



**Shannon
Chamber**
Advancing business together



CLARE COUNTY DEVELOPMENT PLAN 2022 -2028

Shannon Chamber Submission to Public Consultation

Issues Paper

November 2020

Preface

Shannon Chamber welcomes this opportunity to partake in the 'Pre-Draft: Phase 1 – Presentation of an Issues Paper' stage of the development of the Clare County Development Plan.

In preparing this submission, we were cognizant of the contributions we have made to a number of other 'calls for submissions' that should also be taken into account when preparing this Plan, namely: the Shannon Town Masterplan, the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), the Regional Spatial and Economic Strategy (RSES) Southern Region, the National Planning Framework and, the Atlantic Economic Corridor.

Our response will therefore be presented from a macro perspective, under a set of headings and themes which match the requirements of the Issues paper, as opposed to responding to each individual suggested question presented as response prompts. Our submission will build on the extensive range of previous work and inputs to other Council and Government initiatives as mentioned above.

Our aspiration, and Clare County Council's, is that the output of the public consultation process – Stages 1- 3 - will lead to the compilation of a Plan that will be implementable within a specific timeframe to enable Co Clare:

'maximise its unique characteristics, strengths, location and connectivity to become Ireland's centre of culture, tourism, heritage and the preferred international destination for sustainable investment and innovation. A county in which citizens, visitors and all stakeholders are empowered and supported by public bodies under the leadership of a professional, responsive and progressive local government system'. (Vision for Co Clare in Clare County Development Plan 2017 – 2023).

Shannon Chamber Response to Stage 1 of the Public Consultation Process– Issues Paper

1. Introduction

Acknowledging the many challenges that Clare County Council faces in drafting this Plan, namely...

- Developing a unique identity and building on the strengths of County Clare
- Growing the Limerick-Shannon Metropolitan Area Town of Shannon, the Key Town of Ennis and other settlements throughout the County to achieve compact growth
- Reducing our carbon footprint and achieving the national target of zero emissions by 2050
- Improving mobility and accessibility for all, within and through the County in a sustainable manner
- Promoting town and village centre vibrancy and vitality with multi-functional uses including entertaining, living, gathering, shopping etc.
- Delivering a balance between social and private housing
- Living in the future and how it will be different
- Living sustainably without compromising future generations
- Accommodating the needs of an ageing population
- Providing sufficient physical and social infrastructure to support economic development and to enhance our quality of life
- Building on the provision of high-quality employment and economic opportunities at appropriate and sustainable locations

... we strongly believe that, to maximise how Co Clare benefits from and contributes to national economic and social goals, it is essential that the Plan is placed in the relevant strategic context.

In this regard, the fact that the Issues Paper recognises and documents key elements of the strategic context in which the Plan is being devised, namely, the National Planning Framework (NPF) and RSES and that Shannon Chamber has participated in and made submissions to each of the above, it is essential that this content is also considered during the deliberative process for the County Development Plan. *(Our submissions to the RSES, Southern Region, is presented as a separate pdf with this Submission).*

As Clare County Council is aware, Shannon Chamber is also currently actively engaged with the Council and stakeholders on the drafting of the Shannon Town Masterplan and the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and these outputs should also inform and be taken into account when drafting the County Development plan *(Summary of key points raised in our submission to LSMATS is included in Section 7 and full submission also presented as a separate pdf with this Submission).*

Shannon Chamber has been actively involved with other chambers in the West of Ireland, together with public and private stakeholders, in the development of the Atlantic Economic Corridor (AEC). The AEC has been recognised in the NPF, RSEs (Northern and Southern regions), a Government-led AEC Task Force has been established with AEC officers appointed in each local authority across the corridor and, funding has been provided to the Western Development Commission for AEC initiatives

Shannon serves as an engine of economic growth for the AEC through Shannon Airport, Shannon Free Zone and the Shannon Estuary and its position in the Limerick Shannon – Ennis – Galway portion of the corridor creates opportunities to accelerate delivery of the next iteration of the County Development Plan

The recognition of, references to, and resources available to the AEC in the wider policy and planning context should be leveraged to maximise the impact and influence of the County Development plan

2. Impact of External Shocks

The development of the County Development Plan must take account of the negative economic impacts that the COVID-19 pandemic has had on a range of activities and sectors that are central to the economic and social well-being of the county, regions and country. This includes a catastrophic collapse in air travel at a global level, which has brought Shannon International Airport to a standstill and led to the cancellation of long-standing and viable air services. The unprecedented drop in demand for aircraft and air travel has had a knock-on effect on a range of aviation industries such as leasing, maintenance, repair and overhaul as well as tourism, ground transportation, retail and travel services.

The new Plan must take account of this current reality but most importantly, must provide a signpost and measures to accelerate recovery, namely:

- Position Shannon International Airport as the preferred international point of access to the AEC and the Wild Atlantic Way (WAW)
- Provide a planning framework that prioritises and supports multi-modal transportation of visitors between Shannon Airport and WAW attractions rather than from Dublin
- Strike a better balance between quantity and quality in visitor numbers and revenue to the county
- Build on the opportunity presented by a change in consumer and public health preferences from congested urban areas to accessible and less populated areas offering high-quality, authentic experiences grounded in a sense of place
- This opportunity can be reinforced by a County Development Plan that supports, for example:
 - An increase in private jet traffic at Shannon International Airport
 - The design and construction of combined working/living spaces in a range of locations

- Integrated multi-modal transport solutions that facilitate ease of movement between hubs of activity across the county, metro area and the AEC
- High-speed broadband connectivity which is accessible to all regardless of location or socio-economic circumstances
- Social and cultural facilities that create a better living environment and thereby increase the ability to attract skilled and creative people to live in the county

3. Utilise and Build on Opportunities to Exploit Existing Assets

The impact of the pandemic provides an opportunity and a necessity to make best-possible use of existing and underutilised assets:

- The AEC, including County Clare, has abundant natural resources that can contribute to the development of a low-carbon, high-value economy including renewable energy, agri-technology, culture and heritage (*see January 2019 submission to incoming Government 2020-2040 AEC Business Forum Manifesto Final.pdf...included with this Submission*).
- The potential for use of existing green infrastructure in Shannon for cycleways, walkways and amenity use has been highlighted during the Shannon Town Masterplan and LSMATS processes.
- The opportunity to maximise the impact of existing assets and public expenditure by piggy backing on flood relief works to add to the existing network of pedestrian and cycle friendly pathways along the river embankments.
- Shannon is based on three key components: Shannon, the Airport; Shannon, the Industrial Zone; and Shannon, the Living Town. This is a strength, but the weakness is that Shannon, the Living Town, lags behind the other two in terms of focus and investment.
- A key strength is that there is potential, without the need for major infrastructural investment, to build a Shannon brand based on integration of Shannon - the Airport, Industrial and Living Town. It is possible to live, learn and work in Shannon in a sustainable way (walk to work and school, avail of the abundant green spaces and facilities, ...) but yet be part of internationally trading and globally competitive businesses and have the ability to connect to other parts of the world through the airport.

4. Housing

- The County Development Plan must promote investment in a mix of housing types in order to enhance Shannon, the Living Town, which, in turn, will increase the potential to attract and retain the skilled workers and visitors which are essential to the future prosperity of Shannon Airport and Shannon Free Zone.

- There is an opportunity for refurbishment of Shannon’s private sector stock of housing to create opportunities for new families to purchase aspirational properties in a compact and smart urban environment.
- The requirement for additional housing in Shannon will be linked to its attractiveness as a place to live.
- Given that Shannon now has a multi-generational population, consideration should be given to providing housing to meet the specific needs of the elderly and independent-assisted living e.g. retirement village concept.
- In order to fast track solutions for individual residents and developers to the absence of serviced sites for residential development, the Council, or other State entity, must invest in the delivery of infrastructure ahead of demand by providing parcels of serviced sites for housing (roads and key services in place and sites ready for purchase).

5. Civic, Community and Creative Facilities

- Shannon is currently seen mainly as Shannon - the Airport, and Shannon – the Industrial Zone.
- Shannon the living town is a critical third component which must be integrated with the other two from a planning and policy perspective
- For the community there is a missing component: a civic, community and creative focal point to complement the strong community-led investment in sporting and leisure facilities.
- Build on Shannon’s position on the estuary and its place as both a drop-off point on (and point of international access to) the Shannon Estuary Way (a loop off the Wild Atlantic Way) and promote existing strengths of the airport lagoon and estuary mud flats and shoreline for bird watching and nature activities as highlighted by Birdwatch Ireland.
- Reinforce and reveal Shannon’s hidden gems of heritage by supporting and promoting initiatives already underway by groups such as Shannon Archaeological Society and Duchas na Sionna (original Shannon settlements before development of the new town, Hasting’s Cottage, Shannon Wetlands, ...)

6. Shannon as a Strategic Development Zone

- Shannon’s significance in economic terms is recognised by the NPF through its inclusion in the Limerick Shannon Metropolitan Area. This recognition should be built on by thinking of Shannon as a special economic zone that brings together an area bounded on the south by the River Shannon, to the north by the airport runway and, to the east by a line from Bunratty to the N18/N19 junction. The Plan could be even more ambitious by extending the eastern boundary to run through Sixmilebridge to Newmarket on Fergus. The northern boundary could also be extended along the back roads to Ballygirreen and Dromoland.

- Adaptable land use zoning is key to generating enterprise growth in Shannon.
- Regardless of the boundary, the main point is to think of Shannon as a living, working, multi-modal transportation zone with significant capacity for testing of all kinds of sustainable ideas. Pilot-testing new approaches that can then be applied elsewhere is part of Shannon’s DNA across multiple dimensions: aviation, industry, living, education, ...
- A good current example of this approach is Future Mobility Campus Ireland, led by the private sector with substantive and practical backing from key public stakeholders such as Shannon Group plc, Enterprise Ireland, Western Development Commission, Clare County Council. Consideration should be given to developing other such innovative and education centres in which Shannon has a proven specialism e.g. aviation and med tech.
- Prepare for the future by considering and laying the groundwork in policy and planning terms for the potential of a fourth river crossing which would connect the Limerick and Clare sides of the Shannon Estuary at Shannon International Airport thereby increasing its catchment area, reducing journey times and reinforcing its place at the heart of the AEC and in the Limerick Shannon Metropolitan Area.

