

CROOM LOCAL AREA PLAN 2009 – 2015

Chief Executive's report submitted to Elected Members in accordance with Section 19(1)(d) and 19(1)(e) of the Planning and Development Act 2000 (as amended) in relation to the deferral of making a new Local Area Plan

4th November 2014

Forward Planning Section



Part 1 Introduction

1.1 Background

The Croom Local Area Plan (LAP) 2009 – 2015 is the main public statement of planning policies and objectives for the town of Croom. The Plan was adopted by Limerick County Council on the 21st December 2009 and is due to expire in December 2015.

Section 19 (1)(c) of the Planning and Development Act 2000 (as amended) requires that the process of reviewing an existing LAP should commence not later than 6 years after the adoption of the previous plan. However, the Planning and Development Amendment Act 2010 introduced a new provision whereby a Planning Authority may, as they consider appropriate, by resolution extend the life of an existing local area plan for a further period not exceeding 5 years.

1.2 Statutory Procedure

The Planning Authority may, as they consider appropriate, by resolution, **defer** the sending of notices to commence the review of a local area plan. No resolution shall be passed until such time as the members of the Planning Authority notify the Chief Executive of the decision of the Authority to defer the sending or publishing of the notices, giving reasons, and having sought and obtained from the Chief Executive :

- An opinion that the LAP remains consistent with the objectives and the core strategy of the relevant Development Plan,
- An opinion that the objectives of the LAP have not been substantially secured, and confirmation that the sending and publishing of the notices be deferred and the period for which they may be deferred.

If the elected members accept the Chief Executive's recommendation that the current Croom LAP is consistent with the objectives of the Limerick County Development Plan 2010 – 2016 as varied and its core strategy, and are in agreement that during the lifetime of the LAP that the objectives of the plan have not been substantially secured, they may determine by resolution that it would be appropriate to defer the process for making a new plan, for an agreed time period.

Following the making of any such decision, a public notice to this effect is required to be published in a newspaper circulating in the area of the local area plan not later than 2 weeks after the resolution is passed by members.

1.3 Purpose of this report

The purpose of this report is to set out the opinion of the Chief Executive that:

- a) The Croom Local Area Plan 2009 – 2015 remains consistent with the objectives and the core strategy of the Limerick County Development Plan 2010 – 2016 as varied; and
- b) The objectives of the LAP have not been substantially secured to date;

- c) The sending and publishing of notices may be deferred and the period for which they may be deferred.

Part 2 Compliance with the Core Strategy of Limerick County Development Plan 2010 – 2016

2.1 Introduction

In accordance with the Planning and Development Acts (as amended), a Core Strategy is required to demonstrate how the Development Plan is consistent with the National Spatial Strategy, Regional Planning Guidelines, Government Policies and Ministerial guidelines / directives. Local Area Plans, in turn, must be consistent with the County Development Plan. The Local Area Plan was adopted prior to the adoption of the current County Development Plan 2010 and the Core Strategy which was adopted as a variation to the County Development Plan in December 2011. The population targets identified in the Core Strategy supersedes those that are made in the Local Area plan.

The core strategy of the Limerick County Development Plan 2010-2016 outlines population targets and housing land requirements for County Limerick, which were allocated by the DoECLG at national level and distributed at regional level by the Mid West Regional Authority. The Mid West Regional Planning Guidelines (RPGs) 2010-2022 have allocated a population target of an additional 32,800 people for County Limerick up to the year 2022. Based on this population target the core strategy has allocated a specific population target for each settlement.

The population target for Croom in the Core Strategy was for 730 persons by 2022, (730 persons in addition to the 1,045 persons recorded in the 2006 Census). This equates to a requirement for an additional 392 housing units or 33.14 hectares, based on the population targets from 2006 to 2022.

2.2 Settlement Strategy

The County Development Plan identifies Croom as one of the Tier 3 settlements.

2.3 Population, housing growth and zoned land requirements

During the 2006 – 2011 period the census records a population increase of + 13.3%. Since 2002 there has been consistent population growth in the town.

In accordance with the 2010 County Development Plan 392 housing units are required in Croom to meet the population growth between 2006 and 2022. The 2011 census indicated that 48 new housing units were built in the town between 2006 and 2011.

Therefore, the additional number of housing units required to 2022 according to the Core Strategy is 392 minus 48 (units built from 2006-2011) = 344. This equates to 29 hectares of land required to meet the population target to 2022.

