



Submission NO. 140

# LAND PLANNING & DESIGN

## Submission on Clare Development Plan 2022-2028 Issues Paper

*On behalf of*

**Shannon Group**

**CUNNANE STRATTON REYNOLDS**  
LAND PLANNING & DESIGN

Date: November 2020

*Submission  
by  
Cunnane Stratton Reynolds*

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## 1.0 Introduction

Cunnane Stratton Reynolds have been appointed by Shannon Group, Shannon Airport, Co Clare, Ireland, to make this submission on the Issues Paper in respect of the Clare Development Plan 2022-2028 which is currently subject to public consultation until 16<sup>th</sup> November 2020. Shannon Group welcome the opportunity to engage in the plan making process and would be happy to discuss the contents of this submission further with Clare County Council.

In accordance with section 11(2) (bc) of the Planning and Development Act 2000 (as amended), this submission focuses on strategic issues affecting the future sustainable development of Clare.

Shannon Group is a commercial semi-state company, formally established in September 2014. The group is comprised of:

- Shannon Commercial Properties
- Shannon Airport Authority
- Shannon Heritage
- The International Aviation Services Centre (IASC)

These businesses operate and manage Shannon Airport, the commercial property portfolio held by Shannon Commercial Properties, numerous tourist attractions operated by Shannon Heritage and the development of the aviation cluster at Shannon by IASC.

## 2.0 Shannon Group

As indicated above Shannon is comprised of:

- Shannon Commercial Properties
- Shannon Airport
- Shannon Heritage and
- The International Aviation Services Centre (IASC)

Shannon Group has single mission to build *“sustainable livelihoods and a vibrant economy for our people, our regions, and our country by shaping opportunities in aviation, property and tourism”*.

They have an integral role in economic investment and development regionally and nationally through a significant property and land portfolio and infrastructure assets. Cumulatively, it is estimated that Shannon Group generate €3.6 billion in GVA each year and supports over 46,000 jobs.

Shannon Group are continuously driving economic growth through its aviation, property and tourism businesses and are therefore a key stakeholder in the emerging Clare County Development Plan. The intention of this submission is to set out Shannon Groups vision for the sustainable development of Clare over the period of the emerging development plan and beyond.

Given the diversity of operations within Shannon Group across aviation, property and tourism, this submission seeks to cover a wide range of issues. In the interest of clarity this submission will respond to the broad themes that have been covered within the Issues Paper published by Clare County Council. This submission seeks

to respond to questions included in the Issues Paper which are of particular relevance to our clients' interests.

#### *Shannon Commercial Properties*

Shannon Commercial Properties owns and manages seven business and technology parks that attract industry to the region. The Shannon Free Zone is the largest multi sector business park outside of Dublin. There are 160 companies employing over 7,500 in the Shannon Free Zone. The Shannon Free Zone has been extensively redeveloped and renewed in recent years to meet occupier requirements with further projects planned.

The ability of Shannon Commercial Properties to offer a variety of good value property solutions including, office space and incubation space will ensure that it will continue to play a key role in the economic development of the Mid-West. Due to the success of its initial investment program, Shannon Commercial Properties is now planning the next phase of a wider redevelopment programme.

#### *Shannon Airport Authority*

Shannon Airport Authority is responsible for the management, operation, and development of Shannon Airport. Shannon Airport is a strategic national asset and has played a key role in the economic development of Shannon and the Mid-West. Open 24 hours a day throughout the year, the airport operates with no curfews, slots or noise restrictions and has the longest runway in the State. The Airport is strategically located in the heart of the mid-west and serves a catchment area which extends northwards to Galway and beyond and southwards to Cork and Kerry. The expansion of the motorway network throughout the West and Midlands has enabled the airport to extend its appeal as the primary access point or gateway for this region. Shannon is, therefore, the principal long-haul airport for this broader region and is a vital economic driver for FDI, indigenous industry, and inbound tourism. A recent independent Economic Impact Report on Shannon Group, conducted by W2 Consulting, confirmed that FDI, indigenous industry and tourism in the West of Ireland are heavily reliant on the connectivity provided by Shannon Airport.

#### *Shannon Heritage*

Shannon Heritage is recognised as one of Ireland's largest visitor experiences, including 8-day visitor attractions and 4 evening entertainment programmes in Clare, Limerick, Galway, and Dublin. The Shannon Heritage portfolio has grown over the years and began in 1963 with the operation of its first medieval banquet at Bunratty Castle in Co. Clare. The major success of this attraction led to the rapid expansion of the visitor portfolio. Over 300 people are employed by Shannon Heritage in the peak tourist season. Shannon Heritage are planning significant rejuvenation and expansion investment at Bunratty over the next few years which when implemented will result in a doubling of visitor numbers to the attraction to over 900,000 annually.

#### *The International Aviation Services Centre*

IASC, the International Aviation Services Centre is tasked with developing a global aviation and aerospace industry cluster in Shannon. IASC helps existing aerospace firms located in the Mid-West develop their business and works alongside IDA Ireland and Enterprise Ireland as they seek to bring new companies to the area. The

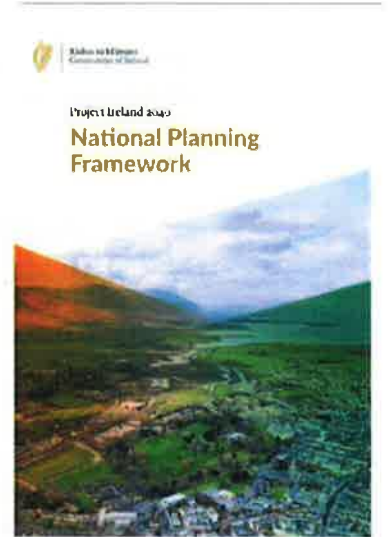
region around Shannon is recognised as Ireland's aerospace heartland supported by local universities offering aviation-specific training and research facilities.

### 3.0 Planning Policy Context

#### 3.1 The National Planning Framework (NPF) – Project Ireland 2040

The NPF is the Government's high level strategic plan for shaping the growth and development of the country to 2040. There is a clear focus on more balanced regional growth with 75% of the growth to be targeted outside of Dublin and its suburbs signalling a shift towards Ireland's regions and cities other than Dublin.

The NPF projects that the population of the Southern Region will increase by between 340,000 and 380,000 people with an additional 225,000 in employment. The NPF notes that future growth in the Limerick Shannon region will be based on leveraging national and international connectivity, higher education capacity and quality of life to secure strategic investment. **This must be underpinned by sustainable employment and housing development, focused on the broader Limerick-Shannon Metropolitan Area** and a strengthening of the urban cores of the county towns and principal settlements, as well as in rural areas.



The following NPF policy objectives are of particular note in the context of this submission:

NPO 3a - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

NPO 4 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

NPO5 - Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment, and prosperity.

NPO6 - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

NPO9 - In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- Agreement (regional assembly, metropolitan area and/or local authority as appropriate).
- Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that

the totality of planned population growth has to be in line with the overall growth target.; and

- A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services.

NPO 27 - Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

The NPF emphasises the role of placemaking in economic prosperity as city regions are now the focal point for investment and seeks to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

### **3.2 The National Development Plan (NDP) 2018-2027**

The National Development Plan will drive Ireland's long term economic, environmental and social progress across all parts of the country to 2027. The following investment projects included within the NDP are noted:

- Enhanced regional accessibility - Establish the Atlantic Corridor road network linking Cork, Limerick, Galway, and Sligo; M20 Cork to Limerick;
- Strengthened rural economies and communities – town and village renewal schemes; Fáilte Ireland tourism investment projects, greenways strategy;
- Sustainable mobility – BusConnects;
- Strong economy, supported by enterprise, innovation, and skills - New Regional Sectoral Clusters to scale and internationalise enterprise in all regions; Disruptive Technologies Innovation Fund;
- High quality international connectivity – support for Shannon Airport as key tourism and business gateways for the regions;
- Enhanced amenity and heritage – significant investment to provide better access to historic, built, and natural environment.
- Transition to a Low-Carbon and Climate Resilient Society – BusConnects; Sustainable travel measures, including comprehensive Cycling and Walking Network for metropolitan areas of Ireland's cities, and expanded Greenways; At least 500,000 electric vehicles on the road by 2030 with additional charging infrastructure to cater for planned growth

The delivery of the above projects as identified within the National Development Plan are considered to be important in the context of this submission and should we submit be facilitated and support in the emerging Clare Development Plan 2022-2028.

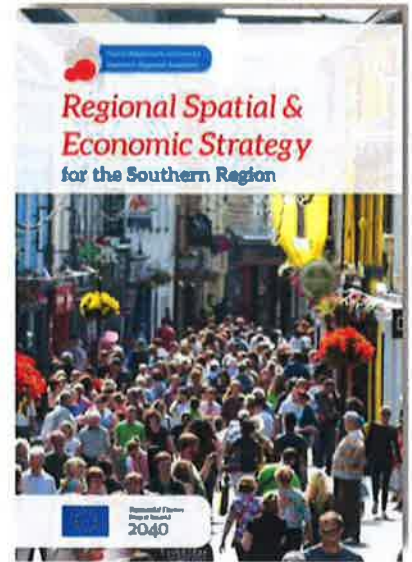


### 3.3 The Regional Spatial and Economic Strategy for the Southern Region (RSES)

The RSES identifies the high-level requirements and policies of the Southern Region. It sets out the framework for the Local Authorities and relevant stakeholders to implement the NPF within the context of the RSES. Specifically, the RSES includes a Metropolitan Area Strategic Plan (MASP) that provides a focus on Limerick City and the metropolitan settlement of Shannon.

