



Safety Before LNG  
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## **Safety before LNG**

*Protecting the Shannon Estuary and its people*

5 November 2009

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

By email only to [bord@pleanala.ie](mailto:bord@pleanala.ie) [k.somers@pleanala.ie](mailto:k.somers@pleanala.ie)

Re: BP.CH3111: Submission on 2009 compulsory purchase application by Kerry County Council for L-1010 Road Improvement Scheme from Tarbert / Ballylongford Landbank to Tarbert for the proposed Shannon LNG project.

Dear Sir,

I am writing to appeal to An Bord Pleanála to take on board the issues raised in this letter before it decides whether or not to confirm the Compulsory Acquisition Order by Kerry County Council to widen the L-1010 road from Tarbert town to the proposed Shannon LNG terminal site.

The 'Safety Before LNG' group represents people from both Kilcolgan and the wider community and is advocating responsible strategic siting of LNG terminals in areas which do not put people's health and safety in danger. I am equally PRO of the Kilcolgan Residents Association which has members directly effected by this CAO process.

Regarding the Confirmation of compulsory purchase order where there are no objections Section 216 of the Planning and Development Act 2000 states the following:

*"216.—(1) Where a compulsory purchase order is made in respect of the acquisition of land by a local authority in accordance with any of the enactments referred to in [section 214](#) (1) and—*

*(a) no objections are received by the Board or the local authority, as the case may be, within the period provided for making objections,*

*(b) any objection received is subsequently withdrawn at any time before the Board makes its decision, or*

*(c) the Board is of opinion that any objection received relates exclusively to matters which can be dealt with by a property arbitrator, the Board shall, where appropriate, inform the local authority and the local authority shall, as soon as may be, confirm the order with or without modification, or it may refuse to confirm the order.”*

We are aware that there were two direct objections to the CAO to Kerry County Council - one by Adam Kearney and one by Mike and Maura Mulvihill and that these have now been withdrawn.

However, as detailed below, several other objections to the proposed road works (including from myself) were already raised in the submissions on the LNG terminal application itself<sup>1</sup>, both in written form and in verbal form<sup>2</sup> direct to An Bord Pleanála at the oral hearing in Tralee from 21<sup>st</sup>-30<sup>th</sup> January 2008 and none of these have been withdrawn.

As we consider the road improvement works to be an integral part of the Shannon LNG project (and this was even acknowledged in the conditions 8, 9, 11 and 36 of the planning permission given by An Bord Pleanála for PA0002) and because project splitting is illegal then we are of the opinion that these objections to the road works are still open objections which cannot be dealt with by a property arbitrator and which should therefore be dealt with in this compulsory acquisition confirmation request CH.3111 by Kerry county council.

Indeed, Mr. Sheehy of Kerry County Council confirmed on day 6 of the oral hearing<sup>3</sup> that the road would not be upgraded if the Shannon LNG project did not go ahead and that Shannon LNG would pay for it all.

Mr. Frank Hartnett, senior executive engineer with Kerry County Council stated on the same date:

*“Just to clarify that the upgrade of the road is currently under the Part 8 process and it went on display on 16th January and submissions will be taken up until 29th February. So, if anyone has any other issues in relation to the upgrade of the road from Tarbert all the way out to the gate into this development, you know, they can make the submission directly to Kerry County Council.”<sup>4</sup>*

We therefore consider that our objections to the road improvement works have not yet been dealt with. We did not make any other submissions to Kerry County Council on “any other issues” as suggested by Mr. Hartnett and now ask you to take them into consideration.

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<sup>1</sup> <http://www.pleanala.ie/casenum/PA0002.htm>

<sup>2</sup> day 6 of oral hearing transcripts from page 222

<sup>3</sup> day 6 of oral hearing transcripts pages 260-261

<sup>4</sup> day 6 of oral hearing transcripts page 158

We are objecting to this compulsory purchase application in its entirety for the following reasons:

1. On health and safety grounds the chosen route is not the optimal choice because a safer alternative route which would bypass Tarbert town altogether is what is needed to prevent Tarbert town becoming a death trap.
2. Section 5.4 of the Kerry County Council Manager's report of 20<sup>th</sup> November 2007 on the Shannon LNG terminal application noted on page 20 regarding the option of connecting to the R551 main Tarbert - Ballylongford road:

*"This would require the construction of a new road for approx. 3kms. It would cause severance of land holdings and almost certainly require a lengthy CPO Process. If constructed, this linkage would only serve the proposed LNG development and would not benefit any lands to the East which may be developed in the future."*

This is not true because it does not consider the possibility of widening another existing road to the R551 onto the N69.

