

# Malahide Community Forum

The collective voice of Malahide Residents' Associations

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23rd July 2019

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

Dear Sir / Madam

<b>AN BORD PLEANÁLA</b>	
LDG-	017734-19
ABP-	
24 JUL 2019 Dot	
Fee: €	50 Type: card
Time: 12:26	By: hand

**An Bord Pleanála Reference : PL06F.304624 - Broadmeadow Way**

Malahide Community Forum is the umbrella organisation for all the area's Residents' Associations and therefore represents a large majority of the residents of Malahide.

We wish to advise that we support the contents of the observation submitted by the residents of O'Hanlon's Lane Residents Association (attached below). We welcome the idea of a cycle and greenway linking Malahide to Donabate. However we object to the proposed plans, specifically the route through O'Hanlon's Lane. This is not a suitable route on the grounds of safety on O'Hanlon's Lane.

We feel that a better route for the Broadmeadow Way would be through the new development at Malahide Casino with direct access from Malahide Train Station. The development at The Casino was not finished when the impact studies for the Broadmeadow Way project were completed and so this route was not considered. This alternative route would have the added advantage of linking in with the train station to accommodate a much better experience for visiting tourists arriving by train. We further estimate that this alternative route would be within the existing budget of the project.

Yours sincerely,

[REDACTED]  
Niall Warren

Hon. Sec.

**Committee members:**

**Chairman:**

Gerry Duggan

**Vice-Chairman:** Hazel Bolton (Castle Terrace)

**Hon. Secretary:**

Niall Warren

**Hon. Treasurer:** John Shirey (Millview)

John Burke (Abbott's Hill), Gary Coughlan (Biscayne), Kevin Daly (Seapark), Michael Dangerfield (Seamount), Michael Dowling (Chamley Park), David Greene (The Moorings), Gerry Duggan (Broomfield), Ciara Moclair (St. Margaret's Rd), Michael Giblin (Old Golf Links), Tony Doran (Church Rd), Olan Howell (Dunard), Marian Keane (Chalfont), Marna Law (Marina), Helen Lyons (Gaybrook), Donal McCarthy (O'Hanlon's Lane), Helen McGivern (Old St/Railway Ave), Paul Nevin (Milford), Harry O'Neill (Auburn Grove), Richie McDonald

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Honorary Secretary,  
O'Hanlon's Lane Residents Association.

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

20<sup>th</sup> July 2019.

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Submission of observation Re: Application for approval to An Bord Pleanála by Fingal County Council to carry out a proposed development (Broadmeadow Way), consisting of new greenway (shared footpath and cyclepath), between Malahide Demense and Newbridge Demense.

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A Chara,

O'Hanlon's Lane Residents Association submit an observation with respect to the above-mentioned proposed development by Fingal County Council.

O'Hanlon's Lane Residents Association do not object in principal to a cycling/pedestrian public amenity project between Malahide and Donabate. It is recognised by the residents that such an amenity provides a welcome tourist attraction to the Malahide area and will contribute to economic and social development.

However, residents have significant concerns on the route selection, design suitability and safety considerations as set out in Section 3 – R106 Dublin road, Malahide to Bisset's Strand. Residents of O'Hanlon's lane shared their concerns at a meeting of the Residents Association on 20<sup>th</sup> June 2019. A summary of these principal concerns is listed below:

1. Safety of users and residents
2. Risks / Hazards to proposed users and residents
3. Traffic management planning
4. Consideration of Greenway design standards
5. Boundaries treatment
6. Protection of flora and fauna
7. Preservation of the character and aesthetics of the lane
8. Parking considerations
9. Assessment of alternative routes

These concerns are detailed in sections 1 through 9 hereunder.

O'Hanlon's Lane Residents Association Chairperson: \_\_\_\_\_

Joe Duddy

O'Hanlon's Lane Residents Association Secretary: \_\_\_\_\_

Donal Mc Carthy

## **Section 1 - Safety of users and residents**

O'Hanlon's Lane is a narrow lane with restricted sight lines at its northern end. The lane joins a busy footpath and primary access road to Malahide village at its southern end. The lane can accommodate single car-width traffic only for significant portions of its length.

### **1.1 Safety Assessment**

It is not clear if an appropriate safety assessment been conducted for Section 3 of this proposal. No assessment materials or associated criteria are referenced in the proposal. Figure 1.1 is an extract from Fingal County Council response to the public consultation process. The response acknowledges that safety concerns were raised as part of the consultation process. However, the response does not adequately outline how these have been addressed. A summary of anomalies (as highlighted in Figure 1) in this response include:

- The details of the technical and safety assessment that resulted in O'Hanlon's lane being deemed the preferred route have not been shared
- O'Hanlon's Lane does not provide the highest quality of service from a road safety point of view as suggested in this document and falls on several road safety requirements and cycleway design standards
- The document suggest alternative routes were not selected due to having on-street parking. O'Hanlon's Lane has on-street parking
- The document suggests traffic free routes are an essential part of encouraging users. O'Hanlon's Lane is not traffic free
- The document suggests the narrowest point on the lane is 2.75M. A survey of the lane by residents found the narrowest point of the lane to be a width of 2.4M
- There document suggests wider widths can be achieved through "Minor Trimming". The hedges on southern end of O'Hanlon's lane have been significantly cut-back in recent months given spring and summer growth and the narrowest point of the lane measures a width of 2.4M

**Figure 1: Source: Fingal County Council Response to the Public Consultation Comment - Highlighted anomalies in Section 3**

<p><b>9 Response to Public Consultation Comments</b> (Prepared by Clifton Scannell Emerson)</p> <p><b>9.1 Introduction</b> This section responds to the queries and comments received during the public consultation process. The queries are summarised with a corresponding response to each of the queries received. The responses aim to demonstrate if the issue had already been considered or requires further examination.</p> <p>As noted in the Public Consultation Questionnaire Analysis above, the majority of the respondents are in favour of the proposed trail.</p> <p>There were a number of similar queries and comments received which we have grouped together and a single response is provided to address these comments in Section 3.2 below.</p> <p>All other queries and comments received are responded to in Section 3.3.</p> <p><b>9.2 Grouped Observations/Comments</b></p> <p>The three main observations/comments are summarised as follows:</p> <p><b>A.</b> The emerging preferred route does not adequately serve the history and the main commercial area of Malahide Village. There is no connectivity between this scheme, the Swords/Malahide/Sutton (SMS) Cycle Scheme and the Malahide Public Realm Strategy.</p> <p><b>B.</b> Safety concerns were raised in relation to the section of the emerging preferred route along O’Hanlon’s Lane for both users of the trail and residents of O’Hanlon’s Lane.</p> <p><b>C.</b> The emerging preferred route does not adequately service Donaghadee Village and usage of the trail will be curtailed due to the opening and closing hours of Newbridge Demesne.</p> <p><b>9.2.4 Grouped Observation/Comment B</b> “Safety concerns were raised in relation to the section of the emerging preferred route along O’Hanlon’s Lane for both users of the trail and residents of O’Hanlon’s Lane.”</p> <p><b>9.2.5 Response to Observation/Comment B</b> As part of our assessment we have considered all feasible route options from a Technical, Safety, Integration, Construction Impact and Environmental perspective. Of the route options reviewed O’Hanlon’s Lane was the most preferred route option under each of the assessment criteria. The route down O’Hanlon’s Lane is identified as part of the overall cycle and pedestrian network on the current Fingal County Council Development Plan.</p> <p>O’Hanlon’s Lane route provides the highest Quality of Service, in particular from a Road Safety, Desirability and Comfort perspective.</p> <p>As O’Hanlon’s Lane does not allow through vehicular traffic the volume of traffic is minimal, serving local residential houses only. This means that the number of vehicles using the laneway on a regular basis is low and the majority of users are familiar with the restrictions on the lane.</p> <p>All of the alternative routes are through roads with much larger traffic volumes (including heavy goods vehicles) and include on-street parking, loading bays and higher average speeds which would be considered hostile conditions for a proposed trail. These “hostile” traffic conditions can and do put cyclists at risk. Traffic free routes are an essential element in encouraging as many people, especially the very young or very inexperienced, to start cycling. Once confidence is gained (usually</p>	<p>through receiving cycling training) than if the road network and driver behaviour is conducive to cycling, they will proceed to use the road for many journeys.</p> <p>We believe the emerging preferred route for the Broadmeadow Trail down O’Hanlon’s Lane will provide the best and safest experience for all trail users, especially for less experienced cyclists including young children and mobility impaired users but will be reviewed as discussed in Section 3.2.3 above.</p> <p><b>9.2.6 Proposed Actions</b> As part of the development of the next stage of the scheme and in response to the above observation, Fingal County Council will review the following items and intend to incorporate the most viable options into the EIS/MS for the application to An Bord Pleanála.</p> <ul style="list-style-type: none"> <li>• The access point at the Dublin Road will include the widening of the existing footpath to a 3.2m wide shared surface which will increase the existing signage and safety for vehicles exiting O’Hanlon’s Lane onto the Dublin Road.</li> <li>• Installation of a yellow box on the Dublin Road opposite O’Hanlon’s Lane to allow cars exiting O’Hanlon’s Lane better access from the Lane.</li> <li>• The junction at O’Hanlon’s Lane and Bisset’s Strand will be upgraded to incorporate a safer access for all users from O’Hanlon’s Lane including a pedestrian toucan crossing onto Bisset’s Strand.</li> <li>• On site measurements of the narrowest point on O’Hanlon’s Lane showed a width of 2.75m is achievable with a potential increase of the lane width to 3.25m with minor hedge trimming on both sides.</li> </ul> <p><b>P20</b></p> <ul style="list-style-type: none"> <li>• Increase in insurance FCC Public Liability</li> <li>• Insurance will cover the trail when completed.</li> <li>•</li> </ul> <p><b>P31</b></p> <p>Investigate if there is a better route option rather than down O’Hanlon’s Lane.</p> <p>Alternative routes in this section of the trail were assessed as part of the selection of the emerging preferred route using agreed criteria and O’Hanlon’s Lane was assessed as the best connecting route between the Dublin Road and Bisset’s Strand.</p> <p>Review the emerging preferred route option analysis for Section 3 of the proposed route, in particular the routes through Malahide Village as part of the detail design.</p> <p><b>9.4 Summary</b> Following our review of the comments and submissions above, further assessment is required as part of the detail design for the project in a number of areas. This includes the identified actions in response to the grouped observations (Sections 3.2.3, 3.2.5 &amp; 3.2.6) and the identified actions in response to the individual observations (Table 13).</p> <p>This further assessment will be carried out as part of the detailed design for the project which will then identify the “Preferred Route Option” for the Broadmeadow Way trail.</p> <p>An EIS/MS will then be carried out on the “Preferred Route Option” which will form part of the application to An Bord Pleanála for the overall scheme.</p>
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The Residents Association put forward that section 3 of the proposed route along O’Hanlon’s Lane does not comply with road safety regulations and safety guidelines; with respect to passing distances, sightlines and detailed junctions.

Figure 2 below is an extract from Fingal County Council application Section 3 – R106 Dublin road, Malahide to Bisset’s Strands. There are several anomalies (as highlighted in Figure 1.2) in this section of the proposed design, namely:

