

National Planning Framework Review **2024**



**Limerick
Chamber**
Advancing business together

Submission - 12 Sept 2024

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Introduction & Summary

Limerick Chamber would like to thank the Department of Housing, Local Government and Heritage for the opportunity to submit our members' views on the 'Review of the National Planning Framework'.

Limerick Chamber is the largest business representation organisation in the Mid-West boasting a membership of 400 businesses and over 50,000 employees. Limerick Chamber represents a wide array of businesses across the region from local retailers, indigenous exporters to Multinational Corporations and everything in between.

Through Project Ireland 2040, and its constituent parts of the National Development Plan (NDP) and the National Planning Framework (NPF) the Government has recognised the importance of rebalancing the economy through regional development.

While we commend the Department in bringing forward the review, Limerick Chamber recommends a number of changes prior to the final review.

Both Shannon Foynes Port and Shannon Airport are key pieces of national infrastructure, and are critical assets to the economic, social and energy growth of the Mid-West. They need to be included as key growth enablers. Furthermore, to compliment the work of Shannon Foynes Port and indeed the Shannon Estuary Economic Task Force, the Shannon Estuary itself must be included as a key growth enabler.

Furthermore, it will be a huge missed opportunity to not include Transport Oriented Development as an enabler for growth. Bus Connects has been finalised for Limerick, the rail line to Foynes will soon be up and running, as well as a new train station in Moyross. These plans need to act as a foundation for TOD in Limerick and the Mid-West, as must be recognised as critical policy.

It is concerning that both Georgian Limerick and plans for Limerick Docks have been removed as enablers. Limerick Chamber does not agree with this approach, both areas serve to provide residential and commercial space with the Georgian core adding huge value to protecting our built heritage while providing residential options - if supported correctly.

The pattern of residential development, and thus, economic development is hugely concerning to the Chamber. The built up area, where 40% to 50% of housing is to be built, is far too broad. This will see the continuation of residential development in suburban areas of Limerick, no incentive to build in the core city centre. Without a distinct target in the NPF to build in the core city centre, the city will be increasingly hollowed out, and sprawl will continue. Furthermore, this means 60% of residential development is to take place outside Built Up Areas, this number must be revised downwards unless we want to encourage more sprawl in our city and county. Furthermore, while we see the value of the Land Development Agency the rate of pace of advancing their own developments in Limerick has been far too slow to make any impact in the short or medium term and there needs to be quicker action.

Under the plan, Dublin, despite already reaching its "targets" will be responsible for significant population and jobs growth. Under the plan, without a specific focus on aviation, Dublin will continue to dominate with 86% of the yearly passenger share. An outlier in Europe and a key economic risk to the regions.

In the final draft of the plan, we would like to see the upper limit of the population growth rate for the regions reinstated to act as a true lever for regional development. While we understand the NPF review has taken account of population growth since the 2018 publication and thus targets may look like they have been revised downwards, there is still the core concern that Dublin will continue to dominate, unnecessarily.

Finally, employment availability is a key driver of general employment. The NPF review must reinstate employment targets and must commit to delivering 75% of these jobs outside Dublin with the 50:50 parity target remaining. Of course, other social infrastructure is critical to employment growth. We are all too aware in the Mid-West of the need to drastically improve the health system, we must advance the delivery of a new hospital capable of adequately supporting both our existing population and future growth. Without this investment we will not be able to achieve the goals of the NPF and wider Project Ireland 2040.



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Key Growth Enabler Observations

While we welcome the inclusion of many growth enablers for Limerick included in the Draft National Planning Framework (NPF) Review. The pace at which some of these have been delivered since the initial launch of Project Ireland 2040 and thus the NPF have been incredibly poor. We also have concerns regarding the enablers that were removed from the 2018 version. There are also some items we believe should be added to the key growth enablers list, these are opportunities that have presented themselves since the 2018 NPF.

Identifying infill and regeneration opportunities to intensify housing and employment development

In October 2019, the Land Development Agency (LDA) announced that they will begin to examine the potential for a 50-hectare site bordering Colbert Station in the City Centre. In March 2020 the team to undertake a design review was announced. In September 2020 the draft design review was complete. A public consultation on the draft design review was undertaken until November 2020. A Spatial Framework for the site was eventually completed in May 2022. In December 2023 a draft masterplan for a fraction of the overall 50-hectare site was released. This was delayed by approximately 6 months as it was due to be released in Summer 2023. This focused solely on the St. Joseph's area of the overall Colbert Quarter site. To date, no planning application has been submitted and the masterplan is still listed as a draft on the LDA and Colbert Quarter website. As part of the Limerick Chamber Strategic Development Pipeline (SDP) – planning submission for the site was due to begin in Quarter 4 of 2023.

It is hugely concerning that so much of the National Planning Framework in Limerick for housing and urban development and regeneration hinges on the Land Development Agency. The only homes to come on stream in the short term are homes bought from developers thus removing them from the potential pool of owner occupiers and buyers. So it is questionable whether this adds to the housing stock at all, considering these homes were already potentially being built regardless.

Furthermore, in March 2023 the LDA released their report on Relevant Public Land. It identified six sites in Limerick with the potential to deliver 3,440 to 4,600 homes.

More worrisome, is the identified land's ability to deliver homes in the short term. Just one of the six identified sites in Limerick are class 1. Class 1, as defined in the report is "less constrained and could be progressed for resident development in the near to medium term". Meanwhile, Colbert Quarter lands are "class 3", which are outlined to take 10+ years before they can be advanced due to their complexity.

