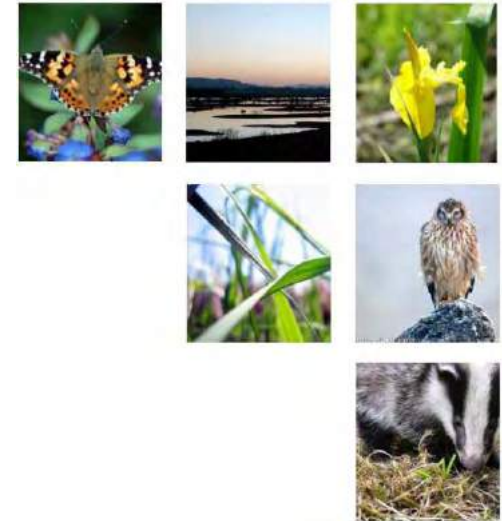




NATIONAL PLANNING FRAMEWORK SUBMISSION ON BEHALF OF SHANNON COMMERRICAL PROPERTIES

March 2017





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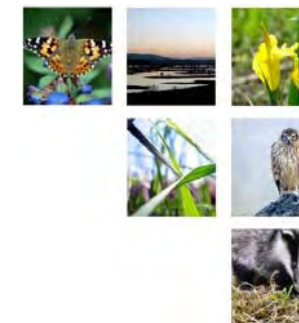


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1 INTRODUCTION

Fehily Timoney & Company has been retained by Shannon Commercial Properties (SCP) to make a submission on the new *National Planning Framework* and welcomes the opportunity to comment on same.

SCP currently owns approximately 400 buildings and approximately 2,000 acres of development land in approximately 70 different locations throughout the Shannon Region with the majority of this located within Co. Clare.

This submission informs of how SCP through the management and development of its portfolio can contribute to the economic and sustainable development of the Mid-West Region, providing balanced economic development and delivering investment and growth in the region.

SCP formerly Shannon Development, a regional development agency, was established in 1959 as a non-commercial semi-state body with the responsibility for the development of industry and tourism in the Shannon region. Over the years the remit of the Company has changed.

In May 2012, the Government announced the decision to restructure Shannon Development and place it alongside Shannon Airport (now owned by Shannon Airport Authority plc, which separated from the Dublin Airport Authority on 31st December 2012), to become part of a new semi-state company known as *Shannon Group plc* with a commercial mandate.

Shannon Commercial Properties (SCP) is a subsidiary of *Shannon Group plc*. and is the largest commercial property company in the mid-west region. SCP has a commercial mandate for the sustainable development and management of the extensive property portfolio. With the other business units; *Shannon Airport Authority*, *Shannon Heritage* and the *International Aviation Services Centre* (IASC) responsible for the airport, tourism visitor attractions, and aviation services, respectively.

This submission is made on behalf of *Shannon Commercial Properties* (SCP) and focuses on the commercial property portfolio specifically in the Shannon Free Zone, Shannon, Co. Clare which is currently going through a process of regeneration and renewal through the redevelopment of old building stock and identifying opportunities on greenfield lands within the Shannon Free Zone.

This submission identifies how Shannon Town can strengthen and provide for sustainable regional development and for this to be achieved there is a need for **significant investment** in the Region both from a **physical infrastructure** perspective and a **social infrastructure** perspective. There is a need to recognise the **unique synergy** created between Shannon Town and Limerick City and identify the need for **significant population growth** to establish a **critical mass** to attract central government investment and international investment.

1.1 Ireland 2040 and the Shannon Masterplan Plan

Shannon Commercial Properties are engaged in an ongoing collaborative process of research and consultation to strategically plan for the future of the Shannon Free Zone, and to engage with and understand its multifaceted relationship with its overall setting within Shannon Town and Limerick City.

In 2008 Shannon Commercial properties (then Shannon Development) commissioned the preparation of a comprehensive Masterplan for Shannon Free Zone. The aim of the Masterplan is to provide the basis for the regeneration of Shannon Free Zone and the adjoining Smithstown Business Park and for Shannon's further enhancement as one of Ireland's premier locations for modern internationally traded manufacturing and international services. This is a large-scale and detailed Masterplan which includes proposals and implementation strategies for new greenfield development, brownfield regeneration and major infrastructural expansion over the next two decades and beyond.

Section 1

The publication of the NPF which provides a strategic planning framework up to 2040 allows for Shannon Commercial Properties to demonstrate a strategic vision for the growth of Shannon, and its integral relationship to the rebalancing of economic and social development in Ireland.

This submission is being made to the NPF as a cohesive and evidence based approach to the future development of Shannon, the objectives of same aim to address the core principles of the NPF:

- to prevent further overdevelopment and sprawl;
- to achieve effective regional development;
- to address environmental challenges and climate change and;
- to encourage population growth closer to where employment is likely to be located.

2 EXECUTIVE SUMMARY

We submit that the NPF should provide a strategic urban structure for the Country that takes account of strategic economic, social and cultural functions;

The NPF needs to strategically identify urban centres for population growth, this is integral if services and facilities are to be sustained and improved into the future;

Over the last sixty years Shannon has established an integral role of national and international significance. It is home to the second largest agglomeration of US companies within the Country and has placed itself as an international hub within the Irish economy. This significant role requires the associated national support going forward.

Ireland needs a strong urban framework to drive regional economic development and to encourage a more balanced spatial structure to address the significant imbalance between the east and west of the Country. This involves carefully preparing for an urban future for the Country which requires a recognition of functional city regions which in the majority of cases extend beyond statutory administrative boundaries.

Shannon and Limerick have long had a symbiotic relationship due to their proximity, with each providing shared 'city functions' such as key international ports, education facilities and employment centres. The Shannon / Limerick node can function to its optimum potential if these functions are formally established through a spatial urban structure.

The NPF offers the government the opportunity to integrate polycentricism into the Plan by designate Shannon and Limerick as a key polycentric region within the overall urban structure for the Country.

In order to realise a more balanced regional structure Shannon requires prioritisation for the strategic infrastructural investment in key services such as transport, sewage, broadband and grid capacity. These are integral investments required if Shannon is to retain and protect its international competitiveness.

A critical mass of population is required, it should be a key function of the NPF to target significant population growth to the Limerick / Shannon node, to provide the critical mass to allow Shannon to grow in a sustainable manner.

3 HISTORICAL DEVELOPMENT OF SHANNON

3.1 Shannon as a Driver of Regional Development

Created in 1959 to lure foreign investors, the Shannon Free Zone proved revolutionary across the world, widely considered the site of the first modern “special economic zone” (SEZ), the SFZ attracted large multi-national companies to Shannon. Due to its success, the SFZ was extended to Smithstown SFZ (E) which largely accommodate Irish supply lead indigenous companies.

In the early 1960s, in response to the growth of the SFZ, Shannon Town, Ireland’s first new town in over 200 years was developed, to provide accommodation, services and facilities for the rapidly expanding workforce being attracted to SFZ.



Image 3-1: Shannon Airport 1950, Source: Shannon Town Development Plan 2012-2018

Shannon town developed with an initial house building programme to accommodate workers and executives adjacent to the new customs free zone, through a method of suburban planning known as the *Radburn system*.

