

N11M11 Junction 4 to Junction 14 Improvement Scheme

Submission

from

Delgany Community Council (DCC)

This submission is in respect of the information that was in the public domain as of 12 November 2019. It does not relate to the Project Brief (Phase 1), Scheme Feasibility Report (Phase 1) and the Road Safety Impact Assessment Report (Phase 1) which were all uploaded onto the n11m11.ie website on 03 December (10 days before the public consultation submission deadline).

DCC is unaware if the general public have been made aware of this additional information by way of advertisement in national newspapers. DCC believe that since new information has been made available then the deadline for submissions should be formally extended.

In the absence of such an extension, DCC reserves the right to make a further submission once the above mentioned documents have been reviewed and considered.

Background Information about Delgany Community Council (DCC)

DCC has been in existence since November 2005 and has been an active participant in public consultations on Planning and Environmental issues for many years and in particular in relation to our Local Area Plan. Please see DCC's email dated 24 November 2019 to Mr Bradish and Ms Forde requesting more information and clarity on your proposals.

DCC has engaged widely with the community in relation to the scheme and there is huge apprehension locally among people who are concerned as to how this will affect their homes, health, livelihoods and way of life. Residents in the community are finding it difficult to grasp the extraordinary scale of the three Offline options, which include embankments/cuttings in excess of 40m high/deep with the associated side slopes extending beyond the edges of the 200m wide route corridor. We think some simple annotations on your drawings to show the height of embankments or the extent of cuttings would help. 3D images would also help.

THE PROBLEM, THE NEED AND POLICY CONTEXT

The Problem

- We agree that the M11/N11 is an important road between Dublin and Rosslare. We also note the following key points:
- During peak periods the traffic flow on the M11/N11 between Junction 4 and Junction 14 is dominated by single occupancy commuting traffic to and from Dublin.
- The volume of this commuting traffic exceeds the capacity only at specific sections of the road at peak periods of the day during the working week.
- This lack of capacity results in serious traffic congestion during the weekday morning peak period northbound and evening peak period southbound
- The sections of the road with inadequate capacity are between Junctions 5 and 7, as evidenced by TII's Needs Assessment Study & Report 2017. This can also be evidenced by

reference to Typical Traffic indicators on Google Maps, which clearly show how the bottleneck over this stretch leads to the AM and PM peak period congestion.

- The lack of roads that cross the Dargle River leads to a high amount of short distance local traffic using the N11 between Junctions 5 and 7 to cross the river to access different locations in Bray.

We agree that the congestion on the N11-M11 during weekday morning and evening peaks is serious and needs addressing. This peak period congestion has existed for well over 10 years. However, we do not agree with the scale, proposed routes or type of off-line motorway solutions that are being developed and considered.

As stated above the traffic volume leading to the congestion is primarily single occupancy motorists commuting to and from the greater Dublin area for work. This can be further amplified by parents and guardians dropping children to school and young adults to college, which contributes to a recognisable drop off in congestion during school holiday periods. Likewise it would be fair to assume if employment opportunities were to increase substantially along the coastal corridor of Wicklow and north Wexford there would again be a recognisable drop off in the peak time congestion. This congestion is compounded by the absence of meaningful public transport to take people to work/school/college from close to where they live to their place of work/study.

The Need

- The information that you have provided does not address or explain:
- The perceived need beyond TII's 2017 study, traffic analysis and capacity need.
- Potential Demand Management Options
- Public Transport Options
- The needs of pedestrians and cyclists
- The need for new local roads to cater for local movements
- How increased traffic generated by expanded road capacity will be accommodated north of Loughlinstown roundabout on the N11 into Dublin city or accommodate at north of Junction 16 of the M50.

Therefore, the extent of the impact on local residents has not been fully disclosed.

TEN-T Network

The N11 is on the TEN-T network but there are two tiers to this; Core TEN-T Network (limited to M1, M50 (between M1 and N7), N7M7 to Limerick and M8 to Cork), and the Comprehensive TEN-T Network (which includes the N11 as well as N4 to Sligo, N5 to Westport etc.). There is no need for even the Core network to be a motorway and certainly not the comprehensive network.

We see no justification whatsoever or evidence for the need of any of the Offline Corridors between points G and J shown coloured Pink, Orange and Cyan. Expansion of roadway capacity simply generates more traffic that cannot be accommodated further north.

