

DRAFT REGIONAL AND SPATIAL ECONOMIC STRATEGY

FOR THE SOUTHERN REGION



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

ELECTED MEMBERS' DRAFT SUBMISSION

FOR DISCUSSION AT SPECIAL MEETING

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Contents

Introduction	3
Chapter 1: Introduction	3
Chapter 2: Strategic Vision	3
Chapter 3: People and Places	4
-Limerick Shannon MASP:	4
-Towns and Villages:.....	6
-Newcastle West:	7
-Rural Areas:.....	7
-Networks:.....	8
Chapter 4: A Strong Economy	8
Chapter 5: Environment	9
Chapter 6: Connectivity	9
Chapter 7: Quality of Life	10
Chapter 8: Water & Energy Utilities	11
Chapter 9: Implementation, Monitoring & Evaluation	11
Appendix 2	12
Conclusion	12

Introduction

The Elected Members of Limerick City and County Council welcome the publication of a Draft Regional and Spatial Economic Strategy (RSES) for the Southern Region by the Southern Regional Assembly and the opportunity to make a submission. The Elected Members would like to acknowledge the extensive work undertaken by the Elected Members and Executive of the Southern Regional Assembly in the preparation of the Draft RSES.

The importance of the RSES in supporting the implementation of the National Planning Framework (NPF) and setting out a policy framework for development, growth and investment in the Southern Region over the next 12 years is acknowledged. Our responsibility to implement the RSES at County level through the adoption of a new City and County Development Plan, Local Area Plans and Local Economic and Community Plans etc. for Limerick is also acknowledged.

This submission sequentially follows the chapters of the Draft RSES document and aims to highlight the issues that are respectfully requested to be addressed in the finalisation of the RSES and Limerick Shannon Metropolitan Area Spatial Plan documents.

Chapter 1: Introduction

The Draft RSES fails to set out a clear strategic and co-ordinated approach for the future growth and development of and investment in Limerick. Limerick has ambitious plans as set out under the Limerick 2030 Economic and Spatial Plan.

Chapter 2: Strategic Vision

The scale and potential of Cork to contribute to the development of the Southern Region is acknowledged. However, Limerick also has the potential to become a city of scale as envisaged in the National Planning Framework (NPF) and contribute substantially to balanced regional development. In this regard, it is considered that the status and importance of Cork is over emphasised throughout the document. In particular, in setting out the strategy for the Southern Region the language utilised emphasises the status of Cork over and above that of Limerick and Waterford. For example:

- *“A key component of the strategy is to strengthen the settlement structure of the Region, to capitalise on the individual and combined strengths of our three cities, our metropolitan areas, and our strong network of towns. Cork the State’s second city and the largest urban settlement in the Southern Region has a 2016 population of 208,669 (city and suburbs) and recorded over 102,000 jobs” (pg. 21)*
- *“Cork is emerging as an international centre of scale and is well placed to complement Dublin, but requires significantly accelerated and urban focused growth to more fully achieve this role” (pg. 21)*

- *“Graced with three cities of regional and international significance, including the State’s second largest city” (pg. 80)*
- *“The Cork Metropolitan Area is uniquely positioned to be...The principal complimentary location to Dublin with strong international role...A primary driver of economic and population growth in the Southern Region” (pg. 209).*

As set out under the NPF Limerick (and Waterford) is on the same level of the settlement hierarchy as Cork and should be given equal weight in terms of importance and status in the final RSES. A suitable balance is required in terms of the growth of the three cities of Cork, Limerick and Waterford in order to facilitate the sustainable growth of the entire Southern Region.

Chapter 3: People and Places

Recognition that there is an additional housing requirement for social housing demand (Rebuilding Ireland) in the Draft RSES, which will have a positive impact on zoning requirements is welcomed. In this regard, the Draft RSES outlines that *“additional housing will also be required to cater for existing population requirements including social housing demand”*. This additional headroom allowance should be flexible in line with the changing demands of social housing profiles. The allowance must include reference to concealed households as this will be a significant generator of additional housing accommodating existing (backlog demand) and future households.

In order to plan for additional housing demand all sectors of society need to be considered. In this regard, the aging population and increase in the number of single person households, which results in the necessity to provide alternative housing types and tenures should be considered. In addition, given the significant third level student population in Limerick, it is considered that the housing demand requirement should also account for the substantial student population in the city. An additional zoning allowance should therefore be permitted for student accommodation.

