

Chapter 2

Policy Context and Need for the Proposed Road Development

2.1 Introduction

This chapter of the EIAR addresses the need for the proposed Foynes to Limerick Road (Including the Adare Bypass) under the following headings:

- Policy background (Section 2.2);
- Associated studies (Section 2.3); and
- Existing road network (Section 2.4).

It concludes with an overview of the need for the proposed road development (Section 2.5) and a statement of its objectives (Section 2.6).

2.2 Policy Background

The need for a higher quality access to Shannon-Foynes Port has been identified in a number of European, National, Regional and Local transport and planning policy documents. The most relevant policies and objectives in the principal documents are discussed in the following sections and are listed below:

European Policy:

- TEN-T - The Trans-European Transport Network – Transport
- TEN-T Policy for Ports
- Ports 2030 – Gateways for the Trans European Transport Network
- TEN-T Policy for Roads
- TEN-T Policy for Rest Areas

National Policy:

- National Ports Policy (2013)
- Harnessing our Ocean Wealth (2012)
- Project Ireland 2040
 - National Planning Framework (2018)
 - National Development Plan (2018 – 2027)
- Road Safety Strategy (2013 -2020)
- Smarter Travel: A Sustainable Transport Future (2009 - 2020)
- National Cycle Policy Framework (2009)
- Building on Recovery: Infrastructure and Capital Investment (2016 – 2021)

Regional Policy:

- Draft Regional Spatial & Economic Strategy for the Southern Region (2019–2031)
- Mid-West Regional Planning Guidelines (2010-2022)
- Mid-West Area Strategic Plan (MWASP) (2012 – 2030)
- Strategic Integrated Framework Plan for the Shannon Estuary (2013 – 2020)

- Shannon-Foynes Port Company Masterplan – Vision 2041 (2013)

Local Policy:

- Limerick County Development Plan (2010 – 2016 as Extended to 2020)
- Kerry County Development Plan 2015-2021
- Adare Local Area Plan 2015-2021

2.2.1 European Policy

This Section outlines the European policy documents which have influenced the design of the proposed road development. They are as follows:

- TEN-T - The Trans-European Transport Network – Transport
- TEN-T Policy for Ports
- Ports 2030 – Gateways for the Trans European Transport Network
- TEN-T Policy for Roads
- TEN-T Policy for Rest Areas

2.2.1.1 TEN-T - The Trans-European Transport Network - Transport

The European Union Trans-European Network - Transport (TEN-T) is a European Commission policy directed towards the implementation and development of a Europe-wide network of roads, railway lines, inland waterways, maritime shipping routes, ports, airports and rail-road terminals. It consists of two levels of transport networks:

- The Core Network: Most important connections within the Comprehensive Network linking the most important locations or nodes within the European Union;
- The Comprehensive Network: Covering all European regions.

The ultimate objective of TEN-T is to address existing deficiencies, close gaps, remove bottlenecks and eliminate technical barriers that exist between the transport networks of EU Member States, thereby strengthening the social, economic and territorial cohesion of the Union and contributing to the development of a single European transport area. The policy seeks to achieve this aim through the construction of new physical infrastructures; the adoption of innovative digital technologies, alternative fuels and universal standards; and the modernising and upgrading of existing infrastructures and platforms.

The policies for the Trans- European Transport Network are expressed in Regulation (EU) No 1315/2013 (the TEN-T Regulations) specifically in relation to:

- TEN-T Ports
- TEN-T Road Network
- TEN-T Rest Areas

TEN-T Core Network

The Core Network will form the backbone for transportation in the European Single Market. Targeted for completion by 2030, it will remove bottlenecks, upgrade infrastructure and streamline cross border transport operations for passengers and businesses throughout the EU. Implementation will be progressed by the setting up of 9 major transport corridors that will bring together Member States. The TEN-T Core Network will contribute to enhancing internal markets, strengthening economic, social and territorial cohesion and reducing greenhouse gas emissions.

The Core Network comprises 9 major transport corridors extending across Europe. In Ireland the Core Network forms part of 1 of these 9 major transport corridors, which is referred to as the *North Sea-Mediterranean Corridor*. This corridor stretches from Ireland through the UK, Netherlands, Belgium, Luxembourg and onto the Mediterranean Sea in the south of France. Plate 2.1 highlights the TEN-T Core Network in Ireland and the UK including the Limerick connection to the Cork - Dublin corridor.



Plate 2.1 Ireland and the EU TEN-T Core [Road] Network

TEN-T Comprehensive Network

The TEN-T Core Network is supported by a Comprehensive Network of routes, feeding into the Core Network at regional and national level. The target for completion of the Comprehensive Network is 2050. Plate 2.2 shows the extent of both the Core and Comprehensive Transport Networks in relation to roads, ports and airports within the Mid-West Region.



Plate 2.2 Ten-T Core (Orange) and Comprehensive Network (Green) in the Mid-West Region

2.2.1.2 TEN-T Policy for Ports

The four Core Ports identified within Ireland are:

1. Dublin;
2. Belfast;
3. Cork; and
4. Shannon-Foynes.

Article 41(2) of the TEN-T Regulations with regard to transport infrastructure requirements states that Member States shall ensure that:

“Maritime ports of the core network [...] shall be connected with the railway and road and, where possible, inland waterway transport infrastructure of the trans-European transport network by 31 December 2030, except where physical constraints prevent such connection.”

Actions of the policy include providing support to projects which contribute to the coordinated development and management of ports, rail and inland waterways infrastructure and those which enhance port and shipping environmental performances.

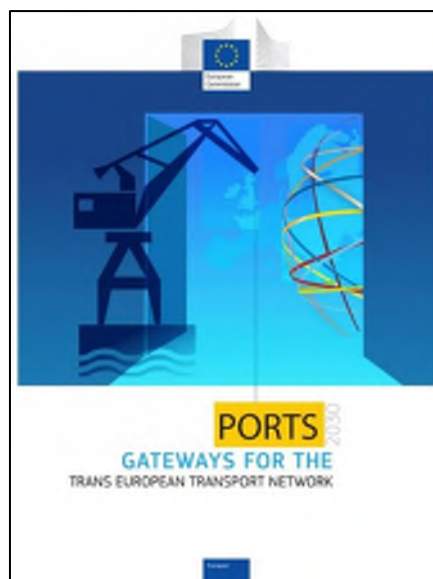
2.2.1.3 Ports 2030 – Gateways for the Trans European Transport Network

In September 2013, the European Commission published a communication document and implementation plan on its policy for European Ports. This communication examines the drivers behind port development and what steps need to be taken to address the deficiencies in the port network. The document states:

“The success of a good port is a solid connection to its immediate surrounding inland area: its hinterland” (Foreword).

“This revised European Port Policy covers the trans-European transport network seaports which account for 96% of freight and 93% of passengers transiting through ports in the Union” (p. 4).

“In partnership with the Member States, the Commission will streamline transport projects funded under the Structural and Cohesion Funds with the TEN-T, promoting priority to projects for port access and hinterland connections” (p. 9).



The document recognises that investment in port facilities is required now to remain competitive for the future and to make the best possible use of our port assets, which require efficient and quality port services. The document further states that:

“If nothing is done an opportunity will be missed to increase options available to transport operators and shippers and create growth and jobs in coastal areas and across the Union as a whole” (p. 4).

The above European Ports policy therefore recognises the important role that the development of ports and their surrounding infrastructure has, as a driver for economic growth and employment in the surrounding region. Actions of the policy include providing support to projects which contribute to the coordinated development and management of ports, rail and inland waterways infrastructure, and those which enhance port and shipping environmental performances.

2.2.1.4 TEN-T Policy for Roads

Regulation (EU) No 1315/2013 sets out the requirements for high quality roads that shall form part of the TEN-T network, both Core and Comprehensive, and states under Article 17(3), the following:

“High-quality roads shall be specially designed and built for motor traffic, and shall be either motorways, express roads or conventional strategic roads.

- (a) A **motorway** is a road specially designed and built for motor traffic, which does not serve properties bordering on it and which:
- (i) is provided, except at special points or temporarily, with separate carriageways for the two directions of traffic, separated from each other by a dividing strip not intended for traffic or, exceptionally, by other means;
 - (ii) does not cross at grade with any road, railway or tramway track, bicycle path or footpath; and
 - (iii) is specially sign-posted as a motorway.

- (b) An **express road** is a road designed for motor traffic, which is accessible primarily from interchanges or controlled junctions and which:
- (i) prohibits stopping and parking on the running carriageway; and
 - (ii) does not cross at grade with any railway or tramway track.
- (c) A **conventional strategic road** is a road which is not a motorway or express road, but which is still a high-quality road.”

Article 38(1) of the TEN-T Regulations specifies that:

“The core network, as shown on the maps contained in Annex I, shall consist of those parts of the comprehensive network which are of the highest strategic importance for achieving the objectives of the trans-European transport network policy, and shall reflect evolving traffic demand and the need for multimodal transport. It shall, in particular, contribute to coping with increasing mobility and ensuring a high safety standard as well as contributing to the development of a low carbon transport system.”

Article 39(2) of the Regulations sets out that, for the Core Network, only (a) a motorway, or (b) an express road, may be considered as road option types.

Article 17(4) of the Regulations lists the associated infrastructure which may be included with the above-stated high-quality roads, as follows:

“Equipment associated with roads may include, in particular, equipment for traffic management, information and route guidance, for the levying of user charges, for safety, for reducing negative environmental effects, for refuelling or recharging of vehicles with alternative propulsion, and for secure parking areas for commercial vehicles.”

TEN-T Road Network in Limerick Region

The existing national road network in the Limerick Region that may form parts of the TEN-T Network is shown in Plate 2.3 below and includes the following routes:

- N69 national secondary road between Tarbert and Limerick City on the TEN-T Core Network; and
- N21 national primary road between Abbeyfeale and Attyflin on the TEN-T Comprehensive Network.

These national routes are required to be augmented or modified in future improvement schemes to fulfil the requirements of the TEN-T Network.

In terms of geographical location, the N69 and N21 road corridors are within 10km of one another in the vicinity of Askeaton and Rathkeale as illustrated in Plate 2.4. The possibility that synergies could therefore exist between the Core and Comprehensive elements of the TEN-T Network in this region was identified and the study area for this project included a wide region served by both the N69 and N21 routes so as to fully evaluate the scope for synergy.

