

Submission on Statement of Strategy (DETE)

April 2025



**Limerick
Chamber**
Advancing business together

Limerick Chamber of Commerce

The Voice of Business in the Mid-West

Limerick Chamber of Commerce, established in 1805, is one of Ireland's oldest business representative bodies. It serves over 400 member organisations across sectors such as industry, trade, tourism, healthcare, education and professional services, positioning itself as the leading chamber in the Mid-West region. Limerick Chamber members support over 50,000 jobs across the Mid-West region. Limerick Chamber is one of the select few Chambers in Ireland with a dedicated policy and research unit that allows the Chamber a unique value proposition when lobbying for members.

1. Infrastructure & Regional Development



*Transport Connectivity
Housing & Urban Regeneration
Water and Utilities Infrastructure
Regional Airports & Ports*

2. Energy Transition & Renewable Prioritisation



*Accelerate Floating Offshore Wind Development
Resilient Energy Supply
Green Enterprise Opportunities*

3. Empowering Indigenous Businesses



*Capital Access
Regulatory Balance
Support for Scaling Businesses*

4. Cost of Doing Business



*New Funding Process for Commercial Rates & Levies
Visible Return on Investment for Businesses*

5. Shannon Estuary Economic Taskforce



Standalone strategic goal for implementation

6. Urban Approach



*Housing
Policing
Commercial Vacancy*

7. Tourism



*Marketing focus on regions
Rebalance Aviation for Tourists and Businesses*

Introduction



Firstly, Limerick Chamber would like to thank the Department of Enterprise, Trade and Employment (DETE) for the opportunity to submit our members views on Statement of Strategy 2025 - 2028.

This submission builds upon the extensive policy and advocacy work of Limerick Chamber, the leading business representative organisation in the Mid-West. Drawing on insights from the Chamber's existing priorities, it highlights critical areas for action to support balanced regional development, enhance Ireland's enterprise environment, and future-proof the national economy.

Limerick Chamber's work has consistently demonstrated that investment in infrastructure is fundamental to economic growth. Without tangible progress on key regional projects—including the Limerick-Foynes road, Limerick BusConnects, the M20 Cork-Limerick motorway, and upgrades to water infrastructure—Ireland risks undermining the competitiveness of its regions. Furthermore, to realise the ambitions of the National Planning Framework and sustain full employment, urgent investment is required in social infrastructure such as healthcare, housing, childcare, and educational facilities.

Energy security and the transition to renewables are central pillars of future economic resilience. Limerick Chamber has led calls for the acceleration of floating offshore wind development off Ireland's west coast, leveraging the Mid-West's natural advantage. Without immediate policy action to expedite marine planning and port infrastructure development, Ireland risks falling behind its European peers and missing climate and investment targets.

The resilience of Ireland's indigenous business sector has also emerged as a strategic imperative. Limerick Chamber has highlighted the urgent need for improved access to capital, regulatory reform, and targeted supports for scaling businesses. Building a robust domestic enterprise base will complement foreign direct investment, enhance economic sovereignty, and provide greater insulation against global shocks.

Furthermore, the cost of doing business must be urgently addressed. Businesses continue to face upward pressure from commercial rates and development levies, often without visible returns on investment. Policymakers must adopt a more transparent, balanced, and sustainable funding model for local government to support enterprise growth.

Lastly, an urban-centred approach to economic development is essential. Sustainable urban regeneration — through increased city centre living, improved public safety, and strategic planning — will be crucial to unlocking the full economic potential of cities like Limerick. Current policies around vacancy, policing, and planning exemptions must be reformed to ensure a coherent and long-term development vision.



Items for Consideration

Infrastructure & Regional Development

Over the last several years, the advancement of business and infrastructure have become inextricably linked. For businesses to continue to invest and grow, they need to see that their investment agenda is being matched by the investment agenda of the State. They also must see these plans move from planning to commencement stages. Without further advancement of infrastructure there can be very little advancement of the enterprise agenda. That means, calling out in the strategy, the need to support continued tangible action across housing, transport, improvement of social services such as healthcare and childcare, the improvement of water infrastructure and serviced sites.