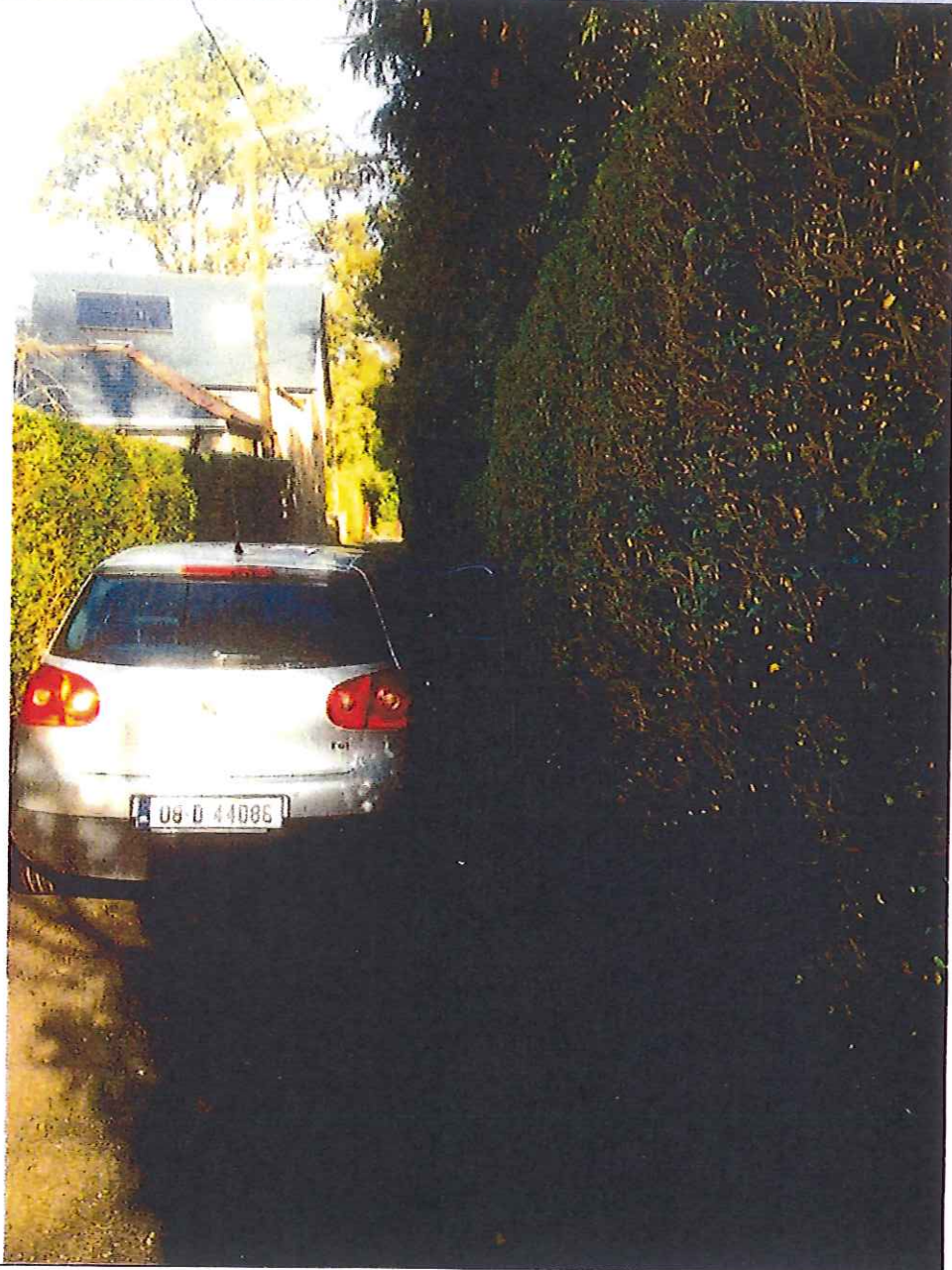
- The Southern end of the lane does not run for 140 Metres at a width of 3.5M
- The hedges on southern end of O’Hanlon’s lane have been significantly cut-back in recent months given spring and summer growth and the narrowest point of the lane measures a width of 2.4M. This strongly suggests that a proposed width of 3.5M is not achievable by hedge trimming
- There are no civil infrastructure items proposed to address lighting inadequacies, user safety, traffic management, sight lines, parking, surface water management
- The document suggests the design has taken account of the National Cycle Manual for the purposes of signage and road markings. It does not reference the guidelines and standards outlined in this Manual for safety and user comfort.
- User projection provided by Fingal County Council suggest up to 1600 user per day. The documents suggest minor negative impact to residents exiting and entering driveways on this lane due to increased user volumes. This observation by Fingal County Council is not a true representation of the significant safety risk presented to users and residents by such projections

**Figure 2: Source: Extract from Fingal County Council planning application to An Bord Pleanála - Highlighted anomalies in Section 3**

<p>Section 3 – R106 Dublin Road to <b>§§§§§ Strand</b> and <b>2.5.1 O’Harlon’s Lane</b> is a cul-de-sac with bollards installed mid-way to restrict general through traffic.</p> <p>There are 14 existing entrances onto this section of O’Harlon’s Lane.</p> <p>O’Harlon’s Lane comprises of 140m of 3.5m wide pedestrian, cyclist and vehicular shared street, 110m of 7.5m wide cyclist and vehicular shared street with footpaths on both sides, 100m of 5m wide pedestrian, cyclist and vehicular shared street, driveway entrances to private residential properties at various locations.</p> <p>Broadmeadow Way/§§§§§ Strand 2.0 Scheme Description 2025.2</p> <p><u>Use of</u> the proposed development will be directed along O’Harlon’s Lane as the volume and speed of vehicular traffic at this location is low, due to the residential nature of the road, and narrow road widths.</p> <p><b>2.5.3</b> There are a number of sections where the width available to traffic is restricted by hedge growth from private properties onto the public road. It is proposed to trim such hedges <b>which encroach</b> upon O’Harlon’s Lane to maximise the available width (see Design Drawing 12-160-254 in Appendix 1).</p> <p><b>2.5.4</b> <b>Where the</b> road widens to 7.5m it is proposed to use the existing footpath for pedestrians, and cyclists would share the carriageway with vehicles. <b>Any major civil infrastructure interventions</b> are proposed here and works to this section will include appropriate signage and road markings as required.</p> <p><b>2.5.5</b> It is proposed to resurface the narrow northern part of the lane as there is some damage to the existing road surface here. It is also proposed to install road markings and signage, in accordance with the <b>National Cycle Manual (NTA, June 2011)</b>.</p> <p><b>2.5.6</b> It is proposed to upgrade and realign the junction of O’Harlon’s Lane and <b>§§§§§ Strand</b> (see Design Drawing 12-160-256 in Appendix 1).</p> <p><b>2.5.7</b> The existing junction layout is relatively wide here (13m wide at the narrowest location) with no facilities for pedestrians or cyclists. There are a number of private entrances including the entrance to St. <b>§§§</b> apartments utilising this junction.</p> <p><b>2.5.8</b> The southern kerb line is proposed to be realigned to reduce the carriageway width to 6.5m wide, allow the formation of a new entrance and provide space to construct new pedestrian and cyclist facilities, including a controlled crossing (see Design Drawing 12-160-256 in Appendix 1).</p> <p><b>2.5.9</b> A new controlled crossing will be installed on <b>§§§§§ Strand Road</b> to access the green area on the northern side of <b>§§§§§ Strand Road</b>. It is also proposed to extend the existing car park facilities on the northern side of <b>§§§§§ Strand Road</b>.</p> <p><b>Broadmeadow Way Volume 1: Non-Technical Summary</b></p> <p><b>4.2 Residential and Journey Amenity 4.2.1</b> The proposed greenway will be a very significant positive amenity for both residents of Malahide and for users. Even for non- or infrequent users, there will be</p>	<p>prospective benefits in terms of sense of place and place attachment. Some inconvenience may arise from higher pedestrian levels in the centre of Malahide, especially on summer weekends. However, this can be mitigated through implementation of aspects of the Public Realm Strategy which includes proposals for traffic calming. Some inconvenience will also be placed on local drivers by signalised crossings, namely at the R106 Dublin Road and on Myrtle Road, noting the high level of projected use.</p> <p>However, a proportion of users will arrive via <b>§§§§§ Strand Road</b> and so omit the former crossing. The proposed signalised shuttle system for the railway underbridge here is on-demand and so will introduce only slight delays for drivers. Rather, this arrangement will provide a slight positive impact for drivers, and cyclists, due to the improved safety, including people cycling generally and not specifically for the proposed greenway. The same arrangements apply at <b>Corribilla Cottages Road</b>, together with some realignment of the carriageway and will benefit pedestrians too. These will provide a moderate positive amenity impact for all road users compared with the safety of the existing situation.</p> <p><b>4.2.2</b> O’Harlon’s Lane is a public laneway. There will be an increased flow of pedestrians and cyclists utilising this laneway. It may be perceived that this additional activity may lead to a moderate negative impact by way of inconvenience to vehicle access to private properties in the southern and central sections of the road. However, it may also be said that there will be an amenity benefit by way of direct connection to the proposed greenway and its linkages. An increased level of passive surveillance will also be introduced by the higher level of use of the lane and changes to the junction with <b>§§§§§ Strand</b> to improve access and safety. Signage may also be erected asking users to respect residential privacy. Consequently, as a result an overall neutral residual impact is anticipated here.</p>
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Outlined below are Photographs 1 & 2, showing hedgerows at the southern end of the lane where hedge trimming is proposed. The photographs demonstrate that these hedges are already well maintained and trimmed back regularly by residents.

Photograph 1: Exiting trimmed Hedge at southern end of O'Hanlon's Lane are not consistent with the provision of safe passing width for pedestrians and cyclists



Photograph 2: Exiting trimmed Hedge at southern end of O'Hanlon's Lane are not consistent with the provision of safe passing width for Pedestrians and Cyclists



## 1.2 Compliance with road safety

The Residents Association put forward the design and treatment as set out in the aforementioned Figure 1.2 is not suitable for the proposed use and presents significant safety issues for both residents and proposed users. To address concerns in this regard, the residents conducted a ground survey of O'Hanlon's lane to establish compliance with road safety standards. The survey addresses the following items which require consideration in the proper planning of the proposed Greenway:

- A- Safety at the Southern / Malahide Road End of O'Hanlon's Lane
  - o Dimensions of existing junction and current non-compliance with road design recommendations
  - o Inadequacy of road junction for current traffic
  - o Fire tender and ambulance access
  
- B- Safety at the Northern / Estuary end of O'Hanlon's Lane
  - o Failure of Junction

**Summary observations and conclusions of Survey:**

- 1 Junction at southern end O'Hanlon's Lane to Malahide Road fails in all design criteria and is not suitable to be designated as the official singular access route to the proposed Broadmeadow way. It could by way of improvement contribute as part of a multi-access point approach.
- 2 Junction at northern end of O'Hanlon's Lane has been underestimated in its complexity. It fails as part of the proposed Broadmeadow Way because it is an integral part of a route planned over O'Hanlon's Lane which as defined in 1 above already fails. It also fails in all design criteria when the additional projected users join with the already increased vehicular traffic and pedestrian and cycle traffic. It fails because it incorporates six different blind spots. A new design is required for this junction.
- 3 Traffic circulation in the lane is currently by way of two cul-de-sacs which allow certain safety features in a very restricted area. The addition of designated cycleway traffic in both directions alters these already necessary safety features and establishes two-way through road traffic. The entire circulation fails when considered in this way.

Further details of the survey analysis and findings are outlined in the sections A and B below. Please note, supporting measurements and drawings for survey are contained in appendix I.



**Survey Section A: Safety at the Southern/Malahide Road End of O'Hanlon's Lane:**

**Preposition A1 - The dimensions of existing junction is not compliant with road design recommendations**

Image 1 below is taken from Google Maps to show the existing junction at the Southern/Malahide Road end of O'Hanlon's Lane.

**Image 1: Source: Google Maps showing the existing junction at the Southern/Malahide Road end of O'Hanlon's Lane**

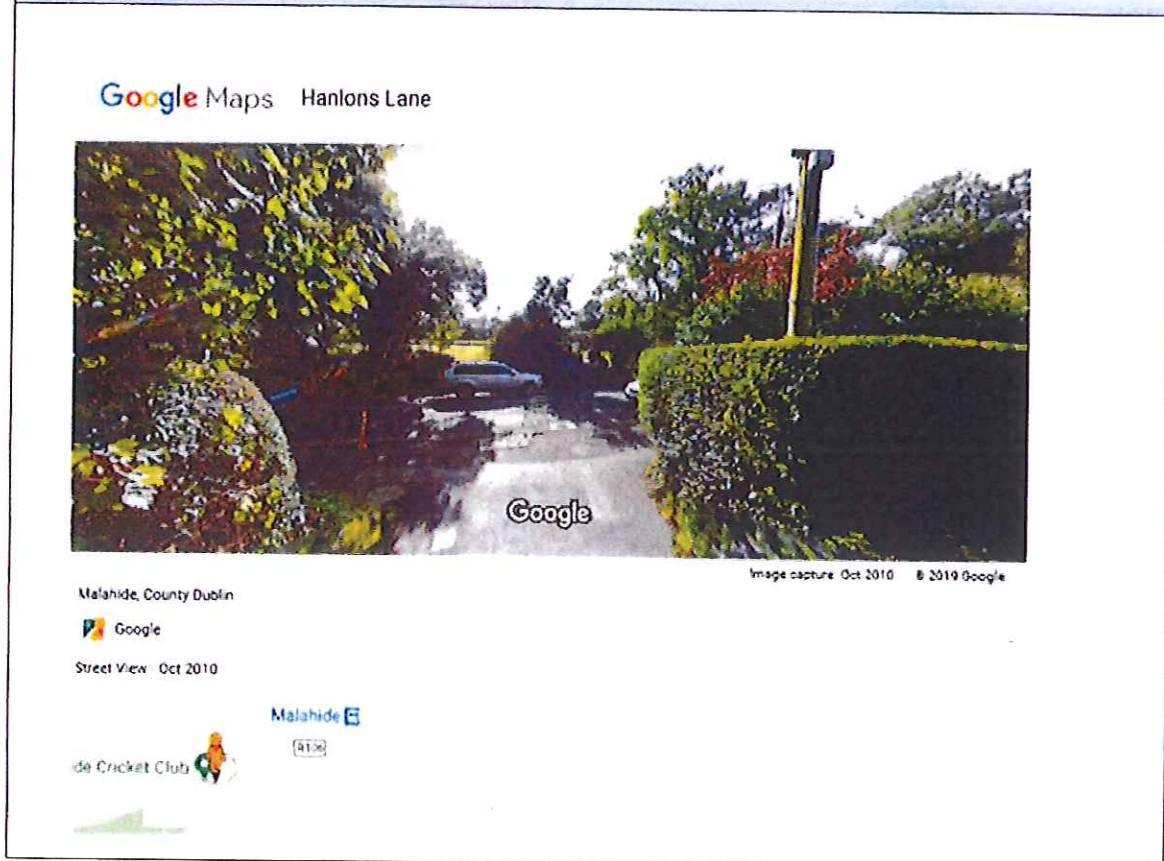


Figure 3 below is taken from the RSA guidelines on road design for junctions where a minor road meets a major road. Also, the extracts give the recommended design sight lines and main road design speeds.

