

*Cabra Community Council
Comhairle Phobal Chabrach*

Ratoath Road/Reillys Bridge Submission

The Safer Option's

“THE SAFER OPTION’S”

Submission to Oral Hearing before An Bórd Pleanála, 28/04/2011,
re. Reilly Bridge, Cabra, D7,
on behalf of Cabra Community Council,
Conference Room, 64 Marlborough Street, Dublin 2

Jack Gannon *in conjunction with:* Aodhan Perry
Secretary
Cabra Community Council
email cabracouncil@eircom.net

The proposed overbridge will see

“a 24% increase in traffic by 2012 and a 36%
increase in traffic by 2027” - Dublin City Council/Iarnrod Eireann EIS page 57

13,062 vehicles use the Bridge every day
So that Overbridge will bring
4,698 Extra Vehicles Per Day (based on Dcc_2007 Traffic Census figures)

Cabra Community Council

<u>Organisations</u>	<u>Abbreviations</u>
An Bórd Pleanála	ABP
Cabra Community Council	CCC
Dublin City Council	DCC
Iarnród Éireann	IÉ
National Roads Authority	NRA
National Transport Authority	NTA

To be displayed

July 1999 drawing - No. S280, John Moylan & Associates

January 2000 drawing – No. R.P. 1157/A - Part of Statutory Display

Enclosures with kits

Enclosures are indicated in the text in square brackets, as in [Encl.1 - exchange of emails]

- 1 Exchange of emails between CCC and DCC re. meeting
- 2 Photo of Height-restricted underbridge in Mulhuddart
- 3 Graphics of Petrucco System and Aqueduct in CCC Newsletter
- 4 Photo of Existing Aqueduct – over M50 at Castleknock
- 5 Aerial photo of Reilly Bridge area
- 6 Photo of cross section of Reillys Bridge
- 7 Photo of rising land to the north of Reilly Bridge
- 8 Tolka Valley Triangle/Guinness Living City Awards, 1994
- 9 CCC, Proposal for: Reilly Bridge, Ratoath Road, Cabra”, May 2008
- 10 CCC, Initial Submission on the New Development Plan, May 2003
- 11 CCC, CTI, Travel Demand Management Study, May 2003
- 12 Photo of underutilised Tolka Valley Road
- 13 Photo of Tonglagee Road underbridge

CONTENTS

	PAGE
<u>(a) Preface to The Safer Option</u>	4
<u>(b) Environmental Impact Statement by DCC/IÉ</u>	6
<u>(c) Community Involvement With Proposed Overbridge at Reilly Bridge</u> . .	8
<u>(d) CCC's Order of Preference and Automatic Gates</u>	10
<u>(e) A Legal Perspective</u>	11
<u>(f) Gradients Etc.</u>	12
<u>(g) HGVs Etc</u>	13
<u>(h) "Embankment Enclosure" with potential for Anti-Social Behaviour Created by Overbridge</u>	16
<u>(i) Visual Impact</u>	17
<u>(j) Biodiversity</u>	17
<u>(k) Cost</u>	18

-oOo-

(a) Preface to The Safer Option's

The amount of work we engaged in on this project was much more than it needed to be. This was because of difficulties we met along the way.

1. Aodhan Perry, on behalf of CCC, sought a meeting with DCC [Encl.1 - exchange of emails] so that we could talk to each other in a way that would enable us to agree certain matters (as in gradients discussed below). No meeting was forthcoming, which led to a great use of ink, and the need for the current oral presentation to be longer.
2. During the legally necessary exhibition related to the proposal in 2000 for an overbridge a drawing "January 2000 – No. R.P. 1157/A - Part of Statutory Display" was shown in Cabra Library. When we went to a subsequent oral hearing, this "January 2000" drawing was not available. Later, another, "July 1999 - No. S280, John Moylan & Associates" was circulated. Excerpts from this drawing are all we have had to go on up to now. ABP, in a letter to Gordon Rowland, Sen. Engineer, DCC on 6 April 2011, asked DCC for cross-sectional drawings, spot levels etc. We are grateful for this initiative by ABP. Such information will provide helpful information, even though it is too late to help us in formulating this oral submission.