The guiding principles set out for the allocation of future growth in Core Strategies is welcomed (pg. 30). However, the content of point two of the guiding principles which states *“the extent to which a settlement is located inside or outside one of the three defined City Region catchments”* is unclear. In this regard, further guidance is required as to whether growth in these settlements is to be progressed, focused or restricted etc..

-Limerick Shannon MASP:

The preparation of a MASP for Limerick Shannon should enable a clear strategic and co-ordinated approach to be undertaken to facilitate future growth, development and investment of the Metropolitan area.

The introduction (pg. 36) to the Limerick Shannon MASP states that *“Limerick City is the largest urban centre in Ireland’s Mid-West and the country’s third largest city. Shannon is a*

significant employment centre with assets such as Shannon International Airport, Shannon Free Zone and the International Aviation Services Centre (IASC). Both Limerick City and Shannon are interdependent upon each other, with their complementary functions contributing to a combined strength which is a key economic driver for the Southern Region and Ireland". This introduction is too weak in relation to Limerick City and undermines the primacy of the city. This issue is particularly evident in relation to the phrasing regarding employment. In this respect, it should be noted that there are approximately 45,000 jobs within Limerick City, compared to the 10,000 jobs in Shannon.

While the lack of emphasis on the primacy of Limerick City is of concern, the importance of synergies/integral linkages between the two areas of Limerick and Shannon is recognised, particularly the key asset of Shannon Airport. However, when transposing the RSES into the Limerick City and County Development Plan, the Elected Members envisage that the primary focus of growth should be on Limerick City, followed by the Metropolitan Settlement of Shannon. In this regard, the NPF states that *"it is necessary for Limerick to further strengthen its position as the principal focus within the Region and to continue to address the legacy of regional growth having occurred outside the City area"* (pg. 50).

Further to the above, with respect to the proposed Strategic Development Zone (SDZ), the sequential approach to development should be pursued in the first instance with the development of the city centre prioritised. This sequential pattern of growth is clearly a requirement of the *"Key future planning and development and place-making policy priorities"* for the region in the NPF (pg. 47). Therefore any proposal for an SDZ should take place in a phased and integrated manner following compact growth, consolidation and revitalisation of the city centre in accordance with the basic principles of the NPF and the Limerick 2030 Vision. In this regard, the NPF clearly references *"rejuvenation focused city development, with a special emphasis on capitalising on the potential of underutilised and publicly owned and centrally located sites and their potential to boost the population and economic output levels of city centre areas as drivers for wider regions"* (pg. 47). While Limerick 2030 envisages that *"the City Centre will be at the heart of the economic force – an attractive magnet for retail, leisure, residential, commercial, educational and cultural growth"*. Having regard to the above, the inclusion of a proposed SDZ within this 12-year strategy is considered premature and reference to same should be removed. Given the significant capacity of the city centre infill and brownfield lands and environs for compact growth to cater for residential and employment development, consistent with the requirements of the NPF, the importance and scale of Limerick City in a regional context should be re-balanced in the language of the MASP.

The following additional National Enablers for Limerick are requested to be included:

- **City Centre Revitalisation** based on Limerick 2030, comprising social, physical and economic regeneration and formation of a higher density Georgian Living City with all essential services and community facilities.
- Opportunity for creation of a **Carbon Neutral City**.
- **Industry 4.0**, Digital transformation and Smart City initiatives.

- **Climate resilience** (CFRAM defences).
- **Public realm projects** including the World Class Waterfront project.

Other key attributes of Limerick not included in the Draft RSES and requiring recognition are Thomand Park, the Milk Market and King John's Castle (referred to as "St. John's Castle in the Draft RSES).

The introduction to the Cork MASP states that this city is "*supported by a network of metropolitan towns and strategic employment locations*". Such metropolitan towns are indicated on the Cork MASP Plan, however it is noted that no similar Metropolitan towns are identified for the city of Limerick. Clarity is required in relation to the function and envisaged scale of the Metropolitan towns within the MASP.

With respect to connectivity, investment in public transport, walking and cycling links between Limerick and Shannon would enhance the attractiveness of the overall settlement to potential inward investment. Further to these assets, the lack of emphasis on the third level educational providers within the Metropolitan area and their importance in a regional context is of concern.