Despite the Ervia / Gas Networks Ireland site being under "class 1" no planning application has been lodged at the time of writing. Ultimately, if the NPF is to fulfil its goal regarding infill and regeneration objectives with the provision of housing, there needs to be a review of LDA operations in Limerick and how these can be expedited with a renewed focus on the city to advance housing as quickly as possible.

However, we realise that it is not the sole responsibility of the LDA to deliver housing. But the figures are stark, on average Limerick completes c. 800 homes per year, whereas the Housing Commission report estimates we need 2,000 to 4,500 homes per year.



Fig 1.1 - Timeline of Colbert Quarter Implementation so Far



Fig 1.2 - LDA Relevant Lands Report, Potential Delivery

City	Number of Homes	Number of Lands
Dublin	26,070 - 35,130	38
Cork	11,810 - 16,080	14
Galway	4,330 - 6,050	8
Limerick	3,440 - 4,600	6
Waterford	870 - 1,220	4

Fig 1.3 - LDA Relevant Lands Report, Class 1 Sites

City	Number of "Class 1" Sites	Number of "Class 1" Homes
Dublin	10	3,830 - 5,160
Cork	3	870 - 1,230
Galway	2	300 - 420
Limerick	1	140 - 190
Waterford	2	120 - 170

Removed items from 2018 Key Growth Enablers for Limerick

The 2018 version of the NPF outlines the goal of “Complementary further development of the Limerick 2030 plan to include measures to encourage significant inner urban residential regeneration and development, to include the City’s Georgian Quarter”. Limerick Chamber believes that this should remain part of the key growth enablers for Limerick. It is not the sole responsibility of the 2030 plan to regenerate and develop the Georgian Quarter. There are national funding opportunities such as the living cities initiative which interact with this goal. Furthermore, given Limerick has the largest stock of Georgian properties outside Dublin, this importance should be reflected in the NPF to protect and re-utilise our built heritage.

Furthermore, plans for Limerick docks as part of the 2018 plan included “Extending the ambition of the Limerick 2030 plan to include extension of the City Centre towards Limerick Docks”. However, we believe that this is too important to the growth of Limerick to be left of the review. Furthermore, delivery has been poor to date. Under the review of the Limerick 2030 plan public realm for the docklands, as well as bridge improvements and a new pedestrian bridge were either due to be kicked off or implemented between 2022 and 2023. However, the world class waterfront project, despite receiving URDF grants, has not extended to the docks yet. This under deliver must be acknowledged as part of the review and action steps must be taken to ensure delivery.

Additions as part of the review for growth enablers for Limerick

Shannon Airport

We would like to see Shannon Airport listed as a key growth enabler for Limerick and the Mid-West. As a nation, we are playing catch-up on the infrastructure required for a growing population. As a nation, we are also struggling to match the goals of Project Ireland 2040 and the NPF, to delivery vehicles and policies. We believe that the growth of Shannon Airport is one such vehicle for regional and national growth. Despite the conversation regarding the cap at Dublin Airport, there is significant spare capacity within the state-owned aviation assets in Shannon and Cork.

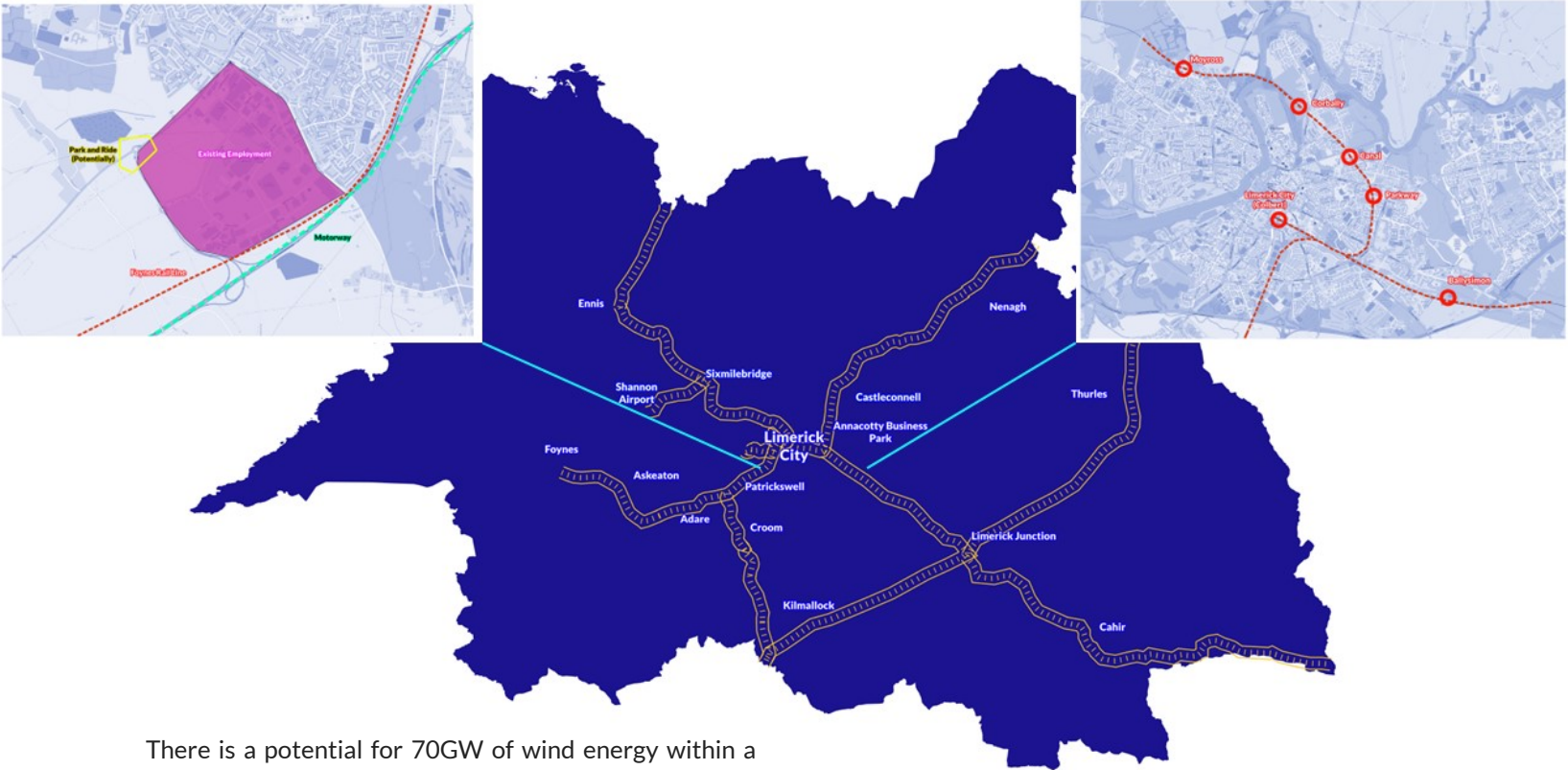
Shannon Airport can handle an additional 3 million passengers per year. It is estimated that Cork could handle an additional 2 million passengers per year. This is up to 5 million passengers that can be allocated to the regions to relieve the pressure on Dublin Airport and its supporting infrastructure.