The Regional policies of the RSES align to the NPF and seek to achieve 10 stated strategic outcomes including:

1. Compact growth
2. Enhanced regional accessibility
3. Strengthened rural economies and communities
4. Sustainable mobility
5. A strong economy supported by enterprise, innovation, and skills
6. High quality international connectivity
7. Enhanced culture, amenity, and heritage
8. Transition to a low carbon and climate resilient society
9. Sustainable management of water, waste, and other environmental resources
10. Access to quality childcare, education, and health services



### 3.4 Limerick Shannon Metropolitan Area Strategic Plan (MASP)

The vision statement for the MASP is *“to create a sustainable, inclusive, smart, climate and economic resilient Limerick Shannon Metropolitan Area, which is competitive and of a scale which can exert critical mass leverage at an international level, maximising the economic, social, cultural and environmental opportunities in a manner for all those who live, work and visit the Metropolitan Area, Mid-West Region and for the benefit of the country”*.

The future growth and ambition for each MASP is based on the principles of Sustainable Place Framework. For the development of the Limerick Shannon MASP, the following guiding principles apply:

- A living city and Metropolitan Area
- Limerick Shannon as a global gateway
- Compact sustainable growth
- Integrated transport and land use
- Accelerate housing delivery
- Employment density in the right places
- Social regeneration
- Future development areas
- Metropolitan scale amenities
- Enabling infrastructure
- Coordination and active land management

The MASP identifies significant opportunity for Shannon to expand as a globally recognised centre of excellence for software engineering/ aviation/ logistics talent.

The MASP recognises and supports Shannon as a centre for research and development for autonomous vehicles that will complement its role as a world leader in aviation and a centre for manufacturing, engineering, and distribution.

MASP policy objective 3 relates:

*“a. The Limerick Shannon MASP recognises Shannon 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, aerospace, engineering, manufacturing, and distribution.*

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

*c. It is an objective to improve and enhance Shannon as an attractive residential location through placemaking and regeneration initiatives”.*

#### **4.0 Vision for County Clare**

The current vision for Clare in the 2017 County Development Plan is as follows:

*“A county that has maximised 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”.*

Shannon Group are generally supportive of the current vision for the County. However, it needs to be updated in the forthcoming plan in recognition of the role of the Limerick Shannon Metropolitan Area Strategic Plan (MASP) in the national and regional policy context.

The County Development Plan is required to set out a strategy for the growth and development of the county which is consistent with the national and regional planning policy context. The policy context has changed significantly since the adoption of the current plan with the publication of Project Ireland 2040 National Planning Framework (NPF) in 2018 and the Regional Spatial and Economic Strategy for the Southern Region (RSES) in 2020

The NPF recognises the growth potential of the MASP area with its existing third level institutes and international airport and port facilities. The aims of national and regional planning policies are to build on these strengths while improving liveability through key growth enablers. The MASP is to become an international location of scale and a primary driver of economic and population growth in the Southern Region.

Having regard to the above, the vision for the new plan needs to be ambitious and should be underpinned by the role of Shannon Airport as an international gateway and position Shannon as a hub of education and innovation for the developing and emerging sectors located there including aviation, CAV and MedTech.



## 5.0 Population and Housing

Shannon is a new town having been planned and developed in the 1960s as part of a house building programme to provide accommodation for workers in Shannon Airport and the developing Shannon Free Zone. In 1962 An Outline Development Plan was ready for the new town and based on a short-term population target of 6,000 architects Downes, Meades & Robinson in association with a town planner Frederick Rogerson drew up a master plan for the town.

The long-term population projections for the town were envisaged to be in the region of 25,000-35,000. A reappraisal of the development plan in 1972 by Shephard Fidler acknowledged that the projected figures were unlikely to be realised but even then, thought that Shannon was capable of growing to 50,000 by the year 2000.

But despite a substantial and thriving daytime employee population, the resident population of the town has not grown to the extent envisaged in the original town plans. The National Spatial Strategy (NSS) published in 2002 sought to achieve a better balance of regional development across the country to counterbalance the growth of the Greater Dublin Area. It identified nine gateways and twelve hubs for growth. Gateways have a strategic location, nationally and relative to their surroundings and provide national scale social, economic infrastructure and support services and further development of the gateways which included Limerick/ Shannon was a key component of the NSS.

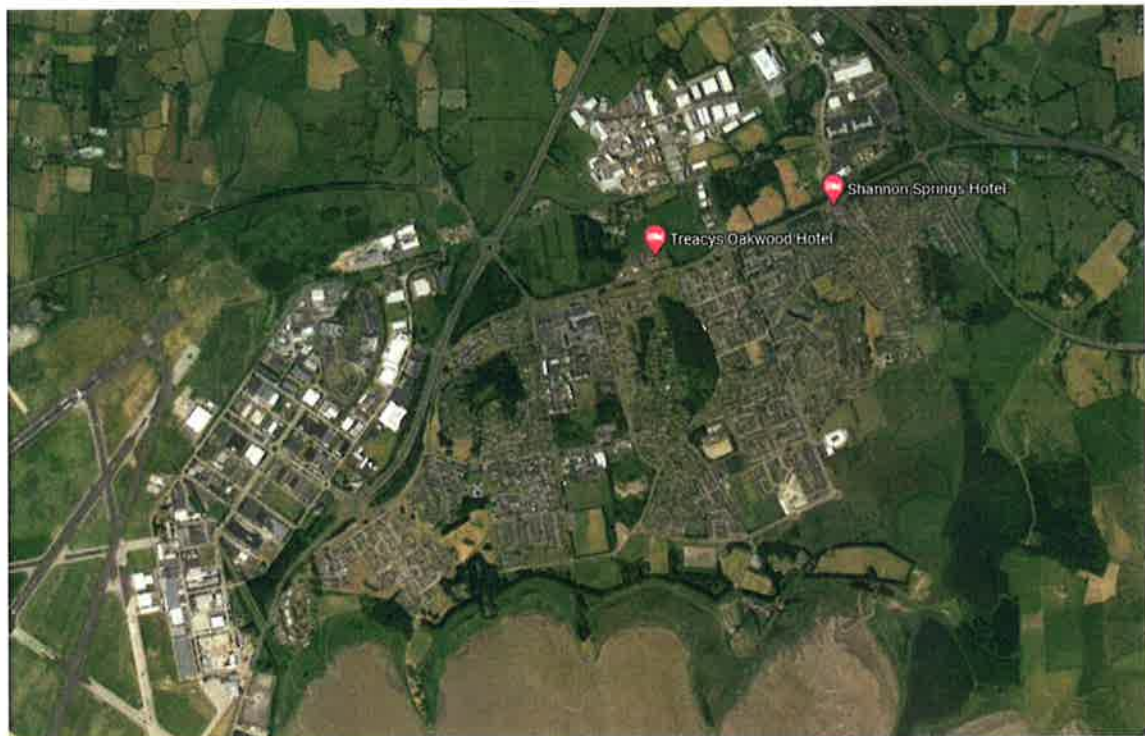
There were several failures of the NSS. The 2010 NSS Update and Outlook Report examined some of these. For example, it noted that while population growth in some gateways and hubs had underperformed, smaller towns, villages and rural areas within a 50-80km commuting range of major cities and towns experienced significant population growth and that development had become more dispersed and fragmented geographically with greater distances between where people live and work resulting in urban sprawl and an over dependence on the private car.

While Shannon has grown from strength to strength economically over the last number of years, the population has remained stagnant and residential development within the town has been very limited. A comparison of the below maps shows the limited amount of residential growth that has occurred over the twenty-year period 2000-2020.

**Figure 1** 2000 Ordnance Survey Map of Shannon



**Figure 2** 2020 Current Google Maps Image



In recognition of its gateway status, the Shannon Local Area Plan 2012 had a population target of 11,972 for Shannon in 2017. This would have required a population increase of 2,750 between 2006 and 2017. The current Clare Core Strategy sets a target population of 12,931 for Shannon by 2023. This would be an increase of 3,258 (or 34%) over the 2011 population.

The population of Shannon in the 2016 Census was 9,729 people, well below the projected population target for 2017. This was a very minor increase in population of 56 persons or 0.6% from the 2011 Census, and 507 persons or 5.5% from the 2006 Census.

The Census population figures confirm that Shannon has been consistently underperforming in population growth and therefore not fulfilling its role as a strategic gateway location. A review of Census statistics information (Table 1 sample review) indicates that the population increased in a number of the lower tier settlements, smaller towns and larger villages, in County Clare between 2011 and 2016 while the population in Ennis declined and growth in Shannon was minimal.