This was rapidly followed in the early 1960s by the commissioning of an Outline Development Plan which proposed the overall scheme for the development of a “town” at Shannon. An interdepartmental committee appointed by the government concluded that a lower level of housing in Shannon should be provided. As a result, the initial *Downes and Meehan Plan* was revised in 1972, with a less rigid layout than that employed under the Radburn phase of development and which accommodated a smaller population. The principle of new housing in Shannon had been accepted and approval followed for SFADCo to purchase a land bank equivalent to the provision of 6,000 population. The population of the town is currently 9,673 (CSO 2016).



Image 3-2: Shannon Free Zone Context Map

Section 3

Shannon, is now the second largest town in County Clare. The settlement is defined by a number of component parts, namely the town itself, Shannon Airport, Shannon Free Zone and Smithstown Industrial Estates and agricultural lands to the east, west and north.

Its strategic importance is recognised in its designation in the National Spatial Strategy 2002-2020 as part of the Limerick / Shannon Gateway.

Shannon Town and Environs are of critical importance to the future economic development of the Mid-West Region. It occupies a strategic position along the Atlantic corridor and has excellent road connectivity to the Gateway cities of Limerick, Cork and Galway.

Shannon Free Zone (SFZ) is a 243 hectare (600 acres) industrial area with more than 7,000 people working in over 100 companies, including many premier multinational firms and generates exports in excess of €3.3 billion per annum. It has the largest concentration of North American companies in Ireland outside of Dublin. As a customs, free zone, a deferral system is in operation whereby duty payable on imports from non-EU countries is deferred until goods leave Shannon for another EU location. SFZ is also zero rated for Value Added Tax (VAT).

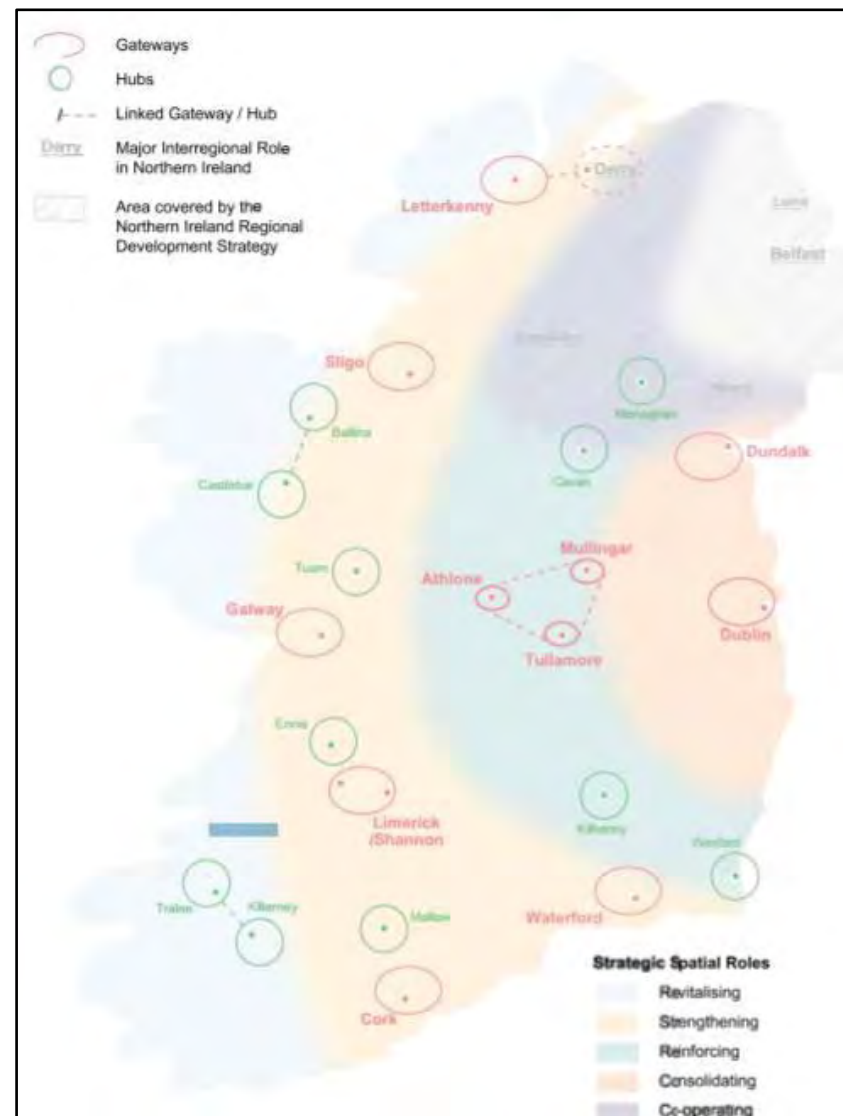


Image 3-3: Extract from Map 2, National Spatial Strategy 2002-2020

4 ADDRESSING SPATIAL CHALLENGES

4.1 National Spatial Challenges

Since the commencement of the NSS there has been an evident geographical pattern across the nation which is reflective of a significantly un-urban settlement pattern outside of the Greater Dublin Region that is unreflective of the urban influence intended to be delivered through the NSS. This monocentric pattern has prevented the development of a strong diversified urban hierarchy undermining balanced regional development as foreseen by the Government with the creation of organisations such as Shannon Development back in the 1950s.

Figure 4.1 of this report set out the context of those areas identified in the National Spatial Strategy 2002 as Gateways and Hubs within the context of Census data on population density. It is evident that there has been an increasing concentration of population in the East of the Country, with the majority of growth being accommodated in Dublin and the ten other counties extending from Cavan to Wexford.

This contrasts with similar levels of growth as foreseen through the NSS and the Regional Planning Guidelines not being realised within the southern and western parts of the Country.

We submit that Ireland needs a strong urban framework to drive regional economic development and to encourage a more balanced spatial structure to address the significant imbalance between the east and west of the Country. This involves carefully preparing for an urban future for the Country which requires a recognition of functional city regions which in the majority of cases extend beyond statutory administrative boundaries.

