



Limerick CHAMBER

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Limerick Chamber's Statement on draft Ireland 2040 National Planning Framework

8th November 2017

Summary of Action Points

Strategic Planning for our Regional Cities

Our regional cities and strengthening interlinks between them must be the primary focus for development, to successfully drive the national economy and the performance of the wider region. This must be reflected within the NPF as follows:

- By explicitly stating the need for interlinks and co-operation between the interconnected city regions of Cork, Limerick and Galway, to increase their combined competitiveness and synergistic impacts on their growth potential and thereby overall national performance. Enhancing these interlinks will increase the collective capacity to market the combined city regions from an economic development perspective, and will act as a catalyst for greater collaboration among the key stakeholders in these three city regions.
- By recognising that smart growth in our cities must go hand in hand with intercity connectivity.
- By including more ambitious targets on the growth prospects for regional cities as a counterbalance to Dublin; explicitly reconsidering their population projections, and clarifying whether the projections included are to be considered minimum targets rather than caps.
- By supporting higher density development in city centres; recognising limited land availability and potential environmental benefits of high density development.
- By promoting and supporting city development plans, in particular Limerick 2030, as well as other strategic development sites such as the Limerick Docklands.
- By considering the measures which can be taken and initiatives which can be supported/amended, such as the [Living City Initiative](#) (LCI), to facilitate bringing older properties in the city centre back into use.
- By recognising that successful cities require critical investment in infrastructure to benefit city region interconnectivity, particularly projects such as the M20 and Northern Distributor Road in Limerick, and improve public transport.
 - In terms of rail infrastructure, Faster rail link between Limerick and Dublin/Cork line would allow faster commute times.

Regional co-operation and a co-ordinated investment and development strategy to strengthen Ireland's second tier cities and their wider regions should be prioritised. Thus, the NPF must:

- Take account of key regional assets and their potential to drive development both within and across regions, particularly Shannon Airport and the Shannon Estuary.

In the context of **Shannon International Airport**, the NPF must:

- Recognise the strategic importance of Shannon as a key enabler for effective regional development, ensuring that it is identified a part of the Mid West Limerick City Region Metropolitan Area Plan.
- Enhance the use of Shannon Airport, by promoting better air connectivity to key strategic locations.
- Review the National Aviation Policy (NAP) to ensure it is aligned with the National Planning Framework.

In the context of the **Shannon Estuary**, the NPF must:

- Prioritise investment in transport links to Shannon Foynes Port Company (SFPC), including upgrading the road from Limerick to Foynes (N69) and reinstating the Foynes to Limerick Rail Link to maintain the Port's Core Ten-T status.
- Reflect the Tier 1 status of the SFPC, as identified in the National Ports Policy.
- Recognise the potential of strategic sites within the Shannon Estuary to drive regional and local economies.
- Key transport routes such as the N68 in Clare, which links to the Shannon Estuary in Kilrush Harbour, and the N69 which provides access to key sites on the South side of the Estuary, must be supported to advance rural communities.

Clusters

- The NPF should foster a supportive policy environment for the development of industrial clusters in the regions.

Role of Towns and Diversifying Rural Areas

- The NPF should reflect on the proposed approach taken to towns (particularly categorisation based on a population of over 10,000 for the purposes of the NPF) and rural areas. The proposed approach is believed to rely too heavily on developing responses within the existing framework, rather than identifying a desirable framework in the context of a long-term spatial plan for the country as a whole.
- Within the NPF, the role of existing distributed education campuses located in towns, which contribute significantly to regional development, needs to be clarified and future investment in them assured.
- Diversifying the economic base in rural areas must be a priority for the NPF. Thus:
 - Tourism must be recognised within the NPF as a key sector for supporting rural communities, and initiatives to further develop the tourism offering should be supported.
 - Upgrading the electricity network must be prioritised to ensure rural communities are able to realise their renewable energy potential.

1. Introduction

Limerick Chamber represents over 500 businesses in Limerick City, Limerick County, Shannon and South-East Clare, and is the largest Chamber in the Mid West region. The Chamber welcomes the call for submission into the draft National Planning Framework (NPF). Limerick Chamber actively pursues policies which support effective regional development. It is welcome that the draft Framework document recognises the need to put emphasis on developing a city-based strategy, taking account of our urban centres, regions, rural Ireland, the island as a whole, as well as land and marine development. While these aspects are critical to developing a spatial plan for Ireland, the draft document also recognises how national infrastructure can influence patterns of development and how these factors impact on the sustainability of our environment, along with our citizens' health and wellbeing.

