

COMHAIRLE CATHRACH AGUS CONTAE LUIMNIGH
LIMERICK CITY & COUNTY COUNCIL

Údarás Pleanála,
(Planning Authority),
7-8 Sráid Phádraig,
(7-8 Patrick Street),
Cathair Luimnigh,
(Limerick City),

20th January 2016

To Each Elected Member of the Metropolitan District of Limerick

**Re: Proposed Amendment to the Southern Environs Local Area Plan 2011-2017,
Mungret Loughmore Area**

A Chomhairleoir, a chara,

I enclose herewith a copy of the Chief Executives Report on Proposed Amendment No. 2 to the Southern Environs Local Area Plan, which relates to an amended zoning and a Master Plan for the Mungret Loughmore Area of Limerick, for your consideration.

The Proposed Amendment was put on formal public display from Saturday 31st October 2015 to Monday 14th December 2015 inclusive. A total of 56 submissions were received during the statutory period. A report consisting of a summary of the submissions received, together with recommendations are attached as required by Section 20 of the Planning and Development Act 2000 (as amended). The submissions can be inspected in the Forward Planning Section during normal office hours and copies of the original submissions will be available for inspection at the Metropolitan District meeting.

The members of the Metropolitan District of Limerick, at their February meeting shall consider the Chief Executive's Report and decide whether to make or amend the Proposed Amendment to the Southern Environs Local Area Plan. If the Council decide to amend the Local Area Plan, any material alteration will be put on public display for a further 4 weeks.

If you have any queries on the report please contact Maria Woods, Senior Executive Planner, on 061-407228.

Mise le meas,



**Pat Daly,
Director of Services,
Economic Development and Planning.**

Proposed Amendment No.2 to Southern
Environs Local Area Plan
2011 – 2017
Mungret Loughmore area

Chief Executives Report to Members
20(3)(c)

20th January 2016



Forward Planning

Limerick City and County Council,
Economic Development and Planning Department,
7/8 Patrick Street,
Limerick.

Proposed Amendment to Southern Environs Local Area Plan 2011-2017:
Section 20(3)(c) Chief Executives Report to Members

1.0 Introduction

This report presents the submissions made following publication of the Proposed Amendment, 2015, to the Southern Environs Local Area Plan (LAP) 2011 – 2017. It sets out the Chief Executive's responses to the issues raised and any alterations to the proposed Amendment. The report is part of the statutory procedure for preparing an amendment to the Local Area Plan (LAP) as set out in Section 20(3)(c) of the Planning and Development Act, 2000 (as amended).

1.1 The Proposed Amendment (no.2)

The Proposed Amendment (no.2) relates to an amended zoning and a Master Plan for the Mungret Loughmore area of Limerick. Census information is updated to include the 2011 Census figures. All references to Limerick County Council are being replaced with Limerick City and County Council.

1.2 Public Display

The Proposed amendment to the Local Area Plan was placed on public display from 31st October 2015 until 14th December 2015. A total of 56 written submissions were received within the statutory timeframe.

1.3 Structure of this Report

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

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

Part C is the Strategic Environmental Assessment Screening and Appropriate Assessment Screening of the amendments recommended to the Local Area Plan.

1.4 Next steps

Following receipt of the Chief Executive's Report, the Members of the Metropolitan District have up to 6 weeks in which to consider the contents of this report and the proposed Amendment. Members may then decide whether or not to amend the Plan. Should alterations be proposed which would constitute material alterations to the Amendment, there is a further public display period (4 weeks) giving members of the public an opportunity to comment on the proposed alterations only. This is followed by the preparation of a second Chief Executive's Report to the Members on any submissions received on the proposed alterations.

Members may then decide to make the amendment to the LAP with or without the proposed alterations or with modifications to the proposed amendments, subject to the provisions of the Planning and Development Act, 2000 as amended. The formal making of an Amendment to the LAP is by resolution by the Members of the Metropolitan District. During the LAP amendment 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.

1.5 Main Issues raised

The following is a synopsis of the main issues raised in the submissions.

Among the public and local landowners, there were mainly 6 points of contention, these are as follows:

- A. The proposed additional link road from Caher road to provide additional access to the new development lands to the north, including the site earmarked for the secondary school. There were 40 submissions in total objecting to this proposal from local residents. In addition there is one submission from HRA planning consultants made on behalf of Mungret Community Council with 184 signatures (these include but are not exclusive to residents of Caher road itself). Some of the residents also stated that a footpath and/or cycleway link would not be acceptable to them either.
- B. Concern over the inclusion of apartment development (one submission).

- C. The proposed rezoning of a 6.4 hectare site from agriculture to residential development, that would extend the residential zoned lands to within 100 metres to the rear of residential properties on Caher road; the current zoning is 300 metres from these properties.
- D. The zoning of Mungret College complex as Mixed Use instead of community use.
- E. The proposed rezoning of an infill site off the Pump road, Rathmale townland, 1.22 hectares in extent, from agricultural zoning to serviced sites to facilitate six detached houses. A letter of objection was received from a neighbouring resident and was accompanied by a petition with 23 residents of Rathmale townland.
- F. The proposed zoning of the Loughmore Common turlough pNHA and an additional 50 metres buffer zone around it, as 'semi-natural open space'.

There were four submissions from statutory consultees: the EPA and the Environmental Assessment Officer of Clare County Council made some observations on how the proposed Amendment could be improved to protect the natural environment. The Department of Environment request that the Amendment be altered to reflect the up to date planning guidance in respect of roads and in respect of apartments, clearly demonstrating compliance with the Design Manual for Urban Roads and Streets (DMURS) and the 'Sustainable Urban Housing: Design Standards for New Apartments' (DECLG, December 2015). Transport Infrastructure Ireland (TII) request that the Local Area Plan be altered to reflect developments since the LAP was adopted in 2011, including TEN-T Core road proposals, and the DECLG policy on national roads (2012). More specifically they request that the Council should either omit the park and ride proposals or justify them on a strategic basis, quantify the impact of zoning that would affect the capacity of junctions on the national road network, and introduce adequate set-backs in zoning to allow for future improvements.

2.0 Persons / Bodies who made submissions within the statutory timeframe

Sub. No.	Submission Received From
1	Eoin Bennis, DECLG
2	Michael McCormack, Transport Infrastructure Ireland
3	Sheila Downes, Environmental Assessment Officer, Clare County Council
4	Cian O'Mahoney, EPA
5	Michael and Grainne McMahon, Caher Road
6	Derek Richardson, Rathmale, Pump Road, Mungret (petition signed by 23 residents included)
7	William Mulcahy, Baunacloka
8	Shannon Commercial Property (Jim Hughes, Fehily Timoney and Company)
9	Geraldine McInerney (address unspecified)
10	Jerry and Jean Dennehy, The Chestnut Caher Road.
11	Finola and Finbar Sharkey, Caher Rd.
12	Paddy and Elizabeth Richardson, Ashdale, Caher Road.
13	Mr. and Mrs Denis and Helen O'Connor Doiney Caher Rd.
14	Mr and Mrs David and Catherine Geary, Ashdale Caher Road
15	John Joe Hallinan, Caher road
16	Mr Shane Barrett Dún an Óir Caher Rd
17	Ms Anne Barrett, Caher Road
18	Mr Terence Barrett, Caher Road
19	Mr Dean Barrett, Caher Road
20	Ms. Grace Barrett, Caher Road
21	Mr Sean Hanley, Caher Road
22	John and Kathleen Browne, 'Bruncuinn', Caher Road.
23	Padraic O'Reilly, Mungret Woods
24	Anna O'Neill, Ballynoe, Caher Road
25	Neilus O'Neill, Caher Road
26	Mr. Robert Fitzgerald, Caher Road.
27	Ms. Emma Fitzgerald, Caher Road
28	Ms. Aoife McNamara, Caher Road
29	Ms. Finola Sharkey, Caher Rd
30	Mr. Tony McNamara, Caher Road
31	Bronagh O'Neill, Ballynoe, Caher road.
32	Ms. Niamh McNamara, Caher Road.
33	Ms. Deirdre McNamara, Caher Road
34	Ms. Jean Dennehy, The Chestnut, Caher Road
35	Mr Terence Barrett, Dún an Óir, Caher Road.
36	Mr. Dean Barrett
37	Mr. Shane Barrett
38	Ms. Anne Barrett
39	Ms. Helen McKeogh, Ballynoe, Caher Road,

40	Sean Rushe Ballynoe, Caher Roa
41	Mr.Tony Byrnes, Caher Road
42	John and Marian Howard, Caher Rd.
43	Brendan Fitzgerald,Caher Road
44	Jim Dennehy, Caher Rd
45	Norman Long
46	Albert and Carol O'Grady Caher Road.
47	Breda Fitzgerald, Caher Road
48	Barry Fitzgerald, Caher Road
49	Marguerite Doyle, 32 nd St.Pauls Scout Group, Garranroe, Patrickswell
50	Mungret Community Council (HRA Planning) plus petition signed by 184 residents
51	Nessan O'Donoghue, Mungret Heritage Society
52	Mungret Wood Residents
53	Gerard O'Rourke:In receivership (Bilfinger GVA)
54	Majella Lowe, Caher Rd.
55	Brian Duhig, Ballynoe
56	Pat Ryan on behalf of Mike Fenton and Bill Mulcahy

LEGEND



Statutory consultees



Caher Road residents/ objection to proposed link/residential zoning 100 m to north of Caher road



Objections to rezoning for serviced sites Rathmale



Objections to buffer zone and or comments on Loughmore Common pNHA



Observations regarding Mungret College complex



Multiple comments, on proposed link to Caher road, residential zoning 100 m to north of Mungret road, and in respect of zoning Mungret college complex



Observations in respect of Archaeological and Architectural Heritage



Request for residential zoning of site on Rosbrien road

Proposed Amendment to Southern Environs Local Area Plan 2011-2017:
Section 20(3)(c) Chief Executives Report to Members

Part A

Summary of submissions and responses.

Chief Executives Recommendation and SEA/AA comments

1	Name/Group:	Eoin Bennis, Dept.of Environment, Community and Local Government,
	Submission:	Response
	<p>The Department is of the view that the proposed Amendment is generally consistent with national, regional and local policy. However they recommend, that the planning authority should have regard to any issues raised separately by the EPA, the Southern and Eastern Regional Assembly, and the National Parks and Wildlife Service. In addition and more specifically, in finalizing the preparation of the amendment, it is recommended that the Council consider the following two changes:</p> <p>1) Design standards for apartments Objective MLO4 'Density and Housing Type Mix' should be altered in respect of 'Standards for Apartments' (section no.5) to include a requirement that all apartment developments are consistent with the new Section 28 Guidelines 'Sustainable Urban Housing: Design Standards for New Apartments' (DECLG, December 2015). These guidelines, which were issued subsequent to the drafting of the proposed amendment, replace previous guidance of 2007.</p> <p>2) Design Manual for Urban Roads and Streets (DMURS). The Council should amend the masterplan and zoning map to reflect DMURS and in particular the reference to 'Distributor road' should be replaced with Arterial/Link street.</p> <p>3) A requirement to comply with the</p>	<p>1) It is recommended that Objective MLO4 is altered as recommended.</p> <p>2) It is recommended that all references to distributor road are replaced with 'link road'.</p> <p>3) Reference is already made to</p>

	design requirements set out in DMURS should also be reinforced in Chapter 10 Urban Design.	DMURS in section 10.1.
	Chief Executives Recommendations	
	<p>1. In relation to Apartments: Change Objective MLO4 (Urban design chapter) Density and Housing Type Mix (point 5) 'Standards for Apartments' in relation to apartment sizes.</p> <p>2. In relation to roads: Replace all reference to distributor roads with 'link road' in text ie objective T4 in Transport Chapter and ML07 in Urban Design Chapter and also in Maps.</p>	
	SEA/AA comments	
	The inclusion of references to up to date guidance is welcomed as it is important that plans are consistent with higher tier plans and guidance- the environmental report has a section which deals with relationships between the plan in question and other plans and policies. The inclusion of additional guidance and clarifications is to be welcomed as part of the plan making and SEA process, as it ensures that the amendments are consistent with best practice and current guidance. No change to the Environmental Report or AA screening document is required.	

2	Name/Group:	Michael McCormick, Transport Infrastructure Ireland (TII)
	Submission:	Response
	<p>The Authority, Transport Infrastructure Ireland (TII) have no issues to raise in relation to the specifics of the proposed Amendment, but requests that the following issues where they involve relevant sites in the Local Plan area, should be appropriately addressed through amended policies and objectives.</p> <p>1. Additional lands zoned adjacent to the N7 and the N69 were advanced in the 2011 LAP in the absence of any quantified impact on the</p>	<p>In relation to points 1, 2, and 5 these issues were already addressed in the Managers Report during the preparation of Local Area Plan in 2011. The following modification had already been inserted to address similar concerns by NRA (the predecessor of the TII), in the 2011 Southern Environs LAP:</p> <p><i>Objective HO3 Residential development within the zone of influence of national roads</i> <i>"Planning applications in the area concerned shall identify and implement noise mitigation measures within the zone of influence of the national road where the proximity of the proposed development to the national road would result in the breach of the National Roads Authority's design goal for sensitive receptors</i></p>

	<p>operation of the national road network in the area. This concern was raised by the National Roads Authority during the preparation of the LAP and remains a concern of the TII.</p> <p>2. The TII recommend that the extension of zoning designations as far as the line boundary of existing national roads and associated junctions should be reviewed to provide for any future enhancements to the network that may be required.</p> <p>3. TII recommend that explicit recognition is given to the Trans European Transport Networks (TEN-T) Regulations (and more specifically the proposed N/M7 to Foynes) and the Spatial Planning and National Roads Guidelines (DoECLG, 2012), both of which issued after the adoption of the Local Area Plan.</p> <p>4. TII call for an evidence based approach in plan preparation in accordance with the Spatial Planning and National Roads</p>	<p><i>exposed to road traffic noise. The costs of implementing mitigation measures shall be borne by the developer”.</i></p> <p>The appropriate building lines are defined according to road classification in Chapter 10 of the County Development Plan (Table 10.9, p10-50)</p> <p>In relation to point 3 the County Development Plan already contains in Policy IN P9 (with relevant section highlighted here in bold)</p> <p><i>It is Council policy to safeguard the capacity of the national road network and road safety standards in accordance with the NRAs (National Road Authority) Policy Statement on Development Management and Access to National Roads (May 2006), and subsequent amendments to or replacements of this, including the forthcoming Government guidance on spatial planning and national roads when adopted...</i>’.</p> <p>However notwithstanding the above it is considered judicious to refer specifically to TEN-T Regulations and the DoECLG Spatial Planning and National Roads Guidelines (DoECLG, 2012) in the introduction to the Transport Chapter as coming within the terms of reference of Policy INP9.</p> <p>In relation to point 4 it is considered that there are sufficient safeguards in the existing policy framework to ensure capacity of the national road network is not compromised by</p>
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	<p>Guidelines (2012), where the local area plan proposes development on zoned lands adjacent to national roads which could affect the operation and capacity of such roads.</p> <p>5. TII recommend that in relation to the indicative Park and Ride locations, they should not be brought forward in the absence of a strategic policy that would justify their location in a co-ordinated manner.</p>	<p>development. It should also be noted that the proposed Amendment does nothing to alter this. There are no zoning changes proposed adjoining the national road network</p> <p>See above</p>
	Chief Executives Recommendation	
	<p>Introduce the following text in Section 5.1 Chapter 5, pp32 of LAP.</p> <p><i>“Improvements to the national road network have released more capacity in the remaining road network, and this contributes to reducing traffic congestion, and creating more space and facilities for transport modes other than the car”.</i></p> <p><u><i>“The Council is committed to the protection of the capacity of the national road network. To this end, the Council shall have regard to all relevant Government guidance including DoECLG ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012) in the carrying out of its functions. In addition care shall be taken in the carrying out of its statutory functions, to ensure development does not prejudice the future development or impair the capacity of the planned core network under TEN-T Regulations which includes the Foynes to Limerick Road improvement scheme. “</i></u></p>	
	SEA/AA comments	
	NO SEA/AA effects from above.	

