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**Sent:** 10 January 2020 16:25  
**To:** 'Delgany Community Council'  
**Subject:** RE: County Development Plan Review - Delgany Community Council Submission

A Chara,

I wish to acknowledge, with thanks, receipt of your submission regarding the County Development Plan review.

Mise le meas,

[REDACTED]  
Planning, Development and Environment.

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**From:** Delgany Community Council [<mailto:delganycommunitycouncil@gmail.com>]  
**Sent:** 10 January 2020 14:08  
**To:** Planning - Plan Review  
**Subject:** County Development Plan Review - Delgany Community Council Submission

Dear Sirs,

Please find attached Delgany Community Council (DCC) submission to the County Development Plan Review.

I have also attached a copy of the DCC submission on the N11/M11 Junction 4 to 14 Improvement Scheme as it ties into various aspects of the CDP.

DCC welcomes the opportunity to contribute to the initial stage of the preparation of the CDP and looks forward to further engagement in the coming months.

Kind regards  
Zoe

**Zoe Woodward**  
*Chairperson*  
*Delgany Community Council*

[REDACTED]

 Please consider the environment before printing this email







**Submission from**  
**Delgany Community Council and Delgany Tidy Towns**  
**regarding Wicklow County Development Plan**

10 Jan 2020

Delgany Community Council (DCC) is an all volunteer group of residents and businesses who work together to promote business, tourism and community life in Delgany. The group works closely with Delgany Tidy Towns to develop projects, apply for funding and improve the locality.

The main aims and objectives of the community council are as follows:

- To create a vision for Delgany that will result in a vibrant, active and sustainable community.
- Encourage and work towards the maintenance and betterment of Delgany village and its environs
- Preserve and protect the sites of historical interest in the Delgany area and environs
- Act in a lobbying capacity so that the best interests of Delgany residents are heard.
- Improve the quality of life for residents and visitors to the village and surrounding area.
- Foster a sense of inclusion, belonging and participation amongst all the residents of Delgany. In the past year this has included a Christmas Carol Service, Spring Clean events and a community BBQ.

All residents of Delgany are welcome to join the DCC

We have a history of engagement with the planning process, most recently with regard to the proposed N11/M11 road improvement scheme. We recognise the importance of engaging in this process as The County Development Plan sets out an overall strategy for the proper planning and sustainable development of County Wicklow.

This submission has been prepared by a small subgroup of the council and was circulated to our entire committee for feedback in advance of submission. It is worth pointing out that the process is daunting to individuals who, while they may have very valid points to make, have little planning knowledge.

We have huge concerns relating to some of the potential routes outlined as possibilities in the N11/M11 consultation process:

**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.

DCC welcomes the opportunity to contribute to the initial stage of the preparation of the CDP and looks forward to further engagement in the coming months.

### Core Strategy

What is the best designation for your town?

What towns and villages should be promoted for population growth?

Do you think your town has the capacity to sustain more housing growth? If so, why?

Do you think that the level of housing development in your town has been matched by adequate infrastructure and services?

What are the service shortfalls in your area?

How should we deliver compact growth in each of the County's towns and villages?

What is required to make our towns more self-sustaining?

We have noted that the current County Development Plan 2012-2019 had designated Bray, Wicklow, Rathnew, Arklow, Greystones-Delgany, Newtownmountkennedy and Blessington as 'growth towns'. The most recent National Planning Framework and Regional Spatial and Economic Strategy has now identified just Bray and Wicklow/Rathnew as growth towns.

We want to ensure that any projected increase in population is focussed on those towns. In our view the revised population growth target of 164,000 for County Wicklow should be reduced further if it is decided that Bray should get its figures for population growth from the Dublin metropolitan area.

Bray is a large urban town with employment as well as reasonable transport links. Those transport links will be further enhanced if the Bus Connects plan is realised. Bray DART station has been identified as a bus hub.

We assume that this means a review of zoning in the towns that have not yet been granted planning permissions. Delgany has experienced rapid growth in the last 2 years without an accompanying provision of community facilities and transport links. Delgany has been treated as part of the greater Greystones/Delgany area even though these places have distinct separate identities. We have the view that Delgany and Greystones should be considered separately in the Plan as they are totally different in terms of infrastructure and heritage. Delgany has expanded to a far greater extent than Greystones without the required additional facilities and services. We believe that the Greystones/Delgany area exceeds its ability to cope and that it should be prioritised in terms of provision of better public transport, additional local employment as well as additional community





services. It is worth noting that the largest employer in the Greystones/Delgany area is probably the Department of Education through the 10 local schools.