7. Transport and Infrastructure

Summary of key points from Shannon Chamber’s Submission to LSMATS, which apply equally to the compilation of the Clare County Development Plan. Full Submission pdf included with Submission.

Walking

- Improve walkways in and around Shannon to allow for better accessibility between services in the town centre, the key employment hub of the Shannon Free Zone and Shannon Airport.
- The abundant green areas in Shannon, which include a long-established network of "black paths" developed as the town was built, offer real potential for attractive and green walkways and cycleways.
- Extend the walkway/cycle way from Limerick to Bunratty to Shannon using existing riverside infrastructure – using existing green and landscaped areas, not roads.
- Refocus walkways in Shannon on the existing black path network that already exists and is extensively linked to the town.
- Upgrade the existing Shannon walkways signage to include direction indicators – develop a wayfinding system for Shannon.
- An outcome from the LSMATS should include a recommendation that a walkable neighbourhood map be created for Shannon.
- Ensure that the pedestrian environment is significantly enhanced, more attractive and safer than at present, particularly around key visitor attractions such as King John’s Castle.
- Enhance wayfinding in both Shannon and Limerick City Centre with a focus, in Limerick particularly, on ensuring ease of access to key tourist sites.

Cycling

- Designate a coherent network of cycle routes and cycle hubs across Shannon which will provide access to Shannon Airport, Shannon Free Zone and Shannon Town.
- Expand the Bicycle Sharing Scheme to Shannon.
- Development of cycling and walkway from Shannon to Bunratty /Sixmilebridge and following the riverbank to Limerick
- Shannon offers significant potential for cycling and walking using the existing network of off-road and riverside pathways and rural roads.
- Consider pilot testing walk and cycle-to-school initiatives in Shannon using quiet ways based on existing pathways.
- Create long-stay parking and cycle parking hubs in Shannon, Shannon Free Zone and Shannon Airport.
- Introduce a dockless bike system for Shannon.
- Extend the cycle lane in Shannon to take in the riverside in Shannon and on to the airport; achievable through piggybacking on the upcoming flood relief works.

BusConnects

- Implement more direct inter-regional bus services between Shannon Airport and the second- tier cities of Galway and Cork.
- Assess how private operators can be licenced to operate on routes noted in our commentary on P3/4 (Section 3... comments related to P19) of this submission.
- Connect with Shannon to Limerick City Centre and other key locations such as UL and LIT via a fast frequent and reliable bus service.
- Develop Park and Ride in both directions – Shannon to Limerick and vice versa and to facilitate access to e.g. inter-city buses also.

Rail

- Shannon Chamber would recommend that the concept of light rail linking Limerick, Shannon, Sixmilebridge and Galway warrants further examination as the trend for this type of connectivity could become more beneficial in the future... given the requirement to reduce our carbon footprint; light rail might be a faster and direct method of transport and a driver of rail spur development.
 - *Our recommendation to Clare County Council, in the context of the County Development Plan, would be that land use distribution be examined vis a vis attaining the critical mass required to render rail connectivity feasible.*

- As a short-term proposal, a shuttle bus linking e.g. Sixmilebridge to Shannon might warrant consideration given that circa 40% of this 'village's' population (6,000 – 7,000) commute to Shannon on a daily basis between schools and work.
- Review rail freight taking into account work on the Western Railway. The development of renewable energy (wind) along the Atlantic Economic Corridor will require interlinked and sustainable port and transport facilities.

Roads & Streets

- Upgrade the N19 approach road to Shannon Airport from the current single carriageway road layout.
- Address capacity constraints on the N19 at junctions connecting to the Business Park and Town.
- Develop a new signalised junction on the R471 at Smithstown and a new link road to connect the junction with the existing road at Smithstown.
- Upgrade the junction of L3126 and Low Road (and its approaches) at Bunratty.
- Review Shannon Town Centre parking including rationale for blocking a previous access point at the Lidl roundabout and its negative impact on traffic behaviour.
- Advance the M20 project linking Limerick and Cork and the Limerick Northern Distributor Road.
- Consideration should also be given to a future upgrade of the Limerick to Kerry route to facilitate easier access to Limerick, Shannon Airport, Galway, and the west of Ireland.

Traffic Management

- Develop an integrated coach management scheme to support traffic management measures at key locations.

Supporting Measures

- Support the development of the Connected Autonomous Vehicle (CAV)/Mobility as a Service (MaaS) sector in the Shannon area including Unmanned Ariel Vehicle (UAV) R&D.
- Consider the likelihood of future unexpected occurrences which could further alter the pattern of living and working.
- Consider the benefits of a 4th River Shannon crossing for long-term delivery. Potential to deliver a significant city of scale and enhance the served market for Shannon Airport. enhance Shannon Foynes Port, and create the potential for an orbital route around the airport and the greater Limerick Shannon Metropolitan Area.

Housing – Impact on Transport

- The regeneration of cities and towns will see an increase in the number of families and individuals opting for city-centre living. Consider the impact of remote working on city-centre office accommodation and the potential to regenerate such buildings to living spaces. Regeneration needs people and people needs better cycling, walking and a fast and easily accessible mode of transport.
- Rural areas will also benefit from remote and hub working but will also require access to urban areas such as Shannon and Limerick city. This trend needs to be factored into the delivery of an all-encompassing Transport Strategy.

8. Tourism

- References made in our submissions to both the RSES Southern region and the LSMATS, called for an upgrade of the road infrastructure at both Shannon Airport (N19) and Bunratty Folk Park (L3126), the former a point of entry for tourists to the western seaboard and the latter, a key tourism magnet for the region, delivering visitors to the many smaller tourism attractions dotted around the county.
- The upgrading of this road infrastructure will also benefit Shannon Town. If the many recommendations made in our submission to the LSMATS with regard to upgrading cycleways and pathways along the Shannon Estuary and connecting Shannon with Bunratty are taken on board, the potential this would present to develop a tourism product for Shannon Town would be enormous. A package of tourism products could be developed for Shannon Town, incorporating products such as Shannon Aviation Museum, Shannon Wetlands, Shannon Walkways and potentially a Shannon Greenway.
- As recommended in our submission to the LSMATS, Shannon Chamber believes that a 'walkable neighbourhood' map, similar to that produced by Limerick City and County Council, as presented in the draft LSMATS, would be most beneficial for Shannon and could be easily produced by Clare County Council, using the existing river and green area walkways. This would link with the Shannon Estuary Way, of which Shannon is part, which is a loop of the Wild Atlantic Way and includes both Clare and Limerick. There are multiple options to map out 2 to 5-minute walk segments from Airport, Zone, Town and amenity areas of Shannon. The routes already exist. This is not an infrastructural but a branding and communications issue and something Shannon Chamber would be keen to see being delivered as a recommendation from the LSMATS.

Conclusion

As outlined at the outset, our approach in framing this Submission was to review it from a macro perspective. Our commentary therefore focuses on areas that, we believe, warrant consideration and inclusion in the Plan to ensure that its compilation can position Co Clare to meet the challenges facing the county and Ireland in the years ahead.

We appreciate being given the opportunity to present this Submission and look forward to Stage 2 of the process – Public Consultation on the Draft Plan – which we will review and make a submission accordingly.

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16 November 2020



**Atlantic
Economic Corridor**
Advancing regions together



Atlantic Economic Corridor Discussion Paper

AEC High Value Low Carbon Economy

Pilot Test

Proposal to Incoming Government

22 January 2020

Draft

Strategic Context – Key Forces are Shaping Economic Activity for People and Places

Global Competitiveness creates Urban Metropolitan Hubs (Level 1) where only those in highly paid high value jobs can afford to live.

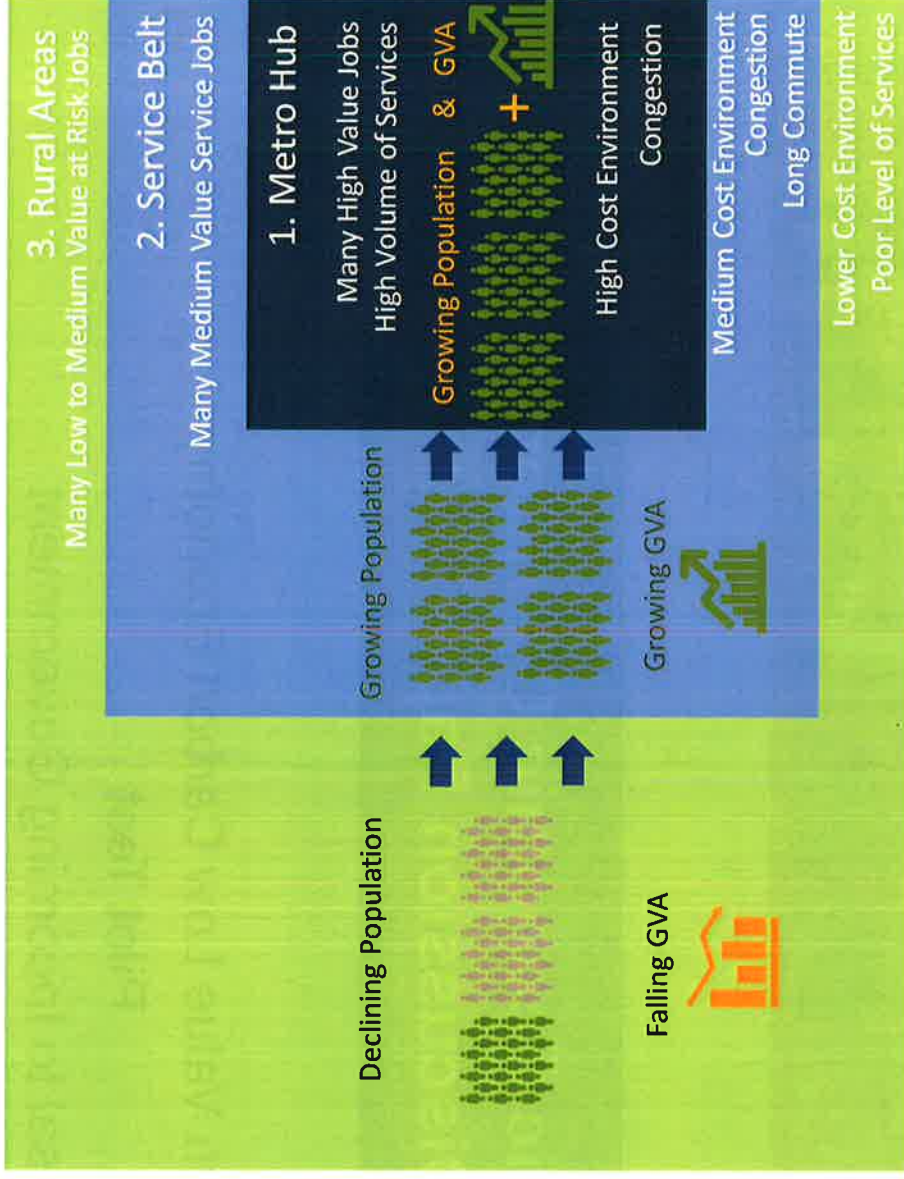
Employees and service providers to those in Level 1 must live in the growing Service Belt (Level 2) where the price of affordability is a long commute.

