



Limerick Chamber Submission on Draft
Clare Development Plan 2023 - 2029

March 2022



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**Limerick
Chamber**
Advancing business together

1. Introduction

Limerick Chamber would like to thank Clare County Council for the opportunity to submit our views on its draft development plan. We welcome the ambitious nature of the plan and look forward to ongoing collaboration between our two organisations.

Limerick Chamber is the largest business representative body in the Mid-West, with over 420 member organisations who support over 50,000 jobs across the region. The opportunity to provide input to this process is welcomed, with such close ties between both counties situated within the Mid-West region. Limerick Chamber is highly supportive of developing Limerick's overall strategic vision and thus, the response below highlights a number of concerns around plans within the Clare County Development Plan (CCDP) detailing the planned University of Limerick University Town and Strategic Development Zone (SDZ) which have the potential to impact the progress and development of Limerick City.

The decline in both footfall and private investment in the city centre over the past decade has had a detrimental effect on businesses in Limerick City and thus the wider region, with the impact of the COVID-19 pandemic only exacerbating these effects over the last two years. An ambitious plan for Limerick City has been laid out, targeting the revitalisation of the city centre through a number of strategic developments which will improve housing, public and active transport and footfall levels which aim to revitalise and repopulate the city centre. While the proposed University of Limerick University Town and SDZ within the CCDP are seen as a positive development for the Mid-West region, Limerick Chamber expresses concern over what impact this development will have on both current projects and future developments not just within Limerick City but the region as a whole.

Due to low levels of public and private delivery in the city centre, and a long development timeline, it is now more important than ever to not only prioritise development in the city centre, but also accelerate delivery to make up for ground lost. The development of Limerick city centre, as the primary economic growth engine of the Mid-West, will serve to provide economic spillovers throughout the region providing a more equal economic growth, while also adhering to local and national policy.

The implementation of any future potential SDZ will need a strong and prosperous city centre as an enabler. To do this, the city centre must be a development priority for the region. Allowing mixed use development to continue on suburban greenfield sites will exacerbate the hollowing out

of the city centre, which will ultimately damage the economic potential of any future projects. Exacerbating an already existing doughnut effect prevalent in Limerick through suburban greenfield development will only serve to harm the economic growth of Limerick City and the wider Mid-West region

2. Looking Ahead

Given Project Ireland 2040's ambition of regenerating urban centres under its National Planning Framework, it is essential that the focus remain on progressing projects which will aid in revitalising urban centres i.e. the city centre of Limerick. In order to achieve this urban revitalisation, incentivising people into the city centre to both live and, as a result dwell longer will be key. This requires the delivery of adequate housing to account for the expected growth in population. In tandem with this, the provision of adequate transport infrastructure to accommodate this growing population is essential. This projected increase in population and subsequent activity in Limerick city centre will be aided by ongoing public and private investment in the city centre. Such projects include the Opera site, the International Rugby Experience, the Cleaves site, University of Limerick City Centre Campus and the O'Connell Street revitalisation plans, all of which will play a role in bolstering the attractiveness of the city centre.

However, the view of Limerick Chamber is that while these projects will play a key role in improving footfall levels and economic activity within the city centre, encouraging people to live in the city centre as well as achieving sustainable levels of footfall will have the biggest impact for Limerick City, the economic engine of the Mid-West region. Both aforementioned factors are also closely connected to the development of the University of Limerick city centre Campus. The presence of a third level institute within the city centre will bring more students into the city centre, resulting in increased footfall levels at a sustained rate while also improving economic activity for businesses with this increased influx of consumers into the city centre. It will also likely result in many students renting and living within the existing footprint of the city. This will also encourage an all-day economy in the city centre.

The prioritisation and development of Limerick city centre serves to benefit the entire region, including Clare and towns within close proximity such as Ennis and Shannon. Prioritising development in Limerick city centre allows new developments take advantage of existing infrastructure already in place, sometimes with the need to marginally improve services rather than provide new infrastructure at a higher cost. Furthermore, by building in an existing urban centre, new developments adhere to the core strategies contained in the National Planning Framework around densification and compact growth.

3. Policy & Strategy Context

Both national and regional stated policy places emphasis on the critical importance of revitalising existing urban centres. It is crucial that the CCDP reflect this context in the draft development plan. Particular attention is drawn to the following policy frameworks:

Project Ireland 2040:

At national level, Project Ireland 2040 has identified that the population of Ireland is expected to grow by 1 million by 2040, with 50% of that growth expected to be within the five urban areas which includes Limerick City. In the context of Project Ireland 2040, the Government's National Planning Framework (NPF) sets out to achieve more compact development within urban spaces, focusing on 4 key areas:

1. 'Liveability' or quality of life of urban spaces,
2. Making the continuous revitalisation and development of existing built-up areas as attractive and viable as greenfield development,
3. Tackling legacies such as concentrations of disadvantage in central urban areas and
4. Linking revitalisation and redevelopment initiatives to climate action.

These 4 key areas each contribute to need to focus on delivering the University of Limerick's City Centre Campus and other urban revitalising public projects. Limerick city centre has been in decline over the last number of years, with issues ranging from a lack of private investment, housing provision and low footfall levels. Fundamentally, the introduction of students into the city centre will have a directly positive impact on the NPF target of improving the liveability of Limerick city as one of the seven key urban spaces in the NPF.

Looking to other international examples (detailed in section 5), the positive impact that placing students in the city centre has is evident. Students will choose to live in the city centre, meaning contributing to a higher sustainable level of footfall while also contributing to the city centre economy through activities such as buying groceries, spending money in centrally located retail outlets as well as cafes, bars and restaurants.

A core target of the NPF is utilising the existing stock across both residential and commercial on brownfield sites, especially in urban areas. Limerick Chamber welcomed University of Limerick's purchase of the old Dunnes site in Limerick city centre, leading the way in the regeneration of brownfield sites in Limerick City.

It is important that University of Limerick prioritise the development, as outlined in their strategy (UL@50). Such a development will highlight to future potential investors that existing built up areas have as much potential as greenfield sites.

The concentrations of disadvantage in central and urban areas can also be addressed through the development of the University of Limerick's City Centre campus. Previous analysis by [Indecon](#) of Limerick City, identified that 8 out of the top 10 blackspots in the country are located in the Limerick Metropolitan area. Areas within Limerick City showed concerning levels of high unemployment such as John's A (Kings Island: 58.3%), Galvone B (Southill: 45.0%), Ballynanty (43.6%), Abbey C (Pennywell, 41.9%) and Prospect B (Ballinacurra, Weston: 40.7%). Through continued investment in the city centre, the university can positively impact on these concentrations of disadvantaged areas by providing pathways into education to locals, giving the area an overall uplift and increasing much needed investment in the area. UL has previously committed to supporting these disadvantaged communities through its own [strategic plan 2019 – 2024](#) where it notes;

"Firm commitments are made to further enhance educational opportunities for disadvantaged communities in this strategic plan in recognition of UL's broader responsibility across the Mid-West".

It is well noted within the Government's NPF that developing brownfield sites and utilising the existing stock of vacant buildings, both commercial and residential, are keys to not only revitalising the city centre, but also will contribute to Ireland's climate efforts. Through renovations of older buildings with poor energy efficiency and subsequently poor BER ratings, Limerick's City Centre housing stock will become greener and more energy efficient. This is relevant to the presence of the city centre campus as more people will live in the city centre, driving the demand for housing and in turn the regeneration of the available Georgian and other stock in Limerick city centre.

The proposed SDZ in South Clare takes an opposing stance to this vision of 'compact, urban growth'. In order for the Government's NPF to be successful, the focus on regenerating urban centres needs to be at the core of local development plans. In contrast to green field development, building within an existing urban footprint allows for economies of scale with existing infrastructure already in place to be utilised. The provision of adequate infrastructure around housing and transport are two core components that must be addressed to achieve what's set out in Project Ireland 2040, these must be complete in advance (or in tandem) with other new development. This must be done with a collaborative approach across local authorities, organisations and county lines.