3	Name/Group:	Ms.Sheila Downes, Environmental Assessment Officer, Clare County Council
	Submission:	Response
	<p>The following observations are made in relation to the screening for Appropriate Assessment:</p> <ol style="list-style-type: none"> 1. The screening does not carry out an assessment of the likely effects of the proposed Amendment on other European designated sites within 20 km of the site. 2. No detailed Conservation Objectives have been provided for the European sites which have been assessed as part of the screening for AA. 3. Notes that a turn off time of 10.00pm for park lights is suggested as part of the AA, to facilitate bats (see observation B2 in relation to the SEA). <p>The following observations are made in relation to the SEA:</p> <ol style="list-style-type: none"> 4. It is suggested that an additional objective be included in Objective MLO15(a) to allow for any bat surveys to precede any future development of Mungret College complex and for appropriate mitigation measures to be incorporated. 5. Suggests that the proposed turn-off time be brought forward depending on season as many bat species emerge half an hour before sunset which from September onwards is 19.30. Consideration should also be given 	<p>1 and 2: The screening and the SEA combined indicate that the localised nature of the amendments will not have effects outside the area of the plan amendment, taking into account the conservation interests of the SAC and SPA. The opportunity is also taken in the amendment to recognize the status of Loughmore Common as a pNHA.</p> <p>3: Detailed discussions have taken place with roads engineers in relation to lighting issues in Mungret, both in relation to lighting time and lighting type.</p> <p>4: Bat surveys took place over the survey period in 2015, between May and July. Mungret college itself has been checked for the presence of bats on two further occasions in April 2014 and October 2015. Pipistrelle droppings were found in an Annex building in 2014. No traces were found in 2015. Further surveys will be carried out as a matter of course prior to any works as this is standard for all council works including works on bridges and other structures.</p> <p>5: As outlined above discussions have taken place with council engineers. They have indicated that there will be a move towards LED lighting which literature suggest has an increased disturbance effects over older forms of lighting. However in relation to bat conservation,</p>

	<p>to additional measures including but not exclusive to directional lighting and low pressure sodium lighting.</p> <p><i>"Bats and Lighting- Overview of current evidence and mitigation"</i> [Emma Stone, 2013 for Bat Conservation Trust, UK] is recommended as a reliable source of information and guidance in this area.</p>	<p>the question of turn off times for lighting in the proposed park and college complex is being further examined. Literature and bat experts have suggested a number of options in relation to turn off times. The installation of bat friendly lighting has been considered in relation to the park, which will be complemented by appropriate landscaping, part of which will involve the retention and enhancement of the existing mature tree stock. It is considered that a number of options exist to protect bats- the nearby schools site in their planning application have been considered to take bats into account in their landscaping and lighting. The Loughmore Common area to the south will be retained as a dark area which will be of benefit to bats.</p>
	Chief Executives Recommendations	
	No changes	
	SEA/AA comments	
	<p>As the response above indicates the issues in relation to ecology and bats have had a considerable amount of back ground work done which was not obvious to outside observers. While the inclusion of bats and ecological buffer zones may be considered to be very specific issues to raise in the context of SEA (they do not form part of the conservation interests of the Natura sites covered by AA), the Environmental Report provides a useful medium for dealing with issues that fall outside the parameters of AA. Having been raised in the ER these issues will continue to be dealt with through discussions and surveys- this does not require any alterations to either the ER or AA screening.</p>	

4	Name/Group:	Environmental Protection Agency (EPA)
	Submission:	Response
	<ol style="list-style-type: none"> 1. EPA acknowledge that the Amendments provide for the protection of the Loughmore Common pNHA. 2. Where the proposed Masterplan involves zoning or development, the requirements of the Habitats, Flood, Water Framework and SEA Directives should be integrated. 3. In relation to the proposed amendment to Objective IN1, 'Sewerage Facilities' EPA suggest that it be further amended as follows: <i>"Ensure that wastewater infrastructure is adequate and appropriate and will keep pace with development that takes place in the plan area, in collaboration with Irish Water, to avoid any deterioration in the receiving waters into which any discharges from such plants might take place"</i> 4. The Plan should continue to support efforts to increase use of public transport and cycling. 5. In relation to flood risk, where undeveloped lands are identified as being of significant risk from flooding, the EPA recommend the 	<ol style="list-style-type: none"> 1. Submission is acknowledged, however taking into account submission no.56, the pNHA shall be as indicated on the zoning map in accordance with the boundaries agreed following successful appeal to the NPWS. 2 All amendments are assessed as a matter of course by the Planning Authority in terms of flood, water framework directive, SEA and ecological effects as specified in the Habitats Directive. 3 Noted, it is recommended that this wording will be incorporated in the objective in the final draft. 4 Noted, the existing plan has committed to the encouragement of sustainable transport links. Objectives T9 to T11 (Chapter 5) apply as they call for quality bus corridors, encouragement of park and ride and public transport and cycling routes. 5 Noted, this is standard practice and has been the case in preparing the current zoning pattern.

	<p>Flood Risk Management Guidelines are fully taken into account.</p> <p>SEA Statement should summarise</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report (and any associated submissions), have been taken into account; • The reasons for choosing the Plan adopted in the light of other reasonable alternatives; • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. 	<p>Noted- this will be carried out in the final stages of the plan preparation.</p>
	Chief Executives Recommendation	
	<ol style="list-style-type: none"> 1. Remove semi-natural open space as zoning for pNHA and buffer zone and replace with pNHA zoning for Loughmore Common. 2. That in relation to Objective IN1, 'Sewerage Facilities' that EPA suggestion that it be further amended be carried out. The additional wording will be <i>"Ensure that wastewater infrastructure <u>is adequate and appropriate and will keep pace with development that takes place in the plan area, in collaboration with Irish Water, to avoid any deterioration in the receiving waters into which any discharges from such plants might take place</u>".</i> 	
	SEA/AA comments	
	<p>The inclusion of the additional wording underlined above is considered to have beneficial effects, from both a general SEA perspective, and from the specific view points of AA. The revised wording will help to avoid overloading of waste water infrastructure which will reduce the chances of pollution to the Shannon which is an SAC site.</p>	

5	Name/Group:	Michael and Grainne McMahon, Caher road
	Submission:	Response
	<p>Objection to proposed new through road that would join Caher road with development lands and proposed school.</p> <p>It is claimed that Caher road is only wide enough for one car, its 'a single car road' and "It would almost certainly become a 'rat-run'".</p> <p>Concern is also expressed about having a footpath or cycleway connection instead of the road as this would they claim require a car park, likely to attract loitering.</p>	<p>By providing this additional link, the Council was seeking to apply one of the design principles set out in the Government guidance 'Sustainable Residential Development in Urban Areas' (DEHLG, 2009), in relation to layouts, namely (under the heading '<i>Connectivity and permeability</i>'): <i>'convenient access needs to be provided between and within areas, particularly to larger community and commercial facilities and to places of work. Routes within the area should be accessible for everyone and as direct as possible...'</i> (DEHLG, 2009, p20). The proposed link would have considerably shortened the distance for those relying on motor transport to reach the school sites and the neighbourhood park from the south side. The site is only 350 metres from the Caher road, whereas the next shortest alternative route is 2.5 kilometres in length.</p> <p>It is considered appropriate however, that in the context of the number of objections from local residents principally from Caher road, and the substance of concerns raised, that this road should be omitted.</p> <p>Concerns about alternative cycle route/footpath The provision of a footpath or cycleway would not necessitate the provision of a car park. However as stated above having regard to the number of objections to this it is recommended that the cycle and pedestrian link be removed.</p>
	Chief Executives Recommendations	
	<p>Alterations proposed</p> <p>1) Remove proposed additional road link to Caher road and cycle and pedestrian link.</p>	
	SEA/AA Comments:	
	No SEA or AA effects from the above as they relate to indicative routes, the addition or deletion of which are outside environmentally sensitive sites.	

6	Name/Group:	Derek Richardson (with petition signed by 23 local residents of Rathmale townland) Also see submission no.9 (Geraldine McInerney) and no.45 (Norman Long)
	Submission:	Response
	<p>Objection to proposed re-zoning of a vacant site, 1.22 hectares in extent, from agricultural to serviced sites to facilitate six detached houses at low density. This objection is accompanied by a petition signed by 23 residents in Rathmale townland.</p> <p>The grounds of the petition are:</p> <ol style="list-style-type: none"> The limited scope of the Bord Pleanala decision. The An Bord Pleanala decision was for one house only, it should not pave the way for a development seven times the original size. 	<p>The objection refers to the proposed re-zoning of a vacant site, 1.22 hectares in extent, from agriculture to serviced sites, to facilitate detached houses at low density. This re-zoning is, in response to a submission at Issues Stage by the landowner, which sought re-zoning to facilitate a low density housing scheme. The proposed rezoning is subject to a precondition that a suitable footpath and public lighting would be provided on the Pump road to link the development with the village, and is to facilitate 6 houses. Permission for a house on a part of the site that fronts the Pump road, 0.09 hectares in extent, was granted by An Bord Pleanala, overturning a Council decision to refuse (ref PL 91.244076). The adjoining road is characterised by extensive linear development of low density housing, which are zoned 'Existing Residential' in the Local Area Plan. There are also a number of existing housing clusters in the vicinity of the site.</p> <ol style="list-style-type: none"> The reasoning given for the An Bord Pleanala decision to overturn the Council's refusal of permission for one house, was that the agricultural zoning of this infill site was an anomaly on a belt of land following the Pump road, which was otherwise zoned 'Existing Residential' in recognition of the dominant use established along this road. The Inspectors Report for the appeal noted, that there are two cul-de-sacs off the Pump road, one of them with three detached houses diagonally opposite the appellant site on the

	<p>2. Undermining of the ‘Sequential principle’. Non compliance with a National Strategy Objective, enunciating a sequential principle: <i>‘efficient use of land by consolidating existing settlements...through re-use of underutilized land and buildings as a priority, rather than extending greenfield development’</i>. The proposal clearly represents an extension of greenfield development, for which there is ‘clearly no demand for or need’, when there is already ample land zoned and committed for housing closer to existing services (reference to Sli na Manach, close to Quinns cross in this context).</p> <p>3. Non conformity with current land use on the site and adjacent to the site. Current land use on the site and lands adjacent to the proposed use are for agriculture. The objectors claim that it is not appropriate to have housing</p>	<p>south side. The Inspector stated that any decision on zoning of the remainder of this holding (the current subject site) was for the Council to make and at another juncture. Therefore the ABP decision to grant one house at this location does not preclude the proposed zoning.</p> <p>2. The National Strategy does not preclude the proposed zoning. The National Strategy Objective referred to is of a general nature informing how lands should be selected for residential zoning. The ‘sequential principle’ referred to does not apply only to the Limerick suburbs in general as implied in the example chosen. It also applies to villages of which Mungret is one. In relation to villages, the Planning Guidelines <i>‘Sustainable Residential Development in Urban Areas’</i> (DEHLG, 2009) states the <i>‘New development should contribute to compact towns and villages’</i>. The proposed zoning of the subject site is for serviced sites, at a very low density to reflect the prevailing development in the vicinity. The aforementioned Ministerial Guidance also indicates that in order to offer an effective alternative to the provision of single houses in surrounding unserved rural areas, it is appropriate to consider proposals for lower density housing schemes, such as that proposed.</p> <p>3. It is not always possible, or even appropriate, to confine consideration of opportunities for new residential development to brown-field sites or to sites not in current agricultural use.</p>
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	backing onto lands for agricultural use.	
	4. Inadequate infrastructure: there is no public footpath on the Pump road for 300 metres, and inadequate public lighting.	4. Inadequate infrastructure. The site has been zoned subject to provision of a public footpath along the Pump road to link it to the village, and additionally benefitting existing residents. To conclude, taking into account Ministerial guidance and the established pattern of development in the vicinity of the site, and also having regard to the points above, it is considered appropriate to retain the 'serviced sites' zoning at this location.
	Chief Executives Recommendations	
	No change	
	SEA/AA comments	
	The site and use involved are minor in scale and would not have significant environmental effects- no changes to AA or ER required.	

