



Galway Cycling Campaign

<http://www.galwaycycling.org/>

Observations on the Draft National Planning Framework – Ireland 2040

November 2017

Note on format. The Galway Cycling Campaign has been making submissions on matters of relevance to the draft National Planning Framework for nearly two decades. Accordingly it is difficult to know where to start. For our areas of interest we broadly welcome the stated intentions in the Draft Framework but have concerns around delivery. For the sake of space and time we have pulled out several areas where we perceive gaps in the document and which tie in with other discussion papers that we have to hand.

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Issue: Cycling and walking

A word search on the document throws up the following.

- Cycle 12 hits
- Cycling 19 hits
- Walking 19 hits
- Walk 2 hits
- Permeability 1 hit

Clearly sustainable transport is getting some consideration and this is welcome. There is reference to compact urban forms and making urban places more attractive and safer. There is reference to comprehensive networks of safe cycling routes, safe cycle lanes, supporting public transport, walking and cycling, particularly prioritising walking and cycling accessibility. This is all good however it is all meaningless aspiration unless how it is to be achieved is clearly defined. As we deal with below, our towns are managed by officials who have a conflict of interest and who have clear financial incentives to prioritise cars at the expense of access and safety for people on

foot or on bikes. It cannot be left to the same people to define what is meant by “accessibility” or “safe” or “prioritising”. The way to resolve this conflict of interest is to define a standard reference point for what constitutes workable cycling infrastructure. This reference already exists in the form of the 2009 National Cycle Policy Framework (NCPF copy attached). The NCPF sets out a systematic approach for identifying and remedying built infrastructure that creates safety and access problems. It defines what dysfunctional roads infrastructure looks like and what functional “cycling friendly” infrastructure looks like. To be credible on sustainable transport the Draft Framework must reference the NCPF explicitly. Perhaps through rewording National Policy Objective 28 as follows.

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by implementing the National Cycle Policy Framework, thereby integrating physical activity facilities for all ages, particularly prioritising walking and cycling accessibility to both existing and proposed future development, in all settlements.

Issue: The Irish state’s promotion of private car use

The reason Ireland has become so car dependent is because the promotion of private cars has being the overwhelming goal of state actors for many decades. In our reading of the Draft Framework we do not see any clear understanding or commitment that might address this situation and reverse it.

The phraseology around sustainable transport is passive and arguably misses the point. Words used in relation to sustainable transport are “support”, “enable”, “encourage”, “prioritising” and so on. This misses the elephant in the room. If the goal of state actors is promote private car travel then monies directed towards other transport modes will be used for that goal. It is a common experience across Ireland that existing “facilities” – cycle tracks, pedestrian crossings etc have the apparent purpose of managing and controlling vulnerable road users for the benefit of motorised traffic. It is not credible to allow roads engineers to optimise roads around “flow” for cars then speak of creating safe attractive walking and cycling facilities within the same space. You can have one or the other but not both. On Page 79 (Healthy Communities) the draft framework states;

Countries with extensive cycle infrastructure report higher levels of cycling and lower rates of obesity.

This misses a fundamental part of the picture. Most other countries in Northern Europe but in particular the Netherlands, Denmark and Germany also follow active traffic reduction programs. In these countries road infrastructure is managed to actively exclude inappropriate motor traffic from unsuitable locations. Ireland takes a fundamentally opposed approach which is that all roads are open to all cars regardless of trip purpose. Places that construct extensive cycle infrastructure but also strive to make motoring more attractive do not show high levels of cycling – Stevenage in the UK being a prominent example¹.

In Ireland – car parking income gives local authorities a clear and undeniable financial incentive to promote private cars and discourage other forms of transport. We attach a copy of our discussion paper “*Addicted to cars; the role of car parking revenue for Irish local authorities and implications for state policy.*” Irish local authorities profit financially by removing road capacity from people who walk or cycle. So long as this continues state claims of supporting, enabling, encouraging or prioritising walking and cycling are not credible.

Ireland has also made fundamental mistakes in the management of its national roads infrastructure. For more detailed discussion we attach our recent submission to the Citizens assembly: *Submission on How the State can make Ireland a leader in tackling climate change August 2017*. In it we examine road policy in other countries and contrast that with Ireland. We argue that the ongoing motorway program has been a transport disaster for the state. The state needs to abandon the current motorway program and revert to the approach set out in the 1998

¹ For a discussion of Stevenage see <http://www.roadswerenotbuiltforcars.com/stevenage/>

roads needs study - based on upgrading existing links and constructing a system of town and village bypasses. The Irish state cannot credibly talk of emulating the cycling infrastructure of other countries unless it also follows the practices that provided the space for that infrastructure.

Issue: Greenways and Empowered Rural Communities

There are 6 references to greenways in the draft Planning Framework document. There is some discussion on page 73.

Complementary to 'harder' infrastructure projects related to transport, energy and communications, the development of greenways and blueways offer a unique alternative means for tourists and visitors to access and enjoy rural Ireland. The development of a strategic national network of Greenways and Blueways is a priority for Ireland 2040.

It is unclear what is meant by "unique" as the development of long-distance cycling routes is standard practice elsewhere in northern Europe. Since there is limited scope for dedicated greenways perhaps what is meant is "isolated" as in *provides an isolated means for tourists and visitors to access and enjoy*. On page 136 it states "A strong start has also been made in the development of a national long-distance Greenway/Blueway Network". This claim is not supportable. Arguably the conduct by the DTTaS of various greenway projects has been a disaster for cycling and for the brand of cycling in rural Ireland. The conduct of the Dublin-Galway proposals and the Galway-Clifden proposals have been profoundly flawed. Avoidable problems and disputes have also been created in Kerry, Clare and Cork. Overall the conduct of the National Cycle Network proposals and greenway proposals have raised well-founded concern regarding institutional issues and attitudes within Transport Infrastructure Ireland and the Department of Transport Tourism and Sport. There have been limited successes such as Westport to Achill and Waterford. However converting a disused railway in state ownership to a cycle route is not rocket science. It has been standard practice elsewhere in Europe for decades. The popularity of routes like the Waterford greenway has not surprised anybody in the cycle campaigning community and is entirely consistent with experience elsewhere. The fact remains that it took Ireland until the second decade of the 21st century to start making progress on this type of route provision over "longer" distances (they are "long" only in the limited Irish understanding of the term). While it can be acknowledged as a faltering start this is not something for the Irish state to be proud of.

To give a flavour of the issue we attach two documents dealing with recent DTTaS consultations.

1. December 2016 Eurovelo 2 Galway – Moscow: Department "consultation" sets up more conflict with local communities.
2. Submission on the DTTaS Greenway Development Strategy Consultation 14 July 2017

Page 73 of the Draft Framework indirectly references the controversy this with this statement

Due to the cross-sectoral nature, extensive reach and elements of land take associated with a national Greenways and Blueways Strategy, the support and buy-in of local communities, landowners, local authorities and stage agencies is critical to the successful implementation of a national network, which must also be supported by an investment and co-ordination plan.

An approach based on primarily on dedicated greenways rather than implementing the National Cycle Policy Framework is inherently confrontational. In essence this is state actors saying that rural cycling will be provided for by constructing new roads through rural communities. In terms of cycling policy, it is an extreme position that does not comply with best practice elsewhere and increases the likelihood of confrontation with local landowners and rural communities. Rather than being "rural development" an isolated greenway program is better characterised as a "display of power" by Dublin based civil servants.

Overall it is clear that the needs of rural communities cannot be met by an "isolated" focus on greenways or blueways. Rather than being a way forward, an approach focussed mainly on greenways and "blueways" will have

the real effect of depriving many rural communities of opportunities for walking and cycling. The best way to provide for the needs of the greatest number over the greatest area will be to systematically implement the National Cycle Policy Framework (NCPF). Implementing the NCPF will provide greenways but also a mixture of route types similar to those found across Northern Europe.

At the moment in the draft document National Policy Objective 23 states
Facilitate the development of a National Greenways/Blueways Strategy which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.

This wording should be removed and replaced with a wording based around the delivery of the National Cycle Policy Framework.

Policy Objective 23

Provide rural communities with opportunities for walking and cycling through the systematic implementation of the National Cycle Policy Framework. With a focus on local routes growing progressively together into a national network of routes serving the greatest number of people.

Issue: Retail services and the Draft National Planning Framework.

Keeping adequate retail services within reasonable walking or cycling distance of the populations they serve is fundamental to avoiding unneeded use of private cars. The Draft National Planning Framework makes limited reference to retail, shops or shopping. On page 38 it talks of compact forms increasing the viability of services and shops. On page 41 it talks of over development of city edges and the undermining of urban places. On page 129 it discusses the location of services as if it is merely a matter of zoning. This misses the point in our view. The decline of our urban centres is the result of a range of policy decisions - including some outside planning but which have reinforced the effect of poor planning practices. In particular, things like the abolition of the groceries order have allowed predatory practices by large multiples focused on out of town shopping centres. Likewise allowing out of town shopping centres to operate in a laissez faire manner and to offer free car parking amounts to the state allowing an unfair competitive advantage to unsustainable practices at the expense of our existing town centres. It is arguably pointless zoning land for retail at more sustainable locations if unfair competition renders them non-viable as business locations. The state needs to introduce strong measures to level the playing pitch in favour of sustainable and appropriate retail services. Two key measures are

1. The restoration of the Groceries Order
2. The introduction of a car parking levy on out-of-town shopping centres

Please find attached two previous submissions on both issues.

- Comments on Groceries Order – Irish Cycling Campaign 2005
- Addicted to cars; the role of car parking revenue for Irish local authorities and implications for state policy. Pre-Budget 2017 discussion document Galway Cycling Campaign – see section on Strategic Parking levies

Issue: Galway City: Ardaun

Page 59 refers to the Galway City Council Ardaun proposals for a new residential development on the east of the city. In our view, in their current state, the Ardaun proposals are unsustainable and amount to the imposition of planned car dependency. The proposed location is inherently hostile for cyclists and pedestrians and in particular is inherently hostile for children. The Ardaun proposals are demonstrably non-compliant with the available guidance such as the *Design Manual for Urban Roads and Streets*, the *National Cycle Policy Framework* and *NTA Permeability Guidance*. Please find attached a recent Galway Cycling Campaign submission on the Draft Ardaun

Local Area Plan this provides more detail on the problems with this site. References to Ardaun should be removed from the Draft National Planning Framework.

Issue: Galway City: Development of a strategic cycleway network with a number of high capacity flagship routes.

For Galway this “strategic cycleway network” proposal is stated on page 59 of the draft Framework: It is difficult to know where to start with the attitude of the Galway City Council executive to walking and cycling. Some of the attached supporting documents give a flavour of what has happened and continues to happen in Galway. As one illustration, by our estimation there are not more than 200 municipal bike parking spaces in Galway City Centre. Although there are several third level colleges within kilometres of the city centre this would not be enough bike parking to cater for even 2 per cent of the third level students. The obvious conclusion is that cyclists are not welcome in Galway City. As another illustration, the Galway bike share scheme is the worst performing in the country. Galway City Council arguably sabotaged both cycling and the bike share scheme in the manner in which it was introduced. Space for the bike share stations was found by removing existing bike parking stock and replacing it with bike share stations. The bike share scheme was also supposed to be accompanied by the provision of two-way cycling on one-way streets. This has been provided for in Irish traffic regulations since 1998 and was an objective of successive city development plans. It has not happened. If the state wishes cycling to grow in Galway then it needs to 1. Remove financial incentives to promote car use 2. Impose, if necessary by ministerial order, the implementation of the National Cycle Policy Framework.

Issue: Galway City: Delivery of the Galway City Ring Road.

In our submission on Climate Change to the Citizens Assembly we argue strongly for the abandonment of motorways in favour of a national system of ring roads. If used as part of sustainable practices, the purpose of ring roads or bypasses is to eliminate through-traffic from unsuitable locations. Galway City self-evidently does not have a problem with through-traffic. Galway has a problem with traffic that has the city as its destination. This type of traffic is dealt with by displacing it onto alternatives such as walking, cycling and public transport (for instance Park and Ride). In transport terms, it is unclear how the current Galway ring road proposals could be intended to do anything other than reinforce and encourage the greater use of private motor cars in Galway. This aligns with our previous observations that Galway City Council has a clear and undeniable financial incentive to grow car use and discourage other forms of transport (See attached Budget 2017 submission on parking income and local authorities). This also aligns with the current Galway City proposals for residential developments that are inherently car dependent such as at Ardaun. An additional explanation that has been advanced for the Galway ring road proposals is that they are intended to open certain lands for development. In effect that they are intended to create the kind of edge city effect that the draft Planning Framework is supposed to avoid. In that regard the Galway ring road proposals would seem to be repugnant to the intent of the Draft National Planning Framework and should be removed from the document.

Ireland's First National Cycle Policy Framework



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Foreword

by the Minister for Transport



Cyclists matter.

Just like other road users they deserve a safer, easier travelling experience and that's what I propose to deliver with Ireland's First National Cycle Policy Framework. I firmly believe that with the actions set out in this document we can look forward to the prospect of a new culture of cycling in Ireland by 2020. I want to see 10% of all trips to work being made by bike within the next twelve years. That will mean an extra 125,000 people commuting to work by bike. That's a lot of people but by working together I am confident that it can be done.

Over recent years, despite various attempts to improve the lot of the cyclist, including limited investment in cycle lanes and facilities, the popularity of cycling has steadily declined. The numbers using the bike for commuting fell from 7% in 1986, to 4.2% in 1996 and to 2% in 2006. As we become increasingly aware of issues such as lengthening journey times, traffic congestion and greenhouse gas emissions from vehicles on the one hand and the health benefits of pursuing more active lifestyles on the other, a return to the bike becomes a very sensible option.

A key lesson that we have learned in producing Ireland's First National Cycle Policy Framework is that no single action will prompt people to cycle. That is why this policy framework outlines a comprehensive package of interventions to make cycling not only easier but safer too.

I know that if we are to meet our ambitious target of 10% commuting by bike by 2020, it will be a major challenge for everyone involved. We will need to innovate, adopt new ways of working together and radically change public attitudes towards cycling.

Not only am I up for the challenge but I firmly believe that we can do it.



Noel Dempsey T.D.
Minister for Transport





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Executive Summary

This document sets out the National Cycle Policy Framework, 2009-2020. The backdrop to this policy is the Government's new transport policy for Ireland 2009 - 2020 *Smarter Travel - A Sustainable Transport Future*.

Vision / Reasons to Promote Cycling

The mission is to create a strong cycling culture in Ireland. The vision is that all cities, towns, villages and rural areas will be bicycle friendly. Cycling will be a normal way to get about, especially for short trips. Cycling contributes to improved quality of life and quality of the public realm, a stronger economy and business environment, and an enhanced environment. A culture of cycling will have developed in Ireland to the extent that 10% of all trips will be by bike by 2020.

Decline in Cycling Numbers

Cycling has been in steep decline since the 1980's. In 1986 a total of 23,635 primary level pupils cycled to school whereas in 2006, only 4,087 primary school pupils cycled to school (a decline of 83%).

Why a National Cycle Policy Framework (NCPF)?

International experience indicates that having an NCPF can be a powerful tool to encourage cycling in urban areas. Such a framework can provide a common, integrated basis for the long term development and implementation of cycling policies among various sectors and levels of government. The preparation, and implementation, of an NCPF is part of the contribution to a sustainable travel vision, and contributes to cultural development.

Criteria for Success

The most important factors in ensuring that an NCPF is successful are as follows:

- The participation of many stakeholders across several government departments, many agencies, all local authorities and other non-governmental organisations and institutions.
- Appropriate levels of, and timely, funding for the initiatives.
- The knowledge and human resources available to implement the policies.
- Legislation and Enforcement.

Breadth of Interventions

There is no single action that will prompt people to cycle. There needs to be a wide package of measures to reverse the decline in cycling numbers. These measures need to integrate with wider transportation policies as well as other policy fields such as land-use planning, road safety and health. The efforts of formulating and implementing all of the policies must be maintained over the long-term. Broadly, the interventions can be grouped into:

- Planning and Infrastructure
- Hard (Engineering Measures).
- Communication and Education
(Soft Measures).

Safety is covered by both of these headings. It is also covered in Legislation/Enforcement and Policy Evaluation.

Interventions - Planning and Infrastructure (Chapter 2)

At the highest level, all planning should consider the needs of cyclists. This should be articulated in all National, Regional, Local and sub-local plans. Cycling friendly urban planning principles will cover the need to keep distances between origin and destination short, through making developments permeable (i.e. easy for pedestrians and cyclists to pass through without making long detours) and well connected.

Transportation infrastructural designs need to be cycling friendly. Cycling-friendly means that routes taken by cyclists are safe, direct, coherent, attractive and comfortable. It is acknowledged that the quality of the dedicated cycling facilities designed and constructed to date in Ireland has been inadequate. In many cases, their provision has not, generally, led to an overall increase in cycling numbers. A new approach is required in which a “hierarchy of measures” is followed. The focus needs to be on:

- reducing volumes of through-traffic, especially HGVs, in city and town centres and especially in the vicinity of schools and colleges;
- calming traffic / enforcing low traffic speeds in urban areas;
- making junctions safe for cyclists and removing the cyclist-unfriendly multi-lane one-way street systems.

The other interventions include the following:

- Schools will be a strong focus of the NCPF.
- we will support the provision of dedicated signed rural cycling networks building on Fáilte Ireland’s Strategy to Develop Irish Cycling Tourism. This will cater for recreational cyclists as well as visitors.
- we will ensure that all surfaces used by cyclists are maintained to a high standard and are well lit.
- we will ensure that all cycling networks – both urban and rural – are sign-posted to a high standard.
- we will support the provision of secure cycling parking at all destinations of importance to the cyclist.

- we will pay special attention to integrating cycling and public transport (PT). As commuting distances are lengthening, the importance of combining the bicycle with the bus, tram or train grows. We will provide state-of-the-art cycling parking at all appropriate PT interchanges and stops. We will also ensure that intercity and suburban trains have proper provision for the carriage of bikes – either on all services or (in the case of sub-urban trains) on off peak (counter-peak) services.
- we will create municipal bike systems to complement the other elements of a radically improved public transport system.

Interventions - Communication and Education (Chapter 3)

We will use marketing tools to improve the image of cycling and to promote its use to all of the main target groups. The marketing effort will concentrate on countering cycling's poor image and selling the benefits – the freedom and flexibility it offers, the health benefits, its speed in congested urban areas etc. We will organise a National Bike Week having learnt from the experiences of similar events abroad. We will produce information and material to help promote cycling and address some of the myths, such as that "It rains all of the time".

We will work to improve the standards of cycling and cycling behaviour. This we will do through developing and implementing a National curriculum on cycling training. Cycling training will also be available for adults – both those returning to cycling and those who have never cycled before.

We recognise the importance of changing driving behaviour so as to improve the safety of all vulnerable road users, especially cyclists. We will revise the Rules of the Road so that cyclists' needs are better understood. We will work to improve driver instruction standards. We will pay special attention to bus driver training and that of heavy goods vehicle drivers.

We will pursue the introduction of fiscal incentives to promote cycling. These will include measures to allow for the purchase of subsidised bikes.

Instruments - Financial Resources (Chapter 4)

The fiscal benefits of cycling include the value to the health service as a result of not having to treat illnesses which result from physical inactivity. There are also gains in productivity arising from reduced absenteeism and having a fitter and more alert work force. Increased cycling numbers means less urban congestion, thus benefiting businesses.

Cost benefit analyses (CBA) attest to the fact that investments in cycling outweigh the costs to a far greater extent than investment in other modes.

For example, Benefit / Cost ratios of 7.4 have been shown for cycling training programmes in the UK (SQW, May 2007).

We will provide appropriate levels of, and timely, funding towards implementing the NCPF.

Instruments - Legislation and Enforcement (Chapter 5)

We will review Irish road traffic legislation to improve cyclist safety. We will improve enforcement of traffic laws to enhance cyclist safety and respect for cyclists. We will pay special attention to speeding in urban areas.

Instruments - People (Chapter 6)

We will develop the structures that are required to coordinate the implementation of the NCPF across the many government departments (central and local) and agencies with a role. We will provide design professionals with suitable training and guidance to develop and implement the policies of the NCPF. We will support the deepening of knowledge of the subject of cycling planning in all relevant bodies ranging from universities to professional institutes.

Evaluation and Effects (Chapter 7)

We will develop a monitoring framework and set of indicators to assess progress in implementing the NCPF. We will focus on measuring cycling numbers in urban and rural areas, and cycling accidents. We will use hospital records of cycle accidents to supplement Garda records. We will evaluate the success of the implementation of the NCPF on a regular basis.

Objectives In This NCPF

The objectives developed in this policy document total 19. They cover; Infrastructure (Chapter 2), Communication/Education (Chapter 3), Financial Resources (Chapter 4), Legislation and Enforcement (Chapter 5), Human Resources and Coordination (Chapter 6) and Evaluation and Effects (Chapter 7). They are listed as follows:

Objective 1: Support the planning, development and design of towns and cities in a cycling and pedestrian friendly way.

Objective 2: Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly and that traffic management measures are also cyclist friendly.

Objective 3: Provide designated rural cycle networks especially for visitors and recreational cycling.

Objective 4: Provide cycling-friendly routes to all schools, adequate cycling parking facilities within schools, and cycling training to all school pupils.

Objective 5: Ensure that all of the surfaces used by cyclists are maintained to a high standard and are well lit.

Objective 6: Ensure that all cycling networks - both urban and rural - are signposted to an agreed standard.

Objective 7: Provide secure parking for bikes.

Objective 8: Ensure proper integration between cycling and public transport.

Objective 9: Provide public bikes in cities.

Objective 10: Improve the image of cycling and promote cycling using “soft interventions” such as promotional campaigns, events etc.

Objective 11: Improve cyclists’ cycling standards and behaviour on the roads.

Objective 12: Improve driver education and driving standards so that there is a greater appreciation for the safety needs of cyclists.



Objective 13: Support the provision of fiscal incentives to cycle.

Objective 14: Provide appropriate levels of, and timely, financial resources towards implementing the NCPF.

Objective 15: Introduce changes to legislation to improve cyclist safety.

Objective 16: Improve enforcement of traffic laws to enhance cyclist safety and respect for cyclists.

Objective 17: Develop a structure that can co-ordinate the implementation of activities across the many Government Departments, Agencies and NGO's.

Objective 18: Provide design professionals with suitable training / guidance to develop and implement the policies of the NCPF. Support the deepening of knowledge of the subject of planning for cyclists in Ireland.

Objective 19: Evaluate the cycling policy and monitor the success as the measures are implemented.

01

Introduction

1.1 Background / Context:

The Government is committed to developing cycling as one of the most desirable modes of travel, it being good for your health, the economy and the environment. This National Cycle Policy Framework (NCPF) sets out objectives to the year 2020 to achieve its vision.