In terms of the RSES settlement hierarchy the most appropriate designation for Delgany is as a self sustaining town which is defined in the strategy as follows:

“ii) Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.”

Significant additional investment is needed to provide adequate public transport as well as employment and recreational opportunities for those who live locally. Improvements are being delivered on an ad hoc basis and seem to be planned primarily to serve the interests of developers. As an example, a section of the Delgany to Blacklion road is currently under construction as a development is taking place in the vicinity. That road improvement was first mentioned in a county development plan 30 years ago. When that section is completed it leaves a larger piece still without a timeline for completion.

Bray and Wicklow should be targeted for further growth as they have employment opportunities and in the case of Bray, good transport links.

Delgany does not have any capacity for further growth as it has experienced significant expansion in recent years with no additional public transport, community facilities or employment opportunities. Any future large developments should have a special condition of a Contribution towards the upkeep of the Village of Delgany. This payment is collected by WCC and handed over to the local community in time.

In order to ensure towns are self-sustaining we require: Local employment, excellent transport links, community facilities (sporting, cultural, heritage, amenity) . local allotments, open spaces

Compact growth can be delivered in towns and villages by ensuring that any development takes place within the existing footprint in order to avoid semi urban sprawl which is both unsightly and difficult to service with public transport.

### **Climate Change, Flooding and Coastal Zone Management**

How do you think the County Development Plan can address climate change?

Are you aware of any areas that are liable to flooding that should be identified in the SFRA?

How should the Council manage pressure for development in flood risk areas?

Are the policies in the current development plan adequate to protect Wicklow’s coastline?

What type of developments should be allowed along the coastline outside of settlements?







**Are there any areas of coastline in need of protection in terms of conservation or physical defences?**

We welcome the recent adoption of a Climate Adaptation Strategy for County Wicklow as well as the establishment of a relevant Strategic Policy Committee.

We note the fact that the Council have appointed consultants to examine the feasibility of building The East Coast Wicklow to Greystones Greenway. The Irish Rail coastal erosion study which has been commissioned as part of the feasibility study is timely and can also be used as groundwork to improve rail service.

The County Development plan can address climate change by:

- Encouraging compact development which can be more easily served by public transport
- Prioritising the development of public transport. Local link services will be needed to connect residents to public transport hub.
- Provision of Park and Ride facilities and a bus corridor on the N11
- Refusing to engage with proposals that encourage further car dependency by widening roads and increasing capacity for car based transport
- Provision of Local Link electric bus services to provide greater access to public transport hubs
- Continuing and expanding retrofitting of housing that is not adequately insulated.
- Considering carefully the environmental impact of any large scale developments that are planned for our county.
- Development along coastlines should be tightly controlled and related to provision of amenities and for tourism.
- Community energy projects should be promoted and supported in our county. There are initiatives in Co Leitrim which are worth exploring: [Sustainable Energy Communities \(SEC\) Programme](#)
- Increased number of recharging stations for electric cars.
- Flood risk areas can be managed by ensuring that any development in close proximity addresses potential impact on the floodplain. In some cases flood plains can be developed to a limited extent as walking routes
- Providing allotments to encourage Wicklow residents to grow and consume locally produced food. Further information available at this link: <https://lisafingleton.com/project/the-local-food-project/>
- New developments should be subject to a climate change impact audit. Developers should be encouraged to incorporate wild open space and measures conducive to wildlife (e.g. bat and swift boxes) as a matter of course.

## **Housing**

**What types of houses are required to meet housing demand?**

**Are there certain groups in society that find it difficult to access housing?**

**Is there a need for a special type of housing in your area e.g. the elderly, those with special needs?  
Where and how should social housing be provided?**





Where can high density development be accommodated?

How can increased densities be achieved in Wicklow's towns and villages?

Is the rural housing policy working effectively to facilitate genuine rural housing needs while protecting the landscape from inappropriate urban generated development?

