Limerick Chamber
Advancing business together

Regional Spatial & Economic Strategy

Limerick Chamber Submission to Issues Paper for Southern Regional Assembly RSES

May 2026

Table of Contents

Introduction

Limerick Chamber welcomes the opportunity to respond to the Southern Regional Assembly's pre-draft issues paper consultation on the Regional Spatial and Economic Strategy (RSES) for the Southern Region and the Limerick–Shannon Metropolitan Area Strategic Plan (LSMASP).

Limerick Chamber is the largest business representative organisation in the Mid-West, representing over 400 member organisations and supporting approximately 50,000 jobs across the region. Our membership spans indigenous enterprise, multinational corporations, exporters, retailers, logistics providers, renewable energy companies, professional services, education, tourism, healthcare and customer-facing businesses.

This submission is framed around one central proposition: the next RSES and LSMASP must move from broad strategic ambition to a delivery-led capital investment framework with delivery accountability at its core. The previous RSES and LSMASP provided an important planning foundation for regional development, compact growth and improved connectivity. However, the scale of the housing, infrastructure, energy, transport and regional competitiveness challenges now facing the Mid-West requires a sharper focus on infrastructure, investment sequencing, delivery responsibility and measurable implementation.

The Limerick–Shannon Metropolitan Area is uniquely positioned to deliver national objectives on balanced regional development, energy security, enterprise growth and sustainable urban development. It contains nationally significant assets, including Limerick City, Shannon Airport, Shannon Foynes Port, the Shannon Estuary, the University of Limerick, Technological University of the Shannon, major employment locations, a growing urban population and a strategic position on the Atlantic Economic Corridor. These assets must be treated not as supporting considerations, but as core national growth enablers.

Limerick Chamber's response therefore recommends that the new RSES and LSMASP include a prioritised capital investment schedule for the Mid-West and Limerick–Shannon Metropolitan Area, covering transport, housing, water services, energy, ports, aviation, city-centre regeneration, education, healthcare, justice and enabling utilities. The RSES should clearly identify the infrastructure and planning required to support population and employment growth and set out how that infrastructure will be planned, funded, delivered and monitored.

Strategic Context

The Southern Region has the scale, assets and economic base to make a much larger contribution to national growth and better cater to its enterprise and employment base. However, this will only be achieved if the revised RSES is more directly connected to capital investment, delivery mechanisms and accountability for delivery.

The next RSES must avoid becoming a too high-level policy or planning framework that identifies growth without identifying the infrastructure required to enable that growth. Population targets, employment targets and compact-growth objectives must be matched with the water, transport, housing, energy, education, healthcare and community infrastructure needed to make the population and regional development targets outlined under the National Planning Framework (NPF) achievable.

The Mid-West has experienced persistent delays in the delivery of strategic infrastructure. This includes delays or uncertainty around major transport projects, housing-enabling infrastructure, renewable energy infrastructure, grid capacity, wastewater treatment, city-centre regeneration, public realm investment and strategic access to Shannon Foynes Port and Shannon Airport. These delays undermine business confidence, constrain housing delivery, reduce regional competitiveness and weaken the State's own objective of balanced regional development.

Accordingly, Limerick Chamber recommends that the RSES adopt a delivery-first approach based on the following principles:

- Enabling the growth targets outlined under NPF must be infrastructure-led.
- Capital investment must be spatially aligned with RSES and MASP objectives.
- Each strategic growth location must have an enabling infrastructure plan.
- Delivery responsibility must be assigned to named public bodies.
- Progress must be monitored annually using measurable indicators.

Implementation

The implementation of RSES programmes often depends on actions taken by others, outside of the Regional Assemblies, spanning across the entire sphere of public organisations and state-owned bodies. While this means that close collaboration and shared ownership should be at the core of delivery, it is often not the case. This ultimately negatively impacts the timely delivery of projects and infrastructure.

The Regional Assembly should be capable of supporting and directing the co-ordination and delivery of infrastructure projects - but that is not the case. Meaning delivery of the RSES is almost entirely at the mercy of other organisations. Unfortunately, an integrated delivery approach was envisaged at the first publication of Project Ireland 2040 but has yet to come to pass in any meaningful way.

While Limerick Chamber understands that the Southern Regional Assembly operates within the hierarchical structure of Government, planning and policy, we would like to see the Southern Region play a larger role in tackling the fundamental issues of the region through co-ordination and delivery, while also monitoring the progress of various bodies tasked with delivery.

Issues

The issues outlined in our submission are not unique to the Mid-West, or the Southern Region, and can be relatively easily summed up. **However, what is unique to the region is the level at which it is funded, which compounds many of the issues outlined below, and it covered in greater detail on the next page.**

1. The region is not getting the Government investment that it requires or deserves
2. Housing is not being delivered at the pace that is required, and national policy is one size fits all which is not the case
3. Transport provision, like housing, has failed to keep pace with population growth and is not given the prioritisation that it deserves
4. There are a number of unique assets and opportunities in the region that are not being leveraged appropriately, or else are not being advanced quickly enough.
5. City Centres are almost in stasis with significant and well documented issues that have yet to be remedied.
6. We are not thinking strategically about the future development of the region or the nation, and projects like a metropolitan rail or floating offshore wind are almost viewed as too blue sky, when in reality there is a very strong economic and sustainability case that other EU states are taking advantage of.
7. Sometimes there is policy support, without adequate funding attached, which leads to projects going nowhere.
8. With funding, sometimes funding is allocated under the likes of the URDF, and projects are not advanced beyond a press release.
9. Accountability around delivery is extremely poor with no consequences for under delivery, this puts significant projects at risk.

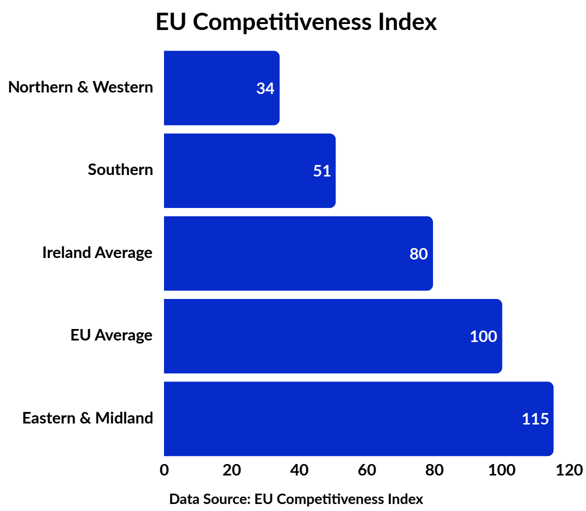
Investment Disparity

The EU Regional Competitiveness Index highlights how this underinvestment can translate into competitiveness challenges at a European level. The EU27 index average is equal to 100. Meanwhile, the infrastructure index for Eastern and Midland (underpinned by Dublin) is 115.2, the Southern Region is 50.7 and the Northern and Western Region is 34.1.

The *Regional Infrastructure Tracker* published by the Northern and Western Regional Assembly highlights that between 2016 and 2024 the Eastern and Midland Region accounted for 66.5% of published public tenders worth over €1 million. When examining published public tenders over €20 million, the Eastern and Midland share ballooned to 75% of the overall share.

