

Objection number **OBJ06B**
Objectors Name Paul O'Neill (Ashton Community Trust)
Date submitted..... 09 March 2015
NIMVO plot number N/A

TransportNI has considered the correspondence in the above objection and responds as follows:

1. Please treat this as a formal submission in relation to the proposed construction of the York Street Interchange.

We are a group of residents and community activists living and working within the Greater New Lodge /North Queen Street area of North Belfast. Our group was formed following public meetings at Clifton House, Tuesday 23rd Sept and North Queen Street Community Centre 13th of October.

We would like to raise a number of points for your consideration. Over the past number of months we have raised these concerns in the form of a letter sent to the different departments involved in the proposed motorway change. We have also spoken in person to DRD /Transport NI and URS officials at;

- **Clifton House, Tuesday 23rd Sept 2014**
- **York Street Interchange Orders Exhibition' in the Ramada Hotel Belfast on 9th February 2015**
- **North Queen Street Park Play Centre Wednesday March 4th 2015.**

We fully understand and appreciate the long term strategic importance of the new road development. However, equally important is the principle of shared decision-making to ensure that this project will not unduly undermine the needs of our community. Given the gravity of this project and its potentially life changing impact on our community we feel that the points raised in this submission should be given the fullest consideration.

2. Residents have serious concerns about the inevitable disruption during construction. They have worries about potential evening, night and weekend working. We believe that the impacts at street level should be clearly illustrated, explained and discussed and mitigation measures agreed in advance with the community.

Construction disruption

- a) Construction-related impacts and overall buildability issues are given very careful consideration by TransportNI. Section 4.7 in Volume 1 of the Environmental Statement (ES) details the proposed construction sequence and construction programme. Construction-related impacts are also assessed and mitigation proposed in each of the technical chapters (Chapters 8 to 17) in Volume 1 of the ES. Moreover, in line with the guidance contained within Interim Advice Note 183/14, an Environmental Management Plan (EMP) has been prepared for the Proposed Scheme and is contained within Appendix 4 in Volume 2 of the ES. The EMP forms an outline plan and is closely aligned with the design and assessment process contained within Part II of the ES (Chapters 8 to 17). The EMP would be further refined and expanded by the appointed Contractor into a Construction Environmental Management Plan

(CEMP) as more information becomes available and there is more certainty in terms of the proposed layout, construction methods, programme and the likely environmental effects.

- b) An indication of likely working hours is outlined in Section 3.1 of the EMP (Appendix 4 in Volume 2 of the ES). This section states that during night working, the Contractor shall not undertake operations likely to result in significant disturbance at nearby sensitive receptors (as illustrated on Figure 13.1 in Volume 3 of the ES) and residential properties, including, but not limited to, Little Georges Street, North Queen Street and Molyneaux Street. Belfast City Council Environmental Protection Unit has powers under the Pollution Control and Local Government (NI) Order 1978 to impose requirements as to the times during which work may be carried out and the methods of work to be used.

Ongoing dialogue

- c) TransportNI is content to meet with local representatives to illustrate, explain and discuss impacts, which would include any proposed mitigation measures. Moreover, a community liaison officer would be appointed for the duration of the works.

3. **In relation to houses at Little Georges Street, our understanding is that the retaining wall to the rear of houses is to be extended upwards and the carriageway moved towards some houses. It seems that existing screening landscape will be removed. There is no indication of safety, visual screening (landscape) and sound screening proposed.**

Retaining wall Clarification

- a) No works are planned to increase the height of the existing retaining walls along the back of the Little Georges Street properties. It is however proposed to steepen the existing embankment to accommodate an increase in carriageway width. The existing landscaping would be removed for construction purposes. TransportNI notes that Table 4.1 in Volume 1 of the published ES provides a full list of drawings that illustrate the Proposed Scheme and would specifically highlight drawing YSI-URS-XX-XX-DR-RE-EW201 that illustrates the proposed retaining solution. These drawings are contained within the separately published Volume 3 of Part 2 of the Proposed Scheme Report (the Engineering, Traffic and Economic Assessment Report).

