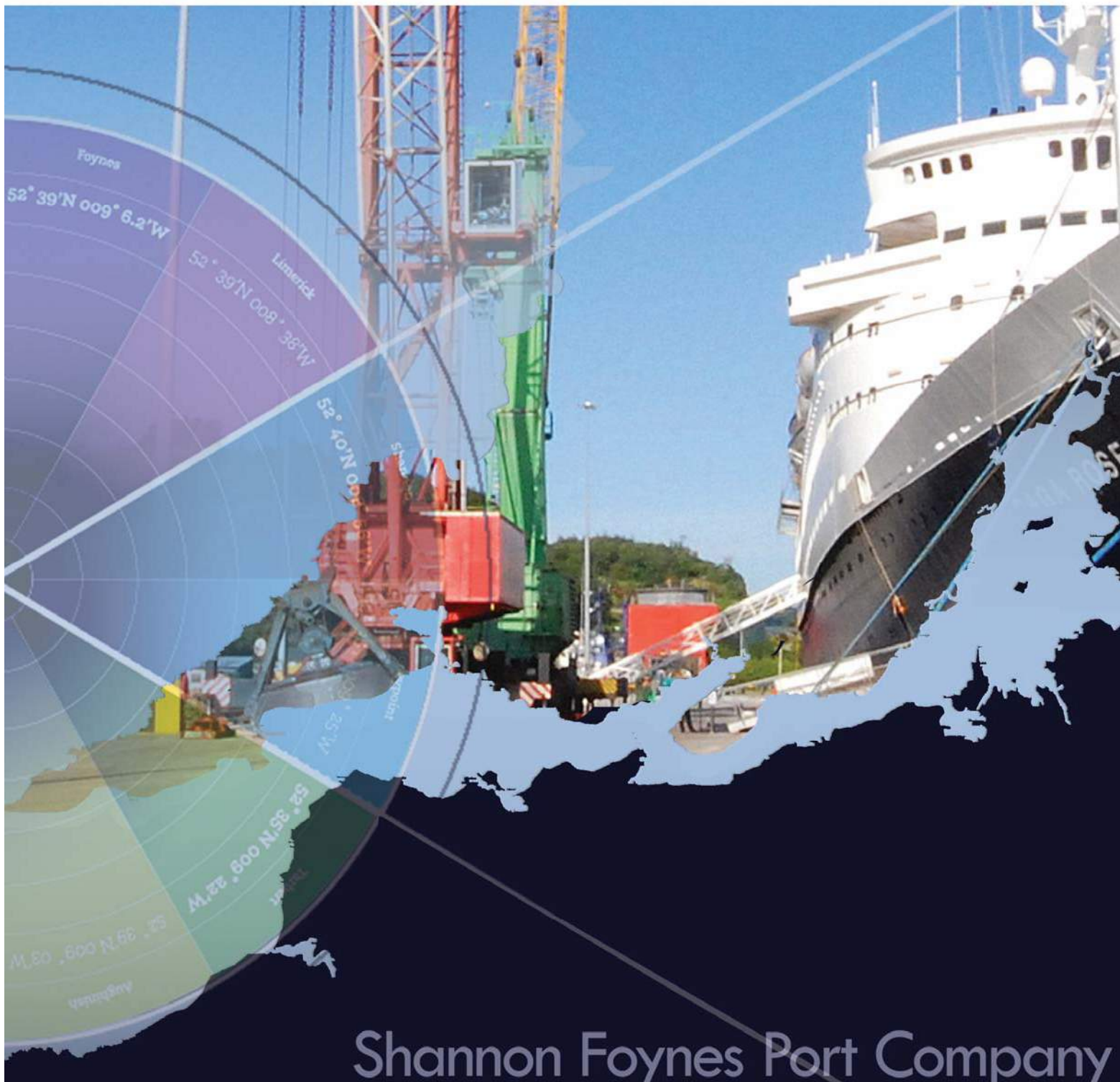




Shannon Foynes
PORT COMPANY



Shannon Foynes Port Company

Submission on the Proposed National Planning Framework 2017

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1.0 INTRODUCTION

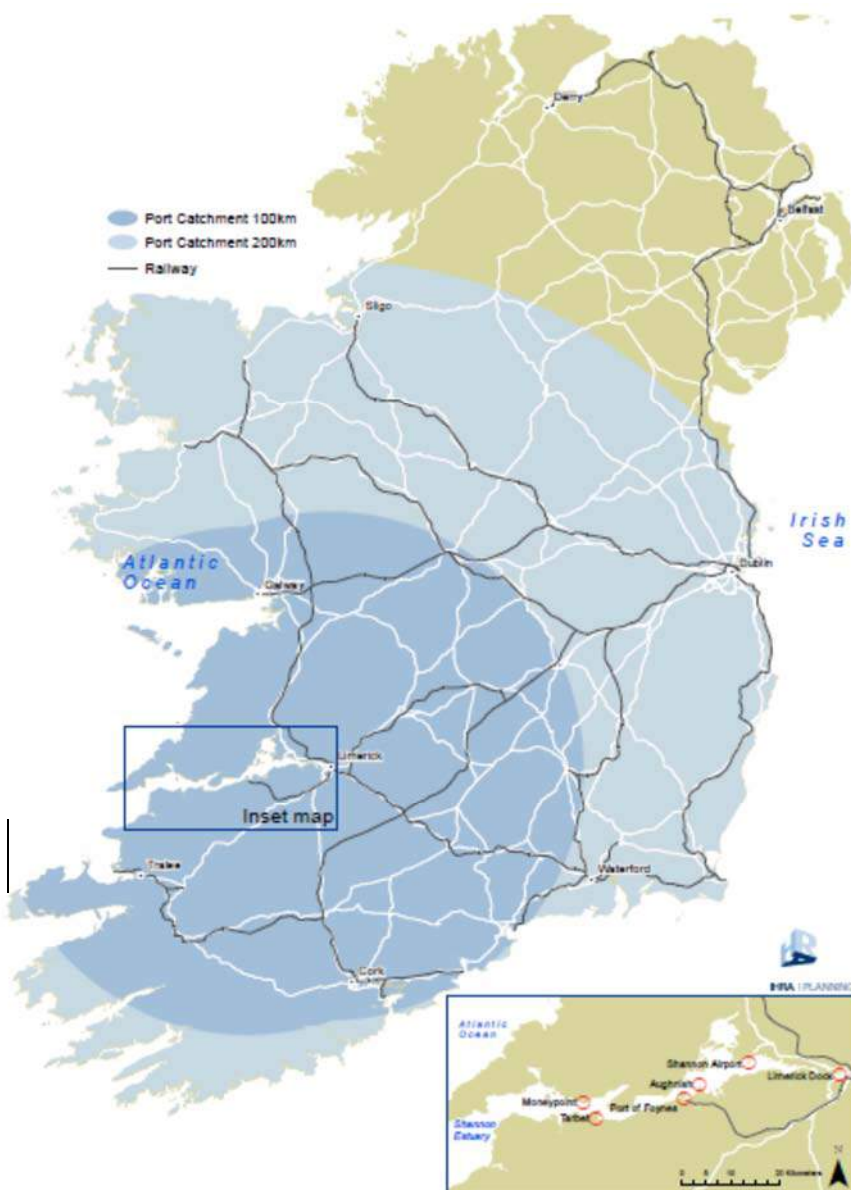
The wider consideration of maritime and terrestrial planning issues within the Issues and Choices Paper in February 2017 is to be welcomed and is particularly supported by Shannon Foynes Port Company (SFPC). This submission seeks to concentrate on ports, harbours and shipping and in particular the need to consider the influential and positive impact that a Tier 1 commercial port can have on the wider city-region economy. The inter-relationship between land and sea ‘planning’ needs to be enhanced, particularly having regard to infrastructure investments and transport connectivity. The National Planning Framework (NPF) needs to better understand this inter-relationship and use this understanding to guide spatial planning throughout the country.

