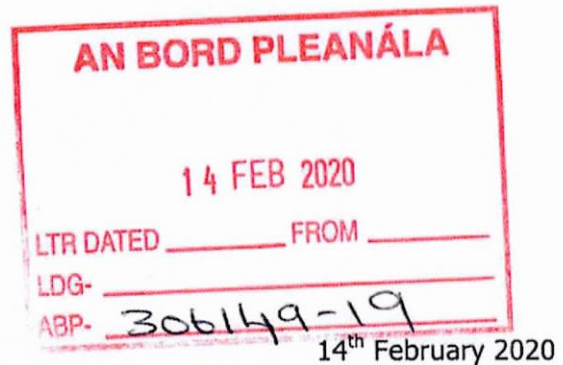


An Bord Pleanála
Strategic Infrastructure Development Section
64 Marlborough Street
Dublin 1

Sent by email to: bord@pleanala.ie



RE. FOYNES TO LIMERICK ROAD PROJECT INCLUDING ADARE BYPASS

To Whom It May Concern,

This project proposal has been referred to An Taisce by Limerick City and County Council.

Preliminary consideration of strategic investment priorities for the climate and biodiversity loss emergency

This application must meet a preliminary sustainable development test.

The current national investment policies upon which this scheme is justified, including the National Development Plan and National Roads Programme 2018-2027, are no longer fit for purpose.

Continued over-scaled road building would represent a misdirection of limited investment resources, when we need to address the accelerating global climate and biodiversity loss emergency.

Future Earth, an international sustainability network, conducted a study¹ involving surveying 222 scientists from 52 countries which found that a "perfect storm" of climate breakdown, extreme weather, species loss and a food production crisis is imminent, whereby the combination of the above threats amplifies the risk posed by each individually. Moreover, Future Earth concluded that governments, business, civil society, etc. do not adequately recognise the inextricably linked nature of these threats.

The United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (ISPPBES) released a report² in May 2019 on global biodiversity, which found 75% of terrestrial environments and 66% of marine environments have been

¹ Future Earth (2020) Our Future On Earth: <https://futureearth.org/publications/our-future-on-earth/>

² Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services 2019 report: <https://www.un.org/sustainabledevelopment/blog/2019/05/nature-decline-unprecedented-report/>

An Taisce is a membership-based charity | Join at www.antaisce.org/membership

Protecting Ireland's heritage, safeguarding its future

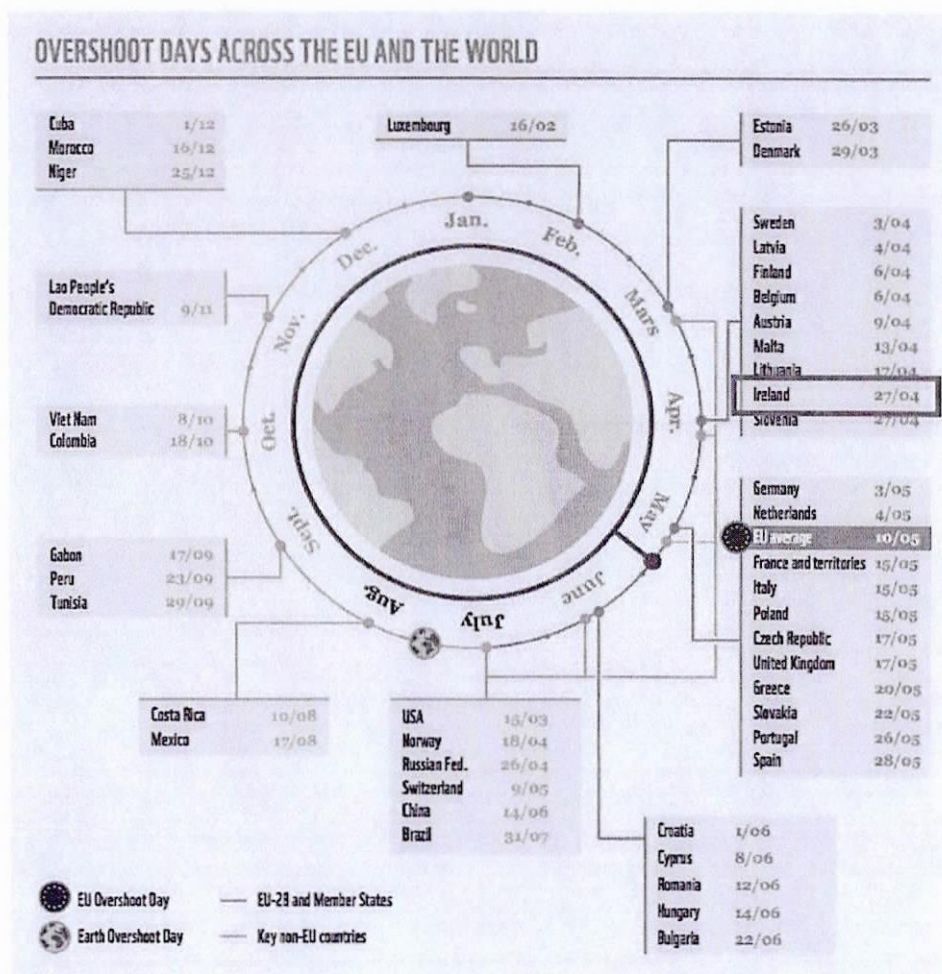
An Taisce – The National Trust for Ireland | Tailors' Hall, Back Lane, Dublin, D08 X2A3, Ireland | www.antaisce.org
+353 1 707 7076 | info@antaisce.org