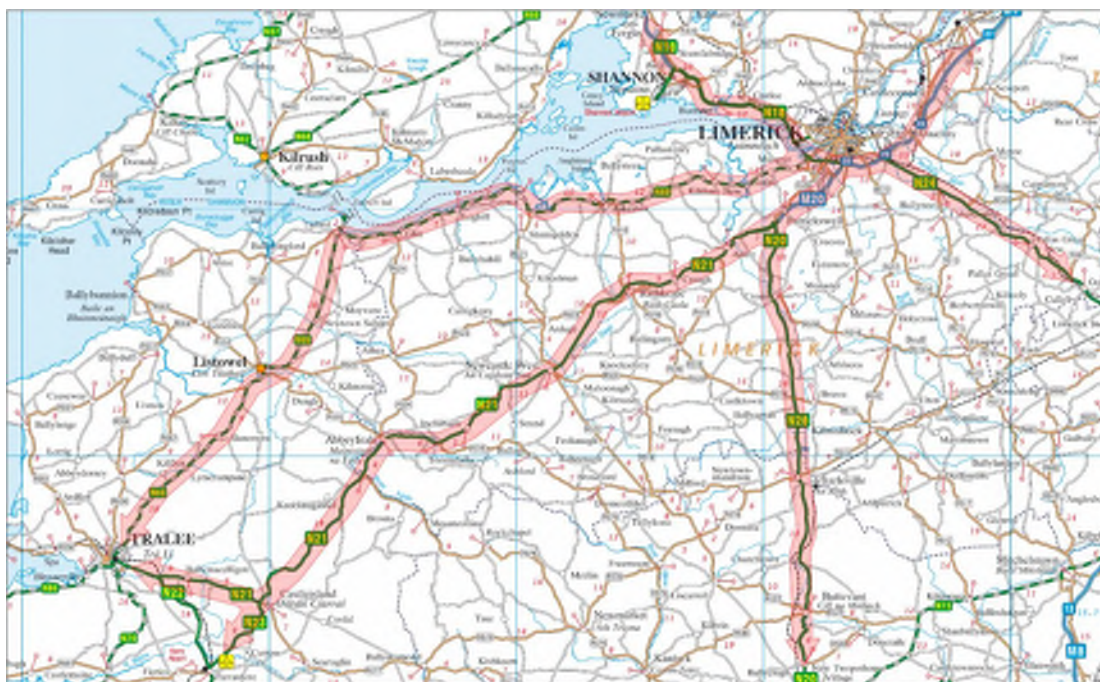


Plate 2.3 National Road Network in Limerick Region



Plate 2.4 Proximity of National Routes in Western Limerick

2.2.1.5 TEN-T Policy for Rest Areas

Article 39(2)© of Regulation (EU) No 1315/2013 sets out the requirements for rest areas on the TEN-T Network to include:

“[...] the development of rest areas on motorways approximately every 100 km in line with the needs of society, of the market and of the environment, in order inter alia to provide appropriate parking space for commercial road users with an appropriate level of safety and security”.

Of relevance to the provision of rest areas as required under the TEN-T Regulations, in August 2014 the TII published its *Service Area Policy* which addresses the application of the TEN-T policy in relation to service and rest areas within Ireland. The policy lists the major interurban routes including the Core and Comprehensive Road Network and lists the location and types of service and rest areas proposed. In relation to the Foynes to Limerick route the policy states the following:

“A Type 1 Service Area is proposed for the Limerick to Foynes route. This may be near the port in Foynes but depending on how the scheme evolves may be some distance from the port. Limerick County Council, in consultation with the Authority, will include consideration of the appropriate location for this service area as part of the scheme planning, currently underway”.

TII *Design Standard DN-GEO-03028 The Location and Layout of Service Areas* (TII, 2017) states that a Type 1 (Terminal) Service Area to be provided adjacent to ports *“shall provide parking, rest facilities and toilet/shower facilities as an absolute minimum and may include a main amenity building and/or fuel facilities based on an assessment of the demand for such services”* (p. 12).

2.2.2 National Policy Context

The following are relevant national, regional and local policies that have influenced the planning and design of this proposed road development:

- National Ports Policy (2013)
- Harnessing our Ocean Wealth (2012)
- Project Ireland 2040
 - National Planning Framework (2018)
 - National Development Plan (2018 – 2027)
- Road Safety Strategy (2013 -2020)
- Smarter Travel: A Sustainable Transport Future (2009 – 2020)
- National Cycle Policy Framework (2009)
- Building on Recovery: Infrastructure and Capital Investment (2016 – 2021)

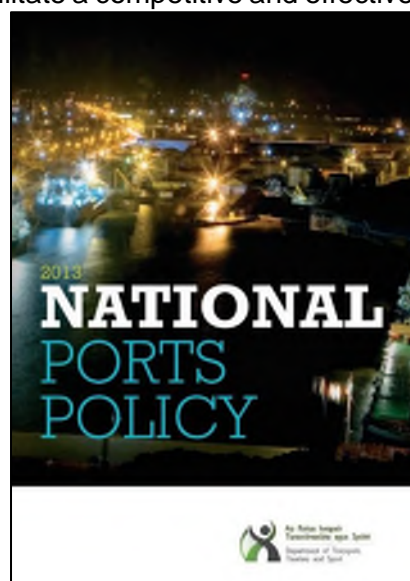
2.2.2.1 National Ports Policy (2013)

The core objective of the National Ports Policy is to facilitate a competitive and effective market for maritime transport services. The long-term international trend in ports and shipping is towards increased consolidation of resources in order to achieve optimum efficiencies of scale. This has knock-on effects in terms of vessel size, the depths of water required at ports and the type and scale of port hinterland transport connections.

In recognition of this, the National Ports Policy introduces clear categorisation of the ports sector into:

- Ports of National Significance (Tier 1);
- Ports of National Significance (Tier 2); and,
- Ports of Regional Significance.

Ports of National Significance (Tier 1) are ports that:



- Are responsible for 15% to 20% of overall tonnage through Irish ports; and,
- Have clear potential to lead the development of future port capacity in the medium and long term, when and as required.

As stated previously, the four ports which fulfil these criteria (and have been classified as Tier 1 Ports) are Dublin Port, the Port of Cork, Shannon-Foynes Port; and Belfast Port.

Shannon-Foynes Port is the largest bulk port in the country, handling approx., 20% of all seaborne trade in the State. The port's dominance in the dry-bulk sector is particularly pronounced, with a market share of around 63% in this sector. The National Ports Policy has, as a key strategic objective, the continued commercial development of Shannon-Foynes Port Company, and clearly identifies as a matter of reasonable priority, the improvement of the road and rail freight connections.

The National Ports Policy notes that efficient hinterland connections are critically important to any port's ability to facilitate large volumes of traffic. It states that all TEN-T Core Ports must have a connection to both TEN-T core road and rail networks, while recognising that:

“The vast majority of Ireland’s freight movements to and from ports are via road. As acknowledged in the European Commission’s White Paper, Roadmap to a Single European Transport Area – Towards a Competitive and Resource-Efficient Transport System, it is likely that “freight movements over short and medium distances (below some 300km) will to a considerable extent remain on trucks” (Commission of the European Communities 2011c)” (p. 45).

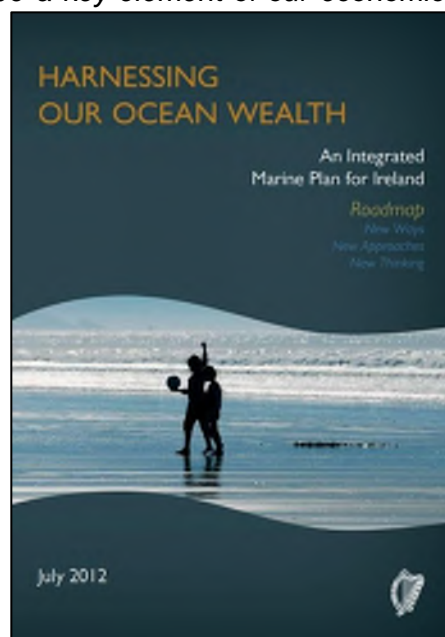
The provision of the proposed road development will support the Tier 1 status of Shannon-Foynes Port under the National Ports Policy.

2.2.2.2 Harnessing our Ocean Wealth (2012)

‘*Harnessing Our Ocean Wealth: An Integrated Marine Plan for Ireland*’ was published in July 2012 by the Department of Agriculture, Food and the Marine. It sets out a roadmap for the government’s vision, high level goals and integrated actions across policy, governance and business for the marine sector. It is recognised in the policy document (Foreword) that *“Our ocean wealth will be a key element of our economic recovery and sustainable growth, generating benefits for all our citizens”*. The policy also recognises the contribution which the ‘blue economy’ can make to global economic growth, and the need for appropriate policies, strategies and funding mechanisms to achieve this objective. The following targets are set for Ireland:

- Double the value of our ocean wealth to 2.4% of GDP by 2030; and
- Increase the turnover from our ocean economy to exceed €6.4bn by 2020.

To achieve these targets, the plan identifies that enabling infrastructure (e.g. ports, piers, the electricity grid and research infrastructure) is essential for harnessing our ocean wealth at national, regional and local levels.



Future growth opportunities identified within the plan which will enable the growth of the Shannon-Foynes Port include offshore oil and gas activity, cruise tourism and offshore renewable energy.

Key Actions identified include the following:

31. *“Maximise the utilisation of existing state maritime infrastructure [...] through multi-purpose usage and sharing, in support of operational programmes, research, test and demonstration and monitoring. (p. 43) [...]”*
34. *“Carry out national, regional and local initiatives aimed at tapping into the potential of new and existing coastal infrastructure to develop sustainable products, services and jobs. This would encourage investment along the coast. Initiatives include [...] Supporting major national seaports in the implementation of their master plans to provide additional capacity and greater draught using their own resources” (p. 43 – 44).*

The proposed road development will support the aims and targets of *Harnessing Our Ocean Wealth* by improving transport connectivity at Shannon-Foynes Port.

2.2.2.3 Project Ireland 2040

Project Ireland 2040 was launched by the Government in February 2018 and includes 2 elements:

- the National Planning Framework (2018), and
- the National Development Plan (2018-2027).

National Planning Framework (2018)

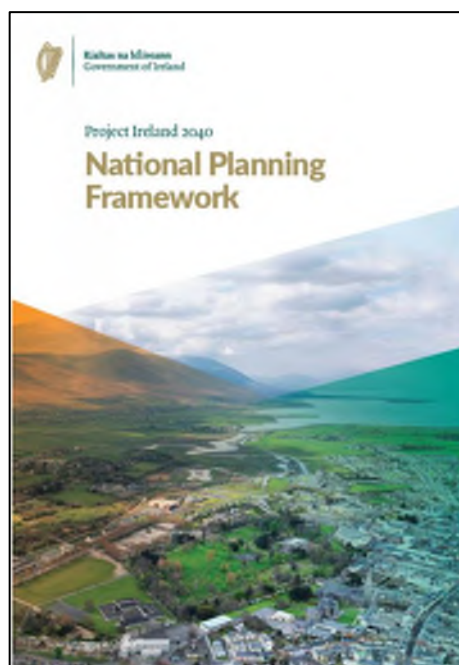
The National Planning Framework (NPF) succeeded the previous National Spatial Strategy and has a statutory basis. It is the Government's high-level strategic plan for shaping the future growth and development of Ireland to the year 2040.

The Vision of the NPF is illustrated in Plate 2.5 below, which is supported by multi-sectoral objectives.

The ambition of the NPF is to create a single vision and a shared set of goals for every community across the country. These goals are expressed in the Framework as National Strategic Outcomes (NSOs) and a range of multi-sectoral National Policy Objectives. The NDP has been developed to support the NPF in the delivery of the NSOs, as shown in Plate 2.6, below.

The NPF proposes to achieve this Vision by:

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;



- Supporting this with strengthened, more environmentally focused planning at local level; and
- Supporting the framework legally with an Independent Office of the Planning Regulator.

In the NPF, Ireland's five cities of Dublin, Cork, Limerick, Galway and Waterford will be targeted to accommodate 50% of overall national population growth with the other 50% growth coming from Ireland's towns, villages and rural areas. The Southern Region includes the three city-regions of Cork, Limerick and Waterford and their associated ports and the international airports, towns and rural hinterlands. The Mid-Western regional area which falls under the Southern Region is focused on Limerick City and the key employment and infrastructure assets at Shannon and Foynes. The document states that: "*Future growth will be based on leveraging national and international connectivity, higher education capacity and quality of life to secure strategic investment*" (p. 45).

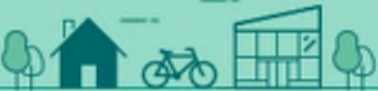
IRELAND 2040 VISION

1




A fair society with strong social cohesion and converging living standards throughout the country, in which all individuals, businesses, communities and regions have the opportunity to prosper.

