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CONTAE AN CHLÁIR | COUNTY COUNCIL

Submission from Clare County Council on the Draft Regional Spatial Economic Strategy for the Southern Region

Dear David,

I welcome the opportunity to comment on the 'Draft Regional Spatial and Economic Strategy for the Southern Region' (RSES). Clare County Council has consulted widely with our Elected Members and SPCs on the document. The comments below reflect the detailed and considered input of the Elected Members, Strategic Policy Committee and Executive of Clare County Council.

The format of this submission is to provide an initial strategic/high level commentary on the draft RSES, followed by a number of more detailed comments on individual issues.

At the outset, Clare County Council recognises the importance of the Regional Spatial and Economic Strategies following on from publication of the National Planning Framework under Project Ireland 2040 in February 2018. The Council sees Regional Spatial and Economic Strategies as heralding a new era of developing public planning policy in Ireland and the merging of economic and spatial planning in a visionary plan-led manner. Noting also that the RSES will form the basis for implementation structures and mechanisms, Clare Council considers the final RSES document should be ambitious, positive and realistic, enabling Counties and regions achieve their ambition whilst also being capable of achieving 'early-wins' from a planning and economic development perspective.

In particular, Clare County Council welcomes the inclusion of supporting text and objectives to key national enablers and strategic assets - projects in County Clare which have the potential to unlock significant economic opportunities for Ireland - in particular, to support the implementation of the Ennis 2040 Spatial and Economic Strategy, to support for the planned South Clare Economic Strategic Development Zone (SDZ); the early delivery of Limerick Northern Distributor Road (LNDR); the support for the Moneypoint and Cahercon deep water development opportunities through the implementation of the SIFP for the Shannon Estuary; the maximising opportunities for Shannon Ireland's only new Town and Shannon International Airport, all set within a County which has a spectacular heritage and quality of life.

In welcoming the overall vision for County Clare and the Limerick-Shannon Metropolitan Area, there are a number of amendments that are requested that will ensure County Clare maximises the opportunities from its natural and infrastructural assets and opportunities, achieves our potential and can, through our people and access to talent, deliver early and sustainable economic wins for the RSES.

Population

The National Planning Framework sets out a radical rebalancing of Ireland's spatial strategy. The three RSES will be central to ensuring this radical rebalancing actually occurs. The NPF Roadmap (July

Oifig an Priomhfheidhmeannach

Office of the Chief Executive

Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2

2018) assigned a maximum population growth of +18,000 to County Clare to 2031. The Clare Target population of 137,000 necessarily implies the acceptance of a growth rate of 0.8% per annum over the fifteen years 2016 to 2031. This should be compared and reconciled with an actual rate of growth for Clare County over the period 1991 to 2016 (25 years) of 1.2% per annum.

The table below sets out the comparisons (from the CSO) of growth rates of Counties, showing clearly that that the population growth County Clare was the highest in the Mid- West and the 4th highest in the Southern Assembly area.

