

**Submission of
Councillor Barry Ward
to
the Public Consultation in relation to
Sandymount/Merrion to Blackrock Corridor
Study**

16th December 2016

I am a Councillor on Dún Laoghaire Rathdown County Council since 2009 representing the Blackrock area and am Chair of the Joint S2S Committee that was established between Dún Laoghaire Rathdown County Council and Dublin City Council. I make this submission in a personal capacity, but mindful of my involvement in that Committee and in the S2S project.

S2S

1. In the first instance, I refer to the beginning of the document and the introductory chapter in which it is noted in Paragraph 1.1 that it has been an objective for many years to develop a continuous coastal recreational promenade and cycleway from Sutton to Sandycove and that the project, the subject of this consultation document, was “previously referred to as the Sutton to Sandycove (S2S) Promenade and Cycleway Scheme”.
2. It is extremely important to note that the route described in the consultation document is not the S2S and does not bear any real resemblance to the S2S in circumstances where the S2S is specifically designed to be a coastal promenade and cycleway. All of the route described in the consultation document in terms of its cyclability is away from the coast and only a small portion of the route, i.e. the walking path between Seapoint and Blackrock, is actually on the coast.
3. Hence, it is erroneous and misleading to describe this project as previously having been referred to as the S2S, it is not and it does not reflect it.
4. The S2S Scheme and project is an extremely important feature of development plans in both Dún Laoghaire-Rathdown County Council and Dublin City Council going back for a long number of years. It is a project that enjoys almost unanimous support from local elected representatives, national elected representatives and the communities that it touches along the route it takes between Sandycove and Dublin City.

5. The suggestion that it can be supplanted by what amounts simply to improved cycle facilities on road between Seapoint and the city centre, is false and myopic.
6. Furthermore, at Paragraph 1.4, it is a stated objective of this public consultation document that the intent of the Sandymount/Merrion to Blackrock Corridor Study is to identify an environmentally acceptable and cost effective scheme that delivers the objectives of the East Coast Trail (S2S) between Ringsend and Sandycove. This consultation patently does not do that because this is not a coastal promenade and the “objectives” of the S2S are entirely that it would be coastal.

Coastal communities

7. The space that exists along the DART line between Merrion Gates and Blackrock, and beyond that to Seapoint, is a space that is currently *de facto* cut off from the local community.
8. Notwithstanding the fact that Booterstown, Blackrock, Monkstown, Seapoint, Dún Laoghaire are coastal communities, large parts of them are cut off from the sea and from the coastline that runs alongside of them.
9. The only access points between Merrion Gates and Blackrock Village to the sea are at Booterstown DART Station and at Blackrock Park and Blackrock DART Station. As a result, the public at large is denied *de facto* access to the sea side of the DART line and the coastline that exists there. This is an amenity that should be available for the enjoyment of the local community and the wider community on an ongoing basis, but the public consultation document as currently constituted continues to deny them access to that facility.
10. Interestingly, no such issues arise at Sandymount and beyond Merrion Gates where there is already in place a promenade and rock armour at Sandymount Strand, and along Strand Road and up to Beech Road where there is easy access to the coastline and the enjoyment of the local community of that coastline is obvious to see on a daily basis.

Previous studies

11. At Paragraph 1.3, reference is made to previous studies and I welcome the acknowledgement that the Scott Wilson report that was developed and the attending estimate of a price tag of €75 million reflects prices of 2010 and before which are clearly inflated beyond what is a reasonable estimate of how much the cost of this scheme will be.
12. I am particularly concerned about the reference to the recommendations in this report on Page 4 of the Public Consultation document which makes reference to “meetings with the National Parks and Wildlife Section of the DEHLG and An

Taisece”. Arising from these meetings, it appears that it is recommended that an inland route is further explored and that appears to be the genesis of the public consultation in this document.