1.2 The Vision

We have examined best practice in some of the most cycling friendly cultures, and have considered the views of many of the stakeholders at home. We have identified the potential to grow cycling as a share of overall commuting and have examined the mistakes made in the past by other countries. We have identified the measures that are required to make Irish towns and villages safe and attractive for cyclists of all ages and abilities. Based upon our analysis, we have developed the following vision for 2020.

Our vision is to create a strong cycling culture in Ireland...

Our vision is that all cities, towns, villages and rural areas will be bicycle friendly. Cycling will be a normal way to get about, especially for short trips. Next to walking, cycling will be the most popular means of getting to school, both for primary and secondary school. Our universities and colleges will be bustling with bicycles. Business men and women will see the bicycle as the best way to travel for part or all of their daily commute. Shopping by bike will be as normal as it is in many of the Northern European cycling friendly countries. The bicycle will be the transport mode of choice for all ages. We will have a healthier and happier population with consequent benefits on the health service. We will all gain economically as cycling helps in easing congestion and providing us with a fitter and more alert work force.

A culture of cycling will have developed in Ireland to the extent that by 2020, 10% of all trips will be by bike.

1.3 Why Encourage Cycling?

An Improved Quality of Life

The quality of everybody's lives will improve as more of us cycle more often. We will get the regular exercise that helps keep our heart, lungs and muscles in good working order. We will live longer and be happier as our mental well-being is enhanced with regular exercise. We will have stronger communities as there will be regular interaction between those out walking and cycling in our neighbourhoods and town centres. Our streets will become more sociable, convivial and vibrant as more of our population use the quiet, non-polluting and non-threatening means of transport. Those countries which have the highest use of the bicycle have the lowest rates of cycle accidents. In these countries there is a wide variety in the ages of cyclists - i.e. the young and the old cycle daily. Many drivers also cycle.

Younger people have greater independence when they can take more of their trips by bicycle. It gives them increased confidence as they can travel to and from school on their own or with their friends, while it frees parents from the need to chauffeur their children to school. When these younger people begin to drive,



they have a strong understanding of how to drive safely on the public roads and how to interact with cyclists.

A stronger Economy

Cyclists are almost completely immune to urban congestion. They also ease congestion as they use valuable road space very efficiently. The door-to-door journey times for trips by bicycle are predictable to within a few minutes. It is the quickest mode of transport in an urban environment for trips up to 5-6km (European Commission, 1999), and for longer trips at peak hours. A cyclist is free from public transport timetables and can park his or her bicycle very easily and very close to the destination. No time is wasted looking for parking spaces. The bicycle can increase the catchment area served by a public transport service around 9 fold (based on the rationale that cycling speed is approximately three times that of walking speed). Therefore, the investments in public transport supported by cycling promotion measures can bring combined benefits. In The Netherlands 33% of all train trips begin by bike (Ministerie van Verkeer en Waterstaat, the Netherlands, 2007).

The modern approach to mobility is about giving people more options. One is not just looking at persuading more people to use bicycle for all of their trips or for the full length of their trips; one is looking at using bicycles for (at least part of) some of the trips.



Further economic benefits arise from the lower external costs of providing for cyclists compared to those associated with a more car dependant society – e.g. car accidents, policing the road network, road maintenance etc. There are also reduced public health costs when a higher proportion of the population cycle. Furthermore, cycling employees are healthier with less absenteeism and are more alert than their non-cycling colleagues (Cycling England, 2007). At an individual level, one has greater disposable income to spend on other goods & services.

The business environment in towns and cities improves when there are more cyclists in the traffic mix: there is an increased perception of security in a city where there is the ‘passive policing’ of streets by cyclists (as with increased pedestrian numbers) as against one in which cars dominate the streets (European Commission, 1999). There is also an increased use of local services / decreased leakage from local economies when people cycle to local shops etc.

Cycling tourism is an important activity as it brings money directly into rural Ireland. This is especially important in the context of the current trend in which visitors are taking shorter breaks mainly to cities (Fáilte Ireland, 2007). Finally cycling gives adults increased access to labour markets compared to when the labour force uses (walking and) public transport only.

An Enhanced Environment

It takes very little energy and resources to construct bicycles and the bare minimum to use them. In a world where fossil fuels are increasingly expensive and insecure, it makes sense for us to use the bicycle for shorter trips. This will result in a significant reduction in CO₂ emissions.

If a car trip is replaced by a bicycle trip, then one saves, on average, approximately 150 grams per kilometre. When one replaces 2000 km of car trips by bicycle trips, then one saves 300 kg of CO₂.

At a local level, the quality of air in our cities would improve if more people cycled.

1.4 Why Is A National Cycle Policy Framework Being Developed?

There is currently no NCPF in Ireland. International experience indicates (ECMT, 2004) that having a national cycling policy can be a powerful tool to encourage cycling in urban areas and rural recreation. Such a framework can provide a common, integrated basis for the long term development and implementation of cycling policies among various sectors and levels of government. It can:

- articulate common objectives, goals, and a set of specific, integrated, co-ordinated actions among the different departments and agencies (horizontally), as well as among national, regional and local authorities (vertically), and in partnership with industry, cycling associations and other stakeholders;
- demonstrate political will and commitment at the national level, thereby pushing cycling policies higher on the policy agenda;
- raise awareness and “demarginalise” cycling as a sustainable mode of transport;
- provide a basis for the monitoring and evaluation of cycling policy implementation by national, regional and local authorities.

Furthermore, in the Irish context particularly, the NCPF:

- is part of the contribution to a sustainable travel vision,
- is part of a process of cultural development;
- is a tool to help leverage funding for schemes;
- can help set standards and develop quality criteria.

1.5 The Decline In Cycling In Ireland

Commuting cycling has been in marked decline since the 1980s both for adults as well as children. In 1986 a total of 23,635 primary level pupils cycled to school whereas in 2006, only 4,087 primary school pupils cycled to school (a decline of 83%). Of these only 1,044 were girls (25.5% of total). Census 2006 report on mode of travel (Question #17) revealed that only around 1.9% of adults used a bike to go to work.

If one is to reverse the trend, strong interventions are required.

1.6 Criteria For Making NCPF Successful

Successful cycling policies must integrate with wider transportation and other policy fields (such as planning, road safety, public health etc.)

The most important factors in ensuring that a national cycling policy is successful are as follows (Pettinga, A., 2006) and (Crass, M., 2005):

- the participation of many stakeholders across several government departments, many agencies, all local authorities and other non-governmental organisations and institutions;
- funding for the initiatives;
- the knowledge and human resources available to implement the policies;
- legislation and Enforcement.





02

Interventions – Infrastructure & The Physical Environment

The objectives presented in this chapter cover the interventions relating to our physical environment that need to be made in order to encourage cycling. The objectives are presented moving, broadly, from the largest scale (urban / regional planning) to a detailed level (provision of cycling parking etc.) and are not necessarily related to their priority. In promoting cycling, we need to have cycling-friendly urban planning and cycling-friendly road design / traffic management measures and integration with public transport and plentiful cycling parking and the other measures described in this document. It is a very broad package of measures that is required, not just single, specific interventions.

Objective 1

Support the planning, development and design of towns and cities in a cycling and pedestrian friendly way.

Discussion

The current development of towns and cities often takes place in a way that results in long distances between the trip origin and destination, such as between the home and school. While the distance “as the crow flies” may be quite short, the route that walkers, cyclists and public transport users take can involve long detours. What is required is more compact, mixed-use developments which are permeable and well connected to existing developments for cyclists (and pedestrians). This ensures more direct routes for the more sustainable modes. What is also required is high quality civic spaces that are not dominated by moving or parked motorised vehicles.

The reasons why many developments / town centres and extensions do not have these characteristics are manifold but include the absence of an approach of integrating land-use and transportation for most towns / developments. There is still an over-emphasis on designing for the motorised vehicle rather than the more sustainable modes. Policies to respond to this must address both existing and future developments.

It should be noted that the term cycling-friendly is used throughout this report. This has a broader meaning than just safe for cycling. It also encompasses the quality criteria of coherence of route, directness, comfort and attractiveness. These criteria also apply to walking.

No.	Policy	Implemented by
1.1	Planning Guidelines We will ensure that all planning guidelines and strategies support cycling promotion as a stated objective. This will be at the levels of National Spatial Strategy, Regional Planning Guidelines, Development Plans and Local Area Plans.	DoEHLG + LA's
1.2	Additional Planning Guidelines and Instruments We will examine the success of additional planning guidelines and instruments such as the (non-statutory) Integrated Framework Plans for Land Use and Transportation (IFPLUTS), (statutory) Strategic Development Zones (STZ's) and masterplanning as devices to facilitate producing cycling friendly (urban) planning. On the basis of this examination, we will ensure that the most successful tool is used more extensively so as to ensure that future developments are planned in a cycling-friendly way.	DoT + DoEHLG + LA's
1.3	Policies concerning the locating of retail, commercial, schools and colleges. We will ensure that development plans favour the locating of retail outlets (and other important destinations) in areas that are serviceable by non-motorised modes.	DoEHLG + LA's



No.	Policy	Implemented by
1.4	Urban Design	DoEHLG
	<p>We will produce design guidance similar to the UK “Manual for Streets” (MfS) to assist planners, transportation consultants, architects and other design professionals in “the art of making places for people”. We recognise that national guidance documents should firmly situate the design of roads and streets within urban design. The MfS document emphasises the role of streets as social spaces, where people come first. The new Irish guidance that is required will cover not only the design of residential streets but town/city centres and mixed use areas.</p>	
1.5	Cycling Demonstration Towns	DoT
	<p>We will develop “Cycling Demonstration Towns” showing best practice in cycling- friendly urban planning, urban design and traffic engineering. This will include the retrofitting of existing impermeable / poorly connected developments. Such schemes will take place following studies of the experiences of UK Cycling Demonstration towns and other European Cycling Cities (such as Odense, Denmark). The CDT’s developed can showcase all interventions positive for cycling, not just those at a “high level” (i.e. planning level).</p>	

No.	Policy	Implemented by
1.6	<p>Existing Development Layouts</p> <p>We will develop a national programme of remedial works to enhance the layout of housing estates with a focus on creating a network of attractive back-street routes closed to motor traffic but available for use by child cyclists and less confident adult cyclists.</p>	DoEHLG + L.A.'s
1.7	<p>Development Plans, Local Area Plans and National Cycle Policy Framework</p> <p>We will ensure that that all Development Plans are reviewed by DoEHLG so as to ensure that they are consistent with the objectives and policies of the NCPF. We will ensure that the development plans contain objectives to produce local cycling policies. The content of the policies should be informed by best international practice.</p> <p>Such cycling policies would form part of Local Transport Plans (see 2.2)</p> <p>We will produce specific guidance for Local Authorities for inclusion in Development Plans on effective means of enabling direct cycle routes / accessibility through new developments and enabling connectivity to shops, schools and other facilities such as public transport stations/stops.</p>	DoEHLG + DoT
1.8	<p>Planning & Development Act 2000</p> <p>Schedule 1 to the Planning and Development Act 2000 lists the purposes for which objectives may be indicated in the Development Plan. Point 2 refers to the promotion of sustainable settlement and transport strategies in urban and rural areas. We will re-examine this point and, if necessary, to expand it to refer specifically to cycling.</p> <p>Furthermore, we will emphasise cycling in an updated version of the publication "Development Plans, Guidelines for Planning Authorities", DOEHLG June 2007. This will facilitate specific policies in Development Plans.</p>	DoEHLG

Objective 2

Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly and that traffic management measures are also cyclist friendly.

Discussion

The current design of many urban roads is still focused on motor powered vehicles, often at the expense of cyclists and pedestrians. Examples include multi-lane one-way streets, large complex junctions - especially roundabouts, left-only slip-lanes and other free-flow arrangements. Many examples of parts of the urban cycle networks that have been provided to date produce a loss of priority to cyclists at junctions compared to what they would have if they remained on the main carriageway. Such designs reflect a bias towards providing for motor powered vehicles.

A new approach to the design of urban roads in which the car does not dominate is required. There must be a greater focus on the “Hierarchy of Solutions” (as was developed in The Netherlands originally and explained in the 1996 UK Cycling Friendly Infrastructure document). This is summarized as follows here:

(1) Traffic reduction

Can traffic levels be reduced, particularly heavy goods vehicles (HGVs)? Measures could include restricting the movements of HGVs from local roads, building by-passes to divert through-traffic, and environmental road closures to discourage through-traffic.

(2) Traffic calming

Can speed be reduced and driver behaviour modified? Here the emphasis must also be on enforcement (whether through increased use of speed cameras or other technologies). The concept of “traffic calming” should also be broadened to include physical measures to revise the perceived design speeds of roads, and other measures, such as the removal of one-way street systems. Multi-lane one-way street systems require cyclists to take detours rather than direct routes. They can also be daunting for cyclists since, if one intends to take a right hand turn at a junction, then one is required to weave across several lanes of (often fast-moving) traffic.

(3) Junction treatment and traffic management

This includes:

- urban traffic control systems designed to recognise cyclists and give them priority;
- contra-flow cycle lanes on one-way streets / making two-way streets for cyclists;
- exemptions to cyclists from certain banned turns and access restrictions;
- combined bus/cycle priority measures - and building upon the successful examples already developed in Irish cities (and learning from examples of QBC/cycle designs in which the route is not perceived to be cycle-friendly).
- on-street parking restrictions;
- advanced stop lines for cyclists at traffic signals - as has already been done in some cities around the country;
- by-passes for cyclists at traffic signals;
- signalling roundabouts, changing priorities at junctions so as to make cycle friendly;
- advanced transport telematics: designing new systems to benefit cyclists.

(4) Redistribution of the carriageway

Can the carriageway be redistributed? Such as by marking wide kerb lanes or shared bus/cycle lanes?

(5) Cycle lanes and cycle tracks

In addition, having considered and, where possible, implemented all of the above, what cycle tracks or cycle lanes (if any) are necessary in order to make a route cycling-friendly?

(6) Cycleways (public roads for the exclusive use of cyclists and pedestrians)

What opportunities exist to create traffic-free routes linking, for example, residential areas to important destinations? These might include links between (previously unconnected) residential areas using parks, canal and river-side routes, e.g South Dublin County Council plan for cycling in parks.

It can be seen from the above that in making provision for cyclists in the urban environment, it is often less about providing dedicated cycling facilities and more about wider traffic interventions that benefits all of the more vulnerable road users, not just cyclists. Should

any cycle networks be developed they must adhere to the five main requirements for cycling: safety; coherence; directness; comfort; attractiveness. It must be ensured that the design process used to produce schemes incorporates the use of Road Safety Audits, and other quality control measures to ensure the designs are of the highest quality with construction standards to match. Many current designs require cyclists to yield at secondary roads when they are on primary roads, or require “the pedestrianisation of cyclists” in areas of difficulty.

It must be understood that providing cycling networks alone - if narrowly defined to only mean cycle-tracks

and cycle-lanes - is not the solution to persuading more people to cycle. The urban cycle network must consist of a broad variety of measures including: traffic-reduced areas and public squares, train station areas, school areas; cycle-friendly junctions (with, in some cases, cycle bridges and tunnels and cycle traffic lights), traffic-calmed streets; cycle-lanes with visual segregation (painted tracks); physically separated cycle tracks, cycleways; street lighting, road signs etc. i.e. it requires the full tool-box of engineering solutions. The bicycle network in this case is part-and-parcel of the integrated approach to urban traffic solutions. Urban cyclists need them and latent cyclists are waiting for them before choosing to bike.

No.	Policy	Implemented by
2.1	<p>Design Philosophy</p> <p>We will ensure that when designing for cyclists (and other vulnerable road users), the design philosophy followed will be that as encapsulated in the “Hierarchy of Measures” as described above. This design philosophy must inform the development of any Local Transport Plans that are developed. See 2.2.</p>	DoT and LA's
2.2	<p>Local Transport Plans (LTP)</p> <p>We will examine the merits of introducing “Local Transport Plans” (LTP’s) as instruments to ensure that more cycling-friendly policies and strategies are developed at the local level. Should any bicycle policy audits be carried out, these must inform the LTP.</p>	DoT and DoEHLG
2.3	<p>Through Traffic</p> <p>We will support local authorities in removing through-traffic from urban centres and school routes through, amongst other measures, the provision of a national programme of ring-roads and town / village by-passes. As these are built, other measures to make the town centre more bicycle friendly should be introduced: environmental traffic cells, bridge / road closures, removal of spare lanes at signalised junctions, dismantling of one-way street systems, removal / modifications of roundabouts etc.</p>	DoT and LA's
2.4	<p>HGV Strategies</p> <p>We will require local authorities to develop Heavy Goods Vehicle (HGV) Management Strategies for every town in the country. We will consider a ban on the movement of HGVs on routes to schools / other specific routes with mixed traffic between 08.30-09.30 and 15.00-17.00.</p>	DoT and LA's

No.	Policy	Implemented by
2.5	<p>Audits of Existing Infrastructure</p> <p>We will carry out audits of existing urban infrastructure to assess the quality of the cycling routes using an agreed set of criteria. This would include not only existing dedicated cycling facilities but all of the other elements of the roads infrastructure used by cyclists – roundabouts, one-way streets, road narrowings, narrow traffic lanes (in the context of the development of the Quality Bus Network etc).</p>	DoT supporting LA's
2.6	<p>Remedial Measures</p> <p>We will carry out remedial measures on existing cyclist-unfriendly urban roads with a special focus on roundabouts, multi-lane one-way streets and road narrowing schemes. Without addressing the difficulties posed by high capacity, high speed roundabouts in urban locations – and particularly those between residential areas and schools - it will be very difficult to encourage more of the public to cycle.</p>	LA's
2.7	<p>Future Schemes</p> <p>We acknowledge that the designs of many of the roundabouts, one-way street systems and off-road cycle tracks that have been constructed over the last number of years are not cyclist friendly. We will ensure that new design guidance is in place before supporting local authorities in constructing future schemes.</p>	DoT
2.8	<p>Demand Management</p> <p>We will use demand management measures to make cities and town centres relatively more attractive for cyclists (and public transport users). These will be included in Local Transport Plans.</p>	LA's
2.9	<p>Urban Cycle Networks</p> <p>We will develop cycle-networks as part of wider cyclist-friendly local traffic plans / traffic management plans in all urban areas. The use of the concept of “cycle network” will not imply that the routes forming it will only consist of linked cycle-lanes and cycle tracks (as was the original interpretation of much of the network in Dublin). Instead the design philosophy will be based on the “hierarchy of measures” as described above with the focus being on the reduction of vehicular speeds, ensuring that all junctions are cycling friendly etc. We will ensure that designs are created with the principal aim of preserving cyclist momentum. We will also ensure that designs will provide for a safe passing distance of 1.5m between motorised vehicles and bicycles.</p> <p>We will also underline the need for designers to cycle all routes for which they are producing designs.</p>	DoT + LA's



No.	Policy	Implemented by
2.10	Sutton to Sandycove Scheme We will complete the Sutton to Sandycove (S2S) cycleway / promenade. This 22km continuous facility will act as a commuting route as well as a world class recreational and tourist route. It will be a flagship project for the capital.	DoEHLG
2.11	Experiments We will provide support to carrying out “new experiments” in road design, traffic management and use of space in urban areas. For example, we will examine the work of Hans Mondermans in the Netherlands and his experiments of creating shared spaces without the use of traffic signs and lines and traffic lights etc. - now also being carried out in Kensington High Street, London - or the work of David Engwicht from Brisbane and his street party approach to traffic calming. Such experiments would be carried out by multi-disciplinary Local Authority teams.	DoT

Objective 3

Provide designated rural signed cycle networks providing especially for visitors and recreational cycling

Discussion

Ireland currently does not have a National Cycle Network on the ground. However, Fáilte Ireland has produced its Strategy for the Development of Irish Cycle Tourism (Fáilte Ireland, 2007). This strategy identified an approximately 3000km long network running from Donegal along the West, South and South-east coasts and continuing along the East coast as far as the Northern Ireland border. While the main target market of the cycle tourism strategy is visitors – both overseas and domestic – the secondary target market is recreational cyclists. From the perspective of the National Cycle Policy Framework, encouraging recreational cycling is a key element of

creating a cycling culture in Ireland and recreational routes in and around urban areas, which, in turn link to rural areas are very important.

The network identified will mainly use a mix of minor roads, and some greenways. The 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. While the overall framework of the tourism network has been identified, there is more work to be carried out to identify further routes, particularly in the Midlands and particularly to use existing traffic free routes such as the canal and river tow paths. There is also further work to be carried out in identifying which sections of the extensive network of disused rail-lines would be most suitable to be converted to high quality, traffic-free routes suitable for cyclists of all ages and abilities.

No.	Policy	Implemented by
3.1	<p>National Cycle Network (NCN)</p> <p>We will construct the National Cycle Network (NCN) as identified in the 2007 Strategy for the Development of Irish Cycle Tourism. We will ensure that the Regional Authorities will incorporate the appropriate policies into the Regional Planning Guideline so as to facilitate in the implementation of the National Cycling Network.</p>	DoT, NRA, DAS&T, Fáilte Ireland + LA's
3.2	<p>Expansion of NCN</p> <p>We will carry out further research and surveying work in order to expand the network to include rural recreational routes around urban areas and to connect major urban areas. We will pay special attention to the opportunities of using both the extensive disused rail network and canal / river tow-path networks as cycling / walking routes. In expanding the network, we will examine the recent UK experiences of the construction of their networks.</p>	DoT and LA's
3.3	<p>Hard Shoulders and Contiguous Areas</p> <p>We will examine the idea of using the hard shoulders and the contiguous space of roads with an arterial character as part of the National Cycle Network. We will ensure that those hard shoulders have the same maintenance and drainage standards applied to them as to the rest of the carriageway.</p>	DoT and NRA
3.4	<p>Upgrading of National Roads</p> <p>In regard to the upgrading of national roads, we will ensure that any such proposals do not impact negatively on the safety and perceived safety of the roads for cyclists.</p>	DoT and NRA



Objective 4

Provide Cycling-Friendly Routes To All Schools, Provide Adequate Cycling Parking Facilities Within Schools And Colleges, And Provide Cycling Training To All School Pupils.

Discussion

The proportion of trips taken to school by bike has dropped dramatically over recent years. In recreating a cycling culture in Ireland, there must be a special focus on making the trip to school and college safe

and attractive for cyclists. This objective will tie in closely with public health objectives relating to reducing the incidence of obesity.

