



Comhairle Contae Thiobraid Árann
Tipperary County Council

Comhairle Contae
Thiobraid Árann,
Oifigí Cathartha,
Cluain Meala,
Co. Thiobraid Árann
Tipperary County Council,
Civic Offices, Clonmel,
Co. Tipperary

Comhairle Contae
Thiobraid Árann,
Oifigí Cathartha,
An tAonach,
Co. Thiobraid Árann
Tipperary County Council,
Civic Offices, Nenagh,
Co. Tipperary

t 0761 06 5000
e customerservice
@tipperarycoco.ie

tipperarycoco.ie

Mr. Eoghan Murphy TD,
Minister for Housing, Planning and Local Government,
Department of Housing, Planning and Local Government,
Custom House,
Dublin 1.

9th November, 2017.

Re : Submission to the Draft National Planning Framework – N24 Project.

Dear Minister,

I refer to publication of the Draft National Planning Framework and attach for consideration submission in relation to the N24 project

The proposal to upgrade the N24 to motorway standard, which has been the subject of previous written submissions, is supported by Tipperary County Council, Waterford City and County Council and Kilkenny County Council. Tipperary County Council has also made a submission to the Mid Term Review of the Capital Investment Plan.

Yours sincerely,

Joe MacGrath
Chief Executive



Comhairle Contae Thiobraid Árann
Tipperary County Council

Ireland 2040 – Our Plan

Draft National Planning Framework

Submission by Tipperary County Council on the N24

10th November 2017

**The submission is made on behalf of Tipperary County Council to
Draft National Planning Framework in Support of the Upgrade of the
N24.**

1.0 Introduction

The Draft National Planning Framework has identified that the development of our Regional Cities, is critical in complementing the role of Dublin, whilst providing effective regional development and a counter pole to Dublin's growth. The cities of Limerick, Waterford and Cork in the Southern Region will be instrumental in this new vision as each are major centres in their own right. A key issue for growth will be the ability of these City Regions to connect with each other in support of the economic growth of the Southern Region, and with the major international access ports and airports.

A joint submission on behalf of Tipperary County Council, Waterford City and County Council and Kilkenny County, in support of the upgrade of the N24 to motorway standard, was made as part of the Ireland 2040 – Our Plan, Issues and Choices Public Consultation process. A submission was also made by Tipperary County Council. The Council also made a submission to the Mid Term Review of the Capital Investment Plan. This submission is made in support of these submissions.

2.0 Background/Current Network

Cork, Limerick and Waterford, are currently connected to each other by the national road network (namely the N24, N25 and N20). While previous proposals have been developed to up-grade these routes, none of the proposals are currently part of the national capital road investment programme¹. This is a significant concern as it is clear that the current roads transport network is not fit for purpose. With particular respect to N24, despite its importance to the region it suffers from slow journey times, is sub-standard in its design and alignment and is congested where it routed through a number of towns and villages including Clonmel, Carrick on Suir and Tipperary.