Policy Context

- National, Regional and Local policies relating to transport are contained in, inter alia,
- The Climate Action Plan, (CAP)
- The National Planning Framework (NPF)
- The National Development Plan (NDP)
- The EMRA Regional Spatial and Economic Strategy, (RSES)
- Wicklow County Council County Development Plan (CDP) – (currently being updated to align with RSES)

- Wicklow County Council Local Area Plan (LAP) for Greystones-Delgany & Kilcoole
- The National Transport Authority's (NTA) Greater Dublin Area (GDA) Transport Strategy 2016-2035

The Government's recently published CAP aims to make growth less transport intensive and some key policies to achieve this include:

- The successful execution of the NPF and RSES designed to promote compact, connected and sustainable living
- Expansion of walking, cycling and public transport to promote modal shift
- Better use of market mechanisms to support modal shift
- The successful roll-out of the National Broadband Plan, which can promote remote working and wider activities which reduce unnecessary journeys
- The formation of dedicated Park & Ride team in the NTA

Within the NPF the key National Strategic Outcomes (NSO) relevant to the N11 corridor are NSO2, Securing Compact and Sustainable Growth and NSO4, Sustainable Mobility. In particular NSO2 states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. Achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority of the NPF. This is important to bear in mind when forecasting future year traffic, in particular from Wicklow-Rathnew where more locally based employment will be provided, leading to reduced demand to travel.

It is also important to note that the ten NSOs contained in the NPF are purposely aligned with the United Nations' Sustainable Development Goals in areas such as climate action, clean energy, sustainable cities and communities, reduced inequalities, innovation and infrastructure.

The NDP sets out implementation plan in support of the NPF and it is important to note that the NDP only identifies the section of the corridor from the M50 to Kilmacanogue to be upgraded.

The RSES describes how it provides a:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live and work.
- **Dublin Metropolitan Area Strategic Plan (MASP)** – to ensure continued competitiveness of Dublin and a supply of strategic development for sustainable growth.
- **Economic Strategy** – that builds on our strengths to create a strong economy and jobs, that ensures a good standard of living standard and economic opportunity for all.
- **Climate Action Strategy** – to accelerate action and ensure a clean and healthy environment, sustainable transport and green infrastructure.
- **Investment Framework** – to prioritise the delivery of infrastructure and enabling services by government and state agencies.

The message from the RSES is loud and clear; sustainable growth, sustainable transport and green infrastructure. The combined effect of the CAP and the RSES is that in the future An Bord Pleanála will not grant approval to road schemes that increase capacity where it serves unsustainable growth and development.

The current congestion problems on the N11 largely arise out of historic unsustainable long distance commuting from road dependent residential expansion on south Wicklow and north Wexford. It is important to note the Wicklow County Council's CDP is currently being redrafted and will have to align (as it does not currently align) with the NPF and RSES in respect of future land zoning and

sustainability. Therefore future land use/zoning projections, and hence the demand to travel/commute, will need to be amended and new policies / objectives will need to be included in the redrafted CDP to demonstrate this necessary change in approach.

Once the revised CDP has been adopted, the land use/zoning and transportation elements of the LAP will in turn need to be redrafted to also align with the NPF, RSES and revised CDP. However, we note that there are several important environmental objectives in the LAP, and indeed in the CDP, what are relevant to this study. These are described in more detail later in this submission.

The National Transport Authority (NTA) Greater Dublin Area (GDA) Strategy recognises that national transport policy seeks a reduction in the growth in car travel and an increase in the use of public transport, cycling and walking. It also sets out a number of guiding principles for road development, which are to be reflected in the development of individual road projects within the GDA, which includes the M11-N11 scheme. Key relevant principles are:

- Each proposed road scheme is to be consistent with the NTA's Strategy and with Government policies relating to transport.
- That the travel demand or the development needs giving rise to the road proposal are in accordance with regional and national policies related to land use and development planning.
- That the development of the road scheme does not diminish in any significant way the expected beneficial outcomes of the NTA's Strategy.
- That the road scheme, other than a motorway or an express road proposal, will be designed to provide safe and appropriate arrangements to facilitate walking, cycling and public transport provision.
- That alternative solutions, such as public transport provision, traffic management or demand management measures, cannot effectively and satisfactorily address the particular circumstances prompting the road proposal or are not applicable or appropriate.

