

An Bord Pleanála
Strategic Infrastructure Development Section
64 Marlborough Street
Dublin 1 D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
04 FEB 2020	
Fee: €	_____ Type: _____
Name: _____	By: <u>Post.</u>

KILKNOCKAN
ADARE
Co. LIMERICK
V9436F2

Subject: Foynes to Limerick Road - Adare by-pass
Mainline plan & profile – Rathkeale to Attyflin - section D sheet 7

IMPACT

The development of the Adare by-pass is welcomed and positive.

The impact of the development brings a serious concern for nearby residents and land owners.

In the proposed outline and finished elevation above existing ground level as set out in the above drawing please note the following real concerns.

Drawing not to scale, does not give full consideration of what the proposed finished build will look like.

1. Landscape and visual – above ground road elevation.

At the Greanagh river the proposed finished elevation of the road is 9.2 meters above existing ground level, 30.2 feet.

This will have a very negative imposing impact and disturbance to nearby properties.

This finished elevation is too high and will remain a major **eye sore and ugly** development of a permanent structure.

In addition, **no** photomontage is made available to show the finished proposed development view and a post mitigation view from the L-1422 road.

SEE PICTURE #1 ATTACHED.

A satisfactory landscape mitigation, which would be in line with best practice guideline, as set out by the NRA is required.

[https://www.tii.ie/technical-services/environment/planning/A Guide to Landscape Treatments for National Road Schemes in Ireland.pdf](https://www.tii.ie/technical-services/environment/planning/A%20Guide%20to%20Landscape%20Treatments%20for%20National%20Road%20Schemes%20in%20Ireland.pdf).

The policy of the National Roads Authority is to use a road project as an opportunity to make things better from a landscape and visual perspective.

The proposed design must be in line with best practice, this is not being complied with, height and visual impact are very excessive.

Section 4.2.2 on Embankments on page 51 applies. Below is a snippet from Section 4.2.2.

In some circumstances, treatments may be utilised for visual screening in order to reduce loss of naturalness and contrasts of scale, where such components and traffic are visible to local inhabitants and from amenities.

Treatments can also be designed to facilitate the creation of vistas (Figure 3.11) through the planting of trees and shrubs, where appropriate, near the top of embankments. Such planting will have the effect of framing views (vistas) whilst also screening the upper embankment and associated traffic. By contrast, appropriate treatments can also be placed at the base of slopes in order to provide connectivity and to defragment core habitat areas. The latter will also retain more open views (panoramas) for the mobile road user on the elevated road.

Key Issues for Embankments

- Selected treatments need to consider the physical nature of the site, including aspects of geology, engineering, soil, stability, drainage and microclimate.
- Given the general inaccessibility of steep slopes, treatments should aim to minimise long-term maintenance requirements.
- An open habitat-mosaic approach, with good horizontal and vertical structural differentiation, should be considered for the selection and layout of treatments.
- Where embankments are visually dominating within the adjacent and wider landscape, treatments should be selected so as to provide visual screening, where appropriate.
- The selection and layout of treatments should also seek to provide connectivity and defragmentation of core habitat areas and opportunities for the creation of framed (vista) and open (panoramic) views.

2. Noise

The height of the proposed road elevation above ground level brings a major noise condition with fast moving traffic.

With no photomontage available, residents and landowners cannot see what is proposed to mitigate this 24 – 7 impact even when one is in bed in a rural setting.

Are noise abatement barriers - finished road surface designs part of the build to minimise this impact?

The NRA's noise guidance document for roads projects looks to address this 24 – 7 impact.

[https://www.tii.ie/technical-services/environment/planning/Guidelines for the Treatment of Noise and Vibration in National Road Schemes.pdf](https://www.tii.ie/technical-services/environment/planning/Guidelines%20for%20the%20Treatment%20of%20Noise%20and%20Vibration%20in%20National%20Road%20Schemes.pdf).

Firstly extensive baseline noise surveys and a noise model have to be included within the EIS.

Section 2.3 of the above document sets out the **design goals** for a new road project.