CCC has always had a broad approach to the matters under discussion. We absolutely reject any accusations of, "NIMBYISM" (ie Not In My Back Yard). Please look at the map on Page 2 of TVT [Encl. No.7]. This demonstrates that from 1994, and before, our concerns were widely based. A reading of TVT will confirm how much emphasis we put on this – and we give the following quote just as a flavour:

"To try and avoid the problem of different and contradictory demands, this project tries to take a grand view. We start with the proposition the whole of the Triangle is our concern – so that we can eliminate areas of disagreement within it." (Page 9)

On the specific issue of Reilly Bridge, the primary concerns of CCC regarding the proposed overbridge are the health, safety and welfare of our residents, especially our children, our seniors and our school going youth. Expressions of a number of our views may be found in [Encl. No.9, CCC Initial Submission on the New Development Plan, May 2003 & Encl. No.12, CCC CTI, Travel Demand Management Study, May 2003]

Our concerns arise from the proposed construction of an overbridge which will bring about a vast increase in traffic into our residential community.

The influx of traffic is particularly unwelcome due to the presence of the following institutions all along the Ratoath Road:

Schools

Casa Catriona School for disadvantaged children
Coláiste Mhuire
Little Einstein pre-school
Little Tigers pre-school
North Dublin Muslim School
St. Catherine's Primary School
St. Declan's Secondary School for boys
St. Dominic's Secondary School for girls

Schools & facilities which include children with hearing difficulties

Sr. Lydia's Clinic
St. Marian's Junior School
St. Mary's residence for children
St. Mary's Senior School

Recreational Facilities

John Paul Park (Bogie's) sports pitches & playground
Parkside Community Centre, John Paul Park – indoor sports & crèche facilities
Ventry Park Community Centre

Senior Citizen/Sheltered Accommodation

Convent View complex
Bogie's Roundabout complex

The proposed Dublin Deaf Community Village will be an addition to the above.

We believe that DCC and IÉ have a duty of care to protect the health, safety and welfare of the residents of Cabra. We also believe that IE and DCC should conform to National Transport Authority policy objectives such as “that the proposed road scheme will not give rise to a significant or unsustainable increase in the level of car trips – NTA greater Dublin Area strategy 2011-2030 (Chapter 11 ROAD 1 measure (e)). Considering the fact that the EIS identifies the figure of 4,698 extra vehicles per day under the

2027 scenario, you can appreciate our concerns regarding the lack of these in DCC's – IE overbridge proposal.

Another local concern is the negative visual impact that an overbridge will have upon the adjacent homes. Our final concern relates to the possible development of areas of anti-social behavior to the east of the proposed overbridge - and the issues which may arise from this.

In the following submission, we intend to address all these issues in detail and to provide a "Safer Option", which surely should be the aim of all concerned parties.

(b) DCC/IE Ratoath Road Alignment & Overbridge, EIS, Dec. 2010

It is our opinion that DCC/IE EIS 2010 [Encl. No.11] contains fundamental errors in relation to our proposal for an underbridge and canal aqueduct. It is biased in its wholly negative findings on, for instance, "Alternatives Considered" (EIS Page 41).

The simple starting point for our view is the oft repeated reference by DCC/IE EIS 2010 to a 'tunnel' where no such proposal is contained within any correspondence or material we have submitted/produced. The fact that the authors of this section base all their scenarios on this false assumption indicates the flawed nature of their opinions. We have continually submitted a suggestion of a height-restricted underbridge, like the one in Mulhuddart [Encl. No.2, Photo of height-restricted bridge in Mulhuddart], where the road length under the bridge is actually twice what would be needed at Reilly Bridge.

With our proposal, the road length under the railway at Reilly Bridge would be no greater than what is needed to carry the width of two rail tracks (about 20m). It would be suitable for the Petrucco System [Encl. No.3 Graphics of Petrucco System and Aqueduct in CCC Newsletter] which would present no disruption to rail operations. To the north of the railway, after traveling about 15 metres in open air, would be the canal aqueduct [Encl. No.3].

These two underbridges (one under the railway, a different one under the canal - separated by about 15 metres of open air) do not vaguely resemble the "70m" tunnel referred to in "Alternatives Considered" (DCC/IE EIS 2010, Page 4/2).

CCC prefers an underbridge solution to an overbridge. We think that the space below the underbridge should be limited, so that the tallest vehicles which could pass through would be single deck buses and emergency vehicles. This would be a way to keep HGVs away from a residential area, redirecting them to suitable, major arterial routes. An examination of levels show that such an underbridge can have natural, free drainage.