Dimensions of existing junction when considered as minor road to major road in accordance with the IEI design for roads recommendations and the RSA design for geometric junctions recommendations are summarised as:

$$X = 0$$

$$Y = 14$$

$$\text{Width of Minor} = 2500\text{mm}$$

Figure 3: Source: RSA design for geometric junctions recommendations

## 5.6 Geometric Design of Priority Junctions on Single and Dual Carriageway Roads

### 5.6.1 General

This section outlines the geometric design properties and features to be considered in the design of priority junctions and accesses associated with single and dual carriageway roads.

### 5.6.2 Design Speed

Geometric standards for junctions are related to the traffic speed of the major road, and for new roads this is the design speed as defined in DN-GEO-03031.

### 5.6.3 Visibility

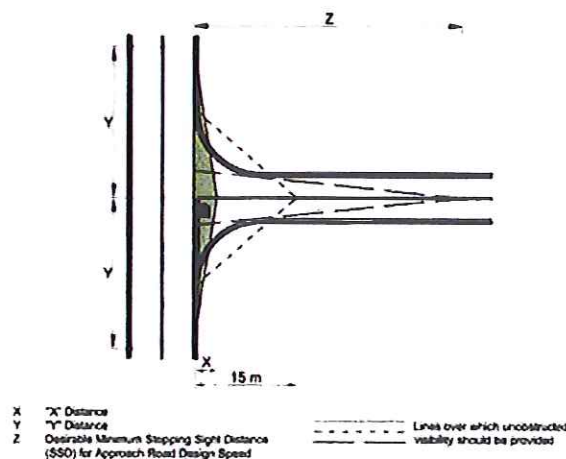
#### 5.6.3.1 General

Traffic from either a minor road or direct access has to join or cross the major road when there are gaps in the major road traffic streams. It is therefore essential that drivers emerging from a minor road or direct access shall have adequate visibility in each direction to see the oncoming major road traffic in sufficient time to permit them to make their manoeuvres safely. The visibility requirement for drivers emerging from a minor road or direct access is to the high object (1.05m) on the major road as defined in DN-GEO-03031. This concept also applies to major road traffic turning right into the minor road or direct access. For Dual Carriageways, egress out of left in/left out junctions and accesses only requires visibility to the right.

#### 5.6.3.2 Minor road/direct access

The required visibility parameters to be determined by the designer for drivers approaching a junction with a single or dual carriageway road from a minor road or direct access are outlined in Figure 5.15a and b.

Figure 5.15a: Visibility Standards (single carriageway)



The existing junction at the southern/Malahide Road end of O'Hanlon's Lane does not meet any of the design requirements for width of a minor road, sight lines for traffic from the minor road, traffic sight lines from the major road to the minor road.

### Proposition A2 - The junction currently fails in traffic management

Currently it is not feasible for two vehicles to pass over the first 35m of road from the Malahide Road end as it descends on a grade of 12% from the top to a point 38m into the lane. This fails road design criteria as indicated by the IEI and RSA guidelines for design of roads. Therefore, the addition of a combined traffic and cycleway over this part of the road is designing in a feature which fails all design criteria and therefore will fail and is hazardous.

There is an element of common sense required in looking at the fact that O'Hanlon's Lane emerges onto a T-junction with the main Malahide road which is heavily trafficked. There is no way to properly protect cyclists or pedestrians exiting into this traffic with potentially fatal consequences. This junction

is completely unsuitable for the proposed combination cycleway with Malahide Castle as the destination.

There is no gateway to Malahide Castle at the top of O'Hanlon's Lane. Therefore, cycle and pedestrian traffic would have to be diverted either left towards the Hogan's Gate entrance or right towards the smaller Yellow Walls Road entrance. In selecting which way to direct cycle and pedestrian traffic, consideration would have to be given to; corralling the cycle traffic either along the northern footpath and adding some sort of safety railings, or by taking part of the main Malahide road as the corralled area and separating the cycle traffic from the main traffic. Neither option is suitable because either the already heavily used footpath will become compromised and dangerous or the roadway will be narrowed to such an extent to cause passing problems with oncoming traffic.

There would also be a requirement for a lift or drop barrier at the edge of the footpath to the top of O'Hanlon's Lane. This would be a multiple user barrier controlled by a telemetric (and likely expensive) operating system, such that the barrier could be disengaged for residential users, visitors, and all service/utility vehicles. The Residents Association put forward that common sense suggests that the T-junction at the top of O'Hanlon's Lane does not work from a separation design criterion.

**Preposition A3 – The Design does not account for Fire Tender, utility, and ambulance access requirements**

O'Hanlon's Lane requires access from both ends for fire tender access as the lower end to the Malahide Estuary end regularly floods to the pinch point of the bend at that end. Therefore, any adjustment of O'Hanlon's Lane for combined cycle and pedestrian traffic access must maintain the ability for fire tender and ambulance to access from the southern/Malahide Road end. It also needs to accommodate utility and service vehicles.

When a delivery truck or service truck of any kind enters the laneway in its current state there is not sufficient room for a pedestrian to pass that vehicle. The width survey of lane (outlined in appendix I) shows that over the first 28m the combined width of roadway/footpath is less than the recommended minimum 3m. The addition of a low number of cyclists (example 5 cycle users) along this section of the lane will cause an impasse. If the cyclists have entered the narrow zone from the northern end and a vehicle enters the lane from the southern end, then the cyclists will have to stop reverse out of the way and possibly lean into hedges to allow the vehicle to pass. For cyclists and pedestrians who are not familiar with the lane this could prove to be extremely dangerous and very likely to cause an accident.

**Figure 4: Source: EuroVelo - European Certification Standards – Width requirements for Category I and Category routes with Motorized traffic**

<i>&gt; 5m (route components with motorized traffic as well as without)</i>	<i>category I</i>
<i>3m - 5m (route components with motorized traffic as well as without)</i>	<i>category II</i>
<i>2 - &lt;3m (usually route components without motorized traffic)</i>	<i>category III</i>
<i>&lt;2m (usually route components without motorized traffic)</i>	<i>category IV</i>

If the route is running on public roads with motorized traffic, the available space will be evaluated in relation to traffic load as well as speed limits.

In designing a suitable management system to cater for current traffic, utilities and deliveries, and the addition of a possible peak flow of cyclists (Example a school tour) consideration should be given to firstly that any such system is a compromise of design criteria because the junction does not work, and secondly in considering the overall economics of the project there may be a better alternative. Suggestion relating to alternative routes are outlined in section 8 of this submission.

Summary of conclusions with respect to safety at the Southern/Malahide Road End of O'Hanlon's Lane are outlined in 1- 5 below:

1. Junction at O'Hanlon's Lane to Malahide Road is currently sub-standard in its current state.
2. The improvement works suggested in the May 2019 study by Fingal County Council will not make the junction functional.
3. The study by Fingal County Council of the junction and the control measures for safety as it relates to the future proposals are insufficient and in fact make an already dangerous junction even more dangerous.
4. The first 30m of O'Hanlon's lane is less than the width of a single lane carriageway and is therefore unsuitable for the proposed combined cycle pedestrian vehicle. This measurement of this section as defined in the width survey (appendix I) falls below the min design criteria of 3500mm. This section has capacity for managed traffic applications. The addition of the proposed Cycleway to this section of the lane would require advanced traffic management and telemetric installations and there are no such proposals put forward by Fingal County Council.
5. There is no realistic or practical design that allows for proper corralling and separation of the cycle traffic to enter and leave Malahide Castle in a safe way, considering the current design criteria from IEI and RSA. The Junction fails in swept path analysis, sight line analysis, width analysis, carriageway separation, cycleway separation and pedestrian separation. The proposed improvements are completely inadequate and fail the criteria as in its current state.

The junction and narrow part of O'Hanlon's Lane being a 35m less than single lane, with its average width as 2760mm section, arriving onto the dual lane Malahide road to a T-junction with no access to the destination, Malahide Castle, is not fit for purpose and is certainly not fit for expanded purpose.

#### **Survey Section B: Safety at the Northern /Estuary end of O'Hanlon's Lane**

**Preposition B1 – The safety aspects of the northerly junction between O'Hanlon's lane, Bissett's Strand, St. Ives and Bissett's Strand Upper causeway are already failing in the design of this junction.**

Image 2 below provides an overview of the northerly junction between O'Hanlon's lane, Bissett's Strand, St. Ives and Bissett's Strand Upper causeway.

Image 2: Source: Google Maps Aerial view of Northerly junction between O'Hanlon's lane, Bissett's Strand, St. Ives and Bissett's Strand Upper causeway



The planning of the junction upgrade as referenced in drg 12-160-256 considers only two roadways when in fact there are four. It also considers the combined walkways as insignificant but there are in fact five combined walkways merging at the junction. The planning also considers this junction as part of a scheme which considers O'Hanlon's Lane as part of the Broadmeadow Way but it has been put forward in Section A of this survey, that the southern end of O'Hanlon's Lane will not work and fails all design criteria.

The National Cycle Manual sets out the requirement to identify the potential conflict per Figure 5 below.

Figure 5: Source: National Cycle Manual - 1.3.1 Identify the Potential Conflict

#### 1.3.1 STEP 1 - Identify the Potential Conflict

Review the junction or situation to identify possible conflict areas for all different modes of transport

Consider in particular:

- What is the "actual" usage pattern of the road as opposed to its Function and Design – especially regarding inappropriate speed, position and direction?
- The individual movements of different modes of transport and how they interact
- Standard hazards such as horizontal and vertical clearances, street furniture etc
- Possible errors of judgement by cyclists and other vulnerable users
- Database of accidents
- Available traffic information (e.g. An Garda Síochána, traffic wardens, control centre operators, etc.)
- Cycleability Audit undertaken jointly with cycle users and stakeholders (e.g. CRISP, Cycle Route Implementation and Stakeholder Plan, from the UK)

Therefore, fundamentally this junction does not work because it is regarded as part of a failed system. It implies that by encouraging the Broadmeadow way traffic into O'Hanlon's Lane then this junction can be made safe. This safety of this junction must be considered as it is, and not part of the proposed Broadmeadow way.

In practical terms O'Hanlon's Lane will be used by cyclists and walkers who are, or get, familiar with its effective short cut to and from the Estuary and Malahide Road. This will have to be accommodated in any event but not by designating the lane as the preferred access route. It is by reason of the obvious

lack of safety standards on the laneway that bollards have been installed in the middle of the laneway to make it two cul-de-sacs rather than a through road and thus mitigate the safety failures.

The current proposal redefines the lane as part of the Broadmeadow Way and comprises the functioning of the cul-de-sac approach, such that it becomes a two-way carriageway. In this way all the design criteria fail.

In examining the junction as part of a strategy whereby O'Hanlon's Lane becomes one of many access routes to and from the proposed Broadmeadow Way, then the following observations as set out in points 1 - 4 below are relevant to the proposed junction.

1. The difference in elevation between the current Bisset's Strand and the upper Bisset's Strand Causeway/pathway is 1.38m measured at the point of the entrance to the junction using a swept analysis design point as the start of the curve. This leads to a blind sight line for motorists approaching in the same direction (i.e. approaching west from Malahide along Bisset's Strand and turning left onto O'Hanlon's Lane or entering St. Ives or turning onto the upper combined pathway/roadway). Residents and regular users have had several near misses in taking this junction.

The problem is further compounded by the height of the hedging at the eastern corner of the junction which rises a further 1.6m. The combined effect of layout, obscuring hedging as the junction becomes busier is a complete failure of the junction using IEI and RSA guidance techniques. The Residents Association put forward that routing high volumes of cycle and pedestrian traffic through this junction will present a very risk of serious accidents.

2. The proposed design locates the Tucan crossing approximately 8m back from the main exit and its position fails to take into account that this junction, despite being small is in fact a five-way junction.

The junction must address each of the five access and egress points and not just the crossing of the Bisset's strand. As the proposal stands the combined roadway cycleway of O'Hanlon's Lane meeting the combined roadways and pathways and entrances make this junction fail in almost all criteria with reference to sight line, swept path particularly from Upper Bisset's Strand Causeway, separation in all directions and creates a new blind spot for emerging cyclists coming eastwards from Bisset's Strand.

3. The elevation of O'Hanlon's Lane to the southern end is +4.9m. with an average slope of 12 degrees. Therefore, when considering the junction, a run off effect must be taken into consideration. This has not been addressed in the current proposal of the junction. An average person on a bike travelling from the southern end of the lane to the northern end and not applying brakes will be travelling at almost 20k/h with a further instant acceleration over the last 10 m of the junction bringing their potential speed to 30km/h. The junction design must include the run off and therefore be extended over the full distance of the junction i.e. 26m incorporated in the junction.

