



Teil/Tel: +353 (0)51 860700 Facs/Fax: +353 (0)51 879887  
R-phost/Email: info@southernassembly.ie Idirlíon/Web: www.southernassembly.ie

Forward/ Strategic Planning,  
Economic Development Directorate,  
Limerick City & County Council,  
Merchant's Quay,  
Limerick  
V94 EH90.

9<sup>th</sup> October 2020

**RE: Limerick Development Plan 2022-2028 Pre-Draft Consultation  
SRA File Ref: 20/006**

A Chara,

The Southern Regional Assembly (SRA) welcomes the publication of the Limerick Development Plan 2022-2028 Pre-Draft consultation Issues Paper document and the opportunity to consult with the Council under Section 11 of the Planning and Development Act 2000.

The SRA makes this observation in accordance with Section 27 A of the Act which obliges the Regional Assembly to make submissions or observations regarding a number of matters including:

- Policies and objectives in relation to national and regional population targets.
- Distribution of residential development and related employment with a view to:
  - Promoting consistency as far a possible between housing, settlement and economic objectives of the Draft Plan, Core Strategy and RSES.
  - Assisting in the drafting of the Core Strategy of the Draft Development Plan.
- Objectives of providing physical, economic or social infrastructure in a manner that promotes regional development through maximising the potential of the Region.
- Planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services.
- Collaboration between the planning authority and the Regional Assembly in respect of integrated planning for transport and land use and the promotion of sustainable transport strategies in urban and rural areas.
- Promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to Climate Change.

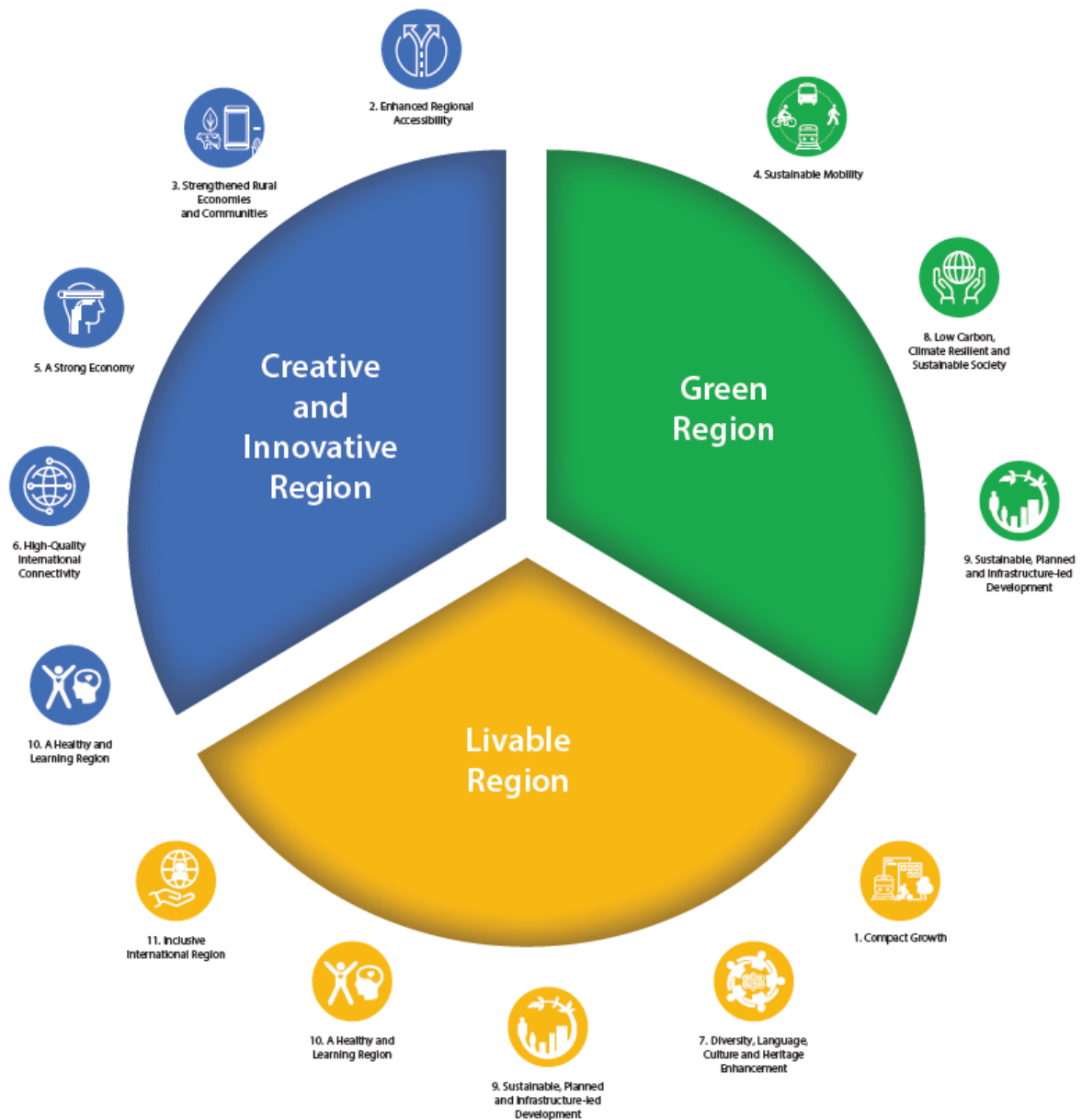
The opportunity to engage with Limerick City and County Council through the pre-draft phase of the process is also important in relation to Section 22 (A) (3) of the Act which requires that public bodies (including local authorities) consult with the Regional Assemblies, as appropriate, when preparing its own strategies, plans and programmes to ensure that they are consistent, as far as practicable, with national and regional objectives set out in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). Continued collaboration throughout plan development is welcomed. Both the RSES and Limerick-Shannon Metropolitan Area Strategic Plan (LSMASP) were made on the 31<sup>st</sup> January 2020.

## 1.0 Overall Observations

The SRA commend the quality of the publication. At this stage of the process, the SRA intend to outline high level points under the eight themes provided in the Issues Paper.

The Limerick Development Plan 2022-2028 is pivotal to achieving the step change required by national and regional policy for Limerick and the Limerick-Shannon Metropolitan Area to fulfil its potential. Achieving the rate of growth targeted requires significant change and will present major challenges to be met for the Development Plan. The Development Plan will be critical in establishing this direction of change, embedding the pathway for transition to compact growth and delivering on targets and strategic infrastructure.

*Chapter 2: Strategic Vision* sets out the strategic vision and overall strategy for the RSES. Section 2.2 and the associated Strategy Statements and Key Enablers are particularly relevant for the Development Plan. The RSES provides a vision for the development of the Southern Region to become one of Europe's most **Creative and Innovative**, **Greenest** and **Livable** regions.