A tiered system of ports has been introduced in Ireland to facilitate more competitive and effective market for maritime transport services. Long term international trends in the sector are towards consolidation in shipping and port infrastructure to maximise efficiencies. Therefore, the Department of

Transport considers it is best that national ports policy is focused on the development of Ireland’s largest commercial ports including SFPC. The tiered approach implemented by the Department through the National Ports Policy 2013 is consistent with the European Union’s Trans European network – Transport (TEN-T) Policy and must be supported by the NPF.

The economic performance of SFPC is sufficiently important to affect the performance of the Irish economy and the maritime ports strategy for the country. Any lessening or reduction in the status of SFPC as a national Tier 1 port through regional prioritisation would undermine national and international ports policy.

Port infrastructure will be funded by SFPC and the private sector as envisaged in the 2013 National Ports Policy. It is important that the NPF provides the policy basis to ensure that this investment can be realised through recognition and promotion of National Ports Policy 2013.



2.0 PURPOSE OF SUBMISSION

It is recognised that the NPF is a strategic document aimed at guiding development throughout the country. It is further recognised that the ports sector is just one of the many economic stimulus and growth points in the country and that the NPF must take a strategic view of all generators. However, there is some concern that the potential of ports and their contribution to economic development at national and regional level is not fully recognised in spatial planning documents. The significance of the ports must be recognised, encouraged, supported and overall must be actively promoted in the NPF, if their full economic potential is to be realised in the future. This can be achieved in part through recognition of SFPC's standing as a Tier 1 Port as prioritised in the 2013 National Ports Policy.

The potential of the marine economy cannot be considered in isolation but rather must be considered in a wider socio-economic context, building on the potential of the region and the potential of existing and future commercial synergies. The NPF must not solely focus on population growth patterns and the urban – rural divide in strategically planning the future of our country. Instead it must take account of a regions assets and the potential of that asset to strengthen and grow with appropriate investment. SFPC, the largest bulk port in the country is substantially located in a rural area, but yet is one of the regions foremost economic drivers. SFPC's investment plans will potentially attract thousands of jobs to the rural economies adjoining the Shannon Estuary, a strategy which is completely in accordance with the objectives of the Governments Marine Strategy, 'Harnessing Our Oceans Wealth'.

It is requested that the NPF recognises SFPC as a national economic driver and as 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. *Consistent with the 2013 National Ports Policy, promotion of a framework for the provision of port infrastructure and services which are efficient, effective and adequate for the needs of the trading economy in the Mid West Limerick City region. 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.*

This submission will provide the supporting information necessary to substantiate the position of SFPC at an international, national and regional level. It will provide the substantive evidence necessary to justify recognition of SFPC in the NPF as a Tier 1 port and will support the potential of the port to grow and contribute significantly to the national and regional economy.

3.0 COMPANY OVERVIEW

Shannon Foynes Port Company (SFPC) with the Shannon Estuary as its harbour, extends from Limerick city to the Atlantic Ocean and is Ireland's premium deepwater resource with a channel depth of in excess of 18 metres and connected to all major international shipping lanes. SFPC oversees trade with an annual value of €8.4bn. The existing facilities on the estuary are serviced by the largest vessels entering Irish waters routinely handling large vessels up to 200,000 deadweight tonnes (dwt). Shannon Estuary has a number of substantial deepwater facilities under the