4. The junction at the Northern end of O'Hanlon's Lane needs a safety management design applied to it quickly, regardless of the Broadmeadow way. The current study of the junction by Clifton Scannell Emerson is inadequate and does not take all the criteria into account. This need to be revisited and redesigned.

The Junction fails in its current state and fails in its proposed state.

RSA guidelines	FAIL
IEI Guidelines	FAIL
User Experience	FAIL.

## Section 2 - Risks / Hazards to proposed users and residents

### 2.1 Sight Line Hazards

The consideration of risks / hazards to proposed users and residents are not referenced or suitably addressed in the proposed design. The Residents Association put forward that sight line hazards are not suitably addressed per the standards in the National Cycle Manual, see figure 6 below:

**Figure 6: Source: National Cycle Manual – Section 4.4.1.1 - Designing for the Bicycle Eye Contact**

#### 4.4.1.1 Critical Cycling Issues at Junctions

##### **Merging and splitting**

Merging and splitting facilities that are located close to junctions increase the junction's complexity. They can generate turbulence within the traffic system, and may increase the risk of accidents. While merges and splits are standard design on primary distributor networks, they should generally be avoided in urban areas intended for bicycles.

##### **Side Swipe**

Side swipe can occur with weaving vehicular traffic. Examples include left hand slip lanes, multi-lane one-way systems, merges and splitting, as well as dual entry and dual circulating roundabouts, and can also include poorly designed bus stops and loading facilities.

At low speed, side swipe can result in oblique collisions, generally involving material damage only to the vehicles. However, side swipe may be far more consequential if cyclists are involved in weaving traffic.

Inherently, the appropriate or expected cycle position may not be clear to cyclists or to drivers, resulting in unpredictable, illegible and potentially hazardous situations.

##### **Eye Contact**

Eye contact between cyclists and drivers is essential for the safety of cyclists at junctions. Proper eye contact between cyclists and drivers allows them to communicate their intentions to each other.

Junction layout that preclude or reduce the opportunities for proper eye contact should be avoided. The most common failure is at two-lane entry from side road or roundabouts where the desired line of sight is inevitably obstructed by the vehicle in the outer emerging lane. Equally, at oblique or Y-junctions, the oblique angle will make it very difficult for drivers to see the approaching cyclist.

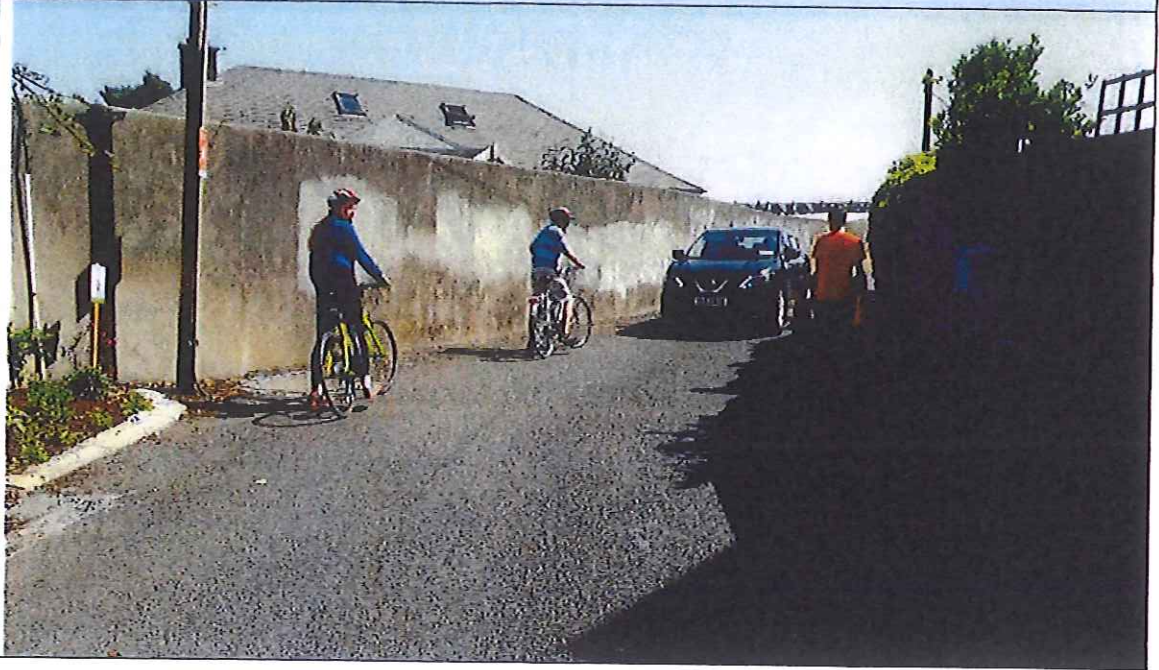
Photographs 3 - 12 below illustrate some potential sight line hazards.

Photograph 3: Safety hazards of HGV and service vehicles at O'Hanlon's Lane southern end

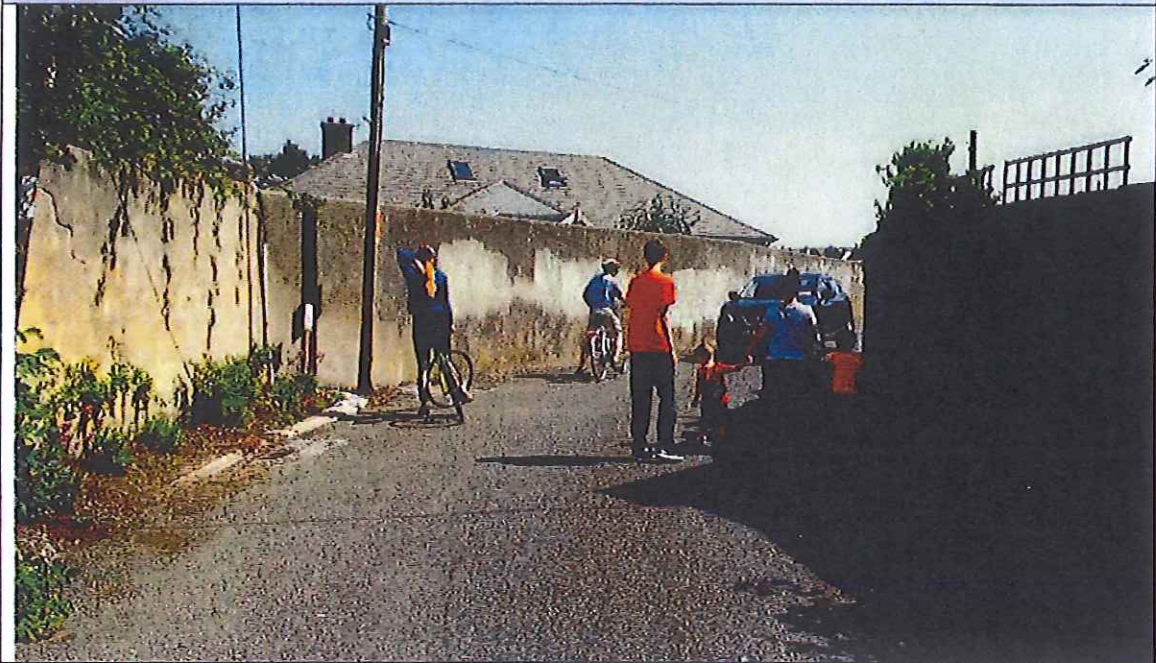




Photograph 4: Hazardous lines of sight into oncoming vehicular traffic for users at O'Hanlon's lane northern end



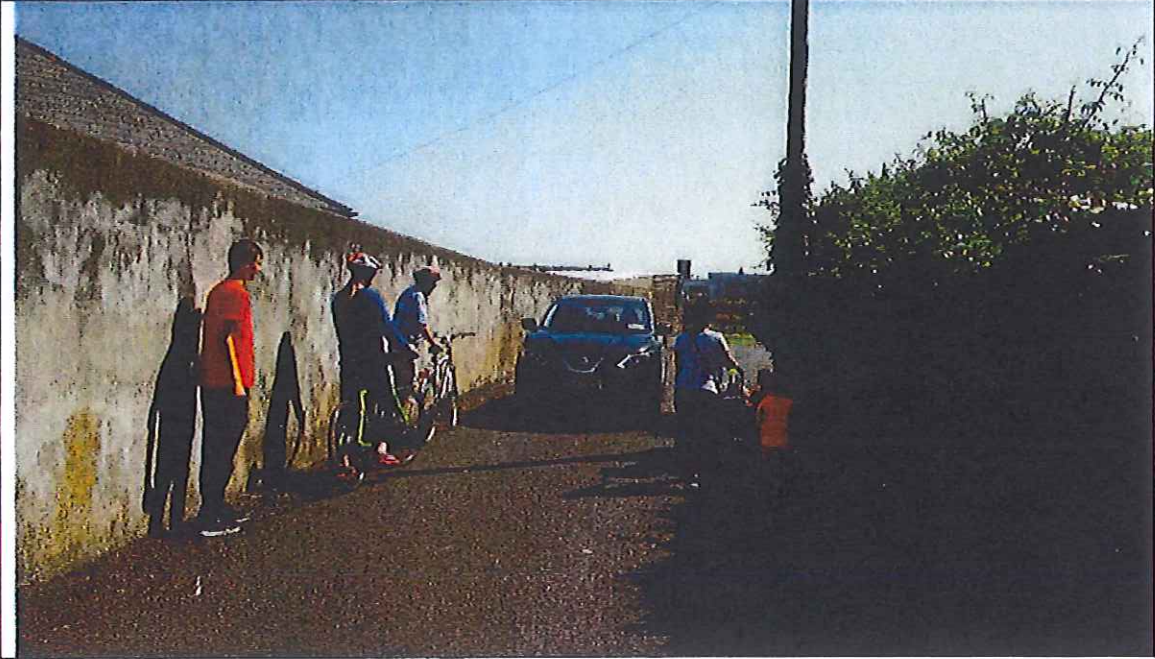
Photograph 5: Hazardous lines of sight into oncoming vehicular traffic for users at O'Hanlon's lane northern end



Photograph 6: High volume of shared use at O'Hanlon's requires users to give way to oncoming vehicular traffic



Photograph 7: High volume of shared use traffic at O'Hanlon's northern end requires users to give way to oncoming vehicular traffic



Photograph 8: Narrow blind 5-way junction at Northern end of O'Hanlon's lane – High concentration of users at this point where an apartment complex exits onto pedestrian footpath



Photograph 9: Narrow blind 5-way junction at Northern end of O'Hanlon's lane – High concentration of users at this point where an apartment complex exits onto pedestrian footpath



Photograph 10: Hazardous lines of sight for vehicular traffic attempting to exit Northern end of O'Hanlon's lane while accommodating cyclist and pedestrian users



Photograph 11: Hazardous lines of sight for vehicular traffic attempting to exit Northern end of O'Hanlon's lane while accommodating cyclist and pedestrian users





Photograph 12: Unsuitable passing distances for vehicular traffic attempting to exit Northern end of O’Hanlon’s lane while accommodating cyclist and pedestrian users



## 2.2 Risk of “Popping Out”

O’Hanlon’s Lane Southern end is lined with mature hedges right to the point it meets the footpath along the Malahide/Dublin Road. There is no opportunity for the projected high volume of cyclists egressing from this end of O’Hanlon’s lane to see / anticipate passing vehicular traffic on the road or pedestrians on the footpath.

This presents a significant risk of “popping out” onto a busy vehicular and pedestrian route. Incorporating such blind spots is not good cycleway design as outlined in per Figure 6 and 7 below

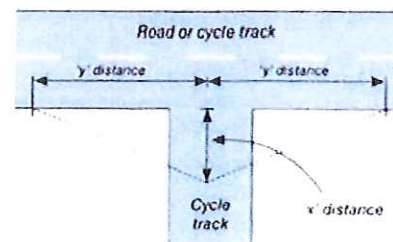
Figure 6: Source: UK Cycleway design Sustrans Design Manual Chapter 1

Recommended Y distances are given in Table 3.7:

Table 3.7 Visibility at Junctions											
85%ile speed (kph)	20	25	30	40	45	50	60	70	85	100	120
y' distance (m) on road	14	18	23	33	39	45	59	120	160	215	295

Source: Manual for Streets TD 42/95

Fig 3.8 Visibility at junctions



Gradients

**Figure 7: Source: National Cycle Manual – Section 4.10.1 – “Pop out of nowhere”**

#### **4.10.1 Principles of Sustainable Safety**

##### **Legibility**

The design should ensure that the bicycle does not “pop out of nowhere” into the middle of traffic, or a pedestrian environment. Rather, the change in direction of the bicycle through the transition must be designed so that it is anticipated and understood by the other road users, as well as the cyclist.

