



**Shannon  
Chamber**  
Advancing business together



# N19 SHANNON AIRPORT ACCESS ROAD IMPROVEMENT SCHEME

**Response to Phase 3  
Environmental Impact Assessment Scoping Report**

**December 2022**

# Response to Chapter 1 - Section 1.4.4 (Page 10)

- Shannon Chamber notes, in Section 1.4.4 (page 10), a statement referring to the fact that The Project Team is preparing responses to the feedback received from specific organisations including Shannon Chamber.

**Shannon Chamber requests a copy of this response and confirmation on when this will be issued.**

# Response to Chapter 2: Section 2.5: References to Existing Planning Documents but NOT the Shannon Town Centre Masterplan and Rail Reservation

**Section 2.5** reviews various spatial planning and policy documents relevant to the N19 e.g. National Planning Framework, LSMATS, Clare County Development Plan and Shannon Town and Environs Plan. However, there is **no reference** to the recently approved Shannon Town Centre Masterplan. **This should be reviewed, added to section 2.5 and also included in the Policy Conclusions (Section 2.6).**

Reference to the Shannon Town Masterplan is more than a matter of adding a document to a list of references. In our Submission, dated 2 December 2020, we expressed the view that the solution to the N19 road improvement must be delivered by thinking not just of the road but of the opportunity to connect and reinforce Shannon's three key components (Airport, Industrial Zone, Living Town) and its linkage with and influence on the wider region and corridor.

We also suggested that the analysis of options should take account of the land and planning reservation that has been made in the County Development Plan for a rail link to Shannon, given that the planning reservation follows the route of the N19. The concept of developing a North/South Limerick to Ennis/Shannon Airport Suburban Network, as referenced by Irish Rail in its submission to the pre-draft consultation to the preparation of a new County Development Plan 2022 – 2028, and shared with Shannon Chamber, would suggest that any changes that might impact on such a potential rail link be taken into consideration.

We are still unclear on the impact of the selected option on the planning reservation that is in place for the rail line/spur to Shannon in the existing development plans. This point was included in previous submissions but does not seem to be addressed in subsequent documentation and proposals. In contrast, the rail line reservation is included in the Shannon Town Centre Masterplan.

# Response to Chapter 4: Section 4.1.2: Design Proposals including Recognition of Points made in Previous Shannon Chamber Submissions.

**Section 4.1.2** includes references to Shannon Group’s Masterplan for the area: “Shannon Airport Group has extensive future development plans laid out in their masterplan to be delivered in three phases – phase 1 is complete, phase 2 is in development and phase 3, which covers this section of road and consists mainly of redevelopment of the existing extensive disused carpark.”

Given that the carpark referenced in this paragraph is the former oil company location opposite the Westair Hangar, Shannon Chamber’s recommendation is that this site offers potential for development and should be linked to recent reinforcement of the river embankments and combined with the addition of pedestrian walkways on the top of the embankments.

This opportunity has been highlighted by a range of stakeholders over an extensive period of time, including Shannon Chamber’s initial (December 2020) submission on the N19 upgrade project . These proposals should be taken into account by the EIAR and the final design solution should reinforce, rather than limit, the potential to use the existing pathways and the river embankments to create a combined pedestrian and cycleway next to the N19. Doing so will realise the opportunity to start a greenway from the airport doors, making the River more accessible and visible to those arriving/departing Shannon Airport..

**Figure 4.1** shows indicative cross sections (A and B) for the preferred route. Indicative cross section A, from the Emerald VIP (former SRS) Hangar to the Westair Hangar, suggests that the existing footpath is to be eliminated. Shannon Chamber’s December 2021 submission argued that as this already exists it should be possible to retain the pathway and increase rather than reduce pedestrian options. It was also suggested that if extra width is required to facilitate the bus lane that the footpath could be realigned closer to the security fence. This side of the road is regularly used by pedestrians. There is a strong argument for retention of the footpath on this side of the road to complement the new cycle/pedestrian pathway on the opposite side.

There appears to be a **discrepancy between Figure 4.1 and the road layouts for sheets or keyplans 0001 to 0006 in Appendix 1**. Sheets 1 to 6 show that the existing pathway is retained between Knockbeagh and Drumgeely. This is welcome and in line with the arguments made for retention rather than elimination of existing pathways in Shannon Chamber’s December 2021 submission.

Shannon Chamber had argued, in its December 2021 submission, for retention of the existing pedestrian crossing and bus stop opposite the Drumgeely apartments. We welcome the fact that these have been added back to sheet 6 and keyplan 0006 in Appendix 1. This recognises the preferred route for pedestrian traffic to/from residential areas and the zone.

We also welcome the fact that sheets 8 and 9 of Appendix 1 respond to our Submission that alignment of the pedestrian crossings and pathways with the pedestrian bridge ramps will encourage greater use of these facilities at the main entrance to the Shannon Free Zone.

# Response to Chapter 5: EIAR Methodology

**Chapter 5** covers the methodology to be used in completing the EIAR

Shannon Chamber does not propose to comment on the technical detail. However, we would make the point that it is essential that the methodology takes account of the practical realities of local conditions. For example, the timing of pedestrian, cycling and vehicular traffic along the N19 is influenced by a range of factors including:

- Start and finish times of shifts operated by businesses on the Shannon Free Zone. For example, Ei Electronics employs over 1,000 people with a key shift change at 16:00 hours. This creates significant vehicle and pedestrian traffic at multiple zone entrances/exits at that time of the day.
- Airport traffic is seasonal (winter and summer schedules) and also operates in waves during the day. For example, during the peak summer period, there are multiple transatlantic aircraft arrivals and departures in the morning. Traffic counts undertaken in the winter period will not recognise and underestimate the impact of these aircraft movements on traffic.
- The pedestrian bridges are in regular use by pedestrians, bicycles and e-scooters and usage increases at shift start and end times. The introduction of bike-sharing stations may impact on flows of cycle traffic on the bridges and other parts of the Zone as initial teething difficulties are resolved.

These and similar points should be taken into account when deciding on the pros and cons of roundabouts versus traffic signals. The time of day and nature of traffic flows in and out of the Zone will have a significant impact on the final design solution. It is essential that proposed changes to junctions and roundabouts are reality checked against local knowledge and current traffic patterns at various times of the day and night.

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