The provision of a safe infrastructure to schools is covered in objectives 1 and 2 above and, to a lesser extent, objective 3. The school grounds themselves should be cycling-friendly environments with well-located, safe and sheltered bicycle parking facilities at each school. Cycling education and training should be part of the school curriculum at both primary and secondary levels. (See also Objective 11)

No.	Policy	Implemented by
4.1	<p>Safe Cycling Routes</p> <p>We will provide safe cycling routes to all primary and secondary schools and third level colleges by 2020. An audit will be carried out of every school / routes leading to the school from residential areas.</p>	DoT and LA's
4.2	<p>Low Speed School Environs</p> <p>We will ensure that by 2020 the environment in the immediate vicinity of schools is a safe and attractive low speed (30kph) environment with speed limits strictly enforced, and drop-off by car within a given distance restricted.</p>	DoT and LA's

No.	Policy	Implemented by
4.3	<p>Green Schools Programme</p> <p>We will expand the Green Schools Programme to all schools in the State by 2020. We will encourage all Boards of Management of Schools to develop school travel plans that maximize the use of the bike, walking and public transport. Such plans would also include consideration for the phased opening times of schools, and a relaxation of the obligation for female school students to wear skirts.</p>	DoT + DoES
4.4	<p>Cycling Training</p> <p>We will monitor the success of the cycling training programmes already provided by some local authorities (such as Dublin City Council) and, if appropriate, expand these to all schools by 2020. (See also Objective 11.1)</p>	DoT + DoES

Objective 5

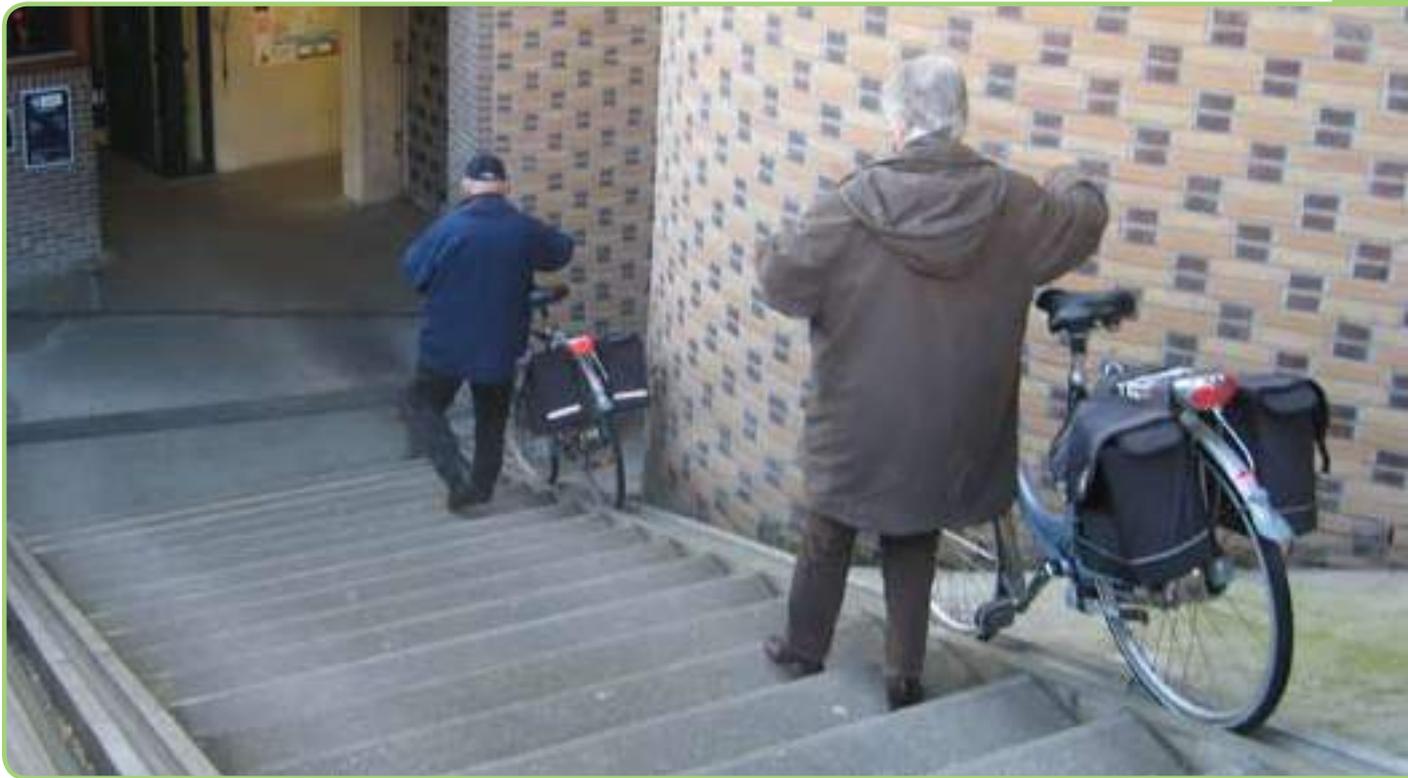
Ensure that all of the surfaces used by cyclists are maintained to a high standard and are well lit.

Discussion

Cyclists are more susceptible to being destabilised by poor road surfaces than other road users. Cyclists are simultaneously steering, balancing themselves and propelling the bike. The issue of general roads maintenance – from simple and regular sweeping

to prompt detection and remediation of potholes – is of primary importance. Indicators must be developed that roads authorities must use to assess the quality of the roads in their areas. Care must be taken to ensure that drainage is adequate and that drainage grates and gulleys are of a placing and type that does not endanger or discommode cyclists. Special attention needs to be paid to the additional maintenance needs of any segregated cycling facilities that may be created given that they are not swept by the movement of other vehicles.

No.	Policy	Implemented by
5.1	<p>Indicators</p> <p>We will ensure that the indicators / standards for the quality of road surfaces, take into account the needs of cyclists.</p>	DoT
5.2	<p>Maintenance to Standards</p> <p>We will ensure that all road surfaces are maintained to the standards developed in 5.1 above.</p>	DoT
5.3	<p>Reinstatement by Contractors</p> <p>We will work with Local Authorities to assess the current consequences for contractors who do not reinstate the roads to an agreed standard. We will increase penalties, where necessary.</p>	DoT



No.	Policy	Implemented by
5.4	Off-road Cycle Track Maintenance We will encourage use by local authorities of special equipment to maintain / sweep off-road cycle tracks / cycleways. This could include the purchase of vehicles with in-built GPS systems which note the exact location of potholes etc. and which automatically relay this information back to the roads authority maintenance section (such as the system used in Odense, Denmark).	DoT and LA's
5.5	Pothole Hotlines We will provide support for introduction of “emergency hotlines” in all LA's to enable the (cycling) public to report potholes / inadequate reinstatement of roads, broken glass on the road etc.	DoT and LA's
5.6	Lighting of Cycleways We will ensure that any dedicated cycling routes which are developed which are away from the main public carriageway are well lit where appropriate.	DoT's + LA's



Objective 6

Ensure that all cycling networks - both urban and rural - are signposted to an agreed standard

Discussion

There is inadequate signposting of cycling friendly routes and those routes forming parts of the cycling network (Fáilte Ireland, 2007). This is of particular relevance for those routes used by recreational and visitor cyclists.

No.	Policy	Implemented by
6.1	<p>Signposts</p> <p>We will ensure that as the urban and rural cycle networks develop, sign-posting is provided to the standards developed as part of the Strategy for the Development of Irish Cycle Tourism. The signs will include directional signs, warning signs as well as interpretation panels for routes.</p>	<p>DoT + LA's + DAS&T, Fáilte Ireland</p>
6.2	<p>Cycling Maps</p> <p>We will support the production of cycling maps both for rural and urban contexts. Such maps can also include useful information such as details of local bicycle shops, guarded bicycle parking facilities (as they are provided) etc.</p>	<p>DoT + LA's</p>

Objective 7

Provide secure parking for bikes

Discussion

The provision of well-located, plentiful, sheltered and secure parking facilities is as important to the cyclist as the provisions for moving cyclists described above. In recreating a cycling culture, it must be easy for cyclists to park their bikes as close as possible to their destination. The provision of cycling parking is also needed to tackle bicycle theft. At best, bicycle theft and vandalism deters users from buying quality bikes resulting in cyclists not benefiting from using faster, lighter, more comfortable and safer bicycles; at worst, they deter the public from buying bikes at all. Therefore it is important to understand how strategies from abroad have succeeded in tackling bicycle theft and how these may be adaptable to an Irish cultural context.



No.	Policy	Implemented by
7.1	National Guidance on Cycle Parking We will develop national guidance on cycling parking provision. This will include details of the best types of facilities for different locations depending on security, space and cost requirements. It will also include guidance to all Local Authorities indicating what are suitable levels of cycling parking for different types of developments. This guidance must be incorporated into the revision of their next Development Plans.	DoT + DoEHLG
7.2	Compliance with Planning Conditions on Cycle Parking We will ensure that Local Authorities check that developers comply with planning permission conditions regarding the provision of cycling parking facilities.	DoEHLG + LA's
7.3	Existing Developments We will encourage employers to provide cycling parking facilities at existing developments.	DoT + LA's
7.4	Guarded Bicycle Parks We will create strategically located high-capacity guarded bicycle parking facilities in city centre locations so that commuters can leave bikes safely in the city. These could, potentially, be located on the ground floor of city centre multi-story car parks, some of which are located in the centre of environmental traffic cells.	DoT + LA's

No.	Policy	Implemented by
7.5	<p>Bicycle Stations</p> <p>We will examine schemes whereby customers could pay a modest fee to have their bikes kept safe and dry, and a parking attendant could park and fetch bikes (similar to leaving coats in a cloakroom). Ideally these buildings could evolve into bicycle stations with showers, lockers, changing rooms, and could sell basic equipment like lights, bells, reflective materials, bicycle baskets and pannier bags as well as cycling maps etc. See also objective 9 below. The best known example is Munster, Germany.</p> <p>We will also consider a scheme where customers could also pay for the use of these facilities by an annual subscription which could, in turn, be subject to tax credits. The scheme could start in major urban areas and develop to include all towns and major shopping centres.</p>	DoT + LA's
7.6	<p>Mobile Cycle Parking Facilities</p> <p>We will ensure that local authorities provide mobile guarded bicycle parking facilities to let for special events, e.g. football matches, open-air festivals, village fairs etc. (See example from World Cup final in Berlin in 2006 in which mobile bicycle parking facilities were used.) - Proceedings from Velo-city, Munich 2007.</p>	LA's
7.7	<p>Tackling Bicycle Theft and Vandalism</p> <p>We will develop a national strategy to tackle bicycle theft in collaboration with stakeholders. This is likely to include cycling organizations, Local Authorities, An Garda Síochána, bicycle shops, lock manufacturers, insurance companies, producers of parking equipment etc. Such a strategy is likely to include recommendations on the need to develop a national register / database of bikes, publications aimed at cyclists advising them on how to / where to lock bikes, specific policies dealing with abandoned bicycles etc.</p>	DoT and other Stakeholders

Objective 8

Ensure Proper Integration Between Cycling And Public Transport (PT)

Discussion

The reach of public transport is limited when PT users are limited to walking to the PT stop or station. There is considerable scope for increasing the catchment area serviced by a particular PT corridor when bikes are combined with PT. As per objective 7 above,

there needs to be high quality cycling parking at all PT stops and stations. It is noted that of all train travellers in the Netherlands, 33% use the bicycle to get between home and the station. (Ministerie van verkeer en Waterstaat, 2007). There also needs to be improved provision for the carriage of bikes on public transport vehicles. The main market here is not daily commuters who will generally leave their bikes at one (or both) end(s) of the PT trip but those recreational / tourist users who want to bring their own bikes to the scenic destination.

No.	Policy	Implemented by
8.1	<p>Safe Routes to Stations</p> <p>We will require Local Authorities to provide safe and attractive cycling routes to PT stations / stops in collaboration with the PT operator. This might include, for example, the creation of a new entrance or route across lands owned by the PT agency / provider.</p>	DoT with CIÉ, RPA and LA's
8.2	<p>Cycling Parking at all PT Stations</p> <p>We will audit every intercity, sub-urban rail, (future Metro), DART, LUAS and bus station to assess existing and potential cycling parking provision and will support the construction of suitable cycling parking facilities at each station. This will include cycle parking stations that may be guarded with staff, CCTV, swipe cards etc. and will be based upon best international practice.</p> <p>We will ensure that at the planning design stage of all future PT projects, there is proper provision made for quality cycle parking facilities.</p> <p>The cycling parking design guidance produced at 7.1 above will include all the necessary technical advice on the design of such facilities at train stations.</p>	DoT with CIÉ, RPA and LA's
8.3	<p>Bicycle Stations</p> <p>We will provide, as a pilot project to begin with, bicycle stations at rail station(s) or major public transport hubs.</p> <p>Bicycle stations are guarded indoor bicycle parks with a capacity of from several hundreds up to several thousands. Mainly targeted at commuters with season tickets, they offer long opening times (before the arrival of the first train until after the last train), sales of new and second hand bikes, accessory sales, same day repair service and bike rental. Cf. Example in Munster, Germany.</p>	DoT + Iarnród Éireann
8.4	<p>Bicycles and Intercity Rail</p> <p>We will ensure that intercity trains have proper provision for the carriage of cycles over and above the currently proposed "maximum of 2 bikes per train". This may require the retrofitting of rolling stock with flip-up seats. We will ensure that the specification of all rolling stock not yet ordered provides for the carriage of bikes.</p>	DoT + Iarnród Éireann
8.5	<p>Bicycles and Sub-Urban Rail</p> <p>We will permit the carriage of bikes on DART and other suburban rail services at off-peak times and on counter peak services at peak hour, following a more detailed study which will recommend suitable devices / facilities for the proper restraining of bikes on the trains. This will include all future Metro plans in Dublin (or anywhere else they may be planned).</p>	DoT + Iarnród Éireann + RPA

No.	Policy	Implemented by
8.6	<p>Bicycles and LUAS</p> <p>We will provide for the carriage of bikes on LUAS when services are of a frequency and at a capacity that allows for it. i.e. when it is considered possible to carry bikes on carriages when they do not interfere with the capacity for pedestrians.</p>	DoT + RPA
8.7	<p>Bicycles and Intercity Buses</p> <p>We will examine the existing conditions of carriage of bikes on intercity buses – both public and private – and develop specific policies to improve the service. This will include having operators provide clear information on the conditions of carriage of bikes.</p>	DoT, Bus Éireann + private operators
8.8	<p>Bicycles on Urban Bus Services</p> <p>We will support the development of a pilot project for the carriage of bikes on urban bus services comparable to what is currently used on buses in Canada and US</p>	DoT and Dublin Bus
8.9	<p>Bikes and Ferries / Ports</p> <p>We will carry out a study examining a range of issues under this heading. This could include:</p> <ul style="list-style-type: none"> (i) Availability of / need for safe and well sign-posted routes to and from ports (both for employees in ports / cycling tourists); (ii) Facilities at ports (cycle parking etc.); (iii) Availability of / need for clear information on what ferry companies at each port take bikes, costs, conditions of carriage etc. Information to be available on-line and at port. (iv) Availability of / need for cycling maps etc. at ports showing visitors how to get to city centres / other local centres. (v) Encouraging ferry companies to facilitate the carriage of bikes 	DoT and LA's and Port Companies
8.10	<p>Bikes and Planes / Airports</p> <p>We will carry out a study examining a range of issues under this heading. This could include:</p> <ul style="list-style-type: none"> (i) Availability of / need for safe and well sign-posted routes to and from airports (both for employees in airports / cycling tourists); (ii) Facilities at airports (cycle parking, areas for dismantling bikes, bike boxes etc.); (iii) Availability of / need for clear information on what airlines at each airport take bikes, costs, conditions of carriage etc. Information to be available on-line and at airport; (iv) Availability of / need for cycling maps etc. at airports showing visitors how to get to city centres / other local centres. 	DoT and Airport Authorities



Objective 9

Provide Public Bikes In Cities

Discussion

Public bikes are now being seen as another element of the public transport system. There are successful schemes up and running in many European cities. The main market here is “incidental trips” – i.e. not the daily commuting trips or recreational / tourist cycle trips. It has been shown to be important in cities in which bicycle culture is (re-) emerging such as in Paris, Barcelona and Lyon.

No.	Policy	Implemented by
9.1	<p>Provide Public Bikes in Cities</p> <p>We will provide municipally-run “public bike” facilities in all cities above 100,000 population such as the O-ve bike scheme in the Netherlands. We will examine and closely monitor the Public Bike System that is due to be launched in Dublin in 2009, as well as studying the systems from abroad before developing Irish versions.</p>	DoT + LA's

03

Interventions – Communication & Education

Objective 10

Improve the image of cycling and promote cycling using “soft interventions”

Discussion

Cycling currently has an image problem. If it is to be treated as a serious mode of transport, it needs to be seen to be normal to be on a bike. Its poor image may be related to it being perceived by many as being unsafe or it may be related to the absence of role models. National campaigns are needed to improve

the image of cycling aimed at - decision-makers, media, planners, developers, businesses, elected members, etc. These should include advertising and marketing campaigns using all available media, for example TV, radio, bus shelter posters, billboards, together with events such as bike week or bicycle festivals. The frequently humorous TV ads shown in the Netherlands celebrating cycling might be taken as a model. There must be a clear message that cycling is a readily accessible form of transport, not requiring unnecessary encumbrances such as specialised cycling attire.

No.	Policy	Implemented by
10.1	<p>Campaigns to change the image of cycling</p> <p>We will examine best international practice in devising campaigns specifically to change the image of cycling. Since there are much fewer women than men cycling (especially during the teenage years) campaigns need to focus on this target group. We will develop a range of national and local campaigns aimed at countering the poor image of cycling. These will be carried out in collaboration with other partners etc.</p> <p>We will develop a range of national and local promotional campaigns selling the wider benefits of cycling: freedom, the fastest way of getting around, sociability of cycling, lack of running costs, health benefits, ecological benefits. A national campaign could, perhaps, be fronted by a well-known public figure.</p>	DoT and DH&C
10.2	<p>Bike Week</p> <p>We will organise an annual National Bike Week. There may also be the possibilities of incorporating the Bike Week into the existing “Sustainable Energy Week” promoted by Sustainable Energy Ireland or “Mobility Week” promoted by European Commission. There is also an embryonic “Bike Week” being developed by the Mater and Temple Street hospitals.</p> <p>The Bike Week could also encompass Bicycle Festivals, as have been organized on a voluntary basis in Dublin or more professionally abroad - e.g. The Cornwall Festival of Cycling, Bicycle Film Festival (which travelled around the world: San Francisco, London, Edinburgh etc.) plus a similar bicycle film festival in Tillburg, Netherlands.</p>	DoT and LA's
10.3	<p>Competitions</p> <p>We will organise competitions to raise awareness of the importance of cycling in special target groups – e.g. the most cyclist-friendly employer / school / college / PT station etc.</p>	DoT
10.4	<p>Information</p> <p>We will produce useful information for cyclists / potential cyclists. This could include:</p> <ul style="list-style-type: none"> • cycling maps; • online journey planners for the different cities; • online weather information (linking it with Met sites for example) • “How not to get your bicycle stolen” information leaflet; <p>We will investigate the idea of creating and running a “Cycling Portal”. This could be a one-stop-shop for anyone seeking information on cycling. Possible content could include news (about events, new legislation etc.), advice, bicycle registration, discussion boards, facility to enable cyclists to report potholes etc. to relevant Local Authority, classified section.</p>	DoT

No.	Policy	Implemented by
10.5	<p>Targeting Employers and Employees</p> <p>We will support companies / other organisations above a certain threshold to produce mobility management plans. Guidance will have detailed reference to the range of interventions that can be used to promote cycling.</p> <p>This could build on the lessons learnt from the “One Small Step” campaign.</p>	DoT
10.6	<p>Targeting Third Level Students</p> <p>We will develop special campaigns / initiatives aimed at the target group of third level students.</p>	DoT / DoES + LA's
10.7	<p>Targeting Shoppers</p> <p>We will develop special campaigns / initiatives aimed at the target group of shoppers.</p>	DoT / DoEHLG + LA's
10.8	<p>Targeting Family / Recreational Cyclists</p> <p>We will develop special targeted campaigns/initiatives aimed at the target group of family / recreational cyclists.</p>	DoT / Fáilte Ireland / LA's
10.9	<p>Targeting Visitors</p> <p>We will support Fáilte Ireland in developing and implementing its Strategy for the Development of Irish Cycle Tourism (See also Objective 3)</p>	DoT / Fáilte Ireland / LA's
10.10	<p>Sports Cycling</p> <p>We will support the development of all aspects of sports cycling. This would include:</p> <ul style="list-style-type: none"> • Road cycling – leisure and racing; • Mountain-biking – leisure and racing; • Track racing; • Bicycle Polo; • Other aspects of the sport. <p>We will work closely with Cycling Ireland (CI) in the development of specific strategies.</p>	DAS & T and Sports Council

Objective 11

Improve cyclists' cycling standards and behaviour on the roads

Discussion

Very few cyclists currently receive formal training. The standards of cycling and standards of adhering to the rules of the road need to be improved. The current poor behaviour of some cyclists impacts on the wider image of cycling. Teaching students how to be safe on a bike teaches them road safety for driving motor powered vehicles later in life. The purpose of the

education proposals is to arrive at a situation where Ireland has a population of cyclists and motorists who have a level of training that would be considered normal in the Netherlands or Germany.

There needs to be a mandatory national cycling proficiency programme for all school children in Irish schools starting at primary level and continuing in a graduated manner through to secondary level. This programme should prioritise practical on-road skills. A similar approved national curriculum for adult cyclists could also be developed, based for example, on the UK "Bikeability" programme.

No.	Policy	Implemented by
11.1	National Cycling Training Programmes for School Pupils We will assess the experiences of those Irish Local Authorities that have run cycling training programmes and we will also examine the National Curriculum of the leading European countries in this area. This will inform and lead to the development of a national curriculum on cycling training for primary schools. Such a curriculum is likely to include desk-based (theory), school-yard based and graded road-based cycling training. (This would include cycling along quieter residential streets and busier roads in mixed traffic). This should emphasize issues such as correct road positioning for cyclists, an awareness of the blind spots on HGVs, etc. It should also include basic bicycle maintenance. We will ensure that every child will receive cycling training using this new curriculum.	DoT / DoES, RSA
11.2	Training Instructors We will develop a curriculum for the training of cycling instructors and train the number of instructors that are required to oversee the curriculum.	DoT + RSA
11.3	Adult Cycling Training We will develop and organise a service to provide cycling training for adults returning to cycling and those who never cycled before.	DoT + RSA
11.4	Awareness Campaigns We will organise campaigns on: (i) promoting greater courtesy by cyclists towards other road users; (ii) wearing of lights, reflective gear etc. on bikes.	RSA

Objective 12

Improve driver education and driving standards so that there is a greater appreciation for the safety needs of cyclists

Discussion

In comparison with (Northern) continental European countries, cyclists in Ireland are not treated with the same respect by drivers. One possible response

to this is that the granting of learner driver permits should be made contingent on the applicant being in possession of a valid Irish schools cycling proficiency certificate or, for adult applicants, evidence of attendance at and passing of an equivalent course of instruction. German learner drivers, in addition to having had cycling training in school must also undertake a formal 90 minute module on vulnerable road users as part of their driver training. A similar requirement could be introduced for Irish learner drivers.