2




More and sustainable choices and options for people, businesses and communities that can positively influence more sustainable patterns of living and working.

3




The highest possible quality of life for our people and communities, underpinned by high quality, well managed built and natural environments.

4




A creative, innovative and culturally attuned society, whose people, businesses and communities are equipped to further our national economic output and artistic endeavour.

5




Significant improvement in local and international connectivity that underpins the competitiveness and quality of life of our people, businesses, communities and regions.

6




A collaborative society in which our cities, towns, counties and regions engage in new partnerships that benefit people, communities and businesses, both locally and internationally.

7



Sustainable self-reliance based on a strong circular economy and significant progress towards a low carbon, climate-resilient society while remaining an open, competitive and trading economy.

8



To be the most successful, advanced, competitive and environmentally sustainable economy and society in Europe.

Plate 2.5 Vision of the National Planning Framework



Plate 2.6 NSOs and Strategic Investment Priorities of the National Planning Framework

Specific relevant sections of the NPF are presented below to demonstrate how the proposed road development will assist in the delivery of the desired outcomes.

NPF Section 7.3 – Ports

“National ports policy requires Tier 1 and Tier 2 ports, or ports of national and regional significance, to lead the response in meeting Ireland’s future port capacity requirements. There are major redevelopment projects taking place at our Tier 1

ports (i.e. Dublin, Cork and Shannon-Foynes) at present. These developments will result in a greater concentration of traffic through these ports, with implications for shore-based and marine-based infrastructure” (p. 102).

NPF Section 7.4 – Coastal Environment and Planning for Climate Change

“The role of [Tier 1 Ports] will be considered and addressed in tandem with long-term infrastructural requirements as part of the Regional Spatial and Economic Strategy and concurrent and subsequent metropolitan area or city/county development plan processes” (p. 103).

National Policy Objective (NPO) 40

“Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, metropolitan area and city/county development plans, to ensure the effective growth and sustainable development of the city regions and regional and rural areas” (p. 103).

As a case study (p. 105), the NPF includes the *Shannon Estuary Strategic Integrated Framework Plan* (detailed in Section 2.2.3.4).

The proposed road development will support the following NSOs:

NSO 2: Enhanced Regional Accessibility

“NSO 2 aims to build a more compact approach to urban development requirements by enhancing connectivity between centres of population of scale. Better accessibility between the four cities and to the Northern and Western region will enable unrealised potential to be activated as well as better preparing for potential impacts from Brexit” (p. 140).

Relevant objectives under this NSO 2 (p. 139) include:

- *“Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements” and*
- *“Improving average journey times targeting an average inter-urban speed of 90kph”.*

NSO 4: High-Quality International Connectivity

“As an island, the effectiveness of our airport and port connections to our nearest neighbours in the UK, the EU and the wider global context is vital to our survival, our competitiveness and our future-prospects. [...] In terms of our port facilities, National Ports Policy and the national hierarchy or tiering of ports recognises the long-term international trend in ports and shipping towards increased consolidation of resources in order to achieve optimum efficiencies of scale” (p. 142).

“The long-term sustainable development of our ports also requires strategic transport connections” (p. 142).

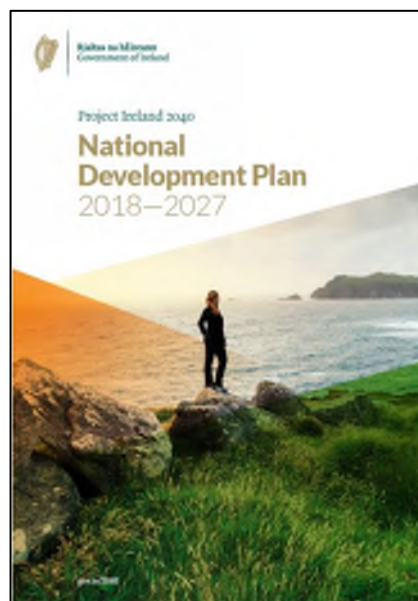
Accordingly, the following objective has been set out (p. 142):

“Improve land transport connections to the major ports including [...] Enhancing road connectivity to Shannon-Foynes Port, including local by-passes”.

National Development Plan (2018-2027)

The National Development Plan sets out the investment priorities that will underpin the successful implementation of the new National Planning Framework 2040 (NPF). The fundamental mission and purpose of the NDP is to set out the new configuration for public capital investment over the next ten years to secure the realisation of each of the ten NSOs, as set-out in the NPF. This will guide national, regional and local planning and investment decisions in Ireland over the next two decades to cater for an expected population increase of over 1 million people.

The National Development Plan demonstrates the Government's commitment to meeting Ireland's infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period.



A new funding model for Exchequer funded public investment is being put in place to ensure that resources are allocated to projects and programmes that meet NPF priorities. This includes a number of innovations being introduced in the NDP, including:

- Long-term (10-year) strategic approach to investment, in support of the 10 NSOs of the NPF;
- Sustained increase in investment share of national income to meet infrastructural needs;
- All Departments' capital programmes fully funded for 5-year period;
- Longer term key Strategic Investment Priorities funded to completion;
- Establishment of four new funds, with a combined allocation of €4 billion, to be allocated on a competitive basis for projects which meet the criteria of the funds; and,
- Establishment of a new National Regeneration and Development Agency to maximise the potential use of under-utilised land banks in cities and towns.

Under NSO 2, 'Enhanced Regional Accessibility', the NDP includes a range of investment actions and identifies the "N21/N69 Limerick to Adare to Foynes" (p. 41) as an investment priority under the inter-urban road category (see Plate 2.7).

Additionally, "capacity extension works at [Shannon-Foynes Port]" (p. 67) are also listed as priorities under NSO 6, 'High-Quality International Connectivity'.

"Strengthening access routes to Ireland's ports through investment to upgrade and enhance the road transport network to improve journey times is and remains a Government priority" (p. 68).

"The investment programme will improve international connectivity and increase capacity through the construction of new quay walls and associated port infrastructure and external connectivity with the upgrade of the N69 and the reinstatement of the Limerick-Foynes rail line" (p. 69).

The programme of investment by TII for roads under the NDP is illustrated for the whole of Ireland in Plate 2.8 and for the Mid-West Region in Plate 2.8a. The TII National Roads Programme 2018-2027 presents the route for the proposed Foynes to Limerick Road (including Adare Bypass) which differs from the route of the N69 and N21 presented in earlier policy documents. The TII Programme incorporates the Preferred Route Corridor for the Foynes to Limerick Road which emerged from the Route Selection Report for the proposed road development which was published in 2016.

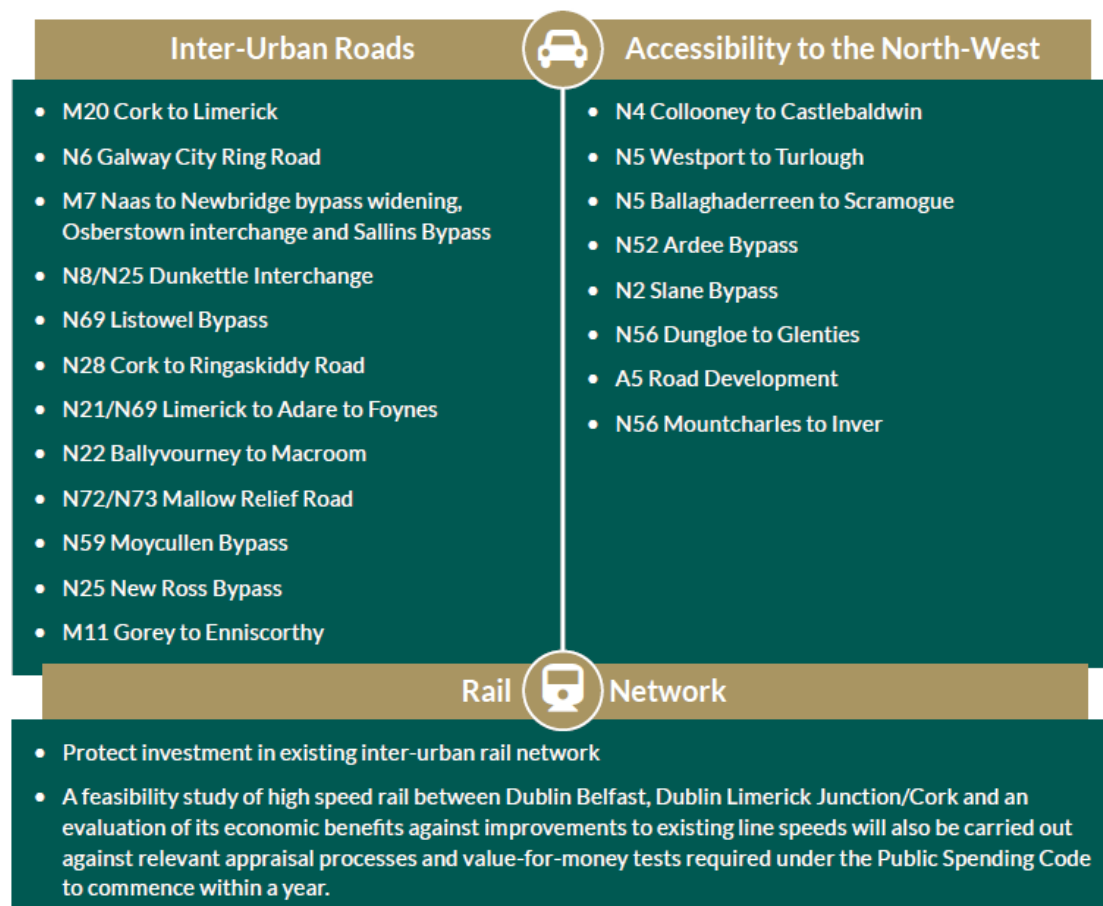


Plate 2.7 National Development Plan Strategic Investment Priorities (page 41)

