

Mary Brosnan
Clonshire
Adare
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 Madam,

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.

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.

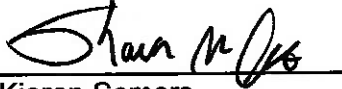
If you have any queries in relation to this matter please contact the undersigned officer of the Board.

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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	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

HA03A

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LOG-033328-201

AN BORD PLEANÁLA	
LDG- _____	
ABP- _____	
02 DEC 2020	
Fee: € _____	Type: _____
Time: _____	By: <u>Post</u>

MaryBrosnan,
Clonshire,
Adare,
County Limerick.

28.11.2020

Mr Kieran Somers
Executive Officer
An Bord Pleanála
64 Marlborough Street
Dublin 1

**SUBMISSION RE: FOYNES TO LIMERICK ROAD (INCLUDING ADARE
BYPASS) FURTHER INFORMATION REQUEST REF: ABP-306146-19**

Dear Sir,

Thank you for the opportunity to make the following submission on the referred document and covering letter from Limerick City & County Council dated 30.09.2020.

LCCC Letter Para 3:

The provision of a high quality road to serve the Tier 1 Port of Foynes is a key priority, not just for Limerick City and County Council, but also for the entire Region and Country and is an objective and obligation under the TEN-T (Trans European Transport Network - Transport) Core Network.

Response:

N69 has been for some time the designated Ten-T route to Foynes from Limerick.

N21 in its entirety from Limerick to the Kerry border is the main arterial Ten-T route in County Limerick as it links over 90% of the Kerry population to most of the remainder of Ireland.

LCCC letter paragraph 4:

Furthermore, the proposed development provides for a single combined 35Km long route comprising part of both the TENT Core and Comprehensive networks, compared to two separate routes having an aggregate length of approximately 57km.

Response:

N69 will still have to be improved and maintained as it will retain current National route status but with less LGV traffic.

LCCC letter page 2:

- provides safer road connections along the routes from Limerick to Kerry and to Shannon-Foynes Port with corresponding reductions in fatalities and serious life altering injuries;

Response:

Only 17 km of new road will serve Kerry which will run alongside much of the improved route put in place already to bypass Croagh, Rathkeake and Reens Pike.

LCCC letter page 2:

improves journey amenity for regional traffic and all modes of local traffic including cycling and walking through reduced traffic volumes, particularly HGV's, on existing roads.

Response:

This statement demonstrates a complete misunderstanding of present traffic patterns in the area.

Many motorists will currently choose the N69 rather than N21 for that portion of their journey from Limerick City to North, Mid and West Kerry other than at very low traffic times as it is a more efficient route and arrival time is assured.

The applicant has not demonstrated any improvement in journey time from Foynes to Limerick as they do not exist on the much longer, higher speed route proposed.

Likewise there will be no improvement in Journey times to the Kerry border due to the Newcastlewest and Abbeyfeale choke points on the N21.

Thus the N69 will become even more attractive for car traffic if Foynes bound LGV's do indeed use the N21 instead.

This increase in car traffic on N69 will then see LCCC introduce traffic stifling measures on the N69 under the guise of "Traffic Calming " to make it very inefficient and thus unattractive to transit traffic.

This is a hugely important arterial route for the region as already pointed out by LCCC and destroying its efficiency in order to make the proposed route more attractive is indescribable.

For example there are 2nd level schools only in Limerick, Pallaskey and Askeaton along the N69 Limerick portion. Similarly employers are well dispersed but Limerick remains the main center for commerce, healthcare, 3rd level education and so on.

Any reductions in its efficiency will adversely effect the provision of public transport and general and economic viability of that region.

In fact the N69 will always require to be improved and well maintained in the future in order to serve its communities fairly contrary to all indications in the application.

LCCC FI.

Policy Objectives for Transport & Climate Change

0.5 There will be two major benefits of the proposed development: a) To relieve existing severe traffic congestion and delay on the N21 route at Adare

Submission.

This is a hugely expensive proposal to alleviate Adare peak time only congestion which certainly needs resolving.

The proposed route merely shifts the most of the current congestion and future increases onto Newcastlewest and Abbeyfeale bottlenecks.

How can they abandon on all consideration for the N21 beyond Rathkeale which is the main TEN-T route in their jurisdiction and a critical artery to the South West.

Their covering letter mentions a brief golf competition as a major driver.

LCCC 0.6

Improved roads will assist this process by increasing the efficiency of each trip, which will add to interim reductions in emissions during the transition period to a fully electric fleet.

Submission.

No evidence has ever been provided to support such a generalisation on this route.

There will be no improvement in journey times from Foynes to Limerick. The journey times will be similar by achieving higher speeds on the much longer route thus no energy savings can be claimed.

