

Review of the National Development Plan

Shannon Chamber Submission June 2025

Introduction

Having inputted a submission to the Draft Revised National Planning Framework July 2024 and to the Review of the National Development Plan 2021, Shannon Chamber welcomes the opportunity to, once again, input to this current Review of the National Development Plan.

We do so, as an individual Chamber within the national Chambers Ireland network. While concurring with the commentary contained in Chambers Ireland's submission, particularly regarding infrastructure, housing, regional connectivity, flood defences, offshore wind potential and balanced regional development, our submission takes account of the concerns of our board and members, now numbering 330 companies from diverse sectors.

Reviewing our submission to the July 2024 Draft NPF, the following arguments still apply:

A strong country needs a strong capital, strong regions and strong tier two cities. However, promotion of one or more of the four regional cities is just one part of the required long-term and transformational growth. While the strengths of regional cities and larger urban centres need to be built upon, they also need to be connected and linked to rural areas.

Our concerns put forward previously are still relevant:

- 1. There is potential to create a series of linked cities along the Atlantic Economic Corridor
- 2. **Enhanced regional accessibility** should not have to wait for growth of core cities as accessibility is an enabler of this goal.
- 3. There is also a critical missing piece:

Regional Linkage. To avoid replicating in other cities the mistakes of concentrating decades of Ireland's growth in Dublin, it is imperative that the NPF's 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.

The absence of an overarching economic plan for the country is evident in the lack of progress made in the following areas:

- offshore wind in the Shannon Estuary and western seaboard where wind is strongest
- increasing concentration of air access in Dublin while regional international airports
 have capacity
- delays in critical infrastructure roads, water and energy

An overarching statement of an economic vision for the whole country based on the realisation of underused comparative advantage that exists in the regions is therefore critical when reviewing the National Development Plan.

We expand further on several key issues, taking account of the questions raised in this public consultation.

1. Transport and Connectivity

Regional Airports Programme

Shannon Chamebr concurs with Chambers Ireland's view that airports must be integrated into national connectivity strategies, but we further emphasise, as we have done in our submission to the 'Programme for Government', the need for the inclusion of regional airports, including Shannon Airport, in the Regional Airports Programme, which is due for review.

We have continually called on Government to honour its pledge for balanced regional development through undertaking a **review of the National Aviation Policy** as we believe that Shannon and the region can deliver a lot more, to a lot more companies and overseas visitors, if there is a strategic shift in how we distribute air traffic across all state airports.

To achieve the vision and ambitions of Project Ireland 2040 and the National Planning Framework (NPF) of ensuring an equitable distribution of economic growth in Ireland, there is a need to put in place a policy environment which promotes regional air traffic distribution by the development of policies that encourage a more even distribution of air traffic into the regions.

A diversified Airport network would ensure that the country can effectively withstand unexpected events such as natural disasters, cyberattacks, or other disruptions to the transport system. By strengthening the role of the regional airports, such as Shannon Airport, Government can safeguard national connectivity and economic stability while ensuring flexibility in the transport infrastructure.

Under European Commission regulations, airports with fewer than three million passengers are eligible for capital expenditure support, underlining the need for targeted investment to optimise airport infrastructure and service provision.

State-owned airports, including Shannon Airport, should be included in the Regional Airports Programme by **raising the threshold to 3 million passengers** ensuring equitable support for all of Ireland's regional airports.

Including Shannon Airport in the Regional Airports Programme would enable it to enhance its infrastructure, advance its sustainability initiatives, and develop new route connections.

Our request to Government in drafting the NDP:

- Honour the commitment in the Programme for Government to develop a new Regional Airports Programme 2026- 2030, and include State-owned regional airports, and
- Conduct a review of National Aviation Policy to maximise the use of the airports in the regions.

Shannon Airport Rail Link

Shannon Chamber is an active contributor to discussions re the enhancement of the Shannon Airport N19 Road Access Scheme, which is now considering the inclusion of a **rail link to Shannon Airport.**

As the Shannon Airport Rail Link has been designated a short-term objective in the All-Island Strategic Rail Review - with a target delivery by 2030, pending funding and proper evaluation - its inclusion in the National Development Plan (NDP) budget is essential to ensure it advances through planning, design, and construction stages. It would be inconceivable to develop a new road system without simultaneously providing for the infrastructure needed to support a future rail connection to the airport.

Investing in public transport infrastructure that connects Shannon Airport to the broader region is essential for economic growth. Developing a dedicated rail link to Shannon Airport is vital to enhancing access for commuters, businesses, and Shannon's workforce. Improving this transportation corridor will boost regional productivity, lower commuting costs, and strengthen the competitive advantage of Shannon and its neighboring areas.

The inclusion of the Shannon Airport Rail Link in Package 1—Short Term and Decarbonisation—of the All-Island Strategic Rail Review marks an important move toward fulfilling several core goals set out in Project Ireland 2040. This initiative aligns closely with national policy priorities such as promoting economic growth, advancing environmental sustainability, and ensuring balanced regional development. By enabling more efficient transport, decreasing dependence on carbon-heavy travel, and encouraging investment, the rail link promises substantial long-term economic benefits.

A fast and dependable rail link between Limerick and Shannon Airport is more than just an infrastructure upgrade - it is a driver of economic transformation. This connection has the potential to open new business opportunities, enhance transport efficiency, and promote sustainability, all while supporting broader economic development throughout the region.

Our request to Government in drafting the NDP:

 Prioritise the development of reliable transport infrastructure, including setting a timeline for the development and delivery of a direct rail connection to Shannon Airport.