TABLE 3.2 AVERAGE ANNUAL POPULATION GROWTH BY COUNTY AND PERIOD

	1991-1996	1996-2002	2002-2006	2006-2011	2011-2016	1991-2016
Carlow	0.3	1.8	2.4	1.7	0.8	1.6
Dublin	0.6	1.0	1.4	1.4	1.1	1.2
Kildare	2.0	3.6	3.4	2.6	1.1	3.2
Kilkenny	0.5	1.1	2.2	1.8	0.8	1.4
Laos	0.2	1.8	3.5	4.0	1.0	2.5
Longford	-0.1	0.5	2.7	2.7	0.9	1.4
Louth	0.3	1.7	2.3	2.1	0.9	1.7
Meath	0.8	3.7	5.4	2.6	1.2	3.4
Offaly	0.2	1.3	2.8	1.6	0.3	1.3
Westmeath	0.5	2.2	2.6	1.7	0.5	1.7
Wexford	0.5	2.0	3.2	2.1	0.6	1.9
Wicklow	1.1	1.9	2.5	1.7	0.8	1.9
Clare	0.7	1.6	1.9	1.1	0.2	1.2
Cork	0.5	1.1	1.9	1.6	0.9	1.3
Kerry	0.7	0.8	1.4	0.8	0.3	0.8
Limerick	0.4	1.0	1.2	0.8	0.4	0.8
Tipperary N.R.	0.1	0.9	2.1	1.3	0.3	0.9
Tipperary S.R.	0.2	0.8	1.3	1.3	0.1	0.8
Waterford	0.7	1.2	1.6	1.1	0.5	1.1
Galway	0.9	1.8	2.7	1.6	0.6	1.7
Leltrim	-0.2	0.5	3.1	2.0	0.1	1.1
Mayo	0.1	0.9	1.4	1.1	0.0	0.7
Roscommon	0.0	0.6	2.3	1.8	0.1	1.0
Sligo	0.4	0.7	1.2	1.5	0.0	0.8
Cavan	0.1	1.1	3.3	2.9	0.8	1.8
Donegal	0.3	1.0	1.8	1.9	-0.3	1.0
Monaghan	0.0	0.4	1.6	1.6	0.3	0.8
State	0.6	1.3	2.1	1.6	0.7	1.4

It is clear from this table and past performance, that Clare is capable of a significantly higher rate of growth than is envisaged by its NPF target. This disparity, when taken with the fact that 49% of the Limerick-Shannon MASP is located in Co. Clare and that Clare has key strategic and urban locations such as Shannon Town and strong settlements in the metropolitan area of Limerick city clearly demonstrates that the above population allocation is completely inadequate to facilitate the reasonable expected growth levels across Clare.

In seeking to provide a solution to the population issue, Clare County Council notes the statement in the NPF Roadmap that *“Scope for [further] headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national*

average baseline (i.e. Cork (City and County), Dublin (all four local authorities), Galway (City and County), Kildare, Limerick, Louth, Meath, Sligo, Waterford, Westmeath, and Wicklow.”

Whilst we note that Clare County is not explicitly included in this list, it is our clear understanding that as it forms part of the Limerick-Shannon Metropolitan Area County Clare’s inclusion is implied. Indeed when compared to Cork and Galway city and metropolitan areas, geographically the Metropolitan Area of Limerick is unique because it includes a large spatial area located in County Clare including the major employment and centre of Shannon with a population of 10,000. Consequently, given that Clare has exhibited a consistent highest level of population growth in the MidWest it is reasonable and justifiable that provision should be made for an additional 25% headroom in the Clare part of the Limerick-Shannon Metropolitan Area, which comprises a number of strong urban settlements. This is also justifiable in the context of the focus of economic and population growth in urban centres along the Limerick- Shannon-Ennis-Galway corridor and Atlantic Economic Corridor (AEC).

Clare County Council requests that the RSES explicitly state that the additional 25% population headroom stated in the NPF Roadmap is assigned to the County Clare area of the Limerick-Shannon Metropolitan area. This additional population allocation will ensure that there is sufficient opportunity to realise the ambitious growth envisaged for County Clare out to 2031. This statement is necessary to provide the clarity required in the RSES for future Core Strategies, zoning provisions and would redress to some extent the restrictive allocation for County Clare in the NPF Roadmap.

South Clare Economic SDZ

The Clare County Development Plan 2017-2023 zones the University of Limerick – Clare Campus and the hinterland of the campus as a strategic economic development zone. The zoning is logical in the context of the previous expansion of the University across the river Shannon into County Clare (Clare currently accounts for 40% of UL’s Campus footprint) in 2001 and its continued expansion in the county in the eighteen years to 2019. The zoning of the site since 2007 reflects the economic impact of universities worldwide on their hinterland, the inevitable and necessary development of UL at this campus and the vital role of the University in contributing significantly to the future development of Limerick City, the Limerick- Shannon Metropolitan Area and the Southern Region.

