



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

Stiúrthóireacht Forbartha Eacnamaíochta,
Comhairle Cathrach & Contae Luimnigh,
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Planning Department,
Clare County Council,
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Via email: devplan@clarecoco.ie

11th March 2022

Re: Submission on the Draft Clare County Development Plan 2023 - 2029

A Chara,

Limerick City and County Council welcomes the issuing of a Draft Clare Development Plan 2023 – 2029 and the opportunity to make a submission.

This submission relates to the Limerick – Shannon Metropolitan Area population figures and the proposed South Clare/ University of Limerick Economic Strategic Development Zone (SDZ) and concerns in relation the potential impact on Limerick City Centre. Having reviewed and discussed the draft plan with colleagues I wish to make the following observations.

1. Limerick – Shannon Metropolitan Area population figures

The Draft Clare County Development Plan sets out the projected population growth to 2026 and 2031 for the Limerick-Shannon Metropolitan Area under Chapter 3 Core Strategy, Table 3.3. The figures appear to contain a typographical error with respect to those utilised in the adopted Regional Spatial and Economic Strategy for the Southern Region (see table below from adopted RSES). The Council respectfully request an update to the figures to ensure consistency within the RSES.

Table 1 | Population Projections for the Limerick-Shannon Metropolitan Area²⁷

Area	Population 2016	Projected Population 2026	Projected Population 2031
Limerick City and Suburbs (in Limerick)	89,671	112,089	123,289
Limerick City and Suburbs (in Clare)	4,521	5,607	6,150
Subtotal	94,192	117,696	129,448
Remainder Metropolitan Area (Limerick)	15,281	19,453	21,611
Remainder Metropolitan Area (Clare)	22,947	25,414	26,463
Subtotal	38,228	44,867	48,074
Total Limerick-Shannon Metropolitan Area	132,420	162,563	177,522

2. Proposed South Clare/ University of Limerick Economic Strategic Development Zone (SDZ)

Limerick City and County Council acknowledges that the University of Limerick (UL) is a key strategic asset in the Mid-West Region and recognise the opportunity for the expansion of university related economic activity at this location, which cannot be accommodated in the City Centre.

However, the Council has concerns that development of the scale proposed, including a population of 3,500 plus and 3,500 plus jobs could lead to the creation of a new town, which could adversely impact on the recovery and undermine the development of the City Centre. In this regard, development of the SDZ at the scale proposed is considered premature, pending the sequential development of the City Centre first. Therefore, we consider any proposals for non-university related development to be unnecessary in the life of this Development Plan.

A key emphasis of the NPF, RSES and the Draft Limerick Development Plan is the delivery of compact growth, sustainable transport and climate mitigation. The NPF aims to secure long term transformational and rejuvenation focused compact city growth, while Limerick 2030 envisages the City Centre to be at the heart of the economic force of the region – an attractive magnet for retail, leisure, residential, commercial, educational and cultural growth. To maximize success in the region and attract international workers and investment the role of the City Centre is essential. The UL strategy itself is inextricably linked with the positive development and regeneration of Limerick City with plans to develop a City Campus at the brownfield former Dunnes Stores site.

On the basis of the above, the priority for Limerick City and County Council is the sequential approach to development in the first instance, with the primacy of the City Centre prioritised in the Mid-West Region. This sequential approach to growth is a requirement of the “*Key future planning and development and place-making policy priorities*” for the region in the NPF (pg. 47). Therefore, any proposal for an SDZ should take place in a phased and integrated manner following compact growth, consolidation and revitalisation of the City Centre in accordance with the basic principles of the NPF. In this regard, the NPF clearly references

“rejuvenation focused City development, with a special emphasis on capitalising on the potential of underutilised and publicly owned and centrally located sites and their potential to boost the population and economic output levels of City Centre areas as drivers for wider regions”. This will be achieved through increased development of both residential and employment uses on many of the vacant and brownfield City Centre sites, in partnership with key stakeholders such as the LDA, Limerick 2030 DAC, UL, Shannon Foynes Port Company and private sector investment.

Development of the scale proposed for the SDZ in the absence of integration of land use and transport planning, in particular the absence of the Northern Distributor Road from the National Development Plan, would result in increased patterns of private vehicle based commuting and congestion. This would exacerbate existing issues in Limerick City and Castletroy, where there is already significant pressure on road based infrastructure. The potential accessibility and connectivity of the SDZ with the City Centre is unclear. Furthermore, there are no additional school services or other amenities proposed to cater for this population increase, which will have adverse impacts on the facilities in the Castletroy area of Limerick City and Environs.

To conclude, Limerick City and County Council supports appropriate and sustainable growth of UL and will actively collaborate with all key stakeholders to facilitate same. However, proposals for the SDZ must be in a phased and integrated manner, which supports the primacy and development of the City Centre in the first instance and associated objectives for compact growth, consolidation, revitalisation, sustainable transport and climate mitigation.

Limerick City and County Council respectfully request that the comments set out in this submission are considered prior to the adoption of the Plan.

Yours Sincerely,



Vincent Murray,
A/Director of Economic Development & Enterprise

