



Simon White and Others
Nantenan
Askeaton
Co. Limerick
V94W5D6

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 / 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.

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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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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LDG-0333 27-20.

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RE Case Number ABP-306146-19

In reference to your letter dated 23rd October 2020,

To Mr Kieran Somers , Executive officer representing an Bord Pleanala (the Board)
64 Malborough Street, Dublin 1

From Mr Simon White and Others
28th November 2020

Dear Mr Somers,

I refer to the covering letter and further information submitted by the applicant, Limerick City and County Council, for planning for the Foynes to Limerick road in response to the letter dated 15th July issued by Mr Kieran Somers of An Bord Pleanala to Mr Tim Fitzgerald representing requesting further information. Please accept this as a submission by myself on behalf of the group of concerned people I represent for whom I made an initial submission.

In reference to the introduction of the further information:

The Proposed Road Development .

0.4 *The proposed Foynes to Limerick Road (including Adare Bypass) will provide 35km of new high-quality road to replace 57km of existing roads on parts of both the N21 Limerick to Tralee route, and the N69 Limerick to Foynes Port route, in a combined scheme.*

- This new road does not replace road . The existing roads will remain and this is a proposal to build new roadway with 17.5Km of motorway , 9.5 Km of which runs parallel to existing road of good standard, and a further .

Policy Objectives for Transport & Climate Change.

0.5 and 0.6 *claim two benefits of the proposed road development. a) To relieve existing severe traffic congestion and delay on the N21 route at Adare, and b) To support the development of the strategic national Shannon-Foynes Port as a major economic facility for the mid-west and south-west regions of Ireland. They also claim to achieve Climate action plan objectives in some way by assisting 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. The improved roads will continue to support more efficient transportation in terms of journey times for many decades beyond the point where the internal combustion engine has become an historical relic. 0.8 claims to support national policy objectives 1. To support the Tier 1 status of Shannon-Foynes Port and to provide efficient and effective transport links to the national road network at Limerick, and 2. To improve the route between Limerick and towns in the south-western region through the bypassing of Adare.*

- A large proportion of this new road will be motorway. This is the most expensive option in both cost of construction including the amount of land take and in terms of environmental impact. In this case is totally unjustified and in our opinion demonstrated poor prioritizing in the regional and national planning exercised by the local planning authority.

AN BORD PLEANÁLA	
LDG- _____	
ABP- _____	
01 DEC 2020	
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- The most telling information is in the Environmental impact assessment. In the section on traffic analysis the traffic survey results give a clear indication of present traffic and where it is generated and where it travels to. This is shown in annual average daily traffic volume (AADT). The traffic generated in Foynes that travels to and from Limerick is only 8,500. It gets added to in Askeaton by 4,811 but 2,700 goes to and from Askeaton and Rathkeale where a percentage comes and goes South and the rest comes and goes to and from Adare and Limerick. 10,600 AADT is what travels to and from between Limerick and Askeaton and closer to Limerick the volume increases to 13,650. Because there are 4,300 AADT between Foynes and the west it has to be considered that some of the traffic between Askeaton and Foynes is travelling through Foynes and is generated further west. This indicates the true extent of the transport needs generated by Foynes Port under the SFPC.

The projections carried out for 2024 when the proposed development is completed is that the New single carriageway road from Foynes to Askeaton will take 78% of the traffic off that parallel stretch of the N69. However this serves absolutely no benefit to anyone. But, and this is the crux of the matter it predicts that between 18% and 40% of the traffic to and from Between Askeaton and the Dock Rd in Limerick will be diverted onto this new road. This indicates that between 60% and 82% of the traffic will continue to use the N69. Should the applicants lower figure of traffic diverting from the N69 in Askeaton to Rathkeale of 18% prove the more accurate figure the development between Foynes and Rathkeale will prove to be a very ill-conceived idea from the outset. Again the additional traffic added to the N21 in Rathkeale travelling to and from Limerick is likely to be absolutely minimal. According to present day traffic there is definitely no justification for building this new road. A fraction of the investment would be better spent upgrading the existing road network, which would improve road safety. Significant upgrading of the N69 has already taken place since this project was submitted to the board.