The EIS and planning application to An Bord Pleanála has to be able to demonstrate that they have met these goals. Reference section 6.2

6.2 Approach

The noise input to the EIS follows on from the work undertaken as part of the Constraints Study and Route Corridor Selection. There should already be an awareness of the primary issues associated with the final route selection, which will permit accurate scoping of the detailed noise study that is required in support of an EIS. A full EIS noise study should involve at least the following:

- ⊙ a series of noise surveys to quantify the prevailing noise climate at sensitive receptors along the existing and proposed routes. These surveys will assist in identifying the positive and negative impacts of a proposed scheme.
- ⊙ preparation and calibration of a suitable traffic noise prediction model.
- ⊙ prediction of Do-Minimum and Do-Something noise levels for opening and design years.
- ⊙ comparison of predicted Do-Something noise levels with the Do-Minimum and three conditions that must be satisfied before mitigation measures are deemed necessary.
- ⊙ specification and assessment of road traffic noise mitigation measures, where required.
- ⊙ assessment/review of construction impacts and mitigation measures.
- ⊙ assessment/review of vibration.

Additionally, NRA guidance on noise good practice has to be complied with.

[https://www.tii.ie/technical-services/environment/planning/Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes.pdf](https://www.tii.ie/technical-services/environment/planning/Good%20Practice%20Guidance%20for%20the%20Treatment%20of%20Noise%20during%20the%20Planning%20of%20National%20Road%20Schemes.pdf)

3. Sunrise / sun setting

'Shadowcasting' impact of the proposed development must be assessed. In the case the height of the proposed development will have an impact.

What is the impact at Winter and Summer Solstice and Spring Equinox.

This assessment must cover the full spectrum of shadows that will be cast (longest to shortest). Evening summer sunsets will be changed.

As a long-standing resident, landowner in the adjoining area, one that plans to live in the townland for the future, our concerns are very real and would ask that Board Pleanála make a detailed assessment and ensure that all best practice guidelines and standards are fully complied with.

Name: John J. Horan C. Eng M.I.E.I.