While the NPF aims to bring parity with the Dublin, the Greater Dublin Area, and the rest of the country there is very little to suggest that this is happening in reality. This will be compounded by the fact that the Review of the National Development Plan provides no details regarding regional or project level investment, with the only specific project mentioned being the Metrolink project in Dublin. This is wholly unacceptable and provides no assurances to the development of the regions.

Both the RSES and LSMASP should aim to rectify this disparity by prioritising projects of impact and scale.



Further analysis from the Southern Regional Assembly highlights a clear disparity in committed capital funding under the NDP across Ireland's metropolitan areas, with Limerick-Shannon receiving a comparatively low level of investment.

Limerick-Shannon has been allocated €1.86 billion, representing just 3.5% of total committed capital funding. This is significantly below Dublin's €40.2 billion, or 77.3%, and also trails Cork (€6.65bn) and Galway (€2.42bn). While Limerick-Shannon receives more in total than Waterford, its per capita allocation is the lowest of all five metropolitan areas, at €12,980 per person.

On a per capita basis there is a sharp contrast, with Dublin at €26,901 per person, Galway at €24,003, Cork at €20,204, and Waterford at €15,251. In practical terms, Limerick-Shannon's per capita investment is less than half of Dublin's and substantially behind other regional cities.

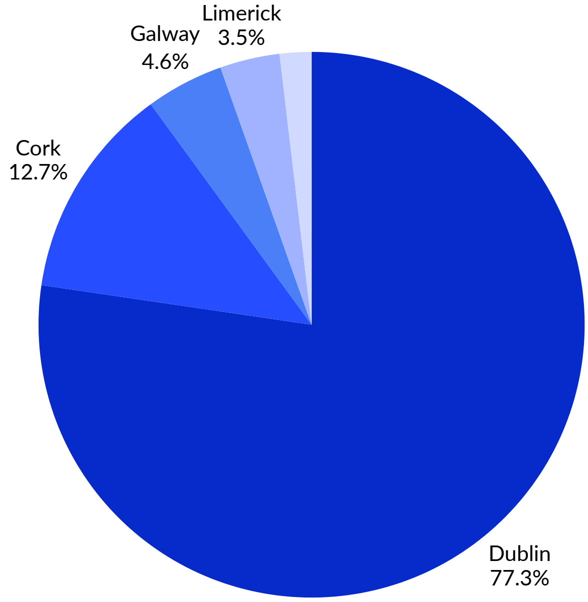
Therefore, based on analysis, Limerick-Shannon is not receiving a proportionate share of capital investment, raising concerns about regional balance, infrastructure delivery, and the area's capacity to support long-term growth.

This disparity of investment has clearly led to challenges in the region across transport, housing, healthcare and other much-needed infrastructure.

It should be a priority item of the RSES and LSMASP to strongly advocate for increased investment in Limerick and the Mid-West.

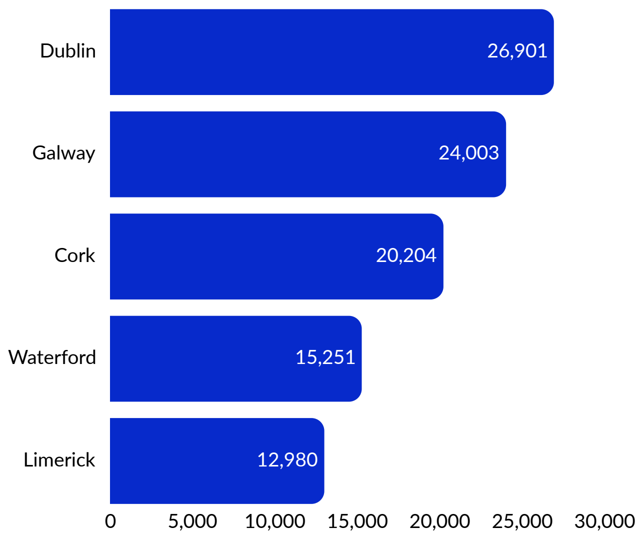
Share of Committed Capital Funding Under NDP

(Metropolitan Areas)



Source: Southern Regional Assembly

Per Capita Share of Capital Funding (€)



Source: Southern Regional Assembly

Liveable Region

Housing

Delivery & Compact Growth

Limerick Chamber supports the principle of compact growth and the need to locate more housing in existing urban areas, particularly within Limerick City and its metropolitan settlements. However, compact growth will not be achieved through policy aspiration alone. It requires a targeted policy and capital programme to unlock brownfield, infill and urban regeneration sites.

Housing delivery in Limerick and the wider metropolitan area remains below the level required to meet current and future population targets, at a county level, in Limerick, housing provision is decreasing rather than increasing. This is a direct economic competitiveness issue. Businesses across the Mid-West consistently identify housing availability and affordability as one of the greatest barriers to recruitment, retention and expansion.

The RSES and MASP should therefore identify housing delivery as both a social priority and an economic infrastructure priority. **The next strategy should include a specific housing-enabling programme for Limerick–Shannon.**

Limerick Chamber also recommends that the MASP include a brownfield and compact-growth delivery table identifying the key sites, infrastructure deficits, responsible agencies and delivery actions required to activate each location.

There is a clear viability gap for apartment and brownfield development outside Dublin. This is particularly acute in Limerick, where construction costs, financing constraints, site complexity, conservation requirements and lower achievable rents or sales values can make city-centre development commercially unviable.

The RSES should explicitly recognise that compact growth in regional cities will require additional support and outline potential routes to overcome these issues - without adequate intervention in the regional cities, the compact growth targets or Project Ireland 2040 will not be achieved.

A failure to address viability will result in continued suburban growth, further car dependency and a weakening of the city centre. Compact growth must be backed by capital funding, not merely by planning policy.

Furthermore, **to ensure compact development in and around city centres, the RSES and MASP must be explicit in terms of developing residential accommodation in flood potential areas.** National Policy Objective 78 as part of the National Planning Framework states *"Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management;"*

Therefore, with the proper assessment and justification, housing can be delivered on these lands, which will bolster housing provision in and around the city centre.

Zoned and Serviced Land

The RSES should recognise that zoning more land alone will not deliver housing. However, there is a need to ensure that appropriately located, serviced and deliverable land is available in the right places. The key issue is not theoretical land supply but activated land supply.

Limerick Chamber recommends that the RSES and MASP require a published serviced-land audit for the Limerick–Shannon Metropolitan Area, identifying:

- Lands with immediate water, wastewater and transport capacity.
- Lands requiring specific enabling infrastructure.
- Lands suitable for short-term delivery.
- Lands suitable for medium-term phased delivery.
- Barriers to activation, including ownership, utilities, access, planning constraints and viability.

This should inform infrastructure sequencing and capital funding priorities.

