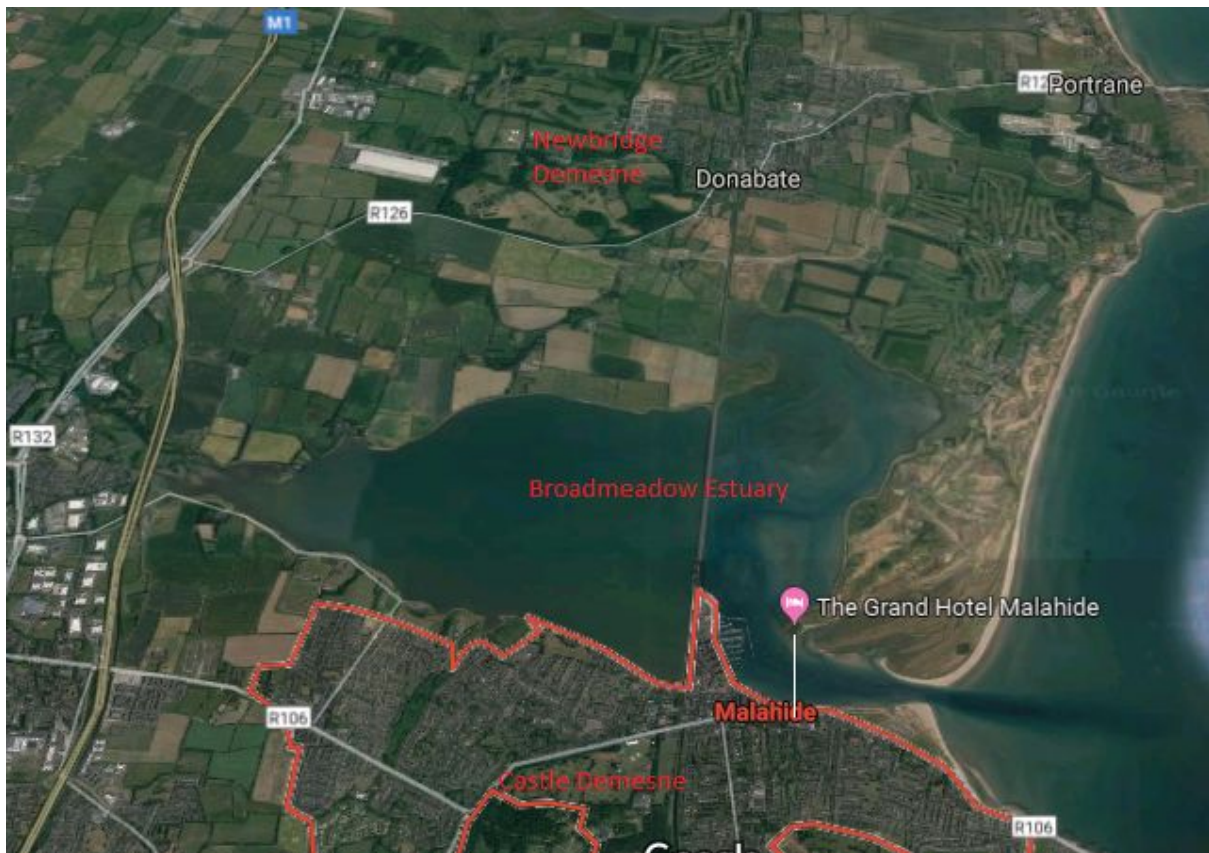


## Broadmeadow Estuary Greenway ABP Submission July 2019 - ABP Reference PL06F.304624



### 1.0 Introduction

Cyclist.ie ([www.cyclist.ie](http://www.cyclist.ie)), the Irish Cycling Advocacy Network (ICAN), is the federation of Cycling Advocacy Groups Greenway Groups and Bike Festivals on the island of Ireland. We are the Irish member of the European Cyclists' Federation ([www.ecf.com](http://www.ecf.com)). Our vision is that cycling will be a normal part of transport and everyday life in Ireland.