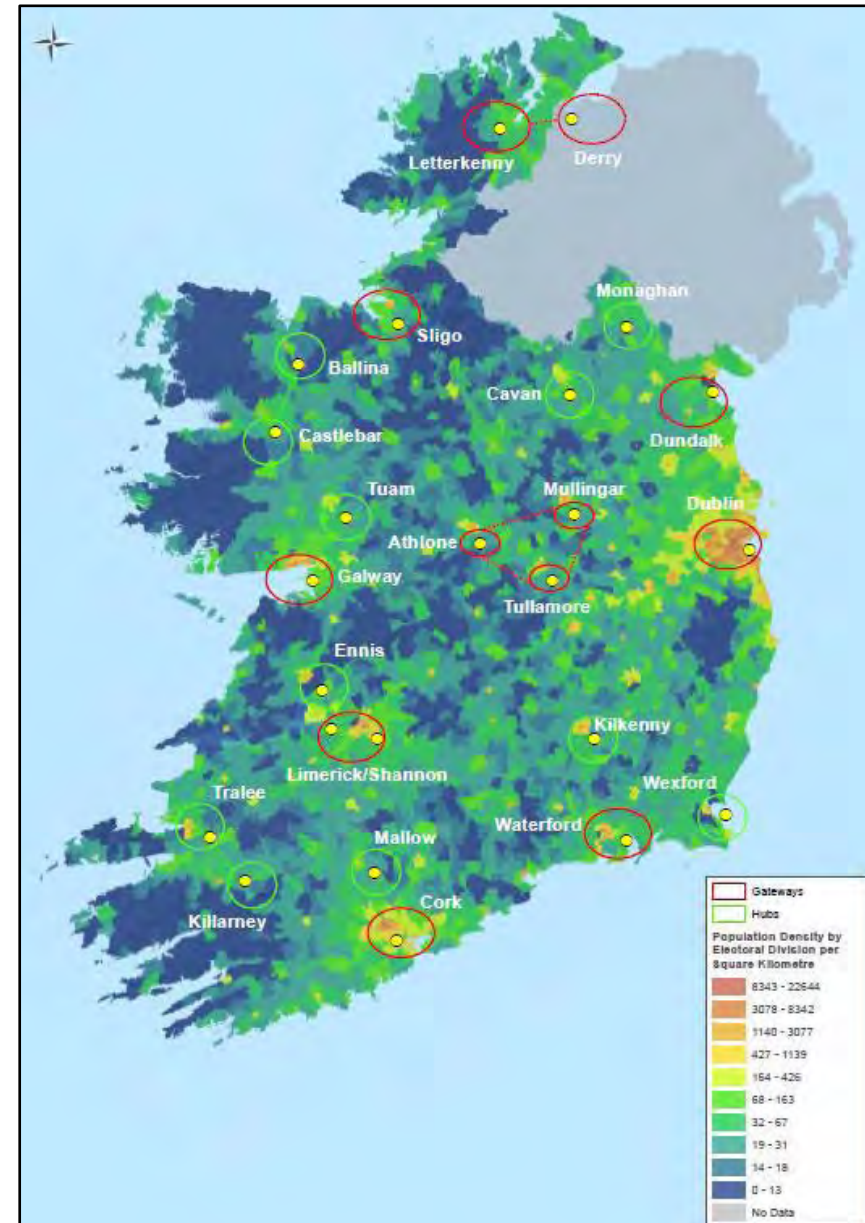


Figure 4-1: NSS Gateways and Hubs set within the Context of Population Density

Section 4

Limerick City for example has long has a symbiotic relationship with Shannon Town, based largely on the utilisation of Shannon Airport as an integral infrastructural asset to the City.

The principle strategy of the NSS was based on creating balanced regional development. The NSS identified 9no. National 'Gateways' as national and regional engines of growth. The NSS also identifies 9 strategically located medium sized "Hubs" that support and will be supported by the Gateways and will link out to wider rural areas. The aim of this strategy was to create counterweights of balance to the load being carried by Dublin in the East.

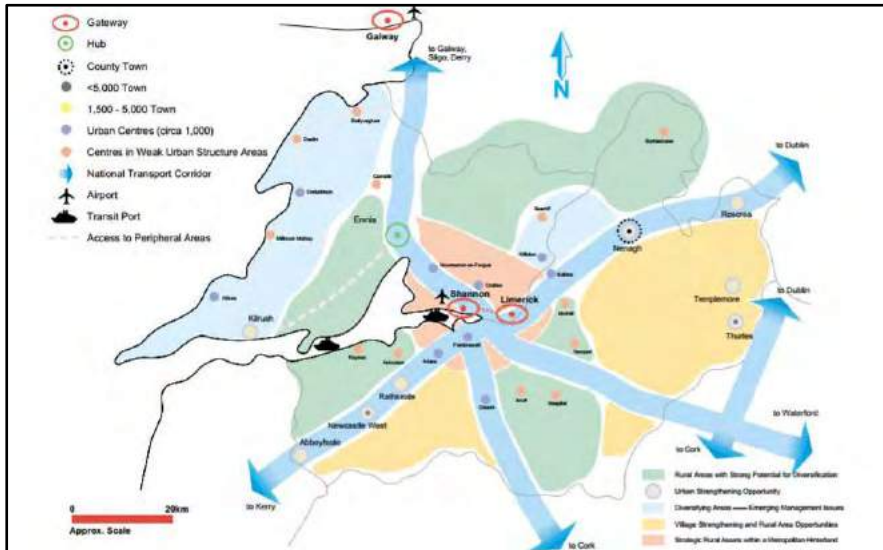


Figure 4-2: Extract from Map 7, National Spatial Strategy 2002-2020

Limerick/Shannon is classified as one of the national Gateways and the NSS recognised that the area needed to be strengthened to provide a platform for capitalising on its strategic location at the convergence of a number of road and rail networks and benefiting from the international connectivity of Shannon International Airport and the Shannon Estuary Ports.

Rather than create a regional balance, the last 15 years has seen the largest increases in population and economic activity in the East of the Country. Although Ireland on a whole has experienced a reordering of its settlement and demographic profile from one of rural to intrinsically urbanised in the last fifteen years this has been associated with urban expansion rather than a co-ordinated response to concentrating such developments within urban centres or within reasonable functional reach of urban centres. This is reflected in the Population Change data presented by the Department of Housing, Planning, Community and Local Government in their Issues and Choices Document (pg.8).

An urban vision is however presented in the Departments Issues and Choices Paper for the NPF (on pg. 11 *Location of Jobs, 2011*), which shows the regional distribution of jobs and a clear correlation between urbanisation and economic productivity.

While it is evident that central government were conscious of the integral regional development role of Shannon, it is also recognised that the strategic needs required to strengthen the Limerick/Shannon Gateway in terms of land use and transportation was not met in the last 15 years of the plan. During the NSS period none of Ireland's urban areas have matched the overall State population growth of 17.13%, during the first nine years of the intended eighteen-year life of the NSS, the aggregate population designated for Gateways and Hubs was just 11.27% as compared with 21.41% for the remaining population of the state despite the policy objective to achieve higher growth in these nominated settlements.

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4.2 Shannon/Limerick Gateway

At a local level Shannon is identified in the Clare County Development Plan 2017-2023 as a linked Gateway with Limerick, however it sits below Ennis within the overall Settlement Hierarchy. It should be noted however that no overall spatial strategy has been prepared to consider and plan for this strategic interrelationship of place. This is unfortunately reflective of the cross boundary administrative structures. This suggests the absence of strong incentives for local authorities to collaborate effectively in planning for social, economic and environmental coordination and coherent urban development between Shannon and Limerick.

Specifically, in the case of the Limerick/Shannon¹ Gateway the Gateways & Hubs Development Index 2012 (May 2013) prepared by the Southern and Eastern Regional Assembly in May 2013 provides an assessment on the socio-economic performance of the Gateway as designated under the NSS. The spatial context of this Gateway is set out in the report as shown in Figure 4.3 below.

This report recognised that:

"The Limerick-Shannon Gateway has continued to rise in the period 2006-2011. However, most of this growth has taken place within Zone 2, outside the urban core. The Mid-West Regional Planning Guidelines 2010-2022 set out a growth rate of the urban centres of the Limerick-Shannon Gateway of a growth figure of 1.15%. It is important to note that these figures are not directly comparable due to boundary differences, but it is possible to see that the urban cores are not performing to their potential in terms of population growth."