The pull of economic activity in Levels 1 & 2 drives increasing de-population and low investment in regional and rural areas (Level 3)

This trend is fuelling:

- **Economic inequality**
- **High Carbon activity and**
- **works against Climate Action**

Do we accept this as the inevitable price of a globally competitive economy? Or do we work to deliver the mitigating actions that will provide a win-win solution for Levels 1, 2 and 3?

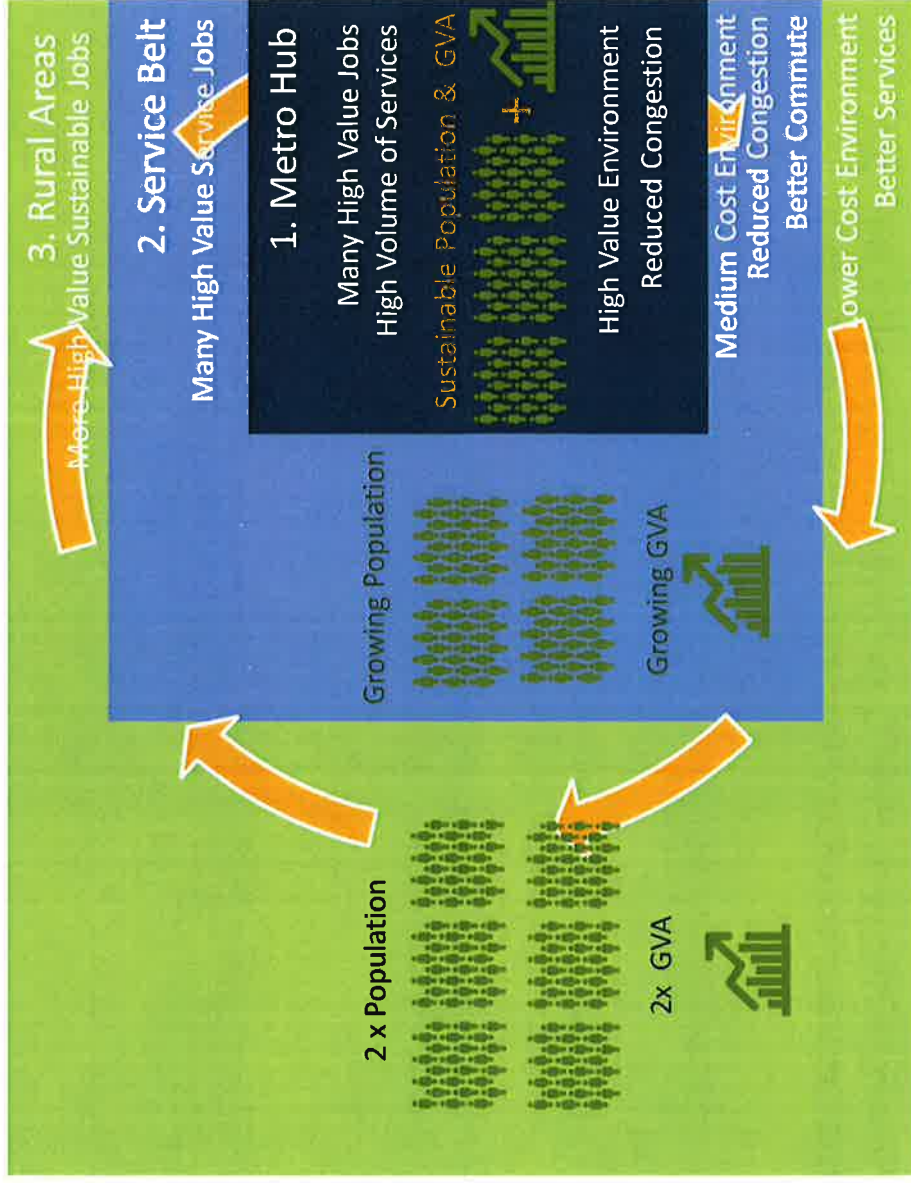


Atlantic Economic Corridor (AEC) can be the Pilot Zone for a High Value Low Carbon Economy

The AEC has elements of Levels 1 and 2 but is dominated by Level 3 where rural depopulation undermines realisation of potential and delivery of, investment, infrastructure and services.

The AEC's natural resource base provides the opportunity to pilot test delivery of coordinated, coherent and collaborative actions towards a high value low carbon economy:

- Population growth through implementation of positive and active interventions.
- Investment in enabling infrastructure.
- Source 100% renewable energy from the ocean
- Migrate land usage to carbon neutral levels
- Double the value of marine related industries.
- Double the value of Tourism in the region.



AEC can Generate Carbon Neutral Energy to Fuel Low Carbon High Value Sectors A Closed Loop High Value Low Carbon Pilot Test for a Sustainable Ireland

Lower wind energy production costs and increased battery storage provide the opportunity to realise the AEC's potential:



Off Shore Wind



On Shore Wind

The AEC also has potential in both transition and other renewable energy sources:



Gas



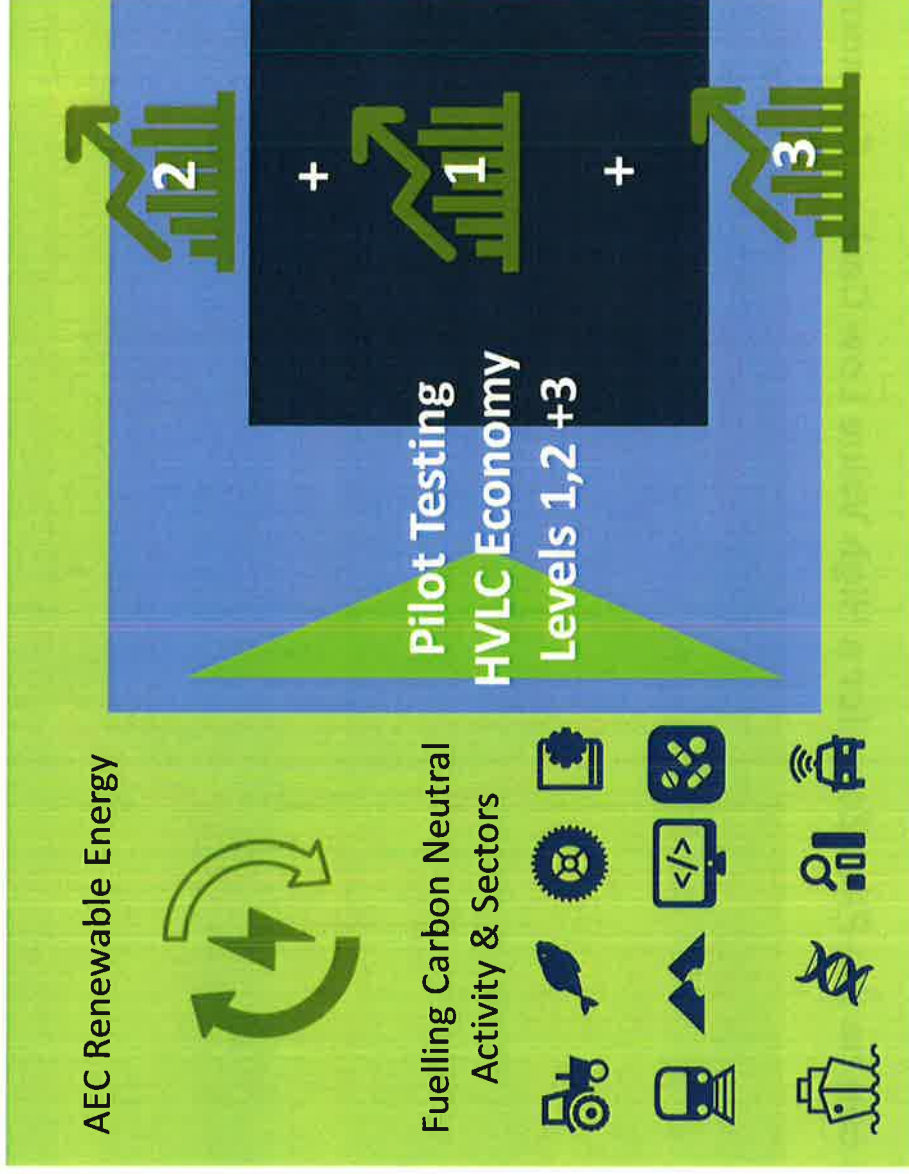
PV Solar



Wave



Bio Energy



What Must our New Government Do to Realise the AEC Opportunity?

