

4<sup>th</sup> September 2019

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

**AN BORD PLEANÁLA**  
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PI. Ref. PL06F.304624  
Proposed Greenway between Malahide Demesne and Newbridge Demesne  
(The Broadmeadow Way)

Dear Sir/Madam,

I wish to make the following observations in respect of specific aspects of the proposed greenway between Malahide Demesne and Newbridge Demesne known as the Broadmeadow Way submitted by Fingal County Council. At the outset I wish to state that I am generally in favour of the proposed development and it is clear that the Council has gone to considerable lengths over several years to bring the proposal to this point having regard to competing objectives and the need to strike a balance between them.

The proposed greenway, if built, will open up a new amenity which should provide a scenic attraction for recreational users, tourists (both domestic and foreign) and commuters alike. As a potential user of the proposed greenway, I wish to ensure that the development provides a high quality user experience and my observations are made with a view to enhancing that experience.

**A:- Height of the wall along the Estuary**

The most significant element of the proposed development is, without doubt, the section from Bisset's Strand to the north shore of Malahide Estuary. It is clear from the published documentation that much consideration was given to mitigating any potential adverse impacts on the Malahide Estuary Special Protection Area (SPA) and Special Area of Conservation (SAC). Chief among such considerations was the need to minimize potential disturbance impacts on waterbirds from pedestrians and cyclists. The proposed solution is to build a 1.4m high wall along the western side of the proposed greenway.

There are a number of aspects to this element of the scheme which need to be considered before any decision is made and I wish to draw the following matters to the attention of the Board:-

1. The provision of a continuous solid 1.4m high wall (4' 7" high) for almost the entire length of causeway (nearly 2km) will create a tunnel-like effect (obviously without the roof) due to the fact that many users will be screened from view. This long narrow corridor will act like a rear

alleyway, with almost no passive security. This will render users fearful for their own personal safety. Once a user commits to traversing the greenway at this location there is no way out other than to complete the journey to the other side or retracing one's steps. A critical success factor for the greenway lies in its attractiveness at presenting a welcoming and inviting environment where people's personal safety is not put at risk. The success of the proposed greenway could be significantly undermined and the objective of the Council might not be realized. It may be argued that safety considerations are not relevant to the Board's assessment of this proposal. However, equally it can be argued that the long-term sustainability of the proposal enables the Board to have due regard to such considerations and the implications of the proposed development on proper planning and sustainable development in the area.

2. The Natura Impact Statement (NIS) at Section 5.5.9 states that "various designs have been considered" and goes on to state that "a solid wall screen (1.4m) is proposed for the entire length of the causeway, including the bridge crossing at the weir" (Section 5.5.10). No information has been provided in relation to the various designs which were considered thus rendering it impossible to assess the comparative merits or otherwise of alternative designs to the selected design. It is understood that one of the main concerns regarding disturbance to birds relates to human leg movements. This can be substantially eliminated by providing a solid wall up to waist height (approximately 1.1m). The reason for increasing the wall height above waist height to 1.4m has not been clarified. This is a matter which should be of concern to the Board.
3. A serious issue has arisen in relation to the drawings for the proposed development in respect of the estuary crossing. All of the cross sections through the greenway along the causeway which are shown on the Planning Drawings, the EIAR Drawings and the NIS Drawings are inaccurate and convey a misleading impression. Specifically, Cross Sections 9-9, 10-10, 12-12 and 13-13 along the causeway convey the impression that the height of the stone wall is waist high (1.0 – 1.1m). In addition, Cross Section 11-11 at the bridge over the weir conveys a similar impression in respect of the precast units (1.1m high). This is evident on A3 Drawing Nos. 12-160-257, 258, 259 and 260, A1 Drawing Nos. 12-160-465, 466, 467 and 468, and also on A0 Drawing No. 151/4612A. While convention dictates that written dimensions take precedence over scaled dimensions, the clear impression is conveyed that the wall height will not be an impediment to the enjoyment of the views from the greenway. At 1.4m high (as stated on the drawings), this is clearly not the case and many users will be extremely disappointed that their enjoyment of this new amenity will be so severely restricted. It is highly likely that these errors occurred over time while the scheme was being developed through various iterations and that such errors arose inadvertently. Nevertheless, the Board must consider the potential impact of these errors prior to making any decision on this application.
4. Another issue relating to the drawings of the greenway along the causeway relates to the insertion of the note "Proposed 1.4m Wall (for wind protection)" on each of the cross sections mentioned above. As far as can be ascertained, no reference to wind protection is to be found in the written documentation accompanying this application. Therefore, this begs the question as to why this is shown on the drawings. It is understood that regard was had to the Sustrans Design Manual "Handbook for cycle-friendly design" Chapter 8 (April 2014) in respect to the

height of the wall. For bridges, the Manual states that the parapet height of 1.4m is "preferred for cyclists, but many existing bridges operate well with lower heights". For substandard heights reference is made to Sustrans Technical Information Note 30 (Parapet Heights on Cycle Routes). In such cases the principal risk identified relates to the risk of falling over a parapet. It is interesting to note that while many design examples are shown, including trunk roads and motorways, almost all of the examples relate to metal parapets with steel mesh fencing and none show solid walls of 1.4m high. This suggests that the need to provide a 1.4m high wall for wind protection should be clarified before any decision is made on this application.