Once again we commend Fingal County Council for the accessibility of the information on this important greenway route in North Dublin. Fingal CC have

been at the forefront of providing online public consultation access, and other Local Authorities could learn from what they have piloted. All information is readily accessible online and the consultation portal on the Fingal CC website is readily accessible. However some confusion did arise in accessing the scheme layout drawings, which made it confusing at times to verify the critical drawings. There are 2 sets of scheme layout drawings exhibited online, both with the same titles - Overall Surface Layout - but posted with different drawing numbers?

The Natura Impact Statement (NIS) layout drawings are shown as a total of 17 drawings with drawing numbers 252 to 268 inclusive. The Planning Layout Drawings are shown separately with the same title, but as a set of 19 drawings, numbers 460 to 478 inclusive. The only differences in the layouts are in the Newbridge Demesne area where 5 drawings are used in Planning Layout drawings, as opposed to 3 for the NIS set. On top of that some of the Planning Layout drawings were not in sequence, and were difficult to find, initially presumed missing. And Drawing number 12-160-464, the section on the Corballis Cottages road, was actually missing from the set online, but this drawing is identical with the NIS Drawing Number 12-160-264, which is online!

We broadly welcome the concept of this greenway proposal from Fingal County Council, and the documentation supplied online. It has the potential, if designed to the required standard, to provide a relatively high-quality safe walking and cycling route for both the residents of north Dublin and visitors alike, even though it is limited in scope. However, we are disappointed with the lack of a 'bigger vision' for the potential of this route to radically alter regular mobility patterns and grow active travel in the region, as well as promote greater visitor numbers.

We have a number of observations on how this design could be improved to produce a high-quality route that is consistent with Transport Infrastructure Ireland's (TII) design guidelines for Rural Cycleways, the DTTAS Strategy for the Future Development of National and Regional Greenways (Greenways Strategy from here on in), the National Transport Authority's Cycle Manual ([cyclemanual.ie](http://cyclemanual.ie)), and the Design Manual for Urban Roads and Streets (DMURS). The current detailed design is not consistent with best practice at many locations, and needs to be altered to ensure the proposed Greenway meets user requirements and meets best practice.

The proposed, short greenway route will be a critical 'short cut' for both walkers and cyclists across the Malahide Estuary, and will open up a whole new range of possibilities for both leisure and commuting as outlined in the accompanying planning report.

We have outlined our points related to the route concept and design in Sections 2 and 3 below. Section 2 deals with general issues related to design approach, and Section 3 deals with specific design elements at different locations.

## 2.0 General Issues

### 2.1 Length of Proposed Route and Connections

This 6km proposed route has long been in gestation and, though relatively short, if constructed to the necessary standard will provide a critical link in the Fingal Coastal Way and in the envisaged East Coast Trail (GDA Cycle Network) that will link Dublin City with the north of the county, essentially along the east coast.

Nowhere in the accompanying drawings and documentation, is there any clear reference to these proposed future links, or how this proposed route will link into them. It is important that this short 6km route, though vital in terms of developing the connection across the Broadmeadow Estuary, is fully understood to be part of a planned network that will benefit all local communities and help to grow both commuting and leisure cycling. It is critical that the route should not be just seen as a destination for cars with bikes, but should outline how links to local communities and existing and proposed cycle and walking routes are connected. For example, Fingal County Council's funding plan for the Fingal Coastal Way, outlined at the October 2018 meeting of the Planning & Infrastructure SPC meeting, includes provision for a cyclist/pedestrian crossing of the Rogerstown Estuary. This will link the Donabate/Portrane peninsula with Rush and North Fingal, as envisaged in the Fingal Coastal Way.

It is also disappointing that this report on the proposed route has not included details of any proposed cycle routes to the local railway stations at Malahide and Donabate. There is no doubt that construction of this attractive cross estuary route will attract many leisure users, to access the route via existing DART and train services, but will also facilitate increased commuter inter modal journeys. This factor needs to be recognised and catered for in the proposed design.