Safety

- b) TransportNI notes that Table 4.1 in Volume 1 of the published ES lists drawings (YSI-URS-XX-XX-DR-RE-RR101) that illustrate where vehicle restraint systems (safety barriers) are proposed, including along the edge of the widened embankment adjacent to the houses in question. Table 4.1 also identifies the specific drawings that highlight the proposals for landscaping and drawings identified where noise barriers would be located. These drawings are contained within the separately published Volume 3 of Part 2 of the Proposed Scheme Report (the Engineering, Traffic and Economic Assessment Report).
- c) Road safety is addressed within the design by completing a formal Road Safety Audit process. This process is undertaken in accordance with Standard HD 19 of the Design Manual for Roads and Bridges (DMRB). This has required the completion of a Stage 1 Road Safety Audit by an independent audit team, led by a qualified and experienced Road Safety Auditor. This audit included a review of all reported road traffic collision data within the vicinity of the Proposed Scheme to identify associated trends. The proposed vehicle restraint systems

along the verges of the Westlink have been considered as part of the audit process and the Road Safety Auditor has not made any further recommendations in this respect.

- **Any sound and safety screening is likely to add to the obstruction caused by the raising of the new retaining walls which lie to the south (sunlight) aspect of the housing.**
- **No compensation measures such as acoustic glazing are being proposed.**
- **No landscape plan for each house in mitigation is provided.**
- **There are concerns over health and children's play in gardens.**
- **The residents have an established legal 'right to light'.**

Light

d) TransportNI has completed a Daylight assessment of the Proposed Scheme to determine the impacts, if any, on the adjacent residential properties at North Queen Street, Little Georges Street and Molyneaux Street. The assessment has shown that all living rooms, which are the only occupied rooms of the existing buildings that are affected by the Proposed Scheme, would still enjoy adequate daylight after the Proposed Scheme is in place.

Health

e) An Air Quality assessment has been undertaken for the scheme and reported in Chapter 8 in Volume 1 of the ES. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 8.7 of the ES. During the operational phase of the Proposed Scheme, no predicted exceedances of the national objective limit values are expected, thus there would be no significant effects on air quality. Therefore, no specific mitigation measures are deemed necessary.

Visual

f) A Landscape & Visual Effects assessment has been undertaken for the scheme and reported in Chapter 11 in Volume 1 of the ES. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 11.7 of the ES, and a set of Landscape Mitigation drawings are included as Figure 11.7 (7 sheets) in Volume 3 of the ES. Indicative landscape treatment along the edge of the scheme in the vicinity of Little George's Street is included in these drawings (Sheets 2 & 3). The detailed planting schedule would be developed as the scheme design progresses.

Noise

g) A Noise & Vibration assessment has been undertaken for the scheme and reported in Chapter 13 in Volume 1 of the ES. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 13.7 of the ES, which includes the approximate length and height of proposed acoustic barriers along part of the Westlink. An indicative location for the proposed acoustic barrier along the Westlink, in the vicinity of Little George's Street, is shown on Figure 13.3 and on Figure 11.7 (Sheets 2 & 3) in Volume 3 of the ES.

h) Thin Surface Course System (TSCS), otherwise known as low noise surfacing, would also be provided on interchange links between Westlink, M2 and M3, and the slip roads from these to

the local road network. Whilst the noise benefits of this surfacing are mainly evident at higher speeds, there would be some benefits at the lower speeds on the Proposed Scheme. However, no correction for the low noise surfacing has been included in the calculations and, hence, the noise assessment is a worst-case scenario.

- i) With this mitigation in place, properties in Little Georges Street are predicted to experience decreases in noise levels with the Proposed Scheme in operation, as shown on Figures 13.3 and 13.4 of the ES.
- j) The results of the noise impact assessment indicate that no properties would qualify for noise insulation, under the terms of the Noise Insulation Regulations (Northern Ireland 1995).

The widened motorway is only 10 metres away from existing houses, the traffic is being moved one lane closer to some houses, essentially these issues are a 'Catch 22' for the designers; any visual, safety and sound mitigation measures will only add to the obstruction effect of the new retaining wall cutting out southern light rights to existing housing. The re-housing and compensation of residents on this street should be open for discussion.