Limerick must also be attractive to developers and builders, **a common issue spoken about from the construction sector is that Limerick lacks the scale of landbanking available and thus remains unattractive. For the RSES to enable reaching the targets in the NPF it must acknowledge this issue and bring potential solutions forward.**

Innovative Accommodation Models

The RSES should support high quality innovative accommodation models where a clear, evidenced need is identified through Housing Need Demand Assessments and is supported by the Sustainable Urban Housing Design Standards for New Apartments. Such schemes should be provided on state-owned land where possible and should include professionally managed high-quality shared amenities and communal facilities and be located as such to reduce travel times and support modal shift while providing longer-term, secure and affordable rental options.

Schemes like this would help to meet the demand of key sectors, by providing housing options located on well-serviced, sustainable and accessible sites close to major employment centres.

The recently published European Affordable Housing Plan extended its support for co-living as a innovative model for younger cohorts *"Access to affordable housing is increasingly out of reach for many young people, limiting their independence and participation in society and in the economy. Addressing this challenge requires a comprehensive approach combining increased investment into student housing, targeted measures that expand affordable rental and ownership opportunities specifically for younger generations and support to innovating housing models such as co-living spaces".*

The European Commission report encourages that *"Member States are encouraged to develop and implement targeted schemes to improve access to housing for young people, including affordable rental options and support for shared or co-living arrangements. " - this should be an explicit part of the RSES and LSMASP.* What is important to note is that co-living represents a sector specific intervention for a certain targeted cohort, without which it is unlikely that smaller, but high quality, housing will be provided for these household sizes.

Enabling Infrastructure

Both the RSES and LSMASP must callout the delay in delivering water and grid infrastructure upgrades and connections, both of which are critical to development but in particular residential development. It would be beneficial as part of the RSES if the Regional Assembly committed to undertaking research to examine connection times for residential development across the region.

Healthcare

Hospital Network Expansion

There is a clear and demonstrable need to expand hospital and wider healthcare facilities across the Mid-West. Limerick Chamber supports to recently announced site acquisition to expand hospital facilities in Limerick for the entire region. **RSES and LSMASP must also support this increased healthcare provision.**

However, implementation of such facilities is critical. **RSES and LSMASP must support wider implementation of public transport and traffic management around such facilities to ensure minimal disruption to the existing flow of traffic.**

Justice

Prison Capacity

As highlighted in the Limerick Chamber submission to the National Development Plan, Limerick Prison is operating at critical overcapacity. Yet justice infrastructure remains absent from regional spatial planning frameworks. Unlike health, transport or education, prison capacity has not been treated as a growth-sensitive public asset. The RSES must rectify this by formally recognising prison and justice infrastructure as a regional and population development need.

Limerick City Centre

Quality of Life and City Centre

A liveable region depends on more than housing numbers. Limerick City Centre must be supported as the primary urban, commercial, cultural and residential heart of the Mid-West. **This requires a whole-of-city investment approach covering public realm, safety, dereliction, cultural infrastructure, mobility, retail vitality, evening economy, policing, family-friendly housing and amenity.**

The RSES should recognise that investment in public realm, safety, cultural infrastructure, childcare, education, healthcare and recreation is economic infrastructure. These are the conditions that allow employers to attract talent and allow residents to choose urban living.

Commercial Vacancy

From an economic development strategy perspective, **the RSES and LSMASP should help to address the ongoing blight of commercial vacancy in key towns and cities**. Commercial vacancy poses a huge challenge for city centre revitalisation and attractiveness. It is also seen as impacting existing business who make an effort to have their premises aesthetically pleasing, while vacant premises can be left to look run down.

Over the Shop Living

Over the shop living represents a huge opportunity for city centre revitalisation, however, to date uptake has been low. From an economic development and spatial planning perspective, if **the RSES and LSMASP was to encourage more over the shop living**, not only would it help to address the commercial vacancy issue, but it would also encourage more people to live in the city centre.

Delivery of Scale

A distinct lack of housing delivery of scale is present in Limerick. **The RSES and LSMASP must act to encourage an approach similar to Hafencity to ensure that scale of delivery can be accommodated in the city centre.** Limerick Docklands and Dock Road areas are a potential prime area for mixed use delivery.

Brownfield & Infill Site Development

Brownfield and infill development in the city centre currently represents a huge viability challenge, but if tackled correctly it can also represent a huge opportunity. **The RSES and LSMASP should support the development of brownfield and infill sites to encourage more worker friendly housing in city centre locations.** Bringing forward requirements and policies to address this issue will encourage a step change in city centre footfall and revitalisation.

Social Service Provision

There is a concern that much of the social service provision for people at risk is provided in city centres, This can result in an overconcentration of people at risk in one area, this has wider implications for revitalisation and attractiveness of certain areas within cities. **The RSES and LSMASP must identify this as a challenge to growing cities and provide guidance on how this concentration may be better dispersed throughout a region and county.**

Tenure Mix

Historically speaking, the tenure mix of the city centre has become less diverse over time with workers normally living in suburban locations rather than the city centre, sometimes this is by choice, other times it is because of the lack of appropriate housing and services in city locations. **RSES and LSMASP must make it a distinct action point to attempt to encourage a more diverse tenure mix in city centres going forward, ensuring to front load delivery of housing options to counteract the under provision of worker friendly houses in previous years - with any land or housing being disposed of by local authorities to be targeted towards affordable housing for workers.**

Public Realm

Appropriate and well mainted public realm is critical to the attractiveness of cities, too often is poor public realm implemented and not maintained. **The RSES and LSMASP should support improved implementation of public realm as a critical factor in economic development** and prioritise accessibility, comfort and safety of both residents, shoppers and businesses alike.

Shannon Town

Recognition of Shannon

Shannon Town and the surrounding area generates significant national and regional economic output, hosting an international airport and one of the largest FDI clusters outside Dublin. However, the perception of Shannon must be changed, and the RSES can support this. Shannon must be recognised as a national strategic growth centre with the potential to deliver compact urban growth that will shift the perception of the area as a desirable place to live, as well as do business.

Shannon Town Masterplan

Advancement of the Shannon Town Masterplan is critical to the economic growth and competitiveness of the LSMASP area and the wider region. **The RSES and LSMASP must support the ongoing work to develop the masterplan.** The One Shannon Hub is the first step in a series of steps to ensure that Shannon Town will be a more attractive destination in which to live, work and do business unlocking development potential in Shannon Town Centre and guiding its built and economic development.

Advancement of the Shannon Flood Relief Scheme will be critical in the future construction of infrastructure in Shannon, and must be noted as a matter of priority.

Connected & Autonomous Vehicles

The RSES and LSMASP can position Shannon and the wider region as a leader in emerging transport and mobility technology ensuring continued economic development in the area which will benefit the entire region.

Wild Atlantic Way

Both the Shannon Area and Shannon Airport must be positioned as a gateway to the Wild Atlantic Way.

Shannon Airport is currently an underutilised state-owned asset with significant capacity to increase passenger numbers at the airport. Unfortunately, current aviation policy and patterns are too Dublin centric, and lead to day-trip tourism to the regions rather than longer-term tourism and thus it limits economic growth and consumer spending.

Positioning the region as the primary international gateway to the Wild Atlantic Way, enabling direct access to the Western regions will help to increase overnight stays and regional spend.