OBJECTIONS AND ISSUES ASSOCIATED WITH OPTIONS PUT FORWARD BY THE STUDY

Offline Options

Despite the study purporting to consider a range of non-road-based options, it proposes dramatic new off-line dual carriageway / motorway roads that have been designed using 3D design software. This is alarming as it suggests the study is paying no real heed to the non-road-capacity increase-based options and has jumped to the conclusion that new roads are required all the way to Junction 14. Such options would be contrary to principles of the GDA Strategy and Government Policy in the CAP, NPF and RSES.

The information provided to the public does not offer an evidence based explanation or justification for this.

Traffic

While the need for a third lane as far south as Junction 8 was demonstrated by TII's Needs Assessment Study (2017) in order to remove the Junction 5 to Junction 7 bottleneck and cater for existing demand, the current study seems to be suggesting that a third lane in both directions needs to be provided as far south as Junction 12 to cater for more peak hour commuter traffic. No evidence based explanation, rationale or justification for this has been provided. The 2017 Study identifies that the increase of two lanes is not required for current demand, presumably only for

future increase in demand from commuters living in future residential developments being forced to travel in cars which is contrary to the CAP, NPF and RSES.

If a third lane were provided from Junction 12 northbound, this would increase the peak hour capacity of this section of the N11 from 3,550 vehicles per hour to circa 5,450 vehicles per hour. This increase in flow of up to 1,900 vehicles per hour would also have to be accommodated further up the corridor.

Additionally, it should be noted that in the northbound direction in the morning peak, there is a large increase in traffic that joins at Junctions 6, 7 and 8 (circa 1,800 vehicles per hour). This level of merging traffic would need another additional lane meaning that the section from J8 to J6 would then have to be widened to 4 lanes to avoid a repeat of the situation that is occurring already!

Furthermore, the links further north would also have to accommodate extra volume of traffic, for example, on the N11 north of Loughlinstown roundabout into Dublin city and on the M50 beyond Sandyford. The GDA strategy does not provide for increased capacity beyond Sandyford so that such a proposal would simply create a new bottleneck by just moving the existing bottleneck further along.

There is no point adding extra south bound capacity beyond the needs study as the southbound pm flow will never be able to reach anywhere near that capacity figure as it is throttled upstream by other capacity restrictions; on the southbound M50, Sandyford acts as a throttle, as does N11 and the Loughlinstown roundabout, limiting the flow than can enter the M11 from the M50 and the city. (It should be noted that Loughlinstown roundabout is to be signalised for bus priority reasons as part of the Bus Connects initiative; at no time in the future will there be any capacity upgrade of the roundabout and it will remain a constraint to the amount of southbound N11 traffic that joins the M11.)

There is thus no need for, or point in, a third lane south of Kilmacanogue and to provide one simply seeks to cater for more unsustainable car-based development contrary to the objectives contained in the CAP, the NPF and the RSES. The cost of providing this additional unneeded lane of roadway would have to be justified under the Public Spending Code.

The congestion on the M11-N11 is limited to the weekday peak period. The primary cause of this peak period congestion is the capacity issues between Kilmacanogue and Fassaroe. If the capacity shortfall of this section is resolved then the congestion problem will have been addressed. There is a misconception that the two northbound lanes south of Kilmacanogue and through the Glen of the Downs causes the congestion. They do not.

The extraordinary Offline Corridors coloured Pink, Orange and Cyan have been developed to bypass the Glen of the Downs SAC. But there is absolutely no need for this. There has been no evidence produced to support this proposal either.

We see no evidence based justification whatsoever for any of the Offline Corridors between points G and J shown coloured Pink, Orange and Cyan. Many studies have shown that expansion of roadway capacity simply encourages more car use, particularly at peak times. The information provided to the public does not address how increased peak time traffic generated by expanded road capacity will be managed north of Loughlinstown roundabout and into Dublin city or managed on the M50 north of Junction 16.

Economic Appraisal

No evidence has been provided to the public that any of the Off-line Corridor options between points G and J shown coloured Pink, Orange and Cyan have been appraised against the stated Project Objectives or that the financial costs to the taxpayer adhering to the Public Spending Code or the environmental costs have been appraised. We contend that the costs of these options will far outweigh any assumed benefit that might be delivered on foot of those costs and cannot represent value for money.

Such costs are not required to fix what is essentially a weekday morning and evening peak time issue.