For technical reasons, we continue to refer to our proposal as an, “underbridge”. But someone once said to us, when we explained what we wanted in detail, “You mean a dip in the road like the entrance to Belfield?” This puts it in perspective. Further, there are no slip roads or spaghetti junction type needs that complicate many modern junctions. The rail “underbridge” should be plain and simple and similar to where the Belfast railway crosses over Tonlegee Road. The aqueduct is equally plain and simple.

Our submission also has pictures of the existing and successful aqueduct at Castleknock which spans the M50 [Encl. No.4 – Photo of Existing Aqueduct over M50 at Castleknock]. Our proposed aqueduct would only be a third of the length of this existing one and would be constructed off-site. Just as the Petrucco System (more information available on Petrucco website) would create minimal disruption to rail services, installation of the aqueduct would involve a relatively brief interruption to the waterway, with no interruption to road or rail.

The canal would be carried over the road in a system similar to that used by the Lichfield & Hatherton Canals Restoration Trust in the UK. A Google search for "Lichfield Canal Aqueduct", or the following link, will access the website.
<http://www.lhcrt.org.uk/aqueduct.htm>

Although there are many cases in Ireland of railways crossing roads at high level, a hazard that must always be considered is the possibility of a truck crashing into a bridge, threatening the rail system above it. This issue does not arise with our proposed underbridge. With our proposal, the canal aqueduct will have space for an emergency vehicle/single deck bus underneath it. This determines the height of the road that will pass under the aqueduct and the railway. It will be low enough that a truck could not hit the railway overhead.

Other references by DCC to high retaining walls, access to canal tow paths and attractions for undesirable activity do not stand up. Even the reference to ‘risks’ associated with underbridges reflects more on the author’s views of Irish construction standards than it does with the reality (Ado Perry and Jack Gannon

both have backgrounds in construction). Many of these structures already exist and function properly. All opinions by DCC are based on a flawed premise that a 70m 'tunnel' is the alternative option [Encl. No.5 Aerial photo of Reilly Bridge & No.6 Photo of rising land to the north of Reilly Bridge] whereas in reality, a height-restricted, short length underpass and an aqueduct, of which working examples of both can be found within a five mile radius, are "The Safer Option".

We feel it is worth highlighting that nowhere in DCC/IÉ EIS 2010 do the authors refer to the positive health and safety benefits of having a restricted access policy for HGV's etc., which our proposed underbridge would bring. Surely this must be the primary concern to all parties involved in this proposed development.

(c) Community Involvement With Proposed Overbridge at Reilly Bridge

Ratoath Estate Residents' Association, representing the housing estate south of Reilly Bridge, is a member of CCC. They were involved in the early stages of having a proposed overbridge at Reilly bridge removed from the city plans, through a document called:

"The Tolka Valley Triangle, A Newly Defined Area of North Dublin and An Environmental Window of Opportunity" Jack Gannon 1994 [Encl. No.7 Tolka Valley Triangle/Guinness Living City Awards, 1994]

The document anticipated the completion of the M50 and focussed on the implications of this for the newly emerging, "Tolka Valley Triangle" (TVT) whose three sides were roughly formed by (1) the Navan Road (2) the Finglas dual carriageway and (3) the M50.

The document, combined with a display organised with it, was "highly commended" in the Developmental Project's Category of the Guinness Living Dublin Awards of 1994 (the year the Eurovision, with Riverdance, was outright winner).

Afterwards, TVT was used in a successful attempt to persuade DCC to drop from the city plan an intended overbridge at Reilly Bridge. The overbridge had originally been proposed sometime in the 1950/60s, when Griffith Avenue was the proposed M50 of its day. Even in the early stages, the intention of linking

Griffith Avenue with the Navan Road met resistance from residents' associations in the Navan Road/Kinvara area. They campaigned for the Griffith Avenue proposal to be dropped - and succeeded inasmuch as the idea of bringing the road into their area was discontinued. At the time of the publication of TVT and the construction of the new M50, the remnants of the plan were finally dropped. Tangible evidence of this exists where Griffith Avenue would have, at a high level, crossed the Finglas dual carriageway. Now, new buildings block such a possibility – and what once was called “Griffith Avenue Extension”, to the west of the discontinued overbridge, was renamed, “Tolka Valley Road”.