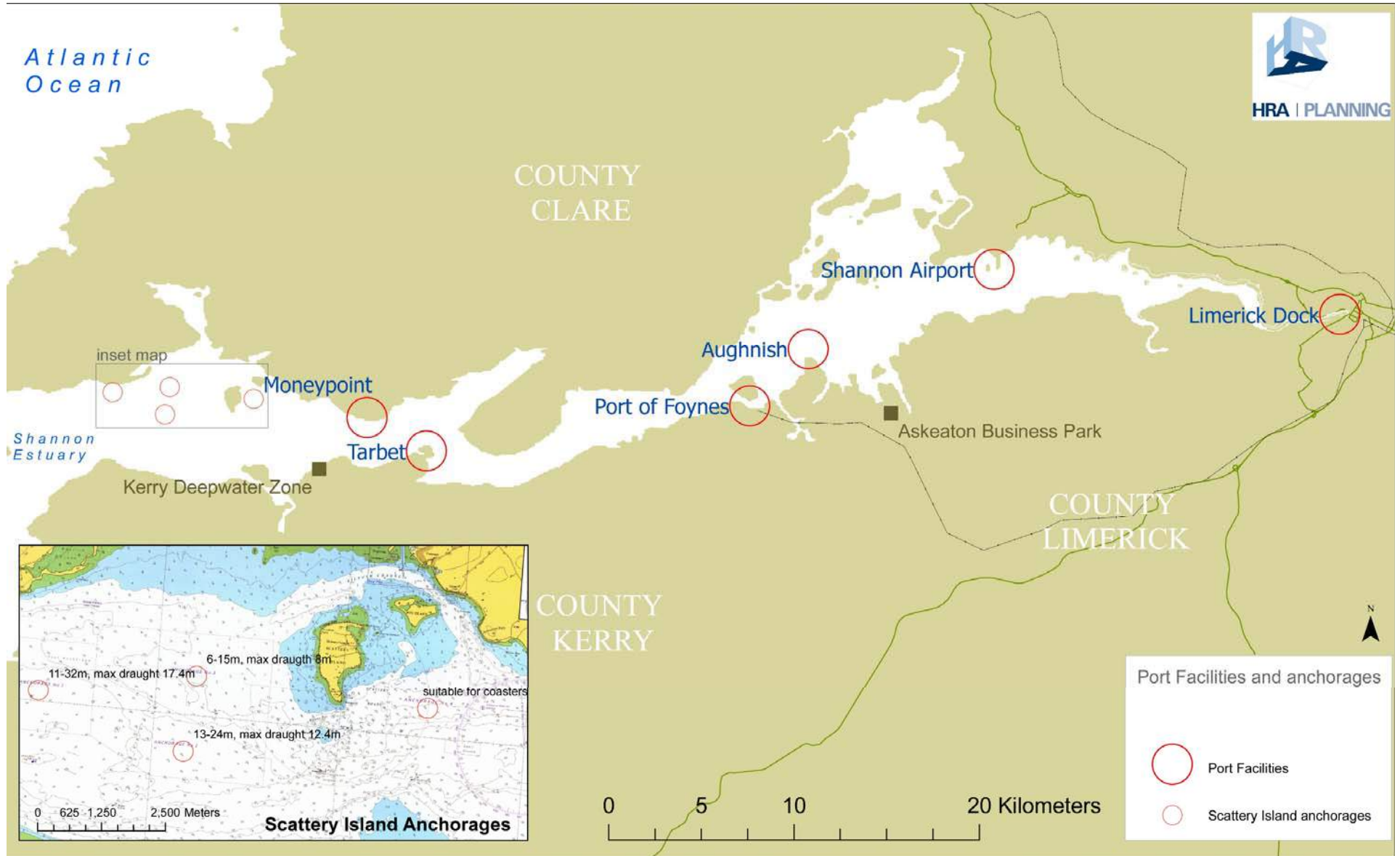


Figure 1.0 SFPC Facilities on the Shannon Estuary

authority of SFPC each with significant adjoining land banks with access to the high voltage electricity network and gas supply. These facilities include the general cargo ports at Foynes and Limerick Docklands as well as the single user jetties at Moneypoint, Tarbert Island, Aughinsh and Shannon Airport Aviation Fuels Jetty.

SFPC is recognised by the European Commission as one of the three core ports in Ireland under the Trans- European Transport Network (Ten-T). In the Government's 2013 National Ports Policy, it is recognised as one of the three Tier 1 ports of national significance. Importantly, this Government Policy identifies the Tier 1 ports as responsible for providing future national port infrastructural capacity.

SFPC is Ireland's largest bulk port and its second largest port operation currently handling in excess of 11 million tonnes per annum. SFPC's masterplan, Vision 2041, is a highly collaborative masterplan outlining, inter alia, SFPC's sustainable capacity requirements out to 2041. The Port company is actively preparing a Strategic Infrastructure Planning application for next phase port development in line with Vision 2041.

FACTS & FIGURES

- The annual economic impact of SFPC related activity has reached €1.9bn – equivalent to 1% of Ireland's entire GDP.
- SFPC's status as an EU TEN-T Core Network Port reflects the Port's strategic importance and role in supporting the functioning of the EU Internal Market and the development of an integrated, multimodal and sustainable European transport network.
- TEN-T regulations includes an explicit requirement that the road network serving a core network port must comprise either motorway or 'express' standard roads. Such connectivity must be in place by 2030 if SFPC is to retain its TEN-T status.
- Completion of the Foynes to Limerick Road Improvement Scheme for external connectivity is fundamental to the role of SFPC and Shannon International Airport as key access points serving Ireland's external trade and tourism interests.
- Indecon estimate that the overall value of trade handled by SFPC amounted to €8.43 billion in 2015. This trade, in addition to the direct and indirect impact of port-related activities, is estimated to support a total of 104,447 full-time equivalent jobs directly and indirectly across the Irish economy.
- Unprecedented levels of investment at SFPC's ports and on the estuary are set to continue with €1.8bn in capital expenditure planned for the lifetime of SFPC's Masterplan, Vision 2041.
- In excess of €200m has been invested by the port and its customers from 2009 – 2014 and it is projected that an additional €277m will be invested in the period 2014 – 2019.
- The Port of Foynes, alongside the planned development of a deep-water terminal at Foynes Island, will play a primary role in meeting the expected growth in demand and in responding to market requirements, including the ability to handle the largest vessels. Under its mid-line growth scenario, the port's strategy envisages that trade handled at the Port of Foynes and associated facilities on Foynes Island would expand from 1.7 million tonnes in 2015 to 2.8 million tonnes in 2025 and to reach an estimated 3.6 million tonnes by 2041.

