



Limerick CHAMBER

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IRELAND 2040

**Limerick Chamber Submission on the National
Planning Framework**

31st March 2017

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 National Planning Framework (NPF) and the need to ask ourselves what sort of place Ireland should be in 2040 and what we need to do in order to achieve this.

Limerick Chamber welcomes the recognition within Government that a ‘business as usual’ scenario is not desirable and will not benefit either Dublin or the Country as a whole. The Issues and Choices Consultation document sets out that the National Planning Framework will be a tool to assist the achievement of a more effective regional development and recognises that this is a key priority if the country as a whole is to achieve its potential

Limerick Chamber actively pursues policies which support effective regional development. Our view is that in the long term, the regional cities in the West will play a key role in developing a counterbalance to Dublin and will support the regional development of their hinterlands. It is recognised that while Dublin is a city of international importance for Ireland, in order to achieve the best outcomes both for Dublin and Ireland, the National Planning Framework (NPF) must support our second tier cities. The role of the West as a counterbalance must involve the collaboration of the regional cities including Galway and Cork.

It is welcome that the Consultation document recognises the need to put particular emphasis on developing a place 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 key to developing a spatial plan for Ireland, the document also recognises how national infrastructure can influence patterns of development and how these factors impact on the sustainability of our environment and people’s health and wellbeing.

This submission is structured as follows:

Section 2 discusses the place making strategy advocated within the NPF and identifies key priorities for our cities, regions and rural areas.

Section 3 outlines the priorities for sustaining our environment particularly focusing on energy and land use.

Section 4 identifies the nationally important infrastructure investment priorities that must be supported within the NPF.

Section 5 concludes by identifying the key issues affecting the implementation of the NPF.

2. A Place-Making Strategy

Placemaking and a holistic approach to planning are required to support increased quality of life and sustainable development at a national level. To ensure a well-rounded spatial planning, Limerick Chamber believes that the NPF should encapsulate a broad scope of policy areas that will enhance people's lives, communities, environment and the business landscape of the country. The role of cities and towns and their interrelationship within a regional ecosystem should be clearly planned for within the Framework.

2.1 The City – An Economic Engine for Growth

The NPF allows us the opportunity to support the development of our second tier cities in a coordinated manner so they are complementary to the role of Dublin as our Capital City yet also support their wider regions. It is positive to note that the Position Paper recognises the potential of our regional cities to be a 'focal point to drive growth in their regions, recognising their assets in terms of centres of employment, third level institutes, access to motorways as well as ports and airports.

The new focus on city regions should help address the desire to spread development widely in an attempt to deliver more equalised benefits to the population. It has been evident from the past how attempts to spread development policy failed to achieve the critical mass of economic inputs and outputs, such as skills, services, suppliers, customers, at any one point. It must now be recognised that concentration is needed by advanced economic sectors in order to grow.

The importance of our cities in driving the regional economy cannot be underestimated. In the words of Danuta Hubner, former European Commissioner responsible for regional policy:

“Cities play a vital role in creating growth and jobs. They are economic centres and motors of growth both for the wider region and for the country as a whole. In fact, I would go so far as to say a region can only be successful if its cities are successful.”¹

The key role that our cities will play in future regional development is being increasingly recognised in Ireland. Research by Forfas² reinforces this view and recognises that high-value added services are attracted primarily to urban areas, but that urban areas are also key in driving the development of their wider region.

The National Planning Framework should now recognise that our regional cities must be the

¹ Danuta Hubner, former European Commissioner responsible for regional policy.

² <http://www.forfas.ie/media/forfas100121-Regional-Competitiveness-Agendas-SouthWest.pdf>

primary focus for development if we want to drive the national economy and the performance of the wider region. The increasing recognition of the importance of cities has resulted in significant research on what constitutes successful cities. Given that cities generally compete with other cities for investment, by default a successful city is a competitive city. A recent report by the Centre for Cities organisation identified skills and education as the most important factor in the long-run success of cities. The study also found that carefully targeted infrastructure could help cities advance. These findings are also in line with research from others³ which highlighted that central features for a competitive city are:

- A distinctive city centre,
- Good connectivity to other parts of the world
- High quality residential and commercial choices
- A reputation for environmental excellence
- A highly skilled workforce
- A reputation for advanced research and innovation
- Economic diversity
- Sophisticated cultural choices.
- An inclusive and diverse society

Given that in many cases these key success factors are identified ex-post; it is often difficult to find practical approaches to improving the performance of cities. However, it is fair to say that in order to be successful our regional cities must proactively be supported in developing a highly educated workforce, attracting high value jobs, investing in well-developed 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 less extent by the private sector in terms of economic diversity. Thus, it is vital that the National Planning Framework addresses the key requirement for supporting our regional cities, including the need to consolidate growth, revitalise our cities and invest in key infrastructure.

Consolidating Urban Growth

Over the past number of years we have seen the increasing trend towards urban sprawl. Much of this is due to planning failures of the past which promoted out of town shopping centres and commercial development outside of the Central Business District. Many of these policies have proved detrimental of our city centres. Equally, we have seen how

³ Hutchins, Mary (2004), "The Meaning and Measurement of Urban Competitiveness" in Parkinson et al.

<http://www.washingtonmonthly.com/features/2001/0205.florida.html>

OECD (2006) *Competitive Cities in the Global Economy*, OECD Paris

PWC <http://www.pwc.com/us/en/cities-of-opportunity.html>

residential growth has been concentrated in the suburbs such that many city centres areas have seen a population decline.

To overcome these issues, it is important that the National Planning Framework promotes higher density development in the city centres. Higher density development 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 so reduce the competitiveness of cities.

Revitalising City Centres

Higher densities developments alone will not be sufficient to promote successful cities and it must be recognised that planning needs to factor in cultural, social, urban and spatial form, movement and sustainability.

The NPF must recognise and promote city development plans, in particular Limerick 2030. A number of key sites in public ownership, notably the Hanging Gardens, Opera Site and Cleeves, are identified within the strategy as vital for the regeneration of the city. These sites should be further supported within the NPF. Likewise other strategic sites within the city should also be supported. In particular, the SFPC landholding on the Dock road is a prime site which could revitalise the city. Inspiration could be taken from the Dundee Waterfront development in Scotland of the type of development that is possible in this area.

Revitalising our city centre must also focus on addressing the issue of derelict sites both commercial and residential. Initiatives such as the Living Cities must be encouraged and promoted with the NPF. 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.

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 as a key ingredient in the regeneration of the deprived parts of the city. 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 elsewhere in the city. Ending this isolation by investing in better transport is a key element in the regeneration of the city. Thus, transport projects such as the Northern Distributor Road and improved Public Transport are vital as discussed in Section 4.1.1 and 4.1.2.

Smart Travel initiatives have been rolled out across Limerick city over the past number of years as Limerick became one of Ireland's demonstration cities for smarter travel. The concept of active travel is now an assessment criterion for transport projects⁴, further reflecting its importance from a national perspective. Additional smart travel initiatives should be supported further within the NPF as a means of improving movement within the city, promoting sustainable travel and improving our health and wellbeing. Furthermore, in order to facilitate more active travel, the NPF must recognise the need to link transport planning to economic development and land use.

