

Draft Caherconlish Local Area Plan 2023 – 2029

Section 20 (3)(c) Chief Executive's Report to the Elected Members on Submissions received during the Public Consultation on the Draft Local Area Plan

16th December 2022

**Limerick City and County Council
Forward Planning
Economic Development and Enterprise Directorate
Merchants Quay
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Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

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1.0 Introduction

This Chief Executive's Report outlines the submissions made following publication of the Draft Caherconlish Local Area Plan 2023 - 2029. The report sets out the Chief Executive's responses and recommendations to the issues raised and any amendments to the Draft LAP. The report is part of the statutory procedure for preparing a new Local Area Plan (LAP) as set out in Section 20 of the Planning and Development Act, 2000 (as amended).

The Draft Local Area Plan was placed on public display for a six week period between the 15th October 2022 to 28th November 2022 inclusive. A public consultation session was held on the 15th of November between 3pm to 7pm in the Millennium Centre in Caherconlish. 23 written submissions were received within the statutory timeframe.

1.1 Structure of the Report

Part A addresses each of the written submissions received within the statutory public display period. It includes the names of the individuals or bodies who made submissions, a summary of the issues raised, a response and recommendation of the Chief Executive on each of the issues raised.

Part B outlines the proposed amendments recommended to the text of the Draft LAP in response to the Chief Executive's recommendations on the submissions received. Any paragraph, policy or objective to be amended in the Draft LAP is reproduced in full with additional new text shown underlined in green and text to be deleted shown ~~struck through in red~~.

Part C of this report incorporates updates to the Environmental reports, including Strategic Environmental Assessment, Appropriate Assessment Screenings and an updated Strategic Flood Risk Assessment prepared in line with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) to support the plan making process.

1.2 Progress to date and next steps

The steps in the process of preparation of the Local Area Plan for Caherconlish are shown in the following table:

Date	Stage
6 th February 2022	Notification of commencement of Draft Caherconlish Local Area Plan 2023 - 2029.
6 th February – 21 st March 2022	First issues stage: Submissions were invited.
15 th October 2022 – 28 th November 2022	Draft Plan on public display: Public submissions invited during the statutory period.
The remaining stages of the Plan are as follows:	

16 th December 2022	Chief Executive's Report issued to the Elected Members of the Cappamore Kilmallock Municipal District for consideration.
January Municipal Meeting	Elected Members of the area shall consider this report and make or amend the Draft Plan.
February/March 2023	Material Alterations will be placed on public display for a further 4 weeks. Public submissions can only be made on the proposed alterations.
March 2023	Chief Executive's Report on submissions received on the Material Alterations issues to Elected Members for consideration.
April 2023	Final adoption of Plan by Elected Members, having considered the Chief Executive's Report on the submissions received on the Material Alterations.
June 2023	Plan comes into effect 6 weeks from the time of adoption of the Local Area Plan.

Following receipt of the Chief Executive's Report, the Members of Cappamore-Kilmallock Municipal District have up to 6 weeks in which to consider the contents of this report and the Draft LAP. Members may then make or amend the Plan. Should amendments be proposed which, would constitute material alterations to the Draft LAP, there is a further public display period (4 weeks) giving the public an opportunity to comment on the proposed amendments only. This is followed by the preparation of a second Chief Executive's Report to the Elected Members on any submissions received on the proposed amendments.

Members may then decide to make the LAP with or without the proposed amendments or with modifications to the proposed amendments, subject to the provisions of the Planning and Development Act, 2000 (as amended). The formal making of the LAP is by resolution of the Elected Members of the Cappamore-Kilmallock Municipal District. During the LAP process, the Council must consider the proper planning and sustainable development of the area, statutory obligations and any relevant plans and policies of the Government or any Minister of the Government.

PART A

2.0 Submissions, Responses and Chief Executive's Recommendation

2.1 Persons/ Bodies who made submissions within the statutory timeframe

CE Report Submission No.	Submission received from
Prescribed Bodies	
1	Office of the Planning Regulator (OPR)
2	Environmental Protection Agency (EPA)
3	Transport Infrastructure Ireland (TII)
4	Department of the Environment, Climate and Communications
5	Department of Housing, Local Government and Heritage (DHLGH)
6	Office of Public Works (OPW)
7	Irish Water (IW)
8	Department of Education
Other	
9	Caherconlish National School, Principal Patrick Ryan
10	Aislinn Crofton, Caherconlish National School, Parents Association
11	Planning, Placemaking and Environment Directorate, Limerick City and County Council
12	Cllr. P.J Carey & Cllr. Ger Mitchell
13	Michael Collins
14	Caherconlish Tidy Towns
15	Caherconlish Tidy Towns
16	Caherconlish Tidy Towns
17	Caherconlish Caherline Community Centre Council
18	Caherconlish AFC
19	MacCabe Durney Barnes on behalf of Glencore Zinc Ireland Ltd.
20	Caitríona McCarthy
21	AK Planning on behalf of Denis Lunn
22	Patrick Hourigan
23	Brid Moynihan

2.2 Submission Summaries, Chief Executive's Responses and Recommendations

1	Name/Group:	Office of the Planning Regulator (OPR) Ref: LCC-C166-CAHER-22
	Submission:	Response
	1. Overview <ul style="list-style-type: none"> - The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work put into the preparation of the draft LAP against the backdrop of an evolving national and regional planning policy and regulatory context and the need to balance competing pressures within an increasingly complex system. - The Office considers that the Draft LAP sets out an evidence-based strategy to guide development in Caherconlish in line with national and regional policy and welcomes the approach to land use zoning which focuses on creating a consolidated and accessible settlement in accordance with the 10-minute town concept and national and regional policy for compact and sustainable development. - The Office commends the planning authority for the inclusion of a detailed and clear settlement capacity audit and infrastructure assessment with costing estimates to inform the land use zoning objectives, consistent with the tiered approach to zoning under the National Planning Framework (NPF). - The Office notes the designation of five Opportunity Sites within the town, with the potential to enhance the public realm, amenity and blue green infrastructure of the area as well as accommodating much needed housing consistent with compact growth. 	1. Overview Noted.

<p>2(i) Consistency with the Regional, Spatial and Economic Strategy</p> <ul style="list-style-type: none"> - The Office considers the Draft LAP to be generally consistent with the regional policy objectives of the RSES for the Southern Region. <p>2(ii) Consistency with Development Plan and Core Strategy</p> <ul style="list-style-type: none"> - The Office considers the housing targets, the overall land use zoning objectives and the policies and objectives of the Draft LAP to be generally consistent with the Development Plan and its Core Strategy. <p>2(iii) Compact Growth, Zoning and Tiered Approach to Zoning</p> <ul style="list-style-type: none"> - The Office commends the planning authority for carrying out a detailed settlement capacity audit and infrastructure assessment for the LAP, including costings estimate for the servicing of the land, to inform the land use zoning objectives, and the Draft LAP. This is consistent with the Development Plans, Guidelines for Planning Authorities (2022) (Development Plan Guidelines) and with NPO 72a – NPO 72c tiered approach to zoning. The Office also considers that the Draft LAP and its land use zoning objectives are generally consistent with national and regional objectives for compact growth, NPO 3c and RPO 35. <p>3(i) Regeneration</p> <ul style="list-style-type: none"> - The Office welcomes the preparation of a town centre health-check to inform the Draft LAP, generally consistent with the approach recommended in the Town Centre First - A Policy Approach for Irish Towns (2022). In addition to a c. 4% vacancy rate for residential properties, 	<p>2(i) Consistency with the Regional, Spatial and Economic Strategy</p> <p>Noted.</p> <p>2(ii) Consistency with Development Plan and Core Strategy</p> <p>Noted.</p> <p>2(iii) Compact Growth, Zoning and Tiered Approach to Zoning</p> <p>Noted.</p> <p>3(i) Regeneration</p> <p>Noted, see response to Recommendation 1 below.</p>
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	<p>the submission notes that the health check reported a vacancy rate 30% for commercial properties, which is well above the national average rate.</p> <ul style="list-style-type: none"> - The submission notes however, that it would be appropriate for the LAP to include specific active land management objectives, policies, measures, and/or actions tailored to address the particular and concentrated pattern of vacancy evident in this settlement, having regard to Objective CGR 04 Active Land Management of the Development Plan. - The submission also outlines that in the case of Caherconlish, the Office suggests that measurable targets for the resolution of vacancy should be included in the LAP, which can be addressed through monitoring provisions in Chapter 11. - The submission refers to Policy ED P4(c) whereby ground floor uses within the village centre are restricted to retail noting this is unduly restrictive and may be counterproductive to the revitalization and regeneration of the village centre and so inconsistent with NPO6, NPO7, RPO43 and Town Centre First policy. <p>Recommendation 1 – Regeneration Having regard to NPO6 and NPO 7, RPO 34, to Objective CGR 04 of the Limerick Development Plan 2022-2028, and to Town Centre First, A Policy Approach for Irish Towns (2022) - the planning authority is required to:</p> <p>(i) Include specific active land management objectives, policies and measures or actions tailored to address the particular and concentrated pattern of commercial vacancy in Caherconlish;</p>	<p>Recommendation 1 – Regeneration The health check survey carried out for Caherconlish in January 2022 found that 30% of the commercial properties were vacant within the settlement boundary (9 units in total), of which 7 units are located within the Village Square. The Council has a proactive regime in place, which aims to tackle the issues of dereliction and vacancy throughout Limerick. A dedicated team within the Council work on a continuous basis seeking to reduce vacancy and dereliction, through the various tools available, including compulsory purchase orders of vacant and underutilised</p>
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	<p>(ii) Include measurable targets for the reduction of commercial vacancy for the plan period, the implementation of which can be monitored under the provisions in Chapter 11 of the Draft LAP; and</p> <p>(iii) Omit or amend objective ED P4(c) to ensure that the LAP does not prevent or discourage the conversion of vacant commercial premises into residential properties, including at ground floor level.</p> <p>4. Transport and Accessibility</p> <ul style="list-style-type: none"> - The Office welcomes the policies and objectives in the Draft LAP, which seeks to support and facilitate integrated multi-modal and accessible public transport and to maintain and expand active travel infrastructure in the town. - In particular, the Office supports Objective SMT O3, which seeks to implement the Safe Route to Schools Programme, the Amenity and Sustainable Transport Map which sets 	<p>properties. The Council will continue to monitor vacancy in Caherconlish and work with the relevant stakeholders to address issues that exist.</p> <p>Additional supportive text and inclusion of an associated objective in the <i>Chapter 4 Section 4.3 Town Centre Health Check</i> will be included to seek to address dereliction and vacancy and supporting urban regeneration in the village centre.</p> <p>(ii) A health check survey will be carried out as part of the monitoring and evaluation process of the Local Area Plan on an ongoing basis to monitor vacancy in Caherconlish. <i>Table 11.1: Draft Caherconlish Local Area Plan – Plan Actions</i> to include a new action to undertake a further Health Check Survey during the life time of the Plan.</p> <p>(iii) In line with the Limerick Development Plan, ground floor uses are considered as potentially pivotal in creating a sense of vibrancy. It is acknowledged that residential or other uses, aside from retail allow for revitalisation and regeneration of village centres. Section 4.4 Retail Strategy and Objective ED P4(c) will be amended to support reoccupation of vacant units.</p> <p>4. Transport and Accessibility</p> <p>Noted.</p>
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	<p>out a strategy for new and enhanced pedestrian links within the town.</p> <ul style="list-style-type: none"> - The Office commends the approach taken to monitor these objectives against national and regional policy through clear measureable actions, as set out in Chapter 11 of the Draft Local Area Plan and is satisfied that the Policies and Objectives are in accordance with Regional Spatial Economic Strategy and the National Planning Framework . <p>5. Economy and Employment</p> <ul style="list-style-type: none"> - The submission notes that the OPR supports the proposed enterprise and employment zoning to provide for local employment opportunities within the town. This zoning has the potential to generate an employment base for the settlement, in accordance with NPO 11. - The Office also welcomes Objective IU 07, which seeks to, amongst others, facilitate improvements of telecommunication, broadband, electricity and gas networks infrastructure. <p>6. Flood Risk Management</p> <ul style="list-style-type: none"> - The submission notes that the Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) carried out by the Planning Authority, including the carrying out of plan-making justification tests. - The submission outlines that the SFRA comprises only a Stage 1 assessment, does not have regard to the three-stage flood risk assessment process set out in the Flood Guidelines and does not, therefore, adequately assess the potential flood impact within areas at risk of flooding in Caherconlish. - The submission advises that separate justification tests be provided for Village 	<p>5. Economy and Employment</p> <p>Noted.</p> <p>6. Flood Risk Management</p>
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	<p>Centre and Existing Residential land use zones, as distinct land use classes that are likely to have different levels of vulnerability to flood risk.</p> <ul style="list-style-type: none"> - The submission notes that having regard to criteria 3 of the Justification Test, the SFRA should indicate how flood risk will be managed within the town and future development will not cause unacceptable adverse impacts elsewhere. It should also specify the structural or non-structural measures necessary to accommodate future development in existing developed areas at risk of flooding that pass the justification test and provide information on how any identified residual flood risk would be managed having regard to Circular PL 2/2014. - The submission requests that Objective IU O4 be further amended to reference any necessary flood risk mitigation measures identified in the revised justification tests and to limit development on such lands to water compatible uses only. <p>Recommendation 2 - Flood Risk Management</p> <p>The OPR requests having regard to NPO 57 of the NPF and RPO 116 of the RSES, and the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines), as amended by Circular PL 2/2014, the planning authority is required to:</p> <p>(i) Carry out a revised strategic flood risk assessment for the Draft LAP, having regard to the detailed provisions of the Flood Guidelines, including:</p> <ul style="list-style-type: none"> a) Stage 3 Detailed Flood Risk Assessment based on appropriate and up to date flood risk mapping; 	<p>Recommendation 2 – Flood Risk Management</p> <p>(i)An updated Strategic Flood Risk Assessment has been carried out in accordance with the Flood Guidelines.</p> <p>The updated Strategic Flood Risk Assessments incorporate flood justification tests for all relevant land use zoning objectives.</p>
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	<p>b) Separate plan-making justification tests for 'Village Centre' and 'Existing Residential' land use zoning objectives;</p> <p>c) Specify any structural or non-structural measures that are necessary to accommodate future development on existing developed lands that have passed the plan-making justification test and provide information on how any identified residual flood risk would be managed.</p> <p>(ii) Amend Objective IU O4 to include reference to the mitigation measures provided, in accordance with the Justification Tests;</p> <p>(iii) Limit future development of land zoned 'Agriculture' within Flood Risk Zone A or B, to water compatible uses only. The planning authority is advised to liaise with the OPW Flood Risk Management unit, in addressing this recommendation.</p> <p>7. Environment, Heritage and Amenity</p> <ul style="list-style-type: none"> - The Office welcomes the inclusion of objectives in relation to the protection of the town's built heritage, particularly with regard to the inclusion of a Record of Protected Structures and the inclusion of a Record of Monuments and Places for the town. - The Office is satisfied that the policies and objectives set out in the Draft LAP are consistent with NPO 17 and RPO 194, as it relates to the protection of cultural assets and heritage areas. - The Office also acknowledges the objectives set out in chapter 5 and welcomes the inclusion of Opportunity Sites 1, 2 and 3, which seek to improve public realm and amenity of the village together with enhancements to the blue – green infrastructure network. 	<p>(ii) Amend Objective IU O4 to limit future development of lands within Flood Risk Zone A/B in accordance with the plan-making Justification Tests in the SFRA</p> <p>(iii) Amend Chapter 10 Land Use Zoning Objective for Agriculture that future development of land zoned Agriculture within Flood Risk Zone A or B, will be limited to water compatible uses only. The Local Authority will continue to work with the OPW as required.</p> <p>7. Environment, Heritage and Amenity</p> <p>Noted</p>
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Chief Executive's Recommendation:

1-2. No change.

3(i) Insert the following text into Section 4.3 Town Centre Health Check:

Limerick City and County Council have been proactively working to address vacancy and dereliction across Limerick. The active land use management tools available to the Council are underpinned by Derelict Sites Act, 1990 (as amended), the Urban Regeneration and Housing Act 2015 (for vacant sites), Residential Zoned Land Tax and key Government policies such as Town Centre First, Our Rural Future, and Housing for All. In addition, the Council is committed to working with property owners to reactivate long-term vacant homes and unused properties for sustainable productive use and support and promote public funding opportunities such as Croí Cónaithe.

The Council has a proactive regime in place, which aims to tackle the issues of dereliction and vacancy throughout Limerick. A dedicated team within the Council work on a continuous basis seeking to reduce vacancy and dereliction, through the various tools available, including compulsory purchase of vacant and underutilised properties.

The Dereliction, Vacancy and Re-Use Team of the Council will continue to engage with property owners to advise on remedial measures and give guidance on schemes and supports available to bringing vacant and derelict properties back into productive use.

Insert a new objective into Section 4.3 Town Centre Health Check

Objective ED 04: Active Land Management: it is an objective of the Council to:

(a) Support and facilitate the reuse and revitalisation of derelict, vacant and underutilised sites and disused buildings throughout Caherconlish for residential, economic, community and leisure purposes.

(b) Promote and facilitate the re-use of under-utilised or vacant lands/buildings in Caherconlish through the active land management mechanisms such as the Derelict Sites Act, 1990 (as amended), the Urban Regeneration and Housing Act 2015 (for vacant sites), Residential Zoned land Tax and also through key Government guidance policies such as Town Centre First, Our Rural Future, and Housing for All and any replacements thereof. The Council will continue to engage with property owners to advise on remedial measures and give guidance on schemes and supports available to bringing vacant and derelict properties back into productive use.

3(ii) Insert a new action into Chapter 11-Monitoring and Evaluation Table 11.1: Draft Caherconlish Local Area Plan – Plan Actions as follows:

Undertake a further Health Check Survey within the lifetime of the Plan in order to monitor commercial and residential vacancy throughout Caherconlish.

3(iii) Amend text in Section 4.4 Retail Strategy as follows:

Remove text in Section 4.4 Retail Strategy as follows:

~~Development proposed on the ground floor in the village centre will be restricted to shopping and related services with active frontages to address the street~~

	<p>Amend Objective ED P4: Retail Development (c) as follows:</p> <p>(c) Ensure that <u>Encourage</u> proposals at ground floor level within the village centre are restricted to <u>used for</u> retail uses. <u>Where viable retail cannot be sustained, then alternative uses for the property/unit will be considered</u>. Storage use will not be permitted as the primary use in this location;</p> <p>5. No change.</p> <p>6(i) Refer to Part D Strategic Flood Risk Assessment</p> <p>6(ii) Add Objective IUO4(e) as follows: <u>(e)Ensure future development of lands within Flood Risk Zone A/B is in accordance with the plan-making Justification Tests in the SFRA.</u></p> <p>6(iii) Include the following text in Chapter 10 Land Use Zoning Objective and Purpose for Agriculture to <u>Limit future development within Flood Risk Zone A/B to water compatible development.</u></p> <p>7. No change.</p> <p>SEA/AA Response:</p> <p>The changes outlined in the Draft Plan are positive alterations, which will provide clarification and compliance with national and regional policy.</p> <p>In relation to Town Centre First, the proposed changes regarding active land management will address the pattern of commercial vacancy in Caherconlish and support urban regeneration of the village centre by supporting and facilitating the reuse of derelict, vacant and underutilised sites, accordingly supporting compact growth.</p> <p>The Local Authority have updated the Strategic Flood Risk Assessment in line with the Flood Guidelines in order to safeguard areas of risk of flooding from inappropriate development.</p>
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2	Name/Group:		Environmental Protection Agency Ref: LCC-C166-CAHER-1	
	Submission:		Response	
	1. The Environmental Protection Agency (EPA) promotes the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocates that the key environmental challenges for Ireland are considered and addressed, as relevant and appropriate to the Plan.		1. Noted.	
	2. The EPA's guidance document "SEA of Local Authority Land Use Plans – EPA Recommendations and Resources", assists Local Authorities to incorporate relevant		2. SEA of Local Authority Land Use Plans – EPA Recommendations and Resources has been used to inform the SEA process.	