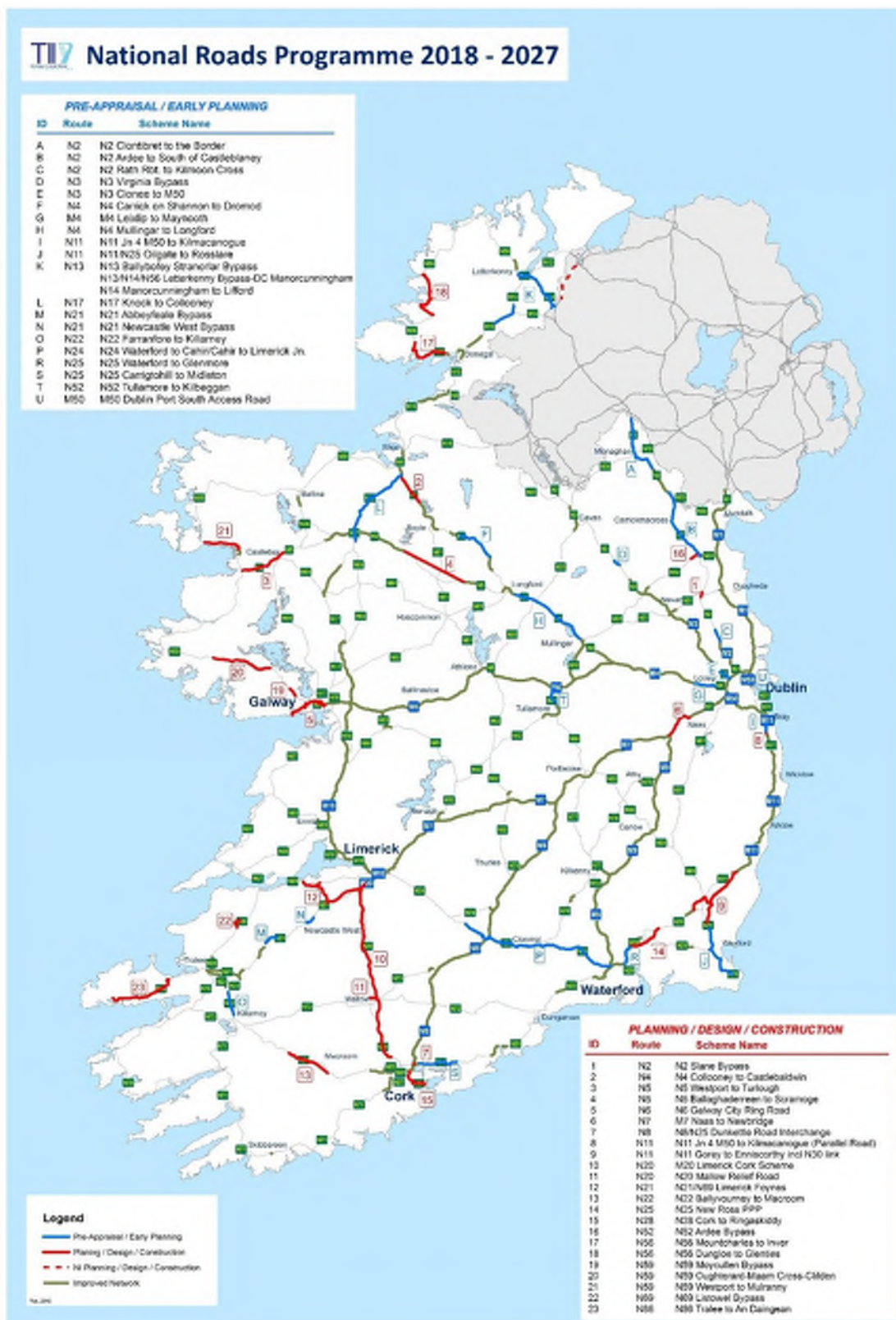


Plate 2.8 National Roads Programme 2018-2027 (TII, 2018)



PLANNING / DESIGN / CONSTRUCTION

ID	Route	Scheme Name
1	N2	N2 Slane Bypass
2	N4	N4 Collooney to Castlebaldwin
3	N5	N5 Westport to Turlough
4	N5	N5 Ballaghaderreen to Scramoge
5	N6	N6 Galway City Ring Road
6	N7	M7 Naas to Newbridge
7	N8	N8/N25 Dunkettle Road Interchange
8	N11	N11 Jn 4 M50 to Kilmacanogue (Parallel Road)
9	N11	N11 Gorey to Enniscorthy incl N30 link
10	N20	M20 Limerick Cork Scheme
11	N20	N20 Mallow Relief Road
12	N21	N21/N69 Limerick Foynes
13	N22	N22 Ballyvourney to Macroom
14	N25	N25 New Ross PPP
15	N28	N28 Cork to Ringaskiddy
16	N52	N52 Ardee Bypass
17	N56	N56 Mountcharles to Inver
18	N56	N56 Dungloe to Glenties
19	N59	N59 Moycullen Bypass
20	N59	N59 Oughterard-Maam Cross-Clifden
21	N59	N59 Westport to Mulranny
22	N69	N69 Listowel Bypass
23	N86	N86 Tralee to An Daingean

Plate 2.8a National Roads Programme 2018-2027 (NDP) in the Mid-West Region

2.2.2.4 Road Safety Strategy (2013 – 2020)

The Road Safety Authority (RSA) *Road Safety Strategy (2013 – 2020)*, sets out targets to be achieved in terms of road safety in Ireland as well as policy to achieve these targets. The primary target of this strategy is defined as follows:

“A reduction of road collision fatalities on Irish roads to 25 per million population or less by 2020 is required to close the gap between Ireland and the safest countries. This means reducing deaths from 162 in 2012 to 124 or fewer by 2020. A provisional target for the reduction of serious injuries by 30% from 472 (2011) to 330 or fewer by 2020 or 61 per million population has also been set” (p. 1).



The document sets out strategies for engineering and infrastructure in terms of the benefits that they can have in reducing collisions. The provision of the proposed road development furthers this strategy in terms of improving the road infrastructure and achieving accident reduction along the existing road as described further in Chapter 5.

2.2.2.5 Smarter Travel: A Sustainable Transport Future (2009 – 2020)

Smarter Travel, A Sustainable Transport Future (2009 – 2020) presents an overall policy framework for sustainable transport in Ireland. The policy sets out a vision, goals and targets to be achieved, and outlines 49 actions that form the basis for achieving a more sustainable transport future. The relevant parts of this policy are set out in the following chapters:

Chapter 4: Actions to Encourage Smarter Travel

“The delivery of public transport, cycling and promotion of more sustainable travel patterns generally in many existing urban centres can only be achieved through retrofitting. We will require local authorities to prepare plans to retrofit areas towards creating sustainable neighbourhoods so that walking and cycling can be the best options for local trips, for example to reach local facilities such as shops and schools” (p. 34).



The proposed road development will indirectly support this action as it will result in the reduction of traffic through towns and villages along the N69 and N21. This will provide an opportunity for future improvements to pedestrian and cycle amenities to progress within these urban centres, whilst also providing greater reliability for road based public transport and bringing improvements to air quality for the communities within and around these centres.

Chapter 6: Actions to Improve the Efficiency of Motorised Transport

“[...] remove bottlenecks, ease congestion and pressure in towns and villages and provide the necessary infrastructural links to support the National Spatial Strategy¹” (p. 51).

The proposed road development aligns with this action through reduction of congestion and improved access within Adare and other towns and villages along the N69.

2.2.2.6 National Cycle Policy Framework (2009)

In support of the *Smarter Travel* policy, the *National Cycle Policy Framework* was also adopted by Government in 2009 and includes the following statements and commitments, as stated in the Executive Summary:

Vision / Reasons to Promote Cycling

“The mission is to promote a strong cycling culture in Ireland. The vision is that all cities, towns, villages and rural areas will be bicycle friendly. Cycling will be a normal way to get about, especially for short trips. Cycling contributes to improved quality of life and quality of the public realm, a stronger economy and business environment, and an enhanced environment. A culture of cycling will have developed in Ireland to the extent that 10% of all trips will be by bike by 2020”.

Interventions – Planning and Infrastructure (Chapter 2)

“Transportation infrastructure designs need to be cycle friendly”.

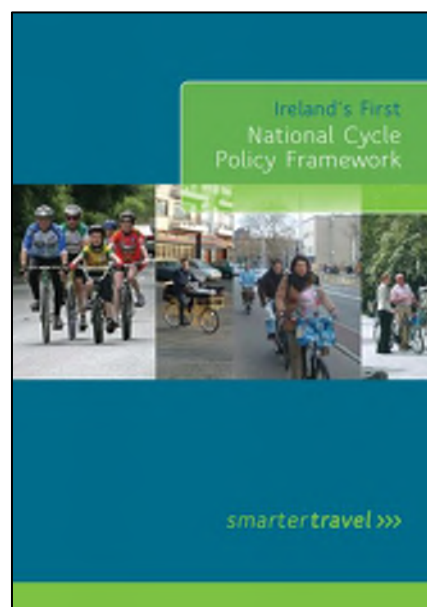
“The focus needs to be on [...] Reducing volumes of through traffic, especially HGVs, in city and town centres and especially in the vicinity of schools and colleges.”

“The other interventions include the following:

- *We will support the provision of dedicated signed rural cycling networks building on Fáilte Ireland’s strategy to develop Irish cycling tourism. This will cater for recreational cyclists as well as visitors”.*

The proposed road development will support the objectives of the *National Cycling Policy Framework* primarily through removal of large volumes of traffic, including most HGVs from the towns and villages along the N21 and N69 national routes between Limerick, Adare and Foynes.

As the proposed road development will consist of a motorway and a ‘Protected Road’ dual carriageway, these new roads cannot cater directly for cyclists. However, it has been designed so as to accommodate the *Great Southern Trail Greenway (GST)* walking and cycling route on the former railway line where crossed north of Rathkeale. Furthermore, as described in Chapter 4, there is potential for the adjoining rural local road network to cater for safe and comfortable cycling on alternative roads running generally parallel to the proposed new roads, which is a more suitable and appropriate



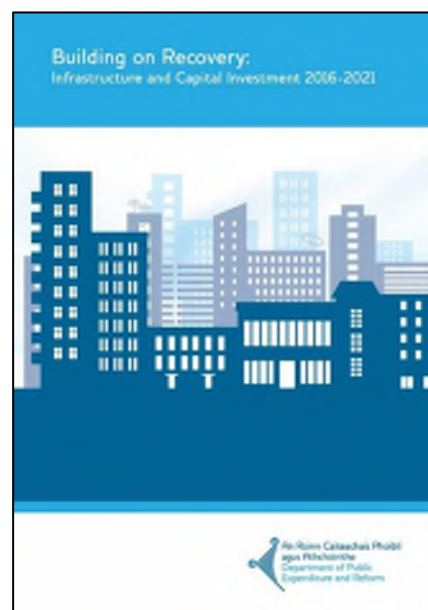
¹ Superseded by the NPF in 2018.

arrangement. Such signed cycle routes can be separately developed by Limerick City and County Council to cater for recreational and tourism cyclists across the central and west Limerick area.

2.2.2.7 Building on Recovery: Infrastructure and Capital Development (2016 – 2021)

Building on Recovery is a 6-year capital investment framework which aims to invest €27 billion in the key areas of transport, education, health and enterprise, with €10 billion targeted at transport elements of the plan. The plan was launched in September 2015 and recognises that high-quality infrastructure is an important element of a modern society and economy. It seeks to strengthen economic growth through enhancing efficiency, productivity and competitiveness, and underpinning social cohesion.

The plan provides €6 billion for investment in the roads network with a budget of €4.4 billion to ensure the existing extensive network throughout the country is maintained and strengthened. The remaining €1.6 billion is allocated to new projects including those targeted at removing bottlenecks, which included the N69 Shannon to Foynes Road and the Adare Bypass. The plan was reviewed in September 2017 and fed into the development of the NDP.



2.2.3 Regional Policy Context

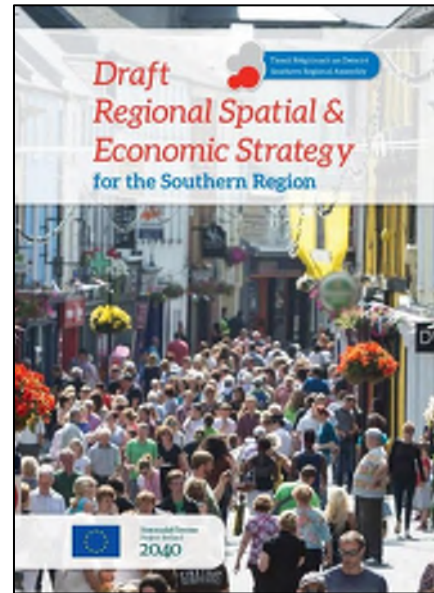
This Section outlines the regional and local policy documents of relevance to the proposed road development. They are as follows:

- Draft Regional Spatial & Economic Strategy for the Southern Region (2019–2031)
- Mid-West Regional Planning Guidelines (2010-2022)
- Mid-West Area Strategic Plan (MWASP) (2012 – 2030)
- Strategic Integrated Framework Plan for the Shannon Estuary (2013 – 2020)
- Shannon-Foynes Port Company Masterplan – Vision 2041 (2013)

2.2.3.1 Draft Regional Spatial and Economic Strategy – Southern Region

The planning policy hierarchy is illustrated in Plate 2.9, below.