13. It also appears that at no point did the National Parks and Wildlife Service make a written submission that has been publicly disclosed or put down on paper for anyone to criticise or even consider the basis on which an inland route would be preferable to the sea side or coastal route. This would appear to be inconclusive because it doesn't allow anyone to consider the basis on which an inland route is dictated as being somehow superior or necessary in the context of the S2S.

Overriding public interest

14. While I acknowledge that there is clearly an issue with development within an SPA or an SAC and that the strip of land between Merrion Gates and Blackrock Village clearly falls into that category, it must be considered in the context of the overriding public interest of such a scheme and the benefits that it would bring both to the local community and the community of the greater Dublin area.
15. When one considers that over 1.2 million people walk the East Pier in Dún Laoghaire every year, a pier which goes nowhere, the value of a commuter and recreational amenity along the sea side between Blackrock and Booterstown cannot be overestimated, both in terms of its recreational health facilities, but also as a commuter route in and out of town for cyclists.
16. This year we noticed a 49% increase in cycle journeys on Rock Road, along the corridor where this public consultation purports to improve cycle facilities and while it is laudable to improve cycle facilities along this route, particularly in the context of increase usage, it is my submission that it is far superior to create a separate safe space for cyclists along a coastal route which will allow them to avoid interaction with cars altogether, and therefore improve their safety, improve the health of the route and improve also the ease of access to and from the city centre for people living in the coastal communities along the S2S.
17. At Paragraph 2.2.1 of the document, it is noted that the areas of Dublin Bay and Booterstown Marsh are recognised as being of high environmental importance. I do not believe that the proposed S2S route along the coast disturbs, certainly not the Marsh because it is outside the DART wall and therefore would not interfere in any respect with Booterstown Marsh, but equally Dublin Bay, because the proposed route for the S2S would be above the high water mark, or at least could be with some imagination, and would not interfere with the area covered by the SPA or SAC designations of Dublin Bay or indeed the Dublin Bay biosphere.
18. Equally, I would suggest that there has not been enough investigation as to how to deal with the issue raised by the Habitat's Directive, specifically whether alternative lands could be found to replace what habitat is deemed to be lost by

the construction of the S2S in adjacent areas in Dublin Bay or close by in other coastal areas.

DART Sea Wall

19. It is an acknowledged fact that the sea wall along the DART line between Merrion Gates, through Booterstown to Blackrock is in a poor state of repair. It is an old wall and is subject to likely failure in the near future.
20. In those circumstances where sea levels are rising, albeit slowly, and there are already issues with the proximity of the DART to the sea and the affects that the sea has on the wall adjacent to the DART, it is entirely foreseeable that that wall will have to be reconstructed in the coming years.
21. If that is to be the case, it also makes sense that a promenade and cycleway could be built in conjunction with the reconstruction of the wall which would occupy the same footprint as the wall and therefore not interfere any more than is already the case with the wildlife in the SPA and SAC.
22. In fact, such is the nature of the seafront and foreshore at that point that anyone who does choose to cross over the bridge at Booterstown DART Station or access the strand at Merrion Gates, now does so into the SPA or SAC with dogs, with whatever else they might choose to walk along there with.
23. As a result, the feared interference with the wildlife in the SPA and SAC is already happening and in fact a coastal S2S built in the footprint of the DART wall is a ready opportunity to marshal people who want to use the seafront into a particular area and therefore reduce their impact on any environmental considerations that might legitimately exist.

Roosts

24. It is contended by a number of agencies that there is bird wildlife in the area that will be damaged by the construction of a coastal S2S along the route proposed by the S2S group. The reality is that the birds only use the part of the area where the S2S would be built at times when the tide is high and then they use the sea wall of the DART as a roost when the water is such that they can't sit on the strand.
25. If this is deemed to be an issue and if it is felt that an alternative roost must be provided for the birds or that the construction of the coastal S2S would interfere with the habitats of the birds to such an extent, then it is readily remediable or it can be readily remedied by the construction of additional roosts for the birds above the S2S and out of the reach either of, for example, dogs or people who might be using the S2S. It would simply be a matter of creating either poles or a continuous roost along the route that would substitute for the birds the wall that they will lose.