3.0 Recommendation

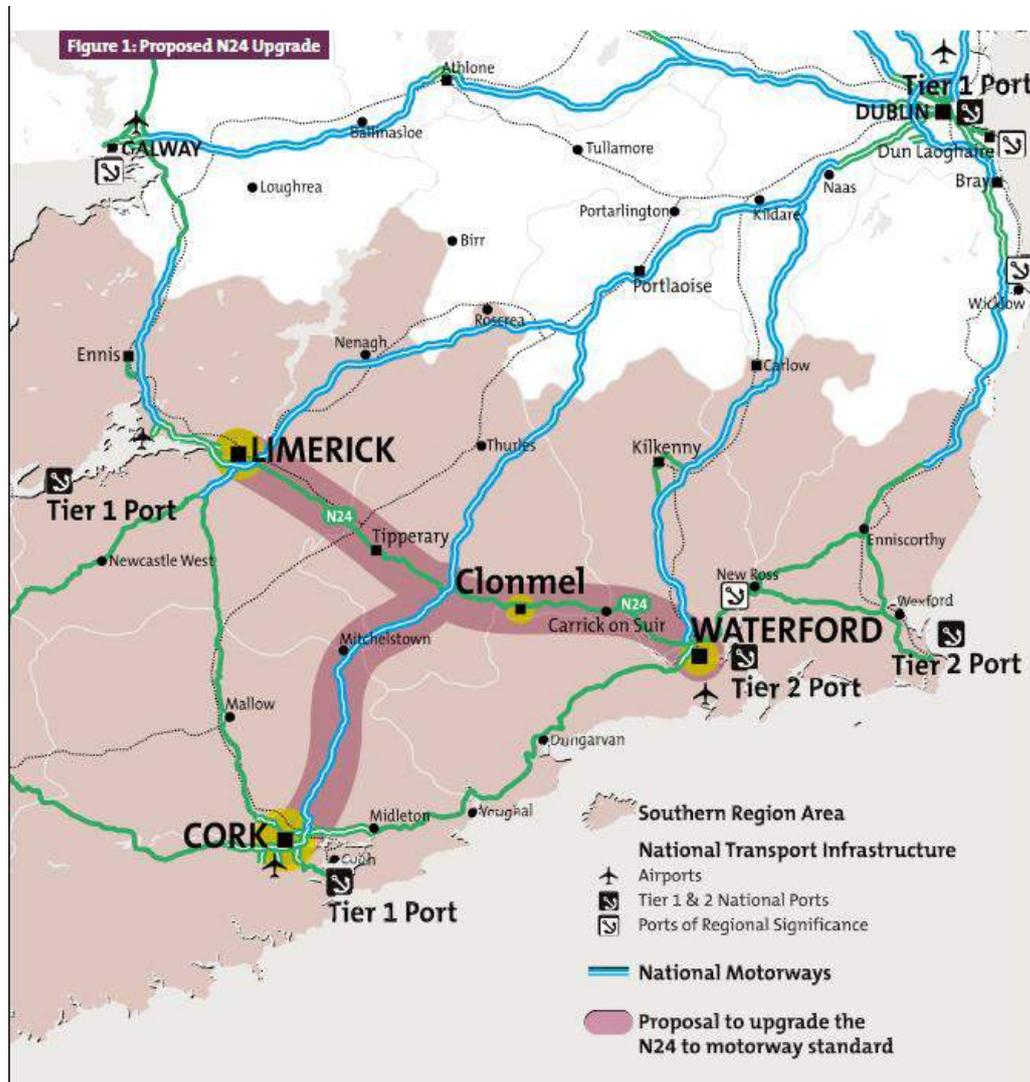
Figure 1 overleaf, illustrates the optimal solution to achieve maximum connectivity between the southern regional cities in the most cost-effective way possible. The map sets out how a new M24 running between Limerick and Waterford and connecting into the M8 at Cahir, would allow for effective linkages between the cities.

This concept has already been established on the rail corridors, where Limerick Junction provides the connection point between the Limerick/Waterford, Dublin Cork, Limerick/Cork

¹ Department of Transport, Tourism & Sport (2015) *Investing in Our Transport Future: Strategic Investment Framework for Land Transport*.

and the Waterford/Cork rail lines. This established practice demonstrates that direct routes are not necessary for a Country the size of Ireland.

Figure 1: Strategic Transport Connections in the Southern Region



Tables 1 and 2 below, together with Figure 2, illustrate the cost implications of each route together with drive time estimates:

Table 1: Options to Link the 3 Cities – cost comparison (figures in Millions)

	New Motorway: M25, M24 & M20	New Motorway: M25 & M20 only	New Motorway: M24 Only	New N24: 2 plus 2 Only	Existing
Limerick to Cork	€800M	€800M	€0M	€0M	0
Limerick to Waterford	€1020M	€0M	€1020M	€510M	0
Waterford to Cork	€930M	€930M	€0M	€0M	0
Total	€2750M	€1730M	€1020M	€510M	0

