



Comhairle Cathrach
& Contae Luimnigh

Limerick City
& County Council

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Southern Regional Assembly
Assembly House,
O'Connell Street,
Waterford

11th October 2019

RE: Submission on material amendments to the Southern Regional Spatial and Economic Strategy

Dear Sir / Madam

Limerick City and County Council made a detailed submission in response to the Draft RSES and wishes to acknowledge and commend the level of work by the Regional Assembly in assessing the issues raised. It is acknowledged that the material alterations only are currently on public display and that the Directors report dated April 2019, indicated that a number of the recommendations on the submissions will be reflected in the editing of the draft RSES. While not part of the material alterations, Limerick City and County Council wish to reiterate the importance of the narrative being changed to include greater emphasis on the importance and strength of all three cities.

In relation to the material alterations, currently on display, the following changes are suggested:

- Material amendment 6 – table 3.2 – include Local Area Plans under Policy level
- M20 Limerick to Cork scheme should be included in the Cork MASP
- Material amendment 4 – new RPO in relation to collaboration between Metropolitan areas *“It is an objective to establish a collaborative approach between Metropolitan Areas of Cork, Limerick/Shannon, and Waterford (together with Galway): that they lead in partnership with each other to harness their combined potential as viable alternatives to Dublin. The Southern Region’s Metropolitan Areas should be prioritised for focused and long-term investment as the region’s most significant economic engines to ensure regional parity (together with Galway) and to act as an effective counter-balance to the unbalanced growth of Dublin. Central to the success of this collaborative approach is the early delivery of the M24.”*

It is requested that rather than reference to the M24 that the objective is reworded to state "better infrastructure connectivity between the cities". As the route has yet to be selected for the Cork to Limerick Road scheme, there is concern that the absence of any reference to the N/M20 here could be construed as apportioning additional weight to the M24.

- Additional text proposed to RPO 32 (Support Compact Growth) in relation to brown and greenfield sites should also be reflected in RPO 8 Compact Growth in Metropolitan Areas.
- There are numerous mentions of an M24 throughout the document. On pages 7, 21, 45 & 65. It is important that the N24 improvements are included, but whether the improvements will be to Motorway standard or not is unknown. There are 2 schemes on the N24 that have made it into the NDP. The Mid West Road Design Office are currently appointing technical advisors to one of them and another RDO is doing a similar process, but slightly behind us. The cross section of the road is not known and given traffic flows, may not be a Motorway. It is always better to refer to such projects in the context of "Infrastructural improvements to the N24" or "N/M 24 improvement schemes". This should be changed.
- Material Amendment 66 has a new line about DMURS. It refers to the (Version 2013). Note that there is a new version launched in May 2019. It's best not to refer to a particular year, as it is likely that the 2019 version will be updated during the life of the RSES.
- Material Amendment 74 – Page 46. There are two lists of road schemes. The second list of schemes refers to schemes that were at Pre Appraisal, but it is our understanding that all now have gone through that process and are now as "live" as the first list. Therefore, the paragraph between the two lists should be removed.
- Material Amendment 74 – Page 47. There is a line "Upgrade and improve the N24 Limerick to Waterford Corridor", that should be replicated for other corridors including the N69, N21, N20, N18, which will cover other minor improvements on National roads that are not covered by a large project.
- Material Amendment 74 – Page 47. Add the following schemes –(1) N20 O'Rourke's Cross, (2) N24 Beary's Cross (3) N19 Shannon Airport Access Road Improvements.
- Material Amendment 125 – Page 82 – Put in the correct name for the "Foynes to Limerick Road (Including Adare Bypass) Project" on the third bullet point and in other areas in the document.
- Material amendment 73 (RPO 158) refers to upgrade of the N24, but no mention of upgrade of N20. There is a need for consistency in relation to mention of these schemes.

- Material amendments 74 and 110 refers to the Cork North Ring Road. It should be noted that the Cork North Ring Road, in accordance with the NDP, is a complementary but separate standalone scheme to the N/M20 Cork to Limerick Road Improvement Scheme.
- Material amendment 106: Consistency in naming ie: N24/M24 or M24 and M20 etc. Why mention upgrade of N24 but not mention upgrade of N20? N20/M20 could be read as the existing route which includes the N20 and M20.
- Material amendment 122: Add additional text to support the collaboration and or partnership between Limerick City and County Council and the Land Development Agency to masterplan and develop strategic city centre and Dockland sites in Limerick City, utilising the appropriate planning mechanisms.

At a briefing meeting with the Elected Members of Limerick City and County Council on the 1st October the members present requested that the issue raised in their previous submission relating to a ban on incineration to be reconsidered.

To conclude Limerick City and County Council look forward to continued engagement and working with the Regional Assembly during the implementation stage of the RSES.

Yours Sincerely



Vincent Murray,
A/ Director Economic Directorate
Limerick City and County Council