Businesses must continue to see the return on investment they make in the state through taxes, development contributions and commercial rates, evidence which can often be lacking.

Without visible progress in infrastructure across the Mid-West, Ireland will fall short of delivering the ambitions for balanced regional growth and a secure economy, but will also fail to maintain full employment and strong regional economic development.

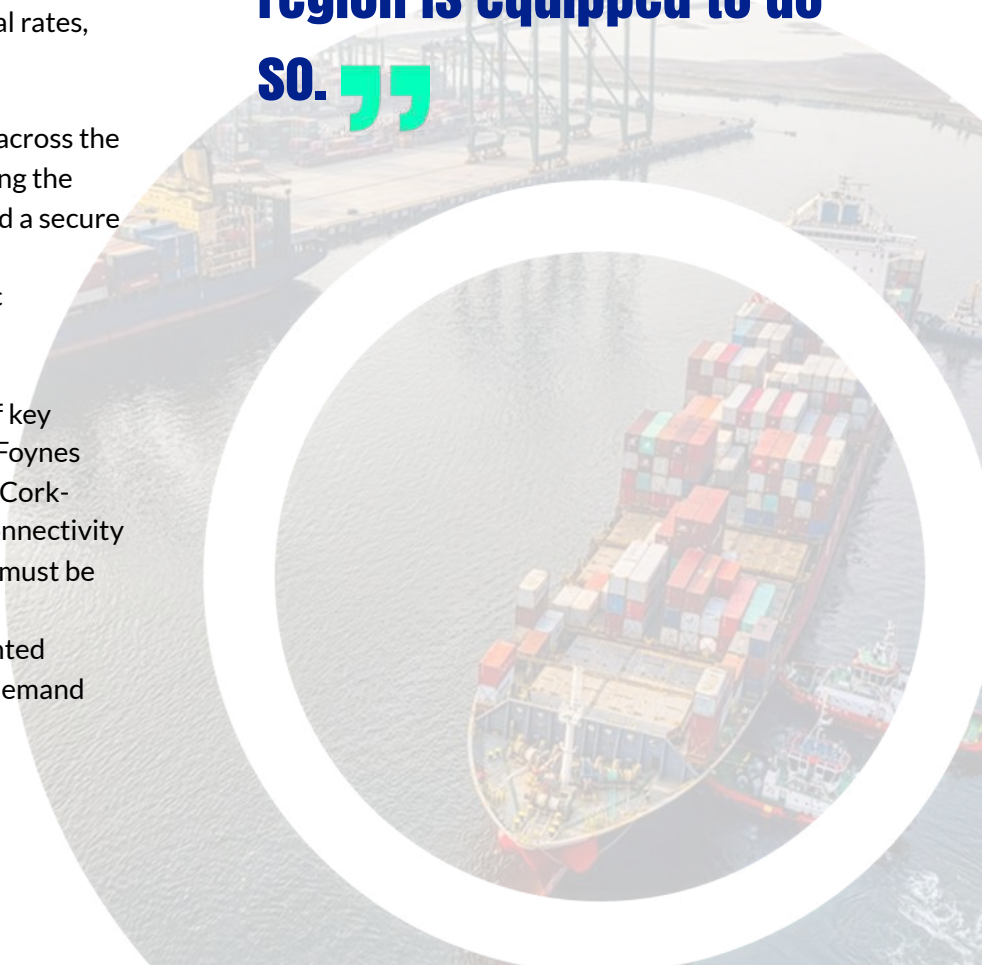
There needs to be a visible prioritisation of key transport projects such as the Limerick to Foynes Road, Limerick BusConnects and the M20 Cork-Limerick motorway to enhance regional connectivity and unlock trade capacity. Housing supply must be accelerated, particularly through targeted developments adhering to Transport Oriented Development principles to meet growing demand from workers and families.

Upgrades to the Shannon and Limerick water supply networks are equally urgent to support population growth and enterprise expansion. Investment in social infrastructure — including healthcare, education, and recreational facilities — must match our ambitions for balanced regional development.