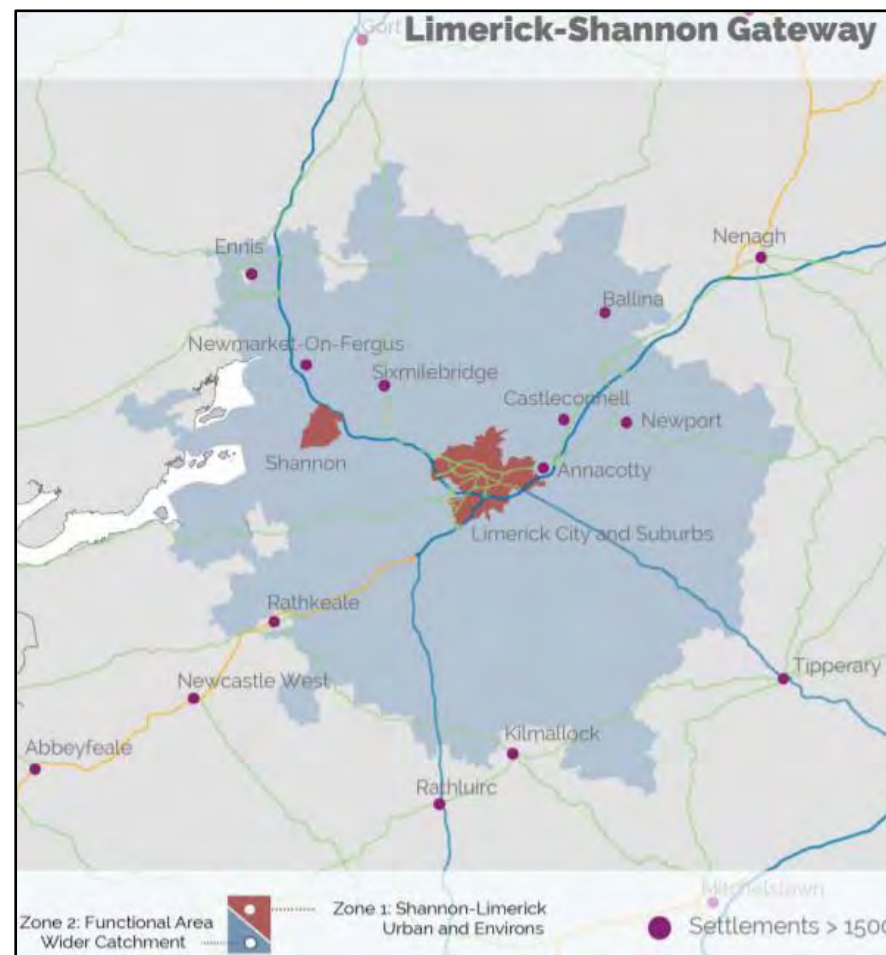


Figure 4-3: Extract from the Limerick/Shannon Gateway the Gateways & Hubs Development Index 2012, Limerick Shannon Gateway

¹Southern and Eastern Regional Assembly (May 2013) Gateways and Hubs Development Index: A Review of Socio-Economic Performance, Limerick/Shannon

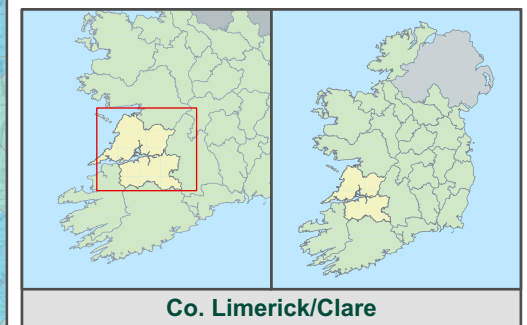
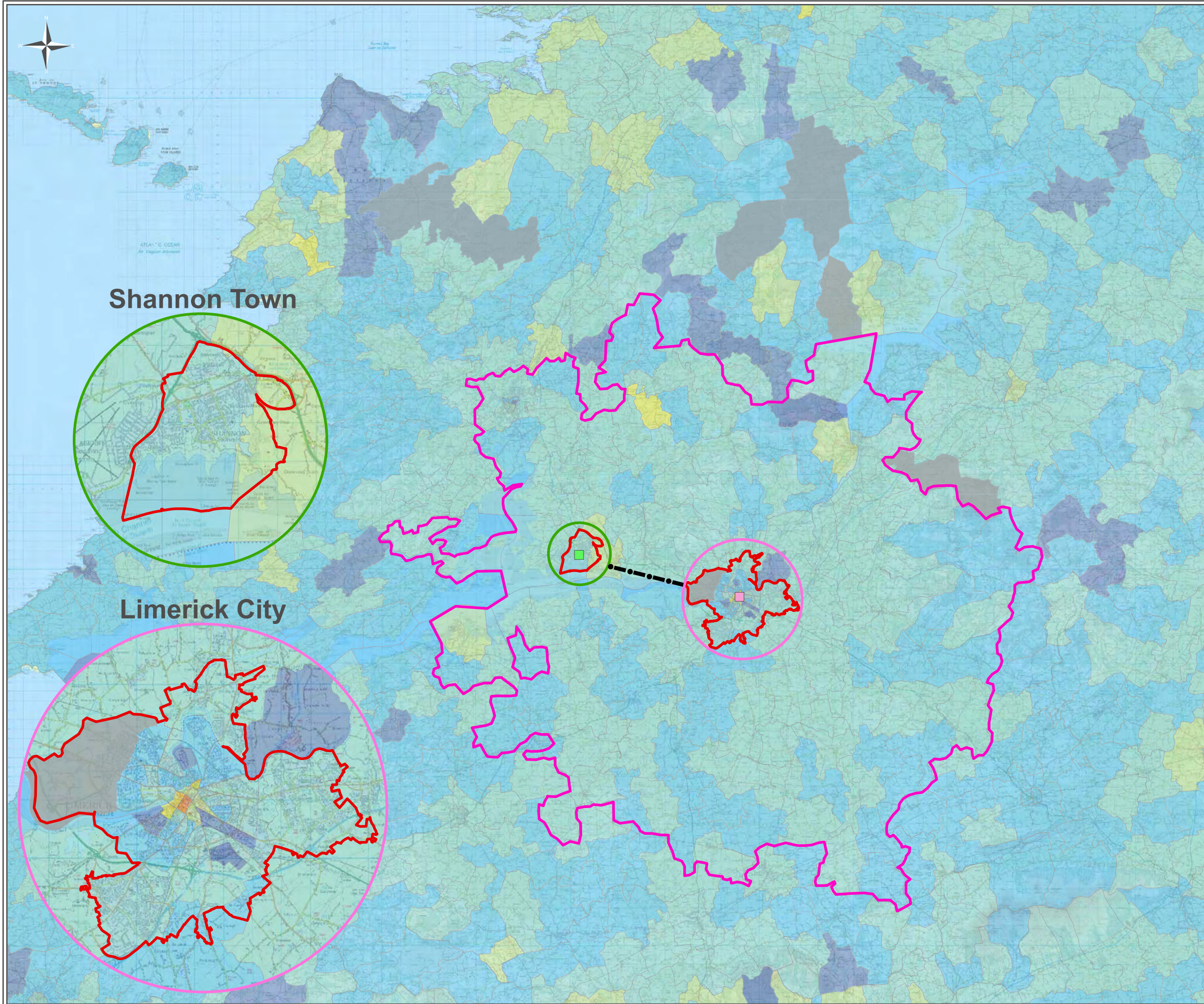
Gateway available at: http://www.southernassembly.ie/uploads/general-files/limerickshannon_report.pdf

Section 4

The report notes that the fastest growth rate in population has occurred within the hinterlands of the urban settlements of Limerick and Shannon, while the urban cores have experienced solely nominal growth rates. What is important to note from the above formal review of the NSS Gateways is that Zone 1 comprises of only the 'legal city' and the 'legal town' as the official record of population within the legally defined urban jurisdiction, whereas in reality the catchment of Shannon Town and Limerick city extends into a far greater hinterland.