If the transition re-introduces cyclist into a traffic situation, there are two legibility-related requirements:

- physical protection for the cyclist – the cyclist must be physically protected until safely established on their new alignment
- zone of re-establishment between the cyclist and the adjacent traffic - this is a zone for both the cyclist and the traffic to settle into their relative positions after the transition, before any weaving or turning conflict presents itself. This zone should generally be 20m long

If the transition introduces cyclists into a pedestrian situation, it is important that the transition is well-signed (i.e. no surprises for either cyclist or pedestrian), and that it is clear that the pedestrian has priority within the shared environment.

Similarly, the cycle exit from the shared space should also be obvious, especially to the cyclist.

The transition should serve to ensure that the cycling arrangement (especially speed) is compatible with the receiving environment.

### **2.3 Gradient risk to users**

The southern end of O’Hanlon’s lane descends from the Malahide/Dublin Road on a grade of 12% from the top to a point 38M into the lane. This presents an inability of cyclists to stop in a timely manner to avoid hazards such as young child or vehicles egressing from residents’ driveways. This has not been addressed in the design and does not consider the proper design for entrances and driveways as set out in the National Cycle Manual, see Figure 8 below. This risk is particularly pronounced on this 38M sections where there are no footpaths; egress from these properties is directly into the path of cyclists travelling downhill.

**Figure 8: Source: National Cycle Manual – Section 5.4 - Entrances and Driveways**

#### **5.4 ENTRANCES AND DRIVEWAYS**

This sections deals with the proper design of cycle facilities past entrances to private properties.

##### **5.4.1 Design Principles**

###### **Legibility**

The cyclist passing the gate, as with pedestrians, always has priority over access or egress traffic. Specifically, the designer should avoid the use of vehicular aprons.

###### **Functionality**

Entrances should be designed in such a way that vehicles can safely enter and exit the property, without comprising the cycling or pedestrian function. Specifically, the cycle and footpath facility should be continuous across the entrance and not ‘dipped’ at the crossover. This will reinforce the legibility above.

###### **Homogeneity**

Due to the inherent conflict in direction, it is essential that vehicular speeds are minimal when turning in or emerging from a driveway.

#### **2.4 HGV, cars and cyclists in theatre**

The design proposes a shared section for vehicular traffic (including HGVs), cyclists and pedestrians at both the southern and northern ends of O'Hanlon's lane.

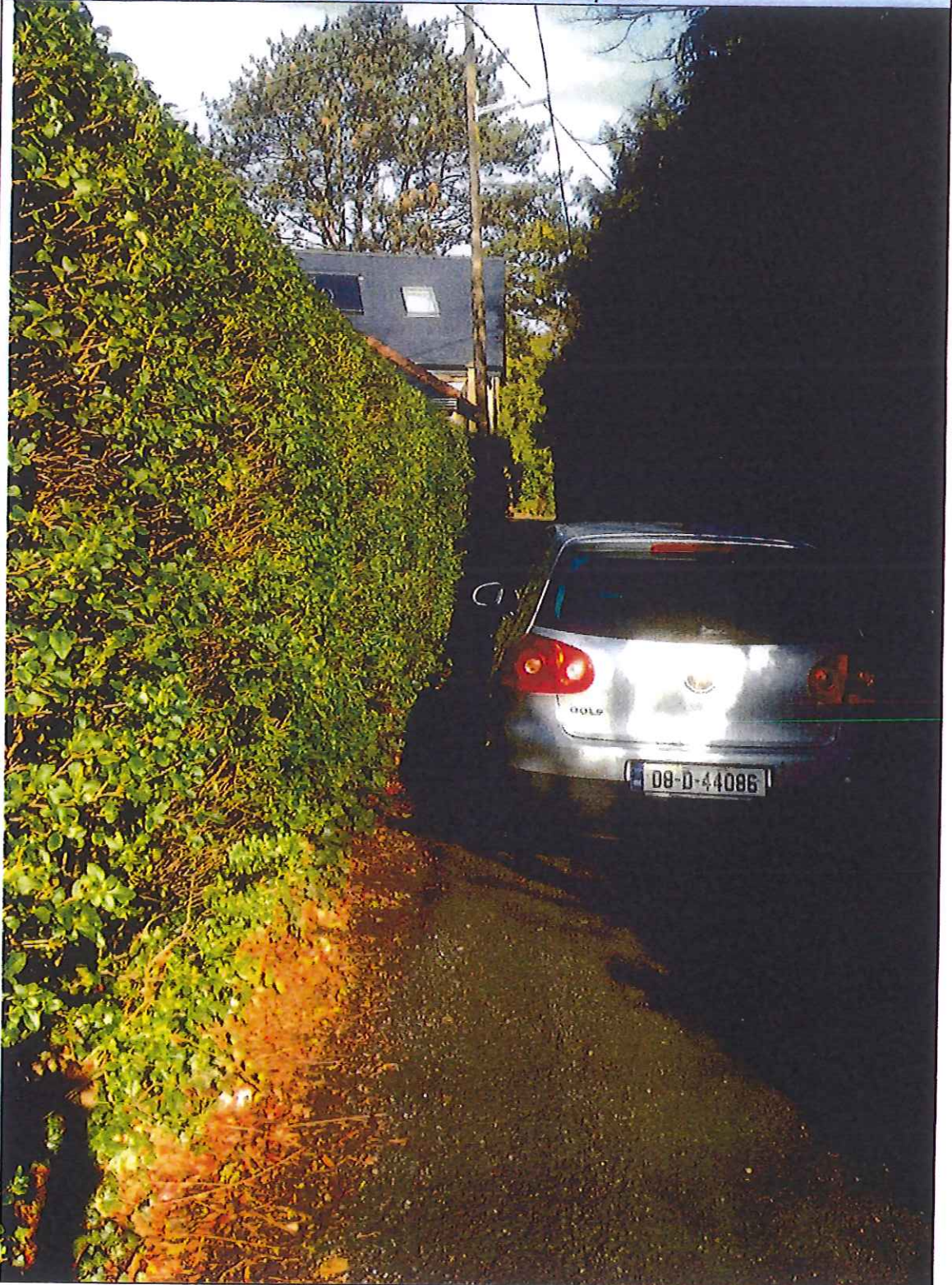
These shared sections present insufficient passing distances resulting in the need for HGVs to reverse through blind corners and vehicular blind spots for cyclists that may be abreast of the HGV. This risk was put forward in the consultative submission by O'Hanlon's residents in 2014 but has not been reasonably addressed in the council's response (refer to Figure 1 above).

Photograph 13 & 14 below illustrates insufficient passing distances. This illustration would be further compounded by oncoming HGV traffic.

Photograph 13: Exiting trimmed Hedge at southern end of O'Hanlon's Lane are not consistent with the provision of safe passing width for Pedestrians and Cyclists



Photograph 14: Exiting trimmed Hedge at southern end of O'Hanlon's Lane are not consistent with the provision of safe passing width for Pedestrians and Cyclists



### Section 3 - Traffic Management Planning

There are projections provided by Fingal Country Council of significant increases in the usage of O'Hanlon Lane by pedestrian and cycle users of up to 1600 users per day.

#### 3.1 Traffic Management Assessment

Scale of projected increase in usage would warrant a comprehensive traffic management assessment and plan. The application does not contain a detailed proposal on how these increased user volumes will be managed in the interest of the safe transit of these users.

#### 3.2 Impact on school children

The application does not reference any consideration given to the impact increased users will have on children attending St Sylvester's infant school. Currently there are several hundred junior school children passing the southern end of the lane each morning and afternoon on schooldays. Image 3 below illustrates the proximity of this School to O'Hanlon's lane.



#### 3.3 Impact on service vehicles

Due to the width restrictions, the lane is not accessible by vehicles of a certain size. For example; reduced sized refuse collections vehicles and deliveries vehicles are required to service the lane. The fact that reduced size vehicles are required for this lane indicates that turning large vehicles on the lane is challenging and presents hazards.

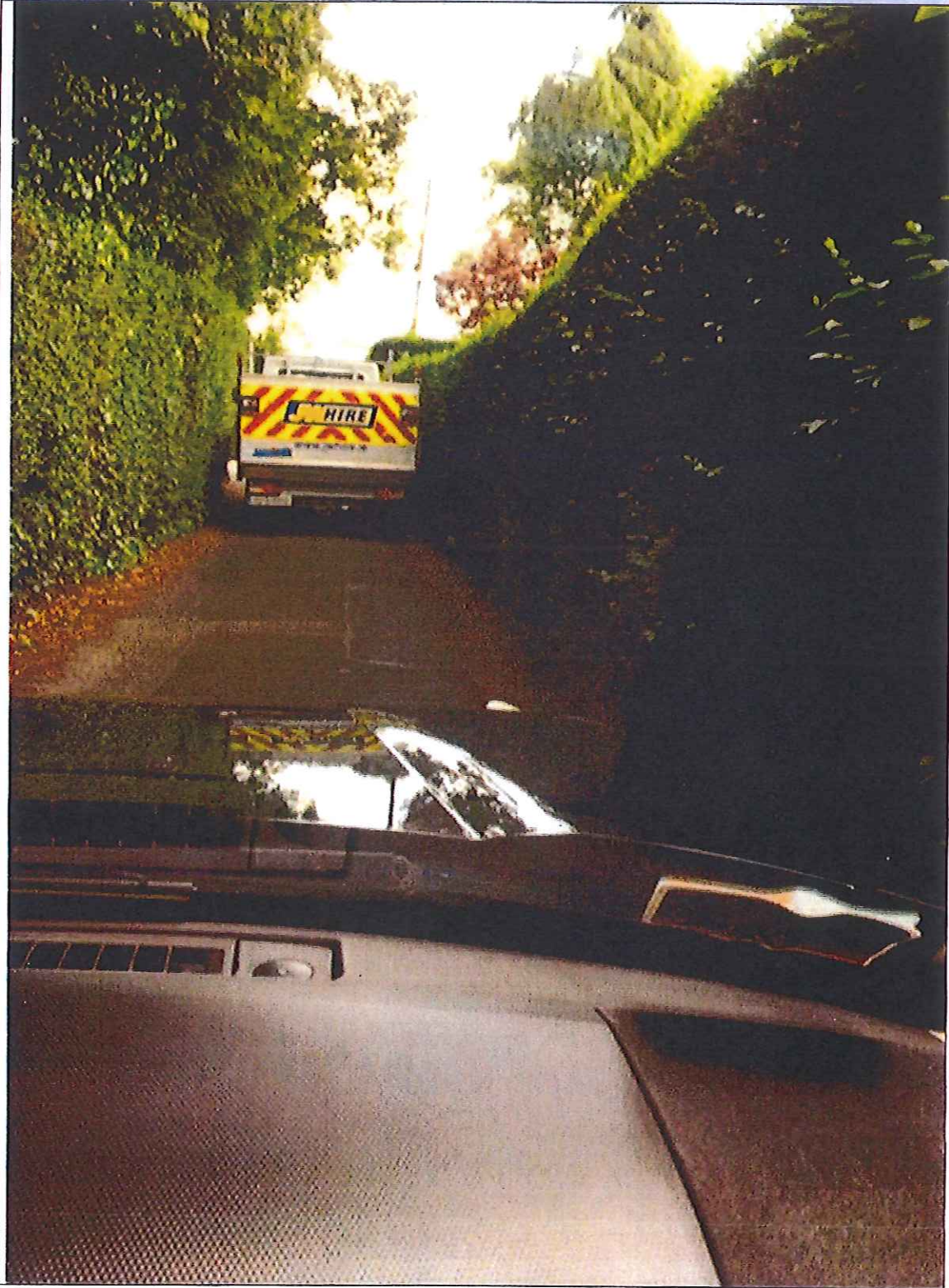
Despite the established constricted nature of the lane there is no traffic management consideration in this design that addresses how these vehicles can continue to service the residents of this lane in theatre with a 1000-fold increase in pedestrians/cyclists.

Photographs 15 & 16 below provide illustrative examples of these challenges that have not been addressed in the design.

Photograph 15: Street parking is an established norm for visitors and those working at or delivering to households on the lane.



Photograph 16: Management of HGV and Service Vehicles at O'Hanlon's Lane southern end





### **3.4 Traffic management and planning decisions**

The proposed increased volume of users is not consistent with previous decision by Fingal County Council with respect to planning applications. Several planning applications by residents of the lane have been rejected or had conditions placed on them on the grounds that the lane is not suitable for increased traffic volumes.

### **3.5 Delays/Tailbacks**

Traffic management (controlled signals) at Bissett's strand and Dublin Road will cause significant delays/tailbacks to commuter traffic accessing Malahide village and will present challenges to residents entering and exiting drives along this section of the proposed route.

#### 4.0 - Consideration of Greenway design standards

The design of the Greenway does not follow the best practice Greenway design principles as laid out in either EuroVelo or Irish Cycle Manual

#### 4.1 Clarity on nature of amenity being proposed

The Residents Association put forward that the categorisation of the Cycle Way/Cycle trail/Greenway being proposed by Fingal County Council is not clear as several of these terms are referenced in the original proposal, See Figure 9 below comparing the proposed text to the National Cycle Manual.