4.0 A PORT OF INTERNATIONAL & NATIONAL STANDING

4.1 International Significance

Significantly, SFPC is recognised by the European Commission as one of the three core ports in Ireland under the Trans-European Transport Network (TEN-T). For inclusion in the core network, ports must enjoy significant volumes of freight and have a high level of international connectivity. 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. Funding has been secured under the EU's Connecting Europe Facility (CEF), a €26.25 billion fund that is being made available from the EU's 2014 – 2020 budget to co-fund TEN-T projects to ensure the cohesion, interconnection and interoperability of the trans-European transport network, as well as access to it. This approach is also in line with The European Maritime Transport Strategy 2018 which presents a ten year strategy for European Transport and outlines key objectives for the advancement of competitiveness in the European shipping sector.

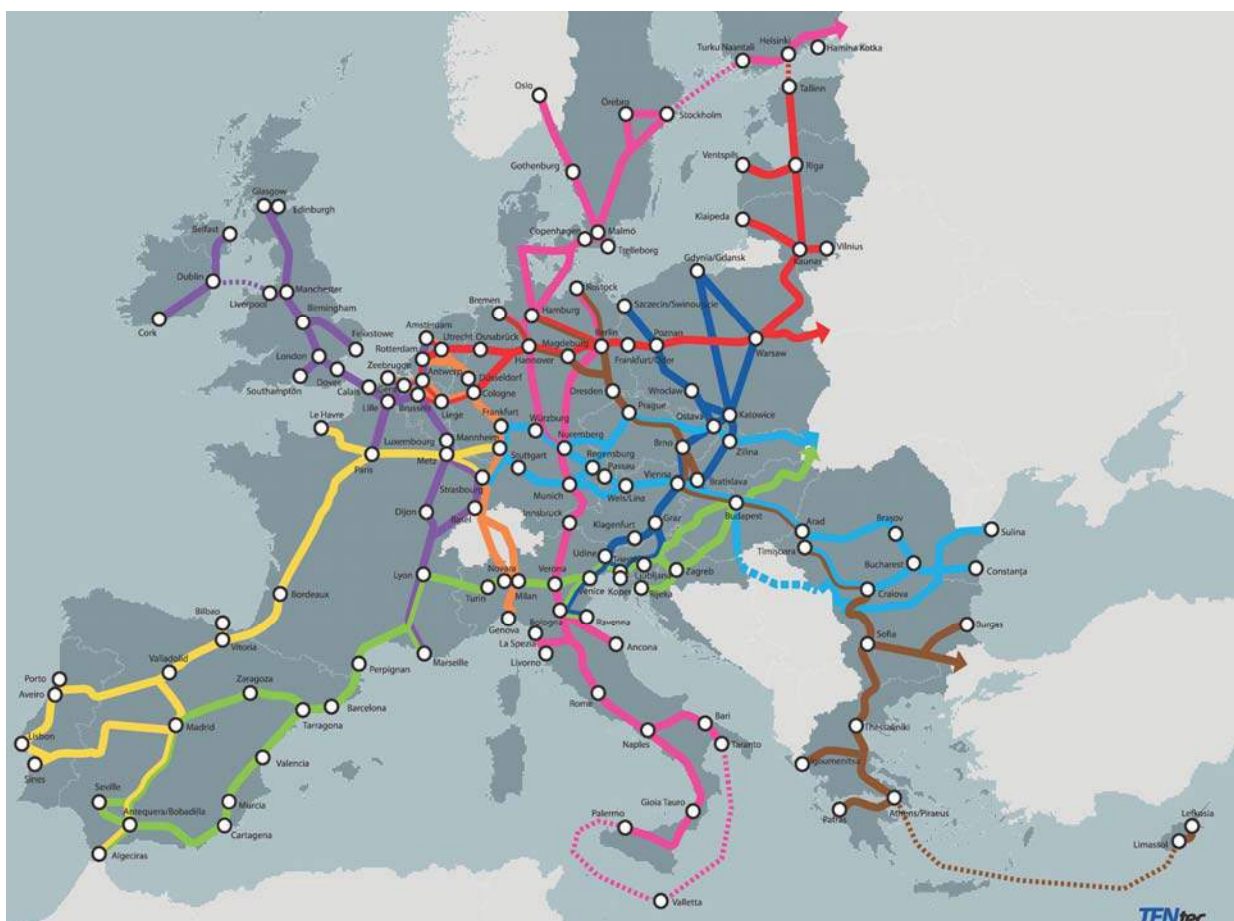


Figure 2.0 Trans – European Transport Network

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 with the World Economic Forum Global Competitiveness Report placing Ireland at number 23 in the world for the quality of port infrastructure, with a score of 5.3 of a possible 7.

4.2 National Significance

The long term international trend in ports and shipping is to consolidate resources in order to achieve optimum efficiencies of scale. National Ports Policy 2013 establishes a set of overarching principles to underpin a policy framework that will allow the commercial ports sector to develop in a sustainable manner. It recognises that the ports differ greatly in current capability and future potential. Commercial shipping in Ireland is centered on the three Tier 1 Ports of National Significance with SFPC identified as the second largest, in tonnage terms.

National Ports Policy 2013 is very clear in its central objective *“that those ports considered to be of national significance must be capable of the type of port capacity required to ensure continued access to both regional and global markets for our trading economy. Government expects the Ports of National Significance (Tier 1) to lead the response of the State commercial ports sector to future national port capacity requirements.* As a Tier 1 port, national ports policy effectively mandates SFPC to expand and grow as demand requires and to ensure investment in ports meets port capacity requirements. In order for SFPC to fulfil the objective of the National Ports Policy, the NPF must support and facilitate the development of SFPC port capacity and hinterland connectivity.

4.3 Regional Significance

Perhaps the single most important regional document to be prepared in terms of the Shannon Estuary is the inter-jurisdictional Strategic Integrated Framework Plan (SIFP). It provides a coherent spatial plan to recognise the economic potential of the Estuary and is significant in that it has ‘buy in’ from all relevant stakeholders and policy makers. SIFP aims to support the multifunctional nature of the Shannon Estuary and facilitate diversification of the economy through the promotion of commercial/industrial employment and maritime energy over a thirty year horizon. It seeks to transform the estuary into an international economic hub by taking advantage of what are among the deepest and sheltered harbours in Europe and the world. It has identified an additional 1,200 hectares for port development (9 no. strategic development locations) by building on existing industry connectivity and synergy as well as the existing infrastructure to create more sustainable and attractive network for further investment.

