

To: Department of Housing, Planning and Local Government, by email to [npf@housing.gov.ie](mailto:npf@housing.gov.ie)

From: John Mulligan, [REDACTED]

Re: Public Consultation on Draft National Planning Framework

Response to the Draft '*National Planning Framework: Ireland 2040*'

This submission responds to four specific elements of the draft plan, as follows:

1. National Policy Objective 6: *'Support regeneration of cities, towns and villages of all types and scale in order to accommodate changing roles and functions and enhanced levels of amenity and design in order to exert a positive influence on their surrounding area.'*
2. National Policy Objective 23: *'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.'*
3. National Policy Objective 48: *'Support enhanced public transport connectivity between large urban areas in Ireland and Northern Ireland.'*
4. National Policy Objective 51: *'Support the coordination and promotion of all-island tourism initiatives through continued cooperation between the relevant tourism agencies and Tourism Ireland.'*

These four specific objectives, as well as many other targets in general, can be achieved by developing a centrally planned and managed strategy that will deliver a national greenway network on the one hand, and that will focus on attracting significant overseas business in the leisure field on the other.

Much of the infrastructure can be delivered at significantly lower cost and in a much shortened timeframe compared to existing projects, if the planning and delivery of the work are coordinated centrally, and using state-owned assets for the most part.

I welcome the opportunity to input into this long-overdue process of developing a national strategy for the development of greenways and a greenway network. Ireland has lagged badly behind the rest of the western world in the development of this infrastructure, despite our being ideally placed to benefit from the rapid growth in this lucrative sector. Ireland has an ideal climate for cycling and long-distance walking, and our relatively flat terrain – especially along disused rail alignments and waterways towpaths – is perfectly suited to cycling tourism. Such tourists, Irish and international, tend to like our existing offering in terms of food, pubs and music, and only go elsewhere because we lack the long trails needed to sustain this business.

The extraordinary and immediate success of our existing short trails such as the great Western Greenway and the Deise Greenway also points to a huge pent-up local demand for such infrastructure. It is important to note that a high percentage of this usage is local; when the Deise Greenway was only partly completed it was crowded every weekend with local families who delighted in having a safe place to cycle or walk with their children, something that should be the norm rather than the exception. Such local traffic is important to local economies, with local money being spent locally to sustain jobs and services instead of being spent in cities or abroad.

## **State investment in greenways**

There is an urgent need for increased State investment in greenways, but it must be done in a manner that provides maximum return and it should be done *within an overall plan*. Proposed routes that do not fit within this overall strategy should be weighted as less important when making funding decisions. The first phase of any national greenway strategy should involve the planning and development of a network ahead of the development of unconnected short trails.

Leisure tourism based around long and/or connected cycling and walking trails has long been a feature in Europe, but Ireland has been slow to recognise this trend. Most investment so far has been piecemeal, apart from the concept of a Dublin-Galway route. A series of investments in unconnected greenway projects has provided useful local amenities, but has not advanced the national network to a point where we can attract international visitors who want to spend a week walking or cycling. The Deise Greenway for instance could easily be extended to New Ross and St Mullins to link with the publicly owned Barrow Way and Grand Canal Way, joining Dublin to Dungarvan and beyond to create our first long trail, but nobody seems able to 'join the dots' in this logical way. Given that the Grand Canal towpath has a cycleway all the way to the edge of Dublin city, the lack of a plan to extend it to Dungarvan and onwards towards Cork is all the more puzzling.

The need therefore is not just for investment, but for this investment to be done in a centrally-planned way using 'joined-up thinking.' Priority must be given to projects that form part of an overall plan.

There is an impediment to the development of a walking and cycling network in the attitude of some local authorities; the approach to greenways varies from enthusiastic in some councils to antagonistic in others. In some cases the finances are so limited within Councils that they lack the funds for the necessary studies that would allow them to apply for funding for greenway projects, even projects that would fit well with a national network. It is imperative that the planning and delivery of a national network is taken away from local authorities and given to a dedicated unit in the Department of Transport. This would not only speed up the process but would also allow for economies of scale that have been noticeably lacking in some local projects. A motorway network could never have been delivered by County Councils but the NRA delivered it quickly and efficiently, and similar approach needs to be taken to greenway development.