7	Name/Group:	William Mulcahy, Baunacloka
	Submission:	Response
	1. Objection to proposed zoning of two of his sites (see submission map) as part of designation of proposed Natural Heritage Area for Loughmore Common. It is stated that the National Parks and Wildlife Service had previously agreed in 2007 to omit these two sites from the designation. A copy of the agreement letter from the NPWS with map indicating the sites to which it refers was attached to this submission.	1. The council acknowledges that the Loughmore common area was delisted as an pSAC but still remains as a Proposed Natural Heritage area. Communication from the NPWS dated 6 th and 25 th of November 2015 indicate that this is still the case. There were two successful appeals to the boundary of the PNHA which was changed in 2007. The maps will be altered to indicate those boundaries which have been confirmed by NPWS.
	2. The submission states that Shannon Development need to use the drain running through the pNHA for surface water drainage	2. This is a matter for Shannon Commercial Properties (successor to Shannon Development) and the NPWS. Under the Planning legislation the

	<p>from the Raheen Business Park. Any special conservation requirements that would involve impeding this drainage could have serious repercussions for the business park.</p> <p>3. The submission objects to the proposed buffer zone.</p> <p>4. The submission questions how the area is going to be managed, and what responsibility the private landholders such as him would have in controlling public access and shooting of game.</p> <p>5. The submission objects to the proposed changes to the distributor roads. While roads are linked to development, it is possible that he may require this holding for farming in the future and the proposed position of roads makes this more difficult.</p>	<p>Council are to list the conservation sites and their boundaries. Overseeing the management of same are the functions of the NPWS.</p> <p>3. Having regard to the legal history of the site and recent discussions with the NPWS it is recommended that the buffer zone be removed.</p> <p>4. The management of private property remains the responsibility of the owner.</p> <p>5. The changes to the distributor roads are indicative only. The road is necessary for the future development of the wider Mungret area. In the interim these indicative routes will not interfere with farming practices.</p>
	Chief Executives Recommendations	
	<p>1. Alter zoning of pNHA to be specific to that designation.</p> <p>2. Remove the buffer area adjoining the pNHA.</p> <p>3. Semi-natural open space around Recorded Monuments to be removed and replaced in the case of Monument LI013-007 by a 50 metre buffer zone.</p> <p>4. Rewording of Objective MLO12 to ensure protection of archaeology in the area</p> <p>5. Rewording of MLO14 in relation to proposed NHA.</p> <p>6. Amend Section 2.4.3 (Ch.2 Strategy) and figures for residential development lands in table 5.</p>	
	SEA/AA comments	
	<p>While the buffer zone will be removed, the site will be shown in it's NPWS designation as a proposed Natural Heritage Area. No changes required to AA Screening or Environmental Report.</p>	

8	Name/Group:	Fehily Timoney &Co. on behalf of Shannon Commercial Property (SCP) Ltd.
	Submission:	Response
	<p>Requests that the Council consider re-zoning a site in Rosbrien in the north-east of the Local Plan area (c 20 hectares in extent) from agricultural to residential land use. The lands were zoned Residential in the 2006 LAP but removed in the 2011 LAP to 'comply with the Council's Core Strategy calculations'.</p> <ol style="list-style-type: none"> 1. The submission claims that by re-zoning this land as residential it would compensate for the reduction of residential zoned land proposed in Mungret-Loughmore and would therefore be consistent with the Core Strategy. 2. According to the submission the site is coherent, flat and has sewer and water connections, and is close to built up areas, existing services and amenities. A map is enclosed showing that the site is located sequentially closer to the city centre than any other part of the Southern Environs Local Plan area. 3. In relation to flood risk, the consultants submit an extract from the CFRAMs study that shows that only 10% of the 	<p>The total quantum of land was reduced from 190 hectares in the 2007 Local Area Plan, which included the subject site, to 123 hectares in the 2011 LAP. The 'Core Strategy target' is 124 hectares, and not the 108.5 hectares which was indicated in the proposed Amendment. The latter figure was the target in the Southern Environs LAP and did not take into account Variation no.1 to the County Development Plan which updated the Core Strategy. This error will be rectified in Table 5.</p> <ol style="list-style-type: none"> 1. The need to compensate for the proposed diversion of lands zoned for residential to other land uses has already been acknowledged in the proposed Amendment by making compensatory provision for new residential development within the Mungret Loughmore area. Therefore there is sufficient land zoned for residential purposes to meet the population target, as set out in the Core Strategy for the plan period. 2 and 3) In respect of points 2 and 3 it is acknowledged that there are merits in the subject site, but these are outweighed by the merits of zoning sufficient land in the Mungret Loughmore area for residential development, to enable the development of infrastructure and support new schools, a neighbourhood park and other amenities for which provision is being made in the area.

	<p>subject site is at risk of flooding (at the western edge of the site).</p> <p>4. The submission suggests that the amount of residential zoned land will increase from 115 hectares to 123 hectares. They question where the basis for this claim is.</p> <p>5. The submission questions the assumption which they claim is being made by the Council in the Local Area Plan that educational community zoning can contribute towards meeting the Core Strategy as residential development is open for consideration in such lands.</p>	<p>4. The consultants are erroneous in suggesting that the Council, will have zoned 123 hectares, increasing the quantum of residential zoned land, as a result of this amendment. The only table in which this figure is indicated in the proposed Amendment (Table 5, p14) showed '115.1' hectares in the column 'LAP as amended'. Therefore there was an overall reduction in the amount of residential land proposed. However as a result of the removal of the buffer zone around the pNHA, and its rezoning to residential use, the amount of land zoned residential is increased to 122 hectares. Section 2.4.3 and Table 5 will be altered to reflect this.</p> <p>5. The quantum of land zoned for new residential development does not include lands zoned for Educational or Community Use.</p>
	Chief Executives Recommendations	
	<p>No change to zoning</p> <p>Alter Section 2.4.3 and Table 5 with adjusted figures for the amount of residential zoned lands and the Core Strategy.</p>	
	SEA/AA comments	
	<p>No changes to SEA or AA required as the zoning has been carried out in accordance with the Core Strategy and in order to provide for an adequate range of uses within the area of the amendment. This is consistent with good planning practice.</p>	

9	Name/Group:	Geraldine McNerney (email submission, address unspecified)
	Submission:	Response
	Objection to rezoning of lands at Rathmale Mungret for serviced sites. Site of concern and grounds of submission as per submission no.6	Response as per submission no. 6
	Chief Executives Recommendation	
	No change	
	SEA/AA comments	
	No changes to AA or ER required.	

10	Name/Group:	Jean Dennehy, Caher road (Jerry Dennehy's email)
	Submission:	Response
	<p>Objection to proposed new through road that would join Caher road with development lands and proposed school.</p> <p>The concerns can be summarized as relating to the current status and use of the Caher road and probability of traffic over-load. See summary of grounds of this and other submissions in 'Main Issues Raised' (Section 1.4) of this document.</p> <p>Reference to the road having a 3 ton weight limit and speed limit of 50km/hr.</p>	Response as per other submissions in respect of proposed new road link to Caher road.
	Chief Executives Recommendations	
	See recommendations in submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

11	Name/Group:	Finola and Finbar Sharkey, Caher Road
	Submission:	Response
	<p>Objects to proposed new road link to Caher road, as the road is a rural road with 5 working farms. <i>'It would be very difficult and expensive to upgrade it'</i>. Submission emphasises the amenity value of the road as it currently stands and also the value of its hedgerows for</p>	Response as per other submissions in respect of proposed new road link to Caher road.

	wildlife.	
	Chief Executives Recommendation	
	See recommendations in submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

12	Name/Group:	Paddy and Elizabeth Richardson, Caher Road	
	Submission:		Response
	Objects to proposed new road link to Caher road, listing six grounds including public safety and impact on 'the pastoral agricultural nature of the area'. Claims that the junction of Patrickswell with the Caher road is already busy. There is already a roundabout on the R526 that would give easier access to the rear of Mungret College.		Response as per submission no.5 and all other submissions in respect of proposed new road link to Caher road. Alternative road from roundabout on the R526 referred to is not feasible without crossing the Loughmore Common pNHA. This is likely to undermine its integrity as a designated habitat.
	Chief Executives Recommendation		
	Recommendation as per submission no 5		
	SEA/AA comments		
	Comments as per Submission no.5		

13	Name/Group:	Denis and Helen O'Connor, Caher Road	
	Submission:		Response
	Objects to proposed new road link to Caher road, claiming that it will bring noise and air pollution and anti-social behaviour.		Response as per submission no.5 and other submissions in respect of proposed new road link to Caher road.
	Chief Executives Recommendation		
	Recommendation as per submission no.5		
	SEA/AA comments		
	Comments as per Submission no.5		

14	Name/Group:	David and Catherine Geary, Caher Road	
	Submission:		Response
	Objects to proposed new road link		Response as per Submission no.5 and other

	to Caher road. They also claim that alternative route through Loughmore is a viable alternative.	submissions in respect of proposed new road link to Caher road. Alternative road from roundabout on the R526 referred to is not feasible without crossing the Loughmore Common pNHA. This is likely to undermine its integrity as a designated habitat.
Chief Executives Recommendation		
As per Submission no.5		
SEA/AA comments		
Comments as per Submission no.5		

15	Name/Group:	John Joe Hallinan Caher Road
	Submission:	Response
	<ol style="list-style-type: none"> Points as per other submissions objecting to proposed new road link to Caher road, namely that the proposed new link road is unacceptable as it would introduce traffic that the Caher road does not have the capacity for. Points to the presence of extensive flooding over the lands to the rear (north) of Caher road, after a recent spell of bad weather. The implication is that the said lands would not be suitable for an access or zoning, and that the Council might have overlooked the risk of flooding. 	<p>1: Objection to proposed new road link: See response to Submission no.5</p> <p>2: Flood risk: The Planning Authority carried out a site assessment during the recent period of most intense flooding (16/12/2015) to ascertain the extent of flooding and whether or not this would affect the proposed road. While there was a flooded hollow in one of the fields off the Caher road there was not flooding in either the location of the proposed road or the area proposed for new residential development.</p>
Chief Executives Recommendation		
As per submission no.5		
SEA/AA comments		
Comments as per Submission no.5		

16-17	Name/Group:	16: Mr Shane Barrett, Dún an Óir, Caher road 17: Ms Anne Barrett, Dún an Óir, Caher road
	Submission:	Response
	Objection to proposed new through road that would join Caher road with development lands and proposed school.	Response as per submission no.5 and other submissions in respect of proposed new road link to Caher road.
	Chief Executives Recommendation	
	As per submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

18	Name/Group:	Terence Barrett, Caher road
	Submission:	Response
	Objection to proposed new through road that would join Caher road with development lands and proposed school. Additionally implies that the lands zoned for agriculture in the current LAP should remain so to create an adequate buffer.	Response as per submission no.5 and other submissions in respect of proposed new road link to Caher road. Response as per Submissions 39 and 40:
	Chief Executives Recommendation	
	As per submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

19	Name/Group:	Dean Barrett, Caher road
	Submission:	Response
	Objection to proposed new through road that would join Caher road with development lands and proposed school. Fears that 'the proposed plan would be a safety issue for all the young children that reside in the area'.	Response as per submission no.5 and other submissions in respect of proposed new road link to Caher road.
	Chief Executives Recommendation	
	As per Submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

20	Name/Group:	Grace Barrett, Caher road
	Submission:	Response
	Objection to proposed new through road that would join Caher road with development lands and proposed school. Fears that 'the proposed plan would be a safety issue for all the young children that reside in the area'.	Response as per submission no.5 and other submissions in respect of proposed new road link to Caher road.
	Chief Executives Recommendation	
	As per submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

21	Name/Group:	Sean Hanley, Caher road
	Submission:	Response
	Objection to proposed new through road that would join Caher road with development lands and proposed school. He claims that alternative route from the Loughmore roundabout is a viable alternative.	Response as per submission no.5 and other submissions in respect of proposed new road link to Caher road. Alternative road from roundabout on the R526 referred to is not feasible without crossing the Loughmore Common pNHA. This is likely to undermine its integrity as a designated habitat. (see Subm no.12)
	Chief Executives Recommendation	
	As per submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

22	Name/Group:	John and Kathleen Browne, Bruncuinn, Caher road
	Submission:	Response
	Objection to proposed new through road that would join Caher road with development lands and proposed school.	Response as per submission no.5 and other submissions in respect of proposed new road link to Caher road.
	Chief Executives Recommendation	
	As per submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

23	Name/Group:	Padraig O'Reilly, 19 Mungret Woods, Mungret.
	Submission:	Response
	<p>Claims that there is too much emphasis on apartments and objects to this.</p> <p>1) 'Apartments are not suitable for elderly people.'</p> <p>2) He suggests that apartment developments tend to generate social problems and should be avoided, especially where there is no need as in Mungret Loughmore where there is copious space for other forms of lower density residential development.</p> <p>In support of his argument he cites the example of Ballycummin village in which there are mixed use and apartments. He claims it has deteriorated due to commercial vacancies, residents not paying management fees, and anti-social behaviour.</p> <p>Agrees with the need for social housing at 10% of all housing, in well planned properly serviced communities.</p>	<p>The Council is not envisaging that all or even most of the new residential development of the masterplan area will be in the form of apartments. It merely suggests proximity to the neighbourhood hub should be taken into account in consideration of appropriate housing density which is in accordance with national planning guidance.</p> <p>Objective MLO4, in the proposed amendment, requires compliance with DoECLG guidelines on apartments which were recently published in relation to apartment sizes etc. Taking into account observations raised by the DoECLG it is proposed that the Objective be amended, in order to ensure proper standards for apartments in the area.</p> <p>The quality of design, the provision for amenities and community facilities and management of the common areas will all be considered as part of the development management process. The Planning Authority will ensure the supply of any one house type in a development scheme is realistic and appropriate to its context in both space and time.</p> <p>In relation to three other points:</p> <ul style="list-style-type: none"> • Residential component of Mungret college is considered important due to the common advantages of passive surveillance and the mutual proximity of housing with community and small scale commercial uses. • Housing for the elderly: The need for adequate consideration to be given to the special access requirements of the elderly is recognized by the Council. For instance in the County Development Plan Dev Management chapter, p10-4, it is stated that the Council will look for consideration of the needs of the elderly and use of the principles of universal design in any scheme of 5 or more units.

