

# NATIONAL DEVELOPMENT PLAN

*Limerick Chamber  
Submission to the  
Review of the NDP 2025*



**Limerick  
Chamber**  
Advancing business together



# **Limerick Chamber of Commerce**

## ***The Voice of Business in the Mid-West***

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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.

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## **About our Submission on the NDP**

This submission from Limerick Chamber supports the NDP review in a number of ways. Firstly, it provides the perspective on capital provision from a diverse range of organisations from across the three counties making up the Mid-West. Secondly, it aims to address the gaps present in previous versions of the NDP. While previous iterations of the NDP have tried to address certain transport, health and justice infrastructural gaps, it does not go far enough to deal with the current population of the Mid-West and what is currently missing from the project pipeline and it failed to deliver a holistic and cohesive strategy for infrastructure provision across the Mid-West. This submission provides a wider encompassing approach to what is needed to address current challenges across the entire region from housing, water, energy, transport, justice, healthcare and indeed the city centre.

## 1. Housing



*Land Development Agency  
Zoned Land  
Croí Conaithe & Density  
Living Cities Initiative*

## 2. Water



*Irish Water  
Temporary Water Treatment & Supports*

## 3. Energy



*Offshore Renewable Energy  
Liquefied Natural Gas*

## 4. Transport



*Metropolitan Rail  
Airports  
Ports  
Road Network*

## 5. Justice



*Increasing Prison Capacity*

## 6. Other Sectors



*City Centre  
Health*

# Summary

Ireland’s failure to deliver essential infrastructure is undermining our national and regional competitiveness and holding back economic development across the country. Inadequate housing and transport remain the defining weaknesses of the last decade and the NDP must bring forward solutions to these issues, amongst others.

While we appreciate the focus of the NDP reviews is to boosting housing capacity, we must not let one issue stop Ireland from addressing challenges in other areas such as energy and healthcare.

This gap is starkly evident when comparing Ireland’s economic strength to its basic infrastructure ranking. Despite projected GDP growth of 3.7% in 2025, the European Commission’s 2025 Country Report places Ireland just 38th for basic infrastructure. This imbalance is unsustainable – and as our population expands, the consequences will only deepen if we do not act.

Simply put, if we don’t deliver we leave Ireland at a disadvantage compared to EU and global counterparts.

Area	No.	Project Name	Detail
Housing	MWDA-1	LDA	LDA projects must be included in the NDP to ensure that they are adequately supported for delivery while ensuring accountability for progress and completion
Housing	MWDA-2	Zoned Land	The NDP review should seek to zone more land in areas where delivery is possible, particularly in areas that are serviced
Housing	MWDA-3	Croí Conaithe & Density	The NDP should commit to reviewing density guidelines in Limerick and smaller cities as well as deploying a scaled down Croí Conaithe for smaller apartment developments
Housing	MWDA-4	Living Cities Initiative	Bring forward changes to the LCI to ensure wider impact
Housing	MWDA-5	Equalisation of Targets	The NDP must bring parity between targets for social and affordable homes
Water	MWDA-6	Irish Water Investment	Fund Irish Water to a sufficient level to overcome delivery issues and streamline connections for developers to reduce delivery times and costs
Water	MWDA-7	Temporary Water Treatment	Allow builders to construct temporary wastewater treatment plants
Water	MWDA-8	Uisce Éireann Rebate	Reintroduce the Uisce Éireann rebate on a timed basis to help encourage building
Energy	MWDA-9	Offshore Renewable Energy	The national DMAP process must take account of existing on land infrastructure, and the NDP must outline the Shannon Estuary as a priority site and allocate funding based on geographic priority
Energy	MWDA-10	LNG	The NDP needs to explicitly recognise the necessity of an LNG solution as part of a resilient energy mix

Infrastructure delivery cannot continue to lag behind ambition. Without immediate action, clear accountability, and a unified national commitment, Project Ireland 2040 risks becoming a catalogue of broken promises instead of a blueprint for progress.

The message is clear:

**Delivery must be urgent.**

**Accountability must be built in.**

**There is no room for delay or complacency.**

As the NDP is reviewed, its success must be judged on two simple but vital principles: Delivery and accountability.

The NDP must focus on delivery across many areas; transport, energy, water, housing, justice, healthcare and our city centres. In our submission we propose 20 Mid-West Development Actions (MWDA) to counteract these challenges across our region, a summary of which is provided underneath.

