



31st March 2017

COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

By email to: npf@housing.gov.ie

The Secretary
NFP Submissions
Forward Planning Section
Department of Housing, Planning, Community
& Local Government
Custom House
Dublin 1

Re: Submission to the National Planning Framework

A Chara

The Elected Members of Clare County Council following a meeting on 6th March wish to make the following submission to the National Planning Framework (NPF). The Members welcome this opportunity to contribute to the development of a new National Planning Framework (NPF). Clare County Council supports the preparation of strategic and visionary planning framework that will promote a better quality of life for all while ensuring a balanced growth across the country to counteract the focus on the Dublin Region growth that has dominate the last decades of development in the country. This submission is set out in two parts, firstly dealing with broad issues relating to spatial planning at a national level and then progressing to set out key issues that are central to the future sustainable development of County Clare and the wider mid-west region. All of the issues set out, be they at a national or local level, are of great importance to Elected Members, citizens and the future development of County Clare and the achievement of balanced national development. Co. Clare, given its central location between the growing cities of Galway and Limerick and its connections to same via a motorway is ideally placed to maximise the spin off and to act as a support for these expanding centres of population and employment.

o **Structure of the National Planning Framework**

In order to be successful the National Planning Framework must be able to adapt to changing economic and social circumstances. Its predecessor, the National Spatial Strategy, was prepared in a time of emerging growth and economic positivity, but it experienced diminished relevance in times of economic downturn, at a point when a strategic focus on future growth was most necessary and important. If the NPF is to be successful over its lifetime, it must be resilient to a changing external environment and provide a flexible framework for sustainable growth and development.

The achievement of population targets in particular can be strongly influenced by factors such as unemployment and immigration rates. It is suggested that the National Planning Framework should not state fixed population targets but should instead aim for target percentage increases in given areas in each inter-census period that occurs during the lifetime of the strategy.

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Fostóir comhionannas deiseanna is ea
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a chuireann fáilte roimh
iarratais ón bpobal i gcoilínne



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It is suggested that a focus may be given to the growth of cities across the country and in particular the growth of Limerick City, Shannon and the surrounding area. This area has capacity to absorb increased growth over the next 20 years in terms of residential and employment potential. In supporting such a goal, it is important to recognise the unique contribution that Shannon industrial area, Shannon Town and Shannon International Airport has with not only Limerick but the wider Mid-West and national perspective.

○ **Balanced National Development**

The development of a new NPF presents an opportunity to address problems of inequity in economic resilience and prosperity between large urban areas and more rural and peripheral communities. There are opportunities for all parts of Ireland to flourish by encouraging each area to make the best use of their local assets and ensuring that the development of those assets acts as an enabler to economic growth and the building of a sustainable future.

The provision of education and targeted training is essential to halt the out-migration of young people from rural areas. Infrastructure investment is also key and this can relate to both physical and social infrastructure. Rural broadband is essential to support business development and expansion in rural areas. It also enhances social connectivity and reduces the disadvantage of peripheral locations. Rural broadband schemes have been launched by successive governments over the past two decades but the implementation of these schemes has been sporadic and many communities, in both rural areas and towns and villages, still have a very poor level of service. Broadband development is an essential component to rural development and must be an infrastructure priority in the National Planning Framework.

Under-investment in physical infrastructure is also a major inhibiting factor to population retention and growth in rural areas. Many towns and villages (population <1,500 persons) have a vibrant and growing population and offer a wide variety of services such as shops, schools and community facilities. However, these towns have been unable to support new housing or employment development due to a lack of capacity in water and waste water services. In such locations new housing, by necessity, has primarily been in the form of single houses in the surrounding countryside and potential business developments commonly seek an alternative location. Therefore the lack of infrastructure investment has rendered sustainable development and population growth within these settlements unachievable. The National Planning Framework must take account of these issues. The development of a vision for rural areas, including the towns and villages which act as important service centres, is fruitless if investment in the necessary infrastructure does not follow.