The scale of the zoned site and its integrity as an entity dictates that the site is best master planned and developed in a plan-led manner as a Strategic Development Zone (SDZ). With this designation the site will facilitate a significant FDI R&D presence as part of UL’s education and research offering and will provide UL with the capacity to become an ‘educational game changer’ both regionally and nationally. Orderly and planned development, as envisaged in the legislation enabling the designation as a Strategic Development Zone, will enable the site to generate 3,500 jobs with additional employment being generated in the construction phase and subsequent spin-off developments. Importantly, the SDZ designation will allow foreign and indigenous industry investment to partner with the University in expansion, placement, research and careers, based on an ‘Academy model’ of learning.

The SDZ will lead to an economic resurgence that will generate an additional population living within Limerick city and surrounding local settlements. The impact on Shannon International Airport will be significant as the SDZ will focus on international partnerships. From a European perspective this is a project of scale. From a national perspective this is an exemplar project enabling an early start to the balanced regional development strategy as set out in the National Planning Framework – Ireland 2040 and the National Development Plan. The SDZ designation and its implementation will be an early economic and planning early win for the Limerick-Shannon Metropolitan Area, contributing

greatly to balanced regional development and statement of intent for the first Regional Spatial and Economic Strategy.

Clare County Council welcomes the significant endorsement of this this plan-led economic development by the Southern Regional Assembly and its Members' in the draft RSES document.

Recognising the significant and tangible national economic, social and educational benefits of the proposed SDZ, in addition to requesting the existing text and objectives in the Draft remain, Clare County Council requests that the South Clare Economic SDZ would be specifically identified as a 'National Enabler' in Section 3.0 of the Limerick-Shannon MASP.

I refer to pg 36 of the Draft document under the heading of Employment and Enterprise and the reference to the "South Clare Economic Strategic Development Zone in UL". I request that the term "opportunity for" be omitted. The University of Limerick and Clare County Council are fully committed to the designation and delivery of a Strategic Development Zone at this location. The Limerick Northern Distributor Road should also be included here as this will be a key national piece for infrastructure for the delivery of the SDZ and the enhancement of sustainable transport options for Limerick City.

Limerick Northern Distributor Road

LNDR Clare County Council welcomes the references on the LNDR in the RSES, however we request that the LNDR should be highlighted further throughout the Limerick-Shannon MASP. The Limerick-Shannon Metropolitan Area should be amended to include the LNDR as one of the main strategic road infrastructure priorities for the Southern Region and because of its linkages between the University of Limerick and County Clare. Additional text should be inserted in the final RSES to prioritise the LNDR as a Strategic Investment Priority for the Limerick- Shannon MASP and, due to its importance to the sustainable growth of Limerick City, the fast-tracking of the LNDR as a vital piece of infrastructure should, in addition to the SDZ referred above, be identified as a 'national enabler'.

Ennis

As the principal administrative and commercial centre of County Clare, Ennis has developed a reputation for doing business based on a highly skilled population base, high quality telecommunications infrastructure and excellent connectivity to the national motorway and rail network. Other attributes include an excellent quality of life, affordable housing and high-quality recreational opportunities, all set against the backdrop of a beautiful County.

Ennis is at the heart of the economic and enterprise development of Clare. There is strong potential for further employment-generating development in the Ennis and environs area. As the largest town in Munster and due to its location as part of the AEC on the Limerick-Shannon corridor, Ennis is a key driver for regional growth. Moreover Ennis provides as a functional linkage between the Southern Regional Assembly Area and Galway city and ideally placed to drive ambitious population and economic growth.

I welcome the identification of Ennis as a Key Town, and the reference to a number of key attributes and opportunities, including the reference to potential for a large scale Datacentre and supporting enterprises. In order to fully capitalise upon the opportunities and to ensure that Ennis and its environs has a clear economic vision and continues to prosper, a number of amendments to the Draft RSES are required.

