

54, Páirc Éabhóra,
Beann Éadair,
Co. Bh.Á.C.
www.davidhealy.com
@davidhealyv
+353 87 6178852

21st March 2018

An Bord Pleanála,
64, Marlborough Street,
Dublin 1

Response to public consultation on **Baldoyle to Portmarnock Greenway** Case reference:
PL06F.300840

I wish to strongly support this application. The proposal is for a high quality greenway through amenity and greenbelt zoned lands. It will provide a safe and pleasant link for travel between Baldoyle and Portmarnock. In recognition of the large numbers of users which are anticipated, it has correctly been designed with segregated paths for people walking and people using bicycles.

I have some comments on the details of the design and I would ask the Board to require alterations to the design or to impose conditions to take account of these issues.

1. Lighting

Excessive public lighting is a significant environmental problem. Please see the attached presentation from Professor Brian Espey https://www.tcd.ie/Physics/news-events/events/light@night/abstracts/pdfs/Espey_LAN_20Apr2016_for_web.pdf (Appendix 1.)

The biodiversity analysis carried out for the project identified that lighting is a particular problem for the bats in the area. The recommendations were as follows:

Mitigation of Potential Impacts

It is recommended that the following guidelines are followed to avoid any disruption to bat fauna, if additional lighting is proposed along the route for pedestrians / cyclists:

- Avoid lighting along the rivers or the seafront / mud flats.
- Avoid the use of mercury or metal halide lamps.
- Minimise light spills using shields, masking & louvres and Keep light columns low.
- Restrict lights to ensure that there are dark areas away from the immediate required area.
- Restrict lights to ensure that there are dark hours i.e. a curfew for example after which lighting is reduced (e.g. 11.00 pm).
- The source of light should be Light Emitting Diodes (LEDs) as this is a narrow beam highly directional highly energy efficient light source. The lighting should allow for a light level of 3 lux at ground level. This low lighting is thus easier to control both the direction but also the actual light level because it is so close to the target area.
- Lighting should preferably respond to a trigger (motion sensor on approach of cyclists / pedestrians) and be capable of dimming.

The route goes through land zoned in the County Development Plan as High Amenity and as Open

Space. It is recognised in the Plan (Table LC01) as a Landscape of Exceptional Value and High Sensitivity. The importance of the landscape is further recognised in the Objective (NH43) to consider a Special Amenity Area Order for the Baldoyle and Portmarnock area.

Both of the Local Area Plans recognise the impact of lighting on wildlife and landscape. They zone the area through which the route passes as an Intrinsically Dark Landscape (Figure 5.57 of Baldoyle Stapolin LAP and Figure 5.10 of the Portmarnock South LAP.)

The Portmarnock South LAP contains the following as regards this route:

Consideration may be given to limited low level lighting along the proposed coastal route given that this route will also function as a commuter route between Baldoyle and Portmarnock. This is, however, subject to Appropriate Assessment and assessment of bird movements within the plan lands and the wider area during dark hours.

Despite the above considerations against lighting or towards minimising lighting, the scheme proposes 6m lighting standards.

The visual/landscape assessment in the application does not consider the visual impact of these lighting standards either during the day or at night.

It is correct that this route will be both an amenity and a transport route. It will be used to access places of work and education and will be used after dark. However there is no explanation as to why lighting would be required for safe use after dark on the two main stretches of greenway. i.e. away from the three junctions in the scheme - at the northern and southern ends, and at Mayne Road. These are stretches without junctions, curves or other sources of traffic conflict, in which pedestrians and cyclists are on separate paths. No case has been made that lighting is necessary at all.

If lighting is to be provided it should be low level, directed at the ground and triggered by the approach of greenway users. The options for low level lighting include

- Illuminated and reflective markers set into the greenway surface. For example: <https://www.cyclehoop.com/product/access-infrastructure/solareye/> (Appendix 2) or an innovative approach such as <https://www.smithsonianmag.com/innovation/follow-the-glow-in-the-dark-road-5259844/> (Appendix 3).
- Low level lighting from bollards set off the path.

The use of lighting triggered by approaching people has been successfully demonstrated in other locations, particularly environmentally sensitive places. See, for example, this report on the lighting between Den Bosch and Vlijmen: <https://bicycledutch.wordpress.com/2018/01/09/lights-that-switch-on-just-for-you/> (Appendix 4) and this report on a path in Kalundborg: <https://www.seas-nve.dk/~media/2-0-seas-nve/pdfer/privat/light-on-demand-engelsk.ashx> (Appendix 5.)

2. Detail of greenway surface

a) Red for cyclists, black for pedestrians.

Providing different coloured paths for different users will assist in directing each to the correct path. It is important to learn from the experience of parallel paths elsewhere in Dublin where collisions

have resulted from confusion as to which users should be on which path.

It is essential that this is done by the use of red tarmac and black tarmac, not by the placing of a surfacing on top of the tarmac as this seems to always result in an uneven surface and frequently breaks up due to winter conditions.

b) Edging to ensure greenway edges are not overgrown by grass.

The stretch of greenway between the Bull Island Causeway and Blackbanks has no particular edging where the tarmac meets the grass. The result is that grass grows over the edge of the tarmac and narrows the route.

Brick, concrete, or similar edging should be placed on the edges to ensure grass/vegetation doesn't encroach on the greenway and to provide a clear edge for maintenance. The edging should be flush with the surface to reduce the risk of destabilising any cyclist whose bicycle wheel comes into contact with it.

c) Adequate foundations and construction.

Inadequate compaction beneath the cycle track sought of the Wooden Bridge is leading to sinkholes in the surface.

The greenway construction must be on a stable foundation including being capable of bearing the heavy vehicles which will construct the greenway and which will be used to maintain it.

Thank you for your consideration of these observations. I urge you to approve the scheme subject to the above amendments/conditions.

Regards,

Cllr. David Healy