

Submission Details

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Submitter

Name	Tom Ryan
Address	Ballynoe Mungret Co. Limerick
Note	

In relation to application

Application Number	PT8LL161
Applicant Name	Limerick City and County Council
Development Address	Ballycummin Road Raheen

My name is Tom Ryan, Ballynoe, Mungret, Co Limerick. I am a farmer and the Loughmore canal and Barnakyle stream enters the Barnakyle river through my lands. This water course is the outfall for storm water from the northern portion of the Raheen Industrial estate. The Barnakyle river is also the outfall for storm water discharges from the southern end of the Raheen Industrial Estate which also flows through my lands.

1. There is a long running investigation into discharges to stormwater from the Raheen Industrial Estate. A report by an International Environmental Consultancy has found that hazardous substances are being discharged to stormwater. These hazardous substances are discharged directly to groundwater due to the unique geology of the outfall. The outfall is in the vicinity of this development.
2. Limerick City and County Council intend to discharge stormwater directly to ground in this development. The documents do not include any information on the geology of the site. Karst limestone is common in the area. How can the local authority decide to discharge to ground without information on the geology of the site? This approach would not be tolerated by a private developer.
3. Under the Water Framework Directive groundwater must be assessed. Groundwater is important both as a drinking water source and as a pathway to surface water, and for ecosystems. Limerick City and County Council have a very poor record in the protection of groundwater coupled with their lack of understanding of the directives. The groundwater must be assessed for compliance with the Water Framework Directive on this development.
4. Industries in the Raheen Industrial Estate engage in water abstraction. Contamination has been detected in water abstraction adjacent to this site. The effects of water abstraction on the environment must be included in the ground water assessment for this development.
5. The Raheen Industrial Estate has an aged infrastructure where there are misconnections between foul and storm, damaged pipes, and chambers. The integrity of the storm and foul networks has been compromised as shown in CCTV surveys. This information in the possession of Limerick City and County Council and must be included in the ground water assessment.

In a panic to get their housing numbers up Limerick City and County Council will try to push developments through without the proper assessments, despite having hundreds of vacant properties of their own. This development must be properly assessed.

Yours faithfully
Tom Ryan