No.	Policy	Implemented by
12.1	Rules of the Road (ROTR) We will ensure that in the next revising of the ROTR, there will be a significant module of how to interact with cyclists - focusing on, for example, passing out cyclists and leaving adequate space, plus interactions between modes at junctions.	DoT / RSA
12.2	General Driver Instruction We will ensure that the curriculum developed for driving instructors/ students includes a greater emphasis on how to interact safely with cyclists. It will include promoting a greater awareness of not encroaching into cycle lanes and cycle boxes (advanced stop lines) etc.	DoT / RSA
12.3	Buses We will pay special attention to the training needs of bus drivers since bicycles and buses both occupy bus lanes and interact closely with one another in this space. We will examine the training curriculum and course followed by bus drivers and ensure that it caters properly in helping trainee drivers understand how best to safely interact with cyclists. We will examine best international practice in the provision of training for bus drivers.	DoT / RSA, Bus Éireann, Dublin Bus and private operators
12.4	Heavy Goods Vehicles (HGVs) We will review the training curriculum for driving heavy goods vehicles given the disproportionately high number of heavy goods vehicles involved in cyclist (and pedestrian) accidents.	DoT / RSA
12.5	Cyclops Mirrors on HGVs We will investigate the feasibility of providing incentives to encourage the retrofitting of Cyclops mirrors to the older vehicle fleet within a specified time period. This may be explored through the Insurance Industry Federation.	DoT

No.	Policy	Implemented by
12.6	Awareness Campaigns We will develop campaigns for all drivers - for example: (i) to explain why it is important to tackle urban speeding - e.g. If you speed, you are making it difficult for others to choose to cycle or walk thus exacerbating congestion; (ii) to promote greater courtesy by motorists towards cyclists; (iii) advising motorists of the legal requirement to yield to cyclists at roundabouts and at other locations;	RSA

Objective 13

Provide fiscal incentives to cycle

Discussion

While cycling is still cheap compared to using other modes of transport, there is an absence of dedicated fiscal policies to incentivise cycling over other modes. There is an opportunity here to use policy interventions tried with great success in other countries in Ireland.



No.	Policy	Implemented by
13.1	Subsidised Bike Purchase We welcome the Budget 2009 initiative under which, from 1 January 2009, the provision of bicycles and associated safety equipment by employers to employees who agree to use the bicycles to cycle to work will be treated as a tax exempt benefit-in-kind. We will encourage employers to implement the scheme through salary sacrifice arrangements as is envisaged in the Budget 2009 provision and review progress to maximise take-up.	DoT
13.2	Cycle Mileage Allowances We will examine the existing scheme that allows for mileage allowances to be paid to cyclists for business related trips (in the public sector) and work to ensure that the rates paid to cyclists are the same as those paid to drivers. This has symbolic importance as well as a true monetary incentivising value. While it is not possible to direct private organisations to adopt a higher mileage allowance for cycling trips, we will encourage them to do so	DoT + Department of Finance (DoF)
13.3	Indirect Tax System We will investigate possible options of using the indirect tax system to reduce the cost of bicycle purchase	DoF + Revenue Commissioners

04

Instruments: Financial Resources

Costs and Benefits of Investing in Cycling

Discussion

There are many benefits to investing in cycling, as described in Chapter 1. The fiscal benefits include:

- (i) the value of lost lives - i.e. the deaths which could have been prevented as a result of being physically active through cycling;
- (ii) savings to the Health Service Executive as a result of not having to treat illnesses which result from physical inactivity;
- (iii) gains in productivity arising from reducing absenteeism which is preventable through increased activity;
- (iv) reductions in (urban) congestion;
- (v) reduced emissions.

The extent of the benefits of cycling will vary depending on many factors.

It depends on the profile of new cyclists as well as the amount of cycling. Cycling contributes to improvements in levels of physical activity offering protection against chronic disease and premature death. The methods adopted produce higher values for older people who are encouraged to become active, than younger people.

The contribution to abating congestion and pollution rests on the extent to which new cycle trips replace car journeys, and the values associated with both congestion and pollution which are much higher in urban areas than rural areas.

A typical Cost Benefit Analysis (CBA) for a road (or public transport facility) will normally only consider the linear corridor itself. An investment in a cycling network will have an impact on an entire geographical area. It will have an impact on road safety within that area as well as a positive impact on the health of the population using that network. It has an area-wide positive impact, a societal effect, a living area effect. The methodology of a CBA for a road, as used by the World Bank, cannot be applied to assessing a cycling network. It is even more challenging to carry out a CBA of an entire cycling policy, such as this. International cycling (and walking) appraisal has only been developing over the last three of four years.

The SQW report examined four examples of cycling intervention. Each was shown to produce positive returns to investment. The highest value was found for the cycling training investment. Training is less expensive than physical development and where it can demonstrate even modest increases in levels of cycling it is likely to produce high returns. The London Cycle Network + also produced a strong Benefit to Cost Ratio (BCR). Links to Schools and Bike It are both initiatives targeted at school children. Links to Schools provides improved infrastructure and, as a result, also benefits other residents. Because of the physical infrastructure element it also has value to those using the existing routes and this

also strengthens the BCR. Even without any value for children’s health or accident prevention, Links to Schools produces a positive result.

There are potentially significant costs in implementing the National Cycling Policy Framework in full. Based on international experience and research in the Irish context, the Department of Transport considers that a benefit to cost ratio of 4:1 is achievable.

In summary, the subject of quantifying the costs and benefits of spending on cycling is complex but all the indications are that benefits significantly outweigh the costs.



No.	Policy	Implemented by
14.1	<p>International CBA</p> <p>There is, in fact, compelling evidence that the benefits of investing in cycling significantly outweigh the costs.</p> <p>We will carry out an assessment of the emerging international studies on valuing the benefits of cycling and apply these to an Irish context. This will include looking at spend per head on cycling provision in different countries.</p>	DoT
14.2	<p>Continuous Funding</p> <p>We acknowledge that there needs to be continuous funding of the NCPF over the short, medium and long term in order to achieve the broad aim of recreating cycling culture in Ireland.</p> <p>We will provide appropriate levels of, and timely, funding towards the implementation of the NCPF.</p>	DoF + DoT

05

Instruments: Legislation And Enforcement

Objective 15

Introduce changes to legislation to improve cyclist safety

Discussion

Cyclists in Ireland are not given the same legal protection as they are in other jurisdictions. A broad objective is to explore more fully the range of legislative and regulatory changes that are required to improve the safety of cyclists.

There is a case for adoption of the standard Northern European Hierarchy of speed limits with 30kph as the standard limit in core urban areas and with reduced limits applied on residential streets (home zones) and at large junctions where there are vulnerable road users in the traffic mix.



No.	Policy	Implemented by
15.1	<p data-bbox="304 264 555 295">Review of Legislation</p> <p data-bbox="304 315 1031 416">We will carry out a review of Irish road traffic legislation to change the balance in favour of the more sustainable modes such as walking and cycling.</p> <p data-bbox="304 436 991 535">Any revision of the legislation should also provide clarity on those aspects of the law relating to cycling, which are perceived to be ambiguous or uncertain. For example:</p> <ul data-bbox="304 551 991 703" style="list-style-type: none"> <li data-bbox="304 551 687 582">(i) the use of “Flashing LED lights”; <li data-bbox="304 598 991 658">(ii) the issues surrounding making it legal for cyclists to overtake on the left; <li data-bbox="304 674 979 703">(iii) cycling along canal towpaths, riverbanks and through parks. 	DoT
15.2	<p data-bbox="304 752 727 784">European Hierarchy of Speed Limits</p> <p data-bbox="304 804 1054 936">We will consider the adoption of the standard Northern European hierarchy of speed limits with 30kph as the standard limit in core urban areas and with reduced limits applied on residential streets and at large junctions used by vulnerable road users.</p>	DoT + LA’s
15.3	<p data-bbox="304 981 512 1012">Hierarchy of Care</p> <p data-bbox="304 1032 1046 1171">We will explore the concept of “Hierarchy of Care for Road Users” that is used in some Northern European countries to give more vulnerable road users additional legal protection on the roads, and advise on whether a similar system can and should be used in Ireland.</p>	DoT
15.4	<p data-bbox="304 1216 616 1247">Mandatory Use Regulation</p> <p data-bbox="304 1267 991 1368">We will revoke the Statutory Instrument that requires cyclists to use cycle tracks where they are provided - Road Traffic (Traffic and Parking) Amendment Regulations, S.I. No. 274 (1998).</p> <p data-bbox="304 1375 903 1406">This regulation is unsatisfactory for a number of reasons:</p> <ul data-bbox="304 1422 1070 1733" style="list-style-type: none"> <li data-bbox="304 1422 1031 1509">(i) it is clear that the cycling infrastructure that has been constructed to date is often of a poor standard and is poorly maintained, and cyclists are required to use it; <li data-bbox="304 1525 1070 1621">(ii) it can force cyclists to be on cycle tracks and (when they are planning on continuing straight ahead) to be on the inside of left-turning vehicles, including Heavy Goods Vehicles; <li data-bbox="304 1637 1070 1733">(iii) if a group of cyclists (on a weekend cycle for example) is using a road with an off-road cycle-track alongside it, then they are required to use it – which is not practicable. 	DoT
15.5	<p data-bbox="304 1783 596 1814">Maximum Speed Display</p> <p data-bbox="304 1834 1023 1895">We will require HGVs (as well as buses and coaches) to display their maximum allowable speed as in most EU jurisdictions.</p>	DoT



No.	Policy	Implemented by
15.6	<p>On the Spot Fines</p> <p>We will extend on the spot fines to infringements by cyclists.</p>	DoT + DoJE & LR
15.7	<p>Further Legal Changes</p> <p>We will introduce / explore other ideas to facilitate cyclists, such as the following:</p> <ul style="list-style-type: none"> (i) exempting cyclists from no-entry / one-way street restrictions in urban areas; (ii) “logo-only” routes / shared lane road markings such as the California style “shared lane road markings” or equivalent treatments that have been tried in Australia and Scotland and elsewhere. (iii) providing default exemptions of cyclists from restrictions in pedestrianised streets; 	DoT + DoJE & LR
15.8	<p>Selling Bicycles with Lights</p> <p>We will require retailers to sell bicycles fitted with legally compliant lights, with exemptions for particular types of bikes – e.g. specialist lightweight racing bikes or kiddies’ bikes.</p>	DoT

Objective 16

Improve enforcement of traffic laws to enhance cyclist safety and respect for cyclists

Discussion

There is a need for better enforcement of many traffic laws. For example, in 2005, it was shown that on urban arterial roads with a 50km/h speed limit, the observed free speeds of 91% of cars exceeded the limit.

No.	Policy	Implemented by
16.1	Urban Speed Enforcement We will give enforcement of urban speed limits greater priority. Should there be difficulties with the enforcement of lower speed limits, consideration will be given to alternative means to achieving this aim.	DoT, Gardaí, DoJE&LR
16.2	Enforcement of Other Traffic Laws We will examine and highlight the barriers preventing an effective enforcement regime for other traffic offences that affect cyclist safety. For example, (i) dangerous driving in (urban) areas; (ii) cyclists running red lights; (iii) illegal parking on cycle tracks; (iv) motor-bikes using bus-lanes etc. This study will link with the wider Road Safety Strategy 2007-2012.	DoT, RSA, Gardaí
16.3	Bicycle Mounted Gardaí We will increase the number of bicycle mounted Gardaí. Such an intervention re-inforces the notion that cyclists are an integral part of the city as well as having policing advantages. We will also develop a suitable cycling safety course to be given to all Garda Recruits.	Garda Síochána
16.4	Penalties We will explore – as part of a wider examination of traffic penalties (and legislative changes) – the scope for amending the penalties for motoring offences against cyclists.	DoT

Implementation: Human Resources And Coordination

Discussion

I - The Need for Co-operation and Co-ordination

There will be many separate bodies that will have a role in implementing the NCPF. The policy will inform and dove-tail with other policies and strategies. Experience from abroad indicates that implementation of policies to promote cycling must have a multi-level, multi-stakeholder approach. It is, therefore, critically important that there is good co-ordination and co-operation between all bodies, both horizontally and vertically. These include the following:

- (i) Government Departments, to include:
 - Transport
 - Environment, Heritage and Local Government
 - Education and Science
 - Community, Rural and Gaeltacht Affairs.
 - Health and Children
 - Arts, Sports and Tourism
 - Justice, Equality and Law Reform.

- (ii) Government Agencies, to include:
 - Road Safety Authority
 - National Roads Authority
 - Railway Procurement Agency
 - Quality Bus Network Project Office
 - Iarnód Éireann
 - Bus Éireann
 - Dublin Bus
 - Airport Authorities
 - Dublin Transportation Office/the proposed Dublin Transport Authority
 - Fáilte Ireland
 - Irish Sports Council
 - Health Service Executive
- (iii) Existing Interdepartmental / Interagency Committees
 - National Trails Advisory Committee (for example)
- (iv) Local Authorities – both urban and rural.
 - These are main “target groups” of the NCPF.
- (v) Non-governmental Organisations
 - Cycling Campaigns (Dublin, Galway, Cork, Dundalk, Waterford)
 - Cycling Ireland
 - Sustrans
 - Professional Bodies (EI, IPI, RTPI, IPH)
 - Academic Networks
 - Private Bus Operators, road hauliers and other stakeholders
 - The Bicycle Industry

II – Options for Co-ordination at a National Level

There are (at least) two distinct models for coordinating the implementation of the NCPF– one is to establish a new National Agency; another is to create a Cycle Office within a national department organisation. Both models have been used abroad.

The advantage of a separate national agency is that a dedicated mandate is established and resourced at national level to oversee the delivery of the policy. The disadvantage is that there is already a plethora of separate agencies in the public sector and it

takes time to set up a body, requiring legislation and institutional arrangements. A further disadvantage is that cycling may continue to be perceived as an activity and transportation mode separate from the rest of the transportation system. Therefore it may not succeed in one of the overarching aims of the NCPF, that is, to integrate cycling into the wider transportation and planning fields.

On the other hand a Cycle Office within an existing government department can be established quickly. The disadvantage is that the mandate could be lost to competing objectives and dedicated resourcing, and is more difficult to retain.

A third model, might be to review and amend the remit of an existing government agency so that it has the power to oversee the recommendations in this report.

All models need to be explored further to ascertain which will be best for an Irish cultural and institutional context and in light of the prevailing economic climate. The model developed needs to account for new agencies that are proposed (such as the Dublin Transport Authority) and the need for maximum efficiency in the organisation of public sector bodies. Pending further exploration, and bearing in mind the need to progress measures under this policy, responsibility for overseeing the implementation of the policy should be assigned to the Department of Transport.

III – Local (Authority) Level

There is a strong need for every Local Authority in the country, especially urban Local Authorities, to have local policies, objectives and action plans that are consistent with the NCPF. These plans should be informed by best international practice and local knowledge, and they must be embedded in the Development Plan and Local Area Plans, as well as other plans / instruments such as Integrated Framework Plans (IFPLUTS), Strategic Development Zones (STZ's) and masterplans. Such policies will be more robust if they have been created collaboratively by the officials/professional staff of the authority (including traffic engineers, planners, road safety education officials etc.), the elected members (especially those with particular responsibility for transportation policy such as the Chairperson of the Strategic Policy Committee) and the users. This latter group could consist of representatives from the local

cycling advocacy organization as well as those from the sports cycling group etc. This is the model that has been used in the “bicycle policy audits” created by South Dublin County Council, Dublin City Council, Cork City Council and (most recently) Waterford City Council.

It would also be useful for every local authority to have a Cycling Forum. This is a structure that would facilitate the cycling community / representative organisations in developing cycling policy and be involved in the implementation of policy. A Cycling Forum has recently been established in Dublin City Council. It brings together representatives from the cycling campaigning organizations, public health sector with engineers, the Gardaí and elected members. Cycling Forums are established structures in many Continental municipalities (and it is worth noting that the Cycle Forum in the City of Tillburg in the Netherlands includes the City Manager).

Within each Local Authority, there must be a figure who will take responsibility for and oversee the implementation of the cycling policy. Since the cycling policy cuts across all elements of transportation policy (and beyond), this must be a figure at an appropriate senior level in the organisation. The appointment of a “Cycling Officer” at too junior a level in the organisation may reinforce the idea that cycling is a separate, more marginal, mode. This has been the experience in some UK Local Authorities.

There currently is little formal or systematic contact between figures from separate Local Authorities who have responsibility for formulating and implementing cycling policy. There would appear to be a value in creating a formal network of those figures from all LA's so as to disseminate knowledge and share local experiences. There could be annual (or more regular) meetings of this network, ideally as part of wider gatherings of transportation professionals so as to forge the idea that cycling policy is an integral part of wider transportation policy. The network could also operate virtually, such as has happened in the UK with the Cycling Planning Groups e-Network. The network should also mesh with or have a formal relationship with (or include) the network of figures in Central Government Departments and Agencies that are involved in the development and implementation of cycling at a national level. Similarly it needs to incorporate the ideas and experiences of academics working in the area and the user groups. The overall

network should strengthen and evolve in order to make cycling policy mainstreamed – i.e. incorporated into all wider policy fields. The networks developed in Ireland should communicate with and become part of wider networks – such as those in other countries.

All in all, there needs to be a deepening of knowledge amongst transportation professionals of how to promote cycling. One of the main roles of the cycling contacts within each organisation would be to disseminate ideas and knowledge through that organisation as opposed to the knowledge staying with one person.

IV - Academia

There are a significant number of students / academics – at undergraduate, Masters, Doctorate and Post-doctorate levels – who have carried out or are carrying out theses in subjects relating to promoting cycling. These are taken in disciplines such as Transport Economics, Transport Planning, Traffic Engineering, Road Safety / Mechanical Engineering, Urban Design, Urban and Regional Planning, Public Health, Environmental Science, Medical and Health Sciences to name but a few. There is no systematic co-ordination of activities between these students / researchers and the knowledge that is being developed is not being disseminated or centralised. It is being lost. This needs to be addressed. Any network of academics in this field needs to be part of the other network described above.

Objective 17

Develop a structure that can coordinate the implementation of activities across the many government departments, agencies and ngo's

Discussion

Structures will need to be established at a national and local level. Separate government departments will need to combine their energies and work closely together. There also needs to be good co-operation between national and local levels and good co-ordination between all stakeholders.



No.	Policy	Implemented by
17.1	<p>Oversight of Implementation of the NCPF</p> <p>We will ensure that the Department of Transport will oversee the implementation of the NCPF.</p>	DoT
17.2	<p>National Advisory Forum</p> <p>We will establish a National Advisory Forum of stakeholders to advise the Department on the delivery of the NCPF. This could evolve from the many organisations who contributed in the initial consultation phase of the policy research.</p>	DoT
17.3	<p>Local Authority Cycling Officers</p> <p>We will require each Local Authority to assign an officer at an appropriate senior level as a “Cycling Officer”. He or she will establish a Cycle Forum and be responsible for overseeing the formulation and delivery of the local cycling policy. This policy must be embedded within wider transportation policies and in the statutory plans. He or she will also be responsible for the upskilling of staff within the local authority so as to ensure that the competencies exist to fully implement the policies.</p>	DEH&LG, DoT, LA’s
17.4	<p>Networks of Cycling Experts</p> <p>We will facilitate in the creation of networks of cycling experts at all levels – Local Authority, central government / agencies, virtual networks, academic.</p>	DoT

No.	Policy	Implemented by
17.5	<p>Optimum Arrangements for Implementation</p> <p>After an initial period we will review progress, explore options and consider any necessary changes in the arrangements to ensure that the ambition in this policy continues to be realised.</p>	DoT
17.6	<p>Adapted Remit for Existing Agency</p> <p>We will explore how the NRA could have its remit developed so as to have responsibility for implementing certain elements of the NCPF relating to infrastructure.</p>	DoT

Objective 18

Provide design professionals with suitable training / guidance to develop and implement the policies of the ncpf. Support the deepening of knowledge of the subject of planning for cyclists in Ireland.

Discussion

Design professionals need to be aware of and trained in the new tools that are required to bring about a complete change in the way that towns are planned so that the urban (and rural) environment is transformed for pedestrians and cyclists.

No.	Policy	Implemented by
18.1	<p>Third Level Education</p> <p>We will work to explore how Irish third level civil engineering / transport planning / urban design departments can offer undergraduates and post-graduates instruction on the safety issues involved in providing for vulnerable road users and, more generally, on planning for the more sustainable modes.</p>	DoT / DoES
18.2	<p>Centre of Knowledge</p> <p>We will support the development of a centre of knowledge in planning for cycling (perhaps in one of the universities or within a Research Department of the Road Safety Authority). We will examine examples from abroad in which such centres have been created. Such an Irish centre would concentrate the knowledge developed around the country and it could liaise closely with universities and research institutes abroad as well as the Department of Transport.</p>	DoT
18.3	<p>Training of Professionals</p> <p>We will organise training workshops / sessions for all design professionals in understanding and using the new guidance produced.</p> <p>We will also stipulate that all local authority roads engineers and any engineer wishing to tender for government road contracts should be required to have taken an approved cycling skills course, together with a course on cycling friendly infrastructure design.</p>	DoT + LA's

No.	Policy	Implemented by
18.4	<p>New Cycle Guidelines Manual</p> <p>We will produce new Design Guidance to supersede the existing Cycle Guidelines Manual / Traffic Management Manual produced by the Dublin Transportation Office to reflect best international practice and latest thinking on creating a cycling friendly infrastructure.</p> <p>We will ensure that the new guidance developed is consistent with new guidance on Urban Design Policy (Policy 1.4) and informs a revision of the Design Manual for Roads and Bridges and other relevant guidance and standards.</p>	<p>DTO / DoT</p>
18.5	<p>Annual Conference on Cycling Planning</p> <p>We will organise an annual conference on cycling planning / promotion that will bring together experts from the academic, private, public and voluntary sectors with the aim of sharing experiences and the latest research in providing for cyclists. It will also provide an opportunity to assess progress in implementing an NCPF.</p>	<p>DoT</p>
18.6	<p>International Collaboration</p> <p>We will provide support for the further training of relevant engineers / planners / policy measures through sending them to international conferences and training events / workshops such as the Velo-city Cycling Planning conference</p>	<p>DoT</p>
18.7	<p>Virtual Network of Experts</p> <p>We will examine the UK experiences of developing a “Cycling Planning” virtual network / group of cycling planning experts with a view to establishing a similar network in Ireland, or perhaps linking with that group. Again the purpose of this is to raise the level of understanding of cycling engineering / safety / planning issues.</p>	<p>DoT</p>
18.8	<p>Irish Best Practice Database</p> <p>We will support the creation of a “best practice” database of Irish examples of cycling friendly designs, schemes, initiatives etc. This database could link with and draw upon European best practice databases such as BYPAD and Velo-Info, ELTIS etc.</p>	<p>DoT</p>



07

Evaluation and Effects

Objective 19

Evaluate the national cycle policy framework and monitor the success as the measures are implemented.

