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JAMES & AOIFE BRESTIN



25/03/2022

Draft Clare County Development Plan 2023-2029,
Planning Department,
Clare County Council,
New Road,
Ennis,
Co. Clare V95 DXP2
25/03/2022

Ref: Submission to Clare County Council in relation to Draft Clare County Development Plan 2023 – 2029

Dear Sir/Madam,

We wish to make a submission in relation to create "A new interchange on the M18 at Quin Road Ennis" as noted in Section 1.1.2.9.1 of the above noted Draft County Development Plan.

As residents of Hogan's Way Any changes to the R469 / M18 would have a significant impact on our area. We strongly believe that this proposal should be removed from the development plan based on:

1. Significant impact on Residents of Hogan's Way
2. Experience with Construction and Non-completion of N18 Ennis Bypass
3. Incompatible with design of M18
4. Adequate Access to M18 already in place
5. Better Alternatives at lower cost and lower local impact

Detailed commentary on each of the above are contained in the attached report.

We consider that any one of the above are sufficient reason to have the proposal removed from the County Development Plan, combined they make failure to remove the proposal very hard to justify.

Yours Sincerely,

James Brestin
Aoife Brestin.

Significant Impact on Residents of Hogan's Way

The addition of an interchange / junction between M18 and R469 would have a significant impact on the residents of Ballaghboy, most particularly the residents of Hogan's way.

Attachment # 1 superimposes the junction configuration from Junction 12 on the M18/R469 location, a roundabout on the Quin side of the would impact on one of the existing residences and would result in a very short distance between said roundabout and the Hogan's way junction.

The Noise levels experienced by the Hogan's Way residents would significantly increase (see comments below about Clare County Councils failure to adequately address similar issues in the past).

The existing Public Walkways / Farm Access Roads to the North West, North East and South East of the current M18 / R469 would be significantly impacted.

Experience with Construction and Non completion of N18 Ennis Bypass

In 2007 Ballaghboy residents wrote to Clare County Council (see attachment #2) bringing their attention to the fact that road noise readings at local residences had increased to a peak of 49dBA before the bypass opened to and readings of 67dBA following opening of the new road. We asked that Clare County Council ensure noise mitigation measures would be put in place prior to completion of the works on the M18.

Clare County Councils response to this matter (see attachment #3) was to state that the contractor GAMA would be carrying out tree planting on the embankments, works which were never completed and which as far as we are aware were never followed up on by Clare County Council.

Clare County Councils response was effectively "hand washing" stating that the impact of the M18 or completion of works to mitigate such impacts were not Clare County Council's responsibility.

We would expect that any modifications to the M18 would have to be carried out by TII (same organisation that was responsible for the original M18 works and that Clare County Council would take a similar "not our responsibility" approach to the impact of such works.

In summary we have no faith in Clare County Councils interest in ensuring any such proposed works would not impact on local residents.

Incompatible with design of M18

It can reasonably be assumed that the design of the M18 Ennis Bypass in the early 2000's future-proofed the scheme based on predicted population growth and demographics. It is surprising that only 15 years after opening the bypass councillors are proposing to make significant changes to the scheme, effectively undermining the design commissioned by TII (or their predecessors the NRA).

The M18 Motorway extends from Junction 9 (Shannon) to junction 18 (M6 Interchange).

If junction 18 is excluded (this is a Motorway to Motorway interchange) of the remaining 9 interchanges (junctions) only 2 (J10 Newmarket on Fergus and J 14 Barefield) have been designed with the Motorway passing over the connecting R road, if 80% of the junctions are designed in this manner creating an additional junction at the R469 with the Motorway over the R469 must be considered as an "afterthought" and poorer design.

We would also question whether the introduction of an additional junction at the R469 is compatible with TII design recommendations, currently the shortest distance between 2 adjacent junctions on the M18 is 2.6km (junction 10 → 11) a junction at the R469 would only be 1.5kmm from Junction 12 we believe that this would raise safety concerns with TII.