Area	No.	Project Name	Detail
Transport	MWDA-11	Metropolitan Rail	The NDP must support plans for developing a metropolitan rail system in Limerick, including dual tracking to Limerick Junction
Transport & Energy	MWDA-12	Airport Investment	The NDP must make a commitment for the long-term inclusion of Shannon Airport in the RAP
Transport	MWDA-13	Port Investment	The NDP must ensure the support of timely development and capital investment in essential port infrastructure at Shannon Foynes Port
Transport	MWDA-14	N21 / N69 Limerick to Foynes Road	The NDP must allocate the necessary funding for the remainder of the N21 / N69
Transport	MWDA-15	N / M20 Cork to Limerick Road	The NDP must to acknowledge the importance and prioritise the approval and funding process for the N / M20
Transport	MWDA-16	LNDR Phase 1	Fund the necessary safety and connection improvements at the Mackey roundabout, as well as PnR facilities
Transport	MWDA-17	Limerick BusConnects	The NDP must support and accelerate investment in Limerick BusConnects
Justice	MWDA-18	Prison Capacity	Commit to increasing the national and local prison capacity
Other	MWDA-19	Healthcare Capacity	The NDP must bring forward a capital investment programme and strategy for city centres
Other	MWDA-20	City Centre Funding	The NDP must commit to boosting hospital capacity across the Mid-West, particularly A&E and Maternity

# Housing

## Land Development Agency (LDA)

Limerick Chamber fully supports the LDA and their mission to deliver affordable homes throughout Ireland. Unfortunately, the direct delivery of homes by the LDA in Limerick to date has been extremely poor - delivering zero direct homes (excluding purchasing homes from developers).

The pace of site development in Limerick is wholly unacceptable. Despite the LDA announcing plans for the Colbert Quarter back in 2019, no planning submission has been made to date – nearly six years later. Meanwhile, the estimated start date for works at the Gas Works site has been delayed until 2027. Similarly, the joint project by the LDA and Limerick City and County Council for Phase 1 in Mungret Park (formerly under the remit of Limerick Twenty Thirty) has yet to begin construction, with the estimated start now pushed to Q4 2024.

MWDA-1	LDA projects must be included in the NDP to ensure that they are adequately supported for delivery while ensuring accountability for progress and completion
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## Zoned Land

As per the Housing Commission Report *"ensure that there is an appropriate level of reserve of zoned serviced land ('headroom') to deliver the housing requirements and to minimise the inherent dangers arising from restrictions of supply of an essential commodity."*

MWDA-2	The NDP review should seek to zone more land in areas where delivery is possible, particularly in areas that are serviced
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## Housing Density

The cost and feasibility challenges surrounding apartment and high-density developments have been extensively analysed and documented. Cities like Limerick, along with other smaller regional centres, face a distinct set of obstacles. Not only is there a significant viability gap in delivering apartments, but there is also limited appetite for constructing dense housing projects at scale, particularly for home ownership.

This issue is compounded by insufficient support from central Government for the construction of apartments and high-density developments in regional cities. This is evident from the fact that all developments listed on the Croí Conaithe Cities website are concentrated in Dublin and, to a lesser extent, Cork. The strict criteria of the current Croí Conaithe Cities scheme—which requires developments to have a minimum of four storeys, a density of 35 dwellings per hectare, and at least 20 units—are unrealistic in Limerick and other smaller cities. The NDP should explore the introduction a scaled-down version of the Croí Conaithe Cities scheme for smaller cities like Limerick. This revised approach could relax density and development requirements, enabling builders and developers to pursue smaller apartment projects. Additionally, providing developers with confirmation of Croí Conaithe eligibility before submitting planning applications would help mitigate the financial and logistical risks associated with the process.

The lack of apartment construction in Limerick and similar cities raises broader questions about the appropriateness of current density guidelines. While developers are obligated to adhere to these density standards, rising costs often mean the land might be better utilised for other forms of housing to ensure a more appropriate tenure mix. To address this, the NDP should prioritise a comprehensive review of density guidelines for Limerick and smaller cities to align them with local economic and social realities.

MWDA-3	The NDP should commit to reviewing density guidelines in Limerick and smaller cities as well as deploying a scaled down Croí Conaithe for smaller apartment developments
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## Living Cities Initiative (LCI)

The Living Cities Initiative (LCI) can transform Limerick and other cities by bringing old homes back to life. However, uptake remains disappointingly low. While Limerick Chamber welcomes past improvements, further changes are needed for the LCI to reach its full potential – with a clear focus on owner-occupiers.

### Key issues and solutions:

- Expand eligibility: Raise the cutoff from pre-1915 to pre-1919 initially, and ideally to pre-1945 – increasing eligible homes in Limerick’s Special Regeneration Areas (SRAs) from ~180 to over 730.
- Increase relief: Lift the annual owner-occupier claim from 15% to 20% to reflect inflation and boost affordability.
- Bring relief forward: Allow tax relief to be claimed when renovation begins – not just after moving in – to ease upfront costs. A residency requirement or clawback can prevent misuse.
- Allow transfer: Permit unused relief to transfer to new owners if the first owner has lived in the home for a set time. This supports property sales and mobility.
- Include extensions: Allow relief for new, non-essential extensions on qualifying properties – at a lower rate (7.5% per annum) with a sensible cap.
- Combine supports: Amend rules so SEAI and other sustainability grants can be used alongside the LCI.
- Enable staged works: Allow owner-occupiers to claim LCI relief more than once for phased renovations within a clear timeframe.
- Prioritise owner-occupiers: Ensure LCI homes are genuinely lived in – with exceptions only for dedicated long-term affordable rentals.
- Address high insurance costs: Make insurance premiums on renovated older homes eligible for relief during the qualifying period.
- Empower HBFI or local authorities to fund purchase plus renovation.