5. The NIS considers that the proposed development would have no adverse effect on the integrity of the conservation objectives of the Malahide Estuary SPA and SAC within the potential zone of influence (Section 5.6). The NIS also acknowledges that the estuary is already a busy amenity area, crossed by a main rail line, and the inner estuary is a popular water sport area (Section 7.1.5). The NIS concludes that with the application of the mitigation measures there will be no adverse impact on the Malahide Estuary SPA. In addition, there will be no long term impacts ... and the integrity of Malahide Estuary SPA and Malahide Estuary SAC will not be adversely affected by the proposed development ... (Ss. 7.1.6-7). The lighting design minimises the risk of disturbance to birds and light spill to the inner estuary will be insignificant. The EIAR indicates that for the operational phase of this project the noise impact assessment has demonstrated that mitigation measures are not required (Vol. 2 Section 10.6.22). The remaining types of activities that are most likely to cause disturbance to fauna are those related to visual and auditory cues. The existing (receiving) environment has a relatively high level of these types of disturbance, particularly in areas with high levels of human related activity near the inner estuary. As such, it would be expected that many of the species occurring in the area are relatively tolerant of, or habituated to, these kinds of disturbance (NIS Section 6.3).
6. The key issue remaining relates to the height of the solid screen wall along the western side of the proposed greenway across the estuary. It may be helpful to note that the wall constructed some years ago between Baldoyle village and Sutton DART Station measures 700-800mm in height in the area of the Baldoyle Bay SPA and SAC. Furthermore, the recently constructed wall along the Clontarf Road is generally 550mm high rising to 750mm in places while the old wall height along James Larkin Road to Dublin Road varies from 700mm to 1.1m where the cycleway is elevated above adjacent road levels. These walls bound the North Bull Island SPA and the North Dublin Bay SAC. The movement of waders and wildfowl between these SPA sites has long been recognised, the activities which could give rise to disturbance are of a similar nature and yet, the necessity for high screen walls has not been warranted.
7. Arising from the above, the Board is requested to enquire further into the reasoning why a 1.1m high wall might not be sufficient to mitigate any potential adverse impacts of the proposed development. It would contribute to greater enjoyment of the amenity which, presumably, is the reason for advancing this proposal in the first place. It is respectfully suggested that an oral hearing be held so that the arguments for and against such a course of action are fully teased out in the presence of all interested parties.

**B:- Traffic Management System at Bisset's Strand Railway Bridge**

The proposed traffic management system at the railway bridge with Stop/Go lights for vehicular traffic and a priority sequence for cyclists needs to be developed in more detail before being allowed to proceed. The current system operates on a courtesy basis and there have been no recorded accidents on the RSA database. This is precisely because all road users must exercise due care and attention when approaching this location. Furthermore, it facilitates the freer movement of all road users without significant queueing. In recent times, yield signs have been placed on the western side of the bridge, thereby giving priority to traffic coming from Strand Street and this has improved the flow. The introduction of a Stop/Go system will inevitably create significant queueing and add to congestion in the vicinity of Strand Street and elsewhere. Perhaps a flashing amber system or a user activated system could be considered instead to mitigate the negative impact of the proposed system. The published documentation presents no analysis to support the current proposal. No estimates of the increased number of cyclists or pedestrians has been presented. Also, the proposal to link the signals to the toucan crossing at Hanlon's Lane, while sounding good in theory, might complicate matters further with no real improvements apparent due to the unpredictability of predicting pedestrian and/or cyclist movements. It is recommended that the Board seek further clarification of this proposal.

**C:- Toucan Crossing at Hogan's Gate on R106**

The plans for the proposed toucan crossing show the crossing on the western side of Hogan's Gate. In recent weeks, a toucan crossing has been constructed to the eastern side of Hogan's Gate near the entrance to Bridgefield Carpark although it is not yet operational. Arguably, this is in a better location than that shown on the plans.

I trust that careful consideration will be given to the points raised above.

Yours faithfully,

  
Brendan Fleming