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Southern Regional Assembly,  
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08<sup>th</sup> October 2019

**Re: Submission on the Proposed Amendments to the Draft Regional Spatial & Economic Strategy for the Southern Region**

Dear Sir / Madam,

This submission has been prepared by HRA Planning Chartered Town Planning Consultants DAC on behalf of Shannon Foynes Port Company (SFPC) and seeks to build on the two previous submissions made at pre-draft plan stage and at draft plan stage.

It is acknowledged that we can only comment on the changes proposed as amendments to the plan. Accordingly, we have set out below a number of proposed amendments which we consider require further minor changes. We have adopted the format set out in the amendments document for suggested changes such that:

- Proposed new text on foot of this submission – red font
- Existing draft text - black font
- Proposed amendments - blue font

However, in advance of consideration of individual amendments to the policy objectives it is considered necessary to highlight a correction required to terminology used to describe a proposed roads project.



## 1.0 Correction in Road Description

In advance of consideration of the amendments to the Draft Plan, we wish to draw the attention of the Assembly to the wording being used in the Draft Plan to describe a road project, namely the Foynes to Limerick Road Scheme (including Adare Bypass).

The Draft Plan references this scheme within RPO 141 as the N21/N69 Limerick to Adare to Foynes; within and RPO 159 as the N21/N69 Limerick to Adare to Foynes (including Adare Bypass) and within MASP Policy LS Objective 7 as the N69 Foynes to Limerick Road upgrade.

Any reference to this road scheme must use its correct name; Foynes to Limerick Road Scheme (including Adare Bypass). The use of alternative wording as per the Draft Plan, may inadvertently lead to suggestions that the road project could be split such that the Limerick to Adare or the Adare to Foynes sections could be delivered in isolation. It is submitted to the Assembly that this road scheme must be holistically considered and delivered and there should be no indication or suggestion, through the use of inappropriate wording, that this scheme should or can be split.

The correct title for this scheme is: Foynes to Limerick Road Scheme (including Adare Bypass) and this should be corrected throughout the Draft Plan.

## 2.0 Material Amendment 60

This amendment seeks to strengthen RPO 136 by supporting the role of Limerick Junction as a potential passenger and freight hub. There is no reference in this policy objective or in any other policy objective in the Draft Plan to the reinstatement of the Limerick – Foynes Freight Line.

SFPC's previous submission on the Draft Plan provided extensive information on the proposal to reinstate the Limerick to Foynes rail line, linking Ireland's deepest port to the national rail network. This is a key priority for SFPC as set out in Vision 2041 and significant exploratory studies have already been undertaken to assess the viability and practicality of reopening the line. The line was disconnected from the mainline at Limerick in 2004. SFPC already secured €800,000 in funding from Europe, to undertake a study of the potential for reinstating and expanding the rail line, connecting the Port of Foynes to the Irish rail network. As well as port benefits, reinstatement of the rail line has the potential to bring added tourism and environmental benefits to Foynes and the wider economy.

It is therefore requested that RPO 136 is amended to include specific reference to reinstatement of the Foynes line as a freight line in the first instance, as follows:

To support the development of a RSES Regional Freight Strategy which includes the consideration of rail freight, the asset of our region's rail network and innovations in the freight handling and transport sector to be prepared by the relevant stakeholders through consultation with the Department of Transport, Tourism and Sports, Transport Infrastructure Ireland, National Transport Authority, Local Authorities, Irish Rail, relevant delivery agencies and the port and airport authorities. Support the feasibility of Limerick Junction having the status of a national rail freight and passenger hub and the reinstatement of the Limerick – Foynes line as a freight line. The implementation mechanisms and monitoring structures to be established following the adoption of the RSES will identify the scope and role of the Regional Freight Strategy and the timescale for its preparation. The requirements of the SEA and Habitats Directives

### 3.0 Material Amendment 61

This amendment seeks to strengthen **RPO 137** by supporting the sustainable growth and investment in the region's port and harbour assets. The amendment seeks to support the sustainable development of two deep-water ports at Moneypoint and Cahiracon in line with the recommendations of the SIFP for the Shannon Estuary.

Whilst promoting the sustainable development of deep-water ports is to be welcomed, it is submitted that Moneypoint and Cahiracon should not be prioritised over other deep-water sites identified in the SIFP. As detailed in our submission at pre plan stage, SIFP has identified an additional 1,200 hectares for port development (9 no. strategic development locations). These nine strategic development locations, are a unique national maritime asset as the land comprising the SDL's adjoin identified sheltered deep-water (>15m depths) sites on the Shannon Estuary. It is thus submitted, that all nine sites should be promoted under RPO 137 and not just Moneypoint and Chairacon, as follows:

To strengthen investment to deliver actions under National Ports Policy and investment in sustainable infrastructure projects that:

- a. Strengthen and develop the strategic international, national and regional economic roles of our Tier 1 Ports (Port of Cork and Shannon-Foynes Port) and Tier 2 Ports (Port of Waterford and Rosslare Europort);
- b. Support the achievement of [Ports of National Significance](#) (Tier 1) status for the Ports of Waterford and Rosslare Europort
- c. Strengthen and develop the strategic regional economic role of other regional fishery harbours, ports and harbours;
- d. [Support the export, fisheries, marine tourism and marine economy potential of port and harbour assets in the Southern Region as listed in Table 6.2 and support investment in the transition to smart technologies of port and harbour assets.](#)
- e. [Support the sustainable development of the 9 no. strategic development locations adjoining sheltered deep-water strategically located deep-water ports at Moneypoint and Cahiracon in line with the recommendations of the SIFP for the Shannon Estuary](#)
- f. Development proposals will be subject to environmental assessment, [implementation of mitigation measures outlined in applicable SEAs and AAs](#) and feasibility studies to establish that any expansions can be achieved without adverse effects on any European sites and within the carrying capacity of the receiving environment of the ports

We thank the Assembly for considering our previous two submissions in the preparation of the Draft Plan to date and look forward to the adoption of the Regional Spatial & Economic Strategy for the Southern Region in due course.

Yours faithfully



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Mary Hughes MIPI

Director HRA Planning chartered town planning consultants DAC