<p>recommendations as relevant and appropriate to the Plan.</p> <p>3. The Council should ensure that this Local Area Plan is consistent with proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required, to service any development proposed and permitted during the lifetime of the Plan.</p> <p>4. The Plan should align with national commitments on climate change mitigation and adaption, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaption plans.</p> <p>The Plan shall align with key relevant higher level plans and programmes and be consistent with the requirements of the National Planning Framework and Regional Spatial and Economic Strategy.</p> <p>5. The recommendations, challenges and key of the State of the Environment Report <i>Ireland's Environment – An Integrated Assessment 2020 (EPA, 2020)</i> should inform the Plan.</p> <p>6. The EPA outlines its resources available online to assist the preparation of LAP's including; the Environmental Sensitivity Mapping (ESM) Web Tool, the EPA SEA WebGIS Tool, the EPA WFD Application, and the EPA AA GeoTool.</p> <p>7. Future Amendments to the Plan: Any future amendments to the Plan should be screened for likely significant effects, in accordance with the criteria set out in Schedule 2A of the SEA Regulations (S.I. No. 436 of 2004).</p>	<p>3. Noted, the availability of services has been considered in determining the land use zonings for the Caherconlish Local Area Plan as outlined in the Settlement Capacity Audit – Tiered Approach to Zoning in Chapter 10 of the Draft Local Area Plan.</p> <p>4. The Draft LAP has been prepared and aligns with all relevant legislation, including Climate Commitments. Objective I O1 Spatial Planning ensures the provisions of the Draft LAP align with the higher-level spatial plans.</p> <p>5. Noted.</p> <p>6. Noted.</p> <p>7. Any future amendments will be screened for SEA as part of the preparation process.</p>
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	<p>8. Environmental Authorities: Prior to making the SEA determination, the Planning Authority should consult with the Environmental Protection Agency; the Minister for Housing, Local Government and Heritage; the Minister for Environment, Climate and Communications; the Minister for Agriculture, Food and the Marine; and any adjoining planning authority, whose area is contiguous to the area of the planning authority, which prepared the proposed plan, proposed variation or local area plan.</p>	8: Noted.
	Chief Executive's Recommendation:	
	1-8. No Change	
	SEA/AA Response: No change	

3	Name/Group:	Transport Infrastructure Ireland Ref: LCC-C166-CAHER-2
	Submission:	Response
	Transport Infrastructure Ireland (TII) has no specific observations to make in relation to the planning referral for the Local Area Plan for Caherconlish.	Noted.
	Chief Executive's Recommendations:	
	No Change	
	SEA/AA Response: N/A	

4	Name/Group:	Department of Environment, Climate and Communications Ref: LCC-C166-CAHER-19
	Submission:	Response
	Heating - The Department of Environment supports the aim to reduce carbon footprints, namely by minimising energy intensive inputs, improving energy performance ratings of existing and new buildings and by acknowledging the policies and provisions of the NPF in	Heating The Draft LAP aligns with the Limerick Development Plan 2022 – 2028, and policy support is provided in this plan for District Heating networks. It is not considered necessary to reiterate policies and objectives contained in the Development Plan, in lower tier plans, as in assessing proposals for

	<p>relation to Climate Adaptation and Measures.</p> <ul style="list-style-type: none"> - The submissions suggests that the Draft LAP should include the following policy <i>“District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Irelands GHG emissions.”</i> This policy objective is in accordance with the Strategic Outcomes in the NPF and policy in the RSES for the Southern Region. <p>Waste Management</p> <ul style="list-style-type: none"> - DECC has suggested that the County Council should consult directly with their respective <i>‘Regional Waste Management Planning Office’</i> before publishing final plan. 	<p>development, both the Development Plan and Local Area Plan will be considered in tandem.</p> <p>Waste Management</p> <p>The Council has engaged with the Regional Waste Management Planning Office and have no comment to make.</p>
Chief Executive’s Recommendation:		
No change		
SEA/AA Response: N/A		

5.	<p>Name/Group:</p>	<p>Department of Housing, Local Government and Heritage Ref: LCC-C166-CAHER-7</p>
	<p>Submission:</p> <p>1. Archaeological Heritage</p> <p>Overall, the Department concurs with the objectives as set out in the Draft Plan for the archaeological heritage (namely objective CH O6). The Department advises that another objective take cognisance of and reflects new and previously unrecorded as set out in the sites and monuments record (SMR), which is updated regularly and refers to Objective EH O37 Preservation of unrecorded/ newly discovered Archaeological Heritage. The submission notes that Caherconlish is a significant historic town, with origins from the Medieval period.</p>	<p>Response</p> <p>1. Archaeological Heritage</p> <p>The Council recognise the historic importance of Caherconlish and will continue to engage and work with the Department of Housing, Local Government and Heritage to safeguard the historic importance of the village. The National Monuments Map provided for in the Draft LAP identifies national monuments and Zone of Associated Notification. It is recommended to amend Section 8.4 to provide a definition of archaeology and archaeological heritage as included in the Limerick Development Plan 2022-2028.</p> <p>The Draft LAP aligns with the Limerick Development Plan 2022-2028, Section 6.5.1</p>

<p>The submission strongly recommended that the Local Area Plan cross-references the Limerick Development Plan 2022–2028 and includes information around the definition of archaeology and archaeological heritage as included in the Limerick Development Plan.</p> <p>The submission recommends that the following be included as an over-arching objective for the protection of the archaeological heritage:</p> <p>It will be an objective of the planning authority to protect in an appropriate manner all elements of the archaeological heritage and other features of the following categories:</p> <ul style="list-style-type: none"> a) Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage (DHLGH); b) Monuments and Places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994; c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987; d) National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and National Monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority; e) Archaeological objects within the meaning of the National Monuments Acts; f) Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer/Wreck Inventory of Ireland Database maintained by the National Monuments Service of the 	<p>Archaeological Heritage. The policy objective outlined is contained in the Limerick Development Plan 2022-2028. It is not considered necessary to reiterate policies and objectives contained in the Development Plan in lower tier plans, as in assessing proposals for development, both the Development Plan and Local Area Plan will be considered in tandem.</p>
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<p>Department of Housing, Local Government and Heritage;</p> <p>g) Where, under Section 3 of the National Monuments (Amend.) Act 1987 a place on, in or under the seabed (of the territorial waters) or land covered by water where a wreck or an archaeological object lies or formally lay;</p> <p>h) Archaeological features not as yet identified but which may be impacted on by development.</p> <p>In addition, the submission notes that the planning authority shall take full account of, and be guided by, national policy on the protection of the archaeological heritage as set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999).</p> <p>2. Objectives in the protection of archaeological heritage:</p> <p>The submission outlines that the planning authority shall protect the archaeological heritage through ensuring preservation in-situ or preservation by record, as appropriate, with preservation in-situ being the first option to be considered being presumed to be the preferred option.</p> <p>The submission notes the following recommended further objectives and policies to protect the archaeological heritage for inclusion:</p> <ul style="list-style-type: none"> - To protect and enhance archaeological monuments, historic wrecks and archaeological objects and their settings and amenities, having particular regard to the importance of historic graveyards, national monuments in the ownership/guardianship of the Minister for Housing, Local Government and Heritage or the Local Authority; - To promote and facilitate appropriate forms of access (including but not limited to educational and disabled access for 	<p>2. Objectives in the protection of archaeological heritage:</p> <p>The Draft LAP aligns with the Limerick Development Plan 2022-2028, Section 6.5.1 Archaeological Heritage. The policy objective outlined is contained in the Limerick Development Plan 2022-2028. It is not considered necessary to reiterate policies and objectives contained in the Development Plan in lower tier plans, as in assessing proposals for development, both the Development Plan and Local Area Plan will be considered in tandem.</p>
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	<p>example) to archaeological monuments and historic wrecks;</p> <ul style="list-style-type: none"> - To ensure that all aspects of archaeological heritage and underwater cultural heritage, in all environments, are considered in the development process - To promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation; - To promote early and comprehensive public access to the results of archaeological excavations carried out as a result of development or conservation projects; - To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage; - Developments will not be permitted which would result in the removal of archaeological monuments with above ground features/surface expression; - If preservation in-situ cannot be achieved, or can only be achieved in-part, then preservation by record of the archaeological heritage will be required; - To secure the preservation in-situ of historic wrecks, and where this is not possible, their preservation by record; - To ensure that provision is made in the planning process ensuring the preservation in-situ of significant medieval masonry remains found during the course of a development; - To secure the preservation in-situ of surviving above-ground urban medieval and early modern structures, by ensuring that permission for a development does not result in the loss of the remains of such structures which may survive within 	
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	<p>buildings which are, or appear to be, of later date;</p> <ul style="list-style-type: none"> - To secure the preservation in-situ of significant examples of industrial, military and nautical/maritime heritage that form part of our post-medieval archaeological heritage - To preserve the setting and amenity of all archaeological monuments, with particular regard for upstanding monuments; - To preserve means of access to monuments currently accessible to the public and to develop further and better access to monuments; - To retain the existing street layout, historic building lines, and traditional plot widths where these derive from medieval or other origins within towns or villages; - To protect historic graveyards, including through the avoidance of extensions to them where this would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity; - To ensure that historic graveyards in the ownership or care of the Local Authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards; - To ensure that landscapes of particular historic or archaeological interest or significance are appropriately considered as part of a landscape character assessment, and to ensure the continued preservation of the character, interest and amenity of such landscapes; - To ensure that in appropriate cases developments include as a long-term measure appropriate interpretive 	
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	<p>material regarding the archaeological features identified or uncovered in the course of development or pre-development work, whether or not such features have been preserved in-situ or are themselves presented;</p> <ul style="list-style-type: none"> - To ensure that all signage placed at or near archaeological monuments is appropriate in design, form, and accuracy of content; - To support the incorporation of monuments into designated open spaces and public amenity spaces, provided this is done in a manner compatible with the protection and proper management and conservation of the monument in question, in particular through ensuring that such monuments are not left vulnerable. <p>3. Recommended Development Control Objectives:</p> <p>The submission provides additional recommended development control objective and policies including the following:</p> <ul style="list-style-type: none"> - That proposed developments which may, due to their location, size, or nature, have implications for elements of the archaeological heritage (including the underwater cultural heritage) be subject to an archaeological assessment, which should in general be carried out before any grant of permission. (includes lists of types of developments) - Proposed developments in areas of the marine environment or inland waterways for which there are no located wrecks may be considered to be areas of high archaeological potential due to the number of historic ship losses recorded for these areas over time or areas that have a record for locations of archaeological objects in the past, such as those from the River Suck. Therefore, 	<p>3. Recommended Development Control Objectives:</p> <p>The Draft LAP aligns with the Limerick Development Plan 2022-2028, Section 6.5.1 Archaeological Heritage. The policy objective outlined is contained in the Limerick Development Plan 2022-2028. It is not considered necessary to reiterate policies and objectives contained in the Development Plan in lower tier plans, as in assessing proposals for development, both the Development Plan and Local Area Plan will be considered in tandem.</p>
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	<p>developments in riverine, lacustrine, intertidal and sub-tidal environments of archaeological potential should be subject to an underwater archaeological impact assessment, which should in general be carried out before any grant of permission;</p> <ul style="list-style-type: none"> - To ensure that archaeological assessment is carried out in accordance with relevant policies and standards, in particular those set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999) and the advice in particular cases of the Department of Housing, Local Government. - To ensure that all planning applications for developments of categories set out above are referred to the Department of Housing, Local Government and Heritage, through its Development Applications Unit, - All such assessments are carried out by professionally qualified and experienced personnel; - That permission for proposed development will be refused where the development cannot be carried out in a manner compatible with the protection of the archaeological heritage as provided for in the policies and objectives contained in the development plan and in relevant national policies, in particular the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999); - That where permission is granted for proposed development such grants of permission, will contain appropriate conditions to secure the protection of the archaeological heritage, either by preservation in-situ or, where impact 	
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	<p>cannot be avoided, by way of preservation by record</p> <ul style="list-style-type: none"> - That where preservation in-situ is required as a condition, further conditions may require appropriate immediate and long term conservation and management of the archaeological features in question and long term monitoring of the effectiveness of conservation measures, with appropriate steps required to be taken in the event conservation measures are proving ineffective; - That where preservation by record is required as a condition, such conditions will further require preparation of appropriate follow-up reports, analyses and publications and the conservation as necessary of archaeological material and objects recovered during the archaeological excavations as carried out; - That where permission is granted conditions may require presentation to the public of archaeological features preserved in-situ on the site, where practicable, and/or provision of interpretive material at the site (including on a permanent basis) whether or not any features have been preserved in-situ; - That where archaeological excavation is required as a condition of permission, further conditions may be imposed requiring the provision of public access to such excavations, subject to appropriate safeguards; - That where conditions are imposed for the protection or preservation of the archaeological heritage, these will make clear that the costs of implementing these are to be borne by the developer. <p>4. Climate Change The following further recommendations are made for climate change policy objectives:</p>	<p>4. Climate Change The Council will be guided by the Government policy 'Built and Archaeological Heritage –</p>
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<ul style="list-style-type: none"> - To promote awareness and the appropriate adaptation of Ireland's built and archaeological heritage to deal with the effects of climate change; - To identify the built and archaeological heritage in Local Authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the local area plan and county development plan; - To undertake climate change vulnerability assessments for the historic structures, sites and wrecks in its area; - To develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage (including underwater cultural heritage) in its area; - To develop resilience and adaptation strategies for the built and archaeological heritage (including underwater cultural heritage) in its area; - To develop the skills capacity within the Local Authority to address adaptation/mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works <p>5. Overview of policy context:</p> <ul style="list-style-type: none"> - Key national policy documents pertaining to archaeology and built heritage include Heritage Ireland 2030, the Climate Change Sectoral Adaptation Plan for the built and Archaeological Heritage, 2019, the Built Vernacular Strategy, 2021 and the National Policy on Architecture. The Department seeks where possible the including of the policies and objectives of 	<p>Climate Change Sectoral Adaption Plan', 2019 Department of Culture, Heritage and the Gaeltacht. Objective CH O1: Climate Change will be amended to include a new objective which will <u>g) promote the appropriate adaption of built heritage to assist in addressing the effects of climate change.</u></p> <p>5. Overview of policy context:</p> <p>The Draft LAP aligns with the Limerick Development Plan 2022 – 2028, Section 6.5.1 Archaeological Heritage. Reference to key national policy documents pertaining to archaeology and built heritage is made in the Development Plan. It is not considered necessary to reiterate these plans in lower tier plans, as in assessing proposals for development, both the Development Plan</p>
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<p>these documents into future development plans.</p> <ul style="list-style-type: none"> - The Programme for Government supports the 17 No. Sustainable Development Goals adopted by the United Nations and built on the principle of 'leaving no one behind'. Cultural and natural heritage as part of the wider built environment is represented by Goal No. 11—make cities and human settlements inclusive, safe, resilient and sustainable. - Targets to be achieved are wide-ranging including the adoption and implementation of integrated policies and plans towards 'inclusion, resource efficiency, mitigation and adaptation to climate change, resilience to disasters and implement holistic disaster risk management at all levels', whilst targets for cultural and natural heritage are focused on strengthening its protection - The Department welcomes the opportunity for making cultural heritage more accessible and better integrated with tourism and recreational opportunities in the county and supports the integration of heritage through the implementation of blue and green infrastructural projects. 	<p>and Local Area Plan will be considered in tandem</p> <p>The Council will continue to liaise with relevant stakeholders in the development management process and comply with national policy in relation to protection of archaeology.</p>
<p>Chief Executive's Recommendation:</p>	
<p>1. Add the following text to Section 8.3.1 Archaeological Heritage: <u>Archaeological heritage is comprised of all material remains of past societies with the potential to add our knowledge of such societies.</u></p> <p>2-3. No change.</p> <p>4. Add the following text as part (g) to Objective CH O1 in Chapter 8 as follows: <u>(g)Promote the appropriate adaption of built heritage to assist in addressing the effects of climate change.</u></p> <p>5. No change.</p>	
<p>SEA/AA Response:</p> <p>The inclusion of climate considerations for architectural heritage and additional biodiversity policy is considered appropriate. It increases the range of policy responses to climate change and biodiversity loss in the plan.</p>	

6	Name/Group:	Office of Public Works Ref: LCC-C166-CAHER-9
	Submission:	Response
	<p>The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes Objectives IU O4 (a), Objectives IU O3 (c) and (d); Objective IU O5; Objective IU O6.</p> <p>1. Flood Risk Management (FRM) – General Guidance</p> <p>The Guidelines recommend a three Stage Flood Risk Assessment process for planning authorities to identify flood risk:</p> <ul style="list-style-type: none"> - Stage 1 – Flood Risk Identification; - Stage 2 – Initial Flood Risk Assessment; - Stage 3 – Detailed Flood Risk Assessment. <p>The Strategic Flood Risk Assessment (SFRA) provided for the Caherconlish LAP is stated as being a Stage 1 Flood Risk Assessment, a minimum Stage 2 Initial flood risk assessment is recommended for this type of plan. As potential flood risk issues have been identified, the OPW recommends that this SFRA is a Stage 3 Detailed Flood Risk Assessment is prepared. Flood modelling should be undertaken to accurately assess the potential flood risk to the town, how the risk can be managed, and to inform planning decisions.</p> <p>2. Flooding from Other Sources</p> <p>Submission identifies that flood hazards and potential from all sources should be considered at the earliest stage of planning. Flood zones are identified on the basis of river and coastal flooding only. The risk of pluvial, groundwater and other flooding may also be identified and should be considered separately and not included in the Flood Zone mapping. Submission outlines that the</p>	<p>Noted.</p> <p>1. Flood Risk Management (FRM) – General Guidance</p> <p>An updated Strategic Flood Risk Assessment has been carried out to inform the plan preparation in line with the flood guidelines.</p> <p>2. Flooding from Other Sources</p> <p>An updated Flood Risk Assessment was carried out to provide clarity on flooding from other sources. Refer to Part D of this report.</p>

<p>OPW do not intend to update the PFRA indicative pluvial maps and the Council should consider producing these maps for inclusion in the Plan.</p> <p>3. Flood Zone Map</p> <p>The submission notes that it is unclear what data has been used to produce the flood zone mapping. Limerick City and County should clarify the data source that has been used. Predictive mapping produced from modelling the flood risk would provide a more accurate representation and better inform land use zonings and support planning decisions.</p> <p>4. Flood Risk Identification</p> <p>The SFRA refers to the use of the Appendices of the Guidelines, as headings for the sections and notes that this table should only be used as an indication for information sources, as some of these sources are or could be superseded. The new guidance from OPW is that PFRA mapping is now superseded by the outputs of national indicative flood mapping; National Indicative Fluvial Mapping (NIFM), National Coastal Flood Hazard Mapping (NCFHM) and probabilistic and historic groundwater flood maps prepared by Geological Survey Ireland through the 2016-2019 GWFlood Project.</p> <p>Section 3 of the SFRA Predictive and historic flood maps and benefiting land maps appears to be using an image from an old OPW website. The submission notes that this website is no longer active and this information can be accessed on the OPW's portal www.floodinfo.ie.</p> <p>Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.</p>	<p>3. Flood Zone Map</p> <p>An updated Flood Risk Assessment has been prepared to provide clarity in this regard.</p> <p>4. Flood Risk Identification</p> <p>An updated Flood Risk Assessment is provided as part of this report. The report addresses the issues raised.</p> <p>A new objective will be included in Chapter 8 to ensure the Council, in zoning land for development ensures that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts.</p>
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<p>The OPW requests that Limerick City and County Council have regard in zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts.</p> <p>5. Justification Tests Supplied Justification Tests supplied in the SFRA are welcomed by the OPW. The submission notes that the planning authority should specify the structural or non-structural measures as prerequisites to development and provide information on the residual risks that would remain and how they might be managed.</p> <p>The submission outlines that for zonings/sites that are already developed, then the Department of Environment, Community and Local Government Circular PL 2/2014 provides further advice and detail to planning authorities on older developed areas of towns and cities located in Flood Zone A and B.</p> <p>6. Village Centre and Existing Residential The OPW recommends that the village centre and existing residential zonings are assessed individually against the criteria of Plan Making Justification Test. The submission notes that a site specific FRA is not considered a mitigation measure and the Council should consider providing further guidance on measures considered acceptable in the area. The Plan-making Justification Test and the Development Management Justification Test are noted and the submission requires that all criteria of the Development Management Justification tests are satisfied as well as supplying a SSFRA.</p>	<p>5. Justification Tests Supplied Refer to Part D Strategic Flood Risk Assessment.</p> <p>6. Village Centre and Existing Residential Updated flood justification tests have been carried out in accordance with the flood guidelines. Refer to Section D of this report.</p>
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<p>In the Existing Residential zoning in the Justification Test conclusion, the Council should include reference to Circular PL 2/2014 and should also include referencing to objective IU 05(d) “Ensure that future developments in flood prone areas is generally limited to minor development in line with the Circular PL 2/2014 and the Flood Risk Management Guidelines for Planning Authorities”.</p> <p>7. Nature-based Solution and SuDS The OPW welcomes the following Objectives IU 03 (c); IU 03 (d); IU 05 The submission notes that the Guidelines recommend that the SFRA provides guidance on the likely applicability of difference SuDS techniques for managing surface water run-off at key development sites and the submission requests inclusion of reference to the Best Practise Interim Guidance Document ‘Nature –based Solutions to the Management of Rainwater and Surface Water Runoff In Urban Areas’ and consider the inclusion of objective in relation to nature based solutions.</p> <p>8. Site Specific Flood Risk Assessment Objective IU 04(b) is welcomed and reference should be made in the Plan to Section 5.8 Requirements for a Flood Risk Assessment in the SFRA of the Limerick Development Plan.</p> <p>9. Errata Reference is made in Section 3 of the SFRA titled Predictive and historic flood maps and benefitting lands maps to floosmap.ie, which has been replaced with www.floodinfo.ie</p>	<p>7. Nature-based Solution and SuDS The approach taken in the proposed Local Area Plan, in line with the recently adopted Limerick Development Plan 2022 – 2028, is to seek to adopt SuDS and nature based solutions as an appropriate measure for dealing with surface water management. The Council will work with developers to promote SuDs and nature based solutions on a case by case basis and tailor solutions to specific sites. Updated flood risk assessment in Part D of this report reflect the relevant policies and objectives of the Plan.</p> <p>Section 9.3 Water Supply, Wastewater and Surface Water will be amended to include: “Nature-based Solutions to the Management of Rainwater and Surface Water Run-off in Urban Areas – Best Practice Interim Guidance’ document”</p> <p>8. Site Specific Flood Risk Assessment Noted. Objective IU 04(b) will be amended to reference Section 5.8 Requirements for a Flood Risk Assessment in the SFRA of the Limerick Development Plan.</p> <p>9. Errata Reference to floodmaps.ie will be replaced with www.floodinfo.ie in the Section 3 of the SFRA.</p>
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Chief Executive's Recommendation:	
<ol style="list-style-type: none"> 1. Refer to Part D Strategic Flood Risk Assessment. 2. Refer to Part D Strategic Flood Risk Assessment. 3. Refer to Part D Strategic Flood Risk Assessment. 4. Amend Objective IUO4 in Chapter 9 to add a Part (f) as follows: <u>Ensure that any future development preserves access requirements for the maintenance of Arterial Drainage Schemes and Drainage Districts.</u> 5. Refer to Part D Strategic Flood Risk Assessment. 6. Refer to Part D Strategic Flood Risk Assessment. 7. The following sentence to be added under Chapter 9 Section 9.3 of the plan: <u>Regard will be had to the Government's best practice guidance document, Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (December 2021).</u> 8. Add Objective IU O4(e) as follows: <u>(e)Ensure future development of lands within Flood Risk Zone A/B is in accordance with the plan-making Justification Tests in the SFRA.</u> 9. Replace reference to floodmaps.ie with www.floodinfo.ie in the Section 3 of the SFRA. 	
SEA/AA Response: The SFRA is being updated to include Plan Making Justification Tests to ensure compliance with Section 28 Guidelines – The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) which will safeguard lands in Caherconlish from inappropriate uses.	