Units required to 2019:

The extended plan would have a lifespan up to 2019. To calculate the housing unit requirement for 2019 the core strategy 2022 figure is used, minus the number of units built between 2006 and 2011 and then calculated on an annual pro rata basis, as follows:

$344/11$ (years from 2011 – 2022) \times 8 (years from 2011-2019) = 250 units required by 2019.

Hectares required to 2019:

20% serviced sites = 50 units / 10 (units per hectare) + 50% (headroom to allow for an element of choice) = 7.5 hectares

80% residential = 200 units / 22 (units per hectare) + 50% (headroom to allow for an element of choice) = 13.64 hectares

Total hectares required by 2019 = 21.14 hectares

2.4 Capacity of existing zoned land

There are currently 25 hectares of land available for residential development, which represents a surplus of 4 hectares over that required until 2019. The projected land requirement for 2019 includes 50% headroom. The Mid-West Regional Planning Guidelines state that more land should be zoned for residential development than is required to meet the population targets (MWRPG page 72). In this regard the excess should normally lie between 50% and 150% of the land required.

The amount of land required to meet the population target for 2022 is 29 hectares. Therefore it is considered that the zoning provisions in the current LAP are adequate.

2.5 Flooding

The Council is committed to managing flood risk in accordance with the principles set out in ministerial guidelines "The Planning system and Flood Risk Management, Nov 2009". In this regard the county-wide flood risk assessment by JBA consultants, undertaken in 2011, was consulted to assess the existing zoned land in terms of potential risk of flooding. These will eventually be replaced by the catchment based flood risk assessment currently being undertaken under the aegis of the OPW (CFRAMS).

The JBA maps indicate that in total 9.3 hectares of lands that are zoned within the Local Plan area for residential, are subject to a flooding with a greater than 1 in 100 chance of flooding in any given year, i.e. north of the Croom Hospital/Crecora road in

the northern perimeter of the town, and just south of the Croom hospital itself. All but 0.6 hectares of these lands are zoned for serviced sites. 3.4 hectares of these lands were included as part of an 'Area Subject to Flood Impact Assessment' in the Local Area Plan, to be 'subject to flood risk assessment and appropriate mitigation measures'.

The area potentially at risk of flooding, according to the JBA maps, is greater than that indicated in the LAP. However, as the proposed CFRAM maps, will supersede the JBA flood maps it is recommended that the plan is amended if necessary, when the CFRAM maps are available.

2.6 Infrastructure

Waste Water Treatment

The Wastewater treatment plant was built in 1987, it has capacity for 2,000 Persons Equivalent; the demand was estimated as being 1,850 PE in 2009, the year of the Council's successful application for a discharge licence, but projected to increase to 2,600 PE by 2016. By 2013 the load has decreased to 860 PE¹, not increased, this is a reflection of the slow down in development and economic activity.

Water Supply

At the time of the adoption of the Local Area Plan the public water supply for the town was at capacity. Plans were afoot to connect Croom with the city's water supply through an extended mains, as part of the Adare and Patrickswell scheme. These plans are currently at planning stage.

Transport

The County Development Plan seeks to implement the provisions of the Mid West Area Strategic Plan (MWASP) 2012-2030. This plan informs transport, planning policy and infrastructure investment decisions in the region to 2030.

The policies of the current local area plan sufficiently support this role as envisaged. The most significant change in context since the adoption of the Local Area Plan is that the National Road Authority have decided not to proceed with plans for the M20, a scheme which would have incorporated the by-pass to the west of Croom.

With respect to Croom itself, there is an objective in the Local Area Plan to facilitate a distributor road, in association with development, to the east of the town centre, which would provide for expansion of the town while reducing traffic congestion in the main street. Two locations were also identified as suitable for off street parking provision in the town centre. The provision of one of the two car parks close to the town centre at the southern end of St. Marys park has been provided.

In other respects, policies and objectives relating to transport have not been substantially secured as they relied on private development. The policies and objectives remain consistent with the County Development Plan.

¹ Annual Environmental Report (AER) from Limerick City and County Council to EPA, on Croom Agglomeration, Waste Water Discharge Licence (WDDL) D-0307-01

2.7 Retail Strategy

A retail strategy was prepared in 2010 on behalf of Counties Limerick and Clare and Limerick City Council and was adopted into the County Development Plan on 1st November, 2010. Its primary purpose is to support the statutory plan making process to ensure that adequate provision is made for new retail development in the most appropriate locations. The strategy provides guidance on the need for new retail floor space and where it should be located, in accordance with the principles of sustainable planning.