2.2 Regional Assets Driving Regional Economies

The need for improved regional co-operation and a coordinated investment and development strategy to strengthen Ireland's second tier cities and their wider regions is clearly recognised in the Issues and Choices consultation document. The Atlantic Corridor concept was a by-product of the National Spatial Strategy and although it was never completed the concept of connecting the regional cities along the corridor remains valid. By connecting the cities of Cork, Limerick and Galway, it is possible to facilitate collaboration thereby allowing the cities to drive regional performance along the corridor. On this basis, the completion of the motorway network connecting these cities should be a key national priority (see section 4.1.1) within the National Planning Framework. Equally, the Ring Road around Galway and Cork together with the Northern Distributor Road around Limerick (see section 4.1.1) are key infrastructure priorities for completing the Corridor whilst investment to support Shannon Airport and Shannon Estuary will be key to supporting effective regional development.

There is also a need for the City Regions to work together to maximise investments in key infrastructure which can assist in making regions more successful, while at the same time achieving value for money. The NPF must take account of key regional assets and their potential to drive development both within and across regions. In the context of the west coast, two key assets which should be recognised and promoted under the NPF are Shannon International Airport and the Shannon Estuary.

2.2.1 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 but also in stimulating the growth of 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 for

⁴ Project Appraisal Guidelines – DOT

the entire West coast of Ireland and 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 per cent to reach 1.74 million passengers in 2016.

From a business perspective, costs are generally lower in regional cities compared to Dublin, thus resulting in businesses gaining competitive advantage through their location in regional areas. However, regions can only compete with Dublin if they benefit from good transport links serving internal as well as external destinations. It is well recognised and has been noted in discussions with both the Limerick Chamber and IDA Mid-West that the air connectivity provided by Shannon International Airport has been a key factor in the decision of many multinationals to locate in the Midwest and adjacent regions.

However, there is also evidence that in many cases investment opportunities have been missed in the regions due to a lack of air connectivity. In fact, the decision by Kerry Group to invest in a new plant in the Greater Dublin Area was due to the need to access the connectivity provided by Dublin Airport⁵. The decision by Kerry to invest in a new plant in Naas has resulted in the closure of one of their offices in Kerry but also resulted in a lost opportunity for the wider region as the lack of air connectivity deemed it unsuitable for expansion plans. This decision clearly highlights how air travel is a critical factor in supporting current and future businesses in the regions.

It is vital that the NPF recognises Shannon International Airport as Ireland's second airport for both national and international air travel. The NPF should seek to maximise the capacity which exists within existing airport infrastructure nationally. Maximising the use of regional assets has environmental and regional development benefits and ensures a value for money return on investment. In this regard, the NPF should promote the potential of Shannon International Airport's capacity and its connectivity to 40% of the country's population to deliver an additional 2.5 million passengers into Ireland. Specifically, the NPF should support Shannon International Airport as follows:

Ten T Core Status for Shannon International Airport

Shannon International Airport currently has Ten-T Comprehensive status within the Trans

⁵ The Sunday Business Post, 26th February 2016.

European Transport Network (Ten-T). The comprehensive network constitutes the basic layer of the TEN-T network, while the Core network consists of the strategically most important elements of the network. The Ten-T networks aims to ensure the smooth functioning of the internal market and strengthening economic and social cohesion. Clearly, there is an immediate need to elevate Ireland's second largest airport to Core status. To do so would reflect the importance of air connectivity for the development and integration of the regional cities and their wider hinterlands with the rest of the EU and recognise the national significance of the second largest airport for Ireland. The NPF must elevate Shannon International Airport to the TEN T core network.

Aviation Policy must align with NPF

If the NPF is to be the guiding document for the development of our country, with a focus on supporting effective regional development and our second tier cities, it is vital that the 2015 National Aviation Policy should be updated to align with it. Currently, much of the growth in passenger numbers is centred on Dublin Airport, which is further adding to its monopolistic position. Unregulated growth of Dublin Airport's market share will not be in the national interest and will require careful regulation in the future if the Limerick, Galway and Cork cities are to drive their regions development in terms of attracting FDI, developing tourism and supporting indigenous industry.

Regional Air Service Support

Enhanced, direct air connectivity from the west coast of Ireland to the key European and North American business markets is a key priority for supporting effective regional development. The NPF must recognise the need for increased direct air connections between Shannon International Airport and key European and American airports which should be supported through a targeted program of air service assistance development.

2.2.2 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 is the largest bulk port in the country with current figures indicating that it handles 20 per cent of national port traffic and 63 per cent of the dry bulk sector. An Economic Impact study undertaken by W2 estimates that the overall value of trade handled by SFPC, amounted to €7.6 billion in 2014⁶ clearly indicating the importance of the port to the local and regional economy.

Recent work undertaken by SFPC including their masterplan, Vision 2041, along with the Strategic Integrated Framework Plan for the Shannon Estuary highlights the potential for the Shannon Estuary to support Effective Regional Development. The initiatives identified in these documents should be reflected in the NPF. It is vital that the significance of the ports must be recognised, and actively promoted in the NPF, if their full economic potential is to be realised in the future.

Ten T Port

The importance of SFPC is recognised at a European Level with Shannon Foynes Port designated as a core port within the Trans European Transport Network (TEN-T). However, the Ten-T Core Port status requires that all core ports are connected to the European Core Rail and Road network by 2030. Consequently, the road network between, Foynes, Limerick and Dublin has been identified as part of the Core Road Network and thus is requested to meet minimum standards for such route classifications. Likewise, the rail-link to Foynes port has been designated a core rail freight network. It is vitally important for Ireland and the West Coast, that Shannon Foynes retains its Ten-T Status. The NPF must recognise this and further prioritise investment in the transport links to the port including upgrading the road from Limerick to Foynes (N69) as well as reinstating the Foynes to Limerick Rail Link.

Tier 1 Port

The National Ports Policy identified 'Ports of National Significance' as Tier 1 ports which are:

- 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.

The policy document specifically states:

'those ports considered to be of national significance must be capable of the type of port capacity required to ensure continued access to both regional and global markets for our trading economy. Government expects the Ports to lead the response of the State commercial ports sector to future national port capacity requirements'

⁶ Shannon Foynes Port Company Economic Impact Assessment, August 2016

The NPF must reflect the Tier 1 status of the SFPC. Furthermore, the NPF should recognise and support the development of the port and its connectivity to the hinterland in order to meet future demand and capacity requirements.

Strategic Development Locations

There are a number of significant landbanks within the Shannon Estuary that have been identified as Strategic Development Locations for marine and large scale industrial development. Each of these sites has significant potential in terms of driving the regional economies. This potential has been recognised by the various local authorities that adjoin the Estuary with each of them amending county development plans to take account of these sites and by zoning the land for marine related development. The nine sites include:

- Innismurry/Cahercion
- Moneypoint
- Foynes Island
- Lands to Rear of Foynes
- Askeaton
- Aughinish Island
- Tarbert
- Ballylongford
- Limerick Docklands

It is critical that the NPF also recognizes the potential of these strategic sites to drive the regional and local economies. Furthermore, the NPF should recognize the need to upgrade utilities including gas, electrical supply and IT services within the key sites in order to attract and support a cluster of modern port related industries.