I refer to pg. 50/51 of the Draft document and I would request that additional text in relation to Ennis 2040 would be inserted to ensure that the plan led vision for Ennis and its growth into the future is given adequate prominence and recognition. Ennis 2040 will set the long-term economic strategy for the County Town with an agreed focus on an economic future and spatial pattern to 2040 and beyond.

- I would specifically request that the final RSES document references and specifically supports 'Ennis 2040' as a specific objective under RPO14.
- I note that there is an error in the population of Ennis Town as recorded on Table 1.3 on pg. 15 of the Draft RSES, where it indicates that the population is 11,381 when the actual population is 25,276. I request that following "synergy and connection between Ennis and Galway" the following text is inserted 'This region with four extensive populated areas, creates a city of scale and lies at the central core of the AEC'.
- I request that there are additional attributes that Ennis possesses which warrant inclusion in the final plan. These include the key economic opportunity sites as identified in the Clare CDP 2017-2023 which includes a brownfield town centre site "the Former Boys National School" and I am requesting that this site be listed as an attribute in the final plan. Moreover the potential for Ennis to be branded as a Low Carbon Town should be explored.
- I refer to the attribute listed as "Ennis General Hospital" and I request that this attribute would be expanded upon to include and request additional services offered in particular the reinstatement of 24-Hour A&E line with the NPF The HSE currently have a site in Ennis Town - St. Josephs Hospital, which provides elderly care and has an elderly care day hospital service for Co. Clare. There is a large campus area with other health services located on site. Given the strategic location of this town site and give the size and scale involved I consider that its potential redevelopment should be listed as an attribute on pg 51.
- Attribute recognition to Ennis and its role as a gateway to key Tourism sites in the region including Irelands second most visited tourist attraction The Cliffs of Moher who had 1.58 million visitors in 2018, The Wild Atlantic Way and the Burren and Cliffs of Moher Geopark. This along with Ennis being a hub for culture and heritage and with a recognised high quality of life is a key attraction that I wish to have recognised in the RSES and in particular in RPO14.
- I welcome the inclusion of the "Roche site, Clarecastle – 23 Ha. brownfield site" as an attribute of Ennis. I request the inclusion of the following text in relation to this site in the final RSES document 'This site is a strategic site for future development of Ennis and hinterland". I request that the "Information Age Park Opportunity Site" would be replaced by the re-branded name 'Clare Technology Park'.
- In recent weeks Ennis has secured a Higher Education presence in the town with LIT confirming that it is to open a new campus on foot of a capital investment of €0.75 million by Clare County Council. I am requesting that RPO14 recognise this High Education Growth Potential as a specific objective for Ennis.
- Building on the Higher Education presence achievement in Ennis, there is a vision for the town to become a Life Long Learning centre. I request this would be included as an objective for the town under RPO14.
- Ennis has been successful in URDF funding applications for public realm works and plans in 2018. These along with several public realm projects which the Council is working on currently, demonstrates a commitment from Clare County Council to urban regeneration and improvements to public realm. I request that RPO14 would include an objective for the support of urban regeneration through investment in Ennis Town Centre and initiatives to improve public realm and regenerate underused and brownfield land in the town.

- I request that RPO14 would also include a specific objective for investment in sustainable transport including the provision of a Town Bus Service for Ennis and the development of a Local Transport Plan including a Mobility Management Plan.
- I am aware that Failte Ireland is about to announce a new capital programme to develop destination towns in each Local Authority. I consider that reference should be made to Ennis being identified as such a town.
- I request that reference be made to the potential requirement to relocate Clarecastle barrage downstream and support should be given to the investigations require around the feasibility of this proposal.