- The predictions of increased traffic, referred to in the further information, are all based on the predictions of growth in Industrial growth and increased freight shipping through Foynes port which Shannon Foynes Port Company's Vision 2041 claims to be in the pipeline. Is it not important to investigate the level of realism in this very ambitious plan? Surely there needs to be evidence of concrete commitment to elements in this plan by investors? The type of businesses they wish to entice into the area depend upon so many factors and many vital criteria do not exist. The very optimistic growth in volume of freight is unsafe to accept can happen, let alone will happen. Take the predictions that container traffic will increase from 90 to 265 HGV AADT volume and Biomass will increase from 60 to 270 HGV AADT by 2039. In both cases the increase in predicted business is threefold. There is no evidence to suggest a significant shift in container traffic from the main Irish Ports which traditionally handle such freight, and yet the justification for this road is based on this type of unsupported claims. Biomass produced in Ireland will not be processed or exported in significant volumes from Foynes Port. A brief review of the Miscanthus disaster in the last ten years explains why. The only possible increase in biomass through Foynes port will be through importation of biomass in the form of Olive stone and the like to process into fuel. This type of operation causes a direct increase in our national carbon footprint and as such is against everything the CAP is set out to achieve. Promises are no good. Foynes has a long history of promised business developments that, when it came to the crunch, the prospective investors decided against. Since this road development plan was submitted to an Bord Pleanála a very poorly conceived Combined Heat and power gasification plant at Gortadroma, near Foynes, to be built by Cadence Enviro Power (CEP), was abandoned in July 2020. More recently in November 2020 the high court quashed the plans by Shannon LNG in Tarbert for a Liquid gas facility. This was also shown

to be an ill-conceived development. There is very little evidence supplied by the LCCC to support significant investment in the Lower Shannon Estuary, indeed, as referred to above, operations that were publicized as having such huge potential in the area have all but disappeared.

- The location of the alumina Refinery beside Foynes port is, and will be, a major disincentive to any prospective operation considering development in the area for many decades to come. A 228 acre, fully serviced, industrially zoned development site exists between Askeaton and Foynes. Since the 1980s the IDA has attempted to attract an industrial operator to start up there. Following their failure Shannon development took it over with the same aim. No matter what incentives were given, over the last 30 years, and more, both the IDA and Shannon development failed to attract any industrial operation to come in. Now, again since this road application was submitted to ABP, the regional industrial promotion agencies have accepted the reality of the impossibility of their task and have put the site up for sale.

The Shannon Estuary is suffering from the previous planning decisions to attract “dirty industry” into the region. The knock-on effect of this has been to make the area extremely unattractive to clean operations. Due to the accumulated polluting effects of the existing “dirty Industries” local residents are not prepared to take any more health risks and mount strong protest against any new perceived risks. These objections to the authorities are generally successful. The limited clean water supply in the area is another major factor in decisions not to locate in the area.

- The Depth of the river Shannon shipping channel between Moneypoint and Tarbert poses a question as to whether Foynes is a deep water port as it is regularly portrayed at all. SFPC claims in its literature, referred to in the further information, that Foynes port is able to accommodate vessels of 17.5 m draft. This is a misrepresentation of the port’s capabilities. Foynes port itself, handling freight and bulk cargo, can only accommodate vessels of 10.8 m draft. Whilst it is true that Tarbert Aughinish and Moneypoint, under the auspices of the Shannon Foynes Port Company (SFPC) can accommodate vessels with greater draft, with the exception of Tarbert, which is purely a liquid handling facility, no significant tonnage of the cargo unloaded or loaded at these deeper jetties will ever be transported on the Foynes to Limerick road network. Bulk from these deeper berths could possibly be transported by rail, but for that to be possible, there would need to be major rail upgrade to these outlying jetties.

- Contrary to the suggestion by the applicants there is no evidence that this road development will have any impact on the transition to an electric fleet.
- In support of their flawed route choice the applicants’ Environmental Impact assessment Traffic analysis compares the predictions of the usage of the new road against the scenario of “do nothing”. It should have compared the new road predictions with predictions of properly planned upgrades of the N69, and parts of the R518.

