An Bord Pleanála Oral Hearing

Córas lompair Éireann/larnród Éireann

Dublin to Cork Railway Line Level Crossings

Brief of Evidence

Traffic and Transport

Colin Wyllie

1. QUALIFICATIONS AND ROLE IN THE PROPOSED PROJECT

- My name is Colin Wyllie. I am an Associate Director in Jacobs Transport Planning team. I hold a BEng Honours degree in Civil and Transportation Engineering from Napier University. I am an accredited Road Safety Auditor and a member of the Society of Road Safety Auditors (SoRSA).
- In accordance with Section 39(1)(a) of the Transport (Railway Infrastructure) Act 2001 as amended and substituted (including by SI 743 of 2021), I confirm that I have over twenty three years' experience as a transport planner where I have prepared and project managed the input to numerous Transport Assessments and Environmental Impact Assessments for developments in the UK and Ireland.
- I have managed the procurement of traffic surveys and prepared traffic and transport chapters of Environmental Impact Assessment Reports (EIARs) for a range of projects which involved assessing the construction and operational traffic impact generation for private sector clients and energy suppliers. Together with the other Assessments which comprise the Environmental Impact Assessment Report, this Statement reflects the assessment prepared in Chapter 11 (Traffic and Transport) which comprises part of the assessments which comprise the environmental impact assessment report for this Railway Order Application and which inter alia contains:-
 - A description of the proposed railway works comprising information on the site, design, size and other relevant features of the proposed works;
 - (ii) A description of the likely significant effects of the proposed railway works on the environment;
 - (iii) The data required to identify and assess the main effects which the proposed railway works are likely to have on the environment;
 - (iv) A description of any features of the proposed railway works, and of any measures envisaged to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
 - (v) A description of the reasonable alternatives studied by CIÉ which are relevant to the proposed railway works and their specific characteristics and an indication of the main reasons for the option chosen, taking into account the effects of the railway works on the environment; and
 - (vi) A summary in non-technical language of the above information.
- I have been involved in the Project since 2019 and have advised larnród Éireann on the traffic and transport constraints. My involvement was in the preparation of the traffic and transport Chapter (chapter 11) in Volume 3 Part A of the EIAR which was submitted to An Bord Pleanála in April 2021. This included the procurement and management of sub-consultant traffic surveys.

2. OVERVIEW OF ISSUES IN THE EIAR

- The approach to assessing the traffic and transport impacts of the proposed Project is based on an industry recognised methodology that has been successfully applied to assessments across Ireland, enhanced with professional judgement where required.
- The traffic and transport impact assessment on the local road network was undertaken in accordance with the Guidelines for the Environmental Assessment of Road Traffic, by the Institute of Environmental Management and Assessment (the IEMA Guidelines). Reference was also made to the EPA Guidelines on the Information to be Contained in Environmental Impact Statements (EPA, 2002) (and revised draft guidelines 2017).
- The Transport Infrastructure for Ireland (TII) publication Traffic and Transport Assessment (TTA) Guidelines, (TII, 2014) was taken cognisance of to determine the appropriate assessment requirements for the Project. Given the net increase in operational traffic will be negligible a TTA was not undertaken as part of this assessment. This approach was agreed through consultation with Limerick City & County Council (LCCC) and Cork County Council (CCC).
- The EPA Guidelines provide a qualitative approach to understanding impacts relating to traffic and transport, the IEMA Guidelines provide thresholds upon which impacts associated with increases in traffic can be assessed and in turn ensures that a robust assessment of impacts is undertaken. Consequently, the traffic and transport related impacts of the proposed Project have been assessed based on the IEMA Guidelines, with any qualitative assessment of impacts based on EPA Guidelines as this is a more robust approach.
- 9 The traffic impact of the proposed Project has been assessed utilising the following approach:
 - Relevant transport policies were reviewed;
 - The road sections likely to be affected by the traffic associated with the proposed Project have been identified;
 - · The existing character of the road network has been determined;
 - Existing traffic levels on the road network have been measured;
 - The additional traffic generated by all stages of the proposed Project has been estimated;
 - The impact of the additional traffic has been assessed; and
 - Appropriate mitigation measures have been identified to ensure that any potential traffic impacts are kept to a minimum.