2.3 Diversifying Rural Areas

The economic and social transformation that has taken place in Ireland over the past number of decades has resulted in a 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.

As recognised in the CEDRA report⁷, rural towns in close proximity to larger urban centres have experienced sustained growth in population over the past number of years. This trend

⁷ Energising Ireland's Rural Economy, Report Of The Commission For The Economic Development Of Rural Areas, 2014.

clearly reflects the interdependency between rural and urban areas and its importance of sustaining some rural communities. However, it also poses concerns in terms of the areas ability to sustain these growth pressures, in terms of infrastructure and the impact on the environment.

Equally, it must be recognised that for more peripheral rural areas population decline has been evident for some time and there is a need to support these communities as they seek to diversify to changing economic and demographic challenges. The decline in population which has largely centred on younger cohorts has had knock on implications for the local labour market with many of the more educated and skilled workers leaving the area. Coupled with this is the emerging issue of an aging population in more rural areas and the need for services to support this population group.

2.3.1 Diversifying the Economic Base in Rural Areas

The aforementioned trends indicate that a one size fits all approach does not apply to rural areas and it is vital that this is recognised within the NPF. 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 competitive advantage in particular sectors due to their location most notably in the tourism, agriculture, and the marine sectors. The NPF must support rural areas as they seek to diversify their economic base.

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. However, the seasonal nature of the tourism sector also 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 in spend in 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 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 in sustaining biodiversity. Likewise 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 a need to support Shannon International Airport within the NPF as a key driver for Tourism all along the West Coast. The changing composition of Tourism, with a move towards attracting more European visitors also raises the need for introducing more direct European routes into Shannon. As set out in Section 2.2.1, the NPF should advocate for supporting Shannon via a targeted program of air service assistance development.

Agriculture

The agricultural sector, which has been a mainstay for much of rural Ireland in the past, is also seeing significant changes which will impact on the long-term sustainability of the sector into the future. Agriculture is the single largest contributor to Ireland's overall Greenhouse Gas emissions, accounting for over 30% of the total, however, it is also a significant contributor to the National economy with the agri-food sector contributing €24 billion per year⁸. Recent changes to farm practices such as the abolition of milk quotas should see an increase in production with Food Harvest 2020 estimating a 50 per cent increase in the period from 2010-2020. Increased production levels will have knock-on implications for employment in the sector and the long-run sustainability for family farms. The NPF should support the Food Harvest 2020 policy document while also recognising that environmental sustainability is an essential requirement for food production in the future.

Marine

As set out in previous sections, the Shannon Estuary offers a number of opportunities for coastal areas and their hinterland to develop a strong industry base particularly in the energy, tourism and seafood sectors. The NPF must support the development of key

⁸ https://www.epa.ie/media/epa_agriculture_v2.pdf

industry in these areas in order to ensure the long term viability of rural Ireland. In particular, the key strategic development sites (section 2.2.2) within the Shannon Estuary need to be recognised within the NPF. These sites have the potential to create significant economic and employment benefits for the local community. In particular, the potential of a LNG facility on the Ballylongford site was noted as having the potential to create 650 construction jobs as well as 100 permanent jobs once completed⁹. Not only would this significantly benefit the local economy, the facility could act as a catalyst for further development in the Estuary. Moreover, the NPF must support marine policy including the National Ports Policy as well as the Marine Plan: Harnessing our Ocean Wealth.

2.3.2 Enabling Infrastructure for Rural Ireland

Enabling Infrastructure, in the area of digital, transport and energy will be needed to support and growth rural economies.

Broadband

If business in rural areas wants to expand and become more productive, it is vital that appropriate broadband is provided. Moreover, improved digital infrastructure will allow for flexible working patterns and online learning which will have positive impacts on the skills base, on the environment in terms of reduced commuting and can benefit the wellbeing of our population in terms of work life balance. Limerick Chamber views the National Broadband Plan as a vital infrastructure investment for rural Ireland and the need for a robust digital infrastructure must be recognised within the NPF. However, the ongoing delay in rolling out Broadband is a continuing cause of concern. The latest figures from ComReg show that Ireland continues to lag behind the EU average for broadband per capita¹⁰. While Limerick Chamber supports the roll out of the National Broadband Plan, it must be recognised that wireless broadband will not be delivered in the short to medium term and ultimately may not be delivered to all parts of the country due to natural constraints. Thus, Limerick Chamber believes that it is vital that other technologies must be supported to ensure that appropriate connectivity is provided to rural areas. In this regard, fixed wireless under licenced spectrum should be supported between now and when the fibre plan is delivered.

Transport Network

While bearing in mind the need to move towards a low carbon society and the impact that increased commuting is having on our environment it is still necessary to ensure that our national secondary road network is maintained to a standard that can support the regional and rural economy. In particular, key 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

⁹ <http://www.limerickleader.ie/news/home/205272/Shannon-Estuary-LNG-plant-still-a.html>

¹⁰ Irish Communications Market Quarterly Key Data Report Data as of Q4 2016 ComReg

South side of the Shannon Estuary will be critical in supporting the economic development of rural communities.

Energy Infrastructure

The NPF must support and promote community owned renewable energy projects as discussed in more detail in Section 3.1. Such schemes have significant potential not only to contribute to Ireland's 2020 targets but also support the sustainability of local communities by diversifying the local economy over the long-term and opening up new sources of income for residents. In enabling rural communities establish renewable energy projects, it is necessary that the electricity network is upgraded to accommodate the increasing share of renewables coming on stream.

2.4 Summary of Action Points

Our regional cities must be the primary focus for development if we want to drive the national economy and the performance of the wider region. This must be reflected within the NPF as follows:

- Support higher density development in the city centres, recognising the limited land availability and the potential environmental benefits of high density development.
- Promote city development plans, in particular Limerick 2030 as well as other strategic development sites such as the Limerick Docklands.
- Support initiatives such as the Living City which aims to bring older buildings back into use.
- Recognise that successful cities require critical investment in infrastructure, particularly projects such as the Northern Distributor Road and improved Public Transport.
- Promote sustainable travel and build on previous smarter travel initiatives as a means of improving movement within the city.

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

- Complete the Atlantic Corridor, connecting the cities of Cork, Limerick and Galway.
- Prioritise the completion of the motorway network connecting the cities as well as the various ring roads around Galway and Cork as well as the Northern Distributor Road in Limerick.
- 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:

- Elevate Ireland's second largest airport to Core status within the Ten-T network.

- Ensure the 2015 National Aviation Policy is updated to align with the NPF.
- Recognise the need for increased direct air connections between Shannon International Airport and key airports which should be supported through a targeted program of air service assistance development.

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

- Prioritise investment in transport links to 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 the regional and local economies.