The stagnating resident population figure in is in stark contrast to the daytime working population in Shannon of approximately 18,000, the vast majority of which choose to live in the Shannon hinterland, Ennis, and Limerick. The interdependence of Shannon Town residential areas and the employment areas of Shannon Free Zone and the airport is highlighted in the RSES and the real challenge now is to reinvent the image of Shannon and transform it into a vibrant and dynamic place to live and work.

**Table 1** Census 2011 and 2016 Comparison – sample review of Clare Settlements

Settlement	Settlement Hierarchy	Population Census 2011	Population Census 2016	Population Change
Ennis (County Town Hub)	County Town Hub	25,360	25,276	-84
<b>Shannon (Linked Gateway)</b>	<b>Linked Gateway</b>	<b>9,673</b>	<b>9729</b>	<b>56 (0.6%)</b>
<b>Services Towns</b>				
Kilrush	Service Town	2,695	2,719	24 (0.9%)
Ennistymon	Service Town	957,	1,045,	88 (9.2%)
Lahinch	Service Town	642	638	-4
Scarriff-Tuamgraney	Service Town	816	770	-46
<b>Small Towns</b>				
Killaloe	Small Town	1,292	1,484	192 (14.9%)
Sixmilebridge	Small Town	2,507	2,625	118 (4.7%)
Tulla	Small Town	662	661	-1
Newmarket on Fergus	Small Town	1,773	1,784	11(0.6%)
Miltown Malbay	Small Town	777	829	52 (6.7%)
Lisdoonvarna	Small Town	739	829	90 (12%)
Kilkee	Small Town	1,139	972	-167

The NPF prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. Ireland's future homes should be located in places that can support sustainable development; be delivered in our cities and larger towns (where large scale housing demand exists) and still be located in our smaller towns, villages and rural areas, including the countryside, but at an appropriate scale.

The RSES has allocated that the population of Shannon town will grow by at least 30% by 2040. In accordance with NPF policy NPO 3c there is a need to deliver at least 30% of all new housing within existing urban footprints and therefore it is a key objective of the RSES to improve and enhance Shannon as an attractive residential location through placemaking and regeneration initiatives.

MASP Objective 10 relates *"It is an objective to enhance Shannon Town as an attractive residential centre through regeneration, active land management initiatives and the redevelopment of Shannon Town Centre. An Action Area Plan for Shannon Town Centre and required environmental assessments including SEA and AA will be prepared within 3 years of the publication of this RSES and MASP"*.

It is also noted that consideration should be given to initiatives to encourage the regeneration of existing residential areas.

The Local Authority will be preparing a Housing Need Demand Assessment (HNDA) as required by the NPF to correlate and accurately align future housing requirements. This will be used to inform housing policies, housing strategies and associated land use zoning policies as well as assisting in determining where new policy areas or investment programmes are to be developed. It is submitted that in accordance with NPF guidance jobs led growth should be a key aspect of this assessment and Shannon Group would be happy to discuss their future development plans with the Local Authority to help inform the assessment.

Having regard to the acute issues surrounding population and housing, Shannon Group make the following submissions:

- **A significant proportion of the county's future population growth will need to be allocated to the MASP area.**
- **The national targets for population growth in Shannon are ambitious in the context of the current town housing market and the population growth to date. This is a significant challenge that needs to be addressed in the emerging development plan Core Strategy. The plan must be consistent with and fundamentally linked to national and regional planning strategies, guidelines and policies including national and regional population targets.**
- **Shannon Group fully support the population target for Shannon town set out in national and regional planning policies and submit that the additional 30% should be an absolute minimum requirement in the emerging Core Strategy to address the years of housing undersupply and to help achieve critical mass to fulfil Shannon's role as a strategic gateway.**
- **The Local Authority must undertake a leadership role to progress and secure the population targets for Shannon. The Local Authority must**



ensure that sufficient land is zoned to cater for the projected population increase and a suitable policy response must be implemented to address infrastructural deficits and market reasons where existing zoned sites are not coming forward for residential development.

- The availability of high-quality affordable accommodation to suit all types of households is critical to attracting and retaining a diverse workforce. This is especially relevant when competing in an international market for the specialised skills that are required for the emerging innovative jobs at Shannon Free Zone. The emerging plan needs to facilitate a greater alignment between where people work and live.
- Residential development in Shannon has not kept pace with economic development and there has been a significant lack of investment and development in the town centre. This has resulted in a large proportion of employees of Shannon settling elsewhere and commuting to the town for work only.
- The emerging development plan must address the critical shortage of high-quality housing or the town centre and infrastructure will continue to decline, and economic development will be hindered. A critical mass of population is required to sustain and improve the infrastructure, services and facilities that will allow Shannon to grow in a sustainable manner.
- In accordance with the NPF, it is submitted that residential development should be prioritised on sites within the town that are or can be readily serviced and can access employment areas on foot or using public transport. These types of sites would also be suitable for increased residential densities to meet national requirements.
- It is recognised that effective placemaking is instrumental in the development of sustainable communities and the role that placemaking can perform in driving population growth in Shannon is discussed further within this submission.

## 6.0 Economic, Enterprise and Tourism Development

### 6.1 *Economic and Enterprise Development*

This submission seeks to address the following questions in relation to economic development contained within the Issues Paper:

- *How can we facilitate economic recovery post Covid-19?*
- *How can Shannon as part of the Limerick-Shannon Metropolitan Area continue to develop as the key driver of economic growth in County Clare and within the region?*
- *How can we promote inward investment and job creation in the County and where should it be located?*

As noted within the Issues Paper, Shannon is an engine of economic growth as a centre of international business, aviation, aerospace, and emerging sectors such as

connected and automated vehicles and life sciences. The specific roles of Shannon airport, industrial park and tourism are referenced.

Shannon's direct air connectivity to the UK, Europe and America and its strategic location with convenient access to the national road network makes it very attractive for foreign investors and tourism. Shannon Airport will continue to be instrumental in the attraction of FDI to the western region and nationally as part of Ireland's economic recovery.

In terms of business aviation, Shannon Airport is the number one transit stop in Europe for corporate business jets routing from Europe to North America and back. This has the potential for further development of Fixed Based Operators (FBOs) who handle and service such aircraft and would enhance future growth in airport business. Premium sporting events, such as the holding of the Ryder Cup in Adare in 2027 will further enhance this prospect.

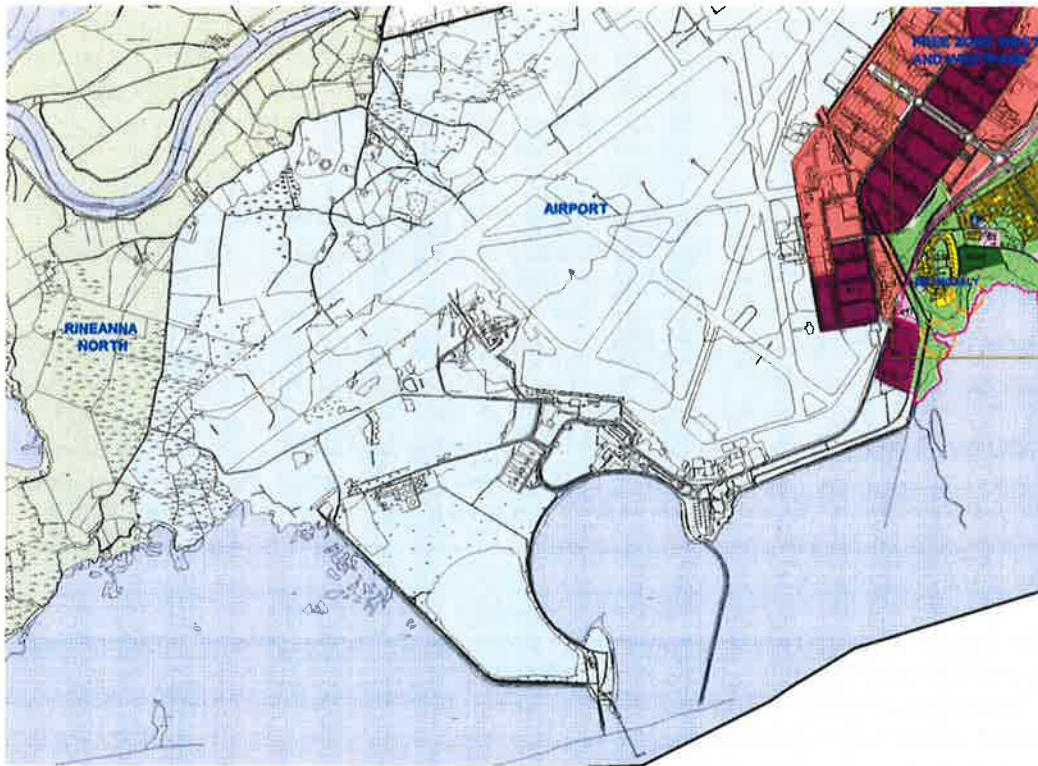
In 2019, Shannon Group built a large aircraft hangar at Shannon Airport. This was the first hangar built in the State in 20 years. Further sites have been identified for the development of additional hangars. Maintenance, Repair & Overhaul (MRO) activity is a significant part of Shannon Airport's business model and has significant growth potential. Notwithstanding the requirement for new access roads, it should be noted that the cost of a hangar development project is considerable.

