

SOUTHERN ENVIRONS LOCAL AREA PLAN 2011 – 2017, as amended.

**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**

5th May 2016

Forward / Strategic Planning Section



Part 1 Introduction

1.1 Background

The Southern Environs Local Area Plan (LAP) 2011 – 2017 is the main public statement of planning policies and objectives for the Southern Environs area of Limerick city suburbs, formerly in the county council. The Plan was adopted by Limerick County Council on the 23rd May 2011 and is due to expire in 22nd May 2017. It has been amended twice, firstly in respect of neighbourhood centres, on 2nd September 2014; and secondly, on 18th April, 2016 in relation to amended zoning and a master plan for the Mungret Loughmore area and to take into account 2011 Census.

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 Southern Environs 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 Southern Environs Local Area Plan 2011 – 2017, as amended, 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 to make or review the plan 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 2000 (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 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 Southern Environs in the Core Strategy was for an additional 5,400 persons by 2022. This equates to a requirement for 2,898 additional housing units or 124.2 hectares, based on the population targets from 2006 to 2022.

2.2 Settlement Strategy

The Southern Environs is part of the Limerick / Shannon Gateway which is designated as such under the National Spatial Strategy. The Mid-West Regional Planning Guidelines designate this gateway 'Zone 1' in the region. The Southern Environs' role is to strengthen the development of the Shannon/Limerick Gateway, while not undermining the primacy of the city centre in the commercial and retail hierarchy of the region.

2.3 Population, housing growth and zoned land requirements

The table below is an extract from the southern Environs Local Area Plan, which was recently amended, and indicates the additional population, number of units and zoned land required to 2022, to comply with the core strategy.

Table 2.1: Core Strategy as adjusted, Population allocation, housing requirement and land Requirement.

Year	2006 census	2011 census	Expected population 2022 Core Strategy*
Total population	16,000	17,310	21,465
Additional population 2011-2022			4,155
Additional housing units required, Core Strategy 2011-2022			2,387
Zoned land required to accommodate additional housing units			124.00

* 2,898 was the total figure of additional houses estimated as being required to meet the Core Strategy target between 2006 and 2022. 2,387 is the adjusted figure for 2011, subtracted for houses built between 2006 and 2011, which is 511 (Ballycummin and Limerick South Rural DED, the latter divided by half).

2.4 Capacity of existing zoned land

The table below demonstrates that there is sufficient land zoned to meet the core strategy requirements.

Table 2.2 Extent of land zoned in Southern Environs Local Area Plan, as amended

	LAP as amended	Core Strategy Target	Surplus/ Deficit
Mungret Loughmore	82.54	124	-2
Remainder	39.34		
Southern Environs Total	122		

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", and OPW data and advice as stated in the County Development Plan. The Preliminary CFRAM maps, published in 2014 are the most up to date data under the aegis of the OPW, and as such they were consulted to assess the existing zoned land in terms of potential risk of flooding. These maps indicate that the total area zoned for new residential which may be at risk of flooding is very limited, confined mainly to a few pockets of established housing.

Therefore the current zoning is in line with the most up to date flood maps and guidelines.

2.6 Infrastructure

Waste Water Treatment

The Southern Environs is part of the Limerick Metropolitan agglomeration served by the Limerick Mains Drainage Network. The main wastewater treatment plant is off the Dock road, which is within the Local Plan area itself. The mains drainage network was extended in 2012 to include Mungret village, which heretofore was un-serviced by any sewers.

Objective IN1 (Sewerage facilities within Mungret) has been altered by Amendment no.2 to reflect this development.

There is sufficient capacity to accommodate the projected growth.

Water Supply

Water supply to the Southern Environs comes from the Shannon via the Clareville Treatment Plant. Water is pumped to a storage reservoir and water tower at the ridge top of Newcastle within Castletroy, in the eastern environs of the city, to enable all of Limerick urban area to be supplied without the further use of pumping equipment. Capacity is adequate to cater for existing and projected population growth.

Transport

The Southern Environs is strategically located where the N20 comes in from Kerry and Cork, and where the Southern Orbital M20 links the Dublin road with the north-west across the Shannon tunnel. The suburbs are well served by both radial routes linking it to the city centre, and by a number of link roads to complement these routes. There are a number of objectives in the current plan relating to the transport infrastructure. The principal emphasis in the plan was of extending the network to serve new development areas in the Mungret Loughmore areas and south of the Dock road and to improve the capacity of the existing network to accommodate the traffic generated by development in these areas. There has been only very limited progress on achieving these objectives.