In addition, the Council's response does not deal with the main concern of bypassing the town of Tarbert which is not achieved by the chosen CPO route and which was raised continuously throughout day 6 of the oral hearing into the Shannon LNG terminal project.

3. Page 21 of the Manager's report and table 6.11 of the PA0002 Shannon LNG EIS volume 2 shows that the peak traffic flow for the coast road indicates an increase to 455 vehicles per hour, up from 35 vehicles per hour without the development. But all that the council and Shannon LNG suggest is necessary is to have an upgrading of the road to a standard capable of accommodating two passing HGVs.

There is no account taken of the need for a separate cycle and footpath for pedestrians.

There is also no account taken of the need to protect the safety of people due to the cumulative effects on people in the middle of the town of Tarbert (without a bypass), for the 700-pupil school, access to two graveyards and to the primary school and Church on the N69 (with 513 vehicles per hour at peak time).

4. No costing has been made of the alternative choices, the only criteria considered being the ease of CPO process - a time-constraint criteria as opposed to a safety criteria.

5. The construction period is predicted to last a total of 4 years at least (page 226 of day 6 of oral hearing into LNG terminal) but this will be longer if only 1 or 2 tanks are built first as predicted and allowed by condition 3 and can extend in a phased basis for up to 10 years (condition 2).
6. The Parent's Association of Tarbert Comprehensive School pointed out that of the in excess of 600 pupils, many walk the short 500 metres from Tarbert town to the school, so there is a danger posed to children in the area crossing roads not covered by traffic management of 20 minutes interdiction of HGVs before school.

7. Tarbert Development Association stated in its submission to the LNG terminal application:

*"Traffic Management through Tarbert. Due to the very heavy volume of traffic already using Bridewell Street, we in Tarbert Development feel that the only way to solve the problems that most certainly will arise with extra construction traffic is, if Kerry County Council (KCC) build a relief road through the Market, as suggested in the Tarbert Local Area Plan (2006-2012)."*

The Tarbert Development Association therefore agree with us that a relief road needs to be built. However, a relief road in the centre of the town will not reduce the traffic density within the centre. A relief road is needed outside the town centre that bypasses the town altogether.

8. Eamon McElligott, a quarry operator who supplied stone for road construction on the proposed site for Roadbridge Contractors, in his submission to the Shannon LNG application stated:

*"in my experience I find the town of Tarbert has a severe traffic congestion problem especially at Ferry unloading times at the T. junction"*

9. Tarbert National School principal, Mairéad Uí Scannaill, complained in her submission to the Shannon LNG application on November 2007:

*"I note that on the EIS Non Technical Summary, Volume 1 page 16 reference is made to Tarbert Comprehensive School only. In the interest of the safety of our pupils, I propose that the relevant sentence should also include Tarbert National School, on the Listowel Road".*

Condition 9 of the planning permission proposes traffic mitigation measures for the Comprehensive School only and it is abundantly clear that a bypass of the town is now the only solution.

10. Kerry county council recently rezoned over 700 additional acres of lands from East of the proposed LNG terminal to Tarbert to Industrial bringing the total size of



industrialised zoned land between Tarbert and Ballylongford to **1,300 acres**.

The traffic density has only been calculated for the proposed LNG terminal. The additional recent industrial rezoning will surely lead to increased density of traffic through the town over the years and sustainable development requires a long-term view of road development in the area to be taken. Condition 36 allows for the Council to recover money from the developer for these road improvement works.

11. The lands were rezoned as part of the proposed amendments to the county development plan 2009-15 (amendment number 158).

The Strategic Environmental Assessment (SEA) for this amendment noted:

*“This amendment recommends that an area of land east of Tarbert is zoned industrial (Map No. 9). This area bounds Glencloosag Bay which forms part of the Shannon SAC (code 002165) Special Area of Conservation (SAC) under the Habitats Regulations. This amendment does not mention the requirements to protect the Lower River Shannon SAC. The development of this area for industrial purposes may, if uncontrolled, result in a visual impact, impacts on the ecology of the area and depending upon the types of development, air quality. However, there are other objectives in the Plan particularly those relating to flooding (EN 11-58 to EN 11-67), the natural environment, EN 11-22 (Requirement for an Appropriate Assessment) will help mitigate against the environmental objectives.”*

12. The precedent of the GA0004 Shell Pipeline decision by An Bord Pleanála<sup>5</sup> of November 2<sup>nd</sup> 2009 where for the first time the consequences of an accident are being considered and not only the probability of an accident now needs to be considered with this compulsory acquisition confirmation request.