The Regional Spatial and Economic Strategy (RSES), which is undergoing the final stages in the public consultation process in 2019, will set out a 12-year strategic development framework for the Southern Region. The Strategy’s aim is to support the National Planning Framework Ireland 2040 and sets out a development framework to guide development in the region.



The RSES is due to replace the Regional Planning Guidelines, once the final versions are developed by the Southern Regional Assembly. The objective of the RSES is to support the implementation of the emerging National Planning Framework – Ireland 2040 and the economic policies and objectives of the Government by providing a long-term planning and economic framework which is consistent with the NPF. The RSES will provide a long-term regional level strategic planning and economic framework for the Southern Region, and it is envisaged that they will build on the objectives outlined in the RPGs.

In May 2019, proposed material amendments to the Draft RSES were published by the Southern Regional Assembly. These proposed amendments have also been considered in respect of the proposed road development.

The Southern Region, as shown on the map below (Plate 2.10; NPF, p. 31), comprises 9 counties; Cork, Clare, Kerry, Limerick, Tipperary and Waterford in Munster and Carlow, Kilkenny and Wexford in Leinster.

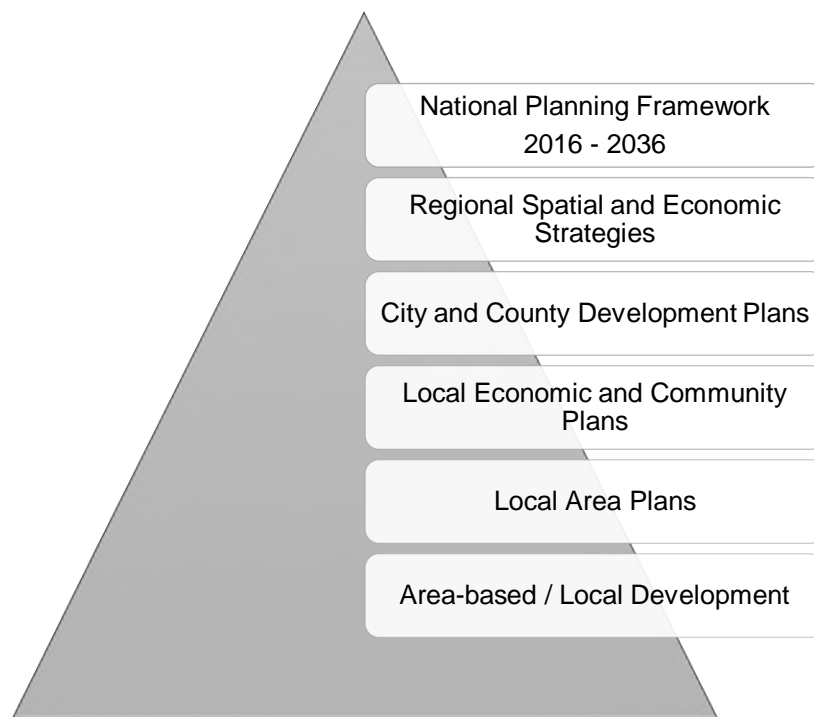


Plate 2.9 Irish planning policy hierarchy

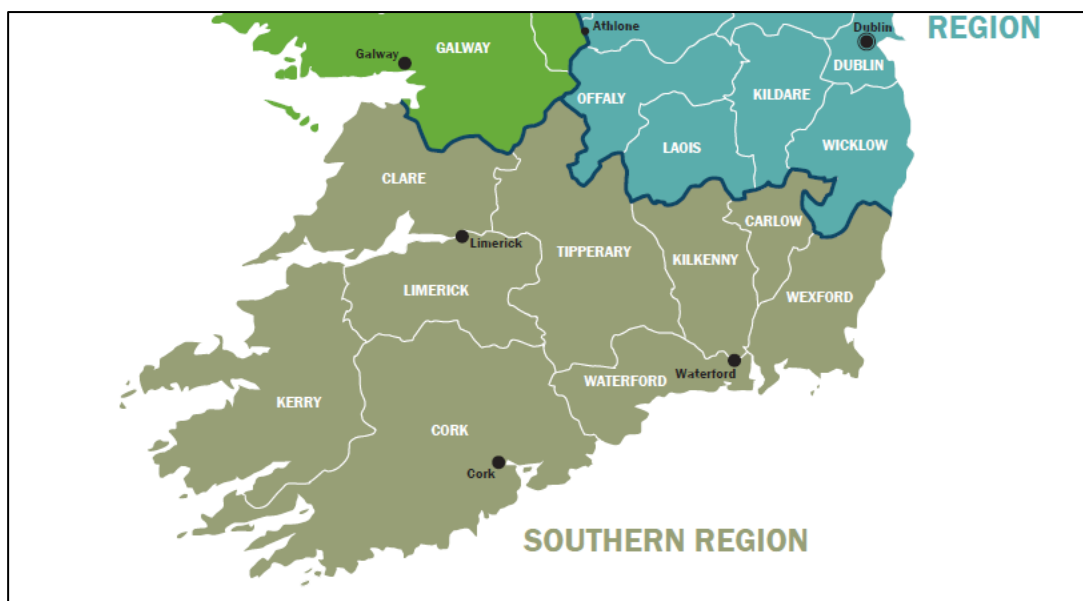


Plate 2.10 Map of Southern Region

The Southern Region contains one third of the State's population (1.58m) and is the second most populated Regional Assembly area. On final adoption the RSES will replace the Regional Planning Guidelines (RPGs), for the respective areas. The relevant Draft RSES objectives in relation to the Shannon Foynes Region and the Foynes to Limerick Road are addressed below.

The Region boasts a strong network of urban centres including the cities of Cork, Limerick and Waterford. A Metropolitan Area Strategic Plan (MASP) is outlined as part of the Draft RSES, which lists the investment in the Shannon-Foynes Port as a key to “realising the potential of the Limerick Shannon Metropolitan Area to attract and maintain economic activity and talent” (p. 36).

A number of Regional Policy Objectives, (RPOs), are included in the document which relate to ‘Our Region’s Strategic Port and Harbour Assets’. These include:

RPO 137: Ports

“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);*
- c) *Strengthen and develop the strategic regional economic role of other regional fishery harbours, ports and harbours”* (p. 146).

RPO 138: Ports and Airports

“The critical role of the Region’s port and airport assets will be protected by ensuring that local land-use policies facilitate and do not undermine their functions, and their landside access capacity, subject to consideration of environmental concerns including water quality, flood risks, human health, natural and built heritage” (p. 147).

RPO 139: Port Infrastructure

“Complement investment in port infrastructure by seeking the sustainable development of improved access infrastructure to ports from their regional catchments, including the promotion of rail access where practicable” (p. 147).

RPO 141: High-Quality International Connectivity - Ports

“To achieve NSO High Quality International Connectivity, the following port development actions are identified (subject to required appraisal, planning and environmental assessment processes and implementation of mitigation measures outlined in applicable SEAs and AAs) while ensuring the protection of sensitive natural environments and the protection of Natura sites, the protection of other harbour interests including recreation, tourism and residential amenity: [...]

- *Strengthening and maintaining access to ports through enhanced transport networks and improved journey times including support for M11 and N80 improved connectivity to Rosslare, N28 Cork to Ringaskiddy Road and N21/N69 Limerick to Adare to Foynes” (p. 147; proposed material amendment as of May 2019 underlined).*

Transport investment priorities are outlined for the Limerick-Shannon Metropolitan Area which will guide transport investment by the Government Departments, the National Transport Authority, (NTA), and other agencies. These investment priorities include:

- “d. *The maintenance and enhancement of the national roads network, catering for transport demand within the Limerick-Shannon Metropolitan Area, for improved inter-urban / interregional connectivity/ reduced journey times and for improved access to international gateways, including Shannon International Airport and Shannon-Foynes Port, through: [...]*
 - iv *Enhanced road connectivity to Shannon-Foynes Port, including local bypasses via Foynes to Limerick (including Adare Bypass) National Road Scheme. Maintenance of transport connectivity to Shannon International Airport” (p. 158).*

RPO 159, ‘National Road Projects’, lists a number of road projects to be delivered during the period up to 2027 to achieve NSO 2, ‘Enhanced Regional Accessibility’ of the NDP. The N21/N69 Limerick to Adare to Foynes route is listed under this RPO. Enhanced road connectivity to Shannon-Foynes Port, including local bypasses is also listed as a key future growth enabler to be supported by the MASP. The Limerick Shannon MASP also includes Policy Objective 12: Shannon-Foynes Port which supports the development of the Tier 1 Port and includes an objective to “*support the reinstatement of the Limerick to Foynes rail line and the delivery of the Foynes to Limerick Road Improvement Scheme” (p. 269).*

The RSES identifies that:

“the N69 does not meet the standards of reliability and connectivity required to serve a port; to support foreign and indigenous investment; nor to maximise the tourism potential of the West Limerick and wider region. In this regard the delivery of the Foynes to Limerick Road Improvement Scheme has been identified as a key infrastructural project as it would act as a catalyst in supporting the realisation of important potential wider economic development benefits. Connectivity to the motorway network will be critical to increasing the ports economic impacts in the future” (p. 269).

The proposed road development is fully aligned with the Draft RSES and is central to many of the planning objectives of that strategy, being specifically referenced in 5 specific RPOs.

2.2.3.2 Mid-West Regional Planning Guidelines (2010-2022)

The Mid-West Regional Planning Guidelines (RPGs) 2010-2022 provide a planning framework for the future physical, economic and social development of the Mid-West Region.

These current guidelines reflect other national social, economic and environmental policies which affect the Mid-West Region, as well as a range of existing regional strategies.

The following specific regional priorities in terms of roads have been included within the guidelines (p. 81):

- *“The N21 road link from Tralee via Newcastlewest to Limerick City to facilitate access to the City from that zone of the Region. In the event of funding for the provision of a motorway link between Tralee and Newcastlewest not being provided in the immediate future, by-passes will be required as a matter of immediate priority for Adare, Abbeyfeale and Newcastlewest;”* and
- *“The N69 road link between Askeaton and Adare to provide effective access to road freight traffic from Foynes to the N20/21 (linking Limerick with Cork and Tralee).”*



The guidelines also recognise that the following roads should be regarded as regional priorities, considered crucial for the Region’s long-term integration (p. 82):

- *“The condition and standard of the N69 between Foynes and Limerick City to provide efficient access to the ports; and;*
- *Upgraded road links along the Shannon Estuary in order to facilitate employment and tourism development.”*

The four priorities listed above outline the need for the Foynes to Limerick Road (including Adare Bypass) as a regional priority for the Mid-West, outlining the benefits it will have in linking the zones within the region in the long-term, facilitating access to Limerick City as a Gateway, and access to the N20/N21 from Shannon-Foynes Port.