Port and other logistics infrastructure is equally important to ensure that we can not only compete as a region, but can be part of the green transition.

Key state infrastructure like the airport, should be supported in the long-term through policy instruments like the Regional Airports Plan. This will allow the airport to become a level for balanced regional development.

“The Mid-West is ready to deliver for Ireland’s economy; it is now up to policymakers to ensure the region is equipped to do so.”



Energy Transition & Renewable Prioritisation

Limerick Chamber firmly believes that if Ireland is to advance the green agenda, meet its climate targets, safeguard energy security, and support sustainable economic growth, significant and immediate investment must be directed toward key areas of the energy sector.

Ireland must prioritise the acceleration of renewable energy projects, particularly floating offshore wind development off the west coast, where the Mid-West has a natural competitive advantage. Limerick Chamber sees expediting DMAPS for the west coast as an immediate need to boost confidence in the sector.

“The immediate advancement for a west coast DMAP is critical to instill confidence in the sector”

Ireland is beginning to lag behind our European neighbours when it comes to advancing renewable energy policy and transitional fuel policy (LNG).

To advance the business agenda, there must be security of supply, diversity of supply and a clear path to a renewable future - without such, Ireland will become unattractive to indigenous and international investment. Not only is there a need to advance the policy agenda with a focus on the west coast, but we need to continually invest in our port infrastructure to ensure that state-owned assets are adequately placed to take full advantage of the competitive advantage the region has.

However, not only is a stable supply and renewable energy important to the business sector, it is equally important to the state and should be treated as an enterprise opportunity, as well as climate and energy opportunities.

Without decisive action now, Ireland risks both its economic competitiveness and its ability to meet its 2030 and 2050 climate commitments. The Mid-West region stands ready to play a leading role in Ireland's energy future as one of the most naturally rich resource areas in Europe — but it requires targeted policy support and investment to do so.



Empowering Indigenous Businesses

The turbulence of the past several months—marked by rising tariffs, fractured supply chains, and geopolitical instability—has laid bare the vulnerabilities of economies that are overly dependent on international markets. For Ireland, a country rightly proud of its export achievements, this moment serves as a wake-up call: it is not enough to be an efficient platform for multinational exports. A strong, resilient indigenous business sector is now a strategic imperative, not only to maintain economic stability but to secure long-term national prosperity.

A vibrant domestic business sector strengthens economic sovereignty. When local enterprises are capable of meeting domestic demand for goods and services, Ireland is better insulated against external shocks—whether they come in the form of trade barriers, currency volatility, or shifting global alliances. Strong indigenous businesses also stimulate innovation, deepen supply chains, create high-quality employment, and ensure that more economic value is retained and recycled within the Irish economy. In contrast, overreliance on foreign direct investment (FDI)—while beneficial—carries the hidden risk of footloose capital, with decisions about Irish jobs and growth made far from Irish shores.

However, bolstering the domestic sector will require a renewed focus. It demands policy and incentives reform and investment focusing not just on those indigenous businesses exporting, but also businesses that facilitate solely the domestic market. Access to capital for Irish SMEs is critical, especially a competitive credit market; traditional banking channels can often be seen as risk-averse, and alternative funding models remain underdeveloped.



We must also examine if regulatory burdens disproportionately affect smaller enterprises and what can be done to streamline, allowing domestic businesses to scale more easily. There also needs to be an evidence-based approach to policy development, ensuring a full understanding of the impacts of business changes prior to implementation. Lastly, there needs to be targeted support for scaling businesses, those that wish to serve the international but also the domestic.

Often, too much emphasis is placed on creating startups, while not enough attention is given to helping established businesses scale sustainably—a crucial gap in Ireland's entrepreneurial pipeline.

If Ireland is serious about future-proofing its economy, it must reimagine domestic business support as a long-term strategic investment, not a secondary policy concern. Strengthening the indigenous sector will not diminish Ireland's global ambitions; it will enhance them, anchoring international success on a foundation of local strength. In a world growing more uncertain by the day, resilience at home is the ultimate competitive advantage.

