

Broadmeadow Way

Proposed Greenway between Malahide Demense and Newbridge Demense

Planning Report

May 2019



Comhairle Contae Fhine Gall Fingal County Council

An Roinn um Pleanáil agus Infrastruchtúr Straitéiseach Planning and Strategic Infrastructure Department



20th May 2019

Re: Planning Report Broadmeadow Way Greenway

1.0 Introduction

This planning report should be read in conjunction with the suite of documents submitted and informs the policy and planning context to the proposed greenway. The planning application relates to a shared cycle/walkway (Greenway) between the Fingal County Council owned heritage properties of Malahide Demesne and Newbridge Demesne Regional Parks via the Malahide railway viaduct. The Greenway will be for the exclusive use of cyclists and pedestrians. The proposed greenway is predominantly targeted at tourists, day trippers and local users while also playing a role in supporting the national sustainable transport network and will ultimately form part of the proposed Fingal Coastal Way, a strategic greenway extending along the Fingal coast from Kilbarrack to the County boundary north of Balbriggan town. The route will form part of the National Transport Authority's [NTA] Greater Dublin Area Cycle Network.

The explicit support in statutory planning documents for the proposed greenway is discussed in detail at Section 5.0 'Planning Policy' of this report. The current Fingal Development Plan 2017-2023 fully supports the development of the route through its policies and objectives, of particular relevance are, Local Objectives 43 which seeks the completion of the Broadmeadow Way between Malahide and Donabate, as a priority during the lifetime of the current Development Plan and Local Objective GI28 which seeks to provide attractive and safe cycling and walking routes linking open spaces, key parks and cultural sites and heritage assets. Additional local objectives throughout the plan support integrated pedestrian and cycle routes linking with key tourist destinations in the County. The proposed greenway comes forward as a stand – alone project within the context of these relevant objectives and is considered as strategic tourism and sustainable transport infrastructure linking the key recreational and tourist destinations of Malahide Demesne and Newbridge Demesne Regional Parks.

A comprehensive constraints and route options appraisal was undertaken as part of the project and is set out in detail in Volume 4A Appendix 1 and Volume 4B Appendix 2 of the Environmental Impact Assessment Report [EIAR]. Following this comprehensive analysis, the resulting preferred route is considered the optimum route from an environmental and technical engineering perspective. The route is described in detail at section 3.0 of this report and Map 1 Aerial Context appended to this report refers. The

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proposed greenway is c. 6 kms in length and travels through varied and scenic landscapes along a stretch of the Fingal coastal corridor between Malahide and the Donabate peninsula. The landscape context varies between demesne landscapes and park lands, estuarine landscape, rural farmlands and town environments. The proposed scheme utilises existing facilities along the route as much as is possible including publicly owned parklands, public laneways and railway infrastructure.

The proposed greenway on the western embankment of the southern arm of the railway causeway lies within the Malahide Estuary SAC and SPA, a European designated site which forms part of the Natura 2000 network. The greenway crosses the SAC/SPA at the weir. The greenway on the western embankment on the northern arm of the causeway lies outside, but contiguous with, the SAC and SPA. A fundamental priority in the development of this greenway is the protection of these European Sites and their associated habitats and species. Protection of European Sites is an overarching objective of the current Fingal Development Plan. In this regard, the Natura Impact Statement [NIS] appended to this application documents the Appropriate Assessment [AA] process for the proposed greenway in accordance with relevant legislation under the Habitats and Birds Directives. The Environmental Impact Assessment Report (EIAR) appended to this application documents the systematic analysis and assessment of the potential effects of the proposed greenway on the receiving environment in accordance with EIA regulations.

2.0 Purpose of Scheme

2.1 Strategic Tourism Infrastructure

Essentially, the proposed greenway provides for a safe and attractive green corridor for walking and cycling along a stretch of scenic coastal corridor between Malahide and Newbridge Demesne Regional Parks. As a recreational amenity, its value increases as it makes other recreational areas and tourist attractions accessible at the same time.

Both Malahide and Newbridge Demesne Regional Parks within the ownership of Fingal County Council are key recreational and tourism facilities in Fingal. Malahide Castle and Gardens is the top visitor attraction in the County, catering to local, domestic and international markets. Malahide Castle and Gardens has considerable potential to attract increasing numbers of visitors to the Dublin region as well as driving an increased incidence of repeat visits from the local and regional markets.

Newbridge House and Farm built by the Cobbe family in the mid-1700s, together with its original furniture intact, is a unique example from the period within the greater Dublin area. As such it has the potential to attract greater numbers of visitors. The farm is a major attraction for families, while the grounds provide a valuable recreational amenity. The Flavours of Fingal County Show, an annual event, serves to attract and promote Newbridge to the wider population. Major investment has occurred within both these heritage properties in recent years with planned continual investment by Fingal County

Council. Both of these locations have positive features which will enhance the sustainability and attractiveness of the greenway including:

- -Links to existing attractions.
- -Built heritage.
- -Natural heritage.
- -Existing paths, tracks.
- -Appropriate surfaces.
- -Picnic sites.
- -Children's playground.
- -Restaurants/cafés.
- -Good local services.
- -Proximity to towns and public transport.
- -Ease of maintenance.
- -Car park areas.
- -Toilet Facilities

The proposed greenway will connect and facilitate easy access to these two Regional Parks and all they offer in terms of recreational and tourism amenities. In this regard, it is considered that the proposed greenway linking both these heritage properties has the capacity to stimulate and increase tourist visitor numbers to these heritage properties. In this regard, the proposed greenway would help to elevate Newbridge Demesne's position as a top visitor attraction within the County alongside Malahide Demesne.

The Council recognises that the development of new green infrastructure and the tourism resource within the County should be developed in a manner that does not have an adverse impact on the receiving environment. The proposed greenway is sympathetically designed to transport pedestrians and cyclists in a controlled manner between these heritage properties without adverse impacts on its sensitive environmental setting as detailed in Sections 5.4.1 and 5.4.2 of this report. In this regard, the proposed greenway aligns with key green infrastructure and tourism objectives of the FDP 2017-2023 as set out in Section 5.0 of this report.

2.1 Sustainable Transport Route - Commuter Route

The proposed greenway will improve the transport offer to both Malahide and Newbridge Regional Parks for those choosing alternatives to the private car. In this regard, the proposed greenway provides a safe and attractive walking and cycling route between these two parks with connectivity to existing public transport. The proposed greenway will allow also for connection to 'The Square' in Donabate Village via Newbridge Avenue to the east of Newbridge Demesne, which is within a short distance of Donabate Railway Station and bus services. The proposed scheme facilitates direct connectivity to Malahide Village via the existing rail-bridge immediately to the east of Bissets Strand which is within a short distance of Malahide Railway Station and bus services. The route will link to an established walking route to Swords alongside the southern side of Malahide Estuary. Road crossings are proposed alongside various

traffic calming works to provide safe crossing points for all users of the greenway where the route intersects with public roads.

As a cycling commuter route, it will link the towns of Malahide and Donabate and thereby facilitate easy access to a greater number of people within Fingal between the two towns and their services and amenities. The town centre of Donabate is an important focus for a range of commercial, service and community activities. The current population of Donabate is 7,443 [CSO 2016] and the population on the Donabate peninsula could grow to circa 15,000 with the development of designated residential zoned lands. The population of Malahide is projected to grow from 16,550 [CSO 2016] to c.20,000. Malahide benefits from excellent transport accessibility and large scale amenities. As a commuter route, it will provide a safe and direct alternative for cyclists and pedestrians travelling between Malahide and Donabate with the least environmental impact and reducing reliance on the private car. Opportunities exist to link with suburban rail, the Dart at Malahide and Dublin Bus and other pedestrian/cycle routes in the area. The FCC zoning map appended to this report shows the pedestrian/cycle routes as per the FDP 2017-2023.

The Donabate Local Area Plan 2016 comprises strategic residential development lands with a development potential of c.4000 units. The Donabate Distributor Road [DDR] is an integral component of the Donabate LAP 2016 linking Donabate Village to the Hearse Road. Construction of this relief road is ongoing and completion is targeted during Q.4 2019. The proposed greenway and the Donabate Relief Road intersect providing an alternative route to Donabate. The proposed greenway facilitates direct connectivity to proposed walk/cycleway routes within the Donabate LAP lands at Corballis via the existing Dublin-Belfast rail-bridge on the Corballis Cottages Road. The Donabate LAP 2016 Extract Map Figure 4.2 appended to this report shows the proposed route in the context of existing and future green linkages in these LAP lands which link to Donabate town centre and the Donabate Distributor Road. [www.fingal.ie /planning-and-buildings/development-plans-and-consultations/adopted-local-area-plans/donabate-lap-2016 refers]

The greenway will also link to the future Sutton to Malahide Greenway Scheme which is currently at design stage in advance of being lodged to An Bord Pleanala. A 1.8 km section of this greenway within the new Racecourse Park lands between Baldoyle North and Portmarnock South and parallel to the Coast Road was approved in 2018 by An Bord Pleanala under reference ABP -300840-18. This scheme is to be constructed during June -October 2019.

The proposed greenway as a sustainable transport alternative and commuter route aligns with movement objectives in the current Fingal Development Plan as set out in Section 5.0 of this report.

3.0 The Proposed Route

The 6kms route extends from the grounds of Malahide Demesne, along the northern side of the R106 Dublin-Malahide Regional Road, along the public laneway of O'Hanlon's

Lane to Bissets Strand and along the western side of the Malahide railway viaduct, northwards through rural farmland at Kilcrea, crossing the River Pill and continuing alongside the Dublin – Belfast railway line to the Corballis Cottages Road and westwards through agricultural lands, crossing the Donabate Distributor Road where it intersects at Kilcrea Lane and along the northern end of Kilcrea Lane before crossing the Hearse Road to Newbridge Demesne.

In the context of topography and landscape context, the route falls gently from Malahide Demesne towards Bissets Strand and then rises to the level of the railway embankment set almost at the same level as the railway tracks across the viaduct. The route enjoys exceptional long range views to both the Malahide inner and outer estuary and it is from this point that the user will perceive the expansive scale and intrinsic character of the estuarine landscape. North of the estuary, the route embraces the agricultural landscape of the Kilcrea headland. This headland rises gently from the northern shore of the estuary to a low ridgeline some 400-600m back from the shore in a network of arable/pasture fields with an abundance of hedgerows and trees. Although relatively close to the open expanse of the estuary, to the north of the ridgeline, the landscape is relatively low-lying and enclosed. This is due to the small-scale network of fields, the abundance of hedgerows and trees and the raised railway embankment to the east. The route travels northwards alongside the western side of the railway embankment with mature hedging at its base until it crosses the River Pill, a narrow, winding river course that flows through low-lying pasture land to the north of the ridge line and discharges into the Malahide Estuary to the east of the railway line. This lowlying area to the north of this headland is an attractive damp landscape with its associated mud flats. The route continues north of the River Pill to the Corballis Cottages Road and westwards in low-lying and marshy pastureland to the Kilcrea Lane and onwards to the formal demesne landscape of Newbridge Demesne. [Volume 4C -Appendix 8 of EIAR- Plates 1-14 refers and Appendix 12 Aquatic Environment Plates 1-7 refers1

Much of the route is remote from residential properties. Within the Kilcrea headland, there are three residential properties and one farmstead complex along the immediate route of the greenway and these include two detached dwellings set within large site areas fronting the northern end of Kilcrea Lane, a farmstead north of the River Pill with entrance onto the Corballis Cottages Road and a newly refurbished detached dwelling within a relatively large site area that immediately adjoins the railway line and rail bridge with the existing entrance onto the Corballis Cottages Road. The route follows field and property boundaries within Kilcrea for the majority of the route.