While aligning with and building on the key priority areas highlighted in Limerick Chamber's [previous submission \(31st March 2017\)](#), this current submission focuses on several specific concerns raised when reviewing the draft Framework. **Limerick Chamber believes that the draft NPF is a missed opportunity to fully leverage on the Mid West Limerick City Region's key strengths and the interlinking of the three city regions of Cork-Limerick-Galway along the Atlantic corridor, in order to harness regional and national economic growth and development. The NPF should acknowledge how together the combined regions of Cork, Limerick and Galway can provide an economic development counterbalance to Dublin which is at strained capacity.**

2. Second Tier Cities – Economic Engines for Growth

The NPF offers the opportunity to support the development of our second tier cities in a coordinated manner, so that they are complementary to the role of Dublin as our Capital city; yet also to cohesively support the development of our cities' wider regions.

The Ireland 2040 document identifies Dublin and the other regional cities as focal points to drive more balanced growth in their relevant regions, recognising their assets in terms of centres of employment, third level institutes, and, connectivity points via their access to motorways as well as ports and airports. This focus on five city regions has the potential to help address the desire to spread development widely, in an attempt to deliver more equalised benefits to the entire population and leverage spare productive capacity within these connected central hubs.

That said, **the growth projections proposed by the draft NPF will lead to a continuation of the status quo, with almost half of the population centred around Dublin and its commuter belt. Indeed, as it currently stands, the Government's vision for Ireland 2040, as set out in the draft NPF, will prolong the existing economic imbalance evident across Ireland, and threaten future investment.** Disproportionate economic growth across the country will result in a further strain on growing

infrastructural deficits and overheating within the Capital, while the other city regions will remain underutilised.

Explicitly, under the draft framework, the NPF proposes that Dublin and its commuter belt will experience almost 50% of the predicted growth by 2040, while Cork, Limerick and Galway will experience under one-quarter of expected growth. It is submitted that these restricted population projections for the Southern Region, and in particular the Mid West Limerick City Region, should most definitely be reconsidered in the final NPF. It is unclear whether the 146,000 population target for Limerick City and Suburbs in the draft NPF (on page 47) is considered a cap; **Limerick Chamber firmly believe that this population projection should be considered a minimum target rather than a cap, and that this point should be clarified in the Document and apply to all of the city regions.**

The NPF needs to recognise that developing our regional cities, more ambitious targets on their growth prospects and strengthening interlinks and co-operation between them, must be the primary focus, to ensure more balanced regional growth and development. Doing so will drive both the national economy and the performance of its regional hubs. Given that cities generally compete with other cities for investment, by default successful cities are competitive cities. Limerick city region holds significant competitive advantage, due in part to its central location on the Atlantic corridor between Cork and Galway, its trade and tourism connectivity through Shannon Airport and Shannon Foynes Port Company, and its world class third level institutions which provide a talented workforce to support FDI and indigenous companies.

While competition clearly exists between the regional cities, together these interlinked city regions are a greater competitive, collaborative force: a point which needs to be acknowledged in the NPF. From a population projection and infrastructure planning perspective, combining the three city regions together makes sense, where the synergistic impact of the combined region can deliver stronger economic growth and development than the sum of the three individual regions. Enhancing these interlinks will also increase the collective capacity to market the combined city regions from an economic development perspective, and will act as a catalyst for greater collaboration among the key stakeholders in these three city regions. Together, the Cork-Limerick-Galway corridor provides a much more competitive economic development counterbalance to the overheated Capital.

To increase and sustain their competitiveness, our regional capitals must proactively be supported in: strengthening their highly educated workforce offering; attracting high value jobs; investing in well-developed modern infrastructure; and, supporting a high quality built environment. In many cases, the majority of the factors contributing to a competitive city are influenced by national policies, such as education and skills, as well as investment in infrastructure, and to a lesser extent by the private

sector in terms of economic diversity. Thus, it is vital that the NPF addresses the key requirement for supporting our regional cities, including the need to consolidate growth, revitalise our cities and invest in key infrastructure which will have both regional *and* national benefits.