3. OVERVIEW OF PROJECT SITES

- At XC187 Fantstown it is predicted that there will no significant construction or operational effects as it is a straight closure of the level crossing.
- Severance at this site for local residents and land users was raised during consultation; however the level of use of the existing level crossing, as identified in recent (2019 and 2020) traffic and non-motorised user surveys is very low and has been for many years. Furthermore, evidence provided at the Fantstown Oral Hearing in 2009 stated that "there is little traffic using the road, even agricultural traffic, except at harvest time, and the latter would pose a high risk crossing a railway". This means the significance of this potential effect is likely to be slight.
- At XC201 Thomastown there are no significant residual effects on traffic. The proposed Project will result in better safety as a result of the closure of the level crossing and associated road improvements with no restrictions in traffic crossing the railway once operational.
- At XC209 Ballyhay a CCTV system is proposed. As there is no significant construction associated with the conversion of the existing manned crossing to CCTV control there will be negligible impact during the construction phase. There is no additional traffic generated during the Operational Phase, other than for occasional routine maintenance of the cameras, and so there will be negligible impact to existing traffic as a result.
- The XC211 Newtown proposals comprise the closure of the XC211 Newtown which will reroute traffic to the existing overbridge to the north via a new junction. This will provide the benefit of reducing traffic currently passing the houses to the northwest of the current XC211.
- The realignment of the railway crossing at XC212 Ballycoskery will be beneficial to all road users due to road and junction improvements including new footways and a car park for the school. During the operational phase there will be no additional traffic generated by the works other than very occasional inspection of the new road-over-rail bridge which will be negligible.
- The proposals at XC215 Shinanagh will not generate additional traffic, however, due to the closure of the existing crossing and the new road diversion to the existing road-over-rail bridge to the north there will be some significant traffic redistribution. No significant impacts are predicted as a result of the redistribution.
- At XC219 Buttevant the operational phase of the proposed overbridge will have a negligible effect on traffic generation. The new overbridge will provide improved safety for both vehicle and non-motorised users and unconstrained access across the railway line as a result of the road upgrade and level crossing closure. Delays to traffic due to waiting on a train to pass will be removed as a result of the proposals.
- The construction phase of the Project will result in short term impacts which will be mitigated accordingly through a Construction Traffic Management Plan (CTMP) to ensure there would be no significant residual effects.
- The proposed works at XC187 Fantstown and XC209 Ballyhay will have negligible construction phase impacts due to the proposed closure and CCTV implementation respectively. Notwithstanding a CTMP proportionate to these crossings will be prepared.
- The realigned road sections at XC211 Newtown and XC215 Shinanagh and the overbridges being constructed at XC201 Thomastown, XC212 Ballycoskery and XC219 Buttevant will generate

significant short term impacts which will be mitigated accordingly to ensure there will be no significant residual effects.

- Considering that the nature of traffic increase would be short term, the mitigation measures outlined within a CTMP would ensure that there would be no significant residual effects. A summary justification is as follows:
 - a CTMP will minimise, as far as practicable, traffic impacts during the Construction Phase;
 - large sections of the proposed delivery routes are on national roads, which are established HGV routes;
 - the maximum traffic increases as a result of the Construction Phase related traffic will be temporary; and
 - environmental impacts identified will be managed through a number of mitigation measures within the CTMP, thus ensuring the impacts are not significant.
- On completion of construction, the net increase in traffic movements on the network will be negligible. As the proposed Project includes new diversionary routes there will be localised increases and decreases in traffic flows. Overall it is anticipated that the proposed Project will provide beneficial traffic impacts through road upgrades alleviating the delay from existing crossings and improving standards and safety of a number of rural roads. As such, it is considered that the proposed Project will have negligible residual effects on the local road network.

4. SUBMISSIONS/OBJECTIONS RECEIVED AND RESPONSES

Responses to Issues in Submissions

- In relation to the issues raised in submissions and observations, the submissions have raised some specific issues as well as general concerns about the potential effects upon traffic and transport as a result of the project. The concerns raised relate to issues on:
 - Road safety and capacity
 - Accessibility impacts on journeys for local residents and businesses.
 - Access to property

These matters are addressed Chapter 11 of the EIAR and more particularly the following sections: Section 11.6 of the EIAR which identifies and evaluates the likely significant construction phase and operational phase effects of the project on traffic and transport. Section 11.7 of the EIAR identifies the proposed mitigation measures on the construction and operational phases of the project; section 11.8.1 of the EIAR concludes in relation to the construction phase impact assessment that "the mitigation measures outlined previously (within Section 11.7.1) would ensure that there would be no significant residual effects"; Section 11.8.2 of the EIAR concludes in relation to operation phase impact assessment that "there will be negligible residual effects on the existing road network from the operation of the proposed Project".