Close to Malahide Demesne, the route travels along the northern side of the R106 Malahide-Dublin Road on a new dedicated surface and is immediately adjacent to predominately detached and semi-detached period dwellings. These dwellings are set within extensive site areas, located well back from the adjoining public road and are well screened by mature trees and hedgerow to the front of these properties.

The route utilises O'Hanlon's Lane, an existing public laneway that serves established residential development. This laneway provides for pedestrian through traffic only, as bollards located approximately 188m from the entrance to the lane prevents vehicular through traffic. The majority of this laneway is characterised by predominantly large detached dwellings on large site areas that either front or side onto this laneway. The vast majority of these dwellings are set well back from the existing laneway and the majority of dwellings enjoy a high level of screening to the front or side of their properties. Screening incudes trees, hedgerows and walling. The built character of the northern extremity of this laneway changes with a limited number of low rise apartment developments that front and back onto this laneway. A high block wall forms the treatment for the northern end of this laneway. The southern end of the laneway comprises mature hedgerows with a limited amount of tree canopy.

Residential development in the vicinity of the route at Bissets Strand is characterised largely by terrace and some detached dwellings and elevated above the route with informal car parking arrangements.

4.0 Main Elements of the Scheme

The proposed scheme utilises existing facilities along the route as much as is possible including publicly owned parklands, public laneways and existing railway infrastructure. The public parklands of Malahide Demesne and Newbridge Demesne, within the ownership of Fingal County Council are of a significant benefit to this scheme, serving as trail heads either end of the greenway. These public parklands have adequate services and amenities to cater for the needs of the greenway user.

The proposed greenway will provide a high quality, safe and attractive cycling and walking route over c. 6 kms in length. The vast majority of the route is off-road and away from busy roads. Only two sections of the route will be shared with local road users at the locations of O'Hanlon's Lane and Kilcrea Lane, both of which are public roads that serve existing residential development. O'Hanlon's Lane currently does not accept through-traffic and this arrangement will be maintained. The northern end of the existing laneway at Kilcrea will be a cul-de-sac in the context of the completed Donabate Distributor Road and will serve only one existing residential property. There are only two instances where the route travels alongside regional standard roads in the context of the overall scheme. The first instance occurs alongside the northern side of the R106 Dublin-Malahide Regional Road opposite Malahide Demesne along a new dedicated off-road surface of 3.4 metres in width over a short distance of c. 75 metres. Secondly, the route travels alongside the Donabate Distributor Road on a new dedicated off-road surface of 4 metres width for a short distance of 55 metres east of the Kilcrea Lane.

The majority of the greenway is 4 metres in width in accordance with NTA and NTO requirements, except with limited instances where the greenway utilises existing public laneways and pathways. There are only three locations outside the demesne landscapes where the route is just below 4 metres in width and includes, (i) the short section of dedicated route on the R106 Malahide-Dublin Road where 3.4 metres is proposed, (ii)

the southern end of O'Hanlon's Lane where 3.5 metres is proposed over a short distance of 40 metres and (iii) the northern end of Kilcrea Lane where c. 3.4 metres is proposed over a short section c. 68 metres.

In the context of the overall greenway, these limited instances will not compromise the overall purpose, quality and experience of the greenway for users. Furthermore, the relatively flat topography and level gradient in conjunction with sealed surfaces will provide a comfortable facility for users including wheelchair and buggy users. The majority of the greenway will have a macadam finish. In this regard, the route which is predominantly off-road and away from busy roads, aligns with overarching objectives for the provision of safe and attractive cycleways in the context of promoting cycling tourism in Ireland, as set out in the Failte Ireland's Cycling Strategy as cited in Section 5.0 of this report.

4.1 Route Design Overview

Volume 2 of the EIAR Report at Section 3.0 Project Description appended to this application describes in detail the proposed route and associated design works in six sections as well as construction details. This section should be read in conjunction with the Preliminary Design Drawings 12- 160-239 to 12-160-268 appended to this application.

Section 1- Malahide Demesne

Minimal interventions are required to facilitate the greenway within this demesne landscape where existing pathways are utilised and new signage incorporated. The main design intervention within this demesne occurs within the carpark facility at Bridgefield where a new pedestrian/cycle path is proposed to link with existing pathways within the demesne. Some existing recent planting within Bridgefield carpark is proposed for removal to facilitate this new pathway. [Design Drawing No's 12-160-252 to 253]

Section 2 - R106 Dublin Road Malahide

A new road crossing is proposed opposite the Hogan's Gate entrance of Malahide Demesne in conjunction with a reduction in the carriage width of the R106 Dublin to Malahide Road to provide for a new 3.4m wide shared surface on the northern side of this regional road. These works will occur within the existing road reservation and will not affect property boundaries along this road. The provision of an upgraded entrance on the R106 Malahide-Dublin Road to serve an existing apartment complex located to the rear of the Presbyterian Church is proposed as part of this scheme. No encroachment of the existing curtilage of the existing heritage buildings of the Presbyterian Church or Casino occurs in this regard. [Design Drawing 12-160-254 refers]

Section 3 - R106 Dublin Road to Bissets Strand

Limited works are required along the established public laneway of O'Hanlon's Lane such as re-surfacing, signage and hedge trimming on the southern end of this laneway to facilitate the greenway. No encroachment of properties occurs to facilitate the

greenway at this location. The existing curtailment on vehicular through traffic is maintained. Widths vary along this section of the greenway route between 3.5 metres minimum to 7.4 metres maximum. A new road crossing is proposed at the northern end of O'Hanlon's Lane across the Coast Road to Bissets Strand. New designated car-parking provision and a formalised bin storage pick up point are proposed to the front existing dwellings within the Bissets Strand area to serve existing dwellings within this area. [Design Drawing No's 12-160-255 to 256 refers]

The scheme proposes a new landscape space at the site of the un-used railway maintenance compound at Bissets Strand that will facilitate access onto the viaduct and significantly enhance the local environmental context within this area. [Landscape Design Plan Dr. No. 013813-LP-01 refers]. This area will serve as the main exit/entry point for the viaduct section of the greenway on the southern side of the estuary. From this point cyclists and pedestrians can disperse in various directions towards Malahide Demesne, Malahide Town Centre and Swords via the existing walking trail along the southern side of the estuary. Car-parking is rationalised along the northern side of Bissets Strand and a new stop-go traffic light system is proposed on the Bissets Strand rail-bridge to the east that will facilitate safe access to Malahide town centre. This new landscape space at Bissets Strand and improved connectivity to the town centre aligns with the Malahide Public Realm Strategy 2014 where it an objective of this strategy to improve connectivity within the key spaces and [http://www.fingalcoco.ie/planning-and-buildings/development-plans-andconsultations/studies-and-reports/malahide-public-realm-strategy/ refers]

Flood risk associated with the overall scheme is addressed at Volume 4C of the EIAR Report and specifically at Appendix 17 – Flood Risk Assessment Report. This report identifies the Bissets Strand area within Flood Zone A, a high risk coastal flooding area subject to flooding in the 1% AEP. The management of any future flood events in this area will be managed by FCC as detailed in Section 5 of the Flood Risk Assessment to ensure the safety of pedestrians and cyclists. Design and finishes for the new landscape space at Bissets Strand considers its sensitive context setting including flood events adjacent to the estuary.

Section 4 - Bissets Strand to the north shore of Malahide Estuary

From Bissets Strand, the proposed scheme runs adjacent to the western face of the railway embankment across the Malahide railway viaduct to the north shore of the Malahide Estuary. Much of the pathway base is already in place along the viaduct in the form of a weir maintenance access track from Bissets Strand to c. 200 metres out on the viaduct and along the western embankment shoulder to the northern estuary shore. A new 180 metre cycle/footbridge is proposed to connect these two areas, which will run separate and parallel to the existing railway viaduct. A new viewing area is proposed within the vicinity of the southern end of this new bridge. Volume 2 of the EIAR Report and specifically Section 3.10 Construction – Broadmeadow Way Bridge outlines the construction methodology for this bridge. A screening wall of 1.4 metres in height will form the western boundary of the proposed greenway adjoining the estuary. Security

fencing of 3 metres in height is proposed along the entire eastern side of the railway line to prevent access to the greenway from the railway line at this location. This security fence will be installed by Irish Rail in advance of construction works. Access for maintenance and emergency vehicles is facilitated. [Design Drawing No's 12-160 -257 to 260 refers] It is noted that where the scheme crosses the foreshore, this will be subject to a separate statutory consent procedure under the Foreshore Act.

Section 5 - North Shore of Malahide Estuary to R126 Hearse Road

The route continues northwards from the north shore of the Malahide Estuary into agricultural lands and travels parallel to the railway line as far as the Pill River. Where the route meets the north shore, there is a continuation of the proposed 1.4 metre screening wall for c. 30 metres beyond the north shore of the estuary. From this point, the stone wall ends and the route takes on a less formalised design approach within the Kilcrea headland where the route is bounded by a post and rail boundary fence for the majority of the route. [Design Drawing No. 12-160-260 refers] A hard-core foundation with a macadam finish is proposed for the greenway within these lands. Existing agricultural entrances are maintained within Kilcrea. [Design Drawing No. 12-160-262 refers].

The greenway crosses the River Pill at two locations within Kilcrea, the first crossing requires a cycle/footbridge of c. 50 m in length where a sympathetic design and finish is proposed. [Drawing no. 12-160-261 refers] From this crossing of the River Pill, the route continues along the existing railway access base where this base is utilised and surfaced over. The route travels along the western side of the existing dwelling close to the Corballis Cottages Road where screen planting is proposed in the interests of privacy in agreement with the property owner.

The scheme facilitates future pedestrian/cycle linkages to the Donabate Local Area Plan lands via the existing rail bridge at Corballis Cottages Road. In this context, a stop-go traffic light system is proposed at the existing rail-bridge in the interests of pedestrian and cyclist safety. Beyond this bridge, the existing road is realigned and the existing road incorporated into a new landscaped area adjoining the Malahide Estuary. [Design Drawing No. 12-160-263E refers]

From the existing dwelling close to the rail bridge on the Corballis Cottages Road, the route continues westwards along the edge of agricultural lands and continues to the back of an existing farm-stead where screening is proposed in the interests of privacy in agreement with the landowner. The route crosses the River Pill at its second location within the vicinity of this farmstead where a c. 12 metre length timber bridge is proposed to cross the river at this location. [Design Drawing No. 12-160-264 to 265 refers] The route continues parallel to the river, parallel along an existing property boundary which comprises a yard with extensive sheds, parallel to the Donabate Distributor Road, crossing the relief road where it intersects with Kilcrea Lane via a new pedestrian crossing and northwards along the public laneway of Kilcrea to Newbridge Demesne. Kilcrea Lane will be a cul-de-sac in the context of the completed Donabate

Relief Road. This cul-de-sac will serve one existing property on this northern section of Kilcrea Lane and existing hedgerows and trees are maintained. Re-surfacing is proposed for this laneway. A new road crossing at the junction of Kilcrea Lane and Hearse Road will facilitate access to Newbridge Demesne. [Design Drawing No. 12-160-265 to 266 refers]

Section 6 - Newbridge Demesne

Minimal interventions are required to facilitate the greenway within this demesne landscape where existing pathways are utilised and new signage incorporated. A new road crossing and traffic calming works occurs within the curtilage of the Newbridge Demesne entrance on the Hearse Road. [Design Drawing No. 12-160-267 to 268 refers]. It is noted that Section 5.6 of this planning report discusses architectural heritage impacts in the context of the proposed route and particularly where it relates to works within the curtilage of protected structures such as Newbridge Demesne.