Conflict between mitigation measures

- k) The provisions for safety, noise mitigation and visual impact are considered appropriate by the design team. The daylight assessment has determined that all living rooms in these properties would still enjoy adequate levels of daylight. TransportNI is content that any potential conflict has been properly addressed.

Rehousing and compensation

- l) Where applicable, compensation would be offered in accordance with the provisions of the relevant legislation (Land Acquisition and Compensation (NI) Order 1973). No residential properties at Little Georges Street, Molyneaux Street or North Queen Street adjacent to the Proposed Scheme have been identified for inclusion within the draft Vesting Order.
- m) Part II of the Land Acquisition and Compensation (NI) Order 1973 includes a right to compensation for reduction in value caused by the use of public works.

Ongoing dialogue

- n) TransportNI is content to meet with local representatives to illustrate, explain and discuss impacts, which would include any proposed mitigation measures. Moreover, a community liaison officer would be appointed for the duration of the works.

- 4. There is a Parade Interface at the bottom of Henry Street/York Road proposed bridge. Residents highlighted that the current screen, wall and fences are part of an Interface during parades where a DOJ project is ongoing. The raised approach road to the York Road overpass will change the nature of the layout. Residents suggest that the issue is addressed with local involvement and with reference to work with existing agencies such as DOJ and local neighbourhood police.**

Parade Interface

- a) TransportNI and their consultants have engaged with residents, the Department of Justice and the Police Service of Northern Ireland with regard to the existing interface. Discussions included the provision of direct connection between Henry Street and the York Street footway (via steps) and the edge treatment to the elevated footway itself. It is accepted that appropriate consultation should be undertaken for this aspect of the detailed design in due course.

5. Noise and Air pollution locally. Whilst the Interchange may reduce these issues on a wider scale local residents have raised concerns about long term exposure particularly in relation to the existing houses 10 metres away from the elevated carriageway and in the area around the former North Queen Street Barracks site with reference to the new housing project which is currently under construction there.

Noise

- a) A Noise & Vibration assessment has been undertaken for the scheme and reported in Chapter 13 in Volume 1 of the ES. This assessment included consideration of committed development and properties currently under construction. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 13.7 of the ES, which includes the approximate length and height of proposed acoustic barriers along part of the Westlink. An indicative location for the proposed acoustic barrier along the Westlink, in the vicinity of Little Georges Street, is shown on Figure 13.3 and on Figure 11.7 (Sheets 2 & 3) in Volume 3 of the ES.
- b) With the mitigation detailed above, properties in Little Georges Street are predicted to experience decreases in noise levels with the Proposed Scheme in operation, as shown in Figures 13.3 and 13.4 of the ES.
- c) Regarding the area around the former North Queen Street Barracks site, currently being developed for residential use (Application Z/2013/0615/F), noise level changes across this area are predicted to range from negligible reductions to negligible increases as a result of the operation of the Proposed Scheme, as shown in Figures 13.3 and 13.4 of the ES.

Air pollution

- d) An Air Quality assessment has been undertaken for the scheme and reported in Chapter 8 in Volume 1 of the ES. Changes in annual mean pollutant concentrations at a selection of representative receptors (which includes the Little Georges Street / North Queen Street area) for the Opening Year (2021) and the Design Year (2035) between the Do-Minimum and Do-Something scenarios are shown in Tables 8.19 and 8.21 in Volume 1 of the ES. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 8.7 of the ES. During the operational phase of the Proposed Scheme, no predicted exceedances of the national objective limit values are expected, thus there would be no significant effects on air quality. Therefore, no specific mitigation measures are deemed necessary.

6. McGurk's Bar Memorial Site. DRD will be aware of the McGurk's Bar Memorials. The road was built over this site. The current proposal indicates a completely rebuilt wall and widened flyover some 5-6 metres over the memorials. The traumatic impact and enduring legacy of the McGurk's Bar bombing on the families of those killed and indeed on the

general New Lodge community cannot be overstated. The enduring emotional and symbolic significance of this memorial site is of huge importance. We therefore suggest that any process relating to the memorial site must be done with the direct involvement and agreement of the relatives of those killed in McGurk's Bar.