Cargo is also an integral part of the modern airport operation. During the early period of the Covid pandemic, Shannon Airport was active in supporting and facilitating the delivery of key PPE equipment into the State. This further highlights the importance of an efficient cargo operation. There is the potential for the growth and development of warehouse facilities. Such facilities could also support the supply of additional FDI into the region.

The existing Shannon Airport and adjacent lands are currently zoned as 'Airport'. The Development plan states that *"land zoned for airport development shall be used for airport-related uses, buildings, infrastructure and services and compatible aviation-related businesses and industries"*. It is requested that the forthcoming development plan supports in principle the potential future development of a cargo hub at Shannon Airport.



**Figure 3** Potential for future cargo hub in lands at Shannon Airport



There has been significant activity in the Shannon Free Zone over the past number of years as Shannon Commercial Properties seeks to reinvent the area to create a high tech eco system through a phased programme of redevelopment and renewal to meet the needs of modern business. Shannon Free Zone has seen huge growth in internationally traded services from financial and insurance to software and telecoms services, and customer contact centers. International companies use Shannon to serve markets in Europe, the Middle East, Africa, Asia, Japan, and the Pacific Rim.

While Shannon Free Zone had a building vacancy rate of approximately 45% four/ five years ago, it is now at 98% occupancy with limited options for potential new occupants. Shannon Commercial Properties has completed the first phase of an ambitious investment programme that has been driving inward investment to the region and now need to fast track the next phase in the regeneration of the Free Zone to cater for demand.

As emphasised in the RSES the diversification of industry and the development of clusters increase economic resilience. The International Aviation Services Centre (IASC) located in Shannon Free Zone is recognised as a very good example of clustering within the Limerick Shannon MASP.

RSES MASP objective 11 states that *"it is an objective to develop, deepen and enhance the economic resilience of the Limerick Shannon Metropolitan Area through creating a vibrant and diversified economic base, with strong healthy connected clusters drawing on Eolas Comhroinnte Obair le Cheile/ Shard Knowledge Working Together (ECOLC/SKWT) to assist in bringing disruptive technologies and innovations to national and global markets"*.

Having regard to increasing diversification across industries, emerging employment sectors and the need to respond to market demand, the zoning objectives within the emerging development plan must be sufficient flexible. In the interests of encouraging a dynamic economy in Shannon and in the County generally, it would be important not to limit or restrict the types of employment uses that can be provided, and instead prospective applicants will be required to justify their proposals in planning applications.

The need for flexibility is particularly relevant to business and technology parks in the County, some of which have very restrictive existing zonings. For example, policy objective OP15 for the Clare Technology park.

The existing and emerging employment sectors in Shannon can play a major role in economic recovery post COVID 19. One such sector is R&D for autonomous vehicles. Shannon has the potential to be at the forefront of the global mobility revolution. The Future Mobility Campus Ireland was established to create and deliver future mobility testbed facilities for stimulating research, development, and innovation in the area of Autonomous Connected Electric Shared Vehicles (ACES), including Connected and Autonomous Vehicles (CAV) in Ireland. The testbed will be located at Shannon Free Zone.

The target users/customers of this facility include national and international automotive and technology providers that are interested in testing their innovations in real-world settings before the product release phase. Future Mobility Campus Ireland will be a catalyst attracting new innovations including start-ups and SME's in the region, opening new opportunities for growth in addition to spill over economic impacts.

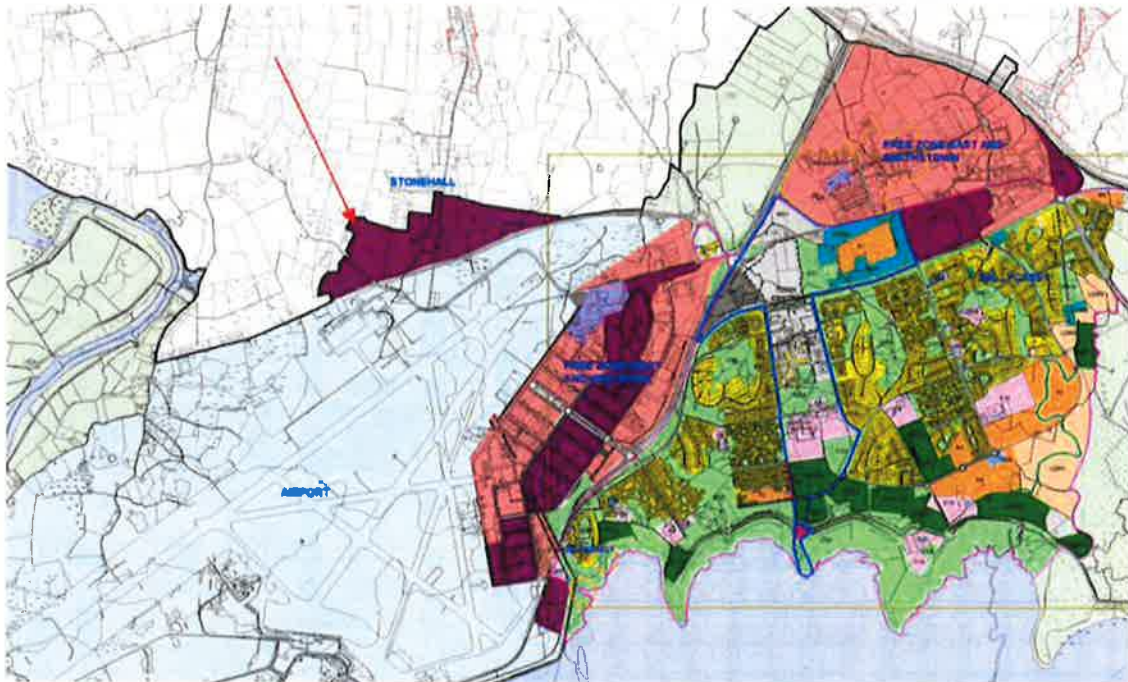
A planned Unmanned Ariel Vehicle (UAV) testbed expansion in Shannon will also provide a dedicated space for research, development, innovation, and product testing for indigenous and international UAV companies.

In determining where future jobs should be located, the NPF targets urban growth that is population and employment led in recognition of the fact that firms and enterprise development are drawn to urban locations by market forces such as agglomeration, migration and specialisation that depend on factors such as scale, accessibility, innovation supported by higher education institutions and quality of life. In planning for strategic employment growth, the NPF advocates consideration of the following factors:

- *Current employment location, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises;*
- *Locations for expansion of existing enterprises;*
- *Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/ customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability;*
- *Locations for potential relocation of enterprises that may be better suited to alternative locations and where such a move, if facilitated, would release urban land for more efficient purposes that would be of benefit to the regeneration and development of the urban area as a whole, particularly in metropolitan areas and large towns.*

In addition to the above considerations, we would add that the Local Authority must ensure that lands that are zoned for employment have the necessary enabling infrastructure in place to service future economic development including roads infrastructure, electricity and water services. For example, services need to be extended to enable the development of land to the North West of Shannon Town.

*Figure 4 Employment lands to the North West of Shannon Town*



Shannon Group have the following observations and submissions on economic and enterprise development policy within the draft development plan:

- **The emerging plan must maintain support for the sustainable development and expansion of Shannon Free Zone as a strategic employment location.**
- **In accordance with RSES, the development plan should allow for flexibility to accommodate future growth opportunities that emerge during the lifetime of the plan. For example, a more progressive adaptable approach to land use zoning that allows for flexibility in the types of uses that can be accommodated within industrial and enterprise zones to facilitate employment opportunities that do not exist yet.**
- **The projected increase in population will require that sufficient zoned lands in appropriate sustainable accessible locations are available to support the economic growth associated with this population increase. It is submitted that the forthcoming Development Plan should ensure that there is an excellent supply of zoned and serviced or serviceable employment land available in Shannon for the period of the development plan and beyond having regard to the timeframes of the RSES and NPF.**

- **Having regard to the NPF and RSES policies and objectives, it is submitted that the focus should be on maintaining existing zonings that facilitate and support enterprise and employment development and consolidating and expanding these zonings where necessary.**
- **While this submission focuses on strategic issues, the Local Authority should consider the rezoning of undeveloped sites that are contiguous to existing employment zones for the expansion of employment uses. This might include sites within Shannon Town.**
- **The Development Plan should include planning policy objectives that support the role of Shannon in transforming mobility globally and the development of mobility as a service with specific support for the development and expansion of the Future Mobility Campus.**
- **Having regard to the range of industries that are required to provide expertise in the research and development of emerging sectors in Shannon – the aviation, MedTech and autonomous connected electric shared vehicles (ACES) and connected and autonomous vehicles (CAV) sectors the development plan should include a strategic objective for the designation of Shannon as an innovation and education hub in conjunction with the Universities, Institutes of Technologies and educational providers that are an instrumental asset in supporting our innovation potential.**
- **Economic development and the attraction of talent is bolstered by other factors raised within this submission including accessibility and connectivity (road network and public transport), access to affordable high-quality accommodation and a good quality of living (investment in Shannon Town). These are key issues that need to be addressed in Shannon to support its economic role.**

## **6.2 Tourism Development**

County Clare has an abundance of tourism resources, including natural and cultural attractions, vibrant towns and villages and contrasting landscapes. Shannon Heritage operates the following tourism assets in County Clare – Bunratty Castle; Craggaunowen, and Knappogue Castle as well as operating the Gift Store at the Cliff of Moher

As noted, Shannon Heritage has significant plans for the enhancement and expansion of Bunratty Castle and Folk Park. The team there with the support of Shannon Group have submitted an application to Fáilte Ireland under the Platforms for Growth Capital Grant Scheme. This €40 million development will see the addition of two immersive cultural and historic shows to the North part of the Folk Park & Bunratty Castle and all farmhouses will receive enhanced interpretation through multi-lingual audio guides, live storytelling and the use of state of the art technology that will always remain sympathetic to the heritage of the park.