At the time TVT was written the Pelletstown development did not exist. But this development also blocks the way for any notion of linking Griffith Avenue with the Navan Road.

DCC's present resurrection of the overbridge plan for Ratoath Road is a reminder of those grander (now redundant) plans for Griffith Avenue. Early versions had the overbridge on stilts, placing its architecture in a time when road engineers optimistically looked to a future of high level urban motorways as a solution to city travel. The contribution to society of motorways on stilts has been such that few recommend them any more. But they have made a contribution to the arts.

How often do you see cops and robbers on tv screech to a halt after a car chase, where drug addicts, people living rough and sometimes even dead bodies (according to this genre) can be found under the stilts of a road engineer's faded dream.

There are not many supporters left for this relic of the motor car solution. Could it be that we have lived long enough to see the last rites for the era of “motorways on stilts” in urban environments. Please bear these thoughts in mind when we get to the issue of the, “Embankment Enclosure” below.

In addition, we wish to highlight the underutilised nature of the Tolka Valley Road (photo 12) which could be used as a filter for traffic away from the congestion at Reillys Bridge. The NTA transport strategy for the Greater Dublin Area (GDA) states ***“access to new housing areas will in general be off distributor roads which skirt urban areas rather than running through the centre”*** – Chapter 8 page 6. The majority of the congestion at Reillys bridge is caused by traffic travelling to and from the new housing development in Clonee,

Tyrrellstown, Navan etc., Further congestion was caused by the closure of Dunsink Lane which acted as a traffic access route for many of these vehicles.

The NTA strategy for the GDA 2011-2030 further states that one of its objectives is to *“minimize the physical intrusion of motor traffic”*- strategic sub objective section 3.3. With this in mind, we wish to remind you of the other options available to alleviate traffic congestion at Reillys Bridge.

The re-opening of Dunsink Lane, the usage of the new but unused bus lane at Ballyboggen Road, the development of a park & Ride facility on IE lands at Broombridge station and the filtering of traffic onto the underutilised Tolka Valley Road to skirt the City Centre are all options which should have been used before the ill-conceived solo option of a flyover was proposed.

(d) CCC’s Order of Preference and Automatic Gates

CCC’s opposition to the proposed overbridge at Reilly Bridge is expressed in an order of preference. CCC believes that the first option that should be tried is an automated rail crossing. In these economically fraught times, it is the cheapest option. And during its functioning, a better appraisal of the facts could be made before choosing a more expensive option.

In our campaign to bring a sense of perspective to the issue of automatic gates, we have, in the past, drawn a comparison with what are called, “Merrion Gates” on the south side and Clonsilla Bridge on the Maynooth Line. In relation to the “Merrion Gates”, the number of Darts passing there are significantly higher than numbers passing Reilly Bridge at comparable times. 23 closures in fact (Morning peak times between 7.30 and 9.30). Clonsilla Bridge has a vehicle count of approx. 12,000 per day (DCC 2007) and the gates are semi-automated. Both these rail crossings suffer congestion but are working.

In this regard, we think it would be useful if ABP could determine something which for us has been lost in rumour and innuendo. Is there money available now, especially in the current crisis, to build any sort of structure at Reilly Bridge? If not when might it be available?

If the answers are “no” and “a long time” this has certain implications. We would all be better off if automatic gates were immediately installed. In addition to easing the flow of cars, it would provide an opportunity to monitor whether Merrion’s way could be Cabra’s way (often, we have pondered the

reason why DCC is so niggardly regarding an overbridge at Merrion Gates - while Cabra is so obsessively an intended beneficiary of DCC's largesse. Some offer the idea that the type of people living in the environs of Cabra are more deserving of this type of charity than the denizens of Sandymount – but we could not possibly comment on that ... Let it just be said that if this were an oral hearing about an overbridge at Merrion Gates, DCC would be up against people somewhat socially removed from a couple of building workers and ordinary householders).

If, with time, it transpires that the automatic crossing is inadequate, then the next best environmental option is an underbridge.

(e) A Legal Perspective

The projected DCC overbridge will create enormous health, safety and environmental problems. To deal with this issue we suggest learning from employment law.