Since the adoption of Plan in May 2011 the following works that have been undertaken were to improve the public realm in Mungret village; a combined footpath/cycleway east from Mungret village to Castlemungret cemetery/Mungret St.Pauls GAA; mini-roundabout in Father Russell road; and a cycleway linking Raheen roundabout to Patrickswell along the R526. The amendment to the plan in April 2016 updated the plan to take into account these works.

The following objectives remain to be secured:

1. The link road network (now called 'link roads' in line with Government planning guidelines), serving new residential development areas in Mungret-Loughmore; and industrial development areas south of the Dock road.
2. The development of an on-and-off road cycleway network, along the R510 (between Raheen roundabout and Quinns Cross) and the R859 Mungret road (between Quinns Cross and Castlemungret).
3. The use of the cement factory railway line as a possible quality bus corridor or commuter railway line.
4. The two Park and Ride facilities, one located on the Dock road and the other at Loughmore.

It should be noted that a Part 8 has been granted (15/8006) for road improvement works along the R859 Mungret road between Quinn's cross at Gouldavoher and the entrances to the GAA club and Castlemungret cemetery; this also includes a new junction at Moores lane and a link road south of Moores lane to serve proposed primary schools. The latter road will be the first phase of the link road network that will serve the post-primary school

earmarked for this area and that will ultimately join up this road with Raheen and open up the extensive Mungret Loughmore area for development.

The amended zoning and articulation of a Masterplan for that area of Mungret-Loughmore as part of Amendment no.2 is designed to facilitate the implementation of the link roads in association with development including schools that are needed in the area.

2.7 Retail Strategy

The Southern Environs LAP was prepared having reference to the 2010 'Retail Strategy for the Mid-West Region'.

This strategy was prepared in 2010 on behalf of Counties Limerick and Clare and Limerick City Council. It 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, primarily Limerick City Centre. The strategy provides guidance on the need for new retail floor space and location of floor space, in accordance with the principles of sustainable planning.

The Local Area Plan contains an objective 'not to permit any retail floor space' in out of centre locations. This and all other retail objectives, are framed to be consistent with the Retail Strategy in such a way as to protect the primacy of the city centre, and "due to the Mid-West already being over-shopped, the huge scale of the retail development pipeline and the limited forecast growth in consumer retail expenditure per head through to 2016 [the end date of the Retail Strategy]".

The Crescent Shopping Centre is designated as a Tier 2 level 1 Shopping Centre in the Retail Strategy. The Local Area Plan contains an objective in relation to the Shopping Centre, consistent with the Retail Strategy, to allow only "limited expansion of retail floor space within the Crescent shopping centre where it does not alter its role and function with respect to Limerick City Centre and the Retail Hierarchy".

Neighbourhood and village centres are identified and defined on the Land Use Zoning maps, with an upper limit set on the shopping floor area of neighbourhood centres and the prohibition of comparison retail in these centres. Amendment no.1 to the Local Area Plan was inserted following a Ministerial Directive on 2nd September 2014, to reinforce and clarify the limit that should be set to convenience floorspace in neighbourhood centres, consistent with the Retail Strategy.

[Objective ED8] 'Within Neighbourhood Centres the entire gross convenience shopping floor area shall not exceed 900sqm in area, (600sqm in area, net).'

2.8 Economic Development

The 2011 LAP zoned extensive areas of land for light industrial and enterprise use, which are shown on the following table (Table 2.3). This table also depicts developments since the adoption of the plan, clearly illustrating the lack of development since 2011:

Table 2.3 Industrial and Enterprise Zoned land

Zoning	Name of Area	Extent of zoned land (ha)	Area of land occupied by Buildings (and curtilages) in 2011 (ha)	% of total zoned lands with buildings on it	Occupancy of units in 2015 *	Development since 2011
Enterprise and Employment	Ballycummin (includes Raheen Business Park (179 ha))	227.00	70.00 (all in Raheen Business Park)	30%	90%	Regeneron (planning permission for future extension) Analog Howmedica/Stryker
	Ballykeeffe-Skeha-creggaun	82.5	12.85	15%	100%	Minor changes
	Rosbrien	11.26	None	0%	-	None
	Westward Ho Mungret village	4.4	None	0%	-	None
	Mungret College Main building	0.64	Main building	100%	0%	None
Industry	Castlemungret-Tervoe	307.5 (271 ha Cement Roadstone)	47.3 (plant and ancillary) 147.0 (quarry)	64%	100%	None
	Ballykeeffe (north of Dock road)	11.75	6.78	58%	100%	None
	Skehacreggaun SW of junction R510/N69	1.03	1.03	100% (Cemex)	100%	None

* source: Geo Directory

In relation to all these lands there has been very little physical development involving extensions into previously undeveloped land, since 2011. In the Raheen area, approximately 243 hectares of land zoned for Enterprise and Employment remains undeveloped, that is 75% of the entire area zoned for this purpose. The very positive development by bio-pharma company Regeneron principally involves change of use of the previous Dell computer manufacturing plant, combined with a new first floor and a 4, 400 sq metre extension.