One of the key aims of this project is to ensure a step change in visitor numbers in the shoulder season and this will be achieved by offering visitors new weather proofed shows, by developing tourism clusters in Clare and Limerick and by once again being first to market with world class tourism experiences. Shannon Heritage is also a leading national provider of seasonal family events with for e.g. the Bunratty Christmas Experience welcoming 35,000 visitors annually, another significant



economic driver to the region. Shannon Heritage very much welcomes the plans to develop a greenway from Shannon to Bunratty and onwards to Sixmilebridge. Shannon Heritage will support this by offering bicycle repair hubs in the public car park.

### ***Current Tourism Policy Context***

The current development plan includes as one of its main goals *“A County Clare in which tourism growth continues to play a major role in the future development of the County, adapting to the challenges of competing markets by maximising the development of a high quality, diverse tourist product”*.

The development plan tourism policies are based on a number of strategic aims including:

- Maximising the potential of tourism as a ‘pillar of economic growth’ thereby contributing to the balanced economic development of the County and the tourism industry of the region;
- To work in partnership with Fáilte Ireland, Clare Tourism Forum and other agencies to define the tourist experience and to develop a clear tourism identity for County Clare;
- To develop and enhance new and existing tourism products, attractions, and tourism infrastructure;
- To capitalise on the distinct tourist attractions that County Clare has to offer including natural, built and cultural heritage, scenic landscapes and natural amenities;
- To develop strong, year-round, high-quality integrated tourism products;
- To increase the length of tourist stay and ‘yield per visitor’ in the County;

The current plan recognises the importance of developing the promotion and branding of County Clare as a tourist destination to attract visitors from the different consumer categories defined by the Tourism Agencies – *Social Energisers, Culturally Curious and Great Escapers*. The current policy also seeks to maximise integration of the tourism product including the creation of linkages between tourism activities and business in key areas and to improve physical and intellectual connectivity to those areas that are difficult to access.

The Shannon LAP seeks to capitalise on the regions assets and develop Shannon Town as a visitor destination. Tourist related retail development is recognised as a potential niche sector to be developed within the town. The LAP includes several objectives that seek to develop an attractive centre with a distinctive shopping character and formalise, enhance, and promote walks within Shannon town.

In having regard to the need to create a stronger link between the town and its estuary setting the LAP includes a specific objective for tourism related development at Illaunagowan Point.

The RSES sets out a number of objectives that seek to enhance tourism and leisure amenities in the region. Importantly, the RSES notes that the promotion of enhanced transport networks including public transport services is essential to attract and enable ease of movement around the region by tourists and visitors. It is noted that improvements are needed at arrival points such as ferry ports with better public transport connections and to the existing road and rail networks/ services to remove bottlenecks and improve connectedness to and between key tourism destinations.

The identification of strategic corridors will assist in the development of the network between cities, towns, and rural areas.

The improvement of the transport network including public transport is especially relevant in the context of the development of tourism in County Clare.

The 2016 Failte Ireland strategy for tourism investment *Tourism Development and Innovation* recognises that a flourishing tourism industry is vital for Ireland's economic wellbeing and recovery and that it shapes our image and attractiveness as a great place to live, work and invest. The strategy aims to tap into the huge potential within the sector.

The sustainable and successful development of the tourism sector is essential to the economy of Clare and the wider region and can perform a role in economic recovery within the region. The vision of the recently published Clare Tourism Strategy 2030 is that Clare will be a "*globally renowned, sustainable and vibrant destination that is easily reached and traversed, and recognised for its rich cultural assets, its stunning and open landscapes, its compelling array of remarkable experiences and for its welcome and exceptional hospitality*".

The COVID-19 pandemic has resulted in unprecedented impacts on the Irish tourism sector with a sudden drop in international visitors. In addition, the tourism and hospitality sector has been further devastated by Government restrictions which have resulted in the closure of businesses and facilities and curtailed the movement of people.

The Tourism Recovery Taskforce has prepared a Tourism Recovery Plan that includes a set of recommendations on how best the Irish tourism sector can adapt and recover in the changed tourism environment as a result of the COVID-19 crisis. The plan identifies priority aims, key enablers and market opportunities for the sector for the period 2020-2023.

It is essential to emphasise that a key message within the Tourism Recovery Plan recovery plan is that doing 'more of the same' will not be sufficient. Consumer research across core international markets indicates that consumers in a post COVID-19 environment will require a different type of experience. It is noted that additional investment in product development including in outdoor activities and enabling access and better use of vast open spaces will be necessary. It is recommended that a comprehensive review of Ireland's tourism product needs to be undertaken to identify strengths, gaps, opportunities, and impediments that will inform future investment in the development of the visitor offering.

The recovery plan is also underpinned by the need to promote sustainable tourism in Ireland. The need to achieve sustainable tourism growth is reflected in the Government's existing tourism policy statement – *People, place and Policy: Growing Tourism to 2025* which states "*In 2025, our aim is that we will have a vibrant, attractive tourism sector that makes a significant contribution to employment across the country, is economically, socially and environmentally sustainable, helps promote a positive image of Ireland overseas, and is a sector that people wish to work in*".

The aims and objectives of the Tourism Recovery Plan 2020-2023 and the Clare Tourism Strategy 2030 must be reviewed and incorporated into the forthcoming development plan tourism policy.



The published Issues Paper asks *what could be done to protect, support and enhance the tourism sector?*

The Council have a key role in continuing to grow tourism within County Clare and maximising the development of a high-quality tourism product.

In response to the above Issues Paper question, Shannon Group have the following observations and submissions on tourism development policy within the emerging development plan:

- **While the vision of the current development plan states the role of tourism in County Clare, we submit that the emerging plan should include the protection and development of the tourism sector as a strategic aim of the Core Strategy.**
- **The plan should acknowledge the role of the tourism sector as a key economic driver in the County which supports jobs creation and sustains communities and is therefore essential to economic recovery.**
- **The plan should include specific objectives that support the development of new tourist facilities, infrastructure, and experiences in County Clare with an overarching aim of diversifying the tourism offer of the County and extending the holiday season.**
- **The county development plan tourism policy must be focused on developing and supporting sustainable tourism in accordance with Fáilte Ireland's objective to develop a sustainable tourism sector that protects, enhances and promotes both our natural and built heritage for the common benefit of visitor, industry, community and the environment.**
- **There is a need to foster connections and linkages between existing and proposed tourism areas and assets to build on the establishment of tourism experiences where visitors are offered a complete experience that ultimately encourages longer stays.**
- **There is a fundamental link between tourism and many other sectors which needs to be acknowledged in the draft plan, which should result in an increase in the level of policy cross-compliance and consideration of potential benefits and impacts on tourism in the development of policy.**
- **The tourism sector is particularly dependent on a high-quality road network and good quality public transport. The emerging plan must prioritise the upgrade of the last section of the N19 before Shannon Airport (discussed further in Section 9). This is the first impression for many international visitors entering the country and a high-quality entrance with clear directional signage is essential. This is also the opportunity to encourage more visitors to stop at Shannon Town.**
- **A priority should also be to provide targeted improvements to public transport options for visitors to Shannon. The current bus network is not sufficiently frequent. This is discussed further in Section 9.**

- **Enhanced walking and cycling infrastructure are also important to utilise resources and improve accessibility. The plan should include policies that continue the support for the development of greenways, blueways, walkways and cycle ways across the county to encourage sustainable activity tourism. The development of the West Clare Rail Greenway should be prioritised within the plan.**
- **The plan should include specific objectives to facilitate and support the redevelopment and expansion of Bunratty Castle and Folk Park as a strategic tourism location. The upgrade and improvement of the L3126 is critical to support the projected increase in visitor numbers to Bunratty Castle and Folk Park and should be identified as a strategic roads upgrade within the development plan.**
- **Shannon Group support the development of tourism within Shannon Town and specifically the creation of better connections to Shannon Estuary. Tourism within the town could be effectively linked to other tourist destinations in the county such as Bunratty. The Local Authority should consider the Fáilte Ireland 'Development Guidelines for Tourism Destination Towns' when devising policies to develop tourism within the town.**
- **The development of tourism in Shannon Town will require investment in public services including enhanced connectivity and revitalisation through placemaking etc in support of the tourism product.**

## **7.0 Towns and Villages**

This section of the Issues Paper is focused on the towns and villages at the lower level of the Clare settlement hierarchy. While it is appreciated that these settlements also need attention, as the second largest town in Clare and a strategic gateway there are issues within Shannon town centre that must be addressed as a matter of priority to make it more attractive, vibrant and welcoming for residents, workers and visitors.

