

shannon GROUP



**Submission to the revised Draft
Southern
Regional Spatial & Economic
Strategy**

**Shannon Group Submission
10th October 2019**

INTRODUCTION

Shannon Group appreciates the opportunity to respond to the revised draft RSES published by the Southern Regional Assembly. A number of additions to the current draft RSES are most welcome including the importance of an adequate transport network for our future economic development. The recognition in the draft RSES of key road projects including the N19 road upgrade, the R471 accessing Shannon Town and the L341 as necessary projects is important for the continued development of Shannon, the Limerick Shannon Metropolitan Area and the wider region.

The recognition in the draft document of the need to support the development of the CAV sector and the growth opportunity for the Mid-West region it generates is also welcome as is the importance of developing Smart Cities as engines for a Smart Region and seeking the deployment of disruptive technologies and smart infrastructures, as per RPO129 and PRO130 are welcome.

In this submission, Shannon Group makes specific comments on material amendment in the revised draft RSES document and seek to have these additional points considered in the next phase of the process. Some additional comments are also set out in relation to the Directors Report.

VOLUME 1

MATERIAL AMENDMENT 4

3.4 Cities- Metropolitan Areas

New RPO B: Collaboration between Metropolitan Areas

We welcome the inclusion of a new RPO that recognises the need for a collaborative approach between the Metropolitan Areas of Cork, Limerick/Shannon, and Waterford (together with Galway). This is necessary to develop a real counterpole to Dublin. However, we would be concerned with specific references to the M24. There are a number of other road projects which would be important in connecting these regions and we feel that this amended with 'key road infrastructure'.

MATERIAL AMENDMENT 65

6.3.4 High Quality International Connectivity

RPO 145: High Quality International Connectivity - Airports

RPO 145b

We welcome the inclusion of the new RPO 145b. However, we suggest this is expanded to include the following additional text:

- b. Continued support for improved international connectivity through the role of our region's airport assets, support for the sustainable development of infrastructures ~~and the safeguarding of safety zones.~~ **taking into consideration Airport Public Safety Zones and the findings of the ERM Report "Public Safety Zones, 2005" along with**

general Airport Safeguarding and in particular the Obstacles to aircraft in flight Order, 2005 (S.I.No. 215/2005) and EASA Regulation (EU) No 139/2014.

RPO 145d

It is welcome to see the RSES recognises the need to support strategic route development for airports outside of Dublin and support extension of Regional Airports Programme. For clarity it would be beneficial to highlight that the extension of the Regional Airports Programme should cover to all airports under 3 million passengers as permissible under EU guidelines.

- d Support the extension of the Regional Airports Programme [to all airports under 3 million passengers as permissible under EU guidelines](#) (RPO 145d)

RPO 145e

The revised draft RSES identifies the need to seek strengthened sustainable multi-modal transport access to airports (RPO 145e). We welcome this new addition but believe that it needs to be expanded on and particular attention needs to be focused on ensuring better direct inter-regional connectivity between the cities on the Atlantic Corridor and Shannon Airport. Greater levels of direct inter-regional connectivity are critical, particularly linking Shannon International Airport to the cities of Galway and Cork. Given the focus in Ireland 2040 on enhancing regional accessibility and recognising that bus is the main form of public transport used in Ireland today, and is likely to be the predominant form of public transport in the coming years, ensuring appropriate levels of direct inter-regional connectivity should be a priority.

Shannon is the only airport in the West of Ireland to provide connectivity to strategic transatlantic hubs which will be critical to enabling economic development in the second-tier cities of Limerick, Galway and Cork a priority of Ireland 2040. While Shannon Airport benefits from Bus Éireann services to Galway, currently only five of these services per day are direct expressway services but which do not coincide with flight times, thus creating a disincentive to use public transport to and from the Airport. Moreover, there is currently no direct public transport connectivity between Cork and Shannon which is a barrier to the effective development of the region. Taking account of this, we would ask that the RSES recognises the need to address this issue with the following RPO.