4.2 Sensitive Design Approach

All aspects of the greenway are designed in a manner sensitive to its environmental context including environmentally sensitive screening and lighting of the route. Different lighting options were considered for the scheme and a 1.8 metre bollard incorporating a sensor lighting system is considered the most appropriate in terms of its environmental context. The use of environmentally sensitive lighting as proposed ensures that the proposed greenway is available after day light hours for the cyclist commuter and the recreational user with no detrimental impacts to the ecological sensitivities of the Malahide Estuary and the surrounding area and its species. [Volume 4 C of the EIAR – Appendix 6 Lighting Design Report and Sections 5.5.13 and 7.1.4 of the Natura Impact Statement refers]

The EIAR at Volume 2 -Section 14.0 Landscape and specifically Section 14.8.4 anticipates no detrimental impacts from a visual amenity perspective in relation to this lighting, particularly, where screen planting will become established overtime along the route within Kilcrea. No bins are proposed along the route to encourage the 'Leave no Trace' code of operation for greenways.

5.0 Planning Policy

5.1 National Level

5.1.0 Climate Action and Low Carbon Development Act, 2015

The Act establishes the national objective of transitioning to a low carbon economy, climate resilient and environmentally sustainable economy. It includes the preparation of five yearly National Low Carbon Transition and Mitigation Plans. Agriculture, transport, energy and the built environment are the main targets for mitigation effort. Local Authority climate change adaptation and mitigation strategies will also be required which, when completed, will form part of county development plans.

5.1.1 Our Sustainable Future – A Framework for Sustainable Development for Ireland The Framework for Sustainable Development in Ireland, which was launched in June 2012, identifies some 70 measures to be implemented across Government and tasks a High-Level Inter-Departmental Group with ensuring that the vision set out in the policy document is translated into clear and effective action. One of the key areas of focus is transport. The 2015 Progress Report, charting the progress of the measures, noted that cycling in Dublin is increasing year on year with a near 50% increase in cycling journeys between 2012 and 2015 observed in the Dublin City Centre Cycle Count carried out by DCC in May each year.

5.1.2 National Planning Framework (NPF)

National Policy Objective 22 encourages cycle networks through the facilitation of the development of a National Greenways/Blueways Strategy which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level. The development of a greenway between Malahide Demesne and Newbridge Demesne Regional Parks will facilitate a wider network of greenways and provide access between rural and urban areas for both tourist related activities and commuting.

National Policy Objective 27 facilitates healthy communities through the provision of alternative means of transport to the car and states:

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

The NPF notes that countries with extensive cycle infrastructure report higher levels of cycling and lower rates of obesity. Healthy places in turn create economic value by appealing to a skilled workforce and innovative companies.

The NPF also indicates that Ireland's future homes will be located in places that can support sustainable development 'places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change'. The contribution to a cleaner environment, including air quality, of cycling is recognised.

Cycling is recognised as part of smart growth, enhanced regional accessibility, sustainable mobility and an enhanced urban amenity which are all targeted national strategic outcomes of the NPF. Building centres of scale is intended to be achieved through Metropolitan Area Strategic Plans formulated through the new Regional Spatial and Economic Strategies. The NPF outlines high-level and long term strategic development issues for the MASPs areas including:

- physical development patterns and strategic growth areas.
- strategic infrastructure, particularly in the transportation and water services areas.
- large scale regeneration and the location of housing and employment.

 metropolitan scale amenities such as <u>regional parks and walking and cycling</u> networks.

MASPs align with and inform national-level sectoral investment plans to guide and coordinate investment within the metropolitan areas, coordinating land use planning and strategic infrastructure.

5.1.3 Strategy for the Future Development of National and Regional Greenways (2018)

The Department of Transport, Tourism and Sport recognises the benefits that can arise from the further development of Greenways in Ireland, as a tourism product with significant potential to attract overseas visitors, for local communities in terms of economic benefits, and for all users as an amenity for physical activity and a contributor to health and wellbeing. This strategy aligns with recent Government strategies and policy documents, including the National Planning Framework which supports the role of Greenways as part of Ireland's tourism product and its contribution to rural development.

The objective of this Strategy is to assist in the strategic development of nationally and regionally significant Greenways in appropriate locations constructed to an appropriate standard in order to deliver a quality experience for all Greenways users. It also aims to increase the number and geographical spread of Greenways of scale and quality around the country over the next 10 years with a consequent significant increase in the number of people using Greenways as a visitor experience and as a recreational amenity. It sets out guidance to project promoters on matters including strategic nature, length, design standards, accommodation works and early consultation with communities and land owners along proposed routes.

5.1.4 People, Place and Policy Growing Tourism to 2025

The Government's Tourism Policy Statement People, Place and Policy Growing Tourism to 2025 sets the Government's primary objectives for tourism i.e. to increase overseas visitors and revenue and the associated employment. Therefore the tourism policy statement is centred on Ireland achieving its full potential as a destination for overseas tourism whilst also recognising that the domestic market underpins the tourism offering. The Tourism Policy statement highlights the importance of sustainable development of tourism and recognises the contribution of facilities for activity-based holidays to Ireland's positive image and its attractiveness as a tourist destination. It also notes the Government's support for the development and improvement of our physical visitor attractions, visitor infrastructure and facilities for visitor activities, including the development of Greenways.

5.1.5 Sustainable Residential Development in Urban Areas (2009)

These section 28 guidelines outline the approach to be taken to sustainable residential development and prioritise walking, cycling and public transport, and the need to minimise the use of cars as a shared goal. The guidelines encourage developers to design in public transport, walking and cycling, making places more friendly to people movement rather than vehicle movement.

5.1.6 Smarter Travel – A Sustainable Transport Future: A New Transport Strategy for Ireland 2009-2020

In February 2009, the Smarter Travel Policy document for achieving a sustainable transport system for Ireland was published, this document outlines a number of policies to encourage a modal shift away from private car use and promoting public transport, walking and cycling.

5.1.7 National Cycle Policy Framework 2009-2020

In April 2009, Ireland's first National Cycle Policy Framework (NCPF) was issued; the vision of the policy 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".

The aim of this framework is to encourage a culture of cycling to the extent that by 2020, some 10% of all trips will be completed by bicycle.

5.1.8 Strategy for the Development of Irish Cycle Tourism (2007)

Failte Ireland's document highlights the need for renewing the popularity of cycling in Ireland and how tourism generated through this sector can increase visitor spending in rural and urban areas. Guidance is also given on the types of roads suitable for a national cycle network along with the provision for facilities which support and encourage cycling as a mode. In the context of developing cycling infrastructure and to make Ireland a more attractive destination for cycling, key objectives include the provision of safe and attractive cycling routes with associated services and facilities.

5.1.9 Irish Trails Strategy (2007)

The Irish Trails Strategy was launched in January 2007 and aims to develop a world class recreational trail system in Ireland for all Irish citizens and visitors to the country to enjoy. This strategy lead to the establishment of a National Trails Advisory Committee (NTAC) and the setting up of a National Trails Office within the Irish Sports Council. The NTO have published a number of publications setting out the requirements and standards for trail development in Ireland. Relevant documents include, A' Guide to Planning and Developing Recreational Trails in Ireland', 'Classification and Grading for Recreational Trails' and 'Management Standards for Recreational Trails'. The NTO website includes a register of a wide range of trails on offer throughout the country from strategic to local level trails. Trails which fully meet NTO standards are NTO accredited trials.

5.2 Regional Policy

5.2.1 Regional Spatial and Economic Strategy (RSES) & Metropolitan Area Strategic Plan (MASP) (2019)

The new regional strategy for the region sets out a long-term strategic planning and investment strategy for the Dublin area and surrounding counties and Midlands area to 2031.

Chapter 6 'Economy and Employment' and specifically sub-section 'Natural and Cultural Tourism Assets' recognises the Region's varied and rich tourism offering from its cultural assets of the capital city to the natural landscapes and amenities along the east coast. Failte Ireland has identified that landscape and heritage are the key drivers for the promotion of Ireland's tourism. In this regard, the regional strategy seeks to increase access to the countryside and coastal areas in collaboration with relevant stakeholders whilst having regard to the environmental sensitivities of the surrounding area.

Chapter 7 'Environment & Climate' of the strategy promotes the development of a network of strategic greenways as a unique alternative for tourists and visitors to access and enjoy the natural and built heritage assets of the Region whilst having regard to the environmental sensitivities of the area. The strategy promotes a number of flagship greenways in the Region including, the East Coast Trail and Ireland's Ancient East.

RPO7.23 seeks to, Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and/or linked with local Greenways and other cycling and walking infrastructure, notwithstanding that capacity of a greenway is limited to what is ecologically sustainable.

RPO 7.24 seeks to, Support Local Authorities and state agencies in the delivery of sustainable strategic greenways, blueways and peatway projects in the Region under the Strategy for the Future Development of National and Regional Greenways.

Chapter 8 'Connectivity' of the strategy promotes the importance of the integration of land use and transport which prioritises the development of lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites. Furthermore, the strategy promotes a shift to more efficient modes, i.e. active travel modes and public transport, including walking and cycling to reduce car dependency. In this regard, the following cycling and walking objectives are promoted,

- Delivery of the cycle network set out in the Greater Dublin Area Cycle Network Plan inclusive of key commute routes and urban greenways on the canal, river and coastal corridors.
- Delivery of the National Cycle Plan within the Region inclusive of the Greenway and Blueway Projects.
- Provide safe cycling routes in towns and villages across the Region.
- Enhance pedestrian facilities in all urban areas in the Region.

Included in this RSES is a 12 year horizon Metropolitan Area Strategic Plan (MASP) for Dublin, which will give greater analysis and detail of how the overall objectives and policies of the NPF and RSES will be implemented. The MASP identifies key strategic

residential and employment development corridors, large scale regeneration areas, linked to quality public transport with key services infrastructure investment required to support growth and key investments in amenity and community resources, to create sustainable compact communities.

Section 5.6 of the MASP identifies cycling and walking as a key element in promoting and creating healthier places, mitigating climate change and facilitating tourism and metropolitan scaled amenities such as strategic cycling networks having regard to the NTA Greater Dublin Area Cycle Network Plan. Specifically, the MASP promotes the development of a Metropolitan Greenway Network, a strategic network of connected greenways for cycling and walking to enable access to key environmental assets within the Metropolitan area, including coastal areas, while having regard to the environmental sensitivities of the area. Specifically, the strategy promotes a number of greenways of strategic value that will form part of a connected Strategic Metropolitan Greenway Network and including the East Coast Route from Sutton to Sandymount linking to the Fingal Coastal Way with potential to create a wider East Coast Trail from Rosslare to Northern Ireland.

RPO 5.3 seeks, Future development in the Dublin Metropolitan area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists.

RPO 5.8 seeks to, Support the promotion and development of greenway infrastructure and facilities in the Dublin metropolitan area and to support the expansion and connections between key strategic cycle routes and greenways as set out in the NTA Greater Dublin Area Cycle Network Plan.

5.2.2 Transport Strategy for the Greater Dublin Area, 2016-2035

This document was published by the National Transport Authority in 2016 with its purpose being:

"...to contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods."

The plan provides the transport strategy for the Greater Dublin area to 2035. It highlights the need to integrate land use and transport planning in achieving a consolidated urban area supported by non-private vehicle movement. The environment for pedestrians and cyclists needs to be improved to encourage a much greater proportion of trips to be made on foot, by bicycle or public transport. Dublin is to become a recognized walking and cycling city-region with a street environment that is attractive, safe and pedestrian/cyclist orientated in design.

