



c/o 7 Mount Merrion Avenue
Blackrock
Co Dublin
Ireland

Senior Executive Officer,
Planning and Enterprise Department,
Dún Laoghaire-Rathdown County Council,
County Hall,
Marine Road,
Dun Laoghaire.

Date 27th May 2013

Re: Blackrock Local Area Plan

Dear Sir,

I wish to object to what can only be interpreted as the abandonment of the Sandycove to Sutton Promenade and Walkway by Dun Laoghaire Rathdown County Council. It is simply incredible that a vision which has such public support and in which so much time, effort and public money has been invested by the Department of Transport and Tourism, Dublin City Council, Fingal County Council, the Dublin Docklands Development Authority and the Dublin Transport Authority, the Dublin Regional Authority and (in former times) by Dun Laoghaire Rathdown County Council, can be destroyed by the actions of one local authority.

The S2S project seeks to create a 22 km seafront walkway and cycleway from Sutton to Sandycove. Dublin City Council recently announced their intention to commence work on the missing 2 km seafront section at Dollymount. They have also announced the commencement of the detailed design of the section from Alfie Byrne Road in Fairview to Sean Moor Park in Sandymount. This leaves only 4 kms of available seafront in Dublin Bay where there is no walkway or cycleway. Most of this missing section of is in Dun Laoghaire Rathdown County area. It is ironic that at a moment when Dublin City Council has shown the courage and determination to complete the missing seafront section of the project, Dun Laoghaire Rathdown County Council should decide to abandon it, notwithstanding the commitment in its own County Development Plan. The new proposal in the Blackrock Local Area Development Plan for a “*localised re-routing*” of the seafront walkway and cycleway to Blackrock Park and inevitably thereafter on the Merrion Road, is not an acceptable alternative “solution”. It is obvious that the localised rerouting will extend from Sandymount to Salthill, if not Dun Laoghaire. It is an abandonment of the vision. In support of this objection, I wish to make the following points:

1.0 Blackrock LAP Proposal:

1.1 The proposed Blackrock Local Area Plan refers to the 2010-2016 County Development Plan and then comments as follows:

9.4.2 Sutton to Sandycove Pedestrian / Cycle Route (S2S)

The current County Development Plan (2010-2016) identifies a Specific Local Objective SLO93,

'To promote the development of the Sutton to Sandycove (S2S) Promenade and Cycleway.'

The Sutton-to-Sandycove initiative involves the development of a continuous 22 kilometre cycleway and promenade around the coastal edge of Dublin Bay and linking into existing and proposed cycle and walking routes. The indicative route shown on Map 2 'Extract from the County Development Plan' runs along the seafront at Blackrock.

The biodiversity and habitat of Dublin Bay is of national and international importance and large sections are designated as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Proposed Natural Heritage Area (pNHA). The S2S route originally proposed traverses sections of these designated areas. Having regard to the likely negative impact on these local habitats, serious consideration needs to be given to the localised re-routing of the Sutton-to-Sandycove pedestrian /cycle route within the bounds of the Blackrock Plan area.

SF2 It is an objective of the Council to undertake a localised re-routing study for the proposed Sutton to Sandycove Pedestrian / Cycle route within the bounds of the Draft Blackrock LAP

1.2 The **"likely negative impact on the local habitats"** is given as the reason for abandoning the seafront location and the re-routing it into Blackrock Park (and then onto the Merrion Road). Note that it is the **"likely"** impact on which the decision is made. While it is acknowledged that the National Parks and Wildlife Service (NPWS) have expressed concern about the proposal, the process by which developments are determined to have an unacceptable impact on habitats or not, as the case may be, is clearly set out in the Habitats Directives. It requires a study called an Appropriate Assessment to be undertaken by the relevant Local Authority before a decision can be made as to whether a proposal is such that it cannot proceed. No such Appropriate Assessment has been made by DLRCC and furthermore the Council management have made it clear that they have no intention of undertaking one. Thus DLRCC has not only denied the community the right to have the matter formally assessed in accordance with the legislation, the Council has prejudged the outcome of such a study, significantly damaging the possibility of the matter receiving an impartial hearing.

1.3 The pretext for this decision is that the National Parks and Wildlife Service (NPWS) have expressed concern about the impact of a new walkway and cycleway along

the part of the seafront that is designated as a habitat. It is also noted that NPWS made the same negative comments in relation to the proposed Walkway and Cycleway at the Bull Island Estuary but these concerns were rejected by An Bord Pleanála in allowing that project to proceed as designed. It is accepted that DCC have through financial necessity been required to scale down the project but that does not detract from the importance of the decision by An Bord Pleanála.