An analysis of the costs of any of the off-line options with the assumed benefits hoped for should take account of several studies which show that expansion of roadway capacity simply generates more traffic. We reference, the paper by Todd Litman (Victoria Transport Policy Institute) published in the ITE Journal which states that expansion of roadway capacity simply moves the “pressure points” to another location; in this case north of Loughlinstown and at M50 junction 16.

The financial cost to the taxpayer of any of the off-line options/corridors east and west of the existing N11 is not justifiable. Given Ireland’s commitment to sustainability and The Climate Action Plan we suggest such public funds would be better spent on a step change in public transport options and providing sustainable transport solutions in a timely manner.

The underlying cause of the congestion must be addressed, i.e. continued unsustainable car-dependent residential development and lack of public transport options or incentives for private operators to provide mass transport options.

Environmental Impact

The scale of the offline options is scarcely comprehensible: embankments and cuttings in excess of 40m high/deep, with associated side slopes extending beyond the outside of the 200m corridors themselves. Such colossal earthworks will totally decimate the setting of Delgany village and eradicate the beautiful valley of the Three Trout Stream, as well as Drummin Hill.

The proposed offline routes would slice a swathe through the top of Drummin Hill overlooking Delgany and Greystones. This would generate extreme noise pollution and such an impact is in direct contradiction to objectives outlined in the Delgany-Greystones & Kilcoole Local Area Plan (2013-2019) which discusses the need to reduce traffic and associated noise levels. The proposals would also be hugely visually intrusive, as well as destroying this much loved and well recognised local landmark of its iconic line of Scots Pines at the top of the hill known as the Soldier Trees. As well as the noise, air pollutants such as diesel particulates would drift down from the new main road to the homes and schools below.

The offline corridors pose a serious threat to the stability and integrity of the ecological habitats of the area, in particular the Glen of the Downs SAC, the Three Trout Stream and the woodlands of Bellevue Demesne. The Preliminary Biodiversity Appraisal of the Three Trout Stream 2019 identified a number of BoCCI (Birds of Conservation Concern in Ireland) red listed bird species. There are also a large number of birds identified as medium conservation concern.

The pink and orange offline options are contrary to a number of objectives of the Greystones-Delgany & Kilcoole LAP:

- Glen Road is zoned as a Green Belt (GB) area, the objective of which, as stated in the LAP, is:

- *“To generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes”*
- The areas immediately adjacent to the Three Trout Stream, both northern and southern banks, have been designated as Open Space zones, the purpose of which is:
- *“To preserve, provide for and improve public and private open space for recreational amenity and passive open space.”*
- The area to the immediate south of Glen Road, has been designated as a R2.5 zone, which allows for the development of low-density residential housing as follows:
- *“To provide for the development of sustainable residential communities up to a maximum density of 2.5 units per hectare and to preserve and protect residential amenity.”*
- Delgany Village is an ACA (Architectural Conservation Area), this special character could not be preserved with the offline options.
- The LAP contains objectives for the preservation and protection of the view southwards at the Horse & Hound towards Drummin Hill.
- Under Tree protection objectives, protected trees include Glen Road / Stylebawn, line of Scots Pine on the hill east of Drummin.

Areas to the east of the Glen of the Downs are designated as medium or Medium to High with respect to Landscape Sensitivity. These areas coincide with the large forested areas which extend eastward from the SAC areas of the Glen of the Downs. These highly sensitive landscape areas constitute the contiguous areas of dense broad-leaf native woodland that constitutes the wider/peripheral Glen of the Downs woodland areas and natural habitats. Both the Pink and Orange proposed route options would devastate these sensitive landscape areas.

With either of the pink or orange options the Glen of the Downs would be placed between two large carriageways, resulting in the severance of ecological exchange around boundaries of SAC. The existence of two separate carriageways (one through and a proposed additional one to the east of the SAC) would have the effect of creating an ecological island within the SAC. This would essentially disrupt the free movement of species, nutrients and pollinators between the SAC and the surrounding woodlands and hills. Such a scenario may rapidly and irreversibly compromise the ecological stability of the Glen of the Downs and the wider area.

Within the Bellevue Woodlands, there are NPWS-designated areas of Ancient and Long-Established woodland, representing some of the rarest native Irish woodlands and unique habitats in the country. This area is largely used for recreational and exercise purposes, with a WCC listed landscape viewpoint (“The Octagon”) and abundant walking routes.

A significant negative effect on such habitats is almost inevitable given the scale of the proposed development.