- There is an existing shorter route from Foynes to Limerick along the N69. The supposed improvement in journey time claimed by the applicants will only apply to a small proportion of those using the existing road network. The majority of road users will continue to use the N69 subsequent to when, and if, this development were allowed go ahead. (The majority being somewhere between 82% and 60% using the applicants own predictions).
 - The claim of reduced journey time only refers to traffic from certain starting points. Local journeys by local road users will not change because they will have to use the existing roads . The planned design restricts access to this new road to very limited access points in many cases increasing journey length and time.
- At present the applicants claim at most 3.7% of traffic volume passing through the existing towns of Adare is HGV and 5.3% of traffic through Mungret is HGV. The actual model shift this new road can possibly divert is relatively minor, which indicates the applicants' claimed reduction in greenhouse gas emission to be grossly overestimated.
- The tier 1 status of Foynes is a false representation of the importance of Foynes port in relation to all the other the ports of Ireland. A significant claim for the need to build this road is based on the perceived need to retain this status. In fact, it is possible to achieve the road link element needed to retain Foynes port's status by upgrading of the N69. Actually, the reasons for which the applicants rejected this alternative would be resolved in the upgrading process of the N69. It the shortest route between Foynes port and Limerick City. The safety issues on the route are already being addressed. The resultant extra cost in energy transporting goods on the extended route of Adare versus the N69 represents significant extra cost for the haulage businesses and resultant higher CO₂ emissions.
 - In order to retain the Tier 1 status , which the SFPC claims, and the applicants support, is of such strategic importance, entails the upgrading of the Railway line from Limerick to Foynes. So there are two separate developments, which both entail vast capital investment before this aim can be achieved.
 - There is another factor that also needs to be considered. The Tier 1 status is based upon the tonnage attributed to SFPC. However, the vast majority of this bulk material is unloaded into Aughinish Island and into Moneypoint power station.
 - There is a serious effort under the climate action plan (CAP) to move away from generating electricity from coal. If Moneypoint closes down the tonnage lost to SFPC would be significant and it would lose its Tier 1 status The same would be the case, only more so if, and when, the alumina refinery reaches end of life, which it may well do sooner rather than later. If either were to happen retaining the tier 1 status would become immaterial.
- The development of the railway upgrade depends upon a different process, which the applicants of the new road development cannot influence significantly. The main determining factor will be availability of funding and that will be determined by weighing up the economic benefits against cost and we contend that the needs of business, generated in Foynes port, for betterment of the road transportation system will not, and cannot, justify such expenditure in the foreseeable future.
- The original plan in 2010 for bypassing Adare was turned down by ABP and a major reason cited was the withdrawal of the Council's proposal to upgrade the M20 , which left the road proposed isolated with no junction to the main road network. The upgrading of the M20 is at present again being designed by LCCC planning authority. The link, as planned previously, is eminently possible to provide. This, and other points on which that proposal was refused, were possible to resolve with relatively minor adjustments to the planned route. But instead of looking at this again the Council planning office decided to go about the bypassing of Adare by integrating it into a totally

separate idea and came up with a very imaginative stitching together of two completely separate road projects into one incredibly expensive development. This convoluted plan achieves minimal overall objectives compared to what could be achieved if the same monies were devoted to proper strategic planning.

- Under the South Western Region National Secondary Roads needs study options report NRA 2011 the towns of the N21 needs to be upgraded in order to provide links for the towns in the South Western Region. Congestion removal is a major target. Linking Foynes Port to the N21 at Rathkeale where there already is a road link should not override the priority to upgrade the N21.
- In the covering letter the applicants refer to the need to bypass Adare and cite the Ryder cup in 2027. The ryder cup has already been decided, bypass or no bypass. The bypassing Adare by dual carriageway, as was originally proposed having been considered the best option after years of wrangling in 2010 by the applicants, would be no less beneficial than the proposed development only that the latter will cost a significant number of millions of Euro more, and will mean bridging the Maigue through an area designated an SPA.
 - Once Adare is bypassed the obvious outcome will be, as was seen before on the route from Dublin to Limerick, the congestion will be shifted along the route to Newcastlewest and Abbeyfeale. The only road users of the N21 to benefit from this bypass of Adare will be those who join the N21 from junctions between Reen's pike into Adare. All traffic coming from and going to west of this junction will be held up in far worse congestion in the towns of Newcastlewest and Abbeyfeale. The tailbacks predicted are in the same bracket as takes place in Adare at present.
 - The importance of the transport link between Limerick and the south west, Tralee and Killarney far outweighs the importance of the minor traffic that Foynes port generates.
- In the FI response to concern over drinking water extracted at Askeaton and Boragone there are issues in both the construction phase and the finished phase that have very sketchy information supplied as to how possible contaminatory effects are to be mitigated.
 - A number of times each year the Deel river floods over a significant catchment area through which this road will be constructed. The proposed catchment ponds will be submerged when this happens, and the construction site will also find itself under water at these times too. There are no clear indications of how this is to be dealt with.
 - Allied to this is the concern of Biodiversity alluded to, in further information supplied, as if the only species worthy of consideration are sea lamprey and Salmonoid fish. In the early walk over studies, where it is noted by admission, that the notes taken were not stored as should have been standard practice. The surveyors were informed that it had been recorded that fresh water mussels, fresh water crayfish and common newts were found in a survey dated 2003 carried out by a student in the University of Limerick. The locations the Fresh water mussels *Margaritifera margaritifera* and white clawed fresh water crayfish *Austropotamobius pallipes* were identified in the Deel just upstream of where the new road will cross over by new bridge and the smooth newt *Lissotriton vulgaris* was recorded in the townlands of Nantenan and Feeagh where the new road proposes to traverse. This information apart from the Fresh water mussels, which were never mentioned, was confirmed in surveys the applicants had carried out.
 - The environmental impact on these species by the road construction and road division of habitat is considered negative and yet this is dismissed as having little overall impact on the species in general. These are all protected species, Fresh