The Bord found as unacceptable in its decision letter in 2(c)

*“the impacts on the local community during the construction and operational phases of the development which would seriously injure the residential amenities of the area”.*

We also noted in 3(c) with great interest the appropriate standard against which that major hazard pipeline would now be assessed:

*“the routing distance for proximity to a dwelling shall not be less than the appropriate hazard distance for the pipeline in the event of a pipeline failure. The appropriate hazard distance shall be calculated for the specific pipeline proposed such that a person at that distance from the pipeline would be safe in the event of a failure of the pipeline”.*

The decision letter goes on to state in part (d) on page 3:

*“In order to eliminate any doubt please note that all failure modes should be included including the possibility of third party intentional damage”*

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<sup>5</sup> <http://www.pleanala.ie/casenum/GA0004.htm>

In part I of page 3 the Bord requests :

*“details of the hazard distances, building burn distances and escape distances in contours for the entire pipeline”*

LNG expert Dr. Jerry Havens, in his submission to the Shannon LNG application noted:

*“If an LNGC were to be attacked in the proximity of the shoreline, either while docked at the terminal or in passage in or out of the estuary, and cascading failures of the ship’s containments were to occur, it could result in a pool fire on water with magnitude beyond anything that has been experienced to my knowledge, and in my opinion could have the potential to put people in harm’s way to a distance of approximately three miles from the ship. I have testified repeatedly that I believe that the parties that live in areas where this threat could affect them deserve to have a rational, science-based determination made of the potential for such occurrences, no matter how unlikely they may be considered.*

The conclusion therefore is that zoning 1,300 acres of lands industrial surrounding a top-tier Seveso II LNG terminal, the most sizeable hazard in Ireland, where people will live in harm’s way up to 3 miles from the site is unacceptable. There has not even been an initial evacuation plan proposed or assessed and we now request that the escape distances be integrated into the planning for the road infrastructure which would not include heading towards the population centre of Tarbert town.

13. Landowners who signed the consent form to Shannon LNG for the laying of a gas pipeline through their properties in order to avoid a compulsory acquisition of their lands had to agree the following on the first page of the consent form:

*“I/We also hereby consent to, and agree not to object to, a planning application to An Bord Pleanála by Shannon LNG which application shall include reference to a corridor of 50 metres either side of the proposed pipeline.”*

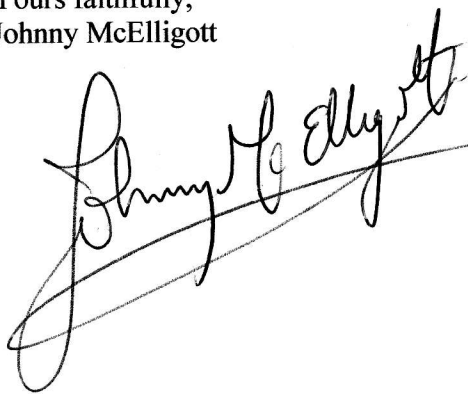
We believe that this has unethically prevented the landowners now confronted by a CAO of their lands for the road widening to effectively participate in this current CAO process and that that the Board should act in their interests in evaluating the effects of this CAO on their residential amenity.

14. The Shannon LNG project has still not obtained full development consent. It still requires at the very least a Foreshore Licence, an EPA licence and a CER licence. We therefore consider it premature to give permission for compulsory acquisition of lands at this stage for a project that might never see the light of day.

Finally, we understand from Section 218 of the Planning and Development Act 2000 that An Bord Pleanála has discretion to annul this compulsory purchase order without holding an oral hearing if it sees fit because we have now brought it unequivocally to your attention before you make your final decision that there are serious orderly planning issues that have not been dealt with in the application by Kerry County Council. We beg you to apply prudence to your decision.

We await your feedback.

Yours faithfully,  
Johnny McElligott

A handwritten signature in black ink, appearing to read 'Johnny McElligott', written over a horizontal line.

Ballycullane Lower,  
Glin,  
County Limerick.  
068 36236  
087 6765891  
tmoore1@eircom.net

AN BORD PLEANÁLA	
TIME _____	BY <u>Reg</u>
14 NOV 2007	
LTR-DATED _____	FROM <u>CC</u>
PL _____	

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

11 - 11 - 2007

Dear Sir,

I am writing to you in relation to the proposed development by Shannon LNG at Ralappane and Kilcolgan Lower, Tarbert, County Kerry. On behalf of the parents of students attending Tarbert Comprehensive School, I have been asked to express their concerns in relation to the proposed development and the safe transfer of students to and from school.

Tarbert Comprehensive School is located on the first 500 metres of the coastal road between Tarbert and Ballylongford which is the main access route to the proposed development by Shannon LNG. This is the coastal route, a narrow and winding road and one of two roads that link the two villages. Up to now this road was utilised mainly by the staff and pupils attending the school and a small number of local residents. The second road that links the two villages runs parallel to the coastal route is a significantly better road and hence caters for the majority of the traffic commuting between Tarbert and Ballylongford.