These Strategic Development Locations (SDLs) are a unique national maritime asset as the land within the SDLs adjoins specifically identified sheltered deepwater (>15m depths) sites on the Shannon Estuary. Supporting these SDLs, the relevant local authorities have adopted the recommendations of the SIFP by varying their County Development Plans and by zoning the land within these SDLs for marine related development. It is intended that these SDLs will attract substantial maritime commerce consistent with the Governments Harnessing our Ocean Wealth assisting in achieving its economic targets. The recent W2 Economic Impact Assessment found that based on attracting one major multinational to a SDL, comparable to existing (port) and operational patterns, a company with direct employment levels of 450 personnel would have an overall employment impact of 851 FTE’s stimulating over €55m annually in employment income¹.

The 9 designated Strategic Development Locations (SDLs) serve to act as catalysts during the lifetime of the NPF, to act as game changers in regional development and position not only the Mid West region but Ireland as a global marine transport hub. These SDLs are a unique national maritime asset as the land within the SDLs adjoins specifically identified sheltered deepwater (>15m depths) sites on the Shannon Estuary. Supporting these SDLs, the relevant local authorities have adopted the recommendations of the SIFP by varying their County Development Plans and by zoning the land within these SDLs for marine related development. It is intended that these SDLs will attract substantial

¹ W2 Consulting Economic Impact Assessment of SFPC

maritime commerce consistent with the Governments Harnessing our Ocean Wealth assisting in achieving its economic targets.

The recent W2 Economic Impact Assessment established that based on attracting one major multinational comparable to existing (port) and operational patterns, a company with direct employment levels of 450 personnel would have an overall employment impact of 851 FTE's stimulating over €55m annually in employment income. Furthermore, W2 found with regard to the SDL's that *"the ability to attract a number of new industries based on an industry cluster approach can provide in excess of €123 million pa in employment income supporting 1,890 FTE's"*

The potential of SFPC and the SDLs identified in the SFIP, must be acknowledged by the NPF in devising its spatial growth plan for the country. The NPF must take account of the potential trade flows and trade growth of these unique maritime assets and not solely concentrate on population growth. SFPC facilitates a highly competitive and efficient gateway for trade for Ireland's global economy.

The continued recognition of SFPC, as a port of international standing, is critical in facilitating the continued improvement of port infrastructure nationally in Ireland. The NPF must recognise SFPC and the Shannon Estuary as a huge opportunity for the Mid West Limerick City region and Ireland by virtue of its deep waters which are unrivalled in a national and European context.

5.0 ECONOMIC SIGNIFICANCE AND SPHERE OF INFLUENCE

SFPC is a major economic driver for the region as demonstrated by the Economic Impact Assessment published last August by W2 Consulting. The Economic Impact Assessment found that in the period 2015 – 2019, SFPC and its customers will invest €277m in capital expenditure supporting 3,372 jobs in the regional economy alone. The Port of Foynes is nearing full capacity and consequently a further 38 hectares of land has been acquired to further expand port facilities. With a market share of over 35 per cent of Ireland's bulk market, SFPC is a critical hub in Ireland's supply chain. Due to the persistently clear trend of larger vessels, its unique advantage of uncongested deep water and its unrivalled ability to facilitate and manage vessels in the 200,000 ton range, SFPC has significant potential for growth. In order to realise this growth and deliver on its significant economic potential the NPF must clearly identify, support and promote its standing as a Tier 1 Port as prioritised in the 2013 National Ports Policy.

The independent Economic Impact Assessment examining the activities of SFPC and the wider impact of the commercial trading activity of the port, demonstrates the significance of SFPC to the national economy. Not only are port operations a significant contributor to the region's economy but they represent 1 per cent of Ireland's GDP. The economic impact headlines², based on 2014 data, cannot be ignored:

- The economic impact of all SFPC port related activity was €1.9 billion in 2014.
- The regional economic impact of SFPC and associated service providers is €95.8 million,
- The trade activity of SFPC and service providers supports 534 FTEs annually.
- The value of trade handled through SFPC for 2015 was €8.43 billion

² W2 Consulting Economic Impact Assessment of SFPC

- SFPC operations is responsible for 65 FTE's in addition to an employment income effect of €9.4 million for the regional economy.
- The commercial activity of customers of SFPC resulted in €347.2 million of expenditure in the regional economy on non labour goods and services.
- Projected capital expenditure over the course of Vision 2041 is calculated at €1.8 billion that will support over 22,000 FTE's in the region and stimulate a further €1.09 billion between indirect and induced expenditure.

The economic importance of SFPC to the regional and national economy is further evidenced by research undertaken by Indecon on behalf of SFPC. Based on the overall value of trade handled by SFPC, €8.43 billion in 2015, this trade, in addition to the direct and indirect impacts of port-related activities, is estimated to support a total of 104,447 full-time equivalent jobs directly and indirectly across the Irish economy³. However, Indecon highlights that ensuring that the port has the appropriate capacity and hinterland connectivity in place to support the future growth in its port trade volumes will be critical to increasing these economic impacts in the future.

The Shannon Estuary is one of Irelands greatest natural resources offering naturally deep and sheltered waters which facilitate the largest commercial shipping vessels on the island of Ireland The NPF must identify the Shannon Estuary as a key strategic maritime transport gateway. It must recognise the Shannon Estuary as an asset within the Mid West Limerick City region and the potential of that asset to strengthen and grow with appropriate investment. SFPC is substantially located in a rural area, but yet, is one of the regions foremost economic drivers. SFPC's investment plans will potentially attract thousands of jobs to the rural economies adjoining the Shannon Estuary and the NPF must plan for such growth in defining and promoting the Mid West Limerick city region.