It is the view of Limerick Chamber, that the proposed SDZ and University Town does not adhere to the strategic goals of the NPF of consolidated and compact growth within existing urban footprint.

Limerick 2030 an Economic and Spatial Plan & Limerick Development Plan:

In a more local context, the current Limerick 2030 Economic and Spatial Plan also focuses on developing Limerick City and, more specifically the city centre which is seen as the economic engine of the Mid-West region. Goals within this plan outline the strategy to attract and retain young talent through the provision of learning opportunities by means of cooperation among local HEIs, while also providing teaching and residential accommodation in the heart of the city centre to facilitate such plans. Similarity, the Limerick Development Plan (LDP) sets out its strategy for identifying ways to improve the vitality of the city centre, recognising it as its core and being central to driving economic growth. Goals in this development plan identify several projects that will help to revitalise the city centre as a whole, including the ongoing Opera Centre, the redevelopment of the Cleeves site and the O'Connell Street works among other projects. These projects will lead to increased activity within the city centre with the plan to improve footfall and attract more private investment into the city centre, both of which have been lacking in the last number of years.

These plans also carefully demonstrate a clear alignment with the NPF. It is of concern that there is no clear alignment between the University Town and SDZ contained in the CCDP and the existing Limerick Development Plan and the NPF which are already in progress.

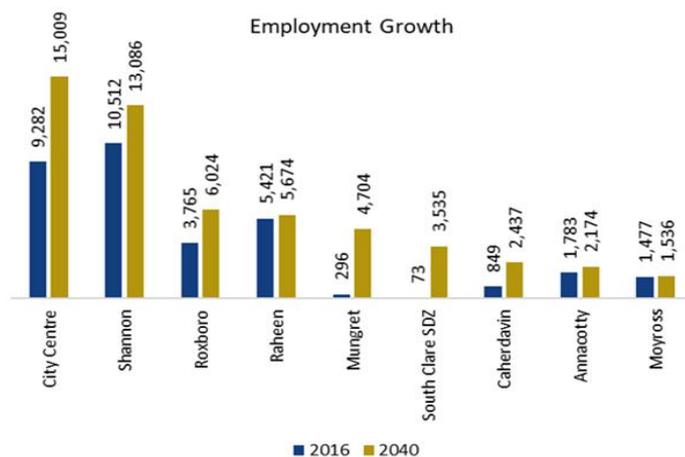
Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)

The current draft LSMATS prioritises growth outside the city centre in favour for up-and-coming suburban areas. Expectations regarding population growth in the report for the city centre are set far lower than its adjoining suburbs, where the population in the city centre is projected to increase by 70% (from 6,071 to 10,337) by 2040. Raheen & Annacotty, two large suburban areas around Limerick were identified to have population growth of 116% (3,446 to 7,449) and 72% (5,497 to 9,455) respectively. A concern for Limerick Chamber is the enhanced focus and expectation of the population proposed for these suburbs and the University Town and SDZ, where it is modelled to increase by 2,802% from 379 to 11,000 by 2040.

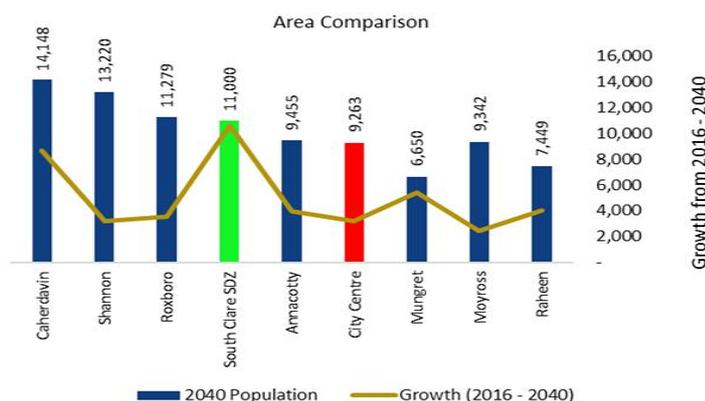
This modelled growth projected under the LSMATS would put the University Town and SDZ, with a modelled 11,000 people, at a larger population size than Castletroy (9,817), Moyross (9,342), Clareview (8,941), Mungret (6,650), Raheen (7,449) and put it on an almost equal footing with Dooradoyle (13,963), Shannon (13,220) and Roxboro (11,279) by 2040. Indeed, the University area itself is projected to grow by just 1,000 people over the same time period (2016 to 2040). The University Town and SDZ will become bigger or almost as big as some of Limerick's most populous areas and will have a greater projected population than the City Centre by 2040 – 9,263 people versus a modelled 11,000.

Such assumptions on population growth will have major implications for how the city will develop over the lifetime of the development plan. Continued growth in these areas will only encourage urban sprawl and further contribute to knock-on effects such as increased private car usage and footfall decline in the city centre as well as a stifling of an all-day economy and a prioritisation of infrastructure investment in suburban areas.

The LSMATS prioritises growth in areas outside of the city, which, in the long run will likely result in a negative economic impact on urban centre of Limerick but also the wider Mid-West region. Understanding the need for shorter journey options by public transport and active modes to in and around the city centre is essential to supporting compact growth.



Data Source: LSMATS



Data Source: LSMATS

In fact, much of the employment growth forecasted for the city is a transitional nature with those people not forecasted to also live in the city centre – c. 5,746 employees. An increase of employees living and working in the area would increase the viability of an all-day economy in the City Centre.

The prioritisation of the SDZ and its reliance on the Limerick Northern Distributor Road (LNDR) will likely lead to much needed transport investment being pulled from Limerick city centre and diverted towards providing road infrastructure to the suburbs, resulting in a loss for transport investment in the city. There is more detail on this in section 6.

UL@50 Strategic Plan 2019 - 2024

The [University of Limerick's Strategic Plan](#) makes several commitments to the Limerick city centre that Limerick Chamber would like to see fulfilled before any further expansion of the University is progressed. Speaking on investment, the Strategic Plan outlines:

“An additional 4,000 students during the life of this plan, rising in the following years to 8,000, many of whom will be based in the city centre in a significant landmark building, thus bringing an additional annual spend of circa €30m to the city and region, and creating new opportunities for civil and civic engagement”

“In the years to come, we will expand our reach, beginning with the Digital District at Parkpoint and the Limerick City Campus before expanding to Dublin and abroad. We will work with the city's other third-level institutions, Limerick Institute of Technology and Mary Immaculate College, to reimagine Limerick as a student city and to build a regional brand for third-level education.”

These much-welcomed ambitions are not reflected in the LSMATS or the proposed SDZ / University Town and it appears that any future growth of the University is going to be focused on the University Town and SDZ. The strategy makes a firm commitment to developing the Limerick City Campus (Goal 4) behind the Digital District and envisages working with other HEI's to make Limerick a student city. Furthermore, in the strategy document, while there is a mention of expansion and joining of the North Campus and also engagement with local councils regarding the proposed SDZ – the scale and impact of an SDZ is not reflected in the overall strategy document. There is a risk with the new focus on expanding the University Town that it could possibly stifle and deprioritise plans for Limerick city centre.

Regional Spatial and Economic Spatial (RSES):

The RSES further acknowledges the importance of city centre consolidation and regeneration through improved placemaking, the use of underutilised landbanks and

existing housing stock within the city. In addition to this, it identifies that enhancing the availability of sustainable transport options in Limerick City is an important factor in creating a better experience for visitors to the City Centre. This strategy identifies the importance of Limerick City's revitalisation and the areas that must be targeted in order to accomplish this.

This strategy also acknowledges the proposed SDZ. The RSES notes that this proposed SDZ is identified as being a catalyst for the further economic and social development for the Mid-West while being highly significant for Limerick City, complementing the Limerick 2030 plan. While there is no doubt that such a development will be beneficial for the region, it is important to examine any potential negative economic impacts on the development of Limerick city centre. Limerick city centre has been identified as a focus of the NPF given the recognition of the need to develop Ireland's urban areas to deal with the forecasted population growth over the coming years. The proposed SDZ does not encourage urban development and in some instances may stifle it due to detracting investment and population to other parts of the region.