7	Name/Group:	Irish Water Ref: LCC-C166-CAHER-16
	Submission:	Response
	<p>Irish Water (IW) welcomes the opportunity to comment on the Draft Caherconlish Local Area Plan 2023-2029 (Draft Plan).</p> <p>1. Sustainable Drainage and Green-Blue Infrastructure</p> <p>Irish Water welcomes the inclusion of objectives and initiatives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure. SuDS and Green-Blue Infrastructure (GBI) are encouraged in new developments, including public realm and retrofitted in existing developed areas.</p> <p>Irish Water is happy to engage with Planning Authorities to progress nature-based</p>	<p>1. Sustainable Drainage and Green-Blue Infrastructure</p> <p>Noted, Section 9.2 Water Supply, Wastewater and Surface Water will be amended to include reference as requested.</p>

<p>rainwater management and suggests referencing the recently published 'Nature-based Solutions to the Management of Rainwater and Surface Water Run-off in Urban Areas – Best Practice Interim Guidance' document.</p> <p>2. Planned road and public realm projects Planned public realm, active travel and road projects have the potential to impact on Irish Water assets and projects, this includes the potential Groody River that may impact on public water services assets Development in the vicinity of Irish Water assets must be in accordance with our Standard Details and Codes of Practice.</p> <p>Where planned development may impact on Irish Water assets, early engagement is requested to ensure public water services are protected and access is maintained</p> <p>3. Zoning and Infrastructure Upgrades Following a review of the land use zoning map, available network information indicates network extensions may be required to service some zoned sites. Depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. Much of the wastewater network within Caherconlish is 150mm in diameter and therefore localised upgrades are likely to be required to facilitate future development.</p> <p>In order to maximise the use of existing water services, Irish Water encourages phased sequential development in areas with existing water services infrastructure and spare capacity.</p>	<p>2. Planned road and public realm projects The Council will ensure that early engagement takes place with all relevant stakeholders, in the preparation of the new road projects, public realm plans and upgrades.</p> <p>3. Zoning and Infrastructure Upgrades It is acknowledged that there will be requirements for additional infrastructure to support these development in Caherconlish and that this infrastructure will be in many cases at the cost of the developer. Upgrades to infrastructure will be considered on a case by case basis to support individual applications as appropriate.</p>
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<p>The submission further notes that to maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted. Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Irish Water projects in place to progress such works.</p> <p>All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed on a case by case basis through Irish Water's New Connections process which will determine the exact requirements in relation to network and treatment capacity.</p> <p>Third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure e.g. on some 'backland' sites, housing estates with private water network. This may apply to the Enterprise and Employment site.</p> <p>4. Wastewater Treatment Plants (WWTPs) The 2021 Wastewater Treatment Capacity Register indicates there is potential spare capacity of approximately 860 population equivalent available in the plant. The WWTP is currently not compliant with its license limits, but is capable of achieving at least Urban Wastewater Treatment Directive standards.</p> <p>Potential availability of capacity would be dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the Waste Water Discharge (Authorisation) Regulations 2007.</p>	<p>4. Wastewater Treatment Plants (WWTPs) Noted.</p>
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<p>Caherconlish was also nominated by the Council for inclusion in the Small Towns and Villages Programme, a number of investment cycles will be required to address all candidates in the STVGP, and IW plan to continue this Programme into the next investment period (2025-2029) and beyond</p> <p>5. Wastewater Networks Irish Water and Limerick City and County Council are continually progressing sewer rehabilitation activities, capital maintenance activities and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. As already noted, due to the prevalence of 150mm diameter sewers, upgrades are likely to be required. There are no other known major constraints on Caherconlish wastewater network.</p> <p>6. Water Supply There is adequate capacity available to cater for the projected growth, the submission notes there are constraints within the water supply. Groundwater investigations are underway to determine if the existing supply can be augmented. If this is unsuccessful, opportunities to interconnect with Limerick City Water Resource Zone (WRZ) or other nearby WRZs will be investigated.</p> <p>The next stage of the National Water Resources Plan (NWRP) Framework Plan is now underway and involves a plan-level approach to address the identified need in a sustainable manner. The Eastern and Midlands Regional Water Resources Plan, which includes Caherconlish, was recently adopted following public consultation.</p> <p>7. Water Networks Irish Water and the Council are continually progressing leakage reduction activities,</p>	<p>5. Wastewater Networks Noted.</p> <p>6. Water Supply Noted.</p> <p>7. Water Networks Noted.</p>
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<p>mains rehabilitation activities and capital maintenance activities. Irish Water and the Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.</p> <p>8. Projected Growth for Caherconlish The submission refers to the Core Strategy units allocated to Caherconlish in Table 3.1 and Table 3.2 of the Draft Plan.</p> <p>The submission queries whether it would be more appropriate to have 146 in the 'Additional households forecasted 2022-2029' column in Table 3.2 to ensure alignment with the core strategy table and objective CSO3 of the Limerick Development Plan. The submission requests clarification on this as it will assist with Irish Water's planning for future growth</p> <p>9. Water and Wastewater Infrastructure The submission proposes the following suggested amendment (in red) for Objective IU O1: Wastewater Infrastructure: b)'This includes the separation of foul and surface water through the provision of sewerage networks and nature-based rainwater management measures.</p> <p>The submission also suggested the following addition (in red):</p>	<p>8. Projected Growth for Caherconlish Table 3.1 uses the core strategy figures of the Limerick Development Plan as a basis to calculate Additional Provision as set out the Development Plan Guidelines for Planning Authorities issued in June 2022 post the adoption of the new Development Plan. This allows for additional units in the order of 20-25% in certain circumstances. Caherconlish has a strong service function for its inhabitants and surrounding hinterland. Its level and diversity of services, community facilities and amenities, availability of serviced and serviceable lands, coinciding with its ease of access and proximity to Limerick City and suburbs and its connectivity to the national road network, further creates a settlement suitable to attract inward investment to support future population growth, in accordance with the objectives of the NPF and RSES. On this basis, the assumed scale of growth for Caherconlish (164 households) is considered reasonable and will be progressed on lands including opportunity, infill and brownfield sites.</p> <p>9. Water and Wastewater Infrastructure Noted, proposed amendments will be included.</p>
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<p>Objective IU O2: Water Supply Infrastructure: c) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements, including innovative solutions in specific situations.</p> <p>10. Surface Water Management and SuDS The submission suggests including a reference to the DHLGH Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document. To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.</p> <p>11. Development of Masterplans and engagement with Irish Water e.g. Table 4.2, Objective DS O1: Residential Development IW supports the requirement to prepare masterplans for proposed developments. The submission requests that as part of the master-planning process, consideration should be given to how these sites will be serviced as well as to potential impacts on Irish Water infrastructure and projects e.g. building over of assets, tree planting, synergies with planned IW projects, opportunities for surface water removal.</p> <p>12. Land Use Zoning Matrix The submission notes that consideration should be given to including water supply and wastewater infrastructure in list of development types.</p>	<p>10. Surface Water Management and SuDS Noted, proposed amendments will be included.</p> <p>11. Development of Masterplans and engagement with Irish Water e.g. Table 4.2, Objective DS O1: Residential Development Noted.</p> <p>12. Land Use Zoning Matrix The purpose of the Land Use Zoning Matrix is to generally indicate planning control objectives for lands within the settlement boundary. Not every type of development can be considered in the matrix and the development of such infrastructure, will be assessed on a case-by-case basis.</p>
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13. Environmental Reports The contents of this submission should be taken account of in the Environmental Reports.	13. Environmental Reports Noted.
Chief Executive's Recommendation:	
<p>1. The following sentence to be added under Section 9.3 of the plan: <u>Regard will be had to the Government's best practice guidance document, Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (December 2021).</u></p> <p>2-8. No change.</p> <p>9. Amend Objective IU O1 - Wastewater Infrastructure: Part B as follows: b) Ensure adequate wastewater infrastructure is available to cater for existing and proposed development, in collaboration with Irish Water, avoiding any deterioration in the quality of receiving waters and ensuring discharge meets the requirements of the Water Framework Directive. This includes the separation of foul and surface water through the provision of sewerage networks <u>and nature based rainwater management measures.</u></p> <p>Add a Part c to Objective IU O2: Water Supply Infrastructure as follows: Objective IU O2 - Water Infrastructure: <u>(c) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements, including innovative solutions in specific situations</u></p> <p>10. Amend Objective IU O3 to include a part 'f' as follows: Objective IU O3: Surface Water Management and SuDS <u>(f) To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.</u></p> <p>11-13. No change.</p>	
SEA/AA Response: The additional details from the point of view of water conservation and demand management will add to the ecological protection of the plan policy contents.	

8	Name/Group:	Department of Education Ref: LCC-C166-CAHER-5
	Submission:	Response
	1. Population Targets and Caherconlish - The submission notes the future population growth identified for Caherconlish as outlined in the Limerick Development Plan 2022-2028. The submission also notes the longer-term	1. Population Targets and Caherconlish The Local Authority acknowledges the Department of Education's position, which outlines that the existing school is anticipated to meet the future demands of Caherconlish, within the lifetime of the plan. The submission

<p>population growth targets, as identified in the National Planning Framework and RSES.</p> <ul style="list-style-type: none"> - The submission considers the growth in population as outlined in the Draft Caherconlish LAP of 395 persons for a 7-year period. - The submission noted that Caherconlish is served by one mainstream primary school and the needs of post primary level are served by the school in Doon. The submission further noted that the Department anticipates that the existing school in Caherconlish and the post primary school in Doon will be able to meet the requirements of the settlement. - The Departments preference is to expand the existing facilities rather than the provision of a new facility and should there be a requirement for addition school places as a result of the planned population increases, this should be facilitated on site. <p>2. Support for Draft LAP</p> <ul style="list-style-type: none"> - The Department notes and supports Section 5.2.1 of the Draft LAP – Education and Childcare to facilitate the provision of any future expansion, lands opposite the existing school have been zoned for community and education use. - The Department noted support for Objective CO2 Childcare and Educational Facilities. <p>3. Future Capacity</p> <ul style="list-style-type: none"> - In terms of assessing current and future capacity, the Department notes that unforeseen circumstances, such as the Ukrainian crisis has the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision. 	<p>also notes the following <i>‘the Department’s preference would be to expand the existing facilities, if possible, should there be a requirement for additional school places as a result of the planned population increases.’</i></p> <p>Caherconlish National School is surrounded by existing residential development with little to no capacity to expand on site. Any expansion of the school facilities would be challenging to accommodate on the existing site, without impacting on the limited play space. In light of the concerns raised by Caherconlish National School regarding the existing conditions on site and constraints for school expansion, additional community and education lands have been zoned to facilitate the future expansion of the educational needs of Caherconlish, should the need arise.</p> <p>2. Support for Draft Plan</p> <p>Noted.</p> <p>3. Future Capacity</p> <p>Noted, the Council will continue to actively engage with the Department of Education to ascertain their specific needs throughout Limerick, as they arise.</p>
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	<ul style="list-style-type: none"> - The Department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location. - The submission also notes that additional Special Education Needs (SEN) provision is anticipated to be required throughout the country and this may result in schools requiring additional accommodation to meet this growing need. The Department will consult with the Local Authority, when additional SEN accommodation is required within specific locations. <p>4. Other</p> <ul style="list-style-type: none"> - The submission welcomes the continued engagement with the Local Authority and emphasises the critical importance of the ongoing work of the Local Authority in ensuring sufficient land is zoned for this purpose. 	<p>4. Other Noted.</p>
Chief Executive's Recommendation:		
<p>1. Amend the Land Use Zoning Map to zone 2.465ha as 'Education and Community' on the L1149 adjacent to Castlepark Estate and amend Table 10.2 Total Zoned Lands accordingly.</p> <p>2-4. No change</p>		
<p>SEA/AA Response:</p> <p>Caherconlish National School is constrained by residential development, which has occurred surrounding the site. The proposed additional zoning future proofs the expansion of the school and is considered a positive approach in terms of compact growth of lands located in proximity to the existing school.</p>		

9	Name/Group:	Caherconlish National School Ref: LCC-C166-CAHER-8	
	Submission:	Response	
	<p>1. School Extension/Provision made for growth of student numbers</p> <p>(i) The submission outlines that Caherconlish National School has undergone three extensions since its construction with the purpose of the current extension to create two new classrooms so allow for</p>	<p>School Extension/Provision made for growth of student numbers</p> <p>1(i) The Council continually actively engage with the Department of Education to ascertain their specific needs throughout Limerick.</p>	

<p>Department of Education requirements and to allow the general purpose room to be used for its original purpose. The school has grown 25% since 2015.</p> <p>The submission refers to the size of the school site, which is limited and surrounded by housing developments on three sides with no room for expansion. The submission notes the de-zoning of land from Education and Community on the RXXX and requests that this be rezoned for education purposes.</p> <p>(ii) The submission queries whether the Local Authority would be willing to donate land for the purpose of a new school to cater for the growing needs of the school.</p> <p>2. Parking</p> <p>In addition, the submission outlines that there are parking issues outside the school gate and accessing the school safely by means of a footpath is challenging.</p>	<p>Caherconlish National School is surrounded by existing residential development with little to no capacity to expand on site. Any expansion of the school facilities would be challenging to accommodate on the existing site, without impacting on the limited play space. In light of the concerns raised by Caherconlish National School regarding the existing conditions on site and constraints for school expansion, additional community and education lands have been zoned to facilitate the future expansion of the educational needs of Caherconlish, should the need arise.</p> <p>(ii) The Local Authority does not own any lands at this location, which could facilitate the development of a new school.</p> <p>2. Parking</p> <p>An application has been made to the National Transport Authority by the Council to enhance pedestrian and cyclist safety at the school gate. The Council will continue to liaise with the NTA and relevant stakeholders to progress this project.</p> <p>In addition, the Council intends to work in conjunction with the school to implement a Safe Route to Schools Programme in 2023.</p>
<p>Chief Executive's Recommendation:</p>	
<p>1(i) Amend the Land Use Zoning Map to zone 2.465ha as 'Education and Community' on the L1149 adjacent to Castlepark Estate and amend Table 10.2 Total Zoned Lands accordingly.</p> <p>1(ii) No change</p> <p>2. No change</p>	
<p>SEA/AA Response:</p> <p>Caherconlish National School is constrained by residential development, which has occurred surrounding the site. The proposed additional zoning future proofs the expansion of the school and is considered a positive approach in terms of compact growth of lands located in proximity to the existing school.</p>	

10	Name/Group:	Aislinn Crofton, Parents Association Caherconlish National School Ref: LCC-C166-CAHER-6	
	Submission:	Response	
	<p>The submission welcomes the Education and Community zoned land located opposite to the school grounds however, the submission notes that this parcel of land for Education and Community will not help the existing situation with the school.</p> <p>The submission proposes considering rezoning an area of land zoned Education and Community which was zoned in the 2012-2018 LAP.</p> <p>The submission notes the requirements of additional zoned land due to lack of space on current school grounds with school at capacity. The limited space in the school site has restricted a number of activities being able to take place on the school grounds.</p> <p>The submission notes that if the school had additional space, the possibility of working with organisations outside the school grounds could be provided. Frustration exists when children request certain activities and are refused based on space provision.</p> <p>The submission notes the future population targets for Caherconlish and queries where these children will go to school with potential to have to travel outside the area for educational purposes.</p> <p>The submission outlines a requirement for a new school and the existing school be repurposed as a preschool/community men’s shed, resource area. The submission further notes the benefits of having a new school located closer to the existing tennis club.</p>	<p>The Council continually actively engage with the Department of Education to ascertain their specific needs throughout Limerick.</p> <p>Caherconlish National School is surrounded by existing residential development with little to no capacity to expand on site. Any expansion of the school facilities would be challenging to accommodate on the existing site, without impacting on the limited play space. In light of the concerns raised by Caherconlish National School regarding the existing conditions on site and constraints for school expansion, additional community and education lands have been zoned to facilitate the future expansion of the educational needs of Caherconlish, should the need arise.</p>	
	Chief Executive’s Recommendations:		

	Amend the Land Use Zoning Map to zone 2.465ha as 'Education and Community' on the L1149 adjacent to Castlepark Estate and amend Table 10.2 Total Zoned Lands accordingly.
	SEA/AA Response: Caherconlish National School is constrained by residential development, which has occurred surrounding the site. The proposed additional zoning future proofs the expansion of the school and is considered a positive approach in terms of compact growth of lands located in proximity to the existing school.

11	Name/Group:	Planning, Placemaking and Environment Directorate, Limerick City and County Council Ref: LCC-C166-CAHER-3
	Submission:	Response
	1. All Ireland Pollinator Plan 2021-2025: Include an objective in the plan to provide policy support for the objectives set out in the All Ireland Pollinator Plan 2021 -2025 as appropriate	1. The Council recognises the importance of the All Ireland Pollinator Plan 2021-2025 as set out in the Limerick Development Plan. The Limerick Development Plan Objective EH O7 All Ireland Pollinator Plan provides continued support for the aims and objectives of the All Ireland Pollinator Plan. The Draft LAP aligns with the Limerick Development Plan 2022-2028 and as such it is not considered necessary to reiterate policies and objectives contained in the Development Plan in lower tier plans.
	2. Amend date of guidelines in Objective IU O3 (a) to read 2022.	2. Noted.
	3. Amend Objective IU O3 (c) reference to Sustainable Urban Drainage Systems SuDS (SuDS) to include 'a nature based approach to Sustainable Urban Drainage Systems SuDS'.	3. The Council recognises the role that Nature Based Solutions (NBS) have, not only to meet certain infrastructure related needs (e.g. flooding management) and development needs, but also to maintain or benefit ecosystems, habitats and species as supported in the Limerick Development Plan. Accordingly, it is considered appropriate to include reference to nature-based approach to Sustainable Urban Drainage Systems to control surface water outfall and protect water quality in Objective IU O3.
	Chief Executive's Recommendation:	
	1. No change.	

	<p>2. Amend Objective IU O3: Surface Water Management and SuDS - It is an objective of the Council to: a) Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater, including reducing the discharges of pollutants or contaminants to waters in accordance with the Proposed Ireland River Basin Management Plan for Ireland 2012-2022-2027 (DHPLG) and associated Programme of Measures.</p> <p>3. Amend and add the following text to Objective IU O3 as follows: Objective IU O3 (c) Require all new developments, to include Sustainable Urban Drainage Systems SuDS (SuDS) to control surface water outfall and protect water quality, <u>and where possible, a nature based approach should be considered and incorporated.</u></p> <p>SEA/AA Response: The inclusion of a nature based approach to managing surface water is considered best practice. The benefits include improved water quality, biodiversity and climate adaptation and mitigation and will confer multi benefits, where the approach can be implemented.</p>
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12	Name/Group:	ClIr PJ Carey and ClIr. Gerard Mitchell Ref: LCC-C166-CAHER-4
	Submission:	Response
	<p>The submission raises concerns in relation to the proposed walkway that connects Caherline GAA Pitch and the Millenium Centre. (Section of proposed riverwalk Opportunity Site 3) by local residents who are concerned the proposal would de-value their homes and create antisocial behavior issues, having regard to its location.</p> <p>Concerns have also been expressed regarding the provision of two pedestrian crosses on Old Barrack Road due to safety concerns.</p> <p>The submission outlines that the residents believe that the existing footpath routes that surrounds Caherconlish are sufficient, and that the people of Caherconlish would be better served from a footpath along the Old Barrack Road connecting the GAA Pitch and the town.</p>	<p>Having regard to concerns raised, in terms of residential amenity, the extent of the Groody River Walk has been amended to ensure no negative impact on the residential amenity of existing properties. The revised details are provided in the Opportunity Site Map included in Part B.</p> <p>Separately, a suitable location for crossing and the installation of a controlled crossing will be included as part of the footpath scheme and will form part of a Part 8 application in the future.</p>
	Chief Executive's Recommendations:	
	<p>1. Amend Zoning Map and Opportunity Sites Map to include a revision of the length of the proposed Groody River Walk terminating at the Village Square.</p> <p>2. Amend text in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles as follows:</p>	

	<p>The proposed river walk begins north of the village centre, with access proposed opposite the estate of Ceol na Habhann on the R513. The route continues behind the former library parallel to the R513 Limerick Road through the 'Open Space and Recreation' zoning designation and continues east, <u>terminating at</u> of the village centre. to the south of the settlement boundary.</p> <p>3. Amend Opportunity Site 4 in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles to include additional lands zoned as New Residential</p>
	<p>SEA/AA Response:</p> <p>The extent of the river side walk is reduced limiting the impact from a biodiversity perspective.</p>

13	Name/Group:	Michael Collins Ref: LCC-C166-CAHER-10
	Submission:	Response
	<p>Concerns regarding proposed Groody River Walk</p> <ul style="list-style-type: none"> - Concerns raised regarding the route of the proposed walkway and requests that this is reconsidered as the current proposal would hinder his security, privacy and safety of other residents along the route. - Fear that the walkway would result in increased anti-social behavior - Concerned that the walkway would result in biodiversity loss and any advancement in this proposal would require a full biodiversity study to be completed by an ecologist. 	<p>Having regard to concerns raised, in terms of residential amenity, the extent of the Groody River Walk has been amended to ensure no negative impact on the residential amenity of existing properties. The revised details are provided in the Opportunity Site Map included in Part B.</p> <p>Separately, a suitable location for crossing and the installation of a controlled crossing will be included as part of the footpath scheme and will form part of a Part 8 application in the future.</p>
	Chief Executive's Recommendation:	
	<p>(i) Amend Zoning Map and Opportunity Sites Map to include a redesign of the length of the proposed Groody River Walk terminating at the Village Square.</p> <p>(ii) Amend text in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles as follows:</p> <p>The proposed river walk begins north of the village centre, with access proposed opposite the estate of Ceol na Habhann on the R513. The route continues behind the former library parallel to the R513 Limerick Road through the 'Open Space and Recreation' zoning designation and continues east, <u>terminating at</u> of the village centre. to the south of the settlement boundary.</p> <p>(iii) Amend Opportunity Site 4 in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles to include additional lands zoned as New Residential</p>	
	<p>SEA/AA response:</p> <p>The reduced extent of the river side walk will safeguard the local area from a biodiversity perspective.</p>	

14	Name/Group:	Caherconlish Tidy Towns Ref: LCC-C166-CAHER-11
	Submission:	Response
	Submission on behalf of Caherconlish Tidy Towns request for more bus shelters in Caherconlish	The Council are currently in the process of applying to the National Transport Authority for funding for the provision of bus shelters across Limerick including Caherconlish.
	Chief Executive's Recommendation:	
	No change	
	SEA/AA Response: No change	

15	Name/Group:	Caherconlish Tidy Towns Ref: LCC-C166-CAHER-12
	Submission:	Response
	Submission on behalf of Caherconlish Tidy Towns outlining their support of the proposed development of lands in the centre of the village, as a community park. The Committee requests that any development of this park would involve full consultation with the community and interested groups.	The site has been identified as an Opportunity Site in the Local Area Plan with the development potential to create a walkable and cycle friendly community park that will enhance access and improve permeability and active travel linkages to the village centre. Any application to develop the site will be subject to the planning process and will include appropriate public consultation as required by the relevant legislation.
	Chief Executive's Recommendation:	
	No change	
	SEA/AA Response: N/A	

16	Name/Group:	Caherconlish Tidy Towns Ref: LCC-C166-CAHER-13
	Submission:	
	Caherconlish Tidy Towns welcomes the proposal for the provision of a footpath from the village to the GAA grounds. The Committee believe that the provision of such infrastructure would enhance the safety where accessing the grounds along with making the grounds more accessible to the wider community.	The proposal to deliver the footpath from the village to the GAA field will be subject to feasibility and examination of existing infrastructure constraints and available funding.