Cost of Doing Business

Businesses are expected to perpetually absorb commercial rates increases, sometimes on an annual basis, even during periods of economic slowdown and uncertainty, creating a rigid financial strain for many companies. This can discourage inward investment in many localities especially where value for money is not immediately visible for businesses.

Compounding this challenge are development levies, substantial upfront charges demanded by councils on new construction, expansions, or refurbishments. While intended to fund necessary public infrastructure such as roads, water services, and public amenities, these levies can inflate project costs by tens or even hundreds of thousands of euros, deterring business growth and innovation - sometimes with the fees raised not being invested in the locality where they were generated. This fragmented system places an undue financial burden on the productive sector to fund public services, a model that is increasingly misaligned with the needs of a modern, competitive economy.

As a matter of priority, it is imperative that policymakers consider alternative funding approaches that balance the need for local government financing with the sustainability of the business environment. Options could include a broader-based funding model that leverages multiple revenue streams rather than disproportionately taxing commercial activity.

A modern economy demands a modern funding model – it's time to align local authority financing with sustainable business growth

Furthermore, reforms should aim to decouple local authority revenue from volatile property valuations, introduce greater transparency and accountability in how levies are assessed and spent, and offer reliefs or scaling mechanisms that reflect a business's capacity to pay. There should also be a clear investment path for businesses, who pay commercial rates and development levies, to use the funds generated to invest in the communities in which they reside, to ensure that the benefit of the businesses is easily observable to the local community.

Without urgent action, Ireland risks undermining its reputation as an attractive destination for enterprise, innovation, and investment.



Shannon Estuary Economic Taskforce (SEETF)

The Shannon Estuary represents one of Ireland's most compelling opportunities for regional economic transformation. As outlined in the Shannon Estuary Economic Taskforce Report (July 2023), the region is uniquely positioned to become a national hub for sustainable energy development, industrial innovation, enhanced transport connectivity, and tourism expansion.

This initiative is more than a regional project—it is a national imperative. With its strategic location and natural advantages, the Estuary can directly support Ireland's decarbonisation targets while delivering high-value employment, economic diversification, and long-term resilience outside of the capital.

To realise this potential, strong policy alignment and robust financial backing from Government are essential. The Government has rightly recognised the importance of the Taskforce's recommendations, especially in relation to renewable energy and spatial planning. However, recognition must now be matched with action.

The next Statement of Strategy (2025–2028) from the Department must elevate the Shannon Estuary initiative as a standalone strategic goal. This would demonstrate clear commitment to:

- Advancing a balanced regional development agenda under Project Ireland 2040
- Accelerating innovation in green energy and infrastructure
- Delivering real, measurable impact through targeted investment

The Shannon Estuary is not a future opportunity—it is a current priority. Making it a central focus of national strategy will be a defining step toward a more sustainable, equitable, and forward-looking Irish economy.



“The Shannon Estuary Economic Taskforce Report sets out how Government and industry can work together for the benefit of the Shannon Estuary Region, the country and Europe.”

Leo Varadkar, July 2023

Urban Approach

As the DETE shapes its strategy, adopting an urban-focused approach is essential to align with existing government policies such as the National Planning Framework (NPF). The NPF emphasises sustainable development through increased densification of cities and towns, aiming to create compact, vibrant urban environments that can support economic growth, innovation, and quality employment. By focusing on urban areas, the Department can leverage the benefits of clustering enterprises, enhancing infrastructure, and attracting a skilled workforce, all while promoting balanced regional development. This approach also supports the government's broader goals of reducing carbon emissions, maximising public transport investment, and creating resilient, future-proof communities. Prioritising urban strategies ensures that enterprise and employment initiatives are not only aligned with national spatial planning objectives but also contribute meaningfully to a more competitive, sustainable economy.