5.2.3 Greater Dublin Area Cycle Network Plan

The Greater Dublin Area Cycle Network Plan was published by the NTA in 2013 and sets out the proposed cycle network in the Greater Dublin Area. The proposed route is

identified as a greenway route FG1 and a strategic route intercounty N5-Future East Coast Trail. This results in the proposed route needing to cater for both commuter and leisure users with a design that can accommodate both in a satisfactory manner.

5.3 Local Policy

5.3.1 Fingal Development Plan 2017-2023

The core strategy of the plan is to consolidate the majority of the County's future growth in the urban centres of the Metropolitan Area. Both Malahide and Donabate are identified as Moderate Sustainable growth towns that will continue to play an important role within a consolidated Metropolitan Area. Development in these towns should be linked to the capacity of high quality public transport connections and the provision of social and community infrastructure such as schools and leisure facilities.

The Fingal Development Plan sets out to promote and facilitate movement within and to the County through the integration of land use with a sustainable transport system. Priority is given to public transport, walking and cycling. There is a dedicated section in Chapter 7 of the Development Plan that deals with Cycling and Walking. The emphasis in the Development Plan is on the promotion and facilitation of sustainable forms of transport, of which cycling is a key component. The Strategic Vision specifically includes for the promotion of walking and cycling in the following statement:

"Promote active and healthy lifestyles through increased opportunities for walking, cycling and active sport and recreation".

Cycling and walking are promoted in the Fingal Development Plan as a significant form of leisure and are noted as a key attractor for tourism in the area. Chapter 5 - Rural Fingal, includes the following relevant objectives:

Objective RF113 - Promote informal recreation, particularly walking, through the development and expansion of a network of safe walking trails within towns and villages and their environs. Such routes can link with existing way marked trails, Slí na Sláinte walks and of the Green Infrastructure Network and other local resources, such as existing or new rights of way.

Objective RF114 - Support the provision of proposed long-distance walking trails that provide access to scenic uplands, riverine and coastal features, subject to Screening for Appropriate Assessment.

Chapter 7 deals with Transportation and sets out a policy of: "Promote and facilitate movement, to, from and within the County of Fingal, by integrating land use with a high quality, sustainable transport system that prioritises walking, cycling and public transport."

The following objectives set out Fingal County Council's commitment to promoting sustainable walking and cycling modes.

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.

Objective MT14 – The Council will work in cooperation with the NTA and adjoining Local Authorities to implement the Greater Dublin Area Cycle Network Plan subject to detailed engineering design and mitigation measures presented in the SEA and Natura Impact Statement accompanying the NTA plan.

The Fingal Development Plan 2017-2023 composite zoning map appended to this report shows this indicative cycle/pedestrian route from Malahide Demesne to Bissets Strand via O'Hanlon's Lane and across the Malahide railway viaduct to the Donabate Peninsula. The Greater Dublin Area (GDA) Cycle Network extends along this indicative cycle and pedestrian route. Green Infrastructure 1, Sheet 14, identifies these as base cycle networks as taken from the NTAs cycle network plan.

Green Infrastructure is detailed in Chapter 8 of the Development Plan and incorporates the objectives to provide safe, attractive and sustainable routes linking key parks and open spaces and other foci such as cultural sites and heritage assets as an integral part of new green infrastructure provision while ensuring the environment is protected.

A number of relevant green infrastructure objectives are listed below:

Objective GI07 – Ensure green infrastructure protection and provision promotes pedestrian access, cycling and public transport in preference to the car, as appropriate.

Objective GI08 – Integrate the provision of green infrastructure with infrastructure provision and replacement, including walking and cycling routes, as appropriate, while protecting biodiversity and other landscape resources.

Objective GI28 – Provide attractive and safe routes linking key green space sites, parks and open spaces and other foci such as cultural sites and heritage assets as an integral part of new green infrastructure provision, where appropriate and feasible.

5.3.2 'The Broadmeadow Way' – A Priority Objective of the Fingal Development Plan Specifically, the development of the 'Broadmeadow Way' will fulfil the Council's priority objective to complete this route during the lifetime of this plan.

Local Objective 43 - Completion of the Broadmeadow Way between Malahide and Donabate to be prioritised during the lifetime of the Development Plan

and

Local Objective 39 - Seek the provision of a public walkway/cycleway on land to the west side of the train line in Donabate and along the existing railway embankment across the Malahide Estuary, in consultation with larnród Éireann within the lifespan of this Development Plan.

The development of this route will also provide an attractive and safe route linking Malahide and Newbridge Demesne Regional Parks fulfilling the Councils objective to provide for such linkages as an integral part of the new green infrastructure resource within the County under objective GI28.

5.3.3 Tourism

The importance of tourism is detailed in Chapter 6 of the Development Plan where Fingal is excellently placed to contribute to the achievement of national tourism targets due to the location of Dublin Airport in the County, the close proximity of Fingal to Dublin City, the primary driver of the country's tourism industry and the wealth of Fingal's natural, cultural and built heritage. The quality and diversity of Fingal's tourism offer is particularly strong in relation to Council owned heritage properties such as Malahide Castle and Gardens, Fingal's top tourism attraction and Council operated events such as the Flavours of Fingal County Show in Newbridge Demesne. The Council will engage and collaborate with all relevant stakeholders to ensure the economic potential of the tourism sector is secured for the benefit of the local economy.

The Fingal Tourism Strategy 2015 - 2018 estimates that tourism is worth €500 million annually to the local Fingal economy and supports approximately 20,000 jobs. The strategy identifies key assets, attractions and activities that can be further developed and promoted in terms of developing the tourism resource. These include conserving Fingal's natural heritage, promoting scientific heritage, boosting business, sports, food tourism, broadening the range of visitor experiences and improving experiences at the Council owned heritage properties. A key action of the strategy set out at objective CRT5 seeks the development of a cycleway linking Malahide Castle and Gardens with Newbridge House and Farm.

The Fingal Development Plan incorporates a number of objectives to support the objectives and actions identified in the strategy whilst having regard to the protection of the natural and built heritage assets of the County.

Objective ED59 - Facilitate and contribute to the implementation of the objectives and actions identified in the Fingal Tourism Strategy 2015-2018 for the economic benefit of the County.

Objective ED60 - Develop the necessary tourism infrastructure, visitor attractions and supporting facilities at appropriate locations in the County in a manner that does not have an adverse impact on the receiving areas and the receiving environment.

5.4 Landscape Designations and Zoning Objectives

The high quality of the landscape in which the greenway is proposed is reflected in the landscape zonings and designations contained within the Fingal Development Plan. The

Fingal Development Plan 2017-2023 composite Zoning Map and Green Infrastructure Maps 1, 2 and 3 appended to this report refers.

5.4.1 Malahide Estuary

Green Infrastructure Map 1 as per Sheet 14 of the FDP 2017-2023 appended to this report identifies Malahide Estuary as being highly sensitive landscape with preserved views from Bissets Strand and along the Corballis Cottages Road to the Malahide Estuary. It also identifies the lands as having the landscape character type Estuary. A number of objectives in the written statement relate to landscape character, including Gl03 and Gl36.

Objective GI03 – Develop the green infrastructure network to ensure the conservation and enhancement of biodiversity, including the protection of European Sites, the provision of accessible parks, open spaces and recreational facilities (including allotments and community gardens), the sustainable management of water, the maintenance of landscape character including historic landscape character and the protection and enhancement of the architectural and archaeological heritage.

Objective Gl36 - Ensure green infrastructure provision responds to and reflects landscape character including historic landscape character, conserving, enhancing and augmenting the existing landscapes and townscapes of Fingal which contribute to a distinctive sense of place.

Chapter 9 of the Development Plan, Natural Heritage, includes policy and objectives on landscape character assessment, in particular objectives NH33-34 and NH36. The Estuary Character Type is categorised as having an exceptional value, recognised by the EU designations (candidate Special Areas of Conservation and Special Protection Areas) that apply to each in addition to national designations such as proposed Natural Heritage Areas. The aesthetic quality of the estuaries is also recognised as outstanding and the character type is highly sensitive to development.

Objective NH33 – Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape when determining a planning application.

Objective NH34 -Ensures development reflects and where possible, reinforces the distinctiveness and sense of place of the landscape character types, including the retention of important features or characteristics, taking into the various elements which contribute to their distinctiveness such as geology and landform, habitats scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquility.

Objective NH36 - Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic value of the area. New development in highly sensitive areas shall not be permitted if it:

- Causes unacceptable visual harm
- Introduces incongruous landscape elements
- Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness, (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns, (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.

The Malahide Estuary, estuarine and saltmarsh habitat of exceptional ornithological and ecological interest is of particular importance for migratory wintering waterfowl. The exceptional value of the Malahide Estuary is recognised by the EU designations, Special Areas of Conservation [SAC – Site Code 000205] and Special Protected Areas [SPA – Site Code 004025], the national designation of proposed Natural Heritage Area (pNHAs) and the international designation of wetlands under the Ramsar Convention. These sites are a part of a pan-European network known as Natura 2000 and are legally protected under national laws, EU Directives and International Conventions. The Conservation Objectives for Malahide Estuary SPA and SAC are appended to the Natura Impact Statement [NIS] at Appendix 2 and 3 with the designated areas shown at Maps 1-6 of the NIS. The Fingal Development Plan at Chapter 9 Natural Heritage – Core Biodiversity Conservation Areas is explicit in its protection of these sites and seeks to strictly protect areas designated as Natura 2000 sites, Special Areas of Conservation [SAC's] and Special Protection Areas, also known as European Sites.

Objective NH15 - Strictly protect areas designated or proposed to be designated as Natura 2000 sites (i.e. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); also known as European sites) including any areas that may be proposed for designation or designated during the period of this Plan.

The Fingal Development Plan at Chapter 9 Natural Heritage and specifically Section 9.5 Coastal Tourism and Recreation recognises that the coast is an established area of leisure and amenity and coastal areas have great potential for tourist related projects which could generate sustainable employment opportunities. These include land based activities such as walking and cycling and water based activities along the Fingal coast. The Council recognises that these activities require a coastal location but need to be controlled and directed appropriately in view of the sensitive nature of the coast. In the context of tourism related development and specifically the development of walking and cycling routes, the protection of the natural and cultural heritage of the Fingal coast is explicitly promoted in the development plan.

Objective NH65 of the FDP seeks to ensure that there is appropriate public access to the coast including the provision of coastal walkways and cycleways, while taking full account of the need to conserve and enhance the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on European Sites and species protected by law, through Screening for Appropriate Assessment and examine the designation of traditional walking routes such as public rights of way.

The Constraints Report appended to this application at Volume 4A – Appendix 1 of the EIAR identifies the environmental sensitivities of the project area. The proposed greenway is partly located with the Malahide Estuary SPA/SAC. With the implementation of proposed mitigation measures, the Appropriate Assessment concludes that there will be no adverse impacts on the Malahide Estuary SAC.

The key environmental constraint identified in the context of the Malahide Estuary is the potential for disturbance to migratory birds by pathway users and construction works. This issue has been addressed by the provision of a screening wall [1.4m high] along the full western extent of the greenway adjoining the estuary. This screening wall continues just beyond the north shore of the Malahide Estuary to prevent encroachment onto this sensitive shoreline adjoining the estuary. No screen wall is required on the eastern side due to the presence of the existing railway embankment, providing a visual barrier between the birds of the outer estuary and the pathway. In terms of the construction works, impacts are avoided by construction outside the overwintering period when the migratory birds are not present. The Appropriate Assessment concludes that with the implementation of proposed mitigation measures, there will be no adverse impacts on the Malahide Estuary SPA. Overall, the Appropriate Assessment concludes that with the implementation of proposed mitigation, there is no potential for adverse residual impacts on sites or the conservation objectives arising from this project, on its own or in combination with other plans or projects in the wider area.