## **Consultation with communities**

Consultation is desirable and necessary, even if the process has descended into farce in some cases. The erection of eight foot high 'giraffe fencing' to appease one Waterford farmer on the Deise route, and the effective pleading for permission from adjoining landowners for the construction of greenways on publicly owned lands have taken the consultation process to extremes. Additional unnecessary and expensive work appears to have been done in Waterford and Mayo to appease objecting farmers who had no reason to object to the development of these amenities. A section of closed rail route in Waterford, the branch to Ballinacourty, appears to have been ceded to effective private ownership to help ease the route of the main greenway to Dungarvan.

The first response to development in rural Ireland has become the 'Ballyeverywhere says no' response, an automatic stance often aimed at extracting compensation from the public purse for local infrastructure that brings jobs and amenity value to communities. In many cases, the people

behind the protests are the same people who complain that their communities lack infrastructure and opportunities. Bodies like the IFA complain that rural communities are neglected, but they are the first to oppose greenway development in rural areas, and are frequently involved in scaremongering about mythical crime sprees that they say follow greenway development. A national greenway passing by a farm provides a valuable opportunity for additional off-farm enterprises, and can make non-viable farms viable; farm bodies should be supporting greenway development, not opposing it. A national greenway plan needs to sell the message of the benefits of greenways to communities and landowners, in order to counteract the negative propaganda that currently occupies most of that debate.

### **Use of State-owned lands**

- The use of State-owned lands allows for provision of more mileage, much more quickly and cheaply than having to acquire privately-owned lands.
- The permissive access model on private lands is always at risk from unrelated disputes as has been seen already in Mayo.
- Old rail lines are ideal for greenways, they are flat in profile and engineering infrastructure such as bridges is already in place.
- Greenways on old lines protect the rail alignment for future rail or other use.
- Existing stone ballast on lines like Athenry-Collooney is of no value to Irish Rail for rail use, but makes an adequate, free and environmentally-friendly base for a cycle path.
- Railway heritage adds interest to trails, and restored railway buildings can provide useful service stops, including trail-head car-parking in many cases.
- Old rail routes deliver tourists to the centre of towns, and allow larger numbers of local users to have access to the facility.
- So-called 'parallel greenways' – cycle paths built within the alignment of existing 'live' rail lines – are a feature in many countries, and can form part of the solution when identifying routes that can form part of a national network. We have none in Ireland, despite Irish Rail having no issue with them.
- Because of their flat profile, greenways on old rail lines or alongside existing lines can be made completely accessible to people of varying ability, unlike some proposals to follow rivers or minor roads.
- Canal and river-navigation towpaths are an often neglected asset that can easily be restored and improved for cycling and walking access.
- Lands owned by Bord na Mona and Coillte can help 'join the dots' in the creation of a national greenway network.
- The planning of a national greenway network should take other complimentary uses for the land into account; the development of a greenway network allows for the laying of ducting to facilitate broadband cabling between centres, and there can be a resultant cost benefit to trail developers. In the case of Athenry-Collooney, this route could also

facilitate the passage of natural gas and industrial fibre data cabling, to encourage the development of food processing industries and data centres in neglected towns.

- The use of canal and river navigation towpaths is a quick way to deliver high-quality greenways and to put these corridors to wider use.
- Existing railway alignments can often accommodate greenways without having to acquire extra lands – the so-called ‘rails with trails’ model that is so successful elsewhere but that is almost never used in Ireland. An occasional passing train does not make such parallel greenways any less attractive to users.

### **Permissive access model**

The ‘permissive access over private lands’ model for greenway construction should only be used where all else has failed, given the problems experienced so far with this method. However in the case of publicly-owned lands such as disused railway alignments, the use of permissive access is a good way to allow for the reversion to rail use, should this ever be necessary at any time in the future. Permissive access over private lands should only be a course of last resort.

### **Rural regeneration**

Greenways can play a significant role in rural regeneration, and examples abound in Ireland despite our lack of any significant mileage of trails. Newport in Mayo is a good example, a town that was struggling and where the hotel had closed. It is now a thriving town and the hotel and a number of other businesses have been revived or created on the back of the greenway business. Kilmacthomas in Waterford is another; despite the Deise Greenway only opening in March of this year, the change in Kilmacthomas is striking.