I now set out, in summary format, the issues raised in the submissions and objections in relation to traffic and transport and the responses made on behalf of CIÉ. The particularised responses from which these responses are summarised are set out at Appendix 1 to this Statement.

XC187 Fantstown

Submission:

- The closure of the crossing would also mean the end of a popular walkway and cycle route for local residents and the splitting of the community.
- This issue has been raised by Betty Houlihan, Shane Houlihan, Barry Houlihan, Aidan Houlihan, Anthony Fitzgerald, Leonie and David Passmore, Carol Conran, Brian and Lorna Fitzgerald, Geraldine O'Connor, Gabriel Clery, Michael Donegan (of Cappamore Kilmallock Municipal District), Luke Lillingston, Tabitha Lillingston, Valerie Hanley, Cllr Eddie Ryan, Niall Collins TD and Roger Clery.

- A pedestrian survey undertaken over a week indicated no pedestrians, cyclists or livestock crossed the railway between the hours of 0700 and 2100. Several respondents have stated that there are long waiting times to cross under existing conditions.
- The wait times are as a result of the means of operating the manned crossing that are closed to traffic. These are only opened further to request by a road user. The pedestrian gates are locked to ensure this procedure is adhered to by all road users. This may have contributed to the reduced number of non-motorised users in recent years, however, the safety of all users is the priority and the closure is supported by Limerick CCC.

Submission:

- The closure of level crossing XC187 would also lead to the creation of a cul de sac on both sides of the railways tracks, this would increase the risk of crime and dumping on these roads.
- This issue has been raised by Betty Houlihan, Barry Houlihan, Michael Donegan (of Cappamore Kilmallock Municipal District), Luke Lillingston, Tabitha Lillingston, Cllr PJ Carey, Joseph and Donnie Clifford.

Response:

It is considered that the curtailment of access through an area will enhance rather than reduce security levels and there is no basis for the assertion that the closure will give rise to fly-tipping or anti-social behaviour.

Submission:

- 32 The proposed closure has raised concerns for the routing of traffic including farm vehicles and emergency vehicles.
- This issue has been raised by Gabriel Clery, Pat Leahy, Cllr PJ Carey, William Bagnall, John Walsh, Tom O'Donnell, Eamon O'Mahoney, Tabitha Lillingston.

Response:

- 34 The numbers of vehicles currently crossing are very low and the closure will result in a minor increase in journey times for vehicles.
- 35 The journey times will be more consistent as waiting delays are removed.

Submission:

- The validity of the use of traffic volumes, in relation to pedestrian demand, from surveys carried out at the level crossings has been questioned.
- 37 This issue has been raised by Gabriel Clery.

Response:

The pedestrian gates at the crossing have been locked due to safety concerns, however, pedestrians can still use the level crossing by notifying the gatekeeper. This may have contributed to lower pedestrian demand in recent years, however, ensuring the safety of all users is the priority.

Submission:

- The provision of a bridge over the railway would considerably reduce the daily mileage of drivers who have not used the gates for many years due to the delay incurred.
- This issue has been raised by, William Bagnall, Valerie Hanley, Monica Clery, Councillor Mike Donegan, Geraldine O'Conner, Patrick Irvin, Gabriel Clery, Betty Houlihan.

The findings of the February 2019 Feasibility Study are provided in the EIAR. The options assessment was undertaken using a multi-criteria assessment and resulted in the best performing option being the closure of the level crossing.

XC201 Thomastown

Submission:

- Concerns have been raised regarding the requirement for a right turn lane at the proposed junction on the R515.
- This issue has been raised by Scoil Náisiúnta Mhuire, Donal Kelly Effin GAA Club, Cllr Eddie Ryan, Joseph and Ann Clifford, Joseph Clifford Effin and Garrienderk Community, Michael Donegan Cappamore Kilmallock Municipal District, Niall Collins TD, Nuala and Joe O Connor, Patrick O Donovan TD, and Richard O Donoghue TD.