The RSES combines our international and national commitments with regional development priorities in 11 Strategy Statements to deliver the vision for the Region:

- |   |   |   |   |
|---|---|---|---|
| <br>1. Compact Growth  | <br>2. Enhanced Regional Accessibility         | <br>3. Strengthened Rural Economies and Communities          | <br>4. Sustainable Mobility                                  |
| <br>5. A Strong Economy  | <br>6. High-Quality International Connectivity | <br>7. Diversity, Language, Culture and Heritage Enhancement | <br>8. Low Carbon, Climate Resilient and Sustainable Society |
| <br>9. Sustainable, Planned and Infrastructure-led Development | <br>10. A Healthy and Learning Region         | <br>11. Inclusive International Region                     | <br>11. Inclusive International Region                      |

A key component of the RSES strategy is to strengthen the settlement structure of the Region and to capitalise on the individual and collective strengths of our three cities, our metropolitan areas, and our strong network of towns, villages and rural communities.

The RSES should be consulted across the themes covered in the Issues paper as the Council moves to preparation of a Draft Development Plan. The RSES is available through the following link:

<http://www.southernassembly.ie/regional-planning/regional-spatial-and-economic-strategy>

## 2.0 People and Places

*Chapter 3: People and Places* provides the regional settlement strategy. We refer in particular to *Section 3.2: Sustainable Place Framework* and *Section 3.3: A Tailored Approach* and the settlement typology set out in Table 3.2 including:

1. Cities and Metropolitan Areas – Limerick-Shannon MASP
2. Key Towns – Section 3.5 including Newcastle West
3. Towns and Villages – Section 3.6
4. Rural Areas – Section 3.7
5. Networks – Section 3.8.

Achieving compact growth is a central theme of the RSES. This means that 50% of all new homes targeted for Limerick City and 30% in other settlements must be within their existing built up footprints. This level of growth presents both a significant opportunity and a challenge.

Growth targets for each local authority are set to 2031 and require a framework to put actions into practice. For this reason, the RSES focuses on:

- **Strong Collaboration:** Partnership between Limerick-Shannon, Cork and Waterford Metropolitan Areas (extending to Galway) to harness their combined potential as engines of growth to drive regional parity. In addition, potential networks are identified to encourage cross boundary collaboration.
- **Flexible Framework:** Flexibility is enabled to seek evidence based and tailor-made growth responses by each local authority for different places. Important principles are set for local authorities to follow when determining the allocation, scale and phasing of growth.
- **Transitional Change and Infrastructure Delivery:** The RSES recognises that the level of change required to meet targets cannot be achieved immediately. It will require several RSES/Development Plan cycles and lead-in time for providing infrastructure to achieve the targets to 2040. A strong emphasis is therefore placed on funding mechanisms and holistic approaches to delivering integrated infrastructure packages for our settlements (physical, social, environmental inter alia).

The Core Strategy will be a key element in the Draft Development plan to apply in detail the ambitious growth rates for the Metropolitan Area and to determine the hierarchy of settlements and appropriate growth rates for the County. The RSES requirements relating to Core Strategy are set out in Section 3.3 of the RSES and include Regional Policy Objectives (RPOs) such as *RPO 2: Planning for Diverse Areas*, *RPO 3: Local Authority Core Strategies* and *RPO 5: Population Growth and Environmental Criteria*.

New national guidelines for rural housing and development plans are awaited and will provide an important input to preparation of the Draft Development Plan when published together with a Housing Needs Demand Assessment (HNDA).

The Core Strategy should reflect NPF and RSES priorities by positioning the Limerick-Shannon Metropolitan Area as a primary driver for economic and population growth in the Southern Region.

### 2.1 Limerick-Shannon Metropolitan Area (LSMASP)

The RSES recognises that our Cities and Metropolitan Areas require a significant step change to achieve vibrant higher density compact growth.

In identifying Limerick as one of five Cities in the State for targeted growth and the designation of a Metropolitan Area around the City, the NPF has presented a unique opportunity for the accelerated growth and transformational development of Limerick City. This needs to find strong expression in the new Development Plan. Preparation of the new Development Plan is an opportunity to implement

*RPO 6: Collaboration between Metropolitan Areas* and harness the combined strengths of these Metropolitan Areas.

The RSES implements the NPF National Policy Objectives for the targeted growth of Limerick City through the Limerick-Shannon Metropolitan Area Strategic Plan (LSMASP), which sets a high-level strategic framework for the Metropolitan Area. Through *Policy Objective 1* of the MASP, the Limerick-Shannon Metropolitan Area is positioned to be:

- A primary driver of economic growth and population growth in the Southern Region.
- A complimentary location to Dublin
- An international location of scale

The new Development Plan will require a strong and distinct focus and emphasis on the Metropolitan Area with development objectives to reflect MASP policy objectives and should be informed by the vision for the Metropolitan Area as set out in the LSMASP:

*“To create a sustainable, inclusive, smart, climate and economic resilient Limerick-Shannon Metropolitan Area, which is competitive and of a scale which can exert critical-mass leverage at an international level, maximising the economic, social, cultural and environmental opportunities in a manner for all those who live, work and visit the Metropolitan Area, Mid-West and for the benefit of the country.”*

The Draft Development Plan should also be informed by the key infrastructural and transformative enablers in *Section 2.1: Limerick City*, the Guiding Principles in Section 3.2 and National Enablers in Section 4.0 of the LSMASP in formulating the Development Plan policy for the Metropolitan Area.

Section 3.4 of Chapter 3, addresses the key challenge for our Cities and Metropolitan Areas and sets out key RPOs to support their development:

- RPO 6 Collaboration between Metropolitan Areas
- RPO 7 Delivery and Funding – for strategic investment priorities
- RPO 8 Investment to deliver on the vision for Metropolitan Areas
- RPO 9 Holistic Approach to Delivering Infrastructure
- RPO 10 Compact Growth in Metropolitan Areas.

In addition, Appendix 3 of the RSES sets out shared goals shared across each of our Region’s Cities and Metropolitan Areas:

Goal 1: Sustainable Place Framework

Goal 2: Excellent Connectivity and Sustainable Mobility

Goal 3: Economic Engines Driving Regional Growth

Goal 4: High Quality Environment and Quality of Life

Goal 5: A Learning, Welcoming and Socially Inclusive Metropolitan Area

Goal 6: Pioneering Locations Networked Internationally and Regionally

Goal 7: Evolve Innovative Approaches and Strategic Priorities

The Draft Development Plan should address these themes in the development of the overall strategy for the Metropolitan Area.

## 2.2 Key Town of Newcastle West

Fourteen Key Town are identified in the RSES that reflect the differing urban structure across our Region.

The Key Town of Newcastle West (see RPO 22) will play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. While local authorities are supported in targeting growth of more than 30% in Key Towns subject to capacity analysis, it is important to note that the nature, scale and phasing of growth of each Key Town will be determined by local authorities through the Core Strategy.

The Draft Development Plan should address the special circumstances of Newcastle West as one of the Region's smaller scaled Key Towns but possessing a strategically located urban centre of significant influence in a sub-regional context with scope for interregional collaborations across county boundaries with Abbeyfeale, Listowel and Rathkeale and locations identified in the Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary. This offers collective strengths and potential for project partnerships to drive sustainable economic growth in the West Limerick/North Kerry area.