Discussion

There is lack of quality data on cycling numbers and cycling accidents in Ireland. While the census provides 5-yearly data on cycling numbers, there is a lack of accurate data on cycle use for particular routes in particular cities. While the numbers of cyclists, and number (and severity) of cycle casualties are the most important indicators, it is also important to monitor the numbers of bikes sold and the spend on public infrastructure, provided it is designed to a desired standard. The use of an indicator measuring the number of kilometers of cycle-tracks / cycle-lanes constructed may not be a useful indicator. This is because it is the design of junctions which has the

greatest impact on cycle safety and the attractiveness of a route rather than the longer stretches of links. Furthermore it is acknowledged that the quality of the facilities constructed (and maintained) to date has been, in many cases, inadequate.

Another indicator which has both qualitative and quantitative dimensions, and which could be considered for use, is the number / share of parents who transport their young children on the bike (and the number / share of (Primary) school pupils cycling to school). These are good measurable and useful expressions of how safe the streets are perceived to be by the public. Countries with high cycle use, such as Denmark and the Netherland have many children being ferried around by bike.



No.	Policy	Implemented by
19.1	<p>Monitoring Framework</p> <p>We will develop a monitoring framework to measure progress in achieving specific 19 objectives and many policies .</p> <p>The policy indicators will have a qualitative and quantitative dimension.</p>	DoT
19.2	<p>Indicators</p> <p>We note that the two important indicators are:</p> <p>(i) numbers of cyclists/modal share.</p> <p>(ii) numbers of cycle accidents of different severities.</p> <p>We will develop systems to closely monitor trends in these two indicators in all urban and rural areas.</p>	DoT
19.3	<p>Accident Reporting</p> <p>We recognise that there is an under-reporting of accidents to the Gardaí but that hospitals pick up on many accidents involving cyclists, We will develop and implement a system that correlates between the databases. This will feed into the work carried out by the RSA.</p>	DoT + LA's + RSA
19.4	<p>Study of Cycle Accidents</p> <p>We will commission and produce a detailed analysis of allfatal / serious cycle accidents over (an approximate) 10 year period 15.</p>	DoT + RSA
19.5	<p>User Satisfaction Surveys</p> <p>We will arrange other surveys that are deemed necessary such as user satisfaction surveys (every two years).</p>	DoT

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Addicted to cars; the role of car parking revenue for Irish local authorities and implications for state policy.



Pre-Budget 2017 discussion document

Summary

We have identified a threat to state transport policies, where Irish local authorities may have a financial interest in encouraging more and more use of private cars. Local Authority managers may view it as in their direct interests to promote cars by using measures that discourage pedestrians, cyclists and public transport users. The state must act to remove reasons, whether financial or cultural, for promoting private cars instead of other transport modes. Local authorities must face financial penalties where they take road space away from sustainable transport to promote private cars. An obvious measure is to bring in a strategic state levy on car parking. This would also allow the state to support local town centres facing competition from out-of-town retail developments, and could be used to support park-and-ride schemes.

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Main Discussion

Formed after a large public meeting in 1998, the Galway Cycling Campaign (www.galwaycycling.org) aims to promote the needs of ordinary everyday bicycle users. Our aims include: safer conditions for cycling, planning that gives equal priority to all road users, improvement of facilities, secure parking for bikes, and recognising the rights and responsibilities of all road users.

The issues faced by cyclists in Galway are driven by national policies and practices and are shared with cyclists in other towns. Our proposals therefore have a general focus and impact. They also have an impact outside of cycling and serve to support walking, public transport and the commercial and community life of our towns and cities.

The difficulties Irish cyclists face often result from the systematic promotion of motorised traffic, particularly private cars, over the needs of other road users. This is partly a product of a particular “corporate culture” at local authority (LA) level, for example the use of hostile road designs such as roundabouts. But it may also be driven by financial considerations created by LA funding structures. The state has invested in measures intended to promote sustainable travel such as walking, cycling and public transport, yet little overall growth has been seen. The way local authorities use funds for sustainable transport often creates new problems or avoids fixing old ones. Unless the reasons for this are identified and fixed, the benefits from funding sustainable transport will be restricted. Worse: a situation continues where state funds meant to support sustainable transport end up being used essentially to facilitate car travel.

Removing road space from cyclists: Car parking and its place in local government finance



In various Irish towns road space has been taken from cyclists in order to provide on-street car parking. The traffic lanes that are left may be narrow, forcing cyclists into close proximity with heavy traffic. Although cycle facilities may be found on peripheral roads with low parking demand, they often seem to disappear just where they are needed, with cyclists finding their way blocked by parked cars and traffic jams. Regardless of whether or not specific cycling facilities are provided, cyclists require road space so they can keep moving and have some clearance from passing cars. The Irish cycling experience is that this road space often disappears close to town centres. This is one of the factors driving footpath cycling which is unlawful, inconveniences pedestrians and introduces additional risks for cyclists.

A particularly problematic example of how on-street parking can create a barrier to cycling is the creation of one-way streets so as to facilitate the dedication of road space to car parking. In the appendix below, we provide examples of cases where LAs have imposed one-way streets that effectively make it illegal for children to cycle to school.

Providing more space for cyclists and pedestrians

The reason many cities in Northern Europe have more space for cyclists and pedestrians is that they took it away from cars. A 2011 review of European parking policy states: “*Removal of on-street parking from historic districts and central shopping streets has become a signature feature of many European cities*”.ⁱ Some examples from that source:

- In the 1960s Copenhagen started removing car parking from the city centre. The space for some of Copenhagen’s cycle tracks was obtained by removing car parking. Between 2002 and 2008 Copenhagen replaced 219 parking spaces with cycle tracks removing on average 32 parking spots per year. Car-parking spaces are also replaced with bike parking. The on-street parking capacity taken away is replaced by off-street car parking.
- Between 2003 and 2011 Paris reduced its parking supply by 14,300 spaces and imposed parking fees on 95% of the spaces that were left. An estimated 4,000 parking bays were taken out to provide 1,451 new stations for about 20,000 Velib public rental bikes.
- Amsterdam has placed limits on parking supply and discourages new car parking spaces in zones close to public transport hubs. In Amsterdam, car parking in the historic core of the city costs €5 per hour.
- In 1996, Zurich placed a cap on parking supply in the city-centre, new off-street parking spaces must be matched by the removal of the same number of on-street spaces.

The role of car parking in local authority finances

Historically, Irish local government funding has been highly centralised, with much funding locked into specific projects agreed with central government and a very limited amount of ‘discretionary’ funding. Car parking fees, both from on-street and off-street parking are one important source of revenue which LAs can raise themselves and they are incentivised to maximise this revenue.

The success of car parking as a local authority business has been mixed.ⁱⁱ Some LAs appear to have lost money after investing in charging equipment,^{iii,iv,v} but other LAs – particularly in larger towns and cities – have found car parking to be a successful business. Figures in a 2010 report for the Irish Parking Association show that nationally, Irish LAs accounted for 27% of car-parking capacity and 33% of parking revenue.^{vi} The LA component of the business accounted for €115 million in annual revenue. The report does not give a break down for all towns but indicates that Dublin City Council has annual parking revenue of €36m from its parking activities. The report states that the three Dublin county councils generate more than €10m each year in parking revenue. The other four main city councils, i.e. Cork, Galway, Limerick and Waterford, are stated to have had a combined annual parking turnover of almost €20m. The report also reports “significant” parking revenue for other LAs as follows. Kilkenny (€3m); Clonmel (€1.9m); Wexford Borough Council (€1.8m). Sligo Borough Council (€1.7m); Ennis (€1.6m); Drogheda (€1.3m); Bray (€1.25m); Naas (€1.1m); Castlebar (€1m).

On-street parking is a large part of the car parking managed by Irish LAs, but they also operate concentrations of off-street car parking for financial gain. In Galway city, there is a possibly unusual situation where two local authorities operate paid parking facilities in the city centre. In addition to city council car parks, at weekends the county council runs its own paid car parking facility on lands attached to the county buildings. Galway Harbour reportedly makes more

money from car parking and rental activities than from port activities.^{vii}

In places like central Dublin, demand for car parking will always exceed supply. Shifts from driving to other forms of transport are unlikely to be seen as a threat here. In smaller towns, a reliance on parking revenue means that many LA managers may think the direct financial interests of the authority require them to attract as many car trips as possible into towns. A successful sustainable travel promotion programme, which would turn car-users towards walking, cycling and public transport, may be seen as a direct threat to this revenue source. It could still 'make sense' to draw down central funds for cycling or other schemes, as long as these could be used in a way that did not interfere with the prioritisation of car travel. A relevant observation here is that some Irish towns have remarkably few cycle parking spaces despite spending money on cycle facilities, which implies an intention to discourage cycling into towns, even while spending money on other measures targeted at cyclists (Galway City being a particular example.) In Galway City, if a couple decide to take public transport to the city centre to do their shopping the return trip will cost them €8. If they bring their car instead they can get all day parking in a council car park for €4. The council is effectively operating in competition with state subsidised public transport services.

This is speculation; we do not have the resources to look at Irish car parking policy in enough detail to say if a successful sustainable travel programme is a real financial threat to any given LA. But it is clear that providing space for cyclists, where most needed, can be seen as against the LA's financial interests. Indeed, in some cases key measures in implementing state Smarter Travel projects have simply been ignored – for example the Galway City Public Bike scheme, discussed in Appendix 1.

A need for permit-only parking schemes

There is a perception by some that LA parking loses money so this must be discussed. All parking is not the same: paid parking on strategic routes may pay for itself handsomely, while parking in areas such as minor residential roads and housing estates may lose money. Why would LAs implement paid parking at locations where they lose money? The answer is simple: because of demand from residents. In some residential areas with "free" parking, non-resident commuters may take advantage by also parking their cars. Residents then demand action to preserve parking for their own use. Ireland already lacks basic legislation to manage roads and parking. Elsewhere it is possible to simply make designated roads "residents only" or "residents parking only", but Irish LAs only have power to implement paid parking or "disk parking". The only legal mechanism available may be to implement disk parking along with all the accompanying measures: line painting, ticket machines and so on, then to issue permits to residents. Outside commuters may then move elsewhere to park, further reducing the returns for the ticket machines, etc. This approach uses a sledgehammer to crack a nut. The solution is to introduce laws allowing access or parking on certain roads to be limited to people who hold permits issued by the local council. The LA may then charge for parking permits and avoid unnecessary costs for the measures that go with disk parking. The legal concept of resident-only streets and permit-only parking is well established in Germany.

The Irish state needs to step in

If some Irish local authorities view the promotion of car use as in their immediate financial self-interest, then clearly they cannot be used as the main agencies in growing sustainable transport. If on-street car parking is treated as untouchable, then a state effort focused on funding roadside cycle facilities cannot deliver for cyclists in many Irish town and city centres. An exception might be the parts of Dublin where the Wide Streets Commission of the 1700s created many very wide streets. These may have enough space to combine both generous on-street car parking and cycle facilities. This width may not be generally available in most other Irish towns.

Local authorities' ability to earn money from car parking creates a direct conflict of interest regarding state efforts to promote sustainable transport. Paid car parking gives Irish LAs a direct incentive to pursue growth in car traffic and encourage greater use of cars. By permitting LAs to charge for parking on streets, the state is encouraging them to take road space away from other forms of transport such as cycling. Even where on-street parking is free, it still represents the removal of road space from other forms of transport, and a way must be found to address this. If LAs are permitted to operate off-street car parking for profit, then they have an incentive to promote private cars over other forms of transport.

We need measures to identify, and financially penalise, roads authorities that misuse roads capacity on main routes for car parking. Other countries have faced similar issues. A document on Danish Cycling policy states: *“New parking spaces requiring fees or higher rates are, however, subject to Danish government restrictions based on the idea that the local authorities should not use paid parking as a source of revenue. This means that such income is deducted from government subsidies.”*^{viii}

The solution: Strategic car parking levies

The damaging financial incentives that have been created partly result from the abolition of local rates in the 1970s. Now that property taxes are being restored, this provides an alternative income stream that allows a rebalancing of LA activities in a positive direction. If the state wishes to grow sustainable transport, then it must act directly to remove incentives that promote car use. It must also act to correct local authority actions that promote private cars and damage and discourage other forms of transport. There must be a way to penalise LAs that take road space away from cyclists and public transport on key routes for the purpose of parking cars. There may be a strategic need to provide off-street car parking in towns but LAs should not profit with the result that promoting car travel becomes an end in itself. As a first step, the state needs to financially penalise on-street car parking on key corridors particularly where it involves one-way street restrictions. The state must also make all other LA parking revenue-neutral. It is intended that this will result in the removal of on-street car parking.

It is likely that town-centre business interests will react with consternation and panic to the idea of any car-parking being interfered with. This is a natural reaction and their genuine concerns must be addressed. The solution we propose is for the state to introduce strategic levies on car parking supply. As shown below, these could also have other uses apart from aligning local authority behaviour with state policy. The scheme should be structured so that it is flexible and can be applied by order rather than requiring primary legislation for any changes. A system of levies that could be applied either to local authority parking or other locations might offer the simplest overall mechanism for delivering on state goals.

Rebalancing retail and other services in favour of local town centres

Town centre retailers and other businesses tend to view widespread on-street car parking as good for their interests. Town centre retailers tend to portray parking charges as driving customers towards out-of-town shopping developments. It is difficult not to feel some sympathy for this position in cases where poor planning has allowed large out-of-town shopping centres to out-compete our established town centres. They are correct that the issue must be addressed, but they may be looking at the problem from the wrong end.

The underlying problem is that out-of-town centres have been allowed an unfair advantage by offering free car parking. The solution is not through a race to the bottom by pursuing free car parking at all costs at all locations, but rather measures to rebalance the playing field. The greater societal good is served by applying tax measures that favour the relocation of retail services to places in the communities they serve. Many out-of-town shopping centres should never have been permitted. Where the nature of the business required an out-of-town location, they should not have been permitted to also attract tenants that compete with town centre activities.

An obvious way to tackle this unfair advantage is to apply car parking levies to out-of-town shopping centres. Town centres must control demand for car parking, and charges are an obvious way to do this. If town centres cannot avoid parking charges, then out-of-town shopping centres should not be permitted to avoid parking charges. The purpose of out-of-town shopping centres should be to offer services that cannot be offered in town centres. Owners of such premises should be blocked from trying to compete in other market segments. Mandatory parking charges through a state-imposed strategic parking levy would help achieve this.

Park and ride

Park-and-ride schemes are sometimes proposed as a way to tackle traffic congestion in our larger cities. The idea is that potential users of long-term car parking drive to car parks on the city outskirts, where they change to public transport for the journey to the city centre. There is often some form of state investment, either in providing the physical site or the public transport that services it. If car-commuters have a ready supply of cheap long-term car parking at their destination, this discourages them from using the park-and-ride service. The result is a loss on the state's investment and a failure to tackle the congestion that was the original purpose of the scheme. If the LA also provides city-centre parking, this creates a conflict of interest in the outcome of the park-and-ride programme.

To support Park and Ride (and public transport generally) the state must step in to restrict the availability of cheap, long-term car parking in city centres. A strategic parking levy is a way to do this. It would allow a minimum price to be imposed at strategic locations and hence support alternatives provided by the taxpayer. In this situation the levies would be imposed not just on local authority parking but on private operators as well.

Appendix 1: Public Bike Share in Galway

Public bike share schemes have proved very popular. The Irish state recently invested in a scheme for Galway, with funds spent installing stations and providing the bikes and associated services to support it. This investment was based on a 2011 report for the National Transport Authority examining the potential for bike share schemes in Galway and other cities.^{ix} The report referred several times to the need for two-way (contraflow) cycling arrangements on one-way streets, e.g.: *“Recommendations are made on the complementary measures which would be needed as a new scheme is introduced. Perhaps the most important one would be an increase in permeability for cycle traffic in the city centres through the provision of two-way cycling on one-way streets, and by opening up pedestrianised areas to cycling where conditions allow.”* Despite this, no changes were made to the one-way-street system in Galway to support Bikeshare, and no such streets in Galway are currently two-way for cyclists. Another curiosity is that at some locations existing bike parking was removed to install Bikeshare stations. It is a widely held belief, among all stakeholders, that the bike scheme in Galway has been a failure.

Two-way cycling on suitable one-way streets has a good safety record abroad, and is provided for under Irish law (SI273/98, SI274/98). Bremen in Germany started providing two-way cycling in 1980. In Belgium, all one-way streets in 50kph zones can be made two-way for cyclists where conditions allow. A similar situation applies in France for 30kph zones. In 1979 a report published by An Foras Forbartha (The National Institute for Physical Planning and Construction Research) recommended the provision of contraflow cycling on Galway city’s one-way streets.^x The 1999 Galway City Development Plan had an objective of providing a contraflow cycle lane on a one-way street in the city. In 2004, Galway’s elected city council put a specific objective into the 2005–11 city development plan to provide two-way cycling on one-way streets where feasible. This objective was restated in the 2011 city development plan. There are no major legislative, political or safety obstacles to fixing one-way streets in Galway city.

So there is a 35-year history of official proposals for two-way cycling on Galway’s one-way streets – yet nothing has been done. A bike share scheme was proposed for Galway with the recommendation that one-way streets be made two-way for cyclists. But when the scheme was applied, with state funds, it did not bring in this key supporting measure. The question must be asked: Why would Galway city council spend state funds in a manner that directly undermines the recommendations of the report that justified their use? Could it be because if the council made these streets two-way for cyclists, they would have to take out disk parking spaces and lose the income? A state-imposed strategic parking levy that dealt with one-way streets would resolve this matter.



Galway City: Google Street View showing Market St. at the Connacht Tribune Office. The street is one-way going towards the viewer. There is a Bikeshare station on Mainguard Street near St Nicholas Church in the background. The distance to the next Bikeshare station at Newtownsmith is 350m. Because of the one-way street system and a ban on cycling in the pedestrian zone, the return journey from Newtownsmith to Mainguard St. is 1.1km by the northern Route and 2.1 km by the southern route. In the background is St Patricks National School - schoolchildren face similar diversions. The disk parking arrangements with painted parking lanes and ticket machines can be seen.

Appendix 2: The impact of one-way streets and disk parking on school children

The pictures below show situations where Galway city and county councils have effectively made it illegal for children to cycle to school by the most direct route. Examples in Galway city include the “Bish” Secondary School in Nuns Island and Scoil Náisiúnta Iognáid in Raleigh Row. In the county town of Tuam there are three schools near the centre on the Dublin Road, yet the county council has made a strategic section of this road one-way – apparently to provide disk parking. Two primary schools (the Mercy and Presentation Convent) and one post-primary school (St Bridget’s) are affected. The net effect is to make it illegal for children from the south side of town to cycle to school. It also makes it illegal for children from the north side to cycle home by the most direct route. In Loughrea there are two primary and two post-primary schools in the Moore St/Cross St area. But the county council has made Moore St one-way, again effectively banning some children from cycling to school by the most convenient route.



**Nuns island, home of the "Bish" secondary school. Historically the Bish had one of the highest rates of cycling in the city (24%)
Do you think its right to make it illegal to cycle to school?**

Galway City: Galway Cycling Campaign poster highlighting the issue of one-way streets and severance for schoolchildren.



Tuam: Google Street View showing Dublin Rd at the Presentation Convent school. The road is one-way, making it illegal for schoolchildren to cycle in both directions. The disk parking arrangements with painted parking lanes and ticket machines can be seen.



Tuam: Google Street View showing Dublin Rd at the Mercy Convent school. The road is one-way, making it illegal for schoolchildren to cycle in both directions. The disk parking arrangements with painted parking lanes and ticket machines can be seen.



Tuam: Google Street View showing Dublin Rd at St Bridget's post-primary school. The road is one-way, making it illegal for schoolchildren to cycle in both directions. The disk parking arrangements with painted parking lanes can be seen.

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Galway Cycling Campaign

<http://www.galwaycycling.org/>

Submission on How the State can make Ireland a leader in tackling climate change

August 2017

Summary

Reducing private car use and increasing walking, cycling and public transport use is an obvious way of reducing greenhouse gas emissions. Ireland is also in the lucky position of having historically had a strong cycling culture that can still be tapped into. The challenge in Ireland is not getting people to walk or cycle but the systematic creation by the state of a built environment that is hostile to walking and cycling.

This hostile environment is a product of the Irish state's overwhelming focus on promoting and facilitating travel by private car. When discussing cycling or walking the facilities found in the Netherlands, Denmark and Germany attract much focus. This is in part a distraction. These European systems are possible because a decision was made to use land for a purpose other than facilitating cars. The facilities work, in part, because they are part of a system designed to restrict traffic growth and to remove inappropriate motor traffic from places where it is not suitable. In Ireland the opposite approach is seen where nationally the apparent goal of state actors is to promote and even impose private car use to the greatest extent possible. The Irish state has adopted best practice in the form of the National Cycle Policy Framework. The problems faced by cycling and walking derive mainly from car-promotion. Properly functioning cycling and walking facilities are not possible if they are being designed and constructed by engineers whose goal is to promote cars. The problems cannot be solved unless there is leadership prepared to challenge unrestricted car-use.

Rather than overload the citizens assembly with all the different ways that cycling and walking can be enabled we pick out several key strategic policy areas. These require fundamental change and will be controversial but must be addressed if we are to reduce reliance on private cars for travel. It is in these areas that strong leadership from the citizens assembly could create a better Ireland for all citizens. Most of the main submission is derived from previous submissions.

Key recommendations

- The state must recognise that roads have a range of functions and that it is not appropriate to permit through traffic on all roads.
- The ongoing motorway program has been a transport disaster for the state. The state needs to abandon the current motorway program and revert to the approach set out in the 1998 roads needs study - based on upgrading existing links and constructing a system of town and village bypasses.