The economic and social transformation that has taken place in Ireland over the past number of decades has resulted in a dramatically changed rural Ireland. 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.
 - Protecting our natural resources including landscape, biodiversity and water quality must be recognised as a key success factor for our tourism offering.
 - The potential for Agri-Tourism should also be supported particularly where it can play a role in sustaining biodiversity.
 - Local communities should be encouraged to protect their heritage, both built and natural, as a means of promoting local tourism.
 - Shannon International Airport should be supported as a key driver for Tourism all along the West Coast.
- Agriculture and related policy should be supported within the NPF, in particular Food Harvest 2020.
- Marine industry should be promoted as a driver for rural Ireland recognising the economic potential for strategic sites within the Shannon Estuary.
- Marine policy including the National Ports Policy as well as the Marine Plan: Harnessing our Ocean Wealth must be recognised within the NPF.

Enabling Infrastructure, in the area of digital, transport and energy will be needed to support and growth rural economies namely:

- Appropriate connectivity to rural areas must be supported within the NPF, particularly the roll out of fibre broadband but also fixed wireless broadband.
- 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.

- Upgrading the electricity network must be prioritised to ensure rural communities are able to realise their renewable energy potential.

3. Ireland's Unique Environment –Sustainability

The NPF must take into account the importance of spatial planning for the sustainability of our environment. It is positive to note that the Issue and Choices Paper recognises that a number of challenges for Ireland includes: *'the need to accelerate action on climate change and renewable energy, dealing with air quality problems in urban areas, health risks to drinking water, treating urban waste water and protecting important and vulnerable habitats'*.

Ireland is obliged under the EU Effort Sharing Decision to reduce greenhouse gas emissions by 20 per cent on their 2005 levels by 2020. Current trends indicate that Ireland will not achieve these targets¹¹. This trend highlights the need for action on a number of fronts, including in the area of Energy and Land Use.

3.1 Energy

In addition to our obligations under the EU ESD, Ireland is also legally obliged to deliver 16 per cent of energy from renewable sources by 2020 under the 2009 Renewable Energy Directive. It is envisaged that this will be met by 40 per cent from renewable electricity, 12 per cent from renewable heat and 10 per cent from the renewable transport sector.

In addition to these targets, the Energy White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' sets out a vision for a low carbon energy system whereby emissions from the energy sector will be reduced by between 80 per cent and 95 per cent, compared to 1990 levels, by 2050, and will fall to zero or below by 2100. Clearly these ambitious targets require a number of clear actions which should be reflected within the NPF.

Supporting Strategic Energy Zones

On shore wind energy has made a significant contribution to Ireland's move towards renewable energy; however it must be recognised that we now need to move towards ocean, offshore wind, bioenergy and solar energy. The NPF must prioritise suitable renewable energy projects across the country balancing the need for environmental sustainability and protecting our landscape amenity. It is positive to note that the consultation document recognises that certain areas of the country are more suitable for renewable energy initiatives and that this should be supported with the designation of Strategic Energy Zones.

The Shannon Estuary is an ideal location for the promotion and development of a range of

¹¹ National Mitigation Plan March 2017

energy initiatives both renewable and non-renewable. The Estuary is capable of and already handles the biggest ships in the world in the range of 200,000 tons and has the capability to accommodate even larger ships which are becoming more prevalent in the future. Thus, there is significant potential to develop the Estuary as a maritime deep sea hub which could facilitate key sectors such as energy. The Shannon Estuary is already home to major energy infrastructure in terms of the power stations at Moneypoint and Tarbet and the existing planning permission for a LNG Facility at Ballylongford. There is further potential to develop the Estuary as an energy hub and facilitate the move towards more renewable energy, particularly tidal and offshore wind. In this regard, the port facilities, in Limerick Docks should be promoted for the testing, research, manufacture, storage, assembly and deployment of marine energy devices and other technological devices. The potential of the Estuary to act as a Strategic Energy Zone should be recognised and supported within the NPF with the Shannon Estuary designated as an Ocean Energy Hub.

Energy Security and Diversification – A Role for LNG

It is noted in the White Paper, Ireland's Transition to a Low Carbon Energy Future 2015-2030, that a low carbon future will involve moving away from coal and oil towards gas. It is recognised that even if Ireland meets a reduction in GHG emissions of 80-95 per cent by 2050, fossil fuels would still account for 19-30 per cent of final energy demand. Thus, while accounting for a much smaller proportion, non-renewable energy will still be a significant component of our energy mix. Secure competitively priced natural gas supplies are thus a vital requirement for the economic competitiveness of Ireland. It is inevitable that as we move away from fossil fuels, gas will play an increasing role in the Irish Energy Market.

Security of energy supply is an essential economic requirement. Currently, circa 90 per cent of Ireland's total gas requirements are imported via the Interconnector with the UK, and this continues to be the case even with the Corrib gas field. Research indicates that a one day loss of supply via the interconnector in UK would result in an economic cost of €350 million and €640 million per day¹². The proposed Shannon LNG facility in the Shannon Estuary has a vital role to play in improving our energy security, particularly in the context of Brexit.

The proposed LNG Facility would be a major addition to Ireland's energy infrastructure. Should difficulties arise with supply through the UK, itself now a gas importer and no longer a member of the EU, Shannon LNG would have a considerable beneficial impact. The LNG facility would make it possible to source natural gas from a diverse range of countries and suppliers, and specifically countries other than those from whom we will source supplies by pipeline. Such an approach would improve the diversity of supply and by default improve our energy security.

¹² How much does it cost the economy when essential services are interrupted? Seán Lyons and Edgar Morgenroth ESRI Research Bulletin 2013

Supporting LNG would also be in line with our Energy Policy as the White paper recognises that Ireland will need to enhance energy security and specifically mentions the need to examine gas infrastructure projects. The white paper also specifically mentions the need to develop a national policy to underpin and support the deployment of infrastructure for the use of alternative transport fuels, including LNG. The development of the LNG facility at Ballylongford in the Shannon Estuary would further support regional development and the rural communities that reside within the catchment of the site as discussed in Section 2.2.2. The potential for LNG in the Shannon Estuary needs to be recognised and supported within the NPF.

Empower Local Communities in Renewable Energy Production

The NPF must recognise the objectives set out in the energy white paper which states that *'citizens and communities will increasingly be participants in energy efficiency and in renewable energy generation and distribution'*. However, the NPF must go further and actively support and encourage community owned renewable energy projects. The White Paper on Energy states that the Government will *'facilitate access to the national grid for designated renewable electricity projects, and develop mechanisms to allow communities receive payment for electricity'*.

While these statements are welcome, it does pose some ambiguity around the ability of community owned initiatives to gain access to the grid. Many of Ireland's rural communities particularly those on the west coast have the potential to support renewable energy projects, most notably onshore wind energy. By promoting community owned renewable energy projects communities can contribute to Ireland's 2020 targets whilst also supporting the sustainability of their local communities.

Enhancing Infrastructure

Increasing the share of renewables coming on to our electricity network requires both expansion and upgrading of the grid. This will be critical to achieving our 2020 targets for renewable energy. Furthermore, it will be vital that grid enhancement take account of the needs of industry and ensure that grid enhancement supports the development of key business parks and industrial zones particularly in the regions. Upgrading the grid will also be critical to ensuring that more rural communities are enabled to contribute to electricity generation and realise their renewable energy potential.

