54, Páirc Éabhóra,  
Beann Éadair,  
Co. Bh.Á.C.

[www.davidhealy.com](http://www.davidhealy.com)

@davidhealyv

+353 87 6178852

An Bord Pleanála,

64, Marlborough Street

Dublin 1

**Re: Greenway between Malahide Demense and Newbridge Demense, PL06F.304624**

A chairde,

I refer to the above application and wish to make the following observations.

This proposed greenway is a very important and long overdue piece of local transport infrastructure, serving both an amenity function and a transport function. It is a vital part of a wider active travel network which needs to be provided to facilitate walking and cycling in the area. It will also be a major public amenity. The provision of high quality facilities to enable sustainable transport modes is an essential element of the transition to a low carbon economy which both the Board and Fingal County Council are required to have regard to by law.

Therefore I urge the Board, ultimately, to grant this permission.

However, there are significant flaws in the current application, particularly as regards the design for the safe movement of people by bicycle and walking. Additionally, I am concerned about the visual qualities of the proposed design. These aspects need to be addressed. Whether that is by seeking further information or by way of condition is something for the Board to consider. If the Board decides to hold an oral hearing on this important piece of infrastructure which could ensure high quality design and I would be happy to participate.

1. Design for safe walking and cycling

Dublin Cycling Campaign has submitted a detailed analysis of the design of the proposed route. I agree with its analysis as to the multiple design flaws which it correctly identifies as needing to be fixed.

The only comment I have about the quality of the design as regards use by cyclists and walkers additional to those from the Cycling Campaign is about the heights of walls described as "wind protection walls" and bridge parapets. (I couldn't find any explanation as to what wind protection is required. Elsewhere in the documentation walls are described as being desirable to shield birds from view of passing people and dogs.) The height at Section 9-9 of the overall surface layout sheet 6 is 1.4m where the greenway is 5m. At section 11 where the greenway width is 4m the wall height is 1.1m. I have no expertise in this area but I'm conscious of the facts that people cycling typically have a higher centre of gravity so would need higher parapets and that a narrow route will put users closer to the parapets. Some of the relevant issues are described in Sustrans Technical Information Note No. 30 *Parapet Heights on Cycle Routes*  a copy of which I attach and which can be found at

<https://www.yumpu.com/en/document/read/26935786/parapet-heights-on-cycle-routes-2012-sustrans>

I urge the Board to ensure that it has the necessary technical expertise available to it in considering this application; an advisor with experience of similar routes in countries with decades of cycle design experience such as the Netherlands would be appropriate.

2. Aesthetic qualities

The greenway is an intervention in a scenic natural landscape, and the views from it will be part of the draw for amenity users. As a daily user of the Sutton to Clontarf coastal route, I'm conscious that the natural coastal landscape is also a daily benefit for transport users as well.

Having seen similar cycle routes along railway bridges elsewhere, particularly the Netherlands, I am conscious that this greenway could be an attractive addition to the local environment. I'm quite concerned that the visual impact of the chosen design has not been clearly set out in the application. I urge the Board to ensure that a high quality of form, materials, texture and colour is used for the aesthetic benefit both of people using the route and those viewing it from the adjacent shores and the water.

Similarly the lighting should be designed to minimise its visual impact; I welcome the proposal that the lighting be demand responsive. It seems that lighting set in a rail along the parapet could be equally effective and less visually obtrusive.

In addition to the bridge itself, Similar concerns apply to the fencing which seems to be excessively used along the route and which the Dublin Cycling Campaign submission has already effectively queried. The nature and visual appearance of the fencing is sometimes unclear from the application documentation.

3. Pressure-treated timber

I note the proposal to use pressure-treated timber fencing and wonder if this has been assessed for its impact on the Special Protection Area.

Thank you for considering the above input.

Best regards,

Cllr. David Healy