Limerick-Shannon Economic Zone

Too often planning, spatial and economic frameworks are constrained by administrative boundaries. In reality, the Limerick-Shannon Economic systems is a functional metropolitan region expanding both sides of the Shannon Estuary bolstered by Shannon Airport and Shannon Foynes Port as gateways for international trade and travel. The RSES and LSMASP must begin to progressively evolve wider spatial and economic planning to acknowledge the area as a functional Strategic Economic Zone that is based off comparative advantages, collaboration and economic geography rather than purely administrative boundaries.

Green Region

Energy Hub

The Southern Region, and the Shannon Estuary in particular, has a once-in-a-generation opportunity to become a national and European energy hub. The RSES must place the Shannon Estuary at the centre of Ireland's renewable energy, offshore wind, floating offshore wind, gas provision and storage, green hydrogen, industrial decarbonisation and energy-security strategy.

Limerick Chamber strongly supports the development of offshore renewable energy and floating offshore wind. However, realising this opportunity requires a coordinated capital investment and planning framework. The RSES should not simply identify renewable energy potential; it should identify the infrastructure and policy actions required to convert that potential into jobs, investment and energy resilience - this includes highlighting the existing infrastructure available that makes the area unique.

The RSES should, from a planning and economic development point of view:

- Delivery of port infrastructure at Shannon Foynes Port to support offshore wind and floating offshore wind.
- Grid reinforcement and connection capacity across the Mid-West.
- Strategic industrial lands for energy-intensive and green enterprise with the co-location of large energy users and readily available energy.
- Green hydrogen production, storage and distribution infrastructure.
- Transitionary fuels such as Liquefied Natural Gas.
- The construction of biomethane plants.
- Skills and training investment aligned with offshore wind and energy transition.
- Planning and consenting capacity for renewable energy infrastructure.
- Investment in road and rail access to port and estuary assets.

Port-led Development

Shannon Foynes Port

Shannon Foynes Port is a strategic national asset and must be treated as such in the RSES. It is central to freight, trade, offshore renewable energy, energy security and industrial development. The next RSES should identify the port as a core growth enabler for the Southern Region and the State.

Limerick Chamber recommends that the RSES include a specific Shannon Foynes Port and Estuary Investment Framework covering:

- Limerick–Foynes rail delivery and future freight and passenger services.
- Foynes port access and road connectivity.
- Port capacity and offshore wind staging infrastructure.
- Climate resilience and adaptation of port infrastructure.
- Land-use planning for port-related industrial development.
- Integration with Shannon Estuary Economic Taskforce (SEETF) recommendations.
- Grid, hydrogen and energy infrastructure planning.

The RSES should also specifically note the importance of funding and delivering the remainder of the N69 Limerick City to Foynes Road by 2030 for Foyne's classification as a TEN-T port.

The Southern Region, and the Shannon Estuary in particular, has a once-in-a-generation opportunity to become a national and European energy hub. The RSES must place the Shannon Estuary at the centre of Ireland's renewable energy, offshore wind, floating offshore wind, gas provision and storage, green hydrogen, industrial decarbonisation and energy-security strategy.

Limerick Chamber strongly supports the development of offshore renewable energy and floating offshore wind. However, realising this opportunity requires a coordinated capital investment and planning framework. The RSES should not simply identify renewable energy potential; it should identify the infrastructure and policy actions required to convert that potential into jobs, investment and energy resilience - this includes highlighting the existing infrastructure available that makes the area unique.

The RSES should, from a planning and economic development point of view:

- Delivery of port infrastructure at Shannon Foynes Port to support offshore wind and floating offshore wind.
- Grid reinforcement and connection capacity across the Mid-West.
- Strategic industrial lands for energy-intensive and green enterprise with the co-location of large energy users and readily available energy.
- Green hydrogen production, storage and distribution infrastructure.
- Transitionary fuels such as Liquefied Natural Gas.
- The construction of biomethane plants.

Foynes Island Deepwater Port

SFPC is progressing its 30-year strategic port masterplan, Vision 2041, originally prepared in 2013 and updated through the Vision 2041 Strategic Review in 2022. The plan sets out SFPC's long-term economic and spatial development strategy to position the Shannon Estuary as a major international port and logistics hub, building on its deepwater capacity and global connectivity.
A key project within Vision 2041 is the Foynes Island Deepwater Port Development, which is central to unlocking this ambition. Located directly across the main berthing channel from the Port of Foynes, Foynes Island is being advanced as a multipurpose deepwater terminal. It will support general cargo growth, address capacity constraints at the existing inner port, and provide critical infrastructure for offshore renewable energy projects off Ireland's Atlantic west coast, including integration, pre-commissioning, deployment and maintenance activity.

The development will enable SFPC to expand existing operations, respond to national Lo-Lo capacity constraints, and accommodate larger vessels with deeper drafts in line with global shipping trends. It will also provide the quayside infrastructure needed to handle containerised cargo.

Consistent with Vision 2041, the project will support the following strategic objectives: Deliver offshore wind at scale, decongest and decarbonise Ireland's supply chain, drive regional economic development and job creation in the Shannon Estuary and support Ireland's green industrial development

Strategic Integrated Framework Plan

The consultation documents are a positive starting point, recognising energy security as a regional challenge; the role of renewables; infrastructure deficits; the strategic importance of ports, marine assets, digitalisation and smart-region infrastructure. The LSMASP Issues Paper also recognises Shannon-Foynes Port as a Tier 1 port and places the Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) within the current MASP spatial structure.

This recognition should be retained and strengthened. The SIFP has established policy status and identifies Strategic Development Locations around the Estuary, including the Tarbert-Ballylongford / Ballylongford landbank. The Draft RSES and Draft Limerick-Shannon MASP should expressly support delivery of the SIFP and its Strategic Development Locations, subject to environmental, planning and consenting requirements. This would also align with the local planning framework for North Kerry, including the Kerry County Development Plan, which recognises the strategic planning role of the Tarbert-Ballylongford / Ballylongford landbank.

Diversity of Supply

Transitionary Fuels

The Shannon Estuary should be identified as a nationally significant multi-energy, port, marine, industrial and digital infrastructure hub - not solely as an offshore renewable energy location. Its strategic potential extends to LNG, gas infrastructure, flexible and dispatchable power generation, grid reinforcement, hydrogen-ready infrastructure, energy storage, port and marine logistics, industrial development and data-centre-enabling infrastructure.

The Draft RSES should also align with national and EU energy-security policy. The Government's Policy Statement on Security of Electricity Supply (November 2021) identifies security of electricity supply as a national priority and supports new conventional generation, including gas-fired generation, to underpin renewable electricity growth. It also supports grid infrastructure, interconnection, storage and natural gas transmission and distribution. The RSES should therefore recognise regional gas-network expansion where it supports security of supply, strategic employment, industrial development and future-ready energy infrastructure.

This approach is reinforced by the Shannon Estuary Economic Taskforce Report, which states that an "LNG import/storage facility and electricity generation" would be a significant strategic investment in North Kerry / West Limerick and would help attract further major capital investment. The Draft RSES and Draft Limerick-Shannon MASP should reflect that regional policy context.