- e Enhanced direct bus transport connectivity to and from Shannon Airport from Galway and Cork is critical to future growth and sustainability. (RPO 145e and 163)

MATERIAL AMENDMENT 66

6.3.5 Regional Policy Objectives for the Integration of Transport Planning with Spatial Planning Policies

RPO 146: Integration of land use and transport integration

The proposed changes to RPO 146 raises concerns on two fronts.

Firstly, in relation to residential development and taking account of the significant housing shortage currently being experienced nationally, we believe that it may be more appropriate to revert to the previous language which sets out that development **should** be sequential **to the extent possible**.

- ~~To the extent possible~~, residential development ~~should~~ ~~shall~~ be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised

Secondly, in relation to non-residential development, the following objective should be amended to recognise that some strategic employment locations currently do not have adequate bus frequency to facilitate a limit on car parking provision. We suggest that the objective is amended to include where practicable.

- ~~Where practicable~~, all non-residential development proposals ~~shall~~ ~~should~~ be subject to maximum parking standards as a limitation to restrict parking provision to achieve greater modal shift

MATERIAL AMENDMENT 77

6.3.6 Transport Investment Priorities

RPO 163: Bus

The proposed amendments to RPO 163 in relation to buses in Section 6.3.6 are also welcome; however, we believe this needs to be expanded to include expanded direct inter-regional bus services between the cities and key access points such as Shannon Airport as suggested for RPO 145e

LIMERICK-SHANNON MASP

MATERIAL AMENDMENT 123

1.4 Shannon

Limerick Shannon MASP Policy Objective 3: Shannon

We would ask that the Objective 3b is expanded to incorporate the ambition of a micro smart city in Shannon and as recommended in the Directors report,

- It is an objective to seek investment to deliver a Connected and Autonomous (CAV) R&D testbed ~~and micro smart city infrastructure~~ in Shannon.

We would also ask that Objective 3 is expanded further to include a sub-objective 3d which would:

- ~~Seek sustainable infrastructure investment and support masterplan implementation of the Shannon Free Zone as a strategic regional economic driver in the Limerick Shannon Metropolitan Area Plan~~

We believe this sub-objective is important for the overall development of Shannon as a more diversified employment base in the Limerick-Shannon MASP and for the wider southern region will be important to the economic development of the region and achieving the objectives of Ireland 2040. We welcome the recognition in the RSES of the important role played by the Shannon Free Zone in the economic development of the MASP and Mid-West and the need to ensure appropriate utilities infrastructure to support its continued development. As one of the largest multi sector business park in Ireland, accommodating a variety of sectors from aviation, manufacturing, engineering, and distribution and more

recently the emerging Connected and Autonomous Vehicle (CAV) sector, the Shannon Free Zone has a key role to play in supporting a more diversified employment base.

We would also ask that that the range of sectors in the SFZ and across the Limerick-Shannon MASP is highlighted to a greater degree and that an addition to Limerick Shannon MASP Policy Objective 3a would be expanded to highlight other sectors as follows:

- The Limerick Shannon MASP recognises Shannon and its assets as a significant regional strength and employment centre. It is an objective to support and promote Shannon as a centre for research and development for autonomous vehicles which will complement Shannon’s role as a world leader in aviation and aerospace, [engineering, manufacturing and distribution](#)

MATERIAL AMENDMENT 124

4.1 Transportation

Limerick Shannon MASP Policy Objective 6B: Sustainable Transport

We welcome the expansion of Objective 6B however, we believe that this does not go far enough and fails to see the importance of connecting Shannon to Limerick City Centre, UL and LIT. Shannon is unique in having a population of approximately 10,000 people but critically having a daytime population of 18,000. Many of those working in Shannon travel from Limerick.

Frequent, fast and reliable local bus services are critical to the effective functioning of the metropolitan area. Currently the public transport provision to Shannon is not sufficient to cater for an increasingly young and car free workforce. Ensuring that the public transport network can provide higher frequency services with shorter and reliable journey times and more direct services will be important to ensuring that bus services are considered a viable option for commuters. Likewise ensuring ease of interchange within Limerick City and direct connectivity with key locations such as LIT and UL is vital to supporting more sustainable transport within the metropolitan area.