The strategy correctly states that the "*Limerick Regeneration Framework Implementation Plan*" is scheduled to be completed by 2023. However, there is a need for a long-term commitment to support continued social and economic regeneration of the most deprived areas in the city. In this regard, an additional policy objective is required to ensure the integration of these areas into the main stream social, economic and community life of the city.

Concerns are raised regarding the lack of RPOs for climate action/resilience and flood risk management specifically for Limerick. Proposals for a Climate Resilient City are noted, however a lack of associated actions have been identified. In this regard, proposals are in train for CFRAM defences and should be supported by an RPO.

The extent of existing and potential for new green infrastructure in Limerick, which is of benefit to place making, the health of communities and biodiversity requires recognition and support by way of an RPO.

-Towns and Villages:

With respect to Towns and Villages the initiatives to enable renewal are welcomed. However, clarification is required with respect to the "*New Homes in Small Towns and Villages*" initiative. In this regard, the meaning of and proposals for this initiative are unclear. The indicated infrastructural requirements are very much physical development focused. However, strategies are absent in relation to digital access/broadband, libraries, health and education, community spaces and hubs to facilitate sharing of infrastructure and use by for example Men's Sheds.

-Newcastle West:

The inclusion of Newcastle West as a Key Town in the Southern Region is welcomed. The importance of the Atlantic Economic Corridor (AEC) initiative to the town of Newcastle West is significant. An enterprise strategy will be developed for Newcastle West in order to realise the full potential of the town's enterprise assets to support job creation, improve competitiveness, attract investment and create future economic growth. This will enable opportunities for Foreign Direct Investment and indigenous businesses to establish, innovate and grow across a range of key sectors. In this regard, sufficient emphasis must be placed on this initiative in the introduction, attributes and RPO for this key town, in a manner similar to that provided for Tralee. In addition, the following further attributes, infrastructure requirements and policy objective should be included for the key town as follows:

- **Attributes:** Proven track record for investment, strong employment base, potential for residential development, Training and Education, Health Services Centre, Existing tourism investment (Desmond Hall, Castle Demesne Park) potential for community level Energy Plans.
- **Infrastructural Requirements:** Health and education, regeneration of the town centre, broadband, redevelopment of the library, provision of rural transport links, delivery of additional economic development lands, development of a Regional Athletics Hub.
- **RPO 17:** It is an objective to:
 - c. Support the initiatives of Newcastle West Atlantic Economic Corridor to realise the full potential of the town's enterprise assets to support job creation, improve competitiveness, attract investment and create future economic growth.
 - d. Identify opportunities for investment in incubation and innovation infrastructure for ICT and related companies and capitalise on Newcastle West's ability to accommodate remote working, enterprise start-ups and up scaling companies.
 - e. Support and promote the tourism potential of Newcastle West's historical heritage to facilitate the expansion of the existing tourism offer and associated spin off economic activity in the town and hinterland.
 - f. Develop connectivity to and synergies with Newcastle West and the Great Southern Greenway.

-Rural Areas:

Concerns are raised in relation to the lack of emphasis on rural areas in the document. Within the Draft RSES rural is defined as areas/settlements of 1,500 persons or less, which includes almost all of the towns and villages of County Limerick. The rural area of County Limerick is facing a number of challenges including town and village centre decline and depopulation, an ageing population and lack of access to infrastructure and services. A Rural Development Plan

for investment in key infrastructure and services is required for the development of the rural areas of the Southern Region.

-Networks:

The potential for driving sub regional growth through the creation of cross boundary networks is acknowledged. It is the understanding of the Elected Members that the Galway-Ennis-Shannon-Limerick Economic Network is a new initiative, which has not yet commenced. However, this is not clear in the document. As this is not a tried and tested initiative, it is requested that this proposed network is removed.

Chapter 4: A Strong Economy

In setting out the strategy for a strong economy, it is considered that the importance of Cork has been over emphasised... *"graced with three cities of regional and international significance, including the State's second largest city"* (pg.80). In addition, in setting out the strategy for a strong economy, it is unclear how the cities and key towns are envisaged to develop. This is of key importance given the potential dual purpose of the RSES as both a policy document and for promotion of the Southern Region.

No solution has been offered to address the megatrend issues of Brexit and US corporation tax changes and the subsequent impact on the Southern Region.