water mussels and White clawed crayfish being endangered species. There is need for a greater effort to mitigate these negative impacts.

- The whole question of the impact on Agriculture are mostly ignored.
 - 0.22 *Impacts for agriculture have been largely reduced through the alignment of the route along or close to property boundaries as much as possible. Farm severance will be mitigated through the provision of 20 dedicated farm underpasses along the route with an additional 4 farm underpasses provided under river bridges and 3 as overbridges.*
 - The impact on Agriculture will be highly significant. This development proposes taking land over distances of 9.0km of motorway that is unnecessary because it duplicates a good road. It proposes to take a further 6.5Km of motorway that could supply the needs to bypass Adare by dual carriageway just as efficiently. The proposal is then to take land for 15.6 km of dual carriageway to build a totally new road over farmland , which for most farmers and residents living along its route will not have access to close t where they live.
 - The impacts on agriculture in the region will be substantial. The impacts the designers say they will mitigate, such as access to land cut off etc, does not address the cost to the agricultural sector in the area at all. This road will take 323.4 hectares of land. Much of this land will from the best quality of land in the County in many places along its route. Although it is admitted that this will be highly significant to some farmers along the route the applicants deem this Land-take is not significant nationally nor on a County basis. Farmers accept that land has to be taken from them in order to build vital infrastructure. However, it must always be done in a way that reduces land take to the minimum. This design of this proposed road development ignores this principle. The unnecessary extra land take of productive land will be an enormous loss to the farming community. Many of these farms are highly productive. Viable family farm units at present will be rendered unviable. The farming community is in danger of being compelled to accept enormous cost and upset to their way of life and their livelihood for something that is not actually going to benefit the wider community that much at all. There is a very legitimate question as to why the farming community should be the sacrificial lamb to schemes that are called progress in the absence of proof that they are. This proposed road plan is another example of how the local planning authority consider the contribution to society, in general, by farming ,to be insignificant. If, as claimed in the further information submitted, transport by road is going to reduce over the next 40 years, why are the planners advocating building roads over land that can never be converted back to productive land again?
- We would refer to the noise pollution this road will create especially along its elevated sections. The mitigation involving screens , which in turn have huge aesthetic implications blocking views etc. taking into consideration that we contend large sections of the Motorway are unnecessary and the proposed protected Road from Rathkeale to Foynes is unnecessary a large number of local residents would suffer issues such as noise pollution unnecessarily if the project is allowed go ahead.
- Should the bord decide to grant permission for this development to go ahead, which we sincerely hope will not be the case, the issue of removal of rock and the quarrying of rock in certain areas in order to elevate other areas of the route raises the question of potential damage to privately

owned structures from this vibration and shock waves in this rock removal. All structures, houses, Farm buildings , Bridges and most especially listed structures etc must be surveyed by an engineer and base line reports given to owners prior to the start of the road construction phase. The distance from the potential risk operations will need to correspond to the distance such damage by shockwaves has been known to travel in Sedimentary limestone bedrock, and all efforts must be made to ensure that this distance plus extra for safety must be enforced to safeguard existing private property. This is not confined to property owners within the land take. The cost of these reports must be born by the applicants.

Thank you for allowing us to submit this. We do refer to information contained in the original application. However, the applicants referred to the same in the further information they supplied , which entailed the need for us to address these points raised.

We respectfully request that the board consider this proposed road development in conjunction with the overall needs of the road network in the region and reject it suggesting that the local planning authority review the needs of the county's roads on a cost benefit analysis basis.

Yours Sincerely

Simon White

A handwritten signature in black ink, appearing to read 'Simon White', with a long horizontal flourish extending to the right.A thick, black horizontal redaction bar covering a line of text.