As highlighted in the Shannon Town LAP the current issues stem from how the town centre, Shannon Free Zone and the airport have developed inter dependently of each other and linkages between the component areas have weakened over time.

The development of Shannon was based on the Radburn layout which promoted the design of 'towns for the motor age' and separated pedestrians and cars. This has resulted in a spatial arrangement whereby the employment zones are functionally separated from the retail and residential areas by significant roads infrastructure.

The underlying problems with the existing town are the lack of a defined town centre and sense of arrival within the town and poor linkages and permeability within the town centre and between the centre, residential and employment areas. Development in Shannon has been centred around the use of the private car which has resulted in difficulties with wayfinding and a lack of street hierarchy and active frontage due to a dominance of car parking.

**Figure 5** The Skycourt Shopping Centre at the entrance to Shannon Town forms the main centre within the town



Shannon is a new town that lacks the distinctive features, qualities and characteristics associated with traditional Irish towns including historic urban fabric and street patterns. When developing Shannon, a key objective would have been on the movement of vehicles as the town developed around the airport and industry. Unlike any other town in Ireland, Shannon does not have a main street or a defined streetscape and there is a lack of a town focal point to give it a distinctive identity.

The Skycourt shopping centre occupies a central location in the town and although it does not form part of a conventional streetscape it is the first indication that one is within the town centre of Shannon after exiting the N18 or N19. However, the form of development here – a shopping centre including multi storey and surface car parking would typically be located at the edge of towns.

**Figure 6** Extensive car parking at the town entrance and around the Town Square



**Figure 7** Existing connections to Shannon Free Zone are not accessible to all



A number of previous plans have sought to address the issues within Shannon Town Centre including the Shannon Town North Masterplan 2009 and the Shannon Town and Environs LAP 2012 that included a Placemaking Framework setting out a



number of objectives to be implemented over the period of the Local Area Plan. This was seen as the necessary first stage of placemaking in Shannon which could then proceed to further initiatives. The Framework focused on three key areas within the town – 1. The Central Area; 2. The Town Square and 3. The Town Park. The framework set out a number of relevant objectives:

LAP objective 2.1 sought “to increase the appeal of the central areas, the town centre and the town park” and LAP objective 2.2 sought “to increase interaction between the N19, the town, the free zone and the estuary”, while LAP objectives 2.3 and 2.4 sought to improve the sense of place wayfinding of key circulation nodes and routes as indicated below.

**Figure 8** Key Circulation Routes identified in the LAP

**Map 2.2: Key Nodes and Routes Map**



The LAP aimed to facilitate the development of an expanded town centre to provide a new street plaza, high street uses, a restaurant/ café cluster, outlet centre(s), small office units, cinema/theatre, and a major anchor store facility/ outlet or discount centre or retail mall in the northern section of the town centre lands. A key aspect of these aspirations was strong pedestrian and road linkages to the existing town centre.

The Town Park has been upgraded and this is a key facility within the town that provides a high level of amenity and linkages. However, despite the ambitious plans, progress to date on the upgrade and improvement of Shannon Town has been very limited. It is imperative that the emerging plan places a renewed focus on the other key areas of the town.

It is noted that Clare County Council are currently working on a new masterplan for the town. It is envisaged that Shannon Town should provide for a vibrant service offering having regard to its existing and planned demographic profile and population targets, employment in the wider area, the rural hinterland which Shannon Town

serves, the proximity of the town to the major employment locations of Smithstown and Shannon Free Zone and the potential for Shannon Town to become a destination in its own right for people travelling to/from Shannon International Airport.

It is important that one consolidated plan drives the future development of Shannon Town and its environs. The Town Masterplan should not be a standalone document, it must be an integral part of the emerging development plan.

The NPF and RSES have placed a renewed emphasis on the importance of placemaking as a tool in delivering the types of conditions that create sustainable liveable areas that people want to live in or close to.

National and regional planning policy objectives seek the sustainable and infrastructure led regeneration, consolidation, and growth of Shannon Town. The RSES identifies the improvement and enhancement of Shannon Town centre to create a sense of place, upgrade of the public realm and the promotion of redevelopment as a key infrastructural requirement for Shannon.

MASP Policy Objective 21 seeks to *"deliver improvements in the public realm in the Limerick Shannon Metropolitan Area to create more active and vibrant urban centres which are attractive as locations of choice to live, work and visit. Examples of projects which can strengthen placemaking and public realm in the Limerick Shannon Metropolitan Area include but are not confined to:*

- *Improvements and enhancement to Shannon Town Centre to create a sense of place, to upgrade public realm and promote redevelopment.*
- *The enhancement of Shannon the Living Town".*

To fulfil the objectives of the RSES and improve the quality of life of people living, working in and visiting Shannon the emerging Clare Development Plan must prioritise the upgrade and improvement of Shannon Town.

Shannon Group make the following submissions relevant to the development of Shannon Town:

- **A placemaking strategy for Shannon must form part of the emerging plan. Placemaking strategies are important to ensure that towns position themselves as attractive and liveable places for investment, the attraction and retention of skilled talent and as places that offer a high quality of living.**
- **The Shannon Town Masterplan must be integrated as part of the emerging development plan and not just a standalone document.**
- **The Local Authority should prioritise completion of improvements to the pedestrian environment as set out in the Shannon Town and Environs LAP and deliver public realm improvements that facilitate a greater level of safe and convenient walking trips.**
- **The development plan should improve the sense of place and way finding of the key circulation routes identified in the LAP. The R471 and R472 routes must be prioritised to provide pedestrian and cyclist connections to Shannon Free Zone.**



- **The Council should undertake a review of car parking within the town centre and remove spaces where possible. It is suggested that car parking spaces could be repurposed for public benefit e.g. parklets and plazas.**
- **As the expansion of the town centre to the north of An Bothar Mór is likely to occur in the medium to long term of the plan period, the Local Authority should investigate what measures could be implemented in the short term to improve the existing town centre.**

**In response to the COVID-19 pandemic, public realm improvement measures were implemented in towns throughout the County to support businesses and enable people to access town centres safely. These included pedestrian crossings, footpath and cycleway enhancements and widening, pedestrianisation of streets and the conversion of parking spaces to parklets and plazas. Simple measures can have a significantly positive impact on peoples experience of space and subsequently increase dwell time and act as a catalyst for development.**

- **COVID-19 has highlighted and increased the need and demand for good quality walking, cycling, and running routes. The Council must take a lead in the delivery of this infrastructure.**
- **The Plan Review should include policy supports that align with the RSES 10 Minute Towns concept which seeks to create connected communities whereby a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport. The Local Authority should use relevant findings of the 10 Minute Towns Accessibility and Framework Report to inform policies for the development of Shannon Town.**
- **Policies relating to the design of the public realm in the emerging development plan including pedestrianisation and priority measures could be explored.**
- **The placemaking initiatives to be implemented should be intrinsically linked to how Shannon 'brands' itself in order to strengthen the towns identity.**

## **8.0 Transport and Infrastructure**

High quality efficient and reliable transport links and excellent infrastructure are imperative to the operations of Shannon Group and its continued success and development in the future.

Shannon Group are supportive of the proposed Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) which they believe if adopted and implemented will have very positive impacts on the metropolitan area.

A separate submission has been made to the draft LSMATS, but it is considered that the below observations are critical for the Local Authority in the context of transport and infrastructure planning in the region.

## **8.1 Shannon Airport**

Shannon Airport is a strategic national asset and has played a key role in the economic development of Shannon and the Mid-West and the International Aviation Services Centre (IASC) strengthens Shannon's role as a global centre of the aviation industry. A competitive, well-resourced, and well-functioning Shannon Airport is a main principle of the vision for the Limerick Shannon MASP.

The MASP recognises the role of Shannon airport as a national and international driver of economic, social and tourism growth. It is a specific objective of the MASP to develop and enhance the strategic role of the airport and to advocate for a policy environment that supports a regional distribution of air traffic and for a greater regional focus by national agencies.