Furthermore at the southern end of the pink and orange options the proposed routes run through the area of land containing a known old illegal, and potentially contaminated, landfill which was purposely avoided and left in-situ in the redesign of Junction 11 prior to its construction to serve the Farrankelly dual carriageway.

Climate Action Plan

- We support the Government’s Climate Action Plan which seeks to make growth less transport intensive and dependent. The Climate Action Plan aims to have fewer cars on the road by 2030.

- The proposed Offline Corridor new road solutions run contrary to the aims of the Climate Action Plan by facilitating a continuation of increasing traffic volumes.
- The carbon cost of sourcing the material required to build any of the Off-line Corridor options and the carbon cost of actual construction cannot be justified.
- The carbon cost of demolishing existing homes is not justified.
- The carbon cost of “generated traffic” caused by expansion of roadway capacity cannot be justified.

Summary of Objections and Issues

We are at a loss as to how these options can be considered “feasible” options; that they are even being considered is astonishing and has alarmed and shocked the community. The number of homes that would be wiped out by these options, along with the colossal adverse environmental impact and cost of the options, is truly appalling and contrary to the stated objectives of preserving local communities and minimising impact on the environment. They will also not contribute to addressing the journey time objectives in any significant way, instead simply encouraging more unsustainable car based commuting contrary to the Climate Action Plan and National Planning Framework.

DCC’S PROPOSED SOLUTION

We agree that the efficiency of the existing M11-N11 Corridor requires improvement. This can best be achieved along the existing road corridor (the Red Option) with the following measures:

Environment

- We favour keeping and improving the existing corridor, while respecting and protecting the SAC designation of the Glen of the Downs. We do not have to choose between either the environment and biodiversity or a better quality of life. We can have both.

Pedestrians and cyclists

- Install excellent, attractive and safe cycleways and walking routes. Currently cyclists compete with vehicular traffic for road space. It would be relatively easy to install a cycling and walking route in the forest through the Glen of the Downs. (Note that old sessile oak woodland is the sole conservation objective and these are primarily found in the middle and upper slopes; this should not prohibit the creation of off-line greenway pedestrian/cycle route through the forest in the Glen of the Downs.)
- Such routes should be continuous along the entire 22km under consideration . If it was designed for cycling and walking only and sufficiently distant from vehicular traffic it would be an attractive tourism resource and would comply with the Project Objective marked “Physical Activity”. This route could then be further extended possibly to connect to Greystones.

Public Transport

- All Government policy and strategy, as well as public sentiment, such as that expressed by the Citizens Assembly, wants the expansion of public transport spending over new road infrastructure. Our solution includes a step change public transport above and beyond the public transport proposal identified by the NTA to serve the GDA. Such a step change in public transport would not cost as much as any of the Offline Corridors coloured Pink, Orange and Cyan.

- Public transport options must include local area, local district mini buses for journeys not exceeding 3 kilometres.
- New bus services need to be provided in a manner that will be attractive alternatives to the car. In this regard it is important that accurate and up to date origin- destination survey data of the existing traffic on the corridor is obtained and analysed. Such bus services should start from park and ride locations close to major population centres, such as Wicklow town, and pass other locations/nodes at frequent intervals, such as Kilpedder or Willow Grove near Junction 11 Greystones and be routed to major employment destinations such as Carrickmines/Kilternan; Cherrywood; Sandyford and Dublin City Centre. For example, currently the Wicklow bus (133) passes through this area going towards Dublin city centre. However, by the time it reaches the two stops in Kilpedder it is often already full to capacity and therefore declines to pick up any passengers. Anyone waiting at the Kilpedder bus stops in the mornings at peak commuting times can expect this to happen at least once per week. That person is then left waiting half an hour at the side of the road for the next bus, with no shelter from the rain. When people are commuting to work, they need a more reliable service than this. They also need a bus shelter to stand in. Parking must be available nearby if motorists are to be tempted out of their cars.
- We also need smaller and more versatile public transport, (small mini-buses), to connect the several different settlements in the county with each other and to connect those settlements to more major public transport nodes on the N11/M11
- Bus users and all public transport must have priority over cars carrying one or two persons. The buses passing through the Glen of the Downs currently get caught up in traffic comprising mostly single occupancy vehicles. We support the creation of extra dedicated bus lane on the N11 for this purpose, going northbound in the mornings. This new lane needs to run from Kilpedder to locations such as the Loughlinstown roundabout (which is to be signalised with bus priority measures as part of BusConnects) , where it can join up with the existing N11 Stillorgan dual carriageway bus lanes, as well as Cherrywood, Kilternan/Carrickmines and Sandyford.
- In order to encourage carpooling, high occupancy private vehicles could also be allowed to use the new bus lane.
- Ensure that the planned increase in the Greystones Dart Park & Ride is implemented along with increased DART frequency and reliability. Too often the existing Park&Rides are full and commuters feel they cannot be relied on so there is no point wasting time going there to look for a space. There is plenty of unused and under utilised council land adjacent to it.
- The fact that there is only a single track between Greystones and Bray is a serious issue that requires a solution, now that the population south of Bray continues to increase rapidly. The frequency of Darts and mainline rail services could be increased by allowing northbound trains waiting to use the single track to use a new waiting area closer to Bray head (as opposed to waiting in Greystones station). These proposals have been made by a local councillor for many years, but these have not been adopted by Iarnród Éireann.
- In the longer term, many locals believe the time has come for national funding to be made available to bore a new wider tunnel through Bray Head. Bearing in mind that the existing tunnels were built in the 19th century by men using picks and shovels, it is high time a wider and more modern tunnel was engineered.
- Large residential estates should have their own free mini-bus to take residents to the train/Dart, Luas, Bus Park and Ride sites / pick up points or Bus-Connect network. Once this step change in public transport is provided, these can be combined with demand management measures, including tolling if necessary as set out in the GDA strategy.