26. The reality is that a little bit of imagination goes a long way towards affording the opportunity for a coastal route rather than an inland route which totally fails to understand the importance of the S2S and the basis on which it was made a coastal route in the first instance.

Seapoint Avenue

27. The proposal to make Seapoint Avenue one-way is very worrying and presents a number of problems. It appears that no traffic study was conducted to assess the safety or workability of this proposal.
28. Firstly, Seapoint Avenue is a major, arterial route in and out of Dún Laoghaire town. Any suggestion that it should be altered in terms of its traffic flows must be examined in the context of the knock-on effects it would have on access to the town and the consequent damage to the local economy.
29. Furthermore, making Seapoint Avenue one-way will divert significant volumes of traffic on to Monkstown Road and through Monkstown Village. Dún Laoghaire-Rathdown County Council has expended considerable effort and money designing a new scheme for Monkstown Village, which will attempt to reconfigure traffic in the village in favour of cyclists and pedestrians.
30. Changing the traffic flows around the village, and particularly, stemming the main orbital route around the village, would undoubtedly compromise this work and potentially disrupt the fabric of a delicate village economy.
31. It also makes it difficult to see why any traffic would enter Seapoint Avenue at the Blackrock end, if it would only have to turn up Alma Road a few hundred metres later. Traffic would most likely continue from Frascati/Temple Roads directly onto Monkstown Road, rendering Seapoint Avenue useless and massively increasing already difficult traffic volumes on Monkstown Road.
32. Finally, Alma Road is a quiet residential road that is unsuitable for large, increased volumes of traffic. It is used by parents to drop-off and collect children attending nearby Scoil Lorcán (access to the school is through a pedestrian lane), and the sightlines for traffic joining Monkstown Road are very poor.
33. This aspect of the plan is ill-conceived and would be much better dealt with by locating a coastal route, on the sea-side of the DART line for cyclists between Seapoint/Brighton Vale and Blackrock DART Station.

Route from Seapoint to Blackrock

34. The proposed coastal footpath between Seapoint and Blackrock DART Station is to be welcomed.

35. This space is desperately underused and it would be a wonderful amenity for it to be usable (even if only as a footpath) along this secluded route. There is ample foreshore here, which is largely unknown to local residents because of its inaccessibility, and it would be of great benefit to the local community to have the use of this space.
36. There is already a very developed, contra-flow cycle route along Newtown Avenue, between Blackrock Village and the end of Seapoint Avenue, and it would appear that it is proposed to continue this onto Seapoint Avenue as far as the junction at Brighton Vale.
37. While this is a welcome idea, I reiterate that it would be far more feasible and progressive to place this route on the coast.
38. At Blackrock Village, it is very much a positive suggestion that the land on the sea-side of Maretimo Gardens, where there are several structures of architectural interest, would be opened up to a pedestrian route.
39. Access to the sea at Blackrock Village, while already in place, is discouraged because of the paucity of safe footways outside the DART wall and the lack of connectivity with adjacent areas (such as Seapoint). This is an important connection towards Dún Laoghaire and has my full support.

Deepwell and access to Blackrock Park/Village

40. The proposal to widen the lane at the back of Deepwell, adjacent to the DART platform at Balckrock, is very encouraging.
41. The purchase of a strip of land at this point was previously at an advanced stage by Dún Laoghaire-Rathdown County Council, but is, in any event, an important step in making an accessible link for cyclists and pedestrians between Blackrock Park and Blackrock Village. This also represents an opportunity to widen the DART platform at this point (for Northbound trains).

Cycle path through Blackrock Park

42. Physical segregation between cyclists and pedestrians in Blackrock Park is very important, particularly if this route is to be encouraged for commuter cyclists. While many park-users will recognise clearly demarcated foot/cycle paths, clearly, children and dogs will not recognise the significance of the difference between such lanes.
43. In order to ensure the safety of all users of this route, a physical barrier is required to distinguish between the space for cyclists and pedestrians.