**The enhancement of connectivity to Shannon Airport such that it can continue to drive economic growth in the Region and Midlands is a priority for the Limerick Shannon MASP and this should be reflected in the emerging Development Plan. The upgrade of the N19, the development of a high-quality public transport network that serves the airport and improved regional connections as discussed below are fundamental to enhancing the airports level of connectivity.**

**Current planning policies support the future provision of a rail link from the Ennis-Limerick line to Shannon Airport. It is noted that the draft LSMATS does not support the provision of an improved sub-urban and metropolitan area rail network, within the lifetime of the Strategy. The lack of Transit Oriented Development (TOD) around the proposed train stations, coupled with a lack of competitive journey times against bus-based proposals resulted in low patronage levels.**

**It is recommended that over the lifetime of the Strategy, the land use distribution be re-examined to achieve the necessary critical mass in the context of rail-based TOD. Plans to progress the development of a rail link to the airport have been put on hold for now. We request that the development plan should include an objective to explore the feasibility of this rail link in the future and in the short term a direct shuttle connection between Shannon Airport and Sixmilebridge train station that coincides with flight times must be prioritised.**

**In November 2020, as part of a COVID-19 associated aviation aid package, the Government recommended that a study should be undertaken to assess the potential for a rail link from Shannon Airport and Shannon town to the Dublin-Limerick rail link. We await the outcome of this study.**

## **8.2 Public Transport within Shannon**

The public transport requirements for Shannon Town, Shannon Free Zone and Airport must be considered as one interconnected network. As a metropolitan town of international importance Shannon must be fully accessible and connected for residents, workers, and visitors.

The employment base at Shannon Free Zone and Airport (equivalent in size to a large town) and commercial activities at these locations must be supported by a high standard of transport infrastructure. Shannon Group are committed to improving

sustainable transport options for their large work force at Shannon. But ultimately the decision of employees to use more sustainable commuting options is dependent on the quality of existing services and infrastructure serving these employment areas and therefore not fully within Shannon's Group control.

The current 343 route that serves Limerick, Shannon and Ennis is not frequent enough within Shannon with some bus stops in the town only being served three times daily Monday to Friday and Shannon Airport having an hourly frequency. This is not sufficient for a town with an international airport and world-renowned employment zone and is undoubtedly having a negative impact on Shannon Town Centre.

We submit that Shannon should be served by its own high frequency bus service that also extends to Bunratty as a main tourist destination.

### **8.3 Regional Bus Transport**

Significant improvements to the regional bus service serving Shannon as envisaged in the draft Limerick Shannon Transport Strategy should be prioritised to provide an efficient, reliable, and frequent bus service within the region. The Shannon to Limerick city route and Shannon to Ennis routes need to be enhanced given the substantial level of daily commuting from these areas to Shannon. The existing Route 51 that provides a connection between Cork and Galway serving Shannon Airport is essential in supporting public transport use at Shannon Airport and this route should be supported and enhanced to maintain a frequent and high quality service for this route.

Shannon Group would encourage the Local Authority to work with the NTA to formulate specific objectives which facilitate the introduction of direct bus services between Shannon and Galway that coincide with flight times at Shannon Airport, which would in effect add to the current service offering, creating an incentive to use public transport to and from the Airport.

### **8.4 Roads**

The road network within the Shannon-Limerick Metropolitan area plays a key role within its overall transport system and in its economic, social, and physical development.

The draft LSMATS includes specific objectives for the protection of the strategic function of the national road network serving the region and the progression of key national roads infrastructure including the Limerick to Cork improvement scheme and upgrades to the N19/N19 to address congestion. These objectives are welcomed and fully supported. However, Shannon Group submit that there should be specific policy objectives for the following road infrastructure priority projects:

- **The upgrade of the N19 access road to Shannon Airport (from Drumgeely roundabout to Knockbeagh Point roundabout) must be prioritised to improve the appearance and safety issues on this section of the N19 and to facilitate the strategic future development of Shannon Airport. It is noted that design work on this route is ongoing. The upgrade should be delivered as soon as possible once the design phase and statutory processes are complete.**

- In accordance with the National Spatial Planning and National Roads Guidelines, Planning Authorities may identify stretches of national road within their administrative areas where a less restrictive approach to future access to the national road may be applied. It is requested that the emerging development plan should apply a less restrictive policy approach to future developments that would be accessed off the N19 between Shannon Free Zone and the Airport to facilitate planned developments by Shannon Group that would be of national and regional strategic importance.
- The R71 needs to be upgraded with provision for access to Shannon Free Zone East from this strategic regional route in accordance with RSES objective RPO 168 and MASP objective 8 and in the interest of improving placemaking and facilitating sustainable economic development within the Free Zone.
- The upgrade and improvement of the L3126 road in Bunratty needs to be delivered in the short term to cater for the projected growth in the tourism industry and to enable Shannon Heritage to progress with ambitious plans for expansion at Bunratty Castle and Folk Park. Shannon Group have highlighted serious road safety concerns at this location that needs to be addressed as a matter of urgency.
- The upgrade of roads in the vicinity of Craggaunowen and Knappogue Castle is necessary to support visitors to these sites. The Ballyroughan road off the R469 leading to Craggaunowen is narrow and the lack of road markings results in potential safety issues, especially for visitors that are familiar with the area. Similarly the L3154 that connects the R470 and R469 (route to Knappogue Castle) is in need of improvements including resurfacing, road markings and improved signage. It is imperative that the upgrade of this poor road infrastructure that provides connectivity to key tourist sites is delivered in the short term to facilitate the projected growth in visitor numbers to these sites.

### **8.5 Walking and Cycling Infrastructure**

The regional and local roads must provide high quality walking and cycling infrastructure. There is a critical need for a **comprehensive walking and cycling network** in Shannon. There are significant gaps and constraints in the existing infrastructure including lack of direct walking and cycling routes from residential estates to the local and regional road network (desire lines), narrow paths and physical barriers to movement.

The draft LSMATS indicates that Metropolitan Towns such as Shannon will have their own Local Transport Plan (LTP) through which objectives for public realm and streetscape enhancements will be developed. These improvements will be instrumental in encouraging greater walking and cycling within Shannon. The LTP should be developed as part of the emerging development plan to ensure that its objectives inform the development management process.

The vision in the current LAP is that Shannon will be a **bicycle friendly town**. The LAP seeks to implement a cycling strategy for the plan area to create high amenity accessible corridors linking the town centre with the industrial zone, the airport, and residential areas. This cycling strategy has not materialised.

The draft LSMATS includes a renewed focus on the development of the cycle network in Shannon that must be supported and facilitated by Clare County Council in objectives within the emerging development plan. Shannon Group support the designation of a number of primary and secondary routes in Shannon. These routes need to be delivered in the short term to address the poor connectivity within the town. The following recommendations should be considered:

- **The designation of Smithstown Road as a primary cycle route as it serves Shannon Free Zone West.**
- **The inclusion of secondary cycle routes within both Shannon Free Zone East and West.**
- **The green route connecting Shannon to Limerick is welcomed however a cycle/ walking route connecting this route to Bunratty is necessary. This route could then extend from Bunratty onto Sixmilebridge.**
- **The promotion of a cycling culture amongst people will require supporting measures including sheltered on street bicycle parking that offers safety and security.**
- **The council should seek to implement a bicycle sharing scheme in Shannon. The bike sharing hubs should be installed at high demand areas at Shannon Airport, Shannon Free Zone and Shannon Town.**

### **8.6 Shannon Estuary**

The Shannon Estuary is Ireland's largest deepwater estuary and covers a distance of 100km from Limerick City to Loop Head with 500 square kilometres of navigable waters. The current Development Plan and LAP note that Shannon's location adjacent to the Estuary, together with its existing infrastructural resources and other competitive advantages, means that it is ideally placed to capitalise on future development potential.

The vision of the Development Plan is based on a series of goals. Goal X seeks "A County Clare that builds on the strategic location and natural resources of the Shannon Estuary by facilitating and maximising its potential for various forms of development while managing the estuarine and natural environment in full compliance with all relevant EC Directives".

LAP Policy Objective 3.12 of the LAP seeks to "*maximise the opportunities for economic and employment generating development as a result of Shannon Town and Environs' strategic location adjacent to the Shannon Estuary*".

*The Strategic Integrated Framework Plan for the Shannon Estuary* was developed to guide the future development and management of the Shannon Estuary. A key objective of the framework is:

*"To support and facilitate the sustainable use of the Estuary by the Cruise Ship Industry by maintaining and safeguarding critical navigational channels, anchorage and berthing facilities, ensuring that all such developments shall not adversely affect species and habitats designated by the Habitats & Birds Directive, Water Framework Directive and all other relevant EU Directives".*

**The emerging development plan should maintain support for the sustainable development of the Shannon Estuary and explore further opportunities to leverage its transportation, economic and tourism potential. Our client**



believes that Shannon could be used as a location for accessing cruise liners. It is submitted that access to cruises from Shannon could significantly enhance the visitor experience and with the airport contribute to seamless travel. The development plan should consider facilitating and promoting such development within Shannon.

### 8.7 Transport Servicing and Infrastructure

The Local Authority should consider including a planning policy objective that would support the development of a **service area on the N19** close to Shannon Airport to support vehicles using the national road network.

**Figure 9 Potential Suitable Location for a Service Area**



The emerging plan should include **strategic policy support for 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.**

The Mobility as a Service (MaaS) industry provides a significant growth opportunity for Shannon following the arrival of JLR and their investment in creating their Software Engineering Centre in the Shannon Free Zone West.

The recent success by Future Mobility Campus Ireland (FMCI) in receiving €4.7m in grant funding from Enterprise Ireland, will create a real world testbed for the Connected and Autonomous Vehicles(CAV) and the Mobility as a Service (MaaS) industry at Shannon.