Road Capacity

- Northbound AM peak period traffic congestion in the Glen of the Downs is caused by the lack of capacity between Junctions 7/8 and junction 5, in particular as a result of a large volume of merging traffic at Junction 7, compounded by a ripple effect at Kilmacanogue from the speed limit and access arrangement. We agree with the proposals put forward by Kilmacanogue residents which involve removing the existing access point onto the N11 and putting in a new service road linking to a redesigned Kilcronej junction 7. This very sensible proposal is detailed on their website www.thisroadisadisaster.com
- Southbound PM peak period traffic congestion on the M50 approaching the M11 merge emanates from the same lack of capacity between junctions 5 and 7/8, compounded by the tight diverges to Herbert Road, Junction 7, the steep uphill gradient after the Dargle river crossing and the speed limit / access issues at Kilmacanogue. We would support proposals to limit peak time access to/from small slip roads during peak periods.
- Bus lanes should be provided. Where space is constrained it would be possible for bus lanes to be provided on the hard shoulders at peak times. Alternatively it could be possible to provide a removable tidal-flow solution in order to provide the bus lane again at peak time, ie northbound in the morning and southbound in the evening.

Safety

- Address any safety issues relating to sub-standard junctions and private accesses by provision of local parallel service roads. These should also provide alternative routes for local, short-hop traffic using the N11 for local trips because of the shortfall in local roads.

Demand Management

- When the public transport options are radically improved demand management measures should be introduced to further support modal shifts:
- Tolling on the N11 at peak times (as per GDA strategy)
- Increased car parking costs
- A congestion charge in Dublin
- Measures to tax parking spaces at places of employment

PC2 COMMENT SHEET

The Comment Sheet which the public have been asked to submit is misleading because it purports to offer for selection very simplistic choices. The aspects listed are interconnected. Nevertheless, we comment on each as follows:

Improving traffic conditions and capacity

We want improved traffic conditions but as stated above we have no reason to believe that increasing capacity by building one of the Off-line Corridor options will improve conditions for long. It will simply generate additional traffic and incur indefensible financial and environmental costs. We have set out above our alternative solutions for improving traffic conditions

Impact on Communities

The Off-line Corridor options will have a very deleterious impact on several different Communities. See for example separate submissions from the communities in Delgany, Bellevue, Drummin, Valley View, Kilmurray, Ballydonagh, Glen of the Downs, Coolnaskeagh, Foxborough, Blackberry Lane and more.

The Off-line Corridor options will separate and fragment existing settled communities. They will require actual demolition of a large number of family homes, some of them built only in very recent years. They will alter irretrievably the way these communities and settlements function and connect with each other. They will destroy the setting of Delgany village and decimate the Three Trout Stream Valley.

The market value of people's homes that "fortunately" escape the bulldozers but will now lie in close proximity or in the shadow of the Off Line Options will plummet and possibly be unsellable. Even now the effects of the N11-M11 proposals are being felt by people who have expressed genuine concern that they will not be able to sell their homes until the preferred option is chosen.

