Our Case Number: ABP-306146-19

An Bord Pleanála

Conor Enright
Ballyclough
Askeaton
Co. Limerick

Date: 9th December 2020

Re: Foynes to Limerick Road (including the Adare Bypass) including all ancillary and consequential works.
Shanagolden, Craggs, Askeaton West, Lismakeery, Nantian, Riddlestown, Rathkeale Rural, Rathkeale Urban, Dromard, Croagh, Adare North, Adare South, Clarina and Patrickswell, Co. Limerick.

Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

A receipt for the fee lodged is enclosed.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

As the Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development the person conducting any oral hearing into objections to that compulsory purchase order shall be entitled to hear evidence in relation to the likely effects on the environment of the proposed road development. The Board shall also make a decision on both applications at the same time.

You will be notified of the arrangements for the opening of any such oral hearing.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1890 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Somers
Executive Officer
Direct Line: 01-8737250

HA02A

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1890 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

AN BORD PLEANÁLA
LDG- 033256-20
ABP-
02 DEC 2020
Fee: € 50 Type: Cash
Time: 17:09 By: Courier

Ballyclough,

Askeaton,

Co. Limerick

27th November 2020

Case Reference: ABP-306146-19 FOYNES TO LIMERICK ROAD (INCLUDING ADARE BYPASS)

By Hand.

To whom it may concern,

I wish to respectfully make the following submission in light of the recent Limerick City and County Council's publication of further information in relation to the above named project. As a worried landowner, environmentalist and commuter, I have grave concerns of the design approach adopted, the imminent destruction of habitats and flora as well as the enormous destruction of the beautiful County Limerick countryside if this project proceeds in its current form.

1. *The Implications of the proposed road development for proper planning and sustainable development.*

Firstly, it needs to be made clear that from the outset it is clear the objective of this scheme has been to incorporate an improved road link from the Port of Foynes to Limerick city with a bypass of Adare. This has been very disappointing from an engineering standpoint. These should undoubtedly be standalone projects which would itself be evident by a brief glimpse at any map of the county of Limerick. Understanding the constraints from the route options considered I fully believe Limerick City and County Council have adopted a "two birds, one stone" approach to fixing two very separate and complex transport issues.

It is well documented that the town of Adare needs a bypass. However, previous plans for this have adopted a much more contained scheme, not requiring as extensive damage to habitats, greater quantities of carbon creating materials to be hauled and machined into place. The current plan to introduce a motorway to Rathkeale needs serious evaluation. One must consider the overall benefit of this expansive road network and the time saving it will give to road users. Further West of Adare and Rathkeale on the N21 are the current bottle necks of Newcastle West and Abbeyfeale for those continuing this far. In the event of bypassing Adare, any time savings gained will inevitably be lost as the road user will face congestion in the aforementioned towns which currently have only minimal traffic congestion due to the steady flow of traffic throughput. Obviously, the intention may be to create a motorway from Limerick to Kerry in time; however an over the top piece of isolated infrastructure in the absence of any grand plan for the N21 is hence questionable. Is this proposed scheme more a want than a need on behalf of Limerick City and County Council?

As a road user of the N69, I fully agree that the current road is not fit to handle the existing demands from both private car users and heavy goods vehicles (HGV's henceforth). The predominant issue is the lack of areas to safely overtake fully loaded HGV's which often times travel as low as 75km/h

outside of speed limited towns and villages. Hence, this causes a build-up of cars behind these HGV's and increase journey times. Yet journey times on the N69 from Limerick toward Foynes do not seem to experience these delays as most HGV's are unloaded and travelling between 80 to 90km/h. As a result, the predominant issue with the existing N69 is the inbound traffic from Foynes to Limerick.

There has been no previous need for an upgraded road network from Limerick to Foynes until the initiation of the Foynes to Limerick Road Scheme in 2014. The Limerick County Development Plan 2010-2016 and adopted until 2021, which should the primary source document for any development within a county, makes a mere reference to a new road link between Foynes and Limerick, the last objective of 23. Yet here in 2020, this objective seems to have leap frogged other more critical projects, most obviously the M20 Limerick-Cork motorway. This is not what is portrayed in the EIAR submitted for this proposal. An extensive research exercise seems to have been undertaken to convolute an argument whereby there is a glaring need for this project. In fact there are parts of the County Development Plan which support the upgrading of the existing N69. For example, P. 8-18 Objective IN O22:

> *Promotion of improvements to the N69 Limerick to Foynes: It is the objective of the Council to promote the strategic improvement of the N69 between Limerick City and Foynes to facilitate traffic by heavy goods vehicles into this important port from an easterly direction.*

On top of this, the National Development Plan 2018-2027, outlines its list of transport priorities on P.41 which is also shown below in Figure 1. Interestingly, this project does not feature on this priority list. Indeed, a critical infrastructure project urgently required to benefit the entire counties of Cork, Limerick and wider Mid-West region is the planned M20 motorway. Although currently in Phase 1 design, one would have to seriously question the priorities of Limerick City and County Council in progressing with this particular project when it is at odds with the National prioritisation of road projects. The Foynes Limerick Road is mentioned once within this plan.

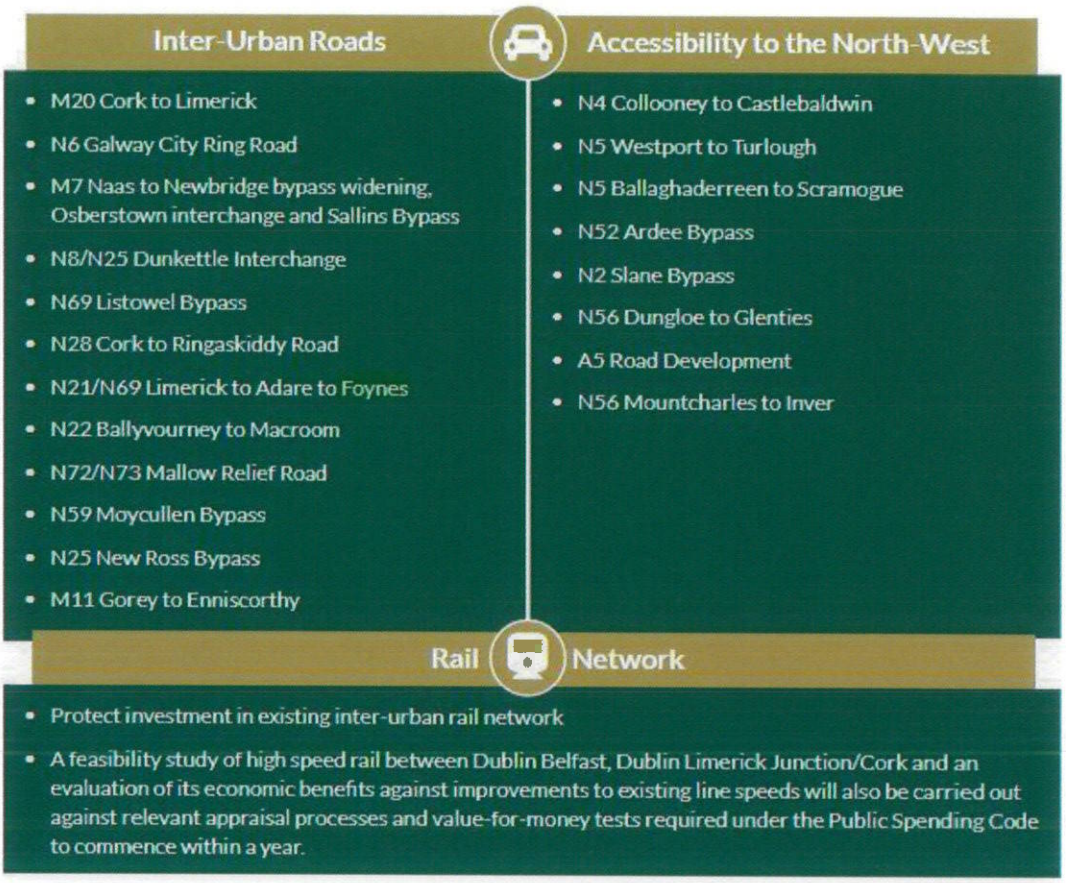


Figure 1 – Extract from National Development Plan 2018-2027 (P.41)