Commercial LNG infrastructure would diversify Ireland's gas supplies and reduce reliance on imports via the UK, supporting REPowerEU objectives while maintaining Ireland's transition to a renewables-led energy system. The RSES should acknowledge this policy direction.

The Government's Energy Security in Ireland to 2030 / Security of Supply Review recognises the need to strengthen gas security and resilience. We support Gas Networks Ireland's proposed strategic non-commercial gas emergency reserve in Clare as a State-led storage and security-of-supply measure. This is complementary to commercial LNG and gas infrastructure brought forward by third parties through statutory planning, environmental and consenting processes, particularly where it contributes to energy security, competition, resilience and regional development. The Review also confirms that the Shannon Estuary may uniquely meet the requirements for LNG terminal development in Ireland.

EU Alternative Fuels Infrastructure policy further recognises the role of LNG and liquefied methane in transport and ports, including LNG refuelling in maritime ports. The RSES should therefore recognise that port-related LNG infrastructure can support maritime decarbonisation, alternative fuels, port competitiveness and the transition to lower-carbon and renewable gases.

LEU Energy Supply

There is huge concern from Large Energy User (LEU) businesses located in business parks regarding future energy supply and grid ability. While grid upgrades are welcome, the time horizon is seen as too long to make a short or medium term impact on boosting business' supply of energy, but also enabling growth of businesses. Therefore, the RSES and MASP should support businesses and business / industrial parks to fully take advantage of diversified mix such as, but not limited to, district heating and biomethane. Provision / support as part of RSES should be done on a mapped basis, prioritising those areas with the highest need and economic impact. Furthermore, the imperfection charge and the marginal price of electricity being set by natural gas is cause for concern of LEUs and where possible the RSES should bring forward remedies from an economic development and spatial planning basis to allow these economic areas to generate their own energy.

Strategic Energy & Renewables Accelerator Ireland (SERAI)

Limerick Chamber recommends that the RSES explicitly identify and support the establishment of a Strategic Energy & Renewables Accelerator Ireland (SERAI): a plan-led framework to position the Shannon Estuary as the location for Ireland's national solution for the co-location of renewable and transition energy generation, energy storage and conversion technologies, and large energy users within a Green Energy Park model.

SERAI should be established as a strategic planning, infrastructure and investment mechanism across the Shannon Estuary Region, taking in Limerick, Kerry and Clare. Its purpose would be to move the Estuary from recognised potential to coordinated delivery by aligning spatial planning, energy planning, enterprise policy, port investment, grid and gas infrastructure, industrial land activation, skills development, environmental assessment and State supports. The framework should support the identification of the Port of Foynes and the wider Shannon Estuary as Ireland's first Green Energy Park of scale, with SERAI providing the governance and delivery structure through which that designation can be implemented.

The policy opportunity is immediate. The Government's Large Energy User Action Plan (LEAP) supports a plan-led approach to co-locating the most energy-intensive sectors with renewable energy supply in Green Energy Park locations across the regions. This approach is intended to align industrial policy with strategic Government priorities, accelerate regional development opportunities in strategic energy-intensive sectors, and avoid large energy-user demand emerging in an ad hoc or grid-constrained manner.

SERAI would provide the regional structure through which the Shannon Estuary can respond to this policy direction. Rather than generating renewable energy offshore or remotely and transporting it long distances through constrained grid networks, the Green Energy Park model brings industry to the energy source, optimises local energy use, reduces transmission losses, and supports flexible demand solutions. In practical terms, SERAI would identify where energy-intensive and high-value industrial activity can be located in direct proximity to renewable generation, grid and gas infrastructure, hydrogen potential, port capacity, water infrastructure and transport links.

SERAI is also aligned with the EU's revised Renewable Energy Directive (RED III), which requires Member States to identify land, sea and inland water areas necessary for renewable energy plants and related infrastructure, and provides for the designation of Renewable Energy Acceleration Areas to speed up deployment in suitable locations. The RSES should therefore identify the Shannon Estuary as a candidate location for Renewable Energy Acceleration Area designation, or for a related regional acceleration framework under national implementation of RED III. This would not remove the need for environmental assessment, infrastructure planning or public participation. Rather, it would allow the State to proactively identify lower-risk, infrastructure-ready and strategically appropriate areas where renewable energy, grid, storage, hydrogen, port and industrial decarbonisation projects can be progressed at pace.

The proposal is also consistent with the EU Green Deal, REPowerEU, the European Commission's Clean Industrial Deal and the accompanying Clean Industrial Deal State Aid Framework. These instruments create an opportunity for Ireland to use more targeted supports for clean energy, industrial decarbonisation, clean technology, renewable generation, grid-enabling infrastructure, green hydrogen, port readiness and decarbonised manufacturing. For the Shannon Estuary, the opportunity is not simply to generate renewable energy, but to build a new industrial ecosystem around it.

The Shannon Estuary is particularly well placed for SERAI because it already possesses many of the physical, economic and institutional assets that other locations would need to create from scratch. Co-location policy will only succeed where renewable energy potential is matched by developable land, grid access, port capacity, transport connectivity, enterprise demand, energy storage and conversion opportunities, and skills. The Shannon Estuary offers that combination at national scale.

The Estuary benefits from a unique combination of natural assets, energy infrastructure, port capability and land of scale. These include its deep-water estuary, proximity to Atlantic offshore wind resources, sheltered maritime conditions, the Moneypoint grid hub and existing energy generation legacy sites, expansion opportunities through Shannon Foynes Port, access to international markets, strategic industrial landbanks and capacity for large-scale industrialisation.
In particular, SERAI should connect the following assets into one coherent investment proposition:

- **400 kV transmission infrastructure and proximity to national electricity and gas transmission networks;**
- **Extensive development lands originally identified as Strategic Development Locations in the Strategic Integrated Framework Plan for the Shannon Estuary and appropriately zoned in the Kerry, Limerick and Clare Development Plans;**
- **Existing strategic industrial sites including Moneypoint and Tarbert;**
- **The recently permitted 600 MW power plant in Ballylongford, a key component of the proposed Shannon LNG project and a significant step forward for strategic energy infrastructure and storage;**
- **The identification of Cahercon as the site for Ireland's new Strategic Gas Emergency Reserve, a State-led project designed to strengthen Ireland's energy security;**
- **The Next Generation Power Station by SSE Thermal at Tarbert, which is being developed to run on 100% sustainable biofuels;**
- **Access to large-scale offshore renewable energy generation and floating offshore wind supply-chain opportunities;**
- **Deep-water port access through Shannon Foynes Port, together with Shannon Airport, the Limerick-Foynes rail corridor and strategic road links;**
- **A strong graduate, research and skills pipeline from the University of Limerick, Technological University of the Shannon, Mary Immaculate College and other regional education and training providers.**

The characteristics of the Shannon Estuary - renewable energy supply, large energy users, port capacity, energy storage, energy conversion technologies and strategic industrial land - should be promoted as a single spatial and infrastructure framework: a Shannon Estuary Green Energy Park delivered through SERA. This would position the Estuary as Ireland's leading clean energy and industrial decarbonisation cluster.