Through the RSES, Irish Water (IW) Investment Plans must align with the objectives and settlement strategy of the RSES and assist the strategic role played by Key Towns. Collaboration is required between IW and local authorities to agree phasing, water and wastewater services to accommodate growth in a phased, sustainable manner.

Subject to capacity analysis, RSES Section 3.5 states that some Key Towns may justify significant growth while others may place a greater emphasis on strengthened services, facilities and economic roles.

## 2.3 Towns and Villages

After the Limerick-Shannon Metropolitan Area and Key Town of Newcastle West, the distribution of growth across the County's other towns, villages and rural areas is a matter for the Development Plan to address. The RSES does however seek prioritisation (see Section 3.6 Towns and Villages) in the growth allocation for settlements informed by guiding principles as set out under RSES *Section 3.3. A Tailored Approach*.

The RSES recognises that towns and villages are the local drivers for their surrounding areas and a sustainable, infrastructure-led growth approach is encouraged at the appropriate scale. RPO 26 specifically relates to towns and villages. Part (d) of RPO 26 states:

*"Local authorities will identify settlements which can play an enhanced role at sub-regional level to drive the development of their area;"*

*Section 3.3: A Tailored Approach* states that when allocating for future growth in the Core Strategy of each Development Plan, local authorities will have regard to the RSES settlement typology and apply the following guiding principles:

- Scale of population and its existing performance;
- Extent to which a settlement is located inside or outside one of the three defined Metropolitan areas
- Scale of employment provision, number of jobs, jobs-to-resident workers ratio and net commuting flows.
- Compliance with NPO 72 of the NPF.
- Linking Core Strategies to an evidence base on the availability and deliverability of lands within the existing built up footprints.

- Extent of local services and amenities provided.
- Rate and pace of past development and the extent to which there are outstanding requirements for infrastructure and amenities
- Extent to which sustainable modes of travel can be encouraged.
- Accessibility and influence in a regional and sub-regional context.
- Sub-regional interdependencies
- Accessibility as a service centre for remote and long-distance rural hinterlands.
- Track record of performance and delivery, as well as ambition and scope to leverage investment
- Environmental and infrastructure constraints.
- The appropriate density and scale of development relative to the settlement and location.
- Need for attractive, alternative options to rural housing within smaller towns and villages.

The Draft Development Plans should include appropriate guidance for new homes in small towns and villages and renewal initiatives to assist an evidence-based approach to identifying appropriate sites for housing, social and physical infrastructure, including water and wastewater infrastructure.

## 2.4 Rural Areas

The RSES strongly supports the development of our rural areas, and Chapter 3 recognises the decline of population and services in many of our smaller settlements as a problem of strategic national and regional importance and acknowledges the need for investment to reverse decline and attract population and enterprise growth.

*Section 3.7: Rural Areas* of the RSES states that Core Strategies in Development Plans should identify areas under strong urban influence in the hinterlands of settlements. They will set an appropriate rural housing policy response to avoid ribbon and over-spill development from urban areas, support revitalised towns and villages, achieve sustainable compact growth targets and protect the rural resource for rural communities, including people with an established local connection to the area and relevant policy is set out in RPO 27. This facilitates the needs of rural communities, whilst controlling pressures for urban-influenced housing demand. Updated national guidance is anticipated.

The importance of our rural areas is highlighted throughout the RSES including for example rural economic development (see Section 4.5), and rural connectivity (see Section 6.3 and RPOs 158 and 172). Various parts of our rural Region have different requirements requiring local customised responses, but all require greater economic diversity and innovation to ensure resilience.

## 2.5 Networks

The RSES recognises that's when settlements combine their similar economic strengths and specialisms it provides strategic opportunities to drive the regional economy. These networks present opportunities for collaborative projects and shared benefits from strategic infrastructure investments, particularly from improved inter-regional connectivity (transport networks and digital communications) perspective.

Chapter 3 and 4 identify the importance of networks, with examples of settlements sharing assets and collaborating to drive economic growth. From a Development Plan perspective, it is important to note that while the RSES process has identified the potential for collaboration actions, a commitment to deliver is required at a local level if opportunities are to be realised.

Potential networks that pertain to Limerick include:

- Galway Ennis-Shannon-Limerick Economic Network: a potential network of Key Towns and Metropolitan Areas sharing assets on the Atlantic Economic Corridor.

- North Kerry/ West Limerick/Shannon Estuary/Clare: a potential network connected with the Shannon Estuary and Shannon Foynes Port.
- Limerick-Waterford Transport and Economic network/axis: This potential network along a strategic east-west axis across the Region links the cities of Limerick and Waterford and the Atlantic Economic Corridor and Eastern Corridor

The RSES also identifies the economic role played by smaller scaled settlements for their surrounding rural hinterlands and the opportunities for sharing assets and opportunities (see RPOs 28, 29 and 30) between different settlements to drive rural economic growth. The SRA supports initiatives through the Development Plan to harness the potential of such networks.

## 2.6 Compact Growth and Regeneration

Compact growth and regeneration are cross-cutting themes for settlements of all sizes. The majority of questions in the Issue Papers under *People and Places* refer to these topics. The RSES and MASP seek a dynamic Development Plan approach to achieve Core Strategy growth targets. *Section 3.11: Regeneration* states that the regeneration and development of urban brownfield and infill sites to achieve higher density populations will need to be a priority for local authority plans, with a focus given to mixed-use developments for vibrant living and working urban centres.

The RSES includes specific objectives in relation to compact growth and for Metropolitan Areas. In its preparation of the Draft Development Plan, the Council should implement *RPO 10: Compact Growth for Metropolitan Areas* with policies and actions to:

- Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.
- Identify strategic initiatives to achieve compact growth and regeneration.
- Consideration of Active Land Management Units with a remit to focus on the metropolitan areas and delivery of projects to achieve compact growth.
- Demonstrate partnerships with the Land Development Agency
- Support for the role of the Local Authority as a development agency to kick start regeneration.
- Deliver site briefs for strategic sites.
- Active initiatives to deliver renewal under the Urban Regeneration and Housing Act 2015
- Active initiatives to tackle derelict sites and under use of vacant property assets.
- Active initiatives for enhancing the public realm.
- Creation of data bases and systems for reporting progress and action across regeneration, development and infrastructure delivery.

For the Limerick-Shannon Metropolitan Area this will necessitate detailed objectives to achieve at least 50% of all new homes in the existing built-up footprint of Limerick City and Suburbs, focusing on urban regeneration, brownfield and infill development. This will require, for example, targeted approaches involving active land management to deliver new housing and mixed-use development.

*Section 7.2: City Centre Consolidation and Regeneration* of the LSMASP strongly promotes and supports a Living City as per the Guiding Principles. The development of additional housing within Limerick City Centre will achieve a redeveloped and vibrant, walkable core. The MASP states that the development of additional housing stock within Limerick City Centre will be achieved by (i) developing high-density housing at strategic locations, (ii) upgrading, modernising and densifying areas containing social housing stock and (iii) the development of underutilised landbanks.