Collaboration between stakeholders in developing dedicated air corridors for pilot drone projects will be key to Ireland's involvement in green & smart MaaS R&D. This should include drone air corridor connectivity between Shannon Airport and Limerick City.

The planned connectivity between FMCI and the C-ITS national pilot scheme will ultimately provide one of the largest future mobility testbeds globally.

These testbeds, and their partner profiles, will be strategically important, particularly as a focal point for EU funded collaborative solutions to the Sustainable Mobility challenge.

The Future Mobility Campus has the potential to be the centre for cutting edge technology disruption in public transportation, providing scalable solutions for national sustainable mobility. This could include trialling innovative technologies in Buses, Bus Stops and Bus routes through the Shannon Free Zone industrial campus.

This will have a transformative effect on the region. The emerging development plan needs to recognise the potential of these transformative and disruptive technologies and support the development of the RD&I needed to advance this industry sector including national and local sustainable mobility initiatives.

The development plan will need to include an objective for the delivery of car charging infrastructure within Shannon Town to support the transition to electric car use. New developments should also be required to put in car charging infrastructure as part of planning permissions.

## **8.8 Utilities Infrastructure**

### *Water Services*

The sustainable growth of Shannon requires the planned timely provision of services and infrastructure in accordance with the RSES key objective for the *"Provision of infrastructure and services in a sustainable, planned and infrastructure led manner to ensure the sustainable management of water, waste and other environmental resources"*.

It is imperative that adequate utilities infrastructure is available to service the residential and economic development within Shannon in accordance with the ambitious growth envisaged in the NPF and Southern RSES.

Clare County Council must work closely with Irish Water, including through plan consultation processes, to achieve the timely delivery of water services where upgrades are necessary to support future development.

The emerging plan should identify infrastructure capacity issues and ensure water services needs are met by national projects in collaboration with Irish Water as a matter of priority to service future population growth and development of strategic importance in the Southern Region.

## *Energy*

The availability of secure and adequate electricity infrastructure is essential to meet the growth in demand in Shannon. Addressing any deficiencies in the power network is imperative especially to attract and retain high tech industries in the region.

For Shannon Group an excellent supply of power must be available to ensure the redevelopment and expansion plans for the Shannon Free Zone can progress as required. Any deficiencies within the energy infrastructure network could hinder economic development.

Clare County Council must work with Eirgrid to improve and expand the energy infrastructure as required.

With regard to energy requirements, it is considered that the development of a data centre in Shannon, potentially offshore, is highly likely during the period of the forthcoming development plan. It is noted that the current Clare County Development Plan was varied in 2019 to give effect to the Government Policy Statement on the development of data centres in Ireland to facilitate the development of a data centre in Ennis. This incorporation of data centre policy guidance was welcomed; however, the forthcoming development plan must provide more general rather than site specific policy guidance for these types of development.

The emerging plan will need to provide policy guidance on the development of data centres in Clare and consider the energy requirements that will be necessary to facilitate and support such development.

### **8.9 Flood Protection Infrastructure**

Flooding is one of the main environmental risks facing Shannon and its Environs. Given the presence of strategic international assets within the town, Shannon Airport and Shannon Free Zone, and the projected significant increase in population, the delivery of the Shannon and Environs Flood Relief must be prioritised as a strategic objective within the emerging plan and the timeline for the implementation of the scheme brought forward if at all feasible.

The embankment with the River Shannon was damaged by a strong storm in 2014. The Shannon Group Board welcomed the 2018 notification by the Department to provide grant aid of up to 50% for this project. Under the *Significant Infrastructural Development Act*, an initial submission was made in May 2019 to An Bord Pleanála and following determination that it was not a strategic development a planning application was lodged with Clare County Council. Subject to planning approval and conditions therein, works for this project may not commence until 2021 at the earliest. Airport management continue to engage with both Clare County Council and the Office of Public Works in identifying the long-term requirements to strengthen the structure. Specifically, in ensuring the protection of the airport, the industrial zone and Shannon Town, as they are all intrinsically linked. Shannon Group welcomed the announcement in 2018 from then Minister Moran that funding is to be made available for the larger CFRAMs overall project and is in continuing dialogue with department officials on this matter. Shannon Group is not in a position to take on any capital funding obligation for this larger scale project. Shannon Group continue to assert that these embankments should be the responsibility of the OPW.

## 9.0 Built and Natural Heritage, Landscape and Green Infrastructure

The current Shannon LAP seeks to deliver an integrated and coherent Green Infrastructure Framework that encourages walking, cycling and recreation. LAP objective 11.9 seeks to *"outline and implement a cycling strategy for the Plan area, which builds on and connects the existing cycle network, providing high amenity, accessible corridors linking the town centre with the industrial zone, airport and residential neighbourhoods, and offering an alternative and efficient modal choice other than the private car"*.

The Cycling Strategy reinforces the importance of linking the town centre with the following areas and routes in the town:

- Shannon Airport
- Shannon Free Zone Industrial Estate
- Smithstown Industrial Estate
- Shannon Aerospace
- Ennis to Shannon cycle route
- Primary and Secondary Schools
- Rural hinterland around Shannon and proposed looped cycles
- Scenic points of interest within and around Shannon

The cycling proposals for Shannon Town included in the draft Limerick Shannon Metropolitan Area Strategic Plan are generally based on the existing cycling strategy in the LAP.

Shannon Group fully support the implementation of the Shannon Town Green Infrastructure Plan and submit that the plan should be included in the emerging development plan. It is submitted that the estuary trail east should be extended to connect to Bunratty as part of the proposed green route linking Shannon to Limerick.

## 10.0 Climate Change, Renewable Energy and Environment

The emerging Development Plan must incorporate policies and objectives that will help to achieve the targets of the National Climate Action Plan which include a 30% reduction of greenhouse gas emissions by 2030. The Government's Climate Action Plan highlights the requirement for a transformational shift of our economies and societies towards climate resilience and sustainable development and a profound change in the systems and practices which support our lifestyle.

The Issues Paper asks how can the development plan facilitate the transition to a low carbon society?

It is submitted that climate change considerations permeate many development plan issues and overlap significantly with transport, energy, biodiversity, and green infrastructure. Climate change is an urgent issue that must be addressed in the development plan and should therefore be a core consideration throughout the entire plan.

In alignment with the NPF the new County Development Plan must deliver compact, connected, sustainable growth that meets needs for power, heat, travel, land use and other resources in a greatly more efficient and sustainable way.

The principles underpinning the Limerick Shannon MASP include the effective integration of transport planning with spatial planning policies from regional to local level and the alignment of associated transport and infrastructure investment. The RSES states that to the extent practicable development should be carried out

sequentially within the MASP area whereby lands which are or will be most accessible by walking, cycling and public transport including infill and brownfield lands are prioritised.

MASP objective 6 seeks to achieve the National Strategic Outcomes of the NPF through the sustainable and infrastructure led

- *Regeneration, consolidation, and growth of Shannon Town.*
- *Regeneration, consolidation, and growth of strategic residential, employment and nodal locations along public transportation corridors*

MASP objective 7 states that *"It is an objective to support the following sustainable transport priorities in the Limerick Shannon Metropolitan Area subject to their consistency with the recommendations of LSMATS and the outcome of environmental assessments and the planning process:*

- *Investment in sustainable transport infrastructure and public transport services.*
- *The implementation of an integrated, multi modal public transport network across the Metropolitan Area servicing strategic residential and employment growth locations".*

The emerging plan must be aligned with the policies and objectives of the NPF and RSES which promote compact sustainable growth and integrated land use and transport planning and policies, particularly a stronger alignment between where people work and live in the interests of reducing our carbon footprint.

The forthcoming Development Plan should support initiatives by Shannon Group towards achieving the Governments (and EU) Climate Action Plans including;

- Renewable energy projects in the Airport Campus (Airport Campus includes the Shannon Free Zone West) and surrounding land bank
- Innovative pilot and demonstration projects for new renewable energy technologies
- Striving towards sustainable multimodal mobility including enabling infrastructure

### **11.0 Social, Community and Cultural Development**

Shannon Town needs to make provision for the social infrastructure and community facilities that will contribute to a high quality of life for residents and visitors to the town.

The NPF recognises the role of social infrastructural provision in the enhancement of quality of life and the interrelationship between settlement size and the level of infrastructure that can be supported. The significant projected uplift in the population of Shannon will help support additional social and community services provision.

The National Planning Framework and Regional and Spatial Economic Strategy for the Southern Region all highlight the importance of social and community infrastructure and facilities at local level. These principles should be carried into the forthcoming plan.

Shannon Group submit that the proposed development of the Venue facility, a community, civic, cultural and interpretative centre in Shannon Town, would be a

transformational project for the town that would give a renewed sense of place, purpose and community by becoming a focal point socially & culturally. Shannon Group fully support the development of the facility.

### **12.0 Conclusion**

On behalf of our client, we request that the contents of this submission are given careful consideration in the preparation of the Clare County Development Plan 2022-2028. Our clients would be happy to discuss the contents of this submission further with the Local Authority.

We ask that we are included on any mailing list that is created to provide updated on the plan making process ([info@csrlandplan.ie](mailto:info@csrlandplan.ie)).