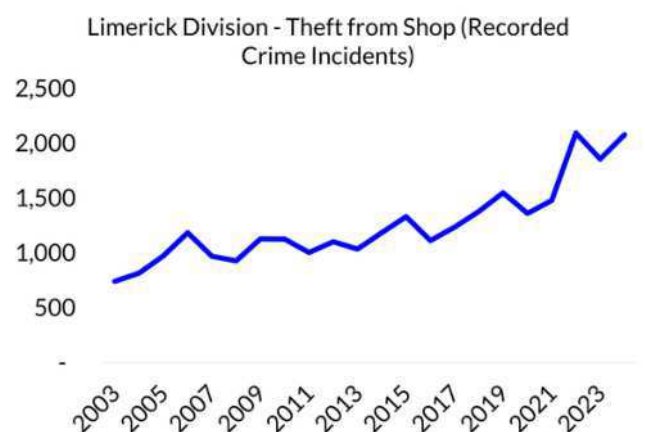
However, developing cities, in the existing policy context is not without its challenges. These challenges not only impact potential future businesses, but also are majorly impacting existing businesses.

Housing

For example, the provision of market and affordable housing in city centres is key, however, to date, taking Limerick as an example, we have failed to attract developers in this space, and the state, through the Land Development Agency, is moving slowly. To boost all-day footfall in town and city centres, there needs to be an increased drive to provide people with adequate living arrangements in the area.

Policing

Furthermore, there is also the issue with the justice system and policing. Customer facing businesses and businesses that rely on footfall find lack of on the beat visible policing a particular challenge. Combined with this are the increase in crime rates in some areas, for example latest crime statistics from the CSO outlined that "theft from shop" continues on a significant upward trend, increasing by 181% since 2003. Any enterprise strategy must address this issue as it results in a significant loss of time for businesses, loss of revenue and concerns around employee retention and safety.



Source: Central Statistics Office (CSO)

Vacancy

Lastly, while Local Development Plans seeks to address challenges and opportunities with input from stakeholders, current exemptions for IPAS (International Protection Accommodation Services) allow vacant commercial buildings to be converted without following normal planning processes. This has attracted opportunistic investors who profit from government contracts while ignoring local infrastructure needs and undermining strategic plans. By bypassing proper planning, this developer-led approach threatens sustainable, long-term growth. The current policy fuels this trend. Immediate reform is needed to incentivise long-term, mixed-use housing and commercial development over short-term profiteering.



“The decision to integrate tourism into DETE is a welcome and strategic move that rightly positions tourism as a core pillar of economic policy”

Tourism

The movement of tourism to within DETE is a most welcome move. The new DETE strategy should ensure future funding should be strategically directed to areas that deliver not only return on investment but also fosters inclusive and balanced regional development.

Tourism is not a peripheral sector—it is a powerhouse of employment and economic activity rivalling some of our largest sectors. Crucially, tourism is a regional economic engine, with 70% of visitor spending and 70% of tourism employment taking place outside of the Dublin area. Yet, despite this regional strength, the current overconcentration of air access through Dublin Airport - handling almost 85% of all air passenger traffic - undermines the tourism potential of the West and South. Approximately 40% of international visitors landing in Dublin Airport are destined for the West, resulting in unnecessary, inefficient travel, diminished visitor experiences, and intensified congestion in the capital.

This imbalance must be addressed. A reorientation of tourism policy is needed - one that actively supports direct regional access. Marketing efforts by Tourism Ireland are essential, but they must go further. Marketing resources should be appropriately redirected to promote and support air routes into Ireland's regional airports, which serve as critical gateways for growth, particularly in the Mid-West and Western regions.

DETE's 2025 - 2028 strategy must increase tourism funding to drive direct international air connectivity into Ireland's regions. The economic impact of additional flights into regional airports far surpasses that of adding more routes to Dublin. In line with Project Ireland 2040, marketing campaigns that promote regional gateways to the west are critical to the success of regional tourism.

Increasing direct air access to the West will extend visitor stays, boost spend in regional communities, and stimulate growth across key sectors—transport, hospitality, food, retail, and more. The benefits are wide-reaching and well-evidenced.

This is a strategic opportunity that must not be missed.



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