There is a strong argument for national security, overfocusing the majority of our aviation passengers (88% per year) into one asset. It is shortsighted to not fully utilise Shannon Airport, considering 40% of passengers into Dublin are travelling elsewhere. Shannon Airport’s immediate catchment area contains 38% of the national population, meanwhile it accounts for just over 4% of Ireland’s Airport Traffic. Let’s also not forgot that Shannon / Limerick has the largest 90-minute catchment area outside Dublin. The airport is also seen by indigenous and MNC’s as a key growth enabler and reason for them locating in the Mid-West. Of course, there is also the case for sustainability, whereby people will be making shorter journeys to the airport, but also taking advantage of the embedded carbon already within the aviation infrastructure, rather than building more on the east coast.

The critical role of improved connectivity is essential for attracting businesses and facilitating trade in the region. Limerick Chamber welcomes the inclusion of the provision for a rail link from Limerick to Shannon Airport by 2030 in the All-Ireland Strategic Rail Review (July 2024) and this should be acted on by Government by way of support and funding to realise this connectivity and ensure it materialises by 2030. Improved transport links will boost the regional economy, allowing for more balanced growth outside of Dublin..

Shannon Foynes Port and the Estuary

Shannon Foynes Port Company is taking part in a very exciting journey, playing one of the key parts in Ireland’s traversal into the offshore renewable energy (ORE) space. Ireland’s Exclusive Economic Zone is approximately 7 times its land mass offering significant wind energy potential due to strong and consistent wind supply, particularly along the west coast. Due to the water depths in the region, the wind resource is most suited to floating offshore wind turbines, which are already being deployed rapidly in the UK, with Scotland awarding 15GW of leases in 2022. The technology is available now. Foynes Island and the Shannon Estuary possess unrivalled characteristics to become the supply chain hub for ORE on the west-coast.



There is a potential for 70GW of wind energy within a 36-hour tow time of Foynes’s Island. There are 400kV existing transmission lines from Foynes and Moneypoint to the East Coast. The channel depths are 32 metres, which is particularly important for floating offshore wind technology. There are many suitable locations for wet storage along the Shannon Estuary and the Foynes to Limerick rail line is currently being reinstated and is due to open in 2026. Furthermore, the Limerick to Foynes road is due to receive significant upgrades, making the port and region more accessible from a national perspective.

Again, like Shannon Airport, Shannon Foynes port can be a key piece of infrastructure and a lever to achieve the goals of Project Ireland 2040 and the NPF. The review of the NPF is a perfect opportunity to publicly back Shannon Foynes Port and the Shannon Estuary as the enabler for development of ORE on the west-coast, due to it’s unique characteristics. However, it must also be called out that the designated maritime area plan (DMAPS) for the west coast, must be expedited and implemented if we are to fully take advantage of this opportunity. It is concerning that DMAPS for the west coast is not mentioned in the NPF Review. We recommend calling out the critical step DMAPs for the west coast plays in harnessing energy from the Atlantic through Shannon Foynes Port. In this context, the NPF should outline a roadmap for a comprehensive DMAP that promotes the coexistence of offshore renewable energy with other marine activities, while also fostering the growth of the maritime economy along the Shannon Estuary.

Transport Oriented Development

Limerick and the Mid-West region are at a crucial stage in upgrading their transport infrastructure, with various projects offering the potential to adopt Transit-Oriented Development (TOD).

Key initiatives include the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), BusConnects, road upgrades like the N/M20 and N69, park-and-ride facilities, the Foynes rail line, and active travel schemes.

