

NPF Submissions,
Forward Planning Section,
Department of Housing, Planning, Community and Local Government,
Custom House,
Dublin D01 W6X0

Email: npf@housing.gov.ie

09th November 2016

Re: Submission on the Draft National Planning Framework on behalf of Shannon Foynes Port Company

Dear Sir / Madam,

I confirm that we have been retained by Shannon Foynes Port Company (SFPC), to prepare a submission on their behalf, in relation to the Draft National Planning Framework (NPF). We welcome the publication of the Draft NPF and in particular, the emphasis placed on the marine potential of the country, Chapter 6.0 'Realising our Island and Marine Potential'.

A comprehensive submission was made on behalf of SFPC at pre-draft plan stage. Whilst it is not proposed to re-iterate the detail of this submission, it is proposed to concentrate on some pertinent points which were not included in the Draft NPF, but which are considered to be particularly important for the future expansion and growth of SFPC.

1.0 PRE-DRAFT NPF SUBMISSION

Our previous submission requested that the NPF recognise SFPC as a national economic driver and a unique, natural asset in the Mid West Limerick City region which cannot be replicated elsewhere. The strengths of SFPC and the Mid West Limerick City region must be recognised in the NPF in devising its spatial growth approach and central to this approach will be:

1. Recognition of SFPC as a port of international and national significance;
2. Identification of the Shannon Estuary, its ports and future development as a significant economic driver and transport corridor in the region;

3. Acknowledgement of the strength of port activity in the Mid West Limerick City region; and
4. There needs to be a focus on the delivery of the Foynes to Limerick Road Improvement Scheme and promotion of the Limerick to Foynes Railway line as a national strategic freight link.

2.0 ISSUES TO BE ADDRESSED IN THE NPF

Whilst the Draft NPF acknowledges some of the key indicators identified in the pre-draft NPF submission, it fails to:

1. Identify the Shannon Estuary, its ports and future development as a significant economic driver and transport corridor in the region; and
2. Promote the Limerick to Foynes rail line as a national strategic freight link
3. One issue, not previously raised by SFPC, but addressed in this submission is the implications for ports arising from Brexit.

This submission requests that these three specific issues are included within the NPF.

2.1 Support for Expansion & Growth

As highlighted in the pre-draft NPF submission, SFPC has significant expansion plans for its port facilities, in line with the overall vision and strategy set out in the SFPC Masterplan Vision 2041. At EU level there is extensive support for the development of Ireland's ports with the three core ports in Ireland, including SFPC, securing EU funding for significant development projects. SFPC secured funding in respect of two different but inter-related projects in recent times. It received €800,000 in funding to undertake a study of the potential for reinstating and expanding the rail line connecting the Port of Foynes to the Irish rail network. It also received €2.2 million in funding for jetty enhancement works, aimed at transforming the Shannon Estuary into a major national and international economic hub. Such funding continues to enhance port infrastructure in Ireland.

Successful funding applications at European level are dependent on demonstration of support at national level for particular proposals. The future growth of SFPC must be promoted and supported in the NPF in order to facilitate future funding applications. It is not adequate that National Policy Objective 42 of the Draft NPF defers consideration of the role of Tier 1 ports to the Regional Spatial and Economic Strategy (RSES). Whilst it is acknowledged that strategic plans for the Tier 1 ports and city growth strategies should align and be consistent with the broader aims and policies for the city regions, it is submitted that the growth and expansion of Tier 1 ports must be facilitated and stated in the NPF, at national level and in particular having regard to the National Port Guidelines.

It is noted that one of the key growth enablers for Limerick City includes the continued expansion of third level institutions. It is submitted that one of the key growth enablers for Limerick City should be facilitating the growth of SFPC in much the same way as in Dublin City one of the identified key growth enablers is facilitating the growth of Dublin port.

It is requested that SFPC is identified as a 'key growth enabler' and that future growth in Limerick must

“Recognise SFPC as a national economic driver promoting and creating economic growth, and facilitating the growth of SFPC through greater efficiency and improved road access”.

2.2 Support for Rail Link

Whilst the Draft NPF supports the Foynes to Limerick Road Improvement Scheme and identifies it as a 'key future growth enabler' for Limerick, it fails to support the reinstatement of the Limerick to Foynes Railway line, linking Ireland's deepest port to the national rail network. SFPC has already secured €800,000 in funding 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 the economy.