## 2.2 Standards

### 2.2.1 The Five Needs of Cyclists

The National Cycle Manual ([www.cyclemanual.ie](http://www.cyclemanual.ie)), outlines in Section 1.2 of the manual the critical '5 needs of cyclists' when designing for the bicycle. These five needs are outlined as:

- Safety
- Coherence
- Directness

- Attractiveness
- Comfort

How are these issues dealt with in the proposed design?

Safety - Due to the general design width proposed of 4 metres, reduced even further in a number of areas due to perceived constraints, conflict will undoubtedly occur between pedestrians and cyclists, which could otherwise be avoided. Also, though the width of the proposed route is shown as 4 metres in most places, this is reduced to an effective width of far less in a number of areas, due to sidewalls, fencing, and close-by traffic. We refer in particular to Section 1.5 of the National Cycle Manual for guidance on this issue.

The crossings of any roadways are dealt with by Toucan crossings, which, other than our criticisms below in Section 3 related to locations of the crossings, is reasonably satisfactory.

The provision of lighting along the causeway section of the proposed route is to be welcomed and will encourage greater usage all year round, and increase safety levels.

Coherence - the route as outlined is reasonably coherent but, as stated above in 2.1, does not provide clear links to public transport or other existing and proposed routes. No attempt appears to have been made to create an alternative vision for the urban areas of Malahide and Donabate, in terms of linkages via active travel.

Directness - the route, other than on the estuary crossing, is essentially a zig-zag route that requires cyclists and pedestrians to negotiate a number of road crossings, and make a number of sharp turns. There has been no attempt to lessen these zig zags and sharp turns, by possibly acquiring some adjacent land, or reducing car parking, or even providing iconic bridge structures, which could also act as a drawing card for visitors.

The general configuration of Toucan crossings in the proposed design is treating cyclists as second class citizens in how cyclists (and pedestrians) are asked to cross at awkward angles and locations, adding to journey times. Any Toucan crossings installed need to be highly responsive to cyclists and pedestrians, to ensure the status of the proposed greenway.

Attractiveness - Overall the route is through attractive landscapes, but in a number of areas this attractiveness is reduced by the excessive use of fencing, which also further limits the actual available effective width for cycling - see Section 1.5 of the National Cycle Manual ([cyclemanual.ie](http://cyclemanual.ie))

Comfort - The provision of a tarmacaded (asphalted) surface will provide a comfortable ride for cycling, but the narrowness of the route in many areas will

reduce this level of comfort.

### 2.2.2 Route Width

We have referred to the sub standard width of the proposed route above under 'Safety' considerations and we note with disappointment the adherence to a 4 metre wide route through most of the design. The present agreed TII Guidance/Standard for Irish Cycle/Greenway Routes is 'Rural Cycleway Design - DN-GEO-03047'. This Standard recommends in Table 4.1 - see below - a Minimum (our emphasis) width of 5 metres for a high volume cycle route.

**Table 4.1 Required Cross Sectional Widths**

		Desirable Min (m)	One Step Below Desirable Min (m)	Two Steps Below Desirable Min (m)
Cycleways	Low Volume	3.0	2.0	1.75
	High Volume	5.0	3.0	2.5

There is no doubt that the likely usage/demand on this route will be very high, due to the growing local populations in the area, the potential rise in commuting, and the ease of access to public transport. The construction of this Greenway, will undoubtedly attract increasingly large numbers of cyclists and general visitors, particularly on weekends and in the Summer months, and must be designed accordingly to meet this undoubted growth in demand. This route should have a minimum desired width standard of at least 5 metres, and only be reduced in width in areas where constraints are unavoidable.

### 2.2.3 Junctions and Crossings

For this proposed greenway to match the standard of a world class greenway the design of intersections and crossings needs to be of the highest quality, and ideally cyclists and pedestrians are given top priority. This is of greater importance as we attempt to increase the numbers cycling and walking, in our national efforts to combat climate change, and is recognised explicitly in the latest Climate Action Plan, which commits to providing 10% of transport infrastructure funding to the development of cycling.

There are a number of junctions and crossings along this proposed route where the cyclist is treated as a pedestrian and is asked essentially to dismount and make sharp turns rather than being given a more direct crossing, and given priority. We comment on these locations in Section 3 below.