A review of the National Planning Framework 2018 is identified within Chapter 2 of the EIAR as notably supporting this proposed road development. However, there is no such mention of a complete new road scheme from Limerick to Foynes. The below extract details what is actually specifically mentioned in regard to connectivity between Limerick and Foynes:

Ports

Improve land transport connections to the major ports including:

Facilitating the growth of Dublin Port through greater efficiency, limited expansion into Dublin Harbour and improved road access, particularly to/from the southern port area;

Enhancing road connectivity to Shannon-Foynes Port, including local by-passes; and

Improving access to Ringaskiddy Port.

National Strategic Outcome 6, P. 145

Enhancing the road connectivity between Limerick and Foynes with localised by passes would not signify a 35km intrusive and destructive road which there is little mathematical basis for.

The inclusion of Foynes Port as part of the European TEN-T core network is the fundamental reason this proposal for a new road has been arrived at.

Firstly it should be noted that these TEN-T requirements were drawn up in 2013. It cannot be denied that the world, and indeed the European Union, was in a complete different mind-set and outlook at that time compared with the very different one we find ourselves in today. The environmental challenges we all face as individuals and as communities are extraordinary. The way we previously have lived our lives cannot continue. The overall objective to connect both core and comprehensive networks across Europe through the construction of thousands of kilometres of intrusive and carbon creating motorways is completely unsustainable.

The possibility of a significant revision of the European TEN-T guidelines is something which needs to be considered by Limerick City and County Council. There is currently a review of the European TEN-T regulations as we speak, see press release available at the link below:

> https://ec.europa.eu/transport/themes/infrastructure/ten-t/review_en#:~:text=In%20line%20with%20the%20Action,be%20organised%20in%20autumn%202020.

An extract detailing the reasons for the current review is outlined below:

> *The Trans-European Transport Network (TEN-T) policy supports and symbolises connectivity and accessibility for all regions of the Union. Through several revisions, the policy has coped with growing transport demand, geo-political developments (several EU enlargements) and evolving transport policy challenges (e.g. liberalisation, standardisation, technological innovation). The time has come for further reflection.*
>
> *Transport in Europe is facing unprecedented challenges, namely with regard to sustainability, user-driven mobility and technological progress, as well as following the coronavirus outbreak. These challenges call for new solutions. TEN-T policy must keep up with and even second-guess developments to ensure a future-oriented, sustainable transport system, which is why it is currently being reviewed.*
>
> *In line with the Action Plan included in the Commission's Communication on the European Green Deal, a proposal for a revision of the TEN-T Regulation is planned in the second quarter of 2021. A consultation as part of the impact assessment will be organised in autumn 2020.*

The above statement clearly outlines the European Commission's support for sustainable development and the need to reflect on previous guidance issued in 2013 when we collectively were much more ill-informed with regard to the environmental challenges we all face.

For the reasons outlined above, I believe this proposal in its current form needs significant reconsideration. There is no doubt that there are issues with the current N69 road. However a workable solution that has the minimalist impact on the environment and supports sustainable

transport of goods needs to be found. I feel that it would be inappropriate to proceed with this proposal until the review of the European TEN-T proposals is completed. This is paramount considering it is the only plausible basis and catalyst for this entire project.

An analysis of the need for the project and the predicted journey times uncovers some extremely alarming oversights. Most notably Section 5.5.4 of the EIAR states:

> *The growth in traffic for Shannon - Foynes Port was projected using estimated future tonnage provided by Shannon - Foynes Port Company (SFPC) from their Vision 2041 masterplan document..... Projected tonnages for the Port were converted to HGV movements based on estimates in relation to average HGV load size and number of movements per load.*

It is absolutely barbaric that the designers of the scheme, under the direction of Limerick City and County Council should adopt such an approach. Shannon- Foynes Port Company is a private entity with many different vested interests. One of which is the continuous search for private investors to contribute significant financial investment into the company. There is no doubt that the most optimistic and idealistic approach was taken during the compilation of this Vision 2041 masterplan document.

It needs to be clearly understood that Shannon Foynes Port Company is a consortium of six different ports also namely; Foynes Port, Limerick Docks, Shannon Airport, Moneypoint, Tarbert Island and Aughinish. Each focuses on different industries as outlined on the SFPC website:

> *Foynes is the main deepwater facility catering for all key cargo classifications and with a substantial land bank and large storage facilities.*
>
> *Limerick Docks occupy a city-centre location some 100km inland from the mouth of the estuary, at the heart of the thriving Mid-West region of Ireland.*
>
> *There are four dedicated terminals; Shannon Airport with its aviation fuels terminal, Moneypoint and its modern coal transhipment facility, Tarbert Island for heavy fuel and Aughinish catering for bauxite and alumina imports and exports.*

Accordingly the SFPC Vision 2041 Masterplan, and projected growth figures, relates to the six different terminals outlined above. Any growth in goods travelling through Shannon Airport, Moneypoint, Tarbert Island and Aughinish terminals will have zero effect on this proposed road development or the existing N69 route. Any growth in throughput at Limerick Docks should not contribute any significant amount of additional vehicle movements on the N69 either.

From my reading of Chapter 5 of the EIAR prepared, I don't believe this has been accounted for. Hence, the predicted movements for this proposed project has been unquestionably over exaggerated. This has a knock on effect on the cost benefit analysis for the project and the perception that this is the most favourable route. This exercise must be recompleted in order for a fair and accurate comparison of options to be arrived at.

This Vision 2041 Masterplan document was also, similar to the European TEN-T regulations, prepared in 2013. Again, the relevance of this plan to the current situation we find ourselves in today's much evolved world has to be questioned. The Masterplan identifies Shannon-Foynes Port Company (SFPC) as Ireland's largest bulk port authority. This is further broken down into two predominant areas. Section 5.4.1 of the masterplan states:

> *Bulk Solid includes products from the agricultural, energy, mining and construction sectors. The material in bulk includes grain, animal feeds, fertilizer, cement, petroleum coke and scrap metals. SFPC also handles project cargoes – typically large scale structural components wind farms*
>
> ..... *To accommodate the existing and anticipated level of trade in bulk solid and to facilitate other types of freight activity over the period of Vision 2041 some improvements and consolidation of existing areas for handling these materials will be required. Some additional facilities may also be required to accommodate growth in specific commodities.*

It is evident that a large amount of raw inputs required for the agriculture industry that serve the entire country are imported via Foynes Port. The expansion of the dairy sector in Ireland has undoubtedly helped to maintain throughput within this sector. However, the latest developments in this industry are looking towards a halting or even decreasing the national dairy herd. The attempts to minimise the greenhouse gas emissions from the industry will also require a decrease in the use of concentrate animal feed and chemical fertiliser. The raw materials required to manufacture these farm inputs make up a substantial amount of the goods imported through Foynes port. Hence, in the next five to ten years the tonnage and consequently HGV movements to the port will have to substantially decrease. There seems to be no evidence of an allowance for this in Chapter 5 of the EIAR as it has been based on the 2013 SFPC Masterplan.