6.0 STRENGTH OF PORT ACTIVITY IN THE MID WEST REGION

SFPC's Port Masterplan, *Vision 2041*, sets out the projected path for growth of port trade over a 30-year time horizon. The strategy envisages that future growth will arise from a combination of organic growth in existing bulk trade sectors, particularly in relation to agricultural, liquid fuel and biomass commodities, as well as through growth in the energy and renewables sector.

There are three key objectives within *Vision 2041*, including expansion, promotion and management. These include:

- Significant expansion and infrastructure development in the deepwater Port of Foynes including port development at Foynes Island;
- Promoting Limerick Port as a working port and developing the non-core assets in Limerick Docks for alternative commercial port / non-port related activities; and
- Managing and promoting the naturally sheltered deepwater Strategic Development Locations identified in the SIFP for large scale port related investment including designating the Estuary as an Ocean Energy Hub.

Achieving the objectives of *Vision 2041* and the associated growth in tonnage is critically dependant on the timely investment and delivery of critical infrastructure such as:

³ Indecon International Economic Consultants

- The Foynes to Limerick Road Improvement Scheme
- The reinstatement of the Foynes to Limerick rail freight corridor
- The upgrade of all utilities including gas, electrical supply and IT services required to attract and support a cluster of modern port related heavy industries

6.1 Port of Foynes

The Port of Foynes, alongside the planned development of a deep-water terminal at Foynes Island, will play a primary role in meeting the expected growth in demand and in responding to market requirements, including the ability to handle the largest vessels. Under its mid-line growth scenario, the port's strategy envisages that trade handled at the Port of Foynes and associated facilities on Foynes Island would expand from 1.7 million tonnes in 2015 to 2.8 million tonnes in 2025 and to reach an estimated 3.6 million tonnes by 2041.

During the period 2015-2016 alone over €45m was invested in the port estate in Foynes by SFPC and the private sector. These investments include a new biomass plant built by CPL as well as the construction of new covered and uncovered storage facilities. Currently, Bord Na Mona has received planning approval to build its own biomass plant in Foynes. Crucially these biomass investments strongly establish Foynes port as Ireland's biomass hub. Several hundred new permanent jobs will be created as a direct result of these investments.

Vision 2041 identifies the overall land requirement to facilitate port expansion and since Vision 2041 was adopted, the Limerick County Development Plan has been varied to facilitate additional zoning of land adjoining the port for marine related development. All land within the Port of Foynes is now developed. SFPC is currently preparing a planning application, falling under the provisions of Strategic Infrastructure Development, for a significant extension to its berthing facilities in the Port of Foynes and the expansion of port facilities to the east comprising in excess of 38 hectares of land. In addition to the aforementioned, Vision 2041 also identifies the requirement for a new deepwater berth on Foynes Island in order to provide the required port capacity to service the projected doubling of tonnage throughput to 3.6 million tonnes by 2040. These investments will continue to be funded by the Port and the private sector.

Reinstatement of the Limerick to Foynes Railway line, linking Ireland's deepest port to the national rail network, is under consideration. The logistical and market-related constraints of rail freight are likely to mean that the rail link will be user specific but in the intervening period it is important that the rail line is recognised in the NPF as a national strategic freight link.

6.2 Limerick Docks

Limerick Docklands represents a key expansion area for Limerick City. The port lands stretches for 2.15 kilometres along the waterfront with the River Shannon to the north and the Dock Road (N69) to the south. The future development potential of Limerick Docklands is obvious with 30.8 hectares of land to be developed and a number of established historic buildings surplus to port operation requirements. SFPC intends to launch its collaborative Limerick Framework Strategy shortly coordinating the development of its extensive port and non-port assets at Limerick.

The SFPC vision for the Docklands seeks to, *"Use a focused approach, to reconnect Limerick Docklands with the city and the motorway, to maintain the working docks and to effectively re-develop lands and buildings which are no longer central to the core operations of Ted Russell Dock, with a focus on the development of a Limerick Docklands Economic Park"*.

From an economic perspective, the Mid West Limerick City region must capitalise on its unique marine setting with potential for high technology use. The Estuary and the port facilities, particularly in Limerick Docks should be promoted for the testing, research, manufacture, storage, assembly and deployment of marine energy devices and other technological devices.

6.3 Shannon Estuary - Maritime & Energy Infrastructure

The Shannon Estuary is a unique resource for Ireland as it is the only waterbody in Ireland and one of the few across Europe that can facilitate the largest ships. SFPC is capable of and already handles the biggest ships in the world in the range of 200,000 tons. With new ship builds trending ever larger⁴ this advantage is now becoming much more relevant than heretofore. Accordingly, there exists real potential to develop the Estuary as a maritime deep sea hub which could facilitate key sectors such as energy, agriculture and industry. This potential has been recognised by the SIFP as previously detailed in Section 4.3 of this report. The consequent inward investment and job creation that could be generated together with aligning the other key assets of the region such as the university sector and Shannon Airport offer a real solution for regional development counterbalancing the Greater Dublin area.

The growth of maritime industries within the Estuary has served to create a synergism focused on the natural waterway of the Estuary. Large-scale coal, oil and gas generating stations at Moneypoint, Tarbert and Aughinish along with existing 400 kV, 220 kV, 110 kV and 38 kV grid and the liquid natural gas (LNG) terminal which has been granted planning permission, facilitates the growth of energy infrastructure. These synergies are forming a strong basis for attracting further economic development, trade and investment, all based on the 'unique selling point' of the proximity to deep water.

There are two visible or emerging clusters of maritime industry on the Shannon Estuary with the first cluster concentrated broadly around Moneypoint / Tarbert / Ballylongford, and the second cluster focused around Foynes / Aughinish / Cahiracon. They have become broad focal points for the concentration of marine related industrial development. Business on the Estuary is supported by an important transport link, a ferry crossing which facilitates the movement of people between the northern and southern shores of the Estuary and effectively connects the N67 with the N69.