Further to this, it is noted in the RSES that the SDZ will be accessible through the proposed LNDR, signalling that the plan may be contingent on this road being developed.

“For example, enabling infrastructure such as the Limerick Northern Distributor Road (LNDR) will open lands to the north of the city for consolidation and expansion. ”

The concern around this is that should the LNDR either not be approved or significantly delayed it will lead to an increase in the levels of congestion that are already a significant issue in the Castletroy area. It is important that the appropriate sustainable transport infrastructure is developed with links between this SDZ and Limerick City. These sustainable transport developments must be streamlined and brought forward with any developments in the SDZ and University Town rather than allowing the development of the University Town to inform these plans further down the line. For example, the RSES identifies developing a citywide public transport network with enhanced accessibility from the centre to the National Technology Park, the university and the airport along with a strategic cycleway network. The National Transport Authority are currently working on this through the LSMATS.

While the RSES prioritises two items; the development of the city centre and the SDZ, that may seem mutually exclusive, through consensus building, research and collaboration, a balance may be agreed. However, such balance will require significant prioritisation of Limerick city centre and adherence to the NPF.

4. Student & Residential Accommodation

The lack of affordable and appropriate homes available in both the context of student and residential accommodation is an area that must be addressed in this development plan to cater for the increase number of residents in the SDZ / University Town. Currently, the proposed SDZ in South Clare identifies 3,500 jobs being created while the LSMATS models a population of 11,000. As per the CCDP, housing provision is dependant on completing a masterplan. Currently, the [CCDP](#) has an indicative figure of 123+ for housing. This is not sufficient and a housing review / target must be included in the CCDP. Greater clarity around housing provision must be completed as part of the CCDP process. As per [guidelines](#) from the Office of the Planning Regulator, developments plans must include proposals for the requirements for different types of housing, whether public or private. Limerick Chamber calls on the Clare County Council to provide clarity around housing provision and account for the significant requirements that will likely follow as a result of this development plan and potential granting of an SDZ designation. Such accomodation proposals must fall within the scope of the strategy outlined in the NPF.

According to [data](#) available from the Department of Education and Skills and based on past growth, it is possible that the full-time student population of the University of Limerick could reach 16,417 by 2030. This is in comparison to its latest available full-time enrolment figures provide by the [Higher Education Authority \(HEA\)](#) which stand at 14,461 for 2021. These projections include international students which have been an increasing factor in the university over recent years, growing by over 200% over the last 10 years alone. This further emphasises the need for an appropriate level of mixed housing to be developed to accommodate these projections. It is essential that appropriate housing is a primary objective of the CCDP and SDZ given the population projections of students, workers and residents provided. This could be completed in collaboration with Limerick City and County Council to develop appropriate housing in the city centre serviced by active and sustainable transport options for the benefit of the whole Mid-West region.

Difficulties in finding appropriate and affordable housing makes the Mid-West region a less attractive proposition for foreign direct investment. Increased housing prices resulting from a lack of affordable and appropriate housing stock directly hurts local businesses by making it harder to hire and retain key staff. These costs lead to increased wage

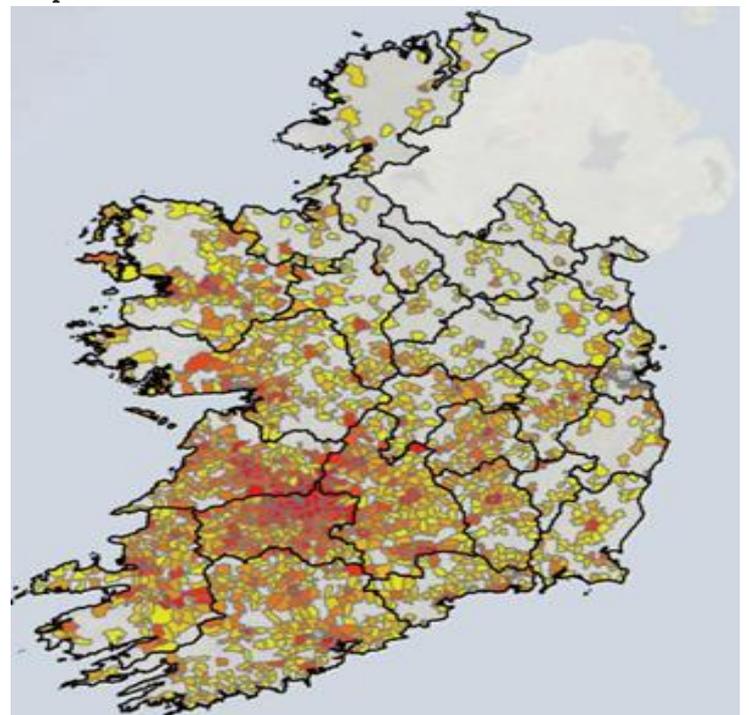
demands incommensurate with domestic growth which is adding to the recruitment challenges that companies are reporting in key sectors of the economy.

Looking at the demography of where students who attend the University of Limerick originate from, in 2019 it is clear that a large portion of the students both currently, and potentially in the future, that travel to the university are from areas where it is not feasible to stay in their family homes and travel to college on a daily basis.

A [report](#) conducted by the HEA in 2019 identified that 47% of students attending the University of Limerick were from the Mid-West region, meaning that over half of the students attending the university were from areas that would likely require student accommodation given the distance they lived from the university. Furthermore, this report identifies that the average distance from students home addresses to the college is 92km (82km median), with the mean travel time from home addresses to the college is 76 minutes. It is also likely that this proportion of students requiring accommodation is much higher given it is not always possible for students to travel daily from all corners of the Mid-West. In tandem with this, the needs of interational students are not taken into consideration who will naturally require accommodation for the duration of their stay.

Appropriate and affordable student accommodation in a sustainable commuting distance is therefore essential in order to accommodate the identified growing population. This could be accommodated in the city centre due to the availability of land.

Dispersion of UL Students based on home location



(HEA, 2019)

Between 2011 and 2020 International enrolment in the university has grown by over 200% (517 students to 1,754). The growing levels of international enrolment only further strengthens the case for more affordable and appropriate accommodation for incoming international students. Interventions within the housing space need to be focused on initiatives which will increase the availability of accommodation that is both affordable and appropriate to the needs of the population. This will be a large undertaking that must be addressed in conjunction with Limerick City and County Council and other stakeholders in the region. This housing need could ultimately be provided for by utilising available land in Limerick city in conjunction with housing delivery partners.

The 2021 [new dwelling completion data](#) for Limerick and Clare was 606 and 410 homes respectively. In Clare, just 214 homes were not one-off housing while in Limerick just 439 homes were not one-off housing. Also concerning is that just 5 apartments were built in Clare while just 62 were built in Limerick. The plan to implement such a large population increase will require a significant increase in the right type of housing and investment that reflects such; affordable, sustainable and the correct typology for accommodating a student population. This scope goes beyond what both counties have delivered over the last number of years. Not only will housing have to be within the metrics outlined above but it will have to be located in an area that can account for this growth – which is likely to be the city centre given its close proximity to travel, social and employment infrastructure as well as the availability of state-owned land.

To put these numbers into perspective, the [Economic & Social Research Institute \(ESRI\)](#) outline that Limerick needs an annual housing provision of 1,826 to meet the strategic goals of the NPF. This represents an almost tripling of Limerick's existing new housing delivery.

Recent analysis by [Indecon](#) identified a need for 1,100 new homes to be built annually for Limerick to meet the housing requirements over the next 20 years under a base case scenario. This figure does not account for the undersupply that has built up in recent years that has resulted in a significant proportion of our 25-34 year olds still having to live in their family home or with other relatives. It is therefore essential that details around proposed housing in the SDZ is brought forward prior to the development of the SDZ and University Town and in conjunction with both Limerick and Clare local authorities and other stakeholders.