Adequate Access to M18 already in place

There are currently 3 junctions on the M18 servicing the greater Ennis area (see attachment #4)

Junction 12

- Access from Quin Road via Doora
- Access from West Clare and south parts of Ennis Town via N68
- Access from East side Ennis Town and Ballaghboy area via "Old Bog Road"

Junction 13

- Access from Tulla Road
- Access for North and West parts of Ennis Town via R352 (Tulla Road)

Junction 14

- Access from North of Ennis Town

To add an additional junction at the R469 would have limited benefit and small impact on travel times for users of the M18

Better Alternatives at lower cost and lower local impact

Following review of the area by a Chartered Engineer there would appear to be at least 4 viable (less expensive, quicker and less impactful on residents) alternatives, these are suggested in Attachments #5a → 5d.

The simplest and least expensive would be to upgrade the "Old Bog Road" to same specification as the R469 possibly with a roundabout at the junction with the R469.

The other 3 alternatives all utilise the existing roundabout on the N85 (currently providing access to Clarecastle and the surrounds.

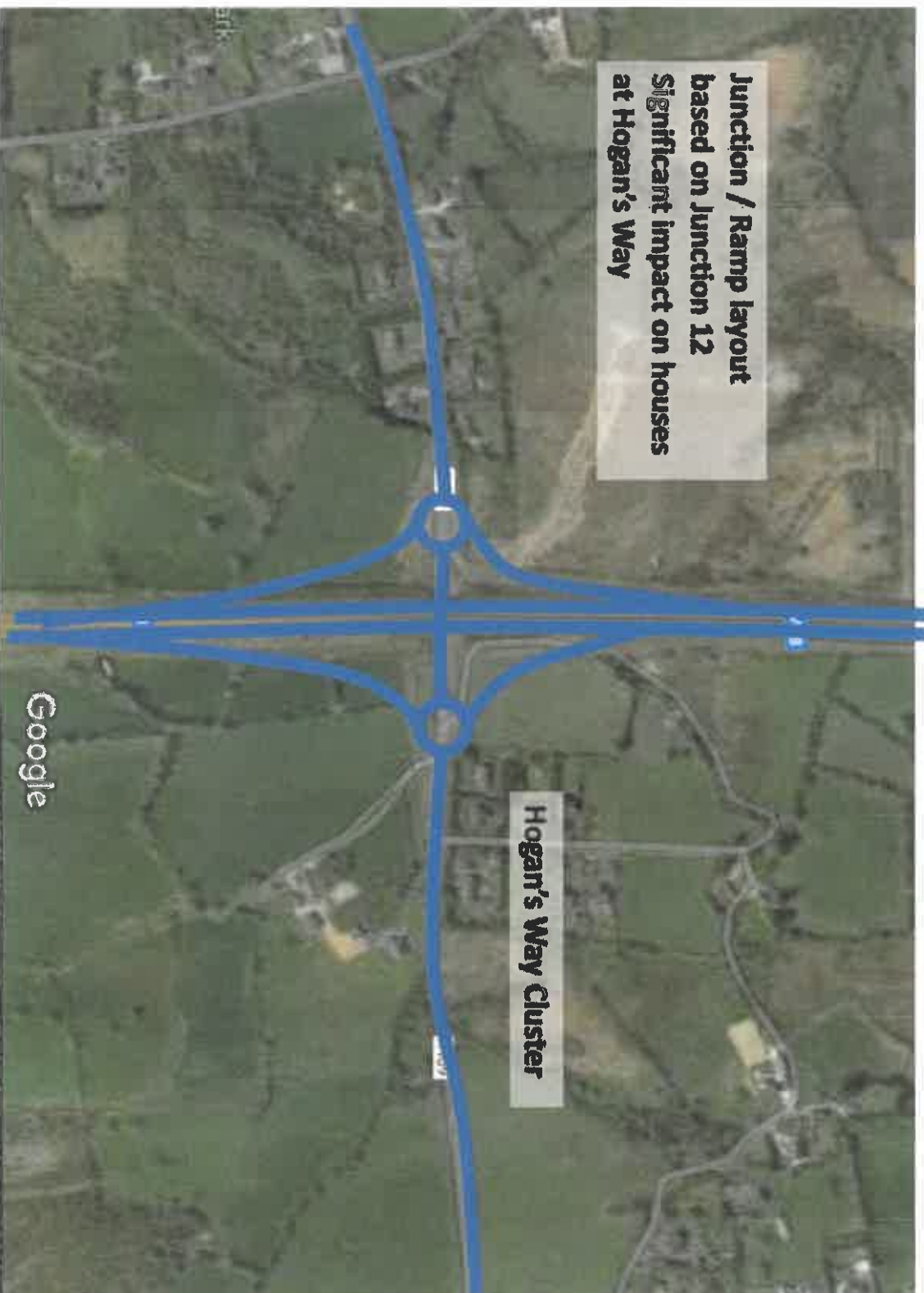
In addition to the above benefits any of these alternatives would be within the remit of Clare County Council and would not necessitate approval of TII.