Section 7.2 also states that actions will be identified at the local authority level to improve housing stock and quality and to bring buildings back into use in Limerick City Centre. These actions will include improvements to public realm and amenities to create more attractive streetscapes and desirable neighbourhoods. The MASP supports collaboration between local authorities and the Land



Development Agency to masterplan and develop strategic City Centre sites in Limerick City, utilising the appropriate planning mechanisms. Policy Objective 10 also refers.

The central role Limerick City Centre will play in the accelerated growth and transformational development of the Metropolitan Area needs to find strong expression in the new Development Plan. Section 7.2 states that as regeneration issues in Limerick City are similar to Shannon, there are opportunities for both local authorities to work together to overcome challenges. This should be explored further through the Development Plan process.

For Newcastle West and other towns and settlements, RPO 35 (c) states:

*“Development Plans shall set out a transitional minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs, within their existing built up footprints in accordance with NPF National Policy Objective 3c. This will be evidence based on availability and deliverability of lands within the existing built up footprints.”*

*RPO 34: Regeneration, Brownfield and Infill Development* states that, in pursuit of the NPF’s NPO 3a, 3b and 3c, the Development Plan Core Strategy should be accompanied by specific objectives setting out the achievement of urban infill/ brownfield development. Considerations for brownfield site remediation are provided by RPO 34.

The RSES recognises that infill and brownfield development is complex. In this regard, active land management initiatives are supported through *RPO 37: Active Land Management* while the work of the Land Development Agency is supported in RPO 36. Collaboration is required between Irish Water (IW) and the local authorities to agree phasing, water and wastewater services to accommodate growth in a phased, sustainable manner.

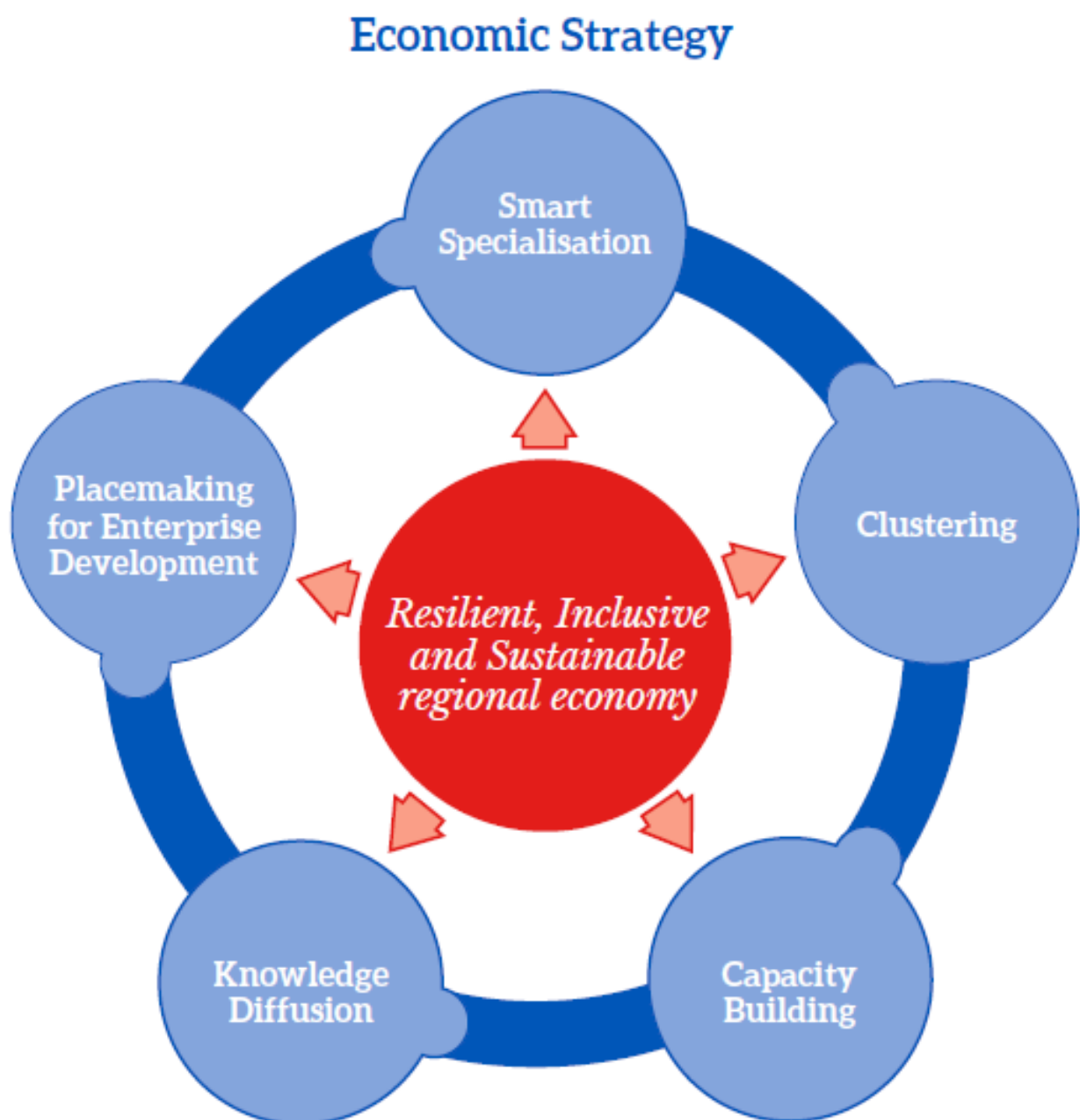
### 3.0 Economic Development and Employment

*Chapter 4: A Strong Economy Innovation and Smart* provides a ‘regionalisation’ of national economic policy. The RSES states that our Region needs to transform our enterprise base through diversification and innovation for longer term resilience while managing potential vulnerabilities.

The Draft Limerick Development Plan should strive to enable sustainable, competitive, inclusive and resilient growth. This requires the development of a strong and diverse economic base.

#### 3.1 Economic Strategy

Five economic principles are contained in RSES economic strategy and these should be reflected and integrated into the Development Plan:



1. **Placemaking** will be instrumental to ensuring that Limerick City and County retains and attracts sufficient human capital and talent. Limerick 2030 is cited as a good practice example in Section 4.7 of Chapter 4 and provides an excellent platform to promote even more active urban development and land management actions that focus on the development of under-utilised, brownfield, vacant and public lands.
2. **Capacity Building** is required to bid for and win competitive funds and to ensure successful implementation of the Development Plan. The key message of the RSES is for all local authorities and relevant agencies to ensure they have capacity to identify funding resources for implementation and this should be reflected in the formulation of the Draft Development Plan.
3. The full scope of future work and skills required for our economy remains unknown. Creating the culture of learning through **Knowledge Diffusion** and the creation of a Learning Region are essential to securing greater economic resilience. The RSES promotes the establishment of a Learning Region which will build our skill base. Limerick is an UNESCO Learning City and has an excellent platform to excel in this regard. Encouraging collaboration between higher education institutes, the Regional Skills Fora and the Educational and Training Boards presents the potential to develop skills and knowledge in areas most exposed to technological disruption. By supporting community and education providers, Limerick City and County can ensure that knowledge and skills are spread to all citizens to help address skills shortages and lifelong learning challenges
4. The RSES states that it is important that an enterprise-friendly ecosystem is facilitated, including skills-matching, collaborations between government, industry, higher education and communities. **Smart Specialisation** will play a central role as it brings together key stakeholders to identify the competitive advantages of an area with the view of developing economic opportunities.
5. Fostering modern **Clustering** policies is a strong feature of the Region's economic strategy. An example of a cluster initiative is Limerick for Engineering which is an industry led initiative pioneering collaboration between industry and education and training providers. The Mid-West Skills Forum has been particularly successful in establishing clustering initiatives and this should be reflected in the Draft Development Plan.