Effect on Built and Natural Heritage

Delgany is an Architectural Conservation Area ("ACA") located in a landscape that has a distinctive character and features of natural beauty and interest. Two of the Off-line Corridor options are going to seriously damage that character and natural beauty.

Effect on Biodiversity

The Off-line Corridor Options will infringe in a deliberate way Article 10 of the Habitats Directive; it will destroy traditional field boundaries. These are important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.

Impact on Air Quality, Climate, and Noise

There is plenty of scientific evidence of the impact that road traffic has on air quality and noise. The Off-line Corridor Options will have a very detrimental impact on Delgany village Centre, its several businesses and many family homes. It is simply not acceptable to impose such harm and damage when it is not necessary and when any wider public good can be achieved without such destruction.

Outside the village centre many of the homes and farms adjacent to the proposed Off line Options have their own natural spring wells for drinking water. Given the enormous scale of the offline proposals it is highly likely that the underlying water table / aquifer will be interrupted and these water supplies destroyed. In addition there is a real possibility of contamination of the ground water from the discharge of motorway runoff water.

Safety Improvements

It is not necessary to build new off-line motorways involving the scale, financial cost and environmental cost proposed by the Off-line Corridor Options in order to improve safety on the N11M11.

Impact on Land

The Off-line Corridor Options will irretrievably damage an extensive area of land and landscape as defined in the European Landscape Convention. There is a complex network of underground naturally occurring streams and springs in Delgany, particularly on Blackberry Lane and Bellevue Hill. These generate great volumes of surface water from time to time depending on weather conditions.

It is unclear as to how contaminated motorway surface water will be handed both in the deep cuts and the proposed banks/fly-overs, however as stated above there are numerous farms and homes who's only source of drinking water is from natural wells which would be severely compromised.

Improving Road- Based Public Transport

We are 100% in favour of improving road-based public transport but it is not necessary to build any new roads and certainly not new motorways involving the scale, financial cost and environmental cost proposed by your Off-line Corridor Options in order to improve public transport. Road-based public transport is improved by spending the roads budget on actual public transport initiatives, for example the provision of clean, smart, comfortable buses of different sizes with priority at all times on public roads, as per the Bus Connects initiative in the GDA. Provision of park and ride options and regular surveys to verify the continued validity of routes/bus sizes is required.

Visual and Landscape Impact

The proposed off-line roads have absolutely no visual merit. They will obliterate Drummin Hill, one of the most iconic landscape features of the area. The extraordinary scale of the three offline options, which include embankments/cuttings in excess of 40m high/deep with the associated side slopes extending beyond the edges of the 200m wide route corridor, will have an irreversible and catastrophic impact on the landscape.

In addition the proposals all call for extensive obliteration of landscapes at the junctions which for safety reasons will have very bright lights and very tall light poles. We would expect the remainder of the off line options to also have motorway lighting which will have an obvious impact on the wildlife and will negatively visually impact on the skyline as the options tear through Drummin Hill.

Access to the N11/M11

It is not necessary to build any of the Off-line Corridor Options in order to improve access to the N11/M11. The congestion on the N11/M11 is caused by the capacity constraint between J5 and J7/8in both directions with too many substandard accesses. See our comments above.

SUMMARY OF DCC SUGGESTED SOLUTION

We believe that DCC's solution as outlined above will address the scheme objectives as set out at PC 2. It is clear from Board 4 of the PC2 display that increasing the capacity of the corridor for commuter traffic performs poorly in terms of achieving the stated objectives.

CONCLUDING STATEMENT

The DCC recognise need to improve the existing situation. However, this has to be achieved in a sustainable, cost effective manner without destroying large swathes of the local environment.

The message from all relevant policies, such as NPF, CAP, RSES is loud and clear; sustainable growth, sustainable transport and green infrastructure.

The scale of the offline options put forward is completely unacceptable: embankments and cuttings in excess of 40m high/deep, with associated side slopes extending beyond the outside of the 200m corridors themselves. Such colossal earthworks will totally decimate the setting of Delgany village, have a huge adverse impact on communities and eradicate the beautiful valley of the Three Trout Stream as well as Drummin Hill. The financial and environmental costs of the offline proposals are contrary to Government Policy.

Simply providing more road capacity will only lead to increased car use and not break with the mistakes of the past which allowed development to sprawl in an unsustainable manner. The solution has to be centred on public transport and demand management.