We welcome the emphasis on mixed housing developments that allow people to remain in an area and move to a larger/smaller property as their needs change. This natural mix of ages and stages creates livable communities and is an important contributing factor in placemaking.

Almost all groups will struggle to access decent affordable housing in our locality, whether to buy or to rent. Affordability is a huge concern in our area. Lack of affordability sees people moving towards Wexford and enduring lengthy and difficult daily commutes.

We recognise the need to increase density in order to maximise land use and create more compact sustainable communities. However this should take into account the neighbouring densities as well as height of buildings to ensure that the amenities enjoyed by existing properties are not damaged.

High density is best suited to areas which have good public transport or substantial local employment opportunities, in our opinion, high density and further expansion on a medium to large scale should be confined to Bray and Wicklow.

The Delgany area requires considerable additional infrastructural improvements and additional community facilities to catch up on the development that has taken place in the last 10 years and cannot accommodate further development at this point unless it is preceded by such facilities.

There should be no increase to current housing density allocations in Delgany.

#### **Special types of housing needed locally**

Those who need specific types of accommodation include the elderly, those with mental health difficulties, young adults leaving care at 18, and carers. Carers often struggle to access affordable housing and frequently find themselves in a precarious position. While they work fulltime as carers their work is unpaid and unrewarded and they cannot easily save for deposits.

We would like to see the development of supported living hubs (ref McAuley place in Naas, Co Kildare <https://mcauleyplace.ie/> ). This model is a welcome move away from the charitable provision of housing towards the creation of communities which allow vulnerable adults and artists to co-exist in a mutually beneficial environment. It also provides an arts and cultural hub for the local community. Certain types of properties lend themselves to such developments and we believe there is a great opportunity to create such a development when the Carmelite Convent site, in Delgany village, is developed.





### **Affordable Housing**

Examine creative ways to provide such housing. Companies and Approved Housing Bodies/Council could collaborate to fund and build affordable housing for rental or purchase by employees. This would allow companies to retain key staff and to build capacity.

### **Economic Development and Employment**

What are your views on economic development in County Wicklow?

What measures can be put in place to ensure Wicklow is viewed as a more attractive employment base?

How can the Plan promote and facilitate new economic opportunities?

Where should economic development be located?

Do you think brownfield sites should be promoted for new economic development?

Are there new ways of working that should be facilitated in the Plan e.g. co-working hubs, working from home, live-work units

How can the County's rural economy be diversified to sustain rural areas?

Are there adequate policies in place to protect the countryside from commercial / industrial / economic development?

What type of economic development is appropriate for rural areas?

Economic development in North Wicklow has been limited. The vast majority of residents in Greystones/Delgany commute to the Dublin area for work. This is unsustainable and does not lead to the creation of strong communities.

A recent report indicated that the I.D.A conducted only one visit to our county in the last year. We have a huge I.D.A. site in Greystones, it has been zoned for at least 20 years and has lain idle throughout that period. It needs to be developed to provide sustainable, local employment.

Delgany is not suitable for new economic/retail development. The village is almost totally residential. Any attempt to change this would be detrimental to the heritage of the village.

To improve Wicklow's suitability as an employment base the Council should apply recognized best practice:

### **Social and educational climate:**

- Council funded and supported affordable and social housing.
- Better community and leisure facilities.
- Better linkage with third level institutions.
- Government funded relevant retraining programmes for workers looking to transition.





#### **Development of the entrepreneurial ecosystem:**

- Develop Facilities with supports for start-up businesses, remote working hubs that are serviced.
- Expand Local Enterprise centre, fund and support start up facilities with admin support
- Provide and incentivise co-working and remote working.

#### **Employer Retention:**

Develop processes and subsidies to attract and retain local employers

#### **Technical Infrastructure:**

Continue the expansion and development of high speed internet connectivity

To maximize employment opportunities in Wicklow one needs to account for the current development in place along the N11 corridor. This spread out residential and light industrial development does not lend itself to the creation of a traditional high density employment zone such as a Central Business and Financial District. Instead Wicklow has the opportunity to develop what more modern cities such as Vancouver are doing which is to develop numerous "Alternative Business Districts" which are neatly integrated into or adjacent to residential centres. This approach works particularly well with information economy work and areas with high levels of education and internet connectivity.