A Green Energy Park designation would unlock long-term economic and climate benefits by attracting foreign direct investment, anchoring supply-chain activity and supporting balanced regional growth in the Southern Region. International examples such as Eemshaven Energy and Hydrogen Hub in the Netherlands, the Port of Rotterdam Energy and Industrial Cluster, and Spanish net-zero industrial and green hydrogen park models demonstrate that major clean energy industrial clusters are typically coastal and port-led. Ports act as energy import and export gateways, industrial hubs and logistics platforms.

Shannon Foynes Port and the wider Estuary are therefore pivotally located to facilitate such a designation.

SERAI could support renewable-powered manufacturing; floating offshore wind supply-chain development; port infrastructure and marshalling capacity at Shannon Foynes; green hydrogen and biomethane production, storage and distribution; renewable-powered data and digital infrastructure; life sciences; advanced manufacturing; clean technology investment; logistics; aviation-linked enterprise; grid reinforcement; flexible demand solutions; industrial decarbonisation and electrification; activation of strategic enterprise lands; and skills, training and research capacity linked to regional institutions.

It is critical that the RSES commits to SERAI explicitly. Without a clear regional planning designation or implementation framework, the Shannon Estuary risks remaining an acknowledged opportunity rather than becoming a delivered national asset. The RSES is the appropriate spatial and economic policy instrument to connect national energy policy, RED III acceleration mechanisms, LEAP, enterprise strategy, port investment, grid planning, gas infrastructure, airport connectivity, skills development and local authority planning.

SERAI would also provide a practical mechanism to advance the objectives of the Shannon Estuary Economic Taskforce. The Taskforce identified the Estuary as a major national opportunity for renewable energy, industrial development and regional transformation. SERAI would turn that ambition into an actionable delivery model by coordinating the planning, energy, enterprise and infrastructure decisions needed to attract investment. This is essential to ensure that offshore renewable energy and clean industry generate long-term employment, supply-chain opportunities and value creation in the Mid-West and Southern Region, rather than simply exporting energy or allowing industrial value to accrue elsewhere.

Therefore, Limerick Chamber recommends the following action point: The RSES shall support the establishment of SERAI as a plan-led regional framework to coordinate renewable energy acceleration, Green Energy Park designation, large energy-user co-location, clean industrial development, port and grid investment, gas and energy security infrastructure, green hydrogen, biomethane, enterprise lands, skills and infrastructure delivery across the Shannon Estuary Region. SERAI shall build on the Estuary's existing strategic advantages, including available industrial land, 400 kV transmission infrastructure, proximity to national gas and electricity networks, Moneypoint, Tarbert, Ballylongford, Cahercon, Shannon Foynes Port, Shannon Airport, rail and road connectivity, established industrial activity and access to graduates, research and training capacity from regional education institutions. SERAI shall seek to align the opportunities arising from the Government's Large Energy User Action Plan, RED III Renewable Energy Acceleration Areas, the EU Green Deal, REPowerEU, the Clean Industrial Deal and the recommendations of the Shannon Estuary Economic Taskforce, with the objective of positioning the Shannon Estuary as Ireland's leading clean energy, Green Energy Park and industrial decarbonisation cluster.

It is therefore requested that the RSES put in place the necessary policy objectives and implementation mechanisms to enable identification of the Port of Foynes and the Shannon Estuary as a Green Energy Park delivered through SERAI. Given Ireland's limited capacity to accommodate a Green Energy Park of national scale, the Southern Regional Assembly now has an opportunity to place the Shannon Estuary at the forefront of Ireland's clean energy, energy security and industrial decarbonisation agenda.

Mobility and Transport

Transport as a Growth Enabler

Transport is one of the most important determinants of whether the Limerick–Shannon Metropolitan Area can meet its population, housing and employment targets. Limerick Chamber supports the objectives of LSMATS and BusConnects Limerick but emphasises that transport strategies must now move to funded delivery.

The RSES / LSMASP should clearly identify the capital projects required to support sustainable mobility and economic development, including:

- BusConnects Limerick implementation.
- Metropolitan rail expansion.
- Moyross Station delivery.
- Ballysimon Station planning and delivery.
- Colbert Station regeneration and interchange development.
- Limerick–Foynes rail line reinstatement and freight activation.
- Improved rail connectivity to Ennis, Galway, Cork and Waterford.
- Enhanced access to Shannon Airport.
- Strategic road upgrades including the N/M20 Cork–Limerick and N21/N69 connectivity.
- Active travel networks connecting homes, schools, workplaces and public transport.
- Park-and-ride facilities serving the metropolitan area.

Road Connectivity and Freight

While sustainable transport must be prioritised, the RSES should also recognise the importance of strategic road infrastructure for freight, port access, regional connectivity, enterprise and balanced development. Limerick's role as a regional economic hub depends on high-quality connections to Cork, Galway, Waterford, Shannon Airport, Shannon Foynes Port and the wider Atlantic Economic Corridor.

The RSES should support delivery of:

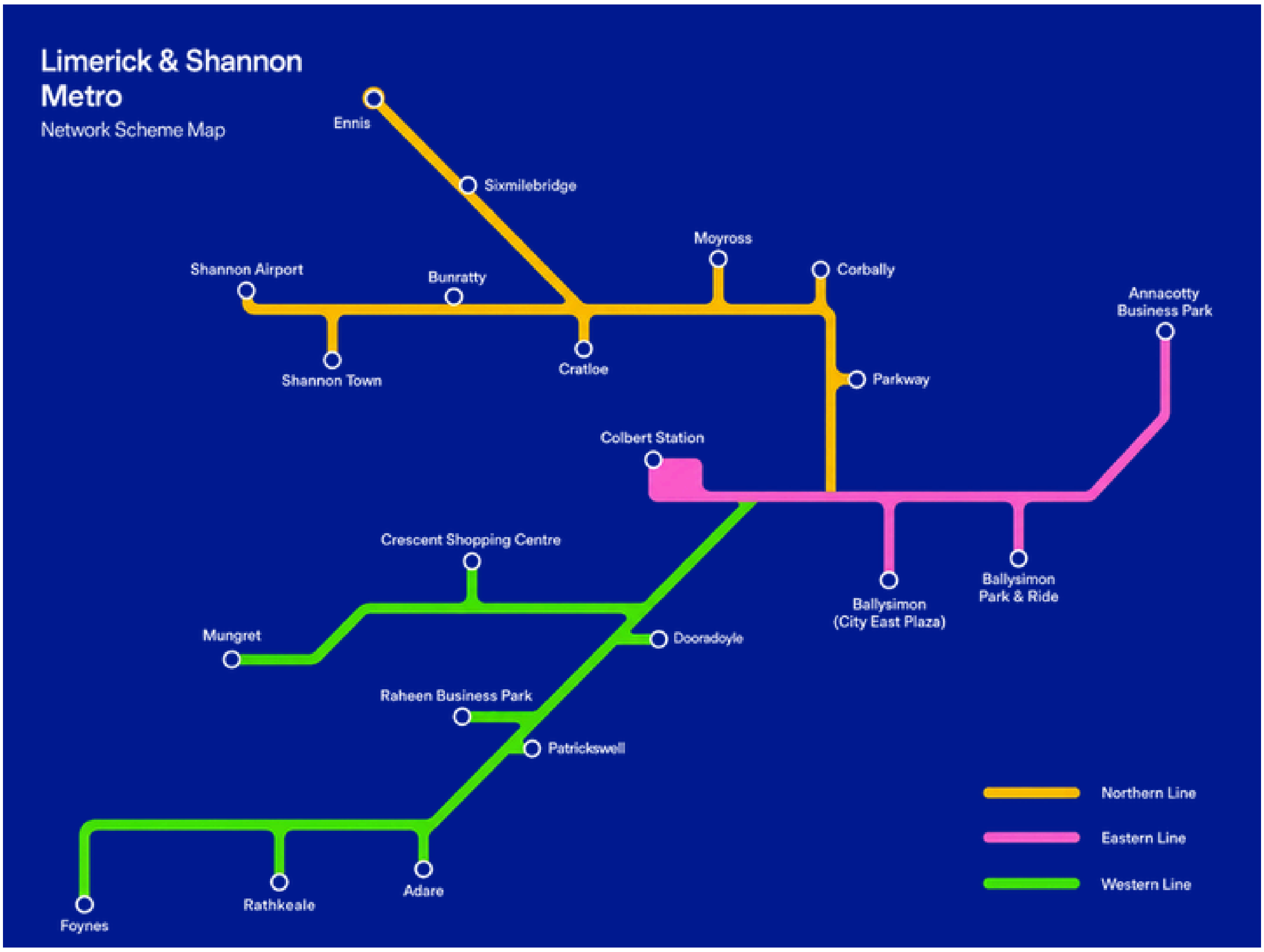
- N/M20 Cork–Limerick.
- N21/N69 Limerick–Foynes connectivity.
- Improved access to Shannon Airport.
- Strategic freight routes serving Shannon Foynes Port.
- Road improvements that remove bottlenecks and improve safety.