**Figure 9: Source: National Cycle Manual – Section 4.3.6 - Designing for the Bicycle Cycleways. There are inconsistencies with language in proposal by Fingal County Council (terms Greenway, Cycle Trail, Cycle Ways are all used)**

<p><b>4.3.6 Cycle Trails</b></p> <p><b>Typical Road Environments</b></p> <ul style="list-style-type: none"> <li>• Access roads, quiet streets in town centres, speed 30km/h or less</li> </ul> <p><b>Characteristics</b></p> <ul style="list-style-type: none"> <li>• Short streets</li> <li>• Low parking and loading demand on the contra flow side of the street</li> <li>• 24 hour by nature</li> <li>• Mandatory</li> </ul> <p><b>Key Issues to be Considered</b></p> <ul style="list-style-type: none"> <li>• Legibility and signage – other users can read and respect the cycle facility</li> <li>• Detail design of junctions</li> <li>• Ensure continuity and coherence, no gaps</li> <li>• Not suitable for areas with kerbside loading and parking</li> </ul> <p><b>4.3.7 Cycle Ways</b></p> <p><b>Typical Road Environments</b></p> <ul style="list-style-type: none"> <li>• Roads for cyclists through parks</li> <li>• Off-road short cuts</li> </ul> <p><b>Characteristics</b></p> <ul style="list-style-type: none"> <li>• Few intersections with roadways</li> <li>• High comfort levels due to absence of motorized traffic</li> <li>• Crossings rather than junctions</li> <li>• Combined utilitarian and leisure uses</li> </ul> <p><b>Key Issues to be Considered</b></p> <ul style="list-style-type: none"> <li>• Need for compliance with Section 68 of Roads Act, 1993</li> <li>• Need for good visibility and lighting</li> <li>• Where frequent use by pedestrians is likely, consider raised adjacent footpaths and/or reducing speed differential through cycle calming</li> <li>• Consistent quality with dedicated cycle signposting</li> <li>• Crossing points and intersections</li> </ul>	
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#### 4.2 Definitions of Cycleways

Figures 10 to 12 below provide definitions of Greenway. The design of Section 3 of the proposed Broadmeadow way is not consistent with the requirement set out in these definitions.


**Figure 10: Source: Section 68 of the Roads Act 1993 – Definition of a Cycleway**

<p>68.—(1) In this section, "cycleway" means a public road or proposed public road reserved for the exclusive use of pediclers, cyclists, cycle rickshaws and pedestrians.</p> <p>(2) (a) A road authority may construct or otherwise provide and maintain a cycleway.</p> <p>(b) Where a road authority constructs or otherwise provides a cycleway it shall by order declare either—</p> <ol style="list-style-type: none"> <li>that the cycleway is for the exclusive use of pediclers, cyclists;</li> <li>that the cycleway is for the exclusive use of pediclers, cyclists and pedestrians.</li> </ol> <p>(3) A cycleway which is a cycleway for the purpose of this section shall be constructed, maintained and used in accordance with the provisions of this section.</p>
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**Figure 11: Source: Greenways and Cycle Routes Ancillary Infrastructure Guidelines - Definition of Greenway**

The purpose of these guidelines is to:

1. Support the development and enhancement of Greenways and other cycle Routes by identifying and sharing ancillary infrastructure best practice amongst Route designers;
2. Ensure Route designers provide a pleasant, coherent, and consistent Route user experience.



### 1.1 Definitions

**Greenway** is a route section exclusively dedicated to pedestrians, skaters, cyclists and all other non-motorized traffic with a special legal status in France, Spain, the UK and Belgium. Signalisation indicates to users that the section in question is dedicated exclusively to non-motorists.

**Cycle Route** is a route section exclusively dedicated to cyclists with a special legal status in France, Spain, the UK and Belgium. Signalisation indicates to users that the section in question is dedicated exclusively to cyclists.

Source: Greenways and Cycle Routes Ancillary Infrastructure Guidelines - Definition of Greenway

**Figure 12: Source: EuroVelo - European Certification Standards - Definition of Greenway**

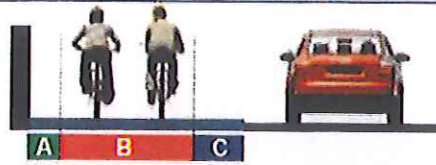
### 2.2.7 Greenways














Greenways are route sections exclusively dedicated to pedestrians, skaters, cyclists and all other non-motorized traffic with a special legal status in France, Spain, the UK and Belgium. Signalisation indicates to users that the section in question is dedicated exclusively to non-motorists.

### 4.3 Passing Distances

The design of the proposed Broadmeadow way does not meet to the best practice passing distances standards for each of the following; shared lanes, accommodating HGVs, near schools and uphill, as outlined in Figures 13 to 16 below.




Figure 13: Source: National Cycle Manual – Cycle Distance Requirements



A Inside Edge	B Cycling Regime	C Outside Edge	D Additional Features
Kerb  0.25m	Single File  0.75m	50gph, 3.0m wide lane  0.50m	Uphill 0.25m Sharp bends 0.25m
Channel Gully  0.25m	Single File + Overtaking Partially using next lane  1.25m	50gph, 3.0m wide lane  0.75m	Cyclist stacking Stopping and starting 0.50m
Wall, Fence or Crash Barrier  0.65m	Basic two Way  1.75m	Raised kerb, dropped kerb or physical barrier  0.50m	Around primary schools, interchanges, or for larger tourist bikes 0.25m
Poles or Bollards  0.50m	Single File + Overtaking Partially using next lane  2.00m	Kerb to regulation of the cycleway  0.25m	Eye strikes, loading line of parked cars (min 0.8m) 1.00m
	2 At least + overtaking Bikes and cycleways  2.50m		Turning pocket cyclists 0.50m

**Example**

To determine required cycle width, select the appropriate Inside Edge, Cycling Regime, Outside Edge and any Additional Features

Channel Gully  0.25m	Single File + Overtaking Partially using next lane  1.25m	50gph, 3.0m wide lane  0.75m	Around primary schools, interchanges, or for larger tourist bikes 0.25m
---------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------

- 0.25m
- + 1.25m
- + 0.75m
- + 0.25m

**Required width**

**= 2.50m**

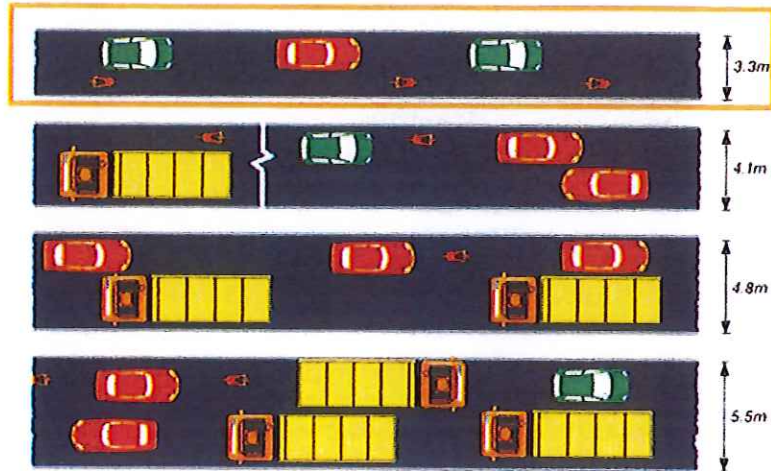
Note: This is the maximum width for an on-road cycle lane. Cycle tracks can be wider

Figure 14: Source: UK Cycleway design Sustrans Design Manual Chapter 1 – A shared lane width of at least 3.3M is suggested. This width distance is not available at the southern end of O'Hanlon's lane.

7.13

Figure 2.2, adapted from Manual for Streets, provides an indication of what various carriageway widths can accommodate at low speeds (though not necessarily recommendations) and Figure 2.3, taken from the Cardiff Cycling Design Guide, provides guidance on the size of vehicles that various traffic lane widths can accommodate. Further guidance on traffic lane widths is given in Manual for Streets 2.

Figure 2.2 Indicative carriageway widths for various traffic compositions at low speed (adapted from Manual for Streets)



**Figure 15: Source: UK Cycleway design Sustrans Design Manual Chapter 1 - Passing Distances for HGV**

Table 3.2 Overtaking by motor vehicles	
Minimum passing distance from cyclist's dynamic envelope	
20mph	1m
30mph	1.5 m

- on steep gradients where cyclists travelling uphill may wobble and need to overtake each other and where downhill cycle speeds are high.

3.7

Where a cyclist is overtaken by a motor vehicle drivers often pass more closely than is comfortable. Minimum recommended passing distances are dependent on vehicle speed, as shown in Table 3.2.

3.8

To achieve these clearances, the total minimum width required can be calculated as shown in Table 3.3. The widths required for a car or HGV to overtake a cyclist in secondary riding position are shown in Figure 3.4 and Table 3.4

**Fig 3.4 Width required for car/HGV at 20mph/30mph to overtake a cyclist in secondary riding position**

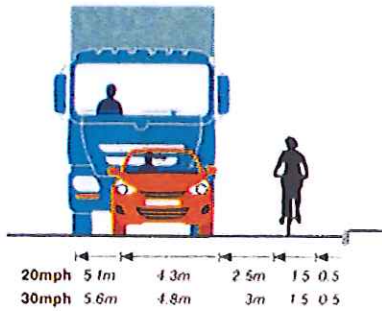
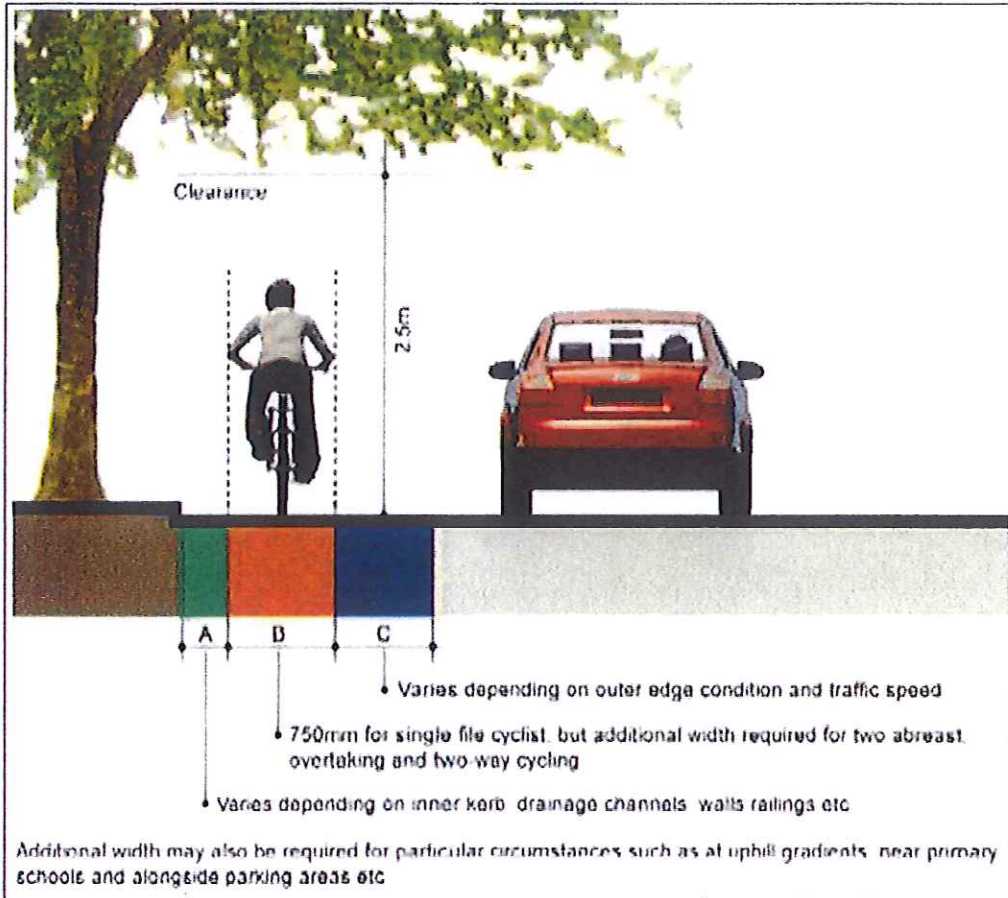


Table 3.3 Calculation of minimum width required: minimum width = a+b+c+d	
a	dynamic width
b	minimum passing distance from other users (Table 3.2)
c	clearance for edge constraints (Table 3.1)
d	additional width for high cycle/pedestrian volumes, steep gradients, curves

Table 3.4 Total width required for overtaking	
Car passing at 20 mph	4.3m
Car passing at 30 mph	4.8m
Bus/HGV passing at 20 mph	5.1m
Bus/HGV passing at 30 mph	5.6m

Figure 16: Source: National Cycle Manual – Additional width recommended in vicinity of schools and uphill. These considerations should be applied for the design of the southern end of O’Hanlon’s Lane



#### 4.4 Greenway Branding

"Greenway" is referenced in the proposal by Fingal County Council. The "Greenway" brand carries a standard that encourages tourist to engage with such tourist amenities. However, if the design is not in compliance with Greenway requirements it is not clear if and how Fingal County Council can access this brand.