Response:

- As covered by Gerry Healy the requirement for a right-turn lane is governed by a minimum of between 600-5,000 movements AADT for the minor road. The traffic counts at this location indicate a significantly lower number of turnings than the minimum required. While the proposed Project will provide access over the railway line the road condition and width will remain as it is, out with the proposed Project extents. Considering traffic distribution and any journey time improvements the route improvements are not predicted to result in traffic levels close to the threshold. Following consultation with Limerick CCC, who support the proposals at Thomastown, localised widening of the proposed junction with the R515 will be provided to allow vehicles to turn in safely and passing bays will be provided on the minor road.
- The findings of the Stage 1 RSA did not identify any safety concerns with the proposed junction design.

Submission:

- 46 Concerns were raised regarding the width of the proposed road which is not wide enough for two vehicles to pass safely given the use of the road by agricultural vehicles.
- This issue has been raised by Scoil Náisiúnta Mhuire, Donal Kelly Effin GAA Club, Cllr Eddie Ryan, Joseph and Ann Clifford, Joseph Clifford Effin and Garrienderk Community, Michael Donegan Cappamore Kilmallock Municipal District, Niall Collins TD, Nuala and Joe O Connor, Patrick O Donovan TD, and Richard O Donoghue TD.

Response:

- 48 The findings of the Stage 1 RSA did not identify any safety concerns with the design at this location.
- The width of the proposed road is consistent with the current provision and widening at bridge sections would create pinch points at either side, leading to potential conflict with opposing traffic. Passing bays will be provided as part of the proposals on the minor road to assist with traffic flow.

Submission:

- Concerns were raised regarding the speed and traffic volume on the R515. It has been suggested that a speed limit of 50km/h is considered for enforcement as part of the proposals in order to increase traffic safety.
- 51 This has been raised by Richard O Donoghue TD.

Response:

- The proposed scheme will not result in a noticeable change to the characteristics of the R515. The provision of a new junction may reduce traffic speeds slightly as drivers are aware of signing and manoeuvres being undertaken to and from the new junction.
- The R515 is straight in the vicinity of the proposed junction therefore allowing appropriate visibility splays and stopping sight distances to be achieved. A 50km/h speed limit would not be appropriate for this rural section of road as speed differentials could arise between drivers which would result in a road safety issue.

Submission:

- A submission questioned the traffic surveys being undertaken in October given that the summer months are deemed to be busier. During peak summer periods, the roads carry a significant volume of agricultural vehicles in addition to increased flow from tourist and local domestic traffic.
- The proposals will increase traffic volumes, as this route is currently avoided. It is argued that more comprehensive assessment be made of vehicular movement in the general area, spread over a wider, more accurate time frame.
- This has been raised by Richard O Donoghue TD

Response:

- October is mid-Autumn and is considered a neutral month by Transport Infrastructure Ireland (TII) for undertaking traffic surveys. Traffic surveys have been converted to Average Annual Weekday Traffic flows following Transport Infrastructure Ireland guidance (using Daily and Monthly factors) for use in infrastructure design and assessment. Traffic was uplifted to the forecast year of opening as required by the assessment using TII growth factors.
- The proposed road over rail bridge will provide unrestricted access over the railway line, however, the road condition and width will remain as it is, out with the proposed Project extents, between the R515 and Effin Road. Considering traffic distribution and journey time improvements the attractiveness of the route is not predicted to result in a level of traffic that would reach this threshold.

XC211 Newtown

Submission:

- A recent traffic survey concluded that the volume of traffic passing through XC209 Ballyhay was three times greater than XC211 Newtown.
- This has been raised by Aidan O'Connor.

The survey counts at XC209 were approximately double that of XC211. The amount of current traffic was not the deciding factor in either the XC209 remaining open with CCTV and XC211 being closed.

Submission:

- Submissions object to the proposed closure of the crossing which is one of the most popular walking routes in the parish.
- This has been by Nora and Eamonn Davern, Patrick and Helen Morrisey, Patrick and Nodhlaig Devern.

Response:

The existing route north of the village will be maintained albeit with a small increase in walking distance for most residents. The proposals will provide improved safety to pedestrians, cyclists and rail passengers through the closure of the crossing.

XC212 Ballycoskery

Submission:

- Concerns have been raised that the proposed bridge is unsuitable and will make it difficult for school children and other members of the community to get from one side of the village to the other.
- This issue has been raised by Ballyhea National School, Margaret McNamara, Michael O Kelly, Patrick and Helen Morrissey, and Trustees of The Diocese of Cloyne -various reg lands.