In the 2009 LAP the core retail centre is designated on Main Street and High Street and Policy LE2: Retail Development, complies with regional retail planning policy² and the County Development Plan, in that it requires retail development to comply with the County Retail Strategy and Retail Planning Guidelines. This policy also places restrictions on retail provision in 'out of centre' locations.

The LAP states (p23)

"Croom functions as a small but important local centre for the town and its hinterland. The main aim of the Council is to encourage the economic and environmental regeneration of the town by focussing retail/commercial development within the town centre... zoned areas and restricting retail developments in out of centre locations."

While policies and objectives relating to retail development have not been substantially secured the zoning objectives remain consistent with the Core Strategy and other provisions of the County Development Plan.

2.8 Economic Development

The largest employer in the town is the Orthopaedic Hospital. Industrial and enterprise development in the town is small in scale. Croom Community Development Association developed a 753sq.m. enterprise centre in Towerfield, south of the hospital road, and in an area zoned mixed use behind the main street.

Other than this, the only existing manufacturing facility is Croom Precision Tooling Ltd to the south-west of the town centre.

7.3 hectares was zoned for industrial development to the north of the town centre in the 2009 Local Area Plan. No proposals for development have come forward on this site since the adoption of the Local Area Plan and there are no outstanding planning permissions.

While policies and objectives relating to economic development have not been substantially secured the zoning objectives for mixed use and for industrial development remain consistent with the Core Strategy and other provisions of the County Development Plan.

² Kilmallock Local Area Plan, page 61

2.9 Community and Recreation

The LAP contains a number of policies in relation to community and recreation facilities, reflecting the particular uses and needs in the area.

Croom has a hospital of regional importance, and also a large post-primary school, the catchment of which extends well beyond the town itself. Croom national school had 147 pupils enrolled in the 2013-2014 year. Coláiste Chiaráin, the secondary school had 871 pupils in the 2013-2014 academic year.

The secondary school has grown organically on a site close to the town centre from its original building through a series of pre-fab extensions. The existing accommodation is not up to par with the requirements of a large modern post-primary school. A recent planning application for a new campus in unzoned lands to the north of the town was unsuccessful following an overturning of a Council decision by An Bord Pleanála, (reference 13/680 see under 'Part 3, Planning applications', below). The issue for this report is whether there is adequate provision in the Local Area Plan for expansion or relocation of the campus to meet the reasonable requirements of the secondary school for a permanent building for up to 1,000 students and a workable campus consistent with Department of Education guidelines.

Provision has been made in the Local Area Plan for 5.18 hectares for Education/Community to allow for its expansion in situ, the building and ancillary areas currently occupy only 2.18 hectares of this site. The size of site recommended by the Department of Education for a two storey post-primary school accommodating 1,000 pupils is 4.57 hectares³. In principle there is adequate scope to provide for redevelopment and expansion in situ. The indicative line for the distributor road, which divides the site, should not represent 'a significant impediment to the campus layout'⁴, according to the Inspector's report in the appeal case. There is also scope to expand the school into neighbouring zoned lands, which are undeveloped, have no outstanding planning permissions and are zoned open space amenity to the east and Residential to the north and east. In the open space amenity zoning, education and community uses are 'open for consideration' according to the land use matrix; and in the residential zoning, education and community uses are 'generally permitted'.

In respect of other community uses, construction has commenced on the Civic Centre and associated car park at the southern end of St.Marys park (also known as the Wells Meadow) and of the upgrade of St.Marys park itself.

In relation to recreation, there is an objective in the LAP to facilitate the implementation of a children's playground within the park, in a location close to the proposed Civic centre. Plans are underway to provide this facility.

³ Identification and Suitability Assessment for Post-Primary School Sites, Technical Guidance Document TGD-O27, 1st ed. 2012, Department of Education and Science, Table 1 p9.

⁴ Croom Secondary School Inspectors Report ABP, Ref 13.243386, 2014, p21

Five separate areas are zoned for amenity open space, three of which are by the riverside. Progress has been made on the development of only one of these areas, i.e. St. Mary's Park.

Of the two areas zoned amenity not by the river, one is fully occupied by a soccer club, the other remains undeveloped.

Other objectives included a proposal to extend a walkway and amenity areas along the river Maigue to the north and south of the main bridge into the town centre, and to construct a pedestrian bridge crossing the Maigue to link the two amenity areas to the north of the town centre, that is St. Mary's park on the east bank with another amenity area on the west bank. No progress has been made to date on these objectives.

