

The Secretary  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1

**AN BORD PLEANÁLA**  
LDG. 020649-19  
ABP. 2311012019 (Stamped) *AVR*  
04 NOV 2019 (Stamp)  
Fee: € 50 Type: cheap  
Time: 9:47 By: Rep Post

*in error)*

Darren Frehill  
18 Ard Na Gaoithe  
Clybaun Road  
Galway

21<sup>st</sup> October 2019

Re: **Proposed N6 Galway City Ring Road.**

Dear Sir / Madam,

I write in respect of the above public consultation and enclose the statutory fee of €50 for the making of this observation.

As the owners of No. 18 Árd na Gaoithe, we note with interest the recently submitted response to further information on this project. While we are supportive in principle of the new road, we have a number of concerns in relation to noise and landscaping proposals as they relate to our property and those of our neighbours.

#### **Noise**

The Request for Further Information required the preparation of a revised traffic model exercise for the proposed road having regard to the National Planning Framework growth projections for Galway. We note that revised noise model results in an increase of 0.6 dB in the noise level at our property, taking the reported residual noise level with mitigation to 58 dB Lden in the 'do something' scenario. This is extremely close to the design goal of 60 dB Lden. A number of questions arise in relation to same:

#### *Baseline Data*

As previously raised in the submission on behalf of Árd Na Gaoithe Residents dated 20<sup>th</sup> December it is considered that the baseline noise survey locations used in the estate were "deficient" insofar that more representative locations should have been used, specifically, at locations likely to be impacted more by the development i.e. those on the northern side of the estate.

As it stands, it is not clear if the selected survey locations have given rise to a lower baseline on which road impacts have subsequently been modelled, and as such, if the reference 58 dB Lden will actually be higher at both our property and those adjoining.

#### *External Amenity Areas*

BS 8233:2014 Guidance on sound insulation and noise reduction for buildings states that "the acoustic environment of external amenity areas that are an intrinsic part of the overall design should always be assessed and noise levels should ideally not be above the range of 50-55 dB." It is unclear if external noise has been considered as part of the completed noise assessment. Using the reported figures in the RFI response, it is evident that ambient noise levels in private gardens and public open space areas in the estate will exceed this standard, which has been applied routinely across other road schemes in the country. Again,



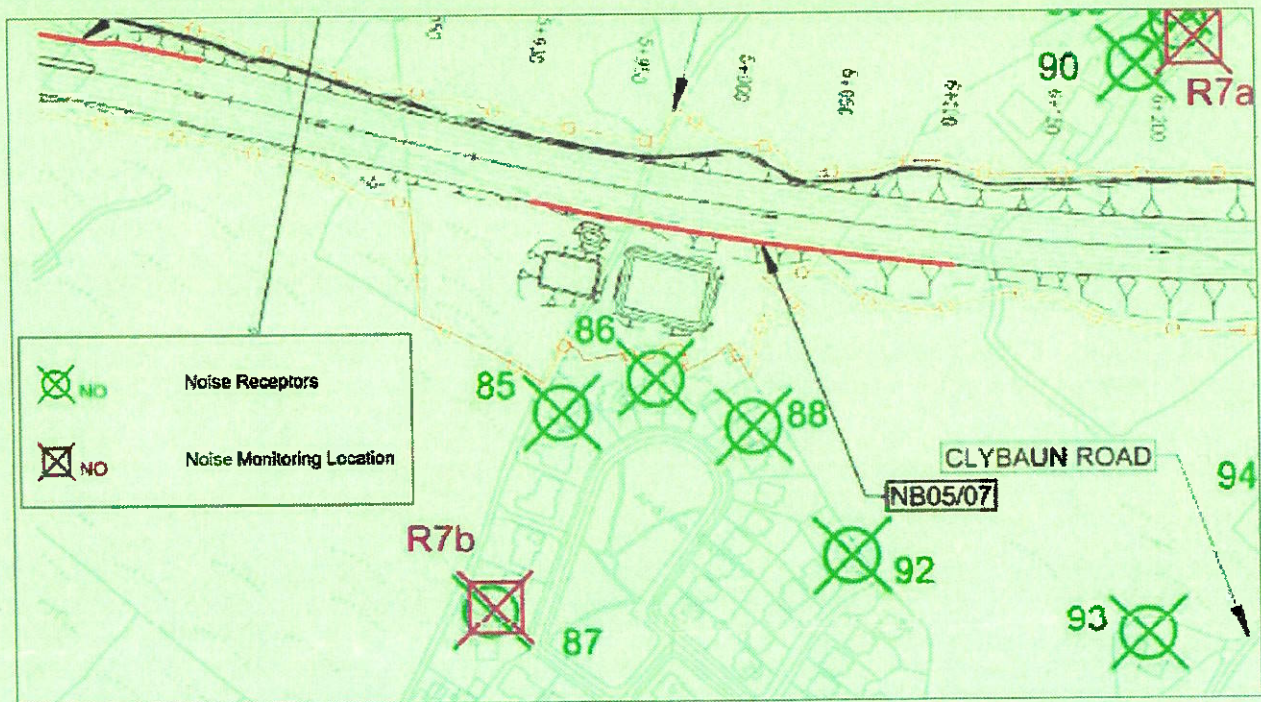
the aforementioned potential shortcomings in the baseline noise data means reported figures may actually be higher in practice.

Further, the Environmental Protection Agency (EPA) published "Guidance Note for Noise: License Applications, Surveys and Assessments in Relation to Scheduled Activities", (NG4, January 2016) addresses noise from licensed activities at Noise Sensitive Locations (NSL). The guidance states "the application of controls and limits should seek to minimise the amount of noise to which people are exposed. Examples of such locations includes dwellings, hospitals, schools, places of worship and areas of high amenity". Noise limits in NG4 are based on the principle that an NSL "for its proper enjoyment requires the absence of noise at nuisance levels". The EPA sets a daytime limit of 55 dB(A), reducing to 50 dB(A) in the evening and 45 dB(A) at night.

### Mitigation and Monitoring

Table 17.13 of the prepared Environmental Impact Assessment Report (EIA) acknowledges that mitigation measures are needed to achieve a noise reduction to design goal standard at our home. A 2 m barrier is proposed (NB05/07). Based on a review of proposed levels, the N6 will be sited approximately 1.5 -2 m above our property. It is unclear if a 2 m barrier will appropriately mitigate noise at upper floor levels and/or if a barrier of increased height would be of greater benefit. A specification for the proposed barrier in question and a cross section of the interrelationship between the proposed road and Árd na Gaoithe estate is necessary to quantify potential impacts.

Once the development is completed, it will be necessary to monitor impacts. We note the position of the proposed noise monitoring location R7b (extract below). This is remote from the properties most impacted by the proposed development and not a reasonable basis on which to monitor impacts.



### Landscaping

I note the proposed boundary treatments between our property and the proposed surface water attenuation ponds. The engineered ponds themselves are to be enclosed with industrial paladin fencing. We have a first floor balcony on our property with views out over this area and this paladin fencing will be very close to our property boundary. It will be highly visible from all upper floor windows materially impacting aspect and amenity. It is considered that this could be softened significantly by the introduction of a treeline/planting around its perimeter and we respectfully request that appropriate consideration be given to this.

**AN BORD PLEANÁLA**  
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I would also be grateful if you could acknowledge receipt of this submission by way of written reply.  
If you have any questions regarding the contents of this letter, please contact me on the number below.

Yours Sincerely

\_\_\_\_\_  
Darren Frehill



**AN BORD PLEANÁLA**

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