Given the extent of existing *"international branding"* within the region, concerns are raised in relation to RPO 68 (pg. 103) and the creation of excessive branding which could result in unnecessary investment. The Elected Members would like to note that the Limerick Brand is currently under investment. However, it is felt that overall the region lacks a single identity and it is considered that RPO 68 should be removed from the final RSES.

With respect to RPO 43 (pg. 90) the proposal to drive sustainable transboundary regional projects and initiatives in the Rural Economic Development Zones is acknowledged. However, it should be noted that the REDZ scheme has been replaced with the Town and Village Scheme. Reference to the REDZ scheme should therefore be removed from the RSES.

The agricultural and agri-food sector are critical for the Southern Region's rural economy. Rural communities need support to be sustainable, vibrant and continue to contribute to the economic development of the region.

The strategy fails to acknowledge the Limerick Docklands proposals for a technology park or the new technology park proposed to be developed in synergy with Limerick Institute of Technology in the Moyross area of Limerick City.

The retail sector is continuously shifting towards online retailing. The PWC, Retail & Consumer Report, 2018 indicates that Irish consumers spent approximately €5bn online last year, 60% of which was spent outside of Ireland. This issue has serious consequences for competition,

sales and footfall and the vibrancy and vitality of our town and village centres. However, this issue has not been addressed in the economic strategy for the region.

The Mid-West Regional Enterprise Plan 2019, which replaces the Mid-West Action Plan for Jobs should be acknowledged and referenced in the final RSES.

Chapter 5: Environment

Climate Change is now widely recognised as one of the most significant issues for the future of the Region with potential impacts extending across all land use sectors, the environment, economy and quality of life. While many RPOs in the Draft RSES address climate change adaptation and mitigation in some way, these RPOs need to form part of an overall, coherent strategy to address the significant long-term problem requiring an immediate and co-ordinated response. The provision of cross linkages between various sections of the RSES would be beneficial to the overall coherence of the document e.g. climate change as it relates to place making, water resources/quality, energy, transport etc..

The Elected Members would like to note that the “*Shannon Energy Valley*” project does not exist and in fact predated the Shannon Integrated Framework Plan for the Shannon Estuary. Therefore, reference to this initiative should be removed.

As set out under RPO 107 (pg. 121) “*Ecosystem Services*” “*Integrated planning for Ecosystem Services will be incorporated into the preparation of statutory land use plans in the region*”. Concerns are raised that the quantification of ecosystem services in the context of a City/County Development Plan would be difficult. Clarification is therefore sought as to how this RPO should be integrated into City/ County and Local level plans.

Chapter 6: Connectivity

Improving the links (walking, cycling, public transport and road based) between Limerick City and Shannon, and between Limerick and the cities of Cork and Waterford, is crucial for the efficient movement of people, goods and services across the Southern Region. The support for the road schemes between Limerick, Cork and Waterford in the Draft RSES is welcomed. Construction of the Limerick to Cork motorway in a timely manner would complete a vital piece of outstanding key infrastructure, which would enhance international competitiveness and attract investors to the Southern Region.

The public bus service/public transport infrastructure in Limerick, including a rural bus link service is inadequate and requires enhancement and substantial investment in the strive towards a low carbon society. The road network from Limerick to Kerry needs to be upgraded to facilitate improved connection times for the movement of goods between Shannon Foynes Port, Shannon Airport and County Limerick.

Within the next 5 years, during the lifetime of the RSES, fully autonomous cars will be available to purchase in Ireland. Fully autonomous vehicles will require comprehensive alterations to

on road telematics, signage and road widths for example. The move to autonomy will require extensive alteration to our existing road infrastructure and long term transport planning. This is a key consideration for future investment in transport and needs to be clearly addressed in this 12-year plan for the Southern Region. The Region's preparedness for adaptation to this new technology also provides huge potential for the generation of extensive spin off economic development.

The following amendments to the text are also suggested:

- Reference to the N24 Limerick to Limerick Junction upgrade needs to be specifically mentioned.
- Reference to the "N21/N69 Limerick to Adare to Foynes" scheme should read "Foynes to Limerick, including a bypass of Adare".
- Reference to "Newcastle West: Distributor Road" should read "Newcastle West and Abbeyfeale By Pass/ Relief Road".