In light of the publication of the preliminary Central Statistics Office data pursuant to the 2016 Census of Population, FT have assessed the pattern of population increase since the publication of the Limerick/Shannon Gateway the Gateways & Hubs Development Index 2012 i.e. between 2011 and 2016, the result of same are set out in Figure 3.3 overleaf. Within the same census period a similar trend continued within the Limerick Shannon Gateway whereby population growth has occurred where the immediate Town and City centres of Shannon and Limerick are characterised by a decrease in population. An increase can however be seen to the east of Shannon Town and to the South of Limerick City.

There is a significant planning and structural risk here that could result in a further decentralisation of services and a disconnect between people, employment and services. We submit that Shannon Free Zone was specifically designed for these purposes and is supported in local policy terms for same. Shannon Free Zone also has the potential to absorb this type of development and can similarly provide a multitude of supporting social, economic and cultural structures.



Legend

- Limerick City
- Shannon Town
- Zone 1 - Shannon-Limerick (Urban and Environs)
- Zone 2 - FunctionalArea (Wider Catchment)
- No Data Available

Percentage Population Change

- 50%+ increase
- 40-49% increase
- 30-39% increase
- 20-29% increase
- 10-19% increase
- 0-9 % increase
- 0-9% decrease
- 10-19% decrease
- 20%+ decrease

Figure Title

Percentage Population Change 2011-2016

Figure No.

4.4

Project

Shannon Commercial Properties NPF

Client

Shannon Commercial Properties

Scale

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4.3 Business as Usual

SCP are conscious that a continuation of current trends as set out above will lead to an overdevelopment of the East of the Country and a potential decline for this part of the Southern Region. Effective regional development is about reducing these disparities by embracing development specific to each of the regions.

More specifically if urban sprawl at a localised level is to continue within the hinterlands of both Shannon and Limerick, neither urban centre will have the potential to realise an appropriate critical mass, nor will there be potential to embrace development specific to this region. Long term this will have a devastating effect on the provision of infrastructure, services and identity within the Shannon area should their hinterlands continue to grow to form a conurbation.

4.4 Learning from our Experience

In the fifteen years since the NSS has been in place a better balance of social, economic and physical development has not been achieved. Specifically, in the case of Shannon, an appropriate critical mass has not been achieved.

The geography of overdevelopment associated with the property bubble of the Celtic Tiger saw development directed towards locations with little effective demand in a strikingly un-urban pattern as reflected in Figure 3.3. The result of this has been a serious underinvestment in the kind of strategic projects and key services and infrastructure including broadband provision, national grid connections and waste water treatment required for urban settlements such as Shannon due to shortfall in critical mass.

SCP submits that the key element of the Governments strategy should therefore be to bring people and employment closer together based on a targeted approach towards strengthening well established urban centres with key social or economic assets such as Shannon.

Shannon is spatially set out in a planned manner that comprises a strong existing residential cluster with relatively high densities for a generally suburban surface character together with a concentric ring of educational, retail, social, cultural and employment services. Employment and residential development were at the heart of the creation of Shannon Town, and today it comprises five main industrial areas within the environs of the town – Shannon Free Zone West, West Park, Free Zone East, Smithstown and lands related to Shannon airport. In addition, there is the Shannon Business Centre located within the town centre and Shannon House, which is located within, and enjoying the benefits of, the Shannon Free Zone. The Shannon Free Zone is home to the largest agglomeration of American companies in Ireland outside of Dublin. The Shannon Town and Environs Local Area Plan 2012-2018 seeks to ensure that Shannon continues to act as a driver of county and regional prosperity, harnessing its existing resources and strategic location.

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Figure 4-5: Infographic of some Global Companies Based at Shannon Free Zone²

Over the last sixty years Shannon has established an integral role of national and international significance. Shannon has established itself as an international hub within the Irish economy, and requires the associated national support going forward. This will result in a more balanced form of development and will relieve pressure from the eastern part of the Country.

SCP submits that the NPF should recognise the future economic development and employment generating capacity of Shannon Free Zone and adjacent industrial parks as well as Shannon International Airport, this needs to be done in a multi-faceted way that is particularly conscious of the requirement to provide for residential development in a manner that is respectful of the sense of place in Shannon, so as to create a critical mass to both retain the existing economic structures of Shannon as well as allowing it to grow into the future.

² Source: Shannon Chamber of Commerce, Shannon Free Zone, available at: <http://www.shannonchamber.ie/about/about-shannon/shannon-for-business/shannon-free-zone/>

5 A PLACEMAKING STRATEGY – SHANNON WITHIN THE LIMERICK CITY REGION

5.1 Polycentric Approach to Urban Planning for Shannon's Future

The NPF Issues and Choices Paper issued by Minister Coveney notes that Ireland has experienced a more spatially un-even pattern of regional and urban development than other similar OECD countries and we depend more on our largest city than other competitor countries. There is a recognition from government that we need to significantly refocus and strengthen our 'next tier' cities and also that at a tier below the cities there are a number of towns which, due to their level of service provision and extensive catchments serve an important role within the spatial framework of the country.

Shannon is one of these towns that offers a broad base of services and facilities, but which also has a greater catchment which reaches into Limerick City and its hinterland. Limerick City for example has long has a symbiotic relationship with Shannon, based largely on the utilisation of Shannon Airport as an integral infrastructural asset to the City. This pattern is reflective of the City's proximity to the Clare border and, its ability to reach into its immediate hinterland to seek to assume a critical mass.

The idea of polycentricity was one of the key concepts coined by the European Spatial Development Perspective in 1999, and subsequently followed up by the Territorial Agenda in 2007. This linked concept of polycentric development was broadly proposed under the NSS, however clear structures and parameters of the role of each place, as well as the contextuality of place were not clearly defined and thus the true spirit of polycentrism was never fully realised or utilised.

Central to the preparation of a place-making strategy is first understanding the specificities of place, while Shannon remains often bound by its administrative title of 'Town' or 'Shannon Town' in geographical terms it is more broadly defined as an urban agglomeration. In this submission, we seek to contextualise the specificities of Shannon and identify its current relationship, and potential future relationship with Limerick City as set out in Section 5.2 hereunder.

5.2 The Principle of Polycentric Development within the Limerick City Region

Based on the above outlined Recent Development Patterns, it is evident that a monocentric model is no longer suitable in the context of evolving spatial patterns within the West of the Country. SCP submits that in order to re-balance regional distribution or people and employment polycentrism as a spatial concept needs to make its way into the NPF. Polycentrism is defined as the existence of multiple centres in one area. The concept of a polycentric 'City Region' allows for different places to provide a specific bundle of 'city functions' for the whole region. The relationship between Shannon and Limerick has long functioned organically in this way, however a lack of formalised spatial structures has led to sprawl within their respective hinterlands.

SCP has long been conscious of the need to define the specific role of Shannon, in particular the role of Shannon Free Zone within both a National, Regional and Local Context. In 2008 a Masterplan for Future Development of Shannon Free Zone was commissioned to '*attract investment through sustainability*'. This masterplan was premised on creating a business and technology at Shannon Free zone that is compatible with the 21st Century, the Plan was also conscious of creating an attractive space that is welcoming to the wider community through the provision of public spaces, facilities and amenities.

Shannon Free Zone is broadly identified as Shannon Free Zone West and Shannon Free Zone East the context of same is set out in Figure 5.1 below.