McGurk's Bar Memorial

a) TransportNI have already met with representatives of the victims' families of the McGurk's Bar bombing. The necessary removal of the existing memorials would be undertaken sensitively, having taken into account any relevant representations.

- 7. Undercroft and extension of North Queen Street Bridge underpass including ramps and blighted lands adjacent. Some years ago a neighbourhood group worked up proposals at the pedestrian ramps and lands adjacent to the North Queen Street flyover. These blighted lands exist from the earlier road building of the Westlink.**

The left over area is not visually secure or safe, and the ramp walls give cover to anti-social behaviour and stone throwing onto North Queen Street. The proposals create a new similar unresolved space towards the new housing site at the former PSNI station. The Interchange project needs to include addressing the blighted spaces and strips of land caused by the road. This should be co-designed with local groups who understand the context from experience.

North Queen Street Flyover. The flyover is to be widened. Currently it is a dark unimaginative space that blights investment and amenity for wider inner North Belfast. The design, materials and lighting of the space under and the fence over the bridge needs to be addressed and co-designed with the community and wider civic interests, with public space that is of high quality and civic.

Landscape Treatment

- a) TransportNI concurs that treatment of the North Queen Street bridge area would require careful consideration as the scheme design progresses.
- b) Based on the Landscape & Visual assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 11.7 of the ES, and a set of Landscape Mitigation drawings are included as Figure 11.7 (7 sheets) in Volume 3 of the ES. Indicative landscape treatment in the vicinity of North Queen Street bridge is included in these drawings (Sheet 2). This includes proposed enhanced lighting under the bridge, and proposed woodland screen planting adjacent to the new housing site at the former PSNI station.

Strategic Advisory Group

- c) Since finalising the Proposed Scheme Report, including the ES, TransportNI has established a Strategic Advisory Group (SAG) comprising representatives from a variety of government and non-government bodies. The purpose of the group, amongst other things, is to review scheme aesthetics and enhance user appreciation.

North Queen Street Bridge

- d) The extension of the North Queen Street bridge is a matter which the SAG has considered. The group has endorsed the provision of feature lighting to the undercroft area, use of Aluminum Composite Material (ACM) graphics panels on the existing abutments (designed

with local community input) and decorative acoustic barriers along the edge of the structure on both elevations on the Westlink.

- e) During the consultation referred to above with the Department of Justice and the Police Service of Northern Ireland, the existing steps and ramps to the north-west corner of the bridge were discussed. It was confirmed that the area had benefitted from an improvement scheme to address known anti-social behaviour in this location. It is understood that this scheme has been successful in this regard. TransportNI can confirm that the Proposed Scheme would not significantly impact the existing arrangement.
- f) The detailed design of the embankment to the south-west corner of the widened North Queen Street bridge would ensure access is only possible from the Westlink carriageway.

Ongoing dialogue

- g) TransportNI is content to meet with local representatives to illustrate, explain and discuss impacts, which would include any proposed mitigation measures. Moreover, a community liaison officer would be appointed for the duration of the works.

- 8. Traffic system approach to Thomas Street This group of houses exists off a one way system and has only one way in/out. The arrangement is already awkward for residents. Concerns were raised about the construction phase where access may be further restricted and diverted traffic causing increased disruption. Fears of noise, amenity disturbance and drainage during the construction phase in particular were also expressed. The street is currently screened by planting, concern that this will be lost and not replaced.**

Access/Disruption

- a) Construction of the Proposed Scheme would require restrictions on all traffic movements in the area, including Thomas Street. TransportNI is developing a Temporary Traffic Management Strategy for this scheme, in consultation with the emergency services and the local community, to ensure that access is maintained to all existing residential and commercial properties and to minimise disruption on adjacent routes. All traffic management proposals presented by the appointed Contractor would be subject to approval by TransportNI prior to their implementation.