2. URDF Funding

The **Urban Regeneration and Development Fund (URDF)** has delivered a range of tangible benefits across Ireland since its launch in 2018. As part of Project Ireland 2040, the Fund has supported the regeneration and sustainable development of Ireland's cities and large towns through funding projects that have enhanced the liveability of urban centres, such as pedestrianisation, plaza development, and streetscape upgrades. By improving urban environments, URDF projects have made towns and cities more attractive for investment, tourism, and enterprise growth.

Shannon Chamber was most disappointed to discover, in the latter part of the 2024, that URDF funding, which was earmarked by Clare County Council as the funding source for the delivery of phase one of the Shannon Town Centre Masterplan – the OneShannonHub – was almost exhausted and that no provision for renewing it was made in Budget 2025.

Given the benefits and economic payback that URDF funding has provided to the economy, provision for its continuation, or a similar type of fund, should be incorporated into the NDP to revitalise towns such as Shannon.

Our request to Government in drafting the NDP:

 Restore URDF or a comparable funding mechanism to support the implementation of development plans in towns like Shannon, which play a key role in the State's economic growth.

3. Housing / Infrastructure

Ireland faces a severe housing crisis, with soaring prices and limited availability. The lack of key infrastructure to support the construction of delivery of housing stock is a major inhibitor. Investing in housing and infrastructure would increase economic productivity from better mobility and lower rent pressure. It would also boost construction employment and local economics. Lack of housing is impacting companies' recruitment and retention of talent.

Our request to Government in drafting the NDP:

Tackle the obstacles to housing infrastructure development by:

- o Increasing the availability of land for residential use, and
- Removing barriers to construction, such as the shortage of serviced and zoned land.

4. Offshore Wind Potential

We concur with Chambers Ireland comment that offshore wind potential remains underutilised throughout the State.

Speed is of the essence in developing a floating offshore wind sector as Ireland is 5+ years behind and falling behind by the day. Floating offshore wind is vital, not only for meeting our energy targets but for providing a reliable, clean, and abundant source of power. The benefits go well beyond the environmental gains through bringing substantial economic opportunities to local coastal communities, creating jobs, boosting local industry, and revitalising ports and infrastructure.

Government must start looking beyond the 2030, 2040 or 2050 targets, focusing instead on the benefits that will accrue in one hundred years' time.

Partnership between Government and industry is essential. With competition in many countries, particularly Korea and Japan, Ireland needs to get investor interest back for the sector to be successfully deployed.

The west coast of Ireland, which experiences some of the strongest and most consistent wind speeds in European, due to its exposure to the Atlantic Ocean, presents the ideal environment for harnessing energy.

Our request to Government in drafting the NDP:

- Ensure sufficient funding and resources are dedicated to developing the Floating Offshore Wind Sector, capitalising on the high wind speeds along Ireland's west coast.
- Ensure that public and private enterprises, research institutions and skilled workers across the Atlantic Economic Corridor are embedded in the offshore wind value chain by accelerating investment in enabling marine area plans and infrastructure.

5. Flood Defences

Investment is Ireland's flood defences are not only essential but extremely urgent.

Our consultation with the design team for the Shannon Town and Environs Flood Relief Scheme, which we note, may not be delivered until earliest 2034, has given us an in-depth appreciation for the urgency of investment in Ireland's flood defences.

For example, research at Maynooth University's ICARUS Climate Research Centre highlights the need for climate adaptation measures particularly in flood protection. The outcome of this research highlights that the risk is increasing day by day of a breach or over-topping of the embankments currently protecting Shannon. The research also stated that, on average, rainfall intensity in Ireland is increasing at a rate of 8.2% per degree of global warming.

The most recent report from NUIG has greatly concerned our members. They were aghast to note that had the surges from Storm Eowyn occurred a week earlier during the high-water spring tide, the water levels would have been much higher – with data predicting that the water level at Galway Port would have reached 4.96m, Limerick Dock at 5.85m, and **Shannon Airport at 5.43m above average sea level** – inundating the areas. An event, with similar impact to Storm Eowyn, would adversely affect their ability to serve their customers around the world, due to the risk of flooding associated with a tidal wave.

Flood maps of Shannon illustrate that the airport, industrial and living areas of Shannon will be inundated following a breach. This area has a living population of 10,000, which rises to 20,000 daily as people come to work in the airport and businesses located in Shannon's industrial and business parks.

A Breach in the Embankments will have Local, Regional and National Economic Impact.

Analysis published by Oxford Economics in September 2023 on behalf of Shannon Airport Group highlights the economic impact of Shannon. In addition to the core economic footprint, the flights that Shannon Airport provides boost Ireland's long-term economic potential. The contribution of Shannon-facilitated tourism to Irish GDP in 2022 was €146m / 1,900 jobs.

Flights to and from Shannon Airport brought approximately 17,200 tonnes of imports and exports to and from Ireland in 2022, with an estimated combined worth of approximately €13.3 billion.

Shannon Chamber welcomes the fact that work on the Shannon Flood Relief scheme is underway but urges acceleration in timescale from design to implementation.

Our request to Government in drafting the NDP:

 That the timescale from design to delivery of Ireland's flood defences, particularly the Shannon Town and Environs Flood Relief Scheme, be accelerated. - A breach in the embankments will immediately impact Shannon Airport, Industrial Parks and Town

Accountability

We reiterate the point made by Chambers Ireland that accountability is essential to the delivery of the National Development Plan.

All plans require:

- 1. An Action Plan
- 2. Responsibilities
- 3. Timelines
- 4. Deliverables

The National Development Plan must produce concrete outcomes and successfully achieve its intended objectives.

All government departments should work together to achieve a unified purpose—a shared vision of economic progress for the entire nation.

Shannon Chamber provides this commentary in addition to responding to the questions posed in the consultation.

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