3.2 Land Use

The past number of decades has witnessed a significant proportion of development take place in a dispersed fashion. This is reflected both in residential development which has continued to exhibit a ribbon development pattern in rural Ireland as well in commercial

development where there has been an increase in out of town/suburb developments. Clearly this pattern of development is impacting not only on the land use in these areas, but also has implications for water, wastewater, air quality and biodiversity. It is important that the NPF recognises that unsustainable land use will have implications for future generations.

Development and Land Use

As identified in Section 2.1 the NPF must promote the development of our cities and in particular, higher density development in the city centres. Higher density development recognises the limited land availability in the cities and offers a huge potential for energy savings and a move towards a carbon-neutral economy. Such an approach will also better align development with transport planning. In addressing density and thus sustainable development, the issue building height must also be addressed.

In line with supporting urban centred development, it must also be recognised that the pattern of ribbon residential development in rural areas which has prevailed in the past is not sustainable. This type of development contributes to car based commuting and is also putting increased pressures on our natural heritage and the provision of necessary amenities and infrastructure. Whilst recognising the need for some individuals to reside in more rural areas, it is important the NPF encourages residential development within town and villages or cluster type developments which have a greater ability to support necessary services particularly in terms of water and wastewater.

The impact of residential development on water and wastewater has been a key policy priority for a number of years, as reflected in the introduction of Water Services (Amendment) Act 2012 to regulate wastewater discharges from all homes that are not connected to the public sewer network. However, the NPF must also address the need to upgrade the public water and waste water infrastructure in a number of towns and villages. It is well documented that a number of urban waste water treatment facilities are inadequate and that raw sewerage is entering our waterways¹³.

There is also a need for the NPF to support the move towards a higher building standard for both residential and commercial development. While a number of improvements have been undertaken to promote the building standard for residential development, as noted by the Irish Academy of Engineering, there is a need to strengthening of the building regulations for the commercial sector¹⁴. The NPF must recognise that in both residential and commercial development, the use of renewable energy and heat options should be

¹³ <http://www.irishtimes.com/news/environment/raw-sewage-flows-into-water-at-43-urban-areas-epa-report-says-1.2879755>

¹⁴ Irish Academy of Engineering November 2016 IRELAND'S 2030 GREENHOUSE GAS EMISSIONS TARGET An Assessment of Feasibility and Costs Ref. No. 01/07B/11.16

promoted. Equally, the NPF should encourage a move towards passive or near zero buildings in both residential and commercial sectors.

3.3 Summary of Action Points

The importance of spatial planning for the sustainability of our environment must be reflected within the NPF. There is a clear need for action on a number of fronts, notably in the area of Energy and Land Use.

In relation to Energy, the following actions are now required:

- The potential of the Estuary to act as a Strategic Energy Zone must be recognised and supported within the NPF, with the Estuary designated as an Ocean Energy Hub.
- The development of the LNG facility in the Shannon Estuary must be promoted as a means of improving the diversity of our energy supply, improving our energy security, and supporting regional development and the rural communities that reside within the catchment.
- Community owned renewable energy projects must be supported as a means of contributing to Ireland's 2020 targets whilst also supporting the sustainability of their local communities.
- Upgrading the grid will also be critical to ensuring that more rural communities are enabled to contribute to electricity generation and realise their renewable energy potential.

In relation to Land Use, the NPF must support:

- Higher density development in the city centres, recognising the limited land availability in the cities and offering potential for energy savings and a move towards a carbon-neutral economy.
- Residential development within town and villages or cluster type developments, as these have a greater ability to support necessary services particularly in terms of water and wastewater.
- The need to upgrade the public water and waste water infrastructure in a number of urban areas.
- A move towards a higher building standard for both residential and commercial development, particularly the use of renewable energy and heat options as well as a move towards passive or near zero buildings.
- Better alignment of development both residential and commercial with transport planning.

4. Equipping Ireland for Future Development – Infrastructure

It is well known that capital investment influences patterns of development and economic growth and so it is imperative that spending on infrastructure must be prioritised in line with the objectives of the NPF. For that reason, coherent and clear linkages between the objectives set out in the NPF and the objectives of the Mid-Term Review of the Capital Plan are essential. A coordinated investment and development strategy is needed to strengthen Ireland's second tier cities and their wider regions. A key priority for the regions should be to maximise connectivity in the most efficient and cost-effective way. It is well recognised that creating better linkages between key centres has positive impacts on promoting the wider regions. It is imperative that we make the best use of the infrastructural assets we have both from a regional and national perspective but also to ensure that future investment addresses infrastructural deficits.

The Limerick region has significant national infrastructure assets in terms of Shannon Foynes Port, Shannon International Airport, a number of power generation stations, a range of third level institutions and a strong road and rail network. These national assets are vital to facilitating the growth not only of the Limerick City Region but also the wider western region from Cork to Galway and beyond. While there is excess capacity in some key infrastructure assets to deliver in the medium term, such as Shannon International Airport and Shannon Foynes Port, there are a number of deficits in strategic areas which need to be addressed in order to develop the potential of the west coast.

Currently, population and economic growth is merely resulting in much of the investment maintaining a steady state rather than actually improving the situation. There are a number of emerging physical infrastructure gaps, in areas such as roads and housing, which could constitute a constraint on growth in the future. Furthermore, despite large-scale investment in the past, inadequate road and public transport infrastructure is resulting in rising economic costs in terms of increasing commuting times and distances with knock on implications for leisure time and the environment.

4.1 National Important Infrastructure Projects

4.1.1 Road Investment

Road transport investment can enable productivity growth, deliver time savings, reduce congestion, save lives, and lead to better environmental outcomes. By affording access to domestic and international markets, appropriate transport infrastructure aids the competitiveness of the enterprise base and facilitates regional development. A number of national important road projects need to be advanced in the Limerick City Region.

M20 Motorway

The proposed M20 motorway route is a highly significant commercial route linking the cities for Limerick and Cork. It also further improves the links between the cities on the Atlantic Corridor connecting Cork, Limerick and Galway. An important factor in affecting the performance of the regional economy is maintaining reliable and resilient connections between the regions and key cities, as well as between the regions and international markets. Connecting regional cities to one another allows for greater regional collaboration, which is in line with good spatial policy.

The M20 is a major infrastructure element that needs to be addressed to support our second tier cities. Connecting the cities of Limerick and Cork is crucial in attracting in and sustaining investment to the cities and region, and will ensure that the two cities can benefit from each other's individual strengths. The proposed M20 motorway will allow easier access to international markets via their respective ports and airports, which is a necessity for firms operating on the global markets. Furthermore, by linking the two cities, the proposed M20 motorway will extend the catchment area of the two cities and support the populations in the main towns in the catchment area.