44. It might be worth exploring connectivity between Rock Road (at the Circus Field) and the cycle/foot path through Blackrock Park. This would be of particular use to students of Blackrock College and would make it easy for cyclists on Rock Road to opt for a safer route through the Park.

Rock Road between Booterstown DART Station and Merrion Gates

45. I welcome the two-way cycle system between Williamstown Park/Booterstown DART Station and Merrion Gates.
46. Specifically, I support any works that improve continuity of provision of cycle facilities between the respective functional areas of Dún Laoghaire-Rathdown County Council and Dublin City Council (at the junction of Trimleston Avenue), as there is a dramatic change in the safety of the road at this point for cyclists.
47. Rather than the suggested buffer between the vehicular traffic lanes as shown in the diagram on Page 42 (Map 14), I would suggest that the tree-lined buffer should be located between the two-way cycle lane and the vehicular traffic; this would create a much more important buffer between cars/buses/HGVs and cycle traffic.

Closure of Merrion Gates and alternatives

48. I welcome the closure of Merrion Gates. This action will allow for increased DART frequency and improved traffic flows along Merrion Road, which will benefit all kinds of commuter.
49. The cycle underpass design is, in my opinion, flawed. We have, in the last few years, closed pedestrian/cycle underpasses in Blackrock, at Mount Merrion and Carsfort Avenues because they were dysfunctional.
50. It is extremely important that there are clear sight lines through the underpass to allow for increased safety and foreseeability for all users. In the absence of such measures (which are common in similar schemes throughout Europe) the underpass simply will not be used
51. Additionally, there must be segregation between cyclists and pedestrians within the underpass to avoid collisions and ensure the safety of all users. I would favour a straight run-in to the underpass, particularly for cyclists, and thereafter a safe and separate space for cycle-users.

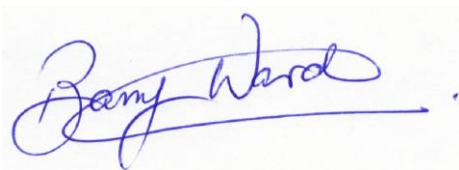
Proposed Overpass at Merrion Church (Merrion Bypass)

52. While I would prefer to have taken the vehicular traffic underground, to by-pass Merrion Gates, I understand the economic and engineering difficulties that such a proposal presents.

53. On that basis, I accept the design of the overpass as a necessary, if unfortunate, option. However, I would like to see some effort to minimise its effects on the surrounding landscape and environment, and I would welcome tree-planting and planting to disguise the structure.
54. Would it be possible to consider high sides to the overpass to minimise the effects of traffic on the surrounding residential area, both in terms of houses being overlooked and the effect of vehicle noise?

Summary

55. This scheme bears little resemblance to the S2S as originally envisaged. An innovative, far-sighted and enfranchising plan has been replaced with a narrow-minded, nay-saying and unimaginative bureaucratic “compromise”. I do not accept that, with ingenuity and willingness, the real S2S could not have been substantially advanced as part of this scheme, and this is hugely disappointing.
56. Having said that, on the whole, this scheme, particularly the improvements for cyclists at Deepwell and the closure of Merrion Gates, is to be welcomed as a positive step forward for cyclists and, in part pedestrians, an improvement in road safety facilities, and a move towards better traffic flows as the Dublin south-east traffic corridor.
57. It is short-sighted that necessary future works on the DART sea-wall are not seen as an opportunity to construct flood defences and a real S2S as part of a single project. This will be a missed opportunity and I feel very strongly that there has not been sufficient exploration of this aspect of the scheme.
58. The opening of a footpath, even though it does not provide access for cyclists, is a very positive development.
59. The proposed change to traffic flows on Seapoint Avenue has not been properly thought through, does not appear to be workable, will have a very detrimental effect on Monkstown Village and Dún Laoghaire Town, and is potentially dangerous.
60. Many of the difficulties that this scheme generates could be solved by locating a continuous and discreet cycle route along the coast and on the sea-side of the DART line.



Councillor Barry Ward

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