Having assessed the policies and objectives on community and recreation, it is evident that the objectives are broadly unsecured, but remain consistent with the Core Strategy and other provisions of the County Development Plan.

2.10 Built and Natural Environment

The town centre of Croom is designated as a Historic Town and is entered into the Record of Monuments and Places (LI030-025). As a Recorded Monument it is protected under the National Monuments Acts 1930-2004. In addition the area in the vicinity of Croom Castle is designated a 'Special Control Area'. Collectively the streetscapes of the town contribute to our understanding of Irish towns and are consequently protected in an 'Architectural Conservation Area'. The town has many individual structures of such importance that they are deemed to be 'protected structures'.

The town has a distinctive and pleasant natural setting by the river Maigue. Recreation objectives are to open up areas along the Maigue for public amenity (noted above); and to protect the many mature trees in the Local Plan area.

There is an issue with vacancies of commercial properties in the town centre: 10 of the 24 retail units on the Main street are vacant, and the AIB branch closed recently on High Street.

The Croom 2009 LAP was subject to Strategic Environmental Assessment (SEA) screening but was not deemed to require a SEA as it was sub-threshold. In the case of Appropriate Assessment (AA), screening was also carried out and the AA was deemed not necessary due to the absence of Natura 2000 sites within the plan boundaries and the distance of the plan area from such sites.

Part 3 General overview of planning applications for development in the town since the adoption of the LAP

Due to the economic downturn there has been very little development from the private sector in the town since the adoption of the LAP. The following is a brief summary of significant permissions granted in the area under the various land uses of the LAP since 2009.

Residential

There has only been one permission for a multiple housing scheme since the adoption of the Croom Local Area Plan, which was for 11 serviced sites.

An extension of planning permission was granted, but has since expired, to complete 45 units from a housing scheme of 89 dwelling units, (84 houses and 5 apartments) to Garben properties in a site in the south west of Croom, and west of the Maigue (10/7022 extending 01/371). This housing scheme, named Cois Srutháin, remains incomplete, with 40 no of houses not yet commenced. All other houses within this estate, with the exception of 4, are occupied. The scheme is listed as an Unfinished Housing estate requiring remedial action to complete works.

Retail

Since the adoption of the LAP no applications have been made for retail development.

Education and community

As noted above, permission was refused on third party appeal, ref 13.243386, to Coláiste Chiaráin for the development of a new secondary school building on an 8.8 hectare site to the north of the town. The reasons for its decision concerned flood risk; that the development would materially contravene Objective SSO5 in the County Development Plan which seeks to prevent urban sprawl, and Objective COM11 which seeks to ensure that educational facilities are located where possible, in close proximity to community services and accessible by various modes of transport.

Permission was granted by an Bord Pleanála, upholding a Council decision, in respect of a Civic centre and upgrading of St. Marys park along the east banks of the Maigue(Planning ref 10/197, An Bord Pleanála ref 13.238691). This is a Croom Community Development Association scheme and work has currently commenced on amended plans for the civic centre itself and for associated car parking, granted planning permission under reference 13/279.

Industrial/Enterprise

Permission was granted for a Community Enterprise centre to Croom Community Development Association. Construction commenced and the building was officially opened in May 2013. It is 753 square metres in floorspace and has 17 office spaces, three meeting rooms and one large training room.

Part 4 Conclusion and recommendation

There are a considerable number of policies and objectives in the Croom Local Area Plan that have not been secured due to the deterioration of public finances and the onset of the economic recession.

In summary, it is the opinion of the Manager that:

- The Croom Local Area Plan 2009-2015 is consistent with the objectives and core strategy of the Limerick County Development Plan 2010-2016.
- The objectives of the Croom Local Area Plan have not been substantially secured.
- The sending and publishing of notices to review the existing LAP may be deferred for a period not exceeding 5 years. Therefore the lifespan of the Croom LAP 2009-2015 should be extended for a further five years.

Accordingly, It is recommended that the following resolution be approved by the Council:

'Having considered the Chief Executive's report, the Planning Authority resolves to extend the life of the Croom Local Area Plan 2009, by a further 5 years, from today's date, in accordance with the provisions of Section 12 of the Planning and Development (Amendment) Act 2010, (which amends section 19 of the Principal Act) and provides for the extension of the valid life of a Local Area Plan.'



Pat Daly,
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