In this context, the proposed development provides accessibility to a stretch of coastal corridor and its biodiversity, where the proposed development will not give rise to significant adverse impacts on the European Site of the Malahide Estuary and its associated habitats and species. In this regard, the proposed development complies with objective NH65 of the Fingal Development Plan.

In addition, the proposed development accords with relevant green infrastructure objectives relating to the provision of walking and cycling routes whilst protecting the cultural and natural heritage of the area. In the context of green infrastructure provision, the proposed greenway will provide a significant addition to the green infrastructure resource within the County.

In terms of landscape impacts, Volume 2 of the EIAR at Section 14.0 Landscape anticipates no detrimental impacts on the estuary landscape character type or the visual amenity of this area particularly in the context of specific mitigation measures outlined at Section 14.7 of the EIAR relating to landscape protection. Given the complimentary nature of the use of the greenway for walking and cycling which extensively utilises and aligns with existing railway infrastructure within this area, the sensitive design approach and mitigation measures relating to landscape protection, the proposed greenway would not constitute a visually prominent feature in this estuary landscape, would not interfere with protected views towards Malahide Estuary and would not adversely impact on the highly sensitive estuary landscape character. In this regard, the proposed

greenway complies with relevant landscape protection objectives of the Fingal Development Plan.

5.4.2 Kilcrea Lands

The lands on the northern side of the estuary at Kilcrea are predominately flat, low lying pasture/arable lands and comprise an abundance of hedgerows and trees. Although relatively close to the open expanse of the estuary, the landscape is relatively low-lying and enclosed. The River Pill, a narrow, winding river course flows through this low-lying pasture land from the direction of Newbridge Demesne and discharges into the Malahide Estuary to the east of the railway line at Kilcrea. These lands are zoned 'HA' High Amenity in the Fingal Development Plan. The zoning objective seeks to, 'Protect and enhance high amenity areas'. [FDP 2017-2023 Zoning Composite Map appended refers] The zoning vision recognises the amenity potential of these areas and opportunities to increase public awareness will be explored. A recreational walkway is open for consideration in this zoning objective. The Fingal Development Plan is explicit in its protection of high amenity lands at Chapter 9 Natural Heritage – High Amenity Lands and specific development plan objectives in this regard include;

Objective NH51 - Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place.

Objective NH52 - Ensure that development reflects and reinforces the distinctiveness and sense of place of High Amenity areas, including the retention of important features or characteristics, taking into account the various elements which contribute to its distinctiveness such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.

In relation to the protection of the overall biodiversity of the area, the Fingal Development Plan is explicit in the protection of the County's biodiversity and specific development plan objectives of particular relevance include:

Objective NH24 -Protect rivers, streams and other watercourses and maintain them in an open state capable of providing suitable habitat for fauna and flora, including fish.

Objective NH27 - Protect existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management.

In this context, a greenway facility can only be considered within these lands where the high landscape value and intrinsic character of these lands and its associated natural and cultural heritage features of the area would not be adversely affected.

Green Infrastructure Map 1 as per Sheet 14 of the FDP 2017-2023 appended to this report identifies the lands at Kilcrea as being a highly sensitive landscape. It identifies the lands as having the landscape character types Estuary and Low Lying Agricultural.

Specifically the lands within Kilcrea immediately north of the Malahide Estuary are designated as estuary character type while the lands further to the north-west of this headland are designated as a low lying character type. The estuarine character type is highly sensitive to development as evidenced previously in this report and Objective NH36 above specifically refers to the protection of the estuary character type within this area. The Low Lying character type is characterised by a mix of pasture and arable farming on low lying land with few protected views or prospects and has low sensitivity with regards to development. Low lying landscapes can absorb a certain amount of development once the scale and forms are kept simple and surrounded by adequate screen boundaries and appropriate landscaping to reduce impact on the rural character of the area. The protection of views and riparian corridors from inappropriate development is of paramount importance to these areas. Objectives NH33 and NH34 of the Fingal Development Plan as cited previously are relevant protection objectives for these lands at Kilcrea.

Green Infrastructure 2 on Sheet 15 appended to this report shows these lands at Kilcrea as a designated ecological buffer zone which seeks to protect the ecological integrity of the nationally and internationally designated sites by providing suitable habitats for key species such as birds. Around the estuaries, these buffer zones can provide for low intensity recreational uses such as walking and cycling where a proposal will have no significant adverse impact on the habitats and species of interest in the buffer zone and its ecological functions. [pg 322 of FDP refers]. The Fingal Development Plan at Chapter 9 Natural Heritage - Ecological Buffer Zones is explicit in its protection of these ecological buffer zones.

Objective NH18 - Protect the functions of the ecological buffer zones and ensure proposals for development have no significant adverse impact on the habitats and species of interest located therein.

The Environmental Constraints Report appended to this application at Volume 4A Appendix 1 identifies the key environmental constraint in relation to these lands at Kilcrea. In this regard, these lands are valuable roosting and feeding habitat for bird species associated with the Malahide Estuary SPA and while outside the designated Malahide Estuary SPA, these habitats are to be protected. The Route Options analysis appended to this application at Volume 4B of the EIAR-Appendix 2 identified a number of alternative routes in Kilcrea and it is considered that the proposed route will have no detrimental impacts on these feeding and roosting sites. To ensure that no disturbance to migratory birds and no encroachment of habitats occur within Kilcrea, a mixed hawthorn and blackthorn hedgerow will be planted along the western line of the proposed timber post and rail inclusive of mesh wiring to provide a visual and physical barrier between bird species and their habitats and the pathway.

Given the environmentally sensitive nature of the Kilcrea lands and its rural context, it is considered that the incorporation of any future lighting of the route within the Kilcrea lands including the section of the route adjoining Corballis Cottage Road and on Kilcrea Lane shall incorporate the 1.8 metre high environmentally sensitive bollard lighting

system in place of standard street lighting. In the event of a grant of permission forthcoming, a condition in this regard is required.

In this context, the proposed greenway will not encroach or interfere with valuable roosting and feeding habitats within these lands particularly where the route is positioned on the edge of these habitats in conjunction with appropriate screening measures along the route where migratory birds are feeding and roosting. In this regard, the biodiversity of the area is protected from adverse impacts and critically the ecological function of these buffer zone lands are maintained without significant adverse impacts. In this regard, the proposed greenway would comply with Objective NH18 of the Fingal Development Plan relating to the protection of ecological buffer zones.

Volume 2 of the EIAR Report at Section 8.2 Aquatic Environment and specifically subsection 8.2.28 identifies the River Pill as having a limited range of habitats and species which is further affected by current water quality. Flood Risk and water quality in the area is set out in Green Infrastructure Map 3 as per Sheet 16 of the FDP 2017-2023 appended to this report. The water quality of the Pill River is shown as 'Moderate'. Notwithstanding, the Pill River is classified as a river of high local importance due to the semi-natural nature of its various habitats, especially in its lower reaches which floods naturally.

The Flood Risk Assessment appended to this application at Volume 4C of the EIAR at Appendix 17 identifies tidal and fluvial flooding in the area of the River Pill within Kilcrea. The presence of the existing flapped outfall where the river flows into the estuary will lead to a reduction in the risk of high tidal flooding or a storm surge event upstream within the Kilcrea lands. In this context, fluvial flooding impact was further assessed. Approximately, 2.41 km's of the proposed route is identified as having a potential for fluvial flooding within the Kilcrea lands. Notwithstanding, the entire length of the route between the proposed bridge over the River Pill and Newbridge Demesne is identified within Flood Risk Zone B and therefore usable at all times up to the 1% AEP.

Volume 2 of the EIAR Report at Section 8.2.29 identifies the potential for construction impacts in relation to the River Pill. These issues are addressed by specific mitigation measures relating to sensitive and soft-touch construction methods as set out in Volume 2 - Section 8.2.46 of the EIAR Report. In this regard, the EIAR anticipates no detrimental impacts in relation to the aquatic environment of the River Pill. The proposed development therefore complies with Objective NH24 of the Fingal Development Plan relating to the protection of rivers and watercourses.

There will be a minimal loss of the hedgerow resource within Kilcrea relative to the overall hedgerow resource. Volume 2 of the EIAR at Section 14.0 Landscape and subsection 14.4.13 anticipates no detrimental impacts on the hedgerow resource within this area in the context of the low level of hedgerow removal and the level of proposed replacement planting along the route. Specific mitigation measures are proposed in relation to the protection of the hedgerow resource within Volume 2 of the EIAR at

Section 14.7.3. In this context, the proposed development complies with Objective NH27 of the Fingal Development Plan relating to the protection of hedgerows which contributes to landscape character of the area.

Volume 2 EIAR at Section 14.0 Landscape anticipates no detrimental impacts on the landscape character of the area or the visual amenity of this area having regard to specific mitigation measures proposed in Section 14.7 relating to landscape protection. The proposed greenway would not be a prominent feature within the landscape within Kilcrea by reason of its relatively flat topography and location of the route along the western embankment of the railway line with extensive screening at its base and the use of the existing railway access base for the vast majority of the route. This coupled with the enclosed nature of the landscape and screening, limited removal of the hedgerow resource and subsequent replanting, sensitive design and construction approach including the incorporation of the sensitive bollard lighting system and minimal land-take, the proposed development would not adversely affect the highly sensitive estuary and low lying character of the area and the overall high landscape quality of these high amenity lands.

The proposed development complies with development plan policy and objectives relating to biodiversity and landscape protection relating to these lands and specifically to the protection of ecological buffer zones associated with European Sites. In this regard, it is considered that the proposed greenway would be a complementary use within these lands, will not affect its intrinsic character and associated habitats and species. The proposed greenway is therefore considered to be an acceptable use within these high amenity lands and complies with the zoning objective and vision for these lands.

In relation to impacts on agricultural activities within this headland, Volume 2 of the EIAR at Section 11.2 Agronomy identifies the key impacts relating to agricultural activity as land-take, severance and disturbance. Land-take to facilitate the proposed greenway is low at [2.5 hectares] and relates to areas of low ecological value. The level of severance is also low at [1.7 hectares]. In relation to disturbance, the EIAR anticipates no significant adverse impacts. Overall, no detrimental impacts are anticipated in relation to agricultural activity, specifically in the context of identified mitigation measures relating to the protection of agricultural activities set out at Section 11.2.25.

With regard to impacts on residential amenity within Kilcrea, the proposed development maintains existing entrances and screening. Additional screening will be provided in agreement with property owners where necessary. In relation to impacts on the existing properties within the Kilcrea Lane area and the farmstead north of the River Pill, it is considered these properties will not be adversely affected by the proposed development from a residential amenity and privacy perspective given the adequate level of separation distance between the route and these properties, the high level of existing and proposed screening on property boundaries and a section of the route aligns with already permitted road infrastructure of the Donabate Distributor Road close to Kilcrea Lane. Extensive screening is also proposed along this relief road where it

adjoins existing dwellings. In relation to impacts on the property adjoining the Corballis Cottages Road and existing railway-bridge to the east, the route travels along the western extent of this property boundary where existing boundary treatment will be supplemented with additional screening in agreement with this property owner. The use of the sensitive bollard lighting system will also serve to minimise any likely impacts on adjoining dwellings along this section of the route. In this context, it considered that no adverse impacts will arise from a residential amenity and privacy perspective.