Up to the 1980s, safety at work was mainly handled by reference to the Factories Acts (FAs), and a common law duty of care. By the 1970s the FAs were felt to be inadequate. Two new acts, "The Safety in Industry Act, 1980" and later, "The Safety, Health and Welfare at Work Act, 1989" became law. A *statutory duty of care* was created with the new legislation. Further, everyone related to employment, but especially those who were involved in planning etc., were obliged to engage in certain conscious activities. Some of these were:

- (1) To conduct safety audits.
- (2) To identify potential hazards in existing/new projects.
- (3) To try to eliminate the hazards at source.

We believe it would be beneficial to apply this framework of thought to developments at Reilly Bridge.

HGVs have been responsible for injuries and fatalities on a significant scale in recent years. Commonsense tells us that bringing large numbers of trucks into an area with houses, schools, old persons' dwellings, and buildings to serve people with hearing difficulties is not wise (see detailed list of institutions above).

Such an influx should not be allowed in the case of Reilly Bridge without a written document from DCC attempting to justify it, in which, as with employment law:

- (a) The people recommending the project are clearly identified so that there is no confusion over responsibility.
- (b) An examination of anticipated environmental hazards takes place - and is made publicly available.
- (c) DCC explains how any environmental hazards are to be dealt with, **elimination at source being the preferred choice of all good employers.**

Our understanding is that there is no statutory requirement for this. But common law may be another matter, if it is thought that foreseeable injury was a factor.

(f) Gradients Etc.

CCC was of the opinion from early on that the very putting in place of the overbridge by DCC would create serious health, safety and environmental problems, especially in the matter of threat to life and limb.

DCC officials published “Construction of a New Bridge at Reilly Bridge, Ratoath Road” in April 2008 (DCC April 2008). It advocated an overbridge at Reilly Bridge. In the same document, under “Design and Construction of a New Tunnel” and “Allowable Road Gradients” they said that the gradients needed for an underbridge, “are far in excess of the maximum recommended gradient of 6% specified by the National Roads Authority and cannot be recommended.”

An unsuitable gradient was the only argument put forward at this time for rejecting the underbridge. CCC replied with, “Proposal for: Reilly Bridge, Ratoath Road, Cabra”, May 2008 (CCC May 2008) [Encl. No.8]

In that document, we showed that the gradients were not too steep and did not exceed the maximum specified by the NRA. We urge a reading of CCC May 2008 (Page 4) which deals with the matter in detail. Also, it deals in greater detail with other matters that we can only touch on in this oral hearing.

Then, (possibly in reply to our document) council officials distributed to the local Area Committee another document, “Dublin City Council, Reilly Bridge, Structures Options Report, July 2008”(SO Report 2008). In it, they dropped

their claim that the gradient was too steep. But with new and rather thinner arguments (considered so unimportant they could be left out of the earlier document?) the council officials still recommended an overbridge.

Also, SO Report 2008 is internally erroneous and/or contradictory:

1. It envisages the Petrucco system being extended from the railway northwards (constructing an unnecessary tunnel under 15 metres of what could be open air).
2. Continuing northwards, DCC would install more Petrucco units under the canal, while at the same time, under “Environment and Biodiversity” envisaging “channelization” of the canal. (Of course, the purpose of the Petrucco system is to leave a higher travel-way untouched. If it were used under the canal “channelization” would be unnecessary. The two do not go together.)

For clarity, we repeat our alternative proposal here. Travelling northwards, one would travel under the railway, by courtesy of the Petrucco system. The railway would be out of reach of trucks. Leaving the Petrucco underbridge, one would travel for about fifteen metres in the open air. Then one would travel under the canal, which would provide height-restricted access (as mentioned before, the aqueduct crossing the road would be similar to that used by the Lichfield & Hatherton Canals Restoration Trust in the UK (Encl. No.5).

(g) HGVs Etc.

In the DCC SO Report 2008 figures show that forty trucks per hour in the peak period cross Reilly Bridge, in contravention of the 3 ton limit. In SO Report 2008, DCC predicted significant increases in traffic trying to cross Reilly Bridge. The predicted increase included more illegal trucks (See box on, “Traffic Related Matters” below).

Residents in the area frequently ask the Gardaí to enforce the three ton limit on Reilly Bridge. In fairness, they respond frequently to these requests. But unless a Garda is placed permanently on the bridge, and resources do not permit that, the attempt to exclude all trucks is doomed to fail. This illegal activity takes place even though Reilly Bridge is a sort of natural “chicane” and is difficult for HGVs to negotiate. A new overbridge, without a chicane, will attract many more HGVs, three ton limit or not.