○ **Marine Spatial Planning**

There is significant potential for growth in the Blue Economy in Ireland and it has the capacity to expand the range of employment opportunities available in coastal areas and to revitalise these areas from a social and economic perspective. There is also potential for an enhanced off-shore energy contribution to the achievement of our national emissions targets. However it must be recognised that conflicts may emerge between new growth areas and existing uses. In light of the forthcoming requirements to prepare marine spatial plans for Irish coastal waters, it is important that the National Planning Framework provides high-level guidance and direction for both marine and terrestrial areas.

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The inclusion of marine areas in a national planning strategy will be a new departure in spatial planning in Ireland. The NPF must work to achieve a positive inter-relationship between developments in marine and terrestrial areas. It should support new development, such as off-shore energy production, and also balance that new development with the enhancement of environmental quality and the protection of highly important existing activities such as fishing and tourism. The merging of terrestrial and marine planning provides the potential to develop a coordinated approach that will make the most efficient use of resources, reduce environmental impacts and support high quality development.

In particular the Members of Clare County Council request that the SIFP for the Shannon Estuary is given prominence in the NPF and is shown as an example of inter-jurisdictional collaboration and a plan and environmental led approach to the development of marine related industry. Moreover the Members request that the lands zoned at Cahercon and Moneypoint are reflected in the SIFP and their opportunities highlighted. It is noted that the SIFP has been adopted by the Elected Members as part of the Clare County Development Plan 2017-2023

o **Creating a Low Carbon Society**

According to the EPA's recent State of the Environment Report: "Ireland's Environment – An Assessment 2016": *"Ireland's energy system will need to undergo a major transformation in the coming decades as part of actions to address and limit climate change. Fossil fuels, which make up about 90% of Ireland's current energy profile, need to be phased out and replaced by renewable energy resources such as wind, solar and tidal."*

It is evident that a marked transformation in our energy production is urgently required and the National Planning Framework must provide the stimulus and support for effecting this transformation. Clear leadership is required in a number of areas:

o **National and Regional Level Approach to Renewable Energy**

Given that the progression of renewable energy projects is of such vital importance, the development of renewable energy strategies on a county-by-county basis represents an extremely fragmented approach. The NPF provides an opportunity to restructure our methodology and progress a regional or national level approach to the selection of areas that are most suitable for renewable energy development, be they marine or terrestrial areas. Ireland has substantial potential for the development of off-shore energy resources and this is inherently linked with the issue of marine spatial planning, as discussed above. There is a need for decisive political leadership in the areas of Renewable Energy so that new developments can be measured and delivered in line with best national and inter-national standards. This will require a commitment to the production and circulation of national guidelines and policy statements on an on-going basis to have regard to changes in international standards and best practices.

o **Energy Infrastructure**

In order to support the necessary changes to our energy production patterns, enhancements to the electricity grid must be an infrastructure priority during the lifetime of the NPF. The

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electricity grid must be able to facilitate increased renewable energy generation, including new connections for off-shore renewable energy developments.

○ **Existing Energy Infrastructure**

County Clare is home to two nationally important energy power plants, the Hydro-electric plant located in Ardnacrusha and the Moneypoint Power Station located in West Clare. The NPF should address how the future of these power plants will be protected and should explore potential developments that could be accommodated within these sites in order that they can evolve and expand into the future. Securing these sites is considered to be a key infrastructural goal not just at a local or regional level but at a national level given their critical contribution to the power supply of the country.