- Expand the “First Home” shared equity model to help bridge valuation gaps.
- Enable mortgages for mixed-use buildings and allow relief on the commercial portion if the owner lives there – supporting “living above the shop”.
- Make it user-friendly: Fund local authorities to set up LCI one-stop shops for advice, paperwork help, and local promotion.
- Expand SRAs: Broaden regeneration zones to cover more viable housing stock in cities like Limerick.

The LCI is a smart, once-off boost for city centre renewal – but only if modernised and targeted properly. These practical changes will unlock more renovations, support sustainable urban living, and help Limerick reach its housing and regeneration goals.

MWDA-4	Bring forward changes to the LCI to ensure wider impact
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## Equalisation of Targets

National targets have a large influence on local and regional targets. There needs to be equalisation of affordable homes to an equal playing field of social homes. For example, as part of Housing for All, the yearly Housing Need Demand Assessment targeted 31.5% of output for social housing, meanwhile just 12.5% was targeted for affordable - the targets for social housing are 2.5 times greater than affordable. Over the lifetime of the plan, Government aimed to deliver 90,000 social homes (29% of total homes), but just 54,000 affordable homes (17% of total homes).

MWDA-5	The NDP must bring parity between targets for social and affordable homes
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# Water

Housing delivery is rightly at the heart of Ireland’s NDP and of national economic and social priorities. As the business community in the Mid-West has consistently highlighted, the availability of quality, affordable and private homes is essential to attracting and retaining talent, enabling balanced regional growth, and maintaining competitiveness.

However, one of the most persistent and preventable constraints on new housing supply is the inadequate capacity and aging condition of our water and wastewater infrastructure. This reality has been highlighted repeatedly by many state and industry representative bodies. Across Limerick and the wider region, developers continue to face planning and delivery delays because vital water services infrastructure is either at capacity or requires substantial upgrades to meet modern standards.

For the Mid-West, timely and strategic water investment is critical not only to unlocking zoned land for much-needed housing but also to enabling the delivery of mixed-use urban regeneration projects, attracting new employers, and delivering key regional growth centres such as Limerick City.

From a business and community perspective, underinvestment in water services carries significant hidden costs: it constrains supply, inflates construction timelines and costs, exacerbates affordability challenges, and undermines confidence among domestic and international investors.

## Irish Water

To support the ambitions of the NDP and to realise the full potential of the Limerick-Shannon Metropolitan Area as an engine of growth for the region and the country, Limerick Chamber calls for a clear, ring-fenced, and front-loaded programme of water and wastewater infrastructure investment.

MWDA-6	Fund Irish Water to a sufficient level to overcome the issue and streamline connections for developers to reduce delivery times and costs
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## Temporary Water Treatment & Supports

There are measures that can be taken in the interim while Irish Water invest in building up capacity to deliver projects. The developer / builder should be permitted to construct a temporary treatment plant for water, provided the main plant in the area is at maximum capacity but will receive an upgrade within five years. Importantly, the costs of installation and maintenance of the temporary plant should be covered by the Government / Irish Water.

MDWA-7	Allow builders to construct temporary wastewater treatment plants
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There are numerous reports from SME builders where the cost of a water connection is prohibitive to the delivery of housing, particularly in county towns. Limerick Chamber recommends reintroducing the temporary refund scheme / the Uisce Éireann rebate on a timed basis to encourage home building in these areas.

MDWA-8	Reintroduce Uisce Éireann rebate to help SME builders with connections
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# Energy

## Offshore Renewable Energy

Limerick Chamber welcomes the Government's commitment to delivering a national Designated Marine Area Plan (DMAP) by the end of 2027. Delivery by 2027 is critical to the future of the sector.

It is vital that the DMAP's offshore site assessments fully consider the importance of critical onshore support infrastructure—particularly sheltered deepwater ports and robust grid connections, such as those available at Shannon Foynes. Focusing solely on offshore zones without integrating these indispensable onshore assets could jeopardise the overall viability of offshore energy projects.

Additionally, there remains uncertainty over whether future Ports Policy will adequately provide for the funding needed to deliver this integrated approach. To ensure the DMAP is completed on schedule by 2027, strong Government backing is required, along with a dedicated budget—estimated at roughly €50 million—secured through the National Development Plan review. This funding must be sufficient to cover the assessment and planning of key land-based infrastructure alongside the marine elements.

Without this targeted support and investment, the goal of finalising the DMAP by 2027 could be at risk, threatening progress on broader national priorities such as energy security, decarbonisation, and economic competitiveness.