5.5 Archaeological Heritage

The Fingal Development Plan is explicit in the protection and promotion of the County's archaeological heritage as set out in the policy and objectives set out in Chapter 10 Cultural Heritage. Specifically, the Council is committed to protecting, conserving and presenting the County's rich cultural heritage while promoting sustainable economic development and the enrichment of the environment. In this regard, relevant objectives include:

Objective CH02 - Favour the preservation in situ or at a minimum preservation by record, of archaeological sites, monuments, features or objects in their settings. In securing such preservation the Council will have regard to the advice and recommendations of the National Monuments Service of the Department of the Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

Objective CH03 - Protect all archaeological sites and monuments, underwater archaeology, and archaeological objects, which are listed in the Record of Monuments and Places and all sites and features of archaeological and historic interest discovered subsequent to the publication of the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process.

Objective CH05 - Ensure archaeological remains are identified and fully considered at the very earliest stages of the development process, that schemes are designed to avoid impacting on the archaeological heritage.

Objective CH17 - Support the growth of cultural tourism in the County, including the potential for niche heritage based tourism products by facilitating the development of heritage events, infrastructure such as heritage trails, walkways and cycleways etc. and activities such as community excavation.

Green Infrastructure Map 1 as per Sheet 14 of the FDP 2017-2023 appended to this report shows the County's archaeological heritage. There are no known national monuments on the immediate route of the proposed greenway. The proposed greenway utilises existing facilities and will route through areas where much disturbance has already taken place. In this regard, the EIAR anticipates no detrimental impacts to archaeological heritage. Specific mitigation measures specifically relating to

construction of the greenway are set out in Volume 2 of the EIAR at Section 12.7 'Archaeology & Cultural Heritage.

In this context, it is considered there will be no adverse impacts to archaeological heritage and the proposed development accords with development plan policy and objectives relating to the protection of the County's archaeological heritage.

5.6 Architectural Heritage

The parklands of Malahide and Newbridge Demesnes are zoned 'OS' Open Space which seeks to, 'Preserve and provide for open space and recreational amenities'. The zoning vision seeks to provide recreational and amenity resources for urban and rural populations subject to strict development controls. Only community facilities and other recreational uses will be considered and encouraged by the Planning Authority. A recreational facility is permitted in principle in this zoning objective. In the context of the 'OS' zoning objective and vision, the nature of this greenway for walking and cycling where it utilises existing pathways within the demesne parklands is considered a complementary and acceptable use within this zoning objective for these lands.

Green Infrastructure Map 1 as per Sheet 14 of the FDP 2017-2023 appended to this report identifies the lands as being highly sensitive landscape. It also identifies the lands as having a Low Lying Agricultural landscape character type. Green Infrastructure 2, Sheet 15 appended to this report identifies these demesne landscapes as Nature Development Areas, locations where nature conservation can be combined with activities such as recreation. These demesne landscapes are also designated Architectural Conservation Areas [ACA's] and include a number of Protected Structures. Malahide Demesne ref. 382 – Lime kiln within grounds of Malahide Castle, ref. 383-Malahide Castle – medieval castle including gate lodges, stone out-buildings, entrance gates and piers), ref- 384 – Malahide Abbey in ruins within the grounds of Malahide Castle. Protected Structures within Newbridge Demesne include ref. 493 – Lanestown Castle – a medieval three-storey stone tower house and ref.494 – Newbridge House, outbuildings, walled gardens, gates and gate piers.

The Fingal Development Plan is explicit in the protection and careful promotion of the County's architectural heritage as set out in the policy and objectives of Chapter 10 subsection 10.3 Architectural Heritage. In this regard, relevant objectives include:

Objective CH20 - Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, is compatible with the special character, and is appropriate in terms of the proposed scale, mass, height, density, layout, materials, impact on architectural or historic features, and junction with the existing Protected Structure.

Objectives CH25 – Ensure that proposals for large scale developments and infrastructure projects consider the impacts on the architectural heritage and seek to avoid them. The extent, route services and signage for such projects should be sited at a distance from Protected Structures, outside the boundaries of historic designated

landscapes, and not interrupt specifically designed vistas. Where this is not possible the visual impact must be minimised through appropriate mitigation measures such as high quality design and/ or use of screen planting.

Objective CH32 - Avoid the removal of structures and distinctive elements (such as boundary treatments, street furniture, paving and landscaping) that positively contribute to the character of an Architectural Conservation Area.

Objective CH35 - Require that proposed infrastructural and public utility works within Fingal do not remove historic street furniture such as limestone or granite kerbs, cobblestones, cast-iron postboxes, waterpumps, milestones and street lighting, except where an exceptional need has been clearly established.

Objective CH41 - Protect where appropriate industrial heritage structures or elements of significance identified in the Fingal Industrial Heritage Survey by adding them to the Record of Protected Structures during the lifetime of the Development Plan.

Objective CH50 - Provide universal access to archaeological and architectural heritage sites where appropriate. Ensure the archaeological and architectural heritage significance of the site is taken into account when providing such access.

Minimal interventions are required to facilitate the greenway within these demesne landscapes where existing pathways are utilised. Works required to facilitate the greenway have been sensitively designed having regard to the protected status of these demesne landscapes, including the need to protected existing woodlands. Volume 2 of the EIAR at Section 14.0 Landscape anticipates no detrimental impacts on the landscape character or the visual amenity of these demesne landscapes. In the event of a grant of permission forthcoming, a condition is recommended whereby any works within the curtilage of these demesne landscapes shall seek the prior agreement of the Council's County Architect, Conservation Officer and Senior Parks Superintendent.

The Malahide Railway viaduct [mid-19th century stone piers supporting the railway line] is a protected structure ref. 420 under the Fingal Development Plan. The proposed route utilises the western embankment of the railway viaduct and does not interfere with these protected piers.

There are a number of protected structures along the northern side of the R106 Malahide/Dublin Road and directly opposite Malahide Demesne and Regional Park as follows;

ref. 424 -1 pair 19th century semi-detached 2 storey red brick houses;

ref. 425-1 pair 19th century semi-detached 2 storey red brick houses;

ref. 426 -Malahide Presbyterian Church;

ref. 385 -Casino -late 18th/early 19th century thatched dwelling in cottage ornee style.

ref. 386 -19th century cast iron milestone in granite setting in boundary wall of the thatched house of the Casino.

There are two protected rail bridges along the proposed route, ref. 502 - mid 19th

century stone rail bridge over the existing road at Corballis Cottages Road and ref. 423 – mid 19th century stone rail bridge over the existing road at Bissets Strand, Malahide.

No immediate works are proposed to these protected structures along the route, however, works particularly relating to road crossings and traffic calming come within close proximity of the curtilage of protected structures along the route and particularly at the, i) R106 Malahide-Dublin Road, ii) the Hearse Road adjoining the back entrance gate of Newbridge Demesne and iii) the existing railway bridges at Corballis Cottages Road and Bissets Strand.

The EIAR identifies the potential for construction and operational impacts in relation to architectural heritage. The EIAR anticipates no detrimental impacts on the architectural heritage and identifies specific mitigation measures relating to the protection of architectural heritage along the route. [Volume 2 of the EIAR -Section 13.0 'Architectural Heritage' and Section 13.5 'Architectural Heritage' mitigation measures refers]

Careful siting and design in relation to proposed road crossings and traffic calming measures is required in the context of preserving the curtilage of protected structures and their vistas. Areas of concern include, the R106 Malahide to Dublin Road where a number of protected structures adjoin the proposed route and within the curtilage of the Newbridge Demesne entrance on the Hearse Road. A specific mitigation measure relating to monitoring of works adjoining these particular protected structures is cited in Volume 2 of the EIAR at Section 13.5 'Architectural Heritage. In the event of a grant of permission forthcoming, a condition is also recommended whereby any works within the curtilage of protected structures along the route including traffic calming works and road crossings shall seek the prior agreement of the Council's Conservation Officer. An additional condition is recommended, whereby monitoring of works adjoining any protected structures along the route shall be carried out by a professional, suitably qualified and experienced in conservation.

It is also noted that Fingal County Council has developed a comprehensive signage scheme for their heritage properties for future walking/cycling routes within the County as part of a collaboration between the Council's Architects, Parks and Biodiversity Departments. In the event of a grant of planning permission forthcoming, a condition is recommended whereby signage shall comply with FCC's established signage schemes.

In the context of the limited nature of the works within the demesne landscapes, where existing pathways are exclusively used and where no direct works occur to protected structures along the route and with the prior agreement of the Council's Conservation Officer and the monitoring of any future works in the vicinity of protected structures, it is considered that there will be no significant adverse impacts on the existing architectural heritage along the route or to the landscape character of the demesne landscapes. In this regard, the proposed development complies with the policies and objectives of the Fingal Development Plan relating to the protection of the County's architectural heritage.

5.7 Established Residential Development within Malahide

The route travels to the south of existing residential development on the R106 Malahide-Dublin Road and through the established public road of O'Hanlon's Lane, Malahide which serves established residential development. The route also lies adjacent to existing residential development on Bissets Strand. These areas are zoned 'RS' – Residential and the zoning objective seeks to, 'Provide for residential development and protect and improve residential amenity.' [Fingal Development Plan 2017-2023 Composite Zoning map refers] The zoning vision seeks to ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity. A recreational walk/cycleway is open for consideration in this zoning objective. Green Infrastructure Map 1 as per Sheet 14 of the FDP 2017-2023 appended to this report identifies the lands as being within a highly sensitive landscape and within the estuary and low lying character area. O'Hanlon's Lane enjoys views towards the Malahide Estuary.

No encroachment of properties on the R106 Dublin–Malahide Road will occur to facilitate the greenway facility at this location. A new shared surface for the greenway is achieved from the existing carriageway and therefore no direct impact on properties at this location will occur in this regard. Dwellings along this section of the route are set well back from the adjoining regional road and enjoy a high level of established screening to these properties.

In the context of the route options explored, the public laneway of O'Hanlon's Lane is deemed to be the optimum route within this area to provide the connection between Malahide Demesne and Bissets Strand on the Coast Road. The majority of the extensive residential properties along this laneway either side or front this laneway and the building lines for the majority of these dwellings are set well back from this laneway with a high level of established screening to these properties. No significant works are proposed to this laneway; resurfacing, signage and hedge trimming mainly on the southern end of this laneway is the full extent of the works at this location. No encroachment of properties will occur to facilitate the greenway facility at this location and therefore no direct impact on properties will occur in this regard. The curtailment of through traffic is maintained on O'Hanlon's Lane.

While it is accepted that increased usage and an increased flow of cyclists and pedestrians to this laneway will occur, this is an already established public laneway and coupled with orientation and established buildings lines with a high level of setback from this laneway and the high level of screening that exists for the majority of these dwellings, it is considered that the proposed greenway will not adversely affect these properties from an amenity and privacy perspective. Residents along this laneway will benefit from direct connection to the greenway facility and the linkages its offers.

In terms of impact on the overall character of this laneway, given the limited nature of the works required to facilitate the greenway and the already public nature of this established laneway, it is considered that the overall character of this laneway will

not be adversely affected.

It is considered that properties in the Bissets Strand area will not be adversely affected from an amenity and privacy perspective given the separation distance of the proposed route from these dwellings and the elevated position of these dwellings above the route. In addition, new designated residential parking and bin storage pick-up provision is proposed for dwellings in this area. A new landscape space adjacent to these properties will result in a significant visual improvement of the area. It is also noted that there is an already established walkway opposite these dwellings along the southern side of the Malahide Estuary to Swords.