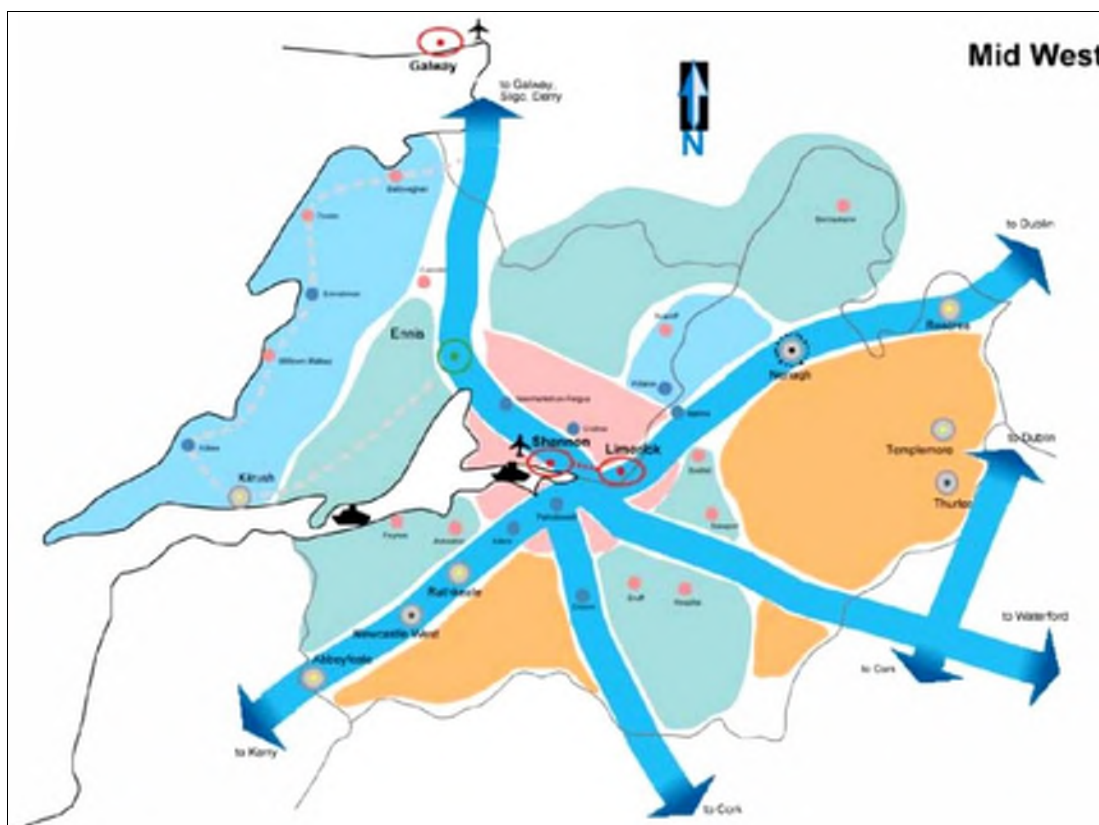


Plate 2.11 Mid-West Region (Source: MWRPGs 2010-2022)

2.2.3.3 Mid-West Area Strategic Plan (MWASP) (2012 – 2030)

The Mid-West Area Strategic Plan (MWASP) is a strategic planning, land use and transportation strategy for the Mid-West region and includes the County Councils of Limerick, (then) North Tipperary and Clare along with Limerick City Council. MWASP is a comprehensive, integrated plan for land use planning and transportation in the Mid-West Region over an 18-year period. The MWASP sets out a series of economic, land-use and transport recommendations including a proposed transportation investment programme, a public transport feasibility report, spatial and economic strategies and recommendations to achieve balanced regional development and an enhanced quality of life for the citizens of the Mid-West region. Adare is recognised as one of the regions key tourist strengths and attraction for tourism in the region.



The Principal Priorities of the Strategy include:

- To take a cohesive approach improving infrastructure in terms of transport, business parks and broadband;

A stated strategy objective of the MWASP is to

“... construct the Adare Bypass, improve the Foynes Port Link...” (p. 70).

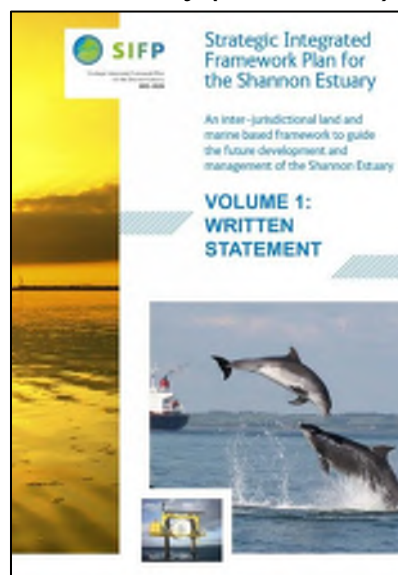
In Section 5.4.4 of the MWASP, dealing with strategic road infrastructure, there is a set of recommendations as shown in Table 2.1.

Table 2.1 National Road Recommendations as set out in the MWASP (p. 77)

3.	<i>M21</i>	<i>Review the corridor improvements and connection to Newcastle West, giving consideration to N69 connection (refer to point 9 below)</i>
9.	<i>N69</i>	<i>Primary access route to Shannon-Foynes Port requires complete upgrade and consideration of connection with M21 (refer to point 3 above)</i>
13.	<i>N69</i>	<i>Upgrade the road access to Foynes Port to motorway standard</i>

2.2.3.4 Strategic Integrated Framework Plan for the Shannon Estuary (2013 – 2020)

The Strategic Integrated Framework Plan (SIFP) sets out an overall strategy for the proper sustainable growth, development and environmental management of the Shannon Estuary Region for the next 30 years. The plan was commissioned by Clare County Council, Kerry County Council, the then Limerick City and County Councils, Shannon Development and Shannon-Foynes Port Company. Plate 2.12 shows the key links identified within the SIFP.



The Plan identifies the value of the Shannon Estuary as a key national strategic transport corridor and a natural deep-water resource which routinely hosts the largest vessels entering Irish waters. Its facilities serve the local regional and national economy, as well as providing the necessary maritime and ancillary resources to facilitate value-added activities serving national, European and global markets. In terms of transportation infrastructure which serves the region, the plan recognises the importance of quality transport corridors for port activity and the economic growth of the Estuary and notes in particular the following:

“The N69 is a particularly important route and is highlighted as being a strategic transport corridor providing key connections and linkages between key settlements, the Port of Foynes, the Gateway of Limerick / Shannon and the wider region. The NRA has instructed Limerick City and County Council to progress the Foynes to Limerick Major Road Improvement Scheme. Limerick City and County Council has therefore recently announced a major upgrade scheme for the N69 connecting the Port of Foynes with the M7/N18 at Limerick. The proposal for a high-quality road aims to provide improved access to the Port and supports the envisaged expansion of its capacity and usage outlined in the National Ports Policy 2013” (p. 19).

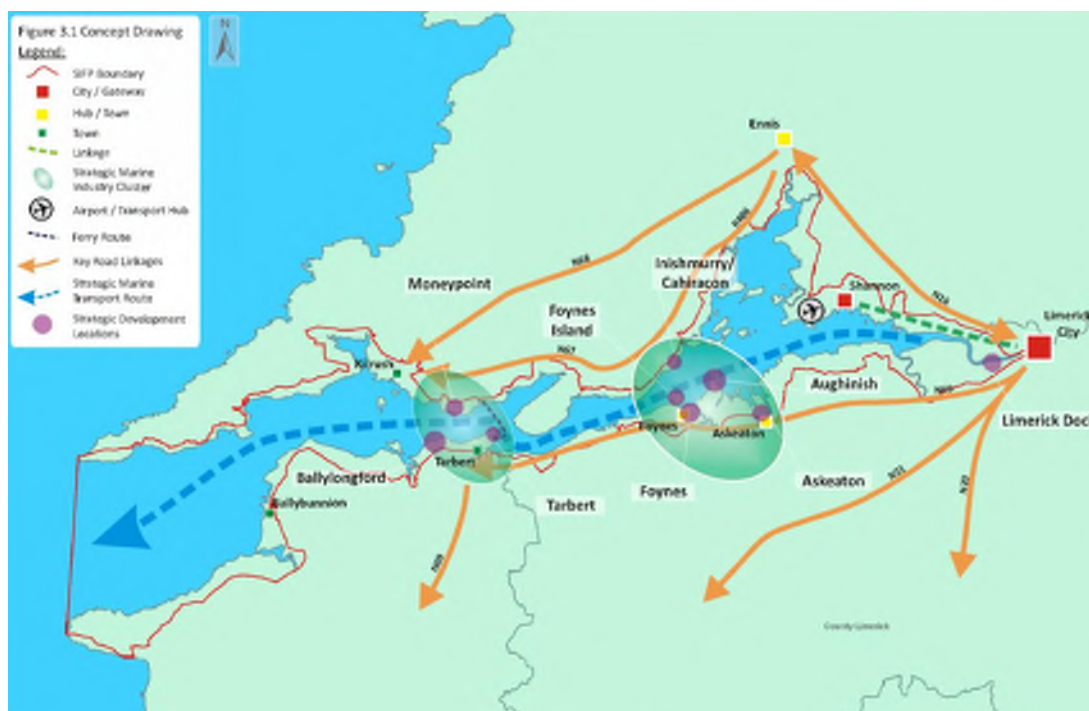


Plate 2.12 Strategic Integrated Framework Plan (SIFP) Concept

2.2.3.5 Shannon-Foynes Port Company Masterplan – Vision 2041 (2013)

Vision 2041, Shannon-Foynes Port Company's Masterplan, published in February 2013, sets out the strategy for development of the Shannon Estuary ports, with Shannon-Foynes port as one of the key drivers for further development and expansion.

Shannon-Foynes Port Company's facilities are of national importance and this is reflected in the fact that 37% (CSO 2011) of Ireland's bulk traffic now transits the Estuary, making Shannon-Foynes Port Company's the largest bulk port in the country and the second largest port based on overall tonnage after Dublin Port.

Shannon-Foynes Port Company handles the largest vessels entering Irish waters and some 10 million tonnes of cargo passed through its six port facilities on the Shannon Estuary in 2011. Of this cargo, 1 million tonnes passed through Shannon-Foynes Port onto road transport in 2011. The growth projections for Shannon-Foynes Port made in 2013 have since been considerably exceeded with close to 2 million tonnes of cargo transferred to road transport at Foynes in 2018. Thus, the HGV traffic at Shannon-Foynes Port doubled in the 7-year period 2011 to 2018.



The Shannon-Foynes Port Company's ambition to provide a new deep-water berth (circa 15m draught) at Foynes and the continued expansion of existing infrastructure at Foynes in order to capitalise on the trend toward larger vessels will all lead to increases in traffic at the port. The Masterplan makes specific references to land

transportation infrastructure needs in relation to their areas of activity and the potential for the expansion of Shannon-Foynes Port.

Chapter 8 of the Masterplan, Transport and Connectivity, discusses the deficiencies of the existing road network while it is outlined in the Strategy Overview that:

“It has been a long-term objective of SFPC to support the development of a new link road between the N69 and the N21, which would provide for a high-quality link between the routes. The deferral of key projects such as the Adare bypass, N21 upgrade and the Atlantic Corridor, has resulted in a deterioration of traffic conditions on the N21 at the same time as improvements along the N69” (Executive Summary; p. iv).

The Masterplan also indicates in its findings that the existing N69 will experience capacity shortfalls even without considering the forecast of additional port related traffic. Therefore, it is outlined that *“a long-term objective of new or improved linkage between the N69 and N21 should be retained and pursued”* (p. 82).

Vision 2041 indicated in medium growth scenarios for the port that cargo volumes were expected to reach 3.3 million tonnes by 2025 and 4.1 million tonnes by 2041. The corresponding HGV movements in and out of the port were expected to increase from 2011 figures of approximately 530 vehicles per day to between 1,025 and 1,870 per day by 2041 using base line growth and high line growth scenarios respectively. This equates to HGV traffic growth of between 93% and 252%.

An update on port freight growth projections based on recent strong growth between 2011 and 2018 has led the Shannon-Foynes Port Company to increase the previous projections from 3.3 million tonnes to 3.8 million tonnes by 2025, and from 4.1 million tonnes to 5.6 million tonnes by 2041, which is nearly 40% higher than previously projected. Further details are provided in Chapter 5 of this EIAR in relation to Traffic.