Shannon International Airport

Shannon is known globally as a major innovator in the development of the aviation industry, for its historical significance and also the global reach of its diaspora. It was the first airport in the world to trade Duty Free goods and is only one of two airports outside the Americas to offer full US Customs and Border Protection Preclearance facilities to passengers travelling to the USA. Accessed by the M18 Motorway, Shannon International Airport is the second largest airport in Ireland with a capacity of 4.5 million passengers annually and is the only airport in the country to operate with no flight time restrictions.

Shannon is the closest long-haul airport for 40% of the State's population, including the catchments of Galway, Ennis, Limerick and Cork, as well as the principal gateway for the Wild Atlantic Way. The direct, international connectivity provided by Shannon Airport has been a critical factor in the decision of many multinationals to base operations in the Midwest and adjacent regions. As a result, Shannon's catchment area is home to the largest concentration of multinationals outside Dublin. Shannon airport has the largest cluster of aviation and aerospace industry in the country encompassing more than 50 companies.

However proactive intervention at a national aviation policy level is required to target, in a sustainable manner both through policy support and fiscal incentives, the investment for strategic route developments and the rebalancing of the rate of growth from Dublin air traffic to the regions(Shannon and Cork). Air Traffic and connectivity via Shannon International Airport is significant driver of effective regional policy to act as a counter-balance for Dublin and the support for funding mechanisms for strategic route development to airports outside of the Capital(in particular into a EU Airport hub) should be identified in the RSES.

Clare County Council welcomes that the RSES supports the utilisation of the existing investment in Shannon International Airport and I request that the RSES also supports the continued sustainable development and investment in Shannon International Airport's land bank, zoned in the Shannon Town Local Area Plan to act as a catalyst for economic growth in the region.

I request that all the references to the airport at Shannon be referred to as 'Shannon International Airport'.

The upgrade of the N19 road to Shannon International Airport along with the upgrade of the R471 accessing Shannon Town will be critical to the future development of Shannon Town, International Airport and the MASP area. In addition, significantly enhanced bus connectivity incorporating local services within the MASP and improved direct services from Galway and Cork to Shannon is a key ambition and enabler for further growth.

Shannon as the home of JaguarLandRover's(JLR) Research and Development Intellectual Property should be identified in RSES as the southern region's connected autonomous vehicle's(CAV) test bed and proving ground. This request should be included in a RSES RPO.

Shannon Town

With a permanent population of c.10,000 and a daytime working population of c.18,000 Shannon Town is one of the largest settlements in the Southern Assembly Area and is the economic and international gateway of the Limerick-Shannon Metropolitan Area. While noting references to Shannon in the document Plan, there needs to be far greater emphasis to Shannon in the Limerick-Shannon Metropolitan Area Strategic Plan in particular relating to National enablers and Strategic Objectives and also Housing and Regeneration. There are significant assets and companies in Shannon Town which warrant inclusion in the document eg Westpark Business Campus home to over 50 global and national business, complementing the Shannon Commercial Properties and indigenous industries in the town.

The requirement to create a sustainable urban design for the Shannon new town should be identified through the development of an Action Area Plan for Shannon Town Centre creating a sense of focus arrival at the town centre. Consideration should be given to investigating initiatives to encourage regeneration of existing, occupied residential areas that would greatly benefit from site based regeneration. I request that locations within the MASP boundaries such as Shannon town would be the focus of this regeneration programme and a commitment to this should be provided for in the final RSES document.

Significantly enhanced bus connectivity incorporating local services within the MASP and improved direct services from Galway and Cork to Shannon is a key requirement that need to be included in the RSES as is the long-term rail connection is a key ambition and enabler for further growth.

Marine and Coastal Assets

I refer to your reference on pg 107 to the Cahiracon Marine Related Industry site and can confirm that the Clare MEZ (Maritime Economic Zone) project for Cahiracon was successful in the Regional Enterprise Development Fund (REDF). This is an initiative by Clare County Council to provide specialist infrastructure, accommodation and development space for a range of different maritime-related niche businesses. The aim of the facility will be to provide mandatory maritime training courses and value-added training for non-seafaring personnel taking up positions at sea. Clare County Council requests that the terms "wave and off-shore renewable energy test-site" would be referenced also in Cahercon.