1. AEC established as Economic Zone
2. Ten-T Status or real equivalent for AEC Zone
3. Capital Funds in place for Delivery



1. Overarching Economic Ministry Established
2. With Responsibility + Authority
3. With Control of Assets + Delivery Agents



1. Action Plan for AEC High Value Low Carbon Economy Agreed
2. KPIs agreed
3. Regular monitoring, review & re-focusing of goals

Specific & Clear Commitment
In Programme for Government



Dedicated Overarching Ministry
With Assets & Resources



Clear Action Plan, Responsibilities,
Timelines & Deliverables

POTENTIAL ADDITIONAL OR BACK UP SLIDES

The AEC HVLC Economy Pilot Offers the Potential to Show Progress on Most of the UN Sustainable Development Goals to which Ireland has Committed



TRANSFORMING OUR
WORLD:
THE 2030 AGENDA FOR
SUSTAINABLE
DEVELOPMENT

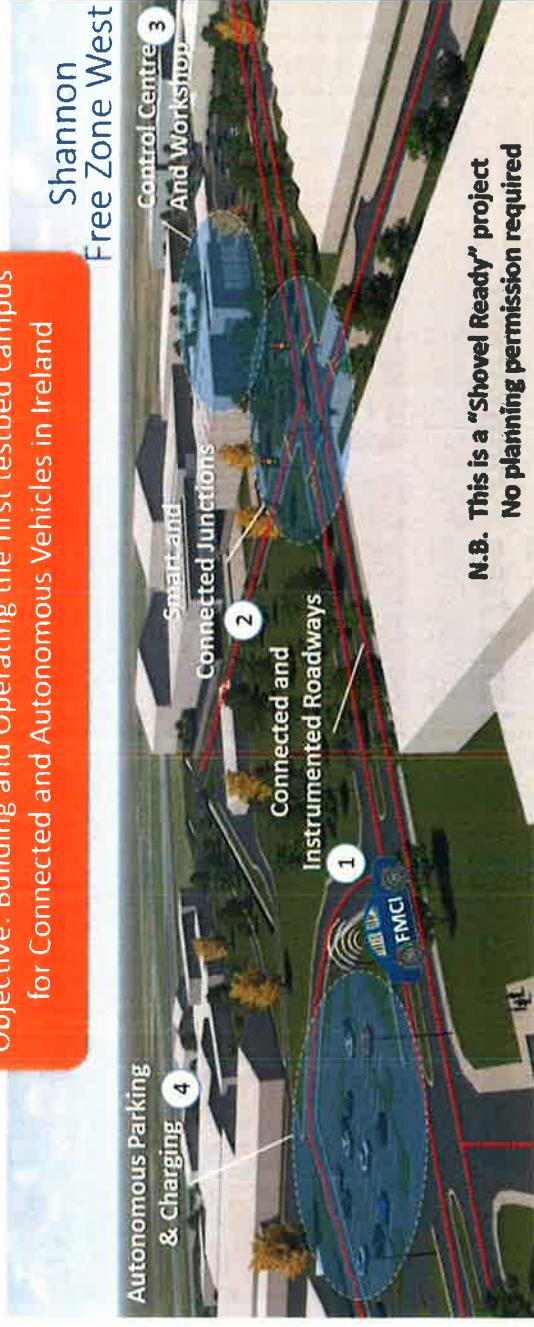
<p>1 NO POVERTY</p>	<p>2 ZERO HUNGER</p>	<p>3 GOOD HEALTH AND WELL-BEING</p>	<p>4 QUALITY EDUCATION</p>	<p>5 GENDER EQUALITY</p>
<p>6 CLEAN WATER AND SANITATION</p>	<p>7 AFFORDABLE AND CLEAN ENERGY</p>	<p>8 DECENT WORK AND ECONOMIC GROWTH</p>	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>	<p>10 REDUCED INEQUALITIES</p>
<p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p>	<p>13 CLIMATE ACTION</p>	<p>14 LIFE BELOW WATER</p>	<p>15 LIFE ON LAND</p>	<p>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</p>
<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p>	<p>17 PARTNERSHIPS FOR THE GOALS</p>			

One Example of Existing Joined up Thinking & Action on HVLC Economy from Private & Public Organisations in the AEC Realising Potential of Existing Assets



FMCI: National Asset in the Mid-West

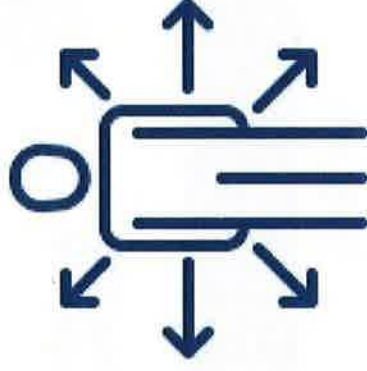
Objective: Building and Operating the first testbed campus for Connected and Autonomous Vehicles in Ireland



AEC Vision

An Updated Version to Capture the Essence of what we are Trying to Do

*Realise the potential that is present in the region
by being the best location in the world for
people to create their own future.*



These are the Big Things we will Focus on in order to Realise the AEC

Vision

Strategic Focus

Vision

Outcome



A Business and Community Partnership to lead the investment and development of the Atlantic regions



Create unique investment propositions, of scale, with comparative advantage, to attract international investment



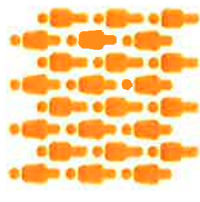
Be known internationally for Innovation, Collaboration and a “Collective Can Do” attitude



Create viable and sustainable, social and economic communities

Become the best location in the world for people to create their own future

Double Population



Realise Potential



GDP 3.5 x Current Level

END





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**LIMERICK /SHANNON
METROPOLITAN AREA TRANSPORT STRATEGY
2040 (LSMATS)**

Shannon Chamber Submission

October 2020

PREFACE

The Limerick-Shannon Metropolitan Area Transport Strategy will be instrumental in the regeneration and transformation of Limerick City and the wider Limerick-Shannon Metropolitan Area.

Regional Spatial and Economic Strategy for the Southern Region

The Strategy will deliver a high-quality, accessible, integrated and more sustainable transport network that supports the role of the Limerick-Shannon Metropolitan Area as the major growth engine of the Mid-West Region, an internationally competitive European city region and main international entry to the **Atlantic Corridor**. [Shannon Chamber would recommend using the term *Atlantic Economic Corridor* in this and all such references to the Corridor]

Draft Limerick / Shannon Metropolitan Area Transport Strategy

Shannon Chamber welcomes the opportunity to make a submission to the Draft Limerick / Shannon Metropolitan Area Transport Strategy (LSMATS), and to offer constructive suggestions concerning the further refinement of the draft.

Shannon Chamber greatly appreciates the availability of both Hugh Creegan, Deputy Chief Executive and Director Transport Planning and Investment and David Clements, LSMATS Project Manager to give a presentation on the Strategy to representatives of both the Chamber board and Chamber membership. Direct interaction of this nature with the authors of such strategies is most beneficial as it enables both parties to fully comprehend the collective objectives, which greatly assists in the generation of refinements that match the needs of all stakeholders.

Shannon Chamber maintains a very interactive relationship with its members and has found their input most insightful when responding to submissions of this nature; we have also adopted this strategy when preparing our input to the draft Shannon Town Masterplan and will be doing so when responding to the Clare County Development Plan Issues Paper – plans which also impact on the LSMATS. Shannon Chamber would therefore expect that linkages with Clare County Council and consideration of such strategies have/will also inform the final draft of the LSMATS.

INTRODUCTION

As mentioned during our meeting, the most important factor in devising a Transport Strategy for Shannon is that the totality of Shannon is taken into consideration and the three core elements of Shannon – the Town Centre, Shannon Free Zone, and Shannon Airport, are inter-connected and easily accessible by both residents and visitors alike. Any future development of Shannon must combine the living, working and leisure aspects of the town as a unit, not as separate attributes. This has been pointed out in Shannon Chamber’s submission to the preparation of the Shannon Town Masterplan. It is important therefore that the LSMATS is considered vertically and not functionally i.e. in consultation with the plans being drawn up by both Clare County Council (CCC) and Limerick City and County Council (LCCC) for their respective jurisdictions to ensure cohesion and appropriateness of deliverables.

Having studied the draft LSMATS in detail, Shannon Chamber welcomes the extensive consideration that has been given to Shannon in the preparation of the Strategy, as explained in greater detail in our Teams meeting, particularly with regard to how certain conclusions were arrived at, particularly regarding rail connectivity and park and ride facilities linking Shannon with Limerick.

To maintain consistency of message, this submission will present:

- Commentary on the draft as currently written; and
- A summary of the key points which Shannon Chamber would like to see addressed in the next/final draft.

DRAFT LSMATS ...Suggested Amendments/Additional Comments

Section 1: Introduction

- **P3: Current Challenges: 2nd bullet point**

The existing point made in the document is good but Shannon Chamber would recommend adding the word 'integrated' to the sentence , *'Support a vibrant, accessible and integrated Shannon Town, Airport and Free Zone'* to emphasise, as outlined at our meeting and in the introduction, the requirement for increased interaction between the airport, zone and town. This pertinent requirement, if done correctly, will maximise the impact of existing infrastructure and assets.

- **P4: Vision & Principles**

As highlighted in the Preface, we suggest use of the term 'Atlantic Economic Corridor (AEC)' in all instances as this is the term used in the NPF, other documents and initiatives. The emerging Atlantic Economic Corridor (AEC) initiative is supported through Project Ireland 2040. The AEC is a linear network from Kerry to Limerick, Clare and Galway, through the heart of this region to Mayo, Sligo and through to Donegal, the objective of which is to maximise infrastructure, talent and enterprise assets along the western seaboard to create economic hubs and clusters.

Section 2: Policy Context

- **P14: Regional Level Policy section (centre column P14) & ref to Shannon Town Plan**

Given that a new Masterplan for Shannon Town is being prepared by Clare County Council, it is essential that their work is integrated and referenced in the LSMATS given that the consultants drafting the plan have spent time examining the cycling/walking routes that already exist in Shannon and the potential to link the town, zone and airport through sustainable transport modes, using existing cycle and pathways.

- **P17: Shannon Town & Environs Local Area Plan (2012-2018)**

The Shannon Town and Environs LAP has recently been extended by Clare County Council to 2023.