Northern Distributor Road

The Northern Distributor Road could act as a catalyst for further development in our city and region. The proposed road provides a significant improvement in connectivity by improving accessibility into the city centre, business parks, the education institutes and Shannon Airport, all of which is crucial in attracting in and sustaining investment. A significant proportion of education and employment opportunities are concentrated in the East and South of the city. The population of Limerick needs easy access to these employment and educational opportunities. The NDR allows this by integrating the north of Limerick more conveniently with the N18 and N7; as well as allowing easy access for those in the east of Limerick access employment areas in the west of Limerick and vice versa.

Without improvements in the road network there will be limited capacity for growth within the National Technology Park (NTP). The NTP is the largest business park under the remit of the IDA in Limerick and has a significant amount of land which can be developed. Under the Action Plan for Jobs, the IDA intends to develop a 55,000 square foot office block on the site. Of course, any potential development within the NTP will be subject to a planning permission process which will take account of the receiving road network. As the current road network is suffering capacity and safety constraints the prospect of further development of the NTP is likely to be curtailed.

An inability to develop the NTP will have serious implications in terms of Limerick's ability to attract FDI with knock on implications for job opportunities for our current population of

workers as well as future graduates. These concerns have been reflected by both industry leaders in the region as well as the IDA and Enterprise Ireland¹⁵. In the event that development within the NTP is curtailed, this would have serious implications for the local economy. A development of the scale proposed by the IDA would have substantial benefits for Limerick City and County Council and the local business. In terms of the former, a large office development of this nature would result in a significant contribution in terms of commercial rates paid by the tenants on the site, while local authority development contributions would be made to LCCC as a result of the construction activity. A development of the scale proposed by the IDA would also result in a number of construction jobs within the local economy and further support jobs once completed.

Limerick is also very fortunate to have three third level centres of education which is a key factor in attracting FDI. More and more collaboration between centres of education is becoming critical to building the skills base of the region, as is collaboration between education and industry. The Limerick Institute of Technology has identified the Northern Distributor Road as key in terms of improving access to their current campus as well as their new campus at Coonagh, while University of Limerick have also stated it will be important to expansion plans at the University. Both the University and Institute of Technology are key factors in increasing educational attainment which has knock on implications for the development of indigenous industry, the expansion of current business and in attracting more high value foreign investment.

Many of the key factors necessary for successful cities require critical investment in the area of transport links. In the context of Limerick City, the Fitzgerald report identified the need to improve transport links as a key ingredient in the regeneration of the deprived parts of the city. 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 elsewhere in the city. Ending this isolation by investing in better transport is a key element in the regeneration of the city. Although the residents of Moyross will be the most obvious beneficiaries of the integration effects arising from the road it will generate similar benefits for all residents of North Limerick city. By improving connectivity across the city, the road will also support all areas of the city in achieving its potential.

Limerick to Foynes Road (N69 Route)

The Limerick to Foynes Road is vital to the development of Shannon Foynes Port, the deepest water port in the country. Shannon Foynes Port is designated a Core Port as part of the European Union Ten-T Transportation Network. Consequently, the road network between, Foynes, Limerick and Dublin has been identified as part of the Core Road Network

¹⁵ <http://www.limerickleader.ie/news/home/241337/rejection-of-limerick-s-northern-distributor-road-would-be-disastrous-for-jobs.html>

and thus is requested to meet minimum standards for such route classifications. Thus, the upgrade of this route should be recognised within the NPF as a nationally important infrastructure project

The proposed road upgrade will benefit businesses and commuters on the route alike, through reduced journey times, improved journey time reliability and safety between Foynes and Limerick for all road users. However, the completion of the road will also allow SFPC to expand services not only within its hinterland but also towards the east of the country and potentially alleviate congestion in Dublin Port. Current projections for port traffic as set out in the SFPC Vision 2041 indicate that HGV volumes along the N69 could increase by an additional 1,370 HGV vehicle movements to and from the Port of Foynes per day by 2041. As the route includes an Adare bypass, it is also in line with the objectives set out in the Infrastructure and Capital Investment Plan which identifies this bypass as a priority project and which would also benefit the urban rural interconnection which has supported a number of rural areas in recent years.

N24 and N21 Road Upgrades

Investment in a number of national primary road should also be supported within the NPF. In particular the N24 and N21 road should be upgraded. Investment of in these routes will not only benefit the Mid-West but also facilitate access to other regions including the Waterford and Kerry.

4.1.2 Public Transport

Public Transport both in terms of Rail, Bus and Tram/Bus Rapid Transit (BRT) Schemes will become increasingly important in future years as we seek to limit the environmental damage arising from increased commuting. At present the public transport network for the Limerick City and wider region is inadequate with little integration of the various modes in the public transport system. As we move towards a low carbon economy, greater public transport investment will be necessary. Furthermore, investment will need to be better aligned with land use in terms of residential and commercial development.

Rail investment has a role to play in supporting regional development and improving overall competitiveness. Rail travel contributes to improved productivity by allowing users to undertake work on rail journeys, reducing travel times and allowing direct travel between central business districts. Likewise Bus and BRT is important to allow the efficient movement of people within our cities. The success of these schemes in other cities shows the potential benefits for commuters. Both the rail and bus network should play a key role in supporting the growth of our regional cities and towns, taking account of the growing demand arising from their economic development.

Intercity Rail

It is imperative that there are direct rail services from Dublin to the regional cities. Currently there are only four direct services from Dublin to Limerick, while the rest connect with the Dublin to Cork train at Limerick Junction. This results in Limerick being the only regional city without all direct services to the capital. It is well accepted that the requirement to interchange at Limerick Junction is a barrier to travel. In fact, the 2030 Rail Network Strategy Review found that that the rail market share for the Limerick to Dublin route was 'hampered by the requirement for interchange at Limerick Junction'. It is imperative that the National Planning Framework supports the introduction of direct services between our cities.

Furthermore, the NPF must support the improving the travel times from Dublin to Limerick if Rail is to become an attractive travel option for business, commuter and leisure users. A travel time of at least 1.30 hours between Limerick and Dublin as proposed in the Rail Review 2030 must be supported by the NPF while in the longer term the electrification of the key rail lines linking regional cities should be promoted.

Fast and reliable travel times are particularly important for promoting effective regional development. By facilitating fast direct rail links from Limerick to Dublin, the Mid West skills base will be opened up to a wider labour market, while the Tourism sector will also be supported particularly in providing access to the Wild Atlantic Way.

Commuter Rail

An increasing emphasis on sustainability will result in a greater demand for public transport. Whilst it is recognised that the current low levels of patronage pose difficulties for future investment it is important that in the long term the potential of rail to cater for commuter travel is considered. In the context of Mid-West, it is recognised that significant commuter rail travel is currently not a dominant mode of travel, however efforts should be made to further encourage commuter rail.

The Limerick Ballybrophy line, which has been mooted for closure, transits the village of Annacotty in close proximity to the National Technology Park and the University of Limerick. Consideration should be given to the potential of commuter travel on this line if a station could be located in close proximity to key education and employment centres. Likewise the Ennis to Limerick line offers commuter travel into Limerick with a stop in Sixmilebridge. The potential for additional commuter stops needs to be investigated including reopening the station in Cratloe and new stations in Moyross and Parkway. The potential to offer a direct link from the Limerick Ennis line all the way to the University of Limerick and the National Technology Park should be explored as should a direct link to Shannon International Airport.