I am requesting that a RPO be inserted to read as follows "It is an objective to support The Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary to include the promotion, marketing and seeking of financial and special expertise support for the plan and specific projects emerging therefrom".

I request that RSES contain greater emphasis on the role and opportunities for off-shore wave and wind renewable energy in the Shannon Estuary and specifically off the west Coast of Clare, reflecting the key natural assets of wave and wind energy, together with the presence of grid- connections.

I refer to pg 146 and request that additional text would be added to RPO137, whereby the development potential of strategically located ports such as the deep water ports at Moneypoint and Cahiracon in line with the recommendations of the SIFP for the Shannon Estuary would be supported.

Atlantic Economic Corridor

I consider that there is insufficient reference to how the region sits within the Atlantic Economic Corridor, which includes Clare and Limerick within this region. I would welcome revised text to promote the role of the AEC at a Regional and Sub-Regional level.

I refer to the RSES Strategy Map as set out on Pg 31 and I have concerns that there are key strategic roads across Co. Clare which have not been identified, in particular the R352 and R463 linking Ennis east to Portumna and to the M7 via Killaloe . I also note that the ferry running from Killmer in Co. Clare to Tarbert in Co. Kerry has not been shown. I request that a revised map would be prepared where these strategic transport lines are shown.

Public Transport

Clare County Council encourages increased usage of public transport thus reducing emissions and traffic congestion.

Investment at all stations in the development of the western rail corridor (Limerick to Sligo) is important in terms of enhancing the economic and social development of the region - the upgrading of the rail infrastructure at Ballycar (currently prone to flooding) is critical in this respect and is a government priority.

Provision of Bus services between Ennis / Shannon and Shannon / Limerick and their coordination with onward Train services, Educational establishments' start/end times and Industry start/end times is seen to be of great importance in encouraging people to use bus and train services as an alternative to the private car.

Provision of a dedicated bus service serving only the Airport should be considered i.e. an Air coach type service with services from Galway, Ennis and Limerick. Travel times for scheduled services at present may discourage use by the public as they stop at other destinations.

Upgrades to the bus and train stations in Ennis and Sixmilebridge are required to be included in the Strategy. The expansion of the bus service to Shannon from Sixmilebridge Station should be in the strategy as the current timetable from Sixmilebridge is limited in extent.

RPO 87, 88 and 89. A strategy for changing to electric or renewable fuel vehicles and include a timeframe for the changeover is required together with a need to also explore the extension of network of charging points. The provision of charging points in rural locations, along tourist trails is also of critical importance.

RPO 155 – reference should be made to car sharing initiatives, in particular the idea of hiring out cars on an hourly / daily basis.

Infrastructure

A Drainage Area Plan is required for Ennis Town which will lead to wastewater infrastructure solutions for the area, and will identify projects required to protect the environment and facilitate social and economic development. This should be added to the list of Drainage Area Plans in Section 8.1 RPO 200, 201, 202 Water Supply should include

- North Clare Tourism Area water supply deficit, the Ballymacraven reservoir is undersized and should be listed as a project.
- It should include investment drought mitigation measures

In terms of the development of rural towns and villages RPO 205 should refer particularly to rural wastewater treatment programmes in towns and villages that currently have no wastewater infrastructure, examples in County Clare are Broadford, Cooraclare, Doolin and Carrigaholt.

Currently Irish Water's capital investment is limited to focussing only on areas which have existing water and wastewater assets.

