



**Shannon
Chamber**
Advancing business together

Draft Revised National Planning Framework

July 2024

SHANNON CHAMBER SUBMISSION

September 2024

Introduction

Shannon Chamber welcomes the opportunity to submit comments on the Draft Revised National Planning Framework; however, as we only became aware of the opportunity to comment on same yesterday (11 September), our commentary will not be as comprehensive as we would wish. In this context, we would value being alerted when such public consultations arise in the future, as we pride ourselves in being proactive in our contributions to national policy.

Given the time constraints placed on us to review the document in detail, we will limit our comments to issues most pertinent to Shannon and the wider Limerick Shannon Metropolitan Area, particularly:

1. The Atlantic Economic Corridor
2. Limerick City and Metropolitan Area
3. Limerick Northern Distributor Road

1. The Atlantic Economic Corridor

We welcome the continued reference to the Atlantic Economic Corridor AEC in the latest draft of the NPF, and the reference to digital hubs, but, as in a previous submission made directly by the AEC in November 2017, we would emphasise that the AEC is more than a transport corridor and the hubs are but one part of the property solutions for business previously proposed by the AEC task force. It is essential that the untapped potential of the AEC regions is realised; this can only be achieved by putting the key enablers in place in a holistic way.

We would reiterate the point made in previous submissions to the NPF that the AEC strategy of February 2016 set out the objective of an Atlantic Economic Corridor – the creation of a ‘city of scale’ from Limerick through Galway to Sligo, to match Dublin and Cork in success in developing infrastructure, attracting Irish and multi-national investment, and growing jobs and wealth in vibrant communities. This objective was recognised in the Programme for Government with a commitment to the development of a new Atlantic Economic Corridor and the establishment in March 2017 of the AEC Task Force.

Accepting that reference is made to the AEC in the revised draft, and a case study is included, we feel, however, that this lacks strategic context.

AEC Submission to NPF March 2017

The AEC provided a detailed submission as part of the NPF consultation process. This recognised and agreed that a strong country needs a strong capital, strong regions and strong tier two cities. However, the AEC argued strongly that promotion of one or more of the four regional cities is just one part of the required long-term and transformational growth. A key point that underpins the AEC is that we want to build on the strengths of the AEC cities and larger urban centres but also **connect them and reinforce the links between them and rural areas.**

Concerns put forward previously are still relevant:

- Firstly, the opportunity for a North-West City Region has the potential to create a series of linked cities along the Atlantic Corridor.

- Secondly, enhanced regional accessibility should not have to wait for mobilisation of core areas as accessibility is an enabler of this goal.
- Thirdly, there is also a critical missing piece, **Regional Linkage**. If we are to avoid replicating in other cities the mistakes of concentrating decades of our country's growth in Dublin, we must ensure that these smart growth centres are actively engaged in the kind of co-operation and actions that will not just build on their strengths but also connect and reinforce their links to one another and their surrounding areas.

This requires the formal recognition of the Atlantic Economic Corridor as a key element and outcome of the NPF. This means **designating the Atlantic Corridor as a strategic development zone**. Something similar has happened with the Greater Dublin Area (GDA) with all local, regional, national authorities as well as state agencies formally co-ordinated and integrated in pursuit of the development of the strategic zone. Government and its agencies must show they are acting in a fully integrated manner.

In making these comments, we also reference other submissions also made by Shannon Chamber on behalf of the AEC – to the NDP and the National Resilience Plan – which also called for a stronger commitment to the AEC vision and required actions. (Copies of these submission can be forwarded on request)

2. Limerick City and Metropolitan Area

We refer to the section on P46 titled: **Limerick City and Metropolitan Area**, and referenced throughout the document, and express our concern that this is not in line with the inclusion of Shannon in other Plans such as the **Limerick-Shannon Metropolitan Area Transport Strategy**.

Limerick -Shannon Metropolitan Area is embedded in other strategic reports such as The Regional Spatial and Economic Strategy (RSES), demonstrating strong regional policy and acknowledgement for the growth potential that Shannon and Shannon Airport offer to the wider region. Why therefore does this document only focus on Limerick and the Limerick city area. The economic contribution in terms of jobs and economic value that Shannon offers should not be overlooked.