		<ul style="list-style-type: none"> • Social housing: The Council is obliged to conform with national legislation in securing the provision of social housing, and this means that social housing has to be provided in situ at 10% of all housing. This is so that it would be in compliance with Part V of the Planning and Development Act as amended by the Urban Regeneration and Housing Act 2015, and also in accordance with the Joint Housing Strategy.
	Chief Executives Recommendations	
	Change in wording of Objective MLO4 to ensure compliance with DoECLG planning guidance.	
	SEA/AA comments	
	The council is committed to policies that deliver a suitable mix of housing types, this is consistent with good planning practice. No change to SEA or AA required	

24-38	Name/Group:	<p>Submissions in relation to Caher Road</p> <p>24: Anna O'Neill, Ballynoe, Caher Road</p> <p>25: Neilus O'Neill</p> <p>26: Robert Fitzgerald</p> <p>27: Emma Fitzgerald</p> <p>28: Aoife McNamara</p> <p>29: Finola Sharkey</p> <p>30: Tony McNamara</p> <p>31: Bronagh O'Neill</p> <p>32: Niamh McNamara</p> <p>33: Deirdre McNamara</p> <p>34: Jean Dennehy</p> <p>35: Terence Barrett</p> <p>36: Dean Barrett</p> <p>37: Shane Barrett</p> <p>38: Anne Barrett</p>
	Submission:	Response
	<p>An objection is signed by the above residents, to the proposed new road link off Caher road.</p> <p>A request is made that <i>'the green space on the right hand side of the road coming down the Caher road to remain a green space and not to be allowed to be developed for housing or</i></p>	<p>As per other submissions relating to Caher road</p> <p>See Response to Submissions no. 39 and no.40 (Helen Keogh and Sean Rushe respectively).</p>

	<i>commercial use</i> '. (This would appear to refer to the proposed change of zoning from agricultural in the current LAP to residential in an area 100 metres to the north of Caher road residential properties)	
	Chief Executives Recommendations	
	As per Submission no.5	
	SEA/AA comments	
	Comments as per submission no.5	

39-40	Name/Group:	39: Helen McKeogh, Ballynoe, Caher Road 40: Sean Rushe, Ballynoe, Caher Road
	Submission:	Response
	<p>Objection to:</p> <p>A. proposed re-zoning of agricultural land to residential use.</p> <p>B. Proposed new link road to Caher road.</p> <p>Grounds of objection:</p> <p>In relation to proposed re-zoning:</p> <ol style="list-style-type: none"> 1. The proposed re-zoning is not necessary as it will leave a surplus of zoned land of 6 hectares over the Core Strategy requirements. (see also submission no.50) 2. The proposed zoning will have detrimental effects on local residents in the area of Caher road. 3. Zoning should according to national guidance, take place in a sequential manner working out from the centre of an urban area, whereas the proposed new zoning represents 'leap-frogging'. 	<p>In relation to point B (proposed new link) see response to submission 5.</p> <p>In relation to point A, the proposed re-zoning:</p> <ol style="list-style-type: none"> 1. Taking into account proposed zoning alterations recommended in this report and corrections to figures in Table 5, there will be a slight deficit in the hectares available for new residential development (of 2 hectares) compared to that required in the Core Strategy allowing for a 50% overhead. Therefore the amount of residential zoned land is considered appropriate. 2. Development of residential lands is 100 metres from the backs of existing houses and the intervening lands remain agricultural, which still represents a generous green belt. 3. The site referred to in the submission is contiguous with the site being zoned for the secondary school and is therefore not considered to be leap frogging of development.

	4. Re-zoning of Council lands from agricultural to residential use appears to be putting the Council interest above that of the local community.	4. When zoning land the Planning Authority are restricted to consider the proper planning and sustainable development of the area in terms of identifying the quantity of land needed for various classes of use over the plan period and not the particular interests of landowners. It should be noted that over 50% of the lands owned by the Council in Mungret Loughmore area are proposed to be zoned for community uses such as education, community and open space recreation uses.
	Chief Executives Recommendations	
	See Response to Submission no.5 in relation to proposed Caher road link road.	
	SEA/AA comments	
	As per comments in relation to submission no.5	

41	Name/Group:	Mr.Tony Byrnes, Caher Road.
	Submission:	Response
	Objection to proposed new road link off Caher road	As per submissions in relation to proposed new road link to Caher road
	Chief Executives Recommendation	
	See Response to Submission no.5	
	SEA/AA comments	
	As per comments in relation to submission no.5	

42	Name/Group:	John and Marian Howard
	Submission:	Response
	Objection to proposed new road link off Caher road	As per submissions in relation to proposed new road link to Caher road
	Chief Executives Recommendation	
	See Response to Submission no.5	
	SEA/AA comments	
	As per comments in relation to submission no.5	

43	Name/Group:	Brendan Fitzgerald
	Submission:	Response
	Objection to proposed new road link off Caher road	As per submissions in relation to proposed new road link to Caher road
	Chief Executives Recommendation	
	See Response to Submission no.5	
	SEA/AA comments	
	As per comments in relation to submission no.5	

44	Name/Group:	Jim Dennehy
	Submission:	Response
	Objection to proposed new road link off Caher road	As per submissions in relation to proposed new road link to Caher road
	Chief Executives Recommendation	
	See Response to Submission no.5	
	SEA/AA comments	
	As per comments in relation to Submission no.5	

45	Name/Group:	Norman Long
	Submission:	Response
	States that he has a 3 m wide right of way along the south of Seamus Haye's site, for which it is proposed to change land use to serviced sites. Mr.Long claims that the right of way is the only means of access to his agricultural lands to the rear of the site. A copy of a site layout map drawn from a recent planning application shows this right of way.	<p>The site layout plan that was submitted with the planning application for a house at the front of the subject site (Pl.ref 12/970) shows a right of way. The application site made allowance for this right of way, leaving its road frontage as 20 metres. The lands zoned for serviced sites has a frontage of 23 metres, so the right of way would pass through it.</p> <p>The right of way is a legal matter between two parties, however to avoid multiplicity of entrances within a short distance of each other the right of way should be accommodated within the one entrance and accessway. Objective MLO5 'Serviced Sites' shall be altered to indicate the right of way.</p>
	Chief Executives Recommendation	
	Objective MLO5 to be altered as follows: <u>iv) the layout shall not be such as to obstruct any legal rights of way held by third</u>	

	<u>parties. Rights of way shall be specifically indicated on site layout plans submitted as part of any future planning application. They should use the single road and entrance to serve this site.</u>
	SEA/AA comments
	No SEA/AA effects from above

46-48	Name/Group:	46:Albert and Carol O’Grady, Caher Road 47: Breda Fitzgerald, Caher Road 48: Barry Fitzgerald, Caher Road.
	Submission:	Response
	Objection to proposed new road link off Caher road	As per submissions in relation to proposed new road link to Caher road
	Chief Executives Recommendation	
	See Response to Submission no.5	
	SEA/AA comments	
	As per comments in relation to Submission no.5	

49	Name/Group:	Marguerite Doyle, 32 nd Limerick St.Pauls Scouts Group
	Submission:	Response
	<p>Submission comes with an attachment outlining the size of the scouts group, its roots in the local community, its range of activities, and the need for new accommodation. The current premises is in the parish hall of St.Pauls but this is at capacity and its future is uncertain.</p> <p>Requests that the ‘Educate Together’ building which is to be vacated by that school for their new premises, be considered for use by the scouts group.</p> <p>Concern with the suggestion that the former swimming pool could be used as a scout hall: <i>‘our concern would be the cost and time it would take to make this site fit for purpose’</i></p>	<p>Discussions have already taken place between the Scouts Group and the Property section of Limerick City and County Council in relation to accommodation needs.</p>

	Chief Executives Recommendations	
	No Change	
	SEA/AA comments	
	No SEA/AA effects	

50	Name/Group:	Mungret Community Council HRA Planning on its behalf, with petition signed by 184 residents.
	Submission:	Response
	<p>Concerns/requested amendments</p> <p>1. Requests the omission of proposed new link road to Caher road</p> <p>The submission indicated that the proposed amendment does not give any justification for the proposed road and given the existing nature of Caher road the Plan does not give sufficient evidence to substantiate that the Caher road could safely accommodate the increased traffic flows. Therefore on the grounds of traffic safety and the fact there are sufficient alternative indicative distributor roads identified in the Plan following the proposed Amendment, the Community Council requests that proposed link road is omitted.</p>	<p>By providing this additional link, the Council was seeking to apply one of the design principles set out in the Government guidance 'Sustainable Residential Development in Urban Areas' (DoECLG, 2009), in relation to layouts, namely (under the heading '<i>Connectivity and permeability</i>'): '<i>convenient access needs to be provided between and within areas, particularly to larger community and commercial facilities and to places of work. Routes within the area should be accessible for everyone and as direct as possible...</i>' (DEHLG, 2009, p20). The proposed link would have considerably shortened the distance for those relying on motor transport to reach the school sites and the neighbourhood park from the south side. The site is only 350 metres from the Caher road, whereas the next shortest alternative route is 2.5 kilometres in length.</p> <p>It is considered appropriate however, that in the context of the number of objections from local residents principally from Caher road, and the substance of concerns raised, that this road should be omitted.</p>

<p>2. Prioritisation of general transport objectives ‘in the interests of development clarity’</p> <p>a) regarding proposed routes and road hierarchy, the submission request that: <i>‘the proposed amendments to the indicative distributor road layout is revised to illustrate a preferential hierarchical function of these roads illustrated on LAP Map 3 that demonstrates consistent with the Design Manual for Urban Roads and Streets’ (DoECLG) to facilitate access to all of the development lands and that the vehicular access to the area from the R526 and Patrickswell direction is identified as being via the new route illustrated in Figure 2” [the through road from the R526 close to Raheen roundabout linking to junction at Moores lane]</i></p> <p>b) Regarding phasing and development of schools vis a vis the road network, so as to avoid any adverse traffic congestion, the submission requests that: <i>‘The proposed amendment is revised to ensure that the development of any new schools is encouraged in a manner or phasing where it would benefit from more than one vehicular access from the existing road network so as to avoid any adverse traffic congestion that might otherwise present itself on the surrounding network as a consequence of school traffic where it is reliant on a single access, or unless it can be established that there is sufficient capacity on the existing network to accommodate additional peak hour traffic movements without congestion’.</i></p>	<p>2: See below 2a and 2b</p> <p>a) Distributor roads, to be renamed link roads as per response to DEHLG submission (no.1) and in accordance with DMURS. The link roads to connect the R526 and those coming from the Patrickswell direction will be as those shown in Figure 2 of the submission, namely a through road from the R526 close to Raheen roundabout to the junction at Moores lane.</p> <p>b) A Traffic and Transport Impact assessment has been carried out for the Part 8 for the proposed upgrading of the R859, construction of a new junction at Moores Lane and section of the link road joining it from the south to serve the two proposed primary schools. This Traffic and Transport Impact Assessment has established that with the proposed upgrades the road network would have the capacity to accommodate the traffic generated by the proposed schools and the future development of lands in the area.</p>
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<p>3. Concern about Change of Use zoning of Mungret College complex to include “Mixed use” and “Residential Use”.</p>	<p>3. The existing zoning splits this site into various zoning uses, ie Enterprise and Employment to the front, covering the existing Mungret college and extensions, retail and commercial covering the free-standing out-building to the rear, and immediately surrounding yards; and the community zoning covers the rear courtyard and the lands currently occupied by the ‘Educate Together’ school.</p>
<p>3a) The Community Council are of the opinion that the ‘nodal point’ objectives for the masterplan area could undermine the settlement integrity and established commercial function of Mungret village by enabling through the ‘mixed use’ zoning, new commercial development to occur within the Mungret complex at the expense of, or in preference to that located in the village.</p>	<p>The Mixed Use zoning was proposed to allow for the development of a neighbourhood hub and courtyard concept at this location. Having regard to the investment required for the restoration, upkeep and running of the complex and the fact that there are no detailed plans for any particular use at this location it is considered that the zoning proposed allows greater flexibility in terms of the future development of the site. It is also considered that Objective MLO15, will provide an adequate framework to ensure the land use mix is both sustainable and responsive to local community needs.</p> <p>3a) As already indicated in the preamble to ‘Mungret College Complex’ in the proposed Amendment <i>“The complex is ideally located to serve as a neighbourhood hub, ... The location is appropriate taking into account its nodal position in relation to the lands zoned for new residential development, within a 800 metres ‘pedshed’ (ie a pedestrian catchment with a radius corresponding to a 10 minutes walk); the projected population growth in these zoned lands; and the prominent location of the main college building and annex vis-a-vis the Neighbourhood</i></p>

<p>(3b) Request to omit 'Residential component from zoning of Mungret college complex</p>	<p><i>Park."</i></p> <p>The extent of retail is limited according to the phasing of residential development. Development of a neighbourhood hub would not undermine the role of Mungret village as a separate local centre, as Mungret village is at least 1 km from the majority of these residential zoned lands south of the neighbourhood park. It would therefore not be practical to designate the village centre alone as the neighbourhood centre for this new community.</p> <p>Point 3(b) concern about proposed residential component in Mungret college complex.</p> <p>Having regard to the total size of the complex ,ie 1.4 hectares, it is considered both appropriate and viable to include for a mix of uses rather than entirely community uses. National planning guidance promotes mixed use development to ensure that village and town centre areas are both living and working spaces (Local Area Plans Guidelines for Planning Authorities, DECLG 2013, p31). For larger scale developments, such as that which will be accommodated in the Masterplan area south of Mungret college, national planning guidance promotes the provision of '<i>a good mix of uses, housing facilities and amenities that help engender a successful community</i>'. (Urban Design Manual, A best practice guide DEHLG 2009,p32). With respect to such developments the uses '<i>that attract most people</i>' should be located '<i>in the most accessible places</i>'.</p>
<p>(3c) Request to place greater emphasis on community related facilities in preamble and Objective MLO15.</p>	<p>Point 3c The priority given to community uses for the complex is already clearly expressed in the section 'Mungret</p>

	<p>4. Preserving Accessibility to and from Mungret Village. Requests additional wording as follows: <i>“ The Council shall engage with the public and any relevant interest groups in relation to any proposals to alter points of vehicular access to/from Mungret village and that any such proposal shall be implemented by the Council in agreement with the local community’</i> This is to address the concern that Objective MLO16 which is worded broadly without any accompanying details, could be used to justify introduction of road closures or prioritizing of traffic movements in a way that would reduce traffic coming from the N69 to the village.</p> <p>5. Excess of residential zoned lands. The Community Council request that the Council revert to the agricultural zoning of lands, instead of the proposed residential, 6.6 hectares in extent, to the south of the secondary school site. In support of this request they claim that the amount of land zoned for residential development is 6.6 hectares in excess of what the Core Strategy says is required, and that the most logical way to rectify this is to reconsider the proposed addition of the said lands.</p>	<p>Complex’ both in the preamble and in Objective MLO15(b). However there is scope for further clarification to the text in Chapter 9, Section 9.2.1.1 to emphasise the prioritisation of community uses. The Land use Zoning Matrix shall also be amended for the purposes of clarity.</p> <p>4: Concern about wording of Objective MLO16, that it might allow for future closing off of access into the village. The Council consults and seeks to engage with the public as a matter of course in respect of any such proposals through the Part 8 or other process. However, the concern is acknowledged, and the wording of MLO16 will be altered accordingly, but omitting the suggested clause <i>‘any such proposal shall be implemented by the Council in agreement with the local community’</i>. The reason this clause is omitted is that it is the role of the Council to put in place safe traffic management, and there might be circumstances where the alteration of points of access or design are required for traffic or pedestrian safety, and these over-ride any local objections.</p> <p>5: The Core Strategy according to the Amendment was 108.5 hectares, however as noted in response to Submission no.8, this is erroneous. The correct figure as set out in Variation no.1 in the County Development Plan is 124 hectares. Taking into account proposed zoning alterations recommended in this report there will be a 2 hectare deficit in available residential development land compared to the amount required in the Core Strategy. Therefore the amount of residential zoned land is appropriate.</p>
	Chief Executives Recommendation	
	<ul style="list-style-type: none"> Land Use Matrix to be included 	

	<ul style="list-style-type: none"> • Omission of proposed additional link road to Caher road (as per other submissions) • Alter text in section 9.2.1.1 in Chapter 9 ('Land Use Zoning') • Alter wording of Objective MLO16 <p>'To protect and enhance the public realm of the village centre (defined on map), with emphasis on minimisation of <u>extraneous</u> through traffic, <u>on</u> inclusive access, and <u>on</u> improvement of pedestrian safety and environment. <u>The Council shall engage with the public and any relevant interest groups in relation to any proposal to alter points of access to/from Mungret village.</u>'</p>
	SEA/AA comments
	No SEA/AA effects.