In view of the above, the proposed development is considered to be an acceptable use within these residential areas and in this regard, the proposed development complies with the residential zoning objective and zoning vision for the area as set out in the Fingal Development Plan.

5.8 Donabate Distributor Road

The Fingal Development Plan also shows the route of the Donabate Distributor Road, an integral component of the Donabate Local Area Plan 2016 linking the Portrane Road to Hearse Road through the Donabate LAP lands. [Fingal Development Plan 2017-2023 Composite Zoning map refers] The proposed cycle/walkway will not affect this road construction in this area and the preliminary route design carefully considers the cycle/walkway in the context of this permitted relief road. The Donabate Distributor Road is currently under construction and due for completion during Q.4 2019.

6.0 Planning History

Relevant to Bissets Strand where a new landscaped area is proposed:

F01A/0376 Retention Permission Granted for existing drainage pipes and Permission Granted for the construction of new drainage pipes to facilitate residential development permitted on lands at 4 The Strand, Malahide under Planning Ref. F00A/0842 and for new residential development sought under Pl. Ref. F01/0615 on lands at the Casino, including the upgrade of an approved foul sewer connecting to an existing public sewer in The Strand, a new surface water sewer connecting to the existing surface water outfall and the upgrading of the existing surface water outfall to the Malahide Inlet. The residential scheme on the Casino lands was subsequently permitted by An Bord Pleanala under Pl.06F.130336. There is no recent relevant planning history pertaining to the remainder of the proposed route.

7.0 Funding

It is intended that Fingal County Council and the National Transport Authority [NTA] will fund the construction of the walking and cycling route.

8.0 Stakeholder Consultation

Fingal County Council hosted an informal public display of the emerging scheme between 14th February and 14th March 2014 in Malahide Public Library, Donabate/Portrane Community Centre and Fingal County Council Offices, Swords. Elected Members, local interest groups and local landowners were invited to attend.

Two public information evenings were held on 25th February 2014 in Malahide Public Library and the on the 5th March 2014 in Donabate/Portrane Community Centre with FCC Council staff and relevant project consultants in attendance. In the course of these consultations, a questionnaire was distributed to assist in the perception of the proposed scheme. 101 no. questionnaires were returned to Fingal County Council by the stated deadline of 28 March 2014. In addition, 30 written submissions were received from interested parties. Local property/landowners within the Kilcrea area were also directly consulted throughout the process. Consultation was also held with the NPWS, NTA and Irish Rail. The feedback put forward during the consultation process has been incorporated in the design of the scheme where feasible.

9.0 Land Acquisition

The Council intend to use its Compulsory Purchase Order powers to acquire any required land not currently in Council ownership for the purpose of delivering the proposed greenway and will be subject to a separate consent procedure.

10.0 Management and Maintenance

Fingal County Council will manage and maintain the proposed greenway and the facility will operate under the Leave no Trace Code of Conduct for greenway development.

11.0 Conclusion

There is a clear planning policy context for the proposed cycle/walkway (Greenway) at national level to local level, in particular, the Fingal Development Plan supports this greenway under Local Objective 43 and other specific local objectives. The proposed greenway complies with the policies and objectives of the Fingal Development Plan for the area without significant adverse effects on its natural and built heritage. The proposed development would not have a significant adverse effect on Natura 2000 sites and their associated habitats and species, the overall biodiversity of the area, the high landscape quality and character of the area, the visual amenities of the area, demesne landscapes and built heritage assets. The proposed development would not adversely affect existing land-uses or be injurious to residential amenity in the area. The proposed greenway provides an environmentally sustainable, high quality, safe and attractive walking and cycling facility integrated with public transport, local heritage/cultural sites, recreational/leisure/tourism amenities and urban centres. In this regard, the proposed greenway accords with the proper planning and sustainable development of the area.

lmelda Hickey

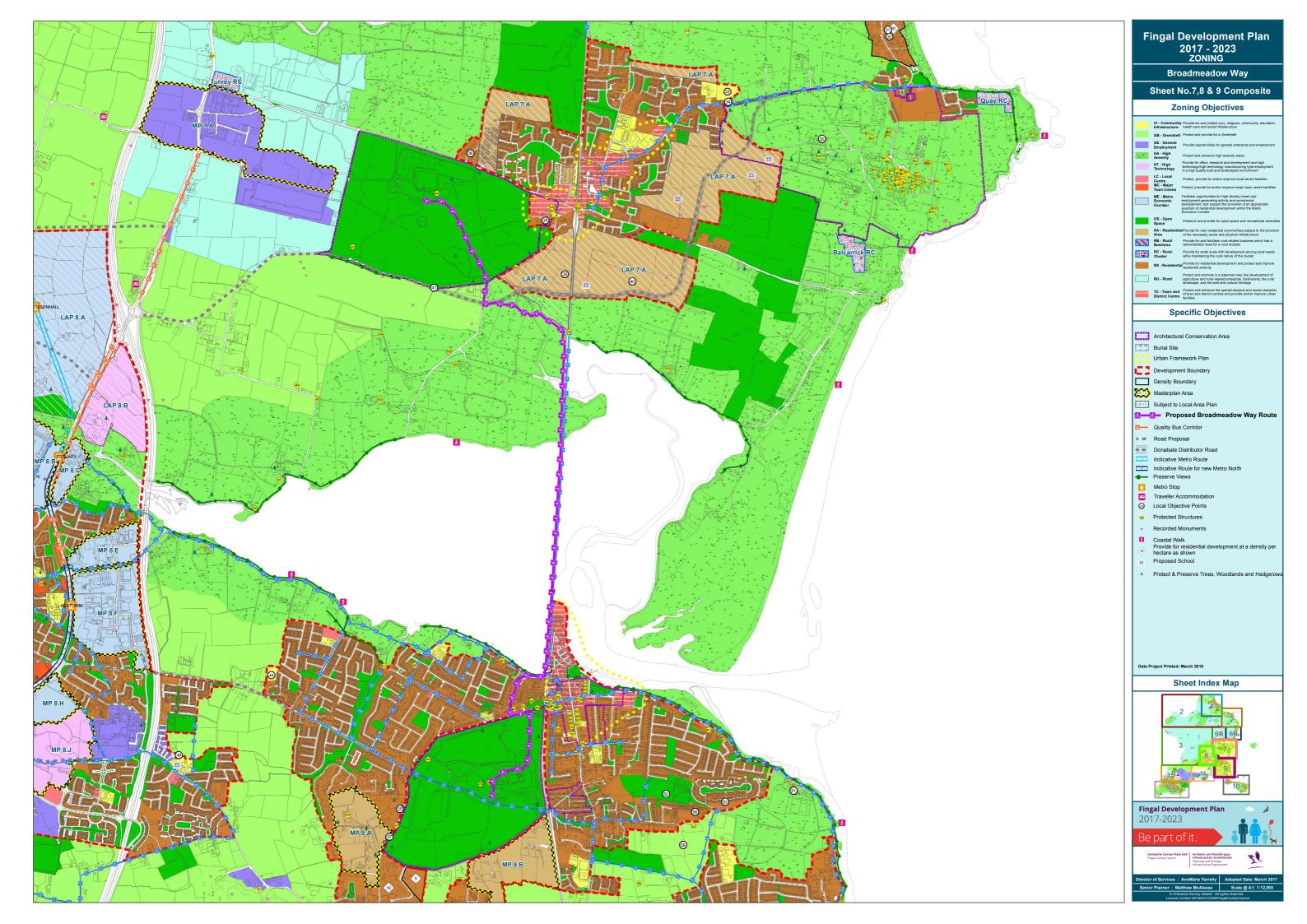
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20th May 2019