- Removal of financial incentives to promote cars from Irish Local Authorities and a system of parking levies to protect town centres.
- A national program is needed to address the problems caused by cul-de-sac based housing estates.
- Delivery of the National Cycle Policy Framework

Introduction

Ireland has historically has a robust cycling culture. The “High Nellie” bike is widely used as an icon of rural and small town Ireland. Although the daily use of bicycles has fallen considerably, Irish people have a proven ability to get back on their bikes if the right conditions can be created. Census data showing low numbers of people cycling to work or school do not show the whole picture. For instance according to CSO Travel surveys more Irish people cycle than use Rail, Dart or Luas combined. This should be considered against the vast inequality of funding the rail gets compared with cycling. In 2007, a Department of Health funded study estimated that 28% of Irish adults had cycled in the previous year.¹ The success of the Dublin bikeshare scheme shows the vast untapped potential for cycling in Ireland.

The reason cycling is struggling in Ireland is not mainly down to an image problem or lack of familiarity. What has happened is that state actors have worked systematically to create conditions that were hostile to walking and cycling. The apparent purpose of those state actors was to promote car-use regardless of the wider consequences. In our view it is not possible to discuss promoting walking or cycling in Ireland without confronting and challenging the state’s overwhelming focus on promoting car travel over other modes. Challenging and reversing the promotion of cars over other forms of transport will also be necessary if Ireland is to be taken seriously on climate change. The state has already produced a keystone document, the *National Cycle Policy Framework* (2009), this sets out a credible and achievable system whereby the state could restore cycling (and walking) in Ireland. The NCPF was a landmark document but little has happened on the ground. Rather than restate the NCPF we feel the best approach is to address some of the institutional obstacles that are blocking its implementation. (We give a summary of the main solutions at the end). Pressure of time means we can only give a flavour of the issues.

The issue of through-traffic in towns and the great Irish motorway mistake.

Outside observers of the Netherlands, Denmark or Germany often tend to focus on the obvious cycle facilities. This can miss the big picture which is how their towns got the space for walking and cycling. In the Netherlands and elsewhere planners go to great lengths to “unravel” traffic so the arterial through-traffic is separated from local traffic. Roads are deemed to have a range of potential functions besides just catering for cars. Local roads have different functions than arterial roads and are managed accordingly. It is especially important to keep HGVs away from roads used by cyclists and walkers particularly children.

In most European cities with high cycling levels, a key feature is active motorised traffic removal and reduction programmes. Even in the neighbouring UK, Cambridge, Oxford and York are distinguished from other cities by the fact that they have long had policies in place to limit traffic growth.

Bremen was one of the first cities to use traffic cells (sometimes called Auto-restricted zones). The Swedish city of Gothenburg has adopted a similar system. The Dutch city of Groningen removed motorways from the city centre and implemented a system of four zones that cannot be crossed by private

motor-traffic, which must use the ring road instead. Cyclists and other traffic pass freely between the zones, and cycling now accounts for at least 50% of trips.²

To quote a US Federal Highway Administration case study³.

Traffic chaos during the 1969 Christmas season was, apparently, the inspiration for the city of Gothenburg in Sweden to restrain traffic for the economic survival of the city. The downtown area of the city was divided into five "cells" and cars were prevented from crossing the boundaries between these cells. Instead, to move from one to another drivers have to return to an inner ring-road and circle around to the entrance to the next cell. Public transport vehicles, bicycles and pedestrians are allowed to cross the cell boundaries.

In addition to the traffic cells, public transport was improved, parking spaces were reduced and made more expensive and an extensive public information system was put in place. The combination of measures worked well [...] The Dutch city of Groningen introduced a similar traffic circulation plan in 1977 and achieved a 44 percent reduction in the number of cars and vans in the central area in the first year. Bus travel rose 12 percent and bicycling and walking increased substantially.

In the 1970s the Dutch city of Delft began restricting private car traffic from crossing the city centre.

1970's: Necessary repairs on two bridges in the middle of the city center were an opportunity to get rid of most of the motorized through traffic. In some parts of the historic center (about 1,000m wide and 1,500 long) a system of loops was introduced, meaning that cars entering from one side have to leave on the same side of the city center. An exception is made for the local buses. Nowadays it hard to imagine how many cars used to force themselves through narrow streets and tight corners.⁴

The Irish National Cycle Policy Framework lists such measures as one of its key objectives in restoring cyclist access to Irish towns.

2.3 Through Traffic

We will support local authorities in removing through-traffic from urban centres and school routes through, amongst other measures, the provision of a national programme of ring-roads and town / village by-passes. As these are built, other measures to make the town centre more bicycle friendly should be introduced: environmental traffic cells, bridge / road closures, removal of spare lanes at signalised junctions, dismantling of one-way street systems, removal / modifications of roundabouts etc.

A key point is that what is needed is not merely traffic-reduction but the removal of through-traffic (eg traffic that is passing through rather than having business in the area.) In order for towns and villages to remove through-traffic there must be an alternative route available. This means that if Ireland is to increase walking or cycling there is a need for a national program of complete town ring roads. In fact at one time this was national policy. The following is an extract from the 1998 Irish Roads Needs Study. It recommended a concentration on town bypasses.

Current roads policy in Ireland, therefore, aims at an overall balance, focuses on key economic corridors, supports an adequate dispersal of economic development and seeks to bypass congested towns and villages. It concentrates on:-

- *Upgrading and realigning existing roads, rather than building unnecessary new roads.*
- *Bypasses to relieve congestion.*
- *Minimising the construction of new roads and motorways.*

The Roads Programme will continue to target bottlenecks which represent inefficiencies in the infrastructural system. Increasing urban congestion can have a negative social and environmental impact on communities, requiring diversion of the major traffic away from such areas, where practicable. The adverse impacts of roads infrastructure (and road traffic) on wildlife and biodiversity will be reduced through appropriate design (tunnels and crossing points for wildlife) and conservation of the archaeological heritage.

If Ireland had followed this policy we would have had a good basis on which to promote walking, cycling and public transport in our towns. Instead what happened was a motorway programme that was adopted against best advice both then and now. We could have constructed a balanced roads network based on town and village bypasses and upgrading existing links. Instead successive governments have followed a practice of diverting scarce resources into building new motorways. This has been an enormous mistake. The absence of the needed ring roads infrastructure means that traffic trying to reach main roads and motorways must still travel through our town and village centres.

Instead of spending roads budgets for the wider benefit of society, the state arguably pandered to ego projects for the car and roads lobbies. The result has been the wholesale reinforcement of car dependency. Traffic trying to reach the motorways still drives straight through the centre of intervening towns and villages thereby imposing avoidable danger and forcing local residents into cars for their own safety and that of their children. There is a direct conflict between a policy of pushing arterial traffic into our town centres and then claiming to want to use the same road space as a resource for cycling and walking.

If Ireland wants to be taken seriously on climate change then there is a need to set aside the motorway programme as an expensive mistake and go back to the more enlightened policies of the 1990s. The state cannot credibly claim to be delivering on the National Cycle Policy Framework without a programme of ring road construction. Irish local authorities are also left with downgraded "N" roads that they still have to maintain but don't have the needed resources.

The issue of local authority funding and car promotion

It is futile to discuss cycling facilities in an environment where local authorities generate cash flow from using the same road space for car parking. In our analysis parking income gives Irish local authorities a direct financial incentive to encourage private motor traffic and discourage alternative modes of travel. The existence of such incentives offers an obvious explanation for actions that otherwise defy rational explanation - such as building cycle facilities that systematically remove priority from cyclists to give it to cars. This prioritisation of car-travel is often achieved directly or indirectly by the deprioritisation, active obstruction and endangerment of active travel modes such as cycling and walking. Even where walking or cycling facilities are provided they are often engineered in a manner that represents the management

of the target users for the benefit of motor traffic. In our view such incentives must be directly challenged and reversed if Ireland is to have any hope of reducing transport emissions. If not then funds directed to "smarter travel" projects will continue to be used for the opposite purpose.

Please see attached discussion document.

- Addicted to cars; the role of car parking revenue for Irish local authorities and implications for state policy. (Pre-Budget 2016 discussion document)

The issue of car based town planning – cul-de-sacs

In the Netherlands and elsewhere planners work to ensure that cyclists and walkers have access to a network of routes away from roads. In Ireland we have the opposite practice, in some parts of Galway, cul-de-sac based estates or even deliberate road closures have made walking and cycling awkward and inconvenient. It is likely that this issue will be found in other towns and cities.

Restoring cyclist and pedestrian access to parts of the city, particularly for school travel, will require measures to restore or create permeability for walking and cycling. Measures will include knocking down walls between housing estates, providing wheeling ramps and steps, providing pedestrian and cyclist access from housing estates to local roads by the shortest possible route. In some locations, particularly Knocknacarra, it may be necessary to buy adjacent properties and demolish them in order to construct the type of secondary roads network found in Dutch and German cities. It is unlikely that political leadership will be forthcoming

The illustration below shows two Galway houses "A" and "B" in Knocknacarra. Both houses are within 230m of the nearest retail park. Because of the way the area has been planned by Galway City council somebody from house "B" must travel nearly 700m to get to the nearest access to the retail park. Somebody from house "A" must travel 2.1km by the southern route and 2.3km by the northern route. This is state imposed car-dependency in action. If Ireland is serious about tackling climate change, investment and leadership is needed to undo decades of state imposed car dependency.



Figure: This satellite photo of Knocknacarra from Google maps shows the routes forced on people from two neighbouring houses (red and green) when walking or cycling to local shops, businesses, and leisure facilities (yellow shapes). Because of "impermeable" car-centred planning, people on the red route have a much longer journey to go the same distance and, regardless of age, must use main roads for much of their journey.

Delivery of the National Cycle Policy Framework

We restate below the Hierarchy of Solutions from the National Cycle Policy Framework

Hierarchy of Solutions – Irish National Cycle Policy Framework 2009

A new approach to the design of urban roads in which the car does not dominate is required. There must be a greater focus on the "Hierarchy of Solutions" (as was developed in The Netherlands originally and explained in the 1996 UK Cycling Friendly Infrastructure document).

This is summarized as follows here:

(1) Traffic reduction

Can traffic levels be reduced, particularly heavy goods vehicles (HGVs)? Measures could include restricting the movements of HGVs from local roads, building by-passes to divert through-traffic, and environmental road closures to discourage through-traffic.

(2) Traffic calming

Can speed be reduced and driver behaviour modified? Here the emphasis must also be on enforcement (whether through increased use of speed cameras or other technologies). The concept of “traffic calming” should also be broadened to include physical measures to revise the perceived design speeds of roads, and other measures, such as the removal of one-way street systems. Multi-lane one-way street systems require cyclists to take detours rather than direct routes. They can also be daunting for cyclists since, if one intends to take a right hand turn at a junction, then one is required to weave across several lanes of (often fast-moving) traffic.

(3) Junction treatment and traffic management

This includes:

- urban traffic control systems designed to recognise cyclists and give them priority;
- contra-flow cycle lanes on one-way streets / making two-way streets for cyclists;
- exemptions to cyclists from certain banned turns and access restrictions;
- combined bus/cycle priority measures - and building upon the successful examples already developed in Irish cities (and learning from examples of QBC/cycle designs in which the route is not perceived to be cycle-friendly).
- on-street parking restrictions;
- advanced stop lines for cyclists at traffic signals - as has already been done in some cities around the country;
- by-passes for cyclists at traffic signals;
- signalising roundabouts, changing priorities at junctions so as to make cycle friendly;
- advanced transport telematics: designing new systems to benefit cyclists.

(4) Redistribution of the carriageway

Can the carriageway be redistributed? Such as by marking wide kerb lanes or shared bus/cycle lanes?

(5) Cycle lanes and cycle tracks

In addition, having considered and, where possible, implemented all of the above, what cycle tracks or cycle lanes (if any) are necessary in order to make a route cycling-friendly?

(6) Cycleways (public roads for the exclusive use of cyclists and pedestrians) What opportunities exist to create traffic-free routes linking, for example, residential areas to important destinations? These might include links between (previously unconnected) residential areas using parks, canal and river-side routes, e.g South Dublin County Council plan for cycling in parks. It can be seen from the above that in making provision for cyclists in the urban environment, it is often less about providing dedicated cycling facilities and more about wider traffic interventions that benefits all of the more vulnerable road users, not just cyclists

¹ SLÁN 2007 Survey of Lifestyle, Attitudes AND Nutrition in Ireland Main Report, DEPARTMENT OF HEALTH AND CHILDREN, 2008

² Kluper, G. (1997) Transport Planning in Groningen, Holland Bicycle Fixation. Available at: <http://www.bicyclefixation.com/groningen.htm> (Accessed: 27 January 2007).

³ Case Study No. 19 Traffic Calming, Auto-Restricted Zones and Other Traffic Management Techniques-Their Effects on Bicycling and Pedestrians Publication No. FHWA-PD-93-028 Federal Highway Administration 1994

⁴ Schepel, S. (2005) Woonerf Revisited: Delft as an example. Childstreet 2005 conference, Delft 2005. Available at: <http://www.urban.nl/childstreet2005/downloads/StevenSchepel-CF..pdf> (Accessed 21 January 2007).

GALWAY CYCLING CAMPAIGN

December 2016 Eurovelo 2 Galway – Moscow: Department “consultation” sets up more conflict with local communities.



Galway Cycling Campaign Feachtas Rothaíochta na Gaillimhe

with local communities. The consultation itself is part of a Strategic Environmental Impact assessment process and invites feedback on documents associated with that process.

On Friday 16 December just as the Christmas holidays were arriving, the Department of Transport, Tourism and Sport (DoTTS) announced a “**consultation**” on the Irish section of Eurovelo 2 (the **Capitals Route**) which starts in Galway and finishes in Moscow. Unfortunately this latest consultation demonstrated that the DoTTS had learned nothing from previous experience and were still set on confrontation

However the “vision statement” or terms of reference given for that process reveal no backing away from the extreme position taken by the Department in its conduct of the project so far.

Develop a segregated cycling and walking trail to international standards, extending from Dublin City to Galway which is of a scale that will allow Ireland to harness the potential of an identified growing tourism market for cycling. This route will form part of an interconnected National Cycle Network of high quality, traffic free, inter urban routes, which will establish Ireland as a quality international tourism destination for a broad range of associated recreational activities and pursuits.

Some of this appears to be verbal smokescreen such as the reference to “international standards”. The stated objectives within the document also refer to “best practice” along with other reference to “standards”. However no actual sources of practice or standards are actually provided. It is likely this is because there aren’t any credible sources that would support such a restricted approach. The problem lies with two words: “traffic free”. High quality international tourist cycling destinations do not rely exclusively on traffic-free routes. They use a range of options that build into a network of routes serving a range of user types. The term “traffic free” is not necessary to the creation of high-quality cycle routes. It is necessary however if the real goal of the project is to build 60km or more of completely new road through East Galway farmland. And at its essence this project does not seem to be about providing for cycling or walking but about finding excuses for roads engineers to construct a

new road. A side effect of this will be to significantly increase the cost to the state of providing a route.

The relevant standards in this case are the EuroVelo guidelines under which 70,000km of international cycling routes have been created. This list shows the percentage share of the infrastructure components making up the established **EuroVelo** routes:

- o Bicycle path/lane: 14%
- o Traffic-free asphalted road: 8%
- o Traffic-free non-asphalted road: 6%
- o Public low-traffic, asphalted road: 56%
- o Public non-asphalted road: 3%
- o Public high-traffic, asphalted road: 14%

On some individual routes the proportion of low-traffic roads is higher. In France 64% of EuroVelo 4 uses low-traffic roads. Some routes will have extensive traffic-free sections because they run along disused railways, canals or river banks. However the underlying philosophy is practical and uses existing features, or existing roads, wherever they are suitable. Tourist cycling routes should be kept well away from heavy traffic but they do not need to be completely traffic-free. Across Europe cycling tourists and family groups make extensive use of low-traffic roads as part of local and national cycle networks.

The EuroVelo guidance on **route development** states.

Route infrastructure components:

- Public roads: if the speed limit exceeds 30km/h, the road should not carry more than 2,000 motor vehicles per day, preferably under 500 vehicles. In exceptional circumstances public roads carrying up to 4,000 vehicle units per day may be used on a temporary basis. Shared lane marking, traffic reduction, calming measures and speed reduction can all contribute to improving safety. In urban areas and roads with high levels of motorised traffic, 30km/h speed limits are a good solution

In order for the DoTTS “traffic free” vision statement to be defensible on technical or standards grounds, the Department must be able demonstrate that there is not a single farm track, bog track, green road, country lane, or breen within the route corridor that is suitable to be repurposed as part of Eurovelo 2. No such assessment has been produced. Furthermore local residents report that in dealing with the project team the option of using existing features is being dismissed out of hand. Therefore it does not appear that the vision statement was guided by anyone with a good understanding of the practice of cycle route provision. Instead it would appear that a decision to build a new road through farm holdings

was taken first and justification is being sought in unnamed standards (and cyclists) after the fact.

We are talking about the state taking land off farmers in Galway on the basis of no apparent technical need, or route constraint or geographical constraint. That suggests a process that is about the exercise of power rather than about the provision of cycle routes. And this is where things get really, really strange. This is Galway and 2016 was the 100th anniversary the 1916 rising. East Galway was one of the few places outside Dublin to actively join the rising. The republican activity in Galway and in particular the east of the county was directly linked to agrarian agitation. As a **History Ireland** article on the rising in Galway states:

An agrarian secret society had existed in Galway since 1907 and was largely responsible for the waves of land agitation that swept across the county during the first two decades of the new century. However, this secret society was itself a revival of a secret society that had originated in the early 1880s, and probably had roots in the secret society tradition of the early nineteenth century.

There was a bitter land war in the county since the 1800s particularly around Loughrea and Craughwell. (Loughrea is one of the three locations where the documents for the current consultation are being made available for review.) A summary of a **recent book** captures the time.

In Ireland, during the Land War of 1879-1882, Galway was regarded as dangerously disturbed because of the large number of agrarian incidents reported. These included murders, the wounding of persons and animals, arson, widespread boycotting, and intimidation. In an attempt to restore public order, the authorities implemented repressive legislation in the form of two Coercion Acts in 1881 and 1882. The result was the arrest and internment without trial of 166 individuals, the majority in the Loughrea and Athenry police districts. In Loughrea, there was a sense that the town was under siege because of the intimidating presence of military and police.

So, despite all this history, on the anniversary of the 1916 rising, somebody in the DoTTS decided they were going to arrive in Galway and compulsorily purchase (CPO) farmers' land. This was clearly not being done as an unavoidable act for a public good where there was no alternative. Instead this was apparently a straightforward demonstration of power by those involved.

What could possibly go wrong?

The latest consultation period closes on Friday 27th January

<http://www.dttas.ie/sites/default/files/publications/public-transport/english/draft-dublin-galway-greenway-plan-public-consultation/20170112publicconsultationdraftdunlingalwaygreenway.pdf>

Sources

EuroVelo Strategy 2012 2020

<http://www.eurovelo.org/wp-content/uploads/2011/08/EuroVelo-Strategy-2012-2020.pdf>

EuroVelo Guidance on the Route Development Process

<http://www.eurovelo.org/wp-content/uploads/2011/08/Guidance-on-the-Route-Development-Process.pdf>

History Ireland: The Easter Rising in Galway

Published in 20th-century / Contemporary History, Features, Issue 2 (Mar/Apr 2006), Revolutionary Period 1912-23, Volume 14

The Easter Rising in Galway

As soon as the Great War broke out in August 1914, members of the Irish Republican Brotherhood (IRB), operating as a secret caucus within the Irish Volunteers, began to plan ... Continue reading



History Ireland



Loughrea, 'That Den of Infamy': The Land War in Co. Galway, 1879-82

by Pat Finnegan (Author)

Publisher: Four Courts Press (July 18, 2014)

<https://www.amazon.com/Loughrea-That-Den-Infamy-1879-82/dp/1846825121>

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**Submission on the DTTaS
Greenway Development
Strategy Consultation
14 July 2017**



Note: Following the format provided in the consultation documents we have filled in a question template. Additional comment on the consultation paper is provided first followed by the template.

Key points

The concept of a Greenway Development Strategy is misconceived and should be set aside. What is needed is a national strategy and program for the delivery of Objective 3 of the National Cycle Policy Framework (NCPF): Signed rural cycle networks for tourism and recreation. The current consultation should be set aside and a new consultation opened for the purpose of securing the prompt and timely delivery of Objective 3. The starting point for the new strategy should be the NCPF and the 2007 Fáilte Ireland Strategy for the Development of Irish Cycle Tourism. It should also incorporate the learnings of the “bottom up” approach that has delivered extensive cycle routes in Germany and the Netherlands. The 2010 National Cycle Network (NCN) Scoping study by the NRA (Now TII) should be set aside. Questions arise regarding the level of understanding of the authors. The manner in which the TII NCN proposals were compiled also shows an extremely poor attitude to civil society. This poor attitude from TII has carried through to the conduct of proposed NCN schemes and has resulted in unneeded controversy and divisiveness. Along with setting aside the TII document TII itself should be removed as the lead agency in coordinating rural cycling schemes.

Main body: Observations on the Greenway Consultation Document.

In Galway, the conduct of the Dublin Galway greenway proposals has been highly divisive and controversial. The net result has been to damage the brand of cycling and cycling tourism within significant sections of rural communities. In this context any attempt to widen the discussion and find a different process is welcome. This said there is a fundamental and fatal problem with the consultation paper and proposed Greenway Development Strategy. The issue can be found in first three sentences of the Minister’s foreword. He states with regards to the Western Greenway in Mayo “*We have seen that providing a safe, segregated space for cycling and walking will bring people in their droves to the countryside, to cycle and walk as a family, to avail of stunning views, fresh air and a sense of peace*”. This is correct however what he does not state is that the people are arriving in droves primarily by car and when they are finished they must go home by car.

You cannot have a functioning roads network that consists only of motorways. Likewise you cannot have a functioning cycle network that consists only of greenways. The implication, and underlying assumption, of the proposed Greenway Development Strategy is that for many cycling will remain an activity that is accessed by car. Greenways or “Cycleways” cannot deliver full benefits for Ireland unless they are used as one component in a comprehensive network of routes linking destinations. Greenways are only one form of cycling provision. Other components in such a network will include roads shared with motor traffic, roads with some form of segregation such as roadside cycle tracks and so on. Accordingly the concept of a Greenway Development Strategy is fundamentally flawed and misconceived and as a result should be set aside. What is needed is a national strategy and program for the delivery of Objective 3 of the National Cycle Policy Framework (NCPF): Signed rural cycle networks for tourism and recreation.

Policy Context

The consultation paper makes reference to various policy sources including

- People, Place and Policy – Growing Tourism to 2025
- National Physical Activity Plan 2016
- Realising our Rural Potential
- National Planning Framework – Ireland 2040 Our Plan
- National Mitigation Plan

It states that the proposed Greenway Development Strategy can support the objectives of these reports. This is true. However, a strategy focussed on greenways or cycleways can only do so in a limited, disjointed and fragmentary way. When they involve taking private lands, greenways can become a highly expensive and uneconomical form of provision.