51	Name/Group:	Mungret Heritage Society
	Submission:	Response
	<p>Suggestions:</p> <ol style="list-style-type: none"> 1) That the term 'Mungret Abbey Complex' be used in Objective MLO1 (p33) be altered to Mungret Monastic Complex which is the term used in Objective MLO12 (p37). 2) The name Mount Temple House applied to the protected structure on page 37 be altered to its correct title namely 'Mount Mungret House'. 3) That the proposed walkway on Map 2 running south from the main road to the distributor road should also be shown to its fullest extent on Map 6. This map, at present, shows only a minor portion of the said walkway. 	<p>The Planning Authority concurs with the suggested alterations, to rectify the errors and inconsistencies referred to.</p>
	Chief Executives Recommendations	
	<ol style="list-style-type: none"> 1) Alter the term 'Mungret Abbey Complex' under Objective MLO1, p33 to 'Mungret <u>Monastic</u> Complex'. 2) Correct the title 'Mount Temple House' under Objective MLO11 (p37) to 'Mount <u>Mungret</u> House' 3) Show the proposed walkway to its fullest extent on Map 6. 	

	SEA/AA comments
	The inclusion of the new alterations for clarification purposes is welcomed. They do not warrant any changes to AA screening or the Environmental report.

52	Name/Group:	Mungret Woods Residents Committee
	Submission:	Response
	<p>The residents request that:</p> <ol style="list-style-type: none"> 1) The provisions of Objective MLO15(b) and the associated 'Mixed Use' land use zoning provision for Mungret College complex are amended to omit reference to facilitation of a residential component. 2) The proposed 'Mixed use' zoning be omitted and existing community land use zoning objectives be maintained, in order to protect the existing Mungret village as the commercial core. <p>See also submission no.50 (Mungret Community Council) which make the same points (points 3a and 3b)</p>	<p>See response to submission no.50 (points 3a and 3b)</p>
	Chief Executives Recommendations	
	See recommendations in relation to submission 50	
	SEA/AA comments	
	The scale of the issue is not sufficient to cause environmental effects- no change to Environmental Report or AA screening required	

53	Name/Group:	Simon Bradshaw, Bilfinger GVA Ltd on behalf of specific assets of Gerard O'Rourke (in receivership).
	Submission:	Response
	<p>Claims that the replacement of residential zoning by a proposed buffer zone around the proposed Loughmore Common pNHA, 'removes the development potential of a large area to the south and creates an unusually shaped site which may be difficult to develop'.</p> <p>Questions the need for a buffer zone, when the requisite assessments carried out as part of the</p>	<p>The buffer zone is being removed (see submissions no.7 and no. 56), this will inter alia address the concerns raised in this submission.</p>

	<p>development management process, would inform the appropriate siting and form of development in any case.</p> <p>Suggest two alternative options:</p> <p>1) The preferred option of removal of the buffer zone, controlling the final form of development through development management systems;</p> <p style="text-align: center;">or</p> <p>2) Retention of a buffer zone, but of reduced width, being 10 metres instead of the proposed 50 metres.</p> <p>States in support of this latter option, that to protect designated habitats, national guidance in relation to the extractive industry outline that quarries should '<i>provide a minimum buffer zone of 10 metre width</i>'.</p> <p>The relevant guidance in this case is <i>Environmental Management in the Extractive Industry (Non-Scheduled Minerals) Guidelines (EPA, 2006)</i>.</p> <p>See also Submissions no.7 and no. 56 in respect of the proposed buffer zone.</p>	
	Chief Executives Recommendations	
	Removal of buffer zone and zone residential; retain pNHA	
	SEA/AA comments	
	While the buffer zone will be removed, the site will be shown in it's NPWS designation as a proposed Natural Heritage Area. This will not require any changes to the AA screening or Environmental Report.	

54	Name/Group:	Majella Lowe, Caher Road
	Submission:	Response
	Objects to proposed new road link to Caher road, grounds as per other submissions on this proposal. ,	As per submissions in relation to proposed new road link to Caher road
	Chief Executives Recommendation	
	See recommendations in submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

55	Name/Group:	Brian Duhig, Ballynoe, Mungret (see also submissions 39, 40)
	Submission:	Response
	<p>Objection to:</p> <p>A. proposed re-zoning of agricultural land to residential use.</p> <p>B. Proposed new link road to Caher road.</p> <p>Same objection and grounds for objection as per submissions 39 (Helen McKeogh) and 40 (Sean Rushe)</p>	As per submissions in relation to proposed new road link to Caher road
	Chief Executives Recommendation	
	See recommendations in submission no.5	
	SEA/AA comments	
	Comments as per Submission no.5	

56	Name/Group:	Pat Ryan for and on behalf of Mike Fenton and Bill Mulcahy
	Submission:	Response
	<p>Submission concerns the proposed Natural heritage Area of Loughmore Common and the proposed buffer zone.</p> <p>This submission suggests the following changes, citing evidence about changes in proposed designation of the site and also from Dr.Goodwillie's survey (1992) of turloughs over 10 hectares for the NPWS and subsequent assessments:</p> <ol style="list-style-type: none"> 1. Removal of the buffer zone as proposed. Cites Dr.Goodwillie's acknowledgement that the site has dried as a consequence of the construction of the canal, and therefore cannot any longer support swans. The birds found in the area are not protected species. 2. Loughmore Common pNHA should be zoned agricultural land rather than semi-natural open space as proposed, from perspectives of management, security and also given the scientific evidence. <ol style="list-style-type: none"> a. Grazing/management: <i>'The moderate grazing regime operating on the Common is not inimical to plant propagation and</i> 	<p>1 The buffer zone will be removed.</p> <p>2: Noted, however the Council is obliged to take into account the current pNHA designation. The boundaries of the pNHA will be those arrived at in 2007 following appeals to the NPWS regarding the site boundaries.</p> <p>a. Noted- grazing is an</p>

	<p><i>can enhance the situation while the drying out continues’.</i></p> <p>b. Security Suggest that clarification is required as to who will police the Common when the surrounding areas become fully developed.</p> <p>c. Scientific evidence. Refer to the de-listing of the site as a pSAC following a successful appeal; however due to the continuance of a designation of this site as a NHA, <u>the site is not in fact a proposed NHA</u>, and therefore landowners were not given the opportunity to appeal the designation, even though it was considerably downgraded. It is given a C rating (average or reduced conservation) on this account.</p> <p>3. Removal of the reference to Loughmore Common as a turlough, and correction of its title to Loughmore Common instead of Commons.</p> <p>4. That further surveys should be carried out, by the NPWS. This was recommended by both Peadar Caffrey (Assistant Director of Duchas) and Dr.Jim Ryan, turlough specialist Duchas).</p>	<p>important part of the management of such sites.</p> <p>b. The buffer was intended to provide a degree of separation from surrounding developed areas. The policing of private property is for the owners rather than the council.</p> <p>c. Noted however communications from the NPWS dated 6th and 25th November indicate that the site is still a pNHA site.</p> <p>3: The updated site synopsis from November 2009 continues to refer to the site as a turlough while saying that “Loughmore is drier today than it has been in the past”. As the council is obliged to take into account listed sites, the words turlough will continue to be used.</p> <p>4 This is a matter for the NPWS.</p>
	Chief Executives Recommendations	
	<p>1) The buffer zoned to be removed with notification zones around the recorded monuments.</p> <p>2) The title of Loughmore Commons Turlough to be Loughmore Common Turlough.</p> <p>3) Change wording of Objective MLO14 to omit references to ‘buffer zone’.</p>	
	SEA/AA comments	
	While the buffer zone will be removed, the site will be shown in it’s NPWS designation as a proposed Natural Heritage Area, which will not require any alterations to the Environmental Report or the AA screening.	

Part B

Proposed Alterations of Proposed Amendment (no.2) to Southern Environs Local Area Plan 2015 - 2021

(To be read in association with Part A)

Omit wording ~~struck through~~ and insert wording underlined. Where policies or objectives are proposed to be included or amended the policy / objective numbers of those existing may need to be revised.

Alterations to Chapter 2 Development Strategy

Alter last sentence of 2nd paragraph of section 2.4.3 as follows:

A total of 123.9 hectares of land was proposed to be zoned 'Residential Development Area' in the Southern Environs LAP, 2011-2017. The actual quantum of residential zoned lands available for housing in the current Plan is ~~125~~ 122 hectares.

Table 5 Extent of land zoned in hectares for new residential before and after proposed Variation, and comparisons with Core strategy Target 2022

	2011 LAP	Net change	LAP as amended	Core Strategy Target	Surplus/ Deficit
Mungret Loughmore	84.56	-10.32	74.24 <u>82.54</u>	108.5 <u>124</u>	+6.6 <u>-2</u>
Remainder	39.34	none	39.34		
Southern Environs Total	123.9		115.1 <u>122*</u>		

* 123.9 hectares is the correct figure for the amount of land zoned for new residential development in the Southern Environs Local Area Plan, including 5.8 hectares site on the Old Cork Road which is undeveloped but zoned Existing Residential.

Alterations to Chapter 5 (Transport Chapter)

(Introduction of new paragraph in introductory section in p35 of the Transport Chapter after:

“Improvements to the national road network have released more capacity in the remaining road network, and this contributes to reducing traffic congestion, and creating more space and facilities for transport modes other than the car”.(p35)

“The Council is committed to the protection of the capacity of the national road network. To this end, the Council shall have regard to all relevant Government guidance including DoECLG ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012) in the carrying out of its functions. In addition care shall be taken in the carrying out of its statutory functions, to ensure development does not prejudice the future development or impair the capacity of the planned core network under TEN-T Regulations which includes the Foynes to Limerick Road improvement scheme. ”

(Change to wording of Objective T4, ‘New Distributor Roads’ Transport chapter, p33)

‘New ~~Distributor~~ Link Roads’

- (a) *It is an objective of the Council to ensure safe and adequate access to existing and developing districts within the Environs by seeking the provision/improvement of ~~distributor~~ link roads and junctions as shown on the Masterplan map and Map 3. In the layout and design of link roads attention shall be given to the context and interface with surrounding land uses in compliance with the Design Manual for Urban Roads and Streets (DoECLG, 2014)*
- (b) *Proposals shall make provision for the accommodation of bus services along ~~major distributor~~ the most significant link routes, ...*

(Change to wording of Objective IN 1: Sewerage Facilities, Infrastructure Chapter 6, p38)

Objective IN 1: Sewerage facilities within Mungret

It is the objective of the Council to:

~~Ensure that the lack of sewerage services in Mungret is addressed, within the Council’s overall scheme of priorities as set out in the Water Services Investment Programme. In exceptional~~

~~circumstances limited development may be permitted in the area, where in situ effluent treatment can be provided to relevant EPA standards.~~

Ensure that waste water infrastructure is adequate and appropriate and will keep pace with development that takes place in the plan area, in collaboration with Irish Water, to avoid any deterioration in the receiving water into which any discharges from such plants might take place.

ENVIRONMENT and HERITAGE CHAPTER (Chapter 7)

Change wording of EH 13 Nature Conservation Sites to remove reference to buffer zone

- c. Maintain the conservation value of all Natural Heritage Areas and also Natural Heritage areas proposed for designation by the Department of Arts Heritage and the Gaeltacht through the ~~DEHLG~~ National Parks and Wildlife service as well as any other sites that may be so designated during the lifetime of the plan through:

Land use Zoning of the proposed Loughmore Common Natural Heritage area that reflects its importance for conservation and its sensitivity.

- ~~i. Land use zoning of a 50 metre buffer zone around the Loughmore Commons NHA as semi-natural open space~~

Change last sentence of section 7.4.3 – remove reference to buffer

Therefore, additional disturbance to Loughmore Common and the Moneteen turlough and associated hydrology should be avoided. This is achieved through special zoning in the case of Loughmore Common coterminous with the proposed Natural Heritage Area, and the re-zoning of Moneteen turlough from residential to Semi-Natural Open Space. ~~In addition, in respect of Loughmore Commons pNHA, a 50 metre buffer zone is to be zoned around the pNHA as Semi-Natural Open Space.~~

Change section 7.4.3.1 removing reference to buffer

7.4.3.1 Loughmore Common pNHA and ~~buffer zone~~

Through the Plan as amended (Amendment no.2), the area of Loughmore Common proposed Natural Heritage Area ~~plus a 50 metre buffer zone around it~~ is zoned 'Semi-Natural Open Space'.

The opportunity was taken to ~~increase the buffer area around the turlough and to~~ alter the designation on the zoning map to reflect the areas status as a Proposed Natural Heritage area. Some on site flora are dependent on salt in the water feeding the turlough, which reaches the site from the tidal movements of the Shannon, itself a Special Area of Conservation site. This emphasises the interconnected nature of the hydrology of the Southern Environs.

LAND USE ZONING (Chapter 9)

9.2.1.1 Mixed Use (Mungret college)

The primary purpose of this zoning is to create a neighbourhood hub, giving priority to facilities for the local community which are appropriate to the scale and character of Mungret complex, and its nodal location with respect to both the neighbourhood park and the residential communities in the area. Insofar as it is consistent with this priority the following uses will be open for consideration, ~~providing a mix of~~ community uses, residential units, ~~community uses~~, employment generating enterprises, convenience shopping outlets, and local services. Uses that could also be facilitated include non-retail offices, small scale art craft activities and light industrial workshops.