Even where a small town or village is only an incidental stop on a national greenway network, the throughput of visitors whose destination is further down the trail to a larger centre can have a significant impact locally. If Ireland builds a real network that can sustain the long-distance cycling and walking business that is so successful elsewhere, these small places can sustain local businesses on the back of the additional customers that the greenway delivers. Greenhead in Northumberland is a good example of such an intermediate trail stop; almost abandoned a decade or so ago, the Hadrian’s Wall Path has brought life to the village, and the success of the local Greenhead Hotel and neighbouring hostel have not only created jobs but also kept a village pub, restaurant and social centre open. Likewise, the ‘Twice Brewed’ Pub at Hexham now provides not only a useful stopover on the Hadrian’s Wall path, but its re-opening has created a lively and thriving social centre for this isolated community, as well as a number of jobs for local people.

Rural tourism has one of the highest distributive effects of any industry, with the multiplier effect of income that is spent again and again in local areas. Such business not only helps create jobs and business opportunities, but also helps keep existing services viable and in place for local people.

## **Existing national cycle network plan, is it still relevant?**

The existing plan needs to be updated to take account not only of transport and commuting needs but also of the potential role of greenways in the development of tourism and in rural regeneration. It also needs revision to take account of the development of 'spine routes' that will have a role not only for work and school commuting but also for the development of the long-distance or cycle touring business, a lucrative and growing business that has not been exploited by Ireland to date but that has proved successful elsewhere. To that end, the exploitation of publicly-owned corridors such as canal and river navigation towpaths and all closed or disused railways should be prioritised, given their potential to quickly and cheaply deliver significant mileage of long trails that also connect with town and village centres, schools and workplaces. Additional mileage can also be easily added to these links by examining the 'rails with trails' option that has been successful in other countries. For example, the alignment on the Ennis Athenry rail line is generally wide and would require little additional land acquisition to connect the Dublin-Galway greenway to Ennis and to the proposed greenway on the old West Clare Railway line. It could also form a key part of a long route from Donegal to Kerry if extended to Limerick and linked to the Great Southern Trail.

Proposals by some politicians and tourism groups to follow the Connemara and Mayo coast with a cycle trail should be questioned in that any such development will drive additional tourism to a corridor that will reach capacity organically in any case from existing initiatives like the 'Wild Atlantic Way', while ignoring a more achievable inner route that is starved of investment and jobs and that passes through a region that is being ignored so far in this national strategy. The railway route from Athenry to Sligo is all off-road and in public ownership, unlike the proposal to route along the coast, and can be therefore delivered quickly and cheaply. It is also flat and level and can be made completely accessible to people of varying abilities.

The Athenry-Collooney route (dubbed the 'Western Rail Trail' by campaigners) can for instance be easily connected to the Dublin-Galway route, regardless of the final agreed map for the latter. If the Dublin-Galway route does not pass through Athenry and instead goes through Craughwell as originally planned, there is adequate room on the edge of the alignment of the Ennis-Athenry line for a 'parallel greenway' to Craughwell to facilitate that connection. The route can connect with Northern Ireland via the proposed Collooney-Enniskillen Greenway, and also to the Wild Atlantic Way at Sligo and Galway

The aspiration for a coastal route is a much longer-term project that should not be prioritised ahead of the 'Western Rail Trail' option.

## **Adventure tourism**

One person's adventure is another person's stroll in the countryside; not everybody wants to charge down a mountain on a bike. For many people, the notion of going for a day-long trip by bike with their families remains in the realms of wishful thinking, given the dangers of trying to have such an experience on public roads. A decent greenway network provides the infrastructure for most people to access part of a long trail with their families.

There is however a synergy between greenway development and more robust activities that needs to be taken into account. Families where one or more members take part in downhill mountain-biking also tend to also have members that want to cycle or walk on more accessible terrain. In the

case of Coolaney in County Sligo – the home of a proposed major mountain bike park – the location of the village on the so-called ‘Western Rail Trail’ from Collooney to Athenry will make it an ideal destination for entire families seeking varying levels of adventure, should both the greenway and mountain park be developed. These kinds of synergies need to be examined and identified when planning either kind of project.

