

An Taisce
Tailors' Hall
Back Lane
Dublin 8

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.

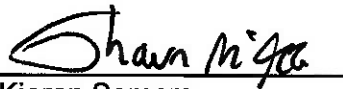
If you have any queries in relation to this matter please contact the undersigned officer of the Board.

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

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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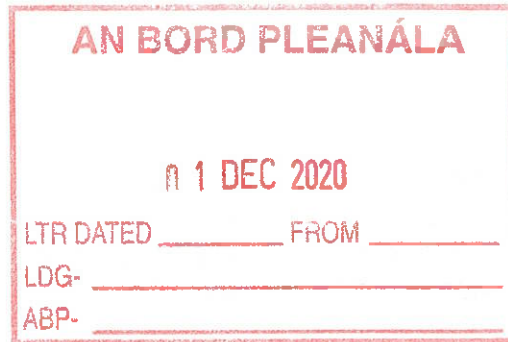
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LDG-033325-20-

20201201-ABP-306146

An Bord Pleanála
Strategic Infrastructure Development Section
64 Marlborough Street
Dublin 1



Sent by email to: bord@pleanala.ie

1st December 2020

Ref. 306146: FOYNES TO LIMERICK ROAD, FURTHER INFORMATION

To Whom It May Concern,

An Taisce wishes to make the following submission on the further information response for the above application.

1. Justification for the Proposal

It is submitted that the further information response has failed to justify the need for the project.

The majority of the bulk tonnage coming in through Foynes Port will be rendered obsolete when sustainable energy and resource use provisions are properly applied to address the climate and biodiversity emergency and Ireland's insecure food economy. This will mean the rapid ending of the current imports of oil, coal, biomass, animal feed, and fertiliser and the export of waste. Accomplishing the above would either eliminate or reduce current cargos coming through Foynes, thereby removing the justification its TEN-T Tier 1 status and the need for the current Foynes-Limerick road scheme. Not only is there no justifiable need to increase port capacity at Foynes, but the majority of existing port traffic has no sustainable future.

The further information submission has not addressed this.

2. Traffic Generation

It is submitted that the further information response has also failed to address the overarching need to reduce car use and dependence.

In FI response Section 12, the applicant discusses the compatibility of the proposal with the Climate Action Plan (CAP) as well as other climate policies such as the proposed Climate Action and (Amendment) Bill 2019. The applicant contends that proposed shifts to electric vehicles justify the continuation of road projects such as the subject proposal and states that:

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An Taisce – The National Trust for Ireland | *Protecting Ireland's heritage, safeguarding its future*

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Directors: Philip Kearney (Chair), Trish O'Connell (Vice-Chair),
Stuart McCaul (Secretary), Alison Hough, Aoife O'Gorman, Hugh O'Reilly, Olivia Rogers, John Sweeney

“Thus, the reduction in the transport sector of 45-50% in the CAP is framed in the context of a very significant increase in the uptake of EVs over the period 2020 – 2030. There is no indication of a policy to reduce road construction nor to reduce road transport in general. Rather, by ensuring that all cars will be electric by 2045 at the latest and that the electricity grid will have at least 70% renewables by 2030 and net zero emissions by 2050, the sought after reduction in the transport sector will be obtained from technology shifts rather than a policy to reduce mobility and car ownership.”

We would highlight that the Climate Action Plan is not statutory and that the Draft General Scheme of the Climate Action (Amendment) Bill is still undergoing pre-legislative scrutiny. Therefore, justifying the proposal on proposed electric vehicle targets in these policies is premature.

Furthermore, even if such a switch to electric vehicles does occur, this does not address congestion, noise pollution, and other forms of car-generated pollution, including micro-plastics released through tyre wear¹.

Additionally, sections 12.17-12.22 of the further information response state that the project will contribute to creating a modal shift in transport by *“removing congestion and a proportion of the through traffic from towns and villages along the N21 and N69”*. While some traffic may indeed be diverted from town centres, this again does not address the overarching need to reduce car use overall, which is fundamental to creating a modal shift and reducing downstream traffic congestion in and around Limerick City.

Please acknowledge our submission and inform us of any further consultation periods and of any decision made.

Yours sincerely,

Phoebe Duvall
*Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland*

¹ International Union for Conservation of Nature (2017) “Primary microplastics in the oceans”:
<https://portals.iucn.org/library/node/46622>