[Eight Changes to wording of the following in the Urban Design Chapter (Chapter 10)]

URBAN DESIGN CHAPTER

Objective ML01 Mungret naming and identity

It is an objective of the Council to respect and enhance the identity of Mungret as a place, community and communal centre and as a visitor attraction, by ensuring appropriate consideration of context that reflects the following priorities:

- The protection and enhancement of Mungret college as a community resource and neighbourhood hub
- The protection and enhancement of Mungret ~~abbey~~ Monastic complex as an important historic site
- Pedestrian and cycle linkages between the college, abbey and village

- The naming of new developments, which should reflect local features, views, and placename heritage

URBAN DESIGN CHAPTER

Objective MLO4 '*Density and Housing Type Mix*'

(Point 5):

Where apartments are being proposed they should be planned with a range of apartment sizes, ~~and with general emphasis on accommodating families, and ensuring the average floor area across schemes on accommodating families, and ensuring the average floor area, across schemes of 85 sq.m. with the minimum floor areas for different unit types being:~~

- ~~i. 1 bedroom unit: 55 sq.m~~
- ~~ii. 2 bedroom unit: 80 sq.m to 90 sq.m~~
- ~~iii. 3 bedroom unit or equivalent: 100 sq.m~~

~~The following points should also be taken into account in relation to apartments:~~

- ~~(i) Private outdoor space...~~
- ~~(ii) Storage...~~
- ~~(iii) Cycle Parking...~~

(Replace with):

Where apartments are being proposed, they should be planned with a range of apartment sizes, and shall be consistent with DECLG guidance under s28 'Sustainable Urban housing: Design Guidance' (DECLG, December 2015) in all respects including size, internal storage, private amenity space, ceiling height and aspect, and communal facilities etc.

URBAN DESIGN CHAPTER

Objective MLO5 (Serviced Sites) to be altered by adding the following:

iv) the layout shall not be such as to obstruct any legal rights of way held by third parties. Rights of way shall be specifically indicated on site layout plans submitted as part of any future planning application. They should use the single road and entrance to serve this site.

URBAN DESIGN CHAPTER CHANGE FIVE (of eight)

Change Objective MLO7 (Urban Design Chapter)

Objective MLO7 Access infrastructure and Permeability

There shall be clear connectivity between proposed new residential pathways and the indicative walks indicated on Map 2 of this LAP. Layouts should address natural contours as far as is practicable.

A network of pedestrian and cycle routes shall be provided through the lands and shall provide appropriate links to adjoining areas; the ~~distributor~~ main link roads shall also provide pedestrian and cycle routes and shall be designed to accommodate bus stops. The connector route to the neighbourhood hub shall also include provision for bus stops. Proposals seeking planning permission shall demonstrate consideration of same following discussion with Bus Eireann.

URBAN DESIGN CHAPTER

(p37)

Objective MLO11 Protected structures

The existing protected structures in this area, Mungret College and Mount ~~Temple~~ Mungret House shall be preserved. Any proposals for these lands shall illustrate how the structures will be protected and accommodated in the overall development. Proposed building design shall respect existing architectural styles where relevant and careful consideration shall be given to the use of materials in any proposal.

URBAN DESIGN CHAPTER

Change wording of Objective MLO12

Objective MLO12:-(refer to Map 4 for location of Recorded Monuments)

~~In regard to the two upstanding ring forts Recorded Monuments, LI013-007, LI013-011, which are located on the northern edge of the buffer of semi-natural open space provided for Loughmore Common, plans for their future management and on-going maintenance shall be divided in co-operation with the National Monuments Service DAHG. The other two Recorded National Monuments (LI013-008 and LI013-133) shall be properly investigated prior to any works and suitable mitigation provided.~~

[Replace With]

ObjectiveMLO12: Archaeology: Recorded Monuments (refer to Map 4 for location of Recorded Monuments)

“The protection of Archaeological Monuments shall be as set out in the County Development Plan (Objectives EH025-027) including *inter alia* archaeological impact assessments and appropriate buffers. In regard to the bi-vallate ringfort, LI013-007, this shall be provided with a 50 m buffer to properly protect its setting (refer to Map 6 Mungret Master Plan), and plans for its future management and its ongoing maintenance shall be devised in co-operation with the National Monuments Service, DAHG.”

URBAN DESIGN CHAPTER CHANGE

Change wording of Objective MLO14 to omit references to buffer zone

Objective MLO14: Proposed NHA and buffer zone

As stated in Objectives EH13 and ZD8 in reference to the proposed Natural Heritage Area of Loughmore Common the Council is committed to the protection and conservation of ~~both~~ the proposed NHA ~~and its associated buffer zone~~ in the interests of conservation of this important wetland. Consistent with this objective, the Council is committed to ensuring that the proposed NHA ~~and buffer zone are~~ is managed appropriately and in this regard:

- There shall be no development or artificial lighting.
- Additional measures to protect ~~both~~ the proposed NHA ~~and the buffer zone~~ from disturbance by excessive activity including hedgerow planting and fencing will be considered.

URBAN DESIGN CHAPTER CHANGE

- **Alter wording of Objective MLO16**

To protect and enhance the public realm of the village centre (defined on map), with emphasis on minimisation of extraneous through traffic, on inclusive access, and on improvement of pedestrian safety and environment. The Council shall engage with the public and any relevant interest groups in relation to any proposal to alter points of access to/from Mungret village.

CHANGES TO MAPS

1. Remove semi-natural open space zoning for pNHA and replace with pNHA zoning
2. Remove the 50 metre buffer zone around the pNHA and change all to residential zoning except for site south of the drain zoned Educational Community, which is to be zoned Agricultural.
3. Provide a 50 metre buffer superimposed on the proposed zoning, around Recorded Monument LI013-007.
4. Show the proposed walkway in Map 6 to its fullest extent running south from the main road R859 to the proposed link road as per Map 2.
5. Amend map 3 omitting proposed link road and cycle land to Caher road.
6. Replace 'distributor road' with 'link road' in legend.

Appendix One: Land Use Matrix

The following use classes apply in the Land Use Zoning Matrix:

/ = Generally Permitted

A use which is generally permitted is one which the Council accepts in the relevant zone. However, it is still subject to the normal planning process including policies and objectives outlined in the Plan.

O = Open for Consideration

An Open for Consideration use is one which the Council may permit where it is satisfied that the suggested form of development will be compatible with the policies and objectives for the zone, will not conflict with the permitted uses and conforms with the proper planning and sustainable development in the area.

X = Generally Not Permitted

A use Generally Not Permitted is one which would be incompatible with the policies and objectives for the zone, would conflict with the permitted uses and would be contrary to the proper planning and sustainable development of the area.

Southern Environs Land Use Zoning Matrix Table

Development/ Zone	Existing Residential/R DA	Enterprise & Employment	Industrial	Open Space/ Recreational	Retail/ Commercial	Mixed use	Education/ Community Facilities	Agriculture	Special Control Area	Semi Natural Open Space
Dwelling	/	X	X	X	O	O	X	X*	X	X
Apartments	/	X	X	X	/	/	X	X	X	X
Guesthouses	O	X	X	X	/	O	X	X	X	X
Hotel	O	O	X	X	/	/	X	X	X	X
Local Shops	O	O****	O****	X	/	O	X	X	X	X
Retail Warehousing	X	O***	O	X	/	X	X	X	X	X
Regional Shops	X	X	X	X	/	X	X	X	X	X
Take Away	X	X	X	X	/	O	X	X	X	X
Pub	X	X	X	X	/	O	X	X	X	X
Restaurant/C afé	O	O****	O****	X	/	O	X	X	X	X
Cinema, Dance Hall	X	O	X	X	/	O	X	X	X	X
Conference Facilities	X	O	X	X	/	O	X	X	X	X
Community Hall Recreation	O	O	O	X	O	/	O	X	X	X
Community Hall Functions	O	O	O	X	/	/	O	X	X	X
Nursing Home / Nursing home integrated with retirement homes	O	O	X	X	O	O	X	X	X	X
Health Centre/Clinic	O	O	X	X	O	/	X	X	X	X
Hospital	X	O	X	X	O	O	X	X	X	X
Church/School	/	O	X	O	O	/	/	X	X	X
Open space/Recrea tional/Leisure	O	O	X	/	O	/	/	X	X	O
Office	O	O	O	X	/	O	X	X	X	X
Car Repair/Sales	X	O***	/	X	O	X	X	X	X	X
Petrol Station	X	X	/	X	O	X	X	X	X	X

Southern Environs Land Use Zoning Matrix Table

Industry										
General	X	O	/	X	X	X	X	X	X	X
Light	O	/	/	X	O	O	X	X	X	X
Wholesale/Warehouse	X	/	/	X	O	X	X	X	X	X
Logistics	X	/	O	X	X	X	X	X	X	X
Agricultural Machinery	X	X	/	X	O	X	X	X	X	X
Garden Centre	O	O	O	X	O	O	X	X	X	X
Amusement Arcade	X	X	O	X	/	X	X	X	X	X
Advertising Panel	X	O	O	X	/	O	X	X	X	X
Hair Dressing salon	O	O	X	X	/	/	X	X	X	X
Banks	O	O	X	X	/	O	X	X	X	X
Group Housing, Halting Sites & Transient sites for Travellers	O	O	O	X	O	X	X	X	X	X
Childcare Facilities	/	O	O	X	/	/	O	X	X	X
Bring Centre	/	O	/	X	/	O	/	/	X	X
Recycling Centre (e.g Bottle Banks)	O	O	O	O	/	/	/	O	X	X
Burial Ground	O	O	O	O	O	X	/	/	X	X
Allotments	O	O	O	O	O	O	O	O	X	X

* = Except for farmer, son or daughter - see Housing Chapter. *** = Retail Warehousing & car repair/sales not permitted in Raheen Business Park or land zoned 'Enterprise & Employment' west of the Raheen Industrial Estate ***** = To serve the local working population only.

Key = / Generally Permitted O Open for Consideration X Generally not permitted

Part C

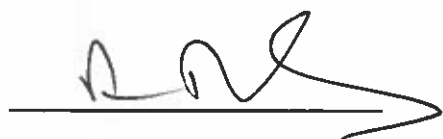
Strategic Environmental Assessment Screening and Appropriate Assessment Screening

The changes proposed are not significant and therefore alterations to the Environmental and Appropriate Assessment screening report are not required.

Proposed Amendment to Southern Environs Local Area Plan 2011-2017:
Section 20(3)(c) Chief Executives Report to Members

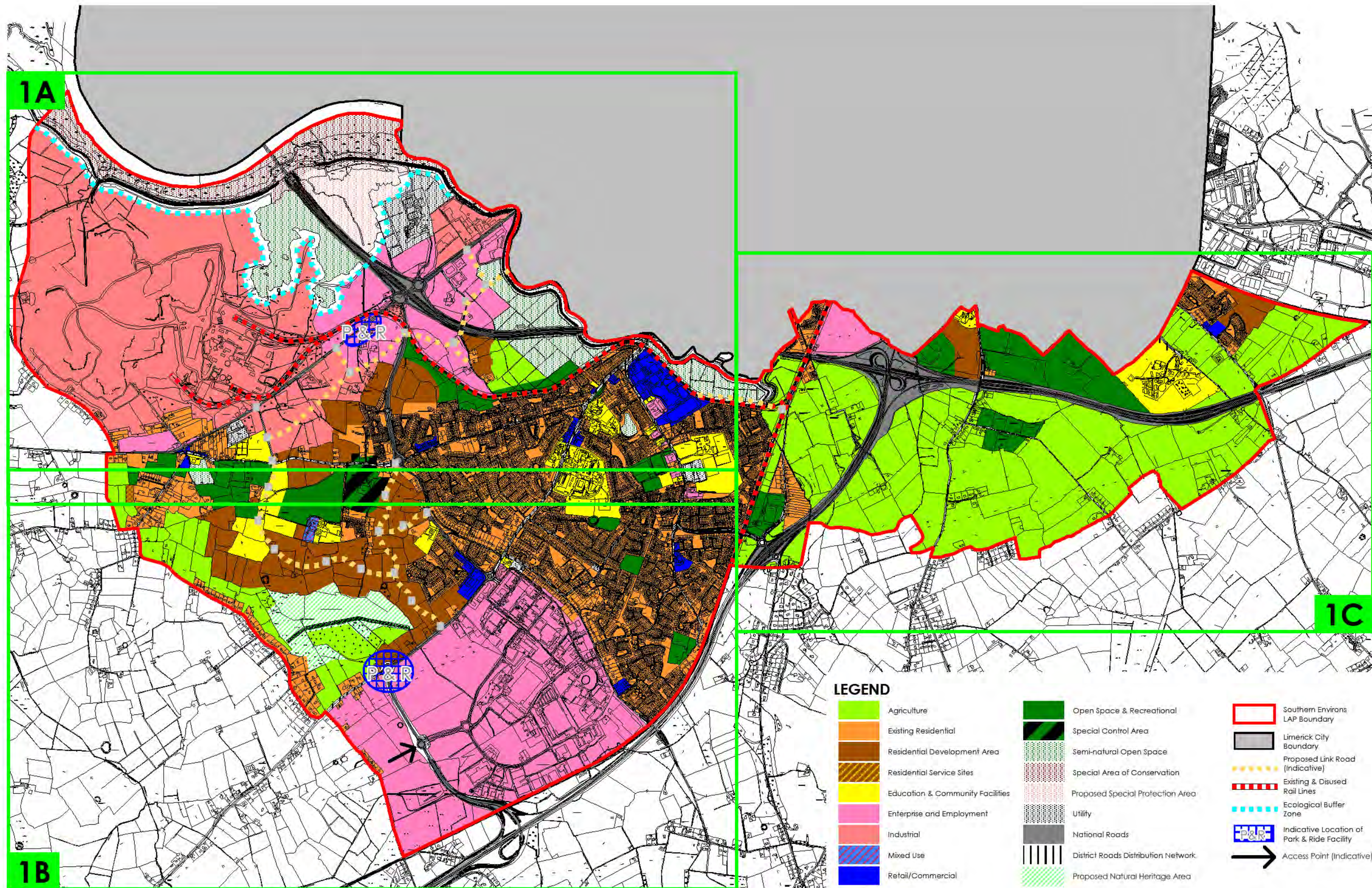
Chief Executives Recommendation:

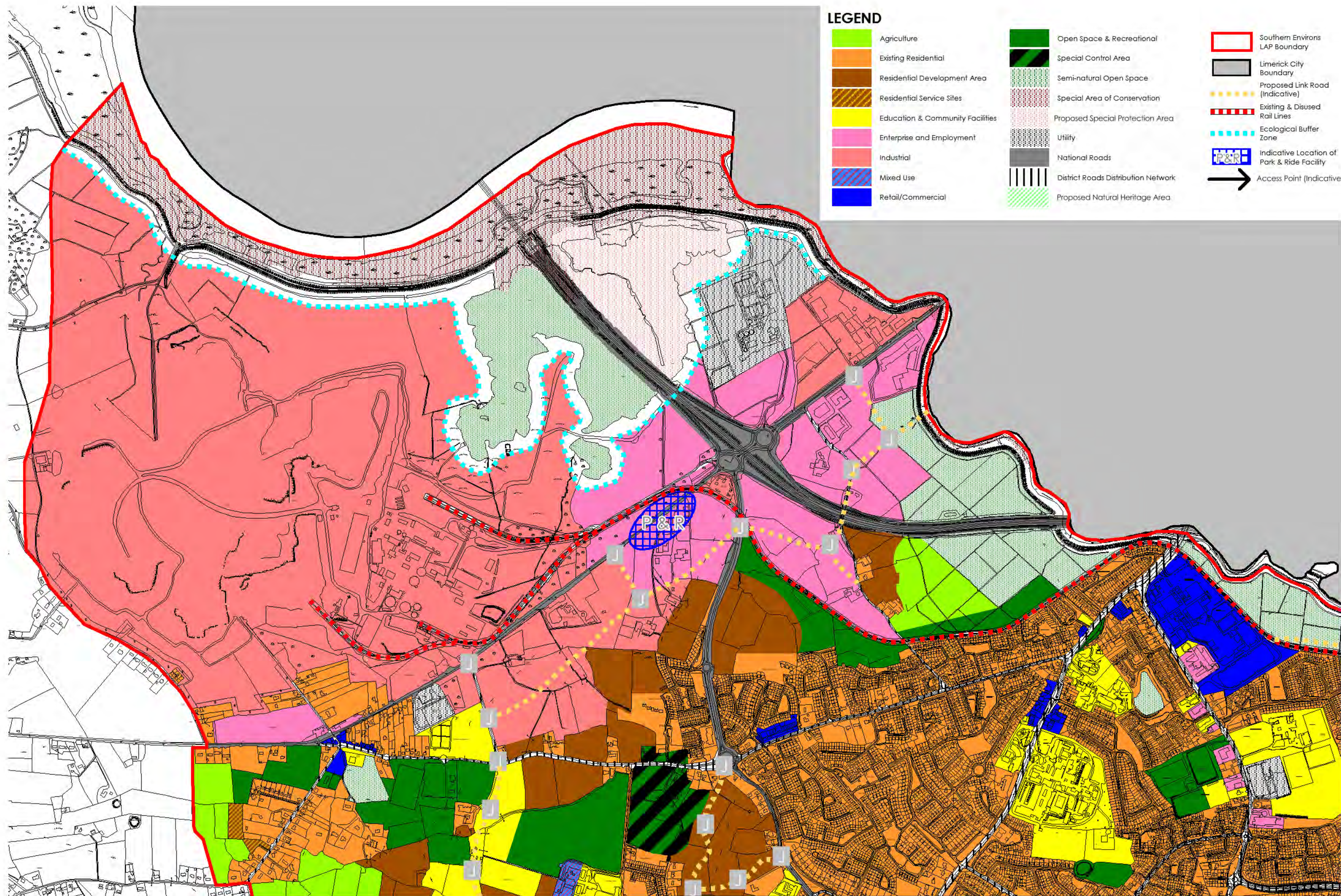
It is recommended that the alterations proposed to the amendment of the Local Area Plan that are outlined in this Report are made and the Material Alterations are placed on public display for a further 4 weeks.

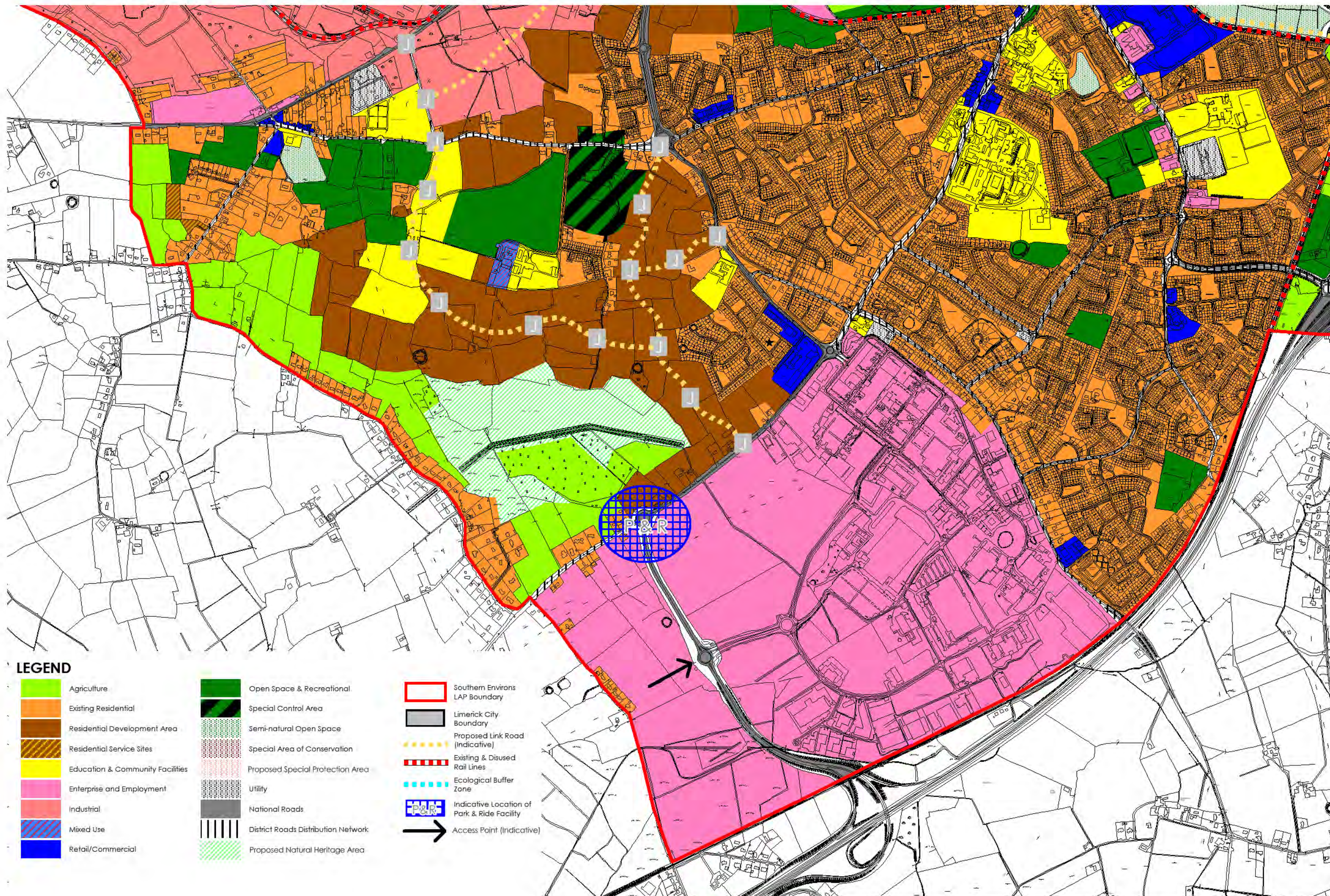
A handwritten signature in black ink, appearing to read 'Pat Daly', is written over a horizontal line. The signature is stylized with a large, sweeping flourish that extends to the right.

Pat Daly,


























Director of Economic Development and Planning

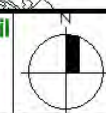


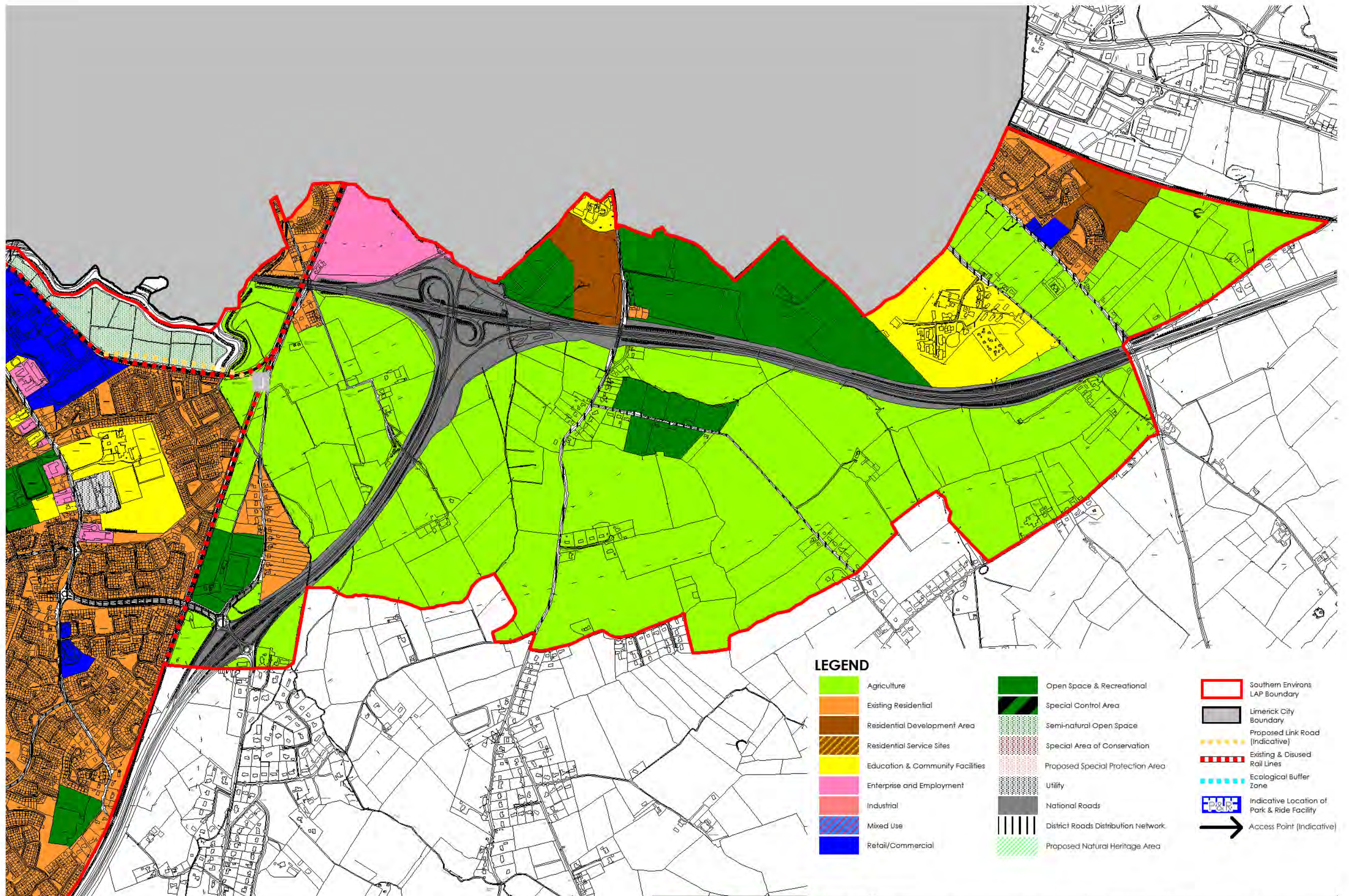




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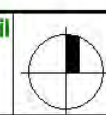
- | | | | | | |
|---|----------------------------------|---|-------------------------------------|--|---|
|  | Agriculture |  | Open Space & Recreational |  | Southern Environs LAP Boundary |
|  | Existing Residential |  | Special Control Area |  | Limerick City Boundary |
|  | Residential Development Area |  | Semi-natural Open Space |  | Proposed Link Road (Indicative) |
|  | Residential Service Sites |  | Special Area of Conservation |  | Existing & Disused Rail Lines |
|  | Education & Community Facilities |  | Proposed Special Protection Area |  | Ecological Buffer Zone |
|  | Enterprise and Employment |  | Utility |  | Indicative Location of Park & Ride Facility |
|  | Industrial |  | National Roads |  | Access Point (Indicative) |
|  | Mixed Use |  | District Roads Distribution Network | | |
|  | Retail/Commercial |  | Proposed Natural Heritage Area | | |