	<p>The submission requests that the provision of such infrastructure is provided along the right hand side (leaving the village) of the R513, rather than the current indicative footpath which is proposed on the left hand side (leaving the village) of the R513.</p>	<p>A suitable location for a proposed crossing and the installation of a controlled crossing would be included as part of the footpath scheme.</p>
	Chief Executive's Recommendation:	
	No change	
	SEA/AA Response: N/A	

17	Name/Group:	Caherconlish Caherline Community Centre Council Ref: LCC-C166-CAHER-14	
	Submission:	Response	
	<p>The submission outlines the views of a group of local residents from Caherconlish and Caherline and also takes account of a community planning process being facilitated by Ballyhoura Development Ltd.</p> <p>1. Extension of LAP Boundary</p> <ul style="list-style-type: none"> - The submission proposes two additional land banks to be included within the settlement boundary, one proposed to be zoned for Open and Space and Education and Community. - This proposal is to encompass the current grounds of the tennis club, which has a feasibility study in place for the development of the site and to support future planning that includes the provision for growth in population and caters for the education, community, and open space for recreation. - The current Caherconlish Local Area Plan boundary has little or no scope for developments to cater for the education, community and recreation needs of the village <p>2. Transport Related Issues:</p>	<p>1. Extension of LAP Boundary</p> <p>The Council recognise and are committed to the delivery of compact growth in line with the NPF and the corresponding objectives from the RSES. Considering the existing built footprint of the village and to align with national planning policy, the Plan boundary has been formulated to ensure the delivery of compact growth.</p> <p>5.65ha of Open Space and Recreation and 5.234ha of Education and Community is zoned in the Draft Plan, which can facilitate the delivery of community facilities.</p> <p>2. Transport Related Issues</p>	

<p>(i) The car parking for the National School is inadequate. The front of the national school is an incident black spot. School related traffic – safety issue and requires traffic management; Difficulties in walking children to school – school related traffic causing traffic hazard and additional safety concerns regarding larger vehicles</p> <p>(ii) The soccer field needs additional space for cars and a play area due to considerable and forecasted population growth. The submission refers to it being an incident black spot-on days of games;</p> <p>(iii) The lack of a pathway to the GAA field is very dangerous due to its location on a major road. This road is an incident blackspot on any day, but more so on match days;</p> <p>(iv) Church yard/carparking a poor state needs upgrading;</p> <p>(v) No taxi service;</p> <p>(vi) Poor bus schedule and times for starting work at 8am in Limerick City centre.</p> <p>(vii)Car parks in the village;</p>	<p>(i) An application has been made to the National Transport Authority to fund a scheme to enhance pedestrian and cyclist safety at the Caherconlish National School gate. The Council will continue to liaise with the NTA and relevant stakeholders to progress this project.</p> <p>In addition, the Council intends to work in conjunction with the school to implement a Safe Route to Schools Programme in 2023.</p> <p>(ii)The Council are currently working with Caherconlish AFC in this regard. See response to Submission No.18.</p> <p>(iii)Objective SMT O2: ‘Sustainable Travel Infrastructure’ of the Draft Plan seeks to maintain and expand active travel infrastructure including to Caherconlish Caherline GAA pitch.</p> <p>(iv) The Church car park is in private ownership and responsibility for its upgrade lies with the owners of the property.</p> <p>(v) The provision of taxi facilities is outside the remit of the Local Area Plan.</p> <p>(vi) In October 2022, the National Transport Authority announced the provision of a new route between Caherconlish and Limerick City. The Council will continue to liaise with the NTA to enhance bus connectivity.</p> <p>(vii) There are currently no future proposals for additional carparks in Caherconlish. Planning permission granted for the construction of 7 no. 2-storey townhouse type dwellings on lands at Lynch’s Corner includes a total number of 9 public car parking spaces provided for on the site.</p>
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<p>(viii)Incomplete footpath on the busy walkway around the creamery, poor signage and extremely bad bends are a high-risk black spot;</p> <p>(ix)Surface water issues exist</p> <p>(x) Main street is full of potholes;</p> <p>(xi) Poor signage on entrances to the village, particularly coming past the GAA field;</p> <p>(xii) There is no EV points for vehicles and suggest the need to be incorporated into this Local Area Plan. The Riverside walk (and vehicular access to Main Street homes) behind the main street houses might be designed and developed to allow vehicles to access EV outlets.</p> <p>(xiii) Issue with parking on match days/ car blocking footpaths and traffic diversions causing congestion. Safety concerns for pedestrians to access the soccer pitch and footpath given issues with traffic and parking. Traffic congestion and traffic speed in the village particularly on entrances to the village.</p>	<p>(viii)Given the limited capacity of this section of the 'Creamery Road', there is no current proposal to construct a footpath on this road. Objective SMT O2 'Sustainable Travel Infrastructure' of the Draft Plan seeks to maintain and expand active travel infrastructure including the provision of traffic calming measures on the Old Creamery Road.</p> <p>(ix)The drainage system from Newtown/Soccer pitch down to the Regional Road R513 is currently being examined and it is expected, subject to funding and landowner agreement, that improvements would be carried out in 2023.</p> <p>(x) Potholes are repaired on an ongoing basis as soon as is practicable once reported by the public or identified by Local Authority personnel.</p> <p>(xi) A review of the approach signage entering Caherconlish will be carried out and the Council will identify improvements as necessary.</p> <p>(xii) The Council are currently preparing an EV Strategy for Limerick. This strategy aims to address this issue.</p> <p>(xiii) The key infrastructure objectives for Caherconlish seeks to enhance accessibility to and within Caherconlish and to create an environment that supports sustainable travel and a better quality of life for its residents. The Draft LAP supports the preparation of a Traffic Management Plan for Caherconlish, which aims to manage the existing road network and its users to maximise safety, efficiency and reliability.</p>
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<p>(ix) Sewer stormwater issues causing a risk of damaging our river waterway going through the village.</p> <p>3. Lack of Facilities in Village</p> <p>(i) There is no sit-down area in the village i.e., in the square, churchyard, or parish field;</p> <ul style="list-style-type: none"> - Village is run down, cramped/crowded. <p>(ii) Need for additional facilities</p> <ul style="list-style-type: none"> - The closing of the handball is a huge loss to the village and the requirement for facilities such as an astro turf pitch in village to support the current sporting groups and a men's shed; - Doctors' clinic has no capacity for new patient and is too small to serve the village; - Need for a mental health hub in the village; - Submission proposes the requirement of a new school as current school has outgrown the site; - Lack of youth activities/facilities that would encourage more pro-social opportunities for the growing age range 	<p>(ix) This is an operation issue and has been forwarded to the relevant Department.</p> <p>3. Lack of Facilities in Village</p> <p>(i) The Draft Plan identifies a number of Opportunity Sites that have the potential to sustain community vitality and contribute to a positive public realm experience. Two of these sites include the Village Square and the Parish Field. The development proposals provided within the plan are high level and would require specific design concepts at a later stage, should funding become available. These design concepts would include public realm improvements such as seating.</p> <p>(ii) The Draft Plan supports the provision of sufficient zoned lands to facilitate the expansion of existing and provision of new education, sports clubs, cultural facilities, healthcare facilities and community infrastructure in appropriate locations.</p> <p>Objective CO3: Community Facilities outlines the Council's objective to support and facilitate the provision of multi-functional community facilities to meet the needs of the population of Caherconlish.</p> <p>The Council continually actively engage with the Department of Education to ascertain their specific needs throughout Limerick.</p> <p>With reference to the requirement of a new school, Caherconlish National School is surrounded by existing residential development with little to no capacity to expand on site. Any expansion of the school facilities would be challenging to accommodate on the existing site, without impacting on the limited play space. In light of the concerns raised by Caherconlish National School regarding the existing conditions on site and constraints for school expansion,</p>
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	<p>(iii) Proposal to purchase the old church on Barrack Road to be utilised as a community hub/space/library and other educational/historical purpose;</p> <p>(iv) Lighting of the steeple needs updating;</p> <p>(v) No information boards or signage to show where services are/historical monuments;</p> <p>(vi) Seven housing estates in the village and issue with antisocial behaviour.</p> <p>(vii) The proposed walkway by the river from the Millennium Centre to Old Barracks has a growing number of objectors, issue of anti-social behavior;</p>	<p>additional community and education lands have been zoned to facilitate the future expansion of the educational needs of Caherconlish, should the need arise.</p> <p>(iii) The building is privately owned and is currently not for sale.</p> <p>(iv) The Old Protestant Church and associated steeple is an important archaeological and environmental structure within Caherconlish. Following a land use survey of the village, evidence of the protected Barn Owl was present within the Old Medieval Church in the centre of the village and a former bat survey carried out by the Local Authority has also identified the presence of bats nesting within the Church grounds. Given that the Church is also a Protected Structure (RPS 1046) and in order to ensure the protection of biodiversity associated with the site, additional lighting within the vicinity would not be supported.</p> <p>(v) The Local Authority will work with community groups should funding become available to develop such a proposal.</p> <p>(vi) The contents of the submissions regarding antisocial behaviour are noted. The Council continue to liaise with the local Gardaí to address issues of antisocial behaviour.</p> <p>(vii) Having regard to concerns raised, in terms of residential amenity, the extent of the Groody River walk has been amended to ensure no negative impact on the residential amenity of adjoining properties. The revised details are provided in the Opportunity Site Map included in Part B.</p> <p>Separately, a suitable location for crossing and the installation of a controlled crossing would be included as part of the footpath scheme.</p>
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	<p>4. Economy</p> <ul style="list-style-type: none"> - Requirement to tackle unemployment in area; - Issues with vacancy and requirement to bring these units back into use; <p>5. Housing</p> <p>Submission notes the future plans for Caherconlish and an additional 164 units. Increase in population needs to be planned for and new housing must cater for a spectrum of age ranges; under 5 services, primary school places, adolescent services, and activities.</p>	<p>4. Economy</p> <p>The vision of the Draft Plan is to improve the local environment of Caherconlish focusing on the sustainable growth of the built environment, employment generation, and the provision of community and social services together in a low carbon, compact, consolidated manner. The Draft Plan promotes the Town Centre First policy approach which seeks to bring people and appropriate business/services back into the heart of Caherconlish. This plan seeks to enable Caherconlish to become an important local driver and self-sufficient village providing a range of functions for its resident population and the surrounding hinterland.</p> <p>Limerick City and County Council have been proactively working to address vacancy and dereliction across Limerick. The Council has a proactive regime in place, which aims to tackle the issues of dereliction and vacancy throughout Limerick. The Dereliction, Vacancy and Re-Use Team of the Council engages with property owners to advise on remedial measures and give guidance on schemes and supports available to bringing vacant and derelict homes back into productive use.</p> <p>5. Housing</p> <p>This Draft LAP aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes Caherconlish an attractive and inviting place to live. Policy DS P1 of the Draft Plan outlines the Development Strategy for the lifetime of the plan, including the provision of new quality housing built for mixed tenure and size to cater for the full life cycle – ‘It is policy of the Council to: Deliver new residential development in accordance with the Core Strategy of the</p>
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	<p>6. Environment</p> <p>(i) Request that LCCC work with the village to establish a forum to initiate and develop a biodiversity strategy.</p> <p>(ii) Bottle Banks and recycling facilities are required;</p> <p>(iii) Requirement for dog waste bins around the Creamery Walkway and any other proposed new walkways;</p>	<p>Limerick Development Plan 2022-2028, supporting a choice of quality housing, mixed tenure and unit size/type universally designed for ease of adaption to the lifecycle and mixed mobility needs.</p> <p>6. Environment</p> <p>(i) The Local Authority will work with community groups should funding become available to develop such a proposal.</p> <p>(ii) There are sufficient zoned lands located in Caherconlish to accommodate the development of a bring centre and they will be provided subject to resources.</p> <p>(iii) The requirement for additional bins in Caherconlish is an operational issue and beyond the remit of the Local Area Plan.</p>
Chief Executive's Recommendation:		
	<p>1-2. No change</p> <p>3(i) No change</p> <p>3(ii) Amend the Land Use Zoning Map to zone 2.465ha as 'Education and Community' on the L1149 adjacent to Castlepark Estate and amend Table 10.2 Total Zoned Lands accordingly.</p> <p>3(iii)-(vi): No change</p> <p>3(vii) Amend Zoning Map and Opportunity Sites Map to include a revision of the length of the proposed Groody River Walk, terminating at the Village Square.</p> <p>Amend text in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles as follows:</p> <p>The proposed river walk begins north of the village centre, with access proposed opposite the estate of Ceol na Habhann on the R513. The route continues behind the former library parallel to the R513 Limerick Road through the 'Open Space and Recreation' zoning designation and continues east, <u>terminating at</u> of the village centre. to the south of the settlement boundary</p> <p>Amend Opportunity Site 4 in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles to include additional lands zoned as New Residential</p>	

	<p>4. Insert the following text into Section 4.3 Town Centre Health Check:</p> <p><u>Limerick City and County Council have been proactively working to address vacancy and dereliction across Limerick. The active land use management tools available to the Council are underpinned by Derelict Sites Act, 1990 (as amended), the Urban Regeneration and Housing Act 2015 (for vacant sites), Residential Zoned Land Tax and key Government policies such as Town Centre First, Our Rural Future, and Housing for All. In addition, the Council is committed to working with property owners to reactivate long-term vacant homes and unused properties for sustainable productive use as social or private housing and support and promote public funding opportunities such as Croí Cónaithe.</u></p> <p>The Council has a proactive regime in place, which aims to tackle the issues of dereliction and vacancy throughout Limerick. A dedicated team within the Council work on a continuous basis seeking to reduce vacancy and dereliction, through the various tools available, including compulsory purchase orders of vacant and underutilised properties. <u>The Dereliction, Vacancy and Re-Use Team of the Council engages property owners to advise on remedial measures and give guidance on schemes and supports available to bringing vacant and derelict homes back into productive use.</u></p> <p>Insert a new objective into Section 4.3 Town Centre Health Check</p> <p><u>Objective ED O4: Active Land Management:</u> it is an objective of the Council to:</p> <p><u>(a) Support and facilitate the reuse and revitalisation of derelict, vacant and underutilised sites and disused buildings throughout Caherconlish for residential, economic, community and leisure purposes.</u></p> <p><u>(b) Promote and facilitate the re-use of under-utilised or vacant lands/buildings in Caherconlish through the active land management mechanisms such as the Derelict Sites Act, 1990 (as amended), the Urban Regeneration and Housing Act 2015 (for vacant sites), Residential Zoned land Tax and also through key Government guidance policies such as Town Centre First, Our Rural Future, and Housing for All and any replacements thereof. The Council will engage property owners to advise on remedial measures and give guidance on schemes and supports available to bringing vacant and derelict homes back into productive use.</u></p> <p>5-6. No change</p>
	<p>SEA/AA Response:</p> <p>The changes outlined above include positive alterations, which will provide clarification and compliance with national and regional policy.</p> <p>In relation to Town Centre First, the proposed changes regarding active land management will address the pattern of commercial vacancy in Caherconlish and support urban regeneration of the village centre by supporting and facilitating the reuse of derelict, vacant and underutilised sites.</p>

18	Name/Group:	Caherconlish AFC
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Ref: LCC-C166-CAHER-15	
Submission:	Response
<p>The submission outlines growing membership in Caherconlish AFC and the need for more facilities including an additional pitch. The submission requests a change in zoning to support the further development of the club.</p> <p>Caherconlish AFC have been allocated funding to develop a sporting facility in the location. The submission includes a proposed layout of the football club.</p> 	<p>Lands zoned New Residential adjacent to Caherconlish AFC is identified by the Council's Housing Department and forms part of the Approved Pipeline Sites under LCCC Housing Delivery Action Plan 2022-2026. The site has already progressed to design stage and at this stage the lands are not available to be rezoned without compromising the local authority housing scheme.</p>
Chief Executive's Recommendation:	
No change	
SEA/AA Response:	
No change	

19	Name/Group:	MacCabe Durney Barnes on behalf of Glencore Zinc Ireland Ltd. Ref: LCC-C166-CAHER-17
	Submission:	Response
	<p>Background</p> <p>The submission refers to Limerick as containing the country's largest zinc deposits and notes that exploration and in due course exploitation of the deposit, has and will continue to contribute to the local economy of Caherconlish.</p> <p>Limerick Development Plan</p>	<p>The contents of the submission are noted. The Council recognises the importance and economic value of aggregates and the mineral sector to the national, regional economy and have established policies and objectives to protect the operations of working quarries and proven aggregate resources in line with national and regional policy and subject to</p>

<p>The submission refers to Section 5.8.18 of the Plan in the recognition of the exploration and extract industry to economic development.</p> <p>The submission specifically notes Objective ECON O39 Mineral Extraction and Environmental Impacts and outlines their support for the objectives of the Limerick Development Plan.</p> <p>Draft Caherconlish Local Area Plan 2023-2029</p> <ul style="list-style-type: none"> - The submission wishes to acknowledge support to the strategic vision for Caherconlish as outlined in the Draft Plan and specifically Objective 2, which seeks to “Promote sustainable economic development, enterprise and employment opportunities and prioritise the village centre, as the primary location for retail and commercial activity.” The submission also references Objective 5 “Protect, enhance and connect areas of natural heritage, blue green infrastructure and open space for the benefits of quality of life and biodiversity, capitalising on climate change adaptation and flood risk measures” and Objective CH01 indicates that it is an objective of the Council to, inter alia: “d) support the development of low carbon and green technological businesses and industries” and outlines support for the vision and objectives contained within the Draft Plan. <p>Land Use Framework</p> <ul style="list-style-type: none"> - The submission highlights Chapter 10 and Section 10.1 and notes the purpose of zoning is to indicate to property owners and the public the types of development, which the Planning Authority considers most appropriate in each land use category. Zoning is 	<p>appropriate levels of environmental assessment.</p> <p>The Draft LAP aligns with the Limerick Development Plan 2022 – 2028, Section 5.8.18 Mineral Extraction and the recognition of the extraction industry to Limerick’s economy. It is not considered necessary to reiterate policies and objectives contained in the Development Plan in lower tier plans, as in assessing proposals for development, both the Development Plan and Local Area Plan will be considered in tandem.</p>
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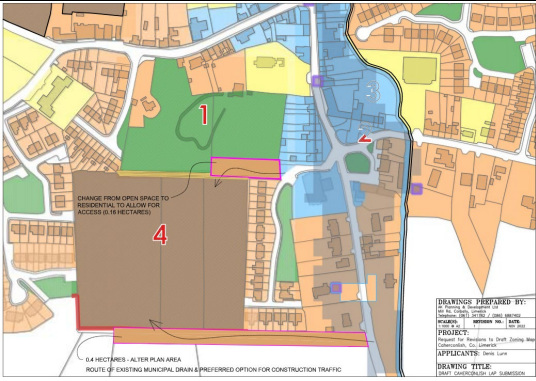
	<p>designed to reduce conflicting uses within areas, to protect resources and ensure that land suitable for development is used to the best advantage of the community as a whole.</p> <ul style="list-style-type: none"> - The submission notes the Land Use Zoning Map is to be read in conjunction with the Land Use Zoning Objectives, and the Land Use Zoning Matrix. Section 10.2 indicates that “the matrix acts as a generally guideline and the list is not exhaustive.” - The submission refers to Table 10.5 in the zoning matrix as it identifies ‘Extractive Industry/Quarry’ as a category of land use. - The submission notes that in the exploration and exploitation of the mineral resource at Pallas Green, which extends over a very wide area, there may, in due course be certain ancillary elements, which may fall within the overall Caherconlish LAP area, both at surface and subsurface levels (e.g. surface water outfalls, pumping facilities, air vents and connecting deep substrata infrastructure). - The submission wishes to highlight that these ancillary elements of the project are clearly distinguishable from the principal extraction of any minerals, which may be deemed or perceived as incompatible with other uses and requests that the ancillary elements should be considered as part of any large project and determined in accordance with the policies and objectives of the County Development Plan and the Local Area Plan, relating to sustainable development and environmental protection. - The submission requests that a footnote is included with reference to Extractive Industry/Quarry: Excludes ancillary 	
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	elements which will be assessed against the overarching policies and objectives of the Limerick Development Plan and this Local Area Plan	
	Chief Executive's Recommendation:	
	No change	
	SEA/AA Response:	
	No change	

20	Name/Group:	Caitríona McCarthy Ref: LCC-C166-CAHER-18
	Submission:	Response
	<p>The proposed route and walkway north of the Village Centre</p> <ul style="list-style-type: none"> - The submission outlines opposition to the proposed riverside walk route. - Submission suggests that the route creates security and privacy issues due to being situated to the rear of residential properties. Submission suggests that the location of the route would mean no passive surveillance which in turn would lead to antisocial behaviour. - The submission suggests that the walkway exposes private land to the activity of horse tethering and subsequent negative implications to flora/fauna. - The submission identifies that the riverside walk is proposed on lands outside the LAP boundary. 	<p>Having regard to concerns raised, in terms of residential amenity, the extent of the Groody River Walk has been amended to ensure no negative impact on the residential amenity of existing properties. The revised details are provided in the Opportunity Site Map included in Part B.</p> <p>Separately, a suitable location for crossing and the installation of a controlled crossing will be included as part of the footpath scheme and will form part of a Part 8 application in the future.</p>
	Chief Executive's Recommendation:	
	<p>1. Amend Zoning Map and Opportunity Sites Map to include revision of the length of the proposed Groody River Walk, terminating at the Village Square.</p> <p>Amend text in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles as follows:</p> <p>The proposed river walk begins north of the village centre, with access proposed opposite the estate of Ceol na Habhann on the R513. The route continues behind the former library parallel to the R513 Limerick Road through the 'Open Space and Recreation' zoning designation and continues east, <u>terminating at</u> of the village centre. to the south of the settlement boundary.</p>	

	Amend Opportunity Site 4 in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles to include additional lands zoned as New Residential
	SEA/AA Response: The extent of the River Side Walk is reduced limiting the impact from a Biodiversity Perspective.