The three Regional Assemblies have published the [COVID 19 Regional Economic Analysis](#) to inform policymakers at a local, regional and national level of the extent of economic exposure and resilience across Ireland. This is consistent with the key principal of building economic resilience as supported in the RSES (*RPO 75: Anticipating Economic Structural Changes*).

This report developed a COVID-19 Exposure Ratio which represents the total number of its commercial units that were operating in the sectors likely to be worst affected by the COVID-19 outbreak, as a proportion of its total commercial stock as of September 2019. The higher this ratio is for an area, the more likely this area is exposed to significant economic disruption.

The report shows County Limerick has a relatively low "COVID-19 Exposure Ratio", with 46.2% of its commercial units operating in the sectors likely to be worst affected. The report indicated an Exposure Ratio of 44.9% for Limerick City and a relatively low Exposure Ratio for Newcastle West of 45.3%. The economic impact of COVID-19 will have far reaching implications and the ability of policymakers to use an evidence-based approach in identifying the exposure, resilience and appropriate responses is critically important.

### 3.2 Region's Economic Drivers

The Region's economic drivers reflects the settlement strategy contained in Chapter 3 of the RSES. Research (ESRI 2018) has identified that the development of scale in our cities will have regional and national benefits. The provision of infrastructure, services, housing, and amenities to attract and retain residents is critical to achieve these benefits. Creating a strong City and Metropolitan Area should be the central element to establishing Limerick's economic resilience. Enhanced collaboration between all three Metropolitan Areas will be a key enabler in this regard. Promoting a collaborative intra-regional partnership approach between Limerick-Shannon, Cork, Waterford and Galway should be a key priority in the Development Plan.



The Atlantic Economic Corridor offer opportunities for inter-regional collaborative initiatives and an all-island economic perspective. Limerick's central location within this corridor is a significant advantage and presents an opportunity for Limerick to play a lead role in inter-regional collaboration initiatives.

Developing the economic potential of Newcastle West Key Town, towns and villages will provide the economic catalysis for rural areas. *Section 4.5: Rural Development* states that sustainable rural communities are dependent on viable and vibrant towns and villages. Various parts of rural Limerick have different requirements requiring local customised responses, but all require greater economic diversity and innovation to ensure resilience. Section 4.5 and RPOs 43 to 50 set out key policy areas to support rural development including the need for digital and physical infrastructure and polices. Good practice examples are cited which may offer policy solutions and responses in the Draft Development Plan. Cross boundary co-operation within our Region to address similar problems is a key theme of the RSES and this may be explored further through the Development Plan process.

### 3.3 Sector Development Opportunities

Particular industries have place-specific needs, such as proximity to high-energy services infrastructure, water capacity, availability of employees, proximity to public transport, access to international markets through airports and ports, and serviced lands. Section 4.6 of the RSES states that these issues should be considered in Development Plans.

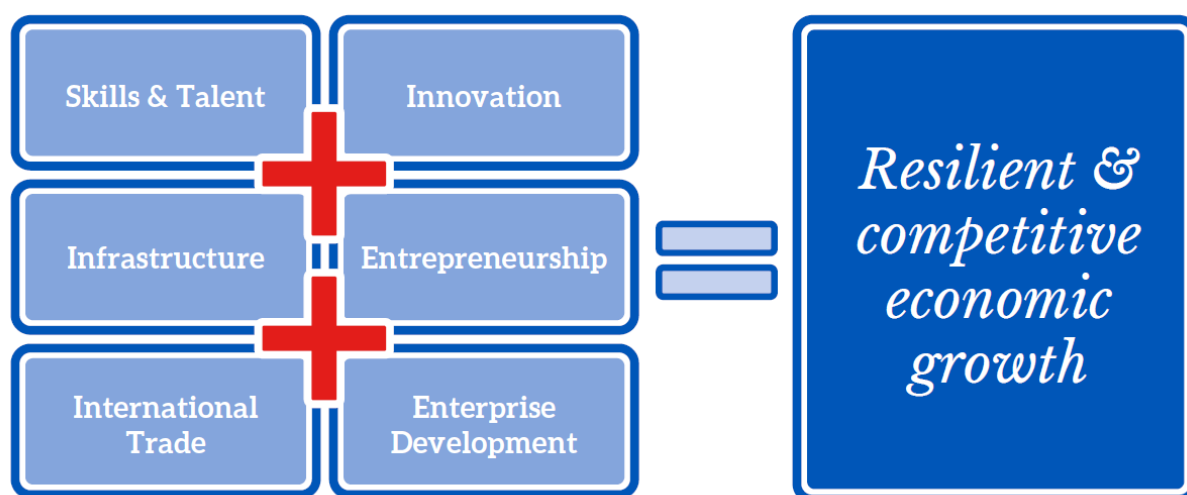
The Marine sector is identified in the RSES as an emerging sector. This is applicable to Limerick given the potential of Shannon Estuary. This sector will be central to Marine Spatial Planning and revitalising rural and coastal communities. RSES *Section 4.9.2: Growing the Blue Economy* and *Section 6.3.4.2: Our Regions Strategic Port and Harbour Assets* are important supports to Development Plan policy on marine potential.

The Issues Paper identifies the issue of protecting traditional on street retailing with the increase of online shopping. RPO 55 specifically relates to retail and supports the sequential approach to retail development, placemaking to improve vitality and vibrancy of urban centres, and the preparation of retail strategies including Joint Retail Strategies. PO 17 of the Limerick-Shannon MASP states that within one year of the adoption of the RSES/MASP a Joint Retail Strategy shall be commenced for the Limerick Shannon Metropolitan Area in accordance with the Retail Planning Guidelines.

*Section 8.7: Retail* of the Limerick-Shannon MASP states that retailing business model is evolving in a digital direction. Therefore, retail should be at the centre of any digital strategies developed by local authorities. A city or town centre should attract consumers by offering a unique retail experience and to evolve in line with data about shopping preferences and behaviour.

It is important given the rapid evolution of the economy that Limerick has the capacity to adapt to emerging trends. New sectors are constantly emerging and policy approach of the Development Plan should be flexible to allow adaption to emerging sectors. Section 4.6 of the RSES supports enterprise transitions to Industry 4.0 and equipping people with the necessary skills to adjust and adapt to technology changes and disruptions, while creating an enterprise ecosystem that promotes innovation and entrepreneurship in emerging opportunities. This will improve competitiveness and resilience which are in turn underpinned by skills development, innovation capacity, trade and competition, and infrastructure investment.