The majority of chemical fertiliser inputs imported through Foynes Port are delivered via HGV's to Goulding Fertilisers, Morgan's South, Askeaton, Co. Limerick, a mere nine kilometres from Foynes Port as can be seen in Figure 2 below.

The proposed road development will not have any effect on the transport of goods from Foynes Port to Goulding's as HGV's will have to continue to use the existing N69. Consequently, all projected tonnage and HGV movements in relation to this facility should be stripped from this proposed road. As it stands, these would be included with the SFPC masterplan and correspondingly all chapters of the EIAR. It would also be used within the cost benefit analysis for the scheme which is incorrect.

Figure 2: Proximity of Goulding's Fertiliser Manufacturing Facility to Foynes Port

The largest importer of animal feeds through Foynes Port is Roches Feeds, Dock Rd. Limerick. The majority of grain imported through Foynes Port is stored in warehouses in the port for this animal feedstuffs supplier. There are numerous HGV's transporting this grain to Limerick daily. However, from personally talking to the local haulier drivers they unanimously agreed that they will not be using any proposed new road which is routed via Adare. The reasoning is quite clear; the fuel usage use will be dramatically higher by using the longer route at higher speeds. Understanding that road haulage is an extremely competitive market with very fine margins seems not to have been taken into account in this proposal.

The second element to Foynes Port bulk business is Liquid Cargo in the form of fossil fuels. This ranges from the importation of various forms of oil and chemicals. Once again, taking account of the world we find ourselves within today, the volume of these liquids required in this country is set for a drastic fall. For example, the latest Government Green Plan indicates a ban on the sale of new petrol and diesel cars by 2030. So for the design year of 2039 as used in this proposal, how many million litres of oil per year will be required? If the current uptake in electric cars continues, we are sure to see the importation of oil drastically fall. Has the effect of this been accounted for in this proposal? Again, this will unquestionably reduce the number of HGV's commuting to and from Foynes Port daily. The cost benefit analysis for the project needs to take this into account.

Figure 3 below depicts the route as is from Foynes Port to the interchange with the N18. This is the current route used by all HGV's from Foynes Port to the Dock Road area of Limerick and all those

Figure 3: Existing route for HGV's from Foynes port to the Dock Road/N18 Interchange

heading North via the Limerick tunnel to Clare and the West of Ireland. The distance is 33.6km. Using the average speed calculated as part of the data collection in the traffic modelling analysis in

Chapter 5 of the EIAR of 65km/h[1], this would equate to a travel time of 31mins 10 secs. (Allowing for the 60km/h speed limit in Kilcornan, 50km/h in Kildimo, 50km/h in Clarina and 50km/h in Mungret).

Table 5.9 of the EIAR is shown in Figure 4 below detailing the journey times for the proposed scheme:

Roughan & O'Donovan - AECOM Alliance
Consulting Engineers

Limerick City and County Council
Foynes to Limerick Road (including Adare Bypass)

Table 5.9 Journey Time Benefits 2039 Design Year (AM Peak Period)

Journey	Journey Time (minutes)				Average Speed (km/h)				Distance (km)			
	DM	DS	Diff	% Diff	DM	DS	Diff	% Diff	DM	DS	Diff	% Diff
Foynes to Rathkeale (centre)	22	11	- 11	- 50%	56	88	+ 32	+ 57%	21	17	- 4	- 19%
Rathkeale to Attyflin	26	11	- 15	- 58%	40	92	+ 52	+ 130%	17	17	0	0%
Foynes to M7 J 30	41	27	- 14	- 34%	53	95	+ 42	+ 79%	38	42	+ 6	+ 17%
Foynes to N18 Dock Rd.	38	29	- 9	- 24%	52	92	+ 40	+ 77%	32	45	+ 13	+ 41%

Note: DM = Do-Minimum / DS = Do-Something

Figure 4: Extract of Table 5.9 P. 5/27 of EIAR

[1] As stated within the EIAR, although having commuted personally on this road for over twenty years an average speed of well in excess of 70km/h would seem much more reasonable. It should be clarified if this relates to the morning am rush hour and the variance in traffic flow across the rest of the day. Post 10am PCU's dramatically decrease.

I take issue with the fact that an anticipated average speed from Foynes to N18 Dock Road junction of 52km/h has been used. As outlined earlier, there is little concrete evidence to support such future traffic volumes ever being achieved. Hence, any comparison analysis should be undertaken using the current data, the proven 65km/h average speed. Furthermore, the average speed of the "Do-something" scenario is not legally possible for HGV's. Considering this road scheme is to cater for a significant growth in the number of HGV's, from Table 5.7, 21.9% HGV's on Section A & 25.8% HGV's on Section C, how can such design speeds be achieved when almost a quarter of the vehicles cannot exceed 80km/h from Foynes Port to the proposed roundabout at Rathkeale. HGV's can legally travel at 90km/hr when on designated motorways. Compounding this issue is the fact that HGV's will have to come to a complete stop at two roundabouts on the proposed scheme. HGV's fully loaded with at least 25 tonnes of net weight (considering they will be departing from a port is quite applicable) take at least one to two minutes to rebuild up speed from stationery to the maximum permissible. Additionally, any topographical inclines along the proposed route, although within design standards, will reduce the speed of HGV's.

A quick calculation, using the legal speed limits for HGV's for the respective sections yields the following results for the proposed scheme is outlined below in Table 1.

Table 1: Journey time analysis using legal HGV speed limits

From	To	Distance (km)	Speed Limit for HGV's (km/h)	Journey Time (mins)
Foynes	Ballyclough	6.3	80	4.725
Ballyclough	Rathkeale	9.3	80	6.975
Rathkeale	Attyflin	17.5	90	11.667
Attyflin	M7 Junc. 30	10.5	90	7.00
M7 Junc. 30	N18-Dock Road Junc.	3.5	80	2.625
			Total	**32 mins 59 secs***

*Note – no allowance has been made for delays at either roundabout at the end of Section A & B which will add an additional 2 mins minimum to each journey

The above journey time of almost 33mins from Foynes to the N18 Dock Road interchange, and just over 30mins to junction 30 M7, which this proposed road scheme in its current form will present, provides no journey time savings to HGV's. In this instance why would any potential HGV use the route and is it obvious that if constructed, the dual carriageway from Foynes to Rathkeale will be vacant. On top of this, if HGV's chose to use the proposed route which is 10 or 13.5kms greater in length, at higher speeds with higher engine revolutions, it would lead to a significant increase in greenhouse gas emissions versus the same HGV driving at a lower speed for the same length of time.

This also calls into question the decision to propose a Type 2 Dual Carriageway for Section A of the scheme. This was due to the predicted traffic volumes for the design year of2039, on a single carriageway operating at 95% capacity. Yet, with the design anomalies outlined above this also needs to be revised.