Provision of improved road access to Shannon-Foynes Port will provide a key support for the growth of the port and associated industries. The Tier 1 Port status of Foynes indicates the national and regional importance of the port as a major factor in the economic life of the Mid-West Region and the national economy. Growth of the port is currently constrained by the poor-quality road access that discourages industrial and commercial development relative to the opportunities associated with the port.

In 2018 the Shannon-Foynes Port Company applied for planning approval under Strategic Infrastructure Development Act for significant expansion of the port facilities, which will cater for the ongoing growth of the port and increasing cargo volumes. Planning approval was confirmed by An Bord Pleanála in January 2019. Chapter 17 of this EIAR considers the potential cumulative impacts and interactions between the proposed road development and the separate proposals for the expansion of Shannon-Foynes Port.

While this future growth of the Shannon-Foynes Port will result in the increase in Port traffic and HGVs along the surrounding road infrastructure, it is noted that this increase in road traffic will not occur as a result of the proposed Foynes to Limerick Road. One of the main objectives of the proposed road development is to provide a safe and high-quality connection for this projected traffic (which will occur irrespective of the proposed road development) to the Core Network, with the least environmental impact. Improved road access to the port is required to complement the growing port capacity.

2.2.4 Local Policy Context

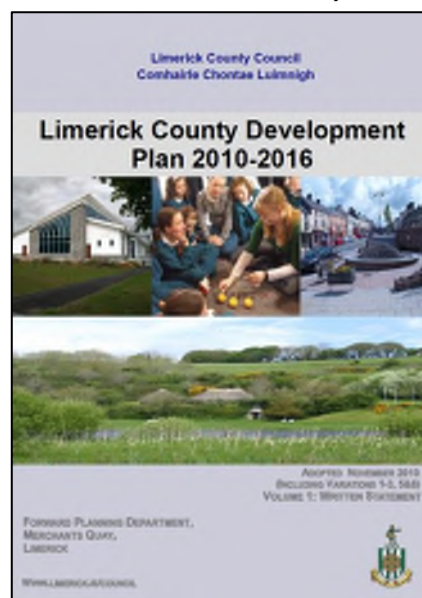
This Section outlines the local policy documents which have influenced the design of the proposed road development. They are as follows:

- Limerick County Development Plan (2010 – 2016; as extended to 2020)
- Kerry County Development Plan 2015-2021
- Adare Local Area Plan 2015-2021

2.2.4.1 Limerick County Development Plan (2010 – 2016; as extended to 2020)

The Limerick County Development Plan 2010 – 2016 (As Extended) includes transport and development objectives to ensure that the transportation, infrastructure, natural and energy resources will be developed in a sustainable and efficient manner to promote the social and economic wellbeing of the county and its population.

Following the amalgamation of Limerick City Council and Limerick County Council to form Limerick City and County Council in 2014, it was confirmed that the County and City Development Plans would not be reviewed in 2015 and they will stay in force until a new joint plan is prepared, thereby extending the life of the Plans beyond 2016 to 2020.



The Development Plan recognises the importance of linkages throughout the county and beyond as key features in achieving balanced regional development objectives. Variation No. 6 to the Plan was adopted in April 2018 and sees policy support for the Foynes to Limerick Road adopted as part of the current Plan and included provisions for the proposed road development in specific objectives as described below.

Across the road networks of the County it is noted that the increase in traffic has led to pressure on the condition and capacity of the road network in many areas.

The implementation of national and EU regulations in respect of transport policies is supported in the provisions set out in Table 2.2.

Table 2.2 Provisions for Implementation of Transport Policies of the Limerick County Development Plan 2010 – 2016 (p. 2/13)

Policy CP 01:	<i>To implement relevant European, national and regional regulations, guidelines and strategies at County level.</i>
Policy CP 03:	<i>To provide for an enhanced quality of life for all, based on high quality, sustainable residential, working and recreational environments and transportation networks.</i>
Policy CP 07:	<i>To facilitate the provision of the County's infrastructure in a sustainable and efficient manner that promotes the social, economic and physical development of the County and the people living therein.</i>

In terms of transport infrastructure, the following provisions have been identified in the County Development Plan (Table 2.3) which support the proposed road development.

Table 2.3 Provisions for Development of Transport Infrastructure of the Limerick County Development Plan 2010 – 2016 (p. 8/18 – 8/19)

N21 Tralee Road (and Killarney Road)	<i>Design, reserve land for and commence construction of a bypass of Adare and N21 Route Improvements from Adare to the County boundary, as resources become available, having regard to the requirements of the Habitats, Water Framework, Floods, and EIA Directives and in accordance with the mitigation measures identified in the Appropriate Assessment, Strategic Flood Risk Assessment and Strategic Environmental Assessment of Variation No. 6 at project level.</i>
N21 to N69	<i>Design, reserve land for and commence construction of a new road between the N21 at Rathkeale and the N69 at Foynes as resources become available, having regard to the requirements of the Habitats, Water Framework, Floods, and EIA Directives and in accordance with the mitigation measures identified in the Appropriate Assessment, Strategic Flood Risk Assessment and Strategic Environmental Assessment of Variation No. 6 at project level.</i>
N69 Tarbert (Foynes) Road	<i>Design, reserve land for and commence construction of N69 Route Improvements from Limerick to Glin as resources become available.</i>

In support of the Foynes to Limerick Road and transport facilities generally, the County Development Plan includes the following policy and objectives (Table 2.4).

Table 2.4 Provisions in Support of the Proposed Road Development of the Limerick County Development Plan 2010 - 2016

Objective IN O13: Reservation of corridors for major road improvements:	<i>It is an objective of the Council to support major improvements by reserving such corridors of any such proposed routes free of developments that would interfere with such improvements (p. 8/13).</i>
Objective IN O22: Promotion of improvements to the N69 Limerick to Foynes	<i>It is the objective of the Council to promote the strategic improvement of the N69 between Limerick City and Foynes to facilitate traffic by heavy goods vehicles into this important port from an easterly direction (p. 8/18).</i>
Objective IN O24 Enhancing Connectivity with the Estuary	<i>It is an objective of the Council, as resources become available and in consultation with TII, to design, reserve land for and commence construction of a new road from the N69 and the strategically important port of Foynes to the national primary road network and Limerick Gateway to provide for improved vehicular connectivity, having regard to the requirements of the Habitats, Water Framework, Floods, and EIA Directives and in accordance with the mitigation measures identified in the Appropriate Assessment, Strategic Flood Risk Assessment and Strategic Environmental Assessment of Variation No. 6 at project level (p. 8/19).</i>

2.2.4.2 Kerry County Development Plan 2015-2021

Although Kerry is not within the Study area for the proposed Foynes to Limerick Road development, the N21 currently provides connectivity from the hubs of Tralee and Killarney, to the gateway town of Limerick and onward to Dublin and Galway.

Kerry County Council recognises its role in providing or facilitating the sustainable provision of physical infrastructure essential to support the existing and future population of the County and economic growth and in particular by improving links

between the Linked Hub Towns of Tralee and Killarney and to the Gateways in the Region (Cork and Limerick).

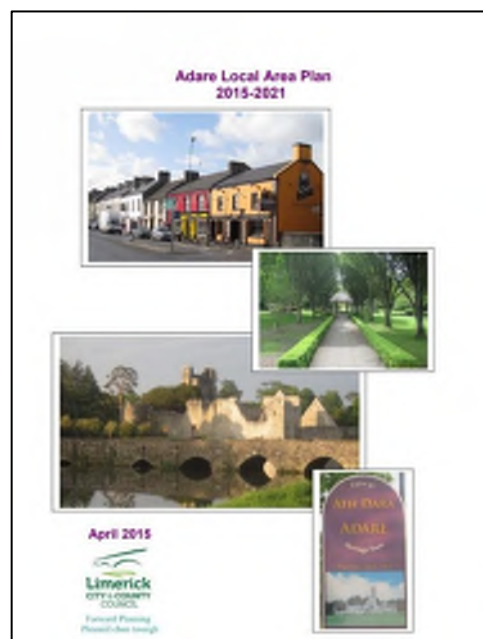
North Kerry's location on the Shannon Estuary is also noted as it presents opportunities for future sustainable economic development and employment growth. Kerry County Council contributed to the commissioning of the Shannon Integrated Framework Plan for the Shannon Estuary (2013-2020), as described earlier, which promotes the development of the Shannon Estuary and outlines the importance of quality transport corridors for port activity and the growth of the Estuary.

2.2.4.3 Adare Local Area Plan 2015-2021

The Adare Local Area Plan (LAP) states that:

"It is the long-term vision of the Council that Adare functions efficiently as a place where people can and want to live, work, and visit, and which fosters an authentic sense of place." (p. 21).

To achieve this vision the LAP outlines that Adare must develop in a manner that protects its rich cultural and natural heritage, accommodates a vibrant and balanced community, and provides good employment opportunities and quality local services and amenities. Good transport links are important, including improvements to public transport services to provide a genuine alternative to the car. Building on the existing strengths of the settlement it is imperative that all stakeholders maximise any development opportunities in the village to secure progression and improved quality of life.



SWOT analysis (strengths, weaknesses, opportunities and threats) was carried out throughout the plan preparation process and pre-draft stage. The SWOT analysis found the following in relation to the development of the town:

Weaknesses: High traffic volumes through the village centre; Lack of permeability throughout the village;

Threats: Worsening traffic congestion;

Opportunities: A Bypass would improve the town centre environment.

In relation to transport, the LAP states that there are:

"issues relating to the effectiveness and uses of the existing transport infrastructure in the village. The N21 Limerick to Killarney road passes through the centre of Adare causing serious traffic congestion issues throughout the year, but particularly in the summer months with tourist traffic to and from the southwest. The village is served by a limited capacity road network with many roads meeting in the village centre contributing to congestion problems. Also because of on-street parking on both sides of Main Street, trucks have particular difficulty passing each other. There are also very serious capacity issues at the junction of Station Road and Main Street. Therefore, the need for a complete bypass for the village is a priority" (p. 40).

This is supported by the following objective:

“Objective T1: Adare Bypass It is an objective of the Council to provide a bypass for Adare to relieve traffic congestion in the village for the convenience and safety of road users” (p. 41).

It is noted in the LAP that the Foynes to Limerick Road will provide a high-quality road connection between the port of Foynes and Limerick.

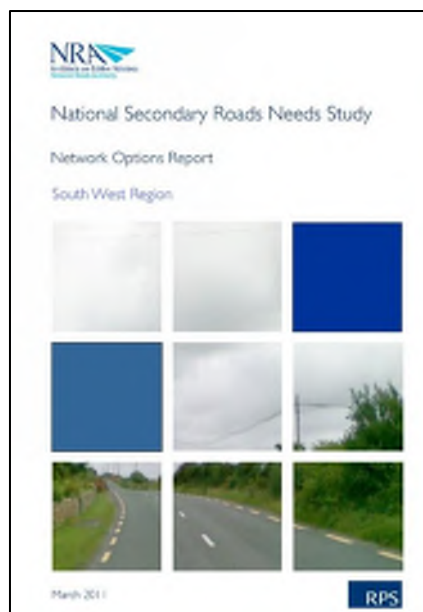
2.3 Associated Studies

2.3.1 The National Secondary Road Needs Study (2011)

The National Secondary Roads Needs Study (NSRNS) published in 2011 by TII recognised the importance of National Secondary Roads (NSRs) in terms of their role in connecting towns to each other and to the National Primary Roads network. The study accepts that, in investment terms, the NSRs have suffered relative neglect and that improvements are required.

