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05<sup>th</sup> April 2023

**Re: Submission on Local Economic and Community Plan for Limerick City and County 2023 - 2028**

Dear Sir / Madam,

HRA Planning Chartered Town Planning Consultants DAC has been retained by Shannon Foynes Port Company (SFPC) to make this submission on the development of the new Local Economic and Community Plan 2023 – 2028 (LECP) for Limerick.

### **Purpose of Submission**

In making this submission it is recognised that the LECP provides the social and economic vision for the county/city while the development plan provides for the proper planning and sustainable spatial development of Limerick. Both plans deliver a strategic and operational framework for integrated planning.

The recently adopted Limerick Development Plan 2022 – 2028 already recognises the importance of the Shannon Estuary and the potential of SFPC as a major economic driver in the region. It acknowledges that the Shannon Estuary's unique deepwater characteristics provides SFPC and the region with unique natural advantages and opportunities to develop into a major international shipping and economic hub with a focus on renewables. The Development Plan recognises that such energy and economic opportunities will be achieved by delivering on its Masterplan, 'Shannon Foynes Vision 2041' and the recently completed 'Vision 2041 Strategic Review 2022'.

It is the purpose of this submission to inform the new LECP for Limerick and to detail both the economic and community benefits that can arise by focusing investment and providing policy support



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for the Shannon Estuary and SFPC. In this regard it is noted that there are information gaps within the Draft Socio-Economic Statement as the renewable energy potential of the Shannon Estuary and the potential of SFPC to transform into a national freight and logistics hub is not recognised.

### **SFPC Economic Vision**

Shannon Foynes Port Company (SFPC) is one of the foremost economic drivers for the Mid-West Region. Its economic impact was quantified and published in the W2 economic impact assessment as supporting 3,648 full time jobs generating €193m in annual payroll. Annual trade handled by SFPC is valued at circa €8.5bn. SFPC has statutory maritime jurisdiction over the Shannon Estuary, the deepest watercourse in Ireland, and which is one of the deepest estuaries in the world. Overall company tonnage throughput for 2021 exceeded 10.97 million tonnes, a 16.1% increase on tonnage in 2020.

The vision for SFPC as outlined in its Masterplan ‘Shannon Foynes Vision 2041’ and the ‘Vision 2041 Strategic Review 2022’, is to position the Port as a key economic driver by enhancing and leveraging its asset base to accommodate offshore and onshore investment within and adjacent to its harbour. The thirty-year Vision 2041 masterplan was published in 2013 outlining the Port’s future objectives for the medium to long term. Areas such as Offshore Renewable Energy (ORE), alternative fuels production, unitised transport and organic growth affords SFPC significant potential. To realise this potential, SFPC has identified capital expenditure totalling €76 million to develop Port facilities in its five-year Strategic Plan 2022–2026, which is the short to medium plan to deliver the longer-term Vision 2041.

The Port is currently undertaking an ambitious €33 million development of Foynes Port, consisting of constructing a new quay to join the East and West Jetties, infill of land and provision of access, utilities and flood mitigation on Company lands (38 hectares) for developing a port related industrial park. This is the biggest capital development project undertaken by the Port in its history.

The LECP is an important tool to support the implementation of national and regional policy on economic development and local/community development. It is complementary to the Limerick Development Plan 2022 – 2028 which establishes the important statutory framework within which SFPC operates. In this context the existing LECP already recognises the potential of the Shannon Estuary in Economic Pillar Action 11.09. It seeks to *“facilitate the development of the Shannon Estuary as a key driver of economic development in the region by implementing the ‘Strategic Integrated Framework Plan for the Shannon Estuary’(SIFP) and support the work of the SIFP implementation group in achieving the objectives of the SIFP”*.

In its objective to support diversification, improved competitiveness and increase the number of jobs in the local economy, it is requested that the LECP also supports the implementation and delivery of the ‘Shannon Foynes Vision 2041’ and the ‘Vision 2041 Strategic Review 2022’, as already supported in the recently adopted Limerick Development Plan 2022 – 2028 and the Regional Economic and Spatial Strategy for the Southern Region, and the recently completed Vision 2041 Strategic Review 2022.

As the framework for the economic development and local/community development of the Limerick area, the LECP is the primary mechanism at local level to bring forward relevant actions arising from measures under other statements of Government policy. As a Tier 1 port and as a Core Corridor Port

under the EU's TEN-T network, it is critical that SFPC has adequate hinterland connectivity (road and rail) to support its planned growth. This is essential for achieving a fully integrated sustainable intermodal transport and logistics system, not only within the region, but also inter-regionally.

Irish Rail has commenced works on the reinstatement of the Limerick – Foynes rail line for freight purposes, which is hugely positive for port but could also be of benefit to the community if future upgrades are promoted for passenger travel. Planning consent has been granted by An Bord Pleanála for the Limerick to Foynes Road, but the decision is subject to judicial review. This is a crucial hinterland connection which is necessary to transform the Foynes terminal into a major national freight and logistics hub and should be identified as a proactive measure in the LECP to promote economic activity in the region. The road is already promoted in the National Planning Framework, the National Development Plan, the Department of Transport's updated National Investment Framework for Transport in Ireland. and in the Limerick Development Plan 2022 – 2028.