Response:

- There will be no loss of connectivity due to new overbridge and it will be an improvement to pedestrians and cyclists as the new road is an upgrade of the existing route.
- With the closure of the crossing there will be improved safety to pedestrians, cyclists and rail passengers. With the new road alignment proposed to the south of the school there will be less through traffic moving at speed past the school and therefore improving road safety for school pupils. The proposed car park will also provide a safer drop off facility for the school than the current provision.

Submission:

- Concerns have been raised regarding the preferred route for the M20 Motorway between Cork and Limerick. This will require the construction of an overbridge to carry the motorway over the railway line.
- Given the proximity of the M20 overbridge and the overbridge at Ballycoskery there will be an impact on the village of Ballyhea. Therefore the application for the overbridge at Ballycoskery should be declined.
- 71 This issue was raised by in a submission by Ballyhea National School.

While the preferred route for the M20 has been identified the route at Ballycoskery is indicative and will be subject to significant design work before the final route detail is determined. The timescales of a project of the scale of the M20 is such that it is predicted that the construction of the overbridge to replace the XC212 will be completed in advance of the M20 infrastructure. The M20 project team have estimated that the construction period will commence in 2027. Therefore the M20 project will have to consider the Ballycoskery overbridge, when designing the motorway infrastructure.

Submission:

- The decision to approve the draft railway works order for Ballycoskery would be premature pending the final design and approval of the adjacent M20 project which may include alterations to the local road network which would obviate the need for an overbridge in the centre of Ballyhea village.
- 74 This issue has been raised in a submission by Trustees of Diocese of Cloyne.

Response:

The construction of the motorway would not obviate the need for an overbridge as local access will still be required to either side of the railway line irrespective of the route and design of the motorway. It is predicted that the N20, on completion of the motorway, would be incorporated into the local road network and potentially be re-classified to a regional road.

XC219 Buttevant

Submission:

- Access on the northwest corner of a field at Buttevant is not provided. The design would need an access to the north-west part of the lands by providing an underpass under the proposed road.
- 77 This issue has been raised in a submission by Daniel Lucey.

Response:

For access to the north west area of land, a gated access can be provided from the existing road. An underpass into this area is not feasible due to the headroom constraints.

Submission:

- The proposed road fails to provide safe pedestrian connectivity. A safe continuous footpath should be provided through the length of the road alignment to accommodate safe access for local residents.
- This issue has been raised in a submission by Michael Kennedy and Deirdre Ryan.

Response:

The pedestrian connectivity to the wider area is maintained and pedestrian and cyclists will have the same accessibility as currently available. There is currently no footway on the west side of the railway line therefore the current provision will be maintained. The scheme will be an improvement to pedestrians and cyclists as the new road is an upgrade of the existing route. Overall, greater safety to pedestrians, cyclists and rail passengers will be provided through the closure of the crossing.

APPENDIX 1: Particularised Responses to Traffic & Transport Submissions

XC187 Fantstown

Submission:

- The closure of the crossing would also mean the end of a popular walkway and cycle route for local residents and the splitting of the community.
- This issue has been raised by Betty Houlihan, Shane Houlihan, Barry Houlihan, Aidan Houlihan, Anthony Fitzgerald, Leonie and David Passmore, Carol Conran, Brian and Lorna Fitzgerald, Geraldine O'Connor, Gabriel Clery, Michael Donegan (of Cappamore Kilmallock Municipal District), Luke Lillingston, Tabitha Lillingston, Valerie Hanley, Cllr Eddie Ryan, Niall Collins TD and Roger Clery.

Response:

- A pedestrian survey was carried out in January 2020 and over a period of a week no pedestrians, cyclists or livestock crossed the railway between the hours of 0700 and 2100. Furthermore, a number of respondents have made submissions stating that there are long waiting times to cross under existing conditions, with one respondent stating that the community was already divided as a result.
- The wait times are as a result of the gatekeeper being required to contact the rail operator to confirm it is safe to allow users to cross. This is standard practice at all manned crossings that are closed to traffic and are opened only further to a request by a road user. Pedestrian gates are locked to ensure this procedure is adhered to by all road users, not only those who require the barrier to be opened in order to cross. This may have contributed to the reduced number of non-motorised users in recent years, however, ensuring the safety of all users is of priority in the management of level crossings. With the current use by non-motorised users it is considered that closing the level crossing will not cause a significant impact on the community.
- 86 The closure of XC187 Fantstown is supported by Limerick County & City Council (Limerick CCC).