Section 3: Study Area & Transport Context

- **P21: Current Transport Provision section (centre column, 4th para)**

Reference should also be made to private bus services that serve the Shannon area - for example there are services which use Bunratty for onward connection to Limerick/Cork/Galway/Dublin, etc. These are important indicators of potential demand for Shannon Town, Zone and airport bus services. Whilst it was pointed out at our meeting that private operators can apply for licences, Shannon Chamber would question why this is not happening given that services such as Dublin Coach does not commute into or via Shannon. Feedback received would point to a definitive interest by private operators to provide additional

services on routes, for example, from Sixmilebridge to Shannon and from Shannon Airport to main city locations. Perhaps further explanation is warranted as to what is required of private operators to make such routes commercially viable from a Transport Strategy perspective?

- **P21. Right column – 3rd para**

Potential routes for a spur rail link between Sixmilebridge and Shannon have been identified a number of years ago. A land preservation policy has been adopted in Shannon Local Area Development plans to facilitate implementation of a rail link at a future point. Shannon Chamber acknowledges the fact that a detailed modelling exercise was carried out by the NTA when examining the different modes of transport, including rail, and that the outcome of the modelling was that there simply would not be enough usage to justify the rail link; a reliable high-frequency bus transport was considered a better option for people commuting between Shannon and Limerick. We would, however, recommend that the concept of light rail linking Limerick, Shannon, Sixmilebridge and Galway warrants further examination as the trend, as outlined, in the Preface, is that this type of connectivity could become more beneficial in the future... given the requirement to reduce our carbon footprint, rail might be a faster and direct method of transport and a driver of rail spur development.

As a short-term proposal, a shuttle bus linking e.g. Sixmilebridge to Shannon might warrant consideration given that circa 40% of this 'village's' population (6,000 – 7,000) commute to Shannon on a daily basis between schools and work.

- **P22 (column 1, last para)**

As outlined at our Teams meeting, Shannon offers significant potential for cycling and walking using the existing network of off-road and riverside pathways and rural roads. These are used as informal networks by people in the town and the surrounding area. While current policy proposals seem to concentrate more on using the road network for cycling and pedestrian paths and, having listened to the 'safety' justifications for that and the fact that this Strategy's main aim is to reduce car dependency, Shannon Chamber members and local residents nevertheless believe that this is a 'missed opportunity'. Given the work that will be undertaken with the upcoming flood relief works in Shannon, we believe this presents an ideal opportunity for joined-up action. The infrastructure already exists and a low level of investment in mapping, signage and maintenance would generate a significant impact and sustainability return; increased usage of such resources would serve to embed the benefits accruing to cycling in mindsets and greatly assist in delivering the main objective of this Strategy – a reduction in car usage dependency.

Centre column, paras 3,4, 5

The text in these paragraphs is based on road network and footpaths only. As our Teams meeting will have shown, the abundant green areas in Shannon, which include a long-established network of "black paths" developed as the town was built, offer real potential for attractive and green walkways and cycleways.

- **P23 (centre column, para 2)**

The enhancement and management of the road network for the movement of strategic traffic could be addressed by reference to a 4th river crossing of the Shannon, as outlined during our Teams meeting. Accepting that this cannot be delivered in the short term, including it as a long-term project of strategic benefit to Shannon, Limerick, Foynes and the wider hinterland, would help to influence future direction and shape. For example, a river crossing from the northern shore of County Limerick to Shannon could create the potential for a significant city of scale and enhance the served market for Shannon Airport. This would also enhance Shannon Foynes Port and create the potential for an orbital route around the airport and the greater Limerick Shannon Metropolitan Area.

Right Column – Recent Improvements; Last bullet point

The development of the river walk in Shannon was a welcome development but involved about 2km of improvement and additions to a much longer and extensive pre-existing network of riverside pathways. Shannon Chamber would suggest that it is essential that the LSMATS pushes this to the next level to, as shown during our meeting, develop a link to Bunratty and onwards to Limerick as well as other parts of Clare. This is referenced later but the route between Bunratty and Shannon does not include the full existing network. It offers potential for both pedestrian and cycle use.

Section 6: Walking

- **P37: Centre Column – Shannon**

Consideration needs to be given to the fact that the 1970's Shannon Town Amenity Plan provided for 150,000 trees and 15 km of pathways through landscaped and green areas. This is existing infrastructure which can be updated, regenerated and further developed to provide the types of sustainable and people friendly walk and cycleways envisioned in the LSMATS for Shannon. Clare County Council has completed some upgrading in recent times, which is very welcome. The consultants tasked with drawing up the current Shannon Town Masterplan have walked these areas and have access to the 1970's plan and reference material. This fact that the infrastructure is in place provides an opportunity to extend the walkway to Bunratty along the riverside, using existing green and landscaped areas, not roads, and to extend further to Limerick along the riverbanks as set out in LSMATS. Shannon Chamber would welcome this being given consideration in the revised Strategy.

- **P38: Objective WK4 section ref to Shannon**

The looped walks mentioned here – Estuary Trail West; Sli na Mara Trail; Estuary Trail East; and Free Zone Estuary Trail - are based on hard pathways next to roads around the town. We believe that the opportunity has been missed to date to refocus walkways on the existing black path network that already exists and is extensively used in the town. The existing Shannon Walks' signage does not include direction indicators, lacks a map or wayfinding and is focused on urban footpaths and roadways not greenways.

- **P39: Supporting Measures: Objective WK5 bullet point 1**

Why just Limerick? Shannon Chamber would recommend, as in the above paragraph, that a wayfinding system also needs to be developed for Shannon.

- **P41: Walkable Neighbourhood Limerick**

Shannon Chamber commends LCCC on the production of this excellent map and suggests that a similar map would be most beneficial for Shannon and could be easily produced by Clare County Council, using the existing river and green area walkways. This would link with the Shannon Estuary Way, of which Shannon is part, which is a loop of the Wild Atlantic Way and includes both Clare and Limerick. There are multiple options to map out 2 to 5-minute walk segments from Airport, Zone, Town and amenity areas of Shannon. The routes already exist. This is not an infrastructural but a branding and communications issue and something Shannon Chamber would be keen to see being delivered as a recommendation from the LSMATS.

Section 7: Cycling

- **P46: Column 1 last bullet point, section 1**

As stated already, the greenway network needs to be extended to include Bunratty to Shannon, using the banks of the River Shannon.

Centre Column; Shannon Cycle Network

Shannon Chamber agrees that Shannon has significant potential for cycling but the concept needs to be expanded beyond linkage to the road network. To encourage a greater uptake and appreciation of cycling as a leisure activity and as a mode of transport, the potential to expand on the quiet and green area cycleways in Shannon using the existing path network and riverside amenities, exists. Doing so would make it possible to cycle from Shannon Airport to Shannon Town and on to Bunratty on a riverside greenway with spurs to other locations such as the Shannon Free Zone along the way. This would be beneficial to residents, workers and visitors alike and serve to link the living, working and leisure aspects of Shannon.

- **P48: Long-Stay Cycle Parking (para 2)**

The provision of long-stay parking and cycle parking hubs would be equally beneficial to Shannon, Shannon Free Zone and Shannon Airport. The concept of a dockless bike system for Shannon, as referred to in our Teams meeting, would be a welcome development for Shannon. Shannon Chamber would very much support the delivery of such a piece of infrastructure.

- **P49 Map**

As referenced during our meeting, consideration should be given to continuing the cycle line along the riverside in Shannon and on to the airport, moving away from the road network to include green areas where there are existing pathways. There is also an opportunity to piggyback on the upcoming flood relief works. Shannon Chamber would recommend that this opportunity should not be missed.

Section 10: Roads and Streets

- **P70: First para, first column**

Shannon Chamber would suggest that the multiple access points to Shannon from the N18 serve to balance out the current traffic flow. The differing peak travel patterns translates into people accessing their workplaces using different routes in and out of Shannon depending on the time of day. Shannon Chamber would welcome more discussion on proposals in this regard and how they would best serve the 10,000+ people that (in pre-COVID times and hopefully in the future) travel in/out of Shannon daily for work.

Shannon Chamber welcome reference to the upgrade of the N19 and would recommend that this be upgraded from the single carriageway road layout and, that the current capacity constraints on the N19 junctions connecting Shannon Free Zone and the town be addressed.

- **P70: Regional Roads**

Shannon Chamber would welcome:

- the development of a signalised junction on the R471 at Smithstown and a new link road to connect the junction with the existing road at Smithstown.
- The upgrade of the junction of L3126 and Low Road as it approaches at Bunratty.

- **P76: Off-Street Parking; Last para, right column**

Shannon Chamber welcomes reference to a review of parking in Shannon Town being undertaken and the development of a Parking Management Strategy but suggests that this should include a review of the

Shannon Town Centre car parking. For example, the blocking of a previous access point at the Lidl roundabout had a big impact on traffic behaviour.

Section 12: Freight, Delivering and Servicing

- **P80: Rail-based freight**

Shannon Chamber would suggest that any review of rail freight should take into account work on the Western Railway rather than seeing Limerick to Foynes as a self-contained piece. The development of renewable energy (wind) along the Atlantic Economic Corridor will require interlinked and sustainable port and transport facilities; the Port of Foynes is a strategic part of this network.

Section 13: Supporting Measures

- **P84: Centre Column – Obj SM4 – last bullet point**

As mentioned already, when commenting on P39 of the LSMATS, any enhancement of wayfinding should also take account of the needs of Shannon and other key areas, not solely Limerick.

- **P85: School Travel Planning – first 2 lines, 2nd para**

Shannon Town, as a compact area, offers significant potential to test walk and cycle-to-school initiatives using quiet ways based on existing pathways.

- **P87: Autonomous Vehicles – right column**

As discussed at our Teams meeting, plans for the development of a publicly funded, private sector-led Future Mobility Campus in Shannon as a test bed for the development of autonomous vehicles, offers huge potential to test out many of the concepts in LSMATS. Shannon Chamber would welcome linkage and discussion on current opportunities offered by CAV technology and the challenges being faced in its progression vis a vis legislation.

Electric Scooters ...in this context and when referring to legislation, Shannon Chamber was delighted to hear that, while not currently a legal mode of transport, that reference to their being an acceptable and viable mode of transport will be included in the LSMATS. Shannon Chamber believes that this mode of transport will be especially suitable to Shannon and greatly assist in linking the various strands of the town – Town Centre, Shannon Free Zone and Shannon Airport and should be permitted for use on pedestrian bridges.