Freight Rail

The reinstatement of the Foynes to Limerick freight line is critical to the continued development of Shannon Foynes Port. As the largest deep water Port in the Country, and recognised as a Ten T Port, it is vital that the Limerick to Foynes Rail Link is reopened as a nationally strategic freight link and is recognised as such within the NPF.

Bus/Tram/BRT Investment

The increased emphasis on sustainable transport and smart travel has resulted in initiatives to encourage more car commuters onto public transport. As economic recovery takes hold and given the rise in population growth anticipated over the coming years, particularly given the ambitions sets out in the NPF whereby 75 per cent of population growth will be focussed on the regional cities, there is a need to consider investment in BRT. The potential for a Tram/BRT scheme was identified in the Limerick Metropolitan Framework Study and further was recognised by Bus Eireann who undertook a feasibility study on the prospect of a BRT in 2008¹⁶. The proposed plans within Limerick 2030 to facilitate a greater student presence in the city centre would also support investment in such a scheme. The NPF needs to consider the potential for a BRT scheme in Limerick City.

4.2.3 Property Investment

Residential Property

Recent trends in the residential property market in Limerick and the Mid-West show that the region is experiencing strong price growth both in transaction prices and rent levels. The strong price growth reflects the continuing lack of supply into the market. It has been noted by the Minister that under the NPF it is foreseen that some 75 per cent of population growth in the future will occur outside Dublin¹⁷. It has also been advocated that much of this growth will be concentrated in our city regions. The previous population projections carried out by the CSO indicate that the population growth in the in the Mid-West will result in the need for an additional 19,000 housing units by 2031. This implies some 1,300 residential units per annum. This estimate is conservative as it does not take account of obsolescence or changing family structures including the move towards smaller families and an increase in divorce rates. It will be important that the NPF recognised how this will impact on the demand for housing units of different sizes.

Equally, residential development must take account of the move towards a low carbon economy. A move towards passive housing should be supported as should revitalising older housing units. It is worth noting that according to 2016 Census there are currently 18,500

¹⁶ Limerick Metropolitan District Movement Framework Study, 2014 Arup.

¹⁷ <http://www.irishtimes.com/news/politics/cities-to-be-focus-of-growth-under-simon-coveney-plan-1.2917908>

vacant housing units in the Mid-West. With a demand for something similar over the next number of years, the focus should shift to using the stock we have. An additional concern regarding housing supply growth is the problem of urban sprawl and insufficient density. Irish housing has conventionally been of low density. Building housing on traditional patterns of development places considerable strains on land constraints. It also promotes car based development, which is likely to be unsustainable in the long run.

Commercial and Industrial Property

In a similar matter to the issues set out above the NPF must support commercial and industrial development in a sustainable manner ensuring the transport planning and commercial developments are aligned. In the context of commercial office development, the NPF should promote high density development and should recognise and support the commercial development initiatives set out in Limerick 2030, which seeks to revitalise key city centre sites while also having positive environmental impacts.

4.2.4 Digital Infrastructure

As set out in Section 2.3.2 the National Broadband Plan is a infrastructure investment priority and the need for a robust digital infrastructure must be recognised within the NPF. While Limerick Chamber supports the roll out of the National Broadband Plan, it must be recognised that wireless broadband will not be delivered in the short to medium term and ultimately may not be delivered to all parts of the country due to natural constraints. Thus, Limerick Chamber believe that it is vital that other technologies must be supported to ensure that appropriate connectivity is provided to rural areas. In this regard, fixed wireless under licenced spectrum should be supported between now and when the fibre plan is delivered.

4.2.5 Energy

As set out in Section 3, Ireland needs to proactively support our move towards a low carbon economy. This will necessarily involve more investment in renewable energy particularly, offshore, marine, solar and bioenergy, and thus the associated upgrade to the electricity grid to support this. The NPF must recognise that upgrading our energy infrastructure is vital to our economy and regional development. In addition to the upgrade of our electricity infrastructure, the NPF must support infrastructure development in other forms of energy sources. The proposed LNG facility in the Shannon Estuary is an important development not only from an energy security point of view but also from an economic development perspective.

4.2.6 Education

Continued investment in education infrastructure is critical to the development of national and regional economies and for promoting an innovative, knowledge-based economy.

Limerick is fortunate to be home to a number of well renowned Higher Education Institutes (HEIs) including the Limerick Institute of Technology (LIT), the University of Limerick (UL) and Mary Immaculate College. Each of these HEIs deliver a large number of high-quality programmes which cover virtually all branches of enterprise and many areas delivered by the public sector. The impact of these HEIs extend far beyond the Limerick City region and support the skills base for much of the Mid-West and beyond. UL caters for 15000 students while LIT has four campuses in Limerick city, with additional campuses in both Thurles and Clonmel as well as a Regional Learning Centre in Ennis.

The HEI's in Limerick also have a strong track record of advancing research in the region and the research capacity in the HEIs have been expanding in recent years. The growth in research capacity clearly reflects recognition by the HEIs that innovation lies at the heart of enterprise success and research is the driver of innovation. A significant number of Innovation Partnerships have been undertaken by LIT in recent years, with a research focus on resolving the technical and process problems of industry. Likewise, UL's aims to be a research led university characterised by excellence in research, building critical mass in translational research and delivering research that benefits the economy and society. This ambition has been reflect in recent initiatives including the setting up of the Bernal Institute in Science and Engineering; LERO, the Irish Software Research Centre and the Health Research Institute (HRI).

The HEIs also recognise the importance of supporting local and other entrepreneurs to establish and run successful businesses as well as collaborating with industry. Both institutes are actively engaged in supporting the startup community through enterprise and innovation centres. LIT is engaged with six enterprise centres throughout the region running four of them and actively participating in another two. This is the biggest engagement of any IoT and University in the country to enterprise development and helped create over 600 jobs between 2007 and 2014. UL also is active in industry-supporting centres and institutes including: LERO, Synthesis and Solid State Pharmaceutical Centre, Dairy Processing Technology Centre which represent an investment of €130.5 million and 85 industry partners. Clearly the emphasis on research and industry collaboration is a key factor in further supporting the region's economic development.

While both HEI's in Limerick are clearly playing a critical role in advancing the regional economy, it is clear that over the past number of years, there has been significant underinvestment in the Education sector. This lack of investment is hampering Ireland's ability to attract students and researchers and limiting our ability to develop the enterprise base further. It is worth noting that in the case of UL 38 per cent of graduates progress to employment in Mid-West region while some 60 per cent find employment elsewhere in the state (with the higher proportion finding employment in the Greater Dublin / East region).

This represents under-utilisation of the region's human resource potential and shows the importance of creating more work opportunities for graduates in the local and regional economy.

As we look to Ireland 2040, it is imperative that the NPF recognises the key role of HEIs in supporting regional development. In this regard, the NPF must recognise the shortfall in investment which is at odds with the increase in demographics and the talent gaps identified by companies. The NPF must support the continued development of our HEIs as well as our primary and second level institutes. The key contribution of HEIs, such as LIT and UL, to the development of the regions needs to be acknowledged within the NPF. Equally, their investment needs in terms of capital, operational costs and staff must be supported. The role of HEIs in providing the applied research required by companies also needs to be acknowledged and the investment needed to realise this potential supported. In this regard, the NPF should align with other Government policy and recognise the priorities identified within the Institutes Capital Investment Programme.