Collaboration between state agencies is essential to connect housing, employment, and transportation networks, particularly in areas like Raheen, which already meets many TOD criteria. This suburb benefits from major employment hubs, motorway access, proximity to a rail line, and services like Limerick BusConnects and park-and-ride facilities. However, additional housing for employees is needed, which could be developed through partnerships with the state or private sector. This TOD model could be replicated in other parts of Limerick, especially near rail lines, to optimise land use and reduce car dependency.

A key priority is leveraging Limerick’s existing rail network. Limerick Chamber advocates for Light Rail Transit (LRT) to reduce road congestion and meet future demand. While BusConnects is welcomed, LRT should also be prioritised, and we believe it should be listed as a key growth enabler for Limerick. Investing in dual-tracking and electrifying the existing rail line, particularly the Limerick-Foynes line, could transform regional transport. Only through support from policy documents such as the NPF, will TOD be adopted and implemented. While there is huge potential for this approach in Limerick, the joined up thinking to bring all the key parts together isn’t something that has happened just yet.

Population Targets

There are some methodological concerns which must be addressed as part of the consultation process and in advance of the final document being published.

Firstly, comparing minimum targeted population changes amongst the five cities between the 2018 NPF and the 2024 review (table 2.1). All cities have grown their minimum targeted population. However, there is a huge imbalance in that growth. Over 86% of the increase in city population is expected to be in Dublin. If this is the case, Limerick Chamber views it as going against the spirit and goals of the NPF.

However, there is also the issue of revising down the “% range” for the four cities outside Dublin. In the 2018 report, Dublin was set to grow at 20% to 25%, while the other four cities were 50% to 60%. This yields two different scenarios, scenario A looks at the lower growth end – 20% for Dublin and 50% for everywhere else. Meanwhile, scenario B looks at the higher rate of growth – 25% for Dublin and 60% for everywhere else. In the 2024 review of the NPF, it has the regional cities growing at a reduced “40%” – with no upper limit.

Under scenario A (table 2.1), comparing absolute minimums between the NPF in 2018 and 2024 outlines that all cities have increased their minimum targeted population by 2040. Albeit with Dublin accounting for 86% of the growth. Despite the “lower” rate of growth for the regional cities at “40%”.

However, it is the removal of the upper limit of growth, and that comparison, for the regional cities that is cause for concern in the 2024 review.

Scenario B (table 2.2) attempts to visualise the decrease this could result in for the regional cities comparing the “upper” growth limit of the 2018 plan with the flat growth of the 2024 plan.

While Limerick is not set to lose too much c. 400 people – other regional cities such as Cork and Galway are set to lose out substantially when the upper limit of 2018 is compared to the newer growth rate of the 2024 plan.

However, upon further inspection. It appears when comparing the 2022 population to the 2040 population (in the 2024 review) that the “% range” for the regional cities, is not a flat 40% applied across all the cities and there are differences (table 2.3). It is unclear why there is a difference amongst the cities and if the goal is the percentage growth of 40% or the minimum targeted population.

If Limerick is to grow to 150,000, then the 47% growth will be required, rather than the 40%. It is unclear which percentage target the NPF review is targeting.

Ultimately, given the current immigration levels in Ireland, it appears to be shortsighted as part of the NPF review to not apply an “upper” limit of growth. It is odd to see that Limerick under the 2018 plan upper limit, and the 2024 plan that ultimately the number of people expected to be in Limerick has fallen over that period. Again, giving business growth and large-scale immigration we don’t believe it is realistic that Limerick’s population expectation has not evolved and increased over the last four years.

While we realise that these are minimums and not ceilings, it is concerning. Primarily from a regional development point of view but also an infrastructure provision point of view. The concern from a Chamber point of view is that Limerick is not seen as growing from a national policy making perspective which may feed into other plans, particularly the National Development Plan and Budget. There is also the concern of the massive amounts of additional growth (comparing the 2018 plan to the 2024 plan) that is expected to take place in Dublin, rather than in the regions.



Table 2.1

	2018 NPF (Minimum Targetted Population by 2040) *Scenario A*	2024 NPF (Minimum Targetted Population by 2040)	Population Differences between 2018 & 2024 Versions	Growth Share
Dublin	1,408,000	1,560,000	+ 152,000	86%
Cork	314,000	320,000	+ 6,000	3%
Limerick	141,000	150,000	+ 9,000	5%
Galway	120,000	122,000	+ 2,000	1%
Waterford	81,000	88,000	+ 7,000	4%

Table 2.2

	2018 NPF (Minimum Targetted Population by 2040) *Scenario B*	2024 NPF (Minimum Targetted Population by 2040)	Population Differences between 2018 & 2024 Versions
Dublin	1,408,000	1,560,000	+93,750
Cork	314,000	320,000	- 14,400
Limerick	141,000	150,000	- 400
Galway	120,000	122,000	- 6,000
Waterford	81,000	88,000	+1,600

Table 2.3

	% Range 2022 - 2040	% Growth Required to Reach Minimum Target
Dublin	20 - 25%	24%
Cork	40%	43%
Limerick	40%	47%
Galway	40%	42%
Waterford	40%	47%

Dublin Population

The growth of Dublin, given the goals of the NPF, is extremely concerning. Under the 2018 NPF, the minimum targeted population for Dublin was 1.41 million by 2040. Just four short years later when the census was carried out in 2022, Dublin had already met, and exceeded, its potential growth - which was supposed to last until 2040. Reaching a population of 1.46 million.