Recommendations:

- The CCDP must include greater clarity on the volume of housing to be provided in the SDZ and University Town
- Engage with land holders and home building providers for the provision of student and residential accommodation in Limerick city centre
- A large increase in appropriate and affordable housing must be central to the plan and must be delivered in conjunction with other stakeholders – Limerick Chamber feels that the city centre of Limerick is an appropriate location for such housing given its proximity to the main public transport nodes of the Mid-West, proximity to employment opportunities and existing social infrastructure in place
- Any housing or other plan that is implemented must take account potential detraction from Limerick city centre but also the synergies that might be available if Limerick city centre is included in the plan. Housing provision must adhere to the strategy outlined within the NPF
- Housing offerings must be sustainable from an affordable and environmental perspective, but also must cater for people from all ability backgrounds to promote and inclusive and diverse student population
- Limerick city centre to be prioritised in line with the University of Limerick's Strategic Plan (UL@50) and other national and local policy documents

5. International Context

European Educational Campus Examples:

In an international context, there are several examples where European HEIs have expanded their existing campus by focusing on increasing urban integration. Universities in other European cities are often dispersed across multiple locations within their city, with whole faculties being located in separate buildings around the city, but accessible via an efficient public transport infrastructure. This in turn allows for a spread of students across various locations, where they live and contribute to the local economy thus allowing for a more equal economic spill over to the wider urban area. There are examples of this urban integration of education across several European universities, with the benefits that they bring apparent through high levels of activity and vitality.

University of the Basque Country, Spain

Located across the Basque region in North Spain, over the last number of years this university has seen itself expand and currently is made up of 3 campuses. Each campus also contains various departments dispersed across its province. For example, the Biscay Campus which is located near the city of Bilbao contains 15 faculties across 4 municipalities. The 42,869 students are dispersed across these various locations in and around cities such as Bilbao, with faculties ranging in size and student population. The vast spread of various campuses and faculties result in a number of positive externalities to the Basque region and the city of Bilbao. Students live across the city near campuses rather than being located in one large area, bringing a vibrant and lively atmosphere to the area. An important detail in the success of this university is the high level of public transport infrastructure available in the city. Both bus and light rail along with micro-mobility options such as scooters and bikes are frequently available at affordable rates throughout the city. Such a vastly spread campus would not be possible without such infrastructure in place.

University of Copenhagen, Denmark

This university has different faculties located across different areas in Copenhagen. The design and layout of each campus means that each campus area is integrated into the city of Copenhagen, allowing students to use the facilities available in the city, adding an element of vigor to the local area while encouraging an all-day economy. The provision of transport options is also noted in that it is easy to move between campuses via bike or public transportation. The 37,493 students are neatly spread

across 4 campuses throughout Copenhagen. For example, the Frederiksberg Campus is home to 4,000 students who study 22 undergraduate and graduate programmes, the North Campus contains approximately 12,000 students enrolled in two faculties offering 48 undergraduate and post graduate programmes while the South campus offers 100 graduate and undergraduate programmes to circa 15,000 students. The university also has a City Campus which hosts 6,700 students across 16 undergraduate and post graduate programmes.

Lund University, Sweden

Located in Sweden, this university contains nine faculties with these being spread across campuses in Lund, Malmö, Helsingborg and Ljungbyhed. The city of Lund is the core campus in this University and home to just over 10,000 students, with the remaining campus locations being sole departments such as the campus in Helsingborg which hosts the Engineering faculty with a population of c.4,000 students. This example of a university with a large main campus along with supplementary smaller / satellite campuses with single faculties is a model that the University of Limerick could certainly emulate, given the expected development of the city centre campus at the old Dunnes site. The opportunity to locate a whole faculty in the city centre is shown to have significant economic benefits based on other European examples.

Lund University were a key stakeholder in setting up, and operating, the nearby Ideon Science Park in collaboration with the Swedish real estate company Wihlborgs Fastigheter AB, and the Lund Municipality. Established in the 1970's through the restructure of the Skåne business community, the presence of this facility has seen companies such as Sony, Ericsson, Active Biotech and Gambro locate in its vicinity. The park is also a short 15-minute walk from the main Lund University Campus in the city centre. The close proximity of this Science Park to the city centre campus means that sustainable transport options such as walking, cycling and bus or rail are simple and efficient to use. The Ideon brand itself is managed through a collective of the Administrative Board of Skåne, Lund University, the Chamber of Commerce and Industry of Southern Sweden.

The relationship between the University of Lund and Ideon Science Park has seen a vast range of innovations being born there. A [report](#) in 1993 from the School of Economics at Växjö University that showed that Ideon Science Park had generated over 2000 new jobs.

International Research / Innovation Parks Benchmarking: Map of Stanford Campus and Palo Alto Downtown

There are international examples where the introduction of Research Parks in collaboration with institutes of higher education have worked, however, there some distinct differences between the international environment and the Limerick / Clare environment

Stanford University / Stanford Research Park (SRP)

Stanford University was established in 1891, Initially, the University was set up with [8,180](#) acres of land. The SRP was established in 1951 as a joint venture between Stanford University and the City of Palo Alto. It is important to note that the SRP and Stanford University Campus were established adjacent to the City of Paolo Alto.

Key Facts:

- The SRP currently comprises of 700 acres
- The SRP has 150 companies
- The SRP and Campus has 630 buildings, 140 retail stores, 1,190 owner occupied homes for faculty, 1,170 rental homes for faculty and staff.

In 2019, Stanford Established its [Redwood Campus](#), a satellite campus located five miles from the main Stanford campus. The Redwood campus was designed to integrate with the existing local community through building design, street improvements and landscaping. The Redwood campus offers significant sustainable transport options by running free shuttle buses (for the public and staff) to the Redwood City Caltrain Station.

Key Learnings from Stanford:

- The University has / had a significant landbank within its ownership
- The SRP and University were built adjacent to the City of Paolo Alto and not in a suburban area
- The campus and SRP have significant public and active transport routes linking them with the city
- Stanford is within 1 hour drive of the major US cities of San Francisco, Berkley, Oakland and San Jose
- Stanford is a [\\$7.4 billion](#) enterprise with access to an endowment of \$37.8 billion - 22% of annual funding comes from the provision of health care services. This diversity in funding allows Stanford to not be overly reliant on one funding source
- Stanford is a private university



(Source: Stanford Student Enterprises & Stanford Libraries, 1996)

Corridors Not Clusters?

Dulles Technology Corridor (DTC)

While not a direct comparison, the DTC is a case study on how corridors, rather than clusters, can benefit regions without the need to locate research, innovation, enterprise and education in the one campus. Of course, any plan for a corridor in an Irish context must adhere to the National Planning Framework and be built within an existing urban footprint.

The DTC is a string of communities linearly spread along Virginia State Route 7 and 267 in the US. The DTC was transformed from a residential area to a business hub with an investment in an internet exchange point which spurred further investment from AOL, YAHOO! and AT&T. Now, the region is responsible for 70% of the world's internet traffic. The DTC is home to some of the worlds largest technology giants with offices for Microsoft, Apple, Facebook, Amazon and Google. In total, there are over 30,000 research, technological and development focused firms operating inside the DTC. In the decade leading to 2019, 75 data centres opened in the area accounting for 10 million sq.ft of space.

There are six key factors which enabled the growth of the DTC, which are comparable to resources available in Limerick and the wider Mid-West region:

- 1) Access to power / energy
- 2) Water abundance for data centres
- 3) Fibre optic connectivity
- 4) Steady pipeline of educated workers
- 5) Local Business Resources
- 6) Space to build

Limerick has access to bountiful resources that fall within these six key factors. Firstly, Limerick, and the Mid-West, have access to a potential [80GW](#) source of offshore wind energy while also having proximity to Moneypoint in the interim. Being situated along the Shannon with proximity to the Atlantic Ocean and Shannon ensures that Limerick has the water requirements for data centres. Limerick is also at a crossroad for fibre optic connectivity in Ireland with an [intersection](#) of the CIE Blackhaul, Bórd Gáis Blackhaul and ESBT Blackhaul. Limerick has a healthy landbank of state-owned land (section 7). Furthermore, Institutes of Higher Education in Limerick have c. 24,000 students per year (full-time and part-time) which ensures a steady pipeline of well-educated workers.