○ **Public Perception of Energy Infrastructure**

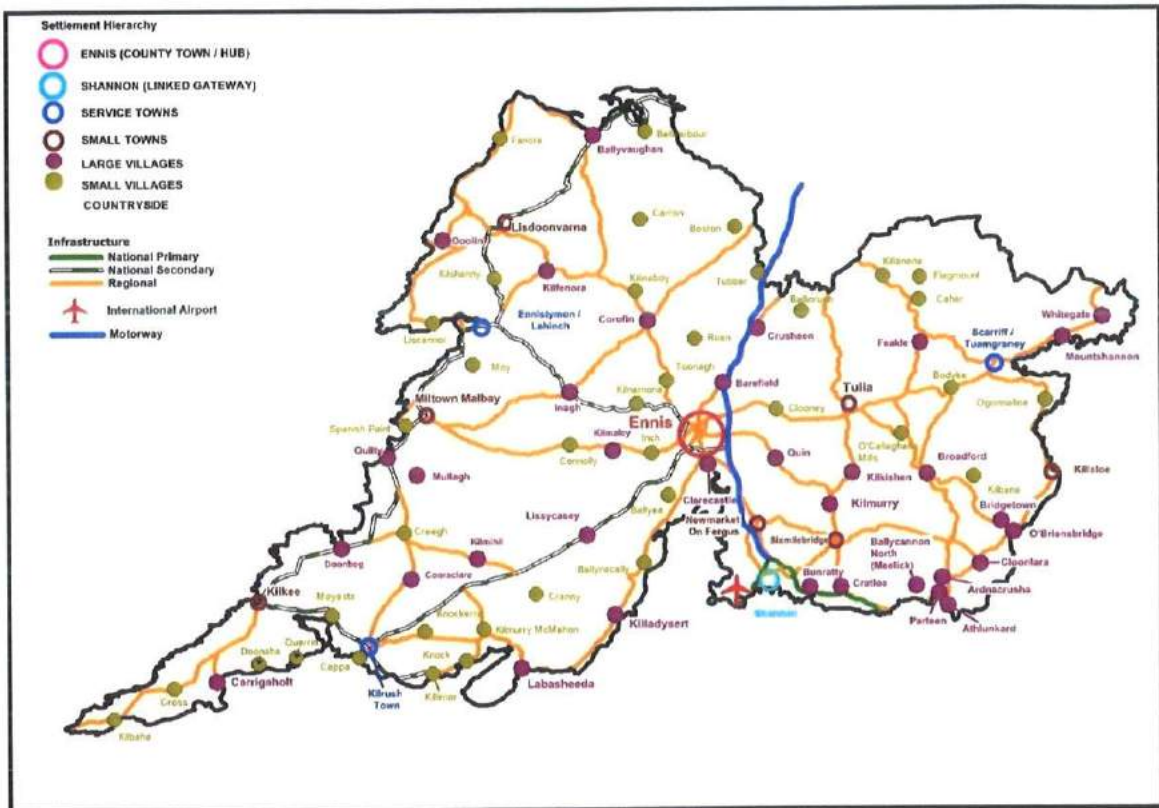
All types of energy development, whether they are wind, solar, tidal etc. generates widespread public concern and often significant public opposition. If substantial progress is to be made in the transition to a low carbon society, a fundamental issue that must be addressed is the negative public perception of energy infrastructure. The National Planning Framework must recognise this issue as a serious inhibition to energy development and must commit to analyse and address this matter if we are to meet our renewable energy targets in the coming years.

○ **The Quality and Location of Housing Supply**

Achieving sustainable patterns of residential development in urban areas, with new housing located in close proximity to town and city centres, employment locations and schools, is a key issue that must be supported in the NPF if a low carbon society is to be achieved. However, in Ireland, higher-density urban dwellings commonly have limited floor area, making town/city centre accommodation unsuitable for family living. If sustainable travel patterns are to be achieved, it is essential that a range of housing is provided so that the needs of the population, throughout the life cycle, can be accommodated, without the need to move to lower density suburban areas that are at a distance from education, employment, services etc. In order to achieve this mix in housing type the NPF needs to address the issue of densities in urban locations and needs to set a clear vision as to how our regional towns and cities are to grow into the future.

○ **Role of Towns and Villages**

In order to accommodate the expected population increase and to accommodate same at a regional level there will be a need to expand the role of our rural towns and villages across the country. The NPF should look to set out a strategy to ensure that these key service centres can be expanded, which should include a clear funding mechanism for the delivery of improved environments and for the delivery of necessary infrastructure to these centres. It is considered that the investment into these town and villages will be the key deciding factor on whether rural locations can be sustained as locations which are attractive for people to locate in.



o Role of Brownfield Sites and Areas with Potential Regeneration

It is considered that there has been a lack of focus in recent years on the potential that brownfield and derelict sites throughout the country. In order to maximise our existing resources and to ensure that the maximum benefit can be achieved at minimum costs it is considered that the NPF would set out at a national level clear guidance to ensure that brownfield and derelict sites are invested in and developed as priorities across the country. It is considered that these key sites can accommodate considerable expansion within the country in the short to medium term.