Construction Noise

- b) TransportNI accepts that there would be an increase in noise levels during the construction phase of the Proposed Scheme. The assessment of this impact is described in Section 13.6.2 in Volume 1 of the ES. There are a number of mitigation measures which shall be implemented during the works to limit this impact, as discussed in Section 13.7.2 in Volume 1 of the ES. The Contractor would be required to comply with BS5228 (Noise and Vibration Control on Construction and Open Sites). These guidelines shall form the basis of control and limiting potential impact to noise sensitive receptors.

Construction Amenity

- c) TransportNI accepts that there would be an inevitable perceived disturbance to amenity during the construction phase of the Proposed Scheme, due to transient changes in air quality, noise, visual impact, and local vehicle movements for example. The assessment of these construction-related impacts is described in the various technical chapters in Volume 1

of the ES. There are a number of mitigation measures which shall be implemented during the works to limit these impacts, as discussed in the respective Mitigation & Enhancement Measures section of those various technical chapters.

- d) Construction-related impacts and overall buildability issues are given very careful consideration by TransportNI. Section 4.7 in Volume 1 of the ES details the proposed construction sequence and construction programme. Moreover, in line with the guidance contained within Interim Advice Note 183/14, and Environmental Management Plan (EMP) has been prepared for the Proposed Scheme and is contained within Appendix 4 in Volume 2 of the ES. The EMP forms an outline plan and is closely aligned with the design and assessment process contained within Part II of the ES (Chapters 7 to 17). The EMP would be further refined and expanded by the appointed Contractor into a Construction Environmental Management Plan (CEMP) as more information becomes available and there is more certainty in terms of the proposed layout, construction methods, programme and the likely environmental effects.

Drainage

- e) The appointed contractor would be required to maintain the operation of the existing storm and foul drainage systems in the area during construction of the Proposed Scheme.

Planting Loss

- f) A Landscape & Visual Effects assessment has been undertaken for the scheme and reported in Chapter 11 in Volume 1 of the ES. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 11.7 of the ES, and a set of Landscape Mitigation drawings are included as Figure 11.7 (7 sheets) in Volume 3 of the ES. Indicative landscape treatment along the edge of the scheme in the vicinity of Great Georges Street / Thomas Street is included in these drawings (Sheet 3). This proposes street trees and a grassed strip. The detailed planting schedule would be developed as the scheme design progresses.

- 9. Equity and compensatory projects. The Interchange is suggested to be of regional importance for DRD extending throughout the East coast between ports and trunk routes. The project has, as drawn, large negative impacts both at a personal street scale and for the wider neighbourhoods. Along the route, it is our community that suffers severe negative impacts without any sense of equity and compensatory measures in amenity. In the region we observe rural and urban areas where roads are screened with large areas of careful tree planting, stone walls (such as the road through Cultra) along with roundabouts and urban approaches where large investments have been made in visual amenity. We believe the same approach must be taken in our area. Compensatory projects should be undertaken in a co-design approach that clearly demonstrate that our area has been respected and treated in an equitable manner with the expenditure of such a significant amount of public funds.**

Visual Amenity

- a) A Landscape & Visual Effects assessment has been undertaken for the scheme and reported in Chapter 11 in Volume 1 of the ES. Based on this assessment, appropriate mitigation & enhancement measures have been developed and reported in Section 11.7 of the ES, and a set of Landscape Mitigation drawings are included as Figure 11.7 (7 sheets) in Volume 3 of

the ES. Indicative landscape treatment along the edge of the scheme is included in these drawings. The detailed planting schedule would be developed as the scheme design progresses.

Strategic Advisory Group

- b) Since finalising the Proposed Scheme Report (including the Environmental Statement) TransportNI has established a Strategic Advisory Group (SAG) comprising representatives from a variety of government and non-government bodies. The purpose of the group, amongst other things, is to review scheme aesthetics and enhance user appreciation.

Ongoing dialogue

- c) TransportNI is content to meet with local representatives to illustrate, explain and discuss impacts, which would include any proposed mitigation measures. Moreover, a community liaison officer would be appointed for the duration of the works. However, TransportNI is not empowered to fund community projects on an *ad hoc* basis.

DRD TransportNI
Eastern Division
02 October 2015