Submission:

- The closure of level crossing XC187 would also lead to the creation of a cul de sac on both sides of the railways tracks, this would increase the risk of crime and dumping on these roads.
- This issue has been raised by Betty Houlihan, Barry Houlihan, Michael Donegan (of Cappamore Kilmallock Municipal District), Luke Lillingston, Tabitha Lillingston, Cllr PJ Carey, Joseph and Donnie Clifford.

- 89 It is considered that the curtailment of access through an area will enhance rather than reduce security levels.
- There is no basis for the assertion that the areas within the Railway Order will give rise to fly-tipping or anti-social behaviour. Further there is no evidence provided in the submissions to support the theory that the creation of these sections of unused road will lead to an increase in anti-social behaviour; nor is there any evidence of this nature published by Limerick CCC.

91 The roads are currently, and will remain, under the control of Limerick CCC who support the closure of the XC187 Fantstown. It is for Limerick CCC to determine how they will be used and maintained once the level crossing is closed.

Submission:

- 92 The proposed closure has raised concerns for the routing of traffic including farm vehicles and emergency vehicles. Comments have been made that this will increase journey times and increase vehicle emissions.
- This issue has been raised by Gabriel Clery, Pat Leahy, Cllr PJ Carey, William Bagnall, John Walsh, Tom O'Donnell, Eamon O'Mahoney, Tabitha Lillingston.

Response:

- The numbers of vehicles currently crossing are very low and while there will be diversions for some the increase in journey length is approximately 4.5km; this represents a minor increase in journey times for vehicles and is not considered to be significant and, when compared to existing journey times, including wait times at the level crossing, the diversion could potentially result in a shortening of journey times for through traffic.
- Journey times will be more consistent as delays due to waiting at the level crossing are removed. The closure will remove engine idling time currently incurred by vehicles waiting for the gates to open which will help mitigate any increased emissions.

Submission:

- The validity of the use of traffic volumes, in relation to pedestrian demand, from surveys carried out at the level crossings has been questioned.
- 97 This issue has been raised by Gabriel Clery.

Response:

The pedestrian gates at the crossing have been locked due to safety concerns, however, pedestrians can still use the level crossing by notifying the gatekeeper. This is standard practice at all manned crossings that are closed to traffic and are opened only further to a request by a road user. The gates are locked to ensure this procedure is adhered to by all users, not only those who require the barrier to be opened in order to cross. This may have contributed to the reduced number of non-motorised users in recent years, however, ensuring the safety of all users is of priority in the management of level crossings.

Submission:

- The provision of a bridge over the railway would considerably reduce the daily mileage of drivers who have not used the gates for many years due to the delay incurred.
- This issue has been raised by, William Bagnall, Valerie Hanley, Monica Clery, Councillor Mike Donegan, Geraldine O'Conner, Patrick Irvin, Gabriel Clery, Betty Houlihan.

101 The findings of the February 2019 Feasibility Study are provided in the EIAR. The options assessment was undertaken using a multi-criteria assessment and resulted in the best performing option being the closure of the level crossing.

XC201 Thomastown

Submission:

- 102 Concerns have been raised regarding the requirement for a right turn lane at the proposed junction on the R515.
- This issue has been raised by Scoil Náisiúnta Mhuire, Donal Kelly Effin GAA Club, Cllr Eddie Ryan, Joseph and Ann Clifford, Joseph Clifford Effin and Garrienderk Community, Michael Donegan Cappamore Kilmallock Municipal District, Niall Collins TD, Nuala and Joe O Connor, Patrick O Donovan TD, and Richard O Donoghue TD.

Response:

- As covered by Gerry Healy the requirement for a right-turn lane is governed by a minimum of between 600-5,000 movements AADT for the minor road. The traffic counts at this location indicate a significantly lower number of turnings than the minimum required. While the proposed Project will provide access over the railway line the road condition and width will remain as it is, out with the proposed Project extents. Considering traffic distribution and any journey time improvements the route improvements are not predicted to result in traffic levels close to the threshold. Following consultation with Limerick City & County Council, who support the proposals at Thomastown, localised widening of the proposed road at its junction with the R515 will be provided for a length of approximately 15m to allow vehicles to turn in from the R515 and pass a waiting vehicle. In addition a passing bay will be provided on the minor road to assist with traffic flow.
- 105 A Stage 1 Road Safety Assessment has been undertaken by an approved road safety auditor in accordance with TII GE-STY-01024 Road Safety Audit. The findings of the RSA did not identify any safety concerns with the design at this location.