3. Consolidating Urban Growth

Over the past number of years, we have witnessed an increasing trend towards urban sprawl. Much of this is due to the planning failures of the past, which promoted out of town shopping centres and commercial development outside of the central business districts. Many of these policies have proved detrimental to our city centres. In recent years, the majority of residential growth has been concentrated in the suburbs, resulting in many city centre areas experiencing a population decline.

It is important that the NPF promotes proper spatial planning, including well-designed higher density development in the city centres. To this end, **the NPF should support strategic higher density development which recognises the limited land availability in the cities, and offers a huge potential for energy savings and a move towards a carbon-neutral economy.** In addressing density and thus sustainable development, the issue of building height must be addressed. Restrictive planning, in relation to densities and building height, can make office accommodation and residential units too expensive in urban areas and, in turn, reduce the competitiveness of Irish cities. **It is important that the NPF promotes and supports city development plans, in particular Limerick 2030 as well as other strategic development sites such as the Limerick Docklands.**

4. Revitalising City Centres

Higher density developments alone will not suffice to promote successful cities; strategic planning needs to factor in cultural, social, urban and spatial form, movement and sustainability. High density needs to be linked with the provision of high quality amenities. Revitalising our city centres must also focus on addressing the issue of derelict commercial and residential sites. Recent data from Census 2016 indicates that there are 2,564 vacant residential units within Limerick city. Bringing older properties back into use not only benefits our city centres, but also has positive environmental impacts. **Consideration should be given to the measures which can be taken and initiatives which can be supported/amended, such as the [Living City Initiative](#) (LCI), to facilitate bringing older properties in the city centre back into use.**

5. Infrastructure

Many of the key factors necessary for successful cities require critical investment in infrastructure. In the context of Limerick City, the need to improve transport links has been identified and reiterated as a key determinant in facilitating the regeneration of the deprived parts of the city. To this end, the recent announcement by the Taoiseach that the M20 Limerick-Cork Motorway project will go ahead is welcome news, in terms of economic development for the region and beyond. The Taoiseach

confirming that the M20 would be in December's Capital Plan, and that €5 Million has been set aside to begin the work of planning and tendering is a good starting point for progressing this essential project. Coupled with the M17/M18, when the M20 is completed it will significantly improve connectivity along the Cork-Limerick-Galway corridor, further strengthening its position as a combined city region providing a strong counterbalance to Dublin, in the context of achieving more balanced economic development.

Smart growth in our cities must go hand in hand with intercity connectivity. The notion within the current NPF that regional accessibility will only be enhanced *once* the cities have achieved a critical mass (on page 123) is not practical, and will only serve to limit the potential for the cities to grow.

It is noted that there is no reference to either the M20 or Northern Distributor Road in Limerick within the draft Framework, while a number of other key infrastructure projects are referred to, mainly in Dublin and Cork. Both of these vital infrastructure projects should be explicitly referred to in the Plan. Echoing the view of other key stakeholders in the Mid West region, Limerick Chamber considers the Northern Distributor Road to be a vital component of the City's transport infrastructure and a fundamental enabler of the Limerick Northside Regeneration Project. It is well recognised that the social and economic exclusion experienced by some residents arise from their physical isolation from employment and education opportunities and other services available elsewhere in the city. Ending this isolation by investing in better transport is a key element in the regeneration of the city. Thus, improved public transport links are critical to fostering economic development, in addition to associated societal benefit. The development of this road is also vital to the creation of a 'knowledge corridor', which will link the Shannon Free Zone, the LIT Campus at Coonagh and the University of Limerick, in addition to accessibility to the National Technology Park, which is critical to attracting further FDI.

Equivalent transport bottlenecks within and around the other regional cities also need to be addressed, to mitigate their potential negative impact on economic growth. Along the Atlantic corridor, bottlenecks in one city could detrimentally impact the overall growth potential for the regional cluster.

5.1. Air Transport: Key Role of Shannon International Airport

As an island nation, air transport is vital to our economy. Reliable air services are a key factor in attracting inward investment, in addition to stimulating the growth of indigenous businesses by increasing accessibility to new markets. Air transport is also vital to tourism, a key sector for rural Ireland, by providing direct access to inbound leisure travellers.