Figure 2: M24, M25 and M20 Comparison

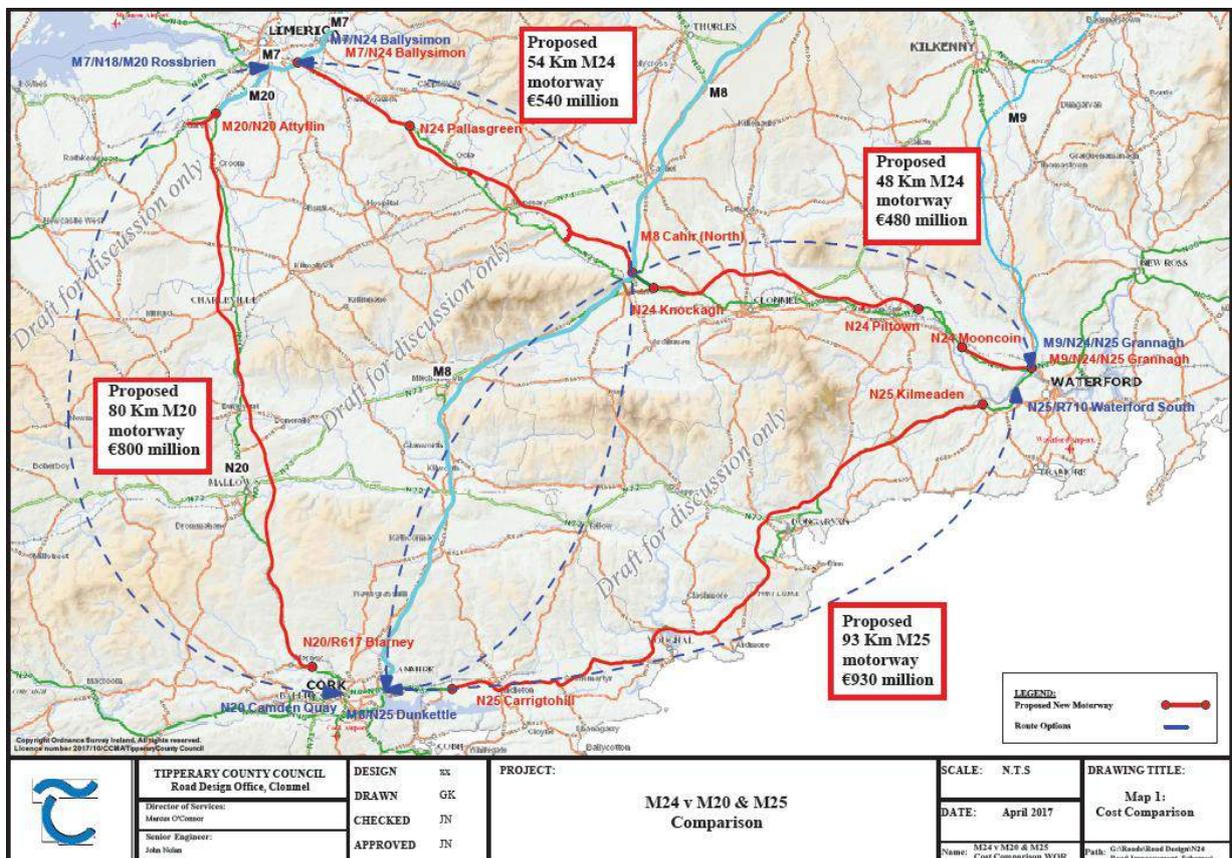


Table 2: Options to Link the 3 Cities - Travel times comparisons (mins)

	New Motorway: M25, M24 & M20	New Motorway: M25 & M20 only	New Motorway: M24 Only	New N24: 2 plus 2 Only	Existing
Limerick to Cork	via M20 64	via M20 64	via M24/M8 73	via N24/M8 79	N20 88
Limerick to Waterford	via M24 65	via existing N24 116	via M24 65	via new N24 80	N24 116
Waterford to Cork	via M25 62	via M25 62	via M24/M8 76	via new N24/M8 83	N25 89

4.0 Strategic issues

4.1 Maximise potential of the Strategic National Ports

The viability of the ports in the South East (Rosslare, Belview/Waterford). Mid-West (Foynes/Limerick) and the South West (Cork) to act as import and export centres with the EU and the UK is dependent on good land routes from the region. In the Government's 2013 National Ports Policy, ports which handle commercial freight were categorised into Ports of National Significance (Tier 1), which includes Dublin Port Company, the Port of Cork Company and Shannon Foynes Port Company and Ports of National Significance (Tier 2), which includes Port of Waterford Company and Rosslare Europort.