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Figure 5-1: Site Context Map of Shannon Free Zone West and East

The proposed uses identified for the Shannon Free Zone area through the Masterplan process include Business & Technology (ED1/ED3), Advanced Manufacturing and Logistics (ED2) and Light Industry (ED4), as identified in Figure 5.2. The proposed zonings have been largely adopted by the Shannon Town Development Plan 2012-2018 which provides for a planned expansion of Shannon Free Zone into the future.

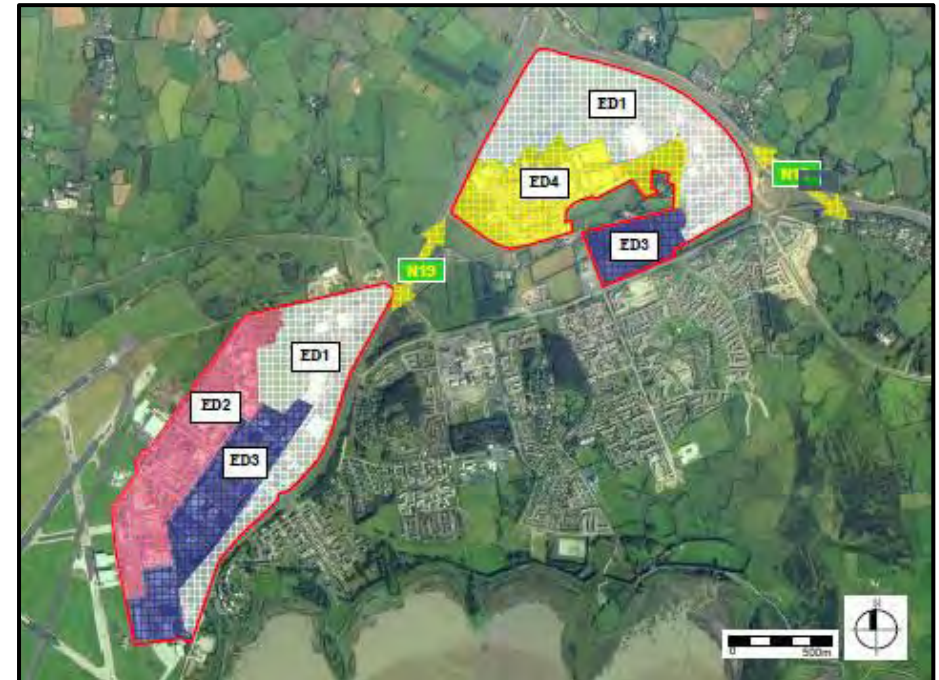


Figure 5-2: Indicative Future Uses Planned for Shannon Free Zone

The merits of polycentrism are based on places within the region providing a variety of 'city functions', but with each place providing a degree of symbiosis rather than direct competition. It is integral that we consider places within their overall national context rather than within their specific administrative boundaries alone and it is in this way we can begin to consider the strategic national distribution of 'city functions'.

Shannon Free Zone has developed as a trade, aviation and logistical centre which currently employs over 6,500 people across a range of companies including Zimmer, UCB, Digital River, GE Capital, Genworth Financial, Intel, Lufthansa Technik, Mentor Graphics, RSA Security and Symatec.

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It is evident that this is reflective of a geographical pattern or urban agglomeration or business clustering. Agglomerations and business clusters require principle rethinking of their role and place and significance on a national scale. This submission explores this role and significance through the economic and social themes of aviation, tourism and industry and the preparation of a national vision for the 'competitiveness of regions'.

The vision and relationship for the Limerick / Shannon Gateway is illustrated in Figure 5.3 below.

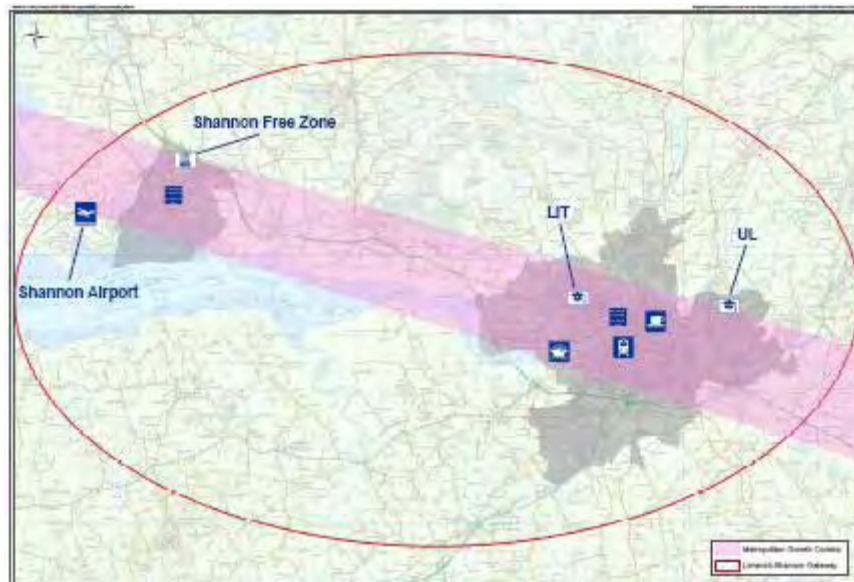


Figure 5-3: Shannon / Limerick Node.

5.2.1 The Aviation Industry

Ireland has global recognition in its aviation industry and aerospace business. Shannon enjoys a unique place in aviation history where in 1939 saw the first transatlantic scheduled air route touched down, Shannon was also home for the pioneers of aircraft leasing and the birthplace of the modern air finance industry. The development of Shannon Airport has historically been linked to its location as a refuelling point for trans-Atlantic traffic and its status as the world's first duty-free airport. The availability of land in and around the airport, and its role in supporting local and national development bodies in attracting aero-industrial and other business to the region, including FDI, means that Shannon Airport continues to operate as an airport that relies on a mix of passengers, business jet, cargo and other commercial operations such as aircraft maintenance.



Image 5-1: Shannon Airport 1959, Extract from The Guardian³

³ The Guardian (April 2016) Story of cities #25: Shannon – a tiny Irish town inspires China's economic boom, available at:

<https://www.theguardian.com/cities/2016/apr/19/story-of-cities-25-shannon-ireland-china-economic-boom#img-1>

Section 5

Although economic trends have shifted and changed since the 1930s, the aviation industry remains embedded in both the economic structure of Shannon as well as within less tangible assets such as identity. Aviation has been no exception to the unbalanced regional patterns evident across the County, which is primarily Dublin-centred. Within the Irish economy, Dublin serves as a major population and business centre and it is these urban structures generates high levels of demand to the east of the Country. In the case of Shannon Airport, it supports a dispersed passenger and cargo catchment that extends from the northern part of Cork through to Limerick and Clare to Galway and across to North Tipperary⁴. A 2011 report prepared for the Department of Transport on the future operation of Cork and Shannon Airports found that the main urban centres supporting Shannon Airport include Limerick City, Ennis and Galway City, and that most industry in the catchment area surrounding Shannon Airport is centred around the urban centre of Limerick, Shannon Free Zone and the Limerick/Ennis suburban rail network.

This report prepared by Booz & Co. (2011:5) for the Department of Transport highlighted that:

*Shannon Airport is widely viewed as having the opportunity to transform itself to a major cargo hub in Europe, particularly should the Irish government successfully negotiate pre-clearance with the US. The airport covers an area of 2,000 acres of which 25% is development land, and the airport is adjoined by the Shannon Free Zone, a business and technology park for around 600 acres that is owned and managed by Shannon Development*⁴⁵.