Summary of key points from Shannon Chamber

Walking (Section 6)

- Improve walkways in and around Shannon to allow for better accessibility between services in the town centre, the key employment hub of the Shannon Free Zone and Shannon Airport.
- The abundant green areas in Shannon, which include a long-established network of "black paths" developed as the town was built, offer real potential for attractive and green walkways and cycleways.
- Extend the walkway/cycle way from Limerick to Bunratty to Shannon using existing riverside infrastructure – using existing green and landscaped areas, not roads.
- Refocus walkways in Shannon on the existing black path network that already exists and is extensively linked to the town.
- Upgrade the existing Shannon walkways signage to include direction indicators – develop a wayfinding system for Shannon.
- An outcome from the LSMATS should include a recommendation that a walkable neighbourhood map be created for Shannon.
- Ensure that the pedestrian environment is significantly enhanced, more attractive and safer than at present, particularly around key visitor attractions such as King John's Castle.
- Enhance wayfinding in both Shannon and Limerick City Centre with a focus, in Limerick particularly, on ensuring ease of access to key tourist sites.

Cycling (Section 7)

- Designate a coherent network of cycle routes and cycle hubs across Shannon which will provide access to Shannon Airport, Shannon Free Zone and Shannon Town.
- Expand the Bicycle Sharing Scheme to Shannon.
- Development of cycling and walkway from Shannon to Bunratty /Sixmilebridge and following the riverbank to Limerick
- Shannon offers significant potential for cycling and walking using the existing network of off-road and riverside pathways and rural roads.
- Consider pilot testing walk and cycle-to-school initiatives in Shannon using quiet ways based on existing pathways.
- Create long-stay parking and cycle parking hubs in Shannon, Shannon Free Zone and Shannon Airport.
- Introduce a dockless bike system for Shannon.
- Extend the cycle line in Shannon to take in the riverside in Shannon and on to the airport; achievable through piggybacking on the upcoming flood relief works.

BusConnects (Section 8)

- Implement more direct inter-regional bus services between Shannon Airport and the second-tier cities of Galway and Cork.
- Assess how private operators can be licenced to operate on routes noted in our commentary on P3/4 (Section 3... comments related to P19) of this submission.
- Connect with Shannon to Limerick City Centre and other key locations such as UL and LIT via a fast frequent and reliable bus service.
- Develop Park and Ride in both directions – Shannon to Limerick and vice versa and to facilitate access to e.g. inter-city buses also.

Rail (Section 9)

- Shannon Chamber would recommend that the concept of light rail linking Limerick, Shannon, Sixmilebridge and Galway warrants further examination as the trend for this type of connectivity could become more beneficial in the future... given the requirement to reduce our carbon footprint; light rail might be a faster and direct method of transport and a driver of rail spur development.
- As a short-term proposal, a shuttle bus linking e.g. Sixmilebridge to Shannon might warrant consideration given that circa 40% of this 'village's' population (6,000 – 7,000) commute to Shannon on a daily basis between schools and work.
- Review rail freight taking into account work on the Western Railway. The development of renewable energy (wind) along the Atlantic Economic Corridor will require interlinked and sustainable port and transport facilities.

Roads & Streets (Section 10)

- Upgrade the N19 approach road to Shannon Airport from the current single carriageway road layout.
- Address capacity constraints on the N19 at junctions connecting to the Business Park and Town.
- Develop a new signalised junction on the R471 at Smithstown and a new link road to connect the junction with the existing road at Smithstown.
- Upgrade the junction of L3126 and Low Road (and its approaches) at Bunratty.
- Review Shannon Town Centre parking including rationale for blocking a previous access point at the Lidl roundabout and its negative impact on traffic behaviour.
- Advance the M20 project linking Limerick and Cork and the Limerick Northern Distributor Road.
- Consideration should also be given to a future upgrade of the Limerick to Kerry route to facilitate easier access to Limerick, Shannon Airport, Galway, and the west of Ireland.

Traffic Management (Section 11)

- Develop an integrated coach management scheme to support traffic management measures at key locations.

Freight, Delivery and Servicing (Section 12)

- Rather than limiting the size of HGVs accessing Limerick city centre, to be replaced by smaller vans with a higher environmental impact, Shannon Chamber suggests assessing the feasibility of developing a consolidation centre outside the city as a means of reducing the number of HGVs entering the city.
- Consider impact online shopping and the associated doubling of van delivering in the last 6 months alone. This is increasing carbon footprint, particularly in rural areas where distances required for each delivery are higher than in urban locations.

Supporting Measures (Section 13)

- Support the development of the Connected Autonomous Vehicle (CAV)/Mobility as a Service (MaaS) sector in the Shannon area including Unmanned Ariel Vehicle (UAV) R&D.
- Consider the likelihood of future unexpected occurrences which could further alter the pattern of living and working.
- Consider the benefits of a 4th River Shannon crossing for long-term delivery. Potential to deliver a significant city of scale and enhance the served market for Shannon Airport. enhance Shannon Foynes Port, and create the potential for an orbital route around the airport and the greater Limerick Shannon Metropolitan Area.

Housing – Impact on Transport

- The regeneration of cities and town will see an increase in the number of families and individuals opting for city-centre living. Consider the impact remote working on city-centre office accommodation and the potential to regenerate such buildings to living spaces. Regeneration needs people and people needs better cycling, walking and a fast and easily accessible mode of transport.
- Rural areas will also benefit from remote and hub working but will also require access to urban areas such as Shannon and Limerick city. This trend needs to be factored into the delivery of an all-encompassing Transport Strategy.

General Commentary

Given the level of change necessitated by COVID-19 and the growth in remote working, which is reducing worker commuting to major employment centres, it would be beneficial to factor this and any future such potential impacts on transport patterns into the drafting of the LSMATS, as this might further impact the way we live our lives.

We suggest that transport can be broken down into 5 main categories:

- Daily Commuter
- Delivery network
- Family shopping and discretionary journeys
- International travel/tourism
- Entertainment/Cultural/Sport events

For the commuter and most of the categories above, public transport is currently a poor substitute for the private vehicle when considering cost, convenience, efficient use of time especially in the morning, personal safety and availability to and from the outgoing final destination. People, particularly in non-urban centres, do not generally use public transport (unless they are travelling free) if they have any other alternative.

Unless there is a change in policy and practice, people will not transfer to public transport; interventions to change habits will take time but will be considered if the benefits are obvious and widely promoted. Could lessons be learnt from countries such as the Netherlands, where public transport is expensive yet a high percentage of the population already use it?

The view of Shannon Chamber and its membership is that, for public transport to work in Ireland, with a population so spread out, it has to operate like the courier, 'Hub and Spoke' model, with intercity high-speed transit time journeys connecting the cities, supported by local and frequent transport connections within each city and the surrounding areas, including park and ride locations on the periphery, as mentioned during our Teams meetings.

For this to be successful, the local transport network would need to be frequent, smaller, and environmentally friendly. The ideal solution for this type of local network could rest in some type of electrified autonomous trams or buses. The Netherlands, for example, utilises electrified buses powered by overhead power cables. In Antwerp, Belgium, the tram network is at surface level with as many stops as required where the only infrastructural requirement for a stop is a platform, with the last kilometre of the journey going underground at the city centre.

While not addressed in this LSMATS, we would question, is the current location of Limerick train station the most ideal location to sustain meaningful growth?

Our final suggestion is that the LSMATS should also consider the challenges facing Shannon Airport and position it to be best placed for potential future growth.

A Collaborative Undertaking

The Submission has been made possible by a series of contributions – phone call, emails, virtual meetings - between Shannon Chamber board of directors, Chamber membership, a meeting with the National Transport Authority as mentioned overleaf and, our involvement in the Transport and Mobility Forum involving key stakeholders in Limerick/Shannon.

The collective dialogue has enabled us to present commentary which, we believe, if taken on board, will foster a greater appreciation for and uptake of transport in all its forms in Shannon and the greater Limerick / Shannon Metropolitan Area.

ENDS

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29 October 2020



**Shannon
Chamber**
Advancing business together

Draft Regional Spatial & Economic Strategy

for the

Southern Region

Shannon Chamber Submission/Response

March 2019

Brief Guide to Submission Contents

Part 1 (Pages 3 to 4 of this submission document)

- General Introduction to Chamber submission
- Reference to key principles in submission to SRA by Atlantic Economic Corridor (AEC), of which Shannon Chamber is a part
- Cross reference in Introduction to key points made by Chamber relating to specific sections of RSES later in document

Part 2 (Pages 5 to 13 of this submission document)

- Detailed submissions and suggested additions/amendments by Chamber to existing Draft RSES
- These are related to specific Pages, Topics, Sections and Regional Policy Objectives (RPOs) and MASP Policy Objectives of RSES Draft in each case, as specified

Shannon Chamber Submission to RSES Draft

PART 1

INTRODUCTION

- Shannon Chamber welcomes the opportunity to make a submission, and to offer constructive suggestions, concerning the RSES for the Southern Region.
- We believe that the existing draft contains very important plans for the whole region.
- However, we have identified a number of practical suggestions, proposals, additions and amendments that, we believe, would greatly strengthen its overall potential spatial and economic impact, particularly in regard to the greater Limerick-Shannon Metropolitan Area.
- In the following document, we set out our considered views in this regard, and relate these to the various relevant headings and sections of the draft document, as circulated.
- This input is primarily designed to develop further the potential of the Limerick-Shannon MASP as an integrated and dynamic driving force for growth, which would greatly assist the Southern Region Assembly in its efforts to maximise its contribution to national development [See Pages 9 to 13 in particular]
- As one example of how this potential can be achieved in the years ahead, we suggest that more provision is made for various coordinated actions and planning initiatives that can highlight and build upon the inherent economic, social, lifestyle and spatial links between Limerick-Shannon and the immediate hinterland areas – thereby significantly enhancing the area’s future economic impact and growth. [See Land Use & Transportation Section (Pages 5-7) and Travel & Tourism (Pages 8-9) for specific proposals and content related to this point]
- Other headings commented on in this document include Employment and Enterprise (Page 7), Capacity Building (Pages 7-8) and Monitoring and Evaluation (Page 9).
- Shannon Chamber concentrates in this submission on both points of principle and detail.