The provision of the following national road projects must be delivered up to 2027 and should be included in RPO 159:

- N85 Kilnamona realignment
- N19 Shannon Airport approach road
- Bypass and bridge crossing linking the N85 to the N67 at Ennistymon

In terms of investment in national regional and local roads (RPO 160) the following initiatives should be included:

- The Killaloe Bypass, Shannon Crossing, and the R494 upgrade is one scheme
- The Limerick Shannon Metropolitan Area Transport Strategy currently under preparation
- Ennis Northern Inner Relief Road/LIHAF connecting N85 roundabout at Claureen to the junction of Lees Road and Drumcliffe Road junction
- N68 Caherea realignment
- N68 Moyadda realignment
- Relief Road from N68 Ennis Road at Kilrush to the N67 Killimer Road at Kilrush
- Kilkee ring road linking the N67 to the R487 and L2008
- Relief Road from N67 northeast of Lahinch to the N67 south of Lahinch
- Relief Road from N67 south of Miltown Malbay to the N67 northwest of the town
- Relief Road in Corofin
- Road infrastructure in Doolin

Throughout Clare there are a number of areas that require flood defence and relief works some of which have been prioritised in the published CFRAMs Flood Risk Management Plans and various minor works schemes.

Towns and Villages

Clare supports the Assembly's vision for Towns and Villages as set out in RPO24. The success in identifying towns and villages and allocating growth to same will be dependent on each county having a sufficient population growth rate assigned to them in the final document(see population para). In addition the provision of adequate water and sewerage services to facilitate growth must be made and I request that the RSES would address the need to fund the Irish Water programme of Works relating to making services available/ upgrading of existing services in rural towns and villages.

The concept of linking settlements is also welcome reflecting the approach of Clare County Council as set out in the Clare County Development Plan 2017-2023 and the Clare Rural Strategy

Networks

I refer to pg 73 and in particular to your reference to "North Kerry/West Limerick/ Shannon Estuary". Given that the strategic assets listed (Cahercon and Moneypoint) are located in Co. Clare and given that Co. Clare is a lead partner in The Strategic Integrated Framework Plan(SIFP) for the Shannon Estuary along with Limerick City and County Council, Kerry County Council, Shannon Group and Shannon Foynes Port Company I request that this network title should be revised to include Co. Clare and that the importance of the Shannon Estuary and of the SIFP would be strengthened. Reference to *Clarecastle - Kildysert - Kilrush - Cappagh* as a Shannon Estuary coastal network should be included. I welcome RPO32 and consider that this vision for delivering compact growth through rejuvenation will make real changes to our existing towns and villages across the region. I request that the term "regeneration" should also be inserted into this objective.

I refer to Chapter 4.5 and I would like to highlight as best practice 'Digiclare' - is a new initiative of Clare County Council as part of its Rural Development Strategy to support rural communities by providing flexible, affordable and local office facilities and high-speed broadband connectivity in rural locations in County Clare. The first three digital hubs were opened on Friday 2nd March 2018 and the first tenants occupied the properties on Monday the 5th of March. These facilities utilise broadband and digital technology as a key enabler of Rural Development. The digital hubs will support rural social enterprises and the wider community by facilitating e-working, small-scale training and conferencing. The first of these digital hubs are in Kilrush, Feakle and Miltown Malbay.

Rural Areas

In the absence of revised Section 28 Rural Housing Guidelines I would like you to note concerns regarding the ambiguity of the language used in PRO25 and its variance from the NPF and specifically the "demonstrable economic, social or exceptional need to live in a rural area".

Rural Innovation

I refer to the Good Practice Example listed on pg 90 of the Draft RSES and I highlight that Clare County Council were successful under the URDF where €1,023,300 was allocated towards the development of a Multi-Service Innovation Centre in the heart of Ennistymon. The Ennistymon project involves the conversion of a long term vacant building on Parliament Street into a Multi-Service Innovation Centre which will comprise a Digital Hub with business broadband, a family resource centre and community amenities meeting a key target under the Clare Rural Development Strategy. This Multi-Service Innovation Centre is scheduled to open in the coming months. I consider that this example of rural innovation merits inclusion as Good Practice.