The Estuary is recognised as a significant economic driver in the region with strong economic and development policies focused on growing its potential. This is very much recognised by the Universities in the region as they have launched a suite of complementary undergraduate energy programmes thereby expanding the population of skilled workers and graduates with energy knowledge/training. They have also signed a memorandum of understanding with a group of leading firms in Silicon Valley with the aim of creating a "world-class cluster" of sustainable and renewable energy companies between Galway and Limerick. This initiative has been named the Shannon Energy Valley.

SFPC continues to work closely with national bodies and organisations to promote and market the Shannon Estuary as Europe's Ocean Energy Hub, particularly in terms of providing a land base to access and service generating platforms, including deep water. The Ocean Energy Hub is not only promoted on the facilities provided by the Shannon Estuary but also on the positive attributes of the wider region, including; access to the largest wave energy resource in Europe; access to the best wind energy regime in Europe; its close proximity to Shannon International Airport; the proximity to the Askeaton Business Park, the benefits derived from Limericks gateway designation and its advanced third level institutions; access to electricity grid and gas supplies; and supports and incentives for new enterprise.

⁴ Globalisation Transport and the Environment, OECD

The NPF must recognise that the potential of the marine economy cannot be considered in isolation but rather must be considered in a wider socio-economic context, building on the potential of the region and the potential of existing and future commercial synergies, including the Port of Foynes, Limerick Docklands and the potential of the SDL's on the Shannon Estuary to become a significant economic hub in the country.

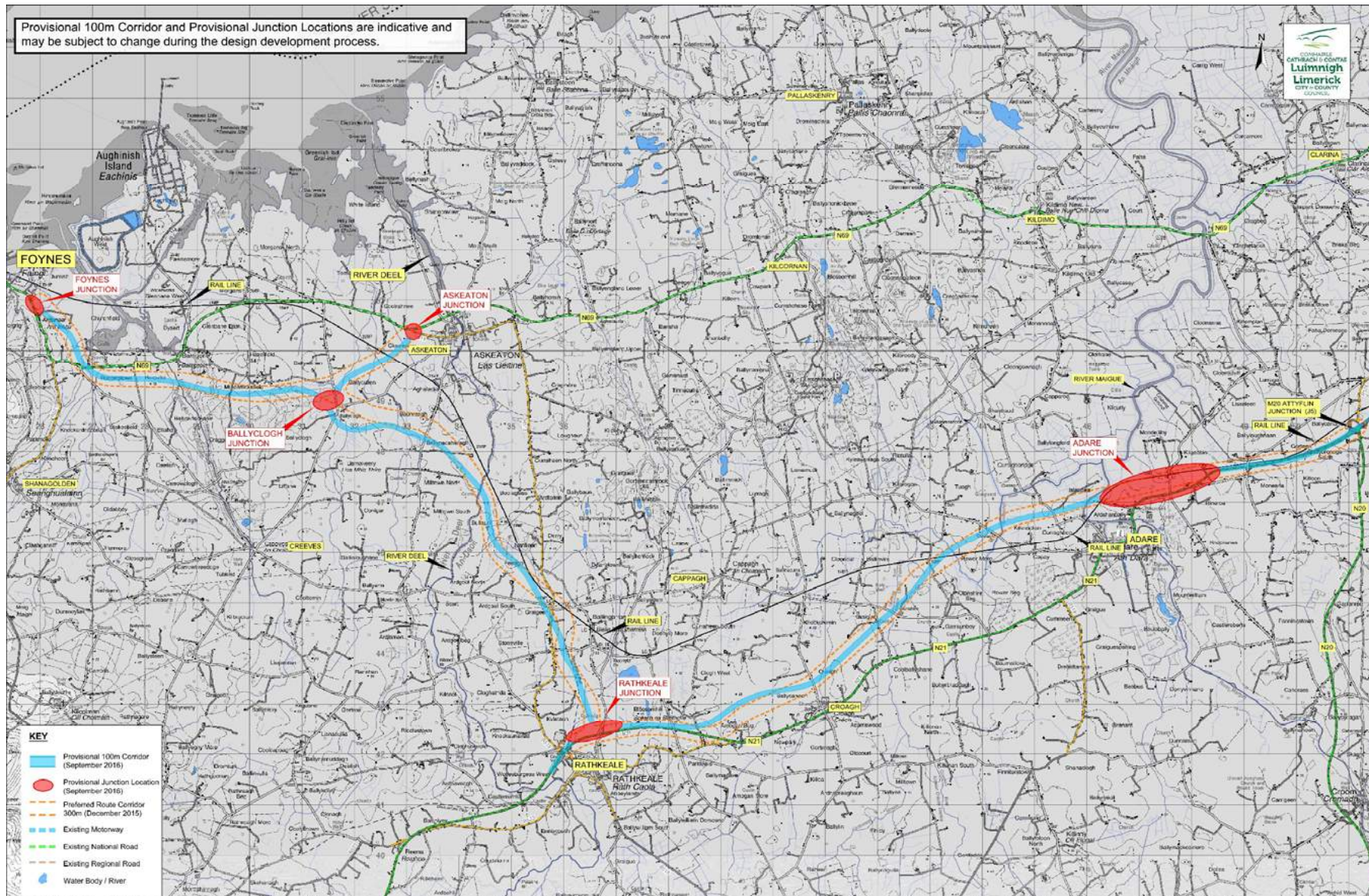
7.0 BARRIERS TO GROWTH – CONNECTIVITY AND LINKS

The Department of Transport clearly recognises in its National Ports Policy Document that ports can act as engines of regional economic growth and that “*significant shortfalls in port infrastructure capacity could result in serious damage to the economy*”. The 2015 report ‘Strategic Investment Framework for Land Transport, published by Minister Paschal Donohoe notes three key priorities when it comes to investing in our transport future, one of which states that we must “maximise the contribution of the land transport network to our national development vis targeted investments to improve connections to seaports and airports”. It is thus clear that core infrastructural requirements to facilitate port expansion must be actively promoted in the region.

The N20/21 and N69 represent key strategic routes serving the Shannon Estuary, including Limerick City, and the wider West Limerick and North Kerry region. The N69 route links Limerick City with Listowel and Tralee, while the N21 to the south of Limerick City provides the main route to/from North Kerry and the South West. Foynes is home to Shannon Foynes Port and the area surrounding Foynes hosts a number of major industry sites. The N69 also serves as the coastal route to the south of the Shannon Estuary and links to/from the key tourism asset that is the Wild Atlantic Way.