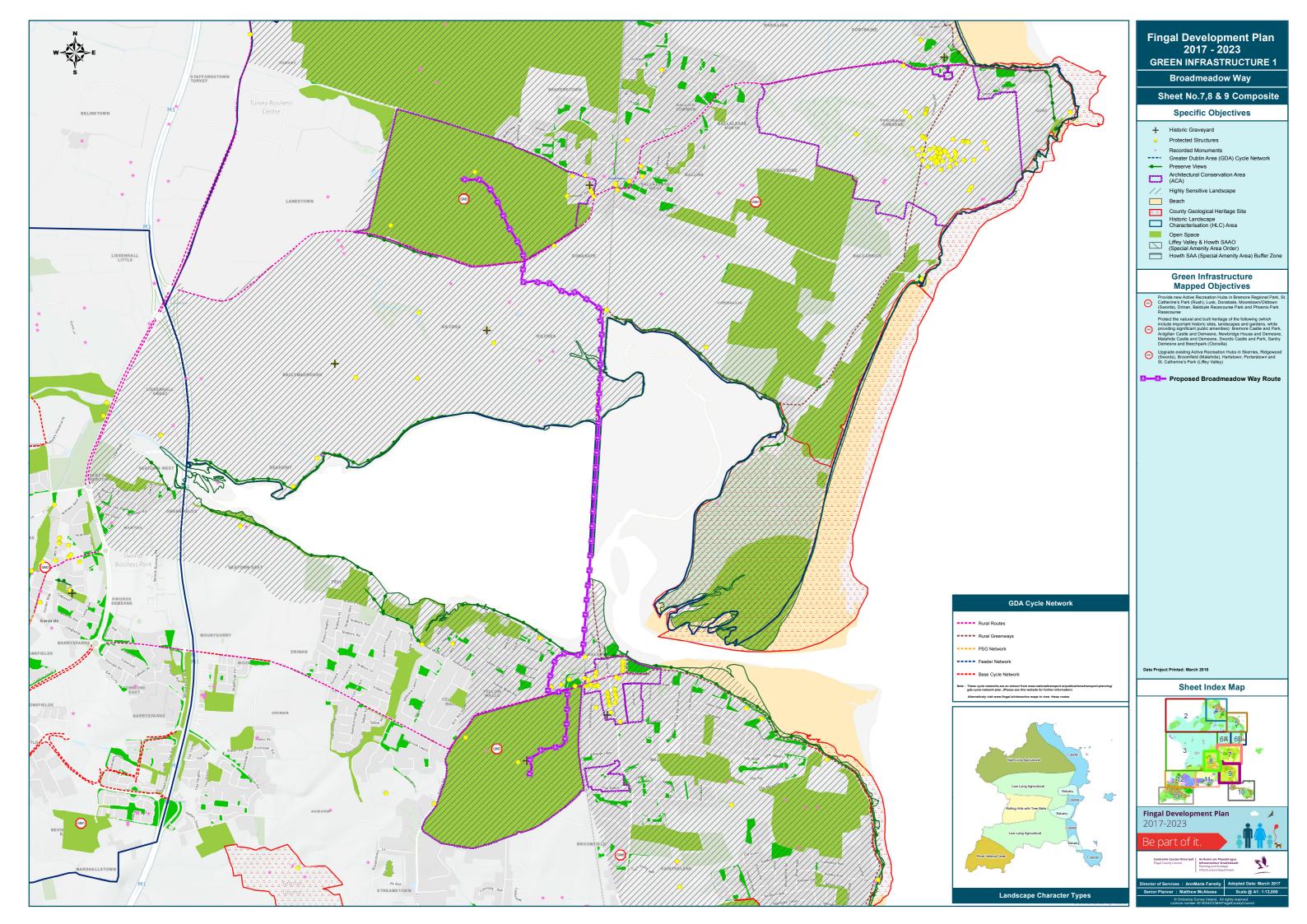
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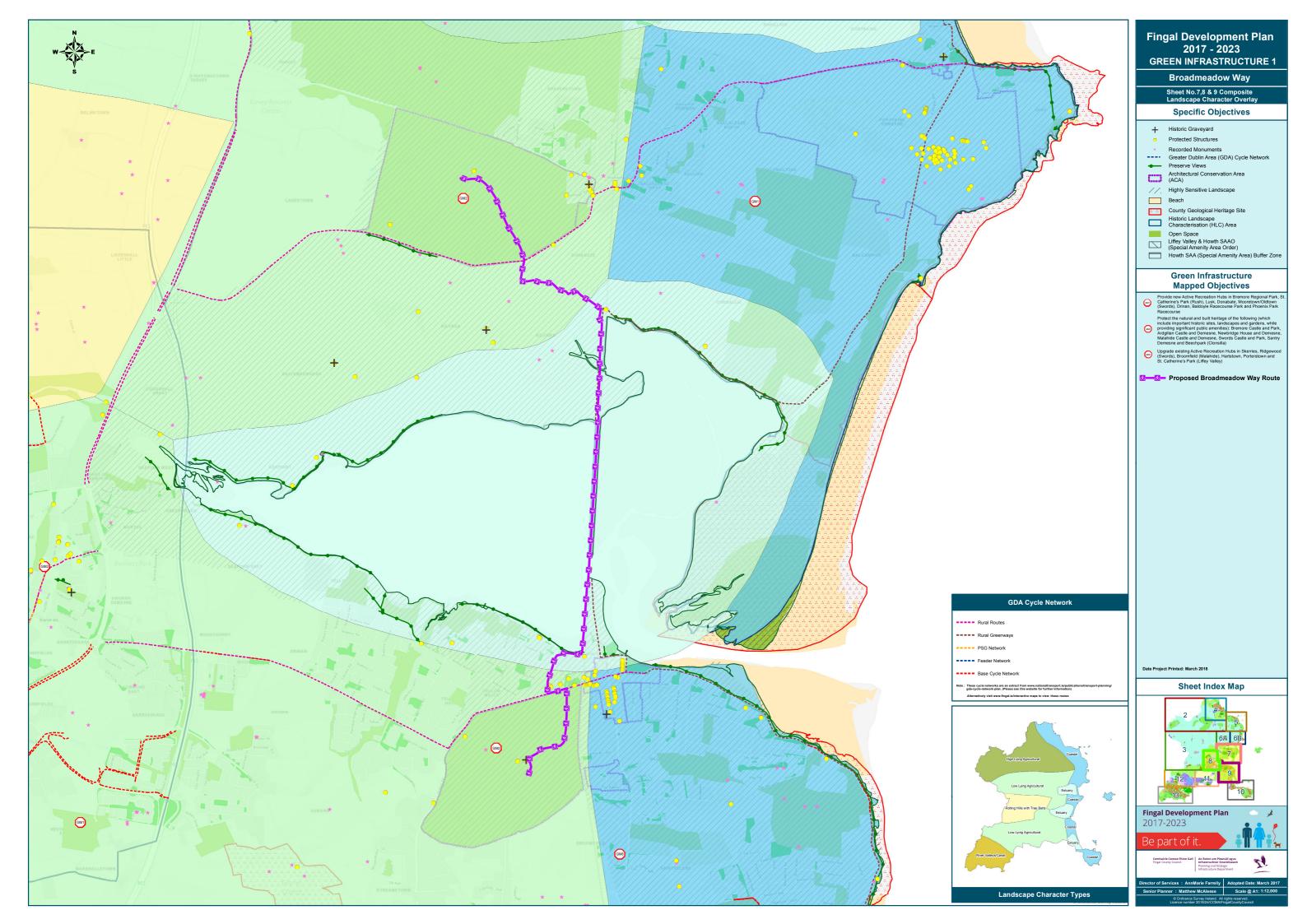
Senior Executive Planner

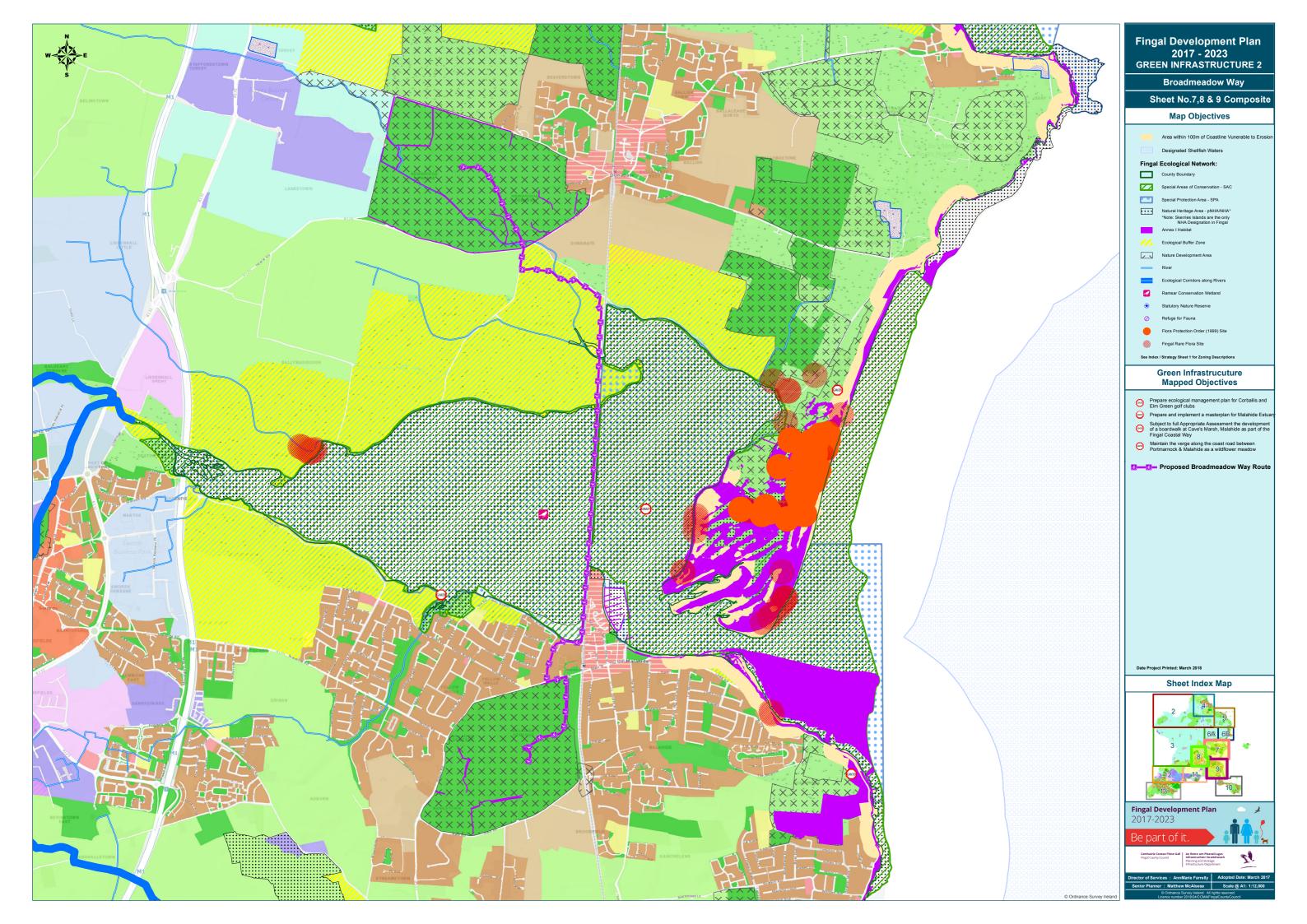
Matthew McAleese Senior Planner

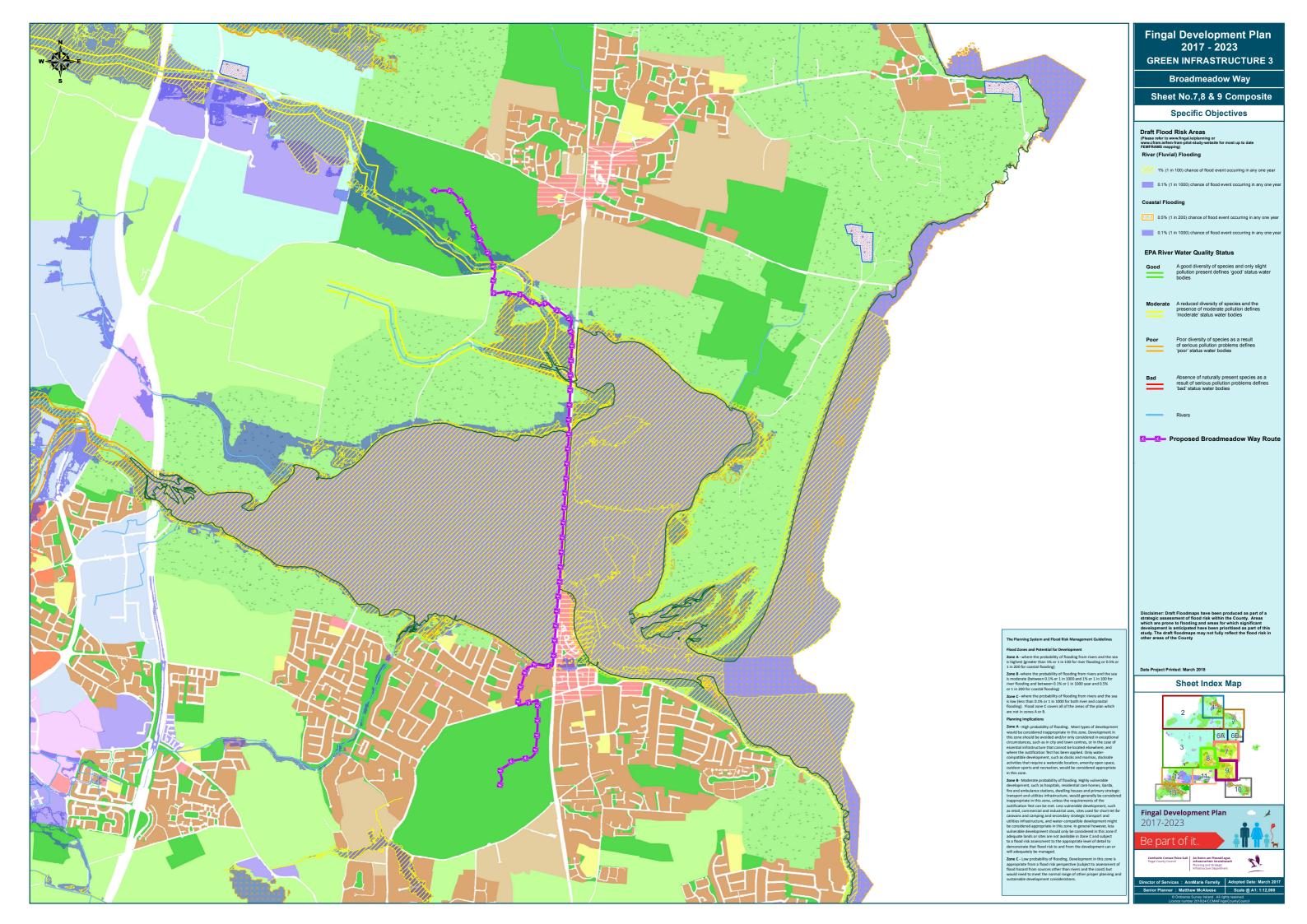
















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