, schools, employment centres etc.) via quieter and safer routes. It is noted that this project was identified in the Limerick City Cycle Network Strategy (2004).

3. It can be expected that the facility will reduce local car usage in the area thus helping to relieve local congestion in the surrounding estates and roads. The amenity could also be used creatively so as to get school children back cycling again and developing life-long healthier habits.

4. It is noted also that this facility will link with Euro Velo Route #1 (Figure 1 below), a long-distance route for recreational cycling running along the West coast of Norway, Scotland, Ireland and France. Therefore, the facility can be expected to support cycle tourism in the West of Ireland and bring cycling visitors into Limerick city. Furthermore it will give those attending local conferences (in UL) and various events additional ways to spend their leisure time and this will help to nurture strong local cycle hire and guided cycle tour businesses – thus creating further employment opportunities in Limerick.



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

Addressing Ecological and Walkers' Concerns and Reducing the Speed of Motor Vehicles in Adjacent Areas

5. 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.

6. We note in this case that the route runs along the original towpath adjacent to the river and either immediately adjoins or runs through parts of the Lower River Shannon candidate Special Area of Conservation (cSAC). We stress the need for the proposals to respect the environmental sensitivity of the area in terms of the materials used, construction methods employed and types of lighting introduced. In terms of making lighting bat-friendly, we refer you to Sustrans' publication "Lighting of Cycle Paths" (2012: 12-13).

7. We note also the concerns of some respondents to the stakeholder consultation process regarding "existing cyclists' lack of respect or empathy for pedestrians" (Punch Consulting Engineers and Mouchel 2014: 19). In response to these concerns, we suggest the following to Smarter Travel Limerick:

8. Promote the route (in all media used) as an easy-going and leisurely route to/from the university along the riverside – rather than a speedy commuter route. In such materials, promote 'plain clothes' (family) cyclists over sports/sporty cyclists since the latter group are generally more associated with speed.

9. Issue a 'Cycling code of conduct on shared-use paths' such as that developed by Sustrans' (Undated) – and this could be circulated online, as a flyer at/after the launch of the scheme, through the university and other organisations, etc.

10. Consider the scope for having a slightly wider boardwalk (along some of the sections) than that shown in the drawings. While it is indicated that 3m is the width of the boardwalk, the effective width is narrower than 3m (when one considers the need for a gap between the handlebar of a bike and adjacent vertical fences etc. (see for example National Roads Authority 2014: 12).

11. One concern we have with cycleways / greenways is that they can generate the idea that cyclists have no place on the ordinary roads. Since there is insufficient attention being paid to improving driving (and indeed cycling) standards on Local Authority managed roads, 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 much traffic - where cycling 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 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.

12. 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 Design Manual for Urban Roads and Streets (DMURS) encourages the further use of 30km/h zones, and outlines the safety differences of different speed levels - Figure 2 below (T. a. S. Department of Transport and Department of Environment 2013). Given the likelihood of increased numbers of cyclists and pedestrians accessing the greenway at various access points along its length, it is strongly recommended that Limerick City/County Council introduce a 30km/h speed limit in areas adjacent to the greenway - residential areas, schools, sports grounds and other busy locations (if not already in place).

Cycle Parking, Public Art, Maintenance, Green Schools

13. It is strongly recommended that the opportunity is seized to introduce plenty of 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).

14. 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 (2014). 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 into the overall scheme – ideally art that resonates with the historical character of the area.

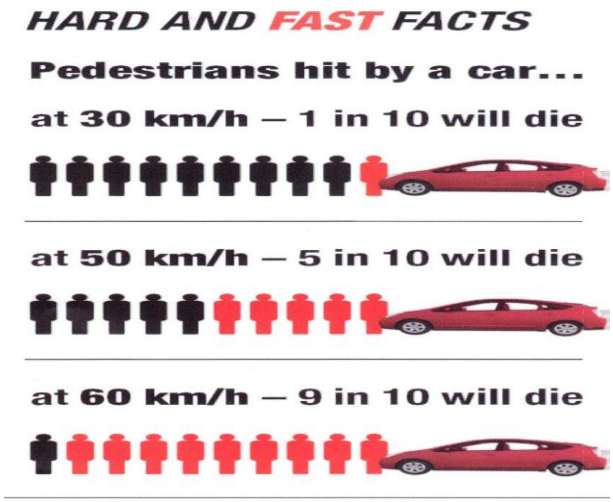


Figure 2 – Outcomes from Car Impacts with Pedestrians as a function of speed

15. An essential part of a successful cycleway/walkway 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.

16. The *Green School Initiative* is a highly publicised, student-led initiative operated by An Taisce. Sustainable travel is an integral part of the programme. We note that there are a number of schools/colleges directly adjacent to the proposed scheme. We would encourage you to assess if those institutions 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 of the proposed route, thus facilitating in its success.

An Taisce trusts that our commentary will assist 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,

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

APPENDIX I – REFERENCES

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

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

ECF 'European Cyclists' Federation (ECF) Leadership Programme', <http://www.ecf.com/leadership-programme/>, accessed 18/June 2014.

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

Limerick City Council (2004), 'Limerick City Cycle Network Strategy '.

National Roads Authority (2014), 'Rural Cycle Scheme Design. Volume 6 Section 3 Part 5 NRA TD 300/14'.

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

Punch Consulting Engineers and Mouchel (2014), 'Limerick Smarter Travel - Route 2. Planning Report'.

Sustrans (2012), 'Lighting of Cycle Paths. Technical Information Note No. 29 '.

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

--- 'Cycling code of conduct on shared-use paths', <http://www.sustrans.org.uk/change-your-travel/get-cycling/cycling-code-conduct-shared-use-paths>, accessed 16/June 2014.