Date: 2-2-2020
Maicéad Connel Horan

Attachment -

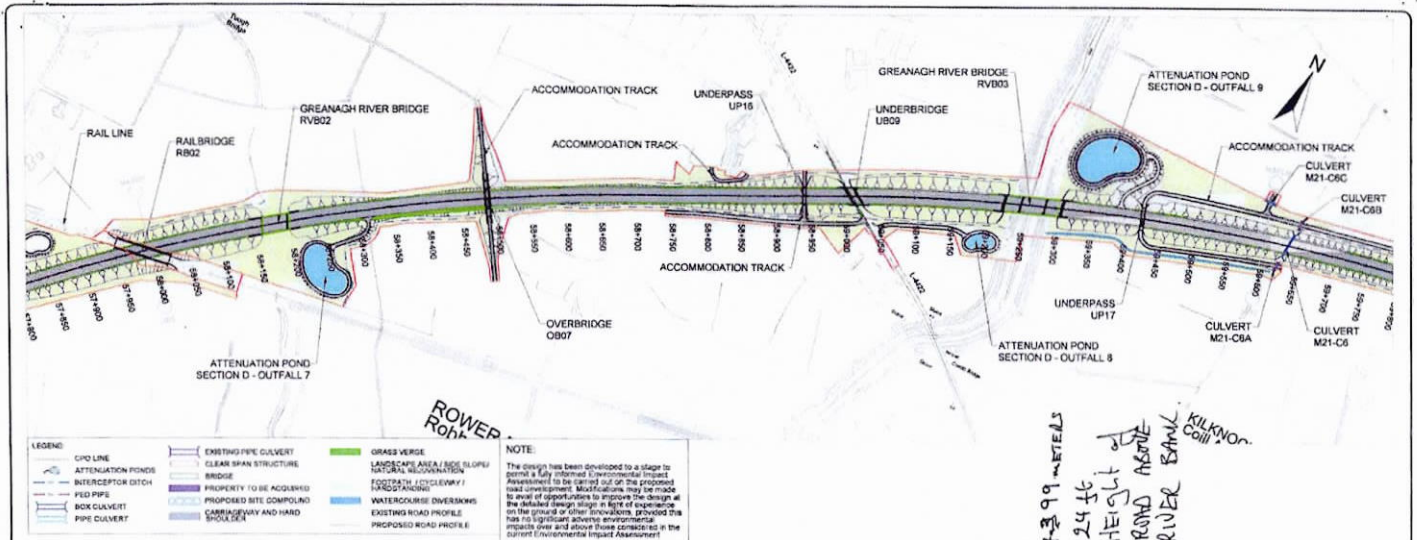
Drawing Title

**MAINLINE PLAN & PROFILE
RATHKEALE TO ATTYFLIN - SECTION D
SHEET 7 OF 12**

Designed	IC	Date	14.12.1	Checked	EAR	
Drawn	LW	Scale	1:5000 (BS A3)	Drawing No.	Fig 4.44	
Checked	MH	Date	December 2019	Rev	-	
Approved	DMC					

DO NOT SCALE USE FIGURED DIMENSIONS ONLY

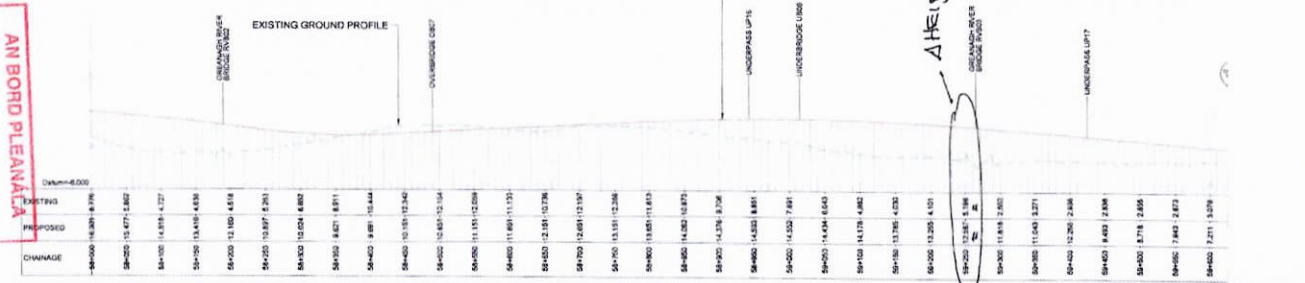
2) PICTURE #1.



- LEGEND**
- CPO LINE
 - ATTENUATION PONDS
 - INTERCEPTOR DITCH
 - FIELD PIPE
 - BOX CULVERT
 - PIPE CULVERT
 - EXISTING PIPE CULVERT
 - CLEAR SPAN STRUCTURE
 - BRIDGE
 - PROPERTY TO BE ACQUIRED
 - PROPOSED SITE COMPOUND
 - CARRIAGEWAY AND HARD SHOULDERS
 - GRASS VERGE
 - LANDSCAPE AREA / NICE SLOPE
 - FOOTPATH (CYCLEWAY) / WALKWAY
 - WATERCOURSE DIVERSIONS
 - EXISTING ROAD PROFILE
 - PROPOSED ROAD PROFILE

NOTE:
The design has been developed to a stage to permit a fully informed Environmental Impact Assessment to be carried out on the proposed road development. Modifications may be made to avoid or opportunities to improve the design at the detailed design stage in light of experience on the ground or other innovations, provided this has no significant adverse environmental impacts over and above those considered in the current Environmental Impact Assessment.

Handwritten notes:
HEIGHT = 7.399 METERS
= 24 ft
HEIGHT of ROAD ABOVE RIVER BANK
KILKNON CO. IRE.



LOG-ASP
DATE: 04 FEB 2020
AN BORD PLEANÁLA

2040
Department of Transport, Tourism and Sport

TII
Transport Infrastructure Ireland

Roughan & O'Donovan-AECOM Alliance
AECOM

Foynes to Limerick Road (including Adare Bypass)
Environmental Impact Assessment Report