Figures 17 to 19 below outline the required design standards for use of the "Greenway" brand.

Figure 17: Source: Irish Trails - Design and brand guidelines - Definition of a Greenway

## Definition of a Greenway

A Greenway is a recreational or pedestrian corridor exclusively for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. These routes should meet satisfactory standards of width, gradient and surface condition to ensure that they are both user friendly and low risk for users of all abilities.

Figure 18: Source: Irish Trails - Design and brand guidelines – Greenway brand mark may not be permitted as the proposed development does not qualify as a Greenway under the definition set out by Irish Trails.

Greenway brand mark  
(for use within Ireland)

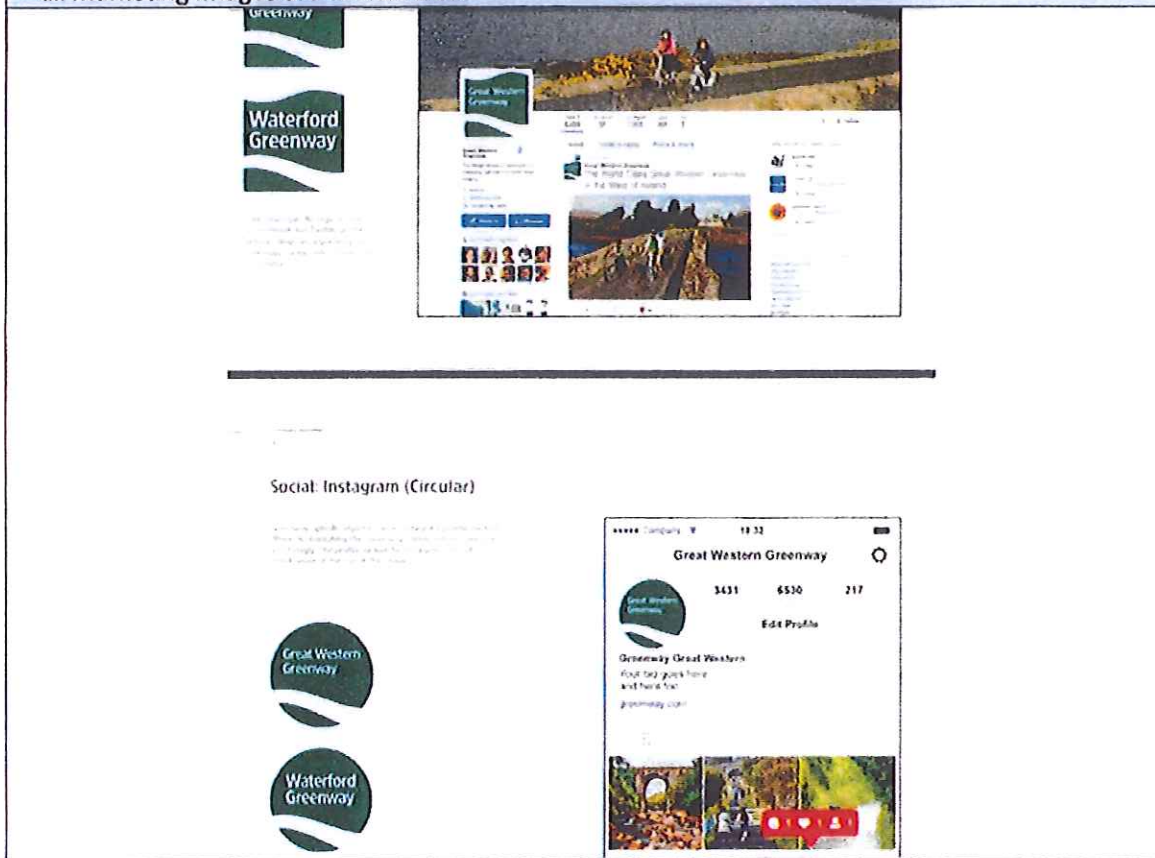


Greenways Ireland brand mark  
(for use internationally)





Figure 19: Source: Irish Trails - Design and brand guidelines – Marketing on other national Greenways is not consistent with users negotiating oncoming vehicular traffic on narrow laneways – all Marketing images are vehicle free.



## **5.0 - Boundary Treatments**

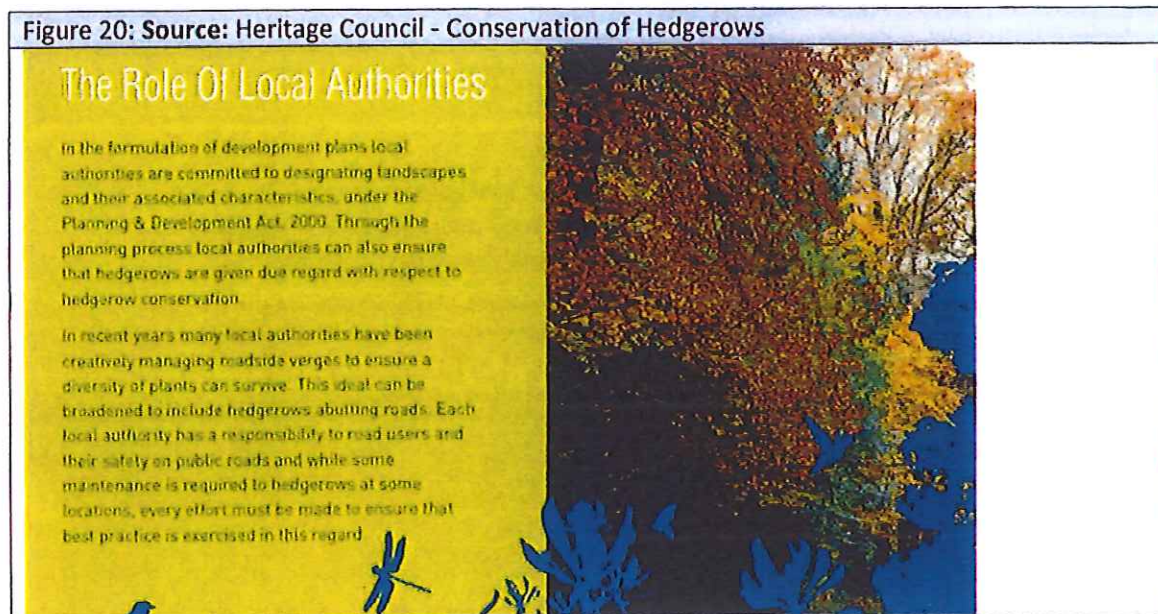
Due to the restricted nature of the design at the southern end of the lane, users may inadvertently enter on to the property of residents at narrow sections of shared usage. This may present associated issues of consent, trespass and liability.

Proposed widening of the southern section includes the trimming back of boundary hedges with no prior consultation with households that maintain these boundary hedges with respect to how these boundaries will be affected.

## 6.0 - Protection of flora and fauna

O'Hanlon's Lane has attractive mature hedge-lining along the southern end and at least one protected pine tree planted by the Talbot family estate. These natural environments have been maintained by residents of O'Hanlon's Lane. Fingal County Council has not played an active role in the maintenance and care for these environmental elements. These trees and hedges are rich with native bird, animal and insect life.

The Heritage Council sets out that local authorities are committed to the conservation of hedgerows per Figure 20 below.



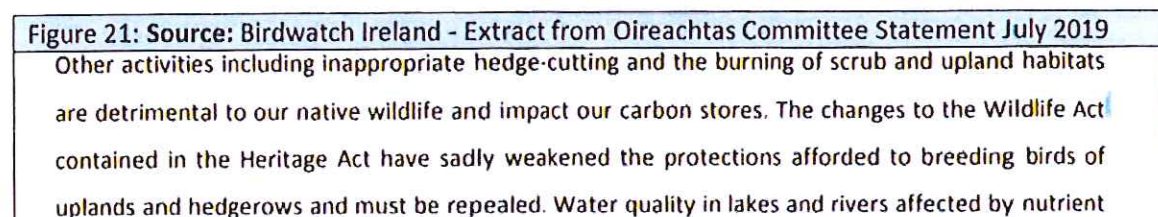
## 6.1 Removal of habitat

The design proposes that hedges will be trimmed at the southern end of the lane. The hedges in this section of the lane are already trimmed and are well maintained by residents.

There is a concern by the Residents Association that more aggressive cutting back of these hedges may take place. Any aggressive cutting back of these hedges would upset the natural urban habitat and biodiversity of birds, foxes, squirrels, Bees and insects.

There is further concern that the projected volume of users entering the lane will cause noise and significant encroachment into these natural urban habitats and upset the natural biodiversity currently present.

In a recent submission to the houses of the Oireachtas Birdwatch Ireland advocated strongly against inappropriate hedge-cutting, see figure 21 below.



The northern end of the lane has a designated pollination site for bees and other pollinators. This is a Malahide community initiative. This habitat is at risk by the prospect of significant encroachment from 1600 users passing this site in any one day.

## 6.2 Conservation

The design for this section of the Broadmeadow way is not consistent with Fingal County Council's heritage development plan or biodiversity programmes as outlined in Figures 22 to 24 below.

Figure 22: Source: Fingal County Council Development Plan 2017 - 2023 - Heritage Chapter - Statement of Policy

### Statement of Policy

- Conserve and enhance the County's biodiversity
- Conserve and enhance the County's geological heritage
- Promote a unified approach to landscape planning and management, provide an understanding of Fingal's landscape in terms of its inherent and unique character and ensure that Fingal's landscape is appropriately protected, managed and planned
- Protect, enhance and sustainably manage the coastline and its natural resources

Figure 23: Source: Fingal County Council Development Plan 2017 - 2023 - Heritage Chapter - Objectives 7 and 8


#### Objective NH07

Support the National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, in the maintenance and, as appropriate, the achievement of favourable conservation status for the habitats and species in Fingal to which the Habitats Directive applies.


#### Objective NH08

Ensure that the Council takes full account of the requirements of the Habitats and Birds Directives, as they apply both within and without European Sites in the performance of its functions.

Figure 24: Source: Fingal Biodiversity Programme – Outlines the local authority's commitment to the enhancement and protection of natural habitats.



**FINGAL**  
BIODIVERSITY  
PROGRAMME



## What is Biodiversity?

HOME
**WHAT IS BIODIVERSITY?**
PROJECTS
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### WHAT ARE THE THREATS TO BIODIVERSITY IN FINGAL?

**What is Biodiversity?**

**What are the Threats to Biodiversity in Fingal?**

**From Rio to Fingal**

**The Fingal Biodiversity Programme**

**The Fingal Biodiversity Action Plan**



While we all welcome a thriving economy, we must acknowledge the pressure that increased construction, transportation and changing agricultural practices have put on Fingal's natural environment.

**Habitat Loss**  
Habitat loss is the single biggest threat to habitats and its associated plant and animal species in County Fingal. The last decade has seen a major increase in the population in Fingal. The required houses, roads and sewage infrastructure have led to a major loss and degradation of habitats. Streams were straightened and culverted, trees and hedgerows removed and wildflower meadows dug up. In the countryside, many hedgerows, wetlands and ditches have also been removed to improve the land for agriculture.

All these developments have led to a net loss of good quality habitats and a decline of plant and animal species.

**Invasive Species**  
Another more recent threat is the spread of invasive species in Fingal. These are plants and animals that 'escape' from your garden, or are brought in from foreign countries and are out-competing native Irish species. Plants such as Cherry Laurel, Rhododendrons, Sea-Buckthorn, Japanese Knotweed and Hottentot Fig can be found at several sites in Fingal where they completely dominate the area. Red squirrels are only found in Houth these days, as their American cousin the Grey Squirrel has taken over most other woodlands in the County.

The Fingal Biodiversity Programme aims to restore, protect and enhance the natural habitats and its species in the County and address problems such as invasive species.

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## **7.0 - Preservation of the character and aesthetics of the lane**

O'Hanlon's Lane is a quaint laneway that joins a busy access road for Malahide Village with the recreation of the estuary. It is the only remaining road in the central environs of Malahide with no road markings or significant parking restrictions. It has sparse road lighting. It has attractive mature hedge lining to its southern boundary.

The proposed use as set out in Fingal County Council's submission does not adequately consider the negative impact of

- Increased noise levels for existing users
- The erosion of the character of the lane by the imposition of markings/lining on the street and introduction of new road signage
- Enhanced lighting for the safety of users will impact on the current rural character which is a remnant of this traditional Fingal fishing village

The Resident Association put forward that these are character elements to the village of Malahide that should be preserved. To lose these environmental aspects in the interest of transiting tourists between Malahide Castle and Newbridge Demesne defeats the purpose of providing a characterful and enjoyable cycle-way.

## 8.0 - Parking considerations

Several of the properties along O'Hanlon's lane do not have driveways to cater for visitor parking or trades / delivery vehicles. Street parking is an established norm for visitors and those working at or delivering to households on the lane.

The design does not cater for the parking needs of the residents with respect to visitor parking or parking for trades / delivery vehicles.

Photograph 17: Street parking is an established norm for visitors and those working at or delivering to households on the lane.