Company Limited by Guarantee | Company 12469 | Charity CHY 4741 | Charity Regulator No. 20006358

Directors: Philip Kearney (Chair), Trish O'Connell (Vice-Chair), Eric Conroy (Treasurer), Stuart McCaul (Secretary), Nick Armstrong, Gary Freemantle, Hugh O'Reilly, Olivia Rogers, John Sweeney

“severely altered” by human activities. The report also found that one million of the planet’s approximately eight million animal and plant species are now facing the threat of extinction, many of them within coming decades.

Ireland is among the worst performing countries on climate action in Europe. We are facing accelerating biodiversity loss, and we have a transboundary resource consumption and trade impact, which is breaching planetary environmental footprints on a disproportionate per capita basis³. The following chart details the “Earth overshoot day” for a range of countries. The overshoot day measures the date each year upon which humanity would have used up as much from nature as the planet can renew in one year if everyone in the world had the same ecological footprint as the subject country. Ireland’s 2019 overshoot day fell on 27th April, a worse performance than the EU average.



³ WWF (2019) EU Overshoot Day, 10 May 2019: Living Beyond Nature’s Limits: https://www.footprintnetwork.org/content/uploads/2019/05/WWF_GFN_EU_Overshoot_Day_report.pdf

The onus is now on developed countries including Ireland to reduce greenhouse gas emissions by over 7% annually⁴ which is the level determined by the United Nations Environment Programme to avert catastrophic global heating, and to reverse biodiversity loss which is so evident in Ireland through continuing insect population decline.

The investment priorities for Ireland should therefore be:

1. Placing the health and wellbeing of communities at the heard of all decision-making in accordance with the principles set out in Sustainable Development Goal 11. This would include major initiatives in:
 - Energy efficiency;
 - Reduction in dependence on private car use;
 - Enhancing plant based food production in grains, fruits, vegetables pulses and nuts and other oil or protein producing plants; and
 - Large sale biodiversity enhancement including native woodlands
2. Prioritising the reduction of energy use and demand while increasing efficiency as a first principle.
3. Achieving the required targets for decarbonising electricity generation, heating and transport. Reduction in aviation, for which there is no sustainable mitigation, is also required.

Policy justification of overall Foynes to Attyfin dual carriageway project to serve projected Foynes Port traffic

This proposal is justified on the basis of the status of Foynes as part of the European TEN-T ports network, and accommodating port traffic. However, we submit that the continuation of the current bulk cargo traffic coming through Foynes has not been justified.

The EIAR states that:

"Shannon-Foynes Port is the largest bulk port in the country, handling approx., 20% of all seaborne trade in the State. The port's dominance in the dry-bulk sector is particularly pronounced, with a market share of around 63% in this sector. The National Ports Policy has, as a key strategic objective, the continued commercial development of Shannon-Foynes Port Company, and clearly identifies as a matter of reasonable priority, the improvement of the road and rail freight connections."

⁴ United Nations Environment Programme (2019) Emissions Gap Report 2019:
<https://wedocs.unep.org/bitstream/handle/20.500.11822/30797/EGR2019.pdf?sequence=1&isAllowed=y>

No breakdown has been provided on the current Foynes bulk traffic to justify either continued demand for cargo throughput, or outlining what increased traffic the proposed road is justified.

Ireland needs to:

- Eliminate imports of coal and petroleum to meet climate targets;
- Reduce imports of bulk products such as fertilizers, animal feed and timber to meet sustainable development objectives;
- Produce more grain rather than import it.

This would either eliminate or reduce current cargos coming through Foynes thereby removing the justification for the subject project.

If an increase in sustainable cargo throughput in Foyes can be modelled, what is proposed is a road investment measure only – there is no proposal for restoration of the currently unused Limerick to Foynes freight rail line. If there is a case for expanding throughput of freight at Foynes this should be based on rail transport and not road expansion.

Given the lack of rail access to Cork Port at Ringaskiddy, if there is a case for increased bulk imports, this should be accommodated in a port with rail access such as Waterford.