The school has in excess of 600 pupils, many of whom walk the short 500 metres distance from Tarbert village to the school. The majority are transported by bus from the local catchment area and the balance, who are inside the three mile area (and not automatically entitled to bus transport), are dropped off and collected by parents with cars. As a result the traffic on school days during 8:40 am and 9:00 am and 3:45 pm and 4:10 pm (2:00 on Wednesdays) is extremely busy with the transfer of students. Up to now the situation was manageable and safe due to negligible additional local traffic and with the majority of traffic using the alternative road linking Tarbert and Ballylongford.

However if the proposed development by Shannon LNG was to advance to the construction stage, we as parents fear the volume and scale of traffic would increase significantly. Such a transformation would ultimately impact on the safety of pupils during school drop off and collection times.

Parents are not expressing these opinions to hinder the proposed development but rather to highlight a potential danger. We feel a safety audit would be the first step in relation to the situation and may help in creating a safe and workable solution in the event of planning being granted.

Yours sincerely,



Tom Moore.

Chairman of Parents Association, Tarbert Comprehensive School.



# Tarbert Development Association

Tarbert Co Kerry

www.tarbert.ie.

Tel: 068 - 36116  
Mobile: 086 - 8498638  
E-mail: [joanmurphy@eircom.net](mailto:joanmurphy@eircom.net).

To: The Secretary  
An Bord Pleanála.

AN BORD PLEANÁLA	
TIME	BY <i>Res</i>
14 NOV 2007	
LTR-DATED	FROM <i>CC</i>
PL	

**Re: Proposed Liquefied Natural Gas (LNG) Regasification Terminal on the Shannon Estuary**

A Chara

Tarbert Development Association (TDA) have for the past 40 + years campaigned for the development of a marine based industry on the Shannon Development Lands on the southern shore of the Shannon Estuary. The proposal by Shannon LNG to build an LNG regasification Terminal on this site would be a very welcome development provided all work on this site is consistent with proper planning. We do have a number of concerns which we hope you can address at the planning stage in relation to the following:-

- (a) **Safety and welfare of the workers and those living in the vicinity of the plant.** As LNG storage and regasification is classified as an 'upper tier' establishment under the Seveso regulations 2006 it is essential that all necessary precautions, using the most up-to-date technologies, are put in place to secure the safety of all.
- (b) **Traffic Management through Tarbert.** Due to the very heavy volume of traffic already using Bridewell Street, we in Tarbert Development feel that the only way to solve the problems that most certainly will arise with extra construction traffic is, if Kerry County Council (KCC) build a relief road through the Market, as suggested in Tarbert Local Area Plan (2006 - 2012).
- (c) **Upgrade of the Tarbert - Ballylongford Coast Road.** We feel that KCC must immediately commence the upgrade of the Coast Road so as to facilitate the heavy truck traffic that will use this road should construction begin.

- (d) **Safety of School Going Children.** We note in the E.I.S. that no truck traffic using the site will be allowed pass the Comprehensive School for 20 mins before and 10 mins after opening and closing times of the school. We welcome this but would ask that the same consideration be given to Tarbert National School on the Listowel Road.
- (e) **Heritage.** Should planning permission be granted we need assurance that great care is taken during the construction stage to ensure that no item of archaeological, architectural or cultural heritage is damaged or destroyed by the actions of Shannon LNG or their sub-contractors?
- (f) **Gas Pipeline.** We request that during the construction of the gas pipeline that spurs would be put in place to facilitate the possibility of supplying gas to Tarbert, Ballylongford, Listowel etc at some future date.
- (g) **Power Lines.** That a condition of planning would be that no extra pylons would be built to carry electricity to the site. This means that the cables would go underground.
- (h) **Support for Local Communities.** That Shannon LNG would support local communities and that Tarbert Development Association would continue to be recognised by them as the appropriate body to represent the community of Tarbert.

Should there be an oral hearing in relation to this planning application I request the right to speak, on behalf of the Association, at that hearing.