Why invest in greenways?

This section contains reference to various benefits including

- Economic benefits
- Social and environmental benefits
- Health and well-being benefits
- Rural regeneration

All these benefits are not isolated to greenways or cycleways. These are all benefits of investing in, and facilitating, cycling and walking. The same benefits are often achievable without dedicated greenways or cycleways. This includes job creation, the consultation paper contains claims that capital investment in greenways will create jobs. The correct and responsible management of existing infrastructure could have the same job creation effect with minimal capital expenditure. One passage gives particular cause for concern.

“Of course, these figures are based on those taking cycling holidays. It is likely that tourists visiting Ireland will encompass cycling within their holiday rather than being the sole purpose of the holiday.”

This provides further confirmation that proposed Greenway Strategy is informed by an attitude that cycling is an activity that is accessed by car. The presence of this comment would appear to confirm a lack of ambition within the DTTaS and is further evidence of an apparent aim to evade or avoid delivery of the National Cycle Policy Framework. The extensive range of potential benefits acknowledged in the consultation paper confirms that an approach limited to a “Greenway Development Strategy” is fundamentally flawed and misconceived and as a result should be set aside. The best way for the widest number of citizens to obtain these benefits is a national strategy and program for the delivery of Objective 3 of the National Cycle Policy Framework (NCPF).

Common issues arising in the development of Greenways

See template response

What approach should be taken to the future development of greenways?

This section states that the development of an interconnected network of greenways could provide the basis of a cycle tourism project. This is true but it would be a very limited product and it could be expensive to create. An approach focused on greenways, at the expense of less involved methods, would also deprive many communities of the opportunity to develop local cycling routes, a cycling culture, and comprehensive cycling tourism products. This section also makes reference to the 2010 NRA (Now TII) National Cycling Network Scoping Study. As we deal with in our template response below, questions arise regarding the level of understanding of the authors. The manner in which the TII NCN proposals were compiled also shows an extremely poor attitude to civil society. This poor attitude from TII has carried through to the conduct of proposed NCN schemes and has resulted in unneeded controversy and divisiveness. Along with setting aside the TII document TII itself should be removed as the lead agency in coordinating rural cycling schemes.

The consultation document states that *“The Study was, however, referenced in the funding calls launched by the Department in 2012 and 2014. However, the on-road projects awarded funded under these funding calls have not proven to be as successful as those that were off-road or predominantly off-road, i.e. greenways.”* This requires further examination. As we show below, whether by accident or for some other reason the authors of the NRA document contrived to avoid best practice and to avoid key recommendations of the previous 2007 Failte Ireland Cycling Tourism Strategy. The NRA NCN document gives the impression of having been drafted by regional roads engineers for the purpose of justifying engineering works within Regional “R” and National “N” roads. The greenway consultation paper provides a list of schemes approved for funding under the National Cycle Network heading and sections of it make for depressing reading. In 2012 five of the schemes appear to have involved marking cycle lanes or “cycle tracks” within the hard shoulders of existing roads.

Hard shoulders are already acknowledged as a type of cycling facility in Ireland and elsewhere. The arterial nature of the traffic and traffic speeds on most roads with hard shoulders generally makes them unsuitable locations for child cyclists or less confident adults. However, they have an established value for more confident adult cyclists. Hard shoulders attract occasional use as a slow lane by motorised traffic. Some cyclists are uncomfortable with this; however it has the side-effect of sweeping any debris to the side of the road. Hard shoulders stay “usable” as a cycle facility because they are naturally “swept” from time to time. Hard shoulders on Irish national routes have provided a huge rural cycling infrastructure. A 1975 An Foras Forbartha report on cycling included this finding “Hard shoulders on national primary routes reduce cyclist accident rates by as much as 50%”. Hard shoulders are a practical rather than ideal solution – even so the extra space improves safety and comfort, and roads with hard shoulder are often arguably safer, more comfortable and more attractive cycling environments than the main roads in the urban centres they connect. “Changing the colour of the paint” by marking cycle lanes in hard shoulders does nothing to address the nature of the traffic using the roads. It does nothing to increase the overall length of cycle network of that character. Worse it may create a false expectation of safety and attract novice cyclists to a route that is fundamentally unsuitable to their needs. It may also have the side effect of reducing the cleaning effect that was keeping them usable for cyclists. All these issues were established prior to 2012 when cycling interests had already raised serious reservations about marking cycle lanes in hard shoulders.

In summary, for informed cyclists looking at the situation, marking cycle lanes in hard shoulders is at best a profoundly misguided and at worst a straightforwardly cynical use of public money. It has the appearance of a scheme concocted for the purpose of consuming state cycling budgets for no net benefit.

If these schemes then failed to provide a more generally suitable cycling environment this is not an argument in favour of greenways, it is an argument for improved governance over the manner in which the DTTaS spends tax payer’s money.

Eurovelo

With regards to Eurovelo type routes the consultation paper makes reference to standards that it claims the European Cyclists Federation sets for different types of cyclists and different types of routes. No reference or source is given. We have reviewed the 2014 Eurovelo Certification Standard Manual and are unable to map the content of this document to the terminology used in the DTTaS paper. The consultation document continues with this passage: “The standards for experienced cyclists and even occasional cyclists can generally be achieved on roads identified on the routes with low traffic volumes. However, it is difficult to achieve the higher standards required for inexperienced cyclists and families on on-road routes.” It does not appear that this passage is derived directly from any Eurovelo guidelines. Instead it seems to be an interpretation inserted by the authors of DTTaS consultation document.

It remains a fact that other countries, Germany being one example, have created extensive family-friendly cycle routes that are shared with some level of motor traffic. The key point is that measures are taken to restrict unsuitable traffic from these routes and low speed limits are applied. Examples are routes restricted to local motor-traffic or residents cars only and routes restricted to agricultural or other vehicles accessing land. The current Minister

already has powers to deliver similar measures for local communities. Under the roads acts the Minister already has the power to designate particular roads for particular purposes. Alternatively under the same acts the Minister has the power to declare particular roads to be protected and hence restricted to specified classes of vehicle. Finally under the Road Traffic Acts the Minister has the power to close certain roads to certain types of vehicle or to make regulations “(d) prohibiting or restricting traffic or specified traffic from using a specified road or specified parts of the road (including footways or parts of the road reserved for pedal cycles);”

It does not appear that there is any inherent difficulty involved in applying similar treatments in Ireland. Given that this approach would be virtually cost free in terms of capital expenditure it seems difficult to explain the apparently overwhelming focus on greenways coming from the DTTaS.

Template Answers Follow Below

Why invest in Greenways

Questions for consideration

Do you agree that the State should invest in greenways?

Response: By “greenway” we assume the authors are referring to what are termed cycleways in Irish law (distinct separate public roads reserved for cyclists and pedestrians). The answer is yes the state should invest in cycleways as one component of a balanced program of provision. With regret this is a somewhat strange question. We are not aware of any serious contributor who objects to cycleways in themselves. What has caused controversy and opposition has been the manner in which cycleway proposals have been conducted and the refusal of state actors to accept any other form of cycle route provision on particular corridors.

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

Response: The benefits of investing in cycling do not require restating here. Cycleways cannot deliver full benefits for Ireland unless they are used as one component in a comprehensive network of routes linking destinations. Cycleways are only one form of cycling provision. You cannot have a functioning roads network that consists only of motorways. Likewise you cannot have a functioning cycle network that consists only of cycleways. Other components in such a network will include roads shared with motor traffic, roads with some form of segregation such as roadside cycle tracks and so on.

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

Response: The benefits of investing in cycling do not require restating here

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

Response: The proposed greenways strategy is misconceived and should be set aside. The idea of cycleways or greenways being a separate program isolated from the delivery of Objective 3 of the NCPF should be abandoned.

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?

Response: Yes. The most glaring examples of this are the service roads constructed parallel to the new motorways. These service roads were constructed mainly to facilitate farmers whose properties were severed by the motorway. In most cases they do not have any through motorised traffic and only provide access for local landowners. They are often well displaced laterally from the motorway and

separated by fencing, embankments and vegetation. They have already been constructed at state expense and, if connected, they would provide ideal opportunities for walking and cycling for local communities. Cycling beside a motorway is unlikely to be the option of first choice for tourists but tourists should not be the first consideration in delivering Objective 3 of the NCPF. The first consideration should be “what opportunities are there do something for the local community?”.

However, TII have demonstrably failed to use this opportunity. The manner in which TII have conducted their motorway projects undermines their credibility as an agency that can claim to have an interest in cycling. In Galway, there are long sections of service road available beside the M6 but no effort was made to connect them as a resource for cycling or walking. This failure by TII reinforces the need to remove TII as the lead agency in delivering long distance cycling routes.

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?

Response: The way this question is phrased indicates an incorrect attitude. Successful recreational networks are built from the bottom up. If there is a feature in a local area that is adaptable as a cycleway or cycle route then it is likely that there have already been community groups working for years to develop it often against the hostility and opposition of state actors. If the proposer of a project is unable to show a long history of community involvement and is not able to show that consultation and community discussion has already taken place then that project should be rejected by the DTTaS.

Overall this question implies an incorrect attitude to project delivery and reinforces the view that the whole concept of a “greenway delivery strategy” is misconceived and should be set aside.

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

Response: Again the way this question is phrased indicates an incorrect attitude. As already stated, if there is a feature in a local area that is adaptable as a cycleway then it is likely that there have already been community groups working for years to develop it often against the hostility and opposition of state actors. Rather than conceiving projects in isolation and then dropping them out the sky, the state should start by supporting local communities with the tools they need to deliver local projects. Give communities the necessary support and the project ideas will follow.

Is consultation as part of any statutory requirements sufficient?

Response: No what usually happens is not “consultation” but a “consultation process”. If the DTTaS is serious about delivering projects then a good starting point would be internal training on what constitutes meaningful consultation. This could be followed by a defined code of practice.

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?

Response: Again the focus on cycleways is too narrow. Clearly state lands are the option of first choice in the delivery of Objective 3 of the NCPF. In this regard the roads network is the most important example of state land to be considered. The roads network clearly provides the most ready opportunities. Other countries have made the decision that many roads have a primary function other than moving motor traffic at speed. Other countries have made the decision to manage minor rural roads and tracks in a way that permits only appropriate motorised traffic and preserves the road as an amenity for walking and cycling.

Ireland must be mature enough to do the same thing.

With regards to traffic-free cycleways. There are various lands in state ownership that provide corridors suitable to be adapted as traffic free cycleways. Examples are various disused railways, Bord na mona lands, Coillte lands, motorway service corridors, canals and so on. There should be a presumption that these corridors will automatically be used to provide cycle ways unless other considerations apply. So in the west the disused railway line running north from Athenry should be converted without further ado. We know of no credible objections to converting the closed railway. In the east, the concerns around the Barrow path are valid and should be taken on board.

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

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

Response: These are essentially the same question. The answer is yes. There is no point pursuing the construction of cycleways simply because land is available. Some terrain may not be suitable or there may be other considerations such as apply such

as in the case of the River Barrow corridor. In essence, the question only arises because the whole concept of a “greenway delivery strategy” is misconceived. If the issue was being discussed in the context of a strategy for delivery of Objective 3 of the NCPF then the priorities would be clear.

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?

Response: This sounds like some kind of marketing speak. Cycleways cannot deliver full benefits for Ireland unless they are used as one component in a comprehensive network of routes linking destinations. Cycleways are only one form of cycling provision. You cannot have a functioning roads network that consists only of motorways. Likewise you cannot have a functioning cycle network that consists only of cycleways. Other components in such a network will include roads shared with motor traffic, roads with some form of segregation such as roadside cycle tracks and so on.

Land Access Arrangements

Questions for consideration

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

Response: Yes.

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?

Response: Yes. We cannot imagine a successful cycling facility that is imposed by coercion on the people whose land it passes through. Just because somebody in a state agency has the power to use Compulsory Purchase Order (CPO) it does not follow that this is a good idea or that it will actually deliver a workable solution. If state actors choose to use coercion and raw power in pursuit of some theoretical NCN project then this is likely to backfire. The people who are most likely to receive any backlash are not the civil servants indulging their powers but the unsuspecting cycling visitors to a hostile location.

It is precisely this coercive CPO-led approach by the TII that has backfired in Galway and which underlines the need remove TII as the lead agency rural cycle routes.

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

Response: Projects involving privately owned land.

Are there projects that it would be unsuitable for?

Response: Yes any project where the full range of alternatives had not been considered and where comprehensive consultation, negotiation and arbitration had not already taken place.

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?

Response: Yes. Compulsory Purchase Order (CPO) might be needed to provide a final link in certain types of route. However we restate the point that dedicated cycleways are only one form of provision. Every effort should be made to explore all available options first. Where finally CPO is considered it should come after consultation, negotiation and arbitration. CPO should be with the agreement of the land owners. CPO by coercion places the users of a cycle facility in conflict with landowners.

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

Response: This question assumes that CPO would be considered as the option of first choice and that the next decision is who to consult. This is a bizarre and destructive attitude in our view. It is this kind of thinking that illustrates why some projects have created trenchant opposition. If this is indicative of the attitudes informing the proposed greenway development strategy then this further evidence that it is misconceived and should be set aside.

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

Questions for consideration

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

Response: The 2010 NCN Scoping Study should be set aside. Instead the 2007 Failte Ireland document should be taken as a starting point. There are curious errors and omissions in the 2010 NCN document. In our view those who drafted the 2010 NCN proposals also displayed a poor attitude to stakeholders from civil society.

In terms of errors, in the 2010 NCN document the authors make confusing use of terminology. In Ireland, the terms “cycleway” and “road” are very clearly stated and defined under the Roads Act. The full definitions are provided in an appendix to this document but to put it simply in Irish law a “cycleway” is a stand-alone road dedicated to cyclists or cyclists and walkers and from which other traffic is excluded. In the 2010 NCN document, the term cycleway is used interchangeably to describe cycle facilities within other main roads and placing cyclists in close physical proximity to high speed traffic. The study authors then use the term “cycle trail” to indicate what are termed cycleways in Irish law. It appears that at best the authors (from the National Roads Authority) did not understand the legal frameworks governing Irish roads. Whatever the reason, the report uses terminology in a manner that might tend to confuse readers about what was being proposed.

In terms of omissions, the 2007 Failte Ireland Cycling Strategy is explicitly mentioned in the term of reference for 2010 NCN document. The Failte Ireland document included the use of minor low-traffic country roads and lanes as a fundamental part of their proposed cycle network. The 2010 NCN document makes no mention of this and does not include this option in their defined list of route types. In addition, the Failte Ireland document states explicitly that busy R and N roads are to be avoided “Generally due to high traffic levels and high speeds we wish to avoid cycling on N or R-roads”. In the 2010 NCN document three of the four route types specified show cyclists placed in close proximity to motor traffic on R or N type roads including an interurban dual-carriageway. Rather than being a way forward, the omissions from the 2010 NCN document invite speculation that it was intended to avoid and undermine best practice in the provision of rural cycling routes. Overall the 2010 NCN document appears to have been drafted by a group of regional roads engineers for the purpose of justifying engineering works involving R and N roads.

Finally there is the attitude to civil society. The 2010 NCN document lists 15 stakeholders. It also states that there was detailed engagement with those stakeholders. However the list comprises exclusively state actors. There are no representatives of cycling interests, rural development interests, farming interests, or community structures such as community fora. The 2010 NCN document was apparently compiled by a group that did not consider the community as stakeholders in an NCN project. In our view this displays a poor attitude. From our perspective it is difficult to see how a program drafted and proposed with such an attitude could hope to be successful.

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?

Response: Yes. We repeat our previous observations. Cycleways cannot deliver full benefits for Ireland unless they are used as one component in a comprehensive network of routes linking destinations. Cycleways are only one form of cycling provision. You cannot have a functioning roads network that consists only of motorways. Likewise you cannot have a functioning cycle network that consists only of cycleways. Other components in such a network will include roads shared with motor traffic, roads with some form of segregation such as roadside cycle tracks and so on.

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

Response: We repeat our previous observation. Cycleways cannot deliver full benefits for Ireland unless they are used as one component in a comprehensive network of routes linking destinations. Cycleways are only one form of cycling provision. You cannot have a functioning roads network that consists only of motorways. Likewise you cannot have a functioning cycle network that consists only of cycleways. Other components in such a network will include roads shared with motor traffic, roads with some form of segregation such as roadside cycle tracks and so on.

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?

Response: Yes. To restate, what is needed is a strategy to deliver Objective 3 of the NCPF. A study of the Eurovelo model and of the way it arose in Germany, the Netherlands and elsewhere shows that Eurovelo is an excellent model for the delivery of Objective 3 of the NCPF. Cycleways or “greenways” will also be part of that model along with other forms of provision.

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?

Response: This question misunderstands the nature of Eurovelo. Eurovelo was not dropped out of the sky from above. What happened was that the state in Germany, the Netherlands and elsewhere gave local authorities the tools needed to create a network of local cycle routes for local communities. As these local routes grew they connected with each other to create a larger network. Eurovelo is a list of potential long distance routes obtained by drawing a map connecting these established local networks together.

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?

Response: The proposed greenways strategy is misconceived and should be set aside. The idea of cycleways or greenways being a separate program isolated from the delivery of Objective 3 of the NCPF should be abandoned.

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

Response: The proposed greenways strategy is misconceived and should be set aside. The idea of cycleways or greenways being a separate program isolated from the delivery of Objective 3 of the NCPF should be abandoned.

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?

Response: This is the same as the question above regarding state lands. With regards to traffic-free cycleways. There are various lands in state ownership that provide corridors suitable to be adapted as traffic free cycleways. Examples are various disused railways, HSE lands, Boards of works lands, Coillte lands, motorway service corridors, canals and so on. There should be a presumption that these corridors will automatically be used to provide cycle ways unless other considerations apply. However the provision of recreational routes is not an alternative to providing cycling friendly road conditions across the wider urban roads network.

Greenway users, standards and accessibility

Questions for consideration

What type of surface should be used on Greenways?

Response: A cycleway or “greenway” is a road, they should be surfaced as roads using smooth rolled tarmac unless there are other considerations.

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

Response: A cycleway or “greenway” is a road, they should be surfaced as roads using smooth rolled tarmac unless there are other considerations.

Should access be controlled or open?

Response: Access should be physically open to the widest range of users including wheel chair users, cargo bikes and bike trailers such as for small children. Kissing gates etc should have no place on cycling routes. There should be a national program to remove kissing gates.

Appendix Legal Definitions

ROADS ACT, 1993 Section 68: Cycleways

68.—(1) In this section "cycleway" means a public road or proposed public road reserved for the exclusive use of pedal cyclists or pedal cyclists and pedestrians.

(2) (a) A road authority may construct (or otherwise provide) and maintain a cycleway.

(b) Where a road authority constructs or otherwise provides a cycleway it shall by order declare either—

(i) that the cycleway is for the exclusive use of pedal cyclists, or

(ii) that the cycleway is for the exclusive use of pedal cyclists and pedestrians.

(c) Any person who uses a cycleway in contravention of an order under paragraph (b) shall be guilty of an offence.

ROADS ACT, 1993 Interpretation

“road” includes—

(a) any street, lane, footpath, square, court, alley or passage,

(b) any bridge, viaduct, underpass, subway, tunnel, overpass, overbridge, flyover, carriageway (whether single or multiple), pavement or footway,

(c) any weighbridge or other facility for the weighing or inspection of vehicles, toll plaza or other facility for the collection of tolls, service area, emergency telephone, first aid post, culvert, arch, gulley, railing, fence, wall, barrier, guardrail, margin, kerb, lay-by, hard shoulder, island, pedestrian refuge, median, central reserve, channelliser, roundabout, gantry, pole, ramp, bollard, pipe, wire, cable, sign, signal or lighting forming part of the road, and

(d) any other structure or thing forming part of the road and—

(i) necessary for the safety, convenience or amenity of road users or for the construction, maintenance, operation or management of the road or for the protection of the environment, or

(ii) prescribed by the Minister;

Irish Cycling Campaign

Comments on Groceries Order

July 2005

FAO: Micheál Martin, T.D. - Minister for Enterprise Trade and Employment
Martin Cullen, T.D. - Minister for Transport
Ivor Callely T.D., - Minister of State at the Department of Transport
Dick Roche, T.D. - Minister for the Environment, Heritage and Local Government
Mary Harney TD - Tánaiste and Minister for Health and Children

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Comments on proposed removal of the Groceries order

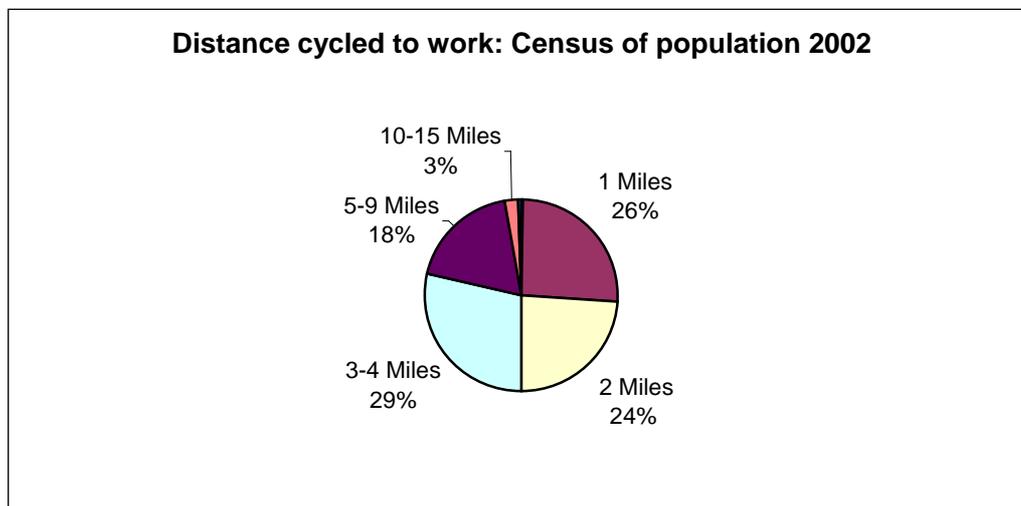
Primary recommendations.

The groceries order is a key measure in support of Government policies to restrict growth in private car traffic and encourage more sustainable modes of transport. In addition, the groceries order must also be seen as a key measure in Government initiatives to tackle the obesity crisis and associated morbidity related to lack of exercise. The groceries order must be retained and strengthened by other measures such as taxes on vehicle movements at out-of-town retail developments and more stringent caps on retail development size.