## **9.0 – Assessment of alternative routes**

The Residents Association put forward that the proposed route fails on the following points:

- Does not arrive directly into Malahide Castle
- It takes trader traffic away from Malahide village
- Best practice principles of segregating cycle/pedestrians from vehicular traffic
- Does not incorporate users alighting from Malahide train station that wish to access the trail

The Residents Association put forward that the Broadmeadow Way should be considered as part of a comprehensive town plan for the whole of the Malahide area and should not be considered in isolation. The impact of all the current tourist attractions and the future attractions should be considered together for proper town planning.

The new Broadmeadow Way is intended to link the three great stately homes of Malahide Castle, Newbridge House and Ardgillan Castle. This is a world class tourism idea and should be treated as such. Outlined below is a set of design suggestions put forward for consideration:

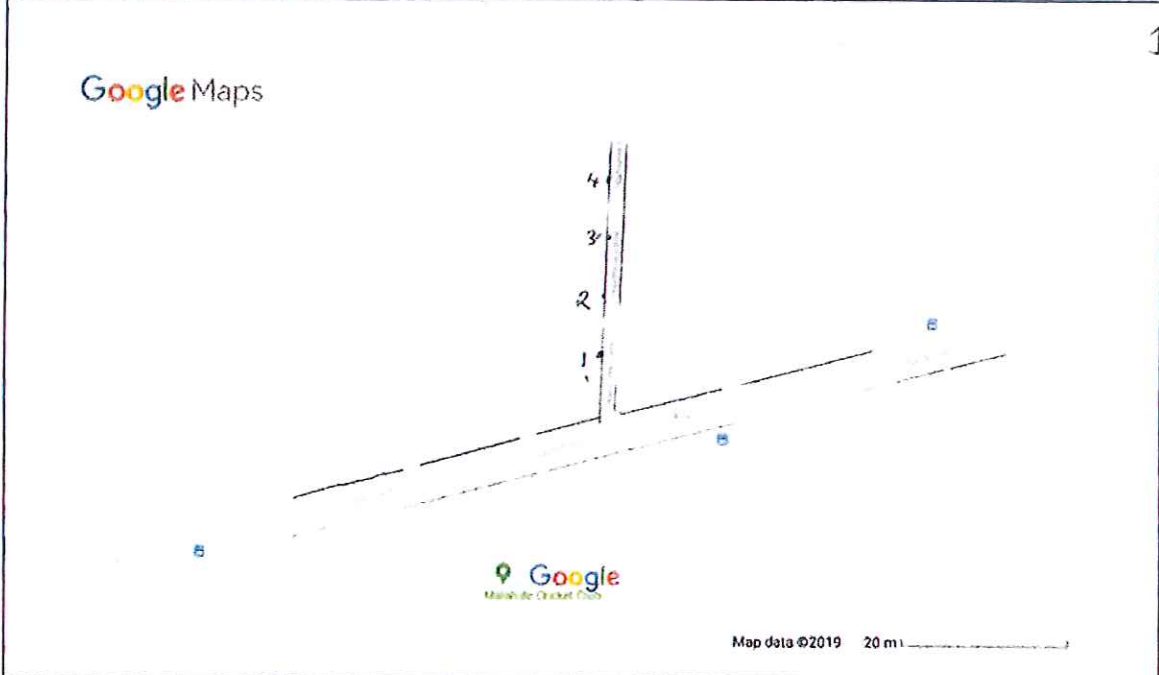
- The Broadmeadow way should arrive directly into Malahide Castle. This could be achieved by combining some of the other needs of Malahide into the plan.
- The current Bridgefield carpark could be excavated down two levels to form a car/coach park. Bridgefield pitches could be fully restored.
- Over the lower levels a smaller footprint multi storey carpark could be built to give two level of car park and most importantly at the third level a designated staging point for the new Broadmeadow Way with facilities such as a bike lock-up, repair area, bike hire facility and additional tourist facilities.
- This could all be designed in a modern building, complimenting the village and the new Fry Model Railway.
- From this third level position a new pedestrian/cycle bridge could be designed to span over the Malahide road over parts of the current railway station yard, over the space that exists along the side of the railway and eventually down to the lower level of the proposed cycleway approximately 100m out into the existing estuary.
- People arriving on the greenway could then leave their bikes and walk to access the village or the castle of the fry railway.
- This eliminates the need for all of the work on junctions that do not work and provides the basis of a true world class facility. It would become an actual destination tourist attraction in line with the already superb attractions of Malahide.
- Coaches bringing school tours and weekend travellers with their cars could be easily accommodated.
- The economic and social value and the elimination of potentially fatal safety risks at under designed junctions far outweighs any cost outlay arguments.
- A new underpass could be easily constructed under the existing railway approximately 200m out into the estuary to utilise the existing roadway through the council yard at Bisset's Strand as a secondary access to Malahide village. This eliminates the need for an elaborate timed junction at the current low railway bridge.
- Traffic from Swords direction could continue to use Estuary Road onto Strand Road to access the village.
- Traffic from the Portmarnock direction could continue to use Townyard Lane and New Street to access the village



- Traffic from Church Road could continue down New Street to access the village
- Traffic from Dublin could approach on the Malahide road and use a combination of all of the available routes to access the village
- All of the routes including O'Hanlon's Lane could adjust to the additional use of the combined cycleway
- All of the routes could be restricted to residential parking and thus improve the safety and all of them with simple signage and road markings could collectively share the increased traffic burden without any of them being designated.

### Appendix I – Ground Survey of O’Hanlon’s Lane

#### Ground Survey Section 1 - Southern / Malahide Road End of ‘O Hanlon’s Lane



Road Width	Dimension (mm)	Photograph Reference
1	2500	A
2	2400	A
3	2830	A
4	3110	B

#### Photo A



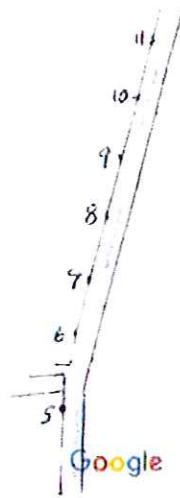
#### Photo B



Ground Survey Section 2 - Southern / Malahide Road End of 'O Hanlon's Lane

2

Google Maps



Map data ©2019 20 m

Road Width	Dimension (mm)	Photograph Reference
5	3325	B
6	2920	B
7	3000	B
8	3950	C
9	4945	C
10	4900	C
11	6870	C

Photo B



Malahide, County Dublin

Google

Street View - Oct 2013



Photo C



Malahide, County Dublin

Google

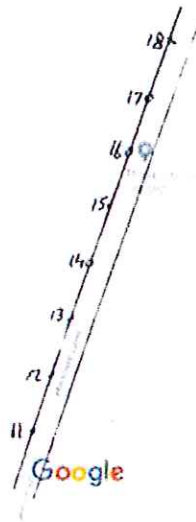
Street View - Oct 2013



Ground Survey Section 3 – Southern / Malahide Road End of 'O Hanlon's Lane

3

Google Maps



Map data ©2019 20 m

Road Width	Dimension (mm)	Photograph Reference
12	6520	C
13	6410	C
14	6710	C
15	7120	C
16	7460	C
17	7520	C
18	7780	C

Photo C

Google Maps 4 Hanlons Lane



Malahide, County Dublin

Image capture Oct 2016 © 2019 Google

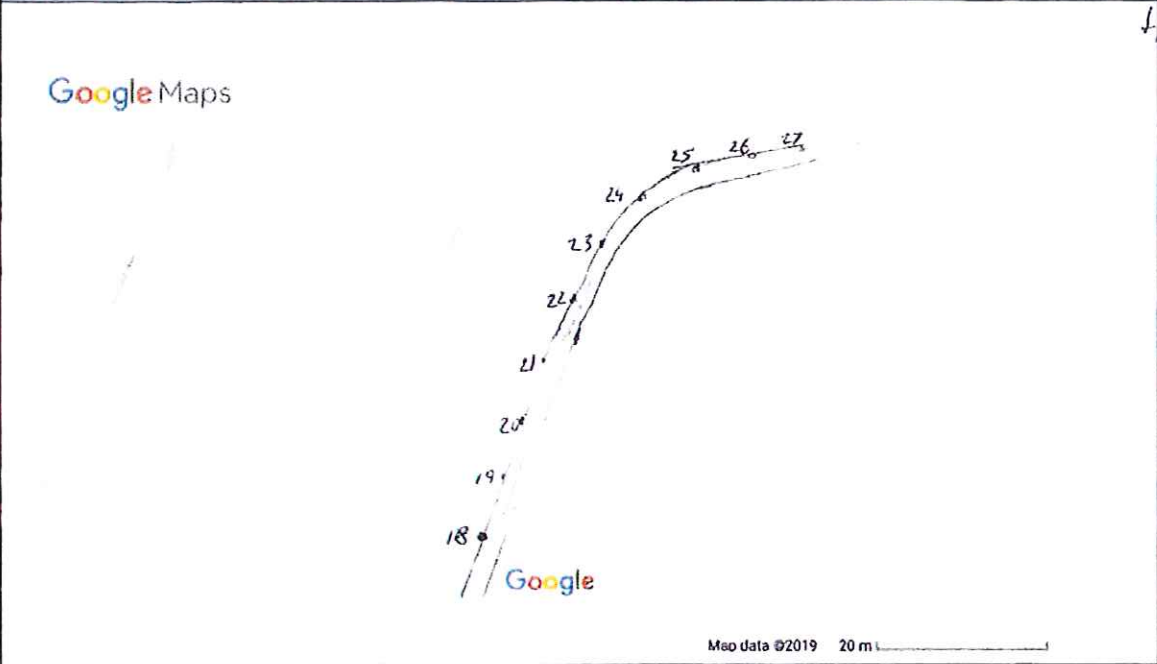
Google

Street View Oct 2016

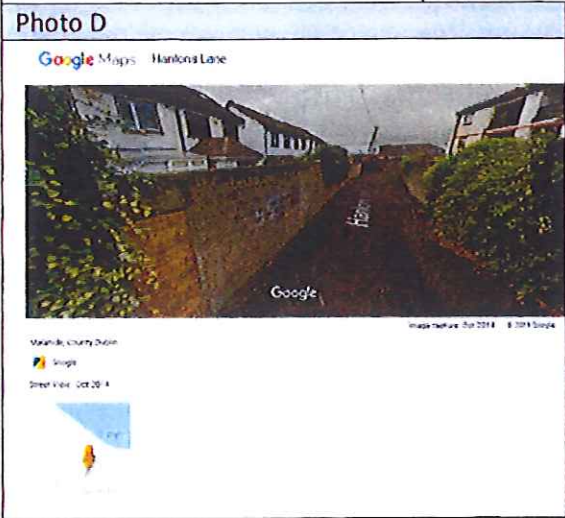


© 2019 Google

Ground Survey Section 4 – Northern / Bisset's Strand End of 'O Hanlon's Lane



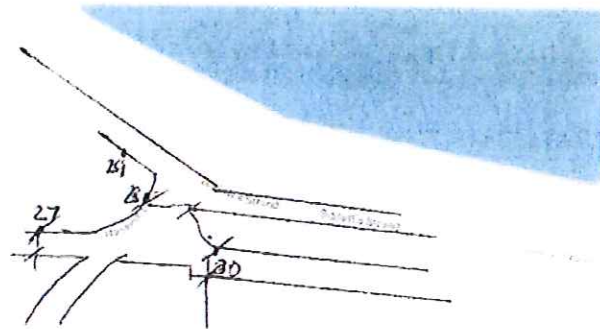
Road Width	Dimension (mm)	Photograph Reference
19	6000	D
20	6560	D
21	5270	D
22	4415	D
23	4935	D
24	5950	E
25	5640	E
26	5560	E



Ground Survey Section 5 – Northern / Bisset's Strand End of 'O Hanlon's Lane

5

Google Maps



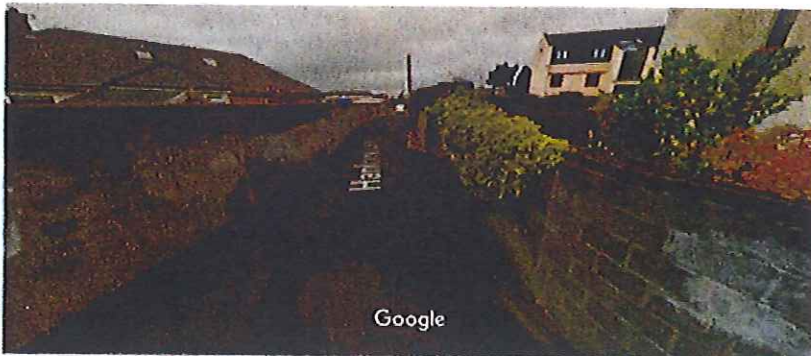
Google

Map data ©2019 20 m

Road Width	Dimension (mm)	Photograph Reference
27	5150	F
28	11240	F
29	----	F
30	5750	F

Photo F

Google Maps Hanlons Lane



Google

Image capture Oct 2014 © 2019 Google

Malahide, County Dublin

Google

Street View Oct 2014