Even more concerning is this issue appears to have been replication in the 2024 review of the NPF. April 2024 estimates of population in Dublin put it at 1.53 million people, meanwhile the minimum targeted population for Dublin under the 2024 plan is 1.56 million people. A mere difference of just 25,000 people. Again, this growth was due to take place up to 2040 - however, Dublin has reached its minimum target goals between 16 to 18 years early.

Furthermore, there is the growth in minimum targets between plans. From the 2018 plan to the 2024 plan, 176,000 people were added to the minimum targeted population for all cities. However, Dublin was responsible for 152,000 of these people. Resulting in 86% of the targeted population growth between plans being in Dublin.

The NPF review needs to be clear and concise in its plans for Dublin, the current process within the NPF will see Dublin's growth and dominance continue unbridled, and thus infrastructure investment and jobs growth will follow - at the expense of the regions. Dublin is already clearly under significant strain with its water supply, and the plan to pump water from the Shannon Basin, but also with the likes of key assets such as the airport. The NPF needs to adequately reflect the growth of the regions, clearly.

Employment Growth

Employment growth targets need to be reinstated as part of the NPF review. Table 2.1 in the 2018 NPF report includes targets for employment growth the Regional Assembly areas. Table 2.1 in the NPF review in 2024 includes no such targets. Without adequate employment opportunities, people will not locate in area, which means that if the NPF does not support targeted employment growth, it will be very difficult to encourage general population growth. These targets need to be reinstated and adequately reflect the growth ambitions of the regions.

Since 2018, areas outside Dublin - the Northern and Western Region and the Southern Region have been responsible for c. 49% of all jobs. With the Eastern and Midland Region (including Dublin) responsible for 51%. Dublin alone is responsible for c. 30% of all employment.

However, despite the NPF stating that 75% of growth should be outside Dublin, the share of employment creation is skewed. Consistently since 2018, Dublin has seen an allocation of 30% of the overall employment growth.

Dublin

1.41m

Target

(NPF 2018)

1.46m

Population

(Census 2022)

1.56m

Target

(NPF 2024)

1.53m

Population

(CSO 2024)

86% Share of Growth

(Between population targets in the 2018 and 2024 NPF)

56% Share of Growth

(Between Census 2016 and Census 2022, remaining 44% going to Cork, Limerick, Galway and Waterford)

Infrastructure

Cohesive Delivery

There must be better collaboration among the various providers responsible for delivering new servicing needs, such as roads, rail, access, and grid transmission. Currently, this collaboration is insufficient, but the NPF presents an opportunity to enhance the delivery and implementation of critical infrastructure needed to support further port development.

For example, NPO 101 aims to ensure that planning authorities and infrastructure delivery agencies prioritise the timely provision of enabling infrastructure to priority zoned lands. Limerick Chamber requests a similar focus for the timely delivery of enabling infrastructure to port facilities. We propose that a national policy objective be established to ensure that infrastructure delivery agencies consider port development and opportunities when formulating and implementing their capital investment plans.

A common trend amongst feedback from Limerick Chamber membership was the need for greater cohesion and communication across all infrastructure providers, from transport to utilities to housing etc. Therefore, there is merit in investigating the benefits of a regional infrastructure fora and how it can bridge this gap in helping to make infrastructure delivery more coordinated and streamlined.

Capital Investment

Limerick Chamber is worried about discrepancies between the geographic distribution of planned capital investment under the NDP and the NPF's goal of balanced regional growth. The growth targets for the Southern Region and the Limerick Metropolitan Areas cannot be met without an urgent rebalancing of the planned investment distribution. The NPF project will not succeed unless this issue is resolved. Therefore, the First Revision of the National Planning Framework should be significantly enhanced to recognise and address the misalignment between regional growth objectives and the structural and funding models necessary to achieve them.

Ports Infrastructure

Limerick Chamber welcomes the recognition in the Draft document that improved road connectivity to Shannon-Foynes Port, including local bypasses, is identified as a key driver of future growth for Limerick. As highlighted in our Shannon Airport section, connectivity is essential for economic development and business operations in the Mid-West. The Foynes-Limerick Road Improvement Scheme is crucial to the future development of the Port of Foynes. Its completion would generate substantial regional economic benefits, in addition to transport-related user advantages and employment opportunities during construction.

Limerick Chamber encourages further consideration of the role of ports in supporting Offshore Renewable Energy (ORE) projects within the Draft Revision of the NPF. Specifically, the operational benefits ports offer, such as reducing costs, minimising delays, and mitigating risks during the construction phase of ORE projects. This would, in turn, support the development of essential port infrastructure needed to facilitate future ORE initiatives.

National planning policy must clearly outline its approach and ambitions for expanding port infrastructure. While NPO 52 supports the development of port and harbour infrastructure, its focus seems limited to the development, maintenance, and operation of offshore renewable electricity generation projects. Although progress in ORE may be the main driver for new port infrastructure in the short to medium term, ongoing investment and development in port facilities will also be essential to accommodate organic growth in existing trade sectors and emerging trade in the unitised sector.



It is crucial to emphasise that a lack of investment in capacity, infrastructure, equipment, and connectivity poses significant risks to the future success of Ireland's ports and the national economy. Port infrastructure requires long-term planning and construction, and to address capacity constraints approaching 2040, policy decisions must be made now. Therefore, Limerick Chamber requests that NPO 52 be revised to support the sustainable development of all port and harbour infrastructure. Additionally, NPO 52 should be clarified in the final NPF review to ensure alignment with the hierarchical and tiered approach to port development outlined in the National Ports Policy.