*Joan Murphy*  
Joan Murphy (Chairperson TDA)

AN BORD PLEANÁLA	
TIME _____	BY _____
14 NOV 2007	
LTR-DATED _____	FROM _____
PL _____	

Eamon McElligott  
Kilcolman  
Asdee  
Listowel  
Co. Kerry

Phone: 068 41166  
Mobile: 087 2263780

An Bord Pleanála  
64 Marlborough Street  
Dublin 1

15<sup>th</sup> November 2007

**Ref: Shannon LNG Terminal**  
**Kilcolgan Lower, Ballylongford, Co. Kerry**

<b>AN BORD PLEANÁLA</b>	
TIME _____	BY _____
<b>16 NOV 2007</b>	
LTR-DATED _____	FROM _____
PL _____	

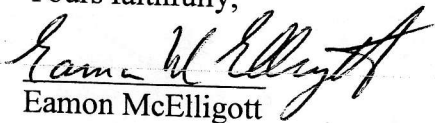
**To Whom It Concerns**

I Eamon McElligott operate a quarry at Larha, Asdee which forms part of the parish of Ballylongford. In this quarry operation I employ up to twenty people at any one time. The quarry produces a very high quality stone. During the past year we supplied stone for road construction on the proposed site for Roadbridge Contractors over North Kerry and West Limerick for the past thirty years and in my experience I find the town of Tarbert has a severe traffic congestion problem especially at Ferry unloading times at the T. Junction. This construction will increase the traffic substantially. I propose that some of the construction traffic should be allowed travel through the village of Ballylongford as I did when supplying stone for the construction of the road earlier this year. My proposal will alleviate traffic congestion in the town of Tarbert at Ferry arrivals and departures and at school time. Please find enclosed map outlining my proposed route plan through Ballylongford. ( **Proposed Route** - - - - **Shorter Route** → )

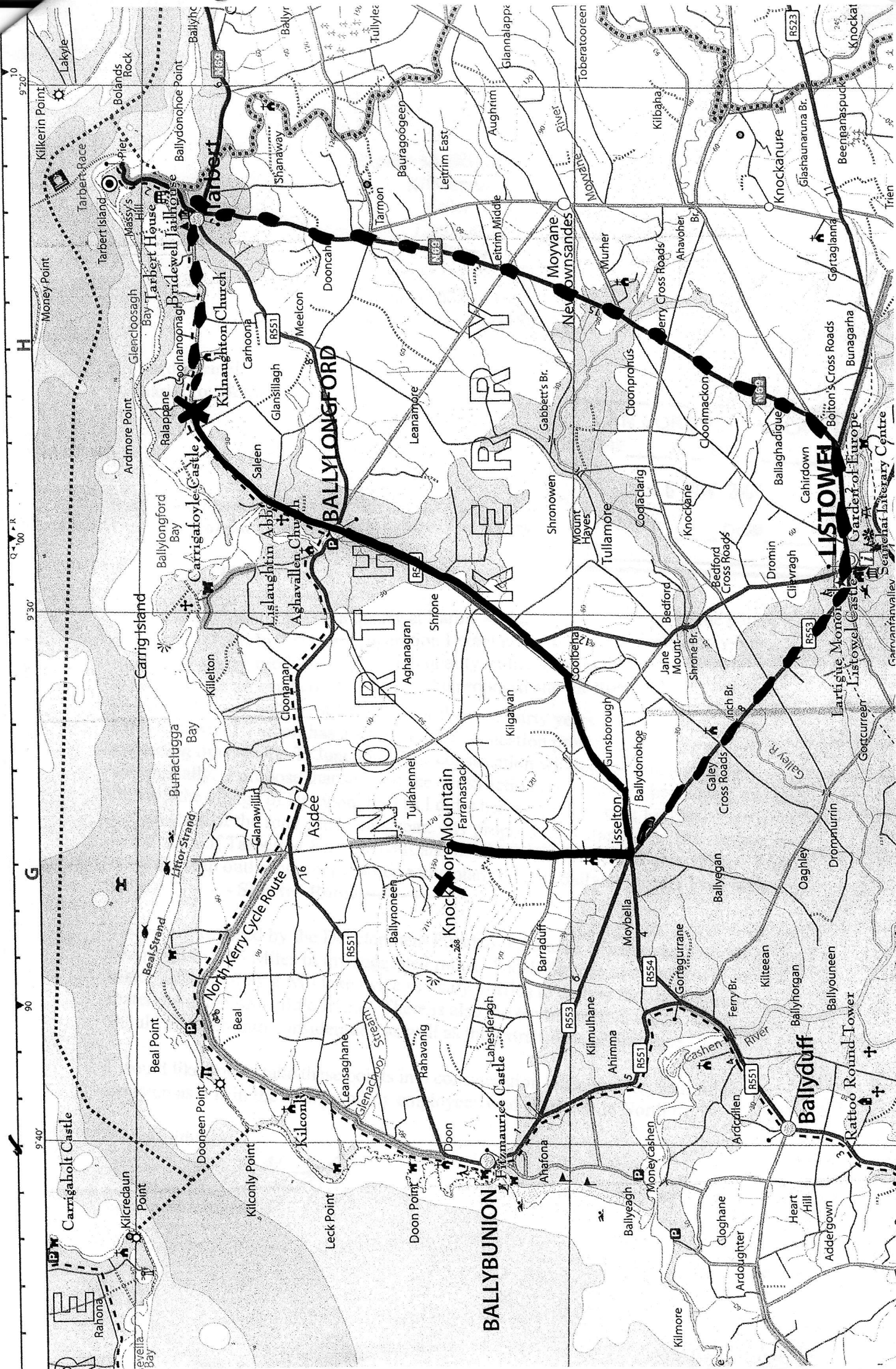
The route proposed by the Development Plan has a distance of just over 20 miles compared to 9.15 Miles in my suggested route. The difference in mileage will have a major cost factor as it will take twice as many Lorries to deliver the same amount of materials in the same time frame. There is also the environmental aspect which should be taken into consideration as well as the extra traffic on the route.