Not only does Limerick and the Mid-West fall within these key factors, but it also has existing infrastructure in place that could possibly be brought into the corridor; Lero, Confirm, Bernal Institute, Shannon ABC, National Bioeconomy Campus, Clinical Education and Research Centre and Future Mobility Campus Ireland.

This example should serve to educate on other avenues that might be pursued rather than a direct proposal. Any plan would have to be well research prior to enactment and keep within the goals of the NPF.

- Recommendations:**
- Emulate other European cities approaches to dispersing their university across more than one location. Universities which have a city centre campus have shown the benefits it has on the vibrancy of the city. There are cases where urban domiciled universities successfully implement research and industrial parks.
 - Adopt best practice guidelines from European universities in respect of urban development and placemaking
 - Focus on the provision of a sustainable transport network for students and staff and other visitors
 - Investigate the potential for other avenues of targeted investment, such as a corridor built around existing urban areas, which may provide a more equal spread of economic growth

Fibre Optic Connectivity Ireland



6. Transport

Limerick Northern Distributor Road (LNDR)

Supporting policy documents for the implement of an SDZ appear to be overly reliant on the implementation of the LNDR. While Limerick Chamber is open to the idea of the LNDR, to overly rely on its delivery to expand the university is a key risk and could potentially lead to further congestion issues at the south entrance to the campus as well as using private vehicles for transport unless other avenues are examined such as increased expansion in Limerick city centre.

The Southern RSES [document](#) lists the LNDR as a priority Metropolitan Area Strategic Plan (MASP) project and outlines and that its implementation will “improve access to the University of Limerick and the IDA National Technology Park”. Furthermore, the RSES, when speaking of the SDZ, outlines that “the site will be accessible through a new link from the planned LNDR”. The RSES appears not to put forward any other transport options for the SDZ that are not contingent on the LNDR. This is a risk and could pose a negative outcome.

While the LSMATS does have a focus on cycling and bus connectivity it does prioritise the use of the LNDR as a key enabler for the SDZ and expansion of the North Campus;

“Development of the Limerick Northern Distributor Route (LNDR) to enhance access across the region to the University of Limerick and proposed South Clare SDZ, the IDA national technology park”

The LNDR poses a key political risk, with Government priorities in recent years shifting from a private vehicle model to more sustainable, active and public transport model. Speaking about the LNDR, Minister Eamonn Ryan [outlined](#) that “My clear view is the Northern Distributor Road would take Limerick in a completely different direction into Clare. I acknowledge the college and the businesses upstream along the River Shannon will want to do that and will see that as an appropriate development.

But we cannot say we will build back the centre of the core of Limerick, and build around public transport and at the same time, extend into Clare on a roads-based system, which can only accentuate or continue a dispersed, unsustainable development model.” He added: “Taking an alternative route on an unsustainable, uneconomic basis, without good transport planning in regard to the roads in County Clare would be the last thing we should do.” This outlines a key political risk which may signal the second phase of the LNDR not moving forward. The development plan and SDZ must put in place alternative plans that focus on sustainable transport plans in the main existing route to the south of the campus and further integration with Limerick city centre which can enable synergies with existing infrastructure

Traffic Congestion & Alternate Routes

If the LNDR does not proceed, and the SDZ does, there is an alternative route that bypasses the main gate to the west that allows access to the University Campus to the rear of the Kemmy Business School. However, it is unlikely that the existing road network could handle such a large increase in traffic (unless a large-scale adaption and implementation of a public transport plan). On initial examination there appears to be some issues with this route.

With [data](#) from the Office of Public Works (OPW), we can see that this alternative route borders a floodplain which runs along the west side of the road. Given the risk of flooding it is likely not a viable option for increasing vehicle flow to the University.

While the alternative route with access to the west of the campus is prone to flooding, opening up another route into the campus could encourage more private vehicle use. All avenues to the campus suffer from congestion at peak times (5:00 pm), opening up additional routes into the campus is unlikely to mitigate the congestion issues around the Groody roundabout.

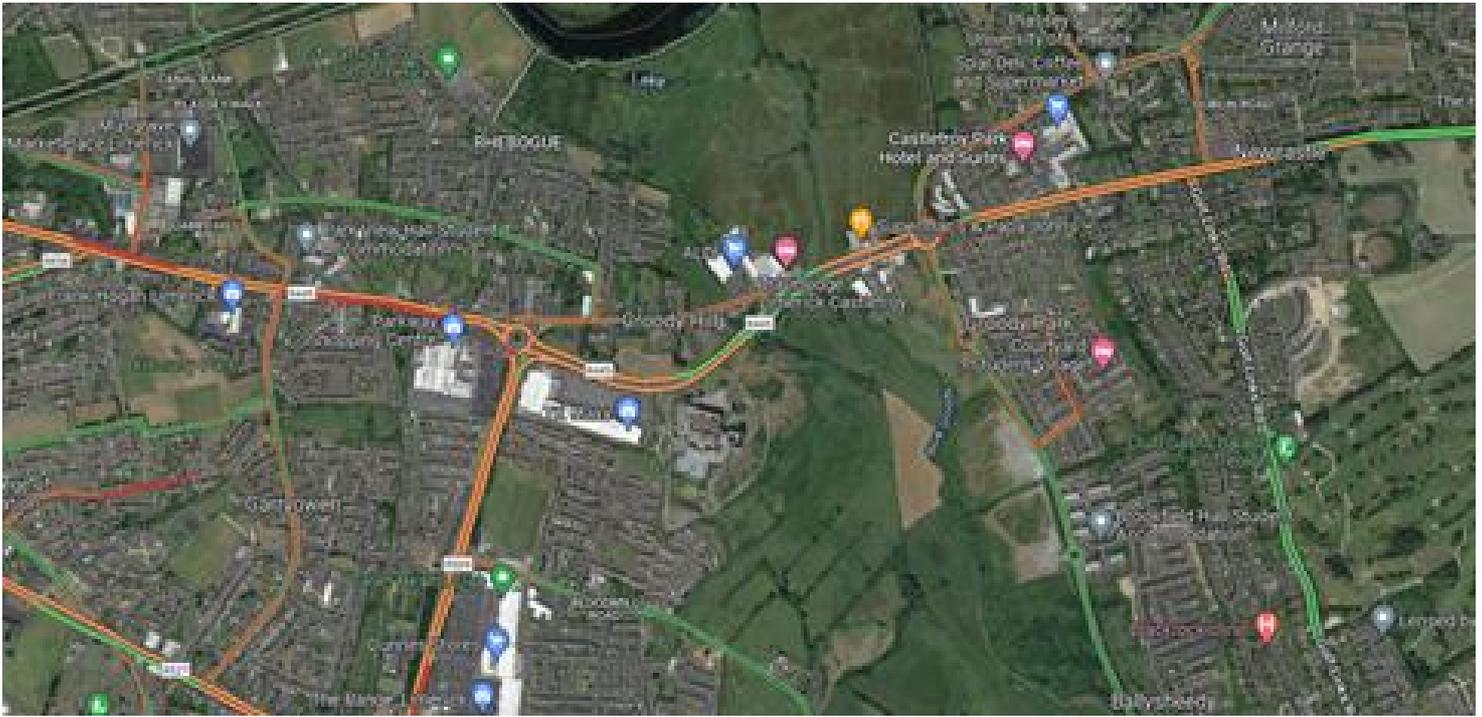
Alternative Route Flood Plain:



— = Alternative Road Route

Map Source: OPW

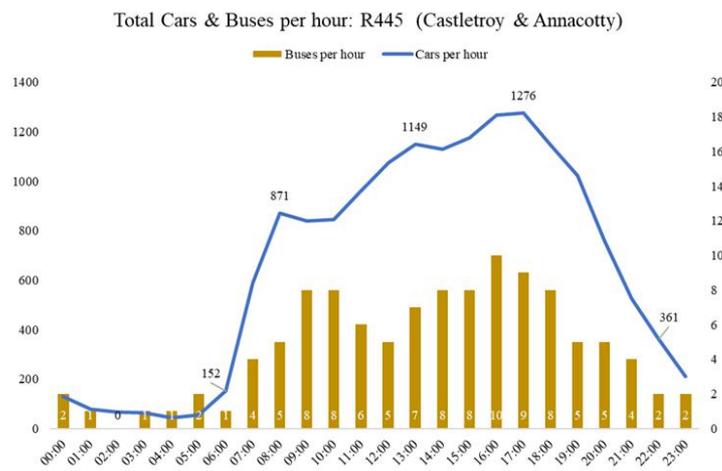
Peak Time Traffic Congestion R445:



Map Source: Google Maps

Traffic congestion in the Castleberry and Annacotty area is a key concern for Limerick Chamber if the LNDR does not go ahead or is subject to delays. The continued growth of private car dominance and the subsequent traffic congestion that occurs will continue to be a core issue.