It must be remembered that particular roads have already been developed for HGVs etc. in north Dublin. The M1 from Belfast is one. The M2 from Derry,

although currently undergoing some updating around the town of Slane, is another. The Navan Road is another. But it is clear from DCC figures about HGVs at Reilly Bridge that for whatever reason, probably, for example, a destination in west Dublin and no wish to pay the toll on the M50, some truckers coming into Dublin from the north find it attractive to pass the M50, enter deep into Dublin and rat-run their way illegally across Reilly Bridge.

As far as private cars are concerned local lore suggests that, in the morning rush hour, many leave the congested Navan Road somewhere near Mulhuddart, join Ratoath Road and cross Reilly Bridge hoping to rejoin the Navan Road/New Cabra Road ahead of traffic that remained on the Navan Road.

TRAFFIC RELATED MATTERS

1. An overbridge will see, “a 24% increase in traffic by 2012 and a 36% increase in traffic by 2027” (DCC/É EIS P.57). That is ...4,698 Extra Vehicles Per Day (based on DCC 2007 Traffic Census figures).

-oOo-

2. *NTA Greater Dublin Authority Transport Strategy 2011-2030*

(a) “Minimise physical intrusion of motor traffic”,

3.4 Strategy Sub-objectives: High Level Objective 3 - Improve the built Environment: Sub-objective 3.3

(b) “That the proposed road scheme will not give rise to a significant or unsustainable increase in the level of car trips.”

Chapter 11, Roads freight and travel demand management 11.1 Roads, Measure Road 1 (e)

(c) “Access to new housing areas will in general be off distributor roads that skirt urban areas rather than running through the centre, thus freeing up the necessary space in the centre to provide for walking and cycling and achieve the other objectives already set out above”.

Chapter 8 Planning for Sustainable Living, 8.4 Serving local and strategic travel, Travel within Designated Towns and Designated Districts.

-oOo-

“Between 1996 & 2006, Green House Gas emissions from transport increased by 88%”

Government policy framework Smarter Travel - A Sustainable Transport Future, 2009

-oOo-

“20% of traffic in Greater Dublin Area is trucks, lorries and buses”

National Transport Authority report on 2006 figures

Another feature of the Reilly Bridge area is that despite its supposed impact on people driving home northwards in the evenings, few choose the option of diverting from Ratoath Road onto Broomebridge Road. Broombridge has a straight, one-way (northwards) bridge over railway and canal. But the truth seems to be that if they do bypass Reilly Bridge in this way they find themselves amongst heavy traffic on the north side of Reilly Bridge, with no special advantage. In a word, they learn what traffic management experts all over the world tell us - that in modern cities, the solution can only be found in public transport, congestion charges as in London and a general movement away from the seductive, but false idea, that we can build ever more roads and bridges to get us more quickly to where we are going.

The Government, Dublin City Council, CIE, the Dublin Transport Office, the Railway Procurement Agency among many bodies with authority - periodically make general statements about our need to change to public transport because of commitments originally given under the Kyoto Agreement regarding CO² emissions.

It is generally accepted that Dublin will eventually move to a congestion charge. And it is intended to implement the congestion charge at the canal bridges - which encircle much of Dublin. Reilly Bridge is one such bridge. So why should we develop Ratoath Road as a major route, outside the context of future intentions to limit traffic at the bridge?

Where safety is concerned, we can identify one hazard with an overbridge that puts all other environmental problems in the halfpenny place.

There has never been a fatal/serious injury at Reilly Bridge. The chicane effect of the Bridge slows traffic. But an overbridge would produce a long, straight, downhill run for trucks. To complicate matters, on every schoolday there is intense activity outside the convent gates on Ratoath Road, a few hundred metres south of the Reilly Bridge. Both on arrival and departure, parents' cars flood the area, including footpaths, and many schoolchildren mill about with a traffic warden making brave efforts to control children for their own safety.