- The Chamber supports the key principles put forward by the Atlantic Economic Corridor (AEC) in its submission separately lodged with SRA. These are outlined below:

Key Elements of AEC Submission which Shannon Chamber supports

- The Draft RSES is not supported by a sound economic strategy. An economic study should be conducted at the earliest possible date so as to inform the RSES.
- The AEC should be designated as a special Economic Zone, which would be managed across the SRA area and the NWRA area by appropriate Government Agencies. This aspiration should be reflected in the RSES.
- The RSES should include, as an RPO, that a “High-Value, Low-Carbon Economy” strategy should be developed and implemented at the earliest possible date and that this should be a key driver for economic development.
- A study of broadband delivery should be undertaken annually to include a review of the delivery and effectiveness of the National Broadband Plan and to make recommendations for appropriate interventions and policies to be implemented so as to facilitate the development of a Smart Region.
- An extra Item c. should be added to Regional Policy Objective 135 as follows:
“Support and actively promote the designation of the TEN-T Core Network within the SRA Region from Cork, through Kerry through Limerick, into Clare and then linking with the NWRA area to Galway and ultimately to Sligo and North Donegal”.
- The following should be added to Regional Policy Objective 92:
“The Assembly will promote the preparation of a grid transmission strategy for the Region with a timeline to at least 2040.”
- Population growth at any particular location should be in response to economic opportunity and consequent development. We caution about trying to specifically set out how the population growth would be geographically dispersed; any figures projected in the Draft RSES should not be construed as being limits or caps on population.

Shannon Chamber Submission to RSES Draft

PART 2

DETAILED SUBMISSIONS RELATING TO DRAFT

Existing Plan Content	Shannon Chamber Submission: Land Use and Transportation
<p data-bbox="263 510 515 689"><i>Page 36</i> <i>Section Limerick-Shannon MASP Integrated Land use and Transportation</i></p> <p data-bbox="359 734 406 768">and</p> <p data-bbox="287 813 478 918"><i>Page 261</i> <i>Section 4.1 Transportation</i></p> <p data-bbox="359 963 406 996">and</p> <p data-bbox="263 1041 494 1146"><i>Page 262</i> <i>Limerick-Shannon MASP Objective 7</i></p>	<p data-bbox="547 510 1386 689">Shannon Chamber requests that a number of roads relating to the Shannon area should be specifically included, or referred to, as appropriate in the sections, including in the Limerick – Shannon MASP Transport Strategy, listed in first column opposite [Existing Plan Content). These include:</p> <ul data-bbox="547 739 1386 1792" style="list-style-type: none"> <li data-bbox="547 739 1386 996">• N19 connecting traffic from the N18/M18 to Shannon business parks and Shannon Airport: the upgrade of sections of this road, most notably from the roundabout at the entrance to Shannon Free Zone and onwards to Shannon International Airport, should be listed as a priority item in this section and also taken into account in the Limerick – Shannon MASP Transport Strategy. <li data-bbox="547 1008 1386 1187">• R471, which funnels local traffic off the N18 into Shannon Town and onwards to the Free Zone, business parks, housing and amenities in Shannon, is not of a standard befitting a town with a residential population of almost 10,000 and a daytime population of over 18,000 people. <li data-bbox="547 1198 1386 1489">• Adequate access of an appropriately high standard into and out of Shannon is an essential element of Shannon’s economic fabric. Shannon is not just a town boundary; it requires an infrastructure that links all residents of Shannon – living and working – and visitors to Ireland and the region, to Limerick and Galway cities and neighbouring towns in Co Clare and beyond. It is also a key element of the Atlantic Economic Corridor (AEC) catered for in this RSES. <li data-bbox="547 1500 1386 1792">• L3126 – linking Bunratty village to Bunratty Castle: Given Bunratty Castle and Folk Park’s positioning as a key flagship tourism product, attracting in excess of 350,000 visitors per annum with potential for significant growth: an upgrade and alignment of this connector road is imperative to accommodate increasing levels of traffic, including coaches, into the visitor car park, and to facilitate the safe passage of residents to their homes on this road.

<p>Page 158 Section 6.3.6.4 and Page 161 National Road Projects and Page 161 RPOs 160 and 161</p>	<ul style="list-style-type: none"> • The above four points are also relevant to the sections listed in column 1 and should be added to/integrated into them. • While the immediate priority is to enhance and upgrade existing infrastructure, Shannon Chamber would recommend that a futuristic approach to Point 1 in RPO 160 would be to consider a ‘Shannon Crossing’ at Shannon linking Clare and Limerick and, in so doing, create a very strong metropolitan growth area, connecting the two counties from another arterial direction. This would also link Shannon to Foynes and Askeaton, thereby enabling the N69 to become a much more multi-modal transport artery. Another benefit would be to provide an alternative access to route into and out of Shannon in the event of any major emergency.
<p>Page 161 Point 1, RPO 160</p>	<ul style="list-style-type: none"> • While Shannon Chamber welcomes the inclusion in 6.3.6.4 (i) of the statement that this RSES ‘supports the ambition to create a rail link between Limerick City and Shannon’, we would recommend that the reservation retained by Clare Co. Council for a spur line to link Galway – Athenry – Ennis – Limerick line into Shannon Airport should also be considered, given that it would avoid any planning obstacles in the future and would enhance the improvements already made to this route.
<p>Page 162 RPO 162</p>	<ul style="list-style-type: none"> • Provision for upgraded and more frequent Direct bus connectivity from Shannon Airport to Galway and Cork should be included here also, as this level of connectivity is a critical component of the region’s transport infrastructure.
<p>Page 163 RPO 163</p> <p>Page 158 6.3.6.4 Priorities for Transport Strategy</p> <p>and</p> <p>Page 160 RPO 158 And</p>	<p>There is scope for the implementation of a number of coordinated actions relating to land use and provision of multi-modal transport/recreation services in the Shannon-Limerick area that could potentially reap rich dividends in future years. This could entail:</p> <ul style="list-style-type: none"> • Provision being made for land acquisition to enable the development of Walkways/Cycleways from Shannon to Bunratty and onwards to Limerick, Sixmilebridge and other locations, building on existing pathways and infrastructure

<p>Page 162 RPO 162 And Page 163 RPO 163</p> <p>And Page 164 RPOs 165-166</p>	<p>and following on from the planned Estuary flood land bank works at Shannon</p> <ul style="list-style-type: none"> • The aforementioned additional Shannon Crossing and long-term provision for rail connection to Shannon • Improved road networks linking Shannon – M18/N19, Shannon Town, Bunatty • Improved direct bus connections to Shannon <p>Shannon Chamber recommends that this multi-modal transportation and land use approach is inserted into Point 6.3.6.4 and reinforced in the relevant other sections dealing with specific aspects.</p>
<p>Existing Plan Content</p>	<p>Shannon Chamber Submission: Employment and Enterprise</p>
<p>Page 36 Section: Employment and Enterprise</p> <p>Page 93</p>	<ul style="list-style-type: none"> • While mention is made of Shannon Free Zone, the expanse of industrial activity needs to be referenced here, i.e. the multi-sectoral spread of activities in both manufacturing, international and financial services, and distribution. The contribution Shannon is making (via Jaguar Land Rover) to the development of connected and autonomous vehicles (CAVs) will lead to a requirement for CAV test bed infrastructure in Shannon and the wider region, which will position the Mid-West and Ireland as a leader in this technologically innovative space. • Sectoral Development Opportunities in the SRA should also include: AVIATION and CONNECTED & AUTONOMOUS VEHICLES (CAVs)
<p>Existing Plan Content</p>	<p>Shannon Chamber Submission: Capacity Building</p>
<p>Page 105 RPO 173 and Page 254 Limerick-Shannon MASP Policy Objective 3</p> <p>Page 115 RPOs 87 and 88</p>	<p>Funding to support the development of test beds for CONNECTED AUTONOMOUS VEHICLES (CAVs) in Shannon, which will give the Mid-West region, within the SRA, competitive advantage in an emerging technology, warrants inclusion here.</p> <ul style="list-style-type: none"> • The ability of CAV technology and the creation of related test bed infrastructure at Shannon need to be included here also, as this transformative technology will positively contribute to decarbonisation in the transport sector. • As referenced in the Atlantic Economic Corridor (AEC) response to this draft RSES, the AEC area:

	<p><i>“offers significant future opportunity in terms of attaining an economy that is ‘Green’; based on the use of renewables and based on sustainable practice throughout all sectors of our economy.”</i></p> <ul style="list-style-type: none"> • Shannon Chamber supports the AEC call that this RSES should include an RPO for ‘Strategy to develop a “High-Value, Low-Carbon Economy” to be developed and implemented at the earliest possible date, given that there is a lot of unrealised capacity in the west in wind and wave energy, which would make a significant contribution to our carbon reduction commitments. • Such a strategy should include the provision of a CAV test bed.
<p>Existing Plan Content</p>	<p>Shannon Chamber Submission: Travel and Tourism</p>
<p>Page 95 RPO 51 and Page 271 6.8 Tourism and MASP 15</p> <p>Page 103 Trade – Access to International Markets RPOs 66, 67 & 68</p> <p>Page 103 Trade – Access to International Markets</p> <p>Page 149 RPO 144</p>	<ul style="list-style-type: none"> • There is a requirement for the creation of a new tourism project of scale in the Shannon area to add to the attractiveness of the region and to enhance the visitor experience. • To ensure that airports in the SRA Region have access to a strategic EU hub, and that second-tier cities can be developed to their optimal post-Brexit thereby maximising national economic development, Shannon Chamber requests that a funding mechanism be put in place to support strategic route development for airports in the Region. • In relation to reference to pre-clearance at Shannon Airport being extended to products, any initiative that would seek to implement this would require US legislative changes. Such a measure would pose significant time and cost commitments and is likely to be outside of Irish control. In an Irish context, it would make more sense to have measures that would encourage new services such as a funding mechanism for new routes. • Shannon Chamber suggests that the word ‘regional’ be removed from the title and sentence, and that RPO 144 states that a RSES Airport Strategy be developed for all airports in the SRA and NRA regions, thereby ensuring that the economic and social potential of the whole country is developed to the full over the coming years.