Submission:

- 106 Concerns were raised regarding the width of the proposed road which is not wide enough for two vehicles to pass safely. Moreover, the number of farms in close proximity to the rail crossing, and hence the movement of agriculture machinery.
- This issue has been raised by Scoil Náisiúnta Mhuire, Donal Kelly Effin GAA Club, Cllr Eddie Ryan, Joseph and Ann Clifford, Joseph Clifford Effin and Garrienderk Community, Michael Donegan Cappamore Kilmallock Municipal District, Niall Collins TD, Nuala and Joe O Connor, Patrick O Donovan TD, and Richard O Donoghue TD.

- 108 A Stage 1 Road Safety Assessment has been undertaken by an approved road safety auditor in accordance with TII GE-STY-01024 Road Safety Audit. The findings of the RSA did not identify any safety concerns with the design at this location.
- The width of the proposed road is consistent with the current provision and widening at bridge sections would create pinch points at either side, leading to potential conflict with opposing traffic. Notwithstanding, following consultation with Limerick City & County Council, who support the

proposals at Thomastown, localised widening of the proposed road at its junction with the R515 will be provided for a length of approximately 15m to allow vehicles to turn in from the R515 and pass a waiting vehicle. In addition a passing bay will be provided on the minor road to assist with traffic flow.

Submission:

- 110 Concerns were raised regarding the speed and traffic volume on the R515. It has been suggested that a speed limit of 50km/h is considered for enforcement as part of the proposals in order to increase traffic safety.
- 111 This has been raised by Richard O Donoghue TD.

Response:

- The proposed scheme will not result in a noticeable change to the characteristics of the main road.

 The provision of a new junction may reduce traffic speeds slightly as drivers are aware of signing and manoeuvres being undertaken to and from the new junction.
- The R515 is straight in the vicinity of the proposed junction therefore allowing appropriate visibility splays and stopping sight distances to be achieved. A 50km/h speed limit would not be appropriate for this rural section of road as speed differentials could arise between drivers which would result in a road safety issue.

Submission:

- Baseline figures from the assessment of existing traffic movement that have been provided as part of the Irish Rail submission, are based on ATC, JTC and NMU Surveys were taken over periods in October 2019. It is felt that this period of recording is not an accurate reflection of the actual numbers and types of vehicular movement on these roads, given that this recording was taken midwinter. During peak summer periods, the R515 & L8572 accommodate significant volumes of agricultural vehicular movement (road legal 3 metre wide vehicles with single point articulated trailers), in addition to increased flow from tourist and local domestic traffic. This route at present serves 20 children attending primary school in Effin, with increasing numbers annually, in addition to vehicular movement of 2 no. articulated bulk milk tankers on a daily basis, serving local dairy farms.
- The improvement work proposed will in turn increase traffic volume, as at present, this route is often avoided, as the level crossing is manned and there is a delay for the manual operation to allow traffic flow. It is argued that more comprehensive assessment be made of vehicular movement in the general area, spread over a wider, more accurate time frame, in order to assist in accurate demonstration of traffic flow, with an extrapolation to 30 year design parameters.
- 116 This has been raised by Richard O Donoghue TD.

Response:

October is mid-Autumn and is considered a neutral month by Transport Infrastructure Ireland (TII) for undertaking traffic surveys. Traffic surveys have been converted to Average Annual Weekday Traffic flows following Transport Infrastructure Ireland guidance (using Daily and Monthly factors) for use in infrastructure design and assessment. Traffic was uplifted to 2022 forecast year during assessment using TII growth factors to consider during assessment.

The proposed road over rail bridge will provide unrestricted access over the railway line, however, the road condition and width will remain as it is, out with the proposed Project extents, between the R515 and Effin Road. Considering traffic distribution and journey time improvements the attractiveness of the route is not predicted to result in a level of traffic that would reach this threshold.

XC211 Newtown

Submission:

- A recent traffic survey concluded that the volume of traffic passing through XC209 Ballyhay was three times greater than XC211 Newtown.
- 120 This has been raised by Aidan O'Connor.

Response:

The survey counts at XC209 were approximately double that of XC211. The amount of current traffic was not the deciding factor in either the XC209 remaining open with CCTV and XC211 being closed.

Submission:

- Our main concern with the project is we strongly object to the proposed closure of this crossing. This is one of the oldest right-of-ways in Ballyhea and is used not just by us but by a large number of people for access to school etc. It is also one of the most popular walking routes in the parish.
- 123 This has been by Nora and Eamonn Davern, Patrick and Helen Morrisey, Patrick and Nodhlaig Devern.