NPO 51 aims to ensure that port development needs are addressed at regional and local levels. While this is welcomed, it falls short in adequately supporting and promoting the growth of Tier 1 Ports in particular. The importance of backing port policy at both national and regional levels cannot be overstated. Successful funding applications at the European level rely on demonstrated national support for specific projects. National support is also essential for tackling complex environmental challenges and establishing Imperative Reasons of Overriding Public Interest. Therefore, the need for additional port infrastructure must be clearly articulated in the NPF. To complement this, Limerick Chamber requests that the NPF specifically references major capital infrastructure programs underway in Tier 1 ports. While strategic plans for Tier 1 ports and city growth strategies should align with broader regional goals, the NPF should also recognise that adequate land zoning for port facilities and expansion must be planned beyond the typical six-year cycle, as the funding, planning, design, and construction of port infrastructure often extends beyond this period.

An Aviation Region

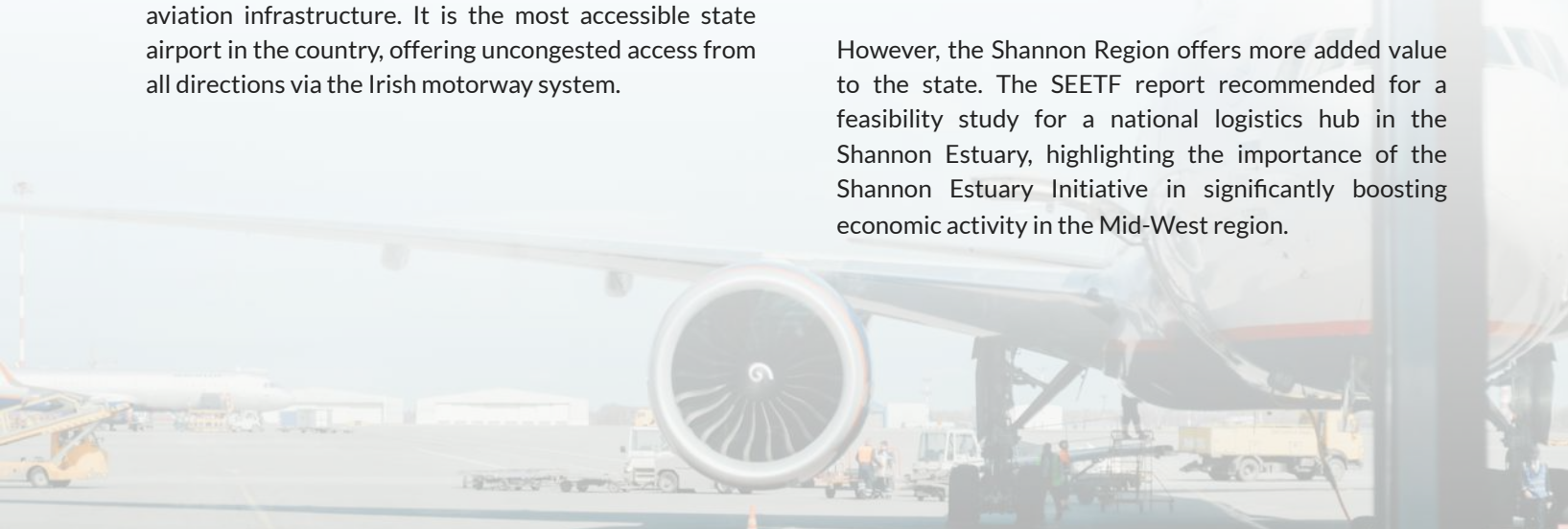
Shannon Airport is a critical component of Ireland's aviation infrastructure. It is the most accessible state airport in the country, offering uncongested access from all directions via the Irish motorway system.

Limerick Chamber welcomes the recognition of Shannon Airport as a key travel and enterprise hub in Section 3.4 of the NPF. However, there is an urgent need to address the current imbalance in air traffic, as Dublin Airport currently holds an 86% market share. As mentioned in early sections of our submission, given Shannon Airports underutilised capacity, its status as having the longest runway in Ireland capable of handling all types of aircraft, unrestricted operational capabilities both on the ground and in the air, and its US customs preclearance facilities, there is considerable potential for growth in the Mid-West and indeed nationally. This capability of customer preclearance fosters increased business collaboration between the U.S. and Ireland with wider collaboration international for companies that locate their EMEA headquarters here. For a regional airport, Shannon provides unparalleled access to transatlantic connections, typically found only at larger international airports.

Limerick Chamber recommends that the first revision to the NPF place a stronger emphasis on increasing flights at regional airports to foster regional development, enhance connectivity, and reduce dependency on Dublin Airport. Additionally, it is vital for the thriving business community in the Mid-West to support a route to a northern European hub that provides substantial onward connectivity.

Enhanced connectivity is vital for attracting businesses and facilitating trade in the Shannon region. The acknowledgment of connectivity's key role in NPF 2024 is welcomed, as is the inclusion of plans for a rail link from Limerick to Shannon Airport by 2030 in the All-Ireland Strategic Rail Review. However, further investment in transport infrastructure and utilities is necessary to support intensified development and balanced regional growth. These improvements will enhance the Mid-West region's attractiveness to both domestic and international businesses.

However, the Shannon Region offers more added value to the state. The SEETF report recommended for a feasibility study for a national logistics hub in the Shannon Estuary, highlighting the importance of the Shannon Estuary Initiative in significantly boosting economic activity in the Mid-West region.