The below extract is taken from Section 5.5.4 of the EIAR:

> *Currently 95% of the 100,000 HGV loads that leave the port and head east on the N69. Of this traffic, 65% travels to Limerick city and onward..... For the small proportion of HGV traffic that travels directly from Shannon - Foynes Port to the Dock Road area of*

Limerick City or north towards Clare, the existing N69 route will remain a little more direct than the proposed road development. This traffic accounts for approximately 20% of the existing overall port traffic and will reduce to approximately 5% of overall HGV demand as the port traffic grows in future. However, HGV drivers on this route may choose to use the proposed road instead.

From the journey time analysis outlined above it is totally inappropriate to count this 20% of the current port traffic referred to in the above extract within both the traffic analysis of the proposed scheme and cost benefit analysis carried out. If appropriate consultation was undertaken with the Irish Road Haulage Association and its members, a much better solution could have been arrived at. I would also like to see verification of this 20% figure as it would seem that much more of the freight leaving Foynes Port heads to the N-18 Dock Road interchange.

If this project was to proceed in its current form, the number of users of the new route from Foynes to Rathkeale would be only a proportion of that expected in the 2039 predictions within the EIAR. What I would envisage would be an uptake of private cars using the proposed scheme thus reducing those on the N69. This would reduce some congestion on the N69 route leading to all HGV's travelling to Limerick from Foynes continuing to use the N69 whilst a multimillion euro road scheme, in particular the branch from Rathkeale to Foynes, lay completely underused. Only those HGV's leaving the port bound for the South of the country would use this branch to connect with any future M20 scheme.

Since 2013, there have been further developments within the Port industry in Ireland. The moving of Cork Port to Ringskiddy which was rubber stamped in 2015, and the recent go ahead to construct a new stretch of road, the M28, will result in larger vessels being able to dock at the new Port development on the completion of works. Has the impact of this development on SFPC being taken into account? Geographically with Cork being located closer to Europe will it be a more attractive location for vessels to unload. I understand there are many factors which affect where vessels may dock, yet this needs to be analysed prior to any multi million project being granted permission. SFPC will have direct competition for these larger vessels which it previously had not.

I firmly believe from the points outlined above that there is no solid foundation to the narrative that there is a need for a new road between Foynes and Limerick. A more conservative bypass of Adare would also be less intrusive and more naturally fitting to the landscape. I wholeheartedly believe an approach of improving the existing N69 would be a more advantageous pathway in supporting connectivity between Limerick and Foynes whilst being much more environmentally friendly. To compliment this, the upgrading and reopening of the existing Foynes to Limerick railway line would be a far better and sustainable solution.

The existing Foynes to Limerick railway line is in need of repair but would have the ability to dramatically reduce the number of HGV's serving Foynes Port. The SFPC Masterplan 2041 highlights at length the possibility of reinstating the rail connection between Foynes and Limerick. P.84 states:

Port of Foynes has the most potential to implement a viable rail freight connection which can be reinstated with minimum capital investment.

The 2030 Rail Network Strategy Review (2012) published by Iarnród Éireann identifies the Foynes-Limerick Railway line as a tangible asset for the bulk transfer of freight. It states that it is a "rail connection that can be made operational in a short time period".

There has also been recent support for the reopening of the railway line from Government which was supported by SFPC in the below article:

https://www.irishtimes.com/business/transport-and-tourism/reopening-limerick-foynes-rail-freight-line-makes-sense-says-minister-1.4369536

An extract of Section 3.3.2 of the EIAR is outlined below:

> *The TEN-T regulations also require Shannon-Foynes Port to be connected to the core rail network. Iarnród Éireann and the Shannon-Foynes Port Company have assessed the potential reinstatement of the Foynes to Limerick Railway line as part of a separate study. A rail link to the port might accommodate certain large-volume movements of bulk goods from specific locations close to the national rail network. There are no such existing rail freight services in operation at present in the Limerick region, and the Shannon-Foynes Port Company has indicated that all of their current customers require road access to the port. The main cargo movements at present are imports of animal feed, fuels and construction materials, which are distributed widely across the region by road transport.*

The above extract depicts the total lack of a consistent approach across this proposed scheme. The TEN-T regulations are the primary basis for a complete new road link to be constructed, requiring 389 ha (Section 4.3 Exec. Summary) of land to be acquired and the destruction of many communities, habitats and the splitting of family farms steeped in generations of history. Yet, just because a private entity that is contributing zero financial aid toward the project does not currently have a customer base to support the most sustainable and cost effective solution, whilst supporting it within the public image, should mean this solution should be shelved and forgotten about. Once again this is a barbaric strategy in the current environmental mess we find ourselves in. Has a costing exercise been undertaken by SFPC in this separate study to calculate the cost of adding rail branches to its largest customers? Perhaps say 10% of the €400-450 million allocated to this outrageous proposal could be put toward extending these rail lines to provide a future sustainable transport link. A link that would be guaranteed to be utilised to its full potential and most certainly not be left vacant as is the potential for the proposed road.

I firmly believe the do something scenario needs to be looked at once again. From experience of commuting on the N69, there are at least four sections where overtaking lanes could be installed subject to detailed design in accordance with TII design regulations. These are located within Appendix A of this submission. A combination of a solution such as this in parallel with the upgrading of the existing railway link and new rail branches would be a more environmentally sensitive design and shall allow for any future expansion within SFPC whatever new markets may arise.

2. The likely effects on the environment of the proposed road development

The proposed road scheme in its current form will have a devastating long term impact on the environment. Over 964 acres of lands will be irreversibly destroyed to facilitate this project. Thousands of trees, kilometres of hedgerows, acres of natural woodland and rare wetlands which provide habitats for millions of animals and insects will be bulldozed to undertake an expansive road construction.

One major issue which has not been clarified within the revised information submitted is the issue of blasting of rock on the scheme. Limerick City and County Council in the further information submitted clarified the depths at which bedrock has been encountered throughout the route. However, as per Section 8.4.1.9 of the EIAR, the deficit for the entire scheme is 1.3 million m^3 of fill material required which is further outlined below:

> *The overall project earthworks fill deficit including capping is circa 1.3 million m^3. This is a significant volume of material to be sourced from quarries in the region. The construction contractor may develop borrow pits in suitable locations within the lands to be acquired for the proposed road so that up to 0.5 million m3 of cut material can be used to partially offset the net import volume required. The borrow pits can then be used to deposit unsuitable materials.*

As a local resident, it is quite worrying that this extent of fill material is expected to be extracted from local quarries. This statement also signifies no engagement whatsoever with the local quarries in the area which is quite disappointing from Limerick City and County Council. This demand for additional fill will unquestionably lead to an exponential rise in the frequency of blasting at local quarries, an exponential increase in the number of truck movements on our narrow, rural roads (irrespective of whatever guidance is stipulated drivers will use the shortest possible route) and the creation of millions of tonnes of additional carbon dioxide being released into the atmosphere.

The limestone within this part of County Limerick is an extremely tough rock with very high compressive strengths. The current blasting regime within local quarries has had to be greatly reduced in recent years due to the vibration tremors being experienced within the local community. This has caused huge anxiety to those within a 5km radius of the Quarries in the Foynes and Askeaton areas. Some individuals receive alerts from the quarries in the area to attain prior notice of the blasts as they cannot tolerate being within their own residence when they are triggered. They often drive outside the zone of influence and return when the blast has been completed.