Accordingly, having regard to the amount of undeveloped industrial zoned land the objectives relating to economic development throughout the plan area have not been substantially secured.

2.9 Community and amenity

In relation to community uses and amenities, there have been a few significant positive commitments that have emerged since the adoption of the Local Area Plan in 2011. All of these developments and commitments are in the Mungret-Loughmore area and required changes to the land use zoning and objectives to facilitate these uses, hence Amendment no.2 to the Local Area Plan, which was adopted in April 2016. Some of these developments include the following:

- An 11 hectare neighbourhood park in front of Mungret College, including playground, is at an early stage of being developed;
- Two permanent buildings for primary schools, that is the Gaeilscoil Raithin and Educate Together are proposed in the area. These have got Council planning permission in 2015 and the commitment of the Department of Education.
- A proposed post primary school in the Mungret Loughmore area, in respect of which the Department of Education is committed in principle.

Amendment no. 2 ensured that the zoning in the area remains consistent with the Core Strategy and other provisions of the County Development Plan.

2.10 Environmental considerations

The Southern Environs 2011 LAP and amendment no. 2, which was adopted in April 2016, was subject to Strategic Environmental Assessment (SEA). The LAP incorporated appropriate land use zoning, polices and objectives to ensure the implementation of the LAP will not result in significant effects on the environment in accordance with the SEA Directive and Regulations and in compliance with the associated objectives of the Limerick County Development Plan 2010-2016. Amendment no.2 incorporated the proposed Natural Heritage Area of Mungret Loughmore.

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

Due to the economic downturn there has been very little development in the area 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 have been no significant permissions granted for residential development since the adoption of the Local Area Plan in May 2011. An extension to Planning permission has been granted for a 145 housing unit development in Skehecreggaun (12/7132 extension to 06/1577) to Genesis Homes, until May 2018, and construction is proceeding on this.

Retail

There have been no significant permissions granted for retail development since the adoption of the Local Area Plan in May 2011.

Education and community

There have been two significant proposed developments of educational or community use since 2011: firstly there has been a proposal for two primary schools, permission for which was granted in 2015 (15/522); secondly Part 8 was granted for an 11 hectare neighbourhood park (14/8003).

Industrial

The most significant proposed industrial/enterprise development for which permission has been granted is Regeneron in the Raheen business park. This involves the change of use of the former computer manufacturing facility of Dell, 40,538 sq metres, to a production facility for this multinational bio-pharma company. An additional storey, 23,679 sq metres in extent, and a 4,400 sq m laboratory were also proposed and approved (planning ref.13/745). The plant aimed to have 300 staff initially with plans for an additional 200. There was extensive additional employment in construction and fit out and also for sub-suppliers.

Infrastructure/ Urban renewal

A Part 8, 13/6001 was granted for improvement of the public realm of Mungret village; this also involves a footpath and cycleway linking the centre along the R859 east as far as Castlemungret cemetery/Mungret St.Pauls GAA; the works have been completed on this. On foot of another Part 8, 15/8006, construction has commenced on the upgrading of the remainder of the R859 as far as Quinns cross, a new junction at Moores Lane, and a new road to serve two planned primary schools immediately to the south. This latter road is to be the first phase in what will ultimately be a through link road connecting the R859 and the Dock road via Moores lane with Raheen. The road will also serve a new post primary school for which a suitable site has been identified in the Mungret-Loughmore area, and an extensive area of lands zoned for residential development in the area.

Part 4 Conclusion and recommendation

Having regard to the lack of development involving new land in the area since 2011 there are a considerable number of policies and objectives that remain relevant and yet have not been secured.

In summary, it is the opinion of the Chief Executive that:

- The Southern Environs Local Area Plan 2011-2017, as amended on September 2014 and April 2016, is consistent with the objectives and core strategy of the Limerick County Development Plan 2010-2016.
- The objectives of the Southern Environs 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 of 5 years. Therefore the lifespan of the Southern Environs LAP 2011-2017 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 Council resolves to extend the life of the Southern Environs Local Area Plan 2011, by a further 5 years, from today's date, in accordance with the provisions of Section 19 of the Planning and Development (Amendment) Act 2010, and provides for the extension of the valid life of a Local Area Plan.'



Pat Daly,
Director Economic Development