Shannon Airport could leverage its proximity to the Estuary by offering sustainable fuel generated offshore to its aviation clients. Additionally, the surrounding Shannon Campus could also see establishment of organisations seeking to locate near their energy sources for cost and supply security reasons. The NPF should clearly outline support for such initiatives, as it is crucial for demonstrating and fostering balanced regional development. The NPF 2024 should explicitly acknowledge the strategic importance of the Shannon area within the Mid-West region, particularly Shannon Airport and the Shannon Campus, as key drivers of economic growth and regional development. This recognition, through the NPF, will help prioritise development in the regions.

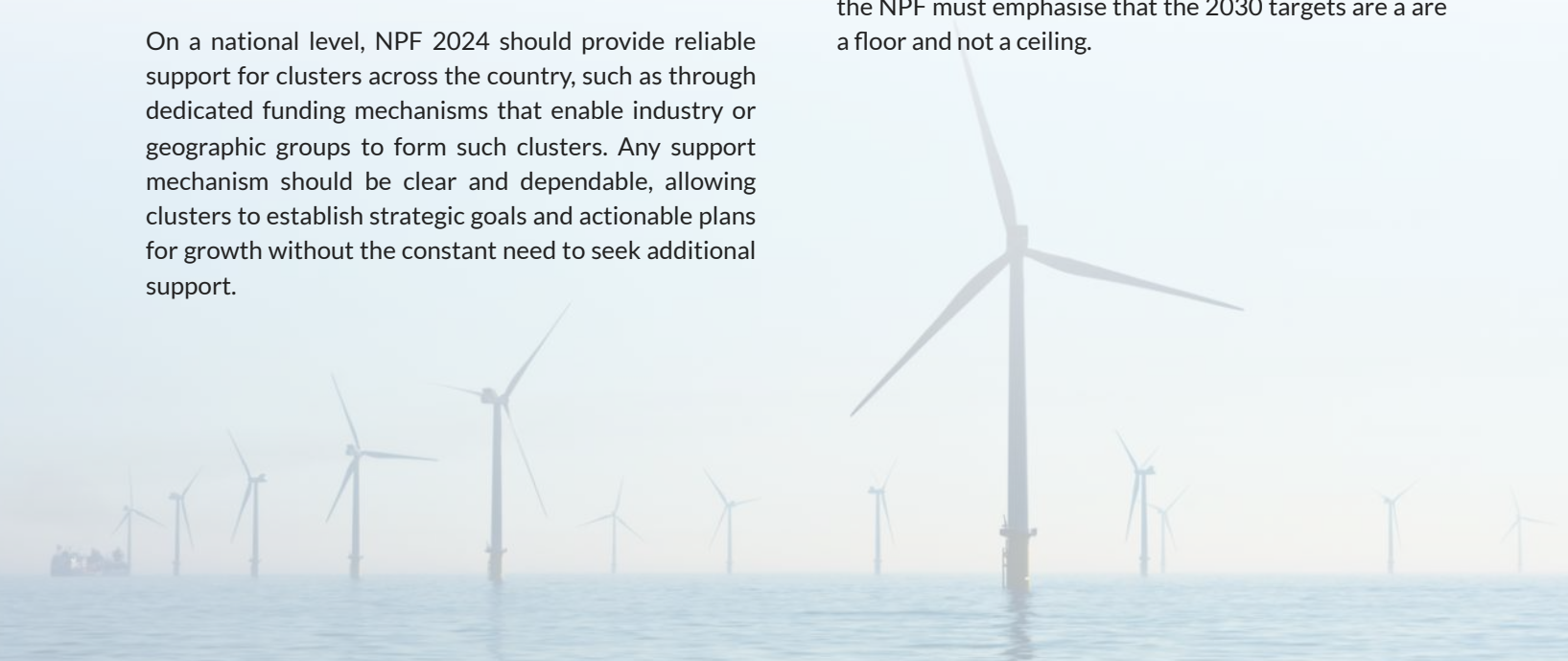
NPF 2024 should also recognise and promote Shannon's role as Ireland's primary aviation, aerospace, and innovation cluster. Support through policy and investment is needed to further develop aviation-linked economic activities and industries around Shannon Airport, such as logistics, aerospace, maintenance repair overhaul, hangar development, and tourism, along with emerging sectors like space. The aviation-led cluster at Shannon is globally focused, addressing all aspects of the aircraft lifecycle from research and development to manufacturing, financing, operations, maintenance, and airworthiness. Additionally, the multiplier effect of this cluster can be amplified by the increasing presence of future industries, including renewable energy, sustainable mobility, technology, and med-tech sectors, which can provide high-quality employment opportunities. Enhanced policy and investment support through NPF 2024 will help attract new companies to the region and foster synergies that enhance its economic vitality.

On a national level, NPF 2024 should provide reliable support for clusters across the country, such as through dedicated funding mechanisms that enable industry or geographic groups to form such clusters. Any support mechanism should be clear and dependable, allowing clusters to establish strategic goals and actionable plans for growth without the constant need to seek additional support.