It is worrying that there has not been an in depth analysis carried out for the certain adverse effects of blasting particularly in the Ballyclough cutting from Ch. 5+100 to Ch. 6+400. Table 8.4 of the EIAR outlines a 19m deep cut is proposed in this area. Firstly, the number of blasts to achieve this colossal cut has not been assessed but is undoubtedly in the hundreds. This means that all local residences will be subjected to a consistent string of blasting for over a year I would expect. Coupled with this will be local quarries upping their own blasting regime to fulfil the shear deficit in fill materials required. This will lead to a mammoth bombarding of all individuals within the Askeaton to Foynes area of constant blasting which will have the potential to negatively affect people's mental health,

coupled with likely incidents of their properties being subject to dust pollution and additional noise pollution.

Section 12.5.2 of the EIAR is laudable seeming to suggest that only properties within 150m of these blasts will need to be structurally assessed pre and post these blast events. It particularly highlights the absence of any local engineering involvement in the design of the scheme which is extremely disappointing from Limerick City and County Council. I would invite any of them to visit a property within kilometres of a quarry blast in the Foynes to Askeaton area to experience first-hand the tremors we encounter.

An oversight on this matter is also the number of agricultural slurry storage tanks that are within close proximity of these proposed cuttings. These agricultural storage tanks are typically 2.8m to 3.1m in depth all constructed to various standards i.e. reinforcing details, grades of concrete etc. One common attribute is that they are founded on limestone. More frequent blasting has the potential to introduce cracks within this limestone which could lead to subsidence or settlement issues underneath these tank bases. It needs to be made absolutely clear at the outset, that any damage caused to any agricultural tanks in the area whilst this blasting is proposed to be undertaken, will result in Limerick City and County Council and its appointed contractor being held to the highest letter of the law. There is potential for catastrophic environmental damage to be done if such tanks were to leak to a watercourse or worse, makes its way into an aquifer polluting private wells in the area and in the Foynes/Askeaton area, the Craggs-Barrigone Water Scheme. This element of the proposal needs significant more consideration.

With regard to the zone of influence and in Chapter 14 of the EIAR, I cannot agree with the conclusion that likely impact on Ballyclough House, below, can be defined as moderately negative. At Ch. 20+600 Ballyclough House is within 300m of the proposed road edge. Ballyclough House is a five bay, three storey building which was built in the late 18th Century and still stands tall today. It is a protected structure and listed on both the Limerick City and County Councils list of protected structures and on the National Monuments Map Viewer, see extracts below.

Volume 3 Record of Protected Structures

Reg. No.	Building Name/ Address or Type	Townland and Postal Town / Street or Locale	Ref.No.	Description	6" Map	Notes (including features in the attendant grounds in same ownership)
64	Church	Ballybricken North, Grange	F23(24)	Roman Catholic Church	23	Surrounding churchyard, and the boundary thereof, comprises the curtilage.
65	Springfort	Ballybronoge North, Patrickswell	B12(54)	Country House	12	
66	Ballybrood House	Ballybrood, Caherline	B23(13)	Country House	23	Stables intact
68	Church	Ballycahane Upper, Crecora	G22(45)	Church of Ireland	22	Surrounding graveyard, and the boundary thereof, comprises the curtilage.
69	Duneeven House	Ballycannon, Croagh	B20(1)	Country House	20	
70	Ashgrove House	Ballycasey, Kildimo	B12(35) /D12(F)	Country House- Thatched	12	Rare two-storey thatched house
71	Ballyclogh House	Ballyclogh, Annacotty	B6(10)	Country House	6	
72	Ballyclogh House	Ballyclogh, Rosbrien,	B13(26)	Country House	13	
73	NONE	Ballyclogh, Askeaton	P.P.S. 118	'Concrete Pill Box (1)'	10	Military Infrastructure
74	NONE	Ballyclogh, Askeaton	P.P.S. 119	'Concrete Pill Box (2)'	19	Military Infrastructure
75	NONE	Ballyclogh, Askeaton	P.P.S. 120	'Concrete Pill Box (3)'	19	Military Infrastructure
76	Ballyclogh House	Ballyclogh, Askeaton	P.P.S. 117	Country House and castle	19	Archaeological Heritage Identifier (R.M.P. No. Li-019-236) also present
77	Castle (In ruins)	Ballyculhane, Kildimo	A12(63)	Medieval Structure- Keepless Castle	12	Large rectangular enclosure, 17th Century House & adjacent Bastion
78	'O'Brien's'	Ballyculhane, Kildimo	D12(L)	Thatched Building	12	Lobby Entry thatched house
79	NONE	Ballycullane Lower, Glin	P.P.S. 95	Vernacular farmhouse, associated farmyard and	17	In the attendant lands of the Glin Estate

Figure 5: Record of Ballyclough House as a protected structure within the County Limerick Development Plan 2010-2016

Figure 6: Image of Ballyclough House

Further information on this structure is available on the link below.

https://www.buildingsofireland.ie/buildings-search/building/21901915/ballyclogh-house-ballyclogh-county-limerick

However, the blasting envisaged as part of this scheme could have catastrophic connotations for this listed structure. It is approximately 500m from the large cut areas between Ch. 5+100 to Ch. 6+400. The vibrations associated with blasting as outlined above needs to specifically take account of the vulnerability of this building. It is constructed of beautiful cut limestone which legally needs to be protected if this unnecessary scheme is to be constructed.

What is extremely worrying is that if the project is to be procured as a Design & Build type contract, Limerick City and County Council will have little say in how works are carried out at construction stage. Notably, in the revised information submitted there has been a change to carry out the entire scheme now as one contract rather than two separate contracts as previously advised. There will undoubtedly be time penalties for any delay to the completion of the project. Hence, if the cutting of the large limestone areas are taking more than originally planned there is no doubt the intensity of blasts will increase, working hours on site will increase and any environmental mitigation measures may well be abandoned.

A tone of urgency is evident alone in the response letter from Limerick City and County Council to An Bord Pleanala dated 30th September 2020. I take great issue with the fact that the inclusion of the Ryder Cup in Adare in 2027 is included. This sporting event should not have any bearing whatsoever

in the proper planning of such a significant project. There are set statutory processes which need to be followed. It is extremely disappointing to see such a narrative by Limerick City and County Council which is quite disrespectful to those adversely affected by this project. Homes are set to be destroyed, family farms obliterated, businesses gone and the livelihoods of thousands of people irreversibly negatively affected. The Ryder Cup is pretty meaningless to these unfortunate people.

Indeed, the entire EIAR is filled with great hope of the correct environmental processes to be followed and mitigation methods adopted during construction. Yet, during the site investigation works undertaken a much different approach seems to have been adopted.

Figure 7 below shows photos of the rotary cores being undertaken at RC 10-09 on our lands. During this process the grout used to cement the liner in position was dumped into a tributary of the Lismakeery Stream. The contaminated water which arose from the rotary core was also directly discharged into the stream. If this is the lacklustre supervision approach adopted during the routine site investigation works with one machine, what possibility is there of Limerick City and County Council monitoring a single 35km long construction scheme. This was the only rotary core II inspected but one ponders the approach adopted elsewhere.