If the proposed overbridge becomes a reality, HGVs will often meet this chaotic scene and will have to slow and stop. But a feature of HGVs is that they can be dangerous when they are moving slowly, as well as when they are speeding. For instance, a number of cyclists have been injured/killed in Dublin in recent years as HGVs slowly took corners. The author was a neighbour of someone

who was killed at Doyle's Corner as a juggernaut brought its rear wheels onto the footpath. Recently, a biker friend was stopped in traffic on the quays when a HGV inched forward onto his foot, creating very serious injury. Also, not long ago, a woman on a bike was killed by a truck at Nephin Road Garda Station. It is in the nature of these vehicles that vision is more limited than on cars.

So, for example, we will have very many, very dangerous vehicles making their way into a heavily residential area and one which Ratoath Road South contains the extensive number of institutions and schools referred to earlier in this document.

We would also like to highlight the fact that a vast increase in vehicular traffic which the proposed flyover would bring (EIS page 57) would only lead to congestion further along Ratoath Road, especially at the Bogies roundabout. This congestion would therefore encourage unscrupulous motorists to engage in 'Rat Running' through the narrow residential roads of Cabra to avoid delays. This will lead to further health & safety concerns for parents and householders.

(h) "Embankment Enclosure" with Potential for Anti-Social Behaviour Created by Overbridge

The overbridge requires a structure, rising at its highest to about ridge tile level on the houses of neighbouring Ratoath Estate. Although the original "overbridge on stilts" idea (shades of cops and robbers films) has been dropped, the current proposal will create what we refer to as an "embankment enclosure" – which will be a magnet for anti-social activity.

This "embankment enclosure" would be surrounded by (1) the back garden walls of Ratoath Estate in the east (2) the railway fence in the north: (3) the new two metre screen wall on the rising road in the west, and (4) a small side without a barrier near Ratoath Estate/Ratoath Road junction in the south.

The paradox would be that the proposed screen wall, intended to provide a shield from the rising road, would provide cover from the road for anyone who, for instance, entered the embankment enclosure for criminal reasons such as burglary. The alternative of no screen wall would diminish that cover, but would be likely to give greater encouragement to anti-social behaviour because of easier access - with the added problem that people on the rising footpath

could easily look into the kitchens and bedrooms of many houses on Ratoath Estate.

If the underbridge solution were followed, this area would be flat. This means it would be more suitable for landscaping (who wants shrubs and bushes on a steep slope behind a screen wall?). This would allow for passive surveillance of the area by adjoining households and would eliminate possible anti-social gatherings.

Towards the end of a document which has dealt with the serious issue of threat to life and limb, the embankment enclosure might seem like an inconsequential matter. But people should be aware that, relatively less important though it might be, the creation of this enclosure will mean the creation of a magnet for anti-social behaviour. This in turn will lead to endless calls on Garda time and a significant increase in the type of activities that our local Policing Forum spends a lot of time trying to bring to an end.

(i) Visual Impact

We refer you to the EIS report on visual impact which clearly highlights the concerns of local householders. On page 87 of the EIS, it states “ ***post construction, 8 properties in Ratoath estate will have rear upper floor views either partially or completely obstructed by the proposed road embankments***”. On page 88 of the EIS it again states in relation to adjoining properties “***there will be additional visual impact from elevated lighting at night***”. Our proposal for a height restricted underpass would eliminate all the above issues.

(j) Biodiversity

The SO Report 2008 expresses concern about the threat channelization presents to the linear link of natural plant growth along the towpath and canal bed.

But a short distance westward along the Royal Canal, where it crosses the M50, there is a much longer, 80 metre, channelized aqueduct [Encl. No.4] – with no discernible impact worthy of attention from any authorities we could trace.

In a word, channelization is an environmental issue we think people could live with, balanced against the environmental threat of HGV invasion.

(k) Cost

Under this heading DCC's SO Report 2008 says that an overbridge would cost approximately €4.25m, whereas a tunnel (which we do not envisage) would cost €8.94m. It is likely that the underbridge alternative we suggest would be somewhere in the middle.

Automation of gates is such a cheaper alternative that we have no argument with SO Report 2008 not even producing an estimate of cost.

All over the country overbridges, underbridges, slipways, carriageways, flyovers and tunnels have been built at taxpayers' expense. Reilly Bridge has lasted since 1791. An underbridge should belong to the same order of longevity.

The matters of safety, health and environmental protection cannot be dismissed on an economic whim. The duty of care of our statutory agencies should mean that the economic argument should not be allowed dictate policy.

The period it should be designed for, and the beneficial affect in terms of quality of life, would make an underbridge infinitely more successful.