Both the road and rail links are key twin element for the TEN-T requirement for Tier 1 ports and are intrinsically linked to delivering the balanced economic growth objectives as set out in the Draft NPF. With adequate support in the NPF, a potential rail connection has the real possibility of forming a central part of the 'access strategy' for the port, consistent with European and national transport policy.

Accordingly, it is requested that the reinstatement of the Limerick to Foynes Railway line is identified as a key future growth enabler for Limerick as follows:

“Enhanced road and rail connectivity to ShannonFoynes Port, including local road by-passes”.

2.3 Implications of Brexit

Whilst Chapter 7 of the NPF deals with connectivity with other countries and does mention faster transit times between Ireland and the EU, it is noted that there is no National Policy Objective supporting this statement.

Chapter 7 of the NPF document “Working With Our Neighbours” is intended to deal with connectivity and states: *“As a result, ports and airports facilitating faster transit time between Ireland and the EU will need to be effectively connected into our land-based transport system”.* The document then goes on to state that as more becomes known about the overall shape and implications of the Brexit process, implementation of Ireland 2040 will be adjusted and that any review will take place in the context of the next review of the NPF. The Draft NPF does not state when a review will take place or whether the plan will remain in place, unchanged for the next 20 years. It is submitted that the Draft NPF should either specify that the plan will be reviewed within one year of Brexit formally happening, or that a defined review period is provided for within the document.

Chapter 7 sets out various National Policy Objectives, which all deal with linkage with Northern Ireland, Wales and our closest neighbours. However, there is no National Policy Objective dealing with connections to Europe and this should be included in the NPF, as follows:

“Work with the EU to ensure the early delivery of the necessary upgrade to the land based transport systems to our Tier 1 Ports and Airports to ensure faster transit time between Ireland and the EU and to promote balanced regional economic growth”.

The inclusion of this National Policy Objective, is all the more important, as SFPC is seeking designation to the North Sea – Mediterranean (NS-M) transport corridor. The current NS-M corridor is presented in Figure 1.0 below. The TEN-T Network has a total of nine transport corridors of strategic interest. Designation of Shannon Foynes Port as part of this transportation corridor would unlock additional advantages for future port development as well as supporting enhanced external connectivity with Ireland’s European partners. Brexit will also place Ireland in a unique position to support the further development of this corridor given the long-term withdrawal of the UK from the EU and thus the corridor.



Source: EU Commission

SFPC has recently been explicitly referenced by the European Coordinator for the TEN-T North Sea Mediterranean Corridor, as playing a key role as a core port in facilitating the interconnections with both rail and ‘Motorways of the Sea’ (which promotes intermodal maritime-based logistics in the context of the North Sea Mediterranean Corridor). However, the European Coordinator also noted in relation to road connections that:

“In Ireland, where rail currently plays a minor role in freight transport, and where there are no commercial waterways, road projects are essential for maintaining accessibility to and from the seaports.”¹

¹North Sea – Mediterranean Ten-T Core Network Corridor – Second Work Plan of the Coordinator, December 2016.

2.4 National Strategic Outcomes

The National Strategic Outcomes for consideration in developing the National Investment Plan that will support the Ireland 2040 are outlined in the Draft CDP. Whilst it is acknowledged that the outcomes are an indicative outline at this point it is nonetheless recognised that identified and supported projects must benefit and progress towards Ireland 2040 goals. One of the national strategic outcomes is the enhancement of road connectivity to Shannon-Foynes Port, including local by-passes. However, it does not provide for the growth of Shannon Foynes Port Company in the same way as it does for Dublin Port. It is therefore requested that the national strategic outcome as it relates to SFPC is amended to read as follows,

“To facilitate the growth of SFPC through greater efficiency and improved road access, including the enhancement of road connectivity, including local by-passes”.

3.0 CONCLUSION

The economic performance of SFPC is sufficiently important to affect the performance of the Irish economy and the maritime ports strategy for the country. The significance of SFPC must be recognised, encouraged, supported and overall must be actively promoted in the NPF, if its full economic potential is to be realised in the future. This can be achieved in part through promotion of SFPC’s future growth and expansion plans, improvement of the Limerick – Foynes Road and support for the reinstatement of the Limerick to Foynes Railway line