In order to accommodate for these levels of growth and to deal with existing issues, the necessary infrastructure must be delivered. Only through increased use of appropriate and sustainable transport infrastructure can the congestion issues around this part of the city be reduced. Should the LNDR not go ahead or be significantly delayed, in conjunction with low public transport options, the dominance of private cars in this area will only continue and lead to the worsening of the levels of congestion already seen. Alleviating this congestion through the delivery of the appropriate transport infrastructure must be a core item of delivery. However, this investment in infrastructure must not detract or deprioritise investment in the city centre, and must be put in place prior to the advancement of any plans.



Data Source: IDASO

The most recent traffic data available further highlights the transport related issues experienced in this area, with a clear dominance of private cars being evident as shown above. The levels of growth and expansion that this area has experienced, both in terms of residential expansion and business growth has no doubt significantly contributed to this issue of congestion in the area.

Sustainability, Public Transport & Future Routes

The availability of an effective public transport network will be essential for Limerick City (particularly in the context of projected population growth) moving forward, but also in the context of the proposed SDZ. The need for further investment in sustainable transport for Limerick and its connecting areas is further highlighted in Indecon's Future Limerick Report, where it is noted that despite the reduction in size of the Limerick fleet of buses (36 to 32) between 2017 and 2019, the levels of passengers rose from 2.8 million to 3.9 million.

Should the proposed SDZ go ahead without the appropriate public and active transport infrastructure in place, especially in the absence of the LNDR, issues such as traffic congestion, noise pollution and air quality will only continue to deteriorate. The dominance of private cars has been a key issue which impacts the accessibility of Limerick city on a daily basis, with [51.3%](#) of the population travelling by car (significantly higher than levels in Dublin at 32.3%). Such trends will only spread across the region without the correct funding and schemes in place to address these issues. The draft LSMATS provides for cycling and bus infrastructure which would link Limerick city centre to the University of Limerick Campus allowing people to sustainably travel between both but this must remain a priority.

The latest NDP update has detailed the Governments plans for investment in both public and active methods of transport. €360 million has been allocated towards active travel & greenways alone. Within this, more than [€24 million](#) has been allocated to Limerick City and County Council from the NTA to progress key cycling and pedestrian infrastructure projects. Along with a commitment to delivering walking & cycling infrastructure over next 5 years, the government has committed to having the majority of its BusConnects substantially completed by 2030. Details of Limericks BusConnects program will be included in the upcoming LSMATS Draft 2. This ambitious program reflects the Governments priority to move to a more sustainable transport model. This approach is important as investment in properly integrated and efficient inter- and intra-city public transport benefits not only our urban centres, but also acts as a growth enabler for wider regions. These aforementioned allocations of funding and projects will be crucial to both Limerick and the Mid-West in order to progress towards more sustainable methods of transport in the long run.

The transition towards these sustainable methods of transport will be essential in a number of contexts, including contributing to Irelands greenhouse gas emissions. Approximately 42% of Ireland's energy needs are associated with transport. As a significant contributor to Ireland's greenhouse gas emissions, we must invest in adopting transport options that are sustainable and will enable us to meet the challenging carbon reduction goals that have been set in Climate Action Plan 2019.

While sustainable transport must be a priority, further urban integration with the city centre will mitigate some of the scale required since development will be taking advantage of existing infrastructure.

Proposed cycle network as per draft LSMATS



Map Source: LSMATS

Proposed bus network as per draft LSMATS



Map Source: LSMATS

Recommendations:

- Prioritise sustainable and active travel to the University while taking advantage of the planned public transport infrastructure to further link Limerick city centre and the University of Limerick
- Examine any potential issues of increase vehicle congestion / use from two scenarios, with the LNDR proceeding and with LNDR not proceeding
- Investment in the SDZ and University Town must not deprioritise or detract investment from the city centre

7. Land, Business and Environmental Impact

Land Use

Private and Public Ownership



Existing UL Ownership (c.121 acres)

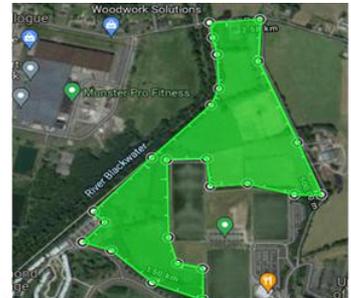


Private Ownership (c.107 acres)

* Mapping and size on this page are estimates from available data and may not reflect full detailed data

While plans have not been released yet regarding the SDZ and total land area. [The Irish Times](#) give some indication of where the site will be located and its size. From our own analysis, we can see there are two predominant ownerships on this area. University of Limerick are estimated to own c. 121 acres while c. 107 acres are estimated to be in private ownership.

Available Developable Land:

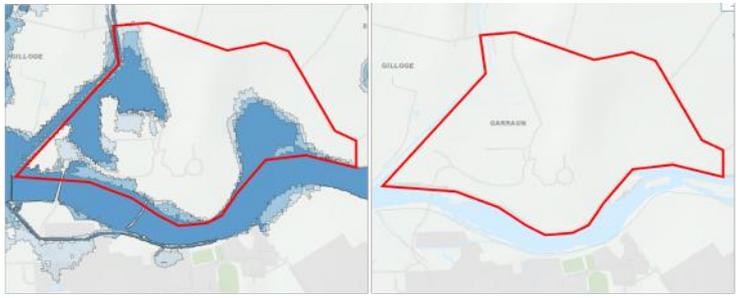


UL Developable Land (Plot 1 c. 33 acres)



UL Developable Land (Plot 2 c. 32 acres)

Flood Probability Developable Land:

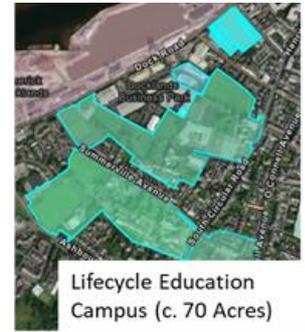
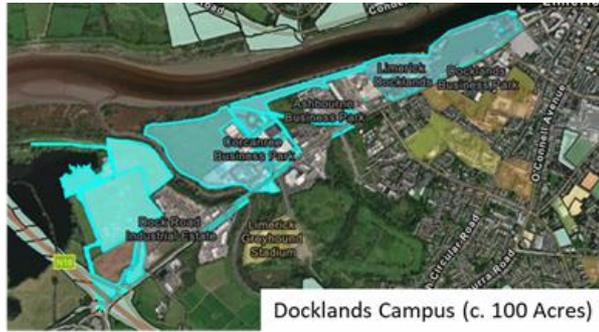
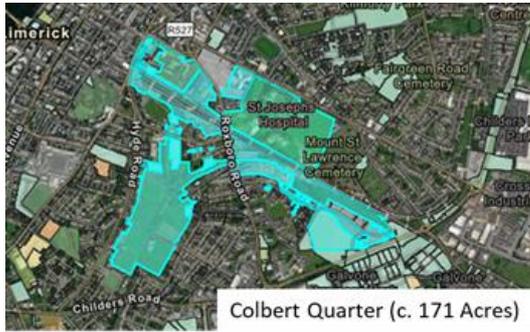


Legend: Low Probability (light blue), Medium Probability (medium blue), High Probability (dark blue), Site Boundary (red line). Map Source: OPW

Of the 121 acres that the University own on the North Bank, it appears that just c. 65 acres is available for development due to existing student accommodation, playing pitches, the Irish World Academy, the Health Sciences Building and School of Medicine. As per the OPW flood map, a significant portion of the proposed site has the probability of flooding.