Current strategic investment priorities for ports and offshore renewable energy (ORE) are addressed in Chapter 11, High-Quality International Connectivity and Chapter 13, Transition to a Climate-Neutral and Climate-Resilient Society of the National Development Plan. Chapter 11 highlights Ireland's three Tier 1 ports—including Shannon Foynes—and

and confirms that improving access routes through ongoing investment is a government priority. It also recognises the vital role ports play in supporting ORE development. Chapter 13 underlines Ireland's significant ORE potential as central to national decarbonisation and energy security goals. It acknowledges that major investment in port infrastructure is crucial for installing, maintaining, and supplying offshore wind projects. It also notes that planning and policy frameworks are being updated to align port capacity with future sector needs.

Nevertheless, the NDP currently lacks clear detail on the geographic priorities, funding mechanisms, and timelines needed to deliver integrated port development and ORE infrastructure. Without defined investment pathways and targeted capital commitments, there is a real risk that necessary port expansions and ORE projects will face delays or fail to attract private investment confidence.

To fully realise the strategic aims of Project Ireland 2040 more specific funding commitments—clearly linked to locations and coordinated sector plans—are urgently needed to ensure that port capacity and ORE infrastructure are delivered efficiently and on time.

Lastly, there appears to be a wrongly accepted viewpoint in Ireland currently regarding floating technology not being "fully developed" yet, this is untrue and the NDP needs to recognise this reality as other countries are already developing sites.

### International Progress

If we don't act swiftly, we risk losing our competitive edge to other European countries. France has awarded tenders for its 250MW Pennavel project, while Portugal's WindFloat Atlantic has delivered 25MW since 2020. Norway already operates 88MW at Hywind Tampen and is expanding with 1.5GW approved at Utsira Nord. Spain has committed €200million to new testing and port infrastructure, and the UK leads with plans for up to 4.5GW in the Celtic Sea. France, Norway, Portugal, and Spain are advancing rapidly, yet Ireland still has no operational pilot or demo-scale projects.

MWDA-9	The national DMAP process must take account of existing on land infrastructure, and the NDP must outline the Shannon Estuary as a priority site and allocate funding based on geographic priority
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## Liquefied Natural Gas (LNG)

A secure, affordable, and resilient energy supply is fundamental to the success of Ireland’s National Development Plan (NDP) and the broader ambition to deliver balanced regional growth, energy security and competitiveness. As Limerick Chamber has consistently highlighted in its policy submissions and regional economic analyses, Ireland and the Mid-West’s capacity to attract and retain investment is intrinsically linked to the reliability of its energy infrastructure.

Ireland remains uniquely exposed in an EU context as a peripheral island economy with an overwhelming reliance on a single gas pipeline from the UK. This vulnerability has been underscored in recent years by geopolitical instability, global energy market volatility, and the imperative to transition from high-carbon fuels. While the expansion of renewable energy sources—particularly offshore wind—is rightly at the core of our decarbonisation strategy, it is equally clear that an interim, flexible, and secure backup supply is necessary to manage periods of low renewable generation and peak demand.

To date much of the infrastructure being delivered has been solely focused on emergency generation rather than a steady supply.

In this regard, LNG has a critical bridging role to play. As recognised by a range of organisations, an LNG terminal would diversify Ireland’s energy supply routes, reduce overdependence on existing supply chains, and improve our resilience to supply shocks.

Crucially, it would enable the Mid-West and Western regions to future-proof investment in strategic infrastructure and support energy-intensive sectors that underpin employment and regional prosperity.

Furthermore, an LNG facility—appropriately regulated and developed to the highest environmental standards—can be aligned with our long-term decarbonisation pathway. Modern LNG infrastructure can be designed for transition to green gases, such as renewable hydrogen, as technology and market readiness mature. Thus, an LNG terminal is not a contradiction of climate ambition but a pragmatic enabler of a secure transition that protects jobs and competitiveness during the period when the national grid still requires firm dispatchable power.

In the context of the NDP Review 2025, it is vital that the Government ensures that energy security is treated as a cornerstone of balanced regional development. Investment in diversified energy infrastructure, including LNG, must be integrated into the wider strategic pipeline of projects to guarantee that communities and enterprises in regions such as the Mid-West are not disadvantaged by supply constraints or price volatility.

Aligning Ireland's position on LNG with the EU view on LNG is important to not only the energy security of Ireland but also the wider EU.

MWDA-10	The NDP needs to explicitly recognise the necessity of an LNG solution as part of a resilient energy mix
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# Transport

## Metropolitan Rail Network

The National Development Plan should commit to enhancing the regional rail network through investing in a commuter rail system for the Limerick and Shannon Metropolitan Area and also dual tracking the line from Limerick Colbert to Limerick Junction.

As outlined in the Limerick-Shannon Metropolitan Area Transport Study (LSMATS) *"It is the intention of the NTA, Iarnród Éireann and both local authorities to work in collaboration to provide a dual-track between Limerick Colbert and Limerick Junction to facilitate improved national and regional connectivity"*.

The review of the NDP must commit to dual tracking the Limerick Colbert to Limerick Junction line. However, the investment and commitment to regional rail must not stop there, it must also support the development of a commuter rail network.