This approach also would help mitigate the ongoing issues of congestion and dramatically improve societal decarbonization by reducing the need for long commutes.

With the current planning focusing on City Center Infilling it should not be necessary to do extensive new developments on brownfield sites since the goal of ABDs is tight integration into residential areas. Some ideal locations for Alternative Business Districts: Southern Cross between Bray and Greystones, Kilcoole, Wicklow Town, Ashford

If the locations are carefully chosen to fund development of ABDs these centers can also help to facilitate alternative employment opportunities for more rural communities while preventing increased commercial development within those communities

Ireland has a long history as an agricultural nation. There is no reason an information economy can not work side by side with an agricultural economy in rural areas. Agriculture is undergoing cataclysmic changes over the next generation and if Ireland wishes to retain its farming and horticultural enterprises over the long term it will require cultural, governmental and industrial changes and planning well beyond the scope of this document. With that in mind, the Food industry is also suitable as craft and tourism.

Proper development to stimulate economic growth in Wicklow in general and rural area in particular is dependant on adequate public transport development and provisioning and the ability to access a suitably skilled workforce.







### **Town and Village Centres and Retail**

What measures are required to make our towns and villages more vibrant and attractive as places to live in, work in, shop and visit?

How can the Plan improve retail vibrancy in Wicklow's towns and villages?

What can we do about vacant units in our towns and village centres?

What scale of retail development is appropriate for Wicklow's towns and villages?

Is there a shortage of retail in the County?

Have previous plans been successful in guiding retail development to the right locations?

How can retail spend be retained in the County?

-Areas of architectural heritage should be protected throughout the planning process, grants for restoration, public realm plans to ensure shop fronts are tasteful and in harmony in heritage towns.

-Vacant units: Incentivise new business to set up by reduced/free rates. Encourage "pop-up" shops, support prospective businesses to set up

The appropriate scale of retail development varies in each location depending on the size of town/village, population base and proximity to other towns.

Please examine the impact of paid/free parking on retail in our towns and villages. Provision of free parking at less busy times of the day may be an interesting solution.

### **Tourism and Recreation**

How should tourism be developed throughout County Wicklow without compromising our valuable resources including our scenic landscape and rich heritage?

Delgany- Develop a local Greenway (Delgany to the coast via Charlesland) which could connect to any future Greystones to Wicklow Greenway. DCC has been advocating for the development of a Three Trouts Stream Delgany to Greystones Greenway.

Our scenic landscape and heritage is the major attraction for tourism locally so it is obvious that any tourism development needs to happen in harmony with and without damage to the natural and built environment.

A traffic management/access plan is urgently needed for Glendalough

Is there a need for more tourist facilities within the County? If so, what is needed and where should they be located?





There is a huge need for tourist accommodation in North Wicklow. At present the greater Dublin region is the financial beneficiary of our tourist attractions due to a lack of hotel accommodation in the North of the county.

#### How can County Wicklow capitalise on the potential associated with Ireland's Ancient East?

Develop and promote The Wicklow Way walking route. A lot of work has been done at local level to develop and promote walks such as The Delgany Heritage Walk and The Fairy Walk. Further information is available at this link: [Walks in Delgany](#)

There are ongoing costs associated with the maintenance and signage of such walks and the financial support of the council through small grants, is very much appreciated.

#### Are there any outdoor tourism and recreation facilities that the County lacks?

The development of a series of Greenways or coastal walking and cycling paths would be a great amenity and would build habits in terms of use of bikes, exercise. We welcome the development of the Blessington Greenway and would welcome a similar development on the East Coast. Greenways also provide the possibility for better physical connections, for example Delgany could be connected to the coast via Charlesland.

Delgany was recently awarded a sum of €29,600, under the Town and Village renewal scheme, for the development of a Greenway Feasibility Plan and a Public Realm Urban Design Plan. Once the feasibility study has been concluded, further funding will be required in order to execute a plan for the village.

#### Are you aware of any public rights of way that should be identified in the county development plan?

In the last development plan (2013) the eastern part of the Delgany-Kilcoole Mass Path was included as a listed right of way ie that section of the path from Kilcoole to the tarred road at Kilquade. However this Mass Path actually continues on from Kilquade to Delgany, crossing the Farrankelly Road dual carriageway (where signage steps and stiles were erected for it by NRA at the time of the road's construction) and continues on to Delgany via Drummin Lane and Blackberry Lane. This omission should be corrected in the next development plan.