### Components required to develop resilient and competitive economic growth



The delivery of actions under Mid-West Regional Enterprise Plan and Mid-West Regional Skills Forum are important and should be supported through the Draft Development Plan.

### *3.4 Limerick-Shannon Metropolitan Area*

The Limerick-Shannon MASP incorporates the principles of the RSES economic strategy. Limerick City's exemplar record of recovery shows a high level of resilience which bodes well for the future. Key to this success has been the many collaborative initiatives that have emerged and are detailed in *Section 8.0: Employment and Enterprise*. Building on this unique proposition could be the cornerstone of the Draft Development Plans economic strategy, particularly in relation to the Metropolitan Area.

The role Higher Education Institutes play in addressing social disadvantage is recognised in *Section 8.9*. In addition, Section 8.10 identifies that enhancement of linkages between enterprise and higher education and research is critical. There are several collaborative education-industry initiatives already underway, which focus on increasing the quality and quantity of the talent stream. This provides an opportunity for the Draft Development Plan to communicate the Limerick-Shannon Metropolitan Areas selling point as a hub of internationally recognised learning excellence.

## 4.0 Connectivity

### 4.1 Transport and Mobility

The Issues Paper states that current transport trends are unsustainable and in order to meet future travel demand, change is needed. Urgent actions are required to improve modal change to sustainable mobility, especially when commuting trips nationally are expected to rise by 35% over current levels by 2040<sup>1</sup>. The RSES addresses this challenge by placing a significant emphasis on a switch to sustainable mobility by requiring:

- Lower tiered plans and other transport strategies to enact land use and transport planning integration.
- The distribution of future population and employment growth must be aligned with transport infrastructure.
- Targets for modal change at a local level must be set.
- Actions, assisted through National Development Plan (NDP) investment, must target sustainable transport infrastructure as a priority.
- Increased priorities must be set for increased permeability in settlements for active travel, integrated multi modal travel chains, bus, rail, walking and cycling networks and inclusion of innovations in e-mobility.

The preparation of transport and mobility policies in the new Development Plan is a major challenge. There are four broad areas to consider a policy approach:

- (1) Sustainable mobility and public transport improvements for a City with a projected population growth of 50% to 60% to 2040.
- (2) Improved regional accessibility by road and rail.
- (3) Improvements to local public transport services and sustainable transport modes for the Key Town of Newcastle West and for the wider county with improved connectivity from towns, villages and rural areas as alternatives to use of the private car.
- (4) Policies to support the sustainable movement of freight through the County and to and from the Shannon Foynes Port and Shannon International Airport.

*Section 6.0: Integrated Land Use and Transport* of the LSMASP states the principles underpinning the MASP include the effective integration of transport planning with spatial planning policies, from regional to local level and the alignment of associated transport and infrastructure investment. The Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) will be instrumental in the regeneration and transformation of Limerick City and the wider Metropolitan Area. A key priority of the MASP is the development of strategic residential areas to support sustainable transport and the provision of the Limerick Northern Distributor Route (LNDR).

PO 6 (b) of the LSMASP states that the Development Plan will identify public transport corridors and nodal points on corridors in the Metropolitan Area arising from the LSMATS which have potential to support high density development/regeneration. In addition, the Development Plan shall identify the appropriate land use zonings for these nodal points and demonstrate the effective alignment between land use and transport infrastructure planning and delivery of the NPF Compact Growth targets as they apply to the Limerick-Shannon Metropolitan Area. PO 6 (d) states that it is an objective to seek sustainable higher densities where practicable at public transport nodal points.

Successful integration of employment, housing and services with improved transport infrastructure is a priority issue for the wider County. *RPO 151: Integration of Landuse and Transport* and *RPO 152: Local Planning Objectives* set out important principles to guide land use development in settlements to enable behavioural change and support active travel and viable public transport services with the right development in the right locations.

---

<sup>1</sup> DTTS Sustainable Mobility Policy Review 2020

The RSES supports the role of Local Transport Plans (LTPs) to be prepared for Key Towns and other settlements (RPO 157) by local authorities based on Area Based Transport Assessment guidance from the NTA and TII. LTPs are important new land use and transport planning tools. Their preparation and implementation by transport agencies and local authorities is a new requirement in planning, sought by RSES objectives. Kilkenny City for example are currently preparing a LTP. These initiatives are an important step in improving sustainable mobility and they will assist actions at a local level to achieve sustainable 10 minute cities and towns.

There is a strong emphasis on linking placemaking policy to connectivity in the RSES. For example, the RSES supports 10 Minute Cities and Town neighbourhoods (*RPO 176: 10 Minute City and Town Concepts*) as a concept whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. Communities will need sufficient densities to realise the potential of a 10 Minute Town and its benefits for placemaking. The Draft Development Plan should include measures to support opportunities for sustainable 10 Minute Cities and Town neighbourhoods and to develop good practice in the concept.

The SRA are a partner in the EU Interreg Europe MATCH-UP project which aims to achieve significant improvements of modal interchange to foster low-carbon urban mobility. An outcome from the project is to set a framework of good practice to implement 10 Minute City and Town concepts successfully in the Region. This report along with supporting information is available on the [SRA website](#).

RSES support for intra-regional rural connectivity and improvements to transport networks along the Region's national tourism corridors in Chapter 6 are important for Development Plan policy for strengthened rural connectivity. Road based transport is often the only viable mode for rural and peripheral locations. The strategic road improvement schemes identified under the NDP are supported in the RSES (RPOs 167 and 168). The Draft Development Plan should ensure investment in road infrastructure is also framed in economic, social, environmental and sustainable transport terms (the opportunity to strengthen rural public transport and bus networks).

The delivery of cycle routes and greenway and blueway corridor projects are cited in the RSES for regional support but of equal importance from a regional perspective are smaller, cost effective measures to enhance walking and cycling permeability within and between our settlements. RPO 174 especially is a strong support for local authority policy and actions to improve walking and cycling facilities within and between settlements.

The need for regional port and airport strategies has been identified to harness the combined potential and capacity. Efficient, safe and seamless transport chains between our cities, ports and airports for the movement of goods and passengers is recognised. Projects under the NDP that develop the EU TEN-T multi-modal network in our Region are supported under RSES objectives. The need for a Regional Freight Strategy is identified in the RSES. This will improve the efficient movement of freight under different modes (optimising rail especially) between our cities, ports and airports and across the three regions. This initiative will assist in strengthening regional economic cohesion and will emphasise climate actions.

Investment and steady state maintenance in our existing road networks is still important. The RSES supports the role of our road networks as economic corridors for the movement of goods, as public transport corridors and as "life-lines" to rural and peripheral locations. Investment in road networks is supported in the context of an increased priority for low carbon transportation, public transport networks and increasingly for use by e-mobility modes (such as autonomous and electric vehicles).



#### 4.2 Digital Connectivity

Digital infrastructure and smart technologies are critical enablers for economic and social revitalisation. The RSES supports is a Smart Region to build on existing Smart City initiatives, embedding digital technology across many functions to improve our quality of life.