21	Name/Group:	AK Planning on behalf of Denis Lunn Ref: LCC-C166-CAHER-20
	Submission:	Response
	<p>The submission refers to access of the owners land as referenced in the attached Map as 'Opportunity Site no.4'.</p> <p>The submission is seeking to extend the residentially zoned area in the Draft Plan to accommodate access to the lands at two points – north and south of the site. The submission notes that existing potential connections from abutting lands are inadequate in width to accommodate pedestrian and cycling infrastructure, and hazardous/problematic for construction traffic. The submission suggests that the proposed northern access route would result in a loss of 0.16 ha of open space, with the creation of a spur from Barrack Close.</p> <p>The proposed southern access route is a 0.4 ha strip of land, which currently functions as a farm track and is an existing route for mains surface and foul water drainage. The proposed route, as provided in the submission is suggested as a preferred option for construction traffic and would provide a quality accessible development for all transport modes.</p>	<p>Having considered the zoning and potential to serve the site with vehicular access, additional lands have been zoned to provide a direct access to serve the lands in lieu of access via an existing housing development.</p> <p>It is not considered appropriate to change the zoning and allow for vehicle access north of the site, as this would impact on the development of Opportunity Site 1. However, pedestrian and cycle access should be provided at this location to create better permeability and access to the town centre.</p>

		
Chief Executive's Recommendation:		
<p>1. Amend the Land Use Zoning Map by extending Opportunity Site 4 to zone an additional .304ha as 'New Residential' and amend Table 10.2 Total Zoned Lands accordingly.</p> <p>2. Add the following text into <i>Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles</i> under Opportunity Site 4:</p> <p>Detailed masterplan will be required showing proposed connectivity and linkages and access points as part of any development proposal. <u>Vehicle access shall be provided via the R513 while pedestrian and cycle access shall be prioritised to create additional linkages and permeability into Opportunity Site 1, the Square, and surrounding residential estates.</u></p>		
<p>SEA/AA Response:</p> <p>Limited additional lands zoned with enhanced accessibility provided.</p>		

22	Name/Group:	Patrick Hourigan Ref: LCC-C166-CAHER-21	
	Submission:	Response	
	<p>1. LAP Boundary</p> <p>Submission makes multiple references to the LAP boundary, namely;</p> <p>Requests the reinstatement of the land previously zoned affordable/social housing (2008 LAP)</p> <p>The boundary to be extended to include the Caherconlish Newtown residential area, as it makes up a large proportion of the townland and is stated in the CSO population statistics. Request that the LAP boundary to be increased so that the lands between the newly constructed public footpath adjacent to Caherconlish Grounds and the Old Creamery Road to Oakley Lawn are included.</p> <p>2. Development of the Town</p>		<p>1. LAP Boundary</p> <p>The Council have zoned sufficient lands to cater for the future growth of Caherconlish in line with the Limerick Development Plan. Additional Education and Community lands have been zoned as per Submission No. 6.</p> <p>2. Development of the Town</p> <p>(i) See response above.</p>

<p>(i)Requests that Caherconlish is not constricted/denied development and should be developed similar to Castleconnell, Patrickswell and Mungret.</p> <p>(ii)Access to river walk reinstated at the rear of Barrack Street (Main Street)</p> <p>(iii)The Local Authority temporarily closed the local library and the submission requests that this is reopened as a library.</p> <p>3. Zoning</p> <p>(i)Lands west of and bordering Barrack Road returned to educational/ community zoning.</p> <p>(ii)Lands at ‘Hundred Acres East’, and adjacent to the entrance of Ceol na hAbhainn Residential, once submitted for the development of a health centre be zoned for potential health service.</p> <p>(iii) The zoning of the Garda building to be updated to reflect the use of the building when it was built.</p>	<p>(ii)Access to River Side Walk from Barrack Street (Main Street) appears to be via private property.</p> <p>(iii)The re-opening of Caherconlish Library is beyond the remit of this LAP. The former library building is zoned village centre which could accommodate a range of uses should the building be repurposed. This could accommodate the reopening of the library.</p> <p>3. Zoning</p> <p>(i) Having regard to concerns raised, in terms of residential amenity, the extent of the Groody River Walk has been amended to ensure no negative impact on the existing amenity of adjoining properties. The revised details are provided in the Opportunity Site Map included in Part B.</p> <p>Separately, a suitable location for crossing and the installation of a controlled crossing will be included as part of the footpath scheme and will form part of a Part 8 application in the future.</p> <p>(ii)The Draft Plan supports the expansion of community facilities including health related facilities through Objective CO1: Expansion of Community and Education Facilities. Sufficient lands have been zoned for village centre and community and education closer to the village centre which could accommodate this use.</p> <p>(iii) In order to reflect the original use of the whole site where Caherconlish Garda Station is located, the full site will be amended and zoned as ‘Education and Community’ to reflect this use.</p>
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<p>(iv)The town centre, as mapped should be extended to take in High Street to help recoup lost businesses.</p> <p>(v)Lands opposite the National School, (known as ‘College Field’ or ‘Gort na Mansrach’) should be archaeologically assessed prior to being rezoned for ‘educational and community’ purposes.</p> <p>4. Heritage The Castle at Caherconlish is designated solely as a Heritage Site, with a focus on access and egress.</p> <p>5. Consultation Local consultations should be open to the general public and not be reserved to groups/associations without an initial general public meeting.</p>	<p>(iv) In support of Compact Growth, village centre zoning has been proposed on a section of High Street, Main Street and Barrack Street to ensure consolidation of Caherconlish Village Centre through densification of appropriate commercial, residential, civic, cultural and leisure uses whilst strengthening retail provision.</p> <p>(v) Lands referred to are within the ‘Zone of Notification’ as outlined in the National Monuments Map. As such, archaeological considerations will be an important aspect in consideration of any development proposed within these lands and will be referred to the appropriate bodies for assessment.</p> <p>4. Heritage The Castle Site is zoned Open Space and Recreation in the Draft LAP.</p> <p>The Draft Plan acknowledges that the entire site has important historical and archaeological associations for the locality. The development principles associated with Opportunity Site 1 include to ensure that full consideration is given to the protection of archaeological heritage, in undertaking, approving or authorising development in order to avoid unnecessary conflict between development and the protection of archaeological heritage. In addition, improved access and permeability will also be prioritised as part of any development proposals.</p> <p>5. Consultation The consultation process for the Draft Plan involved a six-week period where observations/submissions were welcome from public and private bodies and the general public. Public consultation was also carried out in line with the requirements of the Planning and Development Act and engagement was facilitated with all relevant stakeholders as</p>
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		considered appropriate. A public consultation session was held on the 15 th of November between 3pm to 7pm in the Millennium Centre in Caherconlish.
	Chief Executive's Recommendation:	
	1-2 No change. 3(i)-(ii) No change. 3(iii) Amend the Land Use Zoning Map to zone .058ha from 'Existing Residential' to 'Education and Community' at the Garda Station and amend Table 10.2 Total Zoned Lands accordingly. 3(iv)-(v) No change 4-5. No change.	
	SEA/AA Response: The change in zoning from Existing Residential to Education and Community is to reflect the existing land use on ground.	

23	Name/Group:	Brid Moynihan Ref: LCC-C166-CAHER-23
	Submission:	Response
	Submission welcomes a number of initiatives within the Draft Plan, before making the following observations/suggestions: 1. Zoning (i) Lands adjacent Caherconlish National School to be rezoned for educational use, having been de-zoned in the Draft Plan—supporting the concerns raised in other submissions regarding the need for a new school site.	Noted. 1. Zoning (i) The Council continually actively engage with the Department of Education to ascertain their specific needs throughout Limerick. Caherconlish National School is surrounded by existing residential development with little to no capacity to expand on site. Any expansion of the school facilities would be challenging to accommodate on the existing site, without impacting on the limited play space. In light of the concerns raised by Caherconlish National School regarding the existing conditions on site and constraints for school expansion, additional community and education lands have been zoned to facilitate the future expansion of the educational needs of Caherconlish, should the need arise.

<p>(ii)Requests lands to be zoned for the development of a purpose built crèche, recycling bank, new medical centre with ample parking and to which could cater for a second GP/other health care professionals.</p> <p>2. Transport Proposals</p> <p>(i) Active Travel Measures</p> <ul style="list-style-type: none"> - Extend the footpath to make a loop of the Creamery Walk; - Create cycle lanes along the Creamery Loop and include access to the proposed Community Park and the Groody River Pathway. - Make cycle lanes a distinguishing feature of the village to encourage visitors to the area; - Provide the provision of a bus shelter; - Provide the provision of a carpark to serve those using public transport/visiting the village/using the proposed park/using cycle lanes; 	<p>(ii)Objective CO1: Expansion of Community and Education Facilities and Objective CO2 Childcare and Educational Facilities provides the policy support in the plan for the provision of sufficient zoned lands to facilitate the expansion of healthcare facilities and supports improvements to existing childcare within Caherconlish.</p> <p>There are sufficient zoned lands located in Caherconlish to accommodate the development of a bring centre and they will be provided subject to resources.</p> <p>2. Transport Proposals</p> <p>(i) The proposal to deliver the footpath from the village to the GAA field will be subject to feasibility and examination of existing infrastructure constraints and available funding.</p> <p>A suitable location for a proposed crossing and the installation of a controlled crossing will be included as part of the footpath scheme.</p> <p>The provision of cycle lanes is dependant on a number of factors, including the receiving environment. The undertaking of a Traffic Management Plan is an objective of the plan proposed to manage the existing road network and its users to maximise safety, efficiency and reliability. This includes maximising road safety for cyclists. All opportunity sites proposed in the Draft Plan promote permeability and active travel linkages to the wider Caherconlish village as paramount to the development potential/principles of these sites. This includes the proposed neighbourhood park and the Groody River Side Walk.</p> <p>The Council are currently in the process of applying to the National Transport Authority for the provision of bus shelters across Limerick including Caherconlish.</p>
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	<p>(ii) Development of a bridge over the Groody River and cater for all mobility users to safely access the community centre/housing from the village centre.</p> <p>3. Community Development Proposals</p> <p>(i) Upgrade the community playground to include equipment for children using wheelchairs.</p> <p>(ii) Create a sensory area in the community park.</p> <p>(iii) Develop social housing for the older population who live in the community.</p>	<p>There are currently no future proposals for additional car parks in Caherconlish. Planning permission granted for the construction of 7 no. 2-storey townhouse type dwellings includes a total number of 9 public car parking spaces provided for on the site.</p> <p>(ii) As part of proposed Opportunity Site 2 The Village Square as outlined in the Draft Plan, the development potential/principals includes the provision of enhanced pedestrian connectivity within the Square and to the Millennium Centre.</p> <p>This is also included as Action No. 4 under Chapter 11 Monitoring and Evaluation in Table 11.1 and provided for in Objective SMT O2: Sustainable Travel Infrastructure.</p> <p>3. Community Development Proposals</p> <p>(i) In 2022, Limerick City and County Council operated a scheme of assistance for community playgrounds targeted at repairing and upgrading community playgrounds in County Limerick. The scheme offered a grant of 90% of the cost of the work to each community playground who was successful in the application process. The Council did receive an application for this scheme for Caherconlish who were successful in the application process and funding has yet to be drawn down.</p> <p>(ii) Planning permission has been granted for a redevelopment of Caherconlish Tennis Club which includes the provision of a sensory garden.</p> <p>(iii) The Development Strategy outlined in the Draft Plan aims to provide good quality housing that meets the needs of a diverse population. This includes ensuring a mixture of house types and sizes is developed to reasonably match the requirements of the different categories of households, including</p>
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		the special requirements of older people and persons with disabilities; Policy DS P1: Development Strategy of the Drat Plan outlines the following - It is policy of the Council to: Deliver new residential development in accordance with the Core Strategy of the Limerick Development Plan 2022 – 2028, supporting a choice of quality housing, mixed tenure and unit size/type universally designed for ease of adaption to the lifecycle and mixed mobility needs.
	Chief Executive's Recommendation:	
	<p>1(i) Amend the Land Use Zoning Map to zone 2.465ha as 'Education and Community' on the L1149 adjacent to Castlepark Estate and amend Table 10.2 Total Zoned Lands accordingly.</p> <p>(ii) No change</p> <p>2-3. No change</p>	
	<p>SEA/AA Response:</p> <p>Caherconlish National School is constrained by residential development, which has occurred surrounding the site. The proposed additional zoning future proofs the expansion of the school and is considered a positive approach in terms of compact growth of lands located in proximity to the existing school.</p>	

Part B

3.0 Proposed Amendments to Proposed Caherconlish Local Area Plan 2023 – 2029

(To be read in tandem with Part A)

Note: The following sets out amendments, which include text to be omitted ~~struck through in red~~ and wording to be inserted underlined in green. Where policies or objectives are proposed to be included or amended, the policy/objective numbers of those in the Proposed Plan may need to be revised.

3.1 Amendments to Proposed Local Area Plan Text

Chapter 4 Town Centre First Approach

1. Insert the following text into Chapter 4 Section 4.3 Town Centre Health Check:

Limerick City and County Council have been proactively working to address vacancy and dereliction across Limerick. The active land use management tools available to the Council are underpinned by Derelict Sites Act, 1990 (as amended), the Urban Regeneration and Housing Act 2015 (for vacant sites), Residential Zoned Land Tax and key Government policies such as Town Centre First, Our Rural Future, and Housing for All. In addition, the Council is committed to working with property owners to reactivate long-term vacant homes and unused properties for sustainable productive use and promote public funding opportunities such as Croí Cónaithe.

The Council has a proactive regime in place, which aims to tackle the issues of dereliction and vacancy throughout Limerick. A dedicated team within the Council work on a continuous basis seeking to reduce vacancy and dereliction, through the various tools available, including compulsory purchase of vacant and underutilised properties.

The Dereliction, Vacancy and Re-Use Team of the Council will continue to engage with property owners to advise on remedial measures and give guidance on schemes and supports available to bringing vacant and derelict properties back into productive use.

2. Insert the following new objective into Section 4.3 Town Centre Health Check

Objective ED O4: Active Land Management: it is an objective of the Council to:

(a) Support and facilitate the reuse and revitalisation of derelict, vacant and underutilised sites and disused buildings throughout Caherconlish for residential, economic, community and leisure purposes.

(b) Promote and facilitate the re-use of under-utilised or vacant lands/buildings in Caherconlish through the active land management mechanisms such as the Derelict Sites Act, 1990 (as amended), the Urban Regeneration and Housing Act 2015 (for vacant sites), Residential Zoned land Tax and also through key Government guidance policies such as Town Centre First, Our Rural Future, and Housing for All and any replacements thereof. The Council will continue to engage with property owners to advise on remedial measures and give guidance on schemes and supports available to bringing vacant and derelict homes back into productive use.

3. Amend text in Chapter 4 Section 4.4 Retail Strategy as follows:

Remove text in Section 4.4 Retail Strategy as follows:

~~Development proposed on the ground floor in the village centre will be restricted to shopping and related services with active frontages to address the street~~

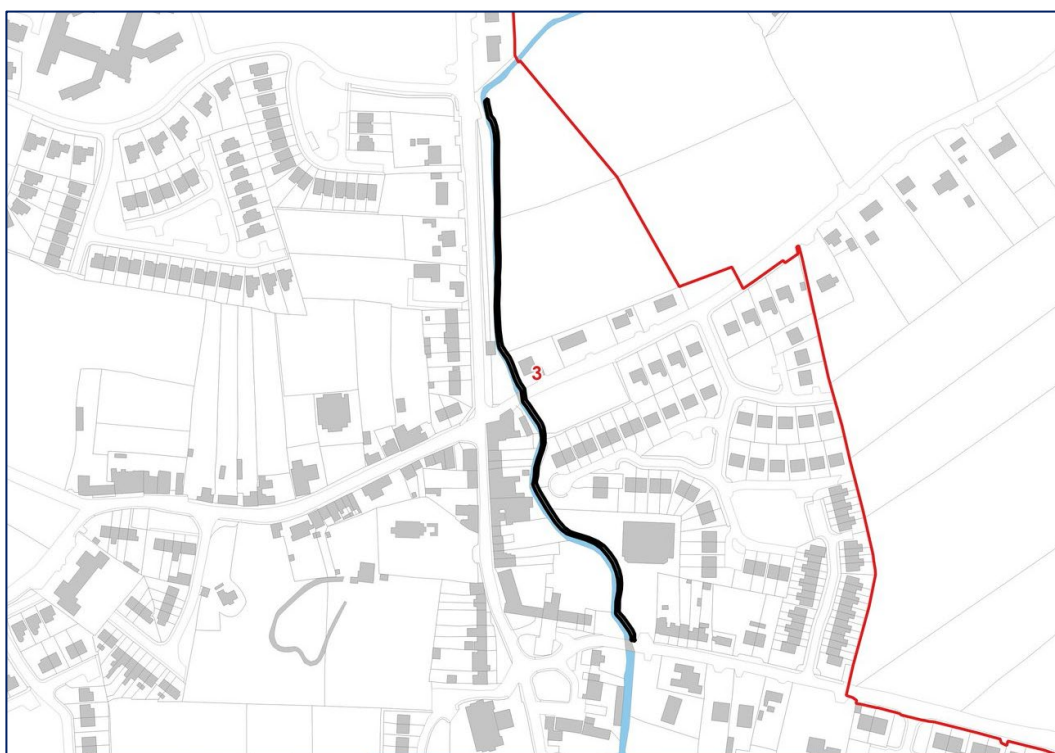
Amend Objective ED P4: Retail Development (c) as follows:

(c) ~~Ensure that~~ Encourage proposals at ground floor level within the village centre are ~~restricted to~~ used for retail uses. Where viable retail cannot be sustained, then alternative uses for the property/unit will be considered. Storage use will not be permitted as the primary use in this location;

4. Amend text in **Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles** as follows:

The proposed river walk begins north of the village centre, with access proposed opposite the estate of Ceol na Habhann on the R513. The route continues behind the former library parallel to the R513 Limerick Road through the 'Open Space and Recreation' zoning designation and continues east, terminating at ~~of~~ the village centre. ~~to the south of the settlement boundary.~~

Amend Opportunity Site 3 in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles to provide for the revision to Groody River Walk. Map amended to the following:



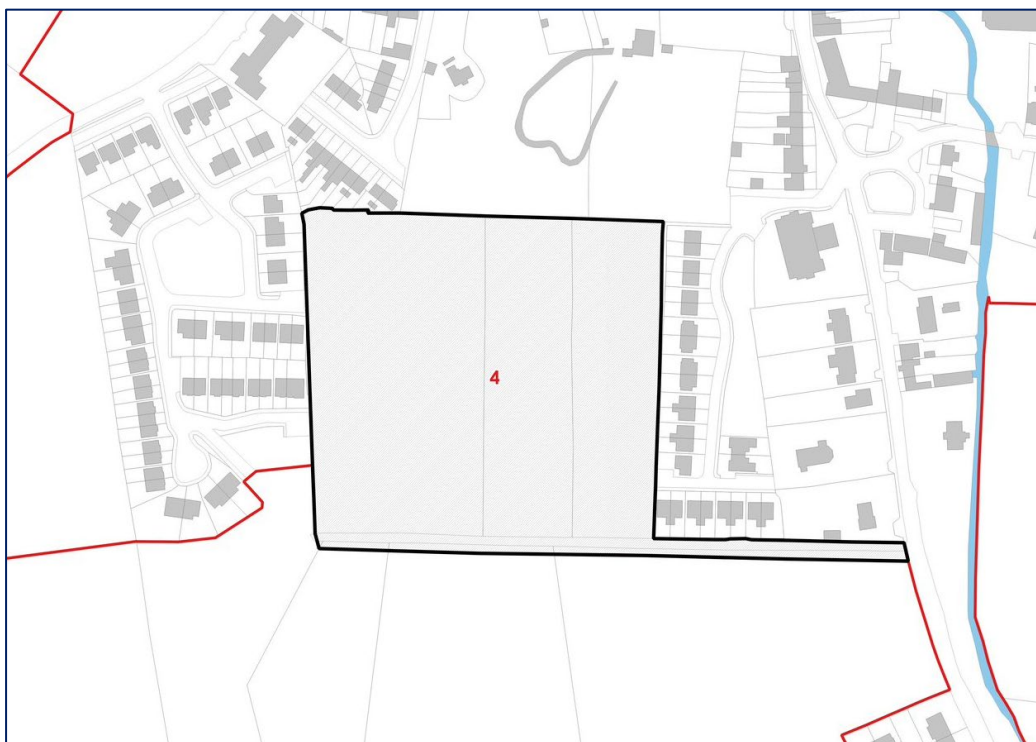
5. Add the following text into *Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles* under Opportunity Site 4:

Detailed masterplan will be required showing proposed connectivity and linkages and access points as part of any development proposal. Vehicle access shall be provided via the R513 while pedestrian and cycle access shall be prioritised to create

additional linkages and permeability into Opportunity Site 1, the Square, and where possible, surrounding residential estates.

Amend Opportunity Site 4 in Table 4.2 Caherconlish Opportunity Sites and Development Potential/Principles to include additional lands zoned as New Residential as per zoning 'Amendments to Maps' - change No. 2.

Map amended to the following:



Chapter 8 – Climate Action, Environment and Heritage

1. Add the following text to Section 8.3.1 Archaeological Heritage: Archaeological heritage is comprised of all material remains of past societies with the potential to add our knowledge of such societies.
2. Add the following text as part (g) to Objective CH O1 in Chapter 8 as follows: (g)Promote the appropriate adaption of built heritage to assist in addressing the effects of climate change.

Chapter 9 – Infrastructure and Utilities

1. Amend **Objective IU O3: Surface Water Management and SuDS** - It is an objective of the Council to: a) Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater, including reducing the discharges of pollutants or contaminants to waters in accordance with the Proposed Ireland River

Basin Management Plan for Ireland ~~2012~~-2022-2027 (DHPLG) and associated Programme of Measures.