Article 41(2) of the TEN-T Regulations⁵ with regard to transport infrastructure requirements states that Member States shall ensure that: *"Maritime ports of the core network [...] shall be connected with the railway and road and, where possible, inland waterway transport infrastructure of the trans-European transport network by 31 December 2030, except where physical constraints prevent such connection."*

The Limerick-Foynes rail line is existent; it is a regional and national asset. The essence of Smarter Travel and sustainable transport is that lower-emission and lower environmental impact transport for freight as well as other transport demand should be maximised. In this case, there is a clear capacity to restore the rail freight line for use within an immediate time frame. This proposal fails to provide for this, proposing only road investment

There are lessons to be learned from the Celtic Tiger period's national motorway investment programme, which failed to upgrade the rail system to enhance capacity, speed and freight capacity, thereby creating unsustainable dependence on cars and road haulage vehicles.

⁵ REGULATION (EU) No 1315/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2013 on Union guidelines for the development of the trans-European transport network and repealing Decision No 661/2010/EU: <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A32013R1315>

Policy justification for bypassing N21 Adare through traffic with a motorway standard dual carriageway extending to Rathkeale

The need for removal of N21 through traffic in the historic centre of Adare is not in dispute. Equally, the unsustainable level of private car use been Counties Limerick and Kerry on the N21 corridor needs to be reduced in favour of emission-efficient buses.

However, instead of providing a sufficient capacity bypass such as already has been put in place for Rathkeale, what is proposed in the subject project is a 17.5km section of motorway-standard road, the scale of which has not been justified. The need for a new road to supersede the existing N21 west of Adare to Rathkeale has further not been justified.

However, the EIAR unjustifiably seeks to support what is an over-scaled bypass need on the basis of SmarterTravel: A Sustainable Transport Future (2009 – 2020)⁶, a national policy set out by the Department of Transport in 2009. It contains clear targets to stabilise the total kilometres travelled by the national car fleet at 2009 levels, for example, reducing the overall national figure for car based workplace travel from 65 % to 45% by 2020. It set out 49 specific actions with five key goals:

- i. to reduce overall travel demand;
- ii. to maximise efficiency of the transport network;
- iii. to reduce reliance on fossil fuels;
- iv. to reduce transport emissions; and
- v. to improve accessibility to transport.

Circular PSSP-4-2010 to all planning authorities determined that SmarterTravel relates to proper planning and sustainable development under Section 9(6) of the Planning & Development Act (PDA) 2000 and must therefore be incorporated into the specific policies and objectives of County Development Plans. Limerick City and County development plans have failed to do this. Investment aimed at increasing road vehicle use, whether cars or commercial vehicles or unsustainable port trade in fossil fuels or animal feed, would be contrary to the objectives of SmarterTravel.

Yet Section 2.2.2.5 of the subject EIAR references SmarterTravel in justifying this proposal:

"SmarterTravel, A Sustainable Transport Future (2009 – 2020) presents an overall policy framework for sustainable transport in Ireland. The policy sets out a vision, goals and targets to be achieved, and outlines 49 actions that form the basis for achieving a more sustainable transport future. The relevant parts of this policy are set out in the following chapters:

Chapter 4: Actions to Encourage Smarter Travel: 'The delivery of public transport, cycling and promotion of more sustainable travel patterns generally in many existing urban centres can only be achieved through retrofitting. We will require local

⁶ SmarterTravel: A Sustainable Transport Future (2009 – 2020):
<http://www.smartertravel.ie/content/smartertravel-policy-document>

authorities to prepare plans to retrofit areas towards creating sustainable neighbourhoods so that walking and cycling can be the best options for local trips, for example to reach local facilities such as shops and schools' (p. 34).

The proposed road development will indirectly support this action as it will result in the reduction of traffic through towns and villages along the N69 and N21. This will provide an opportunity for future improvements to pedestrian and cycle amenities to progress within these urban centres, whilst also providing greater reliability for road based public transport and bringing improvements to air quality for the communities within and around these centres.

Chapter 6: Actions to Improve the Efficiency of Motorised Transport '[...] remove bottlenecks, ease congestion and pressure in towns and villages and provide the necessary infrastructural links to support the National Spatial Strategy' (p. 51).

The proposed road development aligns with this action through reduction of congestion and improved access within Adare and other towns and villages along the N69."

This does not address the overarching objective to reduce car use and dependence and enhance cycling. Any further road investment nationally should be restricted to urban bypasses. Instead there has been a deliberate policy of failing to build bypass loops around towns such as Adare, Newcastlewest, Buttevant, and Charleville in order to justify the building of motorways and dual carriageways. This project is an example of what occurs when road construction engineers are allowed to direct infrastructure investment, resulting in the misdirection of resources into heavy engineering road projects.

This proposal is not linked to any sustainable transport measures and must be deemed to fall thereby.

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

Yours sincerely,

Ian Lumley
Advocacy Officer
An Taisce – The National Trust for Ireland