### Heritage

Under this heading we have included suggestions related to both the natural and the built heritage of our area.

#### What aspects of Wicklow's heritage do you consider should be protected?

All aspects of heritage (natural and built environment) which can be deemed to be of importance are worth retaining and protecting.

Delgany village has a very long history and it is hoped that the village centre can be improved and preserved in the short term. We have huge concerns at the devastating impact of some of the





options under consideration as part of the N11/M11 road improvement scheme. Vast areas of environmental importance would suffer a devastating impact, communities which have thrived for many years would be split and the nature of Delgany village and surroundings forever changed. The orange, pink and cyan routes would be especially damaging to our village. We are including this extract from our submission as part of the consultation process on the N11/M11 scheme :

#### "Environmental Impact of the proposed N11/M11 routes

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: 6
- "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."

-The town of Bray also deserves particular attention. Important buildings such as St. Paul's, have been lost recently through inaction and lack of respect for architectural heritage.

-All LAP heritage features as listed in Appendix B: LAP Heritage Features of the Greystones-Delgany and Kilcoole LAP 2013-2019 should be retained in all future CDP/LAPs.

How can we balance the need for new development against the protection of our natural environment?

Are there any buildings that should be added/removed from the Record of Protected Structures?  
How can the County Development Plan encourage the reuse of historical buildings that have fallen into disuse?

Grants for restoration, fines if buildings are allowed to decay to a point where retention is deemed not viable.

The following heritage structures should also be considered for addition:





- Downshill Bronze-Age Hillfort, Coolagad Bronze-Age Hillfort, Bellevue Demesne, Toll-Road/ Norman Path, Woodlands Church

Are there any other assets such as views, trees or natural areas that should be afforded protection as part of the County Development Plan?

How can we encourage the use of green buildings, green streets or other green infrastructure as part of the built environment to enhance quality of life and adapting to climate change?

-The view of the trees at Drummin trees (Scots Pines) should be protected as they are a long-standing and unusual local landmark. They are located just south of Delgany village on the brow of Harmon's Hill. The hill itself should also be protected as an outstanding view.

-The woods behind Glen of the Downs and Kindlestown Woods should be protected. Coillte sold off about 4 acres recently, the woods provide a wonderful amenity for people living locally and we hope that what remains in public ownership can be left that way for future generations to enjoy.

-The view from the front of Kindlestown Woods (towards the Great and Little Sugarloafs) should be preserved.

-There is a particular need to ensure that any structures that are identified as in need of preservation/conservation are protected. Developers who apply for planning on such a site should be penalised if they allow a site to deteriorate to such an extent that it becomes impossible/unsafe to preserve it. The owner of such a site should have a responsibility to maintain it.

-Lower property tax for green buildings ( a national issue but can be lobbied for at council level)

-Please strengthen the awareness and protection of the Glen O'the Downs [SAC] Nature Reserve, the jewel in the crown of Wicklow nature.

- Set policy to monitor and manage the largely-forgotten Western section of the Glen nature reserve and re-connect it to the Eastern section via a number of wildlife bridges over the N11 / M11 and underpass tunnels where suitable

- Please identify the complete Three Trouts Stream River System , the ancient wooded lifeline which created and still flows through the Glen ,as a County Wicklow (Climate and Biodiversity) nature reserve in itself, as well as an extension of the Glen O'the Downs SAC and a key corridor connecting the Natura 2000 sites of the Sugar Loaf, The Glen O'the Downs and the Wicklow Coastal Natura 2000 sites. It should be prioritised for awareness, protection, environmental monitoring, and restoration / re-wilding as a native riparian wooded (oak) wildlife corridor to the maximum extent possible.

- Please identify, map & zone all Wicklow River Corridors & Wetlands for Protection (Waterford last 2 County Development Plans provide a good example). Please state Wicklow policy to facilitate restoration of the natural connectivity, flow and condition of the rivers wherever reasonably possibly, to include completing the removal of unnecessary obstacles / weirs and encouraging fencing / drinking solutions to keep livestock physically back from poaching the river bank, while also preventing overgrazing by livestock and wild animals and allowing re-wilding / native re-forestation.