Shannon International Airport is a vital infrastructural asset, not only for the Mid West Region, but also for the entire West coast of Ireland; it can act as a catalyst for balanced regional economic development. Shannon International Airport is the second largest airport in Ireland, with a capacity 4.5 million passengers annually. The Airport has the longest runway in the country, allowing it to cater for full laden flights to Asia and South America, and is the only airport in the country to operate with no flight time restrictions. It was also the first Irish airport to offer US Customs and Border Protection Preclearance facilities to passengers travelling to the USA. Since gaining independence in 2013, the airport has seen passenger numbers increase by 24% to reach 1.74 million passengers in 2016.

To ensure that second tier cities and their regions remain attractive to employment and in particular FDI investment, increasing direct international air connectivity is vital. Research indicates that an increase in international air connectivity will result in positive FDI impacts. Three quarters of all IDA employment located in Ireland is within US FDI companies; for which connectivity to US hubs is vital (IDA Annual Report, 2016). Over 40% of these companies are within the Shannon Airport catchment area; clearly indicating how this airport is a key influencer of US FDI decision making to locate in Ireland.

The NPF must recognise the importance of maintaining and enhancing direct air connectivity from Shannon International Airport to global markets, and the key role that Shannon plays as an enabler for effective regional development. This is particularly relevant taking account of the forthcoming challenges that Brexit present, in terms of ensuring strong connectivity from Ireland to European hubs, given that currently hub connectivity to Europe is focused on London. **The NPF should make a commitment to growing and supporting Shannon, recognising the public investment that already exists in this facility and the spare capacity currently available.**

The *Hierarchy of Settlements and Related Infrastructure* set out in the NPF specifically identifies airports as a key element of the network infrastructure for cities. **It is imperative that the strategic importance of Shannon Airport is recognised both for Limerick city and the wider region. In this regard, Shannon Airport should form part of the Mid West Limerick City Region Metropolitan Area Plan.**

5.2. Shannon Estuary and Shannon Foynes Port Company

The Shannon Estuary is a strategic asset and one of the most valuable natural resources for Ireland. The estuary adjoins the counties of Limerick, Clare and Kerry; however its impact extends far beyond this area to include not only the West coast but the entire Country. It has a depth in excess of 18 metres making it Ireland's premier deep-water resource, capable of handling vessels up to 200,000 deadweight tonnes and is connected to all major international shipping lanes.

The Estuary hosts a number of key infrastructural assets including, Shannon International Airport, the Shannon Free Zone, as well as Moneypoint and Tarbet power stations. The Estuary also has six terminal facilities under the authority of Shannon Foynes Port Company (SFPC) including: the ports at Foynes and Limerick Docklands, along with jetties at Moneypoint, Tarbert Island, Aughinsh and Shannon International Airport.

The Shannon Foynes Port Company (SFPC) is the largest bulk port in the country, with current figures indicating that it handles 20% of national port traffic and 63% of the dry bulk sector. An Economic Impact study undertaken by [W2 Consulting](#) estimates that the overall value of trade handled by SFPC, amounted to €7.6 billion in 2014, clearly indicating the importance of the Port to the local and regional economy. As outlined in [Shannon Foynes Port Company - Vision 2041](#) document, **investment in transport links to the SFPC should be prioritised, including upgrading the road from Limerick to Foynes (N69) and reinstating the Foynes to Limerick Rail Link to maintain the Port's Core Ten-T status.**

6. Clusters

The NPF Consultation Document previously recognised the need to '*develop industrial clusters where natural comparative advantages exist*' and noted how the '*existence of clusters in specific industry sectors/activities are important for regional economies*'. However, there is currently no mention of industry clusters in the draft NPF. The aviation cluster at Shannon is an important contributor to the West of Ireland economy; as are many other industrial clusters along the Atlantic corridor. **The NPF must recognise that the continued development of these clusters is vital for the development of a more balanced national economy.** Consequently, a key strategic objective should be to ensure a supportive policy environment for the development of industrial clusters in the regions.