2. Amend and add the following text to Objective IU O3 as follows:
Objective IU O3 (c) Require all new developments, to include Sustainable Urban Drainage Systems SuDS (SuDS) to control surface water outfall and protect water quality, and where possible, a nature based approach should be considered and incorporated.
3. The following sentence to be added under Section 9.3 of the plan:
Regard will be had to the Government's best practice guidance document, Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (December 2021).
4. Amend Objective IU O1 - Wastewater Infrastructure: Part B as follows:
b) Ensure adequate wastewater infrastructure is available to cater for existing and proposed development, in collaboration with Irish Water, avoiding any deterioration in the quality of receiving waters and ensuring discharge meets the requirements of the Water Framework Directive. This includes the separation of foul and surface water through the provision of sewerage networks and nature based rainwater management measures.
5. Add a Part (c) to Objective IU O2: Water Supply Infrastructure as follows:
Objective IU O2 - Water Infrastructure:
(c) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements, including innovative solutions in specific situations
6. Amend Objective IU O3 to include a part 'f' as follows:
Objective IU O3: Surface Water Management and SuDS
(f) To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.
7. Add Objective IUO4(e) as follows:
(e) Ensure future development of lands within Flood Risk Zone A/B is in accordance with the plan-making Justification Tests in the SFRA.
8. Amend Objective IUO4 in Chapter 9 to add a Part (f) as follows
(e) Ensure that any future development preserves access requirements for the maintenance of Arterial Drainage Schemes and Drainage Districts.

9. The following sentence to be added under Chapter 9 Section 9.3:

Regard will be had to the Government's best practice guidance document, Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (December 2021).

Chapter 10 – Land Use Framework and Settlement Capacity Audit

Amend Table 10.2 Total Zoned Lands with updated land zone areas

Zoning	Total Area Zoned in 2023 LAP - ha	Total Area Zoned in 2012 LAP - ha
Agriculture	1.624	19.74
Enterprise and Employment	5.892	8.06
Education and Community Facilities	2.711 <u>5.234</u>	7.67
Utilities	No designation	0.29
New Residential Total	6.53 <u>6.835</u>	7.1
Phase 1	No designation	3.85
Phase 2	No designation	2.7
Existing Residential	24.866 <u>24.810</u>	27.70
Residential Serviced Sites	2.085	3.52
Phase 1	No designation	2.09
Phase 2	No designation	1.74
Open Space and Recreation	5.655	9.06
Village Centre	2.461	2.15

Chapter 11 – Monitoring and Evaluation

Insert a new action into Chapter 11-Monitoring and Evaluation Table 11.1: Draft Caherconlish Local Area Plan – Plan Actions as follows:

Undertake a further Health Check Survey within the lifetime of the Plan in order to monitor commercial and residential vacancy throughout Caherconlish.

3.2 Amendments to Settlement Capacity Audit


10.6 Settlement Capacity Assessment - Tiered Approach to Zoning


In accordance with Appendix 3 of the National Planning Framework (NPF), the tiered approach to zoning has been applied to zoned lands as laid out in Table 10.3 below. Tier 1 refers to lands that are adequately serviced and can connect to existing services (road, path, public lighting, water supply and surface water drainage). Tier 2 lands refer to lands that have constraints terms of connecting to one or more services but have the potential to become fully serviced over the lifetime of the Plan.

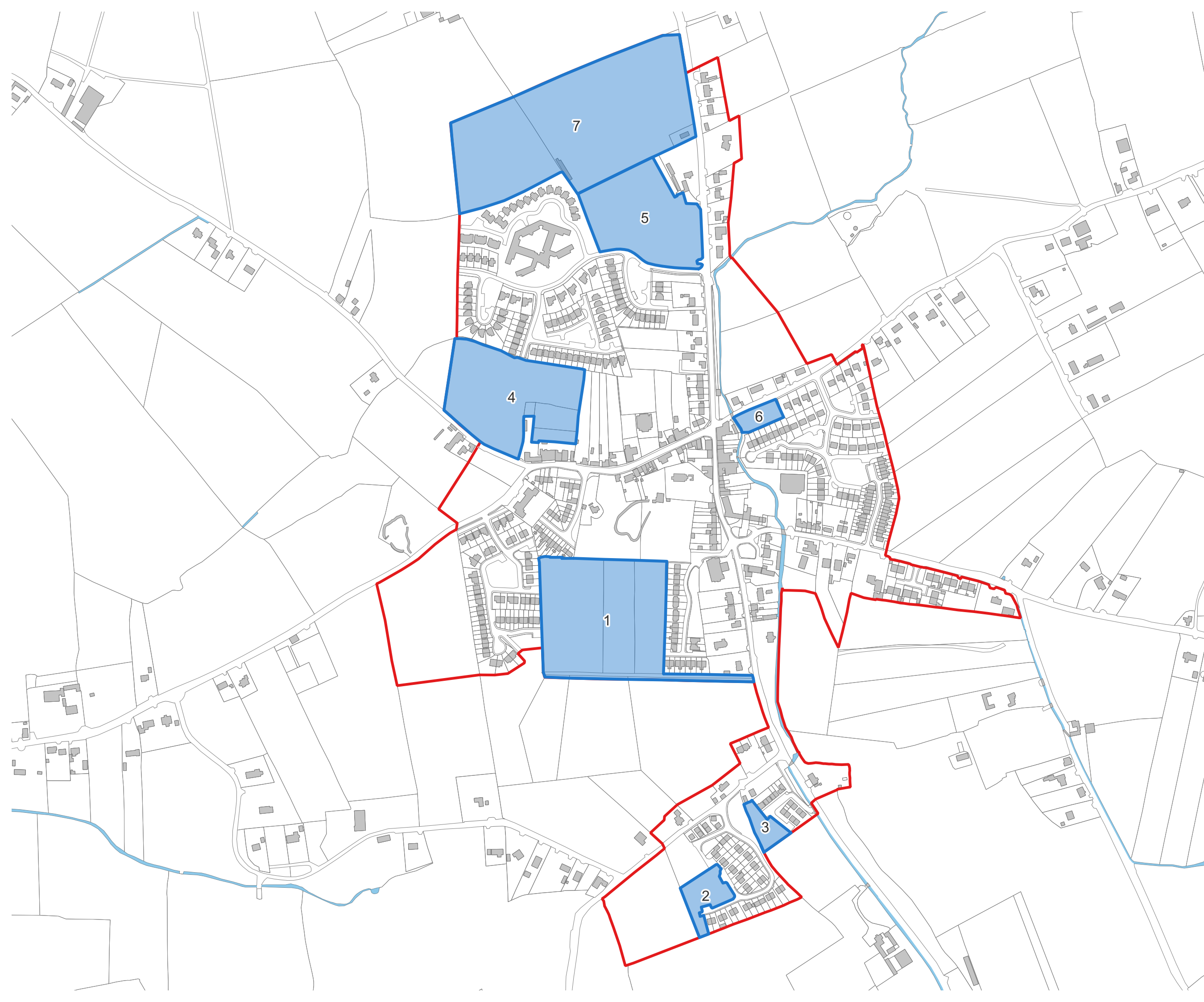
The Settlement Capacity Assessment sets out the sites identified for new residential development, serviced sites and enterprise and employment with respect to availability of key infrastructure to ensure that these lands are developable over the lifetime of the plan. The sites are identified as being serviced (utilities), served by public transport and community infrastructure and satisfies the principles of the Town Centre First policy and compact growth, all promoted by higher level spatial plans. Where existing infrastructure is located in close proximity to a site and can potentially extended to service the site, these services have been indicated as available. It should be noted that the table below is for information purposes only and developers are advised to avail of pre-planning consultation with the service providers regarding development of these lands prior to submitting a planning application.

Site No.	Zoning	Area (ha)	Density	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Timeline /Cost	Comments if applicable	Tier
1	New Residential	3.280 (3.584)	22 units/ha	✓	✓	●	✓	✓	✓	✓	✗	✓	S	<ul style="list-style-type: none"> - Opportunity Site No. 4 (refer to Section 4.5 Opportunity Sites for Development Potential and Guidance) - Infill site <150m from Village Centre 	1
2	New Residential	.407	22 units/ha	✓	✓	●	✓	✓	✓	✓	✗	✓	S	<ul style="list-style-type: none"> - LCCC Housing Department Approved Pipeline Site under LCCC Housing Delivery Action Plan 2022-2026 	1
3	New Residential	.234	22 units/ha	✓	✓	●	✓	✓	✓	✓	✗	✓	S	<ul style="list-style-type: none"> - LCCC Housing Department Approved Pipeline Site under LCCC Housing Delivery Action Plan 2022-2026 	1
4	New Residential	2.094	22 units/ha	✓	✓	●	✓	✓	!	!	✗	✓	M €314K	<ul style="list-style-type: none"> - Opportunity Site No. 5 (refer to Section 4.5 Opportunity Sites for Development Potential and Guidance) - Part of site is backland/infill site <350m from Village Centre in close proximity to the Primary School, access and infrastructural works with be required to be delivered by the developer - Active Travel funding application sought for safety works outside Caherconlish National School – works proposed at junction with High Street. - Stormwater Infrastructure in Ceol na hAbhainn estate (to the North of the site) and on High Street (to the East of the site). 	2
5	Residential Serviced Sites	2.085	10 units/ha	✓	✓	✓	✓	✓	✓	✓	✗	✓	S	<ul style="list-style-type: none"> - Infill site <320m from village centre 	1
6	Village Centre	.22	22 units/ha	✓	✓	✓	✓	✓	✓	✓	✗	✓	S	<ul style="list-style-type: none"> - 7 units granted village centre (21550) 	1
7	Enterprise and Employment	5.89	N/A	✓	✓	✓	✓	✓	✓	✓	✗	✗	S	<ul style="list-style-type: none"> - Lands located <700m from village centre. Applicants will also have to provide walking/cycling infrastructure to connect with the village centre. A Masterplan shall be prepared for the overall lands. 	1

Legend

 Settlement
Capacity Audit Sites

 Caherconlish
LAP Boundary



3.3 Amendments to Maps

Amendments to Land Use Zoning Map:

1. Amend the Land Use Zoning Map to zone 2.465ha as 'Education and Community' on the L1149 adjacent to Castlepark Estate.
2. Amend the Land Use Zoning Map by extending Opportunity Site 4 to zone an additional 0.304ha as 'New Residential'.
3. Amend the Land Use Zoning Map to zone .058ha from 'Existing Residential' to 'Education and Community' at the Garda Station.

Amendments to Flood Map

1. Amend the Flood Map to zone 2.465ha as 'Education and Community' on the L1149 adjacent to Castlepark Estate.
2. Amend the Flood Map by extending Opportunity Site 4 to zone an additional 0.304ha as 'New Residential'.
3. Amend the Flood Map to zone .058ha from 'Existing Residential' to 'Education and Community' at the Garda Station.



Amendment to Amenity and Sustainable Transport Map:

1. Amend Zoning Map and Opportunity Sites Map to include a revision of the length of the proposed Groody River Walk terminating at the Village Square.

Amendment to Settlement Capacity Map

1. Amend Settlement Capacity Map to include amended Site No. 1

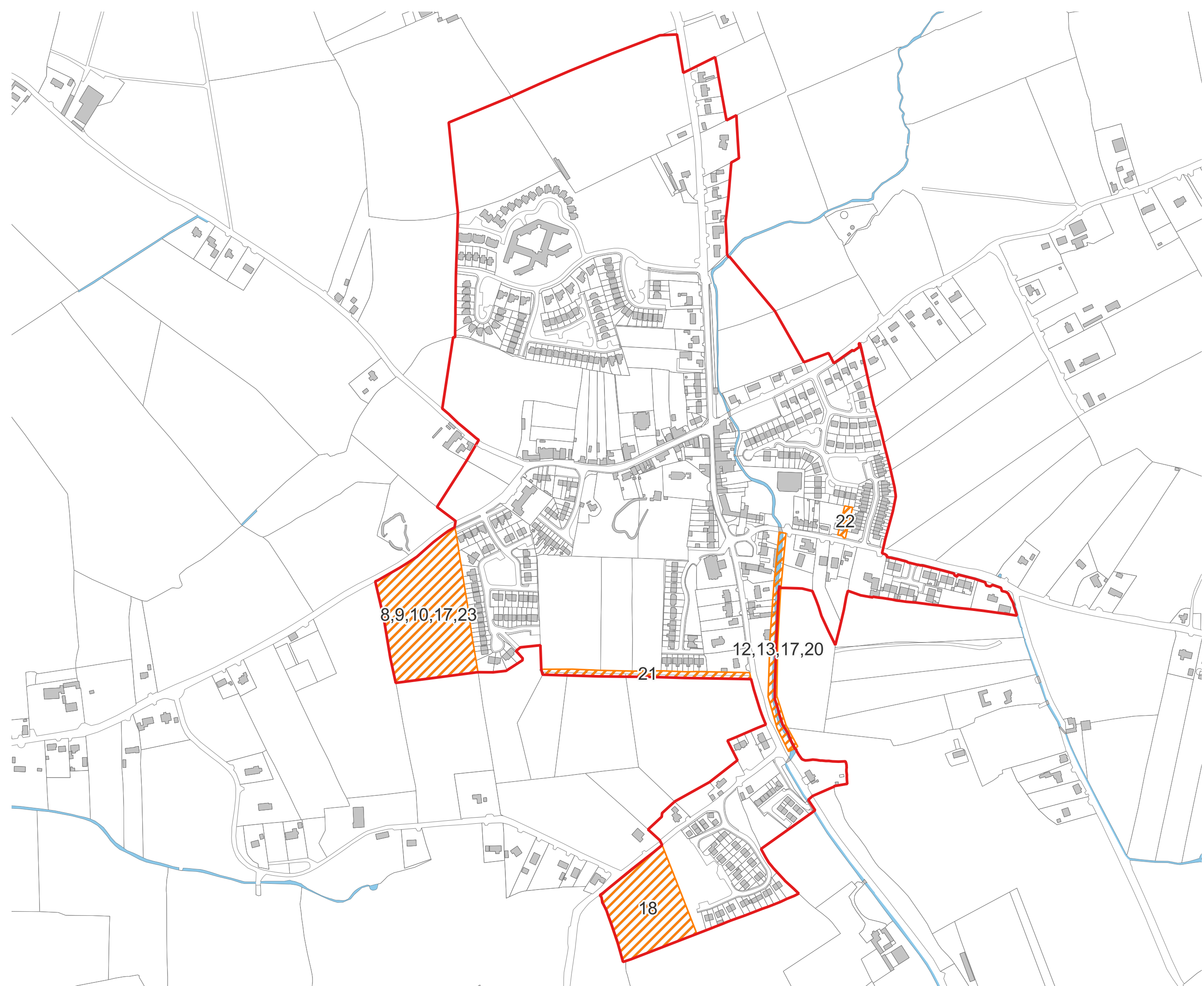
Legend

-  Submissions
-  Caherconlish
LAP Boundary

Forward Planning
Economic Development and
Enterprise Directorate

Merchants Quay, Limerick
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E-mail: forwardplanning@limerick.ie

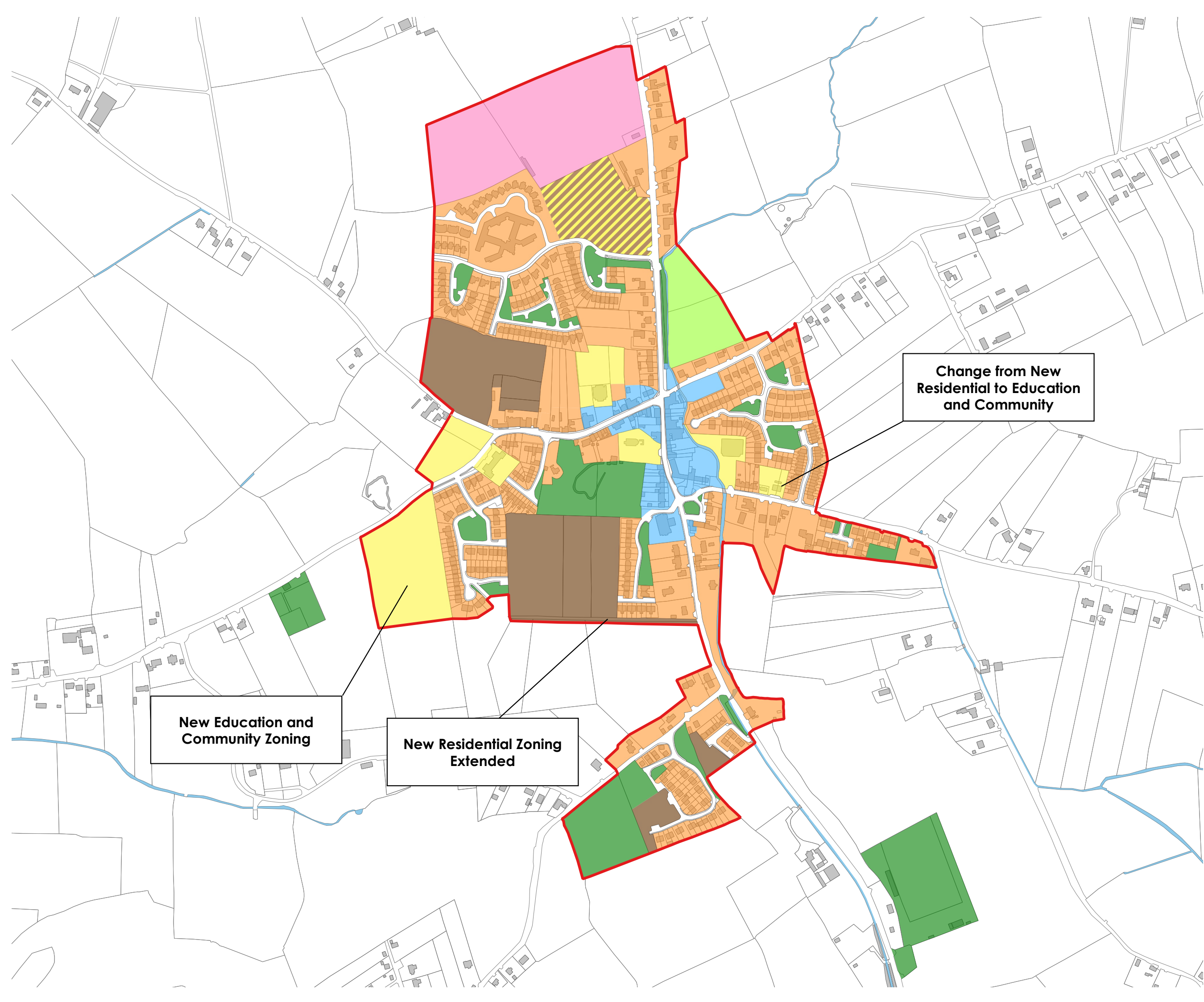
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**Chief Executives Report
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Received on Draft Plan**

Legend

- Agriculture
- Education and Community
- Enterprise and Employment
- Existing Residential
- New Residential
- Open Space and Recreation
- Residential Serviced Sites
- Village Centre
- Caherconlish LAP Boundary



Chief Executives Report
on Submissions
Received on Draft Plan

Legend

- Agriculture
- Education and Community
- Enterprise and Employment
- Existing Residential
- New Residential
- Open Space and Recreation
- Residential Serviced Sites
- Village Centre
- Caherconlish LAP Boundary
- Opportunity Sites

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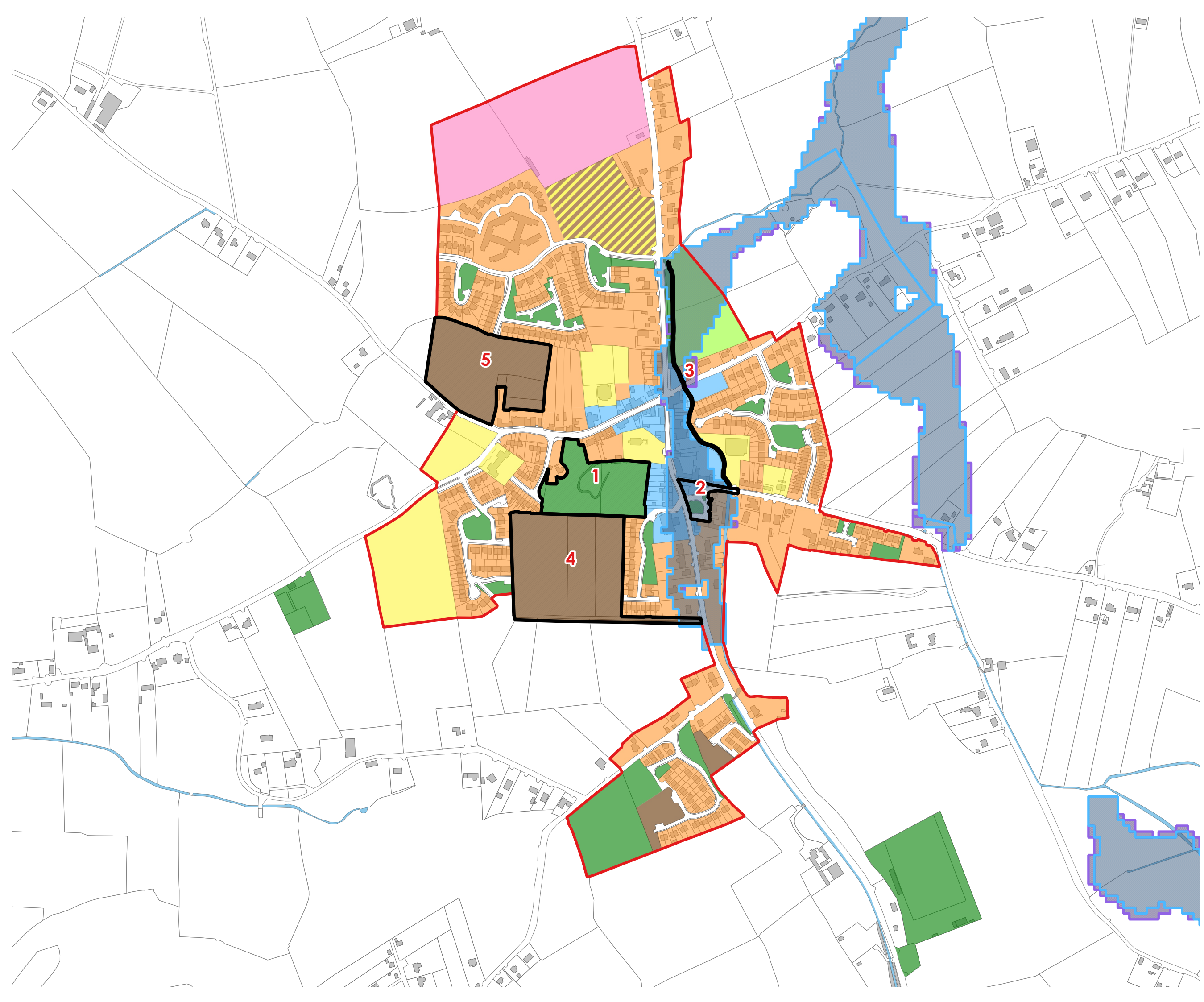
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**Chief Executives Report
on Submissions
Received on Draft Plan**

Legend

- Agriculture
- Education and Community
- Enterprise and Employment
- Existing Residential
- New Residential
- Open Space and Recreation
- Residential Serviced Sites
- Village Centre
- Flood Zone A
- Flood Zone B
- Opportunity Sites
- Caherconlish LAP Boundary



Legend

- ★ Playground
- Existing Pedestrian Routes/Links
- - Proposed Pedestrian Routes/Links
- Open Space and Recreation
- Caherconlish LAP Boundary

Proposed Pedestrian Route
Removed

Forward Planning
Economic Development
and Enterprise Directorate

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DATE: December 2022		DWG. No: CHAT/23-29/R5	
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PART C

STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING AND APPROPRIATE ASSESSMENT SCREENING

The changes proposed are not significant and therefore alterations to the Strategic Environmental Assessment Screening and Appropriate Assessment Screening Reports are not required.