The LSMATS outlines the intention of the NTA to work with Iarnród Éireann, the Southern Regional Assembly, Limerick City and County Council and Clare County Council to provide investment in the rail network for the metropolitan areas as follows

- A new rail station at Moyross
- A new rail station at Ballysimon, including park and ride
- Review the potential for additional stations on an ongoing basis

While we welcome this approach to rail development set out in the LSMATS, given population increases and the development of housing, the Government must further develop a commuter rail system for the metropolitan area of Limerick as part of the National Development Plan review and take a more ambitious approach to rail development - including investment that supports the conversion of the Foynes Rail Line from freight to include passenger traffic also.

Investing in public transport links that connects Shannon Airport with the broader region is essential for economic growth. Developing a dedicated rail connection to Shannon Airport is vital to enhance access for travellers, businesses, and the workforce—especially the more than 10,000 people who commute to Shannon each day. Strengthening this transport link will boost regional productivity, lower travel expenses, and improve the competitiveness of the region.

Including the Shannon Airport Rail Link in the *All-Island Strategic Rail Review*, under Package 1—Short Term and Decarbonisation—marks meaningful progress toward key targets set out in Project Ireland 2040. This initiative aligns directly with policy aims focused on driving economic progress, promoting environmental responsibility, and ensuring balanced regional development. By enabling more efficient travel, cutting dependence on carbon-heavy transport, and attracting increased investment, the rail link promises substantial long-term economic benefits.

The recommendations within the All-Island Strategic Rail Review identify the Shannon Airport Rail Link as a short-term priority, to be delivered by 2030, subject to funding and necessary appraisals. Given its clear economic advantages, it is crucial that this project be prioritised within the National Development Plan (NDP), with secure funding to advance its planning, design, and construction phases, along with a firm commitment to its timely completion.

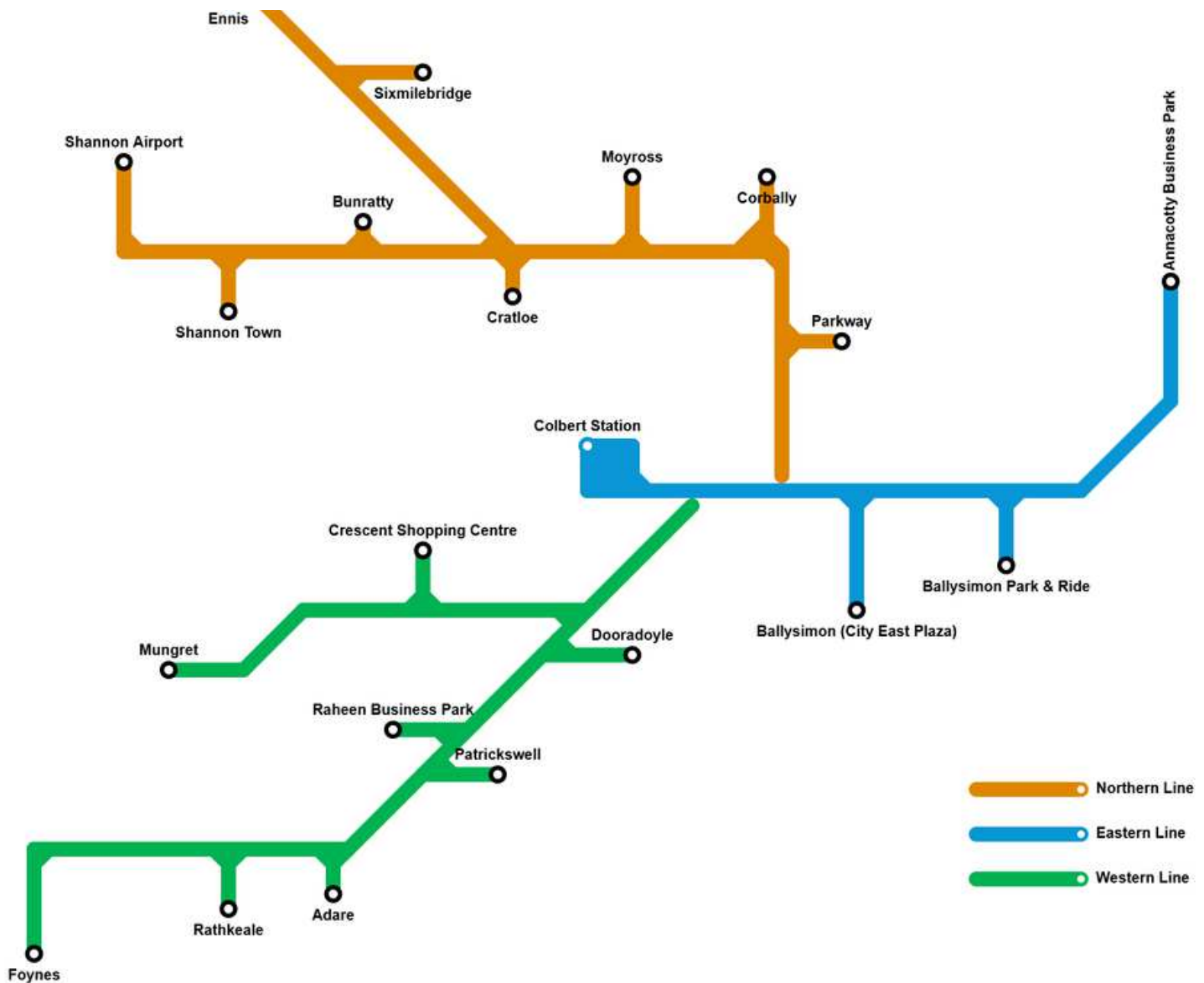
A map of what the commuter rail network in Limerick should look like is included overleaf.