There is significant potential for the University of Limerick to expand further northwards into County Clare into their existing land-bank. Likewise, LIT also has significant expansion plans including a new campus at Coonagh. These plans are critical to the continued provision of a highly skilled labour market to the region, to attracting economic investment, and retaining the vibrancy of local population. The Limerick Institute of Technology has identified the Northern Distributor Road as key in terms of improving access to their current campus as well as their new campus at Coonagh, while University of Limerick have also stated it will be important to expansion plans at the University. This further reinforces the need for the road as set out in Section 4.1.1.

4.2.7 Health Care

It is evident from the preceding issues that a range of factors impact on our health and wellbeing. The impact of development on the land use has implications for air and water quality while transport planning can influence active travel with associated health benefits. As Ireland moves toward 2040, our demographics tell us that we are facing a number of key issues notably an aging population but also countered with one of the highest fertility rates in Europe. It is imperative that the NPF recognises the need to continue to invest in healthcare. Improving the health service offerings for the entire region is important not only for our current population but also in attracting people to the region and thus supporting effective regional development. The NPF must recognise that the merger of the university and maternity hospital is a key priority for improving the health service of the entire region and has been delayed for far too long. Equally the NPF must plan for our aging population and support them in both a community based setting and recognise the need for

the provision of nursing home facilities.

4.3 Summary of Action Points

Capital investment influences patterns of development and economic growth and so it is imperative that spending on infrastructure must be prioritised in line with the objectives of the NPF.

A number of national important road projects need to be advanced in the Limerick City Region namely:

- The M20 is a major infrastructure element that needs to be addressed to support our second tier cities and complete the Atlantic Corridor
- The Northern Distributor Road is vital for the local Limerick and regional economy particularly to facilitate further development of the National Technology Park and attract additional FDI to the region as well as supporting the regeneration of the deprived parts of the city.
- The Limerick to Foynes Road (N69) is vital to the development of Shannon Foynes Port, particularly in maintaining its Core Ten-T Status.
- Upgrades to the N24 and N21 will benefit the Mid-West but also facilitate access to other regions including the Waterford and Kerry.

Greater public transport investment will be necessary as move Ireland moves to a low carbon economy and this must be prioritised within the NPF:

- The introduction of direct rail services between Dublin and Limerick must be prioritised as well as improving travel times. A travel time of 1.30 hours must be supported while in the longer term the electrification of the key rail lines linking regional cities should be advanced.
- Commuter rail must be considered, particularly the potential for additional stations along the Ennis-Limerick line at Cratloe, Moyross and Parkway as well as along the Limerick-Ballybrophy line.
- A direct link off the Ennis Limerick to Shannon International Airport should be investigated.
- The reinstatement of the Foynes to Limerick freight line is critical to the continued development of Shannon Foynes Port.
- The potential for a Tram/BRT scheme for Limerick must be considered.

In the property sector, the NPF must recognise the following key issues:

- Residential development must take account of the move towards a low carbon

economy. Passive housing should be supported as should revitalising older housing units.

- High density commercial developments should be promoted as should the commercial development initiatives set out in Limerick 2030.
- Overall alignment of property developments with transport planning must be encouraged.

A number of other infrastructure priorities must also be promoted including:

- The need for a robust digital infrastructure must be recognised within the NPF, it is vital that fibre broadband as well as, fixed wireless under licenced spectrum are supported to ensure that appropriate connectivity is provided
- Upgrading our energy infrastructure is vital to support an increase in renewable energy.
- The merger of the university and maternity hospital in Limerick and the need to plan for our aging population; supporting them in both a community based setting and recognising the need for the provision of nursing home facilities.

Continued investment in education infrastructure is critical to the development of national and regional economies particularly in terms of attracting FDI and developing indigenous industry. The NPF needs to recognise the key role of HEIs in supporting regional development. In this regard, the NPF must:

- Recognise the shortfall in investment which is at odds with the increase in demographics and the talent gaps identified by companies.
- Support the continued development of our HEIs as well as our primary and second level institutes.
- Acknowledge the key contribution of HEIs, such as LIT and UL, to the development of the region.
- Support the investment needs of our HEIs to realise their potential.
- Align with other Government policy and recognise the priorities identified within the Institutes Capital Investment Programme.

5. Implementing

In order to successfully implement the NPF, the following characteristics will need to be central to the implementation strategy of the Framework;

Co-Operation

Government now has the opportunity to support more effective coordination and integration amongst a wide array of stakeholders in order to achieve effective regional development.

The objectives set out in the NPF must inform other priorities and policies. It is also positive that there is recognition that the NPF will need to be supported by more detailed strategies at a regional and local level and at a sectoral level. From this perspective it is vital that other Government policy also supports the priorities set out in the NPF. Specific mention has been made of the need to coordinate policies such as the Capital Plan as well as the National Climate Change Adaptation and Mitigation Strategies. However, there is a need that all Government policy supports the objectives set out in the NPF. A vital requirement will be the need to ensure that the National Aviation Policy is aligned to the NPF.

It has been further recognised that administrative and organisation boundaries may not always neatly coincide with the issues that a planning framework seeks to address. This is particularly the case for key infrastructure assets in the Mid-West, such as Shannon International Airport and Shannon Estuary. Both of these assets sit within the Southern Regional Assembly but which also have a significant bearing on the development of the Western Regional Assembly. Similarly at a more local level the University of Limerick crosses the counties of Limerick and Clare. These issues clearly indicate the need for a collaborative approach by the local and regional authorities to implementing the plan and the need to recognise that functional rather than administrative boundaries may be more important.

The successful implementation of the National Planning Framework will require regional and national strategies to be aligned and developed in close co-operation, and should include strategies on economic development, environmental protection and sustainability, decarbonisation, transport and energy infrastructure, broadband

Political Support

One of the most important lessons learned from past experience with the National Spatial Strategy is that without political buy-in from elected representatives, any spatial planning

framework may fail due to potential resistance at local level regarding planning decisions. Experts have recommended that it is imperative that the political process is properly engaged, both in the design and implementation phase, so that planning decisions taken at regional and national level have adequate political support. Therefore, a Government led change in political culture and buy-in is required if the NPF is to succeed where the NSS failed.

Flexibility

In addition, It is recommend that the NPF must be designed in a way that is flexible and can respond to unforeseen changes and challenges, both foreign and domestic, which have consequences for planning, infrastructure and economic policies within the state. This can be done through regular and clearly defined reviews of the Framework with regard to its outcomes and whether or not it is meeting its targets.

Regular Assessment and Ongoing Dialogue

In line with our own previous recommendations, a cross-departmental approach, with a regular period for assessment via an independent monitoring mechanism that reports to the Oireachtas will be instrumental in ensuring that the NPF can evolve and be adapted as required.



Limerick CHAMBER

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