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The Secretary,
An Bord Pleanála,
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AN BORD PLEANÁLA	
LDG-	<u>017789-19</u>
ABP-	_____
25 JUL 2019 <i>DOH</i>	
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Time: <u>13:05</u>	By: <u>hand</u>

Rossa Mac Canna



25th July 2019

**Re: Greenway between Malahide Demense and Newbridge Demense
to be known as 'Broadmeadow Way'**

Case Reference: PL06F.304624
Applicant: Fingal Council

Dear Sir/Madam,

I am making a submission to you in regard to the application submitted to you by Fingal Council in respect of the Broadmeadow Way Greenway. I support the Broadmeadow Way proposal in principle but believe the Donabate end of the route should go directly to Donabate (with a spur to the eastern end of Newbridge Demesne) – and not to Newbridge House.

My interest in this arises as I am a tax paying resident of Dublin who cycles for leisure but also utility purposes. I am also a motorist and a user of public transport. I want to see public funds invested to develop good quality cycling/walking infrastructure but I want it done in a way that makes the best use of limited funds. I have often cycled between Malahide and Donabate.

Utility cycling (cycling to work, school, shops, restaurants or friends) is by far the larger part of cycling in urban areas such as Dublin. One of the key benefits of utility cycling is that it reduces car traffic and traffic congestion.

The Broadmeadow Way route is designed to go from Malahide Demesne to Newbridge House. As such it appears to have been designed primarily to promote leisure cycling. The Malahide Demesne is located close to the centre of Malahide and is surrounded by residential areas. As a result the proposed route is readily accessible to Malahide based utility cyclists.

However Newbridge House/Demense is not surrounded by housing. As a result of this residents of Donabate who wish to cycle to Malahide will have to either divert a significant distance to travel via Newbridge House or will still have to travel on roads which are shared with motor traffic with all the resulting dangers. This will discourage the use of the cycle route.

This is especially disappointing as a more direct route would enable Donabate residents to easily cycle to Malahide Dart Station which has a Dart service which is much better than the existing commuter service from Donabate. A direct route would therefore much better achieve the goal of reducing car use.

Malahide residents who wish to cycle to Donabate (as opposed to Newbridge House) would be similarly discouraged.

Happily both leisure and utility cyclists can be accommodated by the cycle route continuing from the rail bridge north to Donabate directly alongside or close to the railway line. This would bring it close to the eastern end of Newbridge House and thus a short spur would enable the (mostly leisure) cyclists who would wish to go there. In addition Newbridge House could be accessed by turning off the Malahide/Donabate cycletrack to use the cyclepath along the Donabate Distributor Road, which will be completed shortly.

By staying close to the railway line the cycleway should also benefit from being flat as even relatively minor rises in a cyclepath can discourage cycling – particularly for those who are less fit and cyclists with shopping.

I believe favouring leisure cyclists over utility cyclists makes no sense on this route as utility use should far outweigh leisure use in the area. Leisure cycle trips are likely to be once-off or occasional whereas utility cyclists tend to make frequent and repeated use of local routes.

Continuing the Greenway alongside or close to the railway line (with an added spur to the eastern end of Newbridge Demense) would also eliminate the need for the portion of the route which is intended to go alongside the Pill river. This would remove the need to build the planned 12m bridge over that river and should reduce the cost.

Fingal Council's submission to you claims Broadmeadow Way matches well the vision/goals of various national and local policies. I believe some of these claims are simply false whereas for others the alternative direct route much better matches the policies. I have set out these out in more detail in the enclosed appendix.

In addition I note that the Fingal Coastal Way (which is currently being designed) is intended to start in Newbridge House (Balbriggan.info story 29th May 2019). If these routes are designed in this way any utility cycling between Donabate/Malahide will be diverted unnecessarily via Newbridge House. This would appear to add at least 1-2 km to any journey, 2-4 km to any round trip and 10-20km to a 5 day commute.

This unnecessary diversion of the cyclists via Newbridge House will discourage local utility cyclists and thus lessen the main benefit of the route. As this is a flagship development I believe it is vital that it is given the best chance of success and the best chance of being seen to be successful. Having a route which is seen to be used regularly by local residents throughout the year would help generate local support for future Greenway development in the Greater Dublin Area.

As a result I would ask that An Bord Pleanála approve the Broadmeadow Way plans subject to the redesign of the Donabate end to enable direct access to the main population centre of Donabate.

I would welcome the opportunity to answer any questions you may have and expand further on this at any oral hearing.

/Yours Sincerely

Rossa Mac Canna

APPENDIX – FAILURE TO MEET NATIONAL/LOCAL POLICIES

National Cycle Policy Framework 2009-2020

The vision of this is: "All Cities, towns, villages and rural areas will be bicycle friendly. Cycling will be a normal way to get about, especially for short trips."

While the proposed route can be said to help this vision it does not do so in the optimal way as it includes unnecessary inconvenience to utility cyclists. Both leisure and utility cyclists can be accommodated by a more direct route with a spur to Newbridge House. The proposed route will be less used than a direct route and hence it fails to best match the vision of the National Cycle Policy.

The National Planning Framework

It is stated by Fingal Council in their submission that Objective 22 of the National Planning Framework "prioritises projects in the basis of achieving maximum impact and connectivity". The proposed route clearly fails to achieve maximum impact and thus would not deserve to be prioritised under the National Planning Framework.

Sustainable Residential Development in Urban Areas (2009)

Similarly the section 28 guidelines seeks to "minimise the use of cars". The proposed indirect route between Malahide and Donabate will clearly not reduce car use as much as a more direct route.

Fingal Development Plan 2017-2023

This includes following as Objective MT13: "Promote walking and cycling as efficient, healthy and environmentally-friendly modes of transport by securing the development of a network of direct comfortable, convenient and safe cycle routes and footpaths, particularly in urban areas."

The proposed route fails to meet this objective as it is neither direct nor convenient as a route between Malahide and Donabate.

Greater Dublin Area Cycle Network Plan

The December 2013 (page 51) version of this states that the Fingal East Coast Trail "will connect from Malahide to Donabate across the Broadmeadow Estuary railway viaduct".

Referring to the possibility of other "Local Greenways" it states "There is limited scope for other greenway routes in the small towns in the Central Fingal sector, apart from within public open spaces in residential areas. One particular possibility is within the extensive public parkland at Newbridge Demesne on the western side of Donabate, which could also link to the Broadmeadow Estuary Greenway Loop at Kilcrea Lane."

From this it is clear that the Plan envisaged a route going directly from Malahide to Donabate – and not being diverted via Newbridge House.