LCCC

0.7 The proposed road will deliver two elements of the EU Trans-European Network - Transport (TEN-T) in County Limerick for

- the Core Network Route to Shannon-Foynes Port, and
- the Comprehensive Network Route from Attyflin, east of Adare, to Rathkeale.

Submission.

N69 is already designated as the Ten-T route to Foynes. Removal of trucks will still require its improvements and maintenance to continue into the future to support local businesses, workers and people.

More importantly the main Ten-T artery in the Limerick county is the N21.

The current proposal not only abandons this critical artery to the South West at Rathkeale but will cause the current congestion in Newcastlewest to deteriorate significantly and equally adding to the current problems in Abbeyfeale.

LCCC 0.8

2. To improve the route between Limerick and towns in the south-western region through the bypassing of Adare.

Submission.

The proposal only improves the journey time to Rathkeake and environs as the complete bottlenecks on the N21 in Limerick Councils own jurisdictions of Newcastlewest and Abbeyfeale will further deteriorate due to the faster feed of traffic into them.

LCCC 0.9

3. To facilitate a road link between Tralee and Limerick City, including a bypass of Adare

Submission.

The applicant repeats the same claim again and again while ignoring the current reality on the ground.

As this application has completely abandoned all consideration for the N21 from Rathkeale to the Kerry border they should be embarrassed as road planners to make such claim.

They are merely accelerating the traffic around Adare so it will arrive into the Newcastlewest and Abbeyfeale congestion bottleneck at a much higher rate.

There can be no claim of improvement of the journey to Tralee until the three choke points of Adare, Newcastlewest and Abbeyfeale are considered simultaneously in a joined up plan.

LCCC 0.10

3. To improve local journey times

Submission.

Note that in 0.9 3 above the applicant does not mention improved journey times to Tralee as they don't exist.

LCCC.

0.13 In the response to Item 11 for Climate, the resultant savings in embedded carbon from the shorter route are described.

Submission.

The suggested route is much longer than or of equal length in some limited parts to the existing route.

No journey in any part of this route whatsoever will be shorter and any claims based on shorter routes are false.

LCCC 0.20

4. Improved general amenity due to transfer of major traffic flows from the local communities of Adare and Croagh on the existing N21 route, and to a lesser extent for the various communities along the existing N69 route.

Submission.

Croagh is already bypassed and the proposed route will mean CROAGH becomes an island between two bypasses.

LCCC 0.20

5. Reduced exposure of population to noise and air pollution within the local communities along the existing roads.

Submission.

This is a direct contradiction of the EIS report which states that the blue route 2 would have a lower noise impact than the selected orange route 3.

But then it goes on to state that the more densely populated orange route has a much higher base noise level at the moment due to its proximity to the N21 and rather than scoring a route for overall noise impact they would instead only consider increased noise above current base levels to choose the winning route.

This flawed process was the fundamental reason the orange route was selected.

LCCC.

Noise and Visual Impacts

0.21 Noise barriers and screen planting will minimise adverse effects for the residents of houses within the vicinity of the proposed new roads.

Submission.

No consideration was given to noise impact at design stage.

When the proposed road design was complete a noise impact exercise was carried out and minimum mitigation including flimsy barriers were added in as afterthoughts.

The original impact assessment has no evidence that noise pollution was evaluated at the very high elevations of many sections of the of the proposed route.

LCCC.

11.15 The Route Selection process aimed to achieve the most efficient form of the proposed road development, that would result in a reduction of the carbon impact of the development through a lower quantity of materials being required. This can be seen under the heading of Efficiency and Effectiveness, where Route Option 3 (which emerged to form the preferred route corridor) was found as being preferred compared to Route Option 1.

Submission.

Blue Option 2 was the superior one in this context as it ran alongside a railway line which always has natural properties of being straight and level thus requiring the least amount of material movement.

Orange route 3 diverts south after Adare over undulating hills to later parallel closely the N21 and Contains Ballycannon (Ch.52+550 to Ch.55+500, Section D), one of the largest rock cuttings on the whole route.

Likewise vehicles will use far more energy traversing the undulating countryside of the finished orange route 3 than they would on blue route 2.

Railway lines unlike large roads do not attract housing and thus blue route 2 has a much lower population density than orange route 3.

Likewise LCCC item 11.16 accepts that although Blue option 2 required less material movement Orange option 3 was still selected under this metric indicating the consistent but inexplicable bias toward choosing Orange route 2 option for the final proposal.

In summary the applicant must plan a complete solution for the whole N21 TEN-T route in their area of responsibility.

When a complete long term viable and efficient plan in accordance with all policies and best practice for their area is approved then and only then should any expenditure be allowed.

This hugely expensive piecemeal approach under review is wholly inappropriate and one needs to step back a little from some of the technical details and view the proposal in the overall context where it holds little or no merit.

I thank you and the process for the time and opportunity to make this submission.

Yours faithfully



Mary Brosnan.