Our review of the document points to a lack of recognition for the fact that Shannon is part of the Limerick-Shannon Metropolitan Area. We accept that brief mention is made of Limerick-Shannon's strengths, but this is based around the airport, with zero recognition of the Shannon industrial cluster and its contribution to local, regional and national economic growth let alone Shannon the living town.

Shannon is more than a town – it is the sum of three sets of economic activity – Shannon, the Airport; Shannon Free Zone; Shannon, a Living Town – three key components that, when combined with Limerick, Ennis and Galway, create a key strength at the core of the AEC.

Shannon's strategic positioning as the gateway to the region should not be overlooked. Our question therefore is: Why is Shannon not included in this section of the Revised NPF, given its strategic positioning?

We would refer also to the fact that Planning policy across the EU is focused on developing metropolitan areas and in the context of this document, we recommend therefore that Shannon is included in the Limerick-Shannon Metropolitan Area.

3. Limerick Northern Distributor Road

As referenced in our Submission to the Limerick-Shannon Metropolitan Area Transport Strategy, one of the key attractors of investors and visitors to regional locations is the lack of congestion compared to that naturally occurring on Ireland's east coast, particularly around Dublin city and neighbouring counties and the delays such congestion causes.

In that submission, we welcomed the proposal to construct the Limerick Northern Distributor Road and the many positive factors that would result from the delivery of this critical piece of road infrastructure, namely:

- It would alleviate the traffic congestion that is evident around Limerick, Plassey and current access points to the National Technology Park
- It would provide access to the proposed new Clare-sided entrance to the University of Limerick and make access to UL easier and faster from Clare and encourage greater linkages between academia and Shannon-based companies
- It would reduce cross-city traffic and alleviate associated congestion
- It would contribute greatly to the delivery of a Strategic Development Zone around Clonlara, Co Clare and enable the development of much-needed student accommodation in Clare, to accommodate an increase in student numbers at the University of Limerick. (We would also recommend that provision is made in the Revised Draft for the UL Strategic Zone given the positive impact it will have on the region)
- It would relieve congestion, particularly at peak times, of traffic emanating from Shannon travelling north-east.

Given the Government's focus on sustainability and the reduction of traffic-related carbon emissions, we were disappointed when work ceased on the construction of this key piece of infrastructure for the region.

Delivery of all phases of this critical piece of orbital infrastructure is strongly recommended by Shannon Chamber for inclusion in the Draft Revised National Planning Framework as it will take connectivity between Limerick and Clare to a new level.

Conclusion

We reiterate the point made in the introduction to this submission. Given the numerous submissions made by Shannon Chamber, not just to the first draft of the NPF but to subsequent and related documents (RSES, LSMATS, NDP, Local Area Plans), we are disappointed that we were not alerted directly on this latest call for submissions. The points made herein relate solely to areas we are familiar with in the document and are not linked to a comprehensive review of the entire 'Revised Draft', due to time limitations.

We refer to our comments following the publication of the first draft NPF when we recognised that the clear message emanating from the National Planning Framework (NPF) was the Government's intent to create realistic alternatives to Dublin.

We welcomed the inclusion of the Atlantic Economic Corridor (AEC) initiative in the NPF and the fact that the NPF was setting out to empower each region to chart its development. We made the point, which we reiterate again in this commentary, that the next set of strategies must look beyond administrative boundaries, recognise economic zones of influence and see, for example, Shannon as

an economic engine in its own right but also a core part of the Limerick/Shannon/Ennis/Galway Atlantic Economic Corridor.

We welcomed the reference to the metropolitan area strategic plans (MASPs) in the NPF and the fact that Shannon, through the airport, industrial/business clusters and the town, will be a contributor to the Limerick area MASP. This is not evident in this Revised Draft.

Shannon, with a special economic zone, an international airport, an enterprise hub and a living town, generates economic impact far beyond that of towns of a comparable size. It is Ireland's first and only new town of the 20th century; has a population of greater than 10,000 people with a diverse, multi-cultural and strong community. 10,000 people work in the industrial, airport and commercial zones meaning that the average 'working' population of the town on a typical working day is close to 20,000.

Shannon has the largest Foreign Direct Investment (FDI) cluster outside Dublin with 120+ companies generating circa €4bn in merchandise exports with international services exports additional to this. It generates €15m, or 38%, of annual local authority rates income in Clare and, It serves as the international gateway to the Atlantic Economic Corridor and Ireland's Wild Atlantic Way.

We trust therefore that the points made in this latest submission are given due regard.

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