

Submission No: 158



COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

Clare County Council,
Planning Department - Development Plan Review,
New Road,
Ennis, Co Clare.
V95 DXP2



November 16th 2020

**RE: Clare County Development Plan Review – Stage 1 Public Consultation
Submission in respect of the proposed N19 Shannon Airport Access Road Improvement Scheme**

Dear Sir / Madam

Clare County Council in partnership with Transport Infrastructure Ireland are progressing the planning and design stages for the N19 Shannon Airport Access Road Improvement Scheme. Clare County Council appointed Fehily Timoney & Company and Clandillon Civil Consulting Joint Venture in October 2019 as the Technical Consultants to progress the Scheme through Phases 1 to 4 of the TII Project Management Guidelines. The Scheme, once complete, will provide high-quality road improvements on the N19 National Primary Road between Drumgeely Roundabout and Knockbeagh Point Roundabout on approach to Shannon International Airport. The Scheme is currently at Phase 2 – Option Selection.

Furthermore, the proposed Scheme will be fundamental in assisting the realisation of the strategic national and regional policy objective which recognizes the importance of Shannon International Airport and the Shannon Free Zone and its potential for growth. Therefore, we welcome the opportunity to make a submission to the Pre-Draft Public Consultation Stage of the Clare County Development Plan 2022-2028 in relation to the N19 Shannon Airport Access Road Improvement Scheme. Herewith, please find attached submission (*Reference P2057/LT0010/JH/MG*), made by Clare County Council on behalf of our Technical Consultants for the Scheme.

We trust that appropriate consideration will be given to the contents of this submission and we look forward to the continued advancement of the scheme. If you require any further information or clarification regarding this submission, please do not hesitate to contact me on 065 6821616 or by email at slenihan@clarecoco.ie.

Yours sincerely

Seán Lenihan, BE CEng FIEI
Senior Engineer
Physical Development

Oifig Bainistíochta Tionscadail
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**FEHILY
TIMONEY**
— 30 YEARS —

CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE
& PLANNING

Development Plan Review,
Planning Department,
Clare County Council,
New Road, Ennis,
Co Clare.
V95 DXP2



Our Ref: P2057/LT0010/JH/MG

13 November 2020

Re: Submission to Stage 1 of the Clare County Council Development Plan

Dear Sir / Madam,

We make this submission to Stage 1 of the Clare County Council Development Plan in relation to the N19 Shannon Airport Access Road Improvement Scheme (N19).

Fehily Timoney and Company and Clandillon Civil Consulting have been appointed to provide technical consultancy services for the delivery of Phase 1-4 of the TII Project Management Guidelines for the N19 scheme.

The existing Development Plan is supportive of the upgrade of the N19 particularly in Policy Objective CDP 6.4 where it is stated that it is an objective of Clare County Council *“To facilitate the improvement/upgrade (as necessary) of the key infrastructural resources within the airport, the airport lands and the N19 providing access to the area”*.

The Issues Paper (Page 20) under ‘Transport and Infrastructure’, notes the importance of Shannon International Airport and Clare County Council’s objective to *“proactively support and encourage the sustainable development of Shannon International Airport to ensure that it continues to grow as a key driver of economic growth in the Mid-West Region”*. In order to protect and enhance this growth, it is important that the new Development Plan has full regard to the Limerick - Shannon Metropolitan Area Transport Strategy (LSMATS) (currently in draft), the Regional Spatial Economic Strategy (RSES) and, the National Planning Framework (NPF). The Draft Plan needs to provide a sufficient level of detail to define the N19 project. Both the National Planning Framework and the RSES recognizes that *“Shannon Airport has an established role as a key travel and enterprise hub for the region, with potential for further growth”*, the upgrade of the N19 is critical in harnessing this growth.

