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Limerick Chamber

Submission to the Limerick Development Plan 2022 - 2028

September 2021

**Introduction**

Limerick Chamber is the largest business representative body in the Mid-West, with over 420 member organisations who support over 50,000 jobs across the region. The opportunity to provide input to this process is welcomed, with the Limerick Development Plan providing an opportunity to present a vision for Limerick’s growth to 2028 and beyond.

The decline in both footfall and private investment in the city centre over the past decade has had a detrimental effect on businesses in Limerick City and the impact of the COVID-19 pandemic has only exacerbated these effects. While the ambitions of this report are welcomed, included in this submission are key recommendations which Limerick Chamber feel are essential to include in the final report. The Chamber is confident that the recognition of the high-level points included in this submission from our own independent assessment through collaboration with Indecon on ‘Future Limerick’ will no doubt support the successful delivery of a sustainable agenda for Limerick’s future economic and social development. Each section of this submission contains responses to certain chapters of the current Limerick Development Plan draft.

**Chapter 1: Introduction, Vision and Strategic Overview**

* Limerick Chamber welcomes the increased focus on sustainability and placemaking as part of the new strategic vision which commits to Limerick “becoming a green city region on the Shannon Estuary connected through people and places” by 2030.
* While it is important to acknowledge the strengths that Limerick possesses, it is even more important to acknowledge the challenges it faces. In the case of the interlinked strategic objectives on page 8, reference is made to promoting and enhancing the “competitive advantages of Limerick, including its strategic location, connectivity and accessibility to international markets, a skilled workforce and a high quality of life”. A competitive advantage refers to attributes that enables an entity to outperform its competitors. A 2019 report by Copenhagen Economics showed the challenges facing Shannon Airport in terms of its international connectivity, while a 2021 report by Indecon showed the educational and health gaps that exist between Limerick and other Irish cities. Limerick certainly has the potential to build on its existing strategic assets, but it is misleading and premature to claim that we have a competitive advantage across these areas.
* Limerick Chamber welcomes the commitment to the Sustainable Development Goals but asks that clarity be given in relation to the proposed implementation model. The main document refers to a 10-minute model, however the Limerick 2030 review background document refers to a polycentric approach. The Chamber also asks the LDP to consider an alternate approach to our city’s model of sustainability. Previous analysis conducted by Indecon for Limerick has established that no one specific model ticks all of the boxes for Limerick, such as the 10/15-minute models, the doughnut model, etc. In Indecons analysis, they have constructed a hybrid model, taking various elements from each of the aforementioned models as well as other models of sustainability into consideration. The proposed ‘Future Limerick Model’ is one that targets key areas of growth and development for Limerick moving forward. This model also puts an emphasis on greater connectivity and compact growth, but links into other important areas relevant to Limerick achieving sustainable growth. Reducing social exclusion, better linkages between Higher Education Institutes and enterprises in the region and an increased presence of high skill and higher value activities within the region are examples of some of the components of the proposed Future Limerick Model.

**Chapter 2: Core Strategy; Chapter 3: Settlement & Housing Strategy**

* Limerick Chamber has concerns regarding the depiction of population projections within the main documents. Given the importance of city centre revitalisation and the role that developments in suburbs have played in reducing footfall, it would be more useful for longer term monitoring if city centre projections were kept separate from suburbs/environs. Separate quantifiable targets for housing in the city centre should therefore be included to observe progress on housing developments in Limerick City Centre.
* Limerick Chamber also asks that clarity be given as to whether historical undersupply since 2016, which has resulted in many 25-29 years old’s having to live with parents, has been factored into housing need projections.