o Regional and Local Priorities

County Clare and the wider Mid-West region have significant physical, human and natural resources that can be capitalised upon in order to increase social and economic vibrancy and contribute to balanced and sustainable development at a national level.

o University of Limerick

The expansion of the University of Limerick campus is considered to be critical to the development of the mid-west region. The NPF should recognise its role within the region as a hub for education, R&D and as a stimulator for industries and employment centres to locate in the region, in particular in Limerick City and Shannon. The delivery of the Limerick Northern Distributer Road is a key to the continued expansion of the campus.

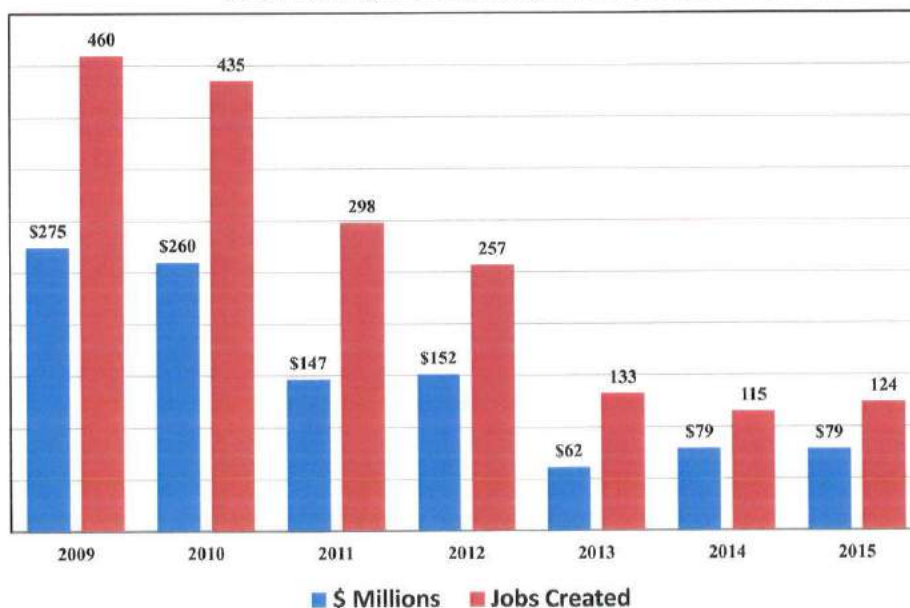
○ Shannon Town

Shannon town was identified as a Linked Gateway in the National Spatial Strategy and its status in the forthcoming National Planning Framework should continue to reflect its importance as an aviation, industry, enterprise and R&D centre. The town has ambitious plans to develop and expand the International Aviation Services Centre centred on Shannon International Airport, to work closely with University of Limerick and Limerick Institute of Technology to expand the R&D activities taking place and to implement the detailed Green Infrastructure Plan that has been prepared for the town. The continued expansion of Shannon town and Shannon airport is a critical driver in the growth of Limerick City and the future prosperity of the wider region and its importance in this regard needs to be clearly identified and built upon in the NPF. The potential of increased passenger numbers at Shannon airport should be identified and a national focus given to maximising this resource into the future. The airport has capacity for 4.5 million passengers a year and in 2016 1.74 million passengers passed through the airport.

The International Aviation Services Centre already comprises a community of 45 aerospace and aviation companies and the expansion of this cluster is being proactively progressed. Shannon is also a centre for business, enterprise, manufacturing and general industry and has grown into a major employment hub in the region. Significant potential exists for business expansion and new business development in each of these areas, building on Shannon's excellent national and international connectivity, its highly educated workforce and the high standard of living and quality environment both in the town and the surrounding area. This potential for expansion can be seen in terms of Foreign Direct Investment over the last 5 years (since 2009) this has accounted for the creation of 1,822 jobs and Shannon was the Destination of 84% of FDI in this period. It is considered that there is equal opportunities to expand the national market and to attract major employers into the region if Shannon is promoted and invested in. The NPF is an ideal opportunity for Shannon to be placed as a centre for employment expansion at a national level.