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Objective RS4 of the Draft LSMATS which has regard to National Roads, states that it is the intention of the National Transport Authority (NTA) and the local authorities to:

- Retain and protect the strategic function of the National Road network;
- Complete the appraisal process and deliver the N/M20 Cork to Limerick Road Improvement Scheme;
- Reduce peak time congestion on the N18/N19 network at Shannon; and
- Construct the N69/M21 Foynes to Limerick Road (Including Adare Bypass) to TEN-T standard

The incorporation of the above objective into the Draft Clare County Development Plan is supported however specific reference should be included to facilitate the upgrade of the N19 approach road to Shannon Airport, similar to the objectives set out in Section 2.5 of the RSES which states that *“Progress on the upgrade of the N19 to the Airport to facilitate the continued expansion and regeneration of Shannon”*.

The Draft Plan should recognise that the existing road infrastructure has capacity constraints. At present, the condition and capacity of the final two kilometers of the N19 road connecting to the airport, which is a single carriageway is a primary concern, this section of the road does not meet current National Road standards and has a number of deficiencies relating to vulnerable road users and portrays a negative image to national and international investors as they approach Shannon Airport. Thus upgrading the N19 road to Shannon Airport is critical in alleviating these issues.

Shannon and Limerick have long had a symbiotic relationship due to their proximity, with each providing shared city functions such as key international ports, education facilities and employment centres. The Shannon-Limerick node can function to its optimum potential if these functions are formally established through a spatial urban structure. Within the NPF and RSES, Limerick-Shannon is identified as a Metropolitan area. In order to achieve the vision of the Limerick-Shannon Metropolitan Area the Metropolitan Area Strategic Plans (MASP) has identified key Guiding Principles which support sustainable development, a number of which are set out below:

- A Living City and Metropolitan Area – Investment must be supported in revitalising and reinvigorating Limerick City for higher density living and high value jobs;
- Limerick Shannon as a global gateway – A competitive and well-functioning Shannon Airport and Shannon Foynes Port is essential to facilitate their growth and to ensure excellent international access;
- Compact Sustainable Growth – The development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Limerick City and 30% in Shannon and other settlements;
- Integrated transport and landuse – Target growth along high quality public transport corridors and nodes linked to the delivery of key public infrastructure; and

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- Co-ordination and active land management – Limerick 2030 provides a platform to promote additional active urban development and land management actions that focus on the development of under-utilised brownfield, vacant and public lands.

The Limerick-Shannon MASP acknowledges that integrated land-use and transportation related policies are integral to unlocking the full potential of the metropolitan area, allowing the region to compete nationally and internationally. In consideration of this, the Clare County Development Plan will be a key facilitator in supporting the growth of the Limerick-Shannon Metropolitan Area.

The Limerick-Shannon MASP recognises that whilst Shannon and Limerick are within different counties, both are 'interdependent, with complimentary functions contributing to a combined strength – a primary economic driver for the region.' Shannon is a significant employment centre with assets such as Shannon International Airport and Shannon Free Zone. Moreover, Shannon as part of the Limerick-Shannon Metropolitan Area is recognised as occupying a strategic position in the West of Ireland and having strong synergies with Limerick City. The RSES states that *"Shannon occupies a strategic position as a gateway to the West of Ireland. It is a centre of international business and has strong synergies with Limerick City. The International Airport and the industrial park, are critical not only to the Mid-West but to the country. Shannon is central to delivering the ambition for the Limerick Shannon Metropolitan Area's economic social diversity and tourism development."*

Having regard to the above and given Shannon's importance as a key economic driver for the region, strategic investment in providing enhanced connectivity between Shannon and Limerick is instrumental to unlocking the joint potential of both Limerick and Shannon, ensuring their collaborative operation as a competitive and effective metropolitan area and maintaining economic activity. It is considered that the upgrade of the N19 will be critical in assisting the realisation of the strategic national and regional policy objective which recognizes the important of Shannon Airport and the Shannon Free Zone and its potential for growth.

Yours sincerely,



Gene Flynn
for and on behalf of **Fehily Timoney and Company**