Impact on Local Walkways

Local public access to the East of the M18, both North and south of the R469, would be impacted by the proposed changes.

These are well used public amenities and proved to be a significant benefit during the Covid restrictions.

Attachment # 2 – Letter to Clare County Council re impact of M18



Attachment # 2 – Letter to Clare County Council re impact of M18



1st February 2007

Ennis County Council,

Ref: Increase in Noise Levels due to opening of Ennis By-Pass

Dear Sir,

As a result of the recent opening of the first section of the Ennis By-Pass we are now experiencing ongoing noise levels far in excess of those experienced prior to the road being opened.

Having observed progress to completion of the road we had assumed that the works of tree planting, presumably to reduce the amount of noise transmission from the road, evident along some of the local sections of the road would be continued along the length of the road where the noise impacts on our residences.

We are now however concerned to not that there is no evidence of this planting being continued to reduce the impact of noise on our residences.

We can only assume that as the remaining access /exit points on the by-pass are opened in the coming months the impact of noise will increase as the numbers using the road increases.

On the evening of Jan 6th noise monitoring was carried out and the peak noise level was noted as 49 dBA, the exercise was carried out at the same location on 1st Feb with the maximum noise levels showing an increase to 67 dBA (note both readings were taken at approx 8pm).

We hereby request that Clare County Council confirm that there will be measures put in place, prior to completion of the works on the new road, to reduce the impact of road noise at our residence. This being in keeping with what has been done at other locations along the road.

Should you wish to discuss your proposals with us we would be gladly oblige.

Yours truly,

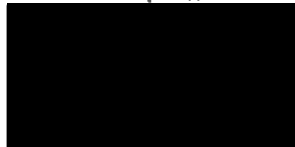
Attachment # 3 –Clare County Councils response to Noise issue from M18



CLARE COUNTY COUNCIL
COMHAIRLE CONTAE AN CHLÁIR

Our Ref: PM/14 00/OUT5008

27 February 2007



Dear Mr Quinn

**M18 Ennis Bypass
Increase in Noise Levels**

We are writing in reply to your letter dated 01 February 2007 regarding the above matter. We can confirm that the Contractor, Gama Strabeg Construction Ltd will be carrying out some tree planting on road embankments in the vicinity of the Quin Road. He has already carried out some of this work.

There are no plans to install either noise fences or noise bunds at these locations. Such measures were not contemplated in the Compulsory Purchase Order which was confirmed in July 2001 and they are not included in the Design and Build Contract.