I would like you to take these points into consideration when making your final decision as it is in the interest of my employees who all reside in North Kerry.

Yours faithfully,

  
Eamon McElligott







**Scoil Náisiúnta Tairbeart.**

**Tairbeart,  
Lios Tuathail,  
Co. Chiarraí.**

**Email tarbertnsa.ias@eircom.net 068 36282**

**Roll No. 187050**

**Tarbert,  
Listowel,  
Co. Kerry.**

**13 – 11 – '07**

**Dear Sir/Madam,**

**Re PROPOSED LNG Regasification Terminal on  
the Shannon Estuary**

**I note that on the EIS Non Technical Summary, Volume 1 page 16  
reference is made to Tarbert Comprehensive School only. In the  
interest of the safety of our pupils, I propose that the relevant  
sentence should also include Tarbert National School, on the Listowel  
Road.**

**I trust that the safety of our pupils will be taken in  
to consideration in your deliberations.**


**Le gach dea-ghuí,**

*M. Uí Scannail*

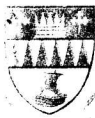
**Mairéad Uí Scannail**

**Príomhoide**

AN BORD PLEANÁLA	
TIME _____	BY _____
15 NOV 2007	
LTR-DATED _____	FROM _____
PL _____	

 Oifig Bainisteoir an Chontae

Comhairle Contae Chiarraí,  
Aras an Chontae,  
Trá Lí, Co. Chiarraí.



COMHAIRLE CONTAE CHIARRAÍ  
KERRY COUNTY COUNCIL

*Copy for of the 17th*  
*Gen M*  
*LNG file*  
County Manager's Office

Kerry County Council,  
County Buildings,  
Tralee, Co. Kerry.

Guthán | Tel 066 7183500 Faics | Fax 066 7122466 Rphost | Email [manager@kerrycoco.ie](mailto:manager@kerrycoco.ie) Suíomh | Web [www.kerrycoco.ie](http://www.kerrycoco.ie)

20<sup>th</sup> November, 2007

**Chuig: M. Healy-Rae, Mèara Chontae Chiarraí.**  
**Chuig: Gach Ball de Chomhairle Chontae Chiarraí**

**Àbhar/Subject: Planning and Development (Strategic Infrastructure) Act 2006**  
**Shannon LNG – Proposed LNG Terminal for Shannon Estuary.**

Dear Mayor and Councillors,

I refer to previous correspondence issued in respect of this matter.

This is the first such development to come before Kerry County Council under the Strategic Infrastructure Act 2006.

The Act provides an opportunity for Members to have their views on an application taken into consideration by the Board in making its determination.

Because of the nature and scale of this project, the Members are advised to prepare, in advance of that meeting, a clear and concise written statement of the views they will be expressing at the meeting in order that they can be incorporated into the meetings administrator's record. This is to ensure that detailed, technical or otherwise substantive points can be incorporated accurately for transmission to the Board.

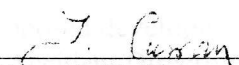
If the members do not choose to submit such statement, a concise and brief summary of their views, as expressed at the meeting and recorded by the meetings administrator will be submitted to the Board.

The meetings administrator's record will, therefore, be a mixture of the specific points raised by members in their written statements and a brief summary of the views expressed at the meetings by those members who did not submit written statements.

Accordingly, three levels of information will be forwarded to the Board.

- The views of the Authority – The Manager's Report
- The views of the Council – the resolution and any recommendations
- The views of individual members.

Members are also reminded that they are entitled as individuals to make detailed submissions or observations in relation to the proposed development to the Board.

  
T. O'Curraín/T. Curran,  
Bainisteoir Contae/County Manager

## **1.0 Introduction**

### **1.1 Legal Context**

This manager's report has been prepared in accordance with the provisions of Section 37E(4) of the Planning and Development Act 2000 as inserted by section 3 of the Local Government (Strategic Infrastructure) Act 2006.