7. Role of Towns and Diversifying Rural Areas

Concerning the role of towns, the proposed approach of redesigning rural areas to include 'small towns' of up to 10,000 population and the identification of a new category of 'large towns' with a population of over 10,000 for the purposes of the NPF could have significant implications for future investment in the Mid West region. It is suggested that **this blunt cut-off measure of 10,000 should be re-assessed**, given to targeting the achievement of a number of settlements of this size in each county relative to the size of the population; with such settlements to be identified in the County Development Plan for the County. Indeed, this town classification of 10,000 is simply fuelling the commuter belt around Dublin, and potentially hampering growth in regions with limited numbers of larger towns relative to other regions. **Furthermore, from an education perspective, the role of existing distributed education campuses located in towns, which make a significant contribution to regional development, needs to be clarified and future investment in them assured.**

The economic and social transformation that has occurred in Ireland over the past number of decades has dramatically changed rural Ireland. This is reflected in the decline of traditional rural industries and the increasing prevalence of rural dwellers commuting to employment centres in more urban areas. The future of rural Ireland must take account of dynamics where the industrial structure of our economy will continue to drive employment growth in urban areas, while at the same time recognising the need for economic diversification and development in rural areas. Rural towns in close proximity to larger urban centres have experienced sustained growth in population over the past number of years. This trend clearly reflects the interdependency between rural and urban areas. It is important to monitor these areas' ability to sustain growth pressures, in terms of impacts on their infrastructure and environment.

The diversity of rural areas in terms of their natural resources, industrial composition, locations, and population structure must be recognised, nationally and locally. Many rural areas have a locational competitive advantage in particular sectors; most notably in the tourism, agriculture, and the marine sectors. **The NPF must support rural areas, as they seek to diversify their economic base.**

8. Tourism

Tourism is a major contributor to the Irish Economy and a key sector is sustaining rural Ireland. The West Coast of Ireland offers some of the most stunning scenery in the country, as evident by the Wild Atlantic Way coastal drive. Likewise, some of the key tourist attractions including the Cliffs of Moher, Bunratty Castle & Folk Park, and the Burren are within the Mid West region. The seasonal nature of the tourism sector raises challenges for rural communities, and suggests the need to expand the market beyond the summer months. It is vital that the tourism offering is diversified to include weather-independent and more family-friendly attractions.

Tourism must be recognised within the NPF as a key sector for supporting rural communities, and initiatives to further develop the tourism offering should be supported. The success of initiatives such as the Mayo Greenway highlights how local communities can benefit greatly from smaller developments. A 2011 economic impact study of the Mayo Greenway estimates that direct expenditure associated with the Greenway would contribute €7.2m to spending within the local economy over a full year. Initiatives such as these are highly beneficial to rural economies, as visitors are encouraged to spend more time within the community thereby utilising local businesses. The potential to link such cycle-ways across regions should be explored, not only for the benefit of the tourist market, but also for the health and wellbeing of locals.

A significant element of our tourism offering is predicated on protecting our environment, so **it is vital that the NPF recognises the need to protect our natural resources; including landscape, biodiversity and water quality.** The potential for agri-tourism should also be supported within the NPF, particularly

where it can play a role is sustaining biodiversity. Similarly, local communities should be encouraged to protect their heritage, both built and natural, as a means of promoting local tourism.

The capacity for Shannon International Airport to grow passenger traffic and win a greater share of the overseas' visitor market would have positive impacts for the wider West coast. Shannon International Airport is the long-haul gateway for the Wild Atlantic Way, bringing benefits not only to the Mid West but all along the West coast; there is therefore a need to support Shannon International Airport within the NPF as a key driver of tourism. The changing composition of tourism, with a move towards attracting more European visitors, also augments the need to introduce more direct European routes into Shannon.

9. Conclusion

Strategic vision, collaboration and joined-up thinking are necessary for the regional cities, rather than focusing on extending Dublin city's sprawl. To restore more balanced development across the State, the regional cities need to grow at a faster pace than the overheated Capital. Consequently, harnessing and leveraging the growth potential of the Cork-Limerick-Galway corridor, the resultant synergistic impacts of their combination, and the interlinks and co-operation required between these regions all need to be at the core of this Plan. Together, these combined regions can provide an economic development counterbalance to Dublin, which is close to maximum capacity.

The NPF also needs to contain commitments to create the legislative and funding framework necessary to achieve the more balanced regional development outcomes sought, yet be designed in a way that is flexible and can respond to unforeseen changes and challenges, both foreign and domestic, which may have consequences for planning, infrastructure and economic policies within the State.

Finally, the objectives set out in the NPF must inform other priorities and policies, where relevant. The successful implementation of this Framework will require regional *and* national strategies to be aligned and developed co-operatively.



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