#### **A squandered opportunity; why Ireland is missing out:**

- Around 20 million Europeans take a cycling holiday each year, almost none of them come to Ireland because we lack the long routes necessary to sustain this business.
- These tourists tend to stay longer and spend more, much of it with small providers.
- We have an excellent climate and a long season for cycle tourism.
- Rural Ireland has the product that is sought by these customers; B&Bs, local pubs, heritage, traditional music, friendly people and an unspoiled environment; we just need the network.
- We own most of the land needed to develop the initial network, and in addition, much of it is flat and very suited for this kind of infrastructure. It also connects directly to the centre of small towns.
- Some of the key sections are already complete and/or ready to build.

#### **Priorities:**

1. Complete the Dublin-Galway link, using State-owned lands where possible. Irish Rail is amenable to a parallel greenway alongside some or all of the existing rail line, and Coillte and Bord na Mona own considerable tracts of land along the route.
2. Prioritise other long routes that can be added to create critical mass of mileage, as follows:
  - (a) Western Rail Trail from Athenry to Collooney. The Belaghy-Collooney section is ready for feasibility study, with outline details agreed with Irish Rail and Sligo County Council, and Tuam Greenway Group has offered to fund a feasibility study for Galway section. There is a unique branding opportunity on Athenry-Tuam section as ‘the Quiet Man Greenway’, given that it passes by Ballyglunin Station, a heritage building that was the location for ‘Castletown’ in the original movie.
  - (b) Develop a short link from Kiltimagh on the Western Rail Trail to the Great Western Greenway at Turlough House at the Museum of Country Life. This will connect Dublin to the existing Great Western Greenway.
  - (c) Develop the existing towpath on the Grand Canal from Dublin to Robertstown/Lowtown and along the Grand Canal branch from Lowtown to Athy. This route is already complete from Dublin centre to Clondalkin at the edge of the city, and 20% of route to Athy is already in place on minor canal-bank roads that carry very light local traffic. This is a very low-cost option to feed the South East of Ireland into our largest centre of population.

- (d) Resurface the Barrow Way towpath from Athy to St Mullins (already in planning process with Waterways Ireland but the subject of highly organised objection from local minority interests).
- (e) Develop a greenway from St Mullins to Waterford via New Ross, using disused rail lines where possible to link with the Deise Greenway. Waterford County Council have existing plans to develop the Waterford section, and should be encouraged to prioritise this route.
- (f) Examine routes suitable for extending the Deise Greenway westwards towards Cork and Kerry. Some closed rail lines may be suitable for some or all of this.
- (g) Develop the Sligo, Leitrim and Northern Counties Greenway from Collooney to Enniskillen, along with a link from Sligo to Collooney through Coillte-owned Union Wood. The feasibility study for much of this project is already complete. This will connect the North-west to the proposed NI greenway network.
- (h) Develop the Grand Canal towpath west from Lowtown to Shannon Harbour.
- (i) Extend the Grand Canal towpath further westwards across the Shannon from Shannon Harbour to Ballinasloe, using a new footbridge on the site of the old horse bridge. The dry canal to Ballinasloe (now mostly in ownership of Bord na Mona) creates a route to link the Grand Canal to the Dublin-Galway route at Ballinasloe. This will also provide an alternative return leg for tourists travelling from Dublin to Galway.
- (j) Complete the link from the Grand Canal to the Royal Canal via Kilbeggan to create a two or three-day loop from Dublin. Old towpath on Grand Canal branch from Tullamore to Kilbeggan is partly restored by a local group, and a feasibility study for Kilbeggan to Royal Canal section is complete. Some funding may be available from Kilbeggan Amenity Group. This is a very cost-effective project that will have significant impact on towns like Kilbeggan and Tullamore.
- (k) Complete the Navan-Kingscourt route on the disused rail line. Feasibility study is complete, and Irish Rail and Meath County Council are supportive.
- (l) Examine the possibility of a link across the border to the NI greenway network from Kingscourt. The old rail line is mostly lost to public ownership but could be acquired at reasonable cost.
- (m) Develop a greenway on the Boyne Navigation towpaths to connect Navan to Drogheda. Some sections are already restored near Newgrange, and a new greenway is in place further downriver from Newbridge House (Battle of the Boyne site) to Drogheda (being extended to Laytown). This project would not only form an important part of a national network, but would also create a walking and cycling link between the Battle of the Boyne site and Newgrange, both of which lie beside the towpath.
- (n) Existing plans to create a cycle route along East Coast could result in a 'grand tour' route that starts and finishes in Dublin, via Athenry, Sligo, Enniskillen, Kingscourt, Navan, and Drogheda and back to Dublin. This would give us a 600 km route that would sustain a one-week cycling holiday, and that would be a game-changer for rural regeneration.
- (o) Complete the Great Southern Trail eastwards to Limerick and west to Kerry.