MWDA-11

The NDP must support plans for developing a metropolitan rail system in Limerick, including dual tracking to Limerick Junction



## Metro Rail Network Map



“Funding provided over the next ten years will also support the further development of commuter rail in Galway and Limerick, with significant track and station works proposed for Oranmore and Athenry as well as the development of a new Limerick commuter rail network including new stations on each of the historical rail lines, the detail of which is to be set out in the Limerick-Shannon Metropolitan Area Transport Strategy”

# Airports

Targeted investment in Ireland’s airports is crucial for maintaining and expanding the country’s international connectivity, which is fundamental to sustaining national economic competitiveness. Robust air transport links support the flow of goods and services, attract foreign investment, and strengthen Ireland’s position in the global marketplace. Given evolving geopolitical challenges, ensuring that the aviation network remains resilient is a critical economic priority.

However, the current National Development Plan (NDP) approach—placing responsibility for investment in State airports solely on State-Owned Enterprises—overlooks the pivotal contribution that State-Owned Regional Airports make to economic progress and the overall stability of the aviation sector. These regional airports play an indispensable role in supporting business operations, workforce mobility, and tourism, acting as key drivers of national market and economic strength. These airports also play a pivotal role in forging relationships with international partners - an impact which must not be discounted in today's tumultuous international environment.

Aligned with the Government’s pledge to develop a new Regional Airports Programme (RAP) for 2026–2030 and to review the National Aviation Policy to better leverage regional airports, the NDP must evolve to allow direct grant funding for qualifying State-owned airports. Under existing European Commission guidelines, airports handling under three million passengers are entitled to capital investment support. This need for focused funding to upgrade airport facilities and services and is accepted and incentivised at the EU level.

To guarantee the effective delivery of critical capital projects that underpin operational performance, safety standards, and the long-term resilience of the aviation industry, it is essential that smaller State-Owned Airports be fully included in the upcoming RAP. For Shannon Airport, inclusion in this programme would enable significant infrastructure improvements, the implementation of sustainability measures, and the development of new air routes—each of which generates substantial direct and indirect economic benefits. Integrating Shannon into the RAP will help boost employment, drive regional business expansion, and strengthen Ireland’s aviation landscape against future disruptions. Importantly, having more routes in the regional state-owned airports, particularly to Northern European hubs makes doing business in Ireland more feasible and competitive.

MWDA-12	The NDP must make a commitment for the long-term inclusion of Shannon Airport in the RAP
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# Ports

Shannon Foynes Port is ideally positioned to contribute to expanding port capacity and supporting the transition to a low-carbon economy. Thanks to its advantageous location near the Atlantic’s exceptional wind resource—regarded as among the best globally—and its plans to launch new unitised shipping services that can help reduce supply chain emissions, the Port is set to play a pivotal role in the Government’s Climate Action Plan. This is particularly relevant for energy production and transport activities that require deepwater facilities. Therefore, ensuring the timely development and capital investment in essential port infrastructure at Shannon Foynes is crucial for maintaining international competitiveness, driving strategic economic growth, and achieving climate targets.

Providing the necessary supporting infrastructure—such as deepwater berths and marshalling areas for the offshore renewable energy (ORE) sector—at Shannon Foynes will advance key spatial and economic goals for the Shannon Estuary and the wider southwest region. This aligns with site-specific objectives outlined in the Shannon Integrated Framework Plan for the Shannon Estuary, which emphasises the development of Strategic Development Locations in the Foynes / Shannon Estuary zone. Such investment will attract both domestic and foreign investment, foster job creation in maritime energy and related industries, and align with the Port Company’s own strategic plans for spatial and economic growth.

According to the Irish Port Capacity Study (2023), Ireland is projected to have adequate port capacity across all cargo types—including RoRo, LoLo, dry bulk, break bulk, and liquid bulk—up to around 2040. However, a lack of timely investment in expanding capacity, upgrading infrastructure and equipment, and improving hinterland connectivity could seriously jeopardise the long-term viability of the country’s ports and, by extension, the national economy. This is particularly concerning given the lengthy lead times required for port infrastructure projects.