It must be noted that the track access charge for rail freight acts as a disincentive and drives more HGV traffic to roads. This must be reduced as part of Budget 2026, as per the findings of the All Island Strategic Rail Review.

Transport Oriented Development

Limerick has a significant opportunity to align housing delivery with rail and high-capacity public transport. The MASP should make Transport-Oriented Development (TOD) a central spatial policy and identify priority transport oriented development locations across the metropolitan area that align with metropolitan rail stops. Both the RSES and LSMASP should strongly reflect this view that we must now adapt spatial planning at a local and regional level to begin planning for mobility hubs bolstered with residential accommodation. The MASP should help to identify each TOD in the metropolitan area and encourage the implementation of a delivery framework identifying land assembly, zoning, density, infrastructure, viability, active travel, public realm and public transport requirements.

Metropolitan Rail



Both the RSES and MASP should outline a metropolitan rail network as crucial for reaching the economic development and population goals of Project Ireland 2040 and the NPF.

The metropolitan rail network will help to achieve

1) National Connectivity: Dual-tracking Colbert–Junction fulfils LSMATS and NTA commitments and removes a critical single-line bottleneck on the Dublin–Cork–Limerick spine

2) Balanced Growth: A commuter network underpins compact housing delivery, transport-oriented development, opening up lands of scale, labour mobility and Project Ireland 2040's Mid-West population targets

3) Climate & Competitiveness: A rail link cuts carbon-intensive car trips for commuters, supports enterprise and tourism, and enhances FDI appeal.

Overall, the focus of delivery on the metropolitan rail network should be to deliver a comprehensive Limerick-Shannon commuter rail network as illustrated above including:

- A critical aspect to connect Limerick Colbert Station to the Foynes Railway line and other prospective lines is to ensure that funding is secured to deliver a spur from the existing line into Colbert Station - this will allow Colbert Station to become a point on the line, rather than Limerick Junction.

- Dual-tracking the Limerick Colbert Limerick Junction - design, construction and signalling.

- Deliver ongoing stops along Northern, Eastern and Western lines. Including the conversion of the Foynes freight line to mixed passenger–freight use

- Advancing the Shannon Airport Rail Link to shovel-ready stage, in line with the All-Island Strategic Rail Review target year 2030.

Sustainable Transport

BusConnects

Limerick Chamber has long been a supporter of the Limerick BusConnects programme and its overall ambition to increase public transport for workers, residents and visitors. It is unconscionable that BusConnects Limerick may be delayed to 2028 and beyond with implementation to come after RSES and LSMASP.

Regardless of timelines, the RSES and MASP need to ensure that the region has adequately planned for the rollout of BusConnects and that Government delay in providing the funding does not negatively affect any economic development or spatial planning decisions by BusConnects rollout absence.

City Centre Mobility

As cities move towards a new modal shift, they will encounter challenges around access, it is important that the MASP begins to plan for these disruptions by ensuring that detailed city centre mobility plans are undertaken and within a set time period. Combined with this there needs to be adequate parking and delivery strategies undertaken for cities to ensure that access for businesses is not negatively disrupted. The Southern Regional Assembly and the MASP need to ensure that work is undertaken within a satisfactory time period to draft plans with regard to the above.

Parking and car access is seen by many business as critical to economic development of the city centre and other zones of populous, this is exacerbated by the delay of public transport programmes like BusConnects which has ensured that a slower modal shift will be present in Limerick until public transport provision becomes adequately funded. While Limerick Chamber realises that modal shift is required, care must also be deployed to ensure minimal disruption to those businesses who rely on car users for sales.

Park and Ride

Park-and-ride facilities are needed to support the growing number of work and student commuters, a demand that has increased significantly due to housing shortages. A priority facility should be provided on the Castletroy side of the city, in or around Mackey Roundabout, with additional facilities at key city-boundary entry points such as Coonagh, Mungret and other approaches. To ensure their effective use, these facilities should be supported by frequent, reliable shuttle services to major local schools, employers and higher education institutions.

RSES and LSMASP must support the planned park and rides by the National Transport Authority around Limerick. There are currently three bus based park and rides targeted for Limerick, with one rail based park and rides.

Sustainable Multimodal Logistics Hub

The RSES must plan for a sustainable multimodal national logistics hub in proximity to Foynes Port that connects the region to the rest of Ireland and beyond. This will allow sustainable economic development to be embedded into economic and logistics growth but will also help to address national challenges around balanced regional development, congestion, and decarbonisation. The introduction of such a hub directly supports Ireland’s Road Haulage Strategy 2022 - 2031 and Climate Action Plan, while addressing structural weaknesses in the national freight network.

This hub can be bolstered by existing infrastructure assets such as a Tier 1 and TEN-T corridor port in Shannon Foynes Port which over the next number of years will see significant road and rail upgrades. The region is also home to Shannon Airport and the use of such as part of the hub is consistent with National Aviation Policy and the development of freight.

Road Network

Mackey Roundabout & LNDR Phase 1

There will be a long-term requirement for the LNDR in Limerick as the city, its population and its universities continue to grow. It is anticipated that this will be linked to the east of the city near the Mackey Roundabout.