Response:

The existing route north of the village will be maintained albeit with a small increase in walking distance for most residents. The proposals will provide improved safety to pedestrians, cyclists and rail passengers through the closure of the crossing.

XC212 Ballycoskery

Submission:

- It is plainly evident that no account has been taken of the interconnectivity of both sides of the existing crossing, the local population's daily need to use of the crossing, and in particular the local schoolchildren and their parents' and teachers' needs to do so. This does not even take account of the church and school interconnectivity, something that involves regular communication and travel (often en masse) between the two locations.
- This issue has been raised by Ballyhea National School, Margaret McNamara, Michael O Kelly, Patrick and Helen Morrissey, and Trustees of The Diocese of Cloyne -various reg lands.

Response:

127 There will be no loss of connectivity due to new overbridge and it will be an improvement to pedestrians and cyclists as the new road is an upgrade of the existing route.

128 With the closure of the crossing there will be improved safety to pedestrians, cyclists and rail passengers. With the new road alignment proposed to the south of the school there will be less through traffic moving at speed past the school and therefore improving road safety for school pupils. The proposed car park will also provide a safer drop off facility for the school than the current provision.

Submission:

- 129 Concerns have been raised regarding the preferred route for the M20 Motorway between Cork and Limerick. This will require the construction of an overbridge to carry the proposed M20 over the Cork to Dublin railway line and onto the flood plain of the Awbeg River to the south and south west of Ballycoskery level crossing XC212, and within sight of it.
- Given the proximity of the M20 overbridge and the CIEs application for an overbridge at Ballycoskery there will be an impact on the village of Ballyhea, its connectivity, on its cohesion and immediate environment. Therefore the application for the overbridge at Ballycoskery to replace XC212 should be declined.
- 131 This issue was raised by in a submission by Ballyhea National School.

Response:

While the preferred route for the M20 has been identified the route at Ballycoskery is indicative and will be subject to significant design work before the final route detail is determined. The timescales of a project of the scale of the M20 is such that it is predicted that the construction of the overbridge to replace the XC212 will be completed in advance of the construction of any M20 infrastructure at Ballycoskery. The M20 project team have estimated that the construction period will commence in 2027. Therefore the M20 project will have to consider the infrastructure within Ballycoskery, including the proposed overbridge to replace the XC212, when developing the detailed design of the motorway infrastructure.

Submission:

- The decision to approve the draft railway works order for the Ballycoskery would be premature pending the final design and approval of the adjacent M20 project which may include alterations to the local road network which would obviate the need for an overbridge in the centre of Ballyhea village.
- 134 This issue has been raised in a submission by Trustees of Diocese of Cloyne.

Response:

The construction of the motorway would not obviate the need for an overbridge as local access will still be required to either side of the railway line irrespective of the route and design of the motorway. It is predicted that the N20, on completion of the motorway, would be incorporated into the local road network and potentially be re-classified to a regional road.

XC219 Buttevant

Submission:

Access on the northwest corner of the field Folio CK26597F is not provided. To satisfy the needs of the holding, the design would need an access to the north-west part of the lands by providing an underpass under the proposed road next to the western boundary where adequate headroom can

be achieved. It would also need a new access onto the old road with adequate sight lines and safe stopping distances.

137 This issue has been raised in a submission by Daniel Lucey.

Response:

With regards to access to the north west area of land, a gated access can be provided from the existing road. An underpass into this area is not feasible due to the headroom constraints in this area.

Submission:

- The proposed road space will present a harsh pedestrian environment, not conducive to a comfortable walking environment. No pedestrian crossing provided for our clients to cross the bridge and so they are cut off from walking northward from their house. Failure to provide safe pedestrian connectivity could lead to pedestrians crossing the road at unsafe location possibly resulting in collisions with passing vehicles. A safe continuous footpath should be provided through the length of the road alignment to accommodate safe access for local residents along the route.
- 140 This issue has been raised in a submission by Michael Kennedy and Deirdre Ryan

Response:

The pedestrian connectivity to the wider area is maintained and pedestrian and cyclists will have the same accessibility as currently available. There is currently no footway on the west side of the railway line therefore the current provision will be maintained. The scheme will be an improvement to pedestrians and cyclists as the new road is an upgrade of the existing route. Overall, greater safety to pedestrians, cyclists and rail passengers will be provided through the closure of the crossing.