Figure 7: RC 10-09 being carried out on the 26th April 2017 showing pollution to a tributary of the Lismakeery Stream

With regard to the road drainage design, it is noted within Section 4.10.5 that the attenuation ponds shall be designed to store a 1 in 100 year rainfall event and the discharging as such will be comparable to green field run off rates. I would have grave concerns about this approach on all streams that are not managed by the Office of Public Works (OPW). These streams are often times not maintained downstream, which leads to water backing up further upstream. If the OPW manages the stream or watercourse, it is cleaned along its entire length as part of a management schedule. This ensures water can freely move downstream and does not flood land further upstream.

The topsoil organic matter in the lands surrounding the Lismakeery Stream in particular would be of a peat nature with an extremely low permeability. As a result, there is quite poor land drainage in some areas. There are multiple locations where water ponds on the surface for a number of days or where the Lismakeery Stream overflows into after periods of moderate to high rainfall. This occurs quite regularly. The proposal to add the discharge from these attenuation ponds will undoubtedly compound the existing flooding issue. This will have the knock on effect of flooding even more lands both upstream and downstream from the overflow of the stream. This will not be confined to the Lismakeery Stream but for all outfall locations which are discharging into unmanaged streams. Limerick City and County Council need to make the necessary representations and get these unmanaged streams under the management of OPW or look at increasing the detention time of the surface water gathered within the attenuation ponds. It is not acceptable to rip through the entire countryside and leave a devastation of land vulnerable to flooding in its wake.

The flooding of a watercourse would have a substantial impact on the flora and fauna which the river supports. Flooding of these unmanaged watercourses could result in the loss of life for many of

these fauna as they may not be able to make their way back to the streams or rivers once the water recedes.

Point 1 of the RFI relates to site visits of the proposed road network. It has been indicated in the further information submitted that 4 individual site visits were undertaken, and that "various site visits" took place between 2014 and 2015. As a landowner, I can confirm that no record of such walkovers was received as to engineers entering or proposing to enter our lands. Realistically, any site visit between 2014 and 2015 would have been related to a high level overview of the scheme with no real scientific knowledge gained. The further details of the walkovers are outlined below:

> *20th June 2016: Full site walkover at start of the design stage to plan the ground investigations along the selected route.*
>
> *29th and 30th August 2018: General site walkover which included review of watercourses and areas of soft ground to verify numerous matters of detail including provisions at watercourse crossings and connectivity for farming across the route where necessary.*
>
> *5th October 2018: Site walkover to investigate hydrogeology aspects, karst features etc. following desk studies including review of aerial photography and relevant GIS mapping*

The site walkovers outlined above, if undertaken, are less than satisfactory for a scheme of this nature. For example, the geotechnical engineer on the project should be carrying out quality control checks during the site investigation works at a minimum particularly at critical points along the route. Relying wholly on the site investigation logs from a contractor has a reasonable risk associated with same.

Also, if more than six site visits were undertaken, it should be quite easy to produce more than six photos for the preparation of the response to the RFI. This underlies once again the lack of local input and local knowledge inputted to the design of this proposal.

The public consultation process will be flagged as where the locals had an opportunity to engage with the design team. Having attended the public consultation day in Foynes Community Centre, it was clear from the outset that the views of locals were not important. Limerick City and County Council officials had merely interest in speaking with landowners only and had very little knowledge of the scheme itself. A lack of presence of the design team engaged on the scheme was disappointing.

The below statement is also quite alarming from Section 7.3.5 of the EIAR:

> *There was no evidence or records of Japanese Knotweed (Fallopia japonica) within the vicinity of the proposed road development.*

Japanese knotweed is quite evident within both the Foynes and Askeaton area. It should be clarified by Limerick City and County Council the exact number and timings of the ecological walkover surveys to ensure they were undertaken at the appropriate timing for when Japanese knotweed is in full flower. It seems quite surprising that over a 36km route through an area, according to the Biodiversity Ireland Mapping has a high concentration of this invasive species, that not a single plant has been identified.

It is paramount that Japanese Knotweed is identified as early as possible in the project so that suitable chemical of physical treatment can be applied. This is even more important in a project similar to this whereby borrow sites and massive earthwork volumes are to be transported. If not correctly identified and treated, it has the potential to be spread uniformly across the road project with the moving of materials. As a landowner, I would be extremely worried of the knock on effect of this possibly contaminating a complete section of land by essentially fertilising knotweed along the proposed route.

In conclusion, I fully agree with the idea that a solution is required to improve road connectivity between Foynes and Limerick. Any increase in freight through Foynes Port will also help the local economy.

However, I cannot support the proposal that has been presented by Limerick City and County Council for a number of reasons:

- HGV's will not use the proposed new route as it will not present any journey savings whilst requiring much larger fuel usages;
- The proposal has coupled two very different problems of congestion on the N69 and congestion on the N21 which can be adequately resolved with two independent simpler, more cost effective and environmentally friendly solutions;
- The basis for future vehicle movements on a publicly funded scheme has been obtained from a private companies report compiled in 2011 and published in 2013 with no independent review carried out on same;
- The EU TEN-T regulations are the corner stone which the inherent need for this road project has been built on. These same stipulations require a rail connection to Foynes Port to fulfil the requirements also, yet this has been completely ignored. Focus needs to be placed on expanding the rail links to companies who use Foynes Port daily and appropriate funding put in place to carry out these works. Moreover, these regulations are currently being reviewed and the outcome should be analysed before proceeding any further;
- The current economic conditions we find ourselves in presently namely BREXIT and the Covid-19 pandemic expose Foynes Port and SFPC indeed to colossal risk. The move away from Foynes Port largest imports such as oil, animal feedstuffs and chemical fertiliser will undoubtedly lead to a reduction in throughput in the Port. Any offshore wind energy creation opportunities by SFPC will not deputise for these HGV movements;
- A combination of improvement works to the N69, including the provision of overtaking lanes, removal of any acute bends (which should be carried out irrespectively by Limerick City and County Council) and the opening of a rail link would provide a much more appropriate solution;
- The entire cost-benefit analysis of the scheme needs to be recompleted with throughout only through Foynes Port included and with only the benefit of HGV's heading toward the South of the country using the proposed scheme between Foynes and Rathkeale;
- The issue of blasting during the construction phase needs significant revision. Consultation is required with affected residences, local quarries and farmers in the area. A substantial number of pre and post condition surveys will have to be undertaken, much greater than the 150m suggested within the EIAR;
- The need to thoroughly protect our archaeology throughout the scheme needs to be addressed. In particular within Limestone areas where vibrations could be much greater than those predicted could lead to our most valued culture and heritage being destroyed through the forceful application of deadlines by Limerick City and County Council;
- Rivers and streams identified to take discharges from the proposed attenuation ponds need to be taken over by the Office of Public Works (OPW). Failure to do this will result in flooding of lands upstream and a hugely negative effect on the fauna that these rivers and streams support;

- The issue of no Japanese Knotweed being identified along the entire scheme route is bizarre. Confirmation on the timing of the surveys is required and additional surveys need to be carried out to reinforce this statement. Identification of this invasive at a later date will be very worrying to landowners and local residents; and
- The overall environmental impact of the project will be colossal. Almost 1000 acres of land required, mass destruction of hedgerows, trees, wetlands and habitats, the need for 1.3 million m^3 of fill (approx.. 143,000 truckloads of fill), the creation of thousands of tonnes of carbon during the construction phase and the never ending use of the road by private cars emitting substantial amounts of greenhouse gases which will have devastating consequences. At the same time, the majority of HGV's will continue to use the existing N69 road.