Chapter 7: Quality of Life

The World Health Organisation (WHO) defines health as *"a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity"*. In this regard, health is much more than an absence of disease or disability, and individual health, and that of the Southern Region's population, affects the quality of everyone's life experience. Health means everyone achieving his or her potential to enjoy complete physical, mental and social wellbeing. In setting out the long term plan for Healthy Communities of the Southern Region, it is considered that this issue is not just about health care, education and inclusion as per the Draft RSES. In this regard, the combination of the cross-sectoral issues of health, wellbeing and place making is of key importance to achieving a healthy community and a good quality of life.

The Healthy Ireland initiative needs to be a key focus for improving the quality of life of the Southern Region. Limerick City is a recognised WHO Healthy City. Healthy Limerick aims to improve health, wellbeing and quality of life by ensuring all sectors are aware of and collaborate to achieve a healthy society across the county and not just at city level.

The underutilised rail networks have potential in terms of the creation of green and blue infrastructure, improved connectivity, reduction in carbon emissions and associated benefits for the health of our communities.

Social inclusion is fundamental in the creation of a balanced and sustainable community. The changing cultural identity and diversity of our communities needs recognition in the long term planning of facilities. With respect to diversity and social inclusion, with particular reference to RPO 171 *"Diverse and Socially Inclusive Society"* and 172 *"Social Inclusion"*, it is considered that the proactive contribution of immigrants to development and enterprise in the region should be acknowledged.

Chapter 8: Water & Energy Utilities

The towns and villages of County Limerick cannot be restricted by a lack of investment in infrastructure and other budgetary restraints. Continued investment in water services infrastructure and incentives for residing in rural towns and villages should therefore form an essential element of the RSES.

Sustainable Management of Water Supply and Waste Water Needs (pg. 185) states *“key priorities for the region are to ensure that the settlement strategy has regard to capacity of existing public water services”*. This text should be removed as the infrastructural needs should have regard to the settlement hierarchy, as outlined in RPO 203 *“Irish Water and Wastewater”* (pg. 188). RPO 203 states that *“it is an objective to seek Irish Water to revise the Draft Investment Plan (2020-2024), and subsequent investment plans, to align the supply of wastewater treatment facilities with the settlement strategy and objectives of the Southern Region RSES and MASPs for Cork, Limerick-Shannon and Waterford”*. Further to the above, concerns are raised that this RPO states that it is an objective to *“seek”* Irish Water rather than taking a more directional approach such as *“Irish Water shall revise the investment plan”* to address this issue.

With respect to energy supply as set out on pg. 190 *“Strategic Energy Grid”* the Draft RSES recognises that *“even with significant demand centres, the region has more generation than demand at present. The “Regional Solution” addresses the need of the system and will increase transfer capacity from south and southwest to the Eastern and Midland Region”*. The *“Regional Solution”* mentioned is not a general geographic regional strategy, but a specific infrastructural investment in an interconnector under the Shannon connecting North Kerry to Moneypoint power station and then onto the 400 kV transmission lines to the East of the country. The *“Regional Solution”* proposed in the Draft RSES, is therefore to harness the renewable energy resources in the Southern Region, and transfer them to the Eastern and Midland Region. Serious concerns are raised in relation to this proposal. In this regard, the RSES must ensure that adequate capacity is available in water, wastewater and energy supplies to cater for the envisaged growth in population and employment.

Chapter 9: Implementation, Monitoring & Evaluation

In order to deliver key infrastructure and achieve the associated objectives, the key delivery agencies require identification and need to be brought on-board at the earliest opportunity.

Delivery of the RSES vision and objectives requires substantial investment of resources. A key to implementation will be the partnership process with stakeholders and the community working together to ensure delivery.

Appendix 2

A number of key attributes have been omitted and inclusion of the following is requested:

- Foynes Tier 1 Port and the Foynes Port Company.
- Strong collaboration between key stakeholders.
- Raheen and Castletroy National Technology Parks.
- Health facilities including the Regional Health Headquarters at the University Hospital Limerick.

Conclusion

In conclusion, the Members acknowledge that the adoption of the Regional and Spatial Economic Strategy for the Southern Region is vital for the growth and investment of Limerick over the next 12 years. The Elected Members of Limerick City and County Council request that the Elected Members and Executive of the Southern Regional Assembly have due regard to the issues raised above in the finalisation of the RSES and MASP for Limerick Shannon.