As highlighted, the sustainable long-term growth of Tier 1 ports such as Shannon Foynes is crucial to adapting to evolving global shipping patterns, boosting trade competitiveness, and advancing Ireland’s offshore renewable energy ambitions. Therefore, sustained investment in port development is essential, especially in light of the growth and expansion goals set out in SFPC’s VISION 2041. Such investment will be key to ensuring that critical infrastructure is delivered efficiently and on schedule to meet future demand.

Given Shannon Foynes Port designation as a Tier 1 Port of National Significance, as well as the port being part of the Ten-T Core Network Corridor the NDP must target investment towards the Port, as well as enabling transport infrastructure to the port such as N21 / N69 Limerick to Foynes Road Scheme.

MWDA-13	The NDP must ensure the support of timely development and capital investment in essential port infrastructure at Shannon Foynes Port
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# Road Network

## N21 / N69 Foynes to Limerick

While the ‘Adare Bypass’ has begun works with a completion target of 30 June 2027, it is crucial that the NDP provides the required Gate 2 funding for the remaining 26 km of the N21/N69 Foynes to Limerick Road Scheme—of which the Adare Bypass is a component. The economic development of Foynes Port and the wider West Limerick area is dependent on this road being delivered in a timely manner. Port capacity growth and provision of Offshore Renewable Energy (ORE) infrastructure will benefit significantly from its uncongested location on the national road. It is critical that the NDP supports this road in the revised document.

MWDA-14	The NDP must allocate the necessary funding for the remainder of the N21 / N69
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## N / M20 Limerick to Cork

Given the N / M20 has been spoken about since 1998, there is a palpable and deeply frustrating lack of urgency surrounding this vital piece of infrastructure, despite its critical importance to balanced regional development and national economic competitiveness. The absence of a high-quality, direct road connection between Ireland’s second and third largest cities is an anomaly by European standards – no comparable EU member state would tolerate such a gap between two major urban centres with combined populations exceeding half a million. Delivering the N / M20 will dramatically enhance connectivity and unlock significant economic potential. This project is not merely a transport upgrade; it is a cornerstone for fostering sustainable growth, boosting productivity, and ensuring that the prosperity of our cities and towns is better distributed.

MWDA-15	The NDP must to acknowledge the importance and prioritise the approval and funding process for the N / M20
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## LNDR Phase 1 - Mackey Roundabout

There will be a long-term need for the LNDR in Limerick as the population, our universities and the city grows. However, the urgent need lies in safety and connection improvements at the Mackey (Newport) Roundabout connecting to the National Technology Park. Given the volume of traffic currently flowing through the park from the M7, the M7 often is backed up at the exit to the Dublin Road. A slip road to the technology park, as well as junction and road improvements is not only critical for safeguarding journeys, but also to ensure enterprise development of the park does not suffer. The NDP must acknowledge the importance of such improvements and allocate the necessary funding to counteract these challenges. Combined with this improvements, and in line with the LSMATS, investment should also take account of the proposed park and ride facility to be brought forward at this location.

MWDA-16	Fund the necessary safety and connection improvements at the Mackey roundabout, as well as PnR facilities
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## Bus Connects

Given recent updates regarding Limerick BusConnects being delayed until 2027. The delay is deeply concerning, as it undermines efforts to deliver an efficient, reliable, and accessible public transport network that is vital for sustaining economic growth and enhancing regional connectivity. This delay will continue to burden businesses and employees with congestion, longer commutes, and limited transport options, ultimately impacting productivity, competitiveness, and our ability to attract and retain talent and investment.

MWDA-17	The NDP must support and accelerate investment in Limerick BusConnects
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# Justice

A well-functioning, safe, and humane prison system is a core pillar of modern justice, ensuring community safety and fostering regional resilience. Limerick Chamber has been a vocal advocate for addressing critical issues such as the lack of visible policing in the city centre and chronic prison overcrowding, working directly with the Minister for Justice to push for actionable solutions. These concerns are driven by feedback from our members and the wider business community, who understand that a secure, well-resourced justice system underpins public confidence, community well-being, and economic stability.

The chronic overcrowding in prisons does more than strain facilities; it creates undesirable conditions for the prison population and allows repeat offenders to continue committing crimes. Ireland’s current prison system operates beyond its designed capacity, as corroborated by findings from the Irish Penal Reform Trust. Addressing these challenges is key to improving outcomes across the justice system.

Limerick Prison, in particular, has been repeatedly highlighted as one of the most overcrowded facilities in the country. In response to a parliamentary question in March 2025, the Minister for Justice confirmed the male capacity for Limerick prison is 286, however at the time of answering there were 372 male prisoners. With regards to female capacity, it is 56, but at the time of answering there were 80 female prisoners. In April 2025, RTÉ published an article citing that the highest level of overcrowding is at Limerick's Women's Prison which at the time was 48% over capacity, meanwhile the same article highlights that the male prison was 28% over capacity.