Limerick's Digital Strategy will greatly assist the vision to establish a Smart Region. OP 12 (b) of the LSMASP seeks investment in the initiatives of local authority Digital Strategies and investment in initiatives to deliver a greener, more innovative and smarter city and Metropolitan Area. OP 12 (d) states that

*"it is an objective to support the Limerick Digital District and to accelerate Limerick's transition to becoming Ireland's first digital city."*

Limerick clearly has an excellent track record in digital connectivity initiatives and its ambition to become Ireland's first digital city is commended. This unique proposition and strength should be highlighted in the Draft Development Plan while framing it in the context of relevant RSES and LSMASP policy objectives.

## 5.0 Infrastructure

The RSES requires phased growth targets in tandem with infrastructure services under local authority Development Plans. It requires actions by key stakeholders to ensure water and wastewater infrastructure is coordinated and delivered in a timely manner to facilitate growth targets, with a specific focus on locations with the highest concentration of planned compact growth.

To achieve this, RSES objectives require a Core Strategy approach for phased infrastructure-led development in Development Plans and for Irish Water (IW) to align their Investment Plans with the settlement strategy and objectives of the RSES. To address capacity, RSES also requires Irish Water Investment Plans to address drinking water supply (under an IW National Water Resources Plan), the delivery of Strategic Water Supply projects and Strategic Drainage Area Plans. Such measures also address the EU Urban Wastewater Treatment Directive to eliminate pollution, protect and improve the quality of our water resources and environment.

To address regeneration of rural towns and villages, an important requirement of the RSES is co-ordination between local authorities, IW and other stakeholders to address Rural Wastewater Treatment Programmes and Servicing Rural Village initiatives.

Furthermore, local authorities are required to incorporate Blue Green Infrastructure (BGI) and Nature-Based Solutions (NBS) which offer opportunities to create additional infrastructure capacity as well as delivering multiple co-benefits to our society and environment.

In setting out the Development Plan Core Strategy to 2028, adherence to NPO 72 (a) to 72 (c) will be required to differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the plan. When considering zoning lands that require investment in service infrastructure, planning authorities are required to include the reasonable cost estimates of delivering required services at both the draft and final plan stages.

The RSES identifies that a safe, secure and reliable supply of energy is critical to a well-functioning Region. With projected increases in population and economic growth, the demand for energy will increase. Energy utility agencies demonstrate that our Region is currently generating more energy than demand. Transition to new renewable energy technologies and positioning the Southern Region as a Carbon Neutral Energy Region is strongly supported. In this regard, the Draft Development Plan should align with this position and elaborate on its policy approach, particularly in relation to climate action.

## 6.0 Landscape, Heritage & Green Infrastructure

*Chapter 5: Environment* of the RSES integrates sustainable economic and social development with the protection and enhancement of the natural environment. The vision is of social progress and prosperity that will be advanced by sustainable policies and objectives for developing a quality human environment and living conditions consistent with respect for the natural environment.

The RSES recognises that our economy and society are wholly dependent on the resources and services provided by the natural environment. A high-quality environment enhances our well-being and quality of life. It also offers a strategic competitive advantage in attracting enterprise and encouraging economic activity in the Region.

The RSES recognises that a policy approach based solely on environmental protection and conservation will not suffice and emphasizes that the factors of environmental progress are assembled around local economic and social motivation. The RSES promotes the recognition of 'services' provided by the natural environment in Section 5.2, where the term 'ecosystem services' is applied to the benefits derived from our ecosystem. The integration of ecosystem services into the preparation of the Draft Development Plan as per RPO 110 will be an important tool in this regard.

An advanced approach is payments for ecosystem services and examples of the Burren Programmes, river restoration projects and Upstream Thinking (UK) are provided in Chapter 5. These approaches have assisted in diversifying the rural economy and creating greater economic and environmental resilience, all of which are important themes in the RSES. There are a growing number of examples of these initiatives in our Region, particularly agri-environmental schemes and projects funded under the European Partnerships Initiative (EIP). An ecosystem services approach can ascertain what services and benefits are likely to accrue from an action or project. This can assist decision-making. Societal issues can also be tackled in such an approach e.g. the agri-environmental schemes provide a significant source of alternative income for a rural economy. This would possibly be an aspect to investigate through the Development Plan process and a policy response may emerge

The SRA welcome the emphasis on Blue Green Infrastructure (BGI) in the Issues Paper and recommends including references to Nature-Based Solutions (NBS) in the Draft Development Plan. Benefits are wide ranging and include (inter alia) food production, enhanced property values, health, climate change mitigation and adaptation, more effective management of urban flood risk, improved access, additional and more useable public open space, and improved biodiversity. It therefore affects the quality of life for everyone. It helps to define a sense of place and the character of our communities; provides important spaces for recreation with associated health and wellbeing benefits and strengthens the resilience of our natural environment to change. Protecting these assets and enhancing the benefits that they provide is integral to the future.

The RSES promotes the guidance document, *Planning for Watercourses in the Urban Environment* published by Inland Fisheries Ireland which provides an integrated watercourse protection strategy. RSES also states that spatial planning can play a significant role in ensuring that the design of developments prevent and reduce diffuse pollution, including the use of Sustainable Drainage Systems (SuDS). Development Plan policies that support these good practices are strongly encouraged.

The SRA will welcome continued engagement with the Local Authority throughout the pre-draft stage to support these concepts and through RSES implementation and learnings from the EU Interreg Europe Blue Green City project. The SRA are a partner on this project and through it, the SRA will seek to disseminate good practices and knowledge to improve GBI and NBS policy and improve their integration into projects throughout the Region.

## 7.0 Social Community and Recreation

Improving quality of life to build and safeguard inclusive communities and places is central to the ambition of the RSES and is detailed in *Chapter 7: Quality of Life*. This will require significant investment in people and in buildings and facilities as well as improvements in the performance and responsiveness of our institutions and processes.

*Section 7.1.1: Inclusive Communities and Places* emphasizes that the role of public intervention is to provide supportive policies that strengthens the fabric of communities, fosters pride of place and facilitates parity of opportunities, towards achieving sustainable and societally enriching goals. In this regard, local authorities are core agents in placemaking and this requires policy support and context in the Draft Development Plan.

The challenge for the new Development Plan will be to address the community and social infrastructure needs and wider requirements for education and healthcare to cater for an expanding and changing population profile. Reference should be made to RSES RPO 177 in *Section 7.1.2: Healthy Communities*, RPO 170 in *Section 7.1.3: Diverse and Inclusive Region*, RPO 182 in *Section 7.1.4: Age-Friendly Communities*, in particular. In the Limerick-Shannon MASP, *Section 10: Social Inclusion and Infrastructure* and MASP Policy Objectives 22 and 23 support working for social inclusion, diversity and enhancing health infrastructure.

*Section 7.1.6: Learning Region* states that learning plays a significant role in promoting social inclusion and a healthy, sustainable society. The RSES places a strong emphasis on education, skills development and lifelong learning in sections 7.1.6 to 7.1.9, with a key enabler being the establishment of an inclusive Learning Region for urban and rural centres across our Region. Building and expanding on Limerick's work as a UNESCO Learning City can develop pillars of inclusive and sustainable development that will benefit all. Promoting this culture of learning will assist in the continued success of all education and learning provisions and enhance the skills and employment opportunities for our Region's population. In preparing policy responses in the Draft Development Plan, reference should be made to *RPOs 186: Lifelong Learning*, *RPO 190: Lifelong Learning and Healthy Cities*, LSMASP PO 18, LSMASP Sections 8.9 and 10.

