

An Bord Pleanála,  
Strategic Infrastructure Development Section  
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<b>AN BORD PLEANÁLA</b>	
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Subject: Foynes to Limerick Road – Adare By-Pass

Eamonn and Lorraine Kirby,  
Kilknockan,  
Adare,  
Co. Limerick

### Impact

While we welcome the development of the Foynes to Limerick Road (including Adare Bypass) and the investment in County Limerick, we would ask the Board, in its decision making, to give due consideration to the concerns outlined below which are shared by all residents in the Kilknockan area.

In considering the merits of the Scheme and its impacts we ask the Board to consider in particular the proposed height of mainline road embankment through Kilknockan. While we note and accept that the road must rise to cross the flood defence at the Greanagh River at Ch59+250 we do not believe that the current design provides either an optimal design on the grounds of:

- Landscape and Visual Impacts
- Noise
- Sustainability/Carbon Emissions
- Cost

The onus is on the Developer of the proposed project to provide a scheme which minimises the environmental impacts of the Scheme while achieving the objectives of the Scheme. We do not believe that this is the case on this section of the Scheme through Kilknockan as we outline as follows

#### 1. Landscape and Visual – Above Ground Road Elevation

The current landscape around Kilknockan is of a quite rural and agricultural nature with significant hedgerow and lines of mature trees, crossed by Local Road L-4422, the Greanagh River and the slight embankments of the disused Foynes Limerick Rail line.

The proposed road is located to the front and adjacent to our private dwelling and the proposed levels of the roadway as outlined in Fig 4.44 of the EIS will result in a significant visual impact on our property, and that of our neighbours and is of a scale which is alien to the current landscape environment. At Chainage 59+100 the finished road level will be 9.316m above existing ground level, equivalent to ridge height for many of the two storey houses in the area. This wall of an embankment which extends for almost 2km at varying height poses a very real visual intrusion on the landscape in Kilknockan and we respectfully request that this section of the route be reviewed in line with previous submissions by local residents at the route selection stage of the project and in subsequent liaison with the Limerick County Council's Regional Road Design Office.

All the local residents had requested during the design stage that the L-4422 be built over the new road which would have substantially reduced the height of the mainline embankment west of the Greanagh River Bridge. The alignment could further have been optimised by combing Underpass UP16 with a widened OB07 (requiring short extensions of the proposed accommodation track) or UB09 (converted to an overbridge) to accommodate the proposed accommodation track.

While this option creates an embankment along a proposed realigned L4422 the size of the embankment would be significantly less given the ability to use larger gradients on the local road realignment and the smaller cross-section would result in significantly less material than in the mainline embankment.

Independent design analysis suggests that a viable drainage system can be designed while allowing the L-4422 cross over the proposed road.

We further note that clearance above the flood bunds on the Greanagh River is of the order of 7.389m. This appears to be excessive, even allowing for any requirement for maintenance vehicles to traverse along the top of the flood bunds. We believe that the level of the mainline over the River Greanagh can be significantly reduced from that shown in Fig 4.44 and reduce visual impact and reduce cost of the Scheme.

As no photomontage has been made available to show the finished proposed development view post mitigation we would request that a thorough landscape mitigation plan would be provided in the detailed design and would at the very minimum be in line with the best practice guidelines as set out by the TII.

The policy of the TII is to use their projects as an opportunity to make things better from a landscape and visual perspective, we would encourage a review of the embankment height within this area so as to minimise as far as possible the visual impact the proposed road will bring to our neighbourhood.

## **2. Noise**

The height of the proposed road elevation above ground level in the area adjacent to our private dwelling brings major noise pollution to an existing rural setting where current noise levels are very low.

Residual noise measures presented for our property (Receptor D59-005) in Appendix 12.1 while indicating an ultimate level below the mitigation threshold do indicate 53% increase in db levels at year of opening in the DO-Something Scenario. This represents a very significant increase in noise levels at our property and we respectfully request the Board to condition significant noise attenuation measures as part of any grant of approval, in order to reduce predicted noise volumes at our property.

## **3. Sustainability/ Carbon Emissions**

The suggested reduction in mainline embankment height described above will also assist from a sustainability point of view in significantly reducing the importation of earthwork fill material required in this area and assist in reducing the substantial deficit of 1.3 million cubic metres of material on the project. This figure represents approximately 325,000 truck movements to and from the site which represents a significant carbon load.

We estimate that lowering the mainline and realigning the L-4422 over the mainline will result in a net earthwork fill reduction of the order of 90,000 cubic metres which would result in a reduction of approximately 22,500 truck movements during construction.

#### 4. Cost

As taxpayers we are concerned that the design presented in the EIS Fig 4.44 does not represent an optimal design, as described in 1 above, that will derive best value for money for the taxpayer. There is an onus on Limerick County Council and TII to develop a Scheme which meets, national, regional and local policy objectives while minimising environmental impact and delivers best value for money for the taxpayer.

The issues above and alternative design proposed clearly shows that the current proposal as outlined in the EIS is not an optimal scheme design in terms of cost and the Board is reminded of the debacle of the National Children's Hospital as how poorly thought out development can affect public spending in critical delivery areas.

#### Other issues arising:

##### Proposed Haulage Routes

We are concerned that the L4422 could possibly be used as a haulage route for the construction of this Scheme and that heavy construction vehicles could use a road currently used by our children to cycle to and from school and the safety impact that this may have.

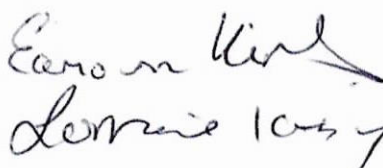
We note that in granting approval for other National Route Scheme previously the Board has restricted haulage routes to National and Regional Routes to avoid safety issues on local roads during construction. We respectfully request that if the Board are minded to grant approval for this Scheme that similar restrictions be placed on this Scheme.

Should the Board decide to allow the L-4422 be used for haulage we would respectfully ask that the following be conditioned:

1. Speed limits to be imposed and monitored during construction to ensure haulage vehicle speeds are limited.
2. Falling Way Deflectometer Analysis to prove that the existing road structure is of a fit state for the proposed haulage of materials to the project.
3. Quantity of materials to be hauled on this road to be limited bearing in mind that there is over 1.3 million cubes of material to be imported to the project.
4. Post works to ensure the road is left in a fit state following construction works.
5. Days of the week and hours of the day when haulage is permitted on this road to avoid periods when children may be cycling to/from school.
6. Measures to keep the road clean and free from debris during construction works.

As long standing residents and landowners in the area of Kilknockan our concerns and observations are very real and would respectfully ask that An Bord Pleanála make a detailed assessment of the EIAR for this Scheme and ensure that all best practice design guidelines are fully complied with and environmental impact minimised.

Name: Eamonn & Lorraine Kirby



Date: 12-02-2020