This situation has deteriorated further in recent years due to population growth, increasing court committals, and insufficient investment in new or expanded facilities to match modern rehabilitation and public safety needs

## Increasing Capacity

To tackle these critical issues, the NDP must make prison capacity a priority. Limerick Chamber firmly advocates for:

The development of cost-effective, modern prison facilities that meet international human rights standards and support rehabilitation practices. A commitment to immediate expansion and upgrades of existing infrastructure, such as Limerick Prison, to reduce overcrowding and improve conditions for staff and inmates alike.

This is about more than just adding walls or beds. It’s about safeguarding communities, ensuring humane treatment, and maintaining economic and social stability. Limerick Chamber calls for a balanced approach that combines infrastructure upgrades with investments in community-based alternatives and diversionary initiatives to address underlying causes of crime. The situation requires urgent action. We recommend that the revised NDP includes: A detailed, time-sensitive plan to develop additional, high-quality prison capacity potentially including a new national prison. Provisions for urgently needed expansions and upgrades to relieve stressed facilities like Limerick Prison.

This is not just a policy challenge; it is a societal imperative. Limerick Chamber remains committed to collaborating with the Department of Justice and key stakeholders to ensure a secure, effective, and humane criminal justice system as part of the NDP Review 2025. Together, we can ensure progress that protects communities and upholds critical standards of justice.

MWDA-18	Commit to increasing the national and local prison capacity
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# Other Sectors

## City Centres

The NDP should prioritise a renewed focus alongside a capital investment programme dedicated to revitalising city centres. While the URDF has made a positive impact by providing funding for targeted projects, particularly in city centres, there is an evident need for enhanced accountability in the delivery of funded initiatives. Additionally, a sustainable solution is required to support local authorities in financing essential infrastructure projects, such as public realm improvements and green space developments.

Project Ireland 2040, the National Planning Framework and the National Development Plan all prioritise city growth and more people living in urban and town centres. However, there is no substantial investment support network deployed to achieve this which results in the goals of Project Ireland 2040 not being achieved.

### Perception and Reality of Safety

A growing number of residents and visitors perceive Irish city centres as unsafe, particularly in the evenings. This perception—often driven by visible substance misuse, inadequate policing, and vacant buildings—reducing footfall and undermines local business viability. Indeed the Limerick Chamber City Centre Report found that 50% of city centre users feel unsafe, compared to 31% that feel safe. 87% of survey respondents felt that there was not a sufficient police presence in the city centre.

### Underutilised and Derelict Buildings

Dereliction and vacancy are endemic in many Irish cities. Despite various regeneration schemes, the pace of bringing unused buildings back into productive use has been glacial, in part due to fragmented ownership, insufficient enforcement, and financial disincentives to redevelop.

### Inadequate Housing Supply in Urban Cores

High costs have limited new housing development in city centres particularly for workers. This has pushed populations to suburbs and beyond, undermining sustainability and exacerbating transport congestion as well as a hollowing out of the city centre. For example, using Census data, our city centre report found that just 2% of the city centre housing stock had been built after 2016. Furthermore, Census data shows that just 7% of the city population are homeowners.

### Economic Displacement

The hollowing out of retail in favour of online commerce has led to a crisis of purpose for city centres. Without strategic intervention, these areas risk becoming increasingly dormant after business hours.

### Concentration of Social Services

Modern Irish cities have become hubs for the provision of social services to those at risk or in need, however, there is no cohesive plan for the provision of these services, nor is there increased support elsewhere in the system to adequately deal with the challenges that emerge from such a concentration of social service provision.

The NDP must take decisive action for city centres, it is not adequate, or fair, to solely dedicate the management and funding of city centres to Local Authorities going forward and they will need to be appropriately supported.

MWDA-20	The NDP must bring forward a capital investment programme and strategy for city centres
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# Other Sectors

## Health

The NDP must expand healthcare capacity in the Mid-West by opening a second A&E and boosting maternity capacity. It is critical that the NDP combats the existing infrastructural gaps present in the Mid-West that can often lead to overcrowded emergency departments, and overall capacity shortfalls.

The most recent HIQA report into healthcare at the University Hospital Limerick (UHL), published in May 2024, highlighted the issues with an overcrowded emergency department (ED). The report provided four judgements across four national standards. 5.5 was found to be "partially compliant", 6.1 was found to be "substantially compliant", 1.6 was found to be "non-compliant" and 3.1 was found to be "partially compliant". The report further states *"The ongoing mismatch between the number of people attending the emergency department and the hospital's capacity, resulted in an overcrowded ED with admitted patients accommodated in the ED"*.

Combined with the above report from HIQA, figures from the Irish Nurses and Midwives Organisation (INMO) consistently highlight UHL as the most overcrowded hospital in Ireland. Their latest press release, from May 2025, highlighted UHL as the most overcrowded hospital with 2,055 patients followed by University Hospital Galway with 919 patients.

MWDA-19	The NDP must commit to boosting hospital capacity across the Mid-West, particularly A&E and Maternity
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