## 8.0 Climate Change and Flood Relief

The Issues Paper identifies that the challenges of climate change and the transition to a low carbon society is a key component of national and regional policies and is a significant cross-cutting theme to be included throughout much of the policy and objectives in the Limerick Development Plan. This is welcomed and should be reinforced in the Draft Development Plan through the adoption of robust policies to address this issue.

Climate Change is the universal challenge which will impact on our future environment, economy and the way our communities' function. Climate Action will impact many of the policies and objectives in the Draft Development Plan and as such will inform objectives in relation to flood risk management and surface water drainage, settlement strategy, transport, waste management, water services, energy, natural heritage, green and blue infrastructure, inter alia. This cross-cutting approach should be reflected in the Draft Development Plan. The need for appropriate adaptation or climate proofing measures will be necessary to ensure a comprehensive response to the challenge of Climate Change.

The RSES reinforces the National Planning Frameworks (NPF) aim to achieve transition to a competitive low carbon, climate-resilient and environmentally sustainable economy by 2031 through a strong and innovative commitment to change. This transition will require a wide range of policy responses across industry and public sectors in combination with a community response to change the way we use energy at home, in our work and how we travel. The RSES prioritises action on climate change across all economic sectors and is committed to implementing national Climate policy enacted under the Climate Action and Low Carbon Development Act 2015 (Climate Act).

The National Adaptation Framework and the Climate Action Plan 2019 are key instruments of the Climate Act developed to advance national adaptation and mitigation measures to pursue and achieve objectives for the transition to a low carbon and climate resilient economy. Future amendments to this Act will help support and strengthen climate policy to not only deliver on the transformative measures required across the sectors but also to respond to potential and required adjustments to international and EU climate ambition.

National Climate Policy is demanding of all sectors to deliver transformative and innovative climate responses to:

- a) build resilience to now inevitable effects of climate change (adaptation) and reduce the vulnerability of the State to the negative impacts of climate change.
- b) support the radical reduction of emissions and demand for energy and to deliver a scale up in emission performance across all sectors, to help support the obligations of the State to meet prescribed targets and transition objectives over the coming decade to 2030, setting a trajectory to net zero emissions by 2050.

In addition to the provisions of the RSES on climate action, appropriate account should be taken of National Climate Policy (existing and future) to ensure appropriate local level policy/objectives enable the achievement of sectoral targets that will work towards the broader national transition objectives.

Climate action is a cross-cutting consideration with an extensive scope beyond specific climate action measures. This includes support for compact growth and regeneration, support for renewable energy sectors, transition of traditional sectors - especially in energy, agriculture and manufacturing - retrofitting our buildings, support for sustainable mobility, measures supporting carbon sequestration, support for the circular economy, biodiversity enhancement and ecosystems services approaches, support for Blue Green Infrastructure, Nature-Based Solutions and flood risk management. A focus on enabling communities to engage in positive climate action should also be promoted.

The RSES recognises the need to climate proof our settlements, our built assets and our strategic infrastructure from the impacts of climate change, including severe weather events - such as flooding

and coastal erosion - that continue to cause significant disruption to our economy, our society and essential services. The integration of Blue Green Infrastructure (BGI) and Nature-Based Solutions (NBS) into policy formulation and project planning offers opportunities to reduce costs, enhance utilisation of existing infrastructure while creating a climate resilient economy. For example, the integration of Sustainable Drainage Systems (SuDS) will better manage surface water which creates greater capacity in wastewater treatment infrastructure. Stakeholder engagement through the SRAs role on the EU Interreg Europe [Blue Green City project](#) has found that there are significant gaps in know-how and practical application of BGI at a local level. A Development Plan policy response in this regard would assist in making progress.

The RSES advocates for greater economic and sectoral diversification, particularly in rural areas where it has been shown that many towns and villages are vulnerable to the effects of economic changes and shocks such as COVID-19 restrictions. The transition to a low carbon economy can offer significant opportunities to achieve sectoral diversification in these areas. However, it requires support, structures and investment. In this regard, the RSES requires that continued support is provided for the work of research and development, centres of excellence in the green economy and pilot projects. Supporting policies to implement actions through the Climate Action Regional Offices (CAROs) and Local Authority Climate Change Adaptation Strategies is important for progress in this area.

A strong body of work has been established by the *Limerick City and County Climate Change Adaptation Strategy 2019-2024*. The SRA recommends the inclusion of policies and objectives to reflect this strategy, ongoing climate action work by the local authority at local and community levels and the climate action priority areas set out in Chapter 5 of RSES for decarbonisation, climate resilience and resource efficiency as part of a transition to a low carbon economy and society.

The Draft Development Plan should provide policy support for the initiatives of the CAROs. This will align with RSES support to the role of CAROs under RSES RPO 88 which states it is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the Climate Action Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.

The Southern Regional Assembly in association with the Eastern and Midlands and Atlantic Seaboard South Climate Action Regional Offices (CAROs) will host on-line workshops concerning the effective integration of climate action policies and objectives into the spatial planning decision making process. This will assist Local Authorities in implementing our national, regional and local commitments to transition to a lower carbon and climate resilient society and economy.

## 9.0 Environmental Assessment

The Issues Paper states that environmental assessments of the Limerick Development Plan 2022-2028 are a crucial element of the process that will assess the potential environmental impacts of the implementation of policies and objectives.

The RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Limerick City and County Council use these resources to inform the Council's own environmental assessments, including mitigation measures identified to address environmental sensitivities and constraints.

### Conclusion

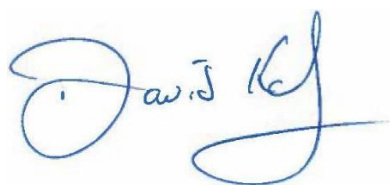
The SRA welcomes the pre-draft public consultation and commends the Planning Department for the attractive and accessible presentation of the Issues Paper.

The preparation of this next Development Plan comes at a critical stage in the development of Limerick City and County with the establishment of a Metropolitan Area and national focus on Limerick as one of five cities identified for accelerated growth and development. The new Development Plan needs to provide a robust pathway to achieve the transformative change identified in the NPF, the RSES and the Limerick-Shannon MASP.

In providing our observations, the SRA have had due regard to Section 27A of the Planning and Development Act 2000 (as amended). As the pre-draft process advances and details emerge for the Core Strategy and the distribution of growth targets within this Development Plan cycle of 2022-2028, the SRA will have further recommendations at the appropriate stages.

Further engagement between the SRA as a key stakeholder and the Planning Department of Limerick City and County Council in the development of the Draft Development Plan is encouraged. The RSES team are available for future consultation and for any clarification required regarding this submission and during the pre-draft preparation stages.

### Mise le meas



---

David Kelly  
Director Southern Regional Assembly