- (p) Develop a 'parallel greenway' on the rail line from Athenry via Ennis to Limerick, to link with the GST and also with the proposed 'West Clare Railway' route from Ennis.
- (q) Complete the Royal Canal Greenway from Abbeyshrule to Termonbarry, and examine the feasibility of extending it to Strokestown and the National Famine Museum, as well as to existing hotel accommodation. The owners of Strokestown Park House are supportive of the final section of this being run through their lands. Much of the canal-side part of the route is already stoned following the canal restoration works, and can be surfaced cheaply and quickly.

### **Threats to progress:**

1. Local Authorities are not the ideal bodies to develop a national infrastructure network, often with over-influence from local issues, pedantic operating methods and a history of excessive costs in greenway construction. A dedicated central body is needed to plan and deliver this infrastructure.
2. Opposition from adjoining landowners, often driven by farm bodies seeking cash payments for members, and by vested interests. These organisations often complain of a lack of investment in rural Ireland, but seem unable to understand the benefits of a greenway to an adjoining landowner. More work is needed in this area to get these groups on board, and there needs to be an emphasis on the benefits that greenways can bring to landowners as well as to communities.
3. Anti-social behaviour on greenways is rarely an issue, but the fear of it can delay projects and fuel opposition. The Police reform Act 2002 has proved successful in this regard in the UK and must form part of any national greenway strategy here. See below \*\*
4. A disjointed policy that delivers short greenways with no linking strategy. This will fail to deliver the additional visitors that will provide a fast repayment to the State, and may reduce the enthusiasm for this kind of development at National level.
5. Over-influence by tourism bodies that seek to have greenways link to their existing investments instead of allowing them to follow more logical routes. The insistence in the case of Dublin-Galway to have that greenway connect with Clonmacnoise is a case in point – that has created a route proposal that has proved difficult to deliver and that deviates from a more direct Dublin-Galway route. Clonmacnoise can be serviced by a spur from either Athlone or Shannon Harbour which can form part of an eventual link between Athlone and the Grand Canal Way.

### **\*\* Police reform Act**

In the UK the Police Reform Act 1992 has successfully dealt with the problem of unauthorised use of trails by motorcyclists or motor vehicles by enhancing police powers to deal with the antisocial use of motor vehicles on public roads or off-road. In practice, if a motorcyclist or user of any mechanically propelled vehicle trespasses on to a greenway in the UK they are issued with penalty points and a fine, and a second offence results in the loss of the motorcycle or motor vehicle. This



has proved effective in acting as a deterrent, and has also reduced the need for expensive physical barriers to motorcycles or motor vehicles where roads and greenways intersect. It is important that this or similar legislation is enacted here as part of any national greenway strategy.

**Summary:**

1. Ireland has failed to attract any of the 20 million European tourists who take cycling holidays, because of our lack of long trails.
2. Lack of an overall plan has delivered a series of unconnected short greenways, lacking the connectivity to support the lucrative cycle touring market.
3. A single national body is needed to deliver a network; giving this responsibility to the local authority sector is not the most efficient way to deliver any kind of national infrastructure.
4. State-owned linear corridors such as canal and river navigation towpaths and disused or closed rail lines, and including parallel greenways on suitable main rail lines should be prioritised for the development of a greenway network.
5. Disused rail lines and canal and river navigation towpaths are of necessity flat and level and can be made accessible to persons of varying abilities.
6. ***Developing greenways in existing tourism hotspots may not be the best way to grow this business; thought should be given to the use of cycling and walking corridors as a way to seed tourism development in rural areas that are not already likely to reach capacity organically in any case.***
7. Farm bodies need to be convinced of the value of greenways to adjoining landowners, as amenities for farm families and for additional on-farm enterprises and income streams.

**Contact details:**