- Please state Wicklow policy to work closely with LAWPro, EPA, NPWS and IFI to support local communities, land-owners, River Trusts and Tidy Towns groups to protect rivers and re-connect the community to their local lifelines.
- Please study the creation of a new zone type "Land reserved for Nature including Climate & Biodiversity Natural Solutions" and the zoning of Wicklow Rivers and a corridor 50m each side of each river. This could be piloted on selected rivers such as the Three Trouts Stream and The Swan river in Bray. If successful it could be applied to the zoning of other Uplands as well as the Rivers/Wetlands.
- Please further study the option of purchasing (CPO) of these River Corridors for protection, restoration and re-wilding, and call on the Irish Government and other interested Corporate Stakeholders to provide a "Purchase for Rewilding" Fund, as the New Zealand Government have done for their bogs / wetlands.
- Please plan to work with Delgany and County Wicklow Stakeholders to appropriately commemorate the Millenium anniversary of the Battle of Delgany (1021 / 1022) and re-enact the events. Such a Heritage Festival could be extended to include the celebration of 1,500 years of Delgany Village and 5.000 years of settlement in the Glens and the Valley of the Three Trout Stream (including its Neolithic and Bronze Age Hillforts).
- Make more use of dark sky zones and quiet zones
- Protect rivers, wetlands, trees, hedgerows and ecological networks
- consider sustainable agriculture and zone good quality soils on the edge of towns

### **Flood Management**

Please specify that Natural Flood Management Solutions (for Rivers and Streams) must always be tried as the first priority before hard engineering Flood Management solutions

### **Community Development**

Are there adequate community facilities in your area?

If not, what additional facilities are needed?

Delgany has expanded with no additional provision in terms of community facilities.

-Play space: There is no local play area and young families are obliged to drive to Greystones to avail of play facilities. There is a need for a large open, wild play area in which children and older people can play, walk and engage with nature.

-Heritage/Culture/Arts centre: The area is rich in heritage and history yet we have no space in which to explore and preserve this heritage. There is a need for a heritage/community/cultural space to showcase the history of our area as well as displaying artefacts. As an example, there was a find of



historical objects at Rathdown last year, the items found were never displayed locally and we assume that they have been archived only to be seen by researchers.

-Additional Childcare spaces: Planning and Childcare-The way in which audits of available childcare places are conducted needs to be reviewed, perhaps with oversight from or consultation with Wicklow County Childcare Committee. Stated distances of developments from existing developments need to be verified. At present an audit of childcare provision is triggered when a development has in excess of 75 housing units. There is a need to examine the impact of cumulative development on local provision as there are instances of multiple, phased developments which may be planned to circumvent the requirement for an audit of childcare provision.

There is no community childcare facility locally. Parents need to be able to access affordable, high quality childcare in order to facilitate their return to education or to the workforce.

-A suitable premises for our local Family Resource centre: The Greystones Family Resource centre is in urgent need of appropriate accommodation. The current premises is too small and means that activities are curtailed while demand for their service increases.

-All new developments should be landscaped with biodiversity and natural play spaces in mind. This is particularly important if density is to be increased and the concept of the private back garden eroded. We welcome the continued focus on permeability and connected developments which allow ease of access to pedestrians and cyclists.

**Are there adequate facilities in the County to cater for an ageing population particularly in terms of residential and day care facilities?**

-We need additional provision for older adults as well as people with disabilities in order to provide secure and suitable accommodation. Supported living should be encouraged and incentivised-small bungalows or apartments with some onsite supports.

-Access to local amenities should also be provided for those who are older as well as those with disabilities. We do not have any wheelchair access to the sea. Public toilet facilities in Greystones are very limited. We believe that Greystones has long stretches of pathways by the sea, very conducive to wheelchair use. This facility would be greatly enhanced by the provision of a Changing Places toilet facility locally.

-Residential and daycare facilities for those with dementia are very limited and are not secure due to insufficient funding. This needs to be addressed.

**Are the educational needs of our population being met?**

There is a delay in the provision of educational facilities with decisions being delayed until the situation has reached crisis point. There is a need to ensure that sites zoned for education are passed to the Department of Education as early as possible so as to avoid unnecessary delays.