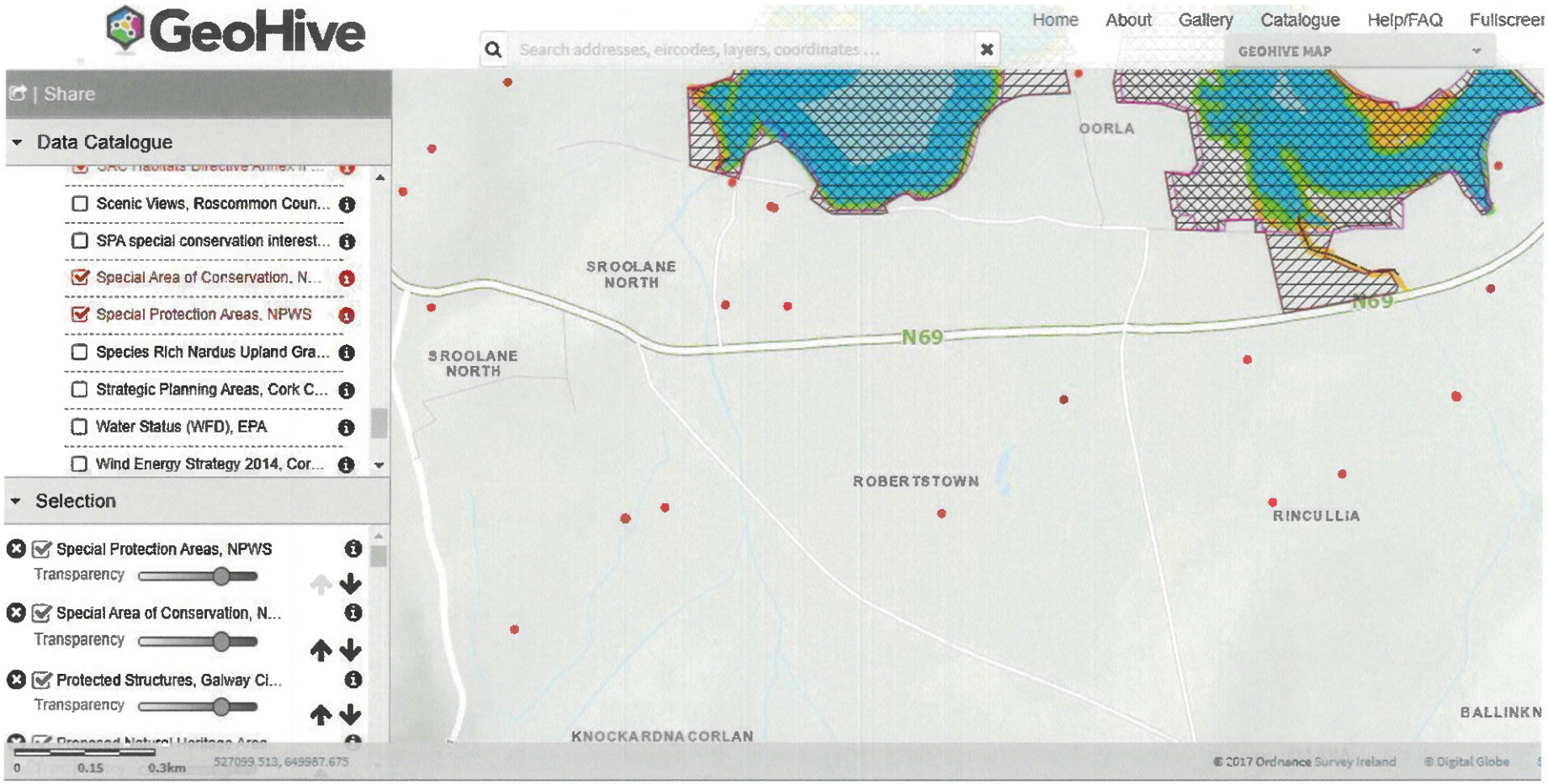
For the reasons outlined above, I believe An Bord Pleanála should reject the current application by Limerick City and County Council in its current form and require a more sustainable, environmentally friendly solution to be produced.