Tourism

I refer to the Mid West Urban and Rural Tourism Assets summary on pg 94 and I highlight the following assets which should be included in RSES - The Wild Atlantic Way, Cliffs of Moher – Ireland's Favourite Visitor Attraction 2019 (Irish Independent) and Ireland's second most popular tourism attraction with 1.58million visitors in 2018.

The reopening of the Errina Canal linking Limerick City with the R. Shannon and inland waterway system to the Ulster Canal system and Northern Ireland is a significant national tourism and rural development opportunity in a post-Brexit Ireland that should be specifically referenced. When taken together with the opportunities at Ardnacrusha for its reimagining as a Tourism or interpretative centre, the reopening of the Errina canal needs to be specifically referenced in RSES as key tourism opportunity.

The West Clare Railway Greenway linking Ennis to Kilkee is a critical walking and cycling corridor linking the Ennis County Town to the Wild Atlantic Way. This supports RPO 192 and 193.

Growing the Blue Economy

There is significant potential in both the Shannon Estuary and the West Coast of County Clare to grow the Blue Economy and I am requesting that reference be included to the potential for that growth in both areas.

Clare County Council elected members have indicated their opposition to the use of Natural Gas sourced through fracking. It is requested that this sentiment be included in the text of the plan.

Limerick-Shannon MASP

I refer to the Limerick Shannon MASP description set out on pages 36 and 37. I note that there is no actual mention of the fact that Shannon and in total 49% of the MASP area is located in Co. Clare. I would welcome a revised text which would acknowledge the significant and strategic location of the MASP in Co. Clare.

I refer to my earlier comments relating to Shannon, many of which should be repeated in Section 1.4 of the Draft Limerick Shannon MASP. I note with some concern that there are no Co. Clare Key Future Growth Enablers listed under Section 3 on pg 259. Given that the Co. Clare geographical area of the MASP consists of 49% of the total MASP area it is important that the South Clare SDZ would be recognised and supported as a significant opportunity comprising a mix of education, research and development, student accommodation, office space, permanent residential units, commercial space and enabling infrastructure.

The development of the Shannon Town Centre Action Area Plan should be recognised and referenced here as a growth enabler.

The fast-track delivery of the Limerick Northern Distributor Road should be listed as a growth enabler. Objective Limerick Shannon MASP 11 on pg 268 appears to be missing some text. I fully support and commend you for the wording and the vision the Regional Assembly has expressed in this objective and I am happy to discuss any insertion with you should you wish.

Optimal use should be made of the commuter rail network including the development and upgrading of the commuter rail stations and in particular the rail station at Ballycar and Sixmilebridge which is on the Limerick to Galway network.

Strategic Planning Areas

The Strategic Planning Areas and the SPA Committees which have been established are an important element of the structures of the Southern Regional Assembly. It is noted that while the Metropolitan Areas have been provided with a Chapter within the Draft RSES, the SPAs only have a brief reference within Appendix 2 and do not benefit from any Regional Policy Objectives. It is requested that the SPAs would play a much more prominent role within the RSES. Given the size and geographical spread of the Southern Region, running from Clare to Wexford, it is suggested that a Chapter dealing with each of the SPAs in greater detail, would present an opportunity for discussion on sub-regional issues, with appropriate Regional Planning Objectives.

Finally, I wish to complement the Southern Regional Assembly on the production of the Draft Regional Spatial & Economic Strategy for the Southern Region, which sets out a vision for our region which spans a very varied and diverse geographic area and demographic make-up. I also wish to acknowledge and thank you and your staff for the consultative approach adopted in drafting this document.

Clare County Council considers that building on the existing content of the Draft RSES, the above amendments will result in the first Regional Spatial and Economic Strategy acting as catalyst to implementing the NPF and achieving balanced regional development, creating sustainable communities and increasing the quality of life for all who live, work and visit County Clare and the Mid-West region.

Clare County Council would welcome the opportunity to work with you and assist further in the completion of the final RSES.

Yours Sincerely,



Chief Executive