Bus Eireann local bus 343 connects Shannon Airport with Limerick City and operates 24 services daily taking approximately 50 minutes. A higher frequency and faster service between the city and the airport and industrial estate should be prioritised for the region. Whilst it is recognised that the Transport Strategy for the Limerick Shannon MASP is still being developed, we suggest that the sustainable transport initiative for the Limerick Shannon MASP Policy Objective 6B should be expanded further to include the following:

Suggestion

- **Develop an extensive bus network across the Metropolitan Area with longer operational hours and increased frequencies to encourage the significant modal shift from the private car to sustainable transportation.**
- **Improved sustainable transport links between Shannon and the city centre, University of Limerick and LIT**

MATERIAL AMENDMENT 130

6.2 Employment Generation

Limerick Shannon MASP Policy Objective 9: Strategic Employment Locations

We would ask that the Objective 9b is expanded to incorporate the ambition of a micro smart city in Shannon and as recommended in the Directors report,

- It is an objective to seek investment to deliver a Connected and Autonomous (CAV) R&D testbed **and micro smart city infrastructure** in Shannon.

6.4 Shannon International Airport

Limerick Shannon MASP Policy Objective 11: Shannon Airport

We welcome the recognition in the draft RSES document of the critical role of Shannon Airport, we note that no material amendments have been made to this section. We hope that some additional information on Shannon Airport might be worth highlighting in the Limerick Shannon MASP including:

Shannon International Airport is the second largest airport in Ireland. The Airport has the longest runway in the country allowing it to cater for fully laden flights to Asia and South America and is the only airport in the country to operate with no flight time restrictions. It was also the first Irish airport to offer US Customs and Border Protection Preclearance facilities to passengers travelling to the USA.

We would also advocate that the Limerick Shannon MASP highlights the need to support the sustainable development and seek investment in its infrastructure and its surrounding land bank to act as a catalyst for economic growth in the region. Likewise, supporting the sustainable development of enhanced public transport connectivity to the airport including improved direct bus services from Galway and Cork to Shannon, improved local bus transport connectivity within the metropolitan area and improvements to the N19 and R471 roads are critical for Shannon Airport.

MATERIAL AMENDMENT 134

6.8 Tourism

Limerick Shannon MASP Policy Objective 15: Tourism

The proposed amendments to Objective 15 are welcome. Tourism represents one of the strongest means by which balanced regional development can be achieved and Ireland 2040 rightly recognises that tourism has the capacity to sustain communities, create employment and deliver real social benefits for rural Ireland. In their 10 Year Strategic Vision, Fáilte Ireland reiterates the importance of the tourism industry in developing rural economies and contributing to spatial balance in Ireland. Accordingly, an increased emphasis of tourism policy in Ireland has been to facilitate greater regional spread of tourism across Ireland and to extend the tourist season as a means of ensuring a sustainable growth model.

Bunratty Castle and Folk Park is a flagship tourist attraction for the Mid-West with potential for further expansion and to build on its international reputation to become a major attraction of scale. Bunratty Castle and Folk Park is currently undertaking a Masterplan

project to regenerate the attraction and this should be supported by the RSES. Therefore, we would ask that an additional RSES objective that would support this ambition would be to recognise the need for transformational visitor attractions in the Mid-West region.

- Facilitate Visitor Experience Development including capital investment in flagship tourism products that can create an attraction of scale in the Mid-West.

ADDITIONAL COMMENTS

Key Growth Enablers for the Limerick Shannon MASP

We note the expansion of key growth enablers in the Limerick Shannon MASP as identified in the Directors Report. We would ask that in addition to the enablers set out, that the following would also be considered:

- Development of the SFZ Masterplan.
- The continued expansion of the City's third level institutions and the NUIG Shannon College of Hotel Management along with integration with the wider City and region.
- Delivering ambitious, large-scale, mixed-use enterprise regeneration projects in the Shannon Free Zone including transformative initiatives such as the development of a micro Smart City infrastructure.
- Development of a Connected and Autonomous (CAV) R&D testbed and micro smart city infrastructure in Shannon



*This document is submitted by
Caroline Kelleher
Director of Public Affairs
Shannon Group plc
Shannon Airport
Co Clare*