PART D

UPDATED STRATEGIC FLOOD RISK ASSESSMENT

Table of Contents

1.0 Introduction

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3.0 Flood Risk Identification

3.1 Introduction – Stage 1 Flood Risk Identification

3.2 Flood Risk Indicators

3.3 Conclusion of Stage 1 SFRA

4.0 Stage 2 Strategic Flood Risk Assessment

4.1 Introduction

4.2 Assessment of information outlined above and Delineation of Flood Zones

4.3 Flooding from Other Sources

4.4 Flood Defences

4.5 Flood Risk Zone Mapping

4.6 Climate change considerations

5.0 Recommendations and Integration with Local Area Plan

5.1 Introduction

5.2 Integration of Provisions of Flood Risk Assessment and Flood Management

6.0 Conclusions

Appendix I - Flood Justification Tests

1.0 Introduction

The preparation of the Caherconlish Local Area Plan has been subject to a Strategic Flood Risk Assessment (SFRA), in accordance with The Planning System and Flood Risk Management - Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Department of the Environment, Community and Local Government Circular PL 2/2014. The SFRA provides an assessment of flood risk and includes mapped extents of Flood Risk Zones. This report considers flood extents to inform the preparation of a land use plan.

The Local Area Plan is a land use plan and provides an overall strategy for the proper planning and sustainable development of the functional area of the village of Caherconlish over the six-year period 2023 – 2029. The principles on which the plan has been developed upon is compact growth, promotion of a self-sustaining settlement supported by sustainable transport, to promote the growth of the village, in an environmentally sustainable manner.

Caherconlish is located approximately 10 kilometers (6 miles) southeast of Limerick City. The village is located just to the south of the main Limerick to Waterford National Primary Road, (N24) providing ease of access to Limerick City, North Cork and the southeast of the County. The village itself is traversed by the R513 linking the village to Hospital, Ballylanders and onto Mitchelstown in North Cork. The village is sited predominantly on the east side of the Groody River, which flows in a south-north direction through the village. The Limerick Development Plan 2022 – 2028 identifies Caherconlish as Level 3 settlement in Limerick. These settlements provide local retail and business services for their surrounding areas. Fig. 1 below shows the location of Caherconlish relative to Limerick City and the Groody River.

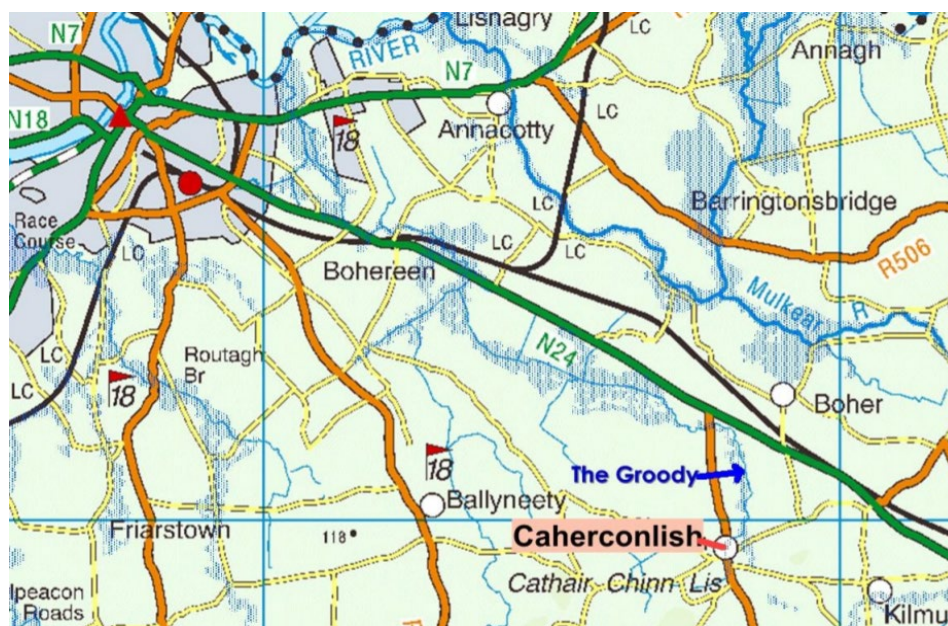


Figure 1: Caherconlish village located on the banks of the Groody River

2.0 Flood Risk Management Policy

2.1 EU Floods Directive

The European Directive 2007/60/EC provides the overarching European legalisation, in relation to managing flood risk, it seeks to reduce and manage the risks that flooding pose to humans, the environment, cultural heritage and the environment. The legalisation applies to both inland and coastal water sources and requires EU states to:

- Carry out a preliminary assessment in order to identify the river basins and associated coastal areas, where potential significant flood risk exists;
- Prepare flood extent maps for the identified areas;
- Prepare flood risk management plans focused on prevention, protection and preparedness. These plans are to include measures to reduce the probability of flooding and its potential consequences.

Implementation of the EU Floods Directive is required to be coordinated with the requirements of the EU Water Framework Directive and the current National River Basin Management Plan.

2.2 National Flood Policy

In line with evolving European legalisation and evolving national legalisation, the government in 2004 established a Flood Policy Review Group and carried out a interdepartmental review of national flood risk management policy and carried out and approved a Flood Policy Review Report. The recommendations of the Report included appointment of the OPW as lead agency for co-ordinating delivery of flood risk management policy. The OPW carries out this role by co-ordinating the implementation of flood risk management policy and measures across three strategic areas:

- Prevention - avoiding construction in flood-prone areas;
- Protection - taking feasible measures to protect areas against flooding.
- Preparedness - planning and responding to reduce the impacts of flood events.

The review also identified a number of key measures for implementation in relation to flood risk management, most relevant to plan preparation is the "Planning System and Flood Risk Management" Guidelines published in 2009, which provide guidance to Local Authorities on plan formulation and decision making in areas at risk of flooding. The review also resulted in an enhancement of the availability of data on flood risk and reporting on flood events, which assists in decision making in relation to land use planning.

2.2.1 National CFRAM Programme

The OPW undertook the National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme in consultation with the Local Authorities and supported by external engineering consultants. The objectives of the CFRAM Programme was to:

- Identify and map the existing and potential future flood hazard and flood risk in the areas at potentially significant risk from flooding, called Areas for Further Assessment (AFAs);
- identify feasible structural and non-structural measures to effectively manage the assessed risk in each of the AFAs, and
- Prepare a set of Flood Risk Management Plans, and associated Strategic Environmental and Habitats Directive (Appropriate) Assessments that set out the proposed feasible measures and actions to manage the flood risk in these areas and their river catchments.

No CFRAM mapping was undertaken for Caherconlish. These maps have recently been updated with the National Indicative Fluvial Mapping and National Coastal Flood Hazard Mapping and probabilistic and historical ground water flood maps prepared by the Geological Survey of Ireland.

2.2.2 Flood Risk Management Guidelines

In 2009, the OPW and the Department of the Environment and Local Government (DEHLG) published Guidelines on flood risk management for Planning Authorities - **The Planning System and Flood Risk Management - Guidelines for Planning Authorities**. These Guidelines seek to establish a regime to assist with flood risk identification, assessment and management and embed this into the planning process.

The core objectives of the Guidelines are to:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The Guidelines follow the principle that development should not be permitted in flood risk areas, particularly floodplains, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development.

One of the key areas identified in the Flood Guidelines is around identifying flood risk, which is an expression of the combination of the flood probability or likelihood and the magnitude of the potential consequences of the flood event. It is normally expressed in terms of the following relationship:

Flood risk = Likelihood of flooding x Consequences of flooding

Likelihood of flooding is normally defined as the percentage probability of a flood of a given magnitude or severity occurring or being exceeded in any given year.

Consequences of flooding depend on the hazards associated with the flooding (e.g. depth of water, speed of flow, rate of onset, duration, wave-action effects, water quality) and the vulnerability of people, property and the environment potentially affected by a flood (e.g. the age profile of the population, the type of development and the presence and reliability of mitigation measures).

Flood zones are geographical areas within which the likelihood of flooding is in a particular range and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning.

There are three types of flood zones defined for the purposes of the Flood Guidelines:

- Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding);
- Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding); and
- Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding).

Flood Zone C covers all other areas that are not in zones A or B.

3.0 Flood Risk Identification

3.1 Introduction – Stage 1 Flood Risk Identification

Flood risk identification was undertaken in order to identify whether there may be any flooding or surface water management issues within or adjacent to zoned lands and consequently whether Stage 2 SFRA (flood risk assessment) should be proceeded to. Stage 1 SFRA is based on existing information on flood risk indicators based on available flood detail.



Figure 2: Groody River in the southern part of the plan area.

The Groody is the river that runs through Caherconlish and is at this stage of its development a depositing river, i.e. a river with a shallow gradient flowing through a relatively flat landscape. It is the only water course in the village with the exception of drainage ditches and as such is the main source of any potential flood risk. As part of the review of the Limerick Development Plan, JBA Consultant Engineers carried out an assessment of the existing risk in Caherconlish, no flood modelling has been complete.

While on other locations, CFRAMS provides for project-level development and zoning, the OPW submission dated 25th of November 2022 mentions that there “are few data sets available for Caherconlish”. No CFRAM mapping has been carried out for Caherconlish.

3.2 Flood Risk Indicators

Discussions regarding drainage and flooding issues took place with council engineers, which indicated the location of past flooding events in Caherconlish. Flood info.ie confirmed these locations with reports on hand from the Mulkear Drainage society (1991) and Limerick County Fire Service (2005). The flood maps (Figure 5), have been used as first step, supplemented with site visits and walkovers. It has informed the new zoning extent so that in these areas new zoning is for uses compatible with flood risk, such as agricultural uses.



Figure 3: Taken from Floodinfo.ie, this shows the concentration of Flood events in Caherconlish.

Another possible indication of flooding patterns is that of benefitting lands, i.e. lands that would benefit from flood defence to improve agricultural production.

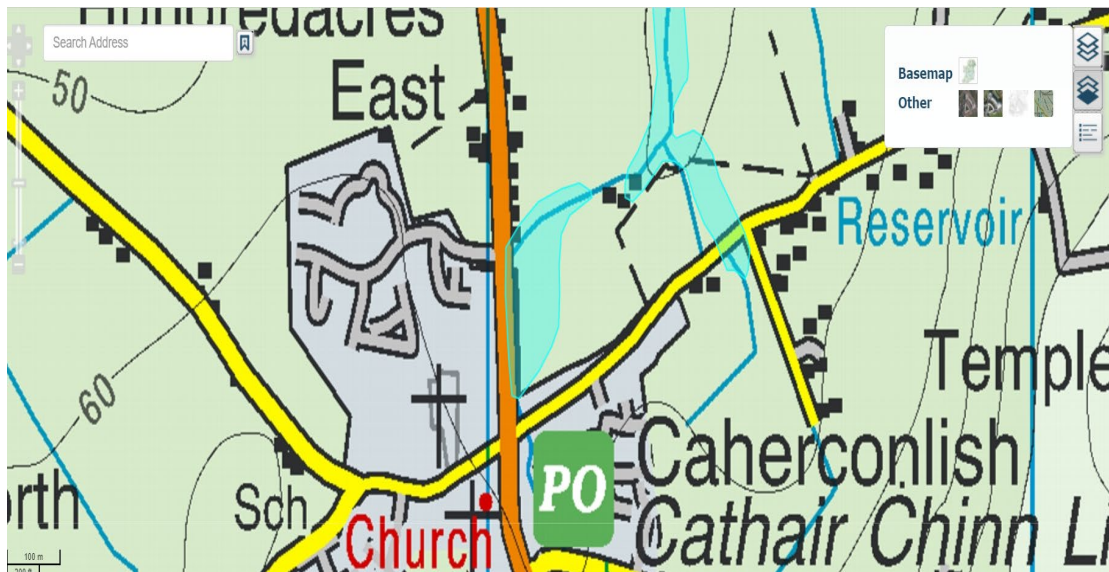


Figure 4: Benefitting lands shown in light blue in the north east of the plan area. This area is currently zoned agricultural.

3.3 Conclusion of Stage 1 SFRA

The information detailed above indicates elevated levels of flood risk in various locations across the Plan area; therefore, a Stage 2 SFRA has been proceeded to.

4.0 Stage 2 Strategic Flood Risk Assessment

4.1 Introduction

Stage 2 SFRA is being undertaken to:

- Confirm the sources of flooding that may affect zoned and adjacent areas;
- Appraise the adequacy of existing information as identified by the Stage 1 SFRA; and
- Scope the extent of the risk of flooding through the preparation of a Flood Zone Map.

4.2 Assessment of information outlined above and Delineation of Flood Zones

In order to inform the Stage 2 assessment, the village of Caherconlish was inspected, which involved numerous site visits in order to examine, the potential source and direction of flood paths from fluvial sources, locations of topographic features that coincide with the flood boundaries and to identify vegetation associated with a high frequency of flood inundation.

Three factors influence the zoning decisions in relation to these areas. The first is the existence of the flood risk as presented by historic flood reports and discussions with Local Authority personnel, the second is the presence of benefitting lands in the plan area and the third is the JBA flood assessment, carried out in 2021, as part of the review of the Limerick Development Plan. Flood modelling did not take place as the on the ground survey supported, both the historic flood reports and the benefitting lands.

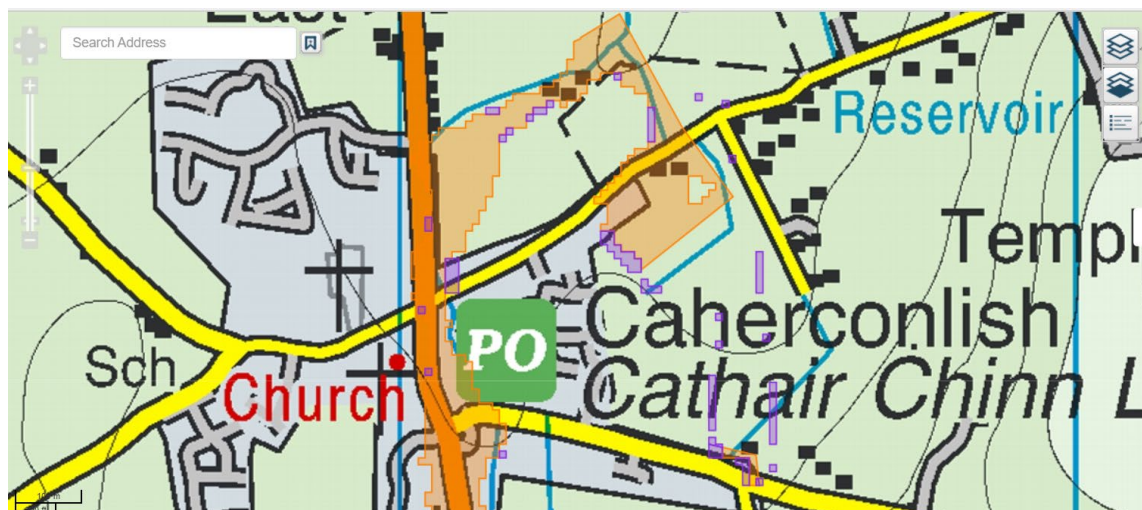


Figure 5: JBA flood mapping indicating Flood Zone A (Orange) and Flood Zone B (purple)

4.3 Flooding from Other Sources

Pluvial flood risk has not featured to great degree in flood risk assessment in Caherconlish. To date such development that has occurred in the village, has not tended to rely on attenuation or nature friendly measures to try and control water flow and run off and local rain fall events can generate considerable volumes of water. The amount of impermeable

surfaces and local topography can contribute to local flood events. In the case of Caherconlish, the steep gradient of High Street leading down towards the village centre can cause rainwater to be directed quickly towards the cross roads in the village centre and the area zoned for village centre. The plan does take this issue into account and in Objective IU O4 addresses this issue, in so far as it states that “future developments in flood prone areas are generally limited to minor developments in line with Circular PI2/2014 and the Flood Risk Management Guidelines for Planning Authorities”.



Figure 6: Illustrating the gradient from the top of high street towards the village centre.

Ground water flooding is identified on the Geological Survey of Ireland (GSI) ground water mapping as occurring close to but not in the boundaries of the Local Area Plan.

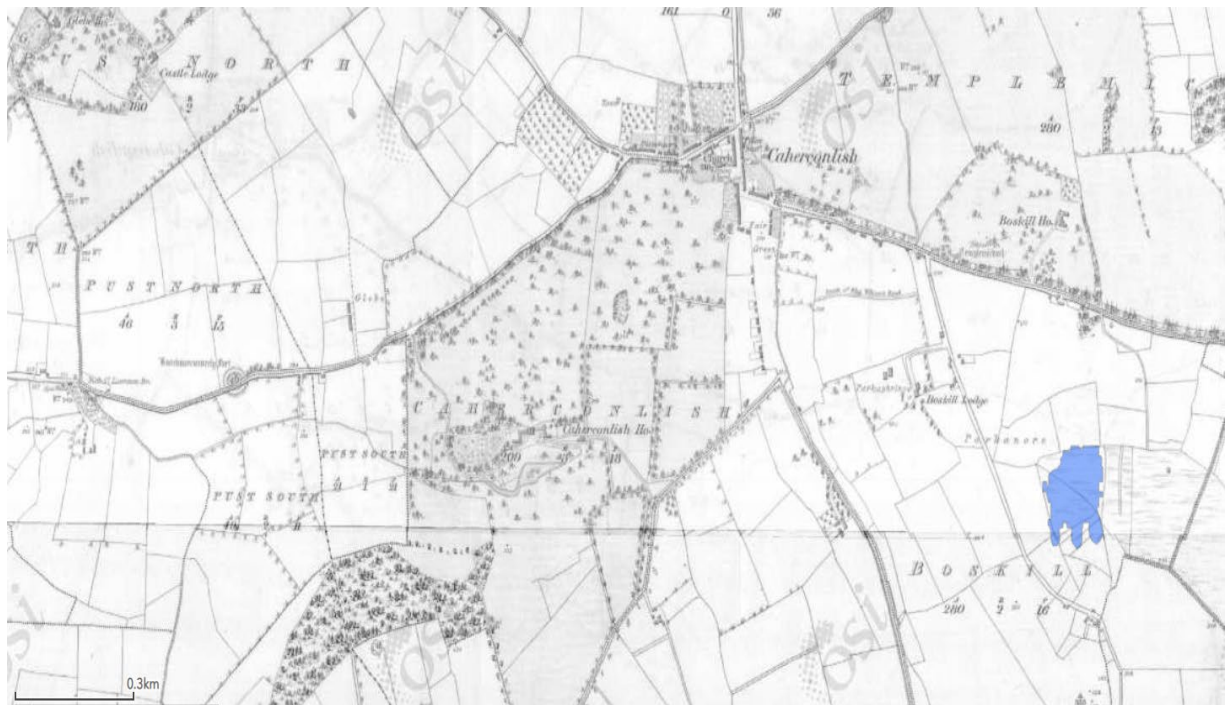


Figure 7: The area shown in blue shows ground water flooding from the GSI website (Historic Ground Water Flood maps, 2015)

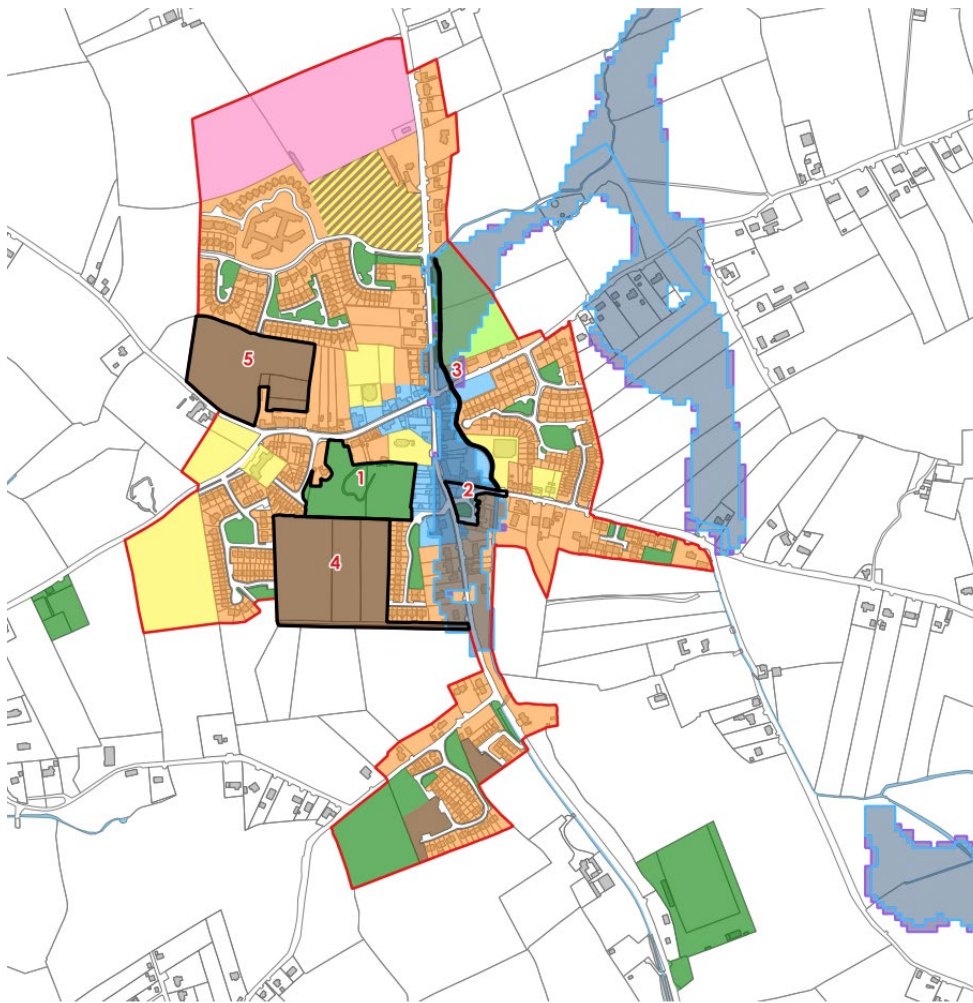


Figure 8: Flood map for Caherconlish, this also shows the groundwater flooding, to the south east, that is on the GSI map in Figure 7.