With the presence of 4 of the 5 Ports of National Significance in the Southern Region the provision of high quality linkages between them is strategically important. Each of the 4 ports has substantial expansion plans and there is the potential for these ports to make a major contribution to the economic development of the Country. The Ports Policy sets out that the interconnections between the national primary road network and the commercial port network "will continue to be of primary importance". This was recognised in the Spatial Planning and National Roads – Guidelines for Planning Authorities. These state that "the primary purpose of the national road network is to provide strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports" (*Department of Environment, Community and Local Government, 2012*).

The development of the M24 will provide the linkages between these ports, meeting the criteria of the European Union’s Trans European Network – Transport (TEN-T).

4.2 Maximise Investment of Existing M8:

The Cahir to Cork section of the M8 Motorway is underutilised at present. It has a design capacity of approximately 50,000 (AADT) daily traffic movements and is operating at between 25% and 48% of that (see table 3 below). This section of Motorway represents an infrastructural asset with a capital value estimated at €720M (not including the planned major upgrade at Dunkettle roundabout proceeding under the current National Capital Investment Plan), which represents €540M (75%) to €374.4M (52%) of a capital asset which is not being utilised, based on current AADT figures. One way of realising the return on existing public investment is to use the M8 to link both the Cities of Limerick and Waterford to Cork.

The previous ‘travel times exercise’ set out in Table 2, shows that the M8 is a viable option for inter City commuters and a significant percentage would use the route. Even making assumptions that major traffic volumes from N20 and N25 switch it is clear from the table below that the M8 would cater for that well within its design capacity.

Table 3: Summary of Traffic Counts and Projected Traffic Counts

	Summary of Traffic Counts (AADT)			Projected Traffic Counts (AADT)
	N20 (Limerick to Cork)	N25 (Waterford to Cork)	M8 (Cahir to Cork)	M8 (Cahir to Cork) assuming % of Limerick and Waterford Traffic
Mid Route, approx 50km from Cork*	10000	10000	12500	22500
Approx 20km from Cork**	16000	16000	24000	34000
At entrance to Cork***	21000	53000	22500	(1) 28500 to (2) 39300

Assumptions:

- *existing M8 + 50% Limerick + 50% Waterford
- **existing M8 + 50% Limerick + 50% Waterford
- ***(1) existing M8 + 50% Limerick + 10% Waterford (2) 100% future M8 traffic at 20Km + 10% at entrance

Note 1: AADT = Average Annual Daily Traffic

Note 2: These are preliminary figures. Detailed traffic modelling would be required.

5.0 Key Justifications

- A motorway on this route would reduce the urgency for direct motorways between Limerick and Cork, and Waterford to Cork, saving significant amounts of public monies, maximising existing public infrastructure and creating key connectivity across the Southern Region and between its City Regions. The success of the proposed city regions in the South will rest heavily on their ability to connect with each other, with the key centre of Dublin and with the supporting network of towns.
- Developing the M24 in phases is an opportunity to provide a section of motorway that benefits all 3 Cities. As a first phase, Limerick can be linked to Cork via the M8 at a cost of €540 million, which also completes more than 50% of the Limerick to Waterford Road. This would have the following benefits:
 - Cut journey times between Ireland's second and third cities.
 - Result in significantly savings to the exchequer.
 - Provide for a safer road network for all road users.
- The viability and future growth of the towns and villages along the route of the N24 is also dependent on the removal of the heavily traffic volumes currently experienced due to the location of the route in town centres.
- Following an analysis of the figures, the upgrade of the N24 to motorway standard, and linking into the M8 at Cahir, would:
 - Provide connectivity between the three cities of the Southern Region,
 - Reduce the need for three motorways down to one,
 - Maximise public capital investment in the M8, and
 - Would provide a saving of between €710 million and €1,730 million to the exchequer.

6.0 Conclusion:

It is recommended that an objective to upgrade the N24 to motorway standard is included as a National Strategic Outcome in the National Planning Framework as it supports national parameters for maximising land transport networks and will provide critical connectivity between the Cities in the Southern Region while achieving value for money for the exchequer.



Comhairle Contae Thiobraid Árann
Tipperary County Council

Tipperary County Council

Civic Offices

Limerick Road

Nenagh

Co. Tipperary

Tipperary County Council

Civic Offices

Emmett Street

Clonmel

Co. Tipperary