### **1.2 Application Details**

**Applicant: Shannon LNG Ltd.**

**Address: Clieveragh Business Park, Listowel.**

#### **Development Description:**

A liquefied natural gas (LNG) regasification terminal, located on the southern shore of the Shannon Estuary in the townlands of Ralappane and Kilcolgan Lower, Co. Kerry, comprising a new marine jetty with mooring and breasting dolphins and vehicle access, gangway tower, equipment to unload LNG from ships, monitor house, seawater intake and outlet, seawater pump house and screening equipment, jetty gate house, pipe racks and pipe tracks with LNG pipelines and seawater pipelines, plate and frame heat exchangers, 4 no. LNG storage tanks (each approximately 200,000m<sup>3</sup> in volume) with ancillary platforms, pumping equipment and vents, LNG vaporisation process equipment including compressor house, boil-off gas condensers, high pressure send-out pumps, shell and tube heat exchangers, monoethylene glycol (MEG) storage tank, MEG circulation pumps, MEG transfer pumps, MEG expansion tank, local instrument equipment room, heater building, main control room, LNG impounding basins, main electricity substation, process area electricity substation, utility area electricity substation, nitrogen generation plant comprising air purification equipment, evaporators, compressors, cold boxes, nitrogen trim heater, liquid nitrogen vaporisers, liquid nitrogen storage vessels, instrument air system comprising air receivers, air compressors, compressor aftercoolers and air driers, ancillary equipment and facilities, gas metering building, workshop and warehouse building, external storage areas, guard house, firewater pump house, materials jetty, administration building, car parking, demolition of existing derelict dwellings and farm buildings, site roads, earthworks, underground and above-ground drainage including outfall to estuary, water supply services, utility systems, embankment and pond, construction laydown areas, operational laydown area, security fence, landscaping, works to existing public road to accommodate two new entrances to the development, and all associated onsite infrastructure required to serve the proposed development.

An Environmental Impact Statement has been prepared in relation to the application.

The proposed development relates to the provision of an establishment to which the Major Accident Directive applies.

## **5.4 Infrastructure**

### **5.4.1 Report on Roads and Transportation**

During the operational phase of the development traffic movements will be relatively small, arising from approx. 50 employees, support staff and service deliveries. During the construction phase, however, it is anticipated that there will be a very high level of traffic movement associated with construction staff and materials delivery.

The existing access to the site from the R551 Tarbert to Ballylongford Regional Road is via a local road (L-1010), which is deficient in width and alignment to cater for the proposed traffic to facilitate the construction of this facility. The Kerry County Council Roads and Transportation Department considered a number of options to link the proposed development into the Regional/National Road Network as follows:

**Option 1:** Widen the existing Coast Road between Ballylongford and the Development.

This was discounted on the basis of the lack of capacity in Ballylongford Village itself.

**Option 2:** Create new linkage from proposed development to the R551 Tarbert to Ballylongford Road

This would require the construction of a new road for approx. 3kms. It would cause severance of land holdings and almost certainly require a lengthy CPO Process. If constructed, this linkage would only serve the proposed LNG development and would not benefit any lands to the East which may be developed in the future.

**Option 3:** Widen existing local road L-1010 (Coast Road) from the access to the proposed development to its junction with the R551 at Tarbert.

The existing Coast Road is substandard in cross section, vertical and horizontal alignment but the upgrading of this road would involve very little severance of landholdings. It would benefit any future development East of the LNG Terminal. In addition it would benefit the general public using the road as well as the residents along the road. Despite the fact that Tarbert Comprehensive School lies at the Eastern end of the Coast Road, it is considered that the existing situation can be improved with suitably designed Traffic Calming measures.

Option 3, the upgrading of the L-1010 coast, is considered to be the most suitable option for providing adequate access to the site.

### **Existing Road Network**

The Roads and Transportation Section of the E.I.S., submitted by Shannon LNG, Vol 2

Chapter 6 also includes for a detailed analysis of the capacity of the existing road network and the impact of the proposed development both at Construction Phase and Operational Phase.

It examines the impact on all surrounding roads in great detail and, having regard to the preferred option to access the proposed site from Tarbert, Kerry County Council Roads and Transportation are in general agreement that the areas of most concern are the impact on the traffic through Tarbert Village (Bridewell Street) and the capacity of the L-1010 coast road. At present the morning and evening peaks indicate 311 and 316 vehicles per hours respectively.