Ireland's cycling culture

Ireland has historically had a robust and healthy cycling culture. In comparatively recent times Irish cycling participation has shown the ability to demonstrate significant growth. From 1980 - 1985 the Irish National Census recorded a 27% increase in the use of bicycles for trips to work and education. In numerical terms, cycle use by commuters grew by just under 30%. Historically, cycling for shopping trips has also been a undeniable feature of Irish life. The country housewife/townswoman going for her "messages" on her black bike was part of the typical traffic mix in most Irish towns. Cycling participation has fallen off considerably in recent times. However, various Government departments have now stated an interest in promoting cycling both as an alternative to mass car use and as a readily available source of exercise to combat the obesity/heart disease epidemic.

Reasonable cycling distances



It is generally accepted that cycling is only considered a viable form of transport for short trips: 4 miles or less. According to the census of population 2002, 79% of workers who cycled travelled distances of 4 miles or less. The census does not record use of bicycles for shopping trips. However, it is reasonable to assume that similar patterns will apply for people who wish to use bicycles for shopping trips. Thus if significant use of bicycles for shopping trips is to be achieved, sufficient retail services must be maintained within reasonable cycling distances of residential areas. It is self-evident that people cannot be asked to cycle to shops that are no longer there. Exactly the same arguments apply to the promotion of walking or "pedestrian

modes" as transport. In the latter case the maximum realistic access distances are even shorter.

Denmark

Denmark is noted for high levels of cycling. It is clear this is intrinsically related to Danish policies that favour access to retail services by non-motorised modes. The Danish document on cycle promotion: "Collection of Cycle concepts", makes specific reference to the issue of shop locations in its discussions on cycle promotion policy (Danish Roads Directorate 2001). The document explicitly states "The bicycle is often used to shopping centres in the town centre" while "The bicycle is rarely used to shopping centres on the outskirts of the town". In this regard this document specifically cites Danish planning policies that make it difficult to obtain permission to establish new food outlets greater than 3,000 square metres in area and non-food outlets greater than 1,000 square metres. The Danish 1997 Planning Act requires that planning shall encourage a diverse mix of retail shops in small and medium-sized towns and in individual districts of large cities and ensure that retail trade uses will be placed in locations to which people have good access especially by walking, bicycling and public transport. The Danes specifically state that their planning law and system help to maintain a decentralised structure and to stabilise the number of retail outlets. These retail policies are clearly an integral aspect of their policies aimed at restricting growth in car use and encouraging non-motorised modes. This approach not restricted to planning guidelines and is also supported by a ban on below cost selling (RGDATA 2005) .

The Netherlands

The Netherlands is noted for high levels of cycling. It is clear that as in Denmark, this is intrinsically related to Dutch policies that favour access to retail services by non-motorised modes. From the mid 1970s the Dutch have had policies in place to severely restrict the growth of large out of town retail developments (ITDP 2002). In 1990 the Dutch adopted the "ABC" guidelines, these specifically limited developments that are major attractants to locations that are easily accessible by non-car users. These retail policies are clearly an integral aspect of Dutch policies aimed at restricting growth in car use and encouraging non-motorised modes. This approach not restricted to planning guidelines and is also supported by a ban on below cost selling (RGDATA 2005).

Germany

Germany has had federal planning regulations in place to restrict retail uses to designated areas since the 1960s. In addition, since the 1970s federal regulations have been in place specifying that developments above a certain size (1,200m²) be assessed regarding potential adverse impacts. These federal regulations are further strengthened by regionally adopted regulations. This includes regulations specifying that new retail centres be limited to selling products not readily provided by shops at inner city/town centre locations (ITDP 2002). This approach not restricted to planning guidelines and is also supported by a ban on below cost selling (RGDATA 2005).

The alternative to protecting our existing towns and cities

The United Kingdom

From the 1980s to mid 1990s the UK operated a system of *laissez faire* with regard to retail policy. Indeed it might be argued that the “great car economy” philosophy of the Thatcher government directly favoured the growth of out-of-town retail centres at the expense of established retail services in British towns and cities. The UK Town and Country Planning Association cites research by the New Economics Foundation that throws stark light on what occurred and is continuing to occur to this day (TCPA 2005).

- *General stores are closing at the rate of one per day.*
- *Between 1997-2002, specialised stores, including butchers, bakers, fishmongers, and newsagents, closed at the rate of 50 per week.*
- *Nearly 30,000 independent food, drink, and tobacco retailers, or over 40 per cent, have been lost over the past decade.*

It is clear that in such a retail/planning policy environment access to a private motor-car becomes a necessary prerequisite for access to basic services. It is also clear that unnecessary private car use is being imposed on the car-owning population regardless of personal choice. It is axiomatic that isolated out of town retail centres are difficult to serve with unsubsidised public transport. The transport provider cannot count on fares from a wide mix of passenger types and cannot readily combine the service with one serving places of work and education. The implications for the vulnerable in affected communities are negative. In addition the imposition of unnecessary private-car use has direct negative congestion impacts and impacts negatively on the free movement of other goods and services.

Conclusion

The retention of a broad mix of retail services in our town and villages centres is a key objective if alternatives to mass car use such as walking and cycling are to be promoted. It is clear that measures to reduce the impact of large multiples and restrict the growth of out-of-town centre shopping developments are an essential part of any policy to provide alternatives to mass car use. Similar considerations apply to the promotion of exercise as a means of tackling the established obesity/heart disease crisis. Clearly this suggests that the groceries order must be retained as a major plank in such policies.

Planning measures such as caps on retail development size must be strengthened and their scope expanded. It is also arguable that large retail developments located away from existing town centres are being given an unfair government subsidy by being allowed direct access to our arterial roads network. Granting retailers this “subsidy” directly undermines the initial public investment in infrastructure. Road capacity provided at considerable public expense is subsequently taken up by shopping trips that are best catered for elsewhere. This cost to society can be recovered in part by measures such as taxing out of town centre retail developments per vehicle-movement generated. The owners can recover these costs by charging for parking. This will also help level a playing field where customers shopping at town centre/inner city locations must generally pay for parking while those using shopping centres on the periphery do not.

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Galway Cycling Campaign
Feachtas Rothaíochta na Gaillimhe

Shane Foran M.Sc.

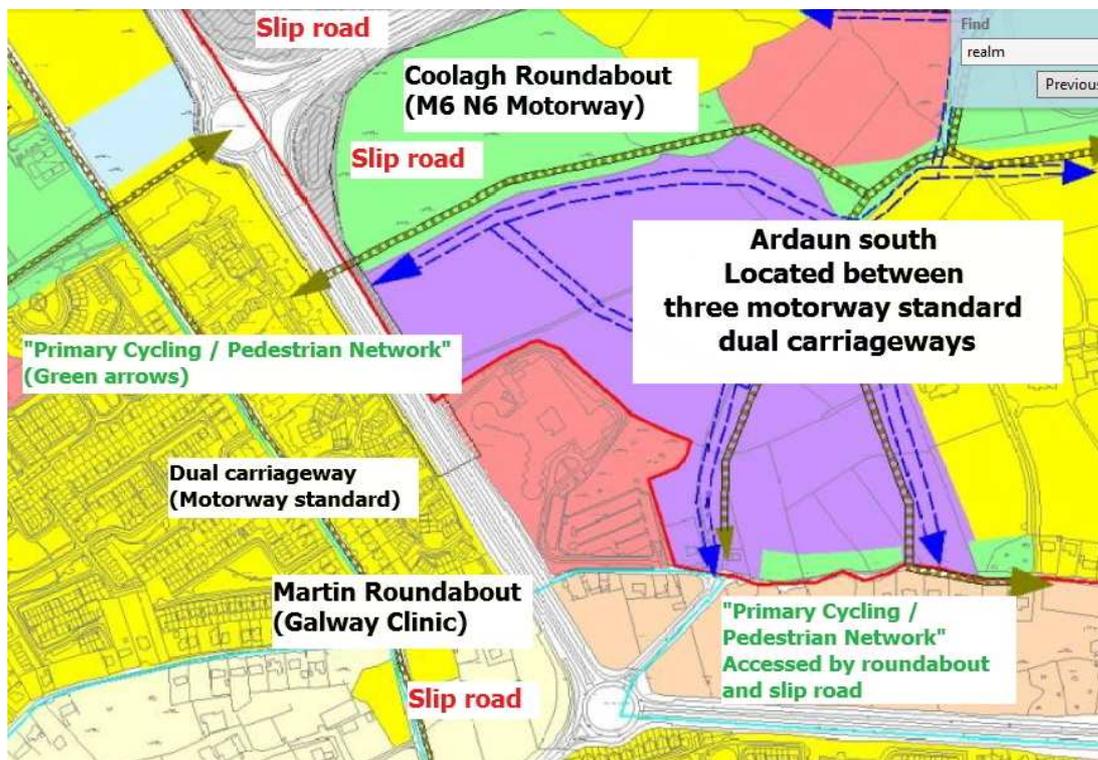


19 October 2017

FAO:
Senior Planner
Planning Department
Galway City Council

Draft Ardaun LAP Submission/Observation

On behalf of the committee I wish to make an observation on the above. The nature of the roads surrounding the site is incompatible with the relevant guidance such as the *National Cycle Policy Framework*, the *Design Manual for Urban Roads and Streets* and the *NTA Permeability Best Practice Guide*. As such in its current form this location at Ardaun is not suitable for residential development, unless significant remedial action is taken, the local area plan should be set aside in favour of finding a more suitable location.



Extract from *Draft Ardaun Local Area Plan* labelled to show the nature of surrounding roads and proposed cycling/pedestrian links.

Specific observations on the current plan.

- The roads around the site remain of an unsuitable character for residential development
- It seems the Martin Roundabout at the Galway Clinic is to be the main means of access to the site for cyclists and pedestrians. There is only reference in the draft plan to "investigating" removing the roundabout.
- There are no concrete proposals for dealing with the severance of the site from Doughiska or Roscam by the dual carriageways.
- There is mention of a "public transport" bridge into the site from Doughiska. This is not stated as a prerequisite for the development. It seems to be mentioned as feature that might be delivered by the Galway Transport Strategy but is not a deliverable for the Ardaun Local area plan.
- The plans also show a "Primary Cycling / Pedestrian Network" joining the high speed Coolagh roundabout at the end of the M6/N6 at ground level. This "Primary Cycling / Pedestrian Network" then crosses into Ardaun by crossing the slip road onto the southbound dual carriageway.
- There is to be a foot/cycle bridge over the motorway linking the southern and northern pieces of land.
- Cyclist and pedestrian access to the northern piece of Ardaun is to be via the junction at Dunnes in Briar Hill.

The use of roundabouts and slip road on the adjacent roads is wholly incompatible with residential development.

Roundabouts

Since the 1980s Irish guidance has raised serious reservation about using roundabouts at locations where cyclists are expected due to the high collision risk. The 2009 National Cycle Policy Framework defines roundabouts as a matter needing remedial action if more cycling is to be encouraged.

R.286 Design and Use of Roundabouts in Ireland, An Foras Forbatha, 1987.

In this document the most relevant study is one that takes an in depth look at traffic accidents on the roundabouts on the Swords bypass in Dublin. A particular finding was that the accident rate for the two-wheelers was five (x5) times higher than they were expecting.

Section 4 General Observations on Specific By-Pass Accident Groupings

Page 95:

" (d) One of the worrying features of the safety performance of the Swords By-pass is the high incidence of two-wheelers in personal injury accidents (over 50% of all injury accidents as shown in Table 5). Significantly this trend reflects that of the T.R.R.L. report where accident involvement rates [...] of two-wheeler riders were about 10-15 times those of car occupants. Comparative Irish figures of fatal and injury accidents for

pedal cycles and motorcycles outside build up areas are 4.6% and 6.8% respectfully. Thus the combined rate is approximately 20% of that for the By-pass accidents"

Section 5 Conclusions

Page 101

"4) The high incidence of two wheeler accidents on the Swords bypass allied with similar findings in the major accident study carried out by the TRRL on roundabouts shows that roundabouts on high speed roads do not provide a safe environment for two wheelers and consequently give serious reservation as to their use where high numbers of this road user class is expected".

National Cycle Policy Framework 2009

Page 20

2.6 Remedial Measures

We will carry out remedial measures on existing cyclist-unfriendly urban roads with a special focus on roundabouts, multi-lane oneway streets and road narrowing schemes. Without addressing the difficulties posed by high capacity, high speed roundabouts in urban locations – and particularly those between residential areas and schools - it will be very difficult to encourage more of the public to cycle.

The Galway City Development Plan 2011 to 2017 stated (Page 33)

In order to increase cycle usage, new development will be required to maximise permeability and connectivity for cyclists, to create direct safe links to road networks and greenways and where appropriate, to provide cycle parking facilities. The Council recognises the difficulties posed by roundabouts for cyclists and pedestrians and is committed to addressing this issue by taking whatever appropriate steps as are necessary.

The Design manual for Urban Roads and Streets states (Page 105)

Large roundabouts are generally not appropriate in urban areas. They require a greater land take and are difficult for pedestrians and cyclists to navigate, particularly where controlled crossings/cycle facilities are not provided, and as such, vehicles have continuous right of way. The use of large roundabouts (i.e. those with radii greater than 7.5m) should be restricted to areas with lower levels of pedestrian activity. Where large roundabouts currently exist, road authorities are encouraged, as part of any major upgrade works, to replace them with signalised junctions or retrofit them so that are more compact and/or pedestrian and cycle friendly, as is appropriate.

Slip roads

Slip-Roads/Acceleration Lanes and Merges are found on the roads accessing this site. In particular cyclists or pedestrians trying to get to the Martin roundabout from the city side must cross a slip road first. Anyone travelling towards Ardaun from the north must cross two slip-

roads associated with the Coolagh roundabout and the N6/M6 motorway. For cyclists collisions at these locations are known to carry significantly increased risk of fatality and serious injury. In the UK, recorded accidents at slip-roads have a fatality rate that is 6 times higher than that on the network as a whole. The overall accident rate per cycle movement is also thought to be significantly higher. On dual carriageways it has been estimated that replacing a roundabout or signalised intersections with a grade separated slip-road results respectively in a fourfold to tenfold increase in the injury accident rate for cyclists¹. In both the UK and Ireland general road design guidance restricts the use of acceleration lanes and merge tapers to rural dual carriageways or to roads of that character. The presence of slip roads at this location is incompatible with using it for residential development.

With regards to slip roads the Design Manual for Urban Roads and Streets states (page 104)

Omit left turn slips, which generally provide little extra effective vehicular capacity but are highly disruptive for pedestrians and cyclists. Where demand warrants, they may be replaced with left turning lanes with tighter corner radii (see Figure 4.59).

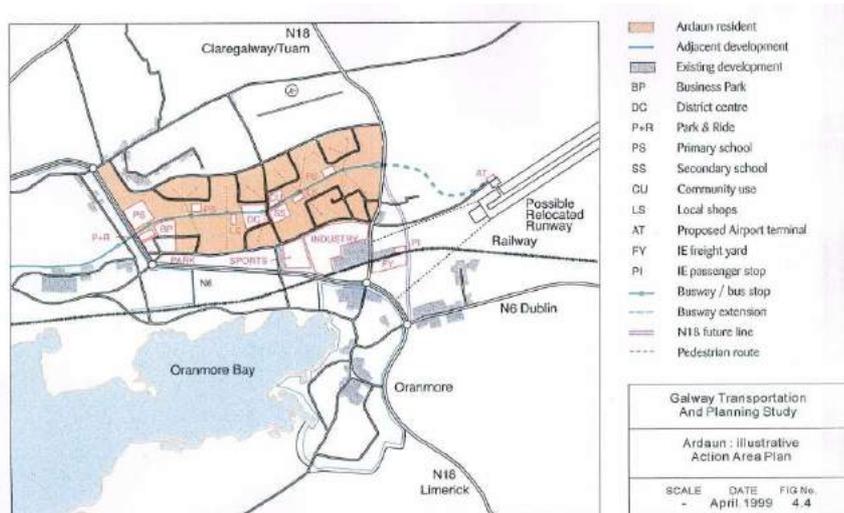
Overall analysis regarding roads serving this site.

Overall our analysis is that this Local Area Plan is unsustainable and represents more “planned car dependency” for Galway that will put more unnecessary car journeys into a location near Parkmore already noted for traffic problems. The claims in the local area plan regarding “sustainability”, “urban villages” or “public realm” are made unsupportable by the nature of the roads serving the site. In particular this location is demonstrably hostile to children and to anyone who does not have ready access to a private motor car.

Discussion of the Ardaun Concept

The Ardaun Corridor concept was originally proposed in the 1999 *Galway Land Use and Transportation Study* as a new suburb on the east of the city. It was to be located on a corridor running east-west between the Monivea Road on the north and the old N6 dual carriageway to Oranmore on the south. It was to start on the west at Doughishka and extend as far east as the N18 where it runs north to Claregalway. The concept was that the new community was to be built on sustainable principles around a central bus corridor on an east-west alignment and equally accessible from both the northern and southern districts. This corridor was then to link with the wider city.

¹ Pedal cyclists at dual carriage-way slip roads, M.C. Williams and R.E. Layfield, *Traffic Engineering and Control*, pp. 597-600, November, 1987.

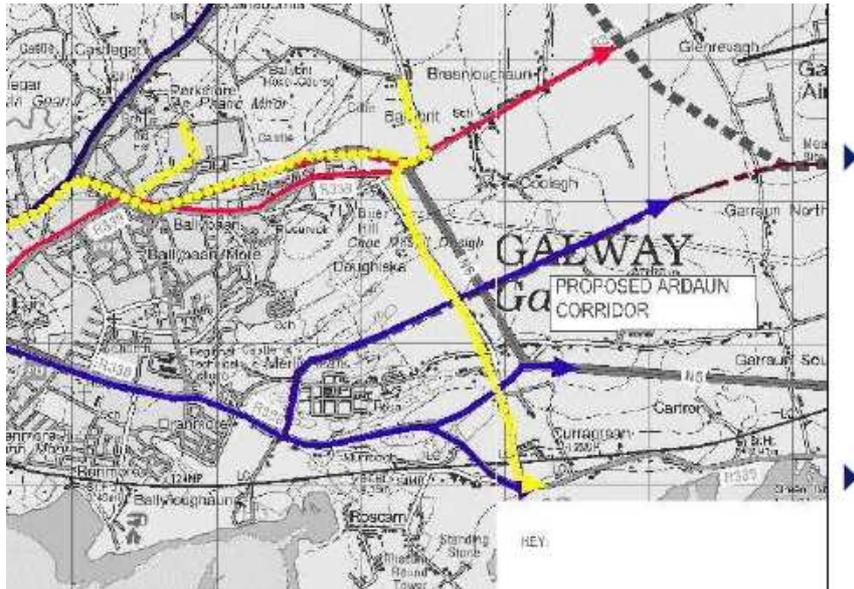


Extract from *Galway Transportation and Planning Study: Recommended Strategy*, September 1999. The proposed Ardaun suburb is the shaded area

The concept behind the proposed Ardaun Corridor was restated in the *Galway City Development Plan 2005 – 2011*. On Page 13 Chapter 1. 5 “GTPS – Transportation Strategy” the plan states;

“As a significant amount of the forecast growth will take place in the Ardaun Corridor there will be opportunities for a specific designated public transport system—a bus network. The provision of such a service will be required to be integrated fully into the design and location of employment opportunities and services. It is anticipated that every household within the Ardaun Corridor would be no more than 300m from a bus stop and will have good quality links for pedestrians and cyclists. Strategic corridor reservations have been included in the plan to accommodate the link of this bus system into the city centre.”

The 2006 *Galway Strategic Bus Study* by Booz Allen Hamilton Consultants restates this concept. Maps given in the *Galway Strategic Bus Study* again show Ardaun constructed around a central corridor on an east-west axis accessible from north and south. The bus study also states that the bus corridors and bus-only roads would be open to cyclists, who are therefore also “design users”. The bus study also argued against the use of roundabouts.



Extract from *Galway Strategic Bus Study* showing alignment of proposed bus corridor through lands at Ardaun.

This alignment had apparently been reserved in the 2005-2011 development plan for a corridor based on sustainable transport modes. Despite this, between 2007 and 2009 the western terminus of the M6 motorway was constructed along this exact alignment. The new road was not built as a road of an urban character. It was not designed to be capable of being integrated into the proposed new community and be capable of being adapted to the sustainable transport corridor concept. Instead, the new road was constructed as what is in effect a limited access motorway on a high embankment and with the road itself isolated from the surroundings behind earth banks and other structures. The nature of the junctions with the roundabouts and the associated slip roads at Coolagh and the Galway Clinic is wholly incompatible with an urban environment where there will be a mix of road users such as pedestrians, cyclists, public transport etc. Clearly those who designed and authorised this road design either ignored the proposed use of the lands at Ardaun or else simply did not believe that the development would ever happen. Later documents discussing Ardaun now show a revised bus/cycle corridor doing a dog-leg diversion along the dual carriageway and serving only the south section of the lands. As an observation, it would seem based on the currently available evidence that those who constructed the N6/M6 and associated junctions on this alignment may have acted in direct violation of the *City Development Plan 2005-2011* and in violation of the recommendations of the *Galway Strategic Bus Study* and the *Galway Transportation and Planning Study*.

With the construction of roads of this design, the Ardaun concept was fundamentally, and probably fatally, undermined. The proposed integrated sustainable urban community has been cut in two. The southern portion of the Ardaun lands have now been cut off by what could be best characterised as a “ring of steel” formed by the motorway and the dual carriageways.



Extract from NRA Brochure showing M6/N6 motorway along original alignment of the proposed bus/cycle corridor at Coolagh in Ardaun.

Other city council documents reviewed for this submission show no acknowledgment or understanding of the profound severance that results. The Ardaun section of the 2007 *Galway Gateway Innovation Fund Submission* describes the proposed route as a combined “bus-way / cycleway through Merlin Park to Park to Eastern bypass at proposed M6 link via new slip road”. Although the bus corridor is stated as also for use by cyclists, it is to join the N6 dual carriageway via slip-roads at the Coolagh Roundabout that marks the end of the M6. The idea that cyclists trying to access or leave Ardaun would be required to merge across traffic and use slip roads simply defies belief.



Extract from 2007 *Galway Gateway Innovation Fund Submission* showing revised alignment of proposed bus corridor through lands at Ardaun.

There is reference in various documents to facilitating walking and cycling *within* the Ardaun area. However this is too narrow a focus and simply misses the point about how integrated and sustainable cities are constructed. It is hard to see how the southern section of Ardaun could be viably integrated into the wider city or even the adjacent communities of Roscam, Doughiska and Briarhill/Coolough. The nature of the surrounding roads infrastructure creates a location where motorised travel will be imposed for most who wish to travel outside of south

Ardaun. It is an inherently unsustainable location in term of integrating with the wider urban fabric and amenities such as neighbouring employers, schools and retail facilities. Without a radical revision of the adjacent roads, the best option may be to abandon the southern section of Ardaun as a location for development and focus on other areas of the city.

Yours faithfully,

Shane Foran M.Sc.