Some parents are experiencing difficulty in accessing early years provision due to huge demand locally.





BIFE in Bray needs full redevelopment (we understand that this is planned). There is also a need to examine public transport links to third level institutions like UCD, Trinity, IADT, DCU. Clermont campus in Rathnew is not accessible from Delgany by public transport, Tallaght IT is also difficult to access.

Due to huge rental costs most Wicklow based students who attend college in Dublin will opt to remain living at home. Their commutes are lengthy, bus and dart connections need to be improved as a matter of priority.

#### What additional facilities are needed and where?

We need to make provision for young people who are not attending school. In some cases an alternative provision might be made. DDLETB provides an alternative learning programme, similar is needed locally.

<http://www.ddletb.ie/wp-content/uploads/2019/05/Youth-ALP-Revised-Booklet-2018.pdf>

#### Where do you think new open space facilities should be provided?

In Delgany on the Carmelite Convent site. There is an excellent opportunity to develop a suite of community facilities like a heritage centre, open play space and equipped playspace.

At the site of the old bandhall in Delgany-plenty of scope to develop a green space that is sympathetic to its natural setting. Its proximity to local schools would mean it could be used as a resource for teaching and learning about biodiversity.

A river walk with local access could be developed as part of any development at the Stylebawn site in Delgany, it would enhance amenities for locals as well as being a welcome addition to any development which might take place at the site.

#### Are the open space requirements set out in the current Development Plan adequate for new development?

#### What methodology should be used to deliver active open space and recreational facilities?

Identify available land in areas with a good population base, require developers to set aside an area of land as part of any planning application in the vicinity.

### Transportation and Infrastructure

#### What transportation improvements are needed throughout the County?

#### How can we encourage more people to walk and cycle and use public transport?

As population has increased we have seen a worsening of public transport options in the Delgany/Greystones area. When DART services to Bray improved, this happened at the expense of the service to Greystones, all at a time of ever increasing demand.







Provide a local loop bus service, this could be done on Chapel Road in Delgany. The road between Delgany and Blacklion is adjacent to 5 schools with a school-going population of about 3,000 pupils. A local service has been proposed in the Bus Connects plan but it may be a low priority for that system which is very focused on provision of arterial routes to the city.

Safe cycle routes need to be provided to encourage cycling. A cycle project officer in the Council would be a welcome addition.

**How can we reduce the reliance on the private car as the dominant means of travel?**

Park and Ride on N11 with bus lanes and a shuttle to connect rapid bus service on the N11 with the DART station

**How can permeability in existing residential areas be improved? Where should major public transport facilities such as park and ride or transport interchanges be located to cater for journeys to Dublin and within County Wicklow?**

Park and Ride on N11, interchange at Loughlinstown as against the Bus Connects proposal to provide same at Bray DART station. How can the traffic delays in Bray town centre be solved?

We need connections to the Luas

Commission an audit of walking and cycling routes to local schools. Identify and document safe routes with appropriate crossing points if needed. Allocate resources to local schools to develop safe routes to schools. Refer to NTA, provide bike shelters and cycling lessons in schools in conjunction with the Local Sports Partnership

<http://www.dublincity.ie/sites/default/files/content//RoadsandTraffic/RoadSafety/Documents/SRST%20Walking%20Bus%20Guide%20Full%2007.pdf>

When schools are on holiday there is a significant reduction in traffic

**Are there any issues in relation to water or wastewater facilities in your area?**

There are areas in Delgany where adjacent development has made connection to a public foul sewer possible. Unfortunately the fees charged by Irish Water are prohibitive. The council should examine some sort of subsidy to make connection possible and to minimise the possibility of polluting a water course. There is sufficient capacity in the system to allow such connections. While this is no longer the remit of the council, planning applications could include conditions to facilitate such connections.

It is worth noting that If the orange/pink routes (N11/M11 SCHEME) go ahead there is a high likelihood that the hydrology and aquifer will be impacted so people in the area who rely on well water will be affected by this proposed development.



## **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 19<sup>th</sup> 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 Kilcrouney junction 7. This very sensible proposal is detailed on their website [www.thisroadisadisaster.com](http://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 J7/8 in 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.