The urgent need is to improve safety and connectivity at the Mackey / Newport Roundabout, which links the M7 to city east including to the National Technology Park and University of Limerick. Congestion frequently builds back onto the motorway at the Dublin Road exit. A dedicated slip road to the Technology Park, alongside wider junction and road upgrades, is essential not only to protect safe and reliable journeys, but also to ensure that the park's continued enterprise development is not constrained. The LSMASP must support this objective.

N21 / N69 Foynes to Limerick

While works have now commenced on the Adare Bypass, it is essential that the RSES supports the remaining 26 km of the N21/N69 Foynes to Limerick Road Scheme, of which the Adare Bypass forms one part. The timely delivery of this road is vital to supporting the economic growth of Foynes Port and the wider West Limerick region. Its uncongested position on the national road network will be a major advantage in enabling port capacity expansion and the development of Energy infrastructure in the region.

N / M20 Limerick to Cork

The continued lack of urgency on the development of this road is deeply frustrating. The absence of a high-quality, direct road link between Ireland's second and third largest cities remains a major anomaly by European standards.
The delivery of the N/M20 will significantly improve connectivity and unlock substantial economic opportunity, this must be called out as a project of priority in the RSES.

Airport Access Roads

The RSES should support the prioritisation and delivery of

- the N19 Shannon Airport Access Road Improvement Scheme,
- forward planning for further N19 / M18 capacity and resilience improvements,
- upgrades to the R471 and relevant local routes including the L-3169

Shannon Airport

Shannon Airport should be explicitly recognised in the revised RSES and Limerick-Shannon Metropolitan Area Strategic Plan as strategic national infrastructure, critical to Ireland's international connectivity, economic competitiveness and aviation resilience. As the only long-haul capable airport outside Dublin, with the State's longest runway, significant uncongested capacity, a 2,100-acre landholding and the largest US Customs and Border Protection preclearance facility outside the Americas, Shannon provides a nationally important alternative airport function and a unique platform for trade, tourism, foreign direct investment and balanced regional development. Its role is not solely regional: Shannon provides essential redundancy within the State's aviation network and supports key growth sectors. To realise this potential, the RSES should provide clear policy support for the sustainable growth of Shannon Airport and should identify Shannon as a priority destination.

The RSES should also support high-quality, frequent and direct bus services between Shannon, Limerick City, TUS and UL, alongside stronger regional and inter-regional connectivity to Galway, Cork and other key centres. In addition, the Shannon Airport Rail Link, identified in the All-Island Strategic Rail Review, should be designated as a strategic national project. A rail connection would expand Shannon Airport's catchment, strengthen national and international accessibility, support transport-oriented development, reduce car dependency and align with climate, competitiveness and TEN-T objectives.

Creative and Innovative Region

Enterprise Development

Enterprise & Innovation

The RSES should explicitly link enterprise growth to infrastructure delivery. Limerick and the Mid-West have strong enterprise assets, including multinational investment, indigenous exporters, higher education institutions, research capability, tourism, logistics, advanced manufacturing, aviation, life sciences, professional services and renewable energy potential.
However, enterprise growth depends on enabling infrastructure. The RSES should therefore integrate enterprise policy with housing, transport, energy, water services, digital connectivity and skills.

Limerick Chamber recommends that the RSES support:

- Strategic employment locations with transport and utilities capacity.
- Expansion of enterprise lands where infrastructure can support delivery.
- Landbanking of enterprise lands to ensure the future delivery of a variety of size of business parks
- Stronger links between higher education, skills and industrial opportunity.
- Indigenous business scaling supports.
- Offshore wind and green enterprise supply-chain development.
- Aviation, logistics and port-related enterprise clusters.
- City-centre enterprise and commercial vacancy activation.

Shannon Airport Business Park

Shannon Airport Business Park is the largest business park outside Dublin and a key national asset for balanced regional development. Together with Shannon Airport, it forms a major employment hub, attracting around 10,000 workers daily and supporting a daytime population in Shannon of approximately 18,000.

The Business Park has a diverse and resilient employment base across financial services, aircraft leasing, aviation MRO, life sciences, medtech, advanced manufacturing, logistics, supply chain and ICT. This mix strengthens Shannon’s role as a centre for innovation, export-led enterprise and international connectivity.

Recent investments by companies such as Mbryonics and Frontier Scientific Solutions demonstrate Shannon’s continued appeal for high-value, knowledge-intensive activity, including space technology and temperature-controlled pharmaceutical logistics. These developments highlight Shannon’s potential as a strategic gateway between Europe and the United States for advanced industries and high-value medical products.

With 1.3m sq. ft of commercial space and 482 acres of land, including 130 acres in the East Business Park capable of supporting a further 1.5m sq. ft, Shannon has significant capacity for growth.

The RSES and LSMASP should explicitly recognise the national importance of Shannon Airport Business Park and ensure that planning, transport and infrastructure investment support its continued expansion and evolution.

Higher Education, Skills & Talent

The further and higher education institutions located in the region are major national and regional assets. The RSES should support their expansion and integration with the city and wider region.

The MASP should include stronger spatial and transport links between higher education campuses, the city centre, strategic employment locations and residential growth areas.

Skills planning should be aligned with the region's capital investment priorities, particularly housing, construction, energy, advanced manufacturing, ICT and the digital economy, logistics, aviation, healthcare and tourism.

Education & Research Support

The RSES and Limerick–Shannon MASP should recognise Higher Education Institutions as core regional infrastructure, central to skills development, research capacity, innovation, enterprise growth and balanced regional development. Delivery of the MASP's population and economic ambitions will depend not only on housing, transport and utilities, but also on sustained investment in education and skills systems.

The region's Higher Education Institutions have a critical role in supporting enterprise needs, lifelong learning and workforce transformation. The skills challenge is increasingly shifting from initial graduate supply to continuous upskilling, requiring flexible, modular and employer-aligned learning pathways, supported by blended and digitally enabled delivery models.

The RSES should therefore support investment in higher education capacity, research and innovation infrastructure, and industry collaboration ecosystems. This should include stronger employer–HEI collaboration, co-investment models, greater SME participation, improved supports for part-time and working learners, and the continued development of city-of-learning networks.

Education and research provision must also be integrated with wider metropolitan planning. Improved transport links between campuses, the city centre, Shannon, employment locations and the hospital network will be essential to supporting students, staff, researchers and enterprise collaboration. Investment in BusConnects, commuter rail, active travel, park-and-ride and Shannon Airport connectivity should therefore be viewed as enabling infrastructure for the education and innovation system.

The RSES shall support the expansion of higher education, research and innovation capacity across the Limerick–Shannon Metropolitan Area, recognising Higher Education Institutions as key enablers of regional competitiveness, enterprise growth and balanced national development. This shall include investment in lifelong learning, flexible and employer-aligned skills pathways, research infrastructure, industry collaboration, SME engagement and transport connectivity between campuses, the city centre, Shannon, employment locations and key public services.

Limerick Chamber

Advancing business together

www.limerickchamber.ie