Energy Skills, Research & Development Infrastructure

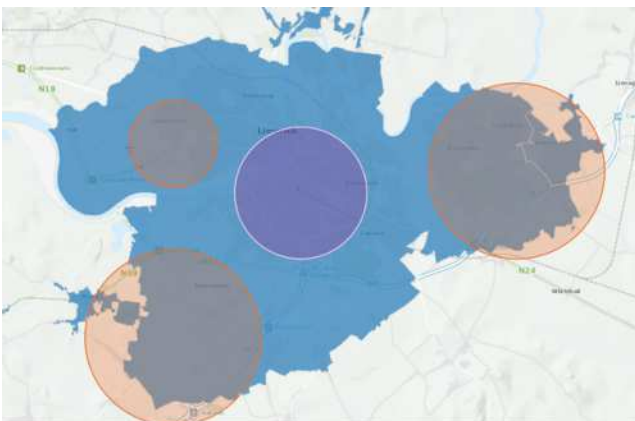
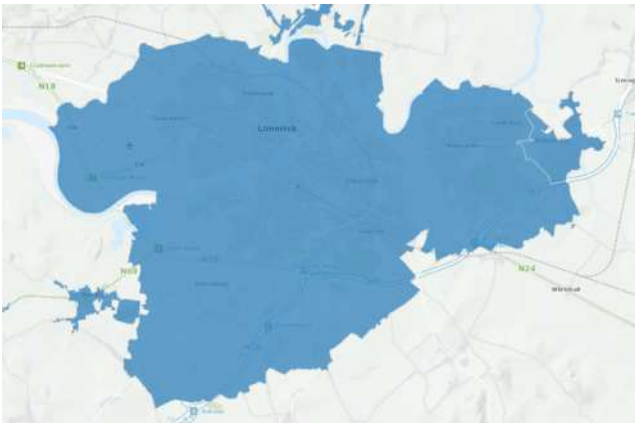
The report published by the Shannon Estuary Economic Taskforce's (SEETF) outlined recommendations to the government regarding the economic development potential of the Shannon Estuary region. The report confirms that the region can play a pivotal role in energy self-sufficiency and decarbonisation, not only for Ireland but also for Europe, while creating substantial economic opportunities. Central to this is the development of one of the world's largest renewable energy hubs, primarily driven by large-scale offshore wind energy from the Shannon Estuary. On a global scale, the Shannon Estuary's natural assets make it uniquely positioned for this role. The potential of the Shannon Estuary should be recognized as a key growth driver for Limerick, and it should be designated as a Centre of Excellence, combining research, development, education, and skills with offshore wind energy harvesting for widespread benefit.

Limerick Chamber is particularly concerned that the NPF references harnessing the renewable energy potential of the Southern region, in line with the capacity allocation targets outlined in Chapter 9.0. Chapter 9.0 specifically mentions the 5 GW offshore wind target by 2030. It is essential that the NPF clearly states that this 5 GW target does not preclude consideration of Offshore Renewable Energy (ORE) projects that may cumulatively exceed 5 GW before 2030. Furthermore, the NPF must explicitly confirm that there is no inherent restriction on ORE development along the west coast, both up to and beyond 2030. It should also be made clear that the 5 GW/7 GW targets are minimum goals, not maximum limits for planning decisions or for the formulation of DMAPs. In essence, the NPF must emphasise that the 2030 targets are a floor and not a ceiling.



Density

While we welcome the inclusion of a definition around built up areas and the boundary this covers. Limerick Chamber believes this to be too wide an area. The core concern being sprawl. Limerick, like many other cities, has suffered from the donut effect of planning in the past, where the city centre has seen a hollowing out with people choosing the suburbs. As outlined in the NPF Review, there is a target for at least 40% of new housing to be delivered within existing built up areas (BUA) of cities, towns and villages. The below is a map of the BUA for Limerick, to see just 40% of new homes delivered within this area will lead to significant sprawl. Although it is unclear if this is actually 50%, as this figure is referenced instead of the 40% in later sections. On the east of the city, the BUA spreads almost as far as Annacotty, in the West of the city it extends as far as Raheen Business Park, in the North of the city it extends passed Moyross and Coonagh.



In the past several decades, much of the residential development has taken place within the orange circles, primarily in the east and west of the city, with smaller pockets in the north. However, there is a distinct lack of residential development in the city centre. We highlighted this on our city centre report, whereby we found that just 4% of the housing stock in the city centre was built from 2011 onwards.

We urge that the NPF commits to a target for building residential developments within core city centres such as the purple circle. If the 40% moves ahead as is, it will see development continue in the orange areas causing further sprawl and hollowing out of the city centre. However, it also also a concern that just 40% of housing is targetted to take place within the BUA. This means that 60% could take place outside causing further sprawl and more car dependency.

However, density does not come without its challenges. Given the cost of developing apartments, they are not made available for purchase and are purchased from developers by approved housing bodies and local authorities in bulk. This distorts the market and freezes out owner occupiers. In Limerick, just 40% of new homes are purchased by owner occupiers. The state must offer greater support for those looking to own their own home in a higher density development. It needs to be approached from an investment perspective given high density developments are likely better for the environment through decreased transport requirements and ability to locate them on TOD nodes.

Developer Led Planning

While the NPF references a planning led approach to development. This is not always true, there are cohorts of the system that has been provided with a subvention to this rule. The current planning rules, sees IPAS accommodation not requiring planning permission for a change of use. This is concerning as these developments do not have to adhere to local development plans. Furthermore, the current structure sees Ireland going back to developer led planning, whereby a person can buy a building and enter into a contract with the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) with no consideration for the wider strategic goals or plans for an area. This must be ceased and a better plan needs to be put in place. It brings a profit driven motive to the development of our cities. If a building owner has the opportunity to enter into a very lucrative contract with the DCEDIY then there is no incentive to invest in the property for a commercial, education or long-term purpose and cities end up with "temporary" uses for very long-periods at a time. This must be rectified within the NPF.



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