

Jonathan Magee

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17-03-2021

To: Donegal County Council

Re: *Proposed Variation to the County Donegal
Development Plan 2018-2024 in respect of the
TEN-T Priority Route Improvement Project, Donegal*

Dear Sir,

I am making the following submission in relation to the Ballybofey - Stranorlar section of the proposed variation to the County Donegal Development Plan 2018-2024, in respect of the TEN-T roads project.

1. The Ballybofey - Stranorlar preferred route corridor is not optimal because it dictates a very complex detailed road design going through the corridor as shown in figure 1. There are too many complex junctions, and road closures included for the length of the route, and the corridor is encroaching on too many properties and families that are of strategic importance to the local community. A route corridor much further from the towns would have resulted in a much simpler design with less complex junctions, and less environmental impact whilst maintaining the strategic importance of reducing urban traffic in the area and improving national connectivity.

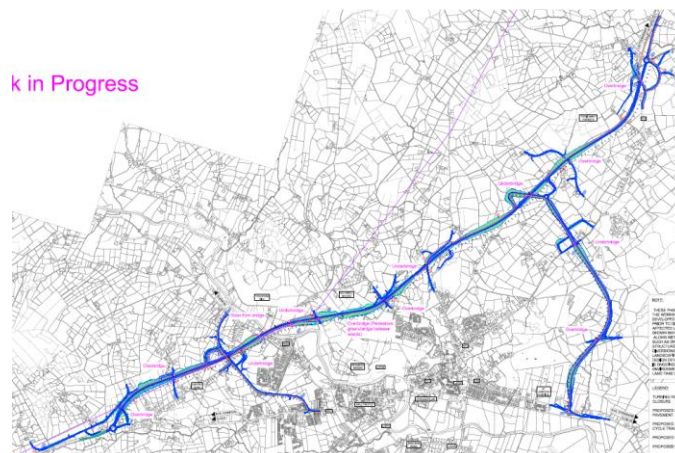


Figure 1. – Overly complex road design dictated by preferred route corridor

2. The original 2001 bypass route design was not granted planning based on environmental grounds south of the river Finn, yet the road design itself was much simpler, see figure 2., which stretched from Cashelnavean (west of Ballybofey) to Kilross (north of Stranorlar). There were only four junctions along the entire proposed road, including two roundabouts at Stranorlar and Kilross and two grade separated junctions at Meencrumlin and Navenny. Four road closures were proposed (two public roads and two private access lanes) with alternative access provided or available in each case. Notwithstanding the environmental issues which eliminated the 2001 route corridor south of the river Finn as a feasible option by ABP, the original 2001 bypass plan on the eastern side of Stranorlar from the existing N15 at Corcam to the N13 at Kilross should have been retained as the current preferred TEN-T route corridor on the Eastern side of the twin towns, and would have provided a more natural route corridor between both national existing primary routes (N15-N13 east of Stranorlar) with fewer junctions necessary and less impact than what is proposed in the TEN-T plan now.

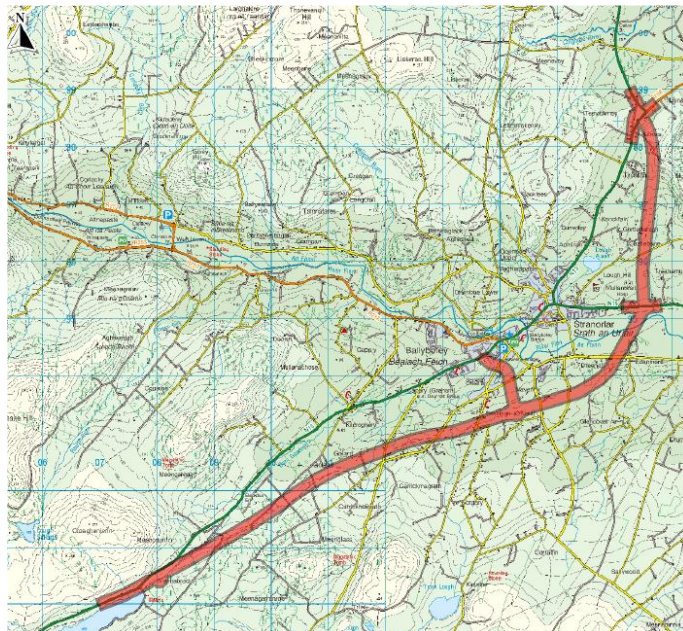


Figure 2. Original 2001 proposed bypass route corridors - terminal junctions much further out of towns and connecting into existing N13 at Kilross. Retaining route corridor East of Stranorlar as shown in this plan would have been better.

3. The route corridor is being partly dictated by unnecessary link roads placing the bypass near the towns to keep the link roads short. Traffic that wants to come into Ballybofey and Stranorlar could have done so by using the existing N13 and N15 from junctions at Kilross on the North, Cappry on the west side, and Corcam on the Eastern side of the towns, regardless of the route corridors. The volume of traffic that needs to enter the Twin Towns for business purposes is such that no greater road capacity is needed than already exists. It is the through traffic requiring extra capacity. The route corridor is too heavily influenced by the canvassed need for short link roads near the twin towns to cater for unquantified passing trade. Passing trade often relates to fuel purchases. Fuel stations could be catered for on the new roads themselves as replacement service businesses, improving the environment, especially as many of the current urban businesses will be a thing of the past in the future, e.g. fossil fuel stations, and many conventional independent retailers.

Unnecessary link roads will not increase trade – innovation in the businesses themselves will drive trade and commerce. The local council has pushed for the link roads and is swaying too far from general TII policy because of this interest, to the detriment of the immediate hinterlands in the proposed route corridors. Protecting the needs of the permanent, local rural community is more important than catering to the few that create passing trade.

4. You'll note that in the original 2001 Ballybofey bypass plan there were three other possible route corridors eliminated, based on their close proximity to the towns. It seems a retrograde step to re-introduce bringing the route as close to the towns as shown in Figure 1.
5. The route corridors are in my view suboptimal and alternatives should be re-examined independently before proceeding or extinguishing prior options. The route corridors could be further north-west on the Donegal side of Ballybofey and further east of Stranorlar for the proposed scheme. The reasons are outlined in points 1-4.