<p>Page 149 RPO 145 Point b.</p> <p>Page 149 RPO 145 Point c.</p>	<ul style="list-style-type: none"> Shannon Chamber suggests that Exchequer funding be made available to all airports with under 3 million passengers p.a. (as permitted under EU Guidelines) to enable them develop as gateways for industry and tourism in the region. An extra point (c.) should be added here to refer to the provision of a Strategic Fund be put in place (as referenced also in relation to RPOs 66 – 68, see Page 103 of RSES draft) to support strategic route development for airports throughout the country to support the development of industry and tourism in the regions.
<p>Existing Plan Content</p>	<p>Shannon Chamber Submission: Monitoring and Evaluation</p>
<p>Page 201 RPO 219</p> <p>Page 201 RPO 220</p>	<ul style="list-style-type: none"> This RPO should also reference supporting State Bodies as well as Local Authorities. Shannon Chamber suggests that this RPO should also include the 'private sector' in the drawdown of climate and smart technology funds.
<p>Existing Plan Content</p>	<p>Shannon Chamber Submission: Draft Limerick-Shannon MASP</p>
<p>Page 253 Section 1.4 Heading: The attributes of Shannon</p>	<p>Suggest the following should be added to/incorporated into bullet points under this heading:</p> <ul style="list-style-type: none"> Shannon has a day time population of 18,000 people, with over 8,700 people working within the Shannon Free Zone in over 160 companies Shannon was ranked as No 1 for economic potential among Micro European Cities of the Future 2018/19 by FDI Intelligence Shannon was ranked as No 2 for business friendliness among Micro European Cities of the Future 2018/19 by FDI Intelligence Shannon was ranked as No 4 for connectivity among Micro European Cities of the Future 2018/19 by FDI Intelligence Access to four third-level colleges/institutes including the world- renowned NUIG Shannon College of Hotel Management Leading FDI and indigenous enterprise location within the MASP area attracting emerging sectors such as CAV and Lifesciences, e.g. Jaguar LandRover and Edwards LifeSciences International Airport with a capacity for 4.5 million passengers and, with US Pre Clearance for Passengers, is the International Gateway for the West of Ireland.

<p>Page 253 Section 1.4 'The infrastructural requirements for Shannon include:'</p>	<ul style="list-style-type: none"> The final bullet point hints at some of the investments required in 'Shannon the Living Town'. However, this final bullet point should be strengthened by adding the following to the sentence (or by setting out as an additional bullet point): <i>involving the need for investment in the delivery of civic, community and creative facilities as set out in policy documents and plans, which are required to attract and retain the high-value skilled workers to be employed by the blue-chip, internationally traded companies investing in Shannon Free Zone"</i>
<p>Page 253 Section 1.4 Suggested Additional Heading under this section</p>	<p>Shannon Chamber suggests the inclusion of an additional Heading and related text here: suggested wording as follows:</p> <p>Signals of Confidence</p> <ul style="list-style-type: none"> <i>Commercial investment in the Shannon Free Zone is promoting the MASP as a competitive location for international FDI services as well as supporting indigenous industry.</i> <i>Advancement of the development of a CAV R&D hub and testbed in Shannon including the decision by Jaguar LandRover to open a CAV R&D facility in Shannon</i> <i>Progress on regenerating the Shannon Free Zone with 650,000 sq ft of enterprise space developed in the period 2015-2018</i> <i>Active regeneration initiatives by Shannon Group are ongoing, with plans for significant investment in the Shannon Free Zone, the Airport and key tourist attractions in the MASP area.</i> <i>Progress on the development of a new wide-body Hangar by Shannon Group – the first hangar in Ireland in over 20 years</i> <i>Recent completion of the Gateway Hub Co-Working space by Shannon Group</i> <i>Launch of Propeller Shannon Incubator Programme</i> <i>Progress on the upgrade of the N19 road to the Airport, which will facilitate the continued expansion and regeneration of Shannon and improve safety and the public realm.</i>
<p>Page 254 Section 1.5 MASP Policy Objective 3</p>	<ul style="list-style-type: none"> In relation to this Objective, we suggest that the current wording of Objective is subdivided as follows into various points: <i>The Limerick Shannon MASP recognises Shannon and its assets as a significant regional strength and employment centre. It is an objective to support and promote Shannon as a centre for research and development for autonomous vehicles which will complement Shannon's role as a world leader in aviation and aerospace, engineering, manufacturing and distribution.</i>

<p>Page 256 Section 2.2 Education</p>	<p><i>Seek investment to continue the regeneration of the Shannon Free Zone as a high-quality, mixed-use business park developed to the highest standards of design.</i></p> <p><i>Seek investment to deliver a CAV R&D testbed in Shannon which will be a transformative project for Ireland</i></p> <p><i>Strengthen the attributes and opportunities of Shannon, including transformative initiatives such as the development of a micro Smart City infrastructure.</i></p> <p><i>Strengthen <u>direct</u> bus connections between Shannon and Limerick City, and Shannon and the 2nd tier cities of Galway and Cork.</i></p> <p><i>Develop and deliver projects of scale which will enhance Shannon the Living Town and reinforce its ability to attract and retain the skilled workers and visitors that are central to the growth and success of Shannon’s strong Airport and Enterprise strengths.”</i></p> <ul style="list-style-type: none"> • Wording should be changed to reflect the fact that the Limerick-Shannon Metropolitan Area is home to FOUR Colleges, i.e. it also includes Shannon College of Hotel Management (NUIG) and this also increases the student numbers to well over 6,000 and adds hotel management as an additional discipline.
<p>Page 259 Section 3.0 National Enablers</p>	<p>Suggest the following should be inserted as additional National Enablers or added to existing text, as appropriate:</p> <ul style="list-style-type: none"> • <i>Delivering ambitious, large-scale, mixed-use enterprise regeneration projects in the Shannon Free Zone, including transformative initiatives such as the development of a micro Smart City infrastructure</i> • <i>Development of a CAV R&D testbed in Shannon to support the emerging CAV cluster within the Mid-West</i> • <i>Enhanced inter-regional connectivity through improved direct bus connectivity from Shannon International Airport to the 2nd tier cities of Galway and Cork</i> • <i>N19 upgrade (approved) and improved layout and junction upgrade on R471 to facilitate the development of Shannon Free Zone, Shannon Airport and Shannon Town</i> • <i>The continued expansion of the City’s third level institutions and the NUIG Shannon College of Hotel Management along with integration with the wider City and region.</i>

Page 263
Section 5
Housing and
Regeneration
Last paragraph

- Certain proposals regarding the need for investment in the delivery of civic, community and creative facilities to enhance Shannon's appeal as a Living Town are outlined in our submission relating to page 253 Section 1.4.

In addition Shannon Chamber recommends that the current last paragraph is deleted and replaced with the following:

- Shannon attracts a working population of 11,400 per day but a number of steps are required to ensure that the town continues to grow its population into the future. In order for Shannon's population growth to achieve its true potential, there is a need for the relevant authorities to deliver parcels of zoned and serviced lands for residential development in order to ensure that there is a plentiful supply of the full range of quality housing options. In that context also, we request the final RSES to allocate a sufficient population target to match the ambitious growth of Shannon town (See Page 306 of RSES).

Page 265
Section 6.2
Table 5 and
supporting text

- Suggest a new table is inserted to reflect significant infrastructure facilities and multi-sectoral industrial space being provided at Shannon: see details below

Location	Project
Shannon	- Wide-body Paint Hangar (1 st in Ireland for over 20 years) - Over 94,000 ft ² (completion end 2019)
Shannon	- Advanced multi-purpose industrial units suitable for light and heavy industry (completion in 2020)

- Add to bullet points on investment to support SFZ by inserting a reference to:

"the need to invest in Shannon Town Centre, civic/community and creative facilities and a mix of housing types in order to enhance Shannon the Living Town which, in turn, will increase the potential to attract and retain the skilled workers and visitors which are essential to the future prosperity of Shannon Airport and Shannon Free Zone."

Page 265
Section 6.2
Table 4 and
supporting text

<p>Page 268 Point c., MASP 11</p>	<ul style="list-style-type: none"> Shannon Chamber welcomes the inclusion of references to IASC and suggests slight changes to the wording of this objective, as follows: <i>The Limerick-Shannon MASP recognises and supports the role of IASC in enabling the Mid-West Region to avail of a unique opportunity to become a global player in the aerospace industry. In addition to the objective to develop the IASC cluster at Shannon, as recognised in National Aviation Policy, that work is also progressed to ensure that <u>cross-agency cooperation</u> will continue to develop IASC at Shannon to meet industry demand.</i>
<p>Page 270 MASP 13</p>	<ul style="list-style-type: none"> The focus on the further development of the retail sector in Limerick is worthy, given its city status; however, with a resident population of almost 10,000 and a daytime population of over 18,000, the development of this sector in Shannon is also a critical requirement to ensure Shannon grows as a living town as opposed to a working town.
<p>Page 272 6.9 Innovation & a Smart Metropolitan Area MASP Objective 16</p>	<ul style="list-style-type: none"> Shannon Chamber requests that the potential for Shannon to be an innovative smart area is recognised through the insertion of the following as Points d. and e. in this Objective: <i>“It is an objective to strengthen the attributes and opportunities of Shannon, including seeking investment for transformative initiatives such as the development of a micro Smart City infrastructure in the Shannon Free Zone.”</i> <i>“It is an objective to seek investment in the development of a CAV Testbed in Shannon which will prove a key driver for the region.”</i>
<p>Page 273 MASP 17</p>	<ul style="list-style-type: none"> Shannon Chamber recommends that additional focus is given to the last point in MASP 17, given the need to develop and deliver projects of scale which will enhance Shannon the Living Town, thereby enhancing the appeal of Shannon Airport and Shannon Free Zone as investment locations in the process.

Helen Downes, Chief Executive

Submitted on behalf of the Board and Membership of Shannon Chamber