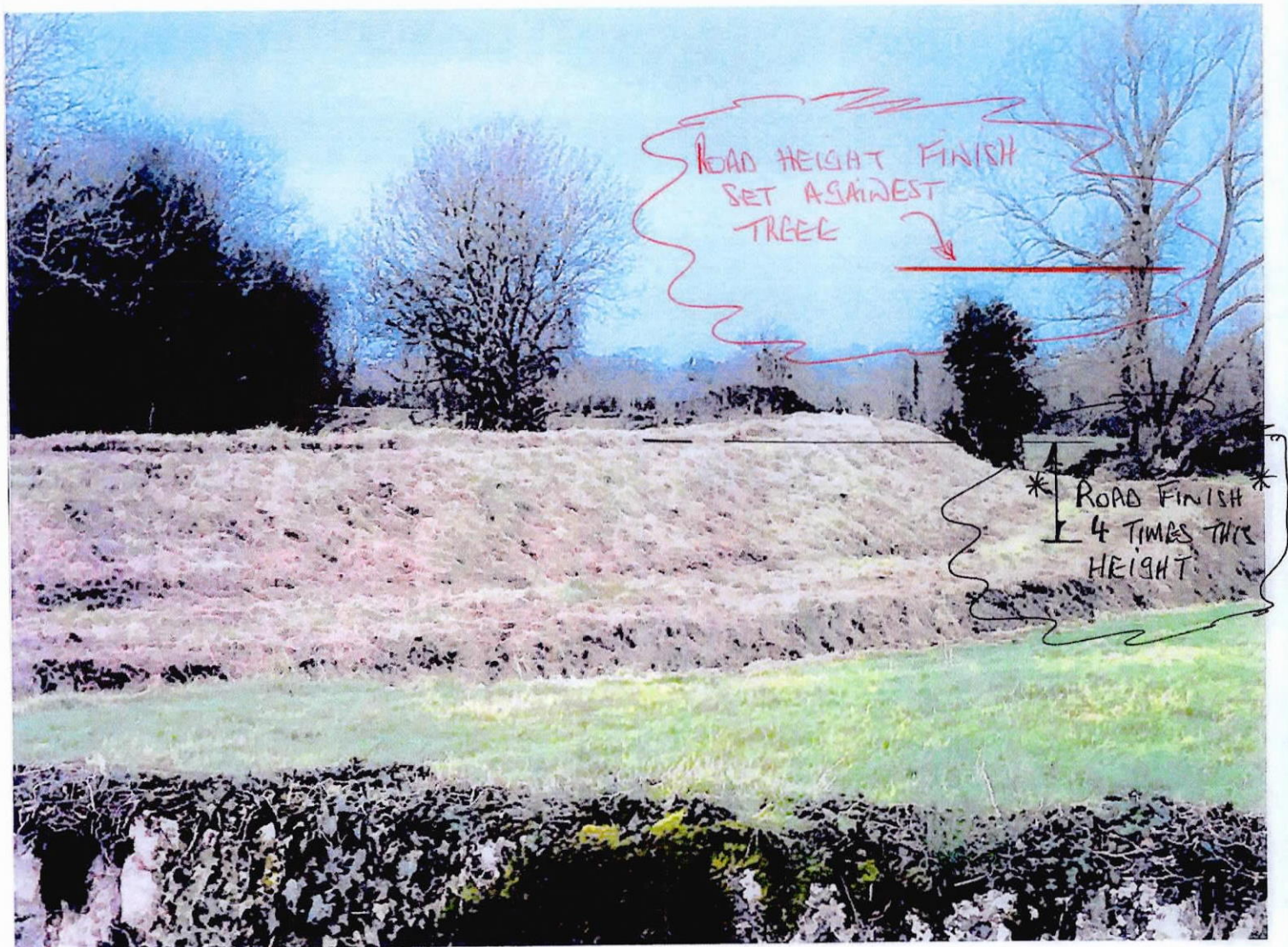
MAINLINE PLAN & PROFILE
RATHKEALE TO ATTYPLIN - SECTION D
SHEET 7 OF 12

DO NOT SCALE OR USE FOR ANY PURPOSES OTHER THAN AS SHOWN



GREENASH RIVER BRIDGE RVBOS - PROPOSED DESIGN

PICTURE #1 - HEIGHT OUTLINE OF ROAD



From IDLO REF: FIG 4.44.

AT GRID 59+250 - HEIGHT MEASUREMENTS.

- ROAD FINISHED SURFACE WILL BE '4' TIMES HEIGHT OF BANK.
- ALLOW FOR +4 METERS OF NOISE ABATEMENT BARRIERS HEIGHT.
- EXTENSIVE POST-MITIGATION WORKS REQUIRED TO COMPLY WITH BEST PRACTICE MOTORWAY ROAD BUILD IMPACT.