Instead of abandoning the whole vision, what is needed is for DLRCC to work with NPWS and appropriate engineering and environmental experts to find solutions that will eliminate the problems or reduce them to a level that is acceptable. Such a study could also take account of how Dublin Bay is to be managed as required by the Habitats Directives. There is every likelihood that such a study could also come up with imaginative solutions that would enable the vision of the seafront walkway and cycleway to be achieved and at the same time allow the full objectives of the designation of the habitat to be secured by the implementation of a comprehensive management plan for the South Bay. The choice is clear. We either work together to find solutions to the issues that allows Dublin Bay to continue to be an amenity for the citizens and a habitat for birds (as it has been for centuries), or allow it to become a wilderness, inhabited only by birds.

2.0 Proposed new Access at Idrone Terrace.

2.1 Access to the Seafront.

Section 9.4 of the draft LAP deals with the need for improved access to the seafront and makes a proposal to provide for that. The following is the relevant part of Section 9.4:

9.4 The Seafront

The coastline at Blackrock is an important asset which is currently under utilised. The railway line forms a physical barrier while the development in the core of Blackrock has over time generally ‘turned its back’ on the sea. A key objective of the Draft Blackrock LAP is to reconnect the Village to the seafront and, in turn, promote the use of the coastline for an extended palette of passive and active amenity and recreational uses.

9.4.1 Access and Recreational Amenity

The Blackrock Baths were provided for by the railway company in 1839. In 1887 the Baths were rebuilt, but were eventually closed in the late 1980s. By 1992, due to lack of maintenance, parts of the Baths were dismantled and in 2012 much of the remaining structures were demolished under the Dangerous Buildings Legislation.

The seafront and bathing area at Blackrock represents an intrinsic part of Blackrock’s heritage and notwithstanding the recent demolition, the area still has considerable potential as a recreational and tourism asset. The seafront itself is a natural yet underutilised asset and resource which currently has restricted access and a poor public realm. The County Development Plan includes various policies and objectives aimed at realising it’s potential. Policy LHB19: ‘Beaches’ states

‘It is Council policy to promote the use of beaches for amenity and recreational use. The areas traditionally used for bathing in the County include.....Blackrock Bathing Place’, while Specific Local Objective 9 seeks ‘To encourage the redevelopment of the area encompassing Blackrock Baths, Bath Place and Blackrock DART Station’. To maximise the the overall potential of this natural asset, the bathing place, the associated public realm and pedestrian access to it, all need to be upgraded and enhanced where feasible. Section 3.6, ‘Public Realm Strategy’ of the Draft Plan includes detailed proposals to improve the pedestrian connectivity to the seafront and to further scope for improved bathing and amenity facilities at this location.

2.2 It is difficult not to be struck by the contrast between the fine words, acknowledging the significant amenity value of the seafront- with the decision to abandon the S2S project as a seafront amenity and to replace it with a small podium built over the Dart line. It completely misses the potential amenity value of a seafront walkway and traffic free cycleway and does not even remotely respond to the stated objective. It is pure tokenism.

2.3 The original S2S intention was to have a modest bridge and ramp at the end of Idrone Terrace leading down to the seafront walkway and cycleway. The Council now propose a podium over the Dart line with a set of steps down outside the Dart Line. As shown, there is no access proposed for bicycles or wheelchairs. Furthermore it appears that the proposed structure will prevent the S2S being constructed at some future date if and when the other issues are resolved.

2.4 The retention of what remains of the Baths as some sort of public amenity is to be welcomed although it is not clear how it is to be used. It is noted however that in undertaking modifications to the Baths, earlier this year, the Council constructed a new rear wall in a location that would also prevent the completion of the S2S project at some future date. This is further evidence of the fact that DLRCC have decided to abandon the project.

3.0 Conclusion

There is no objection to improving pedestrian and cycling facilities in Blackrock Park and the environs of the Dart Station or indeed to the construction of a podium and improving access to the seafront. All of these proposals can be achieved without reference to the S2S project. What is clear from the manner in which the proposition is put in section 9.4, DLRCC it can be seen as not so much an attempt to create new facilities, as to abandon the S2S project. Adoption of the LAP as drafted will prevent others who still believe in the vision and would wish to continue to seek solutions to the issues from doing so, destroying the hopes and aspirations other Government agencies and Local Authorities with a direct interest in the S2S project as well as the thousands of citizens who wish to see the S2S project proceed.

4.0 Proposed Amendments

We request that the following amendments be made to the relevant sections of the LAP:

4.1 The plan should be amended to remove references to the re-routing of the S2S project, leaving unaffected the objective set out in the 2010-2016 Development Plan “to promote” the S2S project. This will not affect any plans to improve facilities inside the Dart line.

4.2 That the Council will work positively with the NPWS and other relevant agencies to seek to find practical solutions to the difficulties of reconciling the provision of a seafront walkway and cycleway with the requirements of the Habitats Directives.

4.3. That the Council will modify the plans for an improved access over the Dart line and the old Baths to make provision for access for wheelchairs and cyclists as well as pedestrians so as to allow the possible future construction of the S2S project on the seafront.

Yours sincerely,

Michael M Collins
for
The S2S Project