Yours faithfully

Paul Moroney
on behalf of Clare County Council

**M18 Ennis Bypass
Project Office
Clare County Council
Tulla Road
Ennis
County Clare**

**M18 Seachóid na hInse
Oifig Thioraidt
Comhairle Contae
an Chláir
Bothar na Tulloir
Inis
Contae an Chláir**

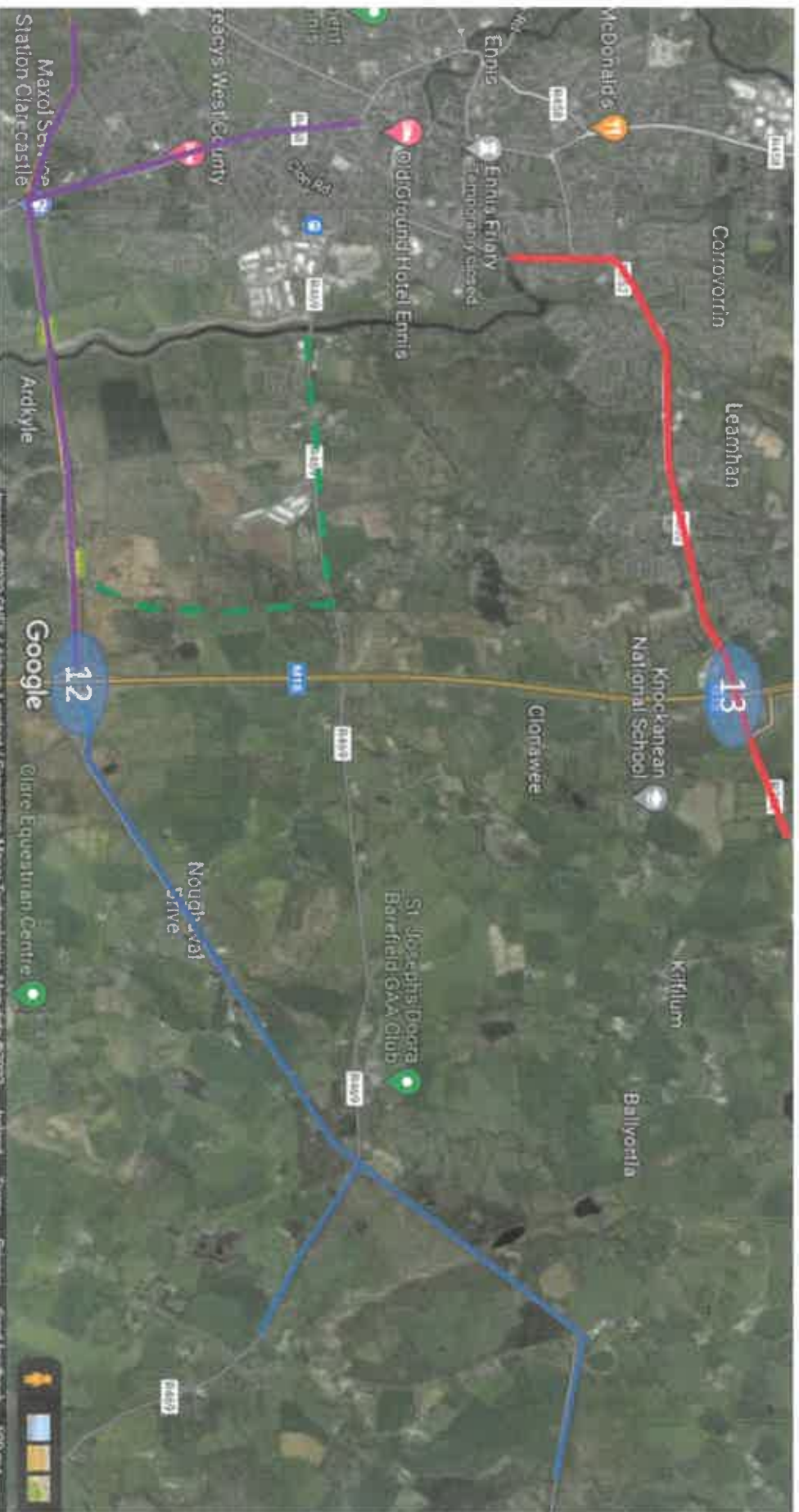
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Director of Services & Events Engineer**