Foreign Direct Investment and Jobs Created

5-Year Running Ave FDI (\$Mns.) and Jobs Created – 84% Shannon



Linkages between Shannon and Limerick, and particular the Higher Education Institutes, are highly important to the creation of beneficial interactions between business entities and the research campuses and also to ensure that the correct mix of qualified candidates is available to attract new industries to the area. In this regard the progression of the Limerick Northern Distributor Road (LNDR) will be an infrastructure priority in the region in the short to medium term, providing direct connectivity between Shannon International Airport, the businesses and industries located in Shannon town and the University of Limerick and its associated research and learning facilities. The LNDR will be a unifying project, building connections between the key economic assets in the mid-west region. The NPF needs to recognise the importance of this key piece of infrastructure and there needs to be a political and funding commitment to its delivery.

Shannon town has huge potential to expand in terms of providing a residential and service base to support the growing employment opportunities in the area and to supplement Limerick City. In 2011 (Last Census available) there were 11,199 Jobs in Shannon. 2,549 of those were occupied by workers commuting from Limerick City and County. Based on 2014 rates, the 2,549 workers generated annual earnings of €99,613,000 – almost €100 Million. Average earnings for workers from Limerick were - €751 compared to National average €670 – indicating the high value jobs occupied by those travelling from Limerick. Based on growth in line with National performance in employment since 2011 (6%) and Earnings since 2014 (2%) the number of workers from Limerick would be 2,702 and Average Earnings would be €766. That would suggest total annual earnings of €107.6 Million at end 2016. Given this significant monetary and service contribution it is suggested that the NPF can not consider the growth and expansion of Limerick City without also focusing on Shannon as a growth centre also.

In order to enhance Shannon town from a physical, social and environmental perspective, a detailed Green Infrastructure Plan has been prepared. Green Infrastructure has extensive benefits including the promotion of sustainable travel and improved well-being and quality of life for those who live and work in the area. Most significantly, the Shannon Green Infrastructure Plan will enhance the appeal of the town as a location for future investment and economic growth and the implementation of the Plan will be a priority in the town during the lifetime of the National Planning Framework.

o **The Shannon Estuary**

One of the greatest economic and natural assets, in both the mid-west and the country, is the Shannon Estuary. With water depths of up to 37 meters, the Estuary can accommodate Post-Panamax and Neopanamax vessels and has significant potential for a wide range of using such as transshipment, marine-related industries, energy production, aquaculture, tourism and recreation. It is also an environmental resource of international importance. The Strategic Integrated Framework Plan SIFP for the Shannon Estuary has been prepared to guide the future development and management of the Estuary and it identifies a number of Strategic Development Locations along the Shannon Estuary. The progression of significant port and marine-related developments on the Estuary must be identified as a national priority in the National Planning Framework. Recognition of the importance of the SIFP plan, of the 14 steering group members drawn for a variety of groups throughout the region and the goals and potential of the plan should be included within the NPF. It is also suggested that

consideration should also be given as to how best to give a national statutory recognition to this plan given its strategic nature.

o **Ennis**

Ennis was identified as a Hub town in the National Spatial Strategy and its important role as a large town, providing services and amenities to a county-wide catchment area, should continue to be reflected in its status in the forthcoming National Planning Framework. Ennis has considerable potential to further develop as an employment centre, a retail centre, a tourism hub for the wider county and as a centre for recreation, amenity and active living. The revitalisation and expansion of the town centre, the progression of green infrastructure and active living projects and broadening of employment opportunities in the town will be key priorities during the lifetime of the National Planning Framework. In terms of physical infrastructure, the augmentation of the Ennis town water supply and the extension of water and wastewater pipelines and new road infrastructure within the town boundary to serve new development areas will be investment priorities in the medium term. It is considered essential that the NPF ensures that the regional importance of the county town is highlighted and provisions built into the plan to ensure that Ennis together with other regional towns are promoted for expansion and development and that funding mechanisms and political commitment to their development is provided within the lifetime of the plan.

o **Assets of the Wider County**

County Clare benefits from a wide range of assets that, if recognised and developed, can act as enablers for economic growth, particularly in more rural areas. The unique and high-quality environment of County Clare is a dynamic resource and the natural heritage of the county is one of its most significant assets. The county is also rich in nationally and internationally important habitats and species. It is essential that the National Planning Framework recognises these protected sites as a major asset, not only in County Clare but across all parts of the country, and works to counter the negative connotations that are often associated with the identification of a site as an area of natural importance.