Mise le meas,

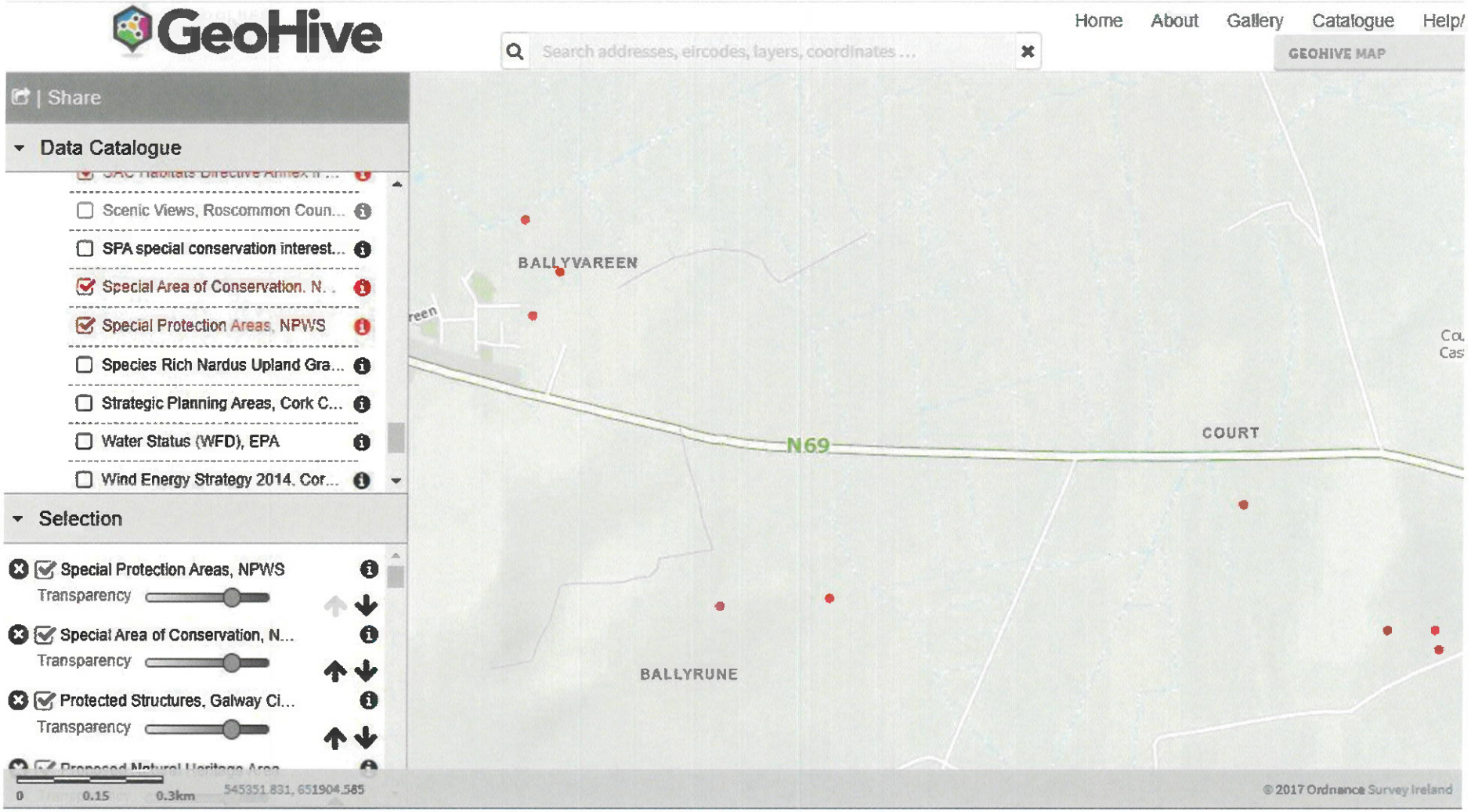
Conor Enright

APPENDIX A

1.0



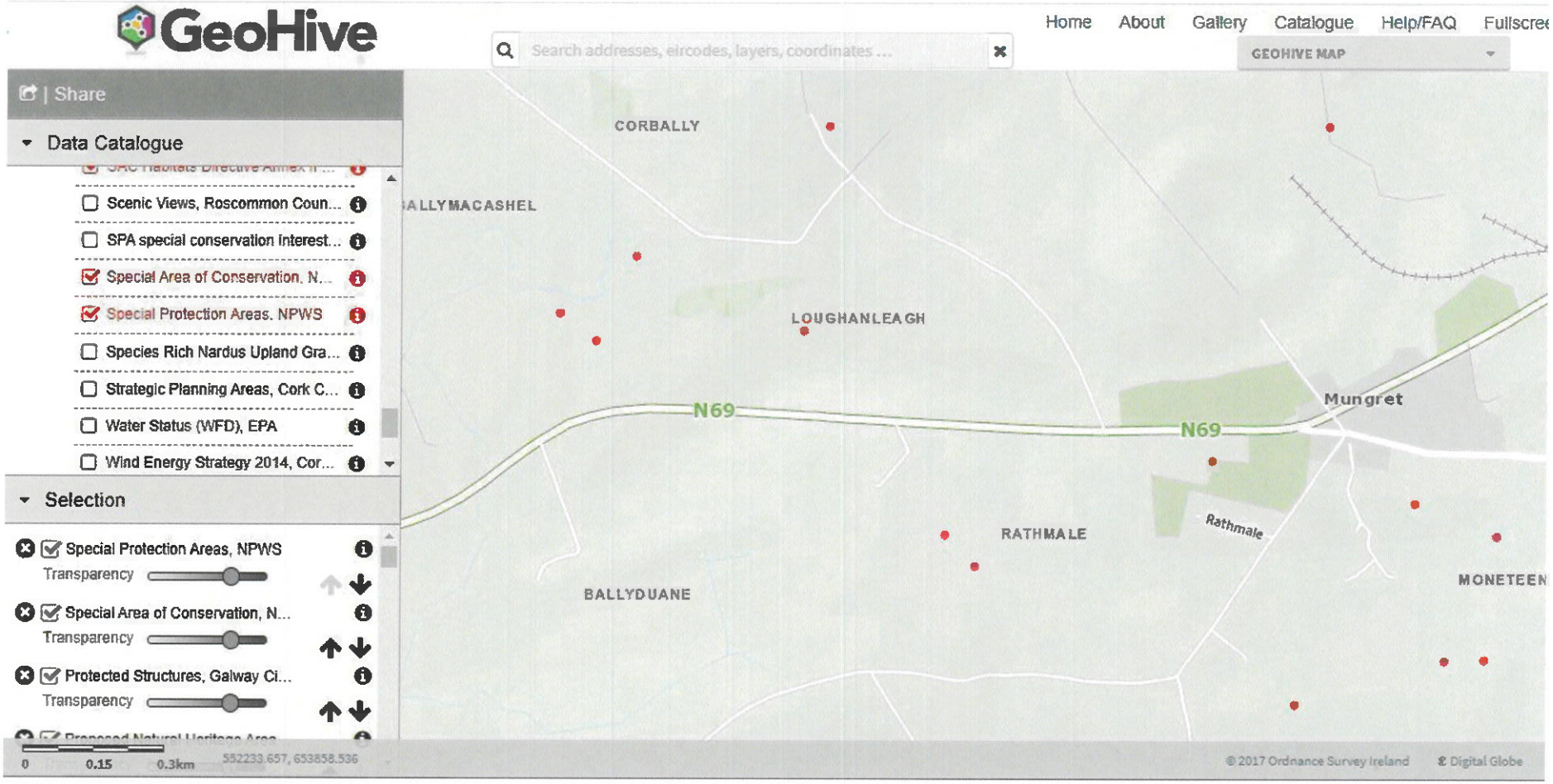
2.0


GeoHive
Home
About
Gallery
Catalogue
Help/
Search addresses, eircodes, layers, coordinates ...
GEOHIVE MAP
Share
Data Catalogue
Scenic Views, Roscommon Coun...
SPA special conservation interest...
Special Area of Conservation, N...
Special Protection Areas, NPWS
Species Rich Nardus Upland Gra...
Strategic Planning Areas, Cork C...
Water Status (WFD), EPA
Wind Energy Strategy 2014, Cor...
Selection
Special Protection Areas, NPWS
Transparency
Special Area of Conservation, N...
Transparency
Protected Structures, Galway Cl...
Transparency
BALLYVAREEN
N69
COURT
BALLYRUNE
0
0.15
0.3km
545351.831, 651904.585
© 2017 Ordnance Survey Ireland

3.0


GeoHive
Home
About
Gallery
Catalogue
Help/I
Search addresses, eircodes, layers, coordinates ...
GEOHIVE MAP
| Share
Data Catalogue
Scenic Views, Roscommon Coun...
SPA special conservation interest...
Special Area of Conservation, N...
Special Protection Areas, NPWS
Species Rich Nardus Upland Gra...
Strategic Planning Areas, Cork C...
Water Status (WFD), EPA
Wind Energy Strategy 2014, Cor...
Selection
Special Protection Areas, NPWS
Transparency
Special Area of Conservation, N...
Transparency
Protected Structures, Galway Cl...
Transparency
CLOGHATACKA
N69
CRAGBEG
Castle
CLOGHATACKA
N69
0
0.15
0.3km
548999.120, 652092.439
© 2017 Ordnance Survey Ireland

4.0


GeoHive
Home
About
Gallery
Catalogue
Help/FAQ
Fullscree
Search addresses, eircodes, layers, coordinates ...
GEOHIVE MAP
Share
Data Catalogue
Scenic Views, Roscommon Coun...
SPA special conservation interest...
Special Area of Conservation, N...
Special Protection Areas, NPWS
Species Rich Nardus Upland Gra...
Strategic Planning Areas, Cork C...
Water Status (WFD), EPA
Wind Energy Strategy 2014, Cor...
Selection
Special Protection Areas, NPWS
Transparency
Special Area of Conservation, N...
Transparency
Protected Structures, Galway Ci...
Transparency
0
0.15
0.3km
552233.657, 653858.536
CORBALLY
LOUGHANLEAGH
N69
N69
Mungret
RATHMALE
Rathmale
BALLYDUANE
MONETEEN
© 2017 Ordnance Survey Ireland
© Digital Globe