**Chapter 4: A Strong Economy**

* The three largest economic sectors in Limerick identified in section 4.3.1 of this report are Construction, Wholesale and Retail Trade and Professional, Scientific and Technical Activities. This is based on the number of active enterprises; however, a more appropriate indicator is the share of employment per sector. In this context, the recent Mid-West Economic Insights report for April 2021 highlights that Industry, Human Health and Wholesale & Retail sectors as the three largest sectors.
* The Chamber would also like to highlight the contrast in tone between LDP Chapter 4 and the background retail strategy document. The recognition that the retail sector in the city centre “has been in decline in recent decades” is welcomed in the main draft. Planning decisions which have allowed out of town shopping centres to flourish have severely impacted the retail sector in the city centre, this combined with the increased presence of online shopping has only exacerbated this issue. However, in the background documents provided for the retail strategy it appears as if a different view on the performance of the city centre is taken. A much more positive stance on the city centre is presented with claims that Limerick City is “performing satisfactorily and fulfilling its role as the primary retail centre of the County”, with much less recognition towards the decline of the retail sector in recent years. This is evident throughout the ‘Town Centre Health Check’ chapter of the background document in section 5.3 on Limerick City. The much more realistic view present in the main document is welcomed, with the recognition that there is work to be done to address the key issues associated with the decline in both footfall levels and the retail sector in Limerick City Centre.
* While other Irish cities generally perform better regarding the tourism sector given their close proximity to coastal areas, the Chamber still feels as if it is important that the LDP recognises the opportunity that exists to develop the tourism sector in Limerick City Centre. This advantage that other cities have over Limerick should not be used as an excuse but instead be viewed as an initiative to introduce more innovative strategies. The Chamber believes that significant opportunities exist to develop Limerick city as a visitor destination in line with Fáilte Irelands planned investment and promotion of Limerick as a Gateway City on the Wild Atlantic Way. These developments, along with the Councils expected future management of King Johns Castle and the anticipated opening of the International Rugby Experience on O’Connell Street should be reflected in an up-dated tourism strategy. Fáilte Ireland have also indicated their intent in investing in the Limerick Milk Market. It is important that the LDP recognises the role that the Limerick Milk Market plays in enhancing the vitality of Limerick City Centre for the enjoyment of residents and visitors alike. Tourism has been marked as a key sector for future growth and will play an important role in Limericks economic development going forward.
* Project Ireland 2040 projects that the population of Ireland will grow by a further 1 million by the year 2040. Limerick Chamber feels it is essential that the LDP acknowledges the need for a ‘Future Urban National Strategy’, given the release of a rural development strategy earlier this year. National Policy Objective 2a under the National Planning Framework (NPF) targets 50% of this population and employment growth to be within the 5 urban areas of Ireland. This clearly signals a need for such a strategy to cope with the growth. The recent report on ‘Future Limerick’ by Indecon further highlights the need for an Urban National Strategy, with this also being supported in recent discussions with the Tánaiste.
* Limerick Chamber welcomes the commitment to “enhancing the vitality of the City Centre through a mixture of uses, reuse of vacant units, increased residential population and revitalisation”. The Chamber firmly believes that compact, sustainable urban neighbourhoods within the city centre are needed in order to achieve long term sustainable footfall to support retail. Previous analysis by Indecon has highlighted that Limerick City currently has a lower population density than other cities such as Galway and Dublin, signalling the opportunity to introduce policies to encourage compact growth without putting a strain on current resources.
* Plans to introduce a joint-use space for the higher education institutes (HEI) in the city centre are welcomed by the Chamber. The benefits of such a facility were highlighted in a recent report by Indecon on the future development of Limerick City.
* Limerick Chamber calls for a stronger commitment within the LDP to address youth unemployment. This has been an area of concern in Limerick for the last number of years and has been further exacerbated by the Covid-19 pandemic. Analysis undertaken by Indecon found that Limerick’s share of youth unemployment has increased from 12% to 15% throughout the Covid-19 pandemic. Allocating resources to local level services such as the Limerick Youth Service to support young people in Limerick is crucial to providing access to training, education and work experience opportunities to the affected cohort in Limerick. Limerick Chamber believes that the implementation of national plans to address youth unemployment such as the establishment of a one-stop-shop Youth Desk will be a valuable asset in addressing this key concern. Cooperation at national and local level is essential in order for the delivery of such services to be successful, and this needs to be acknowledged in the LDP.

**Chapter 6: Sustainable Mobility and Transport**

* Limerick Chamber welcomes the commitment in the LDP to the delivery of key infrastructure assets such as the M20, the N69 Foynes to Limerick and the Limerick Northern Distributor Road. These projects will play a key role in enhancing Limerick’s connectivity both locally and nationally. Limerick Chamber recognises the importance of each of these infrastructure projects individually and the role they will play in unlocking the regions potential. Enhancing the connectivity of Limerick will be crucial for regional balanced growth moving forward and will enhance the regions ability in providing a genuine counter balance to Dublin.
* Limerick Chamber seeks clarity on how climate goals will be monitored at local level for both the aforementioned projects as well as other/future pipeline projects. This should be a central component of any LDP as it will be used as a guiding template for individual projects going forward.
* References to ‘behavioural change measures’ and ‘micro-mobility’ are also welcomed as these were not covered in the original LSMATS draft.
* Objective TR 018 refers to protecting existing bus services. Passengers have for several years now reported poor performance across a number of existing services. Limerick Chamber contends that the objective therefore should be to expand and enhance existing services, rather than the current stated objective within the draft which aims to “protect existing bus services”.

**Chapter 9: Sustainable Communities and Social Infrastructure**

* Chapter 9 does not acknowledge the health challenges that Limerick continues to face particularly with regards to childhood asthma and obesity. The LDP must support a more proactive and quantifiable approach to addressing these challenges. Furthermore, it does not acknowledge the connection between adverse health conditions and areas of deprivation as was previously highlighted by Indecon.
* The commitment to further development of third level institutions into the city centre is welcomed. However, it is important that required resources are provided to address the skills deficit in the region. The Chamber calls on the LDP to recognise the need to develop the appropriate facilities to address these concerns. Under Objective SCSI O12 in chapter 9, a fourth facet should be added which commits to delivering teaching, research & development and innovation facilities. Student enrolment in higher education has grown exponentially over the last number of years (12% between 2012 – 2018 and is expected to grow by a further 19% by the end of 2030. The increased facilitation of appropriate levels of student accommodation must also be committed to within the LDP to cope with this growth.

**Chapter 10: Compact Growth and Revitalisation**

* Limerick Chamber has concerns regarding a separate chapter on compact growth being included at such a late point in the document. Supporting compact growth is crucial not just for ensuring proper provision of services for a growing population but for combating the climate emergency. The development of compact growth will also create a sustainable level of footfall which is crucial to reviving the retail sector in the city centre. The opportunity to transition towards more sustainable and active modes of transport will also become more apparent as both the housing and population density in the city centre improves. An in-depth discussion on compact growth should therefore either precede or be included as part of the Settlement and Housing chapter.

**Chapter 13: Implementation and Monitoring**

* This chapter gives no guidance regarding the standard of monitoring or data collection that should be required as part of all projects that are active during the lifespan of the LDP. Limerick Chamber requests that the LDP acknowledge the need for a public dashboard that provides citizens with data and information on key projects for Limerick’s development. Projects moving forward need clear and quantifiable targets in order to provide transparency on their progress and development. Establishing Key Performance Indicators (KPIs) for these larger projects will allow for a sense of accountability ensuring that these projects are monitored on a constant basis. We have seen in the past how difficult it can be to monitor progress in large scale projects such as the Limerick 2030 project. Having only 3 quantifiable targets set which were not regularly monitored throughout meant that identifying the progress of the Limerick 2030 project between 2014 – 2021 was unclear. Frequent and detailed monitoring and collection of data must be a factor that the LDP addresses moving forward.