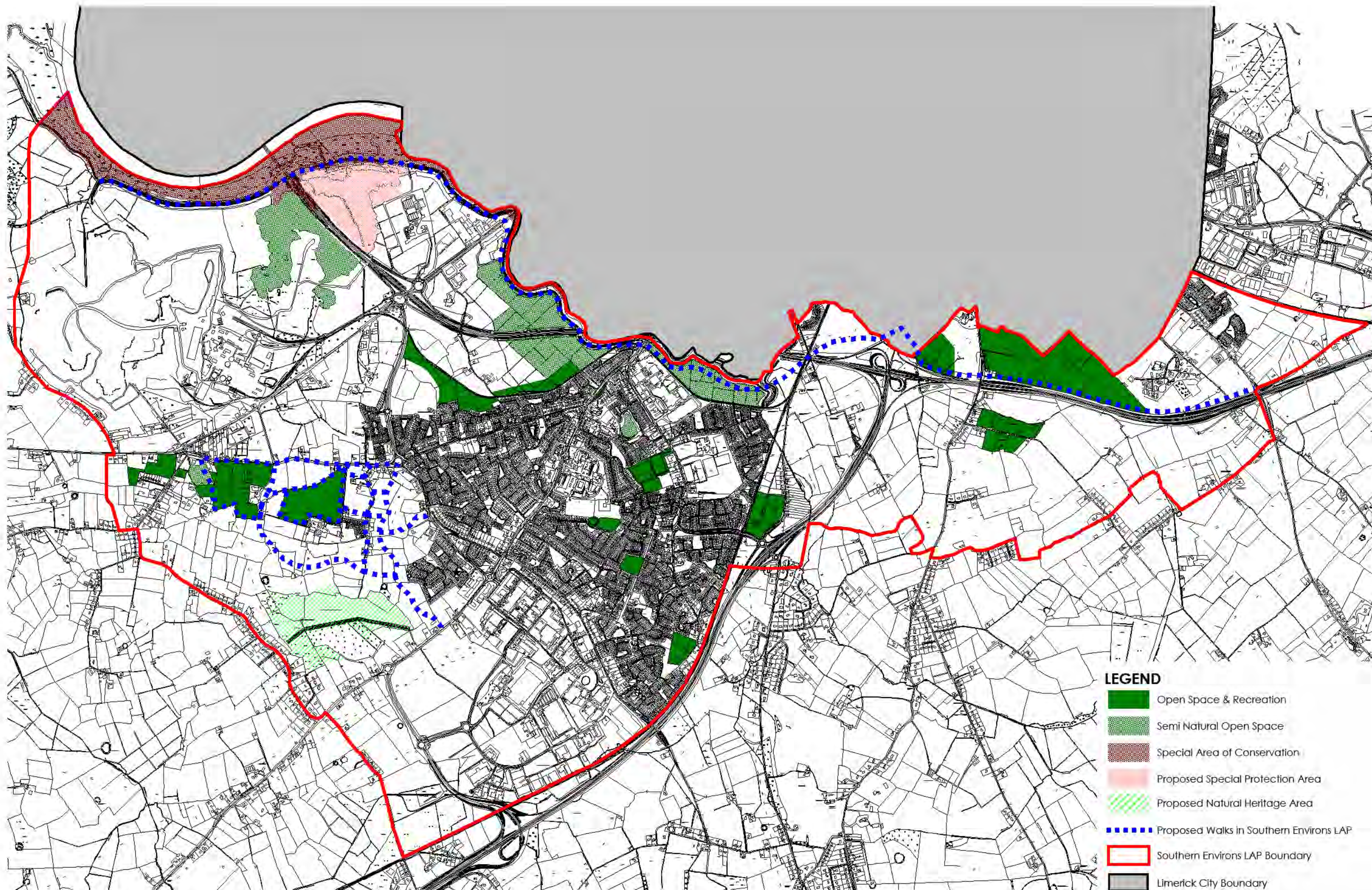




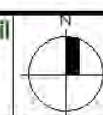
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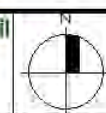
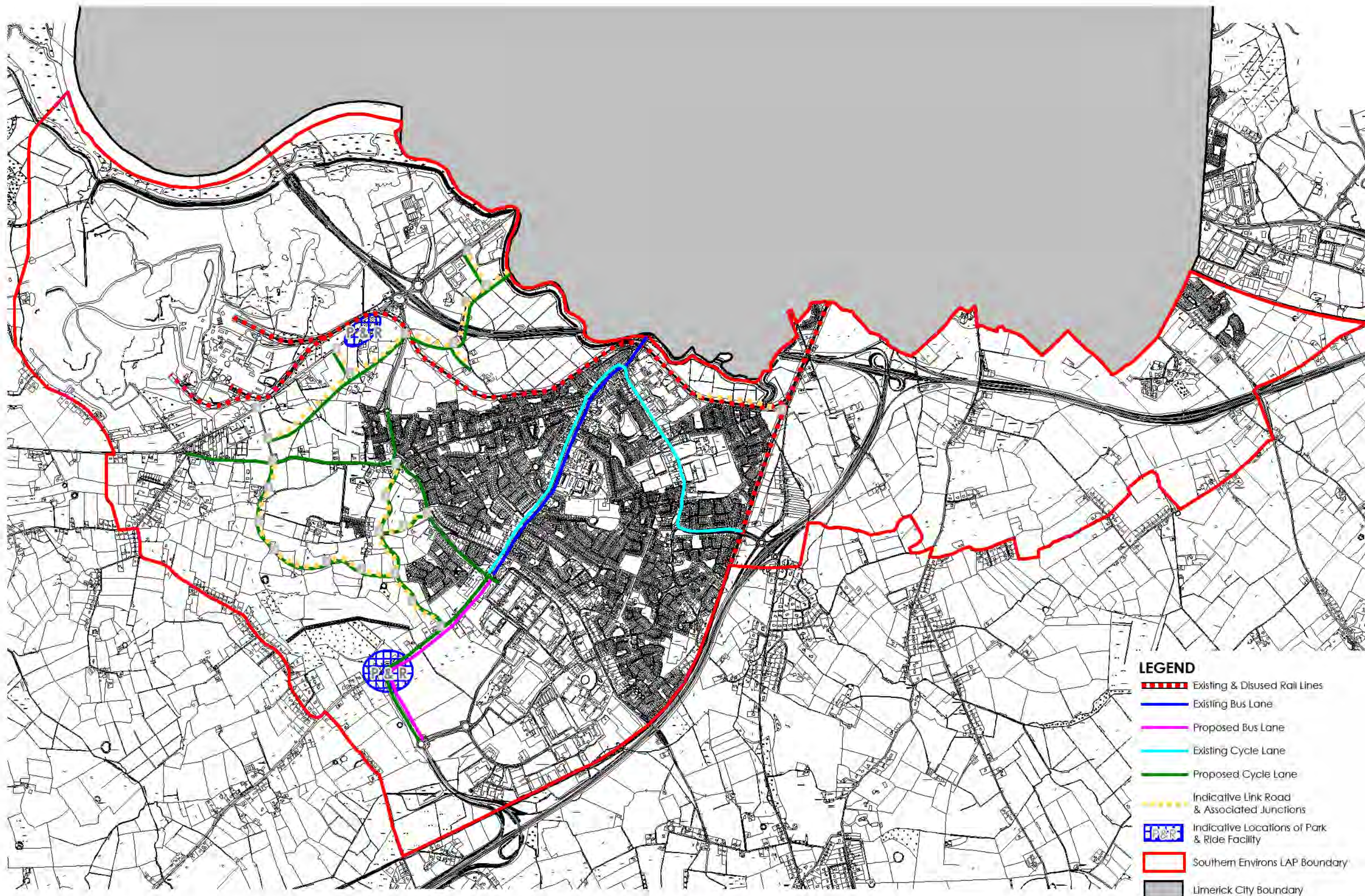
	Agriculture		Open Space & Recreational		Southern Environs LAP Boundary
	Existing Residential		Special Control Area		Limerick City Boundary
	Residential Development Area		Semi-natural Open Space		Proposed Link Road (Indicative)
	Residential Service Sites		Special Area of Conservation		Existing & Disused Rail Lines
	Education & Community Facilities		Proposed Special Protection Area		Ecological Buffer Zone
	Enterprise and Employment		Utility		Indicative Location of Park & Ride Facility
	Industrial		National Roads		Access Point (Indicative)
	Mixed Use		District Roads Distribution Network		
	Retail/Commercial		Proposed Natural Heritage Area		

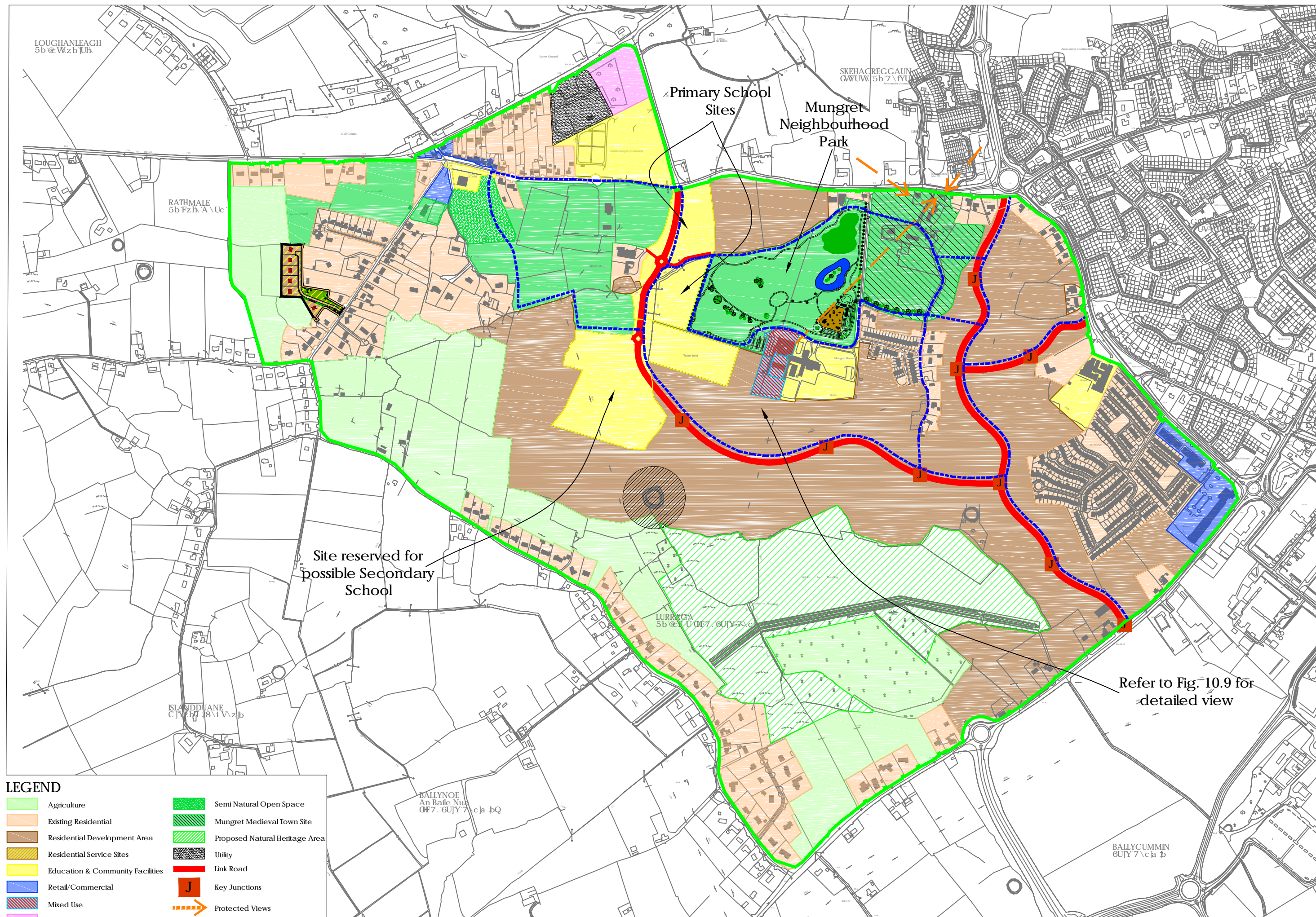




- LEGEND**
- Open Space & Recreation
 - Semi Natural Open Space
 - Special Area of Conservation
 - Proposed Special Protection Area
 - Proposed Natural Heritage Area
 - Proposed Walks in Southern Environs LAP
 - Southern Environs LAP Boundary
 - Limerick City Boundary

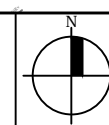


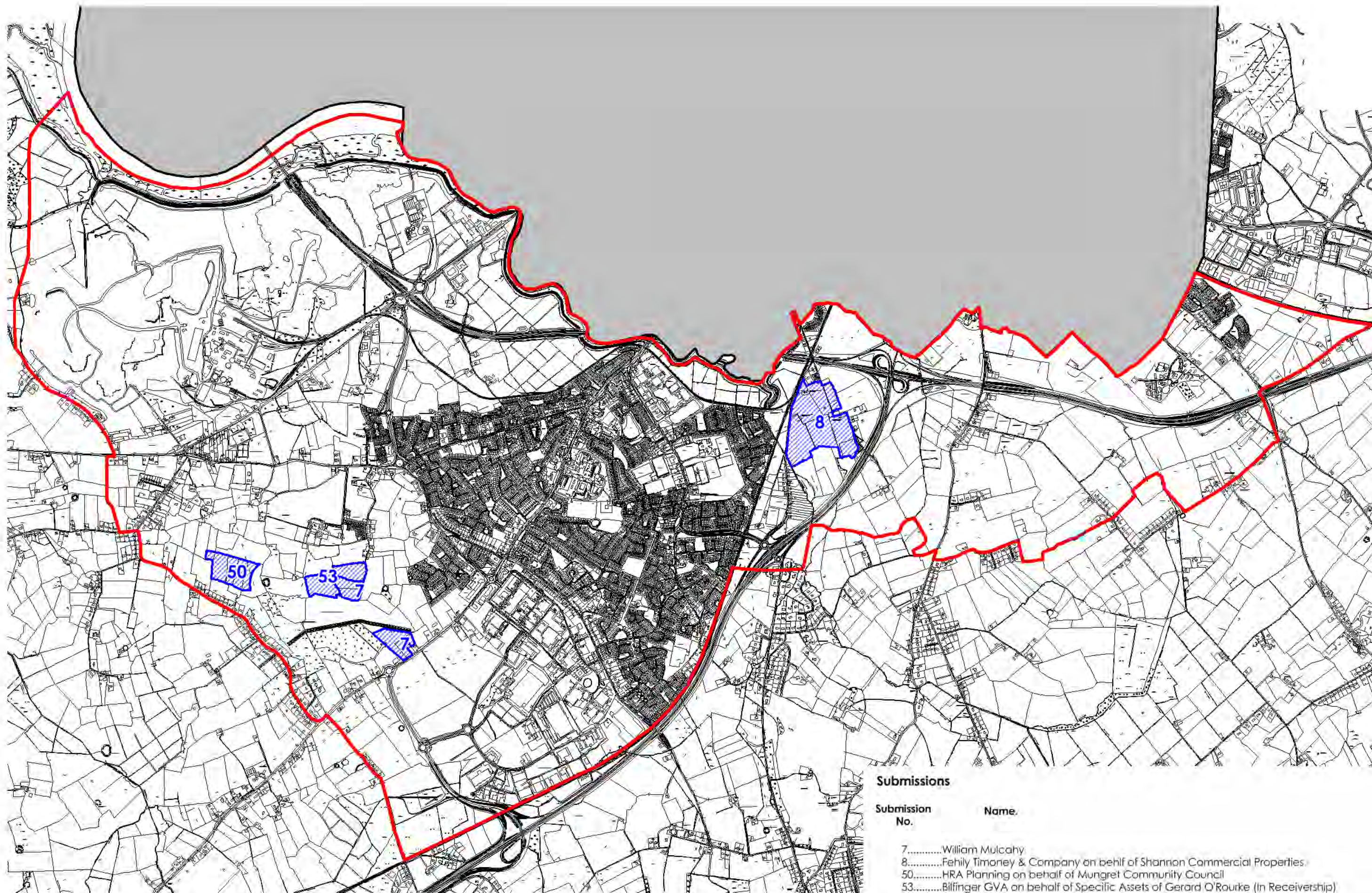




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	Agriculture		Semi Natural Open Space
	Existing Residential		Mungret Medieval Town Site
	Residential Development Area		Proposed Natural Heritage Area
	Residential Service Sites		Utility
	Education & Community Facilities		Link Road
	Retail/Commercial		Key Junctions
	Mixed Use		Protected Views
	Industrial		Proposed Walks
	Open Space & Recreation		Archaeological Buffer





Submissions

Submission No.	Name
7.....	William Mulcahy
8.....	Fehily Timoney & Company on behalf of Sharrion Commercial Properties
50.....	HRA Planning on behalf of Mungret Community Council
53.....	Bilfinger GVA on behalf of Specific Assets of Gerard O'Rourke (In Receivership)