There is ample state-owned land in the city centre where the University could collaborate with existing land-owners and occupiers to build out a campus – that roughly equates to existing developable land under the Universities ownership. Colbert Quarter, where the Land Development Agency are currently master planning the area, has c. 171 acres, the docklands has c. 100 acres and land where existing educational providers are in place have c. 70 acres. The educational lands could see the University partner with existing educational providers to create an all lifecycle educational campus with primary, secondary and third level education. Given its proximity to the docklands, the sites could be linked giving access to c. 170 acres. These sites are or will be well serviced by bus and cycle transport connectivity which will allow for any expansion to use sustainable infrastructure already in place. Furthermore, there is significant private ownership in the docklands area where infrastructure and housing providers may be open to collaborating on future plans.

Other sites of similar scale:



****Please Note the above images are only serve to show the availability of state-owned land in Limerick city centre and any decision to develop these lands must be done in conjunction with the owners, local authority, community and other stakeholders – for illustrative purposes only****

Commercial Vacancy and Impact on Clare and Limerick

Both Limerick and Clare have issues when it comes to existing commercial vacancy which could possibly be exacerbated by the introduction of new space. There are considerations for towns / areas in Clare if Clare is taking the approach of expanding closer to Limerick with the introduction of the SDZ. As per the latest [Geo Directory Commercial Vacancy Report](#), of the 21 towns surveyed in Munster, Clare based towns hold the top two positions. Kilrush has 26.2% commercial vacancy while Shannon has a commercial vacancy of 23.9% (Ennis at 18.1%). Overall, Clare has a commercial vacancy of 15.2% compared to the national average of 13.9%. There is a danger that if Clare expands its enterprise offering closer to the Limerick border with the SDZ that this could pull residential and business populations from these areas closer to the Limerick border which could exacerbate existing commercial vacancy issues.

The CCDP targets a growth of 3,500 within the SDZ which is greater than the targeted growth of Ennis (+2,705) and Shannon (+1,060). The targeted growth of the SDZ (+3,500) represents 30% of the population growth of Clare outlined within the CCDP.

Under the CCDP the SDZ and University Town would become the fourth largest town / settlement area in Clare, ahead of Sixmilebridge (3,026 total population), Ardnacrusha (1,351 total population), Kilrush / Cappa (2,844 total population), Newmarket-on-Fergus (2,177). In fact, the CCDP puts the growth of the SDZ at a greater level than the next 29 settlement areas combined (5 to 36 on table, next page). This analysis would drastically change if we were to use the 11,000 population projection for the SDZ as per the LSMATS and would represent an even more negative economic impact for settlements in Clare.

Equally, Limerick has issues with commercial vacancy which may be exacerbated with the introduction of the plan. Abbeyfeale in Co. Limerick has a commercial vacancy of 23.6%, Newcastle West has a commercial vacancy of 21.8%, and Limerick City has a commercial vacancy of 19.4% with the county of Limerick averaging 16.7% commercial vacancy compared to a national average of 13.9%. The introduction of the SDZ could pull the business and residential population from the city centre and other areas more towards the suburban location of the SDZ and exacerbate commercial vacancy issues further. The proposed SDZ has potential to negatively impact both Limerick and Clare.

Environmental Considerations

There are a number of environmental considerations already outlined in this document, but to reiterate; The proposed SDZ and University town are heavily contingent on a new road network (LNDR), which is likely to increase private car usage. If the LNDR does not go ahead, the alternative route behind the Kemmy Business School has the potential to flood and the existing road is likely not fit for purpose so will have to be improved. Furthermore, the proposed lands for the SDZ and University Town are also have the potential to flood causing further environmental implications. There needs to be a commitment to encourage investment in public and active transport models. The very nature of the proposed SDZ and the University Town is building on a greenfield site in a suburban location which will encourage urban sprawl and private car use. As per the NPF, dense and compact growth is one of the goals for Ireland to increase its sustainability. The development of the SDZ and University Town could cause the deprioritisation of investment in the city centre, particularly around sustainable transport and placemaking initiatives, which are designed to encourage a more sustainable way of life. Following on from this, we have seen an increase in hybrid workers choosing to work in towns and villages across the Mid-West, any decrease or deprioritisation of investment could cause these towns and villages to lose new residents.

Clare Population Change as per CCDP

Area	2016 Population	CCDP Growth to 2029	New Population as of 2029	% Growth	% of total Population Growth
1 Ennis	25,276	2,705	27,981	10.7%	23.2%
2 Shannon	9,899	1,060	10,959	10.7%	9.1%
3 Athlunkard	3,486	215	3,701	6.2%	1.8%
4 SDZ	379*	3,500	3,500	823.5%	30.1%
5 Sixmilebridge	2,669	357	3,026	13.4%	3.1%
6 Kilrush / Cappa	2,489	355	2,844	14.3%	3.1%
7 Newmarket-on-Fergus	1,968	209	2,177	10.6%	1.8%
8 Ennistymon / Lahinch	1,567	223	1,790	14.2%	1.9%
9 Killaloe	1,393	148	1,541	10.6%	1.3%
10 Ardnacrusha	1,351		1,351	0.0%	0.0%
11 Kilkee	1,155	123	1,278	10.6%	1.1%
12 Quin	984	85	1,069	8.6%	0.7%
13 Ballycannon North (Meelick)	917	50	967	5.5%	0.4%
14 Cratloe	926		926	0.0%	0.0%
15 Scariff / Tuamgraney	805	113	918	14.0%	1.0%
16 Lisdoonvarna	800	85	885	10.6%	0.7%
17 Parteen	834	50	884	6.0%	0.4%
18 Miltown Malbay	769	83	852	10.8%	0.7%
19 Tulla	759	81	840	10.7%	0.7%
20 Clonlara	684	142	826	20.8%	1.2%
21 Corofin	751	63	814	8.4%	0.5%
22 Kilkishen	592	50	642	8.4%	0.4%
23 Crusheen	534	46	580	8.6%	0.4%
24 Bunratty	375	79	454	21.1%	0.7%
25 Doonbeg	342	29	371	8.5%	0.2%
26 Ballyvaughn	327	29	356	8.9%	0.2%
27 O'Briensbridge	325		325	0.0%	0.0%
28 Kilfenora	290	25	315	8.6%	0.2%
29 Feakle	250	21	271	8.4%	0.2%
30 Inagh	247	21	268	8.5%	0.2%
31 Quilty	211	17	228	8.1%	0.1%
32 Whitegate	207	17	224	8.2%	0.1%
33 Liscannor	182	17	199	9.3%	0.1%
34 Mountshannon	170	15	185	8.8%	0.1%
35 Mullagh	146	12	158	8.2%	0.1%
36 Killimer	146	12	158	8.2%	0.1%
37 Clarecastle	-	-	-	-	-
38 Unserviced Large & Small Villages	54,991	1,600	56,591	2.9%	13.7%
Total	118,817	11,637	130,454	9.8%	

* SDZ population as per LSMATS, CCDP indicates no existing population

Data Source: CCDP

Recommendations:

- Re-evaluate population growth projections from Clare to direct more population growth to existing settlements to protect their local economies
- Examine the potential use of other state-owned sites closer to Limerick city centre where the university could collaborate with existing landowners and occupiers to build an extensive city centre campus
- Clarify the interaction of private land with regards to the overall SDZ plan. i.e., are talks in place to purchase the land, will it be a joint venture or strategic partnership, can the land fall under a compulsory purchase order and will there be any element of land value capture for private owners of land
- Prioritise playing pitches and other social infrastructure on the north side of the campus to ensure that they are not displaced as part of any future development plans and collaborate with existing third level institutions to focus on increasing the provision of education facilities in Limerick city centre as per various local plans
- Commission an independent study examining how the introduction may impact commercial vacancy in Clare and Limerick, paying close attention to the potential for the SDZ to pull residential and businesses closer to the SDZ. A steering committee made up of various stakeholders should oversee this independent piece of research

8. Collaboration, Stakeholder Engagement & Governance

The Land Development Agency is a commercial, State-sponsored body that has been created to both coordinate land within State control for more optimal use where appropriate and to act as a development agency role to aid local authorities. The core focus of the LDA is on the provision of affordable housing but as detailed in the [‘Housing for All’](#) strategy, it also has the capacity to enable the strategic assembly of land and/or the provision of necessary infrastructure in collaboration with public and private organisations.