From the above it can be seen that local changes in development patterns and intensification of land usage can have an effects on overland flow and surface water movement in particular. This can exacerbated when the drainage of channels and storm water routes can be blocked by debris or when the Groody river channel might itself get blocked at a narrow points by debris. There is a narrow point behind the old library building on the southern entrance to the village and there is also the probability of the eyes of the bridges in the village getting blocked by debris.

To reduce the amount of run off in the first instance the insertion of policies which promote nature based solutions and Sustainable Urban Drainage (SuDs) have been included in the plan. This is dealt with further in Section 9.3 of the plan entitled Surface Water Management and SuDS.

4.4 Flood defences

There are no flood defences in Caherconlish.

4.5 Flood Risk Zone Mapping

A Flood Risk Map has been produced taking into account the findings of the Stage 1 and Stage 2 SFRA as detailed above. The map is illustrated below identifies Flood Zone A (darker blue) and Flood Zone B4 (lighter blue). As per the Guidelines, the flood zones in Caherconlish are as follows:

- Flood Zone A – where the probability of flooding from the River Shannon and its tributaries is highest (greater than 1% or 1 in 100 for river flooding);
- Flood Zone B – where the probability of flooding from the River Shannon and its tributaries is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding); and;
- Flood Zone C – where the probability of flooding from the River Shannon and its tributaries is low (less than 0.1% or 1 in 1000 for river flooding).

4.6 Climate change considerations

The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009 recommends that a precautionary approach to climate change is adopted due to the level of uncertainty involved in the potential effects. In this regard, the Guidelines recommends:

- Recognising that significant changes in the flood extent may result from an increase in rainfall or tide events and accordingly adopting a cautious approach to zoning land in these potential transitional areas;
- Ensuring that the levels of structures designed to protect against flooding such as flood defences, land raising or raised floor levels are sufficient to cope with the effects of climate change over the lifetime of the development they are designed to protect (normally 85-100 years); and
- Ensuring that structures to protect against flooding and the development protected are capable of adaptation to the effects of climate change when there is more certainty about the effects and still time for such adaptation to be effective

Advice on the expected impacts of climate change and the allowances to be provided for future flood risk management in Ireland is given in the OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (2009). Two climate change scenarios are considered. These are the Mid-Range Future Scenario (MRFS) and the High-End Future Scenario (HEFS). The MRFS is intended to represent a "likely" future scenario based on

the wide range of future predictions available. The HEFS represents a more "extreme" future scenario at the upper boundaries of future projections.

In addition to considering climate change factors in the SFRA, the Council have embedded the principles of Sustainable Urban Drainage Systems (SuDS) and Nature Based Solutions (NBS) into the Local Area Plan, which not only has climate benefits, but also a range of environmental benefits to support the delivery of sustainable development. The approach taken in the proposed Local Area Plan, in line with the recently adopted Limerick Development Plan 2022 – 2028, is to seek to adopt SuDS and nature based solutions as appropriate, not just on key development sites. The Council will work with developers to promote SuDS and nature based solutions on a case by case basis and tailor solutions to the specific sites. It is suggested that the following will be placed in the plan; Sustainable Urban Drainage Systems (SuDS) and Nature Based Solutions (NBS): The approach taken in the proposed Local Area Plan, in line with the recently adopted Limerick Development Plan 2022 – 2028, is to seek to adopt SuDS and nature based solutions as appropriate not just on key development sites. The Council will work with developers to promote SuDS and nature based solutions on a case by case basis and tailor solutions to the specific sites. The approach taken in the proposed Local Area Plan, in line with the recently adopted Limerick Development Plan 2022 – 2028, is to seek to adopt SuDS and nature based solutions as appropriate, not just on key development sites. The Council will work with developers to promote SuDS and nature based solutions on a case by case basis and tailor solutions to the specific sites. In draft plan there is a requirement to provide new spaces as part of developments. Though part of standard planning practice, the requirement for minimum open space provision will ensure new permeable surfaces within new developments. Similarly Section 9.3 of the Plan, *Surface Water Management and SuDS* will ensure the adoption of nature friendly solutions to the issue of surface water management. The contents of the publication *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document*, will be very useful in this regard.

Section 5 Recommendations and Integration with Local Area Plan

5.1 Introduction

In order to comply with The Planning System and Flood Risk Management - Guidelines for Planning Authorities and Department of the Environment, Community and Local Government Circular (PL 2/2014) and contribute towards flood risk management within the Plan area, the recommendations below have been made by the SFRA process.

- Previously undeveloped lands within Zones A or B should not be zoned for incompatible uses, unless a Justification Test is passed (including a planning conclusion that there are no alternative locations available for accommodating such uses). With respect to previously developed lands, the potential conflict between zonings and highly vulnerable development will be avoided by applying a limiting land use policy approach, as outlined in Objective IU O5 shall be applied on these lands. Full details of all flood justification tests are included in Appendix 1.
- Incorporate policies and objectives to manage surface water in line with Sustainable Urban Drainage Systems and nature based solutions.

As rain fall events are likely to become more frequent this places more importance on elements of surface water management such as SuDS. With this in mind it is considered that all new residential areas zoned in the plan, will from the outset, incorporate nature based approaches to surface water management solutions as part of planning applications. This is already reflected in text in the plan dealing with Opportunity sites in the draft plan. In addition the area zoned for Education and Community and the proposed park area are to remain zoned as such with the proviso that any appropriate development in them maximise the amount of permeable surfaces should paths and play grounds be constructed.

It also considered that the flood benefitting lands located to in the north east part of the land through their agricultural zoning could function as a possible flood residence area. This land is 0.6m below the road level and below the level of existing residential zoned lands to the west. As such it would be useful as spill-over area for possible flooding from the Groody River and would have adequate area to fulfil this function. This would become more important over time as due to climate change, flood events are likely to become more frequent and more severe.



Figure 9: Agricultural lands in the north east of the Plan area.

5.2 Integration of provisions of Flood Risk Assessment and Flood Management into the Local Area Plan

In the formulation of the Local Area Plan to date, the Council have sought to ensure that appropriate integration of the recommendation of the Strategic Flood Risk Assessment for the Draft Caherconlish Local Area Plan has taken place, in order to comply with the Flood Guidelines and the proper planning and sustainable development of the area. Objectives as follows are critical to complying with the relevant legalisation:

- Objective IU O3 – Surface Water Management and SuDS – which relates directly to surface water management and protecting surface water resources
- Objective IU O4 – Flood Risk Management – which seeks to comply with the Flood Guidelines and Circular PL2/2014;

Coupled with key policies and objectives in the Limerick Development Plan 2022 – 2028, which are as follows:

- Policy CAF P5 – Managing Flood Risk - It is a policy of the Council to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate lands, in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any subsequent document) and the guidance contained in Development Management Standards and the Strategic Flood Risk Assessment (SFRA).

- Objective CAF O20 – Flood Risk Assessments – It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications in Flood Zones A and B and consider all sources of flooding (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary.
- Objective IN O12 – Surface Water and SuDS – The Development Plan sets out that there are many approaches to management of surface water that take account of water quantity (flooding), water quality (pollution), biodiversity (wildlife and plants) and amenity and these are collectively referred to as Sustainable Urban Drainage Systems (SuDS). The use of SuDS to address surface water and its diversion from combined sewers is encouraged, in particular, in infill/brownfield sites and higher density areas as appropriate.

It is considered that the approach outlined above and the policies and objectives of the Limerick Development Plan and the Draft Caherconlish Local Area Plan, provide a robust approach to support the Plan making process.

6.0 Conclusion

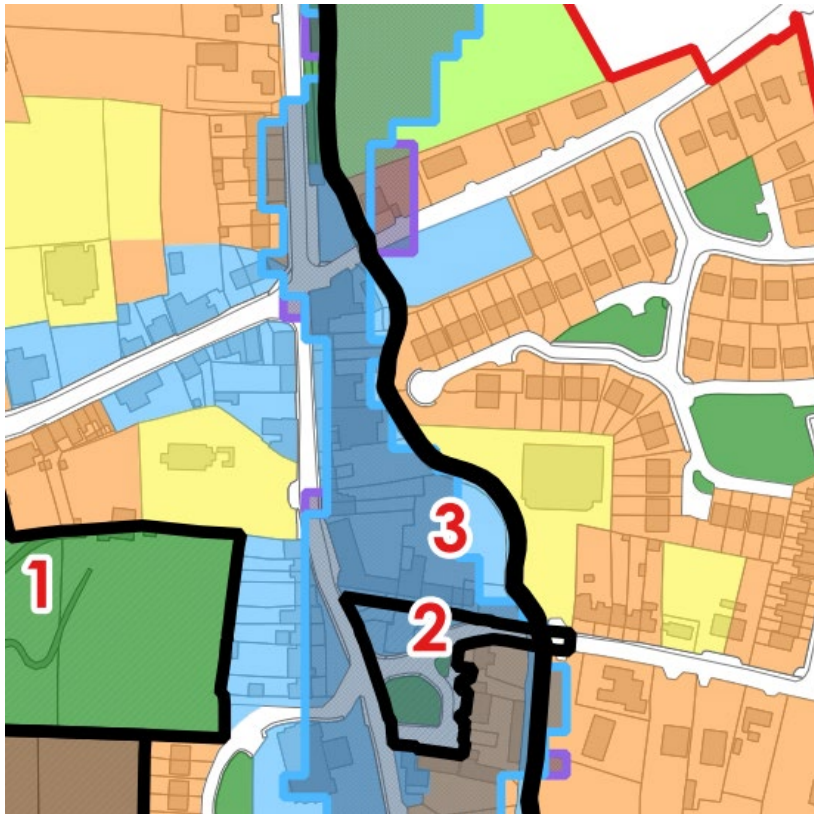
Stage 2 SFRA has been undertaken as part of the Plan-preparation process and the SFRA has informed the preparation of the Plan. The SFRA has mapped boundaries identifying areas at risk of flooding, taking into account many factors to determine the extent of flooding. In the preparation of this Local Area Plan, significant rationalisation of the zoning pattern has been carried out, the Council have, in so far as possible sought to avoid zoning of lands at flood risk or have zoned lands for water compatible uses. The Council have also sought to incorporate nature based solutions and blue green infrastructure measures into the plan, as a means of dealing with surface water, while also benefitting climate action.

Appendix I - Flood Justification Tests

As per Section 4.2 of Flood Guidelines, Flood Justification Tests has been undertaken for lands zoned in the Draft LAP, which are identified as liable to flooding, according to the information available for Caherconlish. These lands are in the main are developed or unsuitable for development and where unsuitable for development have been zoned for purpose of agricultural use or Open Space and Recreation, which will generally only permit water compatible uses.

(a) Lands located in the village core zoned Village Centre

1	<p>The urban settlements is identified for growth under the National Planning Framework, Regional Economic and Spatial Strategy, statutory plans prepared under the Planning and Development Act 2000 as amended, relevant Directives and the Planning Guidelines.</p> <p>Caherconlish is a Level 3 Settlement in the settlement hierarchy, identified in the Limerick Development Plan 2022 – 2028. The Limerick Development Plan promotes Level 3 settlements, as development centres for population growth sustaining a wide range of functions, services and employment opportunities supporting its hinterland. In line with National Policy Objective 3c, 30% of all new homes targeted within Level 3 settlements shall be within the existing built-up area of the village. Part of the lands within the village centre, are identified as being risk as flooding, however, the lands are also the core of the village and in line with national, regional and local planning policy critical to the overall development of the village centre, will facilitate consolidation and by in large is brown field or infill lands.</p>
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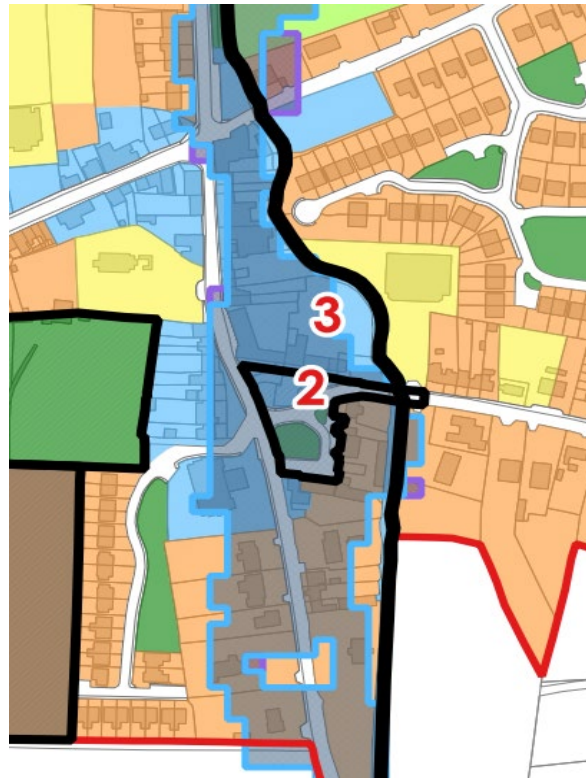
2	<p>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</p>	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement	<p>The lands are proposed to be zoned village centre, reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.</p>	
(ii) Comprises significant previously developed and/or under-utilised lands	<p>These lands are already developed and currently occupied by existing uses as per their proposed zoning objective.</p>	
(iii) Is within or adjoining the core of an established or designated urban settlement	<p>The lands are zoned village centre and located in the core of the village.</p>	
(iv) Will be essential in achieving compact or sustainable urban growth	<p>The redevelopment on these lands will contribute to compact urban growth aligned to higher-level spatial policy.</p>	
(v) There are no suitable alternative lands for the particular	<p>The lands are currently developed.</p>	

	use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement	
3	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the local area plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	The extent of Flood Zone A/B across the village centre zoning follows the line of the Groody River.
4	Conclusion of the Justification Test	
Given the measures above, the objectives of the Draft LAP, the Planning Authority is satisfied that the proposed zoning of these lands as village centre for development is appropriate subject to more detailed site-specific flood risk assessment to be submitted as supplementary information with planning applications on these lands, which may be made in the future. Any developments in these areas are to be limited to developments that are minor in nature and will not result in in increased risk of flooding elsewhere in line with Section 5.28 of the Flood Guidelines and PI2/2014.		

(b) Existing Residential

1	<p>The urban settlements is identified for growth under the National Planning Framework, Regional Economic and Spatial Strategy, statutory plans prepared under the Planning and Development Act 2000 as amended, relevant Directives and the Planning Guidelines.</p>	
	<p>Caherconlish is a Level 3 Settlement in the settlement hierarchy, identified in the Limerick Development Plan 2022 – 2028. The Limerick Development Plan promotes Level 3 settlements, as development centres for population growth sustaining a wide range of functions, services and employment opportunities supporting its hinterland. In</p>	

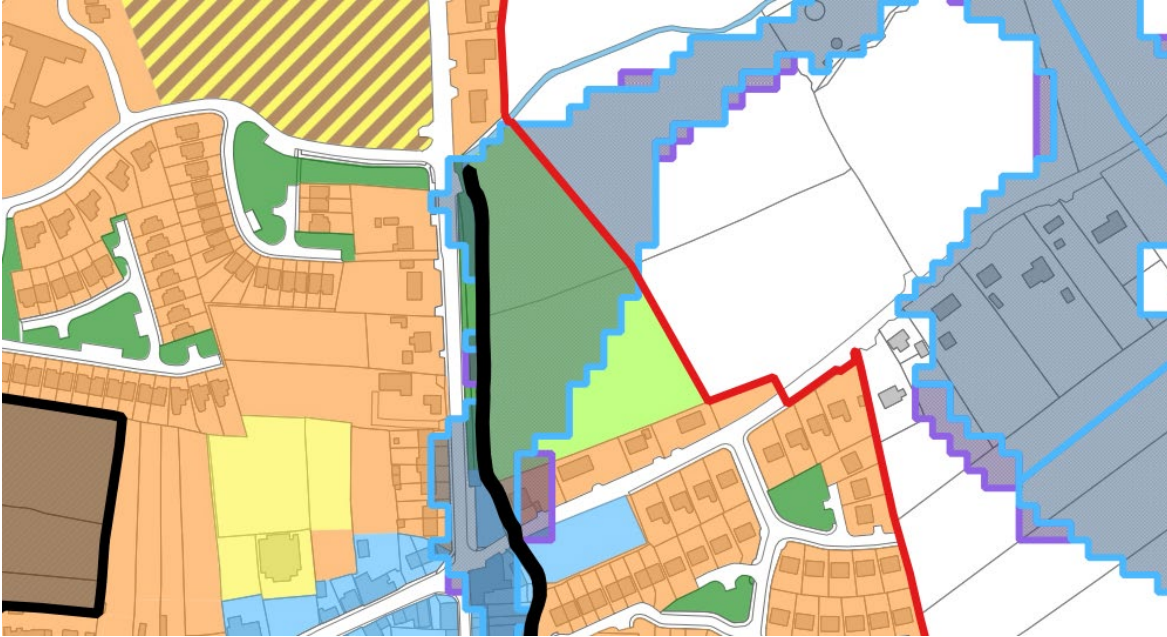
line with National Policy Objective 3c, 30% of all new homes targeted within Level 3 settlements shall be within the existing built-up area of the village. Part of the lands within the village centre, are identified as being risk as flooding, however, the lands are also the core of the village and in line with national, regional and local planning policy critical to the overall development of the village centre, will facilitate consolidation and by in large is brown field or infill lands.



2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement	The lands are already developed and the zoning reflects their existing uses. They are a reflection of the historical development of the village, in particular that of the central part of the village. Given the emphasis of the NPF and the RSES on the use of existing development sites, these areas are essential to the viability of the settlement.	
(ii) Comprises significant previously developed and/or under-utilised lands	These lands are already developed and currently occupied by existing uses as per their proposed zoning objective.	

	(iii) Is within or adjoining the core of an established or designated urban settlement	The lands are existing residential and located in the centre of the village.
	(iv) Will be essential in achieving compact or sustainable urban growth	The redevelopment and continued use of these lands will contribute to compact urban growth aligned to higher-level spatial policy.
	(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement	The lands are currently developed.
3	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the local area plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	The extent of Flood Zone A/B across much of this zoning is largely along the route of the Groody River and risks can be managed by limiting development to minor developments in areas at risk of flooding as per Section 5.28 of the Planning and Flood Risk guidelines and Circular PL2/2014.
4	Conclusion of the Justification Test	
Given the measures above, the objectives of the Draft LAP, the Planning Authority is satisfied that the proposed zoning of these lands as existing residential for development is appropriate subject to the provisions of Section 5.28 of the Planning and Flood Risk Guidance and Circular PL2/2014, limiting the extent of development on these lands.		

(c) Lands zoned Agriculture, which is at flood risk within the Plan boundary

1	<p>The urban settlements is identified for growth under the National Planning Framework, Regional Economic and Spatial Strategy, statutory plans prepared under the Planning and Development Act 2000 as amended, relevant Directives and the Planning Guidelines.</p>	
	<p>Caherconlish is a Level 3 Settlement in the settlement hierarchy, identified in the Limerick Development Plan 2022 – 2028. The Limerick Development Plan promotes Level 3 settlements, as development centres for population growth sustaining a wide range of functions, services and employment opportunities supporting its hinterland. In line with National Policy Objective 3c, 30% of all new homes targeted within Level 3 settlements shall be within the existing built-up area of the village. For the main part lands zoned, which is at risk of flooding, is zoned for non-vulnerable uses, such as Agricultural and Open Space and Recreation.</p>	
		
2	<p>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</p>	
	<p>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</p>	<p>The lands are proposed to be zoned Agriculture and development will be limited in terms of the uses permitted to water compatible uses.</p>

(ii) Comprises significant previously developed and/or under-utilised lands	Having regard to the location of the lands, only development appropriate to its location would be considered, subject to an appropriate level of assessment.
(iii) Is within or adjoining the core of an established or designated urban settlement	The lands are located within the Plan boundary.
(iv) Will be essential in achieving compact or sustainable urban growth	Only limited development will be considered, subject to an appropriate level of assessment.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement	Suitable alternative lands are available for vulnerable development elsewhere in areas outside of any flood risk. Agricultural use is considered a less vulnerable use in the Flood Guidelines.
3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the local area plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	These lands zoned agricultural are at flood risk is nearly entirely within Flood Zone A and B, as identified above. Agricultural use is consider a low vulnerability use, however only water compatible uses will be considered on this land use zoning.
4 Conclusion of the Justification Test	
Part 2 of the Justification Test has not been passed and the site is at risk of flooding, lands will on be considered for water compatible uses in accordance with the Flood Guidelines.	

Chief Executive's Recommendations:

In accordance with Section 20(3) of the Planning and Development Act 2000 (as amended), it is recommended that proposed Local Area Plan is made in accordance with the Draft Plan published on the 15th October 2022 and the proposed amendments outlined in the Chief Executives Report above. It is considered that the changes listed above will not have any significant impact from a Strategic Environmental Assessment or Appropriate Assessment perspective.

A handwritten signature in black ink, appearing to read 'Vincent Murray', is written over a horizontal line. The signature is stylized with a long, sweeping tail that extends to the right.

Vincent Murray

A/Director of Services - Economic Development and Enterprise Directorate