The support for the development of a Cargo Hub is reflected in both the Mid-West Regional Planning Guidelines 2010-2020 and the Shannon Town Development Plan 2012-2018.

⁴ Booz & Co. (2011) Options for the Future Ownership and Operation of Cork and Shannon Airport available at: <http://cdn.thejournal.ie/media/2012/02/Booz-report.pdf>

The Booz & Co. 2011 Report highlighted that in the case of Shannon Airport unfortunately the viability of the business cannot be justified through passenger growth alone and that new sources of revenue should be explored including the:

- Exploitation of land banks;
- Exploration of cargo business potential; and
- Improved leverage an expansion of US pre-clearance facilities to include cargo.

SCP submits that the future of the aviation industry at Shannon is dependent on a government commitment to the unlocking of lands at Shannon Free Zone, and for the designation of Shannon Free Zone as an integral part of the overall urban structure of Shannon and through appropriate population growth to provide for critical mass.

5.2.2 Tourism

Limerick City has marketed itself and placed itself within a national context as a centre for Arts, Culture, Creativity and Tourism. Tourism as an economic driver is of huge importance in Limerick City and Shannon Airport acts as one of the primary arteries which feeds this economy, and is of critical importance to the future economic development of same. Similarly, foreign direct investment in dynamic sectors such as Information, Communications and Technology require a modern airport with access to both mainland Europe as well as transatlantic locations.

Tourism is a key part of the Irish economy and is a key contributor to GNP and employment. Inbound and outbound tourism flows are also a key driver in aviation passenger demand. In 2015, out-of-state tourist expenditure amounted to €4.6 billion.

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With a further €1.3 billion spent by overseas visitors on fares to Irish carriers, foreign exchange earnings were €6 billion⁶. In 2015, just over 1.7 million passengers passed through Shannon Airport, an increase on 2014 and terminal traffic i.e. passengers who began or ended their journey at Shannon, increase by 6% on 2014 to over 1.6 million⁷. Aviation is recognised as vital to the future business of the region in terms of tourism, trade and connectivity.



Image 5-2: Shannon Airport Embracing new forms of branding including the Wild Atlantic Way Fáilte Ireland programme for Tourism⁸.

⁶ Fáilte Ireland (September 2015), Tourism Facts 2015, available at: http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3_Research_Insights/3_General_SurveysReports/Failte-Ireland-s-tourism-facts-2015.pdf?ext=.pdf

⁷ Shannon Airport, Traffic Figures available at: <http://www.shannonairport.ie/gns/about-us/traffic-figures.aspx> accessed 21.03.2017

In 2015, Wild Atlantic Way Operational Programme 2015-2019, which sets out a strategy for the sustainable implementation of the Wild Atlantic way over this period was launched by Fáilte Ireland. Official figures from the Central Statistics Office (CSO) show the best January to July period (2016) for foreign tourists, with more than 5.4 million arrivals, representing an increase of almost 13% – 612,400 additional overseas visitors when compared with the first seven months of 2015.

Shannon Airport is a key gateway to the Wild Atlantic Way which stretches along Ireland's West coast from Donegal in the North to Cork in the South and Shannon Airport is at its very heart.

Aviation however also has a much broader tourism base for Shannon than the provision of a terminal alone. Tourism industries directly related to the Aviation industry have also grown from the history or Aviation within the Town, these include the Irish Aviation Museum and the Atlantic Air Venture which is an aviation education and flight simulation centres facilitating individual visitors, birthday parties, corporate events and providing flight simulator training, field trips and aviation displays.

5.2.3 Planning for complementary Industries

Because of the strategic location of Shannon Free Zone on the Atlantic sea board, its geography and economy is one of both proximity and globalism, both of which require recognition within the NPF.

At a proximate level Shannon interacts with Limerick City in an organic but strategic manner. Cultural, tourism and creative industries have increasingly integrated into the policy agenda for cities, and Limerick is no exception.

⁸ Irish independent (June 9th 2015) Wild Atlantic Air: Aer Lingus launches branded plane on Boston route available at: <http://www.independent.ie/life/travel/travel-news/wild-atlantic-air-aer-lingus-launches-branded-plane-on-boston-route-31288901.html>

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However, it should be noted that as cities begin to branch into a more 'creative economy', services associated with a 'harder economy' such as industry and manufacturing slowly become pushed from the centre of the City outwards to make space for these new land-uses.

Geographically and spatially this results in a separation of the working population from key employment. Harder industries preform a key 'city function' which also has an important role to play within the overall economy and should be accommodated strategically.

Service sectors generally seek more locations where employees can benefit from wider amenities, for example food, leisure, and cultural offer. These types of services can only be delivered within city centres. In contrast, there is also a significant need for manufacturing and industrial uses within the wider city economy, these can located beyond these prime locations, but often tend to require a business cluster location which can give rise to greater efficiency, competition and productivity.



Image 5-3: Clayton Hotel, Limerick City. Tallest hotel in Ireland

Shannon Free Zone was developed for this specific purpose and offers a strategic location for the relocation and growth of industrial services, with a strategic existing population and infrastructure base. The 2008 Masterplan for Future Development of Shannon Free Zone demonstrated its capacity to accommodate these industries which has been integrated successfully into the Shannon Town Development Plan 2012-2018.

SCP is conscious of the need to integrate industrial and advanced manufacturing units into the economy of the Limerick City Region.

Companies such as Zimmer who provide medical devices manufacturing from Shannon Free Zone to the worldwide market are one of these such uses. Advanced Technology Manufacturing Units (ATMUs) however require large land banks, and as industry and manufacturing beings to become squeezed from Limerick City Centre, sufficient land backs can no longer be accommodated within the centre. The planning and sustainability risk here is that structures of a significant scale (up to 2,700m²) may sought to be developed at the edge of Limerick City continuing this monocentric sprawl into the hinterland, requiring large scale parking provision and long distance car based travelling. SCP has a significant land bank available to adopt this type of development, and importantly located adjacent to an existing population which can strategically reduce the requirement for long distance car based travel.

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Image 5-4: Zimmer Building, Shannon Free Zone

At a more globalised level given the strategic location of Shannon on the trans-Atlantic sea board it has allowed for a planned and strategic development of the second largest agglomeration of American companies (after Dublin) it is evident that this global relationship has an integral role to play in the overall economy of the Limerick City Region.

We submit that the urban vision for the Country which will be set out in the NPF must ensure that through the diversification of our urban economy that existing industries are protected and that the existing success and future potential of Shannon Free Zone is measurably recognised within the NPF. A commitment to strategically locate industry within Shannon Free Zone as a National policy, will ensure that into the future the population for the Limerick/Shannon area can be realised in a balanced way.

6 ENABLING THE VISION – REQUIREMENT FOR INVESTMENT

6.1 Implementation

The key to the future success of Shannon will be implementation of a Plan at an appropriate and meaningful scale. There will also be a need

The requirement for investment comprises two levels the first being a policy investment in the strategic importance of Shannon and the second being a strategic investment in the provision of services to support same. While our submission has set out the strategic 'city functions' that Shannon provides in conjunction with the City of Limerick both on a national and international level, the commitment to maintaining this economic base for the Southern Region can only be achieved through planned and meaningful investment in services.