The study identifies the deficiencies within individual lengths of National Secondary Roads and provides a range of proposals for dealing with these deficiencies. Based on traffic volumes at the time, the N69 between Foynes and Limerick was identified as requiring improvements along most of its length with specific upgrades recommended as follows:

- Mungret to west of Kilcornan (with bypasses of Clarina, New Kildimo & Kilcornan); upgrade to Type 1 Single Carriageway;
- Kilcornan to Askeaton Bypass: upgrade to Type 2 Single Carriageway; and
- Askeaton Bypass to Foynes, upgrade to Type 2 Single Carriageway.



The deficiencies of the existing N69 route identified in the NSRNS give support to the need for the proposed road development. These proposed upgrades predate the adoption of the EU TEN-T Regulations and it should be noted that the road improvements envisaged in the NSRNS would not meet the requirements of the TEN-T Regulations or cater for the projected increase in traffic from the Shannon-Foynes Port Company.

2.4 Existing Road Network

The existing conditions of the roads in the study area are assessed in this section in terms of suitability for the key policy objectives and requirements as described in the previous sections of this chapter. The following three National Roads have been considered in this assessment (Plate 2.13).

1. M20 National Primary Route: Attyflin to Rossbrien (M7 / N18 / M20 junction)
2. N21 National Primary Route: Rathkeale to Attyflin (M20 / N20 / N21 junction)
3. N69 National Secondary Route: Foynes to Limerick City



Plate 2.13 Existing National Routes in the Study Area

2.4.1 M20 National Primary Route

The M20 is a dual carriageway Motorway which extends from the M7 Junction 30 at Rossbrien on the Limerick Southern Ring Road to the N20 / N21 junction at Attyflin, southwest of Patrickswell, over 10km in length, as indicated in Plate 2.14, below.

The M20 motorway is a 2-lane Dual Carriageway with hard shoulders. The alignment is of a very high quality for a design speed of 120 km/h. This existing section of road fully meets the requirements of the TEN-T Core and Comprehensive Networks.



Plate 2.14 M20 from Rossbrien to Attyflin Junctions



Plate 2.15 M20 between Junction 3 Raheen and Junction 4 Patrickswell (Source: Google Street View)

2.4.2 N21 National Primary Route

The N21 extends from the M20 / N20 / N21 junction at Attyflin to Rathkeale (Plate 2.16) and passes through the villages of Adare and Croagh, over a distance of 17.5km.

The N21 road type and width varies very considerably in distinct sections as follows:

- Attyflin to Monearla: Dual Carriageway similar to the M20 over 1.5km length;
- Monearla to Clonunion / Rineroe: Wide Single Carriageway road, 10m wide, with 3m hard shoulders over 2km length;
- Through Adare village and approaches: narrow Single Carriageway, 7m wide and without hard shoulders over 5 km length; and
- West of Adare to Rathkeale: Single Carriageway, 7.3m wide with 3m hard shoulders and 3m verges over 9 km length.

2km west of Adare, the N21 is a good quality Single Carriageway road, constructed in 1994 to bypass both Croagh and Rathkeale (Plate 2.22). Through the village of Croagh, over a length of 0.8 km, traffic calming measures were implemented in 2013 including traffic islands, public lighting and a 60km/h speed limit as seen in Plate 2.24, below.



Plate 2.16 N21 Rathkeale to the M20/N20 junction



Plate 2.17 N21 Dual Carriageway Terminal – Change in Cross-Section (Source: Google Street View)



Plate 2.18 N21 between Monearla and Clonunion/Rineroe – Wide Single Carriageway (Source: Google Street View)



Plate 2.19 N21 east of Adare at Adare Manor Golf Course



Plate 2.20 N21 through Adare Village with congestion in the westbound direction



Plate 2.21 N21 through Adare Village



Plate 2.22 N21 on western side of Adare (Source: Google Street View)



Plate 2.23 N21 Rathkeale Bypass



Plate 2.24 N21 through the village of Croagh

N21 Junctions and Accesses

Between Rathkeale and Attyflin, there are a total number of 181 junctions and accesses, as follows:

- Public Road Junctions: 29;
- House and Farm Accesses: 74;
- Field Accesses: 51; and
- Business / Community Accesses: 27.

Within Adare village, there is significant on-street parking, several pedestrian crossings, a mini-roundabout junction at Station Road and a junction for Blackabbey Road, together which restrict and slow traffic flow through the village as described in Chapter 5 Traffic Analysis.

Summary for the Existing N21 Route

Two thirds of the N21 route between Attyflin and Rathkeale is a good quality road that meets some of the TEN-T requirements in terms of alignment, but does not do so in terms of the many minor junctions and accesses, which interfere with smooth traffic flow and generate collision risks. The remaining third of the route passes through the villages of Adare and Croagh, which would need to be bypassed with a new road to meet the TEN-T requirements.

2.4.3 Existing N69 National Secondary Route

The existing N69 NSR is a Single Carriageway that extends from Limerick City at the eastern end through to Tralee at the western end. The N69 passes through or bypasses the towns and villages of Listowel, Tarbert, Glin, Loghill, Foynes, Askeaton, Kilcornan, Kildimo, Clarina and Mungret before entering Limerick City. This section of the existing N69 from Foynes to the N18 Dock Road Junction at the edge of Limerick City is 32km long, as shown in Plate 2.25, below.



Plate 2.25 N69 Foynes to Limerick

The N69 between Foynes and the N18 junction is a Single Carriageway with varying cross-sectional width typically between 7.5 and 8.5m. There is little or no hard shoulder along the majority of this route other than at sections which have been subject to improvements, such as the Askeaton Bypass. Within the villages along the route, the road cross-section is of an urban nature with raised footpaths, some parking provision and speed restrictions. In some places, the road is extremely narrow. Plate 2.26 shows the humpback Ferry Bridge, which crosses the River Maigue where the road is less than 7m wide and has no footpath.

The following photographs show the varying conditions along the existing N69. Overtaking opportunities are generally very restricted along the N69, largely due to the bendy nature of the road. On some of the few straight horizontal sections, there are vertical crest curves where the forward visibility is less than the minimum design standard for overtaking. This is evident in the road markings with extensive continuous centrelines to restrict overtaking. The horizontal alignment of this section of the N69 contains many tight radius curves that are below standard for a 100km/h design speed with radii between 125 and 255m. Plate 2.30 shows the tight radii and restricted overtaking at Ballyengland to the east of Askeaton.



Plate 2.26 N69 at Ferrybridge



Plate 2.27 N69 west of Mungret



Plate 2.28 N69 at eastern end of Kildimo



Plate 2.29 N69 west of Kildimo: Recent minor improvement scheme



Plate 2.30 Bandy N69 at Ballyengland (Source: Google Street View)

N69 Junctions and Accesses

There are a very large number of junctions and accesses along this section of the N69 as follows:

- Public Road Junctions: 63;
- House and Farm Accesses: 236;
- Field Accesses: 151; and
- Business / Community Accesses: 43.

The total number of 493 accesses stated above includes all accesses in the various villages and towns along this section of the route. There are approx. 11 junctions / accesses per kilometre (excluding field accesses). Nine or more junctions / accesses per kilometre is considered as 'High' under design standard *DN-GEO-03031 Rural Road Link Design* (TII, 2017). These accesses result in reduced traffic safety with potential traffic hazards and decreased traffic capacity. Generally, there is poor visibility from the junctions due to the narrow verges and the restricted alignment.

The N69 passes through the villages of Kildimo, Clarina and Mungret as shown in the following photographs.

Summary for the Existing N69 Route

In terms of the existing bendy road alignment, narrow cross-section and high number of junctions and accesses, the N69 falls very far short of the TEN-T Core Network requirements for access to Shannon-Foynes Port.



Plate 2.31 N69 in the village of Kildimo



Plate 2.32 Traffic Signal on N69 in the village of Clarina



Plate 2.33 N69 in the village of Mungret

2.5 Need for the Proposed Road Development

The primary need for the proposed road development stems from the European Policy to provide TEN-T Core Network standard road infrastructure to the Shannon-Foynes Tier 1 Port, and TEN-T Comprehensive Network standard road infrastructure on the Limerick to Kerry route, in accordance with the TEN-T Regulations.

The key relevant National Policy objectives are:

1. To support the Tier 1 status of Shannon-Foynes Port and provide efficient and effective transport links to the national road network at Limerick; and
2. To improve the route between Limerick and towns in the Southwestern Region through the bypass of Adare.

Regional policies have outlined the following key objectives for the proposed road development:

1. To help realise the potential of the Limerick Shannon Metropolitan Area;

2. To support the economic growth of the Shannon Estuary and its resources; and
3. To facilitate a road link between Tralee and Limerick City including a bypass for Adare.

Local policy documents including development plans outline the following needs for the proposed road development:

1. To provide key transportation links to achieve balanced regional development;
2. To improve the quality of life of those in towns affected by congestion, and improve local journey times; and
3. To enhance amenities and heritage within attractive places such as Adare which is currently affected by congestion.

The existing national roads do not achieve the above objectives for the following reasons:

1. The existing N69 road linking Limerick to Shannon-Foynes Port has a poor road alignment, restricted width and a very high number of minor junctions and frontage accesses, such that it does not comply with the TEN-T Core Network requirements; and
2. The existing N21 road suffers severe congestion in Adare and has a restricted speed limit at Croagh, which means that this route does not meet TEN-T Comprehensive Network requirements, nor the objectives at National, Regional and Local levels.

2.6 Objectives of the Proposed Road Development

2.6.1 Primary Project Objectives

The primary objectives of the Foynes to Limerick Road (including Adare Bypass) are to provide high-quality road connectivity by extending the TEN-T Core road network from Limerick to Shannon-Foynes Port, in conjunction with improvement of the N21 route between Adare and Rathkeale by means of a bypass of Adare, as part of the TEN-T Comprehensive road network, both to a standard that fulfils the requirements of the EU TEN-T Regulations.

The framing of the specific objectives of the proposed road development has been undertaken in accordance with the 5 criteria included in the Common Appraisal Framework of the TII *Project Appraisal Guidelines for National Roads Unit 3.0 – Project Brief* (2016):

1. Economy;
2. Safety;
3. Environment;
4. Accessibility & Social Inclusion; and
5. Integration.

2.6.2 Economic Objectives

From an economic perspective, the key objectives of this proposed road development are:

- To reduce journey times and improve journey time reliability on the two TEN-T road network routes west of Limerick; and

- To support the economic performance of the wider region through the provision of improved transport infrastructure which will reduce the cost of travel for business and tourism and assist in reducing the overall cost of production thereby improving competitiveness.

2.6.3 Safety Objective

The proposed road development is to provide safer road connections along the routes from Limerick to Kerry and Shannon-Foynes Port.

2.6.4 Environmental Objectives

The proposed road development is to provide improved road connections from Limerick to Shannon-Foynes Port and Kerry without significant impact on population and human health, biodiversity (including protected sites), cultural heritage, landscape, material assets or any other aspect of the environment.

2.6.5 Accessibility & Social Inclusion Objectives

The key objectives of the proposed road development in terms of accessibility and social inclusion are:

- To improve accessibility to key facilities, such as employment, education and healthcare;
- To reduce travel costs in the region and thereby encourage and support investment and employment in the wider region;
- To support the accessibility and social inclusion objectives of national, regional and local planning policy; and
- To reduce levels of severance along the existing N21 and N69, particularly through the various towns and villages.

2.6.6 Integration Objectives

The following objectives are outlined for integration:

- To meet the requirements of the EU Regulations relating to the TEN-T Network which will improve the integration of Ireland with the rest of the European Union; and
- To support the integration objectives set out in National, Regional and Local Planning policy.