(A) Effects during peak construction period: (Ref: Table 6.9 and 6.11)

#### ***Coast Road***

The peak traffic flow for the Coast Road indicates an increase to 455 vehicles/hr, up from 35 vehicles/hr. At present the existing road is just adequate for 2 cars passing. Upgrading of this road to a standard capable of accommodating two passing HGV's will be required.

#### ***Bridewell Street***

The area of greatest concern is the section of road between the N67 Ferry Road and the N69 Junction with Listowel Road. With a projected increase of 75% during construction period, measures will have to be taken to mitigate the impact.

### **Mitigation Measures required by Kerry County Council**

- Upgrade of Coast Road.

Kerry County Council has identified the necessary measures required and the extent of the works necessary for the upgrading of this road. It is intended to proceed with the Part 8 planning process for this work in early / mid December 2007.

- Traffic Calming Measures at School.

The improvement to the Coast Road allow for these measures, to be constructed as part of the scheme. However, during school opening and closing times, a ban on HGV traffic must be introduced and enforced with vehicle monitoring cameras. The developer shall liaise with Kerry County Council and the school prior to commencement of construction in order to arrange for these cameras to be installed.

- Staggering of Shift Times

Prior to commencement of development, the developer shall submit their proposals for

the staggering of shift times to Kerry County Council for approval.

- **Bridewell Street**

An urban design has been prepared, in conjunction with the local Community Council, for Tarbert, with enhanced streetscapes within the town centre. This design provides for the upgrading of Bridewell Street to a high design standard, which will improve pedestrian facilities, provide controlled parking measures and improve traffic flows. The estimated cost of the works on Bridewell Street is €490,000.

These proposals are contingent on the development of an off-street car park at the rear of Bridewell Street, which is an objective of the Tarbert Local Area Plan (Objective Z – 8). The estimated cost of providing this car park is €105,000.

Having regard to the impact that the increased traffic volumes, and in particular the increase in HGV's through the village, will have on the community in Tarbert, the developer should be conditioned to fund this portion of the improvement works for the town – total €595,000.

- **R551 – Coast Road Junction**

Improvement works will be required to the junction of the local road L-1010(Coast Road) and the Regional Road R551 in Tarbert to facilitate the right turning movements off the R551. A mini roundabout is recommended for this junction which will have to be designed by the developer subject to approval of Kerry County Council prior to commencement of development.

- **Construction Traffic Management Plan**

A full traffic management plan will be submitted to Kerry County Council for its approval prior to the construction of the development.

#### **5.4.2 Public Water Supplies**

Construction demand for water is very high and cannot be met from the public or local group schemes. It is intended therefore to impound the on-site stream to create a pond from which water can be extracted during construction. Notwithstanding this it is considered necessary to increase the capacity of the current water supply serving the site by increasing the watermain size from 50mm to 160mm. Should permission be granted Kerry County Council intend to carry out this work.

#### **5.4.3 Surface Water**

All surface water arising on site will be discharged, via a class 1 hydrocarbon interceptor, to the surface water stream or discharged directly into the estuary via a pipeline extending



across the foreshore to below the low water mark. It is the preference of Kerry County Council that all surface waters should be discharged to the estuary.

#### **5.4.4 Wastewater**

During the operational phase wastewater arising on site will be relatively small and will be treated on site by the construction of an activated sludge wastewater treatment plant discharging its treated effluent to the estuary via the proposed surface water discharge pipe. A stand alone biocycle plant will be installed at the jetty gatehouse discharging to groundwater. The planning department considers that these proposals are reasonable and subject to meeting the standards imposed as a condition of the discharge licence are acceptable.

#### **5.4.5 Electric Power**

The terminal facility will receive electrical power from EirGrid which will involve the construction of a 110kv substation located at the site. This will be subject of a separate planning application by EirGrid.

#### **5.4.6 Infrastructure Assessment Summary**

While the proposed development will require extensive upgrading of existing infrastructure, particularly with regard to transport, the works required have been identified and can be provided. The road upgrading will require a Part 8 approval. It is intended to commence this process in early December. The provisions of the County Development Plan as outlined in Objective INF 2-3 supports the proposal.

- INF 2-3 Facilitate the provision of the infrastructure necessary to cater for the needs of industry.

Kerry County Council is satisfied that the current infrastructural deficit in the area can be addressed and will not constitute a barrier to the proposed development proceeding.

#### **5.5 Air Quality and Climate Assessment**

Chapter 8 of the EIS contains the results of extensive air quality testing and emission modelling. These studies indicate that the utilisation of 'Best Available Technology' with regard to air quality will ensure that all emissions to air will be within recognised national and international standards. In relation to climate, the analysis indicates that there will be no residual impact on climate as a result of the development. Kerry County Council is satisfied that the proposed development will not have adverse impacts on air quality or climate.