This integrated transport system will support not just current economic and social needs across the region, but new emerging industries and the population growth which that will bring. Accordingly, it is an action that needs to be identified in the LECP, to promote and support the economic development and the local and community development of the area.

### **Shannon Estuary Potential**

The overall goal of the LECP is to promote improved quality of life and well-being of people and communities in Limerick City and County. The purpose of the LECP is to bring together into a coherent high level framework the various strategies and operational plans already developed for Limerick / or in development for implementation.

The Programme for Government committed to supporting the Shannon Estuary and surrounding area through the establishment of a Taskforce to evaluate the potential of the area and to determine how this potential can be realised in terms of regional economic development across transport and logistics, manufacturing, renewable energy and tourism, with support from the Exchequer.

In line with the Government's Climate Action policy there is now a national focus on offshore wind energy development. Offshore floating windfarms in the Atlantic are central to this. Ireland has one of the world's leading wind resources, effectively an infinite supply of wind energy off the west coast. Shannon Foynes Port Company's Vision 2041 Strategic Review identifies upwards of 70GW which can be harnessed from the Estuary. The vision is for the Shannon Estuary to be the lead location for Atlantic offshore wind through the delivery of 2GW by 2030 and 30GW by 2050, satisfying both the domestic demand of the future economy and also export demand to Europe. The 2050 scenario of 30 GW of Floating Offshore Wind could attract direct and indirect investment of €60-90Bn if integrated with current and new downstream industrial and domestic usage.

By aligning two of our country's most significant natural resources, the 30GW-70GW of offshore wind off the west coast and the naturally occurring deep water maritime facilities of the Shannon Estuary, the region is presented with an unprecedented energy and economic potential. The objective is to create a marshalling port on the Shannon Estuary together with a value-added supply chain to facilitate the development of an Atlantic Offshore Renewable Energy hub. This marshalling port will require significant deep water quays and jetties, deep water anchorages and substantial zoned land for device and component manufacture and assembly.

While the Shannon Estuary is considered the best port to develop the supply chain for Floating Offshore Wind (FLOW), a new deepwater terminal at Foynes Island is required and a strategy for the development of the offshore grid (potentially along marine cable corridors) are critical and should be in place by 2028 in order to enable the sector to mobilise and meet net zero obligations by 2050. Whilst SFPC can seek to deliver the deepwater terminal on Foynes Island, the issue of grid capacity (at a network level) must be addressed through the revision of Eirgrid's Shaping Our Electricity Future.

The continuous challenge of grid capacity will restrict deployment for current and future projects if solutions are not provided by Eirgrid. The issue of grid capacity is an action that needs to be identified in the LECP, to promote and support the economic development and the local and community development of the area.

### **Societal Benefits**

A recent study estimates upwards of 5,000 jobs would be directly supported through the design, construction, and operation and maintenance of this pipeline up to 2050<sup>1</sup>. The potential for significantly more jobs and economic value could then be harnessed through increasing Ireland's share of the supply chain, and through new high value-add industries/jobs in agri-food, tech, and materials industries, as well as in emerging areas such as carbon neutral digital services, eHealth, transport and tourism.

The potential economic and societal opportunities are infinite. A whole ecosystem of research, development and innovation will be needed to complement sub-supply chains for the renewable energy sector. Investment by indigenous and multinational enterprises will be drawn by the offer of green energy supplies and an ecosystem that thrives on sustainability and innovation. Thousands of high-skilled job opportunities will be created, powering economic development across the broader Shannon Estuary Region. This will require public investment in key infrastructure such as sustainable transport, digital connectivity, and housing.

Upskilling the workforce and attracting new talent to the region will be critical in underpinning this transformational change. The establishment of a regional / cross-regional energy cluster for industry/agency/academia collaboration to research, grow and market the offshore wind sector will be required. Such a measure, which needs to be implemented locally should be identified as an objective in the LECP.

In addition, due to the scale of economic activity proposed together with the generation of tens of thousands of FTE, substantial supporting infrastructure such as housing and water capacity, to name some, will be required in the region. The LECP should include an objective to plan for supporting infrastructure.

### **Conclusion**

Both economic and community objectives need to be addressed in an integrated manner if the transformational vision set out by SFPC and supported by the Shannon Estuary Economic Taskforce,

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<sup>1</sup> Shannon Estuary Economic Taskforce Interim Report November 2022

is to be realised. The LECP for Limerick is the appropriate mechanism to deliver these integrated objectives.

One of the biggest challenges faced by communities in Limerick is climate change. Climate action is grounded in our net zero obligations by 2050 and on a national scale, the Shannon Estuary's natural attributes make it uniquely suited to develop the supply chain for FLOW and related green industries. Successful delivery of the identified offshore wind, green industry and logistics opportunities will be transformational for the Shannon Estuary, the region and the country with significant positive impacts for local economic development and local community development across Limerick. However, the LECP must also include as an objective, the requirement to plan for supporting infrastructure.

I trust that the submission provides sufficient information at this stage in the process. However, should you require clarification on any issue please do not hesitate to contact us.

Yours faithfully



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Mary Hughes MIPI  
Director HRA Planning chartered town planning consultants DAC