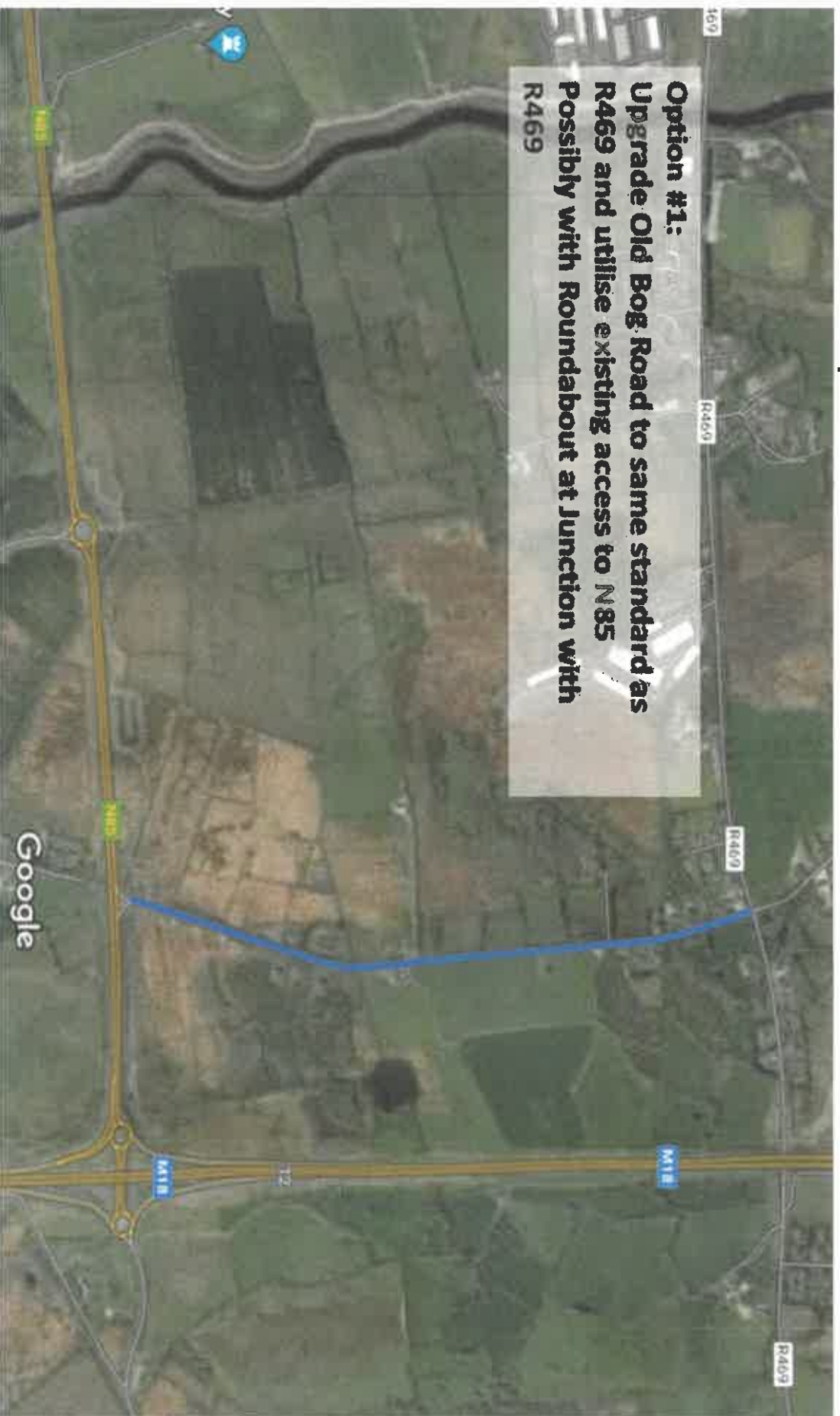


**Caring for
Clare's Environment**

Attachment # 4 – Existing access to M18 from greater Ennis Town area



Attachment # 5a – Alternate option #1



Attachment # 5b – Alternate option #2

**Option #2:
New Road linking R469 to existing Roundabout
on N85
Possibly with Roundabout at Junction with
R469**



Attachment # 5c – Alternate option #3



Attachment # 5d – Alternate option #4