Currently, the LDA is overseeing the Colbert Station Quarter project which seeks to deliver potentially 2,800 homes in addition to commercial and public spaces alongside sustainable transport options. The Colbert Quarter, in the heart of Limerick City, consists of almost entirely State-owned land with the potential to transform a key part of Limerick City into a vibrant, liveable, mixed-use and compact urban quarter. This project supports the vision of Project Ireland 2040 and its goal of improving urban spaces through the provision of housing and improving the quality of life in the area.

The LDA also have a responsibility to work with the Local Authority for the provision of housing and development through services outside of direct development, such as appraising sites, preparing masterplans, preparing planning submissions, make planning applications, obtain development consents, provision of infrastructure to service sites for housing and the provision of housing and carrying out of ancillary works as part of wider urban development. This is detailed in the [‘Land Development Agency Bill 2021’](#)

It is important to note in this context that there are potential synergies that could be developed in terms of the region's future. A key role the LDA must play here, is their focus on affordable housing but also the potential provision of services to aid other sites in Limerick.

It is important that there is a high level of stakeholder engagement throughout this process. In order for this project to serve the needs of all aspects of the region, it is essential that groups, stakeholders and citizens with diverse background are kept up to date and regularly consulted during the lifespan of the proposed SDZ. A steering committee made up of these people should be implemented.

This project is highly relevant to 2 counties, both Limerick and Clare. Cross county collaboration is required to ensure that forward progression for both counties is achieved and not a scenario where progress on one side is at the expense of the other.

Limerick Chamber welcomes the opportunity to engage with Clare County Council, Limerick City and County Council and the University of Limerick over this proposed SDZ and recommend implementing a steering group to collaborate and work with these organisations prior to the establishment of a DAC. Ensuring the needs of both areas is at the core focus of this development will require a high level of collaboration and provision of information over the course of this project. An online / print presence will also be crucial to provide quick and up to date information about any developments related to the project given both the ease at which information can be shared online and the level of engagement it creates with citizens.

Limerick Chamber would also like to take this opportunity to prioritise the development of the University of Limerick City Centre Campus in the collaborative approach outlined above. Limerick Chamber feels that this project should be established before any potential expansion of the university outside the City Centre.

Recommendations:

- Engage with the LDA around developing or assembling potential sites in Limerick City Centre that adhere to the Project Ireland 2040 strategy
- Establish a steering group for the development with representatives from a diverse range of backgrounds
- Ensure transparency with regular public updates, this should include publishing existing preliminary plans
- Ensure regular consultation with public and private organisations as well as students and staff of the university and also citizens of both counties
- Prioritise the development of the city centre campus utilising the collaborative approach outlined above

9. Conclusion

Overall Concerns

Limerick Chamber welcomes the ambitious nature of the implementation of the SDZ and the University Town. However, there are a number of core concerns regarding the plan;

- The possibility of detracting from the city centre
- The possibility of damaging growth of Clare
- Pushing other plans down on the list of priorities
- Making plans that are contingent on the expansion of road networks along with other environmental concerns
- The provision of affordable housing and housing plan
- Publishing of plans and transparency
- Adherence to national and local strategic plans

Because of this, Limerick Chamber feels that bringing forward the proposed SDZ and University Town plans are premature and should be brought forward at a time when there is a stronger city centre and region.

Adherence to National Policy

Limerick Chamber has concerns with the SDZ and University Town's adherence to local and national policy. Under the National Planning Framework, there is a clear strategy to develop in urban centres and focus population growth towards these centres. The proposed SDZ and University Town will likely have the opposite effect. It is Limerick Chamber's view that the University Town and SDZ does not adhere to the National Planning Framework.

Limerick Chamber's stance on projects that have the potential to deter city centre revitalisation has remained constant over the number of years. Previous plans to expand the Crescent Shopping Centre in [2019](#) were objected to by the Chamber given that the development would have exacerbated the declining state of Limerick City Centre and weaken efforts to re-establish it at the top of the retail hierarchy. Limerick Chamber have taken a similar stance regarding the [expansion](#) of the Castletroy Shopping Centre, also in 2019. [Both](#) Limerick City and County Council and An Board Pleanála's (ABP) rejected the expansion of Castletroy Shopping Centre with ABP [citing](#) five areas of concern, but

mainly its proximity to the city centre and also Casltetroy's place on the retail hierarchy (tier 2) with an overarching view that it could potentially damage the city centre:

"The Board is not satisfied that the proposed development would not have an adverse impact on the vitality and viability of the City Centre. The proposed development would, therefore, be contrary to the provisions of the relevant development plans for the area, to the Retail Planning Guidelines for Planning Authorities issued by the Department of the Environment, Community and Local Government in 2012 and to the proper planning and sustainable development of the area."

Limerick Chamber's hierarchy of priority is to revitalise Limerick city centre. With the pipeline of projects that currently exist, there is significant potential for a rebranding of Limerick City as a vibrant, attractive place to live, work and socialise all while contributing to the local economy providing the projects are delivered within an appropriate timeline. It is important to note that were this proposed SDZ situated in County or suburban Limerick as opposed to Clare with the same potential implications for Limerick City Centre, Limerick Chambers stance would remain the same.

Economic Driver of the Mid-West

The revitalisation of Limerick City Centre is crucial to Limerick City, the Mid-West region and Project Ireland 2040 as a whole. Limerick Chamber again wants to emphasise the importance of the university prioritising plans to develop a city centre campus. Prioritising a new SDZ just outside the city centre will only aid in pushing back the planned progress of revitalising Limerick City, where compact growth and a higher population density are sought and instead be subject to further urban sprawl and failure to achieve Project Ireland 2040's population projections. Improving the economic strength of Limerick City has the potential to benefit all of the Mid-West. However, implementing and SDZ on a greenfield site near the Limerick suburbs has the potential to exacerbate an already existing doughnut effect. It is important for the growth of the Mid-West that there is a strong central node at its core. In this regard, investment in the city centre must be prioritised and now moved back on the list in favour of investment in enabling infrastructure for the SDZ.

Impact on Clare

Limerick Chamber also has key concerns on how the proposed SDZ may impact commercial vacancy and residential population numbers in both Limerick and Clare and any plan brought forward must be mindful of the potential economic damage that this may cause to local areas.

As pointed out in section 7, the settlement and population projections prioritises the SDZ over most other settlements in Clare, with the SDZ capturing c. 30% of the total population growth. The CCDP growth population projections will make the SDZ the 4th largest settlement in Clare, behind only Ennis, Shannon and Athlunkard. The introduction of an SDZ has the potential to pull residents and thus businesses from the areas left behind and will exacerbate an already existing issue. The CCDP must prioritise growth in other parts of Clare.

Local Authority Funding Streams

There needs to be a review on local authority funding. The current system does not incentivise the implementation of compact growth and placemaking policies and local authorities may have the financial incentive to increase rate collection by developing large tracts of land in suburban locations. This is something Limerick Chamber has highlighted in the past through its [Future Limerick Report](#).

Looking to the Future

Limerick Chamber feels that through collaboration and consensus building that some of the issues outlined in this report may be mitigated, however, Limerick city centre must be prioritised for the betterment of the region. Limerick Chamber looks forward to continued engagement regarding the plans.



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