However, both the existing N69 and N21 routes suffer from particular deficiencies, including often severe traffic congestion, accident/safety issues, and vulnerability to weather events, with risk of closure during extreme events. The N69 in particular does not meet the standards of reliability and connectivity required to serve a port with the status of Shannon Foynes; to support foreign and indigenous investment; and to maximise the tourism potential of the West Limerick and wider region.

In response to the above issues, Limerick City and County Council, through the Mid-West National Roads Design Office/Transport Infrastructure Ireland (TII), have been working to address these deficiencies through completion of the Foynes to Limerick Road Improvement Scheme. A route selection report for the scheme, detailing the selection of the preferred route corridor for the scheme, was published in June 2016 and an application is likely to be made to An Bord Pleanála later this year.



This road project must be prioritised in the NPF as the costs of non-delivery are just too great. There are significant economic benefits, in addition to the transport-related road user benefits and construction employment benefits, that would rise through completion of the scheme.

1. As Ireland's second most important port and as a Core Network Port under the EU's TEN-T network, it is critical that Shannon-Foynes Port has adequate hinterland connectivity to support its planned growth. In the absence of an appropriate standard road link to/from the Port of Foynes in particular, the expected growth in port trade would not be feasible, while a failure to support the development of the port would mean substantial costs in terms of port trade growth that would otherwise be lost. It would also harm national competitiveness and the environment as a result of additional inland transport costs and emissions that would be faced.
2. The Foynes to Limerick Road Improvement Scheme would also play a catalytic role in supporting the realisation of important potential wider economic development benefits. This is particularly the case in relation to how the scheme would enhance the accessibility and marketability of Strategic Development Locations in the Foynes/Shannon Estuary area for foreign and indigenous investment and job creation in the maritime energy and other economic sectors.
3. The scheme would also support the development of tourism in the region, including in the West Limerick and Shannon Estuary areas, and would in particular boost the potential to attract more visitors and increase visitor spending along the Wild Atlantic Way.

Indecon, on behalf of SFPC, undertook an analysis of the economic impact of the N69 Improvement Road Scheme. Indecon is of the view that there exists a strong economic rationale for supporting the completion of the Foynes to Limerick Road Improvement Scheme. Of significance, the study notes that the TEN-T regulations, underpinning Shannon Foynes Port's status as an EU TEN-T Core Network Port, includes an explicit requirement that the road network serving a core network port must comprise either motorway or 'express' standard roads. Such connectivity must be in place by 2030 if Shannon Foynes is to retain its TEN-T status.

The Port of Foynes, which is Shannon Foynes Port Company's primary general cargo port, is currently entirely dependent on the N69 and the R521 to facilitate the inland movement of goods between the port and its customers. Indecon's assessment demonstrates that a failure to provide the Foynes to Limerick Road Improvement Scheme would undermine Shannon Foynes Port Company's plans to expand its capacity at the Port of Foynes. This is because in the absence of an appropriate road link, the expected growth in port trade would not be feasible. And, by constraining the port's ability to respond to market and port sector developments, once the port's current capacity limit is reached, the port would lose overcapacity trade to other ports. Specifically, under a mid-growth scenario, Indecon estimate that a failure to develop the port would result in an estimated loss of trade from the Port of Foynes of up to 1.3 million tonnes annually, or 37% relative to projected port traffic in 2041. This potential loss in future trade would be equivalent to €5.5 billion in present value terms when the annual losses are cumulated over a 20-year period.

An 'access strategy' for the ports must be developed within the region, consistent with European and national transport policy and certainty must be provided around the delivery of the Foynes to Limerick Road Improvement Scheme. Potential investors require clarity and certainty and delivery of the Foynes to Limerick Road Improvement Scheme and the reinstatement of the Limerick to Foynes rail line for commercial freight purposes must be promoted as priority projects in the NPF.

8.0 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. Any lessening or reduction in the status of SFPC as a national Tier 1 port through regional prioritisation would undermine national and international ports policy. The significance of the ports and SFPC must be recognised, encouraged, supported and overall must be actively promoted in the NPF, if their full economic potential is to be realised in the future. This can be achieved in part through recognition of SFPC's standing as a Tier 1 Port as prioritised in the 2013 National Ports Policy.

This submission has highlighted four key requirements for the NPF including:

1. The continued recognition of SFPC, as a port of international standing, is critical in facilitating the continued improvement of port infrastructure nationally in Ireland. The NPF must recognise SFPC and the Shannon Estuary as a huge opportunity for the Mid West Limerick City region and Ireland by virtue of its deep waters which are unrivalled in a national and European context
2. The NPF must identify the Shannon Estuary, its ports and future development as a significant economic driver and transport corridor in the region. It must recognise the Shannon Estuary as an asset within the Mid West Limerick City region and the potential of that asset to strengthen and grow by attracting substantial private sector port related investment. SFPC is substantially located in a rural area, but yet, is one of the regions foremost economic drivers. SFPC's investment plans will potentially attract thousands of jobs to the rural economies adjoining the Shannon Estuary and the NPF must plan for such growth in defining and promoting the Mid West Limerick city region.
3. The NPF must recognise that the potential of the marine economy cannot be considered in isolation but rather must be considered in a wider socio-economic context, building on the potential of the region and the potential of existing and future commercial synergies, including the Port of Foynes, Limerick Docklands and the potential of the Shannon Estuary to become a significant energy hub in the country. In this regard much of the connectivity infrastructure is already in place, with the high voltage power lines and national gas grid are already in situ.
4. An 'access strategy' for the ports must be developed within the region, consistent with European and national transport policy. Potential investors require clarity and certainty and delivery of the Foynes to Limerick Road Improvement Scheme must be promoted as a priority project in the NPF. The Limerick to Foynes Railway links Ireland's deepest port to the national rail network and this line should be recognised in the NPF as a national strategic freight link.