On a county-wide basis there is significant potential to progress tourism development, renewable energy opportunities, agriculture and agricultural diversification and to support enterprise development and the growth of small-medium businesses. Key to this expansion will be the delivery of key infrastructural developments including the up-grade of the N85. The NPF should include targeted infrastructure to be delivered within the region which can ensure that the rural areas can expand and sustain themselves into the future and maximise the opportunities that exist from tourism.

The West Clare area has the potential to benefit from future developments associated with the Shannon Estuary, growth in the renewable energy sector, tourism activity based on the natural assets of the area and connections with the Wild Atlantic Way. There are also significant opportunities for offshore development in the areas of energy generation, fishing and aquaculture and recreational activities. Marine spatial planning will be highly important to ensure that these off-shore activities can progress without conflict. Investment in physical infrastructure will also be highly important in the West Clare area to ensure that growth is not inhibited by lack of services.

North Clare is renowned for its iconic landscape and the conservation and interpretation of this landscape will be a key element of future growth. The Burren and Cliffs of Moher Geopark and the inclusion the Burren on the UNESCO World Heritage Sites tentative list, combined with the development of the Wild Atlantic Way and strong growth in the eco-tourism and artisan food industries, make North Clare a dynamic and progressive tourism area. Further growth in enterprise and craft industries will be highly important in the coming years, as will initiatives such as Farming for Conservation, which ensure that communities can continue to grow without having a negative impact on the unique natural environment. Investment in the management of natural assets in the area will be highly important during the lifetime of the National Planning Framework. The development of a Conservation Management Plan for the Burren should also be cited as a priority, alongside water and wastewater infrastructure investment rural towns and villages in the area.

South Clare is the area with the strongest economic growth in the county and is centred on the Limerick-Shannon-Ennis economic corridor. The focus for this area will be to build critical mass in the main growth centres of Limerick City, Shannon and Ennis whilst also ensuring the surrounding towns, villages and rural areas reach their full potential. The priorities for Ennis and Shannon have been set out above. For other areas in South Clare the strategy is to ensure that settlements grow in a proportionate manner, to capitalise on the rich tourism and cultural heritage in the area and to support agricultural growth. The development of the Limerick Northern Distributor Road will be a priority in this area during the lifetime of the National Planning Framework.

The East Clare area has immense potential for growth in the coming years. The location of Killaloe on the shores of Lough Derg provides opportunity for water-based tourism and recreation developments that will support economic growth and local employment. The Sliabh Aughty Mountains are also an under-utilised resource and amenity that can be capitalised upon to support and expand local communities. Killaloe is the main retail and residential centre in the East Clare area, with Scarriff/Tuamgraney acting a centre of local enterprise and industry. The progression of tourism infrastructure and services and the provision of support for local enterprises will be a priority in the medium-term. The upgrading of waste-water infrastructure in Killaloe is essential to support future growth and the construction of a new Shannon Bridge Crossing is a key infrastructural priority for the region as it will greatly increase the accessibility of the East Clare area and also accessibility to Limerick City.

o **Funding and Implementation**

It is essential that the new National Planning Framework is concise, with a small number of clear, measureable aims for each identified area.

It should also set out an implementation timeframe for key projects across the country.

It is also important to ensure that funding mechanisms are identified and secured in order to ensure the successful achievement to the objectives of the NPF. In the absence of the

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National Development Plan, funding to secure the progression of the aims and objectives of the NPF is at risk of being fragmented and piecemeal.

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A handwritten signature in black ink, appearing to read "Bill Chambers", written over a horizontal line.

Councillor Bill Chambers

Mayor of Clare

on behalf of the Elected Members of Clare County Council