We note that macroeconomic decisions regarding the availability of expenditure for capital investment is beyond the scope of the NPF, it is understood that it will present a clear picture of the planning principles that will influence future priorities. In order to enable the successful plan-led development of Limerick/Shannon there is a requirement for a number of key investments, these include an integrated transport system between Limerick and Shannon, investment in broadband, electricity grid capacity and sewage management.

6.1.1 [Investment in Population](#)

There will be a focus on creating sufficient critical mass in key settlements across the country in order to sustain and improve services and facilities. Outside of the main cities, larger towns such as Shannon which provide key services and facilities will ensure a

balanced spatial pattern of growth in which critical mass can be reached and potential realised. Enabling a critical mass of population in established towns and villages will ensure that appropriate investment can be made to support the demand for associated services.

The new Regional Planning Guidelines which will be prepared in response to the 2016 Census data to be released in April 2017, it will need to set clear objectives and targets to guide the development plans of the planning authorities that are specific in relation to future population, settlement strategy and development distribution, and infrastructure investment priorities.

The Limerick-Shannon polycentric region is of particular importance in this context. Past trends have indicated that there has been a significant failure to achieve the critical mass required within the city and town core of both places. Within a clear future population target, which is also strategically target the urban structure will incur the same challenges as previously encountered over the last fifteen years. This will have stark impacts on the providing of infrastructure, transport, services and facilities, as well as access to a working population to drive the local economy.

6.1.2 [Investment in Transport](#)

Successful economies have the physical and digital infrastructure to facilitate trade and business and move goods, services and people quickly, efficiently and in environmentally sustainable ways. Shannon offers inter-city links to Limerick and Shannon, as well as global connections to international markets through Shannon Airport. Set within a polycentric region Shannon also has access to Limerick Port. In combination the airport and the port provide significant competitive advantage and their respective national importance should be reflected within national policy.

At a National level, we have noted high commuting flows on radial routes into the nation's cities, characteristic of a monocentric urban system.

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Within this proposed polycentric system urban commuting will be between one larger centre (Limerick) and one smaller specialised sub-centre (Shannon). Without a defined national commitment to the future development of Shannon Free Zone as an employment hub within the Southern Region, there is potential for dispersal between both urban centres. There has been a long-standing commitment at a National and Local level towards the provision of a rail corridor between Shannon and Limerick, unfortunately due to the economic downturn this has not materialised.

There exists a clear need for an integrated transport system to underpin the spatial, social and economic growth of the Shannon/Limerick area. This can be built upon through the efficiencies of consolidated population growth.

There are currently defined corridors of transport demand between Shannon and Limerick, with both centres having the potential to accommodate significant population and employment growth. SCP recognises the importance of delivering modal shares and transport options to and from Shannon Free Zone.

We submit that the development of a sustainable transport corridor between Limerick and Shannon Airport, Shannon Free Zone and Shannon Town will combat the urban sprawl that has been experienced at a significant pace across this part of the Country for the last twenty years.

6.2 Investment in Broadband

High quality infrastructure is an important element of a modern society and economy. Modern ICT and broadband communications infrastructures are integral to the carrying out of business within a modern economy. The provision of high-quality affordable broadband services is a critical issue for this part of the Southern Region, and the need for the provision of same cannot be over emphasised.

Shannon Broadband Ltd. has been established by Shannon Development with the Local Authorities in Clare, Limerick, North Tipperary and Offaly to provide a basic broadband network for the Region. Initially, this infrastructure has been installed in Limerick City and a number of other urban centres with subsequent connections regionally and to the international networks based in Dublin. The presence of the broadband facility provides the basic ducts and cable system that commercial telecommunications operators can access, thereby helping to attract such operators to the Region. However, despite these developments there are significant parts of the Region where reasonably priced access to high-quality broadband is not possible which acts as a significant barrier to urban growth.

Investment in the broadband network within the Shannon area is integral to both support the existing industrial base of Shannon Free Zone and to encourage future economic investment in the Town.

6.2.1 Investment in Sewer Capacity

In Shannon the treatment of wastewater is operated by the single public wastewater treatment plant and Tradaree Point, which caters for both domestic and industrial wastewater. The Shannon Town Development Plan 2012-2018 states that (Section 12.2.5);

"there is sufficient capacity in principle to accommodate additional development proposals over the plan period. However, the plant is not currently capable of complying with the requirements of the EPA discharge licence. Currently, the proposals for an upgraded Shannon Sewerage Scheme are at planning stage and are included as part of the WSIP 2010-2012."

In theory therefore, Shannon could not have realised the expansion foreseen by the NSS, and it is evident that strategic investment and appropriation of services is required to realise even moderate growth within Shannon from a residential and economic viewpoint.

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While it is noted that some investment has been made in the region including a €3 million investment by Irish Water in March 2016 working in partnership with Clare County Council was announced which involved improvement works at the wastewater treatment plant in Shannon and also on a sewerage network project which involves cleaning and surveying the sewers and an analysis of the wider wastewater network in the area. We also note that over the last two-year Irish Water has carried out a number of other improvement projects in the area, including the construction of a new 2km pipeline in Shannon Town which replaced a collapsed rising main and the upgrade of a number of pumping stations in Shannon Town in late 2014, which has ensured the network is operating more effectively and efficiently.

These works however seem to reflect a 'catching-up' approach to development rather than a strategic investment in the future. It is integral that the government strategic plans for the provision of efficient services and facilities in cities and towns if an urban vision is to be realised for the country to combat regional disparities.

6.2.2 *Investment in Grid Capacity*

Electricity has perhaps become one of the most 'taken-for-granted' infrastructures within the urban environment, in that people and businesses assume immediate availability and efficiencies in the electricity grid. The Mid-West Regional Planning Guidelines (Section 6.6) notes that there is a need to augment the network serving Ennis and Shannon from Ardnacrusha and there is a need to make provision for the connection of renewable energy resources from suitable areas of the Region.

It should be noted that SCP is committed to the integration of renewable energies into the design and operation of future development at Shannon Free Zone. A Green Print methodology was employed in the preparation of the 2008 Shannon Free Zone Masterplan is a new sustainability assessment process developed by BRE Ireland which takes full account of local planning policy and sustainability guidance, as well as other issues relevant to the

Shannon Free Zone site. A series of overarching sustainability objectives and benchmarks were established to steer the Masterplan process.

In order to achieve these objectives however, there needs to be a national commitment to measurably investing in grid and electricity infrastructure. Without such facilities, a significant barrier will be created to achieving the urban vision which is aspired for through the NPF. Shannon requires a national prioritisation for strategic infrastructural investment in order to protect international competitiveness.

7 CONCLUSION

We welcome the opportunity to contribute to the preparation of the National Planning Framework. This Plan is a valuable opportunity for central government and the Department of Housing, Planning, Community and Local Government to realise and plan for, in an appropriate manner, sustainable regional development. This can be achieved by adopting clear policies and a detailed spatial strategy that is based on a strategic urban framework. Since the 1930s Shannon has had a central role in realising regional development, and has as a result placed itself globally as a hub for American foreign direct investment, Shannon has also developed a close and mutually beneficial relationship with Limerick City. We submit that the urban structure that has developed between these two places needs to be supported through the formal adoption of a polycentric vision for the Limerick City Region. The Spatial Strategies set out by the NPF must recognise these strategic relationships and look beyond administrative boundaries to achieve the most effective and sustainable approach to urban planning.