## 3.0 Location Specific Issues

We comment below in individual sections related to the NIS Layout Drawings in sequence as exhibited online, from Malahide Demesne (drawing 252) to Newbridge House (Drawing 268)

### 3.1 Malahide Demesne

In the demesne the proposed greenway in no way manages to meet the national TII width standards for a Greenway, where it ranges from approximately 2.8metres to 3.8metres. This exemplifies the fact that this parkland proposal appears to be ruled by Park requirements and not by Greenway guidelines. This section of the 'greenway' also does not link into any wider cycle network proposals, but is a desired local attraction destination.

We also query a Greenway designation for a route which demands that cyclists dismount, as shown in drawing 252, in the area close to the Walled Garden and retail centre.

We welcome the proposed increased bike parking areas, but would like to see specific detail of these racks and the numbers proposed.

### 3.2 Malahide Demesne and Malahide Road (Drawing 254)

Cyclist.ie, as stated above in Section 2.2 above, are critical of the zig zag nature of the proposed route in this area. We would have wished to see a more strategic vision for a more direct route for the proposed greenway, utilising the Council's CPO capabilities, or alternatively looking at an iconic high level bridge design crossing of the Malahide Road. This could have been explored either by linking directly from the Malahide Demesne area and cricket ground into Hanlon's Lane or by crossing the Malahide Road at the main entrance and linking into the private roadway of the Casino Estate and thereby via CPO to link to Bissett's Strand. This would have led to a route with less conflicts with both pedestrians and cars and necessitated little or no changes to the existing Malahide Road area.

From the draft outline it is obvious that no thought has been given to the necessary cycle link to the Malahide railway station, a critical transport hub, and that the private car is still given priority over active travel modes. This cycling design link needs to be developed as part of this proposed route, and the link into Malahide Demesne, but also to improve the cycling experience with malahide Village itself, which is car dominant.. The proposed 2metre wide pathway leading directly to the railway bridge is to be welcomed for walkers, but is unsuitable as a shared route for cyclists and pedestrians.

In terms of the presented design for the route along the short Malahide Road section Cyclist.ie is highly critical of the lack of vision, and lack of adherence to guidelines shown on this section. We fail to understand how the short sub standard shared section of the footpath can be proposed in this busy area. This design is not acceptable. Options are available to reduce the carriageway width further to at least 6metres, but this would only give a still substandard width for the shared ped/cycle section.

We fail to understand why frontages on the existing properties on the Malahide Road have not been CPO'd to provide the necessary design requirements. This is shown to be possible even though a number of the properties are listed as protected structures. It is also unclear what priorities are given to cyclists at the entrance to the Casino private development. These need to be spelt out clearly. This CPO of frontages also applies along the Hanlon's Lane narrow southern section, where CPO could provide required design width and lessen undoubted future level conflict.

Greater clarity needs to be given on the Malahide Demesne proposed entrance crossing, as to how other vehicles are treated. Cyclists will be entering and leaving the Park here, and positioning of the crossing, and movement of cyclists in both east and west needs to be factored in, as the design outline demands very tight turns from cyclists and will undoubtedly result in conflict with pedestrians. We welcome the proposal to install bike parking into the existing car park.

### 3.3 Hanlon's Lane (Drawing 255)

Comments above in 3.2 in relation to the narrow sections of Hanlon's Lane apply. If this section is to remain part of the designated route the narrow areas need to be widened, and any further traffic restrictions necessary should also be applied. We welcome the retention of the bollards on this lane.

### 3.4 Bissett's Strand (Drawing 256)

There are a number of disappointing aspects to the proposals outlined on this drawing, which we outline below.

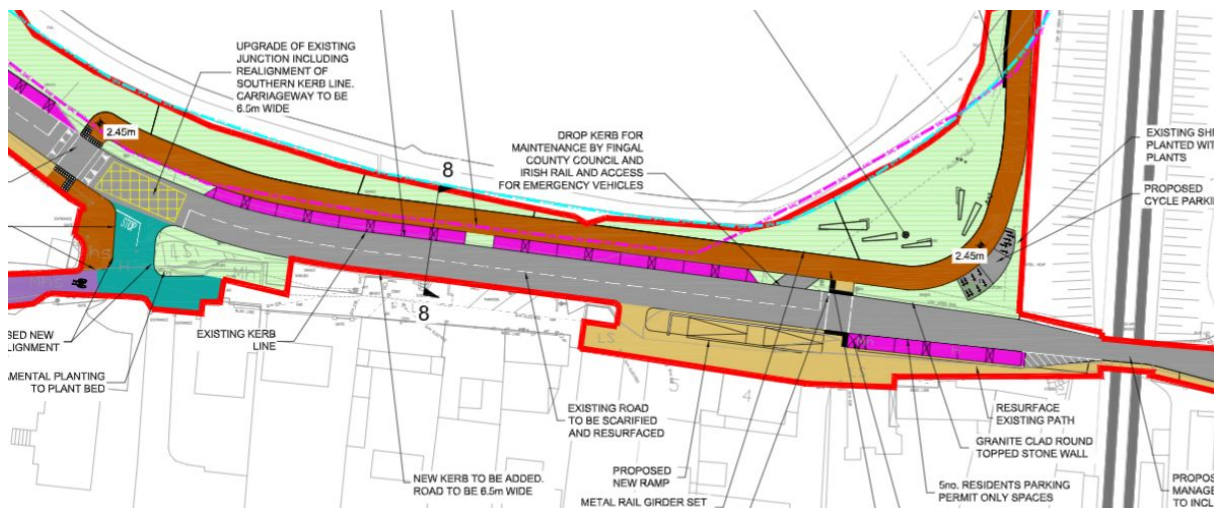
The entrance/exit design for cyclists and pedestrians at Hanlon's Lane/Bissetts Strand is unacceptable in that it takes cyclists and walkers offline, treating them as 'second class citizens'. There is ample room to redesign this junction giving clear directness to cyclists and walkers, and ensuring their overall safety, while at the same time making a definitive statement and possibly introducing a distinctive public realm feature.

The most disappointing aspect of the Bissetts Strand proposed design is the proposed increase in car parking in the area, while limiting the width of the proposed greenway track, and without any buffer proposed between the proposed parked cars and the greenway. This can be seen directly in the images below from

the existing to the proposed.



Aerial Google Photo of Existing arrangements at Bissetts Strand



Extract from Drawing 12-160-256

As the 'before' and 'after' images clearly demonstrate, priority in the design of this proposed greenway has clearly been given to car usage, and not to greenway usage. This is unacceptable.

We also note the omission in this section of access to the proposed greenway from Malahide Village via the railway bridge, despite the proposed provision of cycle priority through the Railway Arch, as shown on the drawing. No provision has been made to access the Greenway west of the Railway Bridge.

### 3.5 Weir Maintenance Track (Drawing 257)

This section of the proposed greenway is the only section of this route that meets the recommended width for a greenway under TII guidelines. While this is welcome to see, we query the proposed wall structure and materials which is not specified. It should be in keeping with the upgrade of the route to a world class greenway.



We note the inclusion of the security fence between the railway and the greenway. We would recommend the inclusion of planting on the inland side of this fence, to soften the industrial edge, and to be in keeping with the overall design of the greenway.

### 3.6 Causeway Bridge Details (Drawing 258)

Cyclist.ie would like to ascertain was there a restriction on the proposed width of the bridge section, due to loading of the supports? If not we would wish to see an increase in the width of this section to the recommended 5metres in line with national standards.

We are unsure, based on exhibited drawings, if a steel mesh fencing is proposed on the inland face of the bridge deck, as it is on the railway side? We would also wish to ensure that any mesh proposed would not be of an industrial variety, and have some aesthetic qualities for this unique route. Overall we would like to see the design of the bridge examined to reflect this iconic status and to be an attraction in itself. From the drawings exhibited it does not appear that this approach has been taken.

We would also recommend that the 'viewing area' proposed in Section 10-10 include some form of art feature or sculpture to reflect the sailing or biodiverse nature of the estuary itself. This will also help to attract visitors.

### 3.7 Northern Causeway Details (Drawing 259)

Similar to southern access to bridge, we recommend softening of the security fence with some planting.

### 3.8 Northern Causeway Links to Corballis Cottages Road (Drawings 260,261,262, 263)

This section is relatively straightforward, and differs from an original proposal which diverted the route along the banks of the River Pill.

Section 13-13 shows 2 security fences between greenway and railway, which we feel is unnecessary, and industrialises the greenway. We also recommend softening of the security fence with some planting.

Section 14-14 also shows 2 fences with planting between. We suggest there is no need for the proposed wooden fencing on the east side of the greenway, and removing it will add to the experience.

No cross section is given in drawing 261 so it is not clear what the fencing arrangement is. This needs to be clarified

Section 16-16 once again shows a double fence arrangement on the eastern side of the greenway, with planting in between both fences. We suggest the wooden timber fence on this side be removed as being unnecessary.

The link for cyclists to the Corballis Cottages Road and the Coast Road requires the upgrading of the proposed pedestrian crossing to a Toucan crossing. The coast road is, and will continue to be, a major cycling attraction which will be amplified by the provision of the cross estuary greenway.

We are happy to see some provision included for a future link to Donabate from this location east of the railway bridge on the coast road.

We fail to understand the proposal to increase the width of the existing road in this area, which is a relatively low traffic area to a 7.5metre cross section, particularly in the context of the major railway bridge constriction. This proposal needs to be reviewed, as this increased width will only encourage increased vehicle speeds.

### 3.9 Railway to new Donabate Distributor Road (Drawings 264,265)

The comment in section 3.8 above in relation to proposed road width applies here also.

Sections 19-19, 21-21, and 22-22 once again shows a double fence arrangement on the greenway, with planting in between both fences. We suggest the wooden timber fence on this double fence side be removed as being unnecessary.

### 3.10 Donabate Distributor Road to Newbridge House (Drawings 266 to 268)

We are unhappy with the zig zag proposals for the toucan crossing of the 'under construction' Donabate Distributor Road, and wish to see a review of these arrangements to produce a simpler more direct crossing. One option would be to consider the construction of an overbridge from the new Greenway directly into the shared road on the northside?

While appreciating the narrowness of the shared road we feel that the proposal to share with traffic in this area is acceptable, particularly as the road is only accessible to local inhabitants, and due to the surrounding natural hedgerows.

Once again the proposal to take the cyclists and pedestrians 'offline' at the proposed crossing of the Hearse Road is unacceptable. The crossing route needs to be simple and direct, and priority being made clear for the Greenway. This crossing requires redesign.

The final section from Hearse Road to Newbridge House is of an unacceptably low standard for a greenway, and should be upgraded to cater for increased cycling traffic and in order to reduce cycling/pedestrian conflict.

The ongoing proposed connection to Donabate Village and train station should ideally be part of this proposal. This, as stated in Section 2 above will be a critical element in both local and visitor mobility.

## 4.0 Conclusion/Summary

While Cyclist.ie broadly welcomes the concept of the proposed greenway and in particular the long awaited crossing of the Broadmeadow Estuary, we are disappointed with a number of critical elements , as outlined above. In particular these are:

- 1 No inclusion of links to main urban settlements, transport hubs, and existing or proposed cycle routes.
- 2 A lack of vision in a number of areas which, through the use of CPO powers, could have resulted in a more direct and attractive greenway, and the introduction of visitor attracting features.
- 3 Lack of adherence to the national recommended greenway standards, particularly in the below standard widths, and ignoring of major elements of the national cycle manual.
- 4 Treating cyclists as pedestrians at the majority of road crossings, all of which need to be upgraded.
- 5 The possibility of creating a specially attractive bridge crossing of the estuary, which would make a statement on the route.

We look forward to engaging with